

1 LAW OFFICES
2 DANIEL J. OEHLER
3 2001 Highway 95, Suite 15
4 Bullhead City, Arizona 86442
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6 (928) 763-3227 (fax)
7 djolaw10@gmail.com
8 Daniel J. Oehler, Arizona State Bar No.: 002739
9 Attorney for Defendants

6 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
7 IN AND FOR THE COUNTY OF MOHAVE

8	NANCY KNIGHT,)	NO.: CV-2018-04003
9	Plaintiff,)	
10	vs.)	APPLICATION FOR
11	GLEN LUDWIG and PEARL LUDWIG, Trustees)	ATTORNEY'S FEES
12	of THE LUDWIG FAMILY TRUST; FAIRWAY)	AND COSTS PURSUANT
13	CONSTRUCTORS, INC.; MEHDI AZARMI;)	TO ORDER DATED
14	JAMES B. ROBERTS and DONNA M.)	DECEMBER 21, 2023
15	ROBERTS, husband and wife; JOHN DOES 1-10;)	
16	JANE DOES 1-10; ABC CORPORATIONS 1-10;)	
17	and XYZ PARTNERSHIPS 1-10.)	
18	Defendants.)	

17 Defendants, by and through undersigned counsel, hereby submit their Application for
18 Attorney Fees and Costs pursuant to this Court's Order of December 21, 2023, as follows:

19 Defendants request that the Court award to Defendants from Plaintiff \$215,468.50 in
20 reasonable fees plus \$1,786.00 taxable costs for a total request in the amount of \$217,254.50.

21 This Application is supported by the attached **Exhibit A** - Matter History Report for
22 the time period February 2018 through December 2021, **Exhibit B** - Matter History Report
23 for the time period January 2022 through November 2023, **Exhibit C** - Matter History Report
24 for the time period December 2023, the Affidavit of Attorney Fees and the Statement of
25 Costs filed by Daniel J. Oehler on a date even herewith, and this Court's entire verified file
26 in this matter. Under the provisions of the Fee Agreement for Legal Services, the
27 Defendants, GLEN LUDWIG and PEARL LUDWIG, Trustees of THE LUDWIG FAMILY
28 TRUST, FAIRWAY CONSTRUCTORS, INC., and MEHDI AZARMI, and the Law Offices

1 of Daniel J. Oehler agreed to an hourly billing rate of \$325.00 per hour to be charged for
2 legal services rendered, and the Law Offices of Daniel J. Oehler has been consistently paid
3 by the Defendants, excepting only the fees and costs incurred for the current month of
4 December 2023 which have not yet been billed.


5 It should be noted the amounts requested in this Application do not include the fees
6 and costs previously awarded to Defendants and against Plaintiff pursuant to the Judgment
7 for Attorney's Fees and Costs entered by this Court on October 17, 2023, in the total amount
8 of \$6,320.69 (fees \$6,230.25 and costs \$90.44). **Exhibits A, B and C** attached hereto
9 incorporate all fees and costs, including those previously awarded to Defendants against the
10 Plaintiff on October 17, 2023 in the amount of \$6,320.69.

11 For the Court's convenience, Defendants' provide the following breakdown of
12 attorney's fees and costs requested within this Application is as follows:

13	<u>February 2018 through December 2021</u>		
14	Fees (479.55/hrs x \$325.00/hr)	155,853.75	
	Costs	<u>1,463.31</u>	157,317.06
15	<u>January 2022 through November 2023</u>		
16	Fees (199.55/hrs x \$325.00/hr)	64,853.75	
	Costs	<u>382.44</u>	65,236.19
17	<u>December 2023</u>		
18	Fees (3.05/hrs x \$325.00/hr)	991.25	
	Costs	<u>30.69</u>	<u>1,021.94</u>
19	Grand Total All Fees and Costs through December 31, 2023		223,575.19
20	Less Fees and Costs Previously Awarded (that Plaintiff Has Not Paid) (6,230.25 fees (19.17 hrs) plus 90.44 costs)		<u>-6,320.69</u>
21	<u>Total Current Request for Fees and Costs</u>		<u>217,254.50</u>

23 RESPECTFULLY SUBMITTED this 5 day of January, 2024.


24 LAW OFFICES OF DANIEL J. OEHLER

25 
26 Daniel J. Oehler,
27 Attorney for Defendants
28

1 **COPY** of the foregoing emailed
this 5th day of January, 2024, to:

2 Honorable Dale P. Nielson
3 Navajo County Superior Court
4 Post Office Box 668
5 Holbrook, Arizona 86025
6 (928) 524-4220
7 Katelin Lerma, Judicial Assistant
8 kalerma@courts.az.gov

9 Plaintiff
10 Nancy Knight
11 1803 E. Lipan Circle
12 Fort Mohave, Arizona 86426
13 (928) 768-1537
14 nancyknight@frontier.com

15 By: 
16 Patricia L. Emond, Legal Assistant

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Knight v. Ludwig, et al.
Mohave County Superior Court
Docket No. CV-2018-04003

EXHIBIT A

Matter History Report

Report Date: 12/30/2023
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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802X Fairway Constructors Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: CONSTRUCTION LAW: Contracts Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 01-01-2022

Date	T'kpr	Description	Hours	Amount
02/02/2018	DJO	Review of Knight complaint; prepare file memo;	0.40	\$130.00
02/15/2018	DJO	Work on file; review of CC&Rs for "A" and "B"; prepare file memo re Motion to Dismiss;;	0.90	\$292.50
02/16/2018	DJO	Research case law and ARCP Rules 8, 12 & 17;	4.30	\$1,397.50
02/19/2018	DJO	Review of Community Association law; review Restatement of Servitudes draft 1;	2.60	\$845.00
02/20/2018	DJO	Draft 2;	3.10	\$1,007.50
02/23/2018	DJO	Response from Plaintiff; memo to clients;	0.30	\$97.50
02/26/2018	DJO	Phone call with clients; prepare file memo; work on file; research;	1.90	\$617.50
02/27/2018	DJO	Draft Reply to Motion to Dismiss; research Restatement and Foreign Juris cases;	2.75	\$893.75
02/28/2018	DJO	Complete Reinstatement research; prepare file memo; complete Case Law research;	2.10	\$682.50
03/01/2018	DJO	Final form Reply; prepare file memo;	1.60	\$520.00
03/05/2018	DJO	Second response from Plaintiff; memo to clients; ;	0.20	\$65.00
03/08/2018	DJO	Letter to clients; prepare file memo re hearing;	0.10	\$32.50
03/29/2018	DJO	Phone call with Mr. and Mrs. Roberts;	0.15	\$48.75
04/02/2018	DJO	Hearing and oral arguments on Motion to Dismiss in Lake Havasu City;	4.00	\$1,300.00
04/03/2018	DJO	Phone call with Tracy; prepare file memo re Unit B; memo from Court and Court Reporters; memo to Reporter with fees; prepare file memo;	0.60	\$195.00
04/04/2018	DJO	Draft Order re Motion to Dismiss;	1.75	\$568.75
04/06/2018	DJO	Review of Motion for "Stay" from Plaintiff; review of Rules 7, 12(b) & 62 ARCP; prepare file memo;	0.40	\$130.00
04/09/2018	DJO	Draft and final Response to "Stay" motion;	0.50	\$162.50
04/10/2018	DJO	Final Order of Dismissal and Findings; preparation of Affidavit of Fees & Costs; preparation of Notice of Lodging;	0.80	\$260.00
04/12/2018	DJO	Record search -- ownership within Tract 4076B re defendants; phone call with Southwest - Ann Petit; review of MLS sales;	1.30	\$422.50
04/19/2018	DJO	Review of Plaintiff's filings; prepare file memo;	0.30	\$97.50
04/20/2018	DJO	Draft and final Objection to Plaintiff's findings; Order;	0.70	\$227.50

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04/23/2018	DJO	Fact research re 4163 abandonment of 4076B setback status on 4163 of Knight residence re parcel KK and violation research on estoppel and clean hands issue re Knight residence violations;	1.60	\$520.00
05/02/2018	DJO	Motion from Knight; memo to client; memo to County Attorney; prepare file memo;	0.50	\$162.50
05/07/2018	DJO	Work on Motion to Amend; letter from Mohave County Attorney;	0.30	\$97.50
05/11/2018	DJO	Phone call with Mohave County Attorney; prepare file memo; legal research; draft Objection to Motion to Amend;	4.75	\$1,543.75
05/14/2018	DJO	2nd draft of Motion to Objection; final;	0.75	\$243.75
05/18/2018	DJO	Response to Objection re amendment to complaint;	0.50	\$162.50
05/21/2018	DJO	Letter to client; letter to County Attorney; prepare file memo;	0.20	\$65.00
05/21/2018	DJO	Knight's proposed Order; prepare file memo;	0.15	\$48.75
06/12/2018	DJO	Minute Entry and Order from Court;	0.25	\$81.25
06/13/2018	DJO	Draft Answer re Count II; prepare file memo; ltr letter to U.S. Southwest; review of Arizona Corporation Commission records re Fairway;	2.40	\$780.00
06/14/2018	DJO	Second draft Answer; letter revisions;	0.60	\$195.00
06/18/2018	DJO	Listing data from US Southwest; work on file;	0.40	\$130.00
06/19/2018	DJO	Phone call with client; documents from client re Motion for Summary Judgment research; letter to Ms. Knight;	2.60	\$845.00
06/20/2018	DJO	Pleading from Plaintiff; research patio issue; phone call with Fairway; phone call with Medhi; prepare file memo; data from Fairway;	2.80	\$910.00
06/25/2018	DJO	Demand letter from Plaintiff; prepare file memo; phone call with Fairway re Notices and Demands, case law and restatement of servitude;	1.75	\$568.75
06/26/2018	DJO	Phone call with client re abandonment issue re CC&Rs; prepare file memo; research waiver/abandonment issues re "set-back issue, walls, and signs;	3.40	\$1,105.00
06/27/2018	DJO	Review of additional case law, restatement cases and Arizona Community Association law; phone call with client;	1.30	\$422.50
06/28/2018	DJO	Review of setback violation photos; prepare file memo; letter from Knight; draft abandonment points; review of CC&Rs re abandoned issue;	2.25	\$731.25
07/01/2018	DJO	Ruling from Court re Rule 59 motion; review of Plaintiff's Rule 59 motion; phone call with Clerk re copy of Rult 59; memo to client;	1.10	\$357.50

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07/06/2018	DJO	Letter from Knight to Court; 4076 B lot information from client; memo to Court; phone call with client re status and inventory of lots;;	2.75	\$893.75
07/09/2018	DJO	Pleading from Mrs. Knight; prepare file memo; memo to client with documents;	0.30	\$97.50
07/10/2018	DJO	Reports from client re lots and setback issues; reply re Motion to Amend; prepare file memo; memo to client;	0.30	\$97.50
07/11/2018	DJO	Review of Zoning Ordinance re SDR and setback/patio issue;	0.25	\$81.25
07/27/2018	DJO	Letter from Ms. Knight re Disclosure; letter to Ms. Knight;	0.20	\$65.00
07/30/2018	DJO	Disclosure work; phone call with Ralph Bare; letter to client; phone call with Angelo; phone call with Larry Wood; draft second Motion to Dismiss; final form Title 33 Motion; initial Disclosure from Plaintiff; phone call with Ann Pettit;	2.60	\$845.00
07/31/2018	DJO	Reply from Plaintiff re second Motion to Dismiss; legal research and draft Reply; final form;	1.70	\$552.50
8/3/2018	DJO	Final revisions and final form Reply to Motion to Dismiss; motion from Plaintiff re Disclosure;	1.70	\$552.50
08/15/2018	DJO	Draft Response - Motion to Compel / Motion to Extend Disclosure; final formotion Motion to Compel / Motion to Extend Disclosure;	1.25	\$406.25
08/27/2018	DJO	Motion from Plaintiff for Court clarification;	0.25	\$81.25
09/24/2018	DJO	Work on Disclosure; prepare file memo;	1.90	\$617.50
09/25/2018	DJO	Work on Disclosure;	1.70	\$552.50
09/27/2018	DJO	Work on Disclosure; prepare file memo re legal claims setforth in Disclosure with facts and law;	2.40	\$780.00
09/28/2018	DJO	Letter from and letter to Mrs. Knight;	0.15	\$48.75
09/29/2018	DJO	Letter from Mrs. Knight re Joint Report and scheduling and letter from Mrs. Knight for Defendants;	0.25	\$81.25
10/04/2018	DJO	Letter to client;	0.25	\$81.25
10/05/2018	DJO	Letter from Knight; preparation of draft Joint Report; draft Scheduling Order; letter to Knight with report and order;	0.90	\$292.50
10/10/2018	DJO	Letter to Mrs. Knight with draft Joint Report and Scheduling Order;	0.25	\$81.25
10/11/2018	DJO	Letter from Knight re Joint Report and Scheduling Order; prepare file memo; letter to Knight;	0.25	\$81.25
10/31/2018	DJO	Amend Joint Report and Scheduling Order; memo to Ms. Knight; prepare file memo;	1.20	\$390.00

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11/01/2018	DJO	Request to Court re Motion for reconciliation research and two drafts;	2.75	\$893.75
11/02/2018	DJO	Letter to Knight re Joint Report and Scheduled Order; final form request to Court re Motion to Reconsider;	0.40	\$130.00
11/05/2018	DJO	Letter to Mrs. Knight; four amendments to Scheduled Order and Joint Report;	0.30	\$97.50
11/14/2018	DJO	Motion for Injunction; 15h revision from Knight re Joint report; memo to client;	0.25	\$81.25
11/15/2018	DJO	Draft response to third Motion to Amend Complaint/Motion for Reconsideration; Research legal and county records;	4.25	\$1,381.25
11/16/2018	DJO	Final form Response and exhibits;	1.40	\$455.00
11/19/2018	DJO	Reply to Objection and Motion to Amend; revised Joint Report and Scheduled Order from Plaintiff; meet and confer with Plaintiff; final Joint Report and third Motion to certificate; Plaintiff's direct contact with Defendants should cease.	3.75	\$1,218.75
11/21/2018	DJO	Review of Injunction Motion; review of Rule 65 and Title 12-1801; prepare file memo re Response/Answer;	0.50	\$162.50
11/27/2018	DJO	Supplemental Disclosure; prepare file memo;	0.30	\$97.50
11/28/2018	DJO	Phone call with Medhi; prepare file memo; phone call with US Southwest; prepare file memo; work on TRO;	0.75	\$243.75
11/30/2018	DJO	Objection to Preliminary Injunction; draft and research; prepare file memo; memo from client;	2.90	\$942.50
12/03/2018	DJO	Second draft and final objection re preliminary;	1.80	\$585.00
12/04/2018	DJO	Letter from Knight; memo to Knight;	0.15	\$48.75
12/10/2018	DJO	Memo to client; with Objection to Injunction; letter from Mrs. Knight; prepare file memo;	0.25	\$81.25
12/11/2018	DJO	Ruling from Court on third Motion to Amend; prepare file memo; memo to client;	0.20	\$65.00
12/17/2018	DJO	Preparation for Court hearing re injunctin issues; memo to client; preparation for hearing;	1.00	\$325.00
12/19/2018	DJO	Motion for Declaratory Judgment from Plaintiff; review of statutes; memo to client; phone call with client; prepare file memo;	0.70	\$227.50
01/03/2019	DJO	Research re Disclaratory Judgment; first draft of Response;	3.25	\$1,056.25
01/04/2019	DJO	Final form and amendments to Response;	1.40	\$455.00
01/08/2019	DJO	Reply fromotion Plaintiff on Declaratory Judgment Motion; memo to client;	0.30	\$97.50
1/18/2019	DJO	Memo to client;	0.00	No Charge
02/21/2019	DJO	Status conference with Court; prepare file memo; memo to client;	0.40	\$130.00

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03/08/2019	DJO	Notice and Ruling re Declaratory Judgment;	0.15	\$48.75
03/18/2019	DJO	Letter from Plaintiff; memo to client; prepare file memo;	0.30	\$97.50
04/04/2019	DJO	Transcript from Reporter; memo to client;	0.15	\$48.75
04/04/2019	DJO	Memo to and memo from Court Reporter; prepare file memo;	0.15	\$48.75
04/11/2019	DJO	Review file re status; attend Status Conference; prepare file memo and calendaring;	0.60	\$195.00
04/29/2019	DJO	Review of new Motion to Reconsider re Count I; review all Plaintiff's Motions to Reconsider;	0.75	\$243.75
05/06/2019	DJO	Work on three pending Plaintiff motions; research;	2.75	\$893.75
05/07/2019	DJO	Work on file re pending motions and Motion for Summary Judgment; phone call with Medhi re experts, Stephan, Morse, Angelo and Varner;	1.50	\$487.50
05/08/2019	DJO	Draft response to "Signage Declaratory Judgment" motion;	2.75	\$893.75
05/09/2019	DJO	Second draft;	1.40	\$455.00
05/10/2019	DJO	Final form Declaratory Judgment response; final form two motions in response to reconsideration;	1.40	\$455.00
05/14/2019	DJO	Three pleadings from Knight; memo to client;	0.40	\$130.00
05/23/2019	DJO	Work on Disclosure; phone call with client; message to Harris; letter from Plaintiff; prepare file memo;	1.00	\$325.00
05/24/2019	DJO	Work on Disclosure Supplements and Amendments; phone call with Harris (2); phone call with client; prepare file memo; memo to Harris and client;	2.40	\$780.00
06/05/2019	DJO	Phone call with David Fyke of Chicago Title re Plaintiff, CC&R requests; prepare file memo;	0.50	\$162.50
06/07/2019	DJO	Review of Plaintiff's second Disclosure and Exhibits; letter to Medhi; prepare file memo; phone call with Chris Ballard's office re documents;	2.25	\$731.25
06/11/2019	DJO	Work on Disclosures and Plaintiff's exhibits; conference with Chris Ballard; email to and from Ballard;	2.40	\$780.00
06/13/2019	DJO	Notices and Orders on pending motions; prepare file memo;	0.20	\$65.00
06/14/2019	DJO	Phone call with Mediator re status;	0.25	\$81.25
06/17/2019	DJO	Status Conference with Court; prepare file memo; memo from Clerk;	0.60	\$195.00
06/20/2019	DJO	Motion to Amend Complaint and amended Complaint; memo to client;	0.75	\$243.75
06/26/2019	DJO	Work on Motion to Amend; phone call with client; prepare file memo;	0.80	\$260.00

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06/27/2019	DJO	Phone call with client; prepare file memo; memo from client and Plaintiff;	0.40	\$130.00
06/28/2019	DJO	Work on Response to Motion to Amend; phone call with client; conference with client and Neil Kukreja; prepare file memo re Affidavit;	2.70	\$877.50
07/01/2019	DJO	Work on 5th Opposition to Amend; prepare file memo;	6.40	\$2,080.00
07/02/2019	DJO	Final form Opposition to Amend;	2.25	\$731.25
07/03/2019	DJO	Phone call with Artie L; prepare file memo;	0.15	\$48.75
07/09/2019	DJO	Review of Reply and Reply exhibits; prepare file memo;	0.50	\$162.50
07/22/2019	DJO	Memo from Medhi; prepare file memo re Santa Fe/Fairway Estates;	0.20	\$65.00
08/05/2019	DJO	Review of supplements and correspondence and exhibits (7 transmittals);	1.25	\$406.25
08/06/2019	DJO	Complete exhibit review and supplemental disclosures; memo to client; prepare file memo; phone call with County Attorney;	1.75	\$568.75
08/14/2019	DJO	Memo from client re "next door"; review of next door chats; memo to Mr. Lauxman; phone call with Tracy re 4076B residents;	0.80	\$260.00
08/15/2019	DJO	Notice from Court; phone call with Tracy (2); memo from Tracy; draft generic owner affidavit; letter to Tracy; phone call with Cutler; phone call with Mongeau re affidavits; phone call with Lauxman; conference with Mike Bell;	3.75	\$1,218.75
08/16/2019	DJO	Letter from Ardie Lauxman and Michael Bell; work on file;	0.60	\$195.00
08/18/2019	DJO	Phone call with Tracy; review of ownership of B tract list; memo to Ann Pettit re owners; phone call with Al Patch; memo re Dr. Larson and Dr. Hendrix B-tract ownership; memo from and memo to Doug McKee;	1.50	\$487.50
08/19/2019	DJO	Conference with Doug McKee re home built by McKees; phone call with Tracy and Medhi; phone call with Judy Porter re 1994 build; complete questionnaire;	3.30	\$1,072.50
08/20/2019	DJO	Memo from Doug McKee; work on CC&R violation categories; prepare file memo; phone call with Tracy and Mehdi;	2.60	\$845.00
08/21/2019	DJO	Draft Affidavits for Corner Stone and ARQ-Engineering, Inc.; phone call with Atty. Elias re Edwards;	1.40	\$455.00
08/22/2019	DJO	Phone call with ARQ-Engineering, Inc.; review of ARQ-Engineering, Inc. file; review of Chase/Knight filings re Knight CC&R violations -- past and present;	0.80	\$260.00

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08/23/2019	DJO	Review file status re Court required Status Conference; attend (telephonically) status conference; memo from client and ARQ-Engineering, Inc.; phone call with client; work on file;	1.50	\$487.50
08/24/2019	DJO	Work on Facts, Affidavits and law re Motion for Summary Judgment;	3.10	\$1,007.50
08/25/2019	DJO	Work on facts, affidavits and law re Motion for Summary Judgment;	2.25	\$731.25
08/26/2019	DJO	Work on facts, affidavits and law re Motion for Summary Judgment; phone call with client; Recorder research; draft Mr. Kukreta's affidavit;	1.75	\$568.75
08/27/2019	DJO	Phone call with Development Services re signage--Scott Holt; review of Plaintiff's most recent pleading; prepare file memo; phone call with Ann Pettit; prepare file memo; research Kukreta's ownership history;	2.75	\$893.75
08/28/2019	DJO	Work on file; review of Supreme Court of United States Reed sign case re Mohave County ordinance;	0.75	\$243.75
08/29/2019	DJO	Letter to client with 4076A and 4076B reports with lot totals; phone call with Tracy and Mehdi; phone call with County Attorney; public record request; phone call with client; work on Affidavits;	2.60	\$845.00
08/30/2019	DJO	Phone call with Mohave County; memo to Development Services; letter from Plaintiff re Scheduling Order and Response;	1.60	\$520.00
09/09/2019	DJO	Review of miscellaneous county permits from client; work on Motion; phone call with client;	0.90	\$292.50
09/10/2019	DJO	Review of Rule 7 and prepare file memo; re Judge Carlisle's handling of Rule 59 vs. Rule 7; work on Summary Judgment;	0.90	\$292.50
09/10/2019	DJO	Phone call with Development Services; prepare file memo;	0.30	\$97.50
09/11/2019	DJO	Review of County documentation; pfm;	2.60	\$845.00
09/12/2019	DJO	Meet with Tracy Weisz et al re CC&R violation index; prepare file memo;	0.80	\$260.00
09/17/2019	DJO	Letter from Knight re Mohave County Demands; prepare file memo; phone call with client; letter to client; phone call with USSW (Ann Petit); letter to USSW; meet with R. Esplin;	0.90	\$292.50
09/17/2019	DJO	Conference with Mohave County Attorney; prepare file memo;	0.30	\$97.50
09/18/2019	DJO	Letter from Plaintiff; review of correspondence with Judge Chavez; prepare file memo;	0.20	\$65.00
09/19/2019	DJO	Message to ARQ-Engineering, Inc. and Edwards re inspection; phone call with Mr. Edwards; prepare file memo; site visit; conference with ARQ-Engineering, Inc.;	1.30	\$422.50

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09/19/2019	DJO	CC&Rs to ARQ-Engineering, Inc.; photos to ARQ-Engineering, Inc.; draft Affidavit for RLM; phone call re fencing measurements;	2.60	\$845.00
09/20/2019	DJO	Phone call with ARQ-Engineering, Inc. (2); memo (2) to ARQ-Engineering, Inc.; 2nd and 3rd amendment of Affidavit; prepare file memo; complete drafts 2 & 3; memo to client;	2.75	\$893.75
09/23/2019	DJO	Phone call with Greg Green - Desert Glass; preparation of Desert Glass affidavit; draft Eric's Affidavit; draft Grand Canyon Affidavit; research Court of Appeals 2019; prepare file memo; phone call with Mehdi;	2.40	\$780.00
09/24/2019	DJO	Memo from Plaintiff re Mediator; draft and final Pettit Affidavits; conference with Doug McKee; phone call with ARQ-Engineering, Inc.;	2.80	\$910.00
09/25/2019	DJO	Work on USSW Affidavits (2nd draft); new case research on law issue;	2.90	\$942.50
09/26/2019	DJO	Memo to Plaintiff; redraft Neil's Affidavit; memo to client re USSW, Neil and Cornerstone Affidavits;	2.30	\$747.50
09/27/2019	DJO	Letter from Knight; prepare file memo to client; phone call with client; letter to Neil; letter to Ann; work on Tracey Affidavit;	2.00	\$650.00
09/28/2019	DJO	Work on Tracey and Stoneman Affidavit; new motion from Plaintiff; work on Hendrix and Judy Porter Affidavits; prepare file memo re mandatory rear yard fence;;	3.20	\$1,040.00
09/30/2019	DJO	Work on Summary Judgment and Affidavits; phone call with client and Tracey; record search on Hendrix and Porter; memo to and memo from Neil;	1.70	\$552.50
10/01/2019	DJO	Work on Affidavits; phone call with Tracey; research;	1.60	\$520.00
10/02/2019	DJO	Phone call with Eric Stephen re Affidavit; phone call with Ann Pettit; work on Tracy's Affidavit;	1.80	\$585.00
10/04/2019	DJO	Letter to US Southwest re draft Affidavit; phone call with client;	0.75	\$243.75
10/07/2019	DJO	Final form Desert Glass affidavit; phone call with Mr. Green; work on Ludwig affidavit; draft and second draft; research Department of Real Estate records;	1.80	\$585.00
10/08/2019	DJO	Letter to Mehdi; phone call with Mehdi; prepare file memo;	0.30	\$97.50
10/09/2019	DJO	Work on file; message to client; research Mohve County land use regulations re 1990's;	0.75	\$243.75
10/10/2019	DJO	Work on legal and fact provisions; letter to Ann Pettit re Affidavit; prepare file memo; phone call with developer re abandonment;	1.25	\$406.25
10/11/2019	DJO	Letter to Eric; memo to ERic; phone call with Mehdi; case research; letter from Mehdi with draft amendments;	1.30	\$422.50

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Matter Number: 18B1 adv. KNIGHT
Matter Type: CONSTRUCTION LAW: Contracts Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 01-01-2022

10/12/2019	DJO	Dictation -- Summary Judgment;	4.25	\$1,381.25
10/12/2019	DJO	Begin draft of Fact Statement; beg draft of Legal (The Law) Statement re Motion for Summary Judgment;	4.70	\$1,527.50
10/14/2019	DJO	Amend to Cornerstone office; phone call with client (3); amend to USSW Affidavit; memo to Cornerstone and USSW and client;	6.75	\$2,193.75
10/15/2019	DJO	Work on USSW and Weisz Affidavits; Recorder research; letter from Mrs. Knight; phone call with client; draft to client;	5.40	\$1,755.00
10/29/2019	DJO	Review of Knight's new Motions re amendments to reconsideration; prepare file memo; review of Louisiana Law review re restriction motion;	0.90	\$292.50
10/30/2019	DJO	MeMinute Order re Affidavit status; memo to Ann Pettit;	0.25	\$81.25
10/31/2019	DJO	Ruling from Court re three pending motions; memo to client; work on Affidavits; phone call with Tracey;	1.75	\$568.75
11/01/2019	DJO	Work on file; review of Tracy update; second draft of Fact memorandum;	3.40	\$1,105.00
11/03/2019	DJO	Work on Affidavit and Fact Summary for Motion for Summary Judgment; prepare file memo; memo re Cornerstone affidavit;	1.75	\$568.75
11/05/2019	DJO	Second draft -- Mehdi;s Affidavit; second draft of Fact and Legal background segments of Motion fo Summary Judgment; phone call with client re County Zoning Ordinance;	2.75	\$893.75
11/06/2019	DJO	Work on Affidavit and Motion;	1.15	\$373.75
11/07/2019	DJO	Status check -- Desert Lakes Development, LP -- Delaware; work on fact memo re question before Court; prepare file memo; memo to client;	1.80	\$585.00
11/08/2019	DJO	Phone call with client; review of Affidavit and exhibit status; review of Mohave County records re cross-section of house square footage records; work on Motion;	2.75	\$893.75
11/09/2019	DJO	Work on Motion for Summary Judgment;; facts and law;	4.30	\$1,397.50
11/10/2019	DJO	Work on final draft of Fact Motion; preparation of draft and final ARCP Rule 7 Motion and Order;	3.90	\$1,267.50
11/11/2019	DJO	Phone call with McKee; Assesor research; work on Statment of Facts; memo to client; cross verify statement of case and facts; second law draft;	4.25	\$1,381.25
11/12/2019	DJO	Motion from Plaintiff (2); review of exhibits; phone call with Tracy; update Statement of the Law, cases and Restatement of Law;	3.60	\$1,170.00
11/22/2019	DJO	Court Rulings; review of Motion fo Clarification; prepare file memo;	0.40	\$130.00

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11/23/2019	DJO	Research Mohave County Subdivision Regulations; review of June 2018 Arizona Court Rulings; begin draft of Clarification Memo;	4.60	\$1,495.00
11/24/2019	DJO	Work on draft; review of Mohave County Subdivision Recorded tracts;	3.75	\$1,218.75
11/25/2019	DJO	1st draft revisions; prepare file memo;	4.00	\$1,300.00
11/26/2019	DJO	Final revisions and exhibits;	3.80	\$1,235.00
11/26/2019	DJO	Review of Plaintiff's Motion for Partial Summary Judgment and exhibits; memo to client;	0.30	\$97.50
11/27/2019	DJO	Review of exhibits and prepare file memo; re Plaintiff's partial Summary Judgment Motion; phone call with Tracy re complete Building Permit Application; prepare file memo;	0.70	\$227.50
11/29/2019	DJO	Work on Summary Judgment and Statement of Facts;	2.25	\$731.25
12/02/2019	DJO	Work on Summary Judgment;	3.40	\$1,105.00
12/03/2019	DJO	Work on Summary Judgment; review of Reply to Clarification Response;	2.80	\$910.00
12/04/2019	DJO	Work on Indexing and correlation of Statement of Facts within Motion; research re Plaintiff's case law authority; status conference with Court;	1.90	\$617.50
12/05/2019	DJO	Final Statement of Facts and coalate paragraphs; review of Registrar of Contractors Complaint;	2.80	\$910.00
12/06/2019	DJO	Final coalate Statement of Facts with Motion and Afficavit; verify cites;	6.30	\$2,047.50
12/06/2019	DJO	Letter from Mrs. Knight; prepare file memo;	0.15	\$48.75
12/12/2019	DJO	Work on Request for Production of Documents; prepare file memo;	0.80	\$260.00
12/13/2019	DJO	Final Request for Production;	0.25	\$81.25
12/16/2019	DJO	Work on Supplemental Affidavit; prepare file memo;	0.40	\$130.00
12/17/2019	DJO	Communitation from Plaintiff to Court Clerk and Response; memo to client; work on Supplement to Motion for Summary Judgment;	0.30	\$97.50
12/17/2019	DJO	More pleading/motions from Plaintiff; review of June motion and amendments; review of July motion, visa vie October Court ruling; prepare file memo;	0.90	\$292.50
12/18/2019	DJO	Memo to client; final proposed supplemental affidavit re Motion for Summary Judgment reply;	0.70	\$227.50
12/20/2019	DJO	Draft response to Motion for Partial Summary Judgment;	2.25	\$731.25
12/21/2019	DJO	Second draft response to Motion for Partial Summary Judgment;	3.00	\$975.00
12/23/2019	DJO	Final Response to Partial Summary Judgment;	1.15	\$373.75
12/30/2019	DJO	Reply to defendant's Response to Plaintiff's Motion for partial Summary Judgment;	0.75	\$243.75

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12/30/2019	DJO	Response from Plaintiff to Defendant's Motion for Summary Judgment; begin review of attachments;	2.75	\$893.75
12/30/2019	DJO	Review of Plaintiff's production of documents (partial)	1.30	\$422.50
12/31/2019	DJO	Complete review of production; letter to client; complete review of of Plaintiff's Response (448 pages);	2.80	\$910.00
12/31/2019	DJO	Work on Subpoena re Redmon; draft Request for Admissions;	0.60	\$195.00
01/06/2020	DJO	Draft memo re reply to reponse to Motion for Summary Judgment; letter to Plaintiff re Request to Produce; prepare file memo;	0.70	\$227.50
01/09/2020	DJO	Work on reply notes;	0.80	\$260.00
01/10/2020	DJO	Work on Reply; prepare file memo; phone call with Affiant; phone call with client; revise Supplemental Affidavit;	1.60	\$520.00
01/12/2020	DJO	Second draft of Reply to Response Motion for Summary Judgment;	2.90	\$942.50
01/13/2020	DJO	Final draft and final form Reply; letter from and documents from Plaintiff (+/- 250 pages);	2.30	\$747.50
01/14/2020	DJO	Review of Responses to Request for Production; prepare file memo;	1.15	\$373.75
01/16/2020	DJO	Review of Disclosure from Plaintiff;	1.15	\$373.75
01/17/2020	DJO	Review of Disclosure from Plaintiff +/- pages (49 emails);	0.75	\$243.75
01/17/2020	DJO	Phone call with Doug McKee re Knight letters; conference with Doug McKee;	0.25	\$81.25
01/23/2020	DJO	Memo from Grand Canyon; locate and reproduce McKee communications with Response to Motion for Summary Judgment and letters; phone call with McKee;	0.70	\$227.50
01/31/2020	DJO	Letter from Plaintiff; prepare file memo; memo from Clerk; memo to client;	0.25	\$81.25
02/17/2020	DJO	Work on admissions;	0.20	\$65.00
02/20/2020	DJO	Final form Request for Admissions;	0.15	\$48.75
02/24/2020	DJO	Ruling from Court; Motion from Plaintiff to compel Defendant to amend reply; memo to client;	1.25	\$406.25
02/25/2020	DJO	Ruling from Court; phone call with client; prepare file memo re status;	0.30	\$97.50
02/28/2020	DJO	Review of Plaintiff's Motion for Clarification (4 pages with exhibits); review of Plaintiff's Motion for Reconsideration (14 pages with 35 pages of exhibits);	1.10	\$357.50
03/09/2020	DJO	Memo from Plaintiff; correction memo re admissions;	0.00	No Charge

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03/10/2020	DJO	Review of Plaintiff's two most recent Motions; review of Arizona Rules of Civil Procedure; prepare file memo; draft Response; prepare file memo;	1.00	Misc No Chrg
03/10/2020	DJO	Review of Plaintiff's two most recent motions; review of ARCP; prepare file memo; draft response; prepare file memo;	1.00	\$325.00
03/11/2020	DJO	Final form Response;	0.20	\$65.00
03/11/2020	DJO	Final form Response;	0.20	\$65.00
03/12/2020	DJO	Motion to Set Aside re fraud (65 pages); prepare file memo; memo to client;	1.30	\$422.50
03/12/2020	DJO	Motion to Set ASide re fraud (65 pages); prepare file memo; memo to client;	1.30	\$422.50
03/16/2020	DJO	Second replies re Plaintiff's pending new motions; prepare file memo; memo to client;	0.25	\$81.25
03/17/2020	DJO	Memo to client; prepare file memo;	0.15	\$48.75
03/17/2020	DJO	Review of ARCP re motion; legal research;	0.30	\$97.50
03/19/2020	DJO	Rules and case law research;	1.40	\$455.00
03/20/2020	DJO	Rules and case research re set aside and fraud;	1.25	\$406.25
03/22/2020	DJO	Research Rule 60; initial draft of Response;	4.25	\$1,381.25
03/24/2020	DJO	Work on file Motion to Strike; response draft Motion for Rule 7 determination; pppo Affidavit; phone call with Mohave County Attorney's staff office; letter to and draft Affidavit to County; Planning regulations review; memo from Plaintiff;	3.90	\$1,267.50
03/25/2020	DJO	Final Rule 7 request; pleading from Plaintiff re various 4076 A, B, C, D etc. parcels and lots; prepare file memo;	0.40	\$130.00
03/26/2020	DJO	Prepare file memo re hearing; memo from Plaintiff to Judicial Assistant; memo to client with Plaintiff's Motion to add to Summary Judgment Motion;;	0.25	\$81.25
03/27/2020	DJO	Memo from Plaintiff to Court; prepare file memo re Defendant's personal appearance at hearing; phone call with client (2) re COVID 19 continuance; Minute Order from Court; legal research; memo to client; research Rule 19;	1.80	\$585.00
04/06/2020	DJO	Pleadings from Knight; phone call with County re Affidavit; prepare file memo;	0.75	\$243.75
04/07/2020	DJO	Review of Plaintiff's writings; phone call with Ryan; research Anderson memo re Assessor Map and GIC; phone call with Bob; letter to Bob; prepare file memo;	1.30	\$422.50

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04/08/2020	DJO	Memo re bar graph depiction of CC&R violations; review of with Tracy survey data; prepare file memo re Motion for Summary Judgment presentation;	0.75	\$243.75	0
04/09/2020	DJO	Letter to client; prepare file memo;	0.15	\$48.75	5
04/10/2020	DJO	Phone call with client (2); memo to and memo from client; message to Medhi Azarmi; prepare file memo; memo from Plaintiff;	0.60	\$195.00	0
04/10/2020	DJO	Motin for Reconsideration re corrections from Plaintiff; memo to client;	0.20	\$65.00	0
04/13/2020	DJO	Discovery requests from Plaintiff / Request for Production; phone call with Atty. Anderson re "A" tract and Knight correspondence;	0.90	\$292.50	0
04/15/2020	DJO	Letter from Plaintiff to Court with demands; memo from Judge Jansen's Juticial Assistant; phone call with client;	0.40	\$130.00	0
04/16/2020	DJO	Work on file re Motion for Summary Judgment; work on bar graph;	1.25	\$406.25	0
04/17/2020	DJO	Phone call with client; worcontract on Motion for Summary Judgment; letter from County Attorney re Ballard affidavit; prepare file memo;	0.60	\$195.00	5
04/20/2020	DJO	Miscellaneous phone calls with Scott Seabury; prepare file memo re card/photo display;	0.30	\$97.50	5
04/27/2020	DJO	Work on Motion for Summary Judgment presentation data; conference with client;	1.15	\$373.75	0
04/28/2020	DJO	Work on charts; prepare file memo;	0.60	\$195.00	0
04/29/2020	DJO	Work on file and charts; phone call with clients;	0.30	\$97.50	0
04/30/2020	DJO	Letter from Plaintiff's Clerk; prepare file memo; review of Title 9 re "Cities and Towns"; letter to County Attorney with documents; prepare file memo;	0.75	\$243.75	5
04/30/2020	DJO	Work on Affidavit re "Preliminary Plat";	0.30	\$97.50	5
05/01/2020	DJO	Preparation for Statis Cpmferemce; prepare file memo;	0.60	\$195.00	5
05/04/2020	DJO	Status Hearing - Kingman;	1.50	\$487.50	5
05/05/2020	DJO	Motion from Plaintiff re issue arguments; prepare file memo; memo to client;	0.40	\$130.00	0
05/06/2020	DJO	Phone call with ARQ-Engineering, Inc. re plat plan; work on exhibits; prepare file memo; preparation for arguments;	3.40	\$1,105.00	0
05/08/2020	DJO	4th Disclosure and memorandum from Plaintiff; retrieve and review case law;	1.25	\$406.25	0
05/08/2020	DJO	Hearing preparation; prepare file memo;	4.80	\$1,560.00	0
05/09/2020	DJO	Hearing preparation;	5.25	\$1,706.25	5
05/10/2020	DJO	Hearing preparaton;	6.00	\$1,950.00	0

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09/08/2020	DJO	Review of Motion to Amend; memo to client; prepare file memo;	0.70	\$227.50
09/08/2020	DJO	Phone call with client;	0.10	No Charge
09/17/2020	DJO	Phone call with Atty. Esplin; prepare file memo; memo to Atty. Taylor;	0.30	\$97.50
09/17/2020	DJO	Review of Motion and amended Complaint; research partial draft Objection;	2.90	\$942.50
09/18/2020	DJO	Message from and to Atty. Taylor; draft Objection;	1.75	\$568.75
09/20/2020	DJO	Work on Objection to Amend;	2.30	\$747.50
09/21/2020	DJO	Work on Objection to amend; final draft and final form;	6.40	\$2,080.00
09/22/2020	DJO	Phone call with Atty. Taylor; email Motion and proposed Amended Complaint to Atty. Esplin and Atty. Taylor;	0.20	\$65.00
09/23/2020	DJO	Review of Reply; memo to client;	0.20	\$65.00
09/28/2020	DJO	Prepare for Court hearing re Motion to Amend and Outstanding Discovery re Plaintiff for Request for Production and amendment;	1.10	\$357.50
09/29/2020	DJO	Prepare for hearing on Plaintiff's Request for D; Motion to Amend; Response to Motion to Extend Request for Production and ARS 12-821 re proposed amended Complaint; prepare file memo; attend hearing -- Zoom conference;	2.90	\$942.50
10/15/2020	DJO	Prepare for Oral Arguments re Motion to Amend and Request for Production issue;	3.40	\$1,105.00
10/16/2020	DJO	Hearing and Arguments to Amend Complaint and preparation for hearing and arguments; review of Title 12 re Mohave County as Defendant;	2.25	\$731.25
10/20/2020	DJO	Status conference with client; prepare file memo;	1.00	\$325.00
12/07/2020	DJO	Conference with Mike Murphy; letter to Murphy with documents; prepare file memo re Atty. Coughlin;	1.10	\$357.50
12/14/2020	DJO	Conference with Atty. M. Murphy; prepare file memo;	0.40	\$130.00
12/15/2020	DJO	Memo from Court and memo to client; review of Plaintiff's web documents;	0.15	\$48.75
12/16/2020	DJO	Letter to Atty. Coughlin; phone call with client; prepare file memo;	0.30	\$97.50
01/04/2021	DJO	Letter to Atty. Coughlin; text from Atty. Coughlin and response;	0.20	\$65.00
01/05/2021	DJO	Conference with Atty. Coughlin; prepare file memo; memo to client;	0.75	\$243.75
01/07/2021	DJO	Attorney Mike Murphy, Esq. file, fact and law review;	0.00	No Charge

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01/11/2021	DJO	Status conference with Court and Plaintiff's attorney; prepare file memo; letter to client re conference issues and next conference;	0.70	\$227.50
03/19/2021	DJO	Review of memos from Atty. Coughlin; letter to client; Petition Atty. Coughlin;	0.75	\$243.75
03/22/2021	DJO	Prepare file memo; phone call with Mehdi; attend status conference;	0.60	\$195.00
04/12/2021	DJO	Review of Motion to Amend and amended Complaint; prepare file memo; memo to client;	0.40	\$130.00
04/13/2021	DJO	Research case law and prior responses re amendment;	0.80	\$260.00
04/14/2021	DJO	Recorder record search re new named Defendant's;	0.40	\$130.00
04/15/2021	DJO	Phone call with client; prepare file memo re 11 new Defendants;	0.50	\$162.50
04/19/2021	DJO	Review of cases re Rule 19 and internal construction since 2018; review of E. Stephan Affidavit;	2.25	\$731.25
04/20/2021	DJO	Phone call with client re new home construction; review of Mohave County records; message and phone call-- McKee; email from McKee; phone call with R. King; phone call with Tracy;	1.30	\$422.50
04/21/2021	DJO	Draft Objection to Amendment; prepare file memo;	1.30	\$422.50
04/22/2021	DJO	Second draft;	0.40	\$130.00
04/25/2021	DJO	Final review and amendments; prepare file memo re exhibits;	0.25	\$81.25
05/09/2021	DJO	Hearing preparation; review of rules and cases; prepare file memo;	0.80	\$260.00
05/10/2021	DJO	Hearing on Motion to Amend; prepare file memo;	0.75	\$243.75
05/20/2021	DJO	Third Disclosure; prepare file memo; Affidavit;	0.30	\$97.50
06/14/2021	DJO	Review of last hearing Minute Entry; review of filing docket;	0.25	\$81.25
06/15/2021	DJO	Attend Court status conference;	0.30	\$97.50
07/26/2021	DJO	File review re update on Complaint;	0.20	\$65.00
07/27/2021	DJO	Status conference re amended Complaint; prepare file memo;	0.25	\$81.25
08/05/2021	DJO	Draft letter to Atty. Coughlin; prepare file memo;	0.30	\$97.50
08/09/2021	DJO	Letter to client with Court calendaring and draft scheduling Order;;	0.20	\$65.00
08/13/2021	DJO	Seventh Supplemental Disclosure;	0.30	\$97.50
8/16/2021	DJO	September 1 memo to Atty. Coughlin; message to Pam Brown; letter from Atty. Coughlin with draft Scheduling Order; letter to client;	0.50	\$162.50

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08/30/2021	DJO	Conference with Mehdi re status and scheduling; discussed Rule 19 issue and that both ? feel it applies and the affect that it will have on this office if 200+ additional parties are required to take position of Plaintiff or Defendant's position;	0.75	\$243.75
08/31/2021	DJO	Meet and confer with Atty. Coughlin re scheduling order and Rule 19 -- ?? party issue; prepare file memo;	0.50	\$162.50
09/01/2021	DJO	Research Rule 19 case law (33 reported cases); complete notes;	2.75	\$893.75
09/07/2021	DJO	Letter from Atty. Coughlin; review of draft scheduling Order; prepare file memo;	0.25	\$81.25
09/23/2021	DJO	Research and case review; prepare file memo;	0.40	\$130.00
09/24/2021	DJO	Research re Rule 19; start draft on Motion for Rule 19 Treatment;	3.80	\$1,235.00
09/26/2021	DJO	Research and memorandum re Joinder;	3.25	\$1,056.25
09/27/2021	DJO	Work on Rule 19 motion; first and second draft;	2.40	\$780.00
09/28/2021	DJO	Third draft and additional research; prepare file memo; email from Atty. Coughlin; phone call with Atty. Coughlin;	2.50	\$812.50
09/29/2021	DJO	Amendments;	0.80	\$260.00
09/30/2021	DJO	Work on legal and review cites;	0.40	\$130.00
10/04/2021	DJO	Final form;	0.40	\$130.00
10/06/2021	DJO	Schedule Order from Court; memo to client;	0.10	\$32.50
10/19/2021	DJO	Phone call with R. Edwards re Plaintiff's statements and allegations to propective buyer of Edward's home;	0.30	\$97.50
10/20/2021	DJO	Phone call with Atty. Coughlin re 2:00 pm filing re Rule 19; prepare file memo; phone call with US SW;	0.10	\$32.50
10/20/2021	DJO	Review of Atty. Coughlin Rule 19 request; phone call with US Sheldon H. Weisberg, Esq. -- Wendy per Edwards' sale; phone call with Todd Levett re Mrs. Knight.	0.25	\$81.25
10/22/2021	DJO	Review of Plaintiff Rule 19 motion; memo to client with documents;	0.15	\$48.75
10/25/2021	DJO	Review of Motion and cases re Rule 19; attend Zoom Conference re status; prepare file memo re Plaintiff's obligation to join all 3 sub-division owners; prepare file memo;	0.50	\$162.50
10/29/2021	DJO	Letter to client; prepare file memo; Notice from Court; prepare file memo;	0.10	\$32.50
11/29/2021	DJO	Response to Defendant's motion re Rule 19;	0.25	\$81.25
11/30/2021	DJO	Review of Court Order re reply brief and rules;	0.15	\$48.75

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802X Fairway Constructors Inc.
 Matter Number: 18B1 adv. KNIGHT
 Matter Type: CONSTRUCTION LAW: Contracts Billing Mode: Hourly
 Dates Included on Report: 01-01-2018 Thru 01-01-2022

12/05/2021	DJO	Research on Plaintiff's response; prepare file memo;	1.15	\$373.75
12/13/2021	DJO	Work on Reply; begin draft; prepare file memo;	1.75	\$568.75
12/14/2021	DJO	Complete 1st and 2nd draft and research;	2.15	\$698.75
12/15/2021	DJO	Final form Reply;	1.30	\$422.50

SUMMARY - By Time Ticket Type

Billable:	\$155,853.75
Trial:	\$0.00
Flat Charge:	\$0.00
Non-Billable:	\$0.00
No Charge:	\$0.00
Misc No Charge:	\$0.00
Total:	\$155,853.75

SUMMARY - By Timekeeper

DJO	Billable Timekeeper Hours & Fees. .	479.55	\$155,853.75
DJO	No Charge Hours	0.10	\$0.00
DJO	Misc No Charge Hours.	1.00	\$0.00
	Misc. Fee Debits & Credits. . . .	-	\$0.00
	Total:	480.65	\$155,853.75

HARD COSTS

Matter History Report

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LAW OFFICES OF DANIEL J. OEHLER

File Number: 5802X Fairway Constructors Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: CONSTRUCTION LAW: Contracts Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 01-01-2022

3rd Party Legal Counsel Review	\$641.40
Corporation Commission Records	\$20.00
Filing Fees	\$702.30
Service Fees	\$10.61
Transcript(s)	\$89.00

Hard Costs SubTotal: \$1,463.31

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802X Fairway Constructors Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: CONSTRUCTION LAW: Contracts Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 01-01-2022

Knight v. Ludwig, et al.
Mohave County Superior Court
Docket No. CV-2018-04003

EXHIBIT B

Matter History Report

Report Date: 12/26/2023
Report Time: 8:37AM
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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

Date	T'kpr	Description	Hours	Amount
01/13/2022	DJO	General Review of Rule 4 and 2021 complaint and Request for Service waiver; exhibits;	0.40	\$130.00
01/19/2022	DJO	Phone call with Atty. Ellias; phone call with Paul Lenkowsky, Esq.; prepare file memo;	0.25	\$81.25
01/21/2022	DJO	Outline Courts and demands re Motion to Dismiss;	1.15	\$373.75
01/25/2022	DJO	Research re Motion to Dismiss -- Rule 12 ARCP and vexatious sanctions per ARS 12-3201; prepare file memo;	1.25	\$406.25
01/26/2022	DJO	Research 00 vexations case law; Plaintiff's exhibits re "Ludwig Engineering" allegations;	1.25	\$406.25
01/27/2022	DJO	Research on multiple complaints filed simultaneously;	0.60	\$195.00
02/02/2022	DJO	Research re Rule 4, Rule 12 and Rule 7; phone call with Atty. Elias re Rule 7 compliance; prepare file memo;	1.20	\$390.00
02/07/2022	DJO	Miscellaneous Minute Entries from Court; phone call with Atty. Elias; message to atty. Coughlin's office re Rule 7 requirements; phone call with Atty. Coughlin; phone call with Atty. Elias (2);	1.60	\$520.00
02/08/2022	DJO	Work on file re Motion to Dismiss; Note service documents on 3 separate Defendants -- Arzami, Fairway and Ludwig;	0.60	\$195.00
02/14/2022	DJO	Preparation of Notice of Appearance for Arzami, Ludwig Engineering and Fairway; Acceptance of Service; letter to Atty. Coughlin re Rule 7 ARCP;	0.40	\$130.00
02/15/2022	DJO	Revisions to letter to Atty. Coughlin memo from Plaintiff; prepare file memo;	0.25	\$81.25
02/16/2022	DJO	Review of Pro per and attorney communications and information requests from Plaintiff;	0.25	\$81.25
02/17/2022	DJO	Pleading re venue from Plaintiff; prepare file memo re Request to Defendant's that have appeared re copies of Pleadings;	0.30	\$97.50
02/21/2022	DJO	Memo follow-up request to Atty. Coughlin;	0.20	\$65.00
02/22/2022	DJO	Letter from Atty. Coughlin re Rule 7;	0.10	\$32.50
02/24/2022	DJO	Phone call with Atty. Elias re status; prepare file memo;	0.30	\$97.50
02/28/2022	DJO	Phone call with client re adding additional Defendants; pfm review of initial Atty. Elias draft motions; prepare file memo;	0.40	\$130.00
02/28/2022	DJO	Prepare file memo re Notice of Death re Mrs. Ludwig; phone call with Mehdi;;	0.15	\$48.75
04/04/2022	DJO	Request for status conference re Joinder Order; preparation of Order to Set;	0.25	\$81.25

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

04/06/2022	DJO	Letter from client; re abandonmen of CC&R; review of 4076B CC&Rs for accuracy---issue re Tract 4076D future exposure;	0.30	\$97.50
05/09/2022	DJO	Status conference with Judge Jansen; prepare file memo;	0.30	\$97.50
05/15/2022	DJO	Documents from Plaintiff with repeat proposal orders and forms re indispensable parties and Motion to Reconsider; prepare file memo;	0.50	\$162.50
06/08/2022	DJO	Review of Plaintiff's re efforts to amend CC&Rs and submittals to home/lot owners re class action lawsuit; memo to and memo from T'shura-Ann Elias, Esq. and Plaintiff;	0.40	\$130.00
06/09/2022	DJO	Request for status confeence with exhibits; prepare file memo; phone call with client;	0.75	\$243.75
06/10/2022	DJO	Final form request and order;	0.25	\$81.25
06/10/2022	DJO	Review of "Knight Unincorporated Association" recorded document; review of Title 33 -- planned communities; letter to Fidelity Title;	0.40	\$130.00
06/16/2022	DJO	Minute Entry from Judge Jantzen; memo and notice to client; prepare file memo;	0.15	\$48.75
07/29/2022	DJO	Note from Atty. Coughlin; review of statutes and Plaintiff's communications with potential Plaintiffs and Defendants; review initial proposed draft Order;	0.80	\$260.00
08/01/2022	DJO	Hearing preparation re status conference and Request to Dismiss; attend hearing;	1.50	\$487.50
08/02/2022	DJO	Draft deposition notice and Request to Produce; review; phone call with Atty. Elias; prepare file memo; reserach;	0.75	\$243.75
08/16/2022	DJO	Work on Notice to Property Owners; review of case law re "abandonment";	0.75	\$243.75
08/17/2022	DJO	Work on Notice to Property Owners;	0.40	\$130.00
08/19/2022	DJO	Final proposed Notice; objection to Plaintiff's notice;	1.20	\$390.00
08/29/2022	DJO	Response to Motion to Dismiss; review; prepare file memo;	0.40	\$130.00
08/30/2022	DJO	Research on Plaintiff's proposed Order; review of ARCP Rule 4 re Service of Process;	1.60	\$520.00
08/31/2022	DJO	Draft Objection to Plaintiff's second "Proposed Order" and draft Reply to Plaintiff Response Motion to Dismiss;	1.30	\$422.50
09/01/2022	DJO	Work on Objections to Form of Order and Response to Motion to Dismiss;	0.90	\$292.50
09/06/2022	DJO	Final form Objection to Form Order and Objection to Notice;	0.80	\$260.00
09/14/2022	DJO	Hearing preparation; prepare file memo;	0.80	\$260.00
09/15/2022	DJO	Motion Hearing -- Judge Jansen;	1.40	\$455.00

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

09/19/2022	DJO	Review of second documents proposed Order from Plaintiff; draft Amendments to Order; prepare file memo;	0.90	\$292.50
09/20/2022	DJO	Second draft;	0.25	\$81.25
09/27/2022	DJO	Notice from Plaintiff re Atty. Coughlin and attempted Revocation of Attorney Agreements posted August 29, 2022;	0.25	\$81.25
09/28/2022	DJO	Pleading from Plaintiff re Discharge of Councilw Notice of Filing proposed Form of Order and Notice with Court;	0.60	\$195.00
10/03/2022	DJO	Motion to Amend Complaint; Notice of Objection to General Order; review of Plaintiff's proposed Order filed 9/29, 09/29, 09/29;	0.90	\$292.50
10/03/2022	DJO	Review of Plaintiff Knight's Motion for Reconsideration 3 total; Review of Plaintiff Knight's Motion for Consolidation filed 10/3/22;	0.70	\$227.50
10/04/2022	DJO	Phone call with Atty. Elias re possible Joinder per Plaintiff's motions; email to Atty. Elias re 2018 pending action;	0.50	\$162.50
10/12/2022	DJO	Draft and final Motion for accelerated status conference with Judge Jansen;	0.30	\$97.50
10/13/2022	DJO	Phone call with Atty. Elias re status and overlap with 2018 and 2021 cases;	0.20	\$65.00
10/17/2022	DJO	Letter to client with list of current pleadings by Ms. Knight;	0.25	\$81.25
10/24/2022	DJO	Review and notate 4 pleadings in Mohave (+or-200 pages); prepare for hearing;	1.80	\$585.00
10/25/2022	DJO	Final preparation for Court hearing; attend hearing; prepare file memo;	2.50	\$812.50
10/26/2022	DJO	Review 10/22 filings and memoranda;	0.80	\$260.00
11/07/2022	DJO	Begin draft of Court ordered objection to form of Order and sort out which of 3 motions involved;	0.80	\$260.00
11/08/2022	DJO	Complete draft of Objections; prepare file memo;	2.25	\$731.25
11/09/2022	DJO	Second draft of Objection 3;	1.70	\$552.50
11/11/2022	DJO	Work on Responses to 3 Plaintiff's motions; draft 5 + final 5 phone calls with office re amendments;	6.50	\$2,112.50
11/15/2022	DJO	Case law research on "unclear hands" as equitable defense against Answer Plaintiff's counter claims re Plaintiff's November 2 claims;	0.80	\$260.00
11/17/2022	DJO	First draft--response to "unclean hands" issue;	0.80	\$260.00
11/18/2022	DJO	Final form Response -- "unclean hands";	0.60	\$195.00
11/19/2022	DJO	Fraud issue research and review of Plaintiff's pleadings; prepare file memo;	1.60	\$520.00
11/21/2022	DJO	Work on Response re Plaintiff's "fraud" issue; review of Plaintiff's reply re unclean hands; work on Injunction;	3.80	\$1,235.00

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

11/22/2022	DJO	Work on Motions; phone call with client;	2.25	\$731.25
11/23/2022	DJO	Second draft and final Response to motions to amend;	6.50	\$2,112.50
11/29/2022	DJO	Reply to fraud claims; prepare file memo; phone call with Doug McKee (3);	0.75	\$243.75
11/30/2022	DJO	Review of status for hearing issues; message from McGee; phone call with Doug;	0.50	\$162.50
12/01/2022	DJO	Request for Status Conference; prepare file memo;	0.15	\$48.75
12/05/2022	DJO	Response from Plaintiff re status conference; prepare file memo;	0.25	\$81.25
12/07/2022	DJO	Review of Motion in Objection to Status Conference; research re Rule 7 and local Rule 12F;	0.70	\$227.50
12/08/2022	DJO	Motion to Strike--draft; final form;	0.50	\$162.50
12/09/2022	DJO	Final form #2; filing;	0.25	\$81.25
12/13/2022	DJO	Letter from Plaintiff Knight re Attorney General and US Arttorney; memo to client with copy;	0.50	\$162.50
01/10/2023	DJO	Letter from Knight to Attys. Elias and Oehler and Court re Atty. Coughlin;	0.15	\$48.75
01/11/2023	DJO	Report from Plaintiff Knight to Arizona Attorney General and U.S. Attorney; memo to client with Complaint;	0.25	\$81.25
01/24/2023	DJO	Letter from Knight with Jansen J.A.; memo to client; notice from Court re status conference;	0.30	\$97.50
02/03/2023	DJO	Motion for Summary Judgment from Knight; prepare file memo; phone call with client; prepare file memo re Motion for Summary Judgment;	0.30	\$97.50
02/08/2023	DJO	Begin review of Plaintiff Motion for Summary Judgment and timing re status conference on February 17, 2023;	0.40	\$130.00
02/16/2023	DJO	Preparation for Status Conference; review of six pending motions, response and replies; prepare file memo;	4.75	\$1,543.75
02/17/2023	DJO	Attend Status Conference; prepare file memo;	0.80	\$260.00
02/20/2023	DJO	Memo to client; and Atty. Elias; prepare file memo; review of Clerk's Minute Entry; prepare file memo;	0.30	\$97.50
02/21/2023	DJO	Bias motion from Knight; prepare file memo; memo to client and Atty. Elias;	0.30	\$97.50
02/22/2023	DJO	Draft Motion to Strike; prepare file memo;	0.70	\$227.50
02/23/2023	DJO	Final Motion to Strike; review of Order from Court re Service on necessary parties; prepare file memo; memo to client; memo from Atty. Elias;	0.25	\$81.25

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

02/24/2023	DJO	Notice from Court re Bias Motion; prepare file memo; memo to Plaintiff;	0.15	\$48.75
02/24/2023	DJO	Phone call with Counsel re responsive Pleading in "Bias" Motion; review of documents re Plaintiff's violation of Court Order re contacting parties; not yet served; review of 12-409 re waiver and Rule 42 re Change of Judge; prepare file memo;	1.25	\$406.25
02/27/2023	DJO	Draft Objection to Change of Judge (3); final form to Comply with Rule 42 (2);	3.50	\$1,137.50
03/01/2023	DJO	Notice of Filing; prepare file memo; rules review;	0.40	\$130.00
03/02/2023	DJO	Review of Plaintiff's Motion to Strike Defendants' 14 pagg unsuccessful 2019 Motion for Summary Judgment; memo to client; prepare file memo;	0.50	\$162.50
03/02/2023	DJO	Review of Motion for Change of Judge in Mohve County case transferred to Yavapai Courts; memo to T'shura-Ann Elias, Esq. and Atty. Haws; memo to client;	0.40	\$130.00
03/05/2023	DJO	Draft Motion to Strike Plaintiff's Motion to Strike (3/1/23);	0.75	\$243.75
03/07/2023	DJO	Final Motion to Strike; attempt to reach Plaintiff re Certificate of Goodfaith;	0.50	\$162.50
03/08/2023	DJO	Phone call with Ms. Knight; prepare file memo; final Goodfaith Certificate; memo to Plaintiff re withdrawal of Request for Fees Sanction;	0.30	\$97.50
03/09/2023	DJO	Note from Plaintiff; amend and file "Good Faith Certificate"; review of Plaintiff's Reply to Defendant's Response re Motion to Strike; prepare file memo;	0.75	\$243.75
03/10/2023	DJO	Pleading to client; prepare file memo;	0.20	\$65.00
03/13/2023	DJO	Motion to Strike Plaintiff's Reply;	0.30	\$97.50
03/14/2023	DJO	Phone call with client re status;	0.00	No Charge
03/15/2023	DJO	Motion from Plaintiff re Motions to Strike Plaintiff's Reply;	0.20	\$65.00
03/23/2023	DJO	Pleading from Plaintiff re Motion for Change of Venue; Review of motion and Plaintiff's statement tat Change of Judge Motion was denied; review of Clerk's record for any Ruling on Bias Motion Acceptance of Service no ruling has been received by Defendants from Judge Lambert denying change of Judge; Review Rule 12-401, et seq.; memo to client; begin draft of Objection to Venue Change;	3.80	\$1,235.00
03/28/2023	DJO	Initial draft of Venue Motion; prepare file memo;	1.30	\$422.50
03/30/2023	DJO	Second draft;	0.70	\$227.50

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

03/30/2023	DJO	Review of Court Order re Denial of Bias Motion; review of Plaintiff's second Motion for Reconsideration (53 pages); prepare file memo;	0.80	\$260.00
03/31/2023	DJO	Final Venue response;	0.40	\$130.00
04/03/2023	DJO	Draft Affidavit of Fees and Costs for motions 9/28/22 thru 2/17/23; preparation of draft form of Order;	1.20	\$390.00
04/04/2023	DJO	Final Affidavit of Fees and Costs; final proposed Order;	0.25	\$81.25
04/27/2023	DJO	Letter from Plaintiff to Judicial Assistant; review Defendant's filings with Court of Appeals re Plaintiff's statements to Judicial Assistant;	0.30	\$97.50
04/27/2023	DJO	Final Venue Objection Motion;	0.90	\$292.50
05/10/2023	DJO	Review of Plaintiff's objection, response/Motion for Fees; research; begin reply/response; prepare file memo re issue preclusion;	2.40	\$780.00
05/12/2023	DJO	First draft re fee objection and response;	1.15	\$373.75
05/12/2023	DJO	Final form response/reply re fees; prepare file memo;	0.90	\$292.50
05/17/2023	DJO	Review of Plaintiff's reply re attorney fee award; prepare file memo;	0.40	\$130.00
06/05/2023	DJO	File review and organization for upcoming new Judge; status conference;	1.30	\$422.50
06/07/2023	DJO	Review of outstanding motions; responses and replies; research on "Law of the Case: issues; prepare file memo;	3.70	\$1,202.50
06/08/2023	DJO	Status conference with Judge Neilson; prepare file memo;	0.75	\$243.75
06/09/2023	DJO	Second motions from Plaintiff; prepare file memo;	0.25	\$81.25
06/13/2023	DJO	Review of Plaintiff's 3 new motions; prepare file memo;	0.70	\$227.50
06/20/2023	DJO	Begin research re Plaintiff's 3 new motions;	2.40	\$780.00
06/21/2023	DJO	Work on initial draft for responses to Plaintiff's extension of time and Rul3 12 motions;	3.25	\$1,056.25
06/23/2023	DJO	Complete drafts and final form with exhibits;	5.70	\$1,852.50
06/27/2023	DJO	Review of and notate Plaintiff's reply to Rule 12 and extension issues and Plaintiff's exhibits;	0.80	\$260.00
06/30/2023	DJO	Order from Judge Nielson re Plaintiff's Summary Judgment motion and Plaintiff's "service" documents proposed in Plaintiff's Motion to Reconsider; review of Plaintiff's Summary Judgment motion, Motion to Strike and Judge Jansen's Order to Be Served of Necessary Parties; prepare file memo;	1.25	\$406.25
07/01/2023	DJO	Settlement Offer from Plaintiff; memo to client; prepare file memo;	0.20	\$65.00

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LAW OFFICES OF DANIEL J. OEHLER

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Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

07/03/2023	DJO	Review of filing re Motion for Summary Judgment, Response and Reply; prepare file memo re Motion to Strike;	0.30	\$97.50
07/05/2023	DJO	Draft Response per Court Order; prepare file memo; review of filing re May 15, 2023 motion for reconsideration on Rule 19 summons packet/history including pleading between August 2022 and present; research all ARCP rules and amendments re Service of Summons, Waivers and Acceptance of Service; review Coughlin submittals on issue; start draft;	6.10	\$1,982.50
07/06/2023	DJO	Final form Summary Judgment issue; 1st and 2nd draft on reconsideration of existing Court order and companion documents; final form Response and final exhibits;	4.80	\$1,560.00
07/07/2023	DJO	Phone call with Atty. Elias re reconsideration motion and summary judgment;	0.30	\$97.50
07/10/2023	DJO	Review reply to pleadings from Plaintiff; prepare file memo; record search for Plaintiff's Notice Order -- July 2022; memo to Plaintiff;	0.80	\$260.00
07/11/2023	DJO	Continue review and cross reference Plaintiff's pleadings in reply to Defendant's clarification and reconsideration reply;	1.75	\$568.75
07/17/2023	DJO	Case law search -- fraud-restatement Section 552 and Arizona cases;	1.20	\$390.00
07/21/2023	DJO	Memo from Court re July 28 conference;	0.10	\$32.50
07/23/2023	DJO	Begin preparation for July 27 motion day with Judge Nielsen;	1.30	\$422.50
07/25/2023	DJO	Continue preparation for Thursday hearings on outstanding motions and file organization;	1.40	\$455.00
07/26/2023	DJO	Complete hearing preparation;	3.75	\$1,218.75
07/27/2023	DJO	Attend hearing on plus/minus 7 outstanding motions (8:45 to 10:15); prepare file memo;	1.30	\$422.50
07/28/2023	DJO	Filing and correspondence search re "Notice to Indispensible Parties"; prepare file memo;	0.30	\$97.50
08/01/2023	DJO	Draft Acceptance of Service effect requiring timellines of and manner of filing an answer or response;	1.25	\$406.25
08/02/2023	DJO	Letter from Plaintiff with Requests re Service Order amendments and "Notice to Owners" issues; prepare file memo; pull file documents;	0.30	\$97.50
08/04/2023	DJO	Draft letter to Plaintiff re indispensible parties;	0.75	\$243.75
08/07/2023	DJO	Work on Order re Service and modifications; review of Plaintiff's proposed documents;	2.75	\$893.75
08/07/2023	DJO	Letter from Plaintiff re Service of Process and Procedure; notice from Court re motion reuling;	0.25	\$81.25
08/08/2023	DJO	Draft amended Order to Plaintiff re Waiver of Service and Notice to Owners;	1.75	\$568.75

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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

08/14/2023	DJO	Second draft and final form "Order to Plaintiff: and Court notice to new parties; final form;	3.25	\$1,056.25
08/16/2023	DJO	Work on Notices to Parties--support of Plaintiff position statements; prepare file memo;	1.75	\$568.75
08/17/2023	DJO	Memo from Plaintiff re Order and Notice issues; complete support of statements issue;	0.30	\$97.50
08/18/2023	DJO	Final form all documents re Service and Order to Plaintiff;	0.25	\$81.25
08/24/2023	DJO	Preparation of Filing Notice re amendment to Jansen Order; draft and final form all exhibits;	0.60	\$195.00
08/24/2023	DJO	Pleading from Knight dated August 12 found in Court filing on line 8-29; compare to August 20 replacement amended notice; prepare file memo;	0.75	\$243.75
08/25/2023	DJO	Cross reference third documents Plaintiff Notice to Rule 19 parties; prepare file memo; research re Fule 54, 12-349 sanction issues re Affidavit of Fees;	2.80	\$910.00
08/28/2023	DJO	Review of cases re "Enforce One/Enforce all Issues"; review of Rule 12--Motion to Strike Plaintiff's draft Order to Plaintiff and 3 draft noties to owners re false statments, falsifying case captions;	2.30	\$747.50
08/29/2023	DJO	Work on Rule 12 (f) and Rule 7.1 ARCP - Motion to Strike Plaintiff's proposed Order to Plaintiff and 3rd Notices to Rule 19 parties;	3.10	\$1,007.50
08/30/2023	DJO	Draft and final letter to Plaintiff requesting Plaintiff's withdrawal of proposed Order to Plaintiff and separate Notcies to Rule 19 parties;	2.75	\$893.75
09/02/2023	DJO	Research restatement, ALR and Arizona cases on Uniformity --if enforced against one, must enforce against all;	0.80	\$260.00
09/04/2023	DJO	Draft Motion to Strike Plaintiff's Order re service and 3 Court notices to Rule 19 parties;	1.75	\$568.75
09/04/2023	DJO	Phone call with Plaintiff re withdrawal of August 15 proposed Order and all three notices; prepare file memo;	0.50	\$162.50
09/05/2023	DJO	Draft Good Faith Certificate; Final form certificate; final form Motion to Strike;	1.40	\$455.00
09/08/2023	DJO	Draft and final Notice of Lodging proposed Judgment and preparation of Form of Judgment for Jansen ordered fees;	0.60	\$195.00
09/10/2023	DJO	Review of Plaintiff's Notice to Parties and Second Proposed Order; review of Plaintiff's REsponse to Strike Motion and Exhibits;	0.60	\$195.00
09/12/2023	DJO	Draft Motion to Strike Plaintiff pleadings filed/dated September 9, 2023 cross check September 9th Plaintiff's "Notice" with prior Notice;	2.75	\$893.75
09/13/2023	DJO	Final second Motion to Strike;	0.30	\$97.50

Matter History Report

Report Date: 12/26/2023
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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

09/15/2023	DJO	Prepare Affidavit of Fees; Application for Fees and Costs; prepare Statement of Costs; draft Judgment and Notice of Lodging;	0.75	\$243.75
09/18/2023	DJO	Final Judgment;	0.15	\$48.75
09/22/2023	DJO	Draft and final Motion to Strike Plaintiff's response; draft and final Notice re Plaintiff's Corrective Motion/Reconsideration;	0.75	\$243.75
10/03/2023	DJO	Review and notate Plaintiff's September 27th Motion to Amend;	0.75	\$243.75
10/04/2023	DJO	Review Plaintiff's Motion for Correction of Legal Errors, dated 10/2/23; preparation of Notice/Response re Reconsideration;	0.80	\$260.00
10/09/2023	DJO	Research re Motion to Amend; review 5 prior;	2.20	\$715.00
10/10/2023	DJO	Initial draft; prepare file memo; research;	3.50	\$1,137.50
10/11/2023	DJO	Review of Plaintiff's new pleading; final form Opposition to Amend;	4.40	\$1,430.00
10/16/2023	DJO	Review of Plaintiff's October 14th Motion Demanding Court to Reverse; Review of Plaintiff's Reply to Defendant's Response to Plaintiff's 5th or 7th Motion to Amend;	1.10	\$357.50
10/18/2023	DJO	Review of all Plaintiff filing before Judge N?; research on "Law of the Case"; draft Response;	2.25	\$731.25
10/19/2023	DJO	Final form Response to Plaintiff's Motion for Defendant's to join Rule 19 parties;	0.40	\$130.00
11/01/2023	DJO	Plaintiff's Motion for Relief from Court award; prepare file memo;	0.25	\$81.25
11/03/2023	DJO	Rj Plaintiff's Application for Fees and Penalty; Affidavit of Damages; Notice of Lodging Judgements; work on memorandum;	0.10	\$32.50
11/06/2023	DJO	Review of Plaintiff's reply re Rule 19 parties; draft Motion to Strike reply, pleading and exhibit; final form;	3.75	\$1,218.75
11/07/2023	DJO	Review of Plaintiff's 12 pages of Reply to Attorney Fee Filings;	0.40	\$130.00
11/20/2023	DJO	Review of three Motions for Declaratory Judgment; prepare file memo; Orders from Court; letter to Plaintiff;	0.60	\$195.00
11/21/2023	DJO	Review of fourth Motion for Declaratory Judgment; prepare file memo;	0.20	\$65.00

SUMMARY - By Timekeeper

DJO	Billable Timekeeper Hours & Fees. .	199.55	\$64,853.75
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Matter History Report

Report Date: 12/26/2023
Report Time: 8:37AM
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LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi/ Fairway Constructors, Inc.
Matter Number: 18B1 adv. KNIGHT
Matter Type: REAL ESTATE: Miscellaneous Billing Mode: Hourly
Dates Included on Report: 01-01-2018 Thru 12-26-2023

Date of Last Payment: 11/30/2023

Date of Last Bill: 11/30/2023

Knight v. Ludwig, et al.
Mohave County Superior Court
Docket No. CV-2018-04003

EXHIBIT C

Matter History Report

LAW OFFICES OF DANIEL J. OEHLER

Client Number: 5802 Mehdi Azarmi / Fairway Constructors, Inc.
Matter Number: 18B1 adv. Knight
Matter Type: CIVIL
Billing Mode: Hourly
Dates Included on Report: 12/01/2023 - 12/31/2023

<u>Date</u>	<u>Description</u>	<u>Time</u>	<u>Total</u>
12/28/2023	Compile and review fees from 2018 through present; draft Application for Fees and Costs per Court findings of 12/21/2023; draft Affidavit of Fees; draft Statement of Costs	2.25	731.25
12/29/2023	Draft form of Judgment and Notice of Lodging and final form; Final form fee application, affidavit and statement	0.80	260.00

<u>COSTS</u>		
<u>Filing Fees</u>		30.69

<u>SUMMARY</u>		
Billable Hours and Fees (3.05/hrs x \$325.00/hr)		991.25
Costs		<u>30.69</u>
TOTAL FEES AND COSTS		<u>\$1,021.94</u>