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Attorneys at Law

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6 AFI.HILTONC.03

Attorneys for Defendant

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

9 R.L. WHITMER, an individual,

10 Plaintiff,

11 vs.

12 HILTON CASITAS HOMEOWNERS
13 ASSOCIATION, also known as HILTON
14 CASITAS COUNCIL OF HOMEOWNERS,
15 also known as COUNCIL OF CO-
OWNERS, also known as HILTON
CASITAS COUNCIL OF CO-OWNERS, an
Arizona nonprofit corporation,

16 Defendant.

Case No. CV2022-014709

**DEFENDANT'S APPLICATION FOR
ATTORNEYS' FEES AND COSTS**

(Assigned to the Hon. John C. Rea)

17 Defendant Hilton Casitas Council of Homeowners, pursuant to Rules 54(f) and (g),
18 *Ariz.R.Civ.P.*, and A.R.S. §§12-341.01, 12-341, and/or 12-349, hereby submits its Application for
19 Attorneys' Fees and Costs ("Application"). The Association submits this Application
20 contemporaneously with a Statement of Costs and a proposed final judgment.
21

22 The Association fully prevailed on its Motion to Dismiss Amended Petition for a Show
23 Cause Hearing re Contempt ("Motion") pursuant to the minute entry entered on February 24,
24

1 2023. As such, it is the successful party in this civil action for the requisite award of the costs
2 incurred as reflected in the Statement of Costs filed contemporaneously herewith. *See* A.R.S.
3 §12-341. Given that the ruling ended in dismissal of the civil action in its entirety, the
4 Association is also the successful party for the purposes of A.R.S. §12-341.01 for obtaining the
5 relief sought in the Motion.
6

7 In the Motion, the Association preserved its request for an award of attorneys’ fees
8 pursuant to A.R.S. §§12-349 and/or 12-341.01. Both the original pleadings filed and Plaintiff’s
9 Response to Defendant’s Motion to Dismiss Amended Petition for a Show Cause Hearing re
10 Contempt (“Response”) cite to A.R.S. §§12-341.01 and 12-341 in support of an award of fees
11 and costs. *See* Plaintiff’s Motion for Order to Show Cause Hearing filed on November 4, 2022 at
12 4; Motion at 11; Response at 6. Thus, neither party disputes that this action arises out of the
13 underlying contract between the parties, which is the Declaration of Horizontal Property Regime
14 for Hilton Casitas¹. *See Powell v. Washburn*, 211 Ariz. 553, 555, ¶8 (2006). As a result, the
15 action is rooted in the contractual obligations created for the parties in the Declaration, and the
16 Association was the successful party given the ruling on its Motion for the purposes of A.R.S. 12-
17 341.01. *See* Minute Entry entered on February 24, 2023.
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21 Furthermore, A.R.S. §§12-349(A)(1) and (2) provide this Court with discretion to award
22 attorneys’ fees and expenses if the petition was brought without substantial justification or for the
23 sole purpose of harassment. Plaintiff brought the allegations in this matter in November 2022 to
24

25 ¹ Recorded in the official records of Maricopa County Recorder’s Office on May 22, 1972 at
26 Docket 9448, Page 790.

1 challenge the Association’s expenditures back in July 2021. Mr. Whitmer has a history of
2 bringing these types of lawsuits against the Association. *See* Motion at 9, Exhibit B, Page 2,
3 Lines 14-2 and Page 3.² Here, Mr. Whitmer never alleged how, if at all, he personally was
4 damaged by the Association’s expenditures; any alleged damages would have been no different
5 from those of any other member of the Association. Accordingly, the Court also can rely upon
6 A.R.S. §§12-349(A)(1) and (2) to award attorneys’ fees to the Association.
7

8
9 Attached as **Exhibit 1**, is a Declaration in support of this Application. Attached to the
10 Declaration as **Exhibit 1-A** thereto are the fees and costs the Association incurred in defending
11 against this lawsuit. The spreadsheets contain the date the service was rendered, the attorney
12 rendering the service, the task completed, the amount of time spent on the task, the hourly rate,
13 and the total fee for each individual task. Pursuant to Arizona law, there is a presumption that
14 all attorneys’ fees and costs incurred by the Association, as supported by the Declaration, are
15 reasonable. *See Schweiger v. China Doll Restaurant, Inc.*, 138 Ariz. 183 (App. 1983); *State of*
16 *Arizona, ex rel., Corbin v. Tocco*, 173 Ariz. 587 (App. 1992). Absent a specific evidentiary
17 showing that the amount requested is unreasonable, and not merely a broad challenge to this
18 Application, the Association is entitled to all of its attorneys’ fees and costs incurred. *State of*
19 *Arizona, ex rel., Corbin*, 173 Ariz. at 594; *see also* A.R.S. §§12-341 and 12-341.01.
20
21
22
23
24

25 ² Please note: the Presiding Judge in Maricopa County Superior Court has not endorsed the
26 referenced vexatious litigant order.

1 Pursuant to the foregoing, the amounts reflected in the Declaration attached hereto as
2 **Exhibit 1-A**, and the Statement of Costs filed contemporaneously herewith, the Association
3 requests an award of \$8,423.50 in reasonable attorneys' fees and \$308.19 in costs.
4

5 RESPECTFULLY SUBMITTED this 16th day of March, 2023.

6 **CARPENTER, HAZLEWOOD, DELGADO & BOLEN, LLP**

7
8 By: /s/Maria McKee
9 Edith I. Rudder, Esq.
10 Maria G. McKee, Esq.
11 1400 East Southern Avenue, Suite 400
12 Tempe, Arizona 85282-5691
13 *Attorneys for Defendant*

14 **ORIGINAL** of the foregoing e-filed
15 this 16th day of March, 2023 with:

16 Clerk of the Court
17 Maricopa County Superior Court

18 **COPY** of the foregoing emailed and
19 served via the TurboCourt system
20 this 16th day of March 2023, to:

21 Ross P. Meyer
22 Meyer & Partners, PLLC
23 3104 E. Camelback Road #2562
24 Phoenix, Arizona 85016
25 ross@meyerpllc.com
26 *Attorney for Plaintiff*

By: /s/ Suzanne Hilborn

Exhibit 1



1 **CARPENTER, HAZLEWOOD, DELGADO & BOLEN, LLP**

2 Attorneys at Law
3 1400 E. Southern Ave., Suite 400
4 Tempe, Arizona 85282-5691
5 (480) 427-2800, Facsimile (480) 427-2801
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7 Edith I Rudder - 020560
8 eadie.rudder@carpenterhazlewood.com
9 Maria G. McKee - 034659
10 maria.mckee@carpenterhazlewood.com
11 AFI.HILTONC.03
12 Attorneys for Defendant

13 **IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**
14 **IN AND FOR THE COUNTY OF MARICOPA**

15 R.L. Whitmer, an individual,
16
17 Plaintiff,

18 vs.

19 HILTON CASITAS HOMEOWNERS
20 ASSOCIATION, also known as HILTON
21 CASITAS COUNCIL OF HOMEOWNERS,
22 also known as COUNCIL OF CO-
23 OWNERS, also known as HILTON
24 CASITAS COUNCIL OF CO-OWNERS, an
Arizona nonprofit corporation,
Defendant.

Case No. CV2022-014709

**DECLARATION OF
MARIA G. MCKEE**

(Assigned to the Hon. John C. Rea)

I, Maria G. McKee, hereby state:

1. I am an attorney at Carpenter, Hazlewood, Delgado and Bolen, LLP, the firm representing the Defendant, Hilton Casitas Homeowners Association, in the above-entitled matter, and make this declaration in support of the Association's Application for Attorneys' Fees and Costs.

Exhibit 1-A



Fee App - Time Details and Total

Date	Timekeeper	Units	Rate	Value	Narrative
11/16/2022	EIR	.20	200.00	40.00	Review communication from Chuck Ledbetter, claims adjuster, with new case involving the Order to Show Cause where Whitmer is trying to enforce the Administrative Law Judge 2022 decision that is not yet final.
11/16/2022	EIR	.20	200.00	40.00	Draft communication to Quentin Phillips, General Counsel, that we were retained to handle the Order to Show Cause so his firm does not need to appear.
11/16/2022	EIR	.20	200.00	40.00	Review communication from Ross Meyer, Plaintiff's counsel, and the attached Affidavit of Service to confirm proper service.
11/17/2022	EIR	.20	200.00	40.00	Review and revise proposed Notice of Appearance.
11/17/2022	EIR	1.10	200.00	220.00	Review new case, including the Motion for Order to Show Cause and accompanying paperwork including the analysis of the financials to reveal that the allegations in the Order to Show Cause are based on faulty logic and evidence.
11/17/2022	EIR	.80	200.00	160.00	Discuss new matter with Quentin Phillips, General Counsel, to get history of specific allegations and strategize on how to respond.
11/18/2022	EIR	.50	200.00	100.00	Appear at the Order to Show Cause return hearing.
11/18/2022	EIR	.40	200.00	80.00	Review and respond to communication from Ross Meyer, Plaintiff's counsel, related to the Association's history with Whitmer and issues related to his pleadings, including but not limited to, the allegations of how much more the Association allegedly paid in attorneys' fees versus reality and related issues.
11/16/2022	MGM	.20	200.00	40.00	Email opposing counsel, Ross Meyer, regarding our representation of the Association and request for Certificate of Service.
11/17/2022	MGM	1.10	200.00	220.00	Comprehensive review of Complaint, Motion for Order to Show Cause Hearing, and all accompanying documents and pleadings filed by Plaintiff, R.L. Whitmer.
11/17/2022	MGM	.60	200.00	120.00	Prepare for Order to Show Cause Hearing scheduled for November 18, 2022 at 2:30 P.M.
11/17/2022	MGM	.80	200.00	160.00	Continue preparing for Order to Show Cause Hearing by outlining arguments to be made based on the facts at issue and addressing legal basis for requested relief purported by Plaintiff in the pleadings.
11/18/2022	MGM	.50	200.00	100.00	Attend and participate in Order to Show Cause Hearing pursuant to Court order.
11/22/2022	MGM	.20	200.00	40.00	Email opposing counsel, Ross Meyer, regarding confirmation of the scope of his representation in light of R.L. Whitmer's other pending matters.
11/23/2022	MGM	.80	200.00	160.00	Draft letter to client regarding claims made and scope of representation in defense of such claims.
11/23/2022	MGM	.80	200.00	160.00	Draft litigation preservation letter to client to preserve all evidence in light of new litigation case.
11/23/2022	MGM	.40	200.00	80.00	Prepare revised statutory memorandum to incorporate this new claim for purposes of statutory disclosure.
11/23/2022	MGM	.80	200.00	160.00	Prepare electronic preservation letter to opposing counsel, Ross Meyer, to preserve all evidence in light of newly filed case.
11/28/2022	MGM	.30	200.00	60.00	Draft comprehensive email updating the Association on the current status of the pending claim and next steps.
11/30/2022	MGM	.10	200.00	20.00	Review minute entry issued by the Court as a result of the Order to Show Cause Hearing on November 18, 2022.
11/30/2022	MGM	.30	200.00	60.00	Draft comprehensive email to the Association regarding minute entry issued by the Court as a result of the Order to Show Cause Hearing on November 18, 2022, including next steps.
11/29/2022	EIR	.20	200.00	40.00	Review pending matter and determine the next steps, including the Motion to Dismiss the Order to Show Cause if counsel for Whitmer refuses to voluntarily withdraw based upon possible Rule 11 issues with their filing.
11/16/2022	SNH	.30	95.00	28.50	Review of initial case documents including Complaint.
11/16/2022	SNH	.30	95.00	28.50	Prepare initial pleading document and draft Notice of Appearance
11/17/2022	SNH	.20	95.00	19.00	Preservation of Affidavit of Service and processing of same for identification of deadline for answer to complaint.
11/30/2022	SNH	.20	95.00	19.00	Review and preservation of Minute Entry denying Plaintiff's Request for Evidentiary Hearing
12/5/2022	EIR	.30	200.00	60.00	Telephone conference with Ross Meyer, Plaintiff's counsel, on the meet and confer required by the Court, including discussion of a global settlement to address all claims and related issues.
12/6/2022	EIR	.20	200.00	40.00	Review pending matter, including previous discussion with Ross Meyer, Plaintiff's counsel, and need to prepare report to the Court regarding same.
12/6/2022	EIR	.20	200.00	40.00	Review the Minute Entry Order subsequent to the Order to Show Cause before Judge Mikitish.
12/2/2022	EIR	.20	200.00	40.00	Review communications from Ross Meyer, Plaintiff's counsel, related to the Court ordered "meet and confer" related to Plaintiff's Order to Show Cause and possible resolution.
12/5/2022	EIR	.20	200.00	40.00	Review communication from Quentin Phillips, General Counsel, with new demands from Whitmer regarding financials.
12/6/2022	EIR	.20	200.00	40.00	Review detailed communication from Ross Meyer, Plaintiff's counsel, regarding issues in pending case and argument for why Plaintiff's Order to Show Cause should be entered.

Fee App - Time Details and Total

Date	Timekeeper	Units	Rate	Value	Narrative
12/8/2022	EIR	.30	200.00	60.00	Review and revise proposed detailed communication to Ross Meyer, Plaintiff's counsel, related to his communication as to why Plaintiffs' Order to Show Cause should be granted.
12/8/2022	EIR	.30	200.00	60.00	Review and revise proposed Joint Report regarding "meet and confer" with opposing counsel as required by the Court's Order.
12/9/2022	EIR	.20	200.00	40.00	Review communication from Ross Meyer, Plaintiff's counsel, disputing the Association's position in relation to the allegations of the Order to Show Cause.
12/9/2022	EIR	.20	200.00	40.00	Draft response to communication from Quentin Phillips, General Counsel, with new demands from Whitmer regarding financials.
12/12/2022	EIR	.90	200.00	180.00	Review detailed communication and attachments from Ross Meyer, Plaintiff's counsel, related to his client's claims that the Board went over budget and is required to comply with the statute going forward.
12/12/2022	EIR	.40	200.00	80.00	Review and revise proposed Joint Report to Court on meet and confer ordered at Order to Show Cause return hearing.
12/12/2022	EIR	.20	200.00	40.00	Review and revise proposed statutory memo required under A.R.S. §33-1260(A)(7).
12/12/2022	EIR	.20	200.00	40.00	Review and revise litigation hold letter to opposing counsel.
12/12/2022	EIR	.20	200.00	40.00	Review and revise litigation hold letter to client.
12/12/2022	EIR	.20	200.00	40.00	Review and revise representation letter to client.
12/12/2022	EIR	.40	200.00	80.00	Review and revise proposed communication to the Board with update on all pending cases.
12/13/2022	EIR	.40	200.00	80.00	Review financial information received from the Association's General Counsel in response to Plaintiff's most recent records request.
12/13/2022	EIR	.30	200.00	60.00	Review several videos of an encounter between Whitmer and another Association member which might rise to the level of aggravated assault with a vehicle.
12/13/2022	EIR	.30	200.00	60.00	Review pending matter, including possible next steps Plaintiff might make to expand on the pending matter, including how he might expand the allegations through an Amended Petition/Motion for Order to Show Cause.
12/1/2022	MGM	.20	200.00	40.00	Email opposing counsel, Ross Meyer, in response to request regarding court-ordered telephonic meet and confer.
12/5/2022	MGM	.30	200.00	60.00	Attend telephonic meet and confer with opposing counsel pursuant to Court's order for the same, and took copious notes throughout.
12/5/2022	MGM	.20	200.00	40.00	Email opposing counsel, Ross Meyer, regarding documents requested prior to discovery phase of the litigation.
12/7/2022	MGM	.20	200.00	40.00	Email opposing counsel, Ross Meyer, to follow up regarding confirmation of the scope of his representation in light of R.L. Whitmer's other pending matters.
12/8/2022	MGM	.50	200.00	100.00	Draft comprehensive response to email from opposing counsel, Ross Meyer, regarding the factual and legal issues presented therein.
12/8/2022	MGM	.50	200.00	100.00	Draft proposed Joint Statement ordered by the Court to be submitted by December 12, 2022.
12/12/2022	MGM	.50	200.00	100.00	Review and analyze comprehensive email from opposing counsel, Ross Meyer, regarding miscalculations contained in the Complaint and interpretation of applicable statute.
12/12/2022	MGM	.20	200.00	40.00	Revise proposed joint statement for submitting to the Court in response to email from opposing counsel, Ross Meyer, with proposed updates to the same.
12/12/2022	MGM	.20	200.00	40.00	Email opposing counsel, Ross Meyer, regarding proposed joint statement updates in response to his input.
12/20/2022	MGM	.20	200.00	40.00	Email Board Members for the Association, Curtis Roberts and Robert Westbrook, regarding status update on pending claim and Joint Report submitted to the Court.
12/20/2022	MGM	.20	200.00	40.00	Email Board Members for the Association and general counsel for the Association regarding statutory memorandum, litigation hold letter, and letter of representation.
12/30/2022	MGM	.20	200.00	40.00	Telephone call with opposing counsel, Ross Meyer, regarding amended pleadings and next steps in the litigation.
12/29/2022	MGM	.20	200.00	40.00	Email opposing counsel, Ross Meyer, in response to inquiry regarding meet and confer to discuss his intention for amending Plaintiff's pleadings.
12/12/2022	SNH	.20	95.00	19.00	Preservation of SB1148 RE Department of fire, building and life safety; establishment; purposes; components and list of HOA cases before OAH regarding Department of Fire 2012 to 2016.
12/12/2022	SNH	.20	95.00	19.00	Review of opposing counsel, Ross Meyer's additions to Joint Statement and revise same for attorney approval.
12/12/2022	SNH	.30	95.00	28.50	Finalize Joint Statement and processing of same with Maricopa County Clerk of Superior Court and opposing counsel.
12/21/2022	SNH	.30	95.00	28.50	Finalize and processing of Litigation Hold letter to opposing counsel, Ross Meyer by email and U.S. mail
1/2/2023	EIR	.20	200.00	40.00	Review communication from Ross Meyer, Plaintiff's counsel, regarding his intent to file an Amended Petition for Contempt.
1/2/2023	EIR	.20	200.00	40.00	Review communications from Ross Meyer, Plaintiff's counsel, following up on his filing of the Amended Petition for Contempt.
1/2/2023	EIR	.20	200.00	40.00	Review communication from Robert Westbrook with additional communications from Whitmer regarding his assault upon Mike Bengson.

Fee App - Time Details and Total

Date	Timekeeper	Units	Rate	Value	Narrative
1/3/2023	EIR	.20	200.00	40.00	Review and consider pending matter, including opposing counsel's filing of the Amended Petition for Contempt, to determine the next steps in defending the Association regarding same.
1/10/2023	EIR	.20	200.00	40.00	Review pending matter to determine next steps in defense in light of the Amended Petition recently filed by Whitmer's attorney.
1/4/2023	EIR	.30	200.00	60.00	Review Plaintiff's Amended Petition for Order to Show Cause.
1/17/2023	EIR	1.90	200.00	380.00	Review and revise proposed Motion to Dismiss for Plaintiff's Order to Show Cause and Amended Petition.
1/17/2023	EIR	.20	200.00	40.00	Review pending matter to determine next steps in defense in light of upcoming deadline to respond to Plaintiff's Amended Petition for Order to Show Cause for Contempt.
1/23/2023	EIR	.20	200.00	40.00	Review communication from Robert Westbrook, Board President, with communication from certain members regarding pending litigation.
1/23/2023	EIR	.20	200.00	40.00	Review communication from the Association's counsel, Sam Richardson, regarding communication from Robert Westbrook, Board President, with communication from certain members regarding pending litigation.
1/26/2023	EIR	.20	200.00	40.00	Review communication from the Court setting Oral Argument on the Association's Motion to Dismiss.
1/26/2023	EIR	.20	200.00	40.00	Review notice of Oral Argument from the Court.
1/30/2023	EIR	.20	200.00	40.00	Review the Court's Minute Entry Order setting a status conference for the parties' Joint Statement and Plaintiff's Amended Petition for Order to Show Cause.
1/31/2023	EIR	.20	200.00	40.00	Review pending matter to determine the next steps in defending the Association, including issues with status conference ordered by the Court, conflicts, Plaintiff's response deadline and related issues.
1/18/2023	MGM	1.10	200.00	220.00	Continue drafting Motion to Dismiss Amended Petition to create final version for submitting to the Court.
1/18/2023	MGM	.20	200.00	40.00	Email the Association's Board Members regarding the Motion to Dismiss Mr. Whitmer's Amended Petition, filed on January 18, 2023.
1/18/2023	MGM	.20	200.00	40.00	Draft Certificate of Good Faith Consultation for the Association's Motion to Dismiss in order to comply with requirements in the Arizona Rules of Civil Procedure.
1/18/2023	SNH	.50	95.00	47.50	Finalize Motion to Dismiss Amended Petition for a Show Cause Hearing RE Contempt with exhibits and processing of same with Clerk of Maricopa County Superior Court and Ross Meyer.
1/23/2023	SNH	.20	95.00	19.00	Obtain conformed copy and preservation of Good Faith Consultation Certificate RE Motion to Dismiss
1/23/2023	SNH	.20	95.00	19.00	Obtain conformed copy and preservation of Motion to Dismiss Amended Petition for a Show Cause Hearing RE Contempt
1/30/2023	SNH	.20	95.00	19.00	Preservation of Minute Entry RE Status Conference Set.
2/1/2023	EIR	.20	200.00	40.00	Review the Court's Notice of Virtual Status Conference.
2/6/2023	EIR	.50	200.00	100.00	Review Plaintiff's Response to the Association's Motion to Dismiss Amended Petition for Order to Show Cause and exhibits he did not previously disclose.
2/7/2023	EIR	.20	200.00	40.00	Review pending matter to determine the next steps in defending the Association, including upcoming status conference and reply in support of the Association's Motion to Dismiss.
2/13/2023	EIR	.20	200.00	40.00	Review and revise proposed Stipulation to Extend Deadline for Reply and form of Order granting same.
2/16/2023	EIR	1.60	200.00	320.00	Review and revise proposed Reply in support of the Association's Motion to Dismiss.
2/13/2023	EIR	.20	200.00	40.00	Review multiple communications from Ross Meyer, Plaintiff's counsel, negotiating more time to respond to Motion to Dismiss.
2/13/2023	EIR	.20	200.00	40.00	Review and revise proposed Notice of First Extension.
2/13/2023	EIR	.20	200.00	40.00	Review and revise proposed form of Order granting Notice of First Extension.
2/17/2023	EIR	.20	200.00	40.00	Review the Court's Order granting extension for reply with modifications.
2/17/2023	EIR	.20	200.00	40.00	Attend Status Conference ordered by the Court after the Association filed its Motion to Dismiss.
2/14/2023	EIR	.20	200.00	40.00	Review pending matter to determine the next steps in defending the Association, including newly assigned Commissioner Rea and possible reasons he called for a status conference.
2/21/2023	EIR	.20	200.00	40.00	Review pending matter to determine the next steps in defending the Association, including preparing for possible evidentiary hearing.
2/21/2023	EIR	.20	200.00	40.00	Review the court's Minute Entry Order from status conference.
2/24/2023	EIR	.30	200.00	60.00	Review and consider the Court's ruling on the Association's Motion to Dismiss on Petitioner's Amended Petition for Contempt.
2/25/2023	EIR	1.10	200.00	220.00	Prepared detailed update to Chuck Ledbetter, claims adjuster, regarding pending matter and next steps in defending the Association in light of the favorable decision from the Court.
2/13/2023	SNH	.30	95.00	28.50	Finalize and processing of Expedited Stipulated Notice of First Extension of Time to File Reply in Support of Respondent's Motion to Dismiss and Proposed Order with Clerk of Maricopa County Superior Court.

Fee App - Time Details and Total

Date	Timekeeper	Units	Rate	Value	Narrative
2/13/2023	SNH	.30	95.00	28.50	Telephone call with Iris Ramirez, Assistant to Sr. Commissioner John Rea regarding Expedited Notice of First Extension and email correspondence in response to submission of Notice and Commissioner's granting of same.
2/16/2023	SNH	.30	95.00	28.50	Revise, finalize and processing of Reply in Support of Motion to Dismiss and exhibit with Maricopa County Superior Court and to opposing counsel, Ross Meyer.
2/17/2023	SNH	.20	95.00	19.00	Preservation of Order Granting Expedited Stipulation to Extend Deadline for Respondent to File Reply in Support of Motion to Dismiss
2/22/2023	SNH	.20	95.00	19.00	Preservation of Minute Entry Regarding virtual Status Conference
2/24/2023	SNH	.20	95.00	19.00	Preservation of Minute Entry RE Granting Defendants Motion to Dismiss Amended Petition
2/13/2023	MGM	3.80	200.00	760.00	Draft comprehensive Reply in Support of Respondent's Motion to Dismiss pending Amended Petition for Show Cause Hearing regarding Contempt.
2/16/2023	MGM	.30	200.00	60.00	Revise Reply in Support of the Association's Motion to Dismiss Plaintiff's First Amended Petition.
2/17/2023	MGM	.20	200.00	40.00	Attend and participate in virtual status conference with opposing counsel and the assigned Judge.
2/24/2023	MGM	.20	200.00	40.00	Email Board President, Robert Westbrook, regarding the Court's ruling on the Association's Motion to Dismiss and next steps.
3/13/2023	MGM	.60	200.00	120.00	Draft Defendant's Application for Attorneys' Fees and Costs.
3/13/2023	MGM	.40	200.00	80.00	Draft Declaration of Maria McKee in support of Association's Application for Attorneys' Fees and Costs.
3/13/2023	MGM	.20	200.00	40.00	Draft Defendant's Statement of Costs.
3/13/2023	MGM	.50	200.00	100.00	Draft proposed Final Judgment awarding attorneys' fees and costs to the Association and Notice of Lodging the same.
3/15/2023	EIR	.20	200.00	40.00	Review and revise proposed Statement of Costs.
3/15/2023	EIR	.50	200.00	100.00	Review and revise proposed Application for Attorneys' Fees and Costs.
3/15/2023	EIR	.40	200.00	80.00	Review and revise proposed Declaration of Maria McKee in support of the Association's Application for Attorneys' Fees and Costs.
3/15/2023	EIR	.40	200.00	80.00	Review and revise proposed form of Final Judgment awarding attorneys' fees and costs to the Association and Notice of Lodging same.
3/16/2023	SNH	.70	95.00	66.50	Finalize Application for Attorneys' Fees and Costs, Statement of Costs, Accompanying Declaration in Support of Application, and Proposed Final Judgment and Notice of Lodging for filing.
3/16/2023		44.90		8,423.50	

Fee App - Cost Details and Total

Date	Payee	Description	Rate	Value
11/17/2022	TurboCourt	Filing Fee	259.05	259.05
12/12/2022	TurboCourt	Filing Fee	6.70	6.70
1/18/2023	TurboCourt	Filing Fee	10.61	10.61
1/19/2023	TurboCourt	Filing Fee	10.61	10.61
2/13/2023	TurboCourt	Filing Fee	10.61	10.61
2/16/2023	TurboCourt	Filing Fee	10.61	10.61
3/13/2023		TOTAL	.00	308.19