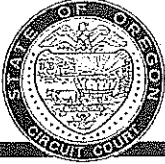


**Circuit Court of the State of Oregon  
for Jackson County**



Jackson County Justice Building – 100 S. Oakdale, Medford, OR 97501  
Telephone (541) 776-7171

FAX (541) 776-7057

Tim Gerking, Judge

June 30, 2015

ROBERT BONAPARTE  
1500 SW 1<sup>st</sup> Ave., Ste.765  
Portland, OR 97201

ERIC DAHLIN  
1300 SW 5<sup>th</sup> Ave., Ste.2400  
Portland, OR 97201

ROBERT MAY  
732 NW 19<sup>th</sup> Ave  
Portland, OR 97209

**Case No#:** 093201E3  
**Case Name:** Thom Martin, dba South Stage Inn and Resort v.  
Oregon Mutual Insurance Company

Dear Counsel:

Please find my Findings and Conclusions of Law re: Fees and Costs attached.

Mr. Bonaparte will prepare and submit the Supplemental Judgment.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy C. Gerking".

Hon. Timothy C. Gerking  
Circuit Court Judge

RECEIVED AND FILED  
2015 JUN 30 AM 8:47  
JACKSON COUNTY COURTS  
DOCKETED BY \_\_\_\_\_

IN THE CIRCUIT COURT OF THE STATE OF OREGON FOR JACKSON COUNTY

THOM MARTIN, doing business as  
SOUTH STAGE INN AND RESORT,

Plaintiff,

v.

OREGON MUTUAL INSURANCE  
COMPANY, an insurance company,

Defendant.

Case No. 093201E3

**FINDINGS OF FACT AND  
CONCLUSIONS OF LAW  
Re: FEES AND COSTS**

NATIONSTAR MORTGAGE, LLC,

Plaintiff in Intervention,

v.

OREGON MUTUAL INSURANCE COMPANY,  
an insurance mortgage company, and THOM  
MARTIN, doing business as SOUTH STAGE  
INN AND RESORT,

Defendants in Intervention,

**I. ATTORNEY FEES**

**A. ENTITLEMENT**

1.) Conclusion of law: Plaintiff Martin is entitled to attorney fees under ORS 742.061.

a.) Findings of fact:

- i. Plaintiff timely filed proof of loss with OMI;
- ii. Plaintiff brought an action against OMI for its failure to settle the claim;
- iii. OMI did not settle the claim within 6 months of the proof of loss;

1 iv. Plaintiff's ultimate recovery by stipulated judgment exceeds the amount of  
2 OMI's tender (\$0).

3 2.) Conclusion of law: Intervenor Nationstar is not entitled to attorney fees.

4 a.) Findings of fact:

5 The Court agrees with and adopts the objections and reasoning contained in  
6 OMI's objections at pp. 6-9. Nevertheless, if the Court is determined to be  
7 incorrect should this issue be appealed, Nationstar's attorney fees are to be  
8 awarded as set forth in these findings. In other words, these are the fees I  
9 would have awarded if I had found that Nationstar was entitled to recover fees  
10 under ORS 742.061.

11 B. AMOUNT

12 1. Conclusion of law: Attorney fee awards under Oregon law are generally made in  
13 reference to the factors listed in ORS 20.075(2)(a-h).

14 a.) Findings of fact:

15 i.) Time and labor [20.075(2)(a)]

- 16 • Richard Stark reasonably expended 507.25 hours of the 527.25 hours  
17 claimed (after reduction of 146.5 hours as set forth in Ex A to Plaintiff's  
18 Reply) from the original total of 673.75 hours claimed. See also Ex.1  
19 attached hereto.
- 20 • Sandra Sawyer reasonably expended 111.85 hours of the 138.75  
21 hours claimed (after reduction of 27.4 hours as set forth in Ex A to  
22 Plaintiff's Reply) from the original total of 139.25 hours claimed. See  
23 also Ex.1 attached hereto.
- 24 • Larry Hammack reasonably expended 25.0 hours of the 39.25 hours  
25 claimed. Hours reduced due to unavoidable but unnecessary  
26 duplication.

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- Eric Stark reasonably expended 0 hours of the 3 hours claimed. Time charged deemed to be unnecessary.
- Robert Bonaparte reasonably expended 495.5 hours of the 495.5 hours claimed (after a reduction of 20 hours as set forth on page 7 of Plaintiff's Reply) from the original total of 515.5 hours claimed.
- Brooke Calcagno (legal assistant to Robert Bonaparte) reasonably expended 83.9 hours of the 83.9 hours claimed.
- Joseph Field reasonably expended 38.25 hours of the 48.25 hours claimed (after a reduction of 16 hours (as set forth on page 5 of Plaintiff's Reply) from the original total of 64.25 hours claimed. See also Ex.1 attached hereto.
- Eric Dahlin reasonably expended 238.0 hours of the 327.5 hours claimed.
- Elleanor Chin reasonably expended 7.0 hours of the 11.5 hours claimed.
- Scott Warnick reasonably expended 9.0 hours of the 14.8 hours claimed.
- Linda Oliver reasonably expended 230.0 hours of the 492.1 hours claimed including a reduction of 58.2 hours as set forth on pages 12-13 of Nationstar's Reply.
- Maria Jones reasonably expended 10.0 hours of the 57.9 hours claimed.
- The findings above reflect consideration of OMI's objections, plaintiff's and Nationstar's reply to OMI's objections, and voluntary reductions and corrections to the totals originally claimed.

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- OMI's contention that its opponents' litigation efforts were unnecessary following the initial ruling on summary judgment is rejected. OMI urged the trial court to reverse its ruling by Superbilt motion shortly before trial, and continues to assert that its cancellation notice was effective.
- OMI's contention that its opponents' litigation efforts were unnecessary because of OMI's settlement offers is rejected. OMI offered only \$500,000 in total to Plaintiff at the final December 2014 mediation despite its imminent exposure to a stipulated judgment in excess of \$1,000,000 and a supplemental judgment in excess of \$1,000,000.
- OMI's contention that Richard Stark's litigation efforts relating to Wilshire, Bank of America/Nationstar, Empire Fire & Marine, and Safeco should not be subject to fee-shifting is partially accepted, and Richard Stark's voluntary reduction of \$13,330 (as set forth in Ex.A to Plaintiff's Reply) is accepted.
- OMI's contention that Robert Bonaparte's "getting up to speed" litigation efforts should not be subject to fee-shifting is partially accepted, and Robert Bonaparte's voluntary reduction of \$9,000 is accepted.
- OMI's other objections have been considered, and rejected for the reasons set forth on pages 8-11 of Plaintiff's Reply.
- Additionally, OMI's contention that Plaintiffs' counsel is not entitled to pre-litigation fees is rejected.
- Additionally, the Court finds that many of the alleged unrelated charges were interrelated to fee-bearing charges.
- The Court finds that this case was both sophisticated and complex resulting in some unavoidable duplication and that it was also

**Page 4 – FINDINGS OF FACT AND CONCLUSIONS OF LAW**

1 reasonable for Plaintiff to hire Portland counsel of the stature of  
2 Bonaparte and Fields in order to bring this case to a successful  
3 conclusion.

4 v. Novelty and difficulty [20.075(2)(a)]

- 5 • The case presented an issue of first impression involving the
- 6 effectiveness of OMI's notice of cancellation under ORS 742.702.
- 7 • OMI tenaciously challenged and fought the existence of coverage, and
- 8 indicated in the Stipulated Judgment that it intends to appeal.
- 9 • OMI also tenaciously fought damages.

10 vi. Skill needed [20.075(2)(a)]

- 11 • The case required significant skill to allow plaintiff and Nationstar to
- 12 prevail.

13 vii. Deprivation of services to other clients [20.075(2)(b)]

- 14 • The dispute has been pending for 7 years, necessarily resulting in
- 15 counsel being unable to devote the time expended to other clients.

16 viii. Fee customarily charged in locality [20.075(2)(c)]

- 17 • The findings below reflect consideration of the evidence submitted,
- 18 including the expert opinions presented by attorneys David Paradis, Bill
- 19 Crow, Ron Clark, and Tracy McGovern.
- 20 • OMI's selection of Portland counsel to defend the case was
- 21 presumably based on counsel's insurance coverage expertise, and
- 22 Plaintiff's and Nationstar's selection of Portland counsel was
- 23 appropriate (for Robert Bonaparte, Joe Field and Eric Dahlin).
- 24 • \$ 310/hour is a reasonable rate for Richard Stark.
- 25 • \$ 310/hour is a reasonable rate for Sandra Sawyer.
- 26 • \$ 310/hour is a reasonable rate for Larry Hammack.

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- \$ 0/hour is a reasonable rate for Eric Stark.
- \$ 450/hour is a reasonable rate for Robert Bonaparte.
- \$ 150/hour is a reasonable rate for Brooke Calcagno.
- \$ 395/hour is a reasonable rate for Joseph Field.
- \$ 310/hour is a reasonable rate for Eric Dahlin.
- \$ 310/hour is a reasonable rate for Eileanor Chin.
- \$ 310/hour is a reasonable rate for Scott Warnick.
- \$ 310/hour is a reasonable rate for Linda Oliver.
- \$ 250/hour is a reasonable rate for Maria Jones.

ix. Amount involved and results obtained [20.075(2)(d)]

- A significant judgment was obtained in the amount of \$1,050,000, and which will be increased by a supplemental judgment of attorney fees and prejudgment interest in the total amount of \$ 1,166,033.70.

x. Time limitations imposed by the client [20.075(2)(e)]

- This factor is not applicable.

xi. Nature and length of professional relationship with client [20.075(2)(f)]

- This factor is not applicable.

xii. Experience, reputation and ability of counsel [20.075(2)(h)]

- The quality of the work by counsel in this case, and the expert opinions provided by Plaintiff, establish the significant experience, strong reputation, and high ability of counsel.

xiii. Whether fee is fixed or contingent [20.075(2)(h)]

- Plaintiff's counsel pursued the case for 7 years on a contingency.
- Nationstar's counsel provided services on an hourly basis.

C. MULTIPLIER

1.) Conclusion of law:

1 i.) Martin is entitled to a 20% multiplier (having claimed a 25% multiplier). (not  
2 applicable for paralegal work)

3 a.) Finding of fact:

- 4 • Plaintiff pursued this exceptionally high risk case on a contingency fee, and the  
5 case continues to present a high risk because of OMI's threatened right of  
6 appeal.

7 D. ATTORNEY FEE AWARD

8 1.) Stark & Hammack

- 9 • Richard Stark is entitled to an award of \$ 188,697 reflecting allowance of  
10 507.25 hours at \$ 310/hour plus 20%.
- 11 • Sandra Sawyer is entitled to an award of \$ 41,608 reflecting allowance of  
12 111.85 hours at \$310/hour plus 20%.
- 13 • Larry Hammack is entitled to an award of \$ 9,000 reflecting allowance of 25.0  
14 hours at \$ 300/hour plus 20%.
- 15 • Eric Stark is entitled to an award of \$ 0 reflecting allowance of 0 hours at \$  
16 0/hour.
- 17 • Additional expenses not part of attorney hourly rate, excluding court fees, court  
18 reporter fees and expert fees, in the amount of \$1,208.06.

19 2.) Shenker & Bonaparte

- 20 • Robert Bonaparte is entitled to an award of \$ 267,570 reflecting allowance of  
21 495.5 hours at \$ 450/hour plus 20%.
- 22 • Brooke Calcagno is entitled to an award of \$ 12,668.90 reflecting allowance of  
23 83.9 hours at \$ 150/hour.
- 24 • Additional expenses not part of attorney hourly rate, excluding court fees, in the  
25 amount of \$3,035.39.

26 3.) Field Jerger



- Joseph Field is entitled to an award of \$ 18,130.50 reflecting allowance of 38.25 hours at \$395/hour plus 20%.

4.) Nationstar's Counsel

- Eric Dahlin is entitled to an award of \$ 73,780 reflecting allowance of 238.0 hours at \$395/hour plus 20%.
- Eleanor Chin is entitled to an award of \$ 2,170 reflecting allowance of 7.0 hours at \$ 310/hour (which includes a reduction by Nationstar of \$414 as set forth on page 13 of Nationstar's Reply).
- Scott Warnick is entitled to an award of \$ 2,170 reflecting allowance of 7.0 hours at \$ 310/hour (which includes a reduction by Nationstar of \$503 as set forth on page 13 of Nationstar's Reply).
- Linda Oliver is entitled to an award of \$ 71,300 reflecting allowance of 230.0 hours at \$310/hour (which includes a reduction by Nationstar of \$20,914 as set forth on page 13 of Nationstar's Reply).
- Maria Jones is entitled to an award of \$ 2,500 reflecting allowance of 10.0 hours at \$250/hour (which includes a reduction by Nationstar of \$1,969 as set forth on page 13 of Nationstar's Reply).

**II. COST AND DISBURSEMENTS**

Plaintiff entitled to recover \$2,314.00

**III. PREJUDGMENT INTEREST**

A. ENTITLEMENT

1.) Conclusion of law: Plaintiff Martin and intervenor Nationstar are entitled to prejudgment interest under ORS §82.010 and in accordance with the Stipulated Judgement.

a.) Findings of fact:

- i. The July 17, 2008 fire loss is the trigger date (as conceded by OMI on page 37 (lines 17-19) of its objections).

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B. PREJUDGMENT INTEREST AWARD

Plaintiff Martin and intervenor Nationstar are entitled to \$ 628,359.30 (9% interest on the \$1,050,000 judgment) dating from July 17, 2008 through March 12, 2015. (Date of entry of Stipulated General Judgment)

SO ORDERED:

Dated: June ~~29~~<sup>30</sup>, 2015



HON. TIMOTHY C. GERKING  
CIRCUIT COURT JUDGE

Cc: Robert Bonaparte (email)  
Eric Dahlin (email)  
Robert May (email)

STARK and HAMMACK, P. C.  
ATTORNEYS AT LAW  
100 EAST MAIN STREET, SUITE M  
MEDFORD, OR 97501

Invoice submitted to:  
MR. THOM MARTIN  
59 S. STAGE ROAD  
MEDFORD,, OR 97501

January 26, 2015

RE; MS 2974  
DATE OF FIRE: 7/17/2008  
Invoice # 43745

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
7/28/2008 RAS: E mail to Alice McGee	0.75	\$232.50
Call with Thom	\$310.00/hr	
8/13/2008 RAS: Review of Emails to Safeco	1.75	\$542.50
	\$310.00/hr	
8/14/2008 RAS: Call with Insurance Companies	1.75	\$542.50
Dictation	\$310.00/hr	
Call with Thom		
Review of correspondence		
8/20/2008 RAS: Call with Thom	2.75	\$852.50
Letter to Empire Insurance	\$310.00/hr	
Legal research re: cancellation requirements		
8/21/2008 RAS: Draft letter to Wilshire	0.75	\$232.50
	\$310.00/hr	
8/27/2008 RAS: Teleconference	4.50	\$1,395.00
Dictation	\$310.00/hr	
Call with Thom and Alice		
8/31/2008 RAS: E mail to Alice	0.50	\$155.00
	\$310.00/hr	
9/2/2008 RAS: Work on file	3.75	\$1,162.50
Call with Thom	\$310.00/hr	
9/9/2008 RAS: Letter to Charter	0.25	\$77.50
	\$310.00/hr	
9/12/2008 RAS: Conference and Teleconference with Thom	0.75	\$232.50
	\$310.00/hr	
RAS: Letter to Nagel and Padilla	1.50	\$465.00
Call re: financial's	\$310.00/hr	

	<u>Hrs/Rate</u>	<u>Amount</u>
9/13/2008 RAS: Letter to Ben Street Review of records	1.75 \$310.00/hr	\$542.50
11/18/2008 RAS: Conference with Sandy Sawyer and Thom Review of documents and statute	5.75 \$310.00/hr	\$1,782.50
11/26/2008 RAS: Conference with Thom re: events planned and history, etc.	3.50 \$310.00/hr	\$1,085.00
11/27/2008 RAS: Review of property list and call with Thom	1.50 \$310.00/hr	\$465.00
11/28/2008 RAS: Legal research re: bad faith	1.50 \$310.00/hr	\$465.00
12/3/2008 RAS: Dictation of letter to OMI re: Claim and events planned	1.25 \$310.00/hr	\$387.50
12/10/2008 RAS: Review of letter from Bullivant Letter to Thom Teleconference with Bob Smith	2.75 \$310.00/hr	\$852.50
12/16/2008 RAS: Rob Smith letter - cancellation notices Review of payment record	4.50 \$310.00/hr	\$1,395.00
12/18/2008 RAS: Review: Western States to Thom coverage issues	2.50 \$310.00/hr	\$775.00
12/19/2008 RAS: Conference with Thom and Sandy and Alice Review	5.25 \$310.00/hr	\$1,627.50
12/23/2008 RAS: Review of Thom's documentation	2.50 \$310.00/hr	\$775.00
12/24/2008 RAS: Letter to Medford Police and Fire Departments	1.50 \$310.00/hr	\$465.00
12/29/2008 RAS: Email from Thom and Alice re: personal property	0.50 \$310.00/hr	\$155.00
1/5/2009 RAS: Call with Steve Bonfiglio (Wilshire Bank) Call and letter to Thom and Sandy	0.50 \$310.00/hr	\$155.00
1/7/2009 RAS: Review and fax Steve Bonfiglio's letter to Smith	0.50 \$310.00/hr	\$155.00
1/8/2009 RAS: Review and Dictation Calls with Sandy Legal research	3.75 \$310.00/hr	\$1,162.50
RAS: Calls and correspondence re: Wilshire Call with Sandy	0.50 \$310.00/hr	\$155.00
1/11/2009 RAS: Review letter from Sawyer with Draft Complaint	1.50 \$310.00/hr	\$465.00
1/12/2009 RAS: Letter to Sandy, review of entire file Bob Smith letter to Steve Bonfiglio re: proof of loss	3.50 \$310.00/hr	\$1,085.00
1/13/2009 RAS: Letter to Richard Nagle re: financial records, deposits, etc.	1.50 \$310.00/hr	\$465.00

Ex. 1

MR. THOM MARTIN

Page 3

	<u>Hrs/Rate</u>	<u>Amount</u>
1/14/2009 RAS: Call to Thom re: report on fire and review	3.25 \$310.00/hr	\$1,007.50
1/15/2009 RAS: Letter to Sawyer Review of file Letter to Blackbird	1.50 \$310.00/hr	\$465.00
1/19/2009 RAS: Review response from Blackbird	0.50 \$310.00/hr	\$155.00
1/23/2009 RAS: Review of file Letter to Thom re: letter from Insurance Company's Attorney	2.00 \$310.00/hr	\$620.00
1/26/2009 RAS: Review of Sawyers letter, statutes and policies Conference with Thom	3.25 \$310.00/hr	\$1,007.50
1/27/2009 RAS: Letter to Sandy re: policy issues	0.75 \$310.00/hr	\$232.50
1/29/2009 RAS: Review of Steve Bonfiglio's proposal to Bob Smith	1.25 \$310.00/hr	\$387.50
1/30/2009 RAS: Review Calls to Wilshire	0.50 \$310.00/hr	\$155.00
2/8/2009 RAS: Letter to Sandy re: PLF coverage	0.50 \$310.00/hr	\$155.00
2/10/2009 RAS: Fax to Nagel re financial's, all records and bank statements Review	1.50 \$310.00/hr	\$465.00
2/11/2009 RAS: Review and Dictation	1.50 \$310.00/hr	\$465.00
2/12/2009 RAS: Letter to Nolan - Notice of cancellations and proof of claim Review of Thom's fees	3.00 \$310.00/hr	\$930.00
2/17/2009 RAS: Calls re: lease issues	0.50 \$310.00/hr	\$155.00
2/19/2009 RAS: Review and call with Thom re: accounting records	0.75 \$310.00/hr	\$232.50
2/20/2009 RAS: Review of accounting records Review of old tax returns	2.50 \$310.00/hr	\$775.00
2/23/2009 RAS: Email to Nagel re: business profits and review of financial records	1.00 \$310.00/hr	\$310.00
2/24/2009 RAS: Letter to Sawyer - signed engagement letter Review of Cunningham's letter	1.50 \$310.00/hr	\$465.00
2/26/2009 RAS: Teleconference with and letter from Steve Bonfiglio re: foreclosure	0.75 \$310.00/hr	\$232.50
3/2/2009 RAS: Review of file Legal research re: sale date and legal procedures	3.25 \$310.00/hr	\$1,007.50
3/5/2009 RAS: Review of notes Review of file Letter to Oregon Fire Marshall	1.75 \$310.00/hr	\$542.50
3/9/2009 RAS: Call with Dan Thenell and review payments and notices	0.50 \$310.00/hr	\$155.00

	<u>Hrs/Rate</u>	<u>Amount</u>
3/10/2009 RAS: Review of Safeco policy and returns	2.50	\$775.00
Review of Thenell letter re: foreclosure	\$310.00/hr	
Review of Steve Bonfiglio's letter to Bob Smith		
3/16/2009 RAS: Phone calls with Thenell re: examination under oath	1.00	\$310.00
Review of Thom's previous statements and policy	\$310.00/hr	
3/17/2009 RAS: Email with Sawyer re: records and tax returns	0.50	\$155.00
	\$310.00/hr	
3/18/2009 RAS: Thom schedule for EUO, and review	0.50	\$155.00
	\$310.00/hr	
3/23/2009 RAS: Letter to Thenell re: policy and Trust Deed	1.00	\$310.00
Review	\$310.00/hr	
4/6/2009 RAS: Work on complaint	3.25	\$1,007.50
E mail to OMI's Attorney	\$310.00/hr	
E mail to Wilshire's Attorney		
RAS: Letter re: Thenell's EUO letter to Steve Bonfiglio	0.75	\$232.50
	\$310.00/hr	
4/14/2009 RAS: Legal research re: review of policy	2.50	\$775.00
Emails with bank	\$310.00/hr	
4/15/2009 RAS: Call with Dave Loman	0.25	\$77.50
	\$310.00/hr	
4/16/2009 RAS: Work on preparation for EUO	3.00	\$930.00
	\$310.00/hr	
4/17/2009 RAS: Examination under oath with Dan Thenell	4.25	\$1,317.50
	\$310.00/hr	
5/12/2009 RAS: Review of letter to Safeco Policy and Thom's records	2.00	\$620.00
	\$310.00/hr	
5/21/2009 RAS: Review of letter from Thenell	0.75	\$232.50
Prepare request for documents	\$310.00/hr	
5/29/2009 RAS: Work on letter to Safeco	3.00	\$930.00
Letter to Ben Steel	\$310.00/hr	
Demand for payment, tax returns		
Call with Glen Cunningham and Thom		
6/2/2009 RAS: Letter to Glen Cunningham re: notes re financial issues	2.50	\$775.00
Letter to Thenell re: documents	\$310.00/hr	
RAS: Letter to Bob Steele re: financials	0.75	\$232.50
	\$310.00/hr	
6/3/2009 RAS: Cunningham letter re: review of records	0.50	\$155.00
	\$310.00/hr	
6/9/2009 RAS: Letter to Ben Steele re: enclose Cunningham tax records	0.50	\$155.00
	\$310.00/hr	
6/11/2009 RAS: Work on Safeco's claim letter to Attorney	1.50	\$465.00
Call with Glen Cunningham and Thom	\$310.00/hr	
6/15/2009 RAS: Review of letters to Safeco, Ben Steel, rent of \$500.00 issue	2.50	\$775.00
	\$310.00/hr	

	<u>Hrs/Rate</u>	<u>Amount</u>
6/16/2009 RAS: Letter from Dan Thenell re: records	0.75 \$310.00/hr	\$232.50
6/17/2009 RAS: Review of dictation, demolition bids Call with Thom	0.50 \$310.00/hr	\$155.00
6/18/2009 RAS: Assurance accounting letter to Steele Review of letter from Ben Steele	0.75 \$310.00/hr	\$232.50
6/23/2009 RAS: Review letter from North West Accounting to Cunningham	0.50 \$310.00/hr	\$155.00
6/24/2009 RAS: Dictation of Proof of Loss Calls with Thom E mail to Banks Attorney and Sandy Letter to Dan Thenell	3.00 \$310.00/hr	\$930.00
6/25/2009 RAS: Review of check from North West Call with Thom	0.50 \$310.00/hr	\$155.00
6/26/2009 RAS: Letter to Thenell re: bank statements Letter from Cunningham re: Business Income and taxes	0.75 \$310.00/hr	\$232.50
6/30/2009 RAS: Review and Dictation re: Safeco policy	1.00 \$310.00/hr	\$310.00
7/1/2009 RAS: Call with Thom re: complaint and witnesses Conference with Thom re: financial records Calls with Accountant Letter to Thenell	3.50 \$310.00/hr	\$1,085.00
7/8/2009 RAS: Dictation re: complaint Call with Sandy Legal research E mail to Jennifer Batten Review of file	1.75 \$310.00/hr	\$542.50
7/13/2009 RAS: Review Legal research Calls with Sandy	2.50 \$310.00/hr	\$775.00
7/14/2009 RAS: Review of Complaint	0.75 \$310.00/hr	\$232.50
7/15/2009 RAS: Letter to Ryan Anderson re: art work File complaint letter re: Service	2.00 \$310.00/hr	\$620.00
7/16/2009 RAS: <del>Preparation of Summons</del> <del>Arrange for service of Summons and complaint on CWI and Empire</del> Wilshire credit letter to Thom	<del>2.25</del> \$310.00/hr	<del>\$697.50</del>
7/24/2009 RAS: Check \$3,004.00, call to Thom Letter to Martin and Sawyer with complaint	1.25 \$310.00/hr	\$387.50
8/3/2009 RAS: Review of Thenell rep letter	0.50 \$310.00/hr	\$155.00
8/11/2009 RAS: Review notes Phone call with Thenell	1.50 \$310.00/hr	\$465.00
8/17/2009 RAS: Teleconference with John Bennett, Attorney for Empire	0.25 \$310.00/hr	\$77.50

	<u>Hrs/Rate</u>	<u>Amount</u>
8/18/2009 RAS: Landlord request for payment, Northern Leasing Systems	0.50 \$310.00/hr	\$155.00
8/25/2009 RAS: Teleconference with John Bennett, Empire	0.25 \$310.00/hr	\$77.50
8/26/2009 RAS: Review of Steve Bonfiglio's letter to Thenell re: foreclosure	0.50 \$310.00/hr	\$155.00
8/31/2009 RAS: Call and letter to Talent Irrigation District	0.75 \$310.00/hr	\$232.50
9/11/2009 RAS: <del>Empire documents received and reviewed</del>	<del>4.50</del> \$310.00/hr	<del>\$465.00</del>
10/9/2009 RAS: Call to Steve Bonfiglio re: foreclosure and settlement	0.75 \$310.00/hr	\$232.50
10/15/2009 RAS: Calls with Sandy and Thom	0.50 \$310.00/hr	\$155.00
10/20/2009 RAS: Review and Dictation	1.50 \$310.00/hr	\$465.00
10/22/2009 RAS: Letter to Bennett and Thenell with complaint	0.50 \$310.00/hr	\$155.00
10/24/2009 RAS: Letter to James Nelson, US Bank and Thom	0.25 \$310.00/hr	\$77.50
10/27/2009 RAS: Letter to Thenell and Bennett re: appraisal by Cunningham	0.75 \$310.00/hr	\$232.50
11/6/2009 RAS: Calls with Thenell re: Motion	0.50 \$310.00/hr	\$155.00
11/19/2009 RAS: Letter to James Nelson re: debts owed	0.25 \$310.00/hr	\$77.50
11/23/2009 RAS: Letter from Stuart Jones re: Production Review	1.25 \$310.00/hr	\$387.50
11/25/2009 RAS: Letter to Thom and Sandy re: production	0.25 \$310.00/hr	\$77.50
11/30/2009 RAS: Review of email to Thenell re: appraisal and inspection	0.75 \$310.00/hr	\$232.50
12/1/2009 RAS: Letter to Sandy re: Motion Review of file	0.50 \$310.00/hr	\$155.00
12/2/2009 RAS: 10 day letter to Bennett Review	0.50 \$310.00/hr	\$155.00
12/3/2009 RAS: Review of letter from Stuart Jones	0.25 \$310.00/hr	\$77.50
12/4/2009 RAS: Review of Motion to make more definite and certain to strike and dismiss	0.50 \$310.00/hr	\$155.00
12/7/2009 RAS: Calls re: survey for asbestos Review of mail from Thenell	1.50 \$310.00/hr	\$465.00
12/8/2009 RAS: Letter to Thenell re: agents and video Review	1.75 \$310.00/hr	\$542.50



	<u>Hrs/Rate</u>	<u>Amount</u>
12/9/2009 RAS: Letter to Sandy re: Update Rule 21 Motion	0.50	\$155.00
	\$310.00/hr	
12/10/2009 RAS: Review updated Motion to Make More Definite and Certain	1.25	\$387.50
Call with Sandy Sawyer	\$310.00/hr	
E mail to Sawyer		
12/16/2009 RAS: Review of fax from Glen, Bank and policy	0.75	\$232.50
	\$310.00/hr	
12/17/2009 RAS: Work on production request	3.50	\$1,085.00
	\$310.00/hr	
12/18/2009 RAS: Letter to John Bennett re: answer to request for admissions	0.75	\$232.50
	\$310.00/hr	
12/24/2009 RAS: Letter to John Bennett re: Notice from Wilshire	0.50	\$155.00
	\$310.00/hr	
12/28/2009 RAS: Letter to Thenell re: agents and video	1.75	\$542.50
Review	\$310.00/hr	
1/4/2010 RAS: Work on Production (Oregon Mutual - Thenell)	1.50	\$465.00
	\$310.00/hr	
1/5/2010 RAS: Letter to Henselman	0.25	\$77.50
	\$310.00/hr	
1/8/2010 RAS: Review of OMI request for production	1.50	\$465.00
	\$310.00/hr	
1/11/2010 RAS: Letter to Henselman re: landlord rent due	0.50	\$155.00
	\$310.00/hr	
1/13/2010 RAS: Fax from Henselman re: rent information	0.50	\$155.00
	\$310.00/hr	
1/26/2010 RAS: Fax from Henselman re: rent information	0.50	\$155.00
	\$310.00/hr	
1/27/2010 RAS: Letter to Sawyer re: production	<del>3.25</del>	<del>\$1,007.50</del>
Work on Complaint	\$310.00/hr	
Complete Notice to Produce		
1/28/2010 RAS: Review 1099	0.50	\$155.00
Status letter to Thenell	\$310.00/hr	
2/2/2010 RAS: Letter to from Steve Bonfiglio to OMI	0.50	\$155.00
Letter to Client re: production request	\$310.00/hr	
2/8/2010 RAS: E mail to Ryan Anderson with lease documents	0.50	\$155.00
	\$310.00/hr	
2/11/2010 RAS: Final letter to Steve Bonfiglio	0.50	\$155.00
	\$310.00/hr	
2/24/2010 RAS: Letter to Sandy, enclosed Empire's Answer	0.50	\$155.00
Review	\$310.00/hr	
3/3/2010 RAS: Letter to Thenell re: extension to discount requests	0.25	\$77.50
	\$310.00/hr	
3/24/2010 RAS: Conference with Thom	1.00	\$310.00
Call with Insurance Agents	\$310.00/hr	

	<u>Hrs/Rate</u>	<u>Amount</u>
4/1/2010 RAS: Review work on discovery Sandy re: three binders re: production from OMI	1.50 \$310.00/hr	\$465.00
4/2/2010 RAS: Review of discovery	1.00 \$310.00/hr	\$310.00
4/10/2010 RAS: Teleconference with Tom Hamlin re: Rolls Royce value Email to Sandy re: answer from Bank	0.75 \$310.00/hr	\$232.50
4/15/2010 RAS: Review draft of complaint Legal research	1.75 \$310.00/hr	\$542.50
4/22/2010 RAS: Review Conference with Alice Dictation of Response Letter to John Bennett	1.25 \$310.00/hr	\$387.50
4/26/2010 RAS: Review Call with Safeco adjuster	1.25 \$310.00/hr	\$387.50
4/27/2010 RAS: Meeting with Thom and Sandy Letter to Ryan Anderson Claim to Thenell Western States Subpoena	1.75 \$310.00/hr	\$542.50
4/28/2010 RAS: Work on response to production Legal research	2.00 \$310.00/hr	\$620.00
4/29/2010 RAS: Call with Mindy Carver, Attorney for Western States Letter to Mindy Carver Letter to Thenell with trial date	1.00 \$310.00/hr	\$310.00
4/30/2010 RAS: Letter and subpoena to Quest for telephone records Stuart Jones claim Letter to client re: trial date	1.75 \$310.00/hr	\$542.50
5/17/2010 RAS: Receipt and review of Western States documents and CD	1.50 \$310.00/hr	\$465.00
5/28/2010 RAS: Thenell notice for Bank of America	0.50 \$310.00/hr	\$155.00
6/24/2010 RAS: Call with Ryan Anderson Work on summary judgment E mail to Sandy Letter to Sandy with Affidavits Review of discovery Call with Linda Lindgren	2.00 \$310.00/hr	\$620.00
7/1/2010 RAS: Call re: rents on lease	0.50 \$310.00/hr	\$155.00
7/8/2010 RAS: Letter to Judge Harris	0.25 \$310.00/hr	\$77.50
7/14/2010 RAS: Letter to Stuart Jones re: oral argument	0.50 \$310.00/hr	\$155.00
7/19/2010 RAS: Letter to Rob May to confirm extension of time	0.50 \$310.00/hr	\$155.00

	<u>Hrs/Rate</u>	<u>Amount</u>
7/28/2010 RAS: Call with Thom Martin re: case in general and production request	3.50	\$1,085.00
	\$310.00/hr	
8/5/2010 RAS: Work on production responses	4.25	\$1,317.50
	\$310.00/hr	
8/6/2010 RAS: Letter to May To Court - Motion for Summary Judgment	0.50	\$155.00
	\$310.00/hr	
8/9/2010 RAS: Letter from May - Production response Letter to Sandy re: OMI's opposition to Summary Judgment	0.75	\$232.50
	\$310.00/hr	
8/10/2010 RAS: Call with Rob May Calls to Bank of America and Banks	2.00	\$620.00
	\$310.00/hr	
RAS: Work on trial preparation Calls with Bank of America Travel to Fire Department for file	2.50	\$775.00
	\$310.00/hr	
8/11/2010 RAS: Letter to Karaman re: mediation	0.50	\$155.00
	\$310.00/hr	
8/12/2010 RAS: Legal research and review Calls with Adverse Attorney	4.00	\$1,240.00
	\$310.00/hr	
8/13/2010 RAS: Legal research re: Cancellation	4.50	\$1,395.00
	\$310.00/hr	
RAS: Letter to Fire Department with Subpoena	0.50	\$155.00
	\$310.00/hr	
8/17/2010 RAS: Letter from Cunningham re: Department of /revenue denial to Thom Call with Rob May and Thom	1.00	\$310.00
	\$310.00/hr	
8/19/2010 RAS: <del>Review of Lease from Empire</del> <del>Memo to Cunningham</del> Calls	<del>4.50</del>	<del>\$465.00</del>
	\$310.00/hr	
8/25/2010 RAS: Review of Empire dismissal	0.50	\$155.00
	\$310.00/hr	
8/30/2010 RAS: Cunningham letter to IRS	0.25	\$77.50
	\$310.00/hr	
9/8/2010 RAS: Teleconference with Rob May Dictation Call with Thom	1.50	\$465.00
	\$310.00/hr	
RAS: Teleconference with Rob May Dictation Call with Thom	1.50	\$465.00
	\$310.00/hr	
9/17/2010 RAS: Stuart Jones letter	0.25	\$77.50
	\$310.00/hr	
9/28/2010 RAS: Letter to Judge Harris to postpone trial	0.50	\$155.00
	\$310.00/hr	
10/5/2010 RAS: Meeting with Thom, Alice, Sandy Call to Rob May re: trial Review	1.50	\$465.00
	\$310.00/hr	

	<u>Hrs/Rate</u>	<u>Amount</u>
10/6/2010 RAS: To Court - Judge Harris Preparation of Order to Postpone Calls and emails with Attorneys	1.25 \$310.00/hr	\$387.50
11/9/2010 RAS: Conference with Thom Review of file information	4.50 \$310.00/hr	\$1,395.00
12/28/2010 RAS: Conference with Thom re: tax returns and information	1.50 \$310.00/hr	\$465.00
<del>1/20/2011 RAS: Conference with Thom Review of file</del>	<del>3.50 \$310.00/hr</del>	<del>\$1,085.00</del>
RAS: Conference with Thom Review of file	3.50 \$310.00/hr	\$1,085.00
2/8/2011 RAS: Bank of America Notice Review with Thom	0.50 \$310.00/hr	\$155.00
3/2/2011 RAS: Letter to Lopez re: amended complaint	0.25 \$310.00/hr	\$77.50
3/8/2011 RAS: Review of letters from Lopez, Third Amendment	0.50 \$310.00/hr	\$155.00
3/11/2011 RAS: Review and Dictation re: Thom's debt issues Stipulation to file Third Amended Complaint to Judge Harris	1.00 \$310.00/hr	\$310.00
3/16/2011 RAS: Legal research re: ORS 86 Memo	1.25 \$310.00/hr	\$387.50
3/22/2011 RAS: Legal research re: Lopez Conference with Thom Review	1.75 \$310.00/hr	\$542.50
3/25/2011 RAS: Review Emails re: Title Call with Thom	0.50 \$310.00/hr	\$155.00
3/30/2011 RAS: Letter to Court with Affidavit of Service	0.50 \$310.00/hr	\$155.00
4/7/2011 RAS: Meeting with Eric and Larry Review files and Pleadings	4.50 \$310.00/hr	\$1,395.00
4/25/2011 RAS: Review re: discovery, etc.	3.50 \$310.00/hr	\$1,085.00
5/2/2011 RAS: Letter to Thom	0.50 \$310.00/hr	\$155.00
5/6/2011 RAS: Review of letter: Rob May to Oliver	0.50 \$310.00/hr	\$155.00
5/10/2011 RAS: <del>Review and legal research of answer by Bank</del>	<del>1.00 \$310.00/hr</del>	<del>\$310.00</del>
5/11/2011 RAS: Call with Attorney for Insurance Company Calls to Bank's Attorney with Thom	0.50 \$310.00/hr	\$155.00
5/12/2011 RAS: Memo re: Lopez wants settlement conference confirmed	0.50 \$310.00/hr	\$155.00
5/20/2011 RAS: Email from Lopez	0.50 \$310.00/hr	\$155.00

	<u>Hrs/Rate</u>	<u>Amount</u>
5/23/2011 RAS: Letter to Thom re: Bank of America notice	0.50 \$310.00/hr	\$155.00
5/25/2011 RAS: Letter to Thom re: debts	0.50 \$310.00/hr	\$155.00
5/26/2011 RAS: Letters, emails and calls re: settlement conference	0.75 \$310.00/hr	\$232.50
6/3/2011 RAS: Emails and calls re: settlement conference	0.50 \$310.00/hr	\$155.00
6/7/2011 RAS: Review, emails re: settlement conference Call with Thom and Sandy	1.00 \$310.00/hr	\$310.00
6/22/2011 RAS: Send summary and Complaint re: bank	0.25 \$310.00/hr	\$77.50
6/30/2011 RAS: Work on Production request	2.00 \$310.00/hr	\$620.00
7/4/2011 RAS: Work on response to production OMI	3.50 \$310.00/hr	\$1,085.00
7/5/2011 RAS: Affidavit of Service	0.50 \$310.00/hr	\$155.00
7/6/2011 RAS: Letter to Lopez re: subpoena Response to Production to Lopez	0.75 \$310.00/hr	\$232.50
7/7/2011 RAS: Review of Subpoena's American States and Insurance Companies from Lopez	0.75 \$310.00/hr	\$232.50
7/8/2011 RAS: Lopez letter to Oliver re: settlement conference and Subpoenas	0.50 \$310.00/hr	\$155.00
7/14/2011 RAS: <del>Work on settlement conference statements</del> Review	<del>2.50</del> \$310.00/hr	<del>\$775.00</del>
7/18/2011 RAS: <del>Draft settlement conference statements</del> Review of Citi Banks's representative letter Call and email to Sandy	<del>3.50</del> \$310.00/hr	<del>\$1,085.00</del>
7/19/2011 RAS: Letter to Sandy re: Thom's interviews	1.75 \$310.00/hr	\$542.50
7/20/2011 RAS: <del>Finalize settlement conference statement</del>	<del>2.50</del> \$310.00/hr	<del>\$775.00</del>
7/22/2011 RAS: Letter to Sandy and Thom re: settlement conference	0.25 \$310.00/hr	\$77.50
7/25/2011 RAS: Letter to Lopez with photos Letter to Court Review of file for settlement conference	2.50 \$310.00/hr	\$775.00
7/27/2011 RAS: Meeting with Thom Review of files Letter to Lopez	1.50 \$310.00/hr	\$465.00
7/28/2011 RAS: Settlement conference	5.50 \$310.00/hr	\$1,705.00

	<u>Hrs/Rate</u>	<u>Amount</u>
8/16/2011 RAS: E mail re: banks position	0.50	\$155.00
Call with Thom and Sandy	\$310.00/hr	
8/17/2011 RAS: Email re: second conference	0.50	\$155.00
Call with Thom	\$310.00/hr	
8/18/2011 RAS: E mail re: second conference	0.25	\$77.50
	\$310.00/hr	
9/6/2011 RAS: Settlement conference at Courthouse	4.00	\$1,240.00
	\$310.00/hr	
9/22/2011 RAS: Review email re: banks position	0.25	\$77.50
	\$310.00/hr	
9/28/2011 RAS: Meeting with Thom	2.50	\$775.00
Review	\$310.00/hr	
RAS: Letter to Safeco re: appraisal letter	0.50	\$155.00
	\$310.00/hr	
11/3/2011 RAS: Review of documents	0.50	\$155.00
Motion for Sanctions	\$310.00/hr	
11/4/2011 RAS: Review of OMI Motion to Compel	0.25	\$77.50
	\$310.00/hr	
11/7/2011 RAS: Motion for Sanctions at Court house	1.50	\$465.00
	\$310.00/hr	
11/17/2011 RAS: Rob May letter to Court with Answers	1.50	\$465.00
Sawyers email of Answers and review	\$310.00/hr	
11/22/2011 RAS: Emails and review Sawyer re: Summary Judgment	3.50	\$1,085.00
	\$310.00/hr	
12/2/2011 RAS: Preparation for Motion	0.75	\$232.50
Letter to Thom and Sandy re: OMI reply brief	\$310.00/hr	
12/5/2011 RAS: To Court for hearing; Motion to Compel	1.50	\$465.00
	\$310.00/hr	
12/6/2011 RAS: Calls and emails re: depositions and Order to Compel	1.50	\$465.00
Banks answer to Thom	\$310.00/hr	
Review		
12/14/2011 RAS: Send Notice of Representation to Thom	0.25	\$77.50
	\$310.00/hr	
12/15/2011 RAS: Review of Lopez's Subpoena letter	0.50	\$155.00
	\$310.00/hr	
12/19/2011 RAS: Calls to Court and Attorneys re: Pretrial	1.75	\$542.50
Dictation of Order	\$310.00/hr	
Letter to Court		
12/22/2011 RAS: Letter to Judge Harris re: postponement	1.00	\$310.00
	\$310.00/hr	
12/28/2011 RAS: Substitution of Counsel - Bank	0.25	\$77.50
	\$310.00/hr	
1/6/2012 RAS: Letter to Thom	0.50	\$155.00
Preparation for Trial conference	\$310.00/hr	

	<u>Hrs/Rate</u>	<u>Amount</u>
1/9/2012 RAS: To Court - Motion to postpone	1.50 \$310.00/hr	\$465.00
2/3/2012 RAS: Review Letter	0.75 \$310.00/hr	\$232.50
2/6/2012 RAS: Review of TID letter Dictation of Agreement	0.50 \$310.00/hr	\$155.00
4/19/2012 RAS: Review of Lopez letter re: records	0.50 \$310.00/hr	\$155.00
4/20/2012 RAS: Review of Lopez letter to Court proposed Order	0.25 \$310.00/hr	\$77.50
4/23/2012 RAS: Email to Thom re: appraisal	0.50 \$310.00/hr	\$155.00
4/30/2012 RAS: Costs to Thom E mails and calls re: trial and deposition to Client	1.25 \$310.00/hr	\$387.50
5/1/2012 RAS: Review of Subpoena - Wilshire	0.25 \$310.00/hr	\$77.50
5/2/2012 RAS: Letter to Lopez re: Subpoena's	0.25 \$310.00/hr	\$77.50
5/7/2012 RAS: Review of May letter To Court for Pretrial Letter to Thom	1.50 \$310.00/hr	\$465.00
5/10/2012 RAS: Review and Dictation Stephen Lopez copy of Subpoena	0.50 \$310.00/hr	\$155.00
5/11/2012 RAS: Letter to Lopez - checks from Bank Review of E mails Trial preparation	1.50 \$310.00/hr	\$465.00
5/14/2012 RAS: Preparation for Court appearance Review of May letter re: trial and production	0.50 \$310.00/hr	\$155.00
RAS: Review and Dictation	0.50 \$310.00/hr	\$155.00
5/17/2012 RAS: From Lopez re: Alice McGee depositions	0.50 \$310.00/hr	\$155.00
5/19/2012 RAS: Conference with Thom Letter from Court	1.50 \$310.00/hr	\$465.00
5/21/2012 RAS: Meeting with Alice and letter E mail to Lopez re: depositions	0.50 \$310.00/hr	\$155.00
5/22/2012 RAS: Letter - depositions of McGee	0.25 \$310.00/hr	\$77.50
5/29/2012 RAS: Letter to Judge Harris re: hearing date	0.25 \$310.00/hr	\$77.50
6/1/2012 RAS: Notice from Court re: Summary Judgment	0.25 \$310.00/hr	\$77.50
6/7/2012 RAS: Preparation for depositions Depositions Conference with Thom	5.50 \$310.00/hr	\$1,705.00

	<u>Hrs/Rate</u>	<u>Amount</u>
6/8/2012 RAS: Review of Summary Judgment records	3.50 \$310.00/hr	\$1,085.00
6/12/2012 RAS: Memo re: OMI settlement	1.50 \$310.00/hr	\$465.00
6/18/2012 RAS: Depositions Call with Linda Lindgren Lopez request for production Eric Harworth carousel horse	1.50 \$310.00/hr	\$465.00
6/19/2012 RAS: Depositions Jennifer Batton, Verizon	5.50 \$310.00/hr	\$1,705.00
RAS: Letter to Quest and Verizon with Subpoena	2.50 \$310.00/hr	\$775.00
6/21/2012 RAS: Letter to Lindgren	0.50 \$310.00/hr	\$155.00
6/25/2012 RAS: Letter to Martin re: deposition documents	0.50 \$310.00/hr	\$155.00
6/27/2012 RAS: Work on production requests	1.75 \$310.00/hr	\$542.50
6/28/2012 RAS: Work on Production requests	2.50 \$310.00/hr	\$775.00
<del>6/29/2012 RAS: Letter to Rob May re: Insurance billing and account history, Subpoena</del>	<del>3.00 \$310.00/hr</del>	<del>\$930.00</del>
7/2/2012 RAS: Work on Summary Judgment Letter to May and Oliver: sent production documents	3.00 \$310.00/hr	\$930.00
7/3/2012 RAS: Work on Brief	3.00 \$310.00/hr	\$930.00
7/9/2012 RAS: Summary Judgment Hearing with Judge Harris Phone notes with ERS	2.00 \$310.00/hr	\$620.00
7/12/2012 RAS: Memo - Appraisal Deane McLean Memo - Rob May	0.50 \$310.00/hr	\$155.00
7/19/2012 RAS: Emails with Matt Sutton, Southern Oregon Credit Bureau	0.25 \$310.00/hr	\$77.50
7/26/2012 RAS: Letter to Lopez to obtain production	0.50 \$310.00/hr	\$155.00
8/8/2012 RAS: Review of Order Dictation Legal research Conference with Larry, Eric and Sandra	3.75 \$310.00/hr	\$1,162.50
8/10/2012 RAS: Review and legal research	2.50 \$310.00/hr	\$775.00
8/13/2012 RAS: Phone notes: Rob May teleconference	1.00 \$310.00/hr	\$310.00
RAS: Calls with Schroeder re: appraisals	0.50 \$310.00/hr	\$155.00



	<u>Hrs/Rate</u>	<u>Amount</u>
8/17/2012 RAS: Review of letter from Lopez Subpoenas Cunningham letter	1.00 \$310.00/hr	\$310.00
8/27/2012 RAS: Letter to Lopez	0.25 \$310.00/hr	\$77.50
9/4/2012 RAS: Review and email re: trial	0.50 \$310.00/hr	\$155.00
9/5/2012 RAS: Letter to Thom Letter to Cunningham acknowledging subpoena	0.50 \$310.00/hr	\$155.00
9/10/2012 RAS: Letter to Thom re: Nagel subpoena	0.50 \$310.00/hr	\$155.00
9/20/2012 RAS: Letter to Cunningham re: release	0.50 \$310.00/hr	\$155.00
10/9/2012 RAS: Letter from Lopez re: tax returns Memo to file re: Sawyer	1.50 \$310.00/hr	\$465.00
10/11/2012 RAS: E mail to Thom with Lopez letter	0.25 \$310.00/hr	\$77.50
RAS: Review with Bob B at dinner	1.00 \$310.00/hr	\$310.00
10/12/2012 RAS: E mails re: tax returns and summary judgment	0.50 \$310.00/hr	\$155.00
10/22/2012 RAS: Review Lopez to Court with reply brief	0.50 \$310.00/hr	\$155.00
<del>10/23/2012 RAS: Letter to Sawyer reply to OMI reply brief and review</del>	<del>1.25 \$310.00/hr</del>	<del>\$387.50</del>
RAS: Letter to Sawyer reply to OMI reply brief and review	1.25 \$310.00/hr	\$387.50
10/25/2012 RAS: Draft response; send to Sandy	1.75 \$310.00/hr	\$542.50
10/26/2012 RAS: Work on Summary Judgment and review Call to OMI Attorneys	1.50 \$310.00/hr	\$465.00
11/1/2012 RAS: Letter to Lopez - change hearing date	0.25 \$310.00/hr	\$77.50
11/2/2012 RAS: Work on final drafts	5.25 \$310.00/hr	\$1,627.50
11/5/2012 RAS: Review of Insurance Contract re: loss payable provisions Memo to RAS	0.50 \$310.00/hr	\$155.00
11/9/2012 RAS: Review of Lopez letter to Court - amended answer	1.00 \$310.00/hr	\$310.00
11/12/2012 RAS: Send OMI answer to Thom and Sandy Review	1.50 \$310.00/hr	\$465.00
11/13/2012 RAS: Email to Sawyer - OMI amended answer	0.50 \$310.00/hr	\$155.00

	<u>Hrs/Rate</u>	<u>Amount</u>
11/21/2012 RAS: Review of letter from Oliver re: Notice from Bank	0.25 \$310.00/hr	\$77.50
11/26/2012 RAS: Review of letter from Oliver re: National settlement	0.75 \$310.00/hr	\$232.50
11/27/2012 RAS: Email to Sandy re: bank documents	0.25 \$310.00/hr	\$77.50
11/29/2012 RAS: Review of files Emails to Dana and Sandy	1.00 \$310.00/hr	\$310.00
11/30/2012 RAS: Review of documents Memo re: appraisal Calls with appraiser	1.25 \$310.00/hr	\$387.50
12/3/2012 RAS: Conference with Thom and Dana re: trial and personal property	1.50 \$310.00/hr	\$465.00
12/13/2012 RAS: Emails re: scheduling	0.75 \$310.00/hr	\$232.50
12/17/2012 RAS: Call with Lopez	0.25 \$310.00/hr	\$77.50
12/18/2012 RAS: Review of Motion for Summary Judgment	1.50 \$310.00/hr	\$465.00
1/3/2013 RAS: Preparation of Motion and Response	2.50 \$310.00/hr	\$775.00
1/4/2013 RAS: File Motion to Make More Definite and Certain E mail to Client	1.50 \$310.00/hr	\$465.00
1/7/2013 RAS: <del>Summary Judgment Hearing</del>	<del>2.50</del> <del>\$310.00/hr</del>	<del>\$775.00</del>
1/11/2013 RAS: Review Sawyers email re: amended answer	0.50 \$310.00/hr	\$155.00
1/30/2013 RAS: Letter to Court re: Motion issues	0.50 \$310.00/hr	\$155.00
2/25/2013 RAS: Email pictures to Jeff, Hiatt Contractor Meeting	3.75 \$310.00/hr	\$1,162.50
2/26/2013 RAS: Memo re: Hiatt meeting	0.50 \$310.00/hr	\$155.00
3/10/2013 RAS: Letter to Oliver with Schuler proposal for appraisal	0.50 \$310.00/hr	\$155.00
3/11/2013 RAS: Oral Argument Review	1.25 \$310.00/hr	\$387.50
RAS: Rule 21 Motion Letter to Rob May re: photos	1.75 \$310.00/hr	\$542.50
3/14/2013 RAS: E mail to Lopez - proposed order Rule 21	0.50 \$310.00/hr	\$155.00
3/25/2013 RAS: Review of Lopez letter to Court re: Rule 21 Order	0.50 \$310.00/hr	\$155.00

	<u>Hrs/Rate</u>	<u>Amount</u>
3/29/2013 RAS: Calls with Thom and Sandy	0.50 \$310.00/hr	\$155.00
4/1/2013 RAS: Pretrial conference	1.50 \$310.00/hr	\$465.00
4/4/2013 RAS: Calls with Greg Schuler re: appraisal	1.75 \$310.00/hr	\$542.50
4/8/2013 RAS: Conference with ERS and LCH	1.50	\$465.00
Dictation to bank	\$310.00/hr	
RAS: Email to Oliver re: bank statements	0.50	\$155.00
	\$310.00/hr	
4/12/2013 RAS: Review of Schuler appraisal letter	0.50	\$155.00
	\$310.00/hr	
4/15/2013 RAS: Letter to Sawyer re: appraisal	0.25	\$77.50
	\$310.00/hr	
4/16/2013 RAS: Letter to Thom re: appraisal	0.25	\$77.50
	\$310.00/hr	
4/17/2013 RAS: Outline of Policy	1.75	\$542.50
	\$310.00/hr	
4/19/2013 RAS: Review of Oliver's Bank of America information	0.50	\$155.00
	\$310.00/hr	
4/25/2013 RAS: Review of files for meeting	0.75	\$232.50
	\$310.00/hr	
4/26/2013 RAS: Meeting with Thom, Sandy, LCH, ERS and RAS	2.50	\$775.00
	\$310.00/hr	
RAS: Letter to Bank	1.50	\$465.00
Review	\$310.00/hr	
4/28/2013 RAS: Letter from Oliver - more information	0.50	\$155.00
	\$310.00/hr	
4/29/2013 RAS: Judge Grensky to sign Orders	0.50	\$155.00
Letter to Linda Oliver	\$310.00/hr	
5/9/2013 RAS: Work on Appraisal	0.50	\$155.00
	\$310.00/hr	
5/29/2013 RAS: Emails re: Appraisal	0.50	\$155.00
	\$310.00/hr	
7/8/2013 RAS: Calls and Emails re: Panine	1.25	\$387.50
	\$310.00/hr	
7/9/2013 RAS: Calls with Mike Panine	1.00	\$310.00
E mails re: Pictures	\$310.00/hr	
8/12/2013 RAS: Meeting with Thom and Dana re: review all pictures	3.25	\$1,007.50
	\$310.00/hr	
RAS: Pre-Trial conference	1.50	\$465.00
	\$310.00/hr	
8/14/2013 RAS: To Schroders	2.00	\$620.00
	\$310.00/hr	

	<u>Hrs/Rate</u>	<u>Amount</u>
8/22/2013 RAS: Conference with Thom and Dana	1.00 \$310.00/hr	\$310.00
8/26/2013 RAS: Review Call with Schroeders	0.25 \$310.00/hr	\$77.50
8/27/2013 RAS: To conference with George Schroeder	0.75 \$310.00/hr	\$232.50
8/29/2013 RAS: Arrange for Mediation	1.75 \$310.00/hr	\$542.50
<del>9/26/2013 RAS: Call with Linda Oliver</del>	<del>3.00 \$310.00/hr</del>	<del>\$930.00</del>
10/1/2013 RAS: Letter from Karaman re: Mediation report	0.75 \$310.00/hr	\$232.50
10/11/2013 RAS: Revision to Karaman mediation letter E mail to Sawyer	0.75 \$310.00/hr	\$232.50
10/14/2013 RAS: Conference with Thom, Dana, Sandy, Eric and RAS	3.50 \$310.00/hr	\$1,085.00
RAS: Conference with RAS and Sawyer re mediation	0.50 \$310.00/hr	\$155.00
10/15/2013 RAS: Work on letter to Judge Karaman	3.50 \$310.00/hr	\$1,085.00
RAS: Revision to Karaman letter	0.50 \$310.00/hr	\$155.00
10/16/2013 RAS: Review of Lingren disposition	0.75 \$310.00/hr	\$232.50
10/17/2013 RAS: Mediation	7.00 \$310.00/hr	\$2,170.00
11/27/2013 RAS: Review and Email to Sandy	0.50 \$310.00/hr	\$155.00
12/17/2013 RAS: Conference call with Thom re: discuss Associate Attorney	1.50 \$310.00/hr	\$465.00
1/7/2014 RAS: Call with Bob Bonaparte Call with Thom and Dana	1.50 \$310.00/hr	\$465.00
1/9/2014 RAS: Email and Calls with Bob	1.25 \$310.00/hr	\$387.50
RAS: Arrange emails for Bob	<del>5.50 \$310.00/hr</del>	<del>\$1,705.00</del>
RAS: <del>Emails and calls re: Agreements</del>	<del>2.00 \$310.00/hr</del>	<del>\$620.00</del>
1/10/2014 RAS: <del>Emails and meeting at Larks</del>	<del>2.50 \$310.00/hr</del>	<del>\$775.00</del>
RAS: Arrange file and emails Calls re: agreements	<del>5.50 \$310.00/hr</del>	<del>\$1,705.00</del>

	<u>Hrs/Rate</u>	<u>Amount</u>
1/12/2014 RAS: Review of property and documents with Bob B Meeting with Bob at site	<del>6.00</del> \$310.00/hr	<del>\$1,860.00</del>
1/13/2014 RAS: Emails and calls with Bob re: OMI Arrange documents	0.75 \$310.00/hr	\$232.50
1/15/2014 RAS: Email Notice of Association Review of Bob's case history Call with Thom and Dana Emails	4.25 \$310.00/hr	\$1,317.50
1/23/2014 RAS: <del>Review of history list with Bob's office</del>	<del>4.50</del> \$310.00/hr	<del>\$465.00</del>
1/24/2014 RAS: Review answer to National	0.50 \$310.00/hr	\$155.00
1/28/2014 RAS: Emails to Bob re: National E mail to Sandy	0.50 \$310.00/hr	\$155.00
1/29/2014 RAS: E mail re: David Fetcher Review summaries of depositions, etc	3.00 \$310.00/hr	\$930.00
1/31/2014 RAS: E mails and calls with Bob re: fee agreement, OMI and Bank	0.75 \$310.00/hr	\$232.50
2/5/2014 RAS: Email Oliver re: Statute of Limitation	0.25 \$310.00/hr	\$77.50
RAS: Email Oliver re: Statute of Limitation	0.25 \$310.00/hr	\$77.50
2/7/2014 RAS: Call with Thom re: mediation, personal property E mail to Sawyer	1.00 \$310.00/hr	\$310.00
2/10/2014 RAS: Review of Complaint re: intervention	0.50 \$310.00/hr	\$155.00
2/18/2014 RAS: Notice and email re: Motion to Intervene	0.25 \$310.00/hr	\$77.50
2/20/2014 RAS: Teleconference with Bob	0.50 \$310.00/hr	\$155.00
2/21/2014 RAS: Emails re: Court filings and Motion to Intervene Review of Opposition to Motion	1.00 \$310.00/hr	\$310.00
2/24/2014 RAS: Review Answer to Nationstar	0.50 \$310.00/hr	\$155.00
3/4/2014 RAS: Call and email Dahlin re: previous mediation Review of file	2.50 \$310.00/hr	\$775.00
3/6/2014 RAS: Review of letter re: mediation and calls from Bob	0.50 \$310.00/hr	\$155.00
3/7/2014 RAS: Emails re: mediation Review of Nation Star article	0.50 \$310.00/hr	\$155.00
3/17/2014 RAS: Hearing re: pretrial	1.50 \$310.00/hr	\$465.00

	<u>Hrs/Rate</u>	<u>Amount</u>
3/18/2014 RAS: Email to Joe Field	0.25 \$310.00/hr	\$77.50
3/24/2014 RAS: Review of Motion and scheduling of Mediation Call with Thom	1.25 \$310.00/hr	\$387.50
3/27/2014 RAS: Review of Mediation and bankruptcy schedules Call with Thom	1.25 \$310.00/hr	\$387.50
3/28/2014 RAS: Review of personal property inventory E mail to Appraiser Review of file - email to Bob B.	2.00 \$310.00/hr	\$620.00
4/3/2014 RAS: Teleconference re: business income	0.75 \$310.00/hr	\$232.50
4/7/2014 RAS: Email to Joe Field re: business income	0.50 \$310.00/hr	\$155.00
4/9/2014 RAS: Review of Mediation Emails from Bob	0.50 \$310.00/hr	\$155.00
4/21/2014 RAS: Emails and calls re: Mediation submission	1.00 \$310.00/hr	\$310.00
4/23/2014 RAS: Review of Nationstar answer	0.50 \$310.00/hr	\$155.00
4/24/2014 RAS: Review of file re: Summary Judgment Emails to Bob Calls with Bob	3.50 \$310.00/hr	\$1,085.00
4/25/2014 RAS: Review of Mediation documents and Mediation Agreement Pleading	1.00 \$310.00/hr	\$310.00
4/28/2014 RAS: Email to Joe Field re: Mediation Review email to Oliver	0.50 \$310.00/hr	\$155.00
4/30/2014 RAS: Review of Mediation submission draft Calls with Thom	0.75 \$310.00/hr	\$232.50
5/2/2014 RAS: Email of Inventory to Thom	0.25 \$310.00/hr	\$77.50
5/5/2014 RAS: Call and Email to Joe Field Review of file	1.50 \$310.00/hr	\$465.00
5/8/2014 RAS: Review of Joe Field letter	0.50 \$310.00/hr	\$155.00
5/12/2014 RAS: Review of Panine estimate	0.50 \$310.00/hr	\$155.00
<del>5/14/2014 RAS: Estimate through Mediation</del>	<del>15.00</del> \$310.00/hr	<del>\$4,650.00</del>
5/19/2014 RAS: E mail to Sandy re: mediation submission Review of documents	1.00 \$310.00/hr	\$310.00
5/23/2014 RAS: Calls with Bob E mail to Court re: Trial date	0.50 \$310.00/hr	\$155.00

	<u>Hrs/Rate</u>	<u>Amount</u>
9/25/2012 LCH: Conference re: Thom's motion for Summary Judgment	0.75	\$225.00
	\$300.00/hr	
10/9/2012 LCH: Legal research re: possible summary judgment	1.75	\$525.00
	\$300.00/hr	
10/18/2012 LCH: Review of banks response to Insurance Company Summary Judgment	0.50	\$150.00
	\$300.00/hr	
10/23/2012 LCH: Review of Insurance Company reply Banks brief	0.25	\$75.00
	\$300.00/hr	
10/25/2012 LCH: Review of Plaintiff's brief in bank summary judgment	0.75	\$225.00
	\$300.00/hr	
11/1/2012 LCH: Review of Summary Judgment draft	1.50	\$450.00
	\$300.00/hr	
11/2/2012 LCH: Conference with Client, RAS, ERS to correct and finalize Motion, Summary Judgment		
	1.00	\$300.00
11/2/2012 LCH: Conference with RAS		
	\$300.00/hr	
11/2/2012 LCH: Review Insurance Policy re: replacement of actual costs		
	\$300.00/hr	
1/8/2013 LCH: Review of Summary Judgment costs		
	0.25	\$75.00
1/8/2013 LCH: Review of Bank's letter and Motion to Dismiss		
	\$300.00/hr	
1/9/2013 LCH: Conference with RAS re: banks dismissal	0.50	\$150.00
	\$300.00/hr	
1/9/2013 LCH: Letter to defendants to make more definite and certain		
	\$300.00/hr	
1/29/2013 LCH: Review of banks objection to filing motion to make certain	0.25	\$75.00
	\$300.00/hr	
LCH: Prepare response to Defendant's opposition	0.75	\$225.00
	\$300.00/hr	
3/12/2013 LCH: Email to RAS idea's on Courts, summary judgment order	0.50	\$150.00
	\$300.00/hr	
3/13/2013 LCH: Conference with RAS		
	\$300.00/hr	
3/13/2013 LCH: Legal research re: correction of language in summary judgment order	1.00	\$300.00
	\$300.00/hr	
3/14/2013 LCH: Meeting with RAS re: bank claim	0.25	\$75.00
	\$300.00/hr	
3/14/2013 LCH: Conference with RAS and ERS re: summary judgment corrections	0.25	\$75.00
	\$300.00/hr	
4/1/2013 LCH: Review of emails	0.50	\$150.00
	\$300.00/hr	
4/8/2013 LCH: Meeting with ERS and RAS re: appraisals	1.00	\$300.00
	\$300.00/hr	
4/8/2013 LCH: Draft of Affirmative Defense re: ORS 73.0603 (3)	0.50	\$150.00
	\$300.00/hr	
4/9/2013 LCH: Emails and conference re: amending answer	0.50	\$150.00
	\$300.00/hr	
4/16/2013 LCH: Memo to RAS re: amendment to Answer per ORS 73.0603.(3)	0.50	\$150.00
	\$300.00/hr	
4/25/2013 LCH: Review of Motion for reconsideration	0.25	\$75.00
	\$300.00/hr	
4/26/2013 LCH: Conference with Clients and Attorneys	1.50	\$450.00
	\$300.00/hr	
6/19/2013 LCH: Review of Appraisal	0.50	\$150.00
	\$300.00/hr	

MR. THOM MARTIN

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	<u>Hours</u>	<u>Amount</u>
For professional services rendered	29.25	\$8,775.00
Balance due		<u>\$8,775.00</u>



	<u>Hrs/Rate</u>	<u>Amount</u>
5/29/2014 RAS: Call with Bob re: Trial	0.50	\$155.00
	\$310.00/hr	
RAS: Calls and emails re Trial and Strategy	0.50	\$155.00
	\$310.00/hr	
6/3/2014 RAS: Review of email	0.25	\$77.50
	\$310.00/hr	
12/1/2014 RAS: Review	1.50	\$465.00
Emails to Brooke	\$310.00/hr	
12/8/2014 RAS: Review with Bob Bonaparte	5.00	\$1,550.00
To Court	\$310.00/hr	
12/10/2014 RAS: Fire issue settlement	1.50	\$465.00
	\$310.00/hr	
12/17/2014 RAS: Call with Bob Bonaparte	0.50	\$155.00
Review of Notes	\$310.00/hr	
RAS: Emails Bob Bonaparte	0.75	\$232.50
Calls	\$310.00/hr	
12/30/2014 RAS: Call	3.50	\$1,085.00
Review of records with Hornecker's office	\$310.00/hr	
Call to Dave Hyatt		
For professional services rendered	673.75	\$208,862.50

STARK and HAMMACK, P. C.  
 ATTORNEYS AT LAW  
 100 EAST MAIN STREET, SUITE M  
 MEDFORD, OR 97501

Invoice submitted to:  
 MR. THOM MARTIN  
 59 S. STAGE ROAD  
 MEDFORD, OR 97501

January 26, 2015

RE; MS 2974  
 DATE OF FIRE: 7/17/2008  
 Invoice # 43745

Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
1/30/2012 LCH:		0.50	\$150.00
	Work on Plaintiff's response to Defendant's objection Rule 21 Motion	\$300.00/hr	
6/8/2012 LCH:	<del>Conference with RAS</del>	<del>1.50</del>	<del>\$450.00</del>
	Review of Summary Judgment	\$300.00/hr	
	Start on Insurance Company response to our Summary Judgment		
6/11/2012 LCH:	Review of summary Judgment briefs and opposition	3.50	\$1,050.00
	Memo to RAS	\$300.00/hr	
6/13/2012 LCH:	Memo to RAS re: Statutory cases	1.00	\$300.00
		\$300.00/hr	
7/9/2012 LCH:	Review of depositions and Supplementary brief	1.75	\$525.00
	Review of Plaintiff's brief - review to Evans case	\$300.00/hr	
	Conference with RAS		
8/13/2012 LCH:	Conference with RAS and ERS re: bank claim	1.50	\$450.00
		\$300.00/hr	
8/16/2012 LCH:	Review of Insurance Policy	1.50	\$450.00
		\$300.00/hr	
8/20/2012 LCH:	Conference with RAS and ERS re: bank claims	1.75	\$525.00
		\$300.00/hr	
9/13/2012 LCH:	Email re: summary judgment.	0.50	\$150.00
		\$300.00/hr	
9/20/2012 LCH:		0.50	\$150.00
	Review of Insurance Company Motion for Summary Judgment	\$300.00/hr	
	Conference with RAS and Sandy		
9/21/2012 LCH:	Review of Amended Answers and Notes	0.50	\$150.00
		\$300.00/hr	

STARK and HAMMACK, P. C.  
ATTORNEYS AT LAW  
100 EAST MAIN STREET, SUITE M  
MEDFORD, OR 97501

Invoice submitted to:  
MR. THOM MARTIN  
59 S. STAGE ROAD  
MEDFORD,, OR 97501

January 26, 2015

RE; MS 2974  
DATE OF FIRE: 7/17/2008  
Invoice # 43745

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
8/13/2012 ERS: Conference with RAS	0.50 \$300.00/hr	\$150.00
9/13/2012 ERS: Review of Summary Judgment Conference with RAS	0.50 \$300.00/hr	\$150.00
11/1/2012 ERS: Review of Summary Judgment	0.50 \$300.00/hr	\$150.00
4/8/2013 ERS: Conference with LCH and RAS	0.50 \$300.00/hr	\$150.00
4/26/2013 ERS: Strategy meeting	1.00 \$300.00/hr	\$300.00
	<hr/>	<hr/>
For professional services rendered	3.00	\$900.00
		<hr/>
Balance due		\$900.00
		<hr/> <hr/>

Sandra Sawyer  
Attorney fees on Martin v. OMI

DATE	Service	Rate	Time	Amount
2/8/2008	Contact PLE and review rules for reared counsel	<del>\$335.00</del>	0.5	<del>\$167.50</del>
<del>4/12/2008</del>	<del>Research insurance coverage and cancellation</del>	<del>\$335.00</del>	3.2	<del>\$1,072.00</del>
11/18/2008	Conf Richard Stark and Thom Martin review docs and statute on cancellation	\$335.00	5.75	\$1,926.25
12/19/2008	Conf RAS, Thom, Alice - review and research	\$335.00	4.5	\$1,507.50
1/8/2009	<del>Draft contract for relationship with RAS on Martin case - email RAS with research on cancellation</del>	<del>\$335.00</del>	4.25	<del>\$1,423.75</del>
1/8/2009	Call with RAS	\$335.00	0.25	\$83.75
1/11/2009	Draft Complaint. Email to RAS	\$335.00	3.25	\$1,088.75
<del>1/11/2009</del>	<del>Review docs and corres re Blackbird and Wilshire</del>	<del>\$335.00</del>		<del>\$335.00</del>
1/11/2009	Review docs and corres re Blackbird and Wilshire	\$335.00		\$335.00
1/13/2009	Review letter from RAS and enclosures Begin reseaz arch on waiver of pmt by bank	\$335.00	2.75	\$921.25
1/15/2009	Rev letter from RAS and Oregon State Report on Martin fire	\$335.00	0.5	\$167.50
1/25/2009	Letter to RAS with references	\$335.00	0.5	\$167.50
1/26/2009	<del>Email from RAS re Foreclosusre Sale Review other emails</del>	<del>\$335.00</del>	<del>0.5</del>	<del>\$167.50</del>
1/27/2009	Review letter from RAS re policies.Call study policies and call to RAS	\$335.00	0.75	\$251.25
2/9/2009	<del>Review letter from RAS re PLE.Call RAS in response</del>	<del>\$335.00</del>	<del>0.75</del>	<del>\$251.25</del>
3/17/2009	Respond to RAS re records and tax returns	\$335.00	0.5	\$167.50
3/19/2009	Email to RAS re suit and Thom's concerns	\$335.00	0.5	\$167.50

Sandra Sawyer  
Attorney fees on Martin v. OMI

4/14/2009	Review docs from both sides. Note <del>postponement of foreclosure sale</del>	<del>\$335.00</del>	<del>1.2</del>	\$402.00
10/15/2009	Call to RAS	\$335.00	0.25	\$83.75
11/26/2009	Review letter from RAS. Talk to Thom	\$335.00	0.5	\$167.50
12/2/2009	Letter from RAS re Motion. Research	\$335.00	1.5	\$502.50
12/9/2009	Letter from RAS. Work on Motions	\$335.00	1.25	\$418.75
1/27/2010	Review letter from RAS. Research estoppel and waiver	\$335.00	1.5	\$502.50
2/25/2010	Review Empire Answer. Study policy	\$335.00	3	\$1,005.00
4/20/2010	<del>Pick up discovery binders from RAS</del>	<del>\$335.00</del>		<del>\$335.00</del>
4/22/2010	Study discovery binders	\$335.00	3.5	\$1,172.50
5/9/2010	Work on Summary Judgments	\$335.00	4	\$1,340.00
6/24/2010	Review email from RAS	\$335.00	0.25	\$83.75
6/25/2010	Review letter and Attachments from RAS	\$335.00	0.5	\$167.50
10/5/2010	Meeting with RAS, Thom, Alice	\$335.00	1.5	\$502.50
4/25/2011	Email RAS and review 25 emails re case	\$335.00	1	\$335.00
5/4/2011	Email RAS re banks. Review file	\$335.00	1.2	\$402.00
5/22/2011	<del>Search internet for service agent for Citibank. E-mail results to RAS.</del>	<del>\$335.00</del>	<del>1.6</del>	<del>\$536.00</del>
6/6/2011	Review email from RAS re mediation. Study file and draft settlement statement	\$335.00	2.2	\$737.00
6/7/2011	Call with RAS and Thom	\$335.00	0.2	\$67.00
7/18/2011	Email settlement statement to RAS with opinion on settlement Call from RAS	\$335.00	0.5	\$167.50
7/20/2011	Review letter from RAS. Review email from RAS re Bank's position	\$335.00	0.5	\$167.50
7/23/2011	Review letter from RAS. Review email	\$335.00	0.5	\$167.50
7/28/2011	Settlement Conference	\$335.00	5.5	\$1,842.50
8/16/2011	Rev email re bank. Email RAS and Thom	\$335.00	0.75	\$251.25
8/17/2011	Review email re bank's rights	\$335.00	0.5	\$167.50
11/3/2011	Review email re photos before fire	\$335.00	0.5	\$167.50
11/17/2011	email to RAS of answers	\$335.00	0.5	\$167.50
11/20/2011	Work on Mot for Summary Judg. Email to RAS	\$335.00	2.2	\$737.00
11/22/2011	Review emails re Summary Judgment	\$335.00	0.75	\$251.25
12/2/2011	Review OMI reply brief	\$335.00	1.5	\$502.50
3/19/2012	Draft Mot for SJ against BAC and Citibank email to RAS	\$335.00	3.2	\$1,072.00
5/13/2012	Talk with Thom and Dana. Email RAS re their concerns and status of case	\$335.00	1.5	\$502.50
8/8/2012	Review file. Email to RAS re Banks failure to file a claim for insurance	\$335.00	1.75	\$586.25
8/10/2012	Email RAS re talk with BG re Estoppel	\$335.00	0.7	\$234.50
8/12/2012	Revise MSJ. Email RAS re filing MSJ	\$335.00	1.2	\$402.00

Sandra Sawyer  
Attorney fees on Martin v. OMI

9/20/2012	Email RAS re copy of note and trust deed	\$335.00	0.75	\$251.25
10/9/2012	Legal research re SJ	\$335.00	2.75	\$921.25
10/14/2012	Email to RAS re research and statute stopping interest on bank loan	\$335.00	0.5	\$167.50
10/15/2012	Email to RAS	\$335.00	0.5	\$167.50
10/18/2012	Email to RAS re banks being treated as separate insureds	\$335.00	0.5	\$167.50
10/23/2012	Email from RAS re OMI reply brief	\$335.00	1	\$335.00
10/24/2012	Draft Response to OMI SJ and email to RAS	\$335.00	2.5	\$837.50
10/25/2012	Correct Draft. Read email from RAS	\$335.00	0.75	\$251.25
10/29/2012	Review email from RAS. Work on SJ re banks and respond to RAS	\$335.00	1.25	\$418.75
10/31/2012	Redraft MSJ. Email to RAS	\$335.00	1.75	\$586.25
11/12/2012	Review Answer of OMI	\$335.00	1	\$335.00
11/13/2012	Review Amended Answer of OMI	\$335.00	0.5	\$167.50
11/14/2012	Review ins policy. Research OMI defenses. Respond to RAS email	\$335.00	4.2	\$1,407.00
11/14/2012	Review OMI Amended Answer. Er Email RAS	\$335.00	1.1	\$368.50
11/27/2012	Review RAS email and bank documents	\$335.00	1.2	\$402.00
11/29/2012	Respond to RAS email	\$335.00	0.5	\$167.50
12/5/2012	Email RAS statute on stopping interest	\$335.00	0.5	\$167.50
12/5/2012	Review bank docs on modification of loan and email RAS	\$335.00	0.75	\$251.25
12/16/2012	Prepare Response to Bank MSJ. Work on Mot in Limine. Email RAS	\$335.00	3.75	\$1,256.25
1/3/2013	Prepare Motion to Make Def anad Certain Email to RAS	\$335.00	2.8	\$938.00
3/11/2013	Review court's rulings on MSJs Email RAS	\$335.00	1.1	\$368.50
3/13/2013	Review another ruling on MSJ	\$335.00	0.5	\$167.50
3/29/2013	Tel Conf RAS and Thom	\$335.00	0.5	\$167.50
4/1/2013	Review email from bank. Email RAS	\$335.00	0.6	\$201.00
4/9/2013	Review email from LH. Email RAS	\$335.00	0.75	\$251.25
4/16/2013	Review appraisal	\$335.00	0.5	\$167.50
4/23/2013	Prepare Motion to Reconsider. Email RAS	\$335.00	1.2	\$402.00
4/26/2013	Conference with Thom, LCH, ERS, RAS	\$335.00	2.5	\$837.50
7/18/2013	Review file. Email to RAS re status	\$335.00	1.1	\$368.50
8/12/2013	Email RAS re prep for trial	\$335.00	0.5	\$167.50
9/10/2013	Email RAS re mediation and status	\$335.00	0.5	\$167.50
10/15/2013	Review mediation offer and email RAS	\$335.00	0.75	\$251.25
10/23/2013	Research reformation. Email to RAS	\$335.00	2.1	\$703.50
10/24/2013	Review RAS email. Talk with Dana. Email RAS re documents on increase of ins	\$335.00	0.75	\$251.25
11/6/2013	Email RAS re amending complaint	\$335.00	0.5	\$167.50
12/16/2013	Email RAS re SAFECO coverage & meeting	\$335.00	0.5	\$167.50
1/4/2014	Email RAS re amending complaint	\$335.00	0.25	\$83.75
1/10/2014	Review email from Bonaparte. Email RAS	\$335.00	0.25	\$83.75
2/7/2014	Review email from RAS	\$335.00	0.25	\$83.75

Sandra Sawyer  
Attorney fees on Martin v. OMI

3/25/2014	Review emails re mediation in Portland	\$335.00	0.25	\$83.75
3/27/2014	Review 3 emails re mediation/bankruptcy	\$335.00	0.5	\$167.50
3/28/2014	Review email from Bonaparte.	\$335.00	0.5	\$167.50
4/21/2014	Review Nationstar intervenor docs	\$335.00	0.5	\$167.50
4/24 - 12/10/2014	Review emails among attorneys	\$335.00	1.2	\$402.00
<del>Estimate through settlement</del>		<del>\$335.00</del>	<del>0.15</del>	<del>\$1025.00</del>
	<b>TOTAL</b>		<b>139.25</b>	<b>\$46,648.75</b>

SANDRA (Johnson) SAWYER, L.L.B./J.D.

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**ETHNIC ORIGIN** Native American (Enrolled member of Northwest Cherokee Confederated Tribes)

**PRESENT EMPLOYMENT** Retired from Private Practice of Law (Business and General Litigation)

**COLLEGE:** Oklahoma City University, Oklahoma City, Oklahoma (B.A. Journalism 1963)  
Texas Technological College, Lubbock, Texas  
Draughon's Business College, Oklahoma City, Ok.

*Honors:* Zeta Tau Alpha Pledge Scholarship Award  
Dean's Honor Roll  
President's Honor Roll

**LAW SCHOOL:** L.L.B. (J.D.) Oklahoma City University 1967

*Honors and Activities* Class Standing: First (11.33 GPA on 12 pt system)  
50% Merit Scholar  
Outstanding First Year Law Student  
Law School Representative to University Student Senate  
Criminal Law Award--Outstanding work in the field of criminal law  
American Bar Association Gold Key Awards (2)--Law student awards for outstanding service to the organized Bar  
National Chairman, Law Student Division, American Bar Association, Pub Relations Committee  
National Vice President, Law Student Division, American Bar Association (First Woman elected to this position)  
Dean's Award--Outstanding scholarship  
Oklahoma Bar Association Award---Outstanding graduate from Oklahoma law schools (Oklahoma University, Tulsa University, Oklahoma City University)  
Class officer and member of law school Student Bar Board of Governors.

**PROFESSIONAL EXPERIENCE & ACTIVITIES:**

2014 - 2015, Sandler Films, Inc.  
*Attorney*

2001- 2005 KOGAP Enterprises, Inc., Medford, OR  
*Associate CEO, Sec-Treas & General Counsel*  
\* Restructuring Management and general legal issues

1990 - 1999 Self-Employed  
\* Private Practice of Law, Medford, OR  
\* Co-owner/Operator, So. Ore. Computer Consultants and WIN (Western Information Network)  
\* Selected by Jackson County Judges as one of twenty-five most qualified attorneys in Jackson County for court appointments  
\* Adjunct Professor, Southern Oregon State College (now So. Oregon Univ)

1988 - 1990 William H. Ferguson, Attorney, Medford, OR  
*Attorney*  
\* Employment cases, general trial practice and representing various large businesses

1983 - 1988 Grant, Ferguson, Carter, P.C., Medford, Oregon  
*Attorney*  
\* Business and trial practice. Specialized in employment cases/wrongful discharge.  
\* Court Appointed Counsel for Indigent Defense.