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5 BRIAN W. MORGAN - STATE BAR No. 019913
Attorneys for Plaintiff

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
7 **IN AND FOR THE COUNTY OF MARICOPA**

8
9 LAVEEN MEADOWS HOMEOWNERS'
ASSOCIATION, INC., an Arizona
10 non-profit corporation,

11 Plaintiff,

12 vs.

13
14 CARLOS MEJIA, a married man, as his
sole and separate property; STATE OF
15 ARIZONA, a governmental entity;
16 LEXINGTON NATIONAL INSURANCE
CORPORATION; US IMMIGRATION
17 BONDS AND INSURANCE SERVICES,
INC.; UNITED STATES OF AMERICA,
18 DEPARTMENT OF THE
19 TREASURY-INTERNAL REVENUE
SERVICE; THE UNKNOWN HEIRS AND
20 DEVISEES OF ABOVE NAMED
21 DEFENDANTS, IF DECEASED,

22 Defendants.

No. CV2016-094391

SUPPLEMENTAL CHINA DOLL
AFFIDAVIT IN SUPPORT OF AWARD
OF ATTORNEY FEES INCURRED
POST-JUDGMENT

23 STATE OF ARIZONA)
24 County of Maricopa) ss.

25 Brian W. Morgan, being first duly sworn, says:

- 26 1. That he is one of the attorneys for the Plaintiff in the above-entitled action.
27
28 2. That based upon the records maintained by the law firm, the firm has rendered

1 legal services for Plaintiff in the above-entitled action in the amount of \$12,510.00. A credit
2 of 0.7 hours or \$210.00 was applied due to the actual time rendered to appear at the initial
3 default hearing, for a total of \$12,300.00 in requested fees. (See attached Exhibit "A".)


4
5 3. The charges incurred on behalf of Plaintiff were incurred pursuant to a fee
6 agreement between Plaintiff and the law firm and the amounts were charged in accordance
7 therewith. . The fee agreement includes flat fees for certain legal services and services billed
8 according to hourly rates, all of which are agreed to and provided for in the fee agreement.
9
10 Four attorneys from the firm rendered services with respect to the litigation: Brian W. Morgan
11 (BWM) at \$300.00 per hour for hourly services; W. William Nikolaus (WWN) at \$300.00 per
12 hour for hourly services; Samuel C. Richardson (SCR) at \$300.00 per hour for hourly
13 services; and Penny L. Koepke (PLK) at \$300 per hour for hourly services. Of the \$12,300.00
14 in requested attorney fees, 11.8 hours or \$3,540.00 relate to Mr. Morgan, 16.5 hours or
15 \$4,950.00 relate to Mr. Nikolaus, 10.5 hours or \$3,150.00 relate to Mr. Richardson, and 2.9
16 hours or \$870.00 relate to Ms. Koepke. (See Exhibit "A" hereto.)

17
18 4. I have reviewed the records and file maintained by the firm, as well as the
19 substantive pleadings and legal services necessary in order to collect on the Judgment, and I
20 avow to this Court that the sum of \$12,300.00 as and for attorney fees, is, in my opinion, in
21 compliance with the applicable ethical standards for attorney fees and constitutes a fair and
22 reasonable fee.
23

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1
2 6. I have reviewed the records and files in the above-entitled action with respect to
3 the advancement of costs and disbursements, and service of process costs in the amount of
4 \$37.35 have been expended in advance on behalf of Plaintiff.
5

6 DATED this 19th day of June, 2017.

7
8 
9 Brian W. Morgan, Esq.
Attorney for Plaintiff

10 STATE OF ARIZONA)
11 County of Maricopa) ss.

12 On the 19 day of June, 2017 before me, the undersigned Notary Public in and for the
13 County of Maricopa in the State of Arizona, personally appeared Brian W. Morgan, who
14 acknowledged that he/she is the Attorney for the Association/Claimant and being authorized
of said Association.



17 
18 Notary Public

19 My Commission Expires:

20 April 28, 2019

21 COPY of the foregoing e-filed
this 19 day of June, 2017.

22 COPY of the foregoing mailed
this 19 day of June, 2017, to:

23 Jonathan A. Dessauls, Esq.
5353 North 16th Street, Suite 110
Phoenix, Arizona 85016
24 *Attorney for Defendant Carlos Mejia*

25 Lexington National Insurance Corporation
26 c/o statutory agent, Brian J. Frank
11426 York Road
27 Cockeysville, MD 21030
28 *Defendants Pro Se*

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U.S. Immigration Bonds and Insurance Services Inc.
c/o statutory agent, Jeremy Wolf
114 SW 10th Street, Suite C
Fort Lauderdale, FL 33315
Defendants Pro Se

