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14 **DISTRICT COURT – FAMILY DIVISION**

15 **CLARK COUNTY, NEVADA**

16 **LINDSEY SHARRON ANTEE,**

17 **Plaintiff,**

18 **vs.**

19 **BOBBY DEE ANTEE,**

20 **Defendant.**

Case No.: D-18-573154-D

Dept. No.: J

21 **DEFENDANT’S MOTION FOR ATTORNEY FEES AND COSTS**

22 Defendant BOBBY DEE ANTEE (“Bobby” or “Defendant”) by and through
23 his attorneys, the law firm of SHUMWAY VAN, pursuant to *Nevada Rules of Civil*
24 *Procedure* (“NRCP”) 11(b), 68 and *Nevada Revised Statutes* (“NRS”) and 18.010,
25 125.141, 125.150(4), files this Motion for Attorney Fees and Costs and Opposition
26 to Plaintiff’s Motion for Stay of Execution.
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1 This Motion is made and based upon the following Memorandum of Points
2 and Authorities, the Declaration of Grayson J. Moulton, Esq., the pleadings and
3 papers on file herein, and any oral argument the Court may allow at the time of
4 hearing.

5 DATED this 8th day of June, 2020.

6
7 **SHUMWAY VAN**

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9 

10 GRAYSON J. MOULTON, ESQ.
11 Nevada Bar No. 14587
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13 Las Vegas, Nevada 89123
14 *Attorneys for Defendant*

15 **MEMORANDUM OF POINTS AND AUTHORITIES**

16 **I. INTRODUCTION**

17 Plaintiff LINDSEY LICARI (“Lindsey” or “Plaintiff” first filed for divorce
18 nearly two years ago in June 2018. Since that time, Plaintiff has pursued expensive,
19 unnecessary litigation while repeatedly using her large social media presence to
20 defame and demean Bobby, wrongly stating that he defrauded her out of a home,
21 was a criminal, and a liar. During this time, Bobby has repeatedly tried to settle the
22 case, making the entirely reasonable offer to sell the house, and allow Lindsey to
23 take all the equity. Lindsey rejected these generous terms, made in the form of an
24 Offer of Judgment, and demanded more, going so far as to claim she was owed in
25 excess of \$98,000.00. At trial, Lindsey repeatedly made false statements to try and
26 build a case around this outrageous number, resulting in this Court repeatedly
27 finding that Lindsey’s testimony was “not credible.”¹
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¹ See Minute Order, dated May 22, 2020, on file with the Court herein.

This case should never have proceeded to trial. Bobby made an incredibly generous Offer of Judgment in May 2019, over a month after Plaintiff acquired new counsel. Additionally, Plaintiff repeatedly pushed out trial, delayed discovery, and increased litigation costs, all while defaming Bobby with regularity. The end result was vindication for Bobby: Plaintiff will not be receiving \$98,000+, but will be paying Bobby back \$6,000+ for expenses related to the home, solely responsible for \$10,000+ in taxes, and Bobby will receive a portion of the equity after the sale of the home. As a result, it is equitable and right that this Court award Bobby the entirety of his attorneys' fees in this case, as a sanction for Plaintiff's vexatious filings and harassing behavior. In the alternative, Bobby is owed attorney's fees and costs pursuant to statutes related to Offers of Judgment, as Bobby obtained a better result than the one he offered in May 2019.

II. STATEMENT OF FACTS

1) On June 26, 2018, Plaintiff filed her Complaint for Divorce and Summons related to the same.²

2) On September 18, 2018, Plaintiff filed a Motion for Orders for Temporary Spousal Support and/or Exclusive Possession.³ Within this Motion, Plaintiff falsely stated that her monthly income was \$0.00 in an effort to be awarded temporary alimony. In fact, Exhibit X showed that Plaintiff made at least \$24,236.00 during 2017, a monthly average of \$2,019.66. During testimony, Lindsey admitted that she did not earn all of these funds after the date of filing.

3) On this same date, Plaintiff filed a Financial Disclosure Form wherein she falsely claimed she made \$0.00 a month, and listed her only revenue as coming from her non-profit, Ayden's Army of Angels ("Ayden's Army").⁴ In Exhibit F, the tax return shows Lindsey was paid \$0.00 from Ayden's Army in 2017.

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² Register of Actions, on file with the Court.

³ See *Plaintiff's Motion and Notice of Motion for Orders for Temporary Spousal Support and/or Exclusive Possession*, on file with the Court.

⁴ See *Plaintiff's Financial Disclosure Form*, filed September 18, 2018, on file with the Court.

1 4) On October 19, 2018, the Court ruled that Plaintiff was not entitled to
2 temporary spousal support, and that while she would have exclusive possession of
3 the marital property (as she had since July 2018), she would be solely responsible
4 for all costs associated with the mortgage and utilities. The Court then set an
5 evidentiary hearing for March 2019.⁵

6 5) Shortly after the Order for the October hearing was filed on December
7 18, 2020, Plaintiff filed a Complaint for Separate Maintenance wherein she asked
8 for all of the same relief she had just been denied.⁶ Bobby asked the Court to dismiss
9 this action, as it was duplicitous and unnecessary.

10 6) On February 13, 2019, the Court granted Bobby's Motion to Dismiss
11 the Separate Maintenance action.

12 7) On February 6, 2019, Bobby served his First Request for Production of
13 Documents to Lindsey by having the same hand-delivered to the office of her
14 attorney.⁷

15 8) On March 26, 2019, the date that had been set for trial, the parties
16 agreed to continue the trial to the soonest available date after March 1, 2019.⁸ This
17 continuance was only necessary because Lindsey had refused to respond to
18 discovery requests made by Defendant. The time for trial was continued to August
19 6, 2019.

20 9) On May 2, 2019, Lindsey's attorney of record filed a Motion to
21 Withdraw as Attorney of Record, and on May 8, 2019, Lindsey obtained new
22 counsel.⁹

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27 ⁵ See *Order after Hearing*, dated October 12, 2018, on file with the Court.

28 ⁶ See Case No. D-18-581756-S, related to the above entitled case.

⁷ See *Affidavit of Service*, filed February 8, 2019, on file with the Court.

⁸ See *Stipulation and Order to Continue Trial*, filed March 26, 2019, on file with the Court.

⁹ See *Motion to Withdraw as Attorney of Record*, filed May 2, 2019, and *Substitution of Attorney*, filed May 8, 2019.

10) On May 28, 2019, three weeks after Lindsey obtained new counsel, Bobby served an Offer of Judgment on Lindsey's attorneys, via electronic service.¹⁰ Within this Offer of Judgment, Bobby offered to allow a Stipulated Agreement and Order to be entered under the following terms:

- The marital home located at 9564 Scorpion Track Ct., Las Vegas, Nevada 89178 would be sold and that Lindsey Antee would receive any equity left over in the house after the mortgage associated with the home was paid;
- The parties would both waive any right to alimony, and both parties would bare their own attorney's fees and costs.¹¹

11) From the date the Offer of Judgment was served, fourteen (14) days passed with no acceptance from Plaintiff, which constituted a rejection under the law.

12) At the time the Offer of Judgment was made (May 2019), the approximate value of the marital home was approximately \$286,400.00¹² according to Zillow.com and \$280,415.00 according to Redfin.com.¹³

13) At the time the Offer of Judgment was made, the current balance owed on the mortgage was \$200,732.14 according to Exhibit S.

14) On June 11, 2019, the parties filed a second Stipulation and Order to Extend Discovery Deadlines and Trial Date because Lindsey had again failed to respond to discovery, and had not produced any disclosures whatsoever.¹⁴ A new trial date was scheduled for February 7, 2020.

15) During the divorce process, between June 26, 2018 and the present day, Lindsey repeatedly took to social media, telling her large audience that Bobby was

¹⁰ **Exhibit 1 – Defendant's Offer of Judgment.**

¹¹ *Id.*

¹² "9564 Scorpion Track Ct Las Vegas, NV 89178." *Zillow*, www.zillow.com/homedetails/9564-Scorpion-Track-Ct-Las-Vegas-NV-89178/72240028_zpid/.

¹³ "9564 Scorpion Track Ct Las Vegas, NV 89178." *Redfin*, <https://www.redfin.com/NV/Las-Vegas/9564-Scorpion-Track-Ct-89178/home/29289217>.

¹⁴ *Stipulation and Order to Extend Discovery Deadlines and Trial Date*, filed June 11, 2019, on file with the Court.

1 “trying to put [her] out of the home,” and intimating that when she was firing a gun
2 at a shooting range, she was “picturing her husband’s face.” More recently, on May
3 29, 2020, Lindsey posted to Facebook and stated that Bobby Antee “continues to
4 watch these people commit fraud for his own financial gain...” and that she “will
5 never let [Bobby] get away with all the damage” he has caused in her life.¹⁵

6 16) As a result of Lindsey’s posts, Bobby was regularly subjected to hateful
7 messages and comments from her followers. Bobby was called “slime looking ass,”
8 a “piece of shit,” a “piece of scum,” and a “fucking loser looking for a meal ticket.”¹⁶

9 17) On May 22, 2020, in a Minute Order, the Court stated that Lindsey’s
10 testimony “was not credible” no less than five (5) times.”¹⁷ The Court applied this
11 marker of non-credibility to Lindsey’s claims about the following subjects:

- 12 • That Lindsey had no knowledge that Bobby’s student loans would
- 13 need to be paid off to qualify for a mortgage;
- 14 • That Lindsey never saw the second draft of the Letter of Agreement
- 15 until discovery;
- 16 • That Lindsey did not know she was wiring funds to close the sale
- 17 of the marital home;
- 18 • That Lindsey was not aware funds were removed from her bank
- 19 account until a couple days after the close of the sale;
- 20 • That Lindsey claims she never signed the Grant, Bargain, and Sale
- 21 Deed.

22 18) Within this same Minute Order, the Court never once found that
23 Bobby’s testimony, concerning any subject, “was not credible.”¹⁸

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27 ¹⁵ Exhibit 2 – Social Media Postings of Lindsey Licari aka Lindsey Antee.

28 ¹⁶ Exhibit 3 – Messages to Bobby Antee from various persons.

¹⁷ Minute Order, dated May 22, 2020, on file with the Court.

¹⁸ *Id.*

1 19) At trial, Lindsey advanced several claims that Bobby had damaged the
2 house, damaged her personal property, and caused her to incur medical expenses.
3 The Court found that all of these claims lacked evidence, and that Lindsey failed to
4 meet her burden of proof.¹⁹

5 20) After trial, the Court ordered the following:

- 6 • That the marital home would be sold, and that from the sale of the
7 home, Lindsey would receive \$75,000 pursuant to the Letter of
8 Agreement found in Exhibit H.
- 9 • That any remaining equity in the home would be split equally
10 between the parties.
- 11 • That Lindsey was entitled to \$650.00 that was garnished from the
12 parties' 2017 joint federal tax return to pay Bobby's child support
13 obligation.
- 14 • That Lindsey would be required to reimburse Bobby for the
15 expenses for the marital residence while she lived there exclusively.
- 16 • That Lindsey would be required to reimburse Bobby for the money
17 Lindsey charged to his account after the separation of the parties.

18 21) As of the date of this Motion, the value of the marital home is estimated
19 to be \$290,527.00 according to Zillow.com²⁰, and \$284,512.00 according to
20 Redfin.com.²¹

21 22) As of the date of this Motion, the current balance owed on the mortgage
22 is \$197,945.19, with Plaintiff having not made a payment on the same since April 1,
23 2020.²² With the necessary payments made to bring the loan current, the outstanding
24 principal balance would be approximately \$195,463.97.²³

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26 ¹⁹ *Id.*

27 ²⁰ "9564 Scorpion Track Ct Las Vegas, NV 89178." *Zillow*, www.zillow.com/homedetails/9564-Scorpion-Track-Ct-Las-Vegas-NV-89178/72240028_zpid/.

28 ²¹ "9564 Scorpion Track Ct Las Vegas, NV 89178." *Redfin*, <https://www.redfin.com/NV/Las-Vegas/9564-Scorpion-Track-Ct-89178/home/29289217>.

²² **Exhibit 4** – Wells Fargo Mortgage Statement from the Phone of Bobby Antee.

²³ *Id.*

23) On June 2, 2020, before a final Decree of Divorce had been filed, Plaintiff (without assistance of her counsel of record) filed a Motion for Stay of Execution of Divorce Order, in which she claimed her Sixth Amendment rights were violated, that she had a right to a new trial due to inadequate counsel.²⁴

24) In her Motion, Plaintiff also claimed that Bobby Antee “purposefully withheld evidence...submitted false statements, false documentation, and has repeatedly lied to the courts to conceal a crime.”²⁵ Plaintiff also attempts to claim as undisputed fact that “On January 17, 2018, a Quit Claim was forged in the name of Lindsey Licari.”²⁶ In support of this argument, Plaintiff provides as an exhibit the analysis of a undisclosed handwriting expert in Texas who wasn’t retained until May 30, 2020, more than six months after the close of discovery.

25) On the same day, and again without the assistance of her counsel of record, Plaintiff filed a Notice of Appeal and Case Appeal Statement, even though no final order has been entered. Plaintiff claimed as her justification for the appeal “Rena Hughes ordered to split my sole and separate property with Defendant, Bobby Antee, who only obtained ownership through fraud.”²⁷

26) On June 5, 2020, Lindsey issued a long screed on her Facebook page once again accusing Bobby of fraud related to the purchase of the home. Lindsey also repeatedly impugned the honor of the Honorable Judge Rena Hughes stating “I submitted 301 pages of evidence with 65 exhibits and judge Rena Hughes removed all of it out of the trial binder,” as well as “It also proves that **Judge Rena Hughes is a disgrace to the bench** and will manipulate a case to protect her rich friends. To attack me and my work to protect a criminal, is insane and unspeakable for a judge.” (*emphasis added*). This message was shared with Lindsey’s 31,924 followers on Facebook and with her 297,000 followers in Instagram.²⁸

²⁴ See Plaintiff’s Motion for Stay of Execution of Divorce Order, filed June 2, 2020, on file with the Court herein.

²⁵ *Id.*

²⁶ *Id.*

²⁷ See Notice of Appeal and Case Appeal Statement, filed June 2, 2020, on file with the Court herein.

²⁸ **Exhibit 5** – Facebook post and Instagram post dated June 5, 2020.

27) On the date of the filing of this Motion, Bobby became aware that on May 24, 2020, Lindsey gave a radio interview on the show “Veterans In Politics” in which she railed against this Court for the ruling issued on May 22, 2020.²⁹ During her interview, Lindsey made the following claims and misrepresentations:

- That Bobby’s testimony stated she (Lindsey) “never went to the lender, that he didn’t know [she] was on the title...and that I never was told about any date.” (This is egregiously false). (Time stamp 14:55);
- That she never went to the title company’s office to sign the Grant, Bargain, and Sale Deed (Time stamp 15:59);
- The detective assigned to her filed crime reports told her “quit filing fraudulent police reports.” (Time stamp 17:45);
- That Linda Naw and others “followed my story, they watched how much money I raised, and they watched [Bobby] steal ever cent I had, and then forged my name to a document to close their deal.” (Time stamp 20:12);
- Referring to the Honorable Judge Rena Hughes, “There are several things she said in that opinion that are completely false, and to me its just setting up a case for the realtor and the title company to get away with what they’ve done to me. And that’s wrong.” (Time stamp 35:43);
- Again referring to the Honorable Judge Rena Hughes, “She’s abusing her power, she’s lying on court records to manipulate outcomes.” (Time stamp 48:34).

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²⁹ Veterans in Politics. “Lindsey Licari discussed disgraced Clark County Family Court Judge Rena Hughes on the VIP talk show” *YouTube*, commentary by Jim Jonas, Lindsey Licari, and Steve Sanson, May 24, 2020. <https://www.youtube.com/watch?v=XOyIgX6Gcsk&feature=youtu.be>

1 28) On June 6, 2020, Lindsey filed a Motion for Court's Leave to File a
2 Third Party Complaint in Case No. A-18-786141-C, *Perdue v. Lindsey*. In her
3 Motion, Lindsey asks the Court for permission to bring additional claims against
4 numerous parties including Bobby Antee relating directly to the purchase of the
5 Marital Home that has been the center of these divorce proceedings.³⁰

6 29) Plaintiff's egregious and ill-conceived filings, both at present and in the
7 past, have caused Defendant to incur additional unnecessary attorneys fees and costs.

8 30) From the onset of the present litigation until the date of this Motion,
9 Bobby Antee has generated approximately **Thirty-Three Thousand and Twenty-**
10 **Two Dollars (\$33,022.00)** in attorneys' fees and **Seven Hundred and Four Dollars**
11 **and 41/100 (\$704.41)** in costs, for a total of **Thirty-Three Thousand, Seven**
12 **Hundred and Twenty-Six Dollars and 41/100 (\$33,726.41)**.³¹

13 31) From May 29, 2019, the date of service of the Offer of Judgment to the
14 date of this Motion, Bobby Antee has generated approximately **Twenty-Five**
15 **Thousand, Three Hundred and Sixty-Seven Dollars (\$25,367.00)** in attorneys'
16 fees and **Three Hundred and Fifteen Dollars and 33/100 (\$315.33)** in costs, for a
17 total of **Twenty-Five Thousand, One Hundred and Thirty Dollars and 33/100**
18 **(\$25,130.33)**.³²

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28 ³⁰ **Exhibit 6** – Motion for Court's Leave to File Third-Party Complaint, Case No. A-18-786141-C, filed June 6, 2020.

³¹ **Exhibit 7** – Billings and Costs from July 9, 2020 – June 6, 2020.

³² **Exhibit 8** – Billings and Costs from May 29, 2019 through June 6, 2020.

III. LEGAL ARGUMENT

A. **BOBBY IS ENTITLED TO ATTORNEY FEES AND COSTS AS PLAINTIFF'S SUIT WAS MAINTAINED WITHOUT REASONABLE GROUNDS AND OR TO HARASS BOBBY.**

NRS 18.010 states the following:

The court shall liberally construe the provisions of this paragraph in favor of awarding attorney's fees in all appropriate situations. It is the intent of the Legislature that the court award attorney's fees pursuant to this paragraph . . . in all appropriate situations to punish for and deter frivolous or vexatious claims and defenses because such claims and defenses overburden limited judicial resources, hinder the timely resolution of meritorious claims and increase the costs of engaging in business and providing professional services to the public.³³

In the present case, from the onset of this litigation Plaintiff has not acted with a goal of settlement. Instead, Plaintiff has acted solely with the purpose of punishing and harassing Bobby, often through the filing on unnecessary Motions and Petitions, forcing Bobby to respond and incur increased fees and costs. In fact, on two separate occasions, Plaintiff has filed unnecessary and illegitimate Motions or Petitions. First, shortly after Lindsey failed to receive temporary spousal support, and after she was forced to start paying the mortgage on the marital property, Lindsey filed a Petition for Separate Maintenance asking this Court for the very things she had just been denied. Second, after being found "not credible" and losing the claims on which her case depended on entirely, Lindsey files a Motion to Stay and an Appeal, both without proper grounds and without going through counsel of record. Additionally, Lindsey has repeatedly impugned the honor of Bobby and of this Court to her large audience, through the means of social media and radio/video interviews. Any time that Lindsey has been told "no" by this Court, she has thrown literal and figurative tantrums by weaponizing the Court system to harass Bobby with claims that have already been litigated and found to be without merit.

³³ *Id.* at (2)(b).

1 Additionally, this case has repeatedly been delayed because of Lindsey's
2 refusal to provide documents, and her regular shuffling between attorneys.
3 Combined with her personal filings, done without the assistance of counsel, Plaintiff
4 has absolutely acted frivolously and vexatiously, and her actions have resulted in the
5 burdening of judicial resources, the hinderance of timely resolution, and have
6 exponentially increased the costs of litigation. The Court has broad discretion under
7 NRS 18.010 to sanction a party "in all appropriate situations." The circumstances
8 have rarely been so appropriate. This Court should sanction Plaintiff in the form of
9 attorney's fees and costs as directed in NRS 18.010(b), for a total of **Thirty-Three**
10 **Thousand and Twenty-Two Dollars (\$33,022.00)** in attorneys' fees and **Seven**
11 **Hundred and Four Dollars and 41/100 (\$704.41)** in costs for a total of **Thirty-**
12 **Three Thousand, Seven Hundred, and Twenty Two Dollars and 41/100**
13 **(\$33,726.41).**

14 **B. PURSUANT TO NRCP 68 AND NRS 125.141, PLAINTIFF MUST**
15 **PAY BOBBY'S ATTORNEY FEES AND COSTS INCURRED**
16 **AFTER MAY 29, 2019.**

17 NRCP 68(a) states that "[A]t any time more then 10 days before trial, any
18 party may serve an offer in writing to allow judgment to be taken in accordance with
19 its terms and conditions." Furthermore, NRCP 68(e) states "If the offer is not
20 accepted within 10 days after service, it shall be considered rejected." NRCP 68 (f)
21 also states the following:

22 If the offeree rejects an offer and fails to obtain a more favorable
23 judgment,

24 (1) the offeree cannot recover any costs or attorney's fees and shall not
25 recover interest for the period after the service of the offer and
26 before the judgment; and

27 (2) the offeree **shall pay** the offeror's post-offer costs, applicable
28 interest on the judgment from the time of the offer to the time of
entry of the judgment and reasonable attorney's fees, if any be
allowed, actually incurred by the offeror from the time of the offer.³⁴

³⁴ NRCP 68(f)(2) (emphasis added).

This language is mirrored in NRS 125.141 which states that in any action for divorce, a party may serve a written offer to allow a decree to be entered concerning the property rights of the parties in accordance with the terms and conditions of the offer.³⁵ If the offer is rejected, and the party who rejected the offer fails to receive a more favorable judgment concerning the property rights that would have been resolved by the offer if it had been accepted, the Court may order the party who rejected the offer to pay the reasonable attorney's fees incurred by the offerer after the date of the offer.³⁶ In determining whether to award attorney's fees, NRS 125.141(5) details other factors the court shall consider, including:

- a) Whether each party was represented by counsel when the offer was made;
- b) Whether the issues related to the property rights of the parties were conducive to an offer made;
- c) Whether the offer was made in good faith and was reasonable with respect to its timing and its amount;
- d) Whether rejection of the offer was done in bad faith or was grossly unreasonable;
- e) Whether during the pendency of the divorce action, the conduct of the party who rejected the offer furthered or frustrated the policy of the law to promote settlement of litigation and to reduce the costs of litigation by encouraging cooperation between the parties and their counsel;
- f) Whether the judgment differs from the terms and conditions of the offer in such a manner, with respect to the property rights that would have been resolved by the offer if it had been accepted, that the court cannot make a clear determination whether the party failed to obtain a more favorable judgment concerning those property rights;
- g) Whether there were substantial changes in issues such that the court cannot make a clear determination whether the party failed to obtain a more favorable judgment.

In the present matter, it is clear that Bobby made an Offer of Judgment on May 29, 2019. In that Offer of Judgment, Bobby offered to have the Marital Home sold, and to give all equity, then estimated to be approximately \$80,000 - \$86,000,

³⁵ NRS 125.141(1).

³⁶ NRS 125.141(4).

1 to Lindsey. In addition, both parties would assume their own fees and costs. This
2 Offer was not accepted by Plaintiff within fourteen (14) days, which constitutes a
3 rejection under the statute.

4 At trial, the Court ordered that the marital property would be sold and that
5 Lindsey would receive \$75,000.00 from the same; the parties would then split any
6 remaining equity equally. Additionally, the Court Lindsey to reimburse Bobby for
7 the expenses of the marital residence while she lived there exclusively (\$6,113.36)³⁷
8 and to assume the entirety of the 2017 IRS Tax debt, totalling \$10,170.00.³⁸ At the
9 moment, the approximate estimate of the equity in the Marital Home is
10 approximately \$89,000-\$95,000. These terms are all substantially better outcomes
11 for Bobby than what was offered in May 2019. An examination of the factors from
12 NRS 125.141(5) will show that Bobby is rightfully owed all attorney's fees
13 stemming from the date of the Offer.

14 a) At the time the Offer was made, Lindsey had counsel as her current
15 counsel of record had filed a Substitution of Attorney on May 8, 2019. Additionally,
16 Bobby was represented by the same counsel he has had for the duration of this case.
17 Lindsey's counsel had been in place for three (3) weeks before the Offer was made.
18 Plaintiff had adequate counsel.

19 b) As both parties had testified at the hearing in October 2018, this case
20 was entirely about how the Marital Home should be divided. In fact the Order for
21 that hearing specifically stated the evidentiary hearing for this matter would be "to
22 consider issues surrounding the marital residence." As such, an Offer relating
23 directly to the sale and division of that property is conducive to the issues at hand.

24 c) The Offer made by Bobby was in incredibly good faith. Bobby offered
25 to end the divorce by giving all of the equity, estimated to be approximately \$80,000-
26 \$86,000, to Lindsey. This would have resulted in Bobby walking away from the
27 money he spent on the home while Lindsey was the only one living there, as well as

28 ³⁷ See Exhibits S, T, U, and V.

³⁸ See Exhibit X

1 shoulding half of the debt the parties acquired, all for the sake of ending litigation
2 and allowing the parties to move on with their lives.

3 d) Like almost all behaviors of Plaintiff's, the rejection of the Offer was
4 in bad faith. Instead of accepting the enormous amount of equity and walking away,
5 Lindsey insisted that she was owed, not only the whole house, but an additional
6 \$26,000.00. Lindsey's refusal to accept this offer was grossly unreasonable.

7 e) As has been detailed in this Motion, Lindsey repeatedly frustrated
8 attempts to settle the case; refusing to provide documents until threatened with a
9 Motion to Compel, and regularly harassing and slandering Bobby on social media.
10 Lindsey's behavior was directly responsible for increasing litigation costs, as she
11 regularly failed to cooperate with either Bobby or her own counsel.

12 f) In this case, the judgment passed down from the Court bears directly
13 on the property rights implicated in the Offer of Judgment. Indeed, the Court has
14 ordered Lindsey to receive \$75,000, which Bobby to receive half of any remaining
15 equity. In addition, Lindsey was ordered to pay Bobby over \$6,000.00 and to assume
16 \$10,000.00 of debt that had been in both their names. As a result, Bobby has received
17 a better judgment than his offer, which was to give Lindsey all of the equity.

18 g) Lastly, while Lindsey attempted to introduce other issues and claims
19 involving money, the heart of the trial was always the Marital Home, how it was
20 acquired, and what should be done with it.

21 Because Lindsey rejected the Offer of Judgment made by Bobby, she needed
22 to receive a judgment more favorable than "all the equity in the home." She failed
23 to do so. Additionally, all the factors to be considered under NRS 125.141 also
24 support an award of attorney's fees and costs to Bobby, for, **at minimum**, all fees
25 and costs incurred since May 29, 2020. This amounts to a minimum total of **Twenty-**
26 **Five Thousand, One Hundred and Thirty Dollars and 33/100 (\$25,130.33)**
27 **including Twenty-Five Thousand, Three Hundred and Sixty-Seven Dollars**
28

1 (\$25,367.00) in attorneys' fees and **Three Hundred and Fifteen Dollars and**
2 **33/100 (\$315.33)** in costs incurred since May 29, 2020.

3 **C. THIS COURT SHOULD AWARD BOBBY ATTORNEY'S FEES**
4 **AND COSTS UNDER NRS 125.150(4).**

5 NRS 125.150(4) states "[e]xcept as otherwise provided in NRS 125.141,
6 whether or not application for suit money has been made under the provisions of
7 NRS 125,040, the court may award reasonable attorney's fees to either party to an
8 action for divorce." In the present case, Bobby has consistently requested that the
9 Court award him attorney's fees for constantly having to deal with Plaintiff's abuse,
10 vexatious behavior, and overlitigation of the case. Bobby's first request came in
11 Opposition to Plaintiff's Motion for Temporary Orders in October 2018, and he
12 reiterates it today. This court can and should award Bobby the entirety of his
13 attorney's fees and costs incurred in this case. The ideal of law is that both parties
14 will work together with the Court in good faith to arrive at an equitable outcome.
15 That ideal has been, and continues to be, repeatedly thwarted by Lindsey's crazed
16 desire to have someone hang for her mistakes. This Court can, and should, award
17 Bobby the entirety of his attorney's fees incurred as a sanction against Lindsey for
18 wasting valuable judicial time and resources instead of settling her divorce claims.

19 **D. PLAINTIFF'S ATTORNEYS FEES AND COSTS ARE**
20 **REASONABLE UNDER THE *BRUNZELL* FACTORS.**

21 In *Barney v. Mt Rose Heating & Air Conditioning*, citing *Brunzell*, the Court
22 "enumerated factors that the District Court should consider in awarding attorneys'
23 fees, with no one factor controlling, as follows:

- 24 (1) the advocate's qualities, including ability, training, education,
25 experience, professional standing, and skill;
26 (2) the character of the work, including its difficulty, intricacy,
27 importance, as well as the time and skill required, the responsibility
28 imposed, and the prominence and character of the parties when
affecting the importance of the litigation;

- (3) the work performed, including the skill, time, and attention given to the work; and
- (4) the result—whether the attorney was successful and what benefits were derived.”³⁹

In this case, Bobby’s counsel has incurred **Thirty-Three Thousand, Seven Hundred and Twenty-Six Dollars and 41/100 (\$33,726.41)** in fees in conjunction with this matter, which is reasonable under the *Brunzell* factors.

1. Qualities of the Advocates

Grayson J. Moulton, Esq., an associate with Shumway Van, served as lead counsel for Bobby Antee and supervised all work on the matter. Mr. Moulton has been licensed as an attorney in the State of Nevada since October 2017 and has been practicing family law, almost exclusively, ever since. Mr. Moulton has earned a reputation for competent representation, attention to detail, and providing persuasive argument on behalf of his clients. In addition to being admitted to practice in this Court, he is also admitted to the United States Federal District Court for the District of Nevada. During the course of this litigation, Mr. Moulton billed at a rate of \$165 per hour, until the beginning of 2020 when he began to bill at \$215 an hour. Mr. Moulton’s rates are consistent with other similarly experienced attorneys practicing in the Las Vegas area. Paralegal staff were also engaged on this matter. The rates charged for paralegal time ranged from \$55 per hour to \$125 per hour.

2. The Character of the Work Performed

In order to properly defend this suit and in an effort to resolve this matter prior to trial, counsel prepared numerous motions, oppositions, stipulations and documents. These filings all requested research to interpret relevant case law and statutes, attaching relevant support documentation to the filings, engaging in oral advocacy and advising clients on the legal interpretation of relevant factors.

During discovery, counsel had to conduct research and learn about various ways in which gifts, joint tenancy of bank accounts, and contracts all intersected in

³⁹ *Barney v. Mt. Rose Heating & Air*, 192 P.3d 730, 736 (Nev., 2008), citing *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969)

1 the context of marriage and community property. Additionally, counsel had to
2 prepare and respond to discovery requests, which included pouring over numerous
3 documents and communications. Moreover, counsel repeatedly performed all
4 discovery within the allotted time frames provided by the Court.

5 Finally, counsel had to defend Bobby's position in a bench trial. The
6 preparation for a successful outcome at trial is no easy task. Every exhibit had to be
7 reviewed in addition to all of the discovery that was not admitted to trial had to be
8 reviewed for potential relevance. Additionally, counsel had to meet with various
9 witnesses, including some who were not called at trial, to prepare them for the rigors
10 of sworn testimony. All of these preparations for trial do not encompass the time that
11 Grayson J. Moulton, Esq. had to actually spend at the trial, which took his time and
12 attention away from other matters in his practice.

13 The law firm of Shumway Van recorded has 259 hours, and continues to
14 record more, on this matter, which is reasonable based on the time and labor required
15 to go to trial, the novelty of the issues, the skill required to properly defend this
16 matter, and the vexatious and overly litigious nature of the Plaintiff.

17 3. The Work Actually Performed

18 As stated above, counsel for Bobby Antee engaged in substantive motion
19 practice aimed at limiting the scope of issues at trial as well as to attempt significant
20 resolution prior to trial. Bobby's counsel propounded discovery in the form of requests
21 for production of documents. Counsel committed significant time to researching
22 applicable case law concerning gifts, bank accounts held in joint tenancy, as well as
23 fraud when contained within the context of marriage. Counsel committed significant
24 time and effort to the case in preparing for trial, including reviewing the documents
25 for relevance and utility for use at trial, and prepared direct and cross examinations
26 of several witnesses.

27 ...

28 ...

4. The Results Obtained

Bobby was ultimately successful defending against Lindsey's claims, with the Court ruling in his favor on a wide variety of issues. In her Pre-trial Memorandum and Motion for Partial Summary Judgment, Plaintiff asked the court for the following items:

- \$1,772.86 for a medical bill she claims she incurred;
- \$1,300.00 for funds garnished by the IRS in 2017;
- \$1,300.00 for Plaintiff's lease break fee prior to the marriage;
- The entirety of the equity in the Marital Home;
- \$26,100.00 in additional cash;
- \$20,000.00 in attorney's fees and costs;
- To find that Defendant obtained his interest in the Marital Home via fraud;

Instead, the Court ruled that Lindsey was only entitled to \$75,000.00 based on the Letter of Agreement, and that the remaining equity would be split equally. Additionally the court ruled that Lindsey would be solely responsible for her medical bill, a \$10,000 IRS bill, that she would have to reimburse Bobby approximate \$6,000, and that she wouldn't recover any additional funds. Lindsey's requests throughout litigation, as well as her claims made at trial, were deemed "not credible," vindicating the vigorous defense of Bobby's claims. As a result, the attorneys fees stemming from such a result are reasonable.

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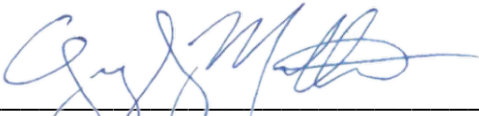
1 **IV. CONCLUSION**

2 Accordingly, as a result of the foregoing, Bobby respectfully requests this
3 Court for the following relief:

- 4 • An appropriate award of attorneys' fees in the amount of **Thirty-Three**
5 **Thousand, Seven Hundred and Twenty-Six Dollars and 41/100**
6 **(\$33,726.41);**
- 7 • Or in the alternative **Twenty-Five Thousand, One Hundred and Thirty**
8 **Dollars and 33/100 (\$25,130.33)** for fees and costs incurred after the Offer
9 of Judgment.
- 10 • That this amount be reduced to judgment and collectible by any lawful
11 means, including from the equity in the Marital Home;
- 12 • That Lindsey Antee fka Lindsey Licari be labeled a vexatious litigant;
- 13 • Any other relief the Court sees fit to grant at this time;

14 DATED this 8th day of June, 2020.

15 **SHUMWAY VAN**

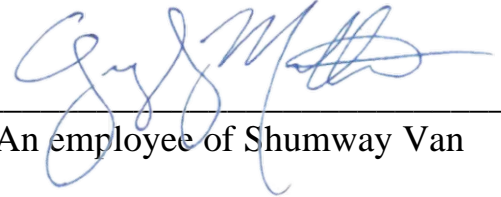
16
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18 _____
19 GRAYSON J. MOULTON, ESQ.,
20 Nevada Bar No. #14587

21 8985 South Eastern Avenue, Suite 100
22 Las Vegas, Nevada 89123
23 *Attorney for Defendant Bobby Antee*
24
25
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that the foregoing **DEFENDANT'S MOTION FOR ATTORNEY FEES AND COSTS AND OPPOSITION TO PLAINTIFF'S MOTION FOR STAY OF EXECUTION** was submitted electronically for filing and/or service with the Eighth Judicial District Court on the 8th day of June, 2020.



An employee of Shumway Van

DECLARATION OF GRAYSON J. MOULTON, ESQ. PURSUANT TO
BRUNZELL V. GOLDEN GATE NAT'L BANK IN SUPPORT OF
DEFENDANT BOBBY ANTEE'S MOTION FOR ATTORNEY FEES AND
COSTS

I, GRAYSON J. MOULTON, ESQ. being first duly sworn, deposes and says:

1. I am a partner in the law firm of SHUMWAY VAN and licensed to practice law in the State of Nevada. This affidavit is submitted in support of Defendant Bobby Antee's ("Defendant" or "Bobby") Motion for Attorney Fees and Costs in the instant matter.

2. I am the attorney for Bobby and I have personal knowledge of the above attorney fees, that the items contained in the Motion for Fees are true to the best of this Affiant's knowledge and belief.

3. I am the author of the Motion for Fees and hereby affirm that all factual representations contained in said Motion are true and correct to the best of my knowledge, and that I have personal knowledge of the facts upon which all such representations are based.

4. Exhibit 5 attached to the Motion represents a true and correct compilation of the redacted billing entries recording the events, times and amounts charged to Bobby Antee for Shumway Van's services from July 2018 through June 2020 associated with the instant matter.

5. Exhibit 6 attached to the Motion represents a true and correct compilation of the redacted billing entries recording the events, times and amounts charged to Bobby Antee for Shumway Van's services from May 29, 2019 through June 2020 associated with the instant matter.

6. The fees identified in Bobby's Motion for Attorney Fees and Costs are warranted for the reasons stated in the Motion and as outlined below.

1 7. Pursuant to *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345, 455 P.2d
2 31, 33 (1969), the attorneys' fees, costs and charges are reasonable, and the Court
3 should award the same. The *Brunzell* factors are as follows:

4 **a. Qualities of the advocates.**

5 Grayson J. Moulton, Esq., an associate with Shumway Van, served as lead
6 counsel for Bobby Antee and supervised all work on the matter. Mr. Moulton has
7 been licensed as an attorney in the State of Nevada since October 2017 and has been
8 practicing family law, almost exclusively, ever since. Mr. Moulton has earned a
9 reputation for competent representation, attention to detail, and providing persuasive
10 argument on behalf of his clients. In addition to being admitted to practice in this
11 Court, he is also admitted to the United States Federal District Court for the District
12 of Nevada. During the course of this litigation, Mr. Moulton billed at a rate of \$165
13 per hour, until the beginning of 2020 when he began to bill at \$215 an hour. Mr.
14 Moulton's rates are consistent with other similarly experienced attorneys practicing
15 in the Las Vegas area. Paralegal staff were also engaged on this matter. The rates
16 charged for paralegal time ranged from \$55 per hour to \$125 per hour.

17 **b. The character of the work performed.**

18 In order to properly defend this suit and in an effort to resolve this matter prior
19 to trial, counsel prepared numerous motions, oppositions, stipulations and
20 documents. These filings all requested research to interpret relevant case law and
21 statutes, attaching relevant support documentation to the filings, engaging in oral
22 advocacy and advising clients on the legal interpretation of relevant factors.

23 During discovery, counsel had to conduct research and learn about various
24 ways in which gifts, joint tenancy of bank accounts, and contracts all intersected in
25 the context of marriage and community property. Additionally, counsel had to
26 prepare and respond to discovery requests, which included pouring over numerous
27 documents and communications. Moreover, counsel repeatedly performed all
28 discovery within the allotted time frames provided by the Court.

1 Finally, counsel had to defend Bobby's position in a bench trial. The
2 preparation for a successful outcome at trial is no easy task. Every exhibit had to be
3 reviewed in addition to all of the discovery that was not admitted to trial had to be
4 reviewed for potential relevance. Additionally, counsel had to meet with various
5 witnesses, including some who were not called at trial, to prepare them for the rigors
6 of sworn testimony. All of these preparations for trial do not encompass the time that
7 Grayson J. Moulton, Esq. had to actually spend at the trial, which took his time and
8 attention away from other matters in his practice.

9 The law firm of Shumway Van recorded 259 on this matter (and continues to
10 incur more) which is reasonable based on the time and labor required to go to trial,
11 the novelty of the issues, the skill required to properly defend this matter, and the
12 vexatious and overly litigious nature of the Plaintiff.

13 **c. The work actually performed.**

14 As stated above, counsel for Bobby Antee engaged in substantive motion
15 practice aimed at limiting the scope of issues at trial as well as to attempt significant
16 resolution prior to trial. Bobby's counsel propounded discovery in the form of requests
17 for production of documents. Counsel committed significant time to researching
18 applicable case law concerning gifts, bank accounts held in joint tenancy, as well as
19 fraud when contained within the context of marriage. Counsel committed significant
20 time and effort to the case in preparing for trial, including reviewing the documents
21 for relevance and utility for use at trial, and prepared direct and cross examinations
22 of several witnesses.

23 **d. The results obtained.**

24 Bobby was ultimately successful defending against Lindsey's claims, with the
25 Court court ruling in his favor on a wide variety of issues. In her Pre-trial
26 Memorandum and Motion for Partial Summary Judgment, Plaintiff asked the court
27 for the following items:

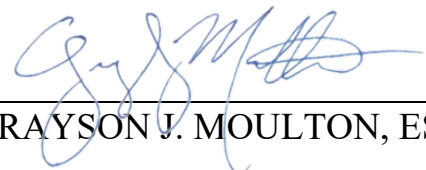
- 28
 - \$1,772.86 for a medical bill she claims she incurred;

- \$1,300.00 for funds garnished by the IRS in 2017;
- \$1,300.00 for Plaintiff's lease break fee prior to the marriage;
- The entirety of the equity in the Marital Home;
- \$26,100.00 in additional cash;
- \$20,000.00 in attorney's fees and costs;
- To find that Defendant obtained his interest in the Marital Home via fraud;

Instead, the Court ruled that Lindsey was only entitled to \$75,000.00 based on the Letter of Agreement, and that the remaining equity would be split equally. Additionally the court ruled that Lindsey would be solely responsible for her medical bill, a \$10,000 IRS bill, and that she wouldn't recover any additional funds. Lindsey's requests throughout litigation, as well as her claims made at trial, were deemed "not credible," vindicating the vigorous defense of Bobby's claims. As a result, the attorneys fees stemming from such a result are reasonable.

6. In light of the foregoing, Bobby's request of attorney fees in the amount of Thirty-Three Thousand, Seven Hundred and Twenty-Six Dollars and 41/100 (\$33,726.41) against Plaintiff Lindsey Antee, aka Lindsey Licari is reasonable under local and Nevada standards.

7. I declare under penalty of perjury that the foregoing is true and correct.¹
EXECUTED this 8th day of June, 2020.


GRAYSON J. MOULTON, ESQ.

¹ **NRS 53.045** ("Use of unsworn declaration in lieu of affidavit or other sworn declaration. Any matter whose existence or truth may be established by an affidavit or other sworn declaration may be established with the same effect by an unsworn declaration of its existence or truth signed by the declarant under penalty of perjury, and dated, in substantially the following form.")

EXHIBIT 1

SHUMWAY VAN
8985 South Eastern Ave., Ste 100
Las Vegas NV 89123
Tel (702) 478-7770 Fax (702) 478-7779

OFFER

MICHAEL C. VAN, ESQ.

Nevada Bar No. 3876

GRAYSON J. MOULTON, ESQ.

Nevada Bar No. 14587

SHUMWAY VAN

8985 South Eastern Avenue, Suite 100

Las Vegas, Nevada 89123

Tel (702) 478-7770

Fax (702) 478-7779

Email: michael@shumwayvan.com

grayson@shumwayvan.com

Attorneys for Defendant

**DISTRICT COURT – FAMILY DIVISION
CLARK COUNTY, NEVADA**

LINDSEY SHARRON ANTEE,

Plaintiff,

vs.

BOBBY DEE ANTEE

Defendant.

Case No.: D-18-573154-D

Dept. No.: J

**DEFENDANT’S OFFER OF
JUDGMENT**

TO: Lindsey Antee, Plaintiff;

TO: Logan Wilson, Esq., attorney of record for Plaintiff.

Defendant Bobby Dee Antee hereby offers to allow a Stipulated Agreement and Order to be entered under the following terms:

- The marital home located at 9564 Scorpion Track Ct., Las Vegas, Nevada 89178 shall be sold;
- Plaintiff Lindsey Antee shall receive any equity left over in the home after the mortgage associated with the home is paid;
- Defendant and Plaintiff will both waive any right to alimony;
- Defendant and Plaintiff will each bare their own costs for attorney fees.

...

...

1 This Offer of Judgment is made solely for the purposes specified in NRS
2 125.141 and is in no way an admission of liability, nor is it an admission that
3 Plaintiff is entitled to any relief, including, but not limited to, an award of damages,
4 attorney's fees, costs or interest. Defendant waives no defenses or causes of action
5 by virtue of this Offer of Judgment.

6 In the event this Offer of Judgment is accepted by Plaintiff, a Stipulated
7 Agreement and Order bearing the terms offered herein will be provided within a
8 reasonable time and Plaintiff will sign the same.

9 If this Offer of Judgment is not accepted within fourteen (14) days of service
10 by Plaintiff, then this offer shall be deemed rejected and withdrawn.

11 DATED this 28 day of May, 2019.

12 SHUMWAY VAN

13 

14 MICHAEL C. VAN, ESQ., #3876
15 GRAYSON J. MOULTON, ESQ., #14587
16 8985 S. Eastern Ave, Suite 100
17 Las Vegas NV 89123
18 Attorneys for Defendant
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21
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25
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27
28

SHUMWAY VAN
8985 South Eastern Ave., Ste 100
Las Vegas NV 89123
Tel (702) 478-7770 Fax (702) 478-7779

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of SHUMWAY VAN and a true and correct copy of the foregoing OFFER OF JUDGMENT was electronically filed and served via the Eighth District Court's e-filing system on the following recipient on May 28th, 2019:

Lindsey Antee
c/o Logan G. Wilson, Esq.
Jennings & Fulton, Ltd.
2580 Sorrel Street
Las Vegas, NV 89146



An employee of Shumway Van

EXHIBIT 2



Comments



1d



aydensarmyofangelsofficial I will but right now I am going through an awful divorce, I was just used and now he is fighting to take more money from me, so once this is over yes I would love to have another with the right person and In the right mind state. I would have never gotten used and taken advantage of the way I was if I had been in my right mind, but people take advantage of opportunities and this loser Bobby Antee did just that. So thank god I didn't have one with him. A child isn't a meal ticket.



21h 48 likes Reply

[View previous replies \(8\)](#)

aydensarmyofangelsofficial
[@asodsmommy](#) me too until I found out he spent over 20k and then didn't even put me on the title to the home I paid for. People are snakes and don't care who they hurt



20h 1 like Reply



aydensarmyofangelsofficial
[@shan_non5022](#) I am just happy I protected myself and I kept records



20h 6 likes Reply



d_htx [@aydensarmyofangelsofficial](#)
you're right stay strong



20h Reply



stacistl [@aydensarmyofangelsofficial](#)
my prayers are with you, you've been



Comment as realestatewinning...

[Post](#)

Done

4 of 4

7 hrs · 🌐

**Kesha Sanders**

I knew I did not like him when I saw him

6h Like Reply



13

**Lindsey Sharron**

Now he is trying to put me out the home my son bought and he had me sell my car

6h Like Reply



20

**Ashley Nicole Suggs**

Wtf. I would sue his ass

6h Like Reply



3

**Bridgette Emons**

This is unreal! He can't do that shit! Take him to court and sue him for everything he has! I'm so sorry u are going through this. He's a very evil person. You're in my prayers!

6h Like Reply



1

**Monique JuJu's Nonnie McClary**

Kesha Sanders you read my mind!!! I just didn't want to bring



Write a comment...



Media



Lindsey Sharron is with **Vanessa Cobian**.



Jul 15 at 2:06pm • 🌐

I think I'm getting better!!



👍❤️😱 175

14 Comments



Like



Comment



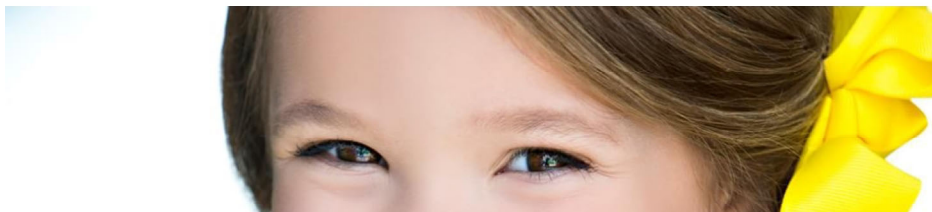
Share



Lindsey Sharron shared a link.



Jul 15 at 1:49pm • 🌐





Replies

**Mimi Lop**

Hope you pictured your husbands face

1d

Like

Reply

**Lindsey Sharron**Lol my best friend said the same thing.
God will deal with him

1d

Like

Reply

**Mimi Lop**

Yes he will....God don't like ugly

I like the way your bff thinks 🤔🤔🤔🤔

1d

Like

Reply

**Marvs Mel****Lindsey Sharron** I really admire you.
God's vengeance is worse than what
man can do. **#HelsOnTheCase**

1d

Like

Reply

**Lindsey Sharron****Marvs Mel** exactly 💪🏻🔴

1d

Like

Reply



Write a reply...



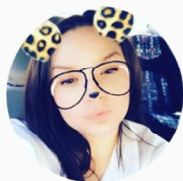
**Lindsey S LiCari**May 27 at 6:03 PM • 

So let me get this right. Someone can be killed for being suspected of forgery in a store , but I have proven these people forged my name and they are trying to use people they know to avoid prosecution. GlVar, NRED, LVMPD, even the courts, are all trying to hide their corruption. This needs to stop, and sadly Bobby Antee, a black man, being used by these people, allows them to attack me with lies, and he continues to watch these people commit fraud for his own financial gain. Not caring for one second what I have been through, and what this is putting me through. This is why things like this happen, because of people like him. To bad doing the right thing doesn't matter Bobby, maybe you will wait until there is blood shed because of you before you be a man. I will never let you all get away with the damage you have caused my life. [#stopthecorruption](#) [#blacklivesmatter](#) [#equalpunishment](#) [#watchgod](#) [#justiceforgeorge](#) [#criminalsbelongin jail](#)

**Lindsey S LiCari** added 7 new photos.Feb 23 at 4:33 PM • 

Now the divorce is finally over and Bobby went to court and told the truth! I never agreed not to be on the title of my home. I never went to the lender and I was never shown any docs. I

EXHIBIT 3



Nikki Powell

You and Nikki Powell aren't connected on Facebook

Lives in Milton, Delaware

You added Nikki on Jun 26, 2018

JUN 26 AT 1:33 PM

Nikki added you on Messenger.

Your a seriously a piece of shit



Why would you take advantage of her like that



You accepted Nikki's request.

JUN 26 AT 4:11 PM

I dont know u so domt judge me but shes lying for more pity



Wave to Nikki

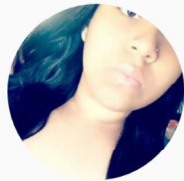




100% 7:09 PM



Dajdrion



Dajdrion Aneē Narcisse

You and Dajdrion Aneē Narcisse aren't connected on Facebook

Went to Dutchtown High School

Lives in Gonzales, Louisiana

You added Dajdrion on Messenger

6:50 PM



Your a piece of shit for what you did to Lindsey.. Hope you rot in hell scum bag

You accepted Dajdrion's request.

Go watch tv! U dont have a clue. U all believe what ever she says

Get a life

Just from the messages between u guys ur a piece of scum

Your the one who needs a life apparently

But god handles everything in the end and there's karma as well soooo you have fun with that



You can't reply to this conversation. [Learn More](#)

EXHIBIT 4

1:37

100%



connect.secure.wellsfargo.com



WELLS FARGO



MORTGAGE

...8226



Make Payment



View Statements



Manage Alerts

Outstanding principal balance \$197,945.19

Next payment due on 04/01/20 \$1,240.61

[Next payment details](#)

Total amount due to make loan
current \$2,481.22

[Show more detail](#)



Transactions



Mortgage refinance analysis

HAZARD INS PMT

03/12/20

Amount

\$607.00



N



EXHIBIT 5

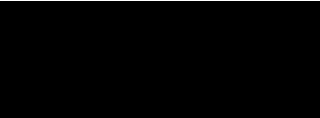


Lindsey S LiCari
June 5 at 10:13 AM ·

Share share share share share share: I have gone through complete hell for 3 years, going from one nightmare to another. I married a man who's only purpose was to take everything I had and with the help of Linda naw perdue, National Title Company, Era Brokers, Valleywest mortgage, Nikki Bott, Bobby Antee, Glvar, NRED, he was able to almost do it and put me through 3 years of hell. Mocking my work, the death of my son, and the honesty of my heart. They have defamed me on social media, and made me feel like a prisoner in my own home and everyday life. So Linda Naw your a liar, a racist, and an oppprtunist who will prey on anyone to make a dollar, even the families you claim to support through your fake foundation! So what did you mean by "these people?" Black people? Because besides that, I am a honest, loving and giving person, who is always willing to do the right thing. You have minipulated my divorce by sending Bobby to your lawyers to cover up what you have done. White collar crimes are crimes! You have tried to use who you know to avoid responsibility. I have reported this to GLVAR, NRED, LVMPD, Secretary of State, and now the FBI. GLVAR covered it up, NRED covered it up, Tracy Bouchard covered it up, Bobby Antee my own husband told me "you can't beat them, so I'm lying too" after he watched my son take his last breath. I have followed every piece of the process and you know who has helped me? No one! I have emailed the governor! I emailed the senators! I have reached out to civil right activist and through all of this I have got no justice, only people who continue to accuse me regardless of the evidence brought before them. I submitted 301 pages of evidence with 65 exhibits and judge Rena Hughes removed all of it out of the trial binder at the end of trial and prior to ruling. My counsel called no witnesses even though I brought one and let them know in advance that she was coming. She then made a ruling based on lies, and things that's were not even said In trial, to again protect the Title Company and this disgusting Realtor, Linda Naw Perdue. This is why there are injustice, had I done this, they would have arrested me in seconds, but because these people have money and know people, justice shouldn't apply to them? How can we trust a legal system that can be so easily manipulated? I want justice, and I want them all arrested and held accountable! I have now took this a step further and I got a Forensic Handwriting Expert to again prove, I did not sign this and I know have a notarized expert letter of opinion to prove everything I have said. It also proves that Judge Rena Hughes is a disgrace to the bench and will manipulate a case to protect her rich friends. To attack me and my work to protect a criminal, is insane and unspeakable for a judge. I have now called LVMPD several times to submit this letter which again proves I didn't sign it and this is a huge mortgage fraud crime ring, and they will not return my call. I will get justice and I will not let anyone get away with what you have done to me and the peace I have been robbed of. So please I never ask of anything for myself, I just want justice for what they did to me while I should have only been able to grieve the loss of ayden. This is racial inequality, justice inequality, marriage inequality, and it needs to stop. I told Linda to cancel the sale, they continued while I went to a little girls funeral and then forged my name the next day when I thought I was going to review docs when in reality they already closed and never told me. This is mortgage fraud, conspiracy, and forgery why are they all still working?! [NRED LVMPD KTNV Channel 13 Action News 8 News Now BlackLivesMatter GMA News TV Governor Steve Sisolak Steve Sanson](#)



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Facebook © 2020

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 Grayson

Home

Create

STATEMENT RELEASE:
I've never had to write such a post like this but due to the seriousness of the accusations about me and my business floating around social media, I felt it appropriate to release this statement. Anyone who may have seen any false propaganda of me or my services please see below as I feel it necessary to clear the air with real truth and honesty (as much as I can post here).
A former customer of mine has been posting accusations about my services on social media and other web platforms. These accusations are very serious and libelous. They are no longer just someone writing lies and bad reviews. I have brought these posts, and the accusations within them, to the attention of my attorneys.
I maintain the highest level of professionalism with all my clients and have not violated any ethical standards or law. I'm am working on having this situation swiftly resolved, and to have the false accusations removed as soon as possible. At this time, I'm not associated with any "lawsuit" with office and signed ONE document and that is all!!
I am not involved in any lawsuit with you. I do not know Linda Nawi. I do not know your ex-husband!!!!
You have tried filing a complaint against me stating I forged your name!!!!
The Secretary of State notified me after your complaint, wherein I provided proof of YOUR identification and signature on my notary log of the document you signed and your complaint was dismissed!!!!
I am NOT associated with any "lawsuit" with have nor am I a member of the GLVAR. I closed the escrow of the home you live in. You have used my name several times on social media (all spelled incorrectly I might

+9

32


7 Comments 10 Shares

Like


Comment

Share

All Comments




Write a comment...



Author

Lindsey S LiCari Nevada State Council


Like · Reply · 1d



Author

Lindsey S LiCari Nevada Attorney General's Office


Like · Reply · 2d



Author

Lindsey S LiCari KTNV Channel 13 Action News


Like · Reply · 1d



Author

Lindsey S LiCari Barack Obama


Like · Reply · 1d



Author

Lindsey S LiCari BlackLivesMatter Saint Paul


Like · Reply · 1d



Author

Lindsey S LiCari LVMPD

Like · Reply · 1d



Nancy Joann Wilson

Oh my...sharing

Like · Reply · 11h

https://www.facebook.com/AydenBrownsMom/posts/10220278011454183?__tn__=K-R

2/2

Linda Naw, Las Vegas Real Estate Specialist- ERA Brokers Consolidated
December 13, 2018 at 8:00 AM · 🌐

STATEMENT RELEASE:

I've never had to write such a post like this but due to the seriousness of the accusations about me and my business floating around social media, I felt it appropriate to release this statement. Anyone who may have seen any false propaganda of me or my services please see below as I feel it necessary to clear the air with real truth and honesty (as much as I can post here).

A former customer of mine has been posting accusations about my services on social media and other web platforms. These accusations are very serious and libelous. They are no longer just someone writing lies and bad reviews. I have brought these posts, and the accusations within them, to the attention of my attorneys.

I maintain the highest level of professionalism with all my clients and have not violated any ethical standards or law. I'm am working on having this situation swiftly resolved, and to have the false accusations removed as soon as possible. At this time, it's not appropriate for me to say more about this unfortunate situation, but please know that these accusations are entirely false, and do not represent who I am.

My positive spin and advice to anyone that is going through something like this 😊

Tracy R. Bouchard
CEO

Tracy was raised in Las Vegas and graduated from Las Vegas High School. After high school Tracy was driven by his entrepreneurial spirit and immediately entered into the family business. Tracy has spent his entire

aydensarmyofangelsofficial • Follow
Las Vegas, Nevada

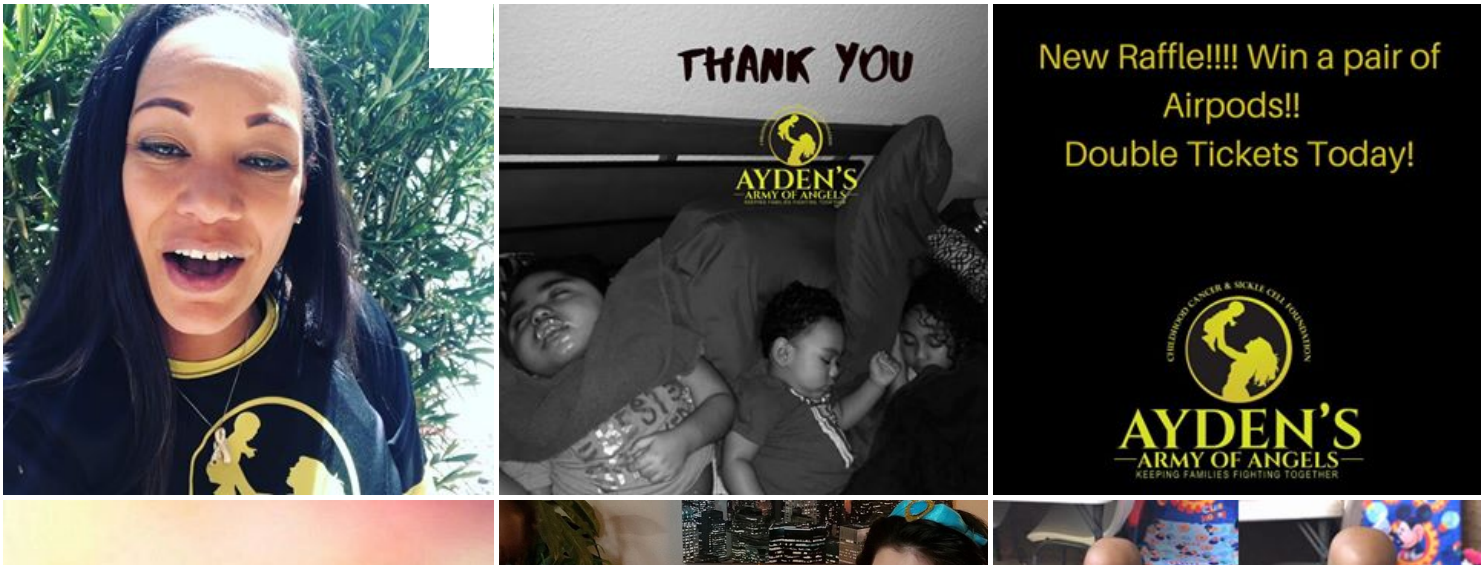
aydensarmyofangelsofficial
Share share share share share share:
I have gone through complete hell for 3 years, going from one nightmare to another. I married a man who's only purpose was to take everything I had and with the help of Linda naw perdue, National Title Company, Era Brokers, Valleywest mortgage, Nikki Bott, Bobby Antee, Glvar, NRED, he was able to almost do it and put me through 3 years of hell. Mocking my work, the death of my son, and the honesty of my heart. They have defamed me on

276 likes

3 DAYS AGO






Comments on this post have been limited.

More posts from aydensarmyofangelsofficial




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the rest of your life with me.
I smile because I know you loved me
till the day you went away,
and will keep loving me
till the day we're together again.

- Author Unknown -

 forever missed



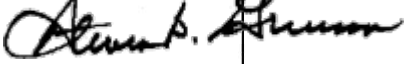


ABOUT HELP PRESS API JOBS PRIVACY TERMS

LOCATIONS TOP ACCOUNTS HASHTAGS LANGUAGE

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EXHIBIT 6



MOT
LINDSEY LICARI
(Your Name)
9564 SCORPION TRACK CT
(Your Address)
LAS VEGAS, NV 89178
(Your City, State, Zip)
702-577-6657
(Your Telephone)
LINDSEYLICARI14@AOL.COM
(Your E-mail Address/Your Fax)
☐ Plaintiff ☒ Defendant ☐ Other: _____
Self-Represented

EIGHTH JUDICIAL DISTRICT COURT
CLARK COUNTY, NEVADA

LINDA PERDUE also known as LINDA NAW, an individual;
NAW REAL ESTATE INC., a Nevada Corporation
Plaintiff(s),
vs.
LINDSEY LICARI also known as LINDSEY ANTEE, an individual;
DOES I through X, inclusive
Defendant(s).

Case No.: A-18-786141-C
Dept. No.: 17
HEARING REQUESTED


MOTION

COURT'S LEAVE TO FILE THIRD-PARTY COMPLAINT

(Insert Title of Motion)

(Check one box) ☐ Plaintiff ☒ Defendant ☐ Other: _____, *(insert your name)*
LINDSEY LICARI, an individual, self-represented, submits this motion based upon the following Memorandum of Points and Authorities; the pleadings and papers on file in this case; the attached exhibits hereto, if any; and the argument allowed by the Court at the time of hearing.

DATED: *(insert date)* JUNE 6, 2020.

(Your Signature) 
Self-Represented

MEMORANDUM OF POINTS AND AUTHORITIES

(Make your points and arguments below.)

On January 17, 2018 the Defendant, Lindsey Licari's name was forged to a Quit Claim Deed.

Defendant, Lindsey Licari, cancelled the purchase of the home located at 9564 Scorpion Track Ct in writing, with Plaintiff, Linda Naw. Plaintiff responded in writing she would cancel the purchase of the property, and did not. Plaintiff, Linda Naw, then proceeded with the purchase of the home with Plaintiff, Lindsey LiCari's ex-husband, Bobby Antee, paying off unauthorized debts to qualify him for the purchase. Plaintiff, Linda Naw, did not have gift letters for the debt that was paid off, nor did either of them have authorization to proceed with the sale. Plaintiff, Linda Naw breached the contract of our agreement, by continuing the purchase of the home and omitting Defendant, Lindsey Licari from ownership of the home.

\$98k was taken from Defendant, Lindsey Licari through the fraudulent purchase of the property located at 9564 Scorpion Track Ct. Las Vegas, NV 89178. To Close this sale, Linda Naw, Bobby Antee, Drew Levy, Valley West Mortgage, ERA Brokers, National Title Company, Nikki Sakalis Bott, withheld information from the Defendant, Lindsey Licari about debts being paid off with funds that were her

Sole and Separate Property to Qualify Bobby Antee for the home loan. (Exhibit 1) They did not obtain gift letters for the debt that was being paid off. To close on the loan, the Defendants name "Lindsey LiCai" was forged to a Quit Claim deed. When the Defendant, Lindsey Licari found out of the Forgery and Fraud, Plaintiff, Linda Naw began conspiring with Bobby Antee, NRED, GLVAR, SOS, National Title Company, to then conceal the crimes they committed. Defendant, Lindsey Licari was represented by counsel, in which she requested these parties be added to the counterclaim, in which they did not do.

I now have a Notarized Letter of Opinion from a Forensic Handwriting Expert (Exhibit 2) confirming that the Quit claim was forged.

Defendant, Lindsey Licari would ask for a COURT'S LEAVE TO FILE A THIRD- PARTY COMPLAINT now that she is representing herself.

☐ Check if continued on attached pages)

DATED: (insert date) **JUNE 6**, 20**20**.

(Signature)

Lindsey Licari
Self-Represented

CERTIFICATE OF SERVICE

Pursuant to Nev. R. Civ. P. 5(b), I HEREBY CERTIFY that on *(insert date of service)*

JUNE 6, 20**20**, I served a true and correct copy of the above **MOTION**
COURT'S LEAVE TO FILE THIRD-PARTY COMPLAINT
(insert name of motion)

by *(select which method of service you did):*

☒ Electronic service via the court's electronic filing system.

☐ Hand delivery at the following address *(insert name of opposing party's attorney, or opposing party if unrepresented, and the address where you delivered):*

☒ Mailing via United States Mail in the State of Nevada, postage prepaid, to the following address *(insert name of opposing party's attorney, or opposing party if unrepresented, and address where you mailed):*

GARRETT R. CHASE, ESQ/SHUMWAY VAN
8985 S. EASTERN AVE. STE 100
LAS VEGAS, NV 89123

DATED: *(insert date)* **JUNE 6**, 20**20**.

Name of Person Serving: _____

Signature of Person Serving: _____

EXHIBIT 7

SHUMWAY • VAN

Client: Bobby Dee Antee
Matter: Antee, Bobby adv. Licari, Lindsey

Overview	
Total Billings	\$ 33,022.00
Total Expenses	\$ 704.41
Total Combined	\$ 33,726.41

Billings					
User	Date	Amount	Hourly Rate	Total Time	Description
Grayson J. Moulton	6/5/2020	\$ 860.00	\$ 215.00	4	Finished drafting Motion for Attorney's Fees, and Declaration of GJM in Support of Motion.
Grayson J. Moulton	6/5/2020	\$ 5.50	\$ 55.00	0.1	Met with PL to discuss status of case and steps moving forward including upcoming hearings.
Grayson J. Moulton	6/4/2020	\$ 430.00	\$ 215.00	2	Began revisions to Motion to Attorney's Fees to address recent filings by Lindsey Antee.
Grayson J. Moulton	6/3/2020	\$ 11.00	\$ 55.00	0.2	Received and reviewed notice of hearing. Discussed status of case with GRC.
Grayson J. Moulton	6/2/2020	\$ 430.00	\$ 215.00	2	Received and reviewed Plaintiff's Motion for Stay of Execution of Divorce Order, Notice of Appeal, Case Appeal Statement, and Request for Transcript of Proceedings. Discussed the same with GRC. Reviewed case law and statutes concerning stays of execution.
Grayson J. Moulton	5/29/2020	\$ 430.00	\$ 215.00	2	Continued drafting Motion for Attorney's Fees and Costs and redacted billings.
Grayson J. Moulton	5/26/2020	\$ 537.50	\$ 215.00	2.5	Received and reviewed minute order from the court. Broke down the same. Emailed Bobby Antee a summary and discussed the same over the phone.
Grayson J. Moulton	5/26/2020	\$ 645.00	\$ 215.00	3	Began drafting Motion for Attorney's Fees and Costs.
Grayson J. Moulton	5/15/2020	\$ 11.00	\$ 55.00	0.2	Corresponded with the Department J Law Clerk concerning status and timeline for ruling.
Grayson J. Moulton	4/30/2020	\$ 11.00	\$ 55.00	0.2	Corresponded with Bobby Antee concerning counsel. Emailed the same to opposing counsel.
Grayson J. Moulton	4/22/2020	\$ 43.00	\$ 215.00	0.2	Corresponded with opposing counsel concerning status of HOA and Republic Services bills.
Grayson J. Moulton	4/17/2020	\$ 129.00	\$ 215.00	0.6	Corresponded with opposing counsel concerning mortgage payments, and HOA status. Corresponded with Department J law clerk concerning status of ruling.
Grayson J. Moulton	4/15/2020	\$ 11.00	\$ 55.00	0.2	Corresponded with Department J to discuss status of ruling.
Christina Garcia	4/9/2020	\$ 17.00	\$ 85.00	0.2	Received Legal Wings invoice R-1920453.01 for delivering the Trial Binders to Opposing Counsel, saved to file, prepared and submitted check request for payment.
Paula Lamprea	4/9/2020	\$ 34.00	\$ 85.00	0.4	Check request in the amount of \$74.00 payable to Legla Wings for Process service. Scanned and saved to the account.
Paula Lamprea	4/9/2020	\$ 34.00	\$ 85.00	0.4	Check Request in the amount of \$49.00, payable to Legal Wings for process service
Paula Lamprea	3/30/2020	\$ 17.00	\$ 85.00	0.2	Received and saved email correspondence from GJM to Peggy Lou from Dept G re. the Decree of Divorce.
Grayson J. Moulton	3/27/2020	\$ 11.00	\$ 55.00	0.2	Followed up with Court to inquire about status of case and timeline for receiving Decree of Divorce.
Paula Lamprea	3/10/2020	\$ 25.50	\$ 85.00	0.3	Check request in the amount of \$49.00 for process service provided by Legal Wings to serve Drew Dean Levy at the mortgage company. Sent request to accounting for processing.
Grayson J. Moulton	2/27/2020	\$ 43.00	\$ 215.00	0.2	Corresponded with Bobby Antee and Linda Naw concerning opposing counsel. Also corresponded with opposing counsel concerning contempt payment.
Grayson J. Moulton	2/12/2020	\$ 1,956.50	\$ 215.00	9.1	Prepared for and attended trial, Day 2.
Grayson J. Moulton	2/11/2020	\$ 709.50	\$ 215.00	3.3	Met with Bobby Antee and Linda Naw to review case and prepare for tomorrow's continued trial. Finalized changed questions for Lindsey, Linda, and Bobby.
Grayson J. Moulton	2/10/2020	\$ 451.50	\$ 215.00	2.1	Reviewed notes from trial and files pursuant to day 1 of trial. Prepared for Wednesday continued trial. Corresponded with opposing counsel concerning the same.
Grayson J. Moulton	2/7/2020	\$ 16.50	\$ 55.00	0.3	Spoke on the phone with Linda Perdue concerning testimony and closing disclosures.
Grayson J. Moulton	2/7/2020	\$ 1,290.00	\$ 215.00	6	Prepared for and attended trial.
Grayson J. Moulton	2/6/2020	\$ 66.00	\$ 55.00	1.2	Spoke on the phone with Bobby Antee about obtaining police report. Spoke on the phone with Detective Williams about her investigation. Spoke on the phone with counsel for Valley West Mortgage about testifying in hearing.
Grayson J. Moulton	2/6/2020	\$ 1,333.00	\$ 215.00	6.2	Finalized trial preparations. Met with Bobby Antee and Linda Perdue for witness prep. Completed questions, and finalized attack plan.
Grayson J. Moulton	2/5/2020	\$ 1,010.50	\$ 215.00	4.7	Continued trial preparation. Finalized questions for Linda Perdue and Bobby Antee. Corresponded with opposing counsel and held teleconference on settlement. Discussed the same with Bobby Antee.
Grayson J. Moulton	2/4/2020	\$ 688.00	\$ 215.00	3.2	Continued trial preparation. Corresponded and spoke on the phone with Detective Michelle Wilson concerning criminal charges filed by Lindsey Licari. Corresponded and spoke on the phone with Bobby Antee concerning police report and need to pick up report from Records Bureau. Corresponded with opposing counsel concerning police report and settlement possibilities.
Christina Garcia	1/30/2020	\$ 5.50	\$ 55.00	0.1	Received confirmation from the runner that the trial binders were delivered to the court and opposing counsel.
Grayson J. Moulton	1/29/2020	\$ 430.00	\$ 215.00	2	Held Pre-trial Teleconference with Opposing Counsel. Reviewed documentation and continued trial preparations.
Grayson J. Moulton	1/29/2020	\$ 64.50	\$ 215.00	0.3	Corresponded with opposing counsel concerning discovery responses. Provided him with the same.
Victoria Correa	1/28/2020	\$ -	\$ -	0.2	Received via fax: received Financial Disclosure form from Bobby Antee. Saved it to file and emailed GJM.
Alexis Duecker	1/28/2020	\$ 25.00	\$ 125.00	0.2	Meeting with GRC re:
Christina Garcia	1/28/2020	\$ 405.00	\$ 135.00	3	Prepared trial binders. Requested runner to deliver binders to the courthouse and opposing counsel.
Grayson J. Moulton	1/28/2020	\$ 1,440.50	\$ 215.00	6.7	Prepared, drafted, and filed Pre-trial Memorandum. Finalized trial binder.
Grayson J. Moulton	1/27/2020	\$ 1,096.50	\$ 215.00	5.1	Finalized and compiled all exhibits for trial. Received and reviewed Plaintiff's First Supplemental Disclosure of Documents and Witnesses. Spoke on the phone with Bobby Antee and opposing counsel concerning the status of the case.
Christina Garcia	1/24/2020	\$ 13.50	\$ 135.00	0.1	Telephone call with the Process Server with regard to the location of serving the West Valley Mortgage Trial Subpoena.
Margaret A. Manning	1/24/2020	\$ 37.50	\$ 125.00	0.3	Gathered and sent GJM emails and text messages regarding Mortgage lender and his requests for gift letters.
Victoria Correa	1/24/2020	\$ -	\$ -	0.1	Mailed letter with \$32.53 check to Person Most Knowledgeable at Valley West Mortgage. Saved it to file.
Karl A. Shelton	1/24/2020	\$ 60.00	\$ 300.00	0.2	Reviewed Opposition to Motion for Summary Judgment, met with GJM re: same.
Grayson J. Moulton	1/24/2020	\$ 1,118.00	\$ 215.00	5.2	Continued compiling documents for exhibits and drafting trial strategy. Conducted research on nature of funds in joint accounts.
Paula Lamprea	1/23/2020	\$ 16.50	\$ 55.00	0.3	Received the updated Trial/Evidentiary Hearing Subpoena to serve Valley West Mortgage, updated the chronological file and sent the new check request to Accounting and GJM for processing.
Paula Lamprea	1/23/2020	\$ 11.00	\$ 55.00	0.1	Corresponded to email from Legal Wings regarding service to Drew Dean Levy, updated them with the new service information.
Grayson J. Moulton	1/23/2020	\$ 903.00	\$ 215.00	4.2	Drafted and filed Opposition to Plaintiff's Motion for Partial Summary Judgment. Filed up with PL concerning Subpoena of Drew Levy. Modified Subpoena to go to Person Most Knowledgeable for Valley West Mortgage.
Grayson J. Moulton	1/22/2020	\$ 215.00	\$ 215.00	1	Began sorting documents into exhibits for trial.
Paula Lamprea	1/21/2020	\$ 59.50	\$ 85.00	0.7	Tasked by GJM, revised the Process/Runner Service for the Subpoena to serve Drew Dean Levy. Called Legal Wings to find status of serving process and printed the subpoena for GJM's signature. Scanned and saved to the file and emailed the same to Legal wings to update the current process request. Received confirmation from Legal Wings that they got the signed subpoena and they will get the same ready to be served. Notified GJM.
Myranda Matys	1/17/2020	\$ 57.50	\$ 115.00	0.5	Legal wings run ws created to serve the Trial Subpoena upon Drew Dead Levy. Saved a copy of the run sheet to the chronological file for future attorney reference. Calendared the deadline to with Withdraw for February 10, 2020.
Grayson J. Moulton	1/17/2020	\$ 43.00	\$ 215.00	0.2	Received and reviewed Offer of Judgment from Plaintiff. Discussed the same with Bobby Antee.
Myranda Matys	1/16/2020	\$ 23.00	\$ 115.00	0.2	Check Request was made in the amount of \$27.12 for Don Drew Levy for Witness fees. Filing fees have been sent to accounting for processing.
Grayson J. Moulton	1/16/2020	\$ 215.00	\$ 215.00	1	Drafted Subpoena of Drew Dean Levy for Trial. Directed MM to file the same. Spoke on the phone with Linda Perdue concerning trial. Reviewed documents related to Drew Levy. Directed MM to prepare check request for witness fees.

Myranda Matys	1/16/2020	\$ 34.50	\$ 115.00	0.3	Reviewed and saved the file stamped Order Shortening time on the Hearing for the Motion for Partial Summary Judgment. Updated calendar to reflect the new hearing date. Email correspondence to Bobby Antee with the Order Shortening Time and the Motion for Partial Summary Judgment enclosed.
Myranda Matys	1/15/2020	\$ 23.00	\$ 115.00	0.2	Served the Defendants Amended Response to Plaintiff's Interrogatories to opposing counsel through the Eighth Judicial District Court Family Division Odyssey Portal. Saved the e-served response to the chronological file in preparation for further discovery.
Grayson J. Moulton	1/15/2020	\$ 64.50	\$ 215.00	0.3	Spoke on the phone with opposing counsel concerning settlement discussions.
Paula Lamprea	1/14/2020	\$ 11.00	\$ 55.00	0.2	Telephone call with Bobby Antee
Grayson J. Moulton	1/10/2020	\$ 215.00	\$ 215.00	1	Reviewed case file and Plaintiff's Motion for Partial Summary Judgment. Discussed the same on the phone with Bobby Antee.
Myranda Matys	1/9/2020	\$ 23.00	\$ 115.00	0.2	Reviewed and saved the file stamped Plaintiff's Motion for Partial Summary Judgment and the Notice of Hearing to the chronological file in preparation for the hearing on the Motion for Partial Summary Judgment. Critical deadlines were calendared.
Grayson J. Moulton	1/8/2020	\$ 107.50	\$ 215.00	0.5	Received and reviewed Plaintiff's Motion for Partial Summary Judgment.
Grayson J. Moulton	1/6/2020	\$ 43.00	\$ 215.00	0.2	Corresponded with opposing counsel concerning settlement terms and discovery.
Grayson J. Moulton	1/3/2020	\$ 43.00	\$ 215.00	0.2	Received and responded to email corresponded from opposing counsel concerning settlement terms.
Grayson J. Moulton	12/11/2019	\$ 322.50	\$ 215.00	1.5	Held 2.34 Teleconference with opposing counsel to discuss lack of payment on mortgage, settlement discussions, and request to update interrogatories.
Grayson J. Moulton	12/10/2019	\$ 99.00	\$ 55.00	1.8	Corresponded with opposing counsel concerning teleconference and settlement. Discussed need to update interrogatory responses. Reviewed discovery responses for potential changes to make.
Grayson J. Moulton	12/9/2019	\$ 215.00	\$ 215.00	1	Sent opposing counsel an email containing updated settlement terms after discussion with Bobby Antee. Corresponded with opposing counsel about setting up a conference call to discuss the same.
Grayson J. Moulton	12/6/2019	\$ 258.00	\$ 215.00	1.2	Met with Bobby Antee and Linda Naw to discuss settlement, current status of case, and necessary preparations for trial.
Grayson J. Moulton	12/5/2019	\$ 43.00	\$ 215.00	0.2	Received correspondence from opposing counsel concerning settlement.
Grayson J. Moulton	12/4/2019	\$ 129.00	\$ 215.00	0.6	Corresponded with opposing counsel concerning settlement offers.
Myranda Matys	12/3/2019	\$ 15.00	\$ 75.00	0.2	Email correspondence to Mr. Antee . Discussed
Myranda Matys	12/2/2019	\$ 7.50	\$ 75.00	0.1	Discussed the status of matter and AR with GJM during our morning meeting. Updated the Master Service list in Odyssey.
Myranda Matys	11/27/2019	\$ 7.50	\$ 75.00	0.1	Email correspondence between GJM and opposing counsel with regards to a possible settlement agreement between the parties has been reviewed and saved to the chronological file.
Grayson J. Moulton	11/22/2019	\$ 22.00	\$ 55.00	0.4	Corresponded with Bobby Antee concerning . Corresponded with opposing counsel concerning the same.
Grayson J. Moulton	11/19/2019	\$ 11.00	\$ 55.00	0.2	Corresponded with Bobby Antee concerning status of case and need for payment.
Susan Ward	11/15/2019	\$ 38.50	\$ 55.00	0.7	Called Las Vegas Valley Water Company regarding the water shut off and bill at the marital residence, they negotiated the bill down due to not only the customers but their mistake as well, confirmed Lindsey can now pay the reduced balance and may start service in her name.
Susan Ward	11/15/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's Fourth Supplemental Disclosures Pursuant to NRCP 16.2 through the Court portal; saved service stamped copy to file.
Grayson J. Moulton	11/15/2019	\$ 66.00	\$ 55.00	1.2	Reviewed 4th Supplemental Disclosure of Documents and Witnesses for service. Continued correspondence with opposing counsel concerning the reinstatement of water at the Scorpion Court property.
Grayson J. Moulton	11/14/2019	\$ 44.00	\$ 55.00	0.8	Corresponded with opposing counsel concerning the water being shut off at the Scorpion Court property.
Grayson J. Moulton	11/13/2019	\$ 137.50	\$ 55.00	2.5	Conducted research concerning "compound interrogatories" and reviewed the same against our responses to discovery requests.
Susan Ward	11/12/2019	\$ 38.50	\$ 55.00	0.7	Finalized Defendant's Fourth Supplemental Disclosures adding new documents to disclosure; saved to file and printed for GJM to review and sign.
Susan Ward	11/12/2019	\$ 55.00	\$ 55.00	1	Organized client documents to ensure everything that was disclosed is in the right sub-folder, then put document to be added to the Fourth Supplemental Disclosures into the appropriate sub-folder and labeled documents accordingly to stay organized for trial.
Susan Ward	11/12/2019	\$ 27.50	\$ 55.00	0.5	Bates and redacted the final documents being disclosed in the Fourth Supplemental Disclosures.
Grayson J. Moulton	11/12/2019	\$ 16.50	\$ 55.00	0.3	Corresponded with opposing counsel concerning discovery disputes.
Susan Ward	11/8/2019	\$ 11.00	\$ 55.00	0.2	Legal Wings returned from the Court Notice of Entry of Order from Hearing on February 13, 2019; reviewed and scanned to file.
Victoria Correa	11/6/2019	\$ -	\$ -	0.2	Received via fax: 2017 IRS Tax Statement regarding Lindsey Antee. Saved it to file and emailed SW.
Susan Ward	11/1/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's Response to Plaintiff's Initial Interrogatories through the court; saved service stamped copy to file.
Grayson J. Moulton	11/1/2019	\$ 742.50	\$ 165.00	4.5	Drafted and finalized Responses to Interrogatories. Directed SW to file after receipt of Bobby's signature.
Susan Ward	10/31/2019	\$ 15.00	\$ 75.00	0.2	Drafted Defendant's Fourth Supplemental Disclosures; saved to file to add future documents.
Susan Ward	10/31/2019	\$ 5.50	\$ 55.00	0.1	Bates and redacted Wells Fargo payment history to attach to the Fourth Supplemental Disclosures.
Susan Ward	10/29/2019	\$ 176.00	\$ 55.00	3.2	Bates and redacted documents being produced in Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2 so the documents can correlate with answers in Defendant's Response to Plaintiff's First Set of Requests for Production of Documents; saved and labeled to file.
Susan Ward	10/29/2019	\$ 16.50	\$ 55.00	0.3	Finalized edits to Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2; saved to file and printed for signature.
Susan Ward	10/29/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2 and Defendant's Response to Plaintiff's First Set of Requests for Production of Documents through the Court; saved service stamped copy to file.
Susan Ward	10/29/2019	\$ 16.50	\$ 55.00	0.3	Burned Third Supplemental Documents to a disc for mailing to Opposing Counsel.
Susan Ward	10/29/2019	\$ 11.00	\$ 55.00	0.2	Prepared Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2 and disc of documents for mailing to Opposing Counsel for review; saved to file for tracking purposes.
Susan Ward	10/29/2019	\$ 15.00	\$ 75.00	0.2	Drafted Certificate of Service regarding Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2; saved to file and printed for signature.
Susan Ward	10/29/2019	\$ 11.00	\$ 55.00	0.2	Prepared and file/served Certificate of Service with the Court; saved file stamped copy to file and forwarded filing receipt to accounting for processing.
Grayson J. Moulton	10/29/2019	\$ 330.00	\$ 165.00	2	Finished drafting Responses to Requests for Production of Documents. Directed SW to serve the same upon opposing counsel.
Grayson J. Moulton	10/29/2019	\$ 55.00	\$ 55.00	1	Corresponded repeatedly with opposing counsel concerning payments made on the mortgage. Reviewed bank statements provided by opposing party.
Susan Ward	10/28/2019	\$ 11.00	\$ 55.00	0.2	Received emails from Bobby with
Susan Ward	10/28/2019	\$ 11.00	\$ 55.00	0.2	Drafted 3rd Supplemental Disclosure; saved to file.
Grayson J. Moulton	10/28/2019	\$ 775.50	\$ 165.00	4.7	Continued Drafting Responses to Requests for Production of Documents (61 Requests in Total). Reviewed and approved Third Supplemental Disclosure of Documents.
Susan Ward	10/21/2019	\$ 11.00	\$ 55.00	0.2	Received an email with the link to Lindsey's Facebook regarding her car being robbed; notified GJM of content and saved to file.
Susan Ward	10/21/2019	\$ 16.50	\$ 55.00	0.3	Received email from new counsel requesting documents from our Initial Disclosures; created a dropbox link and forwarded content to new counsel for his review.
Susan Ward	10/21/2019	\$ 5.50	\$ 55.00	0.1	Email Bobby to
Susan Ward	10/21/2019	\$ 5.50	\$ 55.00	0.1	Received email from Bobby with
Grayson J. Moulton	10/21/2019	\$ 82.50	\$ 55.00	1.5	Corresponded with opposing counsel concerning home insurance for a break-in to opposing party's car.
Grayson J. Moulton	10/21/2019	\$ 165.00	\$ 165.00	1	Drafted Responses to Requests for Production of Documents.

Darnell Lynch	10/18/2019	\$ 30.00	\$ 75.00	0.4	Prepared for electronic service defendant's First Set of Interrogatories to Defendant. Received served copies, saved all copies to file, calendared Lindsey's deadline to respond to same.
Susan Ward	10/18/2019	\$ 27.50	\$ 55.00	0.5	Reviewed and updated attorney information and some formatting on Defendant's First Set of Requests for Admissions to Plaintiff and Defendant's First Set of Interrogatories to Plaintiff; saved to file.
Grayson J. Moulton	10/18/2019	\$ 445.50	\$ 165.00	2.7	Drafted First Set of Interrogatories to Defendant.
Garrett R. Chase	10/17/2019	\$ 5.50	\$ 55.00	0.1	Discussed September 2018 Family Court hearing with GJM.
Susan Ward	10/17/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's First Supplemental Disclosures Pursuant to NRCP 16.2 through the Court; saved service stamped copy to file.
Susan Ward	10/17/2019	\$ 16.50	\$ 55.00	0.3	Received Carmax vehicle purchase agreement, student loan statements and auto loan statements from Bobby, saved them to file and labeled them to correlate with which response they belong to.
Grayson J. Moulton	10/17/2019	\$ 137.50	\$ 55.00	2.5	Reviewed documents for production and for use in Response to Request for Production and Interrogatories.
Darnell Lynch	10/16/2019	\$ 22.50	\$ 75.00	0.3	Finalized first supplemental list of witnesses and documents for GJM signature, electronically served same and saved file-stamped copy. Followed up with SW re draft on first supplement not finalized. Need to serve an amended supplement.
Susan Ward	10/16/2019	\$ 126.50	\$ 55.00	2.3	Received more emails from Bobby with reviewed and labeled to correlate to each response.
Susan Ward	10/16/2019	\$ 11.00	\$ 55.00	0.2	Emailled Bobby to request
Grayson J. Moulton	10/16/2019	\$ 16.50	\$ 55.00	0.3	Reviewed Second Supplemental Disclosures and directed DL to serve the same.
Darnell Lynch	10/15/2019	\$ 15.00	\$ 75.00	0.2	Continued saving and incorporating into file bates-stamped documents used for the 1st supplemental list of witnesses and documents. Organized plaintiff's and defendant's electronic discovery folders.
Darnell Lynch	10/15/2019	\$ -	\$ -	0.2	Met with GJM and discussed bates-stamped payments already disclosed, updated first supplemental list of witnesses and documents.
Darnell Lynch	10/14/2019	\$ 45.00	\$ 75.00	0.6	Prepared plaintiff's second supplemental disclosure of witnesses and document for GJM review. Bates-stamped Crescent valley association assessment statements for disclosure in same.
Susan Ward	10/14/2019	\$ 11.00	\$ 55.00	0.2	Prepared and file/served Defendant's Updated Financial Disclosures with the Court; saved file stamped copy to file and forwarded filing receipt to accounting for processing.
Susan Ward	10/14/2019	\$ 16.50	\$ 55.00	0.3	Emailled Bobby with more requests of documents to finalize the discovery responses due.
Susan Ward	10/14/2019	\$ 55.00	\$ 55.00	1	Continued reviewing, labeling and organizing client documents we had on file to attach to each response to the Request for Production.
Grayson J. Moulton	10/14/2019	\$ 33.00	\$ 55.00	0.6	Reviewed and approved Financial Disclosure Form for filing. Met with SW to review discovery requests and directed her to acquire necessary documents from Bobby Antee.
Darnell Lynch	10/11/2019	\$ 15.00	\$ 75.00	0.2	Reviewed case calendar per upcoming discovery deadline & e-mailed GJM, instructed to prepare initial disclosures using association statements per upcoming discovery deadline.
Susan Ward	10/10/2019	\$ 137.50	\$ 55.00	2.5	Received multiple emails with requested documents from Bobby; labeled and saved all documents by response number to client documents for adding to our responses to Request for Productions.
Susan Ward	10/10/2019	\$ 82.50	\$ 55.00	1.5	Started labeling and organizing client documents we already had to each response to the Request for Production.
Darnell Lynch	10/4/2019	\$ -	\$ -	0.1	Met with GJM re upcoming discovery deadline & he needs to send HOA statements to opposing counsel to show Bobby has been paying the assessments.
Susan Ward	10/3/2019	\$ 11.00	\$ 55.00	0.2	Reviewed correspondence from Bobby re: ; saved correspondence to file.
Darnell Lynch	10/3/2019	\$ 22.50	\$ 75.00	0.3	Received & incorporated into file accounting ledgers for 9564 Scorpion Track Ct. e-mailed from Yvette with Complete Association Management in response to GJM letter requesting statements. Saved e-mail correspondence to file.
Darnell Lynch	10/2/2019	\$ 22.50	\$ 75.00	0.3	Telephone call to Yvette with Complete association management to follow up on assessment statements for 9654 Scorpion Track Court, left voicemail, and sent e-mail correspondence to Yvette re same. Changed calendar entry re reminder for discovery cut-off to October 11 as discussed with GJM in calendar meeting.
Susan Ward	10/2/2019	\$ 120.00	\$ 75.00	1.6	Filled in Bobby's answers in the drafted Responses to Plaintiff's Initial Request for Production of Documents, researched documents he stated we have on file; saved to file for GJM to review and complete.
Susan Ward	10/2/2019	\$ 27.50	\$ 55.00	0.5	Emailled Bobby with Production questions we need documentation for and emailed him an updated Financial Disclosure Form for him to complete; saved correspondence to file.
Susan Ward	10/2/2019	\$ 11.00	\$ 55.00	0.2	Drafted updated Financial Disclosures; saved to file.
Grayson J. Moulton	10/2/2019	\$ 5.50	\$ 55.00	0.1	Received and responded to email from opposing counsel concerning insurance for Lindsey Licari.
Susan Ward	10/1/2019	\$ 97.50	\$ 75.00	1.3	Filled in Bobby's interrogatory answers in the drafted Responses to Plaintiff's Initial Interrogatories; saved to file for GJM to review and complete.
Darnell Lynch	9/30/2019	\$ -	\$ -	0.3	Met with GJM and discussed responses to discovery due in two weeks and MM handling, updated GJM case spreadsheet of status and matter deadlines.
Myranda Matys	9/27/2019	\$ 88.00	\$ 55.00	1.6	Meeting with Bobby Antee to go over
Susan Ward	9/25/2019	\$ 16.50	\$ 55.00	0.3	Drafted an instructional letter to Bobby re:
Susan Ward	9/25/2019	\$ 16.50	\$ 55.00	0.3	Prepared Discovery Requests and drafts of Responses and instructional letter for mailing, and emailing to Bobby for review and answering.
Grayson J. Moulton	9/25/2019	\$ 11.00	\$ 55.00	0.2	Corresponded with opposing counsel and with Bobby Antee concerning insurance problems.
Susan Ward	9/24/2019	\$ 112.50	\$ 75.00	1.5	Drafted Defendant's Responses to Plaintiff's Initial Request for Production of Documents; saved to file.
Susan Ward	9/24/2019	\$ 97.50	\$ 75.00	1.3	Drafted Defendant's Responses to Plaintiff's Initial Interrogatories; saved to file.
Myranda Matys	9/24/2019	\$ 16.50	\$ 55.00	0.3	Phone correspondence from Bobby Antee re: He needs clarity on the discovery requests that were sent to him. Set up an appointment for Friday September 27, 2019 at 1:30 pm to go over his discovery responses.
Grayson J. Moulton	9/24/2019	\$ 22.00	\$ 55.00	0.4	Corresponded with opposing counsel and with Bobby Antee to discuss the insurance issue and how to resolve the same.
Susan Ward	9/23/2019	\$ 11.00	\$ 55.00	0.2	Received served Plaintiff's Initial Request for Production of Documents to Defendant and Plaintiff's Initial Interrogatories to Defendant; reviewed and saved to file.
Grayson J. Moulton	9/23/2019	\$ 11.00	\$ 55.00	0.2	Received and responded to email from opposing counsel concerning insurance issues.
Grayson J. Moulton	9/20/2019	\$ 27.50	\$ 55.00	0.5	Received and reviewed Plaintiff's Interrogatories and Requests for Production of Documents. Directed SW to create shells and to send the same to Bobby Antee for review.
Darnell Lynch	9/19/2019	\$ 22.50	\$ 75.00	0.3	Telephone call to Yvette with Complete Association Management to follow up on request for statement for Crescent Valley HOA. Stated she doesn't have statements but will send me ledgers today, informed GJM of same.
Darnell Lynch	9/11/2019	\$ 45.00	\$ 75.00	0.6	Received and incorporated into file mailed plaintiff's initial disclosures of witnesses & documents pursuant to NRCP 16.2. Downloaded and saved CD of documents that accompanied same, e-mailed documents to GJM for review.
Darnell Lynch	9/11/2019	\$ -	\$ -	0.2	Telephone call to Yvette with complete association management re follow up on GJM letter requesting Crescent Valley Association assessment statements. She was not available.
Darnell Lynch	9/9/2019	\$ 45.00	\$ 75.00	0.6	Received and saved to file envelope of returned mail from Crescent Valley Association marked return to sender re GJM letter requesting statements. Telephone call to Crescent Valley Association, no answer. Performed business entity search on Nevada Secretary of state website. Telephone call to Susan with Complete Association Management Company (CAMCO) accounting department. Sent e-mail to CAMCO enclosing GJM's letter.
Darnell Lynch	9/9/2019	\$ -	\$ -	0.2	Telephone call to Complete Association Management Company to confirm receipt of my e-mail; informed GJM's letter forwarded to Yvette, supervisor. Left voicemail for Yvette re request for statements.
Darnell Lynch	9/6/2019	\$ -	\$ -	0.9	Prepared shell of Motion to Compel discovery response, finalized declaration of GJM, & prepared exhibits. Received and incorporated into file e-mail correspondence to opposing counsel re utility payments; calendared deadline for Lindsey to pay Bobby Republic Services balance.
Alexis Duecker	9/6/2019	\$ -	\$ -	1.2	Prepared a draft of a Motion to Compel Discovery due to Plaintiff's failure to produce any required disclosures by the extended deadline of September 3, 2019.
Grayson J. Moulton	9/6/2019	\$ -	\$ -	0.5	Reviewed Motion to Compel. Received and reviewed Disclosure of Documents and Responses to Discovery sent by opposing party.

Darnell Lynch	9/5/2019	\$ 45.00	\$ 75.00	0.6	Received and incorporated into file mailed Republic services statements & notice of intent to lien, sent to GJM, telephone call to Republic services re final payoff amount, saved e-mails from to client re need to pay lien & to opposing counsel re motion to compel in lieu of timely discovery response deadline.
Grayson J. Moulton	9/5/2019	\$ 66.00	\$ 55.00	1.2	Corresponded with opposing counsel concerning production of documents and payments of utilities. Reviewed statements from Republic Services. Discussed the same with Bobby Antee.
Darnell Lynch	9/4/2019	\$ -	\$ -	0.6	Received and saved into file text messages to Bobby Antee re Republic Services will mail us trash services statements & authority to access account. E-mailed GJM & informed him of same. Telephone call to Crescent Valley Association to follow up on fax re request for assessment statements. No answer, left voicemail.
Darnell Lynch	9/4/2019	\$ -	\$ -	0.5	Telephone call to representative at Las Vegas valley water district to obtain water bill statements, was told Mr. Antee was not on the account for the property at 9564 Scorpion Track Court. Informed GJM re same.
Alexis Duecker	9/4/2019	\$ 12.50	\$ 125.00	0.1	Meeting with GRM re: preparing Motion to Compel re: the lack of initial disclosures and no additional discovery being produced within extended deadline.
Grayson J. Moulton	9/4/2019	\$ 11.00	\$ 55.00	0.2	Met with AD to discuss case strategy and assign Motion to Compel Discovery.
Darnell Lynch	9/4/2019	\$ -	\$ -	0.1	Telephone call to Crescent Valley Association re follow up on fax re request for statements. No answer, left voicemail.
Darnell Lynch	9/3/2019	\$ 67.50	\$ 75.00	0.9	Re-faxed GJM's letter to Crescent Valley Association requesting homeowner's association statements following multiple unsuccessful fax results. Telephone calls to Crescent Valley Association, Las Vegas valley water district, long hold time, will try back. Consulted with GJM, telephone calls to Republic Services Lien department & Bobby Antee re: send SV statements. Requested PL send Bobby text message re: same. Response to client re: statement being mailed.
Paula Lamprea	9/3/2019	\$ -	\$ -	0.2	Corresponded to DL's email; Sent via Text Message Republic Services Lien Department information to Bobby Antee at (702) 578-5372 per DL.
Grayson J. Moulton	9/3/2019	\$ 16.50	\$ 55.00	0.3	Corresponded with opposing counsel confirming payment of mortgage.
Darnell Lynch	8/30/2019	\$ 60.00	\$ 75.00	0.8	Prepared letter to Crescent Valley Association requesting assessment statements for the purpose of producing same in re community debts, faxed & mailed letter to the association. Sent multiple faxes as they were returned deliverable. Telephone calls to Crescent Valley association, no answer, left voicemail.
Grayson J. Moulton	8/29/2019	\$ 16.50	\$ 55.00	0.3	Received and reviewed email received from Bobby Antee containing new social media posts by Lindsey Antee. Emailed opposing counsel to relay the information and request such posts cease.
Darnell Lynch	8/28/2019	\$ -	\$ -	0.2	Discussed with GJM outcome of NRS 2.34 telephonic conference; instructed to obtain homeowner's association dues, water and trash statements from each entity for the purposes of producing said statements in discovery.
Susan Ward	8/28/2019	\$ 45.00	\$ 75.00	0.6	Drafted Defendant's First Supplemental Disclosures added new financial documents to table with bates range; saved to file and printed for review and signature.
Susan Ward	8/28/2019	\$ 55.00	\$ 55.00	1	Bates labeled and redacted and organized new financial documents to correlate with previously disclosed documents; to add to Defendant's First Supplemental Disclosure.
Grayson J. Moulton	8/28/2019	\$ 44.00	\$ 55.00	0.8	Received and responded to settlement offer from opposing counsel. Discussed the same with GRC and SW.
Grayson J. Moulton	8/27/2019	\$ 55.00	\$ 55.00	1	Received and reviewed documents from Bobby Antee concerning payments made for utilities.
Grayson J. Moulton	8/27/2019	\$ 165.00	\$ 165.00	1	Held 2.34 Meet and Confer Teleconference with opposing counsel about when documents would be produced. Informed him that he would have until September 3 to produce all documents.
Grayson J. Moulton	8/23/2019	\$ 38.50	\$ 55.00	0.7	Corresponded with and spoke over the phone with Bobby Antee concerning . Bobby committed to provide
Grayson J. Moulton	8/22/2019	\$ 44.00	\$ 55.00	0.8	Corresponded with Bobby Antee and opposing counsel concerning status of payment on marital home.
Grayson J. Moulton	8/20/2019	\$ 27.50	\$ 55.00	0.5	Corresponded with Bobby Antee concerning
Susan Ward	8/16/2019	\$ 11.00	\$ 55.00	0.2	Saved correspondence re: reviewing Order proposed by opposing counsel and scheduling a 2.34 telephonic conference; calendared conference.
Grayson J. Moulton	8/16/2019	\$ 132.00	\$ 165.00	0.8	Corresponded with opposing counsel concerning lack of documents pursuant to EDCR 2.34. Scheduled meet and confer for August 27.
Grayson J. Moulton	8/15/2019	\$ 16.50	\$ 55.00	0.3	Corresponded with opposing counsel concerning payment of bills on property.
Grayson J. Moulton	8/14/2019	\$ 11.00	\$ 55.00	0.2	Correspondence with the Court concerning Order from February hearing.
Margaret A. Manning	8/7/2019	\$ 5.50	\$ 55.00	0.1	Met with GRC and discussed discovery requests and need for review.
Darnell Lynch	7/25/2019	\$ -	\$ -	0.4	Reviewed the electronically filed Amended Case Management Order and calendared discovery and trial deadlines and reminders not already calendared. Updated GJM case list with deadlines.
Grayson J. Moulton	7/25/2019	\$ 11.00	\$ 55.00	0.2	Received and reviewed email from Bobby Antee containing
Darnell Lynch	7/23/2019	\$ 7.50	\$ 75.00	0.1	Met with GJM and instructed to calendar reminder re: contact new opposing counsel re respond to request for production or we will file a motion to compel.
Darnell Lynch	7/22/2019	\$ 37.50	\$ 75.00	0.5	Met with GJM re review scheduling order for extended trial and discovery dates; reviewed discovery in the file to determine what documents have been produced by plaintiff so far.
Susan Ward	7/8/2019	\$ 11.00	\$ 55.00	0.2	Received Order Granting Mr. Tilman's Motion to Withdraw as attorney of record; saved to file.
Grayson J. Moulton	7/8/2019	\$ 11.00	\$ 55.00	0.2	Received and reviewed Order Granting Motion to Withdraw as Counsel.
Susan Ward	6/24/2019	\$ 11.00	\$ 55.00	0.2	Received mail from the Court regarding Minutes from the Motion to Withdraw hearing; saved to file.
Susan Ward	6/18/2019	\$ -	\$ -	0.2	Discussed Plaintiffs Motion to withdraw hearing in calendar meeting.
Susan Ward	6/17/2019	\$ 27.50	\$ 55.00	0.5	Received return run with Amended Case Management Order from the Court; saved to file and delivered to GJM for review and calendared any changes.
Grayson J. Moulton	6/17/2019	\$ 11.00	\$ 55.00	0.2	Received and reviewed new scheduling order from the court.
Susan Ward	6/12/2019	\$ 11.00	\$ 55.00	0.2	Received Notice of Entry of Stipulation and Order to Extend Discovery Deadlines and Trial Date; saved to file and calendared changes.
Susan Ward	6/11/2019	\$ 11.00	\$ 55.00	0.2	Received filed copy of Stipulation and Order To Extend Discovery Deadlines and Trial Date; saved to file and calendared new deadlines and Trial.
Sandi Leitner	6/6/2019	\$ -	\$ -	0.1	Discussed in calendar meeting.
Sandi Leitner	5/31/2019	\$ 16.50	\$ 55.00	0.3	Received Stipulation and Order to Extend Discovery Deadlines and Trial Date from GJM; scanned and saved to pleadings file; prepared envelope to mail to opposing counsel; scanned and saved to correspondence file.
Sandi Leitner	5/28/2019	\$ 27.00	\$ 135.00	0.2	Filed Defendant's Offer of Judgment in Odyssey; scanned and saved to pleadings file.
Sandi Leitner	5/28/2019	\$ 5.50	\$ 55.00	0.1	Received served copy of Defendant's Offer of Judgment; saved to pleadings file.
Grayson J. Moulton	5/27/2019	\$ 82.50	\$ 165.00	0.5	Drafted Offer of Judgment and directed SL to serve the same.
Sandi Leitner	5/24/2019	\$ 5.50	\$ 55.00	0.1	Received email between Bobby Antee and GJM about settling; saved to correspondence file.
Grayson J. Moulton	5/22/2019	\$ 11.00	\$ 55.00	0.2	Received and responded to email from Bobby Antee concerning updates to case.
Sandi Leitner	5/20/2019	\$ 5.50	\$ 55.00	0.1	Received email from GJM to Bobby regarding ; saved to correspondence file.
Grayson J. Moulton	5/17/2019	\$ 38.50	\$ 55.00	0.7	Spoke with opposing counsel concerning status of the case, need to pay bills, and to refrain from publishing e-books. Discussed potential for settlement.
Grayson J. Moulton	5/17/2019	\$ 27.50	\$ 55.00	0.5	Sent email to Bobby Antee concerning
Paula Lamprea	5/13/2019	\$ -	\$ -	0.1	Telephone call to Bobby Antee with regard to
Paula Lamprea	5/13/2019	\$ -	\$ -	0.3	Follow up call with Bobby Antee regarding payment on his account and the upcoming work: Motion to Compel discovery, preparation for trial and trial date. Sent him follow up email with the iQualify link and calendar a call for Friday May 17th regarding the same. Notified GJM and SL.
Grayson J. Moulton	5/13/2019	\$ 16.50	\$ 55.00	0.3	Spoke with PL concerning payment status for Bobby Antee.
Sandi Leitner	5/8/2019	\$ 5.50	\$ 55.00	0.1	Received Substitution of Attorney from Court; saved to pleadings file.
Sandi Leitner	5/8/2019	\$ -	\$ -	0.1	Discussed case in AR meeting.
Grayson J. Moulton	5/8/2019	\$ -	\$ -	0.2	Received and reviewed Substitution of Attorney.
Sandi Leitner	5/6/2019	\$ 11.00	\$ 55.00	0.2	Received Certificate of Mailing of the Motion to Withdraw as Attorney of Record from opposing counsel; scanned and saved to correspondence file.
Sandi Leitner	5/3/2019	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of the Certificate of Mailing from opposing counsel; saved to pleadings file.
Sandi Leitner	5/2/2019	\$ 40.50	\$ 135.00	0.3	Prepared Notice of Non-Opposition to Opposing Counsel's Motion to Withdraw as Attorney of Record; saved to projects file.

Sandi Leitner	5/2/2019	\$ 11.00	\$ 55.00	0.2	Had GJM sign the Notice of Non-Opposition to Opposing Counsel's Motion to Withdraw; scanned and saved to pleadings file.
Sandi Leitner	5/2/2019	\$ 27.00	\$ 135.00	0.2	Filed the Notice of Non-Opposition to Opposing Counsel's Motion to Withdraw as Attorney of Record in Odyssey.
Sandi Leitner	5/2/2019	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of the Notice of Non-Opposition to Opposing Counsel's Motion to Withdraw; saved to pleadings file.
Sandi Leitner	5/2/2019	\$ 5.50	\$ 55.00	0.1	Received Motion to Withdraw as Attorney of Record from Court; saved to pleadings file.
Sandi Leitner	5/2/2019	\$ 11.00	\$ 55.00	0.2	Received Notice of Hearing from Court; saved to pleadings file and updated calendar.
Grayson J. Moulton	5/2/2019	\$ 27.50	\$ 55.00	0.5	Received and reviewed opposing counsel's Motion to Withdraw. Directed SL to draft Notice of Non-Opposition, and reviewed the same.
Sandi Leitner	5/1/2019	\$ 5.50	\$ 55.00	0.1	Received email from GJM to opposing counsel; saved to correspondence file.
Sandi Leitner	5/1/2019	\$ 5.50	\$ 55.00	0.1	Received email from GJM to Bobby regarding payment and status; saved to correspondence file.
Grayson J. Moulton	5/1/2019	\$ 16.50	\$ 55.00	0.3	Emailled opposing counsel requesting production of documents and publishing of e-book. Emailled Bobby Antee to discuss status of case and request payment.
Sandi Leitner	4/25/2019	\$ -	\$ -	0.1	Emailled phone number for Bobby and opposing counsel to GJM.
Sandi Leitner	4/24/2019	\$ -	\$ -	0.1	Discussed with GJM.
Sandi Leitner	4/19/2019	\$ -	\$ -	0.1	Reviewed for next step.
Sandi Leitner	4/15/2019	\$ -	\$ -	0.1	Discussed in AR meeting.
Myranda Matys	4/12/2019	\$ -	\$ -	0.1	Phone correspondence to the client re: April client relation call.
Myranda Matys	4/10/2019	\$ -	\$ -	0.1	Met with GJM for the status of the case.
Myranda Matys	4/3/2019	\$ -	\$ -	0.1	Reviewed clients AR, reviewed April invoice, checked the calendar for any upcoming events or deadlines
Sandi Leitner	3/26/2019	\$ 11.00	\$ 55.00	0.2	Received Junes run sheet back with the signed Stipulation and Order; scanned and saved to cost file; updated calendar.
Sandi Leitner	3/26/2019	\$ 54.00	\$ 135.00	0.4	Filed the Stipulation and Order in Family Court. Prepared Notice of Entry of Order; saved to projects file.
Sandi Leitner	3/26/2019	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of the Stipulation and Order to Continue Trial; saved to pleadings file; attached to Notice of Entry of Order.
Sandi Leitner	3/26/2019	\$ 11.00	\$ 55.00	0.2	Had GJM sign the Stipulation and Order to Continue Trial; scanned and saved to pleadings file.
Sandi Leitner	3/26/2019	\$ 27.00	\$ 135.00	0.2	Filed the Stipulation and Order to Continue Trial in Family Court.
Sandi Leitner	3/26/2019	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of the Notice of Entry of Order from Court; saved to pleadings file.
Sandi Leitner	3/22/2019	\$ 5.50	\$ 55.00	0.1	Discussed settlement offer and talked about the documents from the mortgage company.
Sandi Leitner	3/22/2019	\$ 11.00	\$ 55.00	0.2	Spoke with Bobby regarding ; advised GJM.
Sandi Leitner	3/21/2019	\$ 11.00	\$ 55.00	0.2	Received signed copy of the Stipulation and Order from opposing counsel; scanned and saved to pleadings file.
Sandi Leitner	3/20/2019	\$ 11.00	\$ 55.00	0.2	Received letter from Court advising opposing counsel has not filed the Order from the February 13th hearing; scanned and saved to file.
Sandi Leitner	3/20/2019	\$ 11.00	\$ 55.00	0.2	Received a call from Bobby about ; emailed GJM.
Sandi Leitner	3/18/2019	\$ 11.00	\$ 55.00	0.2	Received email with Stipulation and Order signed by opposing counsel; saved to correspondence file.
Sandi Leitner	3/18/2019	\$ 27.00	\$ 135.00	0.2	Ordered Junes runner to deliver the Stipulation and Order to Continue Trial to the Judge for signature.
Sandi Leitner	3/18/2019	\$ 5.50	\$ 55.00	0.1	Scanned and saved the Junes order to deliver the Stipulation and Order to Continue Trial to the Judge to cost file.
Michael Van	3/15/2019	\$ 135.00	\$ 450.00	0.3	Reviewed and forwarded the executed Stipulation to Continue Trial.
Sandi Leitner	3/14/2019	\$ 54.00	\$ 135.00	0.4	Prepared Stipulation and Order to Continue Trial; saved to projects file; emailed to GJM.
Sandi Leitner	3/12/2019	\$ 5.50	\$ 55.00	0.1	Received emails between GJM and opposing counsel regarding continuing trial date; saved to correspondence file.
Grayson J. Moulton	3/11/2019	\$ 44.00	\$ 55.00	0.8	Drafted email to send to opposing counsel requesting continuance of trial date and the setting of an EDCR 2.34 conference.
Sandi Leitner	3/7/2019	\$ 5.50	\$ 55.00	0.1	Spoke with Bobby Antee about
Sandi Leitner	3/6/2019	\$ 11.00	\$ 55.00	0.2	Received served copy of Defendant's Initial List of Witnesses and Production of Documents from Court; saved to file.
Sandi Leitner	3/6/2019	\$ 270.00	\$ 135.00	2	Left message at Valley West for Robin - we have not received the documents yet. Spoke with Robin - she advised the documents will be here today.
Sandi Leitner	3/6/2019	\$ 40.50	\$ 135.00	0.3	Bates Stamped and redacted the documents from Valley West; saved to file.
Sandi Leitner	3/6/2019	\$ 135.00	\$ 135.00	1	Added witnesses and Valley West documents to the Initial Disclosures; saved to projects file.
Sandi Leitner	3/6/2019	\$ 135.00	\$ 135.00	1	Addressed all issues on the Initial Disclosures; prepared all documents to serve in Court; served Defendant's Initial List of Witnesses and Production of Documents pursuant to NRCP 16.2 in Court.
Grayson J. Moulton	3/6/2019	\$ 478.50	\$ 165.00	2.9	Reviewed all documents received from Valley West Mortgage as well as documents for disclosure. Reviewed Initial Disclosure of Documents and Witnesses.
Sandi Leitner	3/5/2019	\$ 310.50	\$ 135.00	2.3	Bates stamped the documents for the Initial Disclosures; prepared Defendant's Initial List of Witnesses and Production of Documents Pursuant to NRCP 16.2; saved to projects file.
Grayson J. Moulton	3/5/2019	\$ 11.00	\$ 55.00	0.2	Spoke on the phone with Valley West Mortgage to confirm the receipt of documents from their office.
Sandi Leitner	3/4/2019	\$ 337.50	\$ 135.00	2.5	Redacted client documents for the Initial Disclosures.
Sandi Leitner	3/1/2019	\$ 16.50	\$ 55.00	0.3	Received letter to Valley West Mortgage from GJM; scanned and saved to correspondence file; emailed letter to Valley West; scanned and saved to file.
Sandi Leitner	3/1/2019	\$ 16.50	\$ 55.00	0.3	Received emails from GJM with various text messages between Bobby and Lindsey; saved to client documents file.
Sandi Leitner	2/28/2019	\$ 54.00	\$ 135.00	0.4	Prepared letter to Wells Fargo asking for Release of the File; saved to projects file; gave to GJM.
Grayson J. Moulton	2/28/2019	\$ 44.00	\$ 55.00	0.8	Reviewed documents and text messages provided by Bobby Antee. Spoke on the phone with loan originator at West Valley Mortgage concerning documents related to the mortgage on the property.
Grayson J. Moulton	2/28/2019	\$ 181.50	\$ 165.00	1.1	Drafted letter authorizing release of documents by West Valley Mortgage and a Declaration supporting the same.
Paula Lamprea	2/26/2019	\$ -	\$ -	0.5	Sent follow up email to Bobby Antee after attempts to call him
Sandi Leitner	2/26/2019	\$ 5.50	\$ 55.00	0.1	Received email from PL to Bobby regarding payment; saved to correspondence file.
Grayson J. Moulton	2/26/2019	\$ 22.00	\$ 55.00	0.4	Corresponded with Bobby Antee concerning
Sandi Leitner	2/25/2019	\$ 5.50	\$ 55.00	0.1	Received emails between GJM and Bobby regarding the taxes, trial and payment; saved to correspondence file.
Sandi Leitner	2/25/2019	\$ 11.00	\$ 55.00	0.2	Received Plaintiff's Pretrial Memorandum from opposing counsel; scanned and saved to pleadings file; advised GJM.
Victoria Correa	2/22/2019	\$ -	\$ -	0.2	Processed check request in the amount of \$78.00 for invoice number EP148122 for runner service for a rush on Request for Production of Documents. Saved to file and emailed Accounting and PL.
Sandi Leitner	2/21/2019	\$ -	\$ -	0.1	Received Junes invoice for serving opposing counsel from VC; reviewed and advised her it is ok to pay.
Grayson J. Moulton	2/21/2019	\$ 16.50	\$ 55.00	0.3	Received and responded to email from Bobby Antee concerning taxes. Requested payment be made.
Sandi Leitner	2/15/2019	\$ 5.50	\$ 55.00	0.1	Received health insurance documents from Bobby; scanned and saved to client documents file.
Grayson J. Moulton	2/13/2019	\$ 82.50	\$ 55.00	1.5	Prepared for and attended hearing on Motion to Dismiss.
Christina Garcia	2/8/2019	\$ -	\$ -	0.1	Met with GJM and MCV re: case status.
Michael Van	2/8/2019	\$ -	\$ -	0.1	Meeting with GJM re: case status.
Sandi Leitner	2/8/2019	\$ 5.50	\$ 55.00	0.1	Received Affidavit of Service from Junes; saved to pleadings file.
Sandi Leitner	2/8/2019	\$ 27.00	\$ 135.00	0.2	Filed Affidavit of Service in Court.
Sandi Leitner	2/8/2019	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of Affidavit of Service; saved to pleadings file.
Sandi Leitner	2/6/2019	\$ 54.00	\$ 135.00	0.4	Prepared Certificate of Service of Defendant's Motion to Dismiss or in the Alternative Motion to Consolidate; filed in Family Court.
Sandi Leitner	2/6/2019	\$ 5.50	\$ 55.00	0.1	Scanned and saved the Certificate of Service of Defendant's Motion to Dismiss or in the Alternative to Consolidate to pleading file.
Sandi Leitner	2/6/2019	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of the Certificate of Service for Motion to Dismiss; saved to pleadings file.
Sandi Leitner	2/6/2019	\$ 22.00	\$ 55.00	0.4	Received Plaintiff's First Request for Production of Documents to Defendant from GJM; scanned and saved to pleadings file; ordered Junes process server to deliver to opposing counsel today; scanned to cost file.
Sandi Leitner	2/6/2019	\$ 11.00	\$ 55.00	0.2	Spoke with Junes Legal to confirm the Request for Production of Documents was served to opposing counsel; advised GJM.
Grayson J. Moulton	2/6/2019	\$ 11.00	\$ 55.00	0.2	Reviewed status of case to confirm documents were served to opposing party.
Sandi Leitner	2/5/2019	\$ 5.50	\$ 55.00	0.1	Received emails between GJM and opposing counsel about Attorney Fees; saved to correspondence file.
Sandi Leitner	2/5/2019	\$ 16.50	\$ 55.00	0.3	Received fax from Bobby with more documents for the case; saved to client documents file.

Myranda Matys	2/5/2019	\$ 11.00	\$ 55.00	0.2	Received medical invoice via fax from Bobby Antee.
Grayson J. Moulton	2/5/2019	\$ 181.50	\$ 165.00	1.1	Drafted and completed request for production of documents. Directed SL to have served.
Sandi Leitner	2/4/2019	\$ 99.00	\$ 55.00	1.8	Received email with client documents from GJM; saved all documents to client documents file.
Sandi Leitner	1/30/2019	\$ 216.00	\$ 135.00	1.6	Prepared Requests for Admissions, Request for Production of Documents and Request for Interrogatories; saved to projects file.
Myranda Matys	1/29/2019	\$ 11.00	\$ 55.00	0.2	Received via Fax letter from Christopher R. Tilman Esq. Saved the fax into the clients file. Emailed the fax to SL and CG.
Sandi Leitner	1/29/2019	\$ 5.50	\$ 55.00	0.1	Received fax from opposing counsel RE: motion filed; saved to correspondence file; gave to GJM.
Grayson J. Moulton	1/29/2019	\$ 11.00	\$ 55.00	0.2	Received and reviewed letter from opposing counsel concerning a proposed stipulation to withdraw.
Sandi Leitner	1/28/2019	\$ 5.50	\$ 55.00	0.1	Received email from Bobby advising ; saved to correspondence file.
Sandi Leitner	1/28/2019	\$ 11.00	\$ 55.00	0.2	Received Case Management Order; scanned and saved to pleadings file.
Sandi Leitner	1/28/2019	\$ 22.00	\$ 55.00	0.4	Updated calendar with the dates from the Case Management Order.
Sandi Leitner	1/28/2019	\$ -	\$ -	0.2	Met with GJM to discuss next step.
Myranda Matys	1/25/2019	\$ 11.00	\$ 55.00	0.2	Received via fax notice of delinquency from Bobby. Emailed a copy over to SL. Saved a copy into the clients file.
Sandi Leitner	1/25/2019	\$ 16.50	\$ 55.00	0.3	Received letter to opposing counsel from GJM; scanned to correspondence file; emailed and faxed to opposing counsel.
Sandi Leitner	1/25/2019	\$ 16.50	\$ 55.00	0.3	Emailed Bobby to send us documents needed for disclosure; also left him a voicemail.
Sandi Leitner	1/25/2019	\$ -	\$ -	0.1	Received fax from Bobby; emailed to GJM.
Grayson J. Moulton	1/24/2019	\$ 16.50	\$ 55.00	0.3	Spoke on the phone with Bobby Antee and emailed him concerning
Grayson J. Moulton	1/24/2019	\$ 247.50	\$ 165.00	1.5	Reviewed status of case, and began drafting Settlement Letter to opposing counsel.
Christina Garcia	1/17/2019	\$ 5.50	\$ 55.00	0.1	Met with GJM and MCV re: status of case.
Grayson J. Moulton	1/17/2019	\$ 16.50	\$ 55.00	0.3	Held case strategy meeting with MCV.
Christina Garcia	1/16/2019	\$ 11.00	\$ 55.00	0.2	Reviewed docket. Calendared hearing on Defendant's Motion To Dismiss Or In The Alternative Motion To Consolidate for February 13, 219 at 10:00 am.
Christina Garcia	1/16/2019	\$ 11.00	\$ 55.00	0.2	Reviewed docket. Calendared hearing on Defendant's Motion To Dismiss Or In The Alternative Motion To Consolidate for February 13, 2019 at 10:00 am.
Sandi Leitner	1/16/2019	\$ -	\$ -	0.1	Reviewed case for status; added to list for CG.
Sandi Leitner	1/15/2019	\$ 11.00	\$ 55.00	0.2	Received signed certified mail receipt back; scanned and saved to correspondence file; advised GJM.
Sandi Leitner	1/11/2019	\$ -	\$ -	0.2	Received filed, stamped copy of Motion/Opposition Fee Information Sheet and Defendant's Motion to Dismiss or in the Alternative Motion to Consolidate; saved to pleadings file.
Sandi Leitner	1/11/2019	\$ 16.50	\$ 55.00	0.3	Prepared envelope to mail Defendant's Motion to Dismiss or in the Alternative Motion to Consolidate; saved to correspondence file.
Sandi Leitner	1/10/2019	\$ 22.00	\$ 55.00	0.4	Received Motion to Dismiss from GJM; prepared Family Court Motion/Opposition Fee Information Sheet; scanned and saved both to pleadings file; filed Motion to Dismiss and Motion/Opposition Fee Information Sheet in Court.
Sandi Leitner	1/9/2019	\$ 40.50	\$ 135.00	0.3	Added social media to the preservation of evidence letter; had GJM sign; scanned and saved to file; filed in Family Court.
Sandi Leitner	1/9/2019	\$ 16.50	\$ 55.00	0.3	Prepared envelopes to Lindsay for certified mail and to Christopher Tilman , Esq. for regular mail; scanned and saved to correspondence file.
Grayson J. Moulton	1/9/2019	\$ 11.00	\$ 55.00	0.2	Directed SL to send opposing party an Electronic Preservation Letter.
Grayson J. Moulton	1/9/2019	\$ 181.50	\$ 165.00	1.1	Finalized Motion to Dismiss or in the Alternative to Consolidate.
Sandi Leitner	1/8/2019	\$ 16.50	\$ 55.00	0.3	Received Joint Preliminary Injunction from GJM; scanned and saved to pleadings file; filed in Family Court.
Sandi Leitner	1/8/2019	\$ -	\$ -	0.1	Received filed, stamped copy of the Joint Preliminary Injunction; saved to pleadings file.
Grayson J. Moulton	1/8/2019	\$ 907.50	\$ 165.00	5.5	Drafted Motion to Dismiss or in the Alternative to Consolidate.
Grayson J. Moulton	12/19/2018	\$ 44.00	\$ 55.00	0.8	Received and reviewed Complaint for Legal Separation by Lyndsey Licari.
Sandi Leitner	12/18/2018	\$ 16.50	\$ 55.00	0.3	Received Junes run back with the signed Order From Hearing Held on October 19, 2018; scanned and saved to cost file and pleadings file; filed in Family Court.
Sandi Leitner	12/18/2018	\$ 11.00	\$ 55.00	0.2	Received filed, stamped copy of the Order From Haring Held on October 19, 2018 from Court; saved to pleadings file; updated calendar.
Sandi Leitner	12/17/2018	\$ 5.50	\$ 55.00	0.1	Received letter between GJM and opposing counsel; saved to pleadings file.
Grayson J. Moulton	12/14/2018	\$ 33.00	\$ 55.00	0.6	Spoke with Bobby Antee about . Emailed opposing counsel concerning payment of mortgage.
Sandi Leitner	12/7/2018	\$ 11.00	\$ 55.00	0.2	Spoke with opposing counsel's office regarding the Order we have not received yet.
Sandi Leitner	12/7/2018	\$ 22.00	\$ 55.00	0.4	Received signed Order From Hearing Held on October 19, 2018 from opposing counsel; had GJM sign it; ordered Junes runner to deliver to the Judge for signature; scanned and saved to cost file and pleadings file.
Grayson J. Moulton	12/7/2018	\$ 16.50	\$ 55.00	0.3	Received and responded to email from Bobby Antee.
Grayson J. Moulton	12/6/2018	\$ 27.50	\$ 55.00	0.5	Received and reviewed Settlement Offer from opposing counsel. Passed the same on to Bobby Antee.
Sandi Leitner	12/5/2018	\$ -	\$ -	0.1	Left message for Mr. Tilman to return my call.
Sandi Leitner	11/29/2018	\$ 11.00	\$ 55.00	0.2	Spoke with Kathy at opposing counsel's office to see if he signed the Order sent to them. Advised it has been signed and sent back to us.
Sandi Leitner	11/27/2018	\$ 5.50	\$ 55.00	0.1	Received Certificate of Service from Court; saved to pleadings file.
Sandi Leitner	11/27/2018	\$ -	\$ -	0.2	Spoke with GJM regarding the Certificate of Service filed by Lindsey Antee; need to know if she is representing herself or is Tilman's office still her attorney.
Sandi Leitner	11/27/2018	\$ -	\$ -	0.2	Spoke with the receptionist at Tilman's office; they will get back to me as they are not sure if they are representing her - they were surprised that we received the Certificate of Service filed by Lindsey.
Sandi Leitner	11/27/2018	\$ -	\$ -	0.3	Received a message from AW from Mr. Tilman regarding representing Lindsey Antee; called back and left another message.
Sandi Leitner	11/27/2018	\$ 11.00	\$ 55.00	0.2	Spoke to opposing counsel's office-Kathy-to see if they are representing Lindsey because she filed a JPI on her own; they were surprised to hear that she did that-they will get back to me.
Aubry Wilson	11/16/2018	\$ -	\$ -	0.1	Received via fax letter from Christopher Tilman re: Lindsey Licari's Settlement Offer. Processed and emailed same to SL and GJM.
Sandi Leitner	11/16/2018	\$ 5.50	\$ 55.00	0.1	Received email from GJM to opposing counsel with the Order from the October hearing; saved to correspondence file.
Grayson J. Moulton	11/8/2018	\$ 247.50	\$ 165.00	1.5	Drafted Order After Hearing.
Sandi Leitner	10/25/2018	\$ 11.00	\$ 55.00	0.2	Received copy of Notice of Entry of Order in mail from opposing counsel-withdrawing as attorney; scanned and saved to correspondence file.
Sandi Leitner	10/25/2018	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of Notice of Entry of Order - Opposing counsel's Motion to Withdraw- from Court; saved to pleadings file.
Sandi Leitner	10/24/2018	\$ -	\$ -	0.1	Left message for Dept. J JEA to get the minutes from the hearing on 10-19-18 for GJM.
Sandi Leitner	10/24/2018	\$ 11.00	\$ 55.00	0.2	Received return call from Peggy in Dept. J advising the minutes from the 10-19-18 hearing will not be ready for a couple of more days; emailed GJM.
Sandi Leitner	10/19/2018	\$ -	\$ -	0.1	Received filed, stamped copy of Order to Withdraw from Court; saved to pleadings file.
Garrett R. Chase	10/19/2018	\$ 38.50	\$ 55.00	0.7	Printed exhibits and prepared for hearing; discussed hearing on temporary spousal support with GJM.
Garrett R. Chase	10/19/2018	\$ 330.00	\$ 165.00	2	Attended hearing on request for temporary spousal support.
Sandi Leitner	10/18/2018	\$ 5.50	\$ 55.00	0.1	Received Plaintiff's Opposition to Defendant's Request and Counterclaim for Attorney Fees; saved to pleadings file.
Sandi Leitner	10/18/2018	\$ 5.50	\$ 55.00	0.1	Received Defendant's Opposition to Plaintiff's Request for Counter-motion and For Attorneys Fees; saved to pleadings file.
Grayson J. Moulton	10/18/2018	\$ 27.50	\$ 55.00	0.5	Met with Bobby Antee and GRC to discuss tomorrow's hearing.
Garrett R. Chase	10/18/2018	\$ 159.50	\$ 55.00	2.9	Discussed reply from Lindsey Antee with GJM; reviewed motions for 10/19 hearing; reviewed pleadings and prepared for hearing; Met with Bobby Antee and GJM re: hearing on request for temporary spousal support; briefly, discussed opposition exhibits with GJM; reviewed reply by Ms. Licari.
Sandi Leitner	10/17/2018	\$ -	\$ -	0.1	Received filed, stamped copy of Bobby's Financial Disclosure Form; saved to pleadings file.
Grayson J. Moulton	10/17/2018	\$ -	\$ -	0.3	Spoke with GRC about case and scheduled hearing for Friday.
Sandi Leitner	10/16/2018	\$ 11.00	\$ 55.00	0.2	Made changes on Financial Disclosure Form; saved to file.

Sandi Leitner	10/16/2018	\$ 11.00	\$ 55.00	0.2	Emailled copy of the Opposition to Plaintiff's Request and Counter-motion for Attorney Fees to Lindsey; saved to correspondence file.
Sandi Leitner	10/16/2018	\$ 11.00	\$ 55.00	0.2	Filed Financial Disclosure Form in Family Court; scanned and saved to pleadings file.
Sandi Leitner	10/15/2018	\$ 16.50	\$ 55.00	0.3	Completed Family Court Motion/Opposition Fee Information Sheet; filed Family Court Motion/Opposition Fee Information Sheet and Defendant's Opposition to Plaintiff's Request and Counter-motion for Attorney's Fees and Costs in Family Court; scanned and saved to pleadings file.
Sandi Leitner	10/15/2018	\$ 38.50	\$ 55.00	0.7	Typed Bobby's Financial Disclosure Form; saved to projects file.
Sandi Leitner	10/15/2018	\$ -	\$ -	0.1	Received filed, stamped copy of the Motion/Opposition Fee Information Sheet and Defendant's Opposition to Plaintiff's Request and Counter-motion for Attorney's Fees from Court; saved to pleadings file.
Garrett R. Chase	10/15/2018	\$ -	\$ -	0.2	Discussed case and hearing on temporary spousal support with GJM.
Sandi Leitner	10/12/2018	\$ 5.50	\$ 55.00	0.1	Left message for Bobby to come in today to sign Opposition to Plaintiff's Request and Counter-motion for Attorney's Fees and complete a Financial Disclosure Form.
Sandi Leitner	10/12/2018	\$ 22.00	\$ 55.00	0.4	Met with Bobby to sign and notarize Defendant's Opposition to Plaintiff's Request and Counter-motion for Attorney's Fees and for him to complete the Financial Disclosure Form.
Sandi Leitner	10/12/2018	\$ 16.50	\$ 55.00	0.3	Spoke to GJM regarding the Opposition filing; e-signed for him; scanned and saved to pleadings file; filed in Family Court.
Sandi Leitner	10/11/2018	\$ -	\$ -	0.1	Received filed, stamped copy of Request for Issuance of Joint Preliminary Injunction; saved to pleadings file.
Grayson J. Moulton	10/11/2018	\$ 363.00	\$ 165.00	2.2	Finished drafting Opposition to Plaintiff's Request for Temporary Support.
Sandi Leitner	10/10/2018	\$ 22.00	\$ 55.00	0.4	Prepared Request for Issuance of Joint Preliminary Injunction; saved to projects file; had GJM sign; filed in Family Court; saved to pleadings file.
Grayson J. Moulton	10/10/2018	\$ 137.50	\$ 55.00	2.5	Began drafting Opposition to Request for Temporary Support.
Sandi Leitner	10/4/2018	\$ 5.50	\$ 55.00	0.1	Received Request for Submission of Motion or Counter-Motion Without Oral Argument; saved to pleadings file.
Sandi Leitner	10/2/2018	\$ 11.00	\$ 55.00	0.2	Received Plaintiff's Reply to Counterclaim in mail; scanned and saved to pleading s file and correspondence file.
Grayson J. Moulton	10/2/2018	\$ 16.50	\$ 55.00	0.3	Received and reviewed email from Bobby Antee.
Grayson J. Moulton	10/1/2018	\$ 99.00	\$ 55.00	1.8	Spoke on the phone with Linda Perdue concerning status of case. Reviewed documentation received from opposing party.
Grayson J. Moulton	9/25/2018	\$ 44.00	\$ 55.00	0.8	Received and reviewed documents from opposing party.
Sandi Leitner	9/20/2018	\$ 16.50	\$ 55.00	0.3	Had GJM sign the Notice of Non-Opposition to Opposing Counsel's Motion to Withdraw; scanned and saved to pleadings file; filed in Family Court.
Sandi Leitner	9/19/2018	\$ 11.00	\$ 55.00	0.2	Received Certificate of Mailing of opposing counsel's Certificate of Mailing of Motion to Withdraw as Attorney of Record; scanned and saved to correspondence file.
Sandi Leitner	9/18/2018	\$ 27.50	\$ 55.00	0.5	Prepared Notice of Non-Opposition to Opposing Counsel's Motion to Withdraw; saved to projects file.
Sandi Leitner	9/14/2018	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of opposing counsel's Motion to Withdraw; saved to pleadings file.
Aubry Wilson	8/30/2018	\$ 11.00	\$ 55.00	0.2	Scanned and saved Attorney Notes into file.
Sandi Leitner	8/30/2018	\$ 5.50	\$ 55.00	0.1	Received email from client with copies of the Gift Letters attached; saved to client documents file.
Paula Lamprea	8/22/2018	\$ -	\$ -	0.2	Per GJM request, called Mr. Antee and let him know that GJM. . Notified
Paula Lamprea	8/21/2018	\$ -	\$ -	0.2	Took message from Mr. Antee in regards to car insurance. Emailed GJM.
Sandi Leitner	8/20/2018	\$ 11.00	\$ 55.00	0.2	Received fax from Bobby advising us Lindsay sent a cease and desist order and also identity fraud; scanned and saved to file; gave to GJM.
Michael Van	8/17/2018	\$ 37.50	\$ 125.00	0.3	Case review to establish actions to be taken going forward.
Michael Van	8/17/2018	\$ 37.50	\$ 125.00	0.3	Reviewed the status of the Divorce and the continued threats via social media.
Sandi Leitner	8/15/2018	\$ 5.50	\$ 55.00	0.1	Received email from MCV from client with an email from Defendant's mom; saved to file.
Sandi Leitner	8/9/2018	\$ 5.50	\$ 55.00	0.1	Reviewed file to prepare for next step; put on list for GJM and MCV to review.
Grayson J. Moulton	7/31/2018	\$ 16.50	\$ 55.00	0.3	Spoke on the phone with client concerning .
Sandi Leitner	7/23/2018	\$ 11.00	\$ 55.00	0.2	Received Defendant's Answer and Counterclaim from GJM; saved to file; filed in Family Court.
Sandi Leitner	7/23/2018	\$ 5.50	\$ 55.00	0.1	Received filed, stamped copy of Defendant's Answer and Counterclaim; saved to pleadings file.
Sandi Leitner	7/20/2018	\$ 11.00	\$ 55.00	0.2	Notarized verification for Defendant's Answer and Counterclaim.
Grayson J. Moulton	7/20/2018	\$ 313.50	\$ 165.00	1.9	Drafted Answer to Complaint and Counterclaim.
Sandi Leitner	7/10/2018	\$ 11.00	\$ 55.00	0.2	Received signed fee agreement from PL; scanned and saved to file.
Grayson J. Moulton	7/9/2018	\$ -	\$ -	1.5	Met with Bobby Antee about his divorce.
Total Billings					\$ 33,022.00

Expenses				
Name	Date	Amount	Description	
Legal Wings	4/9/2020	\$ 100.00	Payment to Legal Wings for delivering the Trial Binder to Opposing Counsel, invoice R-1920453.01.	
Legal Wings	4/9/2020	\$ 74.00	Legal Wings Invoice N. P-1920076.01 for process serving.	
Legal Wings	4/9/2020	\$ 49.00	Legal Wings Invoice N. P-1919832.01 for process service.	
Legal Wings	3/10/2020	\$ 49.00	Legal Wings Invoice #P-1919832.01 for attempting service to Drew Dean Levy.	
USPS - Postage	1/24/2020	\$ 0.50	Mailed letter with \$32.53 check to Person Most Knowledgeable at Valley West Mortgage. Saved it to file.	
Valley West Mortgage	1/16/2020	\$ 32.53	Check for Don Drew Levy for Witness Fees.	
Odyssey File and Serve	10/29/2019	\$ 3.50	Filing fee for Certificate of Service.	
Odyssey File and Serve	10/14/2019	\$ 3.50	Filing fee for Defendant's Updated Financial Disclosures.	
USPS - Postage	9/25/2019	\$ 2.80	Postage fee for mailing Discovery Requests and drafts of Responses and instructional letter to Bobby for review and answering.	
USPS - Postage	5/31/2019	\$ 0.50	To mail the signed Stipulation and Order to opposing counsel.	
Odyssey File and Serve	5/3/2019	\$ 7.00	Filing fee: Notice of Non-Opposition to Opposing Counsel's Motion to Withdraw.	
Odyssey File and Serve	3/26/2019	\$ 7.00	Filing fee: Stipulation and Order to Continue Trial.	
Odyssey File and Serve	3/26/2019	\$ 7.00	Filing fee: Notice of Entry of Order	
Junes Legal Service, Inc.	2/22/2019	\$ 78.00	Check request in the amount of \$78.00 for invoice number EP148122 for a Rush Process service of Request for Production of Documents on Christopher Tillman, Esq.	
Odyssey File and Serve	2/11/2019	\$ 7.00	Filing fee: Affidavit of Service	
Odyssey File and Serve	2/8/2019	\$ 7.00	Filing Fee: Certificate of Service	
Odyssey File and Serve	1/11/2019	\$ 7.00	Filing fee: Defendant's Motion to Dismiss or in the Alternative Motion to Consolidate	
USPS - Postage	1/11/2019	\$ 0.89	To mail Defendant's Motion to Dismiss or in the Alternative Motion to Consolidate.	
Odyssey File and Serve	1/8/2019	\$ 7.00	Filing fee: Joint Preliminary Injunction	
Odyssey File and Serve	12/19/2018	\$ 7.00	Filing fee: Order From the Hearing Held on October 19, 2018.	
Odyssey File and Serve	10/18/2018	\$ 7.00	Filing fee: General Financial Disclosure Form.	
Odyssey File and Serve	10/15/2018	\$ 7.00	Filing fee: Motion/Opposition Fee Information Sheet and Opposition to Request and Counter-motion for Attorneys Fees.	
Odyssey File and Serve	10/11/2018	\$ 7.00	Filing Fee: Request for Issuance of Joint Preliminary Injunction.	
Odyssey File and Serve	7/24/2018	\$ 233.19	Filing fee: Defendant's Answer and Counterclaim	
Total Expenses		\$	704.41	

EXHIBIT 8

SHUMWAY • VAN

Client: Bobby Dee Antee
Matter: Antee, Bobby adv. Licar'i, Lindsey

Overview	
Total Billings	\$ 25,367.00
Total Expenses	\$ 315.33
Total Combined	\$ 25,682.33

Billings					
User	Date	Amount	Hourly Rate	Total Time	Description
Grayson J. Moulton	6/5/2020	\$ 860.00	\$ 215.00	4	Finished drafting Motion for Attorney's Fees, and Declaration of GJM in Support of Motion.
Grayson J. Moulton	6/5/2020	\$ 5.50	\$ 55.00	0.1	Met with PL to discuss status of case and steps moving forward including upcoming hearings.
Grayson J. Moulton	6/4/2020	\$ 430.00	\$ 215.00	2	Began revisions to Motion to Attorney's Fees to address recent filings by Lindsey Antee.
Grayson J. Moulton	6/3/2020	\$ 11.00	\$ 55.00	0.2	Received and reviewed notice of hearing. Discussed status of case with GRC.
Grayson J. Moulton	6/2/2020	\$ 430.00	\$ 215.00	2	Received and reviewed Plaintiff's Motion for Stay of Execution of Divorce Order, Notice of Appeal, Case Appeal Statement, and Request for Transcript of Proceedings. Discussed the same with GRC. Reviewed case law and statutes concerning stays of execution.
Grayson J. Moulton	5/29/2020	\$ 430.00	\$ 215.00	2	Continued drafting Motion for Attorney's Fees and Costs and redacted billings.
Grayson J. Moulton	5/26/2020	\$ 537.50	\$ 215.00	2.5	Received and reviewed minute order from the court. Broke down the same. Emailed Bobby Antee a summary and discussed the same over the phone.
Grayson J. Moulton	5/26/2020	\$ 645.00	\$ 215.00	3	Began drafting Motion for Attorney's Fees and Costs.
Grayson J. Moulton	5/15/2020	\$ 11.00	\$ 55.00	0.2	Corresponded with the Department J Law Clerk concerning status and timeline for ruling.
Grayson J. Moulton	4/30/2020	\$ 11.00	\$ 55.00	0.2	Corresponded with Bobby Antee concerning counsel. Emailed the same to opposing counsel.
Grayson J. Moulton	4/22/2020	\$ 43.00	\$ 215.00	0.2	Corresponded with opposing counsel concerning status of HOA and Republic Services bills.
Grayson J. Moulton	4/17/2020	\$ 129.00	\$ 215.00	0.6	Corresponded with opposing counsel concerning mortgage payments, and HOA status. Corresponded with Department J law clerk concerning status of ruling.
Grayson J. Moulton	4/15/2020	\$ 11.00	\$ 55.00	0.2	Corresponded with Department J to discuss status of ruling.
Christina Garcia	4/9/2020	\$ 17.00	\$ 85.00	0.2	Received Legal Wings invoice R-1920453.01 for delivering the Trial Binders to Opposing Counsel, saved to file, prepared and submitted check request for payment.
Paula Lamprea	4/9/2020	\$ 34.00	\$ 85.00	0.4	Check request in the amount of \$74.00 payable to Legla Wings for Process service. Scanned and saved to the account.
Paula Lamprea	4/9/2020	\$ 34.00	\$ 85.00	0.4	Check Request in the amount of \$49.00, payable to Legal Wings for process service
Paula Lamprea	3/30/2020	\$ 17.00	\$ 85.00	0.2	Received and saved email correspondence from GJM to Peggy Lou from Dept G re. the Decree of Divorce.
Grayson J. Moulton	3/27/2020	\$ 11.00	\$ 55.00	0.2	Followed up with Court to inquire about status of case and timeline for receiving Decree of Divorce.
Paula Lamprea	3/10/2020	\$ 25.50	\$ 85.00	0.3	Check request in the amount of \$49.00 for process service provided by Legal Wings to serve Drew Dean Levy at the mortgage company. Sent request to accounting for processing.
Grayson J. Moulton	2/27/2020	\$ 43.00	\$ 215.00	0.2	Corresponded with Bobby Antee and Linda Naw concerning counsel. Also corresponded with opposing counsel concerning contempt payment.
Grayson J. Moulton	2/12/2020	\$ 1,956.50	\$ 215.00	9.1	Prepared for and attended trial, Day 2.
Grayson J. Moulton	2/11/2020	\$ 709.50	\$ 215.00	3.3	Met with Bobby Antee and Linda Naw to review case and prepare for tomorrow's continued trial. Finalized changed questions for Lindsey, Linda, and Bobby.
Grayson J. Moulton	2/10/2020	\$ 451.50	\$ 215.00	2.1	Reviewed notes from trial and files pursuant to day 1 of trial. Prepared for Wednesday continued trial. Corresponded with opposing counsel concerning the same.
Grayson J. Moulton	2/7/2020	\$ 16.50	\$ 55.00	0.3	Spoke on the phone with Linda Perdue concerning testimony and closing disclosures.
Grayson J. Moulton	2/7/2020	\$ 1,290.00	\$ 215.00	6	Prepared for and attended trial.
Grayson J. Moulton	2/6/2020	\$ 66.00	\$ 55.00	1.2	Spoke on the phone with Bobby Antee about obtaining police report. Spoke on the phone with Detective Williams about her investigation. Spoke on the phone with counsel for Valley West Mortgage about testifying in hearing.
Grayson J. Moulton	2/6/2020	\$ 1,333.00	\$ 215.00	6.2	Finalized trial preparations. Met with Bobby Antee and Linda Perdue for witness prep. Completed questions, and finalized attack plan.
Grayson J. Moulton	2/5/2020	\$ 1,010.50	\$ 215.00	4.7	Continued trial preparation. Finalized questions for Linda Perdue and Bobby Antee. Corresponded with opposing counsel and held teleconference on settlement. Discussed the same with Bobby Antee.
Grayson J. Moulton	2/4/2020	\$ 688.00	\$ 215.00	3.2	Continued trial preparation. Corresponded and spoke on the phone with Detective Michelle Wilson concerning criminal charges filed by Lindsey Licari. Corresponded and spoke on the phone with Bobby Antee concerning police report and need to pick up report from Records Bureau. Corresponded with opposing counsel concerning police report and settlement possibilities.
Christina Garcia	1/30/2020	\$ 5.50	\$ 55.00	0.1	Received confirmation from the runner that the trial binders were delivered to the court and opposing counsel.
Grayson J. Moulton	1/29/2020	\$ 430.00	\$ 215.00	2	Held Pre-trial Teleconference with Opposing Counsel. Reviewed documentation and continued trial preparations.
Grayson J. Moulton	1/29/2020	\$ 64.50	\$ 215.00	0.3	Corresponded with opposing counsel concerning discovery responses. Provided him with the same.
Victoria Correa	1/28/2020	\$ -	\$ -	0.2	Received via fax: received Financial Disclosure form from Bobby Antee. Saved it to file and emailed GJM.
Alexis Duecker	1/28/2020	\$ 25.00	\$ 125.00	0.2	Meeting with GRC re:
Christina Garcia	1/28/2020	\$ 405.00	\$ 135.00	3	Prepared trial binders. Requested runner to deliver binders to the courthouse and opposing counsel.
Grayson J. Moulton	1/28/2020	\$ 1,440.50	\$ 215.00	6.7	Prepared, drafted, and filed Pre-trial Memorandum. Finalized trial binder.
Grayson J. Moulton	1/27/2020	\$ 1,096.50	\$ 215.00	5.1	Finalized and compiled all exhibits for trial. Received and reviewed Plaintiff's First Supplemental Disclosure of Documents and Witnesses. Spoke on the phone with Bobby Antee and opposing counsel concerning the status of the case.
Christina Garcia	1/24/2020	\$ 13.50	\$ 135.00	0.1	Telephone call with the Process Server with regard to the location of serving the West Valley Mortgage Trial Subpoena.
Margaret A. Manning	1/24/2020	\$ 37.50	\$ 125.00	0.3	Gathered and sent GJM emails and text messages regarding Mortgage lender and his requests for gift letters.
Victoria Correa	1/24/2020	\$ -	\$ -	0.1	Mailed letter with \$32.53 check to Person Most Knowledgeable at Valley West Mortgage. Saved it to file.
Karl A. Shelton	1/24/2020	\$ 60.00	\$ 300.00	0.2	Reviewed Opposition to Motion for Summary Judgment, met with GJM re: same.
Grayson J. Moulton	1/24/2020	\$ 1,118.00	\$ 215.00	5.2	Continued compiling documents for exhibits and drafting trial strategy. Conducted research on nature of funds in joint accounts.
Paula Lamprea	1/23/2020	\$ 16.50	\$ 55.00	0.3	Received the updated Trial/Evidentiary Hearing Subpoena to serve Valley West Mortgage, updated the chronological file and sent the new check request to Accounting and GJM for processing.
Paula Lamprea	1/23/2020	\$ 11.00	\$ 55.00	0.1	Corresponded to email from Legal Wings regarding service to Drew Dean Levy, updated them with the new service information.
Grayson J. Moulton	1/23/2020	\$ 903.00	\$ 215.00	4.2	Drafted and filed Opposition to Plaintiff's Motion for Partial Summary Judgment. Filed up with PL concerning Subpoena of Drew Levy. Modified Subpoena to go to Person Most Knowledgeable for Valley West Mortgage.
Grayson J. Moulton	1/22/2020	\$ 215.00	\$ 215.00	1	Began sorting documents into exhibits for trial.
Paula Lamprea	1/21/2020	\$ 59.50	\$ 85.00	0.7	Tasked by GJM, revised the Process/Runner Service for the Subpoena to serve Drew Dean Levy. Called Legal Wings to find status of serving process and printed the subpoena for GJM's signature. Scanned and saved to the file and emailed the same to Legal wings to update the current process request. Received confirmation from Legal Wings that they got the signed subpoena and they will get the same ready to be served. Notified GJM.
Myranda Matys	1/17/2020	\$ 57.50	\$ 115.00	0.5	Legal wings run ws created to serve the Trial Subpoena upon Drew Dead Levy. Saved a copy of the run sheet to the chronological file for future attorney reference. Calendared the deadline to with Withdraw for February 10, 2020.
Grayson J. Moulton	1/17/2020	\$ 43.00	\$ 215.00	0.2	Received and reviewed Offer of Judgment from Plaintiff. Discussed the same with Bobby Antee.
Myranda Matys	1/16/2020	\$ 23.00	\$ 115.00	0.2	Check Request was made in the amount of \$27.12 for Don Drew Levy for Witness fees. Filing fees have been sent to accounting for processing.
Grayson J. Moulton	1/16/2020	\$ 215.00	\$ 215.00	1	Drafted Subpoena of Drew Dean Levy for Trial. Directed MM to file the same. Spoke on the phone with Linda Perdue concerning trial. Reviewed documents related to Drew Levy. Directed MM to prepare check request for witness fees.

Myranda Matys	1/16/2020	\$ 34.50	\$ 115.00	0.3	Reviewed and saved the file stamped Order Shortening time on the Hearing for the Motion for Partial Summary Judgment. Updated calendar to reflect the new hearing date. Email correspondence to Bobby Antee with the Order Shortening Time and the Motion for Partial Summary Judgment enclosed.
Myranda Matys	1/15/2020	\$ 23.00	\$ 115.00	0.2	Served the Defendants Amended Response to Plaintiff's Interrogatories to opposing counsel through the Eighth Judicial District Court Family Division Odyssey Portal. Saved the e-served response to the chronological file in preparation for further discovery.
Grayson J. Moulton	1/15/2020	\$ 64.50	\$ 215.00	0.3	Spoke on the phone with opposing counsel concerning settlement discussions.
Paula Lamprea	1/14/2020	\$ 11.00	\$ 55.00	0.2	Telephone call with Bobby Antee
Grayson J. Moulton	1/10/2020	\$ 215.00	\$ 215.00	1	Reviewed case file and Plaintiff's Motion for Partial Summary Judgment. Discussed the same on the phone with Bobby Antee.
Myranda Matys	1/9/2020	\$ 23.00	\$ 115.00	0.2	Reviewed and saved the file stamped Plaintiff's Motion for Partial Summary Judgment and the Notice of Hearing to the chronological file in preparation for the hearing on the Motion for Partial Summary Judgment. Critical deadlines were calendared.
Grayson J. Moulton	1/8/2020	\$ 107.50	\$ 215.00	0.5	Received and reviewed Plaintiff's Motion for Partial Summary Judgment.
Grayson J. Moulton	1/6/2020	\$ 43.00	\$ 215.00	0.2	Corresponded with opposing counsel concerning settlement terms and discovery.
Grayson J. Moulton	1/3/2020	\$ 43.00	\$ 215.00	0.2	Received and responded to email corresponded from opposing counsel concerning settlement terms.
Grayson J. Moulton	12/11/2019	\$ 322.50	\$ 215.00	1.5	Held 2.34 Teleconference with opposing counsel to discuss lack of payment on mortgage, settlement discussions, and request to update interrogatories.
Grayson J. Moulton	12/10/2019	\$ 99.00	\$ 55.00	1.8	Corresponded with opposing counsel concerning teleconference and settlement. Discussed need to update interrogatory responses. Reviewed discovery responses for potential changes to make.
Grayson J. Moulton	12/9/2019	\$ 215.00	\$ 215.00	1	Sent opposing counsel an email containing updated settlement terms after discussion with Bobby Antee. Corresponded with opposing counsel about setting up a conference call to discuss the same.
Grayson J. Moulton	12/6/2019	\$ 258.00	\$ 215.00	1.2	Met with Bobby Antee and Linda Naw to discuss settlement, current status of case, and necessary preparations for trial.
Grayson J. Moulton	12/5/2019	\$ 43.00	\$ 215.00	0.2	Received correspondence from opposing counsel concerning settlement.
Grayson J. Moulton	12/4/2019	\$ 129.00	\$ 215.00	0.6	Corresponded with opposing counsel concerning settlement offers.
Myranda Matys	12/3/2019	\$ 15.00	\$ 75.00	0.2	Email correspondence to Mr. Antee . Discussed
Myranda Matys	12/2/2019	\$ 7.50	\$ 75.00	0.1	Discussed the status of matter and AR with GJM during our morning meeting. Updated the Master Service list in Odyssey.
Myranda Matys	11/27/2019	\$ 7.50	\$ 75.00	0.1	Email correspondence between GJM and opposing counsel with regards to a possible settlement agreement between the parties has been reviewed and saved to the chronological file.
Grayson J. Moulton	11/22/2019	\$ 22.00	\$ 55.00	0.4	Corresponded with Bobby Antee concerning . Corresponded with opposing counsel concerning the same.
Grayson J. Moulton	11/19/2019	\$ 11.00	\$ 55.00	0.2	Corresponded with Bobby Antee concerning status of case and need for payment.
Susan Ward	11/15/2019	\$ 38.50	\$ 55.00	0.7	Called Las Vegas Valley Water Company regarding the water shut off and bill at the marital residence, they negotiated the bill down due to not only the customers but their mistake as well, confirmed Lindsey can now pay the reduced balance and may start service in her name.
Susan Ward	11/15/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's Fourth Supplemental Disclosures Pursuant to NRCP 16.2 through the Court portal; saved service stamped copy to file.
Grayson J. Moulton	11/15/2019	\$ 66.00	\$ 55.00	1.2	Reviewed 4th Supplemental Disclosure of Documents and Witnesses for service. Continued correspondence with opposing counsel concerning the reinstatement of water at the Scorpion Court property.
Grayson J. Moulton	11/14/2019	\$ 44.00	\$ 55.00	0.8	Corresponded with opposing counsel concerning the water being shut off at the Scorpion Court property.
Grayson J. Moulton	11/13/2019	\$ 137.50	\$ 55.00	2.5	Conducted research concerning "compound interrogatories" and reviewed the same against our responses to discovery requests.
Susan Ward	11/12/2019	\$ 38.50	\$ 55.00	0.7	Finalized Defendant's Fourth Supplemental Disclosures adding new documents to disclosure; saved to file and printed for GJM to review and sign.
Susan Ward	11/12/2019	\$ 55.00	\$ 55.00	1	Organized client documents to ensure everything that was disclosed is in the right sub-folder, then put document to be added to the Fourth Supplemental Disclosures into the appropriate sub-folder and labeled documents accordingly to stay organized for trial.
Susan Ward	11/12/2019	\$ 27.50	\$ 55.00	0.5	Bates and redacted the final documents being disclosed in the Fourth Supplemental Disclosures.
Grayson J. Moulton	11/12/2019	\$ 16.50	\$ 55.00	0.3	Corresponded with opposing counsel concerning discovery disputes.
Susan Ward	11/8/2019	\$ 11.00	\$ 55.00	0.2	Legal Wings returned from the Court Notice of Entry of Order from Hearing on February 13, 2019; reviewed and scanned to file.
Victoria Correa	11/6/2019	\$ -	\$ -	0.2	Received via fax: 2017 IRS Tax Statement regarding Lindsey Antee. Saved it to file and emailed SW.
Susan Ward	11/1/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's Response to Plaintiff's Initial Interrogatories through the court; saved service stamped copy to file.
Grayson J. Moulton	11/1/2019	\$ 742.50	\$ 165.00	4.5	Drafted and finalized Responses to Interrogatories. Directed SW to file after receipt of Bobby's signature.
Susan Ward	10/31/2019	\$ 15.00	\$ 75.00	0.2	Drafted Defendant's Fourth Supplemental Disclosures; saved to file to add future documents.
Susan Ward	10/31/2019	\$ 5.50	\$ 55.00	0.1	Bates and redacted Wells Fargo payment history to attach to the Fourth Supplemental Disclosures.
Susan Ward	10/29/2019	\$ 176.00	\$ 55.00	3.2	Bates and redacted documents being produced in Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2 so the documents can correlate with answers in Defendant's Response to Plaintiff's First Set of Requests for Production of Documents; saved and labeled to file.
Susan Ward	10/29/2019	\$ 16.50	\$ 55.00	0.3	Finalized edits to Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2; saved to file and printed for signature.
Susan Ward	10/29/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2 and Defendant's Response to Plaintiff's First Set of Requests for Production of Documents through the Court; saved service stamped copy to file.
Susan Ward	10/29/2019	\$ 16.50	\$ 55.00	0.3	Burned Third Supplemental Documents to a disc for mailing to Opposing Counsel.
Susan Ward	10/29/2019	\$ 11.00	\$ 55.00	0.2	Prepared Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2 and disc of documents for mailing to Opposing Counsel for review; saved to file for tracking purposes.
Susan Ward	10/29/2019	\$ 15.00	\$ 75.00	0.2	Drafted Certificate of Service regarding Defendant's Third Supplemental Disclosures Pursuant to NRCP 16.2; saved to file and printed for signature.
Susan Ward	10/29/2019	\$ 11.00	\$ 55.00	0.2	Prepared and file/served Certificate of Service with the Court; saved file stamped copy to file and forwarded filing receipt to accounting for processing.
Grayson J. Moulton	10/29/2019	\$ 330.00	\$ 165.00	2	Finished drafting Responses to Requests for Production of Documents. Directed SW to serve the same upon opposing counsel.
Grayson J. Moulton	10/29/2019	\$ 55.00	\$ 55.00	1	Corresponded repeatedly with opposing counsel concerning payments made on the mortgage. Reviewed bank statements provided by opposing party.
Susan Ward	10/28/2019	\$ 11.00	\$ 55.00	0.2	Received emails from Bobby with
Susan Ward	10/28/2019	\$ 11.00	\$ 55.00	0.2	Drafted 3rd Supplemental Disclosure; saved to file.
Grayson J. Moulton	10/28/2019	\$ 775.50	\$ 165.00	4.7	Continued Drafting Responses to Requests for Production of Documents (61 Requests in Total). Reviewed and approved Third Supplemental Disclosure of Documents.
Susan Ward	10/21/2019	\$ 11.00	\$ 55.00	0.2	Received an email with the link to Lindsey's Facebook regarding her car being robbed; notified GJM of content and saved to file.
Susan Ward	10/21/2019	\$ 16.50	\$ 55.00	0.3	Received email from new counsel requesting documents from our Initial Disclosures; created a dropbox link and forwarded content to new counsel for his review.
Susan Ward	10/21/2019	\$ 5.50	\$ 55.00	0.1	Email Bobby to
Susan Ward	10/21/2019	\$ 5.50	\$ 55.00	0.1	Received email from Bobby with
Grayson J. Moulton	10/21/2019	\$ 82.50	\$ 55.00	1.5	Corresponded with opposing counsel concerning home insurance for a break-in to opposing party's car.
Grayson J. Moulton	10/21/2019	\$ 165.00	\$ 165.00	1	Drafted Responses to Requests for Production of Documents.

Darnell Lynch	10/18/2019	\$ 30.00	\$ 75.00	0.4	Prepared for electronic service defendant's First Set of Interrogatories to Defendant. Received served copies, saved all copies to file, calendared Lindsey's deadline to respond to same.
Susan Ward	10/18/2019	\$ 27.50	\$ 55.00	0.5	Reviewed and updated attorney information and some formatting on Defendant's First Set of Requests for Admissions to Plaintiff and Defendant's First Set of Interrogatories to Plaintiff; saved to file.
Grayson J. Moulton	10/18/2019	\$ 445.50	\$ 165.00	2.7	Drafted First Set of Interrogatories to Defendant.
Garrett R. Chase	10/17/2019	\$ 5.50	\$ 55.00	0.1	Discussed September 2018 Family Court hearing with GJM.
Susan Ward	10/17/2019	\$ 11.00	\$ 55.00	0.2	Prepared and served Defendant's First Supplemental Disclosures Pursuant to NRCP 16.2 through the Court; saved service stamped copy to file.
Susan Ward	10/17/2019	\$ 16.50	\$ 55.00	0.3	Received Carmax vehicle purchase agreement, student loan statements and auto loan statements from Bobby, saved them to file and labeled them to correlate with which response they belong to.
Grayson J. Moulton	10/17/2019	\$ 137.50	\$ 55.00	2.5	Reviewed documents for production and for use in Response to Request for Production and Interrogatories.
Darnell Lynch	10/16/2019	\$ 22.50	\$ 75.00	0.3	Finalized first supplemental list of witnesses and documents for GJM signature, electronically served same and saved file-stamped copy. Followed up with SW re draft on first supplement not finalized. Need to serve an amended supplement.
Susan Ward	10/16/2019	\$ 126.50	\$ 55.00	2.3	Received more emails from Bobby with reviewed and labeled to correlate to each response.
Susan Ward	10/16/2019	\$ 11.00	\$ 55.00	0.2	Emailled Bobby to request
Grayson J. Moulton	10/16/2019	\$ 16.50	\$ 55.00	0.3	Reviewed Second Supplemental Disclosures and directed DL to serve the same.
Darnell Lynch	10/15/2019	\$ 15.00	\$ 75.00	0.2	Continued saving and incorporating into file bates-stamped documents used for the 1st supplemental list of witnesses and documents. Organized plaintiff's and defendant's electronic discovery folders.
Darnell Lynch	10/15/2019	\$ -	\$ -	0.2	Met with GJM and discussed bates-stamped payments already disclosed, updated first supplemental list of witnesses and documents.
Darnell Lynch	10/14/2019	\$ 45.00	\$ 75.00	0.6	Prepared plaintiff's second supplemental disclosure of witnesses and document for GJM review. Bates-stamped Crescent valley association assessment statements for disclosure in same.
Susan Ward	10/14/2019	\$ 11.00	\$ 55.00	0.2	Prepared and file/served Defendant's Updated Financial Disclosures with the Court; saved file stamped copy to file and forwarded filing receipt to accounting for processing.
Susan Ward	10/14/2019	\$ 16.50	\$ 55.00	0.3	Emailled Bobby with more requests of documents to finalize the discovery responses due.
Susan Ward	10/14/2019	\$ 55.00	\$ 55.00	1	Continued reviewing, labeling and organizing client documents we had on file to attach to each response to the Request for Production.
Grayson J. Moulton	10/14/2019	\$ 33.00	\$ 55.00	0.6	Reviewed and approved Financial Disclosure Form for filing. Met with SW to review discovery requests and directed her to acquire necessary documents from Bobby Antee.
Darnell Lynch	10/11/2019	\$ 15.00	\$ 75.00	0.2	Reviewed case calendar per upcoming discovery deadline & e-mailed GJM, instructed to prepare initial disclosures using association statements per upcoming discovery deadline.
Susan Ward	10/10/2019	\$ 137.50	\$ 55.00	2.5	Received multiple emails with requested documents from Bobby; labeled and saved all documents by response number to client documents for adding to our responses to Request for Productions.
Susan Ward	10/10/2019	\$ 82.50	\$ 55.00	1.5	Started labeling and organizing client documents we already had to each response to the Request for Production.
Darnell Lynch	10/4/2019	\$ -	\$ -	0.1	Met with GJM re upcoming discovery deadline & he needs to send HOA statements to opposing counsel to show Bobby has been paying the assessments.
Susan Ward	10/3/2019	\$ 11.00	\$ 55.00	0.2	Reviewed correspondence from Bobby re: ; saved correspondence to file.
Darnell Lynch	10/3/2019	\$ 22.50	\$ 75.00	0.3	Received & incorporated into file accounting ledgers for 9564 Scorpion Track Ct. e-mailed from Yvette with Complete Association Management in response to GJM letter requesting statements. Saved e-mail correspondence to file.
Darnell Lynch	10/2/2019	\$ 22.50	\$ 75.00	0.3	Telephone call to Yvette with Complete association management to follow up on assessment statements for 9654 Scorpion Track Court, left voicemail, and sent e-mail correspondence to Yvette re same. Changed calendar entry re reminder for discovery cut-off to October 11 as discussed with GJM in calendar meeting.
Susan Ward	10/2/2019	\$ 120.00	\$ 75.00	1.6	Filled in Bobby's answers in the drafted Responses to Plaintiff's Initial Request for Production of Documents, researched documents he stated we have on file; saved to file for GJM to review and complete.
Susan Ward	10/2/2019	\$ 27.50	\$ 55.00	0.5	Emailled Bobby with Production questions we need documentation for and emailed him an updated Financial Disclosure Form for him to complete; saved correspondence to file.
Susan Ward	10/2/2019	\$ 11.00	\$ 55.00	0.2	Drafted updated Financial Disclosures; saved to file.
Grayson J. Moulton	10/2/2019	\$ 5.50	\$ 55.00	0.1	Received and responded to email from opposing counsel concerning insurance for Lindsey Licari.
Susan Ward	10/1/2019	\$ 97.50	\$ 75.00	1.3	Filled in Bobby's interrogatory answers in the drafted Responses to Plaintiff's Initial Interrogatories; saved to file for GJM to review and complete.
Darnell Lynch	9/30/2019	\$ -	\$ -	0.3	Met with GJM and discussed responses to discovery due in two weeks and MM handling, updated GJM case spreadsheet of status and matter deadlines.
Myranda Matys	9/27/2019	\$ 88.00	\$ 55.00	1.6	Meeting with Bobby Antee to go over
Susan Ward	9/25/2019	\$ 16.50	\$ 55.00	0.3	Drafted an instructional letter to Bobby re:
Susan Ward	9/25/2019	\$ 16.50	\$ 55.00	0.3	Prepared Discovery Requests and drafts of Responses and instructional letter for mailing, and emailing to Bobby for review and answering.
Grayson J. Moulton	9/25/2019	\$ 11.00	\$ 55.00	0.2	Corresponded with opposing counsel and with Bobby Antee concerning insurance problems.
Susan Ward	9/24/2019	\$ 112.50	\$ 75.00	1.5	Drafted Defendant's Responses to Plaintiff's Initial Request for Production of Documents; saved to file.
Susan Ward	9/24/2019	\$ 97.50	\$ 75.00	1.3	Drafted Defendant's Responses to Plaintiff's Initial Interrogatories; saved to file.
Myranda Matys	9/24/2019	\$ 16.50	\$ 55.00	0.3	Phone correspondence from Bobby Antee re: He needs clarity on the discovery requests that were sent to him. Set up an appointment for Friday September 27, 2019 at 1:30 pm to go over his discovery responses.
Grayson J. Moulton	9/24/2019	\$ 22.00	\$ 55.00	0.4	Corresponded with opposing counsel and with Bobby Antee to discuss the insurance issue and how to resolve the same.
Susan Ward	9/23/2019	\$ 11.00	\$ 55.00	0.2	Received served Plaintiff's Initial Request for Production of Documents to Defendant and Plaintiff's Initial Interrogatories to Defendant; reviewed and saved to file.
Grayson J. Moulton	9/23/2019	\$ 11.00	\$ 55.00	0.2	Received and responded to email from opposing counsel concerning insurance issues.
Grayson J. Moulton	9/20/2019	\$ 27.50	\$ 55.00	0.5	Received and reviewed Plaintiff's Interrogatories and Requests for Production of Documents. Directed SW to create shells and to send the same to Bobby Antee for review.
Darnell Lynch	9/19/2019	\$ 22.50	\$ 75.00	0.3	Telephone call to Yvette with Complete Association Management to follow up on request for statement for Crescent Valley HOA. Stated she doesn't have statements but will send me ledgers today, informed GJM of same.
Darnell Lynch	9/11/2019	\$ 45.00	\$ 75.00	0.6	Received and incorporated into file mailed plaintiff's initial disclosures of witnesses & documents pursuant to NRCP 16.2. Downloaded and saved CD of documents that accompanied same, e-mailed documents to GJM for review.
Darnell Lynch	9/11/2019	\$ -	\$ -	0.2	Telephone call to Yvette with complete association management re follow up on GJM letter requesting Crescent Valley Association assessment statements. She was not available.
Darnell Lynch	9/9/2019	\$ 45.00	\$ 75.00	0.6	Received and saved to file envelope of returned mail from Crescent Valley Association marked return to sender re GJM letter requesting statements. Telephone call to Crescent Valley Association, no answer. Performed business entity search on Nevada Secretary of state website. Telephone call to Susan with Complete Association Management Company (CAMCO) accounting department. Sent e-mail to CAMCO enclosing GJM's letter.
Darnell Lynch	9/9/2019	\$ -	\$ -	0.2	Telephone call to Complete Association Management Company to confirm receipt of my e-mail; informed GJM's letter forwarded to Yvette, supervisor. Left voicemail for Yvette re request for statements.
Darnell Lynch	9/6/2019	\$ -	\$ -	0.9	Prepared shell of Motion to Compel discovery response, finalized declaration of GJM, & prepared exhibits. Received and incorporated into file e-mail correspondence to opposing counsel re utility payments; calendared deadline for Lindsey to pay Bobby Republic Services balance.
Alexis Duecker	9/6/2019	\$ -	\$ -	1.2	Prepared a draft of a Motion to Compel Discovery due to Plaintiff's failure to produce any required disclosures by the extended deadline of September 3, 2019.
Grayson J. Moulton	9/6/2019	\$ -	\$ -	0.5	Reviewed Motion to Compel. Received and reviewed Disclosure of Documents and Responses to Discovery sent by opposing party.

Darnell Lynch	9/5/2019	\$ 45.00	\$ 75.00	0.6	Received and incorporated into file mailed Republic services statements & notice of intent to lien, sent to GJM, telephone call to Republic services re final payoff amount, saved e-mails from to client re need to pay lien & to opposing counsel re motion to compel in lieu of timely discovery response deadline.
Grayson J. Moulton	9/5/2019	\$ 66.00	\$ 55.00	1.2	Corresponded with opposing counsel concerning production of documents and payments of utilities. Reviewed statements from Republic Services. Discussed the same with Bobby Antee.
Darnell Lynch	9/4/2019	\$ -	\$ -	0.6	Received and saved into file text messages to Bobby Antee re Republic Services will mail us trash services statements & authority to access account. E-mailed GJM & informed him of same. Telephone call to Crescent Valley Association to follow up on fax re request for assessment statements. No answer, left voicemail.
Darnell Lynch	9/4/2019	\$ -	\$ -	0.5	Telephone call to representative at Las Vegas valley water district to obtain water bill statements, was told Mr. Antee was not on the account for the property at 9564 Scorpion Track Court. Informed GJM re same.
Alexis Duecker	9/4/2019	\$ 12.50	\$ 125.00	0.1	Meeting with GRM re: preparing Motion to Compel re: the lack of initial disclosures and no additional discovery being produced within extended deadline.
Grayson J. Moulton	9/4/2019	\$ 11.00	\$ 55.00	0.2	Met with AD to discuss case strategy and assign Motion to Compel Discovery.
Darnell Lynch	9/4/2019	\$ -	\$ -	0.1	Telephone call to Crescent Valley Association re follow up on fax re request for statements. No answer, left voicemail.
Darnell Lynch	9/3/2019	\$ 67.50	\$ 75.00	0.9	Re-faxed GJM's letter to Crescent Valley Association requesting homeowner's association statements following multiple unsuccessful fax results. Telephone calls to Crescent Valley Association, Las Vegas valley water district, long hold time, will try back. Consulted with GJM, telephone calls to Republic Services Lien department & Bobby Antee re: send SV statements. Requested PL send Bobby text message re: same. Response to client re: statement being mailed.
Paula Lamprea	9/3/2019	\$ -	\$ -	0.2	Requested PL send Bobby text message re: same. Response to client re: statement being mailed.
Grayson J. Moulton	9/3/2019	\$ 16.50	\$ 55.00	0.3	578-5372 per DL.
					Corresponded with opposing counsel confirming payment of mortgage.
Darnell Lynch	8/30/2019	\$ 60.00	\$ 75.00	0.8	Prepared letter to Crescent Valley Association requesting assessment statements for the purpose of producing same in re community debts, faxed & mailed letter to the association. Sent multiple faxes as they were returned deliverable. Telephone calls to Crescent Valley association, no answer, left voicemail.
Grayson J. Moulton	8/29/2019	\$ 16.50	\$ 55.00	0.3	Received and reviewed email received from Bobby Antee containing new social media posts by Lindsey Antee. Emailed opposing counsel to relay the information and request such posts cease.
Darnell Lynch	8/28/2019	\$ -	\$ -	0.2	Discussed with GJM outcome of NRS 2.34 telephonic conference; instructed to obtain homeowner's association dues, water and trash statements from each entity for the purposes of producing said statements in discovery.
Susan Ward	8/28/2019	\$ 45.00	\$ 75.00	0.6	Drafted Defendant's First Supplemental Disclosures added new financial documents to table with bates range; saved to file and printed for review and signature.
Susan Ward	8/28/2019	\$ 55.00	\$ 55.00	1	Bates labeled and redacted and organized new financial documents to correlate with previously disclosed documents; to add to Defendant's First Supplemental Disclosure.
Grayson J. Moulton	8/28/2019	\$ 44.00	\$ 55.00	0.8	Received and responded to settlement offer from opposing counsel. Discussed the same with GRC and SW.
Grayson J. Moulton	8/27/2019	\$ 55.00	\$ 55.00	1	Received and reviewed documents from Bobby Antee concerning payments made for utilities.
Grayson J. Moulton	8/27/2019	\$ 165.00	\$ 165.00	1	Held 2.34 Meet and Confer Teleconference with opposing counsel about when documents would be produced. Informed him that he would have until September 3 to produce all documents.
Grayson J. Moulton	8/23/2019	\$ 38.50	\$ 55.00	0.7	Corresponded with and spoke over the phone with Bobby Antee concerning . Bobby
Grayson J. Moulton	8/22/2019	\$ 44.00	\$ 55.00	0.8	committed to provide
Grayson J. Moulton	8/20/2019	\$ 27.50	\$ 55.00	0.5	Corresponded with Bobby Antee and opposing counsel concerning status of payment on marital home.
					Corresponded with Bobby Antee concerning
Susan Ward	8/16/2019	\$ 11.00	\$ 55.00	0.2	Saved correspondence re: reviewing Order proposed by opposing counsel and scheduling a 2.34 telephonic conference; calendared conference.
Grayson J. Moulton	8/16/2019	\$ 132.00	\$ 165.00	0.8	Corresponded with opposing counsel concerning lack of documents pursuant to EDCR 2.34. Scheduled meet and confer for August 27.
Grayson J. Moulton	8/15/2019	\$ 16.50	\$ 55.00	0.3	Corresponded with opposing counsel concerning payment of bills on property.
Grayson J. Moulton	8/14/2019	\$ 11.00	\$ 55.00	0.2	Correspondence with the Court concerning Order from February hearing.
Margaret A. Manning	8/7/2019	\$ 5.50	\$ 55.00	0.1	Met with GRC and discussed discovery requests and need for review.
Darnell Lynch	7/25/2019	\$ -	\$ -	0.4	Reviewed the electronically filed Amended Case Management Order and calendared discovery and trial deadlines and reminders not already calendared. Updated GJM case list with deadlines.
Grayson J. Moulton	7/25/2019	\$ 11.00	\$ 55.00	0.2	Received and reviewed email from Bobby Antee containing
Darnell Lynch	7/23/2019	\$ 7.50	\$ 75.00	0.1	Met with GJM and instructed to calendar reminder re: contact new opposing counsel re respond to request for production or we will file a motion to compel.
Darnell Lynch	7/22/2019	\$ 37.50	\$ 75.00	0.5	Met with GJM re review scheduling order for extended trial and discovery dates; reviewed discovery in the file to determine what documents have been produced by plaintiff so far.
Susan Ward	7/8/2019	\$ 11.00	\$ 55.00	0.2	Received Order Granting Mr. Tilman's Motion to Withdraw as attorney of record; saved to file.
Grayson J. Moulton	7/8/2019	\$ 11.00	\$ 55.00	0.2	Received and reviewed Order Granting Motion to Withdraw as Counsel.
Susan Ward	6/24/2019	\$ 11.00	\$ 55.00	0.2	Received mail from the Court regarding Minutes from the Motion to Withdraw hearing; saved to file.
Susan Ward	6/18/2019	\$ -	\$ -	0.2	Discussed Plaintiffs Motion to withdraw hearing in calendar meeting.
Susan Ward	6/17/2019	\$ 27.50	\$ 55.00	0.5	Received return run with Amended Case Management Order from the Court; saved to file and delivered to GJM for review and calendared any changes.
Grayson J. Moulton	6/17/2019	\$ 11.00	\$ 55.00	0.2	Received and reviewed new scheduling order from the court.
Susan Ward	6/12/2019	\$ 11.00	\$ 55.00	0.2	Received Notice of Entry of Stipulation and Order to Extend Discovery Deadlines and Trial Date; saved to file and calendared changes.
Susan Ward	6/11/2019	\$ 11.00	\$ 55.00	0.2	Received filed copy of Stipulation and Order To Extend Discovery Deadlines and Trial Date; saved to file and calendared new deadlines and Trial.
Sandi Leitner	6/6/2019	\$ -	\$ -	0.1	Discussed in calendar meeting.
Sandi Leitner	5/31/2019	\$ 16.50	\$ 55.00	0.3	Received Stipulation and Order to Extend Discovery Deadlines and Trial Date from GJM; scanned and saved to pleadings file; prepared envelope to mail to opposing counsel; scanned and saved to correspondence file.
Total Billings					\$ 25,367.00

Expenses				
Name	Date	Amount	Description	
Legal Wings	4/9/2020	\$ 100.00	Payment to Legal Wings for delivering the Trial Binder to Opposing Counsel, invoice R-1920453.01.	
Legal Wings	4/9/2020	\$ 74.00	Legal Wings Invoice N. P-1920076.01 for process serving.	
Legal Wings	4/9/2020	\$ 49.00	Legal Wings Invoice N. p-1919832.01 for process service.	
Legal Wings	3/10/2020	\$ 49.00	Legal Wings Invoice #P-1919832.01 for attempting service to Drew Dean Levy.	
USPS - Postage	1/24/2020	\$ 0.50	Mailed letter with \$32.53 check to Person Most Knowledgeable at Valley West Mortgage. Saved it to file.	
Valley West Mortgage	1/16/2020	\$ 32.53	Check for Don Drew Levy for Witness Fees.	
Odyssey File and Serve	10/29/2019	\$ 3.50	Filing fee for Certificate of Service.	
Odyssey File and Serve	10/14/2019	\$ 3.50	Filing fee for Defendant's Updated Financial Disclosures.	
USPS - Postage	9/25/2019	\$ 2.80	Postage fee for mailing Discovery Requests and drafts of Responses and instructional letter to Bobby for review and answering.	
USPS - Postage	5/31/2019	\$ 0.50	To mail the signed Stipulation and Order to opposing counsel.	
Total Expenses		\$	315.33	