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10 *Attorneys for Plaintiff*

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

12 **IN AND FOR THE COUNTY OF MARICOPA**

13 LAVEEN MEADOWS HOMEOWNERS'
14 ASSOCIATION, INC., an Arizona nonprofit
15 corporation,

16 *Plaintiff,*

17 vs.

18 CARLOS MEJIA, a married man, as his sole and
19 separate property; STATE OF ARIZONA, a
20 governmental entity; LEXINGTON NATIONAL
21 INSURANCE CORPORATION; US
22 IMMIGRATION BONDS AND INSURANCE
23 SERVICES, INC.; UNTIED STATES OF
24 AMERICA, DEPARTMENT OF THE
25 TREASURY-INTERNAL REVENUE
26 SERVICE; THE UNKNOWN HEIRS AND
27 DEVISEES OF ABOVE NAMES
28 DEFENDANTS, IF DECEASED,

29 *Defendants.*

No. CV2016-094391

PLAINTIFF'S APPLICATION FOR
AMOUNT OF ATTORNEY FEES
INCURRED POST-JUDGMENT

(Assigned to the Hon. Margaret Benny)

Plaintiff, by and through counsel undersigned, hereby moves this Court for an award of attorney fees in an amount not less than \$7,680.00 incurred post-judgment, pursuant to this Court's Minute Entry filed March 28, 2018, the operative legal documents and A.R.S. § 33-1807(H).


This request is being made as a result of the legal fees the Plaintiff was required to incur to defend the Judgment. Additionally, the underlying Judgment specifically awards Plaintiff

1 "...accruing [attorney] fees not otherwise addressed herein upon application (motion to the
2 Court when occurred)". As such, all of the attorney fees and costs requested herein are
3 specifically provided for in the underlying Judgment and, since the Judgment has not been
4 reversed or set aside on appeal, the amounts requested herein for attorney fees and costs are
5 appropriate, reasonable and should be awarded by the Court.

6 Plaintiff's post-judgment fee request of \$7,680.00 is undeniably appropriate in light of the
7 facts and circumstances of this case and pursuant to the express language of the underlying
8 Judgment. Plaintiff has not requested additional estimated fees for oral argument as no challenge
9 is expected under the circumstances. However, if oral argument or a reply brief to any of these
10 filings becomes necessary, Plaintiff reserves the right to request additional fees and costs to be
11 incurred. A proposed Order is submitted herewith.

12 DATED this 4th day of April, 2018.

13 **MAXWELL & MORGAN, P.C.**

14 By 
15 Chad M. Gallacher, Esq.
16 4854 East Baseline Road, Suite 104
17 Mesa, Arizona 85206
18 *Attorneys for Plaintiff*

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

22 Honorable Margaret Benny
23 Commissioner of the Superior Court

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

27 Jonathan A. Dessauls, Esq.
28 5353 North 16th Street, Suite 110
29 Phoenix, Arizona 85016
Attorney for Defendant

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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*

