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FILE No. 4107.054

5 CHAD M. GALLACHER- STATE BAR No. 025487
Attorneys for Plaintiff

6 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

7
8 **IN AND FOR THE COUNTY OF MARICOPA**

9 LAVEEN MEADOWS HOMEOWNERS'
ASSOCIATION, INC., an Arizona nonprofit
10 corporation,

11 **Plaintiff,**

12 vs.

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

21 **Defendants.**

No. CV2016-094391

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

22 State of Arizona)
23)ss.
24 County of Maricopa)

25 Chad M. Gallacher, being first duly sworn, says:

26 1. That he/she is one of the attorneys for the Plaintiff in the above-entitled action.

27 2. That based upon the records maintained by the law firm, the firm has rendered and

28 will render post-judgment legal services for Plaintiff in the above-entitled action in the amount
29 of \$7,680.00. (See attached Exhibit "A".)

1 3. The charges incurred on behalf of Plaintiff were incurred pursuant to a fee
2 agreement between Plaintiff and the law firm and the amounts were charged in accordance
3 therewith. Three attorneys from the firm rendered services with respect to the post-judgment
4 amounts incurred: Chad M. Gallacher (CMG) at \$300.00 per hour; Samuel C. Richardson (SCR)
5 at \$300.00 per hour; Brian W. Morgan (BWM) at \$300.00 per hour. Of the \$7,680.00 in
6 requested attorney fees, 12.0 hours or \$3,600.00 relate to Mr. Gallacher, 12.6 hours or \$3,780.00
7 relate to Mr. Richardson, and 1.0 hours or \$300.00 relate to Mr. Morgan.

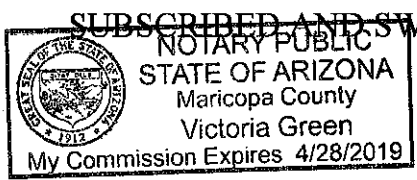
8
9 4. I have reviewed the records and file maintained by the firm, as well as the
10 substantive pleadings and legal services necessary in order to pursue post-judgment collections,
11 and I avow to this Court that the sum of \$7,680.00 as and for post-judgment attorney fees, is, in
12 my opinion, in compliance with the applicable ethical standards for attorney fees and constitutes
13 a fair and reasonable fee.

14 5. I have reviewed the records and files in the above-entitled action with respect to
15 the advancement of taxable and non-taxable costs, and disbursements in the amount of \$98.51
16 have been expended in advance on behalf of Plaintiff.

17
18 DATED this 4th day of April, 2018.

19
20 By *Chad M. Gallacher*
21 Chad M. Gallacher, Esq.
22 *Attorney for Plaintiff*

23 State of Arizona)
24)ss.
25 County of Maricopa)



26 ~~SUBSCRIBED AND SWORN~~ to before me this 4th day of April, 2018 by:

27 *Victoria Green*
28 Notary Public

29 My Commission Expires:
April 28, 2019

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COPY of the foregoing
E-Filed this 5 day of April, 2018 to:

Honorable Margaret Benny
Commissioner of the Superior Court

COPY of the foregoing
mailed this 5 day of April, 2018 to:

Jonathan A. Dessauls, Esq.
5353 North 16th Street, Suite 110
Phoenix, Arizona 85016
Attorney for Defendant

Lexington National Insurance Corporation
c/o statutory agent, Brian J. Frank
11426 York Road
Cockeysville, MD 21030
Defendants pro se

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

