

1                   **CHDB Law LLP**  
2                   1400 East Southern Avenue, Suite 400  
3                   Tempe, Arizona 85282-5691  
4                   P. 480-427-2800; F. 480-427-2801  
5                   [minuteentries@CHDBLaw.com](mailto:minuteentries@CHDBLaw.com)  
6                   (Charles H. Oldham - SBN 021957)  
7                   [Chuck.Oldham@chdbl.com](mailto:Chuck.Oldham@chdbl.com)  
8                   (Ari A. Bowhay - SBN 036858)  
9                   [Ari.Bowhay@chdbl.com](mailto:Ari.Bowhay@chdbl.com)  
10                  AFL.TARACND.01  
11                  Attorneys for Defendant

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

9                   LISA MARX, an individual,  
10                  Plaintiff,

11                  vs.

12                  TARA CONDOMINIUM ASSOCIATION,  
13                  an Arizona non-profit corporation; MARK  
14                  GOTTMANN, an individual; DENNIS  
15                  ANDERSON, an individual  
16                  Defendant.

Case No. CV2025-012980

**AFFIDAVIT IN SUPPORT OF  
APPLICATION FOR ATTORNEYS'  
FEES AND COSTS**

(Assigned to Honorable Randall Warner)

16                  I, Ari Bowhay, hereby state:

17                  1. I am an attorney at CHDB Law, LLP, the firm that Represents Defendant, Tara  
18                  Condominiums Association (the "Association"), in the above-entitled matter, and make this  
19                  affidavit in support of the Association's Application for Attorneys' Fees.

20                  2. I have reviewed the time and billing records maintained by CHDB Law, LLP., and a  
21                  true and accurate copy of the billing statements setting forth a description of services, and the  
22                  amount of the fees charged is attached hereto as **Exhibit A** and incorporated herein.

23                  3. Attorneys Charles H. Oldham ("CHO") and Ari A. Bowhay("AAB"), have  
24                  expended time rendering legal services on this matter. The hourly rate for Charles H. Oldham  
25                  is \$225.00 in 2025. The hourly rate for Ari A. Bowhay is \$200.00 in 2025. In addition,  
26

1 litigation paralegal Suzanne N. Hilborn (“SNH”) expended time rendering legal services in this  
2 matter. The hourly rate for Suzanne is \$95.00.

3 4. The fees charged to the Association in this case comply with the applicable ethical  
4 standard for attorneys’ fees, constitutes a fair and reasonable fee given the substance of the  
5 pleadings and the services rendered in this case, and have been paid or agreed to be paid by the  
6 client.

7 5. The billing statements and work-in-process statements attached as Exhibit A reflect  
8 the actual amount of time in rendering legal services to the Association in this case through the  
9 date of this affidavit, totaling \$5,957.70 in attorneys’ fees and \$13.40 in costs.

10 I declare under penalty of perjury the foregoing is true and correct pursuant to Rule  
11 80(c), *Ariz.R.Civ.P.*

12 RESPECTFULLY SUBMITTED this 4th day of September, 2025.

13 **CHDB LAW LLP**

14  
15 By: /s/ Ari A. Bowhay  
16 Charles H. Oldham, Esq.  
17 Ari A. Bowhay, Esq.  
18 1400 East Southern Avenue, Suite 400  
19 Tempe, Arizona 85282-5691  
20 *Attorneys for Defendant*

21 **ORIGINAL** of the foregoing e-filed  
22 this 4th day of September, 2025.

23 Clerk of the Court  
24 Maricopa County Superior Court  
25 [www.AZTurboCourt.gov](http://www.AZTurboCourt.gov)  
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**COPY** of the foregoing mailed/e-mailed  
this 4th day of September, 2025, to:

Lisa Marx  
13610 N. 111th Ave.  
Sun City, AZ 85351  
[aimtodogood@gmail.com](mailto:aimtodogood@gmail.com)  
*Attorneys for Plaintiff*

By: /s/ Vanessa Tokosch

# Exhibit A

Fee App - Time Details and Total

Date	Timekeeper	Hourly ("H")/ Flat Fee Code	Units	Rate	Value	Narrative
6/25/2025	CHO	H	.80	225.00	180.00	Begin outline for Motion to Dismiss Gottmann and Anderson pursuant to Judge's invitation to seek the dismissal of Gottmann and Anderson in his Ruling.
6/25/2025	SNH	H	.20	95.00	19.00	Review of Court ruling for identification of court ordered deadlines and next steps in litigation
6/26/2025	CHO	H	.70	225.00	157.50	Telephonic conference with Association President to discuss disclosure statement, ruling and next steps.
6/26/2025	CHO	H	.90	225.00	202.50	Review proposed statement from the Association regarding the Court's rulings on the injunction and the Motion to dismiss and make revisions and edits.
6/30/2025	CHO	H	1.80	225.00	405.00	Continue to work on draft of Motion to Dismiss Gottmann and Anderson.
7/2/2025	CHO	H	3.20	225.00	720.00	Continue with draft of Motion to Dismiss Gottmann and Anderson.
7/3/2025	CHO	H	1.70	225.00	382.50	Continue with draft of motion to dismiss the directors from Marx's complaint.
7/3/2025	SNH	H	.30	95.00	28.50	Prepare draft Motion to Dismiss Defendants Gottman and Anderson
7/7/2025	CHO	H	1.30	225.00	292.50	Continue with draft of motion to dismiss directors and inclusions of citations to Marx's 122 page complaint.
7/8/2025	CHO	H	1.70	225.00	382.50	Continue with preparation and revisions to motion to dismiss directors.
7/9/2025	CHO	H	.20	225.00	45.00	Draft, revise and send order to D. Gottmann.
7/9/2025	CHO	H	1.60	225.00	360.00	Make additional revisions to Motion to Dismiss Directors and conduct difficult review of citations to the 122 page complaint.
7/10/2025	CHO	H	.80	225.00	180.00	Conduct in-depth review of Plaintiff's complaint, application for TRO and injunction, and responses and replies to various motions for additional arguments in support of Motion to Dismiss the board members.

Fee App - Time Details and Total

Date	Timekeeper	Hourly ("H")/ Flat Fee Code	Units	Rate	Value	Narrative
7/11/2025	AAB	H	.30	200.00	60.00	Review partner drafted motion to dismiss individual Defendant Board Members.
7/11/2025	CHO	H	.50	225.00	112.50	Make additional revisions to Motion to Dismiss the Directors. Make additional revisions to Motion to Dismiss Gottman and Anderson and analyze potential exhibits to same.
7/14/2025	CHO	H	.70	225.00	157.50	Reviewed partner drafted motion to dismiss individual plaintiffs.
7/15/2025	AAB	H	.40	200.00	80.00	Finalize and prepare Motion to Dismiss Directors for submission to the court.
7/15/2025	CHO	H	.60	225.00	135.00	Conclude revisions of Motion to Dismiss Defendants Mark Gottman and Dennis Anderson for submission with clerk of court and copy to Plaintiff Marx.
7/15/2025	SNH	H	.20	95.00	19.00	Revise Motion to Dismiss Defendants Gottman and Anderson.
7/25/2025	CHO	H	.80	225.00	180.00	Begin review of Reply In Support of Motion to Dismiss and identify additional arguments.
7/28/2025	CHO	H	.50	225.00	112.50	Make revisions to the latest draft of Reply in support of Motion to Dismiss Directors. Review and analyze Reply in support of Motion to Dismiss Directors and analyze cited case law and statutes to ensure accuracy.
7/28/2025	CHO	H	.80	225.00	180.00	Conclude revisions to Defendant's Reply to Plaintiffs Response to Motion to Dismiss Defendants Mark Gottman and Dennis Anderson for submission with Clerk of Court
7/29/2025	SNH	H	.30	95.00	28.50	Review and analyze ruling from Court on the Motion to Dismiss Gottmann and Anderson.
8/5/2025	CHO	H	.20	225.00	45.00	Review and analyze Court's ruling on Motion to Dismiss directors and begin review of attorneys' fees incurred pursuant to Court's invitation to submit a fee application.
8/5/2025	CHO	H	.30	225.00	67.50	

Fee App - Time Details and Total

Date	Timekeeper	Hourly ("H")/ Flat Fee Code	Units	Rate	Value	Narrative
8/5/2025	SNH	H	.20	95.00	19.00	Review of Minute Entry granting Motion to Dismiss Directors to update case docket and entry of deadlines for Application for Attorneys fees pursuant to Court Order
8/12/2025	CHO	H	.30	225.00	67.50	Forward Marx's Motion for Reconsideration to Association President with analysis. Begin review of invoices to determine which apply to work on the Motion to Dismiss Anderson and Gottmann in support of application for fees.
8/13/2025	CHO	H	1.30	225.00	292.50	Review and analyze court order denying Marx's Motion for Reconsideration
8/14/2025	CHO	H	.20	225.00	45.00	Conduct analysis of propriety of leaving and amending claims against Gottmann and Anderson when they were previously dismissed from case but no formal order given.
8/18/2025	CHO	H	.70	225.00	157.20	Drafted application for attorneys fees following favorable ruling on motion to dismiss individual Board members
8/25/2025	AAB		1.50	200.00	300.00	Reviewed fee report regarding the motion to dismiss in anticipation of drafting fee application after successful motion to dismiss individual defendants from the action.
8/27/2025	AAB	H	.50	200.00	100.00	Drafted proposed order for attorney fees and costs.
8/27/2025	AAB	H	.50	200.00	100.00	Draft affidavit in support of application for attorneys fees.
8/28/2025	AAB	H	.50	200.00	100.00	Review latest draft of Application and Affidavit in support of attorneys' fees.
9/4/2025	CHO	H	.40	225.00	90.00	Make revisions to Application and Affidavit of fees.
9/4/2025	CHO	H	.60	225.00	135.00	
Total						5,957.70