

TAB 52

ESTATE OF	§	IN PROBATE COURT
	§	
NELVA E. BRUNSTING,	§	NUMBER FOUR (4) OF
	§	
DECEASED	§	HARRIS COUNTY, TEXAS

CARL HENRY BRUNSTING, et al	§
	§
v.	§
	§
ANITA KAY BRUNSTING, et al	§

Defendant/Co-Trustees’ Anita K Brunsting & Amy R. Brunsting’s Supplemental Discovery Responses & Production of Attorneys’ Fees Billing Records

Defendant/Co-Trustees Anita K. Brunsting and Amy R. Brunsting supplement their prior discovery responses as provided herein.

Respectfully submitted,

// s // Stephen A. Mendel

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 Emily J. Wyatt (24088685)
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Attorneys for Defendant/Co-Trustee Anita K. Brunsting

Respectfully submitted,

// s // Neal E. Spielman

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Attorneys for Defendant/Co-Trustee Amy R. Brunsting

Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument has been sent to all counsel of record/pro se parties via E-file and/or direct e-mail.

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Attorney for Carl Brunsting

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via eService, email, telefax, or first class mail, on this March 4, 2022.

// s // Stephen A. Mendel

Stephen A. Mendel

1. The correct names of the parties to the lawsuit.

RESPONSE: In addition to Defendant/Co-Trustees prior responses, the correct spelling of the names of the parties, which includes every sibling, are as set forth in the pleadings and other instruments set forth in this case.

2. The names, addresses, and telephone numbers of any potential parties.

RESPONSE: See Defendant/Co-Trustees prior responses to this request.

3. The legal theories and, in general, the factual basis of the responding party's claims or defenses (the responding party need not marshal all evidence that may be offered at trial).

RESPONSE: In addition to the Defendant/Co-Trustees prior responses to this request, Defendant/Co-Trustees incorporate by reference as though set forth in full herein, all of their prior pleadings, motions, responses, replies, discovery answers, discovery responses, discovery production, and other instruments, both at the federal court level and state court level (both district court and probate court).

4. The amount and any method of calculating economic damages.

RESPONSE: In addition to the Defendant/Co-Trustees prior responses to this request, Defendant/Co-Trustees incorporate by reference as though set forth in full herein, all of their prior pleadings, motions, responses, replies, discovery answers, discovery responses, discovery production, and other instruments, both at the federal court level and state court level (both district court and probate court). More specifically, but not exclusively, Candace Louise Curtis has suffered no damages by virtue of her violation of the no-contest provisions of the trust instruments.

5. The name, address, and telephone number of persons having knowledge of relevant facts, and a brief statement of each identified person's connection with the case.

RESPONSE: In addition to the Defendant/Co-Trustees prior responses to this request, Defendant/Co-Trustees incorporate by reference as though set forth in full herein, all of their prior pleadings, motions, responses, replies, discovery answers, discovery responses, discovery production, and other instruments (such as the pretrial orders), both at the federal court level and state court level (both district court and probate court). More specifically, but not exclusively, Candace Louise Curtis has suffered no damages by virtue of her violation of the no-contest provisions of the trust instruments.

6. For any testifying experts:

- A. The expert's name, address, and telephone number;
- B. The subject matter on which the expert will testify;
- C. The general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to your control, documents reflecting such information;
- D. If the expert is retained by, employed by, or otherwise subject to your control:
 - 1) All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
 - 2) The expert's current resume and bibliography.

RESPONSE: In addition to all other persons designated by the Co-Trustees as experts in this case, the Co-Trustees supplement as follows:

Stephen A. Mendel (13930650)
The Mendel Law Firm, L.P.
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Houston, TX 77079
O: 281-759-3213
F: 281-759-3214

Mr. Mendel will testify about the amount, reasonableness, and necessity of any attorneys' fees, expenses, and/or costs sought by any party in this case, including fees, expenses, and costs paid or incurred by the Defendant/Co-Trustees. Mr. Mendel's opinions are based on his skill, knowledge, education, experience, and training, and the work conducted in this case and cases related to this case, such as the 2012 and 2016 federal court cases, and the appeals related thereto, the plaintiff's bill of review, the plaintiff's efforts to domesticate an instrument that is not a final judgment, claims asserted against Vacek & Freed, and administration of the decedent and survivor trusts. Mr. Mendel's opinions are based on factors that include, but may not be limited to: (1) the time and labor required; (2) the nature of the issues raised in the case; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by the attorneys due to acceptance of this case; (5) the customary fee in such cases; (6) the nature of the fee arrangement; (7) time limitations imposed by the client or the circumstances; (8) the amount of the potential judgment and the results that may be obtained; (9) his experience, reputation, and ability of himself and those who assisted him with this case; (10) whether the case imposed any hardship on his law firm and/or his litigation docket; and (11) the

nature of his professional relationship with Defendant/Co-Trustee Anita K. Brunsting. As of February 28, 2022, Mr. Mendel opines that the attorneys' fees, expenses, and costs will be not less than \$500,000.00 and, in reasonable probability will be higher because of additional work to perform between March 1, 2022, through the date of a final judgment and any appeals that may arise. See billing records attached hereto as Exhibit A.

Samuel Griffin (8473800)
Neal E. Spielman (0794678)
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Messrs. Griffin and Spielman will testify about the amount, reasonableness, and necessity of any attorneys' fees, expenses, and/or costs sought by any party in this case. Their opinions are based on their skill, knowledge, education, experience, and training, and the work conducted in this case and cases related to this case, such as the 2012 federal court case, and the appeals related thereto, the plaintiff's bill of review, and the plaintiff's efforts to domesticate an instrument that is not a final judgment, and claims asserted against Vacek & Freed, and administration of the decedent and survivor trusts. Messrs. Griffin's and Spielman's opinions are based on factors that include, but may not be limited to: (1) the time and labor required; (2) the nature of the issues raised in the case; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by the attorneys due to acceptance of this case; (5) the customary fee in such cases; (6) the nature of the fee arrangement; (7) time limitations imposed by the client or the circumstances; (8) the amount of the potential judgment and the results that may be obtained; (9) their experience, reputation, and ability of themselves and those who assisted them with this case; (10) whether the case imposed any hardship on the law firm of Griffin & Matthews and/or their litigation docket; and (11) the nature of his professional relationship with Defendant/Co-Trustee Amy R. Brunsting. As of February 28, 2022, Messrs. Griffin and Spielman opine that the attorneys' fees, expenses, and costs will be not less than \$205,000.00 and, in reasonable probability will be higher because of additional work to perform between March 1, 2022, through the date of a final judgment and any appeals that may arise. See billing records attached hereto as Exhibit B.

7. Any indemnity and insuring agreements described in Texas Rule of Civil Procedure 192.3 (f).

RESPONSE: None.

8. Any settlement agreements described in Texas Rule of Civil Procedure 192.3(g).

RESPONSE: The parties mediated the case three (3) times without success.

A. 2012 –William T. Miller, a probate and trust litigator with Hunton Andrews Kurth.

B. November 2019 – Hon. Charles Seymore.

C. June 2020 – Hon. Mark Davidson.

Defendant/Co-Trustees did not enter into any settlement agreements with person or entity at any of the foregoing mediations.

9. Discoverable witness statements.

RESPONSE: In addition to all other statements, if any, identified by the Co-Trustees, none; provided, however, to the extent that the depositions of Candace Kunz-Freed, Carl Brunsting, and Carole Brunsting, and all affidavits and/or unsworn declaration on file in this matter, of any person, including any party, constitute a witness statement, then such statements are incorporated by reference herein as though set forth in full.

10. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills that are reasonably related to the injuries or damages asserted or; in lieu thereof, an authorization permitting the disclosure of such medical records and bills.

RESPONSE: Not applicable.

11. In a suit alleging physical or mental injury and damages from the occurrence that is the subject of the case, all medical records and bills obtained by the responding party by virtue of an authorization furnished by the requesting party.

RESPONSE: Not applicable.

12. Produce the name, address, and telephone number of any person who may be designated as a responsible third party.

RESPONSE: None.

* * * * *

Exhibit A

The Mendel Law Firm, L.P.

Attorneys & Counselors
1155 Dairy Ashford, Suite 104
Houston, TX 77079

Anita K. Brunsting
801 Bassington Court
Pflugerville, TX 78660

In Reference To: C.A. No. 412249 & 412249-401; *Candace Curtis v. Anita Brunsting, Et Al*; In Probate Court No. 4, Harris County, Texas.

C.A. No. 412249 & 412249-402; *Candace Curtis v. Anita Brunsting, Et Al - Plea in Abatement*; In Probate Court No. 4, Harris County, Texas.

C.A. No. 412249 & 412249-403; *Carl Henry Brunsting, Executor of the Estates of Elmer H. Brunsting & Nelva E. Brunsting; v. Candace L. Kunz-Greed & Vacek & Freed, PLLC*; In Probate Court No. 4, Harris County, Texas (transfer of C.A. 2013-05455 from the 164th District Court, Harris County, Texas).

C.A. No. 412249 & 412249-404; *Candace Curtis v. Anita Brunsting, Et Al - Bill of Review*; In Probate Court No. 4, Harris County, Texas.

Professional Services

		<u>Hrs/Rate</u>		<u>Amount</u>
9/10/2014	SAM	Conferred with prepared correspondence to	0.50 395.00/hr	Canda L120 NO CHARGE
9/17/2014	SAM	Reviewed the court's file re case status; reviewed authorities re	0.60 395.00/hr	Litiga L120 \$237.00
9/26/2014	SAM	Prepared for and met with conferred with	3.00 395.00/hr	Canda L120 \$1,185.00
	BEF	Reviewed probate court records, federal court records, district court Vacek & Freed records, and District Court Rule 202 records re status and	2.40 295.00/hr	Canda L110 \$708.00

			<u>Hrs/Rate</u>	<u>Amount</u>	
allegations in the various cases and potential issues regarding trust and related issues; prepared multiple correspondence to					
9/26/2014	BEF	Met with	3.00 295.00/hr	Canda L110	NO CHARGE
10/13/2014	SAM	Prepared for and attended telephone conference with conferred with conferred with	1.50 395.00/hr	Canda L120	\$592.50
	BEF	Conferred with	0.20 295.00/hr	Canda L120	NO CHARGE
10/17/2014	BEF	Reviewed documents produced by former counsel re deadlines.	0.20 295.00/hr	Canda L120	\$59.00
10/21/2014	SAM	Prepared the engagement letter; prepared correspondence to	0.30 395.00/hr	Canda L120	NO CHARGE
10/26/2014	SAM	Finalized the engagement letter for prepared correspondence to	0.20 395.00/hr	Canda Admi	NO CHARGE
10/30/2014	SAM	Reviewed correspondence from reviewed file re	0.30 395.00/hr	Canda L120	\$118.50
	BEF	Reviewed J. Ostrom's request for distribution.	0.30 295.00/hr	Canda L120	\$88.50
11/5/2014	SAM	Reviewed the court's file; prepared correspondence to	0.60 395.00/hr	Canda L120	\$237.00
	LGR	Reviewed and updated the litigation files; conferred with K. Clairmont re same.	0.30 129.50/hr	Litiga L140	NO CHARGE
11/6/2014	KRC	Reviewed notice of hearing; updated pleadings index.	0.20 129.50/hr	Litiga L140	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
11/7/2014	BRD	Reviewed the court's records and obtained a copy of the case files.	0.80 129.50/hr	Canda L190	\$103.60
11/10/2014	SAM	Reviewed correspondence from conferred with	0.20 395.00/hr	Canda L120	\$79.00
	BRD	Reviewed and organized client documents; conferred with	0.50 129.50/hr	Canda L140	\$64.75
	BRD	Reviewed and organized client documents.	0.80 129.50/hr	Canda L140	\$103.60
	BEF	Reviewed motion to modify preliminary injunction.	0.10 295.00/hr	Canda L120	\$29.50
11/11/2014	BRD	Reviewed and organized client documents.	0.80 129.50/hr	Canda L140	\$103.60
11/12/2014	BRD	Prepared notice of appearance.	1.30 129.50/hr	Canda L190	NO CHARGE
11/13/2014	SAM	Conferred with	0.30 395.00/hr	Canda L120	NO CHARGE
	SAM	Prepared file memo re status of the case.	0.20 395.00/hr	Canda L120	\$79.00
	BRD	Prepared notice of appearance.	0.80 129.50/hr	Canda L190	\$103.60
	BEF	Reviewed Mills Shirley case files re case history.	1.00 295.00/hr	Canda L110	\$295.00
11/14/2014	SAM	Conferred with finalized the notice of appearance; prepared correspondence to	1.10 395.00/hr	Canda L120	\$434.50
	BRD	Conferred with prepared notice of appearance.	0.50 129.50/hr	Canda L190	\$64.75

			<u>Hrs/Rate</u>		<u>Amount</u>
11/19/2014	BEF	Reviewed supplemental bank statements and spreadsheets prepared by prepared statements for production; reviewed file re prior production.	0.90 295.00/hr	Canda L320	\$265.50
	BEF	Prepared correspondence to	0.10 295.00/hr	Canda L320	NO CHARGE
	BEF	Reviewed the trusts re trustee obligations and rights; met with	0.90 295.00/hr	Trust L120	\$265.50
11/20/2014	KRC	Reviewed and organized client documents; updated pleadings index.	0.30 129.50/hr	Litiga L190	NO CHARGE
	BEF	Prepared statements for production; prepared correspondence to counsel re same; reviewed correspondence from B. Bayless re Edward Jones statements; reviewed file re same.	1.30 295.00/hr	Carl L320	\$383.50
	BEF	Prepared correspondence to ; prepared correspondence to	0.30 295.00/hr	Trust L320	NO CHARGE
11/21/2014	TTT	Conferred with reviewed file re same; reviewed authorities re removal of the trustee and various causes of action against the trustee.	1.00 295.00/hr	Canda L120	\$295.00
	KRC	Conferred with reviewed and organized client documents.	0.30 129.50/hr	Litiga L190	NO CHARGE
	BEF	Prepared stock statements for production and reviewed same; reviewed various spreadsheets and pleadings re reviewed gifting analysis.	3.00 295.00/hr	Trust L320	\$885.00
12/2/2014	SAM	Conferred twice with	0.80 395.00/hr	Canda L120	\$316.00

		<u>Hrs/Rate</u>		<u>Amount</u>
12/2/2014	BEF	0.30 295.00/hr	Trust L120	NO CHARGE
	BEF	2.10 295.00/hr	Canda L250	\$619.50
12/3/2014	SAM	0.60 395.00/hr	Canda L120	\$237.00
	TTT	0.30 295.00/hr	Trust L120	NO CHARGE
	BEF	5.80 295.00/hr	Canda L240	\$1,711.00
12/5/2014	SAM	0.80 395.00/hr	Canda L240	\$316.00
	BEF	3.10 295.00/hr	Carl L250	\$914.50

reviewed trust instruments re same; prepared response to Carl Brunsting's motion for distribution of trust fund to pay creditor-attorneys; prepared response to Carl Brunsting's motion to remove Anita & Amy as co-trustees; prepared exhibits re same; conferred with

		<u>Hrs/Rate</u>		<u>Amount</u>
	met with			
12/5/2014	BEF Reviewed authorities re	3.00 295.00/hr	Canda L250	\$885.00
	prepared response to C. Curtis' motion for distribution of trust fund to pay creditor-attorneys; prepared exhibits re same; conferred with met with			
	BEF Prepared correspondence to	0.10 295.00/hr	Litiga L250	NO CHARGE
12/8/2014	BEF Prepared correspondence to	0.20 295.00/hr	Litiga L120	NO CHARGE
	BEF Reviewed C. Curtis' reply and response to motion for distribution of funds; reviewed authorities cited therein re prepared correspondence to	1.10 295.00/hr	Canda L120	\$324.50
12/9/2014	SAM Conferred with	0.20 395.00/hr	Litiga L250	NO CHARGE
	BEF Prepared for, traveled to, attended, and returned from hearing on motions to disburse trust funds to C. Curtis' attorneys; motions denied by court; prepared orders denying C. Curtis' motions; authorities showing error in C. Curtis' logic with respect to implicit argument that legislature included attorneys fees as necessities; met with J. Ostrom and B. Bayless post-hearing re potential settlement and case history; met with C. Reed prior to the hearing re status of the Vacek litigation; met with	3.50 295.00/hr	Canda L230	\$1,032.50

		<u>Hrs/Rate</u>		<u>Amount</u>
12/9/2014	BEF	3.60 295.00/hr	Carl L230	\$1,062.00
	BEF	0.40 295.00/hr	Carl L120	\$118.00
12/10/2014	BEF	0.80 295.00/hr	Carl L120	\$236.00
	BEF	0.70 295.00/hr	Carl L320	\$206.50
	BEF	1.40 295.00/hr	Canda L320	\$413.00
12/11/2014	SAM	1.30 395.00/hr	Canda L120	\$513.50
	BEF	4.00 295.00/hr	Canda L120	\$1,180.00

Prepared for, traveled to, attended, and returned from hearing on motions to disburse trust funds to Carl Brunsting's attorneys; motions denied by court; prepared orders denying Carl Brunsting's motions; authorities showing error logic with respect to implicit argument that legislature included attorneys fees as necessities; met with J. Ostrom post-hearing re potential settlement and case history; met with C. Reed prior to the hearing re status of the Vacek litigation; met with

Conferred with

Conferred with

Prepared supplemental document production; conferred with B. Bayless re bond liquidation; prepared correspondence to all counsel re same; reviewed objection from B. Bayless and prepared response citing specific language in the court order.

Reviewed Mills Shirley file re apparently missing documents and files from the federal case; prepared correspondence to reviewed trust instrument re claims and defenses in the case and varying standards for Anita's decisions;

Reviewed the decedent's trust, survivor's trust, the QBD trust; conferred with

conferred with ; conferred with

Conferred with prepared outline of the case and extensively review of trust documents and

			<u>Hrs/Rate</u>		<u>Amount</u>
		potential ambiguities and arguments related to same; conferred with reviewed authorities re			
12/12/2014	TTT	Conferred with	0.30 295.00/hr	Canda L120	\$88.50
	BEF	Conferred with	0.40 295.00/hr	Canda L120	NO CHARGE
	BEF	Reviewed file re	2.50 295.00/hr	Canda L310	\$737.50
		conferred with J. Ostrom re C. Curtis' failure to provide mandatory disclosures in federal case; prepared request for disclosure; conferred with			
		prepared plea to the jurisdiction and related issues re federal injunction.			
	BEF	Reviewed file re	2.40 295.00/hr	Carl L310	\$708.00
		prepared request for disclosure; conferred with			
		prepared plea to the jurisdiction and related issues re federal injunction.			
12/16/2014	BEF	Prepared correspondence to	0.10 295.00/hr	Canda L310	NO CHARGE
1/9/2015	BEF	Reviewed correspondence re proposed deposition dates; reviewed file re injunction and problems with the federal court remand or case that was never removed, J. Ostrom nonsuit of injunctive relief, and trust barriers to such injunction.	3.10 295.00/hr	Canda L250	\$914.50

		<u>Hrs/Rate</u>		<u>Amount</u>
1/12/2015	BEF	0.30	Canda	
		295.00/hr	L330	NO CHARGE
	BEF	0.50	Carl	
		295.00/hr	L330	\$147.50
	BEF	0.40	Canda	
		295.00/hr	L330	\$118.00
1/13/2015	SAM	0.40	Canda	
		395.00/hr	L120	\$158.00
	BEF	0.30	Trust	
		295.00/hr	L110	NO CHARGE
	BEF	3.20	Canda	
		295.00/hr	L310	\$944.00
				Reviewed document production and discovery responses exchanged in the case; conferred with prepared correspondence to all counsel re need for new docket control order in light of plaintiff's failure to provide substantive responses to request for disclosure regarding damages, attorneys' fees, and matters in dispute; prepared supplemental responses to request for production and prepared correspondence to
	BEF	2.10	Canda	
		295.00/hr	L120	\$619.50
1/14/2015	BEF	0.30	Litiga	
		295.00/hr	L120	NO CHARGE
	BEF	0.30	Canda	
		295.00/hr	L120	\$88.50
1/21/2015	BEF	0.10	Canda	
		295.00/hr	L110	\$29.50

			<u>Hrs/Rate</u>		<u>Amount</u>
1/22/2015	KRC	Reviewed request for disclosure; updated pleadings index.	0.20 129.50/hr	Canda L140	\$25.90
1/27/2015	BEF	Reviewed C. Curtis' new pleadings.	0.30 295.00/hr	Canda L210	\$88.50
	BEF	Prepared correspondence to	0.10 295.00/hr	Canda L210	NO CHARGE
1/28/2015	BEF	Reviewed client documents re response to issues raised in C. Curtis' petition; conferred with	0.90 295.00/hr	Canda L120	\$265.50
1/29/2015	BEF	Conferred with	0.40 295.00/hr	Canda L120	NO CHARGE
1/30/2015	BL	Conferred with	0.10 129.50/hr	Canda L190	\$12.95
	BEF	Reviewed documents received from reviewed transcript of federal case TRO hearing; prepared correspondence to	1.30 295.00/hr	Canda L310	\$383.50
	BEF	Prepared correspondence to	0.10 295.00/hr	Canda L120	NO CHARGE
2/4/2015	BEF	Conferred with prepared correspondence to reviewed the Wills re executors.	0.70 295.00/hr	Carl L330	\$206.50
2/5/2015	SAM	Conferred with	0.30 395.00/hr	Litiga L120	NO CHARGE
	BEF	Prepared no-evidence motion for summary judgment re Carl Brunsting's allegations and causes of action against A. Brunsting.	0.30 295.00/hr	Carl L240	\$88.50

			<u>Hrs/Rate</u>		<u>Amount</u>
2/5/2015	BEF	Prepared no-evidence motion for summary judgment re C. Curtis' allegations and causes of action against A. Brunsting.	0.30 295.00/hr	Canda L240	\$88.50
	BEF	Reviewed the C. Curtis' pleadings and filings re transfer of federal case and new request for distribution; conferred with	0.70 295.00/hr	Canda L210	\$206.50
	BEF	Prepared correspondence to	0.20 295.00/hr	Canda L210	NO CHARGE
2/6/2015	BEF	Reviewed personal representative issues and claims by personal representatives; conferred with	0.80 295.00/hr	Carl L120	\$236.00
2/17/2015	SAM	Conferred twice with	0.60 395.00/hr	Carl L120	\$237.00
	BEF	Reviewed deposition of Carl Brunsting; prepared correspondence to C. Reed re same and re meeting with him re facts of the case.	1.00 295.00/hr	Carl L330	\$295.00
	BEF	Prepared correspondence to conferred with	0.10 295.00/hr	Carl L120	NO CHARGE
	BEF	Prepared response to C. Curtis' request for distribution, and motion to quash injunction.	0.20 295.00/hr	Canda L120	NO CHARGE
	BEF	Prepared motion to quash injunction; reviewed authorities re	1.10 295.00/hr	Canda L250	\$324.50
	BEF	Prepared response to C. Curtis' motion for distribution; reviewed main case and subdocket re C. Curtis' several filings in wrong case and ensuring responses are filed in wrong case to ensure consideration; reviewed Carol Brunsting's objection to C. Curtis' request; conferred with	2.20 295.00/hr	Canda L250	\$649.00

		<u>Hrs/Rate</u>		<u>Amount</u>
2/23/2015	BEF Reviewed tax documents from reviewed IRS forms re same.	0.20 295.00/hr	Trust L310	\$59.00
2/25/2015	BEF Reviewed the trust 2013 1041 tax returns.	0.20 295.00/hr	Trust L320	\$59.00
2/26/2015	BEF Reviewed C. Curtis' response to request for disclosures and alleged damages; compared allegations to financial records and unable to reconcile; conferred with J. Ostrom re where allegations arose from; reviewed master's report and determined reviewed emails and correspondence in the federal case re	3.00 295.00/hr	Canda L110	\$885.00
	BEF Conferred with	0.80 295.00/hr	Canda L120	\$236.00
	BEF Conferred with reviewed file re same.	0.80 295.00/hr	Canda L120	\$236.00
	BEF Reviewed authorities re conferred with	0.60 295.00/hr	Canda L120	\$177.00
	BEF Prepared supplemental production.	1.30 295.00/hr	Canda L320	\$383.50

			<u>Hrs/Rate</u>		<u>Amount</u>
2/27/2015	BEF	Prepared correspondence to	0.20 295.00/hr	Litiga L110	NO CHARGE
	BEF	Reviewed the recordings of Carl Brunsting re split with D. Brunsting; compared to timeline re same.	0.50 295.00/hr	Carl L110	\$147.50
	BEF	Reviewed file and compiled exhibits re objection to C. Curtis' application for appointment as personal representative; prepared objection re same.	2.10 295.00/hr	Canda L210	\$619.50
3/4/2015	BEF	Prepared correspondence to	0.10 295.00/hr	Trust L120	\$29.50
	BEF	Prepared correspondence to J. Ostrom re filing consolidation order.	0.10 295.00/hr	Canda L250	\$29.50
3/5/2015	BEF	Prepared objection and response to C. Curtis' application for appointment as personal representative; reviewed client documents and discovery produced re same; prepared correspondence to	3.10 295.00/hr	Canda L250	\$914.50
3/9/2015	SAM	Conferred with	0.20 395.00/hr	Litiga L120	NO CHARGE
	BEF	Conferred with	0.30 295.00/hr	Canda L120	NO CHARGE
	BEF	Prepared objection and response to C. Curtis' application for appointment as personal representative; conferred with prepared exhibits re same; prepared correspondence to counsel of record re same.	1.20 295.00/hr	Canda L250	\$354.00
3/10/2015	SAM	Conferred with	0.20 395.00/hr	Trust L120	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>
3/10/2015	BEF	1.00 295.00/hr	Litiga L210	\$295.00
	BEF	0.20 295.00/hr	Litiga L210	NO CHARGE
	BEF	1.20 295.00/hr	Canda L210	\$354.00
	BEF	0.80 295.00/hr	Carl L350	\$236.00
	BEF	0.40 295.00/hr	Canda L350	\$118.00
3/11/2015	SAM	0.20 395.00/hr	Canda L120	\$79.00
	KRC	0.50 129.50/hr	Canda L140	\$64.75
	BEF	1.30 295.00/hr	Carl L350	\$383.50

		<u>Hrs/Rate</u>		<u>Amount</u>
3/11/2015	BEF	1.30 295.00/hr	Canda L350	\$383.50
	SAM	0.10 395.00/hr	Carl L350	\$39.50
3/12/2015	BEF	0.60 295.00/hr	Trust L310	\$177.00
3/13/2015	BEF	0.70 295.00/hr	Canda L120	\$206.50
	BEF	0.40 295.00/hr	Canda L310	\$118.00
	BEF	0.30 295.00/hr	Carl L310	\$88.50
3/16/2015	SAM	0.20 395.00/hr	Litiga L120	NO CHARGE

			<u>Hrs/Rate</u>	<u>Amount</u>	
3/20/2015	BEF	Conferred with	0.30 295.00/hr	Carl L110	NO CHARGE
3/23/2015	BEF	Reviewed correspondence from prepared correspondence to prepared response re same.	0.20 295.00/hr	Trust L120	NO CHARGE
	BEF	Conferred with prepared for, traveled to, attended, and returned from status conference, hearing on motion to compel, and hearing re estate administrators.	6.20 295.00/hr	Canda L230	\$1,829.00
3/24/2015	BEF	Conferred with	0.30 295.00/hr	Canda L120	NO CHARGE
	BEF	Reviewed trust instruments re distribution request by the court; conferred with	1.10 295.00/hr	Canda L120	\$324.50
3/25/2015	BEF	Reviewed correspondence from Judge Butts re third party administrator.	0.20 295.00/hr	Canda L120	\$59.00
3/26/2015	KRC	Updated pleadings index.	0.20 129.50/hr	Litiga L140	NO CHARGE
	BEF	Conferred with conferred with C. Reed re proposed third party administrators; conferred with colleagues re	1.70 295.00/hr	Canda L120	\$501.50
3/27/2015	SAM	Conferred with	0.30 395.00/hr	Canda L120	NO CHARGE
3/30/2015	BEF	Reviewed C. Curtis' substitution; conferred with J. Ostrom re same; conferred with prepared correspondence	0.90 295.00/hr	Canda L210	\$265.50

		<u>Hrs/Rate</u>	<u>Amount</u>
	to Judge Butts re update on third party administrator.		
3/30/2015	BEF Prepared correspondence to	0.10 295.00/hr	Canda L210 NO CHARGE
4/7/2015	BEF Reviewed correspondence from C. Reed re Vacek & Freed preference on proposed third party administrator; prepared response re C. Curtis terminated counsel; prepared correspondence to conferred with	0.40 295.00/hr	Canda L120 \$118.00
4/10/2015	BEF Prepared correspondence to	0.10 295.00/hr	Canda L120 NO CHARGE
4/17/2015	BEF Prepared supplemental production.	0.40 295.00/hr	Canda L320 \$118.00
5/1/2015	BEF Prepared Iowa tax documents for production.	0.20 295.00/hr	Litiga L320 \$59.00
5/5/2015	BEF Conferred with	0.20 295.00/hr	Trust L320 NO CHARGE
	BEF Conferred with C. Faber re request for tax returns.	0.20 295.00/hr	Trust L320 \$59.00
5/6/2015	BEF Prepared correspondence to	0.10 295.00/hr	Canda L310 NO CHARGE
5/13/2015	BEF Prepared supplemental production.	0.60 295.00/hr	Canda L320 \$177.00
	BEF Conferred with reviewed file and trusts re	0.80 295.00/hr	Canda L120 \$236.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
5/28/2015	SAM	Conferred with reviewed	0.40 395.00/hr	Canda L120	\$158.00
	BEF	Conferred with	0.30 295.00/hr	Carl L310	NO CHARGE
	BEF	Prepared motion for Independent Medical Examination for C. Brunsting; reviewed authorities and case files re	1.70 295.00/hr	Carl L250	\$501.50
	BEF	Prepared answers and objections to C. Curtis' interrogatories; conferred with	2.20 295.00/hr	Canda L310	\$649.00
5/29/2015	BEF	Conferred with B. Bayless re IME for Carl Brunsting, status of personal representatives for estate of Nelva and Elmer, and potential resolution of the case.	0.70 295.00/hr	Carl L160	\$206.50
	KRC	Reviewed notice of hearing; updated pleadings index.	0.20 129.50/hr	Litiga L140	\$25.90
	BEF	Reviewed pleadings and document production re no-evidence motion for summary judgment on C. Curtis' contests to the trust instruments; prepared no-evidence motion for summary judgment re same; prepared correspondence to	1.10 295.00/hr	Canda L240	\$324.50
	BEF	Reviewed pleadings and document production re no-evidence motion for summary judgment on Carl Burnsting's contests to the trust instruments; prepared no-evidence motion for summary judgment re same; prepared correspondence to	1.00 295.00/hr	Carl L240	\$295.00
	BEF	Prepared response and objections to C. Curtis' interrogatories; reviewed authorities re same and discovery limitations; prepared correspondence to	4.20 295.00/hr	Canda L310	\$1,239.00

			<u>Hrs/Rate</u>		<u>Amount</u>
		prepared correspondence to			
5/29/2015	BEF	Conferred with	0.30 295.00/hr	Canda L310	NO CHARGE
6/1/2015	BEF	Reviewed correspondence from with	0.90 295.00/hr	Canda L310	\$265.50
		conferred			
6/4/2015	BEF	Prepared answer and objection to C. Curtis' interrogatories; prepared response to C. Curtis' request for production; prepared supplemental production.	1.20 295.00/hr	Canda L310	\$354.00
	BEF	Prepared correspondence to	0.20 295.00/hr	Canda L310	NO CHARGE
6/16/2015	BEF	Reviewed correspondence from C. Curtis.	0.20 295.00/hr	Canda L120	\$59.00
6/18/2015	BEF	Prepared correspondence to	0.20 295.00/hr	Trust L320	NO CHARGE
6/19/2015	BEF	Prepared correspondence to	0.10 295.00/hr	Canda L120	NO CHARGE
	BEF	Reviewed C. Brunsting and C. Curtis stipulation and medical records for C. Brunsting.	0.50 295.00/hr	Canda L210	\$147.50
	BEF	Prepared motion for summary judgment and reviewed trusts re same; reviewed correspondence from	0.60 295.00/hr	Canda L240	\$177.00
6/23/2015	BEF	Prepared supplemental production.	1.80 295.00/hr	Canda L320	\$531.00

			<u>Hrs/Rate</u>		<u>Amount</u>
6/23/2015	BEF	Reviewed authorities re	1.20 295.00/hr	Canda L240	\$354.00
6/24/2015	SAM	Conferred with	0.30 395.00/hr	Canda L120	NO CHARGE
	BEF	Conferred with	0.20 295.00/hr	Carl L120	NO CHARGE
	BEF	Conferred with	0.20 295.00/hr	Canda L120	NO CHARGE
	SAM	Conferred with	0.30 395.00/hr	Canda L120	NO CHARGE
	BEF	Prepared no-evidence motion for summary judgment; conferred with reviewed trusts and testamentary power of appointment re changes for Carl Brunsting.	2.00 295.00/hr	Carl L240	\$590.00
	BEF	Prepared no-evidence motion for summary judgment; conferred with reviewed trusts and testamentary power of appointment re changes for C. Curtis.	2.00 295.00/hr	Canda L120	\$590.00
6/25/2015	TTT	Reviewed and revised the motion for partial summary judgment; conferred with	0.40 295.00/hr	Canda L120	\$118.00
	BEF	Conferred with	0.30 295.00/hr	Carl L240	\$88.50
	BEF	Conferred with	0.30 295.00/hr	Canda L120	\$88.50

			<u>Hrs/Rate</u>		<u>Amount</u>
6/25/2015	BEF	Prepared motion for summary judgment; conferred with reviewed authorities re	2.80 295.00/hr	Carl L240	\$826.00
		prepared correspondence to revised per correspondence.			
	BEF	Prepared motion for summary judgment; conferred with reviewed authorities	2.80 295.00/hr	Canda L240	\$826.00
		prepared correspondence to revised per			
	BEF	Prepared supplemental production; redacted and bates-labeled files re same.	1.30 295.00/hr	Canda L320	\$383.50
	BEF	Prepared supplemental production; redacted and bates-labeled files re same.	1.30 295.00/hr	Carl L320	\$383.50
6/26/2015	LGR	Prepared correspondence to C. Curtis, B. Bayless, D. Smith, and N. Spielman re A. Brunsting's supplemental production.	0.30 129.50/hr	Litiga L190	\$38.85
	BEF	Prepared no-evidence motion for summary judgment for filing; prepared e-service entries for counsel of record; reviewed file re strategy moving forward; prepared supplemental production.	1.10 295.00/hr	Canda L240	\$324.50
6/30/2015	BEF	Reviewed trust and legal authorities re prepared trial brief re same; reviewed authorities re	2.10 295.00/hr	Canda L120	\$619.50
7/1/2015	SAM	Conferred with	0.30 395.00/hr	Canda L120	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
7/1/2015	BEF	Conferred with	0.50 295.00/hr	Canda L120	\$147.50
	BEF	Conferred with D. Smith and Judge Comstock re administrator and hearing on no-evidence motion for summary judgment.	0.60 295.00/hr	Canda L120	\$177.00
	BEF	Prepared and filed expert designation.	0.40 295.00/hr	Canda L130	\$118.00
	BEF	Prepared correspondence to prepared response to prepared response to A. Covey re C. Curtis and Drina Brunsting stipulation.	0.90 295.00/hr	Canda L120	\$265.50
7/6/2015	LGR	Updated and organized client documents.	0.20 129.50/hr	Trust L140	NO CHARGE
7/7/2015	BEF	Prepared correspondence to C. Comstock re whether court will hear no-evidence motion for summary judgment in light of personal representative issue; prepared correspondence to A. Covey re same.	0.20 295.00/hr	Canda L240	\$59.00
7/9/2015	SAM	Conferred with	0.30 395.00/hr	Litiga L120	NO CHARGE
	BEF	Conferred with prepared correspondence to C. Comstock re same and re DCO.	0.50 295.00/hr	Canda L240	\$147.50
7/10/2015	SAM	Conferred with	0.40 395.00/hr	Litiga L120	\$158.00
	BEF	Reviewed Carl Brunsting's motion for summary judgment re power of appointment exercised by Nelva and specifically referenced in the trust invalid because "irrevocable" trust; conferred with	2.40 295.00/hr	Carl L240	\$708.00

			<u>Hrs/Rate</u>		<u>Amount</u>
		; reviewed authorities re prepared correspondence to C. Reed re same; prepared correspondence to Z. Foley re same.			
7/10/2015	BEF	Reviewed Carl Brunsting's second supplemental petition.	0.30 295.00/hr	Carl L210	\$88.50
7/13/2015	SAM	Conferred with	0.20 395.00/hr	Canda L310	NO CHARGE
	LGR	Reviewed and organized client documents.	0.20 129.50/hr	Trust L140	NO CHARGE
	BEF	Prepared notice of hearing on no-evidence motion for summary judgment; conferred with	0.30 295.00/hr	Canda L240	\$88.50
7/14/2015	BEF	Conferred with	0.60 295.00/hr	Litiga L120	\$177.00
	BEF	Conferred with B. Bayless re alleged improperly recorded conversations and videos; conferred with reviewed authorities cited by B. Bayless.	0.90 295.00/hr	Carl L110	\$265.50
	KRC	Reviewed notice of hearing; updated pleadings index.	0.20 129.50/hr	Canda L190	NO CHARGE
7/20/2015	BEF	Reviewed Carl Brunsting's motion for summary judgment and motion for protective order and claims re same; conferred with reviewed case file re prior counsel's production; reviewed authorities re alleged illegal recordings.	1.20 295.00/hr	Carl L240	\$354.00
	SAM	Reviewed B. Bayless motion for protection re wire tap issues.	0.30 395.00/hr	Carl L350	\$118.50
7/21/2015	BEF	Reviewed the recordings of Drina Brunsting.	0.20 295.00/hr	Carl L110	\$59.00

		<u>Hrs/Rate</u>		<u>Amount</u>
7/21/2015	BEF	5.30 295.00/hr	Canda L230	\$1,563.50
7/22/2015	BEF	0.50 295.00/hr	Carl L120	\$147.50
7/23/2015	BEF	0.50 295.00/hr	Carl L250	\$147.50
	BEF	1.10 295.00/hr	Canda L350	\$324.50
7/29/2015	BEF	0.50 295.00/hr	Carl L320	\$147.50
7/30/2015	SAM	0.20 395.00/hr	Canda L120	NO CHARGE
	BEF	2.10 295.00/hr	Carl L350	\$619.50

			<u>Hrs/Rate</u>		<u>Amount</u>
7/31/2015	BEF	Reviewed joint response to motion for protective order and conferred with	0.60 295.00/hr	Canda L350	\$177.00
8/3/2015	LGR	Prepared response to request for production.	0.30 129.50/hr	Canda L190	\$38.85
	BEF	Conferred with	0.80 295.00/hr	Canda L120	\$236.00
	BEF	Prepared for, traveled to, attended, and returned from hearing on Carl Brunsting's motion for protective order.	3.20 295.00/hr	Carl L230	\$944.00
	BEF	Reviewed and revised response to Carl Brunsting's request for production; reviewed authorities re options in light of claimed protective order; conferred with	3.60 295.00/hr	Carl L320	\$1,062.00
8/4/2015	BEF	Reviewed correspondence from C. Comstock re proposed order on protective order; conferred with prepared response and objections to proposed protective order and reviewed authorities re	2.60 295.00/hr	Canda L350	\$767.00
8/11/2015	BEF	Reviewed C. Curtis' response to motion for protective order.	0.30 295.00/hr	Canda L350	\$88.50
8/13/2015	BEF	Reviewed authorities re	0.50 295.00/hr	Carl L240	\$147.50
8/21/2015	SAM	Reviewed correspondence from B. Bayless re discovery intended for use at trial; reviewed the file re same.	0.30 395.00/hr	Carl L310	\$118.50
8/24/2015	BEF	Conferred with	0.20 295.00/hr	Trust L120	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
9/8/2015	BEF	Prepared correspondence to prepared supplemental production.	0.20 295.00/hr	Trust L110	\$59.00
9/9/2015	BEF	Conferred with	0.30 295.00/hr	Litiga L250	NO CHARGE
	BEF	Prepared response and objection to G. Lester motion to retain counsel and filed same; prepared multiple correspondence to conferred with	2.80 295.00/hr	Canda L250	\$826.00
9/10/2015	BEF	Prepared for, traveled to, attended, and returned from hearing on G. Lester's motion to retain counsel; met with G. Lester and N. Spielman post-hearing re facts of the case.	3.80 295.00/hr	Canda L230	\$1,121.00
	BEF	Conferred with	0.30 295.00/hr	Litiga L230	NO CHARGE
9/15/2015	BEF	Prepared supplemental production.	0.20 295.00/hr	Litiga L320	\$59.00
9/17/2015	SAM	Conferred twice with	0.60 395.00/hr	Canda L120	\$237.00
	BEF	Prepared for meeting with G. Lester; reviewed trust instruments, federal lawsuit, master's report, master report transcript, Carole's deposition, and source documents for master's report re same; conferred with	7.20 295.00/hr	Canda L110	\$2,124.00
9/18/2015	BEF	Conferred with	0.30 295.00/hr	Litiga L120	NO CHARGE
	BEF	Prepared for and met with G. Lester re facts of the case, amount in controversy, and estate claims.	5.50 295.00/hr	Canda L160	\$1,622.50
9/24/2015	BEF	Prepared correspondence to G. Lester confirming limited role of counsel.	0.20 295.00/hr	Canda L120	\$59.00

			<u>Hrs/Rate</u>		<u>Amount</u>
11/4/2015	BEF	Prepared correspondence to G. Lester re attorneys fees issues and value of the farm; reviewed appraisal district records and file re same.	0.90 295.00/hr	Canda L120	\$265.50
11/5/2015	BEF	Prepared correspondence to	0.20 295.00/hr	Trust L120	NO CHARGE
	BEF	Reviewed file re response to G. Lester request for appraisal and attorneys' fees issue.	0.30 295.00/hr	Canda L120	\$88.50
11/9/2015	BEF	Prepared supplemental production; prepared correspondence to G. Lester re attorneys' fees and appraisal.	0.60 295.00/hr	Canda L320	\$177.00
11/10/2015	BEF	Conferred with A. Covey re case status and mediation with Judge Butts.	0.30 295.00/hr	Litiga L120	\$88.50
1/13/2016	BEF	Prepared correspondence to	0.20 295.00/hr	Canda L120	NO CHARGE
	BEF	Prepared supplemental production.	0.20 295.00/hr	Canda L320	\$59.00
1/14/2016	SAM	Conferred with	0.20 395.00/hr	Canda L120	\$79.00
	KRC	Reviewed and organized client documents.	0.20 129.50/hr	Trust L140	NO CHARGE
	BEF	Reviewed Lester report; conferred with	0.70 295.00/hr	Canda L120	\$206.50
	BEF	Prepared correspondence to	0.20 295.00/hr	Canda L120	NO CHARGE
1/15/2016	BEF	Conferred with	0.40 295.00/hr	Canda L120	\$118.00

			<u>Hrs/Rate</u>		<u>Amount</u>
1/18/2016	BEF	Prepared correspondence to B. Bayless re Lester report; conferred with B. Bayless re mediators and status of the case.	0.60 295.00/hr	Carl L160	\$177.00
	BEF	Conferred with prepared outline of strategy issues re same.	0.70 295.00/hr	Canda L160	\$206.50
1/19/2016	KRC	Reviewed and organized client documents.	0.10 129.50/hr	Litiga L190	NO CHARGE
1/20/2016	BEF	Conferred with	0.90 295.00/hr	Canda L120	\$265.50
1/26/2016	BEF	Reviewed C. Curtis' motion for summary judgment, which completely contradicts the court appointed temporary administrator's report re trust documents.	0.30 295.00/hr	Canda L240	\$88.50
	BEF	Prepared correspondence to	0.10 295.00/hr	Canda L240	NO CHARGE
1/28/2016	BEF	Conferred with	0.60 295.00/hr	Canda L120	\$177.00
	BEF	Conferred with file re same.	0.80 295.00/hr	Canda L120	\$236.00
	BEF	Prepared correspondence to A. Covey re status of the case and mediators.	0.20 295.00/hr	Canda L120	\$59.00
1/29/2016	BEF	Prepared correspondence to	0.10 295.00/hr	Litiga L120	NO CHARGE
2/8/2016	BEF	Prepared correspondence to	0.10 295.00/hr	Litiga L120	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
2/10/2016	BEF	Reviewed E. Andell's CV and correspondence re mediators.	0.10 295.00/hr	Canda L160	\$29.50
2/19/2016	BEF	Prepared correspondence to counsel re status conference.	0.10 295.00/hr	Canda L120	\$29.50
2/24/2016	SAM	Conferred with	0.30 395.00/hr	Canda L120	\$118.50
	BEF	Met with	0.30 295.00/hr	Litiga L120	NO CHARGE
2/26/2016	SAM	Conferred with A. Covey re pending issues and mediators; prepared correspondence to A. Covey re same; reviewed correspondence from Carole Brunsting re termination of the Crain Caton representation; prepared correspondence to	0.50 395.00/hr	Litiga L190	\$197.50
3/1/2016	SAM	Reviewed the file re conferred with correspondence to with	2.30 395.00/hr	Canda L120	\$908.50
		prepared conferred			
3/2/2016	SAM	Conferred with	0.30 395.00/hr	Litiga L120	NO CHARGE
3/3/2016	SAM	Prepared file memo re pending issues.	0.50 395.00/hr	Canda L120	\$197.50
	KRC	Reviewed correspondence re motion to transfer.	0.10 129.50/hr	Litiga L190	NO CHARGE
3/4/2016	SAM	Reviewed new filings with the court.	0.30 395.00/hr	Canda L120	\$118.50
3/7/2016	SAM	Reviewed the file re production and related outstanding issues; prepared outline re same.	1.00 395.00/hr	Canda L120	\$395.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
3/8/2016	SAM	Reviewed the file re status conference hearing; prepared issue outline re same.	0.60 395.00/hr	Canda L120	\$237.00
	KRC	Prepared designation of attorney in charge; prepared correspondence to the court re same.	0.50 129.50/hr	Canda L190	NO CHARGE
3/9/2016	SAM	Prepared for, traveled to, attended, and returned from extended status conference with the court.	5.00 395.00/hr	Canda L230	\$1,975.00
	KRC	Reviewed and organized client documents; updated pleadings index.	0.20 129.50/hr	Litiga L140	NO CHARGE
3/10/2016	SAM	Reviewed correspondence from and prepared correspondence to S. Griffin re strategy issues; reviewed the file re outstanding issues; prepared	1.30 395.00/hr	Canda L120	\$513.50
	KRC	Reviewed correspondence from the court re mediation.	0.10 129.50/hr	Canda L190	NO CHARGE
3/15/2016	SAM	Reviewed correspondence from the court re mediation of the case.	0.10 395.00/hr	Canda L120	NO CHARGE
3/17/2016	SAM	Reviewed correspondence from the parties re mediation with Judge Davidson.	0.20 395.00/hr	Canda L160	\$79.00
3/18/2016	SAM	Conferred with	0.40 395.00/hr	Canda L120	\$158.00
3/19/2016	SAM	Prepared for and conferred with prepared file memo re same.	1.80 395.00/hr	Canda L120	\$711.00
3/26/2016	SAM	Reviewed correspondence from the parties re mediation of the case.	0.20 395.00/hr	Canda L120	\$79.00
3/27/2016	SAM	Reviewed multiple correspondence re mediation of the case; prepared correspondence to Judge Davidson re same.	0.20 395.00/hr	Canda L160	\$79.00

		<u>Hrs/Rate</u>		<u>Amount</u>
3/28/2016	SAM	Reviewed correspondence from	0.10 395.00/hr	Litiga L160 NO CHARGE
3/29/2016	SAM	Conferred with	0.30 395.00/hr	Litiga L160 NO CHARGE
	TJJ	conferred with	0.70 195.00/hr	Canda L160 \$136.50
3/31/2016	SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Canda L120 \$79.00
4/7/2016	SAM	Reviewed the court's file re case status.	0.20 395.00/hr	Litiga L120 NO CHARGE
4/11/2016	EJW	Reviewed case file re report of temporary administrator pending contest	0.30 250.00/hr	Canda L190 NO CHARGE
4/16/2016	SAM	Reviewed correspondence from C. Curtis re motion for sanctions; reviewed same.	0.50 395.00/hr	Canda L250 \$197.50
4/24/2016	SAM	Reviewed correspondence from prepared correspondence to C. Curtis re same.	0.40 395.00/hr	Canda L120 \$158.00
4/26/2016	SAM	Reviewed correspondence from B. Bayless re trust accounting; prepared correspondence to B. Bayless and other beneficiaries re same.	0.30 395.00/hr	Trust L120 \$118.50
4/29/2016	SAM	Prepared correspondence to and reviewed correspondence from prepared outline re accounting update and document production.	0.50 395.00/hr	Canda L120 \$197.50
5/3/2016	SAM	Met with file memo re same.	1.50 395.00/hr	Canda L120 \$592.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
5/4/2016	SAM	Conferred with conferred with reviewed the production to date; prepared correspondence to the parties re same.	1.50 395.00/hr	Canda L310	\$592.50
	TJJ	Prepared spreadsheet re trust distribution analysis; conferred with	1.70 195.00/hr	Canda L440	\$331.50
5/5/2016	TJJ	Prepared spreadsheet re trust distribution analysis.	2.90 195.00/hr	Canda L440	\$565.50
5/10/2016	SAM	Reviewed bank, brokerage, and tax documents produced by prepared correspondence to prepared correspondence to the parties re same	2.70 395.00/hr	Canda L310	\$1,066.50
	TJJ	Reviewed file to confirm and update documents produced and to be produced.	2.50 195.00/hr	Canda L320	\$487.50
5/11/2016	TJJ	Reviewed file to confirm and update documents produced and to be produced.	2.00 195.00/hr	Canda L320	\$390.00
5/12/2016	TJJ	Reviewed file to confirm and update documents produced and to be produced; prepared file memo re same.	1.50 195.00/hr	Canda L320	\$292.50
5/13/2016	TJJ	Reviewed file to confirm and update documents produced and to be produced; prepared file memo re same.	2.10 195.00/hr	Canda L320	\$409.50
5/16/2016	SAM	Reviewed correspondence from reviewed same; reviewed documents to be produced to the parties.	0.60 395.00/hr	Canda L310	\$237.00
	TJJ	Reviewed file to confirm and update documents produced and to be produced; reviewed correspondence from	0.70 195.00/hr	Canda L320	\$136.50

		<u>Hrs/Rate</u>		<u>Amount</u>
5/16/2016	EJW Reviewed correspondence from R. Munson re settlement agreement.	0.10 250.00/hr	Canda L190	NO CHARGE
5/17/2016	SAM Reviewed and organized documents to be produced to the parties; prepared correspondence to the parties re same.	1.30 395.00/hr	Canda L310	\$513.50
	TJJ Reviewed file to confirm and update documents produced and to be produced; prepared correspondence re production of Bank of America account statements; prepared account statements to be produced.	2.40 195.00/hr	Canda L320	\$468.00
5/18/2016	SAM Reviewed, organized, and produced the Bank of America statements to the parties.	0.30 395.00/hr	Canda L310	\$118.50
	EJW Reviewed file re outstanding issues and C. Curtis filing.	0.40 250.00/hr	Canda L190	\$100.00
	TJJ Prepared correspondence to all parties re production of account statements.	0.40 195.00/hr	Trust L320	\$78.00
5/19/2016	SAM Prepared correspondence to reviewed documents to produce to the other parties; prepared correspondence to	0.50 395.00/hr	Canda L310	\$197.50
	KSM Prepared bates labels for the document production.	1.50 129.50/hr	Canda L140	\$194.25
5/20/2016	SAM Conferred several times with	0.40 395.00/hr	Canda L310	NO CHARGE
	KSM Prepared bates labels for the document production; conferred with	1.20 129.50/hr	Canda L140	\$155.40
5/23/2016	SAM Reviewed and organized documents to be produced to all parties; prepared correspondence to the parties re same.	4.30 395.00/hr	Canda L310	\$1,698.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
5/23/2016	KSM	Prepared bate labels for the document production.	3.00 129.50/hr	Canda L140	\$388.50
5/24/2016	SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re production of documents.	0.20 395.00/hr	Carl L310	NO CHARGE
6/1/2016	SAM	Reviewed correspondence from Judge Davidson re mediation of the case; reviewed correspondence from B. Bayless re same.	0.20 395.00/hr	Litiga L160	\$79.00
6/4/2016	SAM	Reviewed the file re status of production of bank and brokerage statements; prepared correspondence to	0.20 395.00/hr	Litiga L310	\$79.00
6/5/2016	SAM	Prepared correspondence to and reviewed correspondence from	0.20 395.00/hr	Canda L310	NO CHARGE
6/7/2016	SAM	Reviewed the file re documents to produce to the parties; organized same.	0.50 395.00/hr	Canda L310	\$197.50
6/11/2016	SAM	Reviewed the May 2016 bank and brokerage statements; prepared correspondence to the parties re production of same; reviewed correspondence from D. Munson re execution of the settlement agreement.	0.80 395.00/hr	Canda L310	\$316.00
6/13/2016	SAM	Reviewed the temporary administrator's report; reviewed the file re outstanding issues; reviewed the E. Brunsting administration; prepared outline re pending issues.	0.50 395.00/hr	Canda L120	\$197.50
	TJJ	Prepared settlement agreement re trust dispersals.	2.40 195.00/hr	Canda L250	\$468.00
6/14/2016	TJJ	Prepared settlement agreement re trust dispersals; reviewed pleadings and prepared a file memo re claims for motion for summary judgment.	1.90 195.00/hr	Canda L250	\$370.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
6/16/2016	SAM	Reviewed the file re mediation issues; prepared correspondence to	0.20 395.00/hr	Litiga L160	NO CHARGE
6/17/2016	SAM	Conferred with reviewed correspondence from and prepared correspondence to	0.60 395.00/hr	Canda L160	\$237.00
	EJW	Conferred with	0.20 250.00/hr	Litiga L190	NO CHARGE
6/20/2016	EJW	Reviewed the file re outstanding issues; revised the mediation memo.	2.10 250.00/hr	Canda L190	\$525.00
6/21/2016	SAM	Conferred with the court reporter re hearing transcripts requested by C. Curtis; prepared correspondence to the court reporter re same.	0.20 395.00/hr	Canda L120	\$79.00
	EJW	Revised the mediation memo.	0.70 250.00/hr	Canda L190	\$175.00
	SPA	Prepared correspondence to the court re trial transcript request.	0.40 129.50/hr	Canda L190	\$51.80
6/22/2016	SAM	Reviewed and revised the settlement agreement.	1.00 395.00/hr	Canda L120	\$395.00
	EJW	Revised the settlement agreement and mediation memo.	1.20 250.00/hr	Canda L320	\$300.00
6/25/2016	NM	Prepared the settlement agreement.	1.00 129.50/hr	Canda L120	\$129.50
6/27/2016	SAM	Reviewed correspondence from	0.20 395.00/hr	Canda L120	NO CHARGE
	EJW	Revised the mediation memo.	0.40 250.00/hr	Canda L190	\$100.00

		<u>Hrs/Rate</u>		<u>Amount</u>
6/29/2016	SAM Reviewed correspondence from and prepared correspondence to all parties re the mediation.	0.20 395.00/hr	Canda L120	\$79.00
6/30/2016	SAM Conferred with prepared correspondence reviewed accounting documents produced by	1.30 395.00/hr	Canda L160	\$513.50
7/1/2016	SAM Reviewed bank and brokerage statements from reviewed the updated accounting.	0.60 395.00/hr	Trust L310	\$237.00
7/5/2016	SAM Reviewed correspondence from Carole Brunsting re unavailability for the mediation; conferred with prepared correspondence to Carole Brunsting re same; reviewed the 2012 federal lawsuit.	1.00 395.00/hr	Litiga L160	\$395.00
7/6/2016	SAM Reviewed correspondence from reviewed the file re same.	0.80 395.00/hr	Trust L120	\$316.00
	SAM Reviewed correspondence from and prepared correspondence to Judge Davidson's office re the need to reschedule the mediation; reviewed correspondence from and prepared correspondence to B. Bayless re same; reviewed correspondence from and prepared correspondence to reviewed correspondence from	0.80 395.00/hr	Canda L160	\$316.00
7/7/2016	SAM Reviewed correspondence from reviewed correspondence from C. Curtis re Rule 60(b) motion in the 2012 federal court case; prepared correspondence to all parties re same; reviewed correspondence from and prepared correspondence to	0.80 395.00/hr	Canda L120	\$316.00
7/9/2016	SAM Reviewed and organized documents produced in the case; determined additional documents to be produced.	0.60 395.00/hr	Canda L310	\$237.00

		<u>Hrs/Rate</u>		<u>Amount</u>
7/12/2016	SAM Reviewed documents to produce.	0.30 395.00/hr	Canda L120	\$118.50
7/19/2016	SAM Prepared correspondence to all parties re mediation of the case with Judge Davidson.	0.20 395.00/hr	Canda L160	\$79.00
7/26/2016	SAM Reviewed correspondence from and prepared correspondence to all parties re an August mediation; prepared correspondence to	0.50 395.00/hr	Canda L120	\$197.50
7/27/2016	SAM Reviewed the file re mediation issue; prepared correspondence to all parties re same.	0.30 395.00/hr	Canda L160	\$118.50
7/28/2016	SAM Prepared correspondence to prepared correspondence to	0.30 395.00/hr	Canda L160	\$118.50
7/29/2016	SAM Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L120	NO CHARGE
8/3/2016	SAM Prepared correspondence to	0.20 395.00/hr	Canda L160	\$79.00
8/4/2016	SAM Reviewed Rule 60(b) and motion for sanctions filed by C. Curtis in the federal court case.	0.30 395.00/hr	Canda L120	\$118.50
8/11/2016	SAM Conferred with reviewed correspondence from Z. Foley re same.	0.70 395.00/hr	Canda L160	\$276.50
8/25/2016	SAM Reviewed and organized documents produced and to be produced; conferred with	0.30 395.00/hr	Canda L390	\$118.50
	TJJ Conferred with reviewed and organized documents produced and to be produced.	0.40 195.00/hr	Canda L390	\$78.00
8/26/2016	SAM Reviewed and organized documents produced and to be produced; conferred with	1.00 395.00/hr	Canda L390	\$395.00

		<u>Hrs/Rate</u>		<u>Amount</u>
8/26/2016	TJJ Reviewed and organized documents produced and to be produced; conferred with	1.80 195.00/hr	Canda L390	\$351.00
8/29/2016	SAM Reviewed documents produced by	0.80 395.00/hr	Canda L310	\$316.00
	TJJ Reviewed and organized documents produced and to be produced.	7.20 195.00/hr	Canda L390	\$1,404.00
8/30/2016	SAM Reviewed and organized documents to be produced.	0.30 395.00/hr	Canda L120	\$118.50
	TJJ Reviewed and organized documents produced and to be produced.	4.00 195.00/hr	Canda L390	\$780.00
8/31/2016	TJJ Reviewed and organized documents produced and to be produced;	8.10 195.00/hr	Canda L390	\$1,579.50
9/1/2016	TJJ Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	8.70 195.00/hr	Canda L390	\$1,696.50
9/2/2016	TJJ Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	7.50 195.00/hr	Canda L390	\$1,462.50
9/6/2016	TJJ Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	6.10 195.00/hr	Canda L390	\$1,189.50
9/14/2016	SAM Reviewed the file re documents to produce.	0.50 395.00/hr	Canda L320	\$197.50
9/20/2016	TJJ Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	4.40 195.00/hr	Canda L390	\$858.00
9/21/2016	SAM Reviewed correspondence from and prepared correspondence to reviewed correspondence from and conferred with reviewed the	0.80 395.00/hr	Litiga L120	\$316.00

		<u>Hrs/Rate</u>		<u>Amount</u>
	prior court orders re same; prepared correspondence to reviewed reorganization of the produced documents.			
9/21/2016 TJJ	Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	4.00 195.00/hr	Canda L390	\$780.00
TJJ	Reviewed the court orders re taxes and the farm lease; prepared memo re same; conferred with	3.00 195.00/hr	Litiga L190	\$585.00
9/22/2016 SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Trust L120	NO CHARGE
TJJ	Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	6.80 195.00/hr	Canda L390	\$1,326.00
9/26/2016 TJJ	Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	5.50 195.00/hr	Canda L390	\$1,072.50
9/27/2016 TJJ	Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	5.00 195.00/hr	Canda L390	\$975.00
9/28/2016 TJJ	Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	3.90 195.00/hr	Canda L390	\$760.50
9/29/2016 TJJ	Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	3.10 195.00/hr	Canda L390	\$604.50
9/30/2016 SAM	Met with	0.30 395.00/hr	Canda L120	\$118.50

		<u>Hrs/Rate</u>		<u>Amount</u>
9/30/2016	TJJ Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	0.50 195.00/hr	Canda L390	\$97.50
10/3/2016	TJJ Reviewed and organized all document received and/or produced to date re accounting issues, the parties, all claims, and in preparation for trial.	0.60 195.00/hr	Canda L390	\$117.00
10/13/2016	SAM Conferred with	0.20 395.00/hr	Trust L310	\$79.00
10/18/2016	SAM Reviewed the file re accounting update to produce.	0.50 395.00/hr	Trust L150	\$197.50
11/8/2016	SAM Conferred with ; reviewed same.	0.50 395.00/hr	Canda L310	\$197.50
	TJJ Reviewed and organized documents to produce re accounting update; prepared correspondence to A. Brunsting, Carole Brunsting, C. Curtis, and Carl Brunsting re same.	1.80 195.00/hr	Litiga L390	\$351.00
	KSM Conferred with	3.00 129.50/hr	Canda L140	\$388.50
11/14/2016	SAM Reviewed the file re accounting updates to provide; prepared correspondence to	0.30 395.00/hr	Trust L310	\$118.50
11/17/2016	SAM Reviewed correspondence from and prepared correspondence to N. Spielman and B. Bayless re settlement conference.	0.20 395.00/hr	Carl L160	\$79.00
11/21/2016	SAM Prepared for, attended, and returned from the	1.50 395.00/hr	Carl L160	\$592.50
11/22/2016	TJJ Reviewed Carl Brunsting's motion for summary judgment; prepared file memo re same.	1.00 195.00/hr	Carl L240	\$195.00

		<u>Hrs/Rate</u>		<u>Amount</u>
11/28/2016	TJJ Prepared correspondence to Carl, Candace, Carole, and Amy Brunsting re June, July and August bank statements.	0.40 195.00/hr	Trust L190	\$78.00
12/6/2016	TJJ Reviewed Carl Brunsting's motion for summary judgment; prepared motion for summary judgment re no contest clause.	1.30 195.00/hr	Carl L240	\$253.50
12/7/2016	SAM Reviewed correspondence from B. Bayless and N. Spielman re scheduling issues; reviewed the court's electronic docket sheet re same.	0.20 395.00/hr	Carl L190	\$79.00
	TJJ Prepared motion for summary judgment re no contest clause.	1.00 195.00/hr	Canda L240	\$195.00
12/8/2016	SAM Reviewed the file re discovery produced and to be produced.	0.50 395.00/hr	Litiga L310	\$197.50
12/27/2016	SAM Conferred with reviewed same; reviewed correspondence from C. Brunsting re interim distribution; prepared correspondence to prepared correspondence to	1.20 395.00/hr	Trust L120	\$474.00
	TJJ Prepared correspondence to Carole Brunsting, Carl Brunsting, Candace Curtis, and Amy Brunsting re accounting update for June-September 2016.	0.40 195.00/hr	Trust L320	\$78.00
	TJJ Reviewed the Qualified Beneficiary Designation re distributions; reviewed the orders re same; conferred with	1.00 195.00/hr	Canda L250	\$195.00
12/28/2016	SAM Reviewed correspondence from and prepared correspondence to ; prepared correspondence to prepared correspondence to Carole Brunsting re same.	0.80 395.00/hr	Litiga L120	\$316.00

			<u>Hrs/Rate</u>		<u>Amount</u>
12/29/2016	SAM	Prepared correspondence to Carole Brunsting re her demand for distribution; reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Litiga L120	\$118.50
1/6/2017	SAM	Reviewed the file re accounting records to produce.	0.50 395.00/hr	Trust L320	\$197.50
	TJJ	Conferred with	0.20 195.00/hr	Trust L150	NO CHARGE
	KSM	Conferred with reviewed and organized documents for production.	2.00 129.50/hr	Canda L140	\$259.00
1/30/2017	SAM	Reviewed correspondence from C. Brunsting re production of accounting records; reviewed the file re same.	0.20 395.00/hr	Trust L320	\$79.00
1/31/2017	SAM	Reviewed the accounting records to produce; conferred with	2.40 395.00/hr	Trust L320	\$948.00
	TJJ	Conferred with conferred with	0.30 195.00/hr	Trust L390	NO CHARGE
	ML	Reviewed and organized documents for production; conferred with	1.00 129.50/hr	Canda L190	\$129.50
2/9/2017	SAM	Reviewed and organized documents for production for the Brunsting parties.	0.30 395.00/hr	Canda L120	\$118.50
2/10/2017	SAM	Reviewed and organized documents for production for the Brunsting parties.	0.30 395.00/hr	Canda L120	\$118.50
2/13/2017	SAM	Conferred with reviewed the file re same.	0.50 395.00/hr	Trust L310	\$197.50
	TJJ	Prepared correspondence to C. Curtis, Carol Brunsting, Carl Brunsting, and Amy Brunsting re accounting update for June to September 2016; reviewed the	1.80 195.00/hr	Trust L320	\$351.00

		<u>Hrs/Rate</u>		<u>Amount</u>
	conferred with			
2/15/2017	TJJ Prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re accounting update for September 2016 to February 2017.	1.00 195.00/hr	Trust L320	\$195.00
2/17/2017	TJJ Revised correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re accounting update for June to September 2016.	0.40 195.00/hr	Trust L320	\$78.00
2/18/2017	SAM Reviewed the accounting to be updated; prepared file memo to	0.30 395.00/hr	Trust L150	\$118.50
2/21/2017	SAM Conferred several times with	0.80 395.00/hr	Trust L320	\$316.00
	reviewed same; prepared correspondence to the parties re same; prepared correspondence to			
	TJJ Prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re June 2016 to February 2017 accounting updates; reviewed and organized the financial statements to be produced; conferred with	2.50 195.00/hr	Trust L320	\$487.50
2/22/2017	SAM Reviewed and revised the document production.	0.30 395.00/hr	Canda L320	\$118.50
	TJJ Prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting re accounting update for September 2016 to February 2017.	0.60 195.00/hr	Trust L320	\$117.00
2/23/2017	SAM Reviewed the revised accounting to be produced to the Brunsting parties; conferred with reviewed correspondence from C. Brunsting re same.	0.60 395.00/hr	Trust L110	\$237.00

		<u>Hrs/Rate</u>		<u>Amount</u>
2/23/2017	TJJ Review correspondence from Carole Brunsting re account updates; prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re accounting update for September 2016 to January 2017.	1.80 195.00/hr	Trust L320	\$351.00
2/24/2017	SAM Reviewed and organized the financial records to produce; prepared master correspondence to the parties re same.	2.80 395.00/hr	Trust L120	\$1,106.00
	TJJ Prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting.	1.10 195.00/hr	Litiga L320	NO CHARGE
2/27/2017	SAM Reviewed correspondence from and prepared correspondence to C. Brunsting re accounting documents.	0.20 395.00/hr	Trust L310	\$79.00
3/1/2017	SAM Reviewed correspondence from C. Brunsting re accounting records.	0.20 395.00/hr	Trust L310	\$79.00
3/2/2017	SAM Reviewed and organized the accounting records; prepared correspondence to the Brunsting parties re same; conferred several times with	2.00 395.00/hr	Trust L150	\$790.00
	TJJ Prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting re accounting update for September 2016 to November 2016; conferred with	1.00 195.00/hr	Trust L320	\$195.00
3/3/2017	SAM Revised correspondence to the parties re the December 2016 and January 2017 accounting records.	0.30 395.00/hr	Trust L120	\$118.50
	TJJ Prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting re accounting update for December 2016 and January 2017.	0.80 195.00/hr	Trust L320	\$156.00

			<u>Hrs/Rate</u>		<u>Amount</u>
3/24/2017	SAM	Reviewed correspondence from Carole Brunsting re discovery issues; reviewed the file re same.	0.20 395.00/hr	Litiga L310	\$79.00
3/28/2017	SAM	Reviewed correspondence from and prepared correspondence to Carole Brunsting re trust disbursement issues.	0.20 395.00/hr	Trust L120	\$79.00
4/11/2017	SAM	Reviewed correspondence from the CPA re tax returns; reviewed correspondence from	0.30 395.00/hr	Trust L120	\$118.50
4/17/2017	TJJ	Reviewed and organized bank, stock, and tax documents re accounting update.	1.60 195.00/hr	Trust L150	\$312.00
4/19/2017	SAM	Reviewed correspondence from and prepared correspondence to C. Brunsting re distribution issues; reviewed the file re same; prepared correspondence to	0.80 395.00/hr	Trust L120	\$316.00
	SAM	Conferred with	0.20 395.00/hr	Trust L120	NO CHARGE
5/1/2017	SAM	Conferred with	0.20 395.00/hr	Trust L150	NO CHARGE
	TJJ	Conferred with	2.90 195.00/hr	Trust L320	\$565.50
		Reviewed and revised same; prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re tax documents and accounting summary; conferred with			
5/2/2017	SAM	Reviewed the accounting update for the first quarter of 2017; prepared correspondence to all parties re same.	0.60 395.00/hr	Trust L310	\$237.00

		<u>Hrs/Rate</u>		<u>Amount</u>
5/5/2017	SAM Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Trust L120	NO CHARGE
5/12/2017	SAM Reviewed correspondence from and prepared correspondence to Carole Brunsting re distribution issues.	0.30 395.00/hr	Trust L120	\$118.50
5/16/2017	SAM Conferred with ; conferred with	1.20 395.00/hr	Litiga L120	\$474.00
5/18/2017	SAM Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Litiga L120	NO CHARGE
5/24/2017	SAM Reviewed correspondence from and prepared correspondence to A. and Carole Brunsting re settlement conference.	0.20 395.00/hr	Litiga L120	\$79.00
5/25/2017	SAM Reviewed correspondence from and prepared correspondence to A. and Carole Brunsting re meeting; prepared correspondence to	0.30 395.00/hr	Litiga L120	\$118.50
5/30/2017	SAM Reviewed the court's file re status; prepared correspondence to reviewed correspondence from B. Bayless re settlement.	0.30 395.00/hr	Carl L120	\$118.50
6/9/2017	SAM Prepared for and attended a settlement conference with Carole Brunsting and Anita Brunsting.	2.50 395.00/hr	Litiga L160	\$987.50
6/23/2017	SAM Reviewed multiple correspondence from and prepared multiple correspondence to B. Bayless re tolling agreement; conferred with reviewed and revised the tolling agreement; prepared correspondence to B. Bayless re same.	1.00 395.00/hr	Carl L190	\$395.00

			<u>Hrs/Rate</u>		<u>Amount</u>
7/13/2017	SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re tolling agreement.	0.20 395.00/hr	Carl L120	\$79.00
8/1/2017	SAM	Conferred with	0.30 395.00/hr	Litiga L120	NO CHARGE
9/15/2017	SAM	Conferred with conferred with prepared correspondence to Carole Brunsting re same; conferred with Carole Brunsting re same.	1.30 395.00/hr	Litiga L120	\$513.50
9/20/2017	SAM	Conferred with	0.20 395.00/hr	Trust L120	NO CHARGE
	SAM	Reviewed the file re pending issues and the accounting.	0.20 395.00/hr	Trust L120	\$79.00
10/24/2017	SAM	Conferred with	0.20 395.00/hr	Litiga L120	NO CHARGE
12/14/2017	EJW	Conferred with reviewed the file re same and work assignments.	0.50 250.00/hr	Canda L120	NO CHARGE
	SAM	Reviewed correspondence from J. Young re the temporary administrator's fees and court approval re same; reviewed the court's file re same; conferred with	0.70 395.00/hr	Canda L120	\$276.50
12/15/2017	SAM	Prepared correspondence to all beneficiaries re proposed distributions; conferred with reviewed correspondence from and prepared correspondence to J. Young re fee disbursements for G. Lester and her firm; reviewed the file re same.	1.70 395.00/hr	Canda L120	\$671.50
12/16/2017	SAM	Reviewed correspondence from J. Young re fees to the temporary administrator.	0.20 395.00/hr	Canda L120	\$79.00

			<u>Hrs/Rate</u>		<u>Amount</u>
12/18/2017	SAM	Reviewed correspondence from and prepared correspondence to	0.50 395.00/hr	Canda L120	\$197.50
2/9/2018	SAM	Reviewed correspondence from C. Brunsting re accounting update; reviewed the file re same; prepared correspondence to conferred with	0.40 395.00/hr	Trust L120	\$158.00
	TJJ	Reviewed file re last accounting update; reviewed	0.60 195.00/hr	Trust L150	\$117.00
	TJJ	Conferred with	0.20 195.00/hr	Trust L150	NO CHARGE
2/10/2018	SAM	Reviewed correspondence from	0.20 395.00/hr	Trust L120	\$79.00
2/28/2018	EJW	Conferred with	0.20 250.00/hr	Trust L120	NO CHARGE
	SAM	Conferred with	0.20 395.00/hr	Trust L120	\$79.00
3/1/2018	TJJ	Reviewed file re trust accounting update; reviewed correspondence from reviewed and organized bank and stock statements from prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re same.	2.60 195.00/hr	Trust L150	\$507.00
	SAM	Conferred with	0.30 395.00/hr	Trust L150	\$118.50
	TJJ	Conferred with	0.30 195.00/hr	Trust L150	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>
3/2/2018	TJJ Prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re trust accounting updates; reviewed and organized trust bank and stock statements re same.	3.40 195.00/hr	Trust L150	\$663.00
3/7/2018	SAM Reviewed the accounting records and production of same.	0.30 395.00/hr	Trust L150	\$118.50
3/8/2018	NM Prepared multiple correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and A. Brunsting re accounting update from April 2017 through May 2018.	1.60 129.50/hr	Trust L150	\$207.20
	SAM Reviewed and revised the probate accounting for the time periods April 2017 through May 2018.	1.00 395.00/hr	Trust L150	\$395.00
3/9/2018	SAM Reviewed the accounting to be produced; reviewed correspondence from and prepared correspondence B. Bayless re payment of the temporary administrator fees.	0.60 395.00/hr	Trust L150	\$237.00
3/10/2018	SAM Reviewed correspondence from and prepared correspondence to B. Bayless re fees paid to the temporary administrator.	0.20 395.00/hr	Trust L190	\$79.00
3/19/2018	SAM Reviewed the accounting records; conferred with	0.50 395.00/hr	Trust L150	\$197.50
	TJJ Reviewed and organized all records re trust accounting.	4.50 195.00/hr	Trust L150	\$877.50
	TJJ Conferred with	0.30 195.00/hr	Trust L150	NO CHARGE
3/20/2018	SAM Conferred several times with reviewed and organized same.	1.20 395.00/hr	Trust L150	\$474.00

			<u>Hrs/Rate</u>		<u>Amount</u>
3/20/2018	TJJ	Reviewed and organized all trust accounting documents; reviewed Anita and Amy Brunsting's prior production re same.	6.00 195.00/hr	Trust L320	\$1,170.00
	TJJ	Conferred with	0.50 195.00/hr	Trust L320	NO CHARGE
3/27/2018	TJJ	Reviewed and organized client documents re accounting updates and prior production.	0.70 195.00/hr	Trust L320	\$136.50
3/28/2018	TJJ	Reviewed and organized client documents re accounting updates and prior production.	0.50 195.00/hr	Trust L320	\$97.50
4/2/2018	TJJ	Reviewed and organized client documents re accounting updates and prior production.	0.50 195.00/hr	Trust L320	\$97.50
5/23/2018	SAM	Met with	0.30 395.00/hr	Litiga L120	\$118.50
6/26/2018	SAM	Reviewed and executed the tolling agreement for B. Bayless; processed the execution of the tolling agreement; prepared correspondence to B. Bayless and N. Spielman re same; prepared correspondence to	1.00 395.00/hr	Carl L120	\$395.00
	SAM	Reviewed correspondence from and prepared to Carole Brunsting re meeting.	0.20 395.00/hr	Litiga L160	\$79.00
6/27/2018	SAM	Met with Carole Brunsting re settlement.	1.50 395.00/hr	Litiga L160	\$592.50
6/28/2018	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to B. Bayless and N. Spielman re the tolling agreement; reviewed and executed the tolling agreement for Carl Brunsting.	0.60 395.00/hr	Carl L190	\$237.00
7/12/2018	TJJ	Reviewed correspondence from reviewed client documents re same.	0.60 195.00/hr	Trust L150	\$117.00

			<u>Hrs/Rate</u>		<u>Amount</u>
7/12/2018	SAM	Reviewed the file re accounting issues.	0.20 395.00/hr	Trust L150	\$79.00
7/23/2018	SAM	Reviewed correspondence from	0.20 395.00/hr	Trust L320	\$79.00
7/31/2018	MT	Updated litigation index re Carl Brunsting's partial motion for summary judgment; reviewed and prepared docket matters re same.	0.30 129.50/hr	Carl L240	\$38.85
8/10/2018	TJJ	Reviewed Carl Brunsting's partial motion for summary judgment.	0.50 195.00/hr	Carl L240	\$97.50
	SAM	Conferred with	0.30 395.00/hr	Carl L240	\$118.50
	TJJ	Conferred with	0.30 195.00/hr	Carl L240	NO CHARGE
8/13/2018	TJJ	Reviewed and bates-labeled trust accounting documents from Anita Brunsting; prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re trust accounting update.	3.30 195.00/hr	Trust L320	\$643.50
8/15/2018	TJJ	Prepared Anita Brunsting's response to Carl Brunsting's partial motion for summary judgment.	0.50 195.00/hr	Carl L240	\$97.50
8/16/2018	TJJ	Prepared Anita Brunsting's response to Carl Brunsting's motion for partial summary judgment; reviewed trust documents re same; reviewed authorities re	4.20 195.00/hr	Carl L240	\$819.00
8/20/2018	TJJ	Reviewed C. Curtis' plea in abatement re Carl Brunsting's motion for partial summary judgment.	0.30 195.00/hr	Carl L240	\$58.50
	MT	Updated litigation index re plea in abatement.	0.20 129.50/hr	Litiga L210	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>
8/24/2018	TJJ	1.40 195.00/hr	Carl L240	\$273.00
	MT	0.20 129.50/hr	Carl L240	NO CHARGE
	SAM	0.20 395.00/hr	Trust L150	\$79.00
	SAM	0.40 395.00/hr	Carl L240	\$158.00
	TJJ	0.20 195.00/hr	Carl L240	NO CHARGE
8/27/2018	TJJ	0.30 195.00/hr	Trust L320	\$58.50
	TJJ	2.30 195.00/hr	Carl L240	\$448.50
	SAM	0.80 395.00/hr	Carl L240	\$316.00
	SAM	0.50 395.00/hr	Trust L320	\$197.50

		<u>Hrs/Rate</u>		<u>Amount</u>
8/28/2018	TJJ	4.60 195.00/hr	Carl L240	\$897.00
	SAM	1.50 395.00/hr	Carl L240	\$592.50
	TJJ	0.40 195.00/hr	Carl L240	NO CHARGE
8/29/2018	TJJ	3.60 195.00/hr	Carl L240	\$702.00
	MT	0.10 129.50/hr	Carl L240	NO CHARGE
	SAM	1.20 395.00/hr	Carl L240	\$474.00
8/30/2018	TJJ	0.50 195.00/hr	Carl L240	\$97.50
	MT	0.10 129.50/hr	Carl L240	NO CHARGE
9/4/2018	TJJ	0.00 195.00/hr	Canda L240	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>	
9/4/2018	MT	Updated litigation index re addendum to plea in abatement; reviewed court's docket re motion for continuance and motion for summary judgment hearing.	0.20 129.50/hr	Carl L250	NO CHARGE
	SAM	Conferred with reviewed the file re same.	0.70 395.00/hr	Canda L120	\$276.50
	TJJ	Conferred with	0.50 195.00/hr	Canda L210	NO CHARGE
	TJJ	Prepared for hearing re Carl Brunsting's partial motion for summary judgment; conferred with reviewed Carl Brunsting's response to defendants' joint motion for continuance; reviewed Carl Brunsting's objection to exhibit A to defendants' joint response to Carl Brunsting's partial motion for summary judgment; prepared proposed docket control order.	2.80 195.00/hr	Carl L240	\$546.00
9/5/2018	TJJ	Prepared for, traveled to, attended, and returned from court re oral hearing on Carl Brunsting's motion for partial summary judgment and defendant's motion for continuance re same.	3.70 195.00/hr	Carl L230	\$721.50
	MT	Updated litigation index; conferred with Judge Davidson's office re mediation availability.	0.50 129.50/hr	Carl L160	\$64.75
	SAM	Prepared for, traveled to, attended, and returned from court re hearing on motions for continuance and Carl Brunsting's motion for summary judgment; conferred with B. Bayless and	3.70 395.00/hr	Carl L230	\$1,461.50
	SAM	Reviewed the file re conference with N. Spielman and B. Bayless; prepared correspondence to and reviewed correspondence from N. Spielman and B. Bayless re settlement and scheduling issues.	0.80 395.00/hr	Carl L160	\$316.00

		<u>Hrs/Rate</u>		<u>Amount</u>
9/7/2018	SAM	0.50 395.00/hr	Carl L250	\$197.50
	Attended telephone conference with B. Bayless and N. Spielman re scheduling issues per the court's instructions; reviewed correspondence from Judge Comstock re same; prepared correspondence to and reviewed correspondence from			
	TJJ	0.50 195.00/hr	Litiga L120	NO CHARGE
	Conferred with reviewed the court's orders re same.			
9/11/2018	SAM	2.20 395.00/hr	Carl L250	\$869.00
	Reviewed and revised the docket control order; prepared correspondence to N. Spielman and B. Bayless re same; attended conference call with N. Spielman and B. Bayless re scheduling issues; conferred with			
	TJJ	0.70 195.00/hr	Litiga L250	NO CHARGE
	Conferred with			
9/13/2018	SAM	0.30 395.00/hr	Carl L250	\$118.50
	Reviewed and revised the proposed docket control order; prepared correspondence to N. Spielman and B. Bayless re same.			
9/14/2018	SAM	0.60 395.00/hr	Carl L250	\$237.00
	Reviewed and revised the proposed docket control order; prepared correspondence to all parties re same; revised the docket control order; prepared correspondence to all parties re amended version.			
9/15/2018	SAM	0.40 395.00/hr	Canda L250	\$158.00
	Prepared correspondence to all parties re the docket control order; reviewed correspondence from and prepared correspondence to C. Curtis re same.			
9/16/2018	SAM	0.20 395.00/hr	Canda L250	\$79.00
	Reviewed correspondence from and prepared correspondence to			
9/20/2018	TJJ	0.10 195.00/hr	Litiga L160	NO CHARGE
	Reviewed correspondence from Carole Brunsting re opposition to mediation.			

		<u>Hrs/Rate</u>		<u>Amount</u>	
9/25/2018	MT	Reviewed file memo for docket control order; conferred with Judge Davidson's assistant re mediation dates.	0.30 129.50/hr	Canda L160	\$38.85
	SAM	Reviewed correspondence from prepared correspondence to the court re the docket control order and mediation of the case.	0.40 395.00/hr	Canda L160	\$158.00
10/9/2018	SAM	Met with prepared correspondence to Judge Comstock re pending issues; prepared correspondence to	1.50 395.00/hr	Canda L120	\$592.50
10/10/2018	SAM	Prepared for and attended conference call with B. Bayless and N. Spielman re settlement issues.	0.70 395.00/hr	Carl L160	\$276.50
10/11/2018	SAM	Prepared correspondence to the Brunsting family re appraisal fees.	0.30 395.00/hr	Trust L120	\$118.50
10/13/2018	SAM	Reviewed the file re depositions to schedule; prepared correspondence to the parties re same.	0.40 395.00/hr	Canda L330	\$158.00
	SAM	Prepared correspondence to the parties re the Iowa farm appraisals.	0.20 395.00/hr	Trust L310	\$79.00
10/15/2018	SAM	Reviewed correspondence from C. Brunsting re the farm appraisals.	0.20 395.00/hr	Trust L120	\$79.00
10/16/2018	SAM	Reviewed the file re pending administration issues.	0.20 395.00/hr	Trust L120	NO CHARGE
10/19/2018	SAM	Reviewed correspondence from and prepared correspondence to R. Munson re appraisal issues; reviewed the court's file re pending pleadings.	0.30 395.00/hr	Canda L120	\$118.50
10/22/2018	TJJ	Reviewed C. Curtis' plea to the jurisdiction and motion to dismiss; prepared A. Brunsting's response to same.	0.70 195.00/hr	Canda L240	\$136.50

			<u>Hrs/Rate</u>		<u>Amount</u>
10/31/2018	TJJ	Prepared notice of intent to take deposition of C. Kunz-Freed; prepared correspondence to A. Johnson re same.	0.70 195.00/hr	Canda L330	\$136.50
	TJJ	Prepared A. Brunsting's motion to disburse trust funds; reviewed authorities re	1.60 195.00/hr	Canda L250	\$312.00
	SAM	Conferred with prepared correspondence to	0.50 395.00/hr	Canda L160	\$197.50
	TJJ	Prepared A. Brunsting's notice of deposition of C. Kunz-Freed; reviewed and filed same.	0.40 195.00/hr	Canda L330	\$78.00
	TJJ	Conferred with	0.30 195.00/hr	Trust L250	NO CHARGE
	SAM	Reviewed correspondence from and prepared correspondence to N. Spielman and B. Bayless re settlement.	0.30 395.00/hr	Carl L160	\$118.50
	SAM	Conferred with ; reviewed correspondence from and prepared correspondence to B. Bayless re the depositions; reviewed correspondence from and prepared correspondence to	0.70 395.00/hr	Canda L330	\$276.50
11/28/2018	TJJ	Reviewed authorities re prepared C. Kunz-Freed subpoena to appear for oral deposition; conferred with prepared correspondence to C. Reed re service of same.	1.30 195.00/hr	Canda L330	\$253.50
	SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Canda L330	NO CHARGE
	MT	Updated litigation index re notice of intent to deposition C. Freed.	0.10 129.50/hr	Canda L330	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
11/29/2018	TJJ	Prepared motion to compel deposition of C. Kunz-Freed.	0.80 195.00/hr	Canda L350	\$156.00
	TJJ	Reviewed subpoena to C. Kunz-Freed to appear for oral deposition; prepared correspondence to J. Hershey re service of same.	0.40 195.00/hr	Canda L330	\$78.00
11/30/2018	EJW	Revised motion to disburse trust funds.	0.30 250.00/hr	Canda L250	\$75.00
	TJJ	Prepared A. Brunsting's motion to disburse trust funds and order granting same.	1.80 195.00/hr	Canda L250	\$351.00
	SAM	Reviewed C. Kunz-Freed's motion to quash and for protection.	0.30 395.00/hr	Canda L250	\$118.50
12/3/2018	TJJ	Reviewed C. Kunz-Freed's motion to quash and motion for protection; prepared A. Brunsting's response and motion to compel deposition; reviewed authorities re	3.30 195.00/hr	Canda L350	\$643.50
12/4/2018	EJW	Reviewed and revised motion to compel deposition and response to motion for protection.	0.60 250.00/hr	Canda L350	\$150.00
	TJJ	Prepared A. Brunsting's motion to compel and response to C. Kunz-Freed's motion to quash and for protection; reviewed authorities re attorney client privilege and capacity.	2.70 195.00/hr	Canda L350	\$526.50
12/8/2018	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Litiga L120	\$118.50
	SAM	Prepared correspondence to B. Bayless re the deposition and mediation of the case.	0.30 395.00/hr	Litiga L330	\$118.50
12/10/2018	SAM	Prepared correspondence to prepared correspondence to	0.40 395.00/hr	Canda L120	\$158.00

			<u>Hrs/Rate</u>		<u>Amount</u>
12/10/2018	TJJ	Prepared A. Brunsting's motion to compel and response to C. Kunz-Freed's motions to quash and for protection.	1.00 195.00/hr	Canda L350	\$195.00
	SAM	Conferred with	0.20 395.00/hr	Litiga L120	NO CHARGE
	SAM	Reviewed correspondence from and prepared correspondence to Carole Brunsting re mediation and related issues.	0.40 395.00/hr	Litiga L160	\$158.00
12/14/2018	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L120	\$118.50
12/15/2018	SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Canda L120	\$79.00
12/17/2018	TJJ	Prepared A. Brunsting's motion to compel and response to C. Kunz-Freed's motions to quash and for protection.	2.80 195.00/hr	Canda L350	\$546.00
	MT	Conferred with court clerk re motion to quash.	0.20 129.50/hr	Canda L350	\$25.90
12/18/2018	TJJ	Prepared A. Brunsting's motion to compel deposition of C. Kunz-Freed; prepared proposed order granting same; reviewed and filed same; prepared A. Brunsting's response to C. Kunz-Freed's motions to quash and for protection.	2.60 195.00/hr	Canda L350	\$507.00
	MT	Prepared correspondence to and reviewed correspondence from Judge Comstock re hearing for motion to compel; reviewed and prepared docket matters re hearing for motion to compel.	0.40 129.50/hr	Canda L250	\$51.80
12/19/2018	MT	Updated litigation index re affidavit of service on C. Kunz-Freed.	0.10 129.50/hr	Canda L140	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>	
12/28/2018	MT	Prepared and filed notice of hearing re motion to quash, motion for protection, and motion to compel; updated litigation index re same.	0.40 129.50/hr	Canda L350	\$51.80
	TJJ	Conferred with	0.20 195.00/hr	Canda L350	NO CHARGE
	SAM	Conferred with	0.20 395.00/hr	Canda L330	\$79.00
	SAM	Prepared correspondence to reviewed the file re same.	0.20 395.00/hr	Trust L120	\$79.00
1/3/2019	SAM	Reviewed correspondence from Carole Brunsting re settlement; reviewed correspondence from	0.20 395.00/hr	Litiga L160	\$79.00
1/4/2019	TJJ	Prepared A. Brunsting's response to C. Kunz-Freed's motions to quash and for protection; prepared A. Brunsting's motion to disburse trust funds.	1.00 195.00/hr	Canda L250	\$195.00
1/10/2019	MT	Reviewed status of docket.	0.20 129.50/hr	Canda L190	NO CHARGE
1/11/2019	TJJ	Reviewed and revised A. Brunsting's response to C. Kunz-Freed's motions to quash and for protection.	0.60 195.00/hr	Canda L350	\$117.00
1/15/2019	TJJ	Prepared A. Brunsting's response to C. Kunz-Freed's motion to quash and for protection; reviewed authorities re	1.30 195.00/hr	Canda L350	\$253.50
	SAM	Reviewed and revised the motion to compel against C. Kunz-Freed; conferred with	0.60 395.00/hr	Canda L350	\$237.00

			<u>Hrs/Rate</u>		<u>Amount</u>
1/15/2019	TJJ	Prepared A. Brunsting's response to C. Kunz-Freed's motion to quash and for protection; reviewed authorities re	1.30 195.00/hr	Canda L350	\$253.50
	TJJ	Conferred with	0.20 195.00/hr	Canda L350	NO CHARGE
1/16/2019	SAM	Revised the reply to the response to A. Brunsting's motion to compel the deposition of Kunz-Freed.	1.00 395.00/hr	Canda L350	\$395.00
	TJJ	Prepared A. Brunsting's response to C. Kunz-Freed's motions to quash and for protection; conferred with reviewed and filed same.	1.10 195.00/hr	Canda L350	\$214.50
1/17/2019	MT	Updated litigation index re response to motion to quash.	0.10 129.50/hr	Canda L140	NO CHARGE
1/22/2019	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L350	\$118.50
1/23/2019	MT	Updated litigation index re A. Brunsting's reply to C. Kunz-Freed's response to motion to compel.	0.10 129.50/hr	Canda L140	NO CHARGE
1/24/2019	TJJ	Prepared for, traveled to, attended, and returned from court re oral hearing on A. Brunsting's motion to compel and C. Kunz-Freed's motions to quash and for protection.	4.40 195.00/hr	Canda L230	\$858.00
	TJJ	Prepared A. Brunsting's motion to disburse trust funds re farm appraisal; prepared order granting same.	0.40 195.00/hr	Canda L250	\$78.00
	TJJ	Reviewed court's order granting A. Brunsting's motion to compel the deposition of C. Kunz-Freed; prepared correspondence re same; prepared correspondence to Z. Foley re dates for deposition.	0.40 195.00/hr	Canda L330	\$78.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
1/25/2019	TJJ	Reviewed C. Curtis' motion to make more definite and certain the parties and claims; reviewed Amy Brunsting's draft motion for clarification and/or motion to dismiss; conferred with	1.30 195.00/hr	Canda L250	\$253.50
	SAM	Conferred with reviewed Amy Brunsting's draft motion for clarification and/or motion to dismiss.	0.30 395.00/hr	Canda L250	\$118.50
1/28/2019	SAM	Reviewed and revised Amy Brunsting's motion for clarification and dismissal; conferred with conferred with	1.30 395.00/hr	Canda L250	\$513.50
	TJJ	Conferred with	0.50 195.00/hr	Canda L250	NO CHARGE
	TJJ	Conferred with	0.70 195.00/hr	Canda L350	\$136.50
	MT	Updated litigation index re C. Kunz-Freed and Vacek's motion to dismiss with want of prosecution; reviewed court's docket for hearing re same; prepared notice of appearance; conferred with	0.90 129.50/hr	Canda L140	\$116.55
	TJJ	Reviewed and revised Amy Brunsting's motion for clarification and/or motion to dismiss; prepared Anita Brunsting's motion to obtain approval re appraisal; prepared order re same; reviewed and filed same.	3.40 195.00/hr	Canda L250	NO CHARGE
1/29/2019	SAM	Reviewed and revised Anita Brunsting's motion for clarification and dismissal; conferred with reviewed correspondence from	0.50 395.00/hr	Canda L250	\$197.50

			<u>Hrs/Rate</u>		<u>Amount</u>
		and prepared correspondence to			
1/29/2019	TJJ	Reviewed correspondence from C. Reed re C. Kunz-Freed deposition dates; conferred with	0.30 195.00/hr	Canda L330	NO CHARGE
	TJJ	Prepared Anita Brunsting's motion to join Amy Brunsting's motion for clarification and/or motion to dismiss; conferred with reviewed and filed same.	0.60 195.00/hr	Canda L250	\$117.00
	MT	Updated litigation index re motion to clarify, notice of hearing for same, motion for approval of appraisers, and motion to join; reviewed and prepared docket matters re same.	0.40 129.50/hr	Canda L140	\$51.80
1/30/2019	TJJ	Prepared correspondence to C. Curtis, Carole Brunsting, Carl Brunsting, and Amy Brunsting re trust accounting update; reviewed and organized client documents re same	3.50 195.00/hr	Trust L320	\$682.50
	TJJ	Conferred with	0.30 195.00/hr	Trust L150	NO CHARGE
2/1/2019	SAM	Conferred with prepared correspondence to	0.70 395.00/hr	Canda L330	\$276.50
2/4/2019	TJJ	Prepared subpoena for documents and tangible things to C. Kunz-Freed; prepared A. Brunsting's 1st requests for production to C. Curtis.	1.10 195.00/hr	Canda L310	\$214.50
	MT	Updated litigation index re C. Kunz-Freed's response to motion to clarify and C. Brunsting's response to motion to clarify; prepared correspondence to Judge Comstock re court's availability for C. Kunz-Freed's deposition.	0.50 129.50/hr	Canda L330	\$64.75

		<u>Hrs/Rate</u>		<u>Amount</u>	
2/5/2019	SAM	Conferred several times with conferred with	1.00 395.00/hr	Canda L390	\$395.00
	TJJ	Reviewed correspondence from C. Comstock re C. Kunz-Freed deposition.	0.30 195.00/hr	Canda L330	\$58.50
	TJJ	Reviewed and revised draft of Amy Brunsting's reply to C. Curtis' response to Amy Brunsting's motion for clarification and to dismiss; reviewed C. Curtis' response to Amy Brunsting's motion for clarification and to dismiss; reviewed authorities re estate claims as property; conferred with S.	1.80 195.00/hr	Canda L250	\$351.00
	TJJ	Prepared subpoena for documents and tangible things to C. Kunz-Freed; conferred with prepared correspondence to C. Reed re same.	0.90 195.00/hr	Canda L310	\$175.50
	MT	Updated litigation index re A. Brunsting's response to C. Curtis' motions.	0.10 129.50/hr	Canda L140	NO CHARGE
	TJJ	Conferred with	0.50 195.00/hr	Litiga L250	NO CHARGE
	SAM	Conferred with	0.30 395.00/hr	Canda L250	\$118.50
2/6/2019	TJJ	Reviewed court's docket re hearing on Amy Brunsting's motion for clarification and to dismiss.	0.40 195.00/hr	Canda L250	\$78.00
2/7/2019	MT	Prepared correspondence to and reviewed correspondence from court re confirmation of deposition date and hearing for motion to obtain an appraisal; reviewed and prepared docket matters re	0.70 129.50/hr	Canda L330	\$90.65

		<u>Hrs/Rate</u>		<u>Amount</u>
	deposition date; reviewed court's response re hearing for motion to obtain an appraisal.			
2/7/2019	SAM Reviewed the file re hearing dates and strategy issues.	0.30 395.00/hr	Canda L120	\$118.50
	TJJ Reviewed C. Curtis response to Amy Brunsting's interrogatories and requests for production.	0.90 195.00/hr	Canda L310	\$175.50
	TJJ Prepared for, traveled to, attended, and returned from court re oral hearing on Amy Brunsting's motion to clarify and to dismiss.	3.50 195.00/hr	Canda L230	\$682.50
2/8/2019	MT Prepared correspondence to court re hearing for motion to obtain an appraisal; reviewed and prepared docket matters re same; prepared and filed notice of hearing; updated litigation index re same.	0.40 129.50/hr	Canda L190	\$51.80
	TJJ Reviewed correspondence from C. Comstock re hearing date for Anita Brunsting's motion for appraisal and notice of C. Kunz-Freed deposition.	0.20 195.00/hr	Canda L250	\$39.00
2/11/2019	SAM Reviewed correspondence from and prepared correspondence to Judge Comstock re the hearings for an appraisal, an attorney fee application, and C. Curtis' pleas for abatement and to the court's jurisdiction.	0.50 395.00/hr	Canda L120	\$197.50
	TJJ Reviewed correspondence from and prepared correspondence to Judge Comstock re hearing date for motion to approve appraisal; reviewed authorities re pleading deadlines; conferred with	1.20 195.00/hr	Canda L250	\$234.00
	SAM Conferred with	0.00 395.00/hr	Canda L250	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>
2/13/2019	TJJ	0.80 195.00/hr	Canda L330	\$156.00
2/14/2019	MT	0.40 129.50/hr	Canda L330	\$51.80
	MT	0.10 129.50/hr	Canda L350	\$12.95
2/20/2019	TJJ	1.30 195.00/hr	Canda L330	\$253.50
	TJJ	1.30 195.00/hr	Canda L310	\$253.50
	TJJ	1.50 195.00/hr	Canda L350	\$292.50
	SAM	1.00 395.00/hr	Canda L120	\$395.00
2/22/2019	MT	0.40 129.50/hr	Canda L140	\$51.80
2/25/2019	SAM	0.30 395.00/hr	Trust L120	\$118.50

			<u>Hrs/Rate</u>		<u>Amount</u>
2/25/2019	TJJ	Reviewed C. Curtis notice of intent and attorney-client privilege briefing re C. Kunz-Feed deposition; prepared Anita Brunsting's brief to court re attorney-client privilege; reviewed authorities re exceptions to same.	3.00 195.00/hr	Canda L330	\$585.00
	TJJ	Reviewed C. Curtis' objection to motion to approve appraisal.	0.30 195.00/hr	Canda L250	\$58.50
	TJJ	Met with	1.50 195.00/hr	Canda L120	\$292.50
	TJJ	Conferred with	0.20 195.00/hr	Canda L250	NO CHARGE
2/26/2019	TJJ	Reviewed correspondence from C. Reed re privilege waiver; reviewed proposed agreement re same; reviewed correspondence from and prepared correspondence to prepared briefing to court re attorney client privilege; reviewed authorities re same; reviewed draft briefing from conferred with	4.10 195.00/hr	Canda L250	\$799.50
2/27/2019	TJJ	Prepared briefing re attorney client privilege.	1.20 195.00/hr	Canda L250	\$234.00
	TJJ	Prepared Anita Brunsting's requests for production to C. Curtis; reviewed exhibits to C. Curtis motion for summary judgment response and federal court petition re same.	0.80 195.00/hr	Canda L350	\$156.00
	TJJ	Reviewed authorities re	0.80 195.00/hr	Canda L210	\$156.00
	TJJ	Prepared Anita Brunsting's motion to approve attorney's fees and expenses.	0.60 195.00/hr	Canda L250	\$117.00

		<u>Hrs/Rate</u>		<u>Amount</u>
2/28/2019	TJJ	2.70 195.00/hr	Canda L250	\$526.50
	TJJ	0.10 195.00/hr	Canda L350	NO CHARGE
3/1/2019	TJJ	1.50 195.00/hr	Canda L330	\$292.50
	TJJ	0.50 195.00/hr	Canda L250	\$97.50
	MT	0.20 129.50/hr	Canda L140	NO CHARGE
3/4/2019	TJJ	0.40 195.00/hr	Canda L250	\$78.00
3/5/2019	TJJ	0.50 195.00/hr	Trust L320	\$97.50
	TJJ	0.50 195.00/hr	Canda L240	\$97.50
	TJJ	0.50 195.00/hr	Canda L390	\$97.50
	MT	0.20 129.50/hr	Canda L140	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>
3/6/2019	SAM	0.20 395.00/hr	Litiga L120	NO CHARGE
	TJJ	1.70 195.00/hr	Trust L250	\$331.50
<p>Conferred with</p> <p>Prepared for hearing re motion to approve appraisal; conferred with prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting re same; reviewed correspondence from and prepared correspondence to N. Konz re same.</p>				
3/7/2019	SAM	0.20 395.00/hr	Trust L120	\$79.00
	TJJ	2.20 195.00/hr	Canda L230	\$429.00
	TJJ	0.20 195.00/hr	Canda L320	\$39.00
	TJJ	0.20 195.00/hr	Litiga L250	NO CHARGE
3/8/2019	TJJ	0.20 195.00/hr	Trust L390	\$39.00
3/11/2019	SAM	0.30 395.00/hr	Canda L120	\$118.50
	TJJ	0.60 195.00/hr	Trust L390	\$117.00
	TJJ	1.80 195.00/hr	Canda L320	\$351.00
<p>Conferred several times with</p> <p>Reviewed 2017 trust tax returns re professional fees; conferred with prepared correspondence to B. Bayless re same.</p> <p>Reviewed privileged documents from C. Kunz-Freed re waiving privilege; reviewed and responded to correspondence from</p>				

		<u>Hrs/Rate</u>		<u>Amount</u>	
3/11/2019	TJJ	Conferred with	0.20 195.00/hr	Trust L390	NO CHARGE
3/12/2019	SAM	Conferred with	0.20 395.00/hr	Canda L120	\$79.00
	TJJ	Reviewed and responded to correspondence from	0.30 195.00/hr	Canda L320	\$58.50
3/19/2019	EJW	Conferred with several court reporter agencies re March 20 deposition; prepared exhibit binders for same.	4.00 250.00/hr	Canda L330	\$1,000.00
	TJJ	Conferred with reviewed C. Kunz-Freed's production re same; prepared deposition exhibits re same; reviewed C. Curtis' pleadings re same.	4.00 195.00/hr	Canda L330	\$780.00
	SAM	Prepared for the deposition of Candace Kunz-Freed; conferred twice with ; conferred several times with	6.40 395.00/hr	Canda L330	\$2,528.00
	JM	Prepared and organized deposition exhibits; conferred with conferred with multiple court reporting agencies re deposition availability; conferred with M. Mauger re same.	4.50 129.50/hr	Canda L330	\$582.75
	MW	Prepared and organized deposition exhibits.	2.00 129.50/hr	Canda L330	\$259.00
	MT	Conferred with multiple court reporting agencies re deposition; prepared multiple correspondences to multiple court reporting agencies re same; prepared and organized deposition exhibits; conferred with	4.50 129.50/hr	Canda L330	\$582.75

			<u>Hrs/Rate</u>		<u>Amount</u>
3/19/2019	TJJ	Conferred with M. Mauger, J. Munro, and E. Wyatt re outline and exhibits for C. Kunz-Freed deposition.	0.50 195.00/hr	Canda L330	NO CHARGE
	TJJ	Conferred with reviewed C. Kunz-Freed's production re same; prepared deposition exhibits re same; reviewed Carl Brunsting's pleadings re same.	4.00 195.00/hr	Canda L330	\$780.00
3/20/2019	TJJ	Prepared for, traveled to, and attended the deposition of C. Kunz-Freed; conferred with	9.00 195.00/hr	Canda L330	\$1,755.00
	SAM	Prepared for, traveled to, attended, and returned from the deposition of Candace Kunz-Freed.	12.00 395.00/hr	Canda L330	\$4,740.00
3/21/2019	SAM	Reviewed the file post-deposition of Candace Kunz-Freed and evaluated the litigation strategy moving forward.	3.80 395.00/hr	Canda L120	\$1,501.00
3/22/2019	TJJ	Reviewed and organized Anita Brunsting's accounting documents and correspondence re same.	0.60 195.00/hr	Trust L140	\$117.00
3/23/2019	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L120	\$118.50
3/26/2019	TJJ	Received and organized accounting documents and correspondence.	0.70 195.00/hr	Trust L140	\$136.50
	TJJ	Conferred with	0.40 195.00/hr	Canda L210	\$78.00
	MT	Prepared correspondence to updated litigation index re same.	0.20 129.50/hr	Canda L140	\$25.90
3/28/2019	TJJ	Reviewed and organized	3.40 195.00/hr	Trust L140	\$663.00

		<u>Hrs/Rate</u>		<u>Amount</u>
4/1/2019	TJJ	Reviewed and organized	2.70 195.00/hr	Trust L140 \$526.50
4/11/2019	SAM	Reviewed correspondence from and prepared correspondence to Carole Brunsting re the resumption of C. Kunz-Freed deposition; reviewed correspondence from	0.30 395.00/hr	Canda L310 \$118.50
4/26/2019	TJJ	Reviewed Anita Brunsting's prior accounting correspondence re frequency.	0.40 195.00/hr	Trust L320 \$78.00
5/2/2019	MT	Updated discovery index re C. Kunz-Freed deposition transcript with exhibits.	0.40 129.50/hr	Canda L190 \$51.80
5/8/2019	SAM	Reviewed purported notice from R. Munson re a hearing on a closed federal court case; conferred with reviewed the court's electronic records re same.	0.50 395.00/hr	Canda L120 \$197.50
5/13/2019	TJJ	Reviewed Amy Brunsting's motion for sanctions; reviewed authorities re Court's inherent sanction powers; prepared correspondence to	1.00 195.00/hr	Canda L250 \$195.00
5/14/2019	SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Canda L330 \$79.00
5/15/2019	TJJ	Reviewed correspondence from C. Reed re date to continue C. Kunz-Freed deposition; reviewed and revised correspondence to Judge Comstock re same.	0.20 195.00/hr	Canda L330 \$39.00
	MT	Updated litigation index re Amy Brunsting's motion for sanctions and contempt.	0.10 129.50/hr	Litiga L140 NO CHARGE
5/17/2019	TJJ	Reviewed correspondence from prepared notice re same; reviewed and filed same.	0.50 195.00/hr	Canda L330 \$97.50

			<u>Hrs/Rate</u>		<u>Amount</u>
5/17/2019	TJJ	Prepared Anita Brunsting's motion for reimbursement of attorney's fees; reviewed fee invoices re same; prepared proposed order re same.	2.30 195.00/hr	Canda L250	\$448.50
	MT	Updated litigation index re notice of intent to continue deposition of C. Kunz-Freed; conferred with Carole Davis re court reporter for same; prepared correspondence to and from Carole Davis re same; prepared correspondence to and from Southwest Court Reporting re same; reviewed and prepared docket matters re deposition.	0.60 129.50/hr	Canda L140	\$77.70
5/20/2019	TJJ	Reviewed correspondence from prepared same.	0.30 195.00/hr	Litiga L310	\$58.50
	TJJ	Reviewed correspondence from prepared same.	0.30 195.00/hr	Canda L310	\$58.50
5/21/2019	MT	Updated litigation index re notice of hearing for Amy's motion for sanctions and contempt; reviewed and prepared docket matters re same.	0.20 129.50/hr	Litiga L140	NO CHARGE
	TJJ	Prepared Anita Brunsting's first requests for production to C. Curtis; reviewed order dismissing C. Curtis' claims re same.	0.30 195.00/hr	Canda L310	\$58.50
	TJJ	Prepared Anita Brunsting's first requests for production to Carole Brunsting.	0.30 195.00/hr	Litiga L310	\$58.50
5/22/2019	TJJ	Reviewed correspondence from reviewed and revised original counterclaims re same; reviewed trust documents re same; reviewed and revised correspondence to	1.00 195.00/hr	Canda L210	\$195.00
6/6/2019	TJJ	Reviewed prior correspondence re accounting updates re frequency.	0.50 195.00/hr	Trust L320	\$97.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
6/6/2019	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to	0.60 395.00/hr	Trust L120	\$237.00
6/7/2019	TJJ	Reviewed correspondence from reviewed prior correspondence re same.	0.50 195.00/hr	Trust L150	\$97.50
	SAM	Conferred several times with reviewed the files re same; prepared correspondence to C. Brunsting re same; prepared correspondence to	1.20 395.00/hr	Trust L150	\$474.00
	TJJ	Conferred with	0.30 195.00/hr	Trust L150	NO CHARGE
6/8/2019	SAM	Reviewed correspondence from B. Bayless re accounting records; reviewed the file re same; prepared correspondence to all parties re same.	0.40 395.00/hr	Trust L120	\$158.00
6/12/2019	MT	Updated litigation index re C. Curtis' response to application for contempt and petition for declaratory judgment.	0.20 129.50/hr	Canda L140	NO CHARGE
	TJJ	Reviewed C. Curtis' response to Amy Brunsting's motion for sanctions; reviewed authorities re legal title and pour-over Will issues.	1.60 195.00/hr	Canda L250	\$312.00
6/14/2019	SAM	Reviewed multiple correspondence among the parties and the court re deposition scheduling issues.	0.30 395.00/hr	Canda L330	\$118.50
6/24/2019	MT	Reviewed correspondence from and prepared correspondence to court reporter re deposition of C. Kunz-Freed.	0.30 129.50/hr	Canda L330	\$38.85

		<u>Hrs/Rate</u>		<u>Amount</u>
6/25/2019	TJJ	7.50 195.00/hr	Canda L330	\$1,462.50
6/26/2019	TJJ	4.80 195.00/hr	Canda L330	\$936.00
	SAM	1.00 395.00/hr	Canda L330	\$395.00
	TJJ	0.40 195.00/hr	Canda L330	NO CHARGE
6/27/2019	SAM	9.00 395.00/hr	Canda L330	\$3,555.00
	SAM	0.40 395.00/hr	Trust L120	\$158.00
	EJW	0.30 250.00/hr	Canda L120	NO CHARGE
	TJJ	7.70 195.00/hr	Canda L330	\$1,501.50
6/28/2019	SAM	0.50 395.00/hr	Canda L120	\$197.50

			<u>Hrs/Rate</u>		<u>Amount</u>
6/28/2019	TJJ	Prepared Anita and Amy Brunsting's joint application for reimbursement of attorneys' fees; prepared affidavit of _____ conferred with _____	2.80 195.00/hr	Canda L250	\$546.00
	TJJ	Prepared for, traveled to, attended, and returned from court re oral hearing on Amy Brunsting's motion for sanctions against C. Curtis.	2.60 195.00/hr	Canda L230	\$507.00
7/1/2019	TJJ	Conferred with _____	0.30 195.00/hr	Trust L120	NO CHARGE
	SAM	Conferred with _____ reviewed the accounting correspondence to the family members.	0.40 395.00/hr	Trust L120	\$158.00
	SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re tolling agreement; reviewed correspondence from _____	1.40 395.00/hr	Carl L250	\$553.00
	TJJ	Reviewed and organized accounting documents; prepared correspondence to Amy Brunsting, Carl Brunsting, Carole Brunsting; and C. Curtis re accounting update.	3.30 195.00/hr	Trust L320	\$643.50
	TJJ	Prepared S. Mendel's and S. Griffin's affidavits re Amy and Anita Brunsting's joint application for reimbursement of attorneys' fees; prepared order granting same.	0.40 195.00/hr	Canda L250	\$78.00
7/2/2019	TJJ	Prepared correspondence to R. Vander Werff re farm appraisal; reviewed prior correspondence re same.	1.30 195.00/hr	Trust L190	\$253.50
7/3/2019	MT	Updated litigation index re proposed order for Amy's motion for sanctions.	0.10 129.50/hr	Canda L140	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
7/4/2019	SAM	Prepared correspondence to	0.30 395.00/hr	Canda L330	\$118.50
7/8/2019	SAM	Conferred with conferred with	0.60 395.00/hr	Canda L330	\$237.00
	MT	Updated litigation index re C. Curtis' proposed order re post hearing findings of fact and memorandum re appointing an administrator.	0.20 129.50/hr	Canda L190	NO CHARGE
	SAM	Conferred with	0.40 395.00/hr	Canda L240	\$158.00
	TJJ	Reviewed C. Curtis' proposed order and findings and conclusions of law re Amy Brunsting's motion for sanctions; reviewed C. Curtis' memo re appointment of administrator.	0.80 195.00/hr	Canda L250	\$156.00
	TJJ	Conferred with	0.40 195.00/hr	Trust L250	NO CHARGE
7/11/2019	SAM	Reviewed and approved the tolling agreement for Carl Brunsting.	0.20 395.00/hr	Carl L250	\$79.00
	MT	Updated file memo re tolling agreement; prepared correspondence to B. Bayless re same.	0.20 129.50/hr	Carl L250	\$25.90
7/12/2019	SAM	Reviewed the file re pending administration issues.	0.20 395.00/hr	Trust L120	NO CHARGE
7/13/2019	SAM	Reviewed correspondence from B. Bayless re Carl Brunsting's tolling agreement; reviewed the file re the appraisal issue; prepared correspondence to	0.40 395.00/hr	Carl L250	\$158.00

		<u>Hrs/Rate</u>		<u>Amount</u>
7/15/2019 MT	Reviewed correspondence from B. Bayless re tolling agreement; reviewed correspondence from	0.10 129.50/hr	Carl L250	NO CHARGE
7/19/2019 MT	Reviewed correspondence from court reporter re reporter's record from hearing.	0.10 129.50/hr	Litiga L190	NO CHARGE
	SAM Reviewed correspondence from the court reporter re transcript for the sanctions hearing.	0.20 395.00/hr	Canda L230	\$79.00
7/23/2019 MT	Updated litigation index re order for sanctions re C. Curtis; reviewed correspondence from the court re same.	0.20 129.50/hr	Canda L140	\$25.90
7/30/2019 MT	Updated discovery index re C. Kunz-Freed's deposition transcript and deposition exhibits; reviewed correspondence from court reporter re same.	0.40 129.50/hr	Canda L110	\$51.80
8/1/2019 MT	Updated file memo re correspondence from Southwest Reporting re C. Kunz-Freed's deposition.	0.10 129.50/hr	Canda L330	NO CHARGE
8/12/2019 MT	Updated litigation index re order granting appraisal; prepared correspondence to	0.20 129.50/hr	Trust L140	\$25.90
	SAM Reviewed correspondence from and prepared correspondence to reviewed multiple correspondence from and prepared multiple correspondence to B. Bayless and N. Spielman re settlement issues.	0.50 395.00/hr	Carl L160	\$197.50
8/13/2019 MT	Reviewed multiple correspondences to and from opposing counsel re mediation; prepared correspondence to	0.30 129.50/hr	Canda L160	\$38.85

		<u>Hrs/Rate</u>		<u>Amount</u>	
8/14/2019	MT	Reviewed multiple correspondences from opposing counsel re mediation.	0.10 129.50/hr	Canda L160	NO CHARGE
	SAM	Reviewed credentials of Judge Charles Seymore to be mediator; reviewed multiple correspondence from and prepared multiple correspondence to B. Bayless and N. Spielman re mediation issues.	0.70 395.00/hr	Canda L160	\$276.50
8/15/2019	MT	Reviewed multiple correspondences re mediation.	0.10 129.50/hr	Canda L160	\$12.95
	TJJ	Reviewed correspondence from Carole Brunsting, B. Bayless, and N. Spielman re potential mediator; reviewed potential mediator's curriculum vitae.	0.30 195.00/hr	Canda L160	\$58.50
	SAM	Conferred with	0.40 395.00/hr	Canda L160	\$158.00
	TJJ	Conferred with	0.40 195.00/hr	Litiga L160	NO CHARGE
8/16/2019	SAM	Reviewed the file re pending administration issues.	0.30 395.00/hr	Trust L120	\$118.50
8/20/2019	SAM	Conferred with	0.30 395.00/hr	Canda L160	\$118.50
	TJJ	Conferred with ; prepared correspondence to Judge Seymore re conference call to discuss case.	0.40 195.00/hr	Canda L160	\$78.00
	TJJ	Conferred with	0.30 195.00/hr	Litiga L160	NO CHARGE
8/26/2019	TJJ	Conferred with conferred with	0.40 195.00/hr	Canda L160	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
8/26/2019	SAM	Reviewed the file re appraisal issues; conferred with	0.30 395.00/hr	Canda L120	\$118.50
	TJJ	Reviewed correspondence from and prepared correspondence to	0.20 195.00/hr	Canda L160	\$39.00
9/3/2019	MT	Reviewed file re outstanding issues; conferred with	0.20 129.50/hr	Trust L190	NO CHARGE
	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Trust L120	\$118.50
9/5/2019	MT	Reviewed correspondence from outstanding issues.	0.10 129.50/hr	Canda L160	NO CHARGE
		reviewed file re			
9/13/2019	MT	Conferred with	0.10 129.50/hr	Canda L190	NO CHARGE
9/17/2019	SAM	Conferred with Charles Seymore re mediation of the case; prepared correspondence to	0.40 395.00/hr	Canda L160	\$158.00
10/9/2019	SAM	Conferred with Judge Seymore re mediation issues; prepared multiple correspondence to Judge Seymore re trust issues.	1.20 395.00/hr	Canda L160	\$474.00
10/10/2019	SAM	Reviewed correspondence from and prepared correspondence to	0.40 395.00/hr	Canda L120	\$158.00
	SAM	Reviewed correspondence from and prepared correspondence to C. Seymore re settlement issues; prepared correspondence to	0.50 395.00/hr	Canda L160	\$197.50
10/12/2019	SAM	Prepared file memo re	0.30 395.00/hr	Canda L330	\$118.50

			<u>Hrs/Rate</u>		<u>Amount</u>
10/16/2019	EJW	Reviewed C. Kunz-Freed's motion for appointment of successor representative of the estate.	0.30 250.00/hr	Canda L120	\$75.00
	SAM	Prepared file memo re pending issues; conferred with	0.50 395.00/hr	Canda L120	\$197.50
10/17/2019	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L160	\$118.50
	ROC	Reviewed the file re case status and outstanding issues; prepared file memo re mediation and strategy issues.	2.50 175.00/hr	Canda L160	\$437.50
10/18/2019	EJW	Reviewed and prepared docket matters; reviewed motion to appoint personal representative.	0.30 250.00/hr	Canda L190	\$75.00
	ROC	Reviewed authorities re reviewed and revised counterclaim.	2.20 175.00/hr	Canda L120	\$385.00
10/21/2019	SAM	Reviewed the file re counterclaims to be asserted.	0.30 395.00/hr	Canda L120	\$118.50
10/22/2019	MT	Updated litigation index re reporter's certificate re C. Kunz-Freed's deposition.	0.10 129.50/hr	Canda L140	NO CHARGE
	SAM	Reviewed and revised the joint petition for declaratory judgment; prepared correspondence to	1.00 395.00/hr	Canda L210	\$395.00
10/23/2019	SAM	Conferred with prepared file memo re same; prepared correspondence to	1.60 395.00/hr	Canda L210	\$632.00
	ROC	Prepared amended answer re affirmative defenses; reviewed the federal and state litigation reports re production for source of financial and stock transfers from survivor trust or decedent trust.	3.40 175.00/hr	Canda L250	\$595.00

			<u>Hrs/Rate</u>		<u>Amount</u>
10/24/2019	SAM	Conferred with _____ reviewed and revised the second amended answer; reviewed the counterclaims re same.	2.30 395.00/hr	Canda L210	\$908.50
	ROC	Reviewed the federal and state litigation reports re	0.70 175.00/hr	Canda L320	\$122.50
10/25/2019	SAM	Prepared for and attended the status conference call with _____; reviewed correspondence from _____ and prepared correspondence to _____	3.00 395.00/hr	Canda L120	\$1,185.00
10/26/2019	SAM	Prepared correspondence to _____	0.20 395.00/hr	Canda L120	\$79.00
10/28/2019	SAM	Reviewed correspondence from C. Seymore re mediation issues; reviewed the C. Curtis distribution chart; prepared correspondence to C. Seymore re same; prepared correspondence to _____ reviewed the Iowa farm appraisal; prepared correspondence to _____	0.80 395.00/hr	Canda L160	\$316.00
11/2/2019	SAM	Reviewed correspondence from _____ prepared correspondence to C. Seymore re same.	0.50 395.00/hr	Canda L160	\$197.50
11/4/2019	MT	Updated litigation index re Amy and Anita Brunsting's response to motion to appoint personal representative with proposed order; filed second amended answer.	0.40 129.50/hr	Canda L140	\$51.80
	SAM	Reviewed and revised the settlement proposal for the mediator; prepared correspondence to _____ conferred with _____ reviewed correspondence from _____ and prepared correspondence to C. Seymore re mediation issues.	3.30 395.00/hr	Canda L160	\$1,303.50

		<u>Hrs/Rate</u>		<u>Amount</u>
11/4/2019	SAM	1.00 395.00/hr	Canda L210	\$395.00
	SAM	1.00 395.00/hr	Canda L250	\$395.00
11/5/2019	MT	0.40 129.50/hr	Canda L140	\$51.80
	SAM	1.80 395.00/hr	Canda L160	\$711.00
11/6/2019	SAM	2.00 395.00/hr	Canda L230	\$790.00
11/7/2019	SAM	0.80 395.00/hr	Canda L160	\$316.00
	MT	0.20 129.50/hr	Canda L140	NO CHARGE
	EJW	0.30 250.00/hr	Trust L190	\$75.00
	EJW	0.30 250.00/hr	Canda L320	\$75.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
11/7/2019	SAM	Prepared multiple correspondence to and reviewed multiple correspondence from N. Spielman and B. Bayless re the deposition of C. Curtis.	0.50 395.00/hr	Canda L330	\$197.50
11/8/2019	MT	Prepared documents for production.	1.00 129.50/hr	Canda L320	\$129.50
	EJW	Reviewed and redacted invoices.	0.40 250.00/hr	Trust L190	\$100.00
	EJW	Prepared documents for production.	0.40 250.00/hr	Canda L320	\$100.00
11/11/2019	SAM	Reviewed correspondence from C. Seymore re mediation meeting; conferred with reviewed the file re same.	0.30 395.00/hr	Canda L160	\$118.50
11/13/2019	SAM	Prepared the attorneys' fees exhibit for C. Seymore; reviewed and revised the co-trustees settlement offer; conferred with attended conference call with C. Seymore (mediator) and	2.00 395.00/hr	Canda L160	\$790.00
11/14/2019	SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Canda L160	\$79.00
11/17/2019	SAM	Reviewed correspondence from C. Schwager re new counsel re C. Curtis; prepared correspondence to the mediator re same; prepared correspondence to	0.60 395.00/hr	Canda L160	\$237.00
11/18/2019	MT	Updated litigation index re notice of hearing for second motion for contempt and sanctions; reviewed and prepared docket matters re same; prepared notice of intent to take the deposition of C. Curtis.	0.50 129.50/hr	Canda L140	\$64.75

		<u>Hrs/Rate</u>		<u>Amount</u>	
11/18/2019	SAM	Reviewed correspondence from and prepared correspondence to	2.00 395.00/hr	Canda L120	\$790.00
	SAM	Prepared for and attended the conference call with C. Seymore and N. Spielman re settlement issues.	0.50 395.00/hr	Canda L160	\$197.50
11/19/2019	MT	Updated litigation index re C. Curtis' bill of review and notice of appearance.	0.20 129.50/hr	Canda L210	\$25.90
	SAM	Reviewed correspondence from C. Seymore re settlement of the case; prepared correspondence to C. Seymore re same; prepared correspondence to	1.50 395.00/hr	Canda L160	\$592.50
	SAM	Reviewed bill of review filed by C. Curtis; prepared correspondence to C. Seymore re same; prepared correspondence to	0.50 395.00/hr	Canda L210	\$197.50
11/20/2019	SAM	Reviewed correspondence from and prepared correspondence to reviewed correspondence from N. Spielman and C. Seymore re same.	0.90 395.00/hr	Canda L160	\$355.50
11/21/2019	SAM	Reviewed correspondence from N. Spielman and C. Seymore re settlement issues; prepared correspondence to reviewed correspondence from reviewed the revised asset summary.	0.80 395.00/hr	Canda L160	\$316.00
11/22/2019	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to C. Seymore the co-trustees settlement proposal; prepared for and attended the reviewed correspondence from the mediator re same; prepared correspondence to	1.00 395.00/hr	Canda L160	\$395.00

			<u>Hrs/Rate</u>		<u>Amount</u>
12/5/2019	SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Litiga L160	NO CHARGE
12/11/2019	EJW	Conferred with	0.20 250.00/hr	Canda L190	NO CHARGE
	MT	Updated litigation index re first amended notice of hearing re motion to appoint a personal representative; reviewed court's docket re pending motions.	0.30 129.50/hr	Canda L140	\$38.85
	SAM	Conferred with reviewed the file memo re same.	0.30 395.00/hr	Canda L210	\$118.50
	EJW	Reviewed file re outstanding issues for hearing; prepared correspondence to	0.80 250.00/hr	Canda L190	NO CHARGE
12/12/2019	SAM	Conferred with	0.50 395.00/hr	Canda L250	\$197.50
	EJW	Conferred with	0.20 250.00/hr	Canda L250	NO CHARGE
12/13/2019	SAM	Reviewed correspondence from and prepared correspondence to ; conferred with	0.30 395.00/hr	Canda L160	\$118.50
1/9/2020	SAM	Conferred with prepared the first supplemental petition; prepared correspondence to	0.80 395.00/hr	Canda L210	\$316.00
	EJW	Conferred with	0.20 250.00/hr	Canda L190	NO CHARGE
	SAM	Revised the settlement proposal; prepared correspondence to	1.50 395.00/hr	Canda L160	\$592.50
1/10/2020	MT	Filed first supplemental petition.	0.20 129.50/hr	Canda L210	\$25.90

		<u>Hrs/Rate</u>		<u>Amount</u>
1/10/2020	SAM	1.50 395.00/hr	Canda L210	\$592.50
	EJW	0.20 250.00/hr	Canda L120	NO CHARGE
	SAM	2.50 395.00/hr	Canda L230	\$987.50
1/12/2020	SAM	0.80 395.00/hr	Canda L130	\$316.00
	SAM	0.80 395.00/hr	Canda L120	\$316.00
1/13/2020	MT	0.10 129.50/hr	Canda L140	NO CHARGE
	SAM	3.50 395.00/hr	Canda L160	\$1,382.50
	SAM	0.60 395.00/hr	Canda L130	\$237.00
1/14/2020	SAM	0.50 395.00/hr	Trust L120	\$197.50

		<u>Hrs/Rate</u>		<u>Amount</u>
1/15/2020	SAM	0.60 395.00/hr	Canda L160	\$237.00
1/16/2020	MT	0.10 129.50/hr	Canda L140	NO CHARGE
	SAM	0.20 395.00/hr	Canda L160	\$79.00
1/18/2020	SAM	0.80 395.00/hr	Canda L160	\$316.00
1/23/2020	SAM	0.30 395.00/hr	Trust L120	\$118.50
1/25/2020	SAM	1.30 395.00/hr	Trust L120	\$513.50
1/27/2020	SAM	1.30 395.00/hr	Canda L160	\$513.50
1/28/2020	MT	0.20 129.50/hr	Litiga L320	NO CHARGE
	SAM	0.40 395.00/hr	Canda L120	\$158.00

		<u>Hrs/Rate</u>		<u>Amount</u>
	with L. Diaz re same; reviewed the file re same; reviewed correspondence from and prepared correspondence to			
1/29/2020 SAM	Reviewed and revised the 2019 semi-annual accounting; prepared correspondence to all parties re same; conferred with and prepared correspondence to	1.30 395.00/hr	Trust L120	\$513.50
L-Ast	Prepared multiple correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting re accounting update.	1.10 95.00/hr	Trust L150	\$104.50
1/30/2020 SAM	Conferred with the CPA re tax returns to produce; prepared correspondence to the CPA re same; prepared the draft order of the results of the January 10, 2020 hearing; prepared correspondence to the parties re same; conferred with Judge Davidson's office re mediation; reviewed correspondence from Judge Davidson's office re same; reviewed correspondence from Rich Rikkers re local Iowa counsel; prepared correspondence to and reviewed correspondence from the firm of Crary Huff (Iowa) and J. Johnson re same; conferred with reviewed correspondence from and prepared correspondence to mediation issues.	2.20 395.00/hr	Canda L190	\$869.00
2/1/2020 SAM	Finalized the draft order re the January 2020 hearing; prepared multiple correspondence to the parties re same.	0.50 395.00/hr	Trust L230	\$197.50
2/2/2020 SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Canda L160	\$79.00

		<u>Hrs/Rate</u>		<u>Amount</u>
2/2/2020 SAM	Conferred with L. Diaz re trust accounting issues; prepared correspondence to the parties re same; conferred with R. Ridders (Iowa CPA) re the 2018 tax returns.	0.50 395.00/hr	Trust L150	\$197.50
2/3/2020 SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re the draft order for the January 10, 2020 hearing based on B. Bayless's suggestions; revised same; prepared correspondence to	0.40 395.00/hr	Canda L250	\$158.00
SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re the appraisal; reviewed the appraisal.	0.40 395.00/hr	Trust L120	\$158.00
2/5/2020 SAM	Conferred with prepared for and attended a conference call with N. Spielman and B. Bayless re settlement; prepared file memo re same; revised the draft order re same.	1.60 395.00/hr	Canda L160	\$632.00
2/8/2020 SAM	Prepared draft order re the January 10, 2020 hearing; prepared correspondence to B. Bayless and N. Spielman re same.	1.00 395.00/hr	Canda L250	\$395.00
2/12/2020 SAM	Reviewed and revised the proposed mediation order; reviewed correspondence from and prepared correspondence to N. Spielman and B. Bayless re same; reviewed correspondence from and prepared correspondence to	0.70 395.00/hr	Canda L160	\$276.50
2/13/2020 SAM	Reviewed correspondence from reviewed correspondence from B. Bayless re same; prepared correspondence to and reviewed correspondence from	0.40 395.00/hr	Canda L120	\$158.00
2/15/2020 SAM	Prepared the agreed mediation order; prepared correspondence to the parties re same.	0.50 395.00/hr	Canda L160	\$197.50

		<u>Hrs/Rate</u>		<u>Amount</u>
2/17/2020	SAM	0.20 395.00/hr	Canda L160	\$79.00
Prepared correspondence to and reviewed correspondence from C. Schwager and C. Reed re status of the agreed mediation order.				
2/18/2020	SAM	0.50 395.00/hr	Canda L240	\$197.50
Reviewed correspondence from and prepared correspondence to				
2/19/2020	SAM	0.50 395.00/hr	Canda L250	\$197.50
Reviewed multiple correspondence from and prepared correspondence to B. Bayless, A. Brunsting, N. Spielman, and Carole Brunsting re the proposed January 2020 order.				
2/20/2020	EJW	1.00 250.00/hr	Canda L250	\$250.00
Prepared motion for order to mediate; revised proposed order re same.				
	SAM	1.80 395.00/hr	Canda L250	\$711.00
Prepared the joint motion for the mediation order; filed and served same; prepared correspondence to Judge Comstock re same; conferred several times with				
2/21/2020	MT	0.10 129.50/hr	Canda L140	NO CHARGE
Updated litigation index re motion for mediation order and proposed order.				
2/24/2020	MT	0.20 129.50/hr	Canda L190	NO CHARGE
Updated litigation index re C. Curtis' requests for citation on all parties re bill of review.				
	SAM	1.00 395.00/hr	Canda L160	\$395.00
Reviewed multiple correspondence from and prepared multiple correspondence to C. Schwager re the court ordered mediation.				
2/25/2020	SAM	1.00 395.00/hr	Canda L160	\$395.00
Reviewed multiple correspondence from and prepared multiple correspondence to C. Schwager re the court ordered mediation; reviewed correspondence from				
2/26/2020	SAM	1.30 395.00/hr	Canda L160	\$513.50
Reviewed correspondence from the court re the modified mediation order; revised same; prepared correspondence to N. Spielman and B. Bayless re same.				

		<u>Hrs/Rate</u>		<u>Amount</u>
2/26/2020	SAM	0.70 395.00/hr	Canda L160	\$276.50
	SAM	0.60 395.00/hr	Canda L160	\$237.00
2/27/2020	SAM	1.30 395.00/hr	Canda L160	\$513.50
2/28/2020	SAM	0.40 395.00/hr	Canda L160	\$158.00
3/13/2020	SAM	1.00 395.00/hr	Canda L160	\$395.00
3/14/2020	SAM	0.40 395.00/hr	Canda L160	\$158.00
	SAM	0.40 395.00/hr	Canda L210	\$158.00
3/15/2020	SAM	0.30 395.00/hr	Canda L160	\$118.50
3/21/2020	SAM	0.30 395.00/hr	Canda L160	\$118.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
3/21/2020	SAM	Reviewed correspondence from C. Schwager re accounting issues and the 2018 tax return; reviewed the file re same.	0.30 395.00/hr	Canda L120	\$118.50
3/24/2020	MT	Reviewed and prepared docket matters re response to citation re bill of review.	0.20 129.50/hr	Canda L190	NO CHARGE
3/25/2020	SAM	Reviewed correspondence from C. Schwager re production issues; reviewed correspondence from	0.20 395.00/hr	Canda L320	\$79.00
4/16/2020	SAM	Reviewed the bill of review; prepared correspondence to	0.60 395.00/hr	Canda L210	\$237.00
4/17/2020	SAM	Reviewed correspondence from C. Schwager re the forensic examination; reviewed the credentials of C. Baggett.	0.40 395.00/hr	Canda L130	\$158.00
4/22/2020	SAM	Reviewed correspondence from conferred with ; prepared correspondence to	0.80 395.00/hr	Canda L120	\$316.00
	SAM	Reviewed correspondence from and prepared correspondence to J. Johnson re Iowa farm issues; reviewed correspondence from	0.80 395.00/hr	Canda L120	\$316.00
	SAM	Reviewed correspondence from prepared the settlement analysis; prepared correspondence to	1.50 395.00/hr	Canda L160	\$592.50
4/24/2020	SAM	Prepared for and attended conference call with Anita Brunsting, Amy Brunsting, and Neal Spielman.	2.50 395.00/hr	Canda L160	\$987.50
	SAM	Reviewed the file re Iowa farm issues; prepared correspondence to J. Jefferson re same.	0.30 395.00/hr	Canda L190	\$118.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
4/27/2020	SAM	Reviewed correspondence from and prepared correspondence to	0.40 395.00/hr	Canda L160	\$158.00
4/29/2020	SAM	Reviewed correspondence from and prepared correspondence to S. Saylor re Iowa partition issues; reviewed correspondence from C. Curtis re trust disbursements.	0.60 395.00/hr	Canda L190	\$237.00
	SAM	Reviewed correspondence from	0.20 395.00/hr	Canda L130	\$79.00
5/3/2020	SAM	Prepared the global settlement offer.	3.50 395.00/hr	Canda L160	\$1,382.50
5/4/2020	SAM	Conferred with conferred with reviewed and revised the settlement proposal; prepared correspondence to conferred with	2.30 395.00/hr	Canda L160	\$908.50
	EJW	Conferred with	0.20 250.00/hr	Litiga L120	\$50.00
5/5/2020	SAM	Prepared correspondence to Judge Davidson re mediation of the case; conferred with revised the settlement agreement re same; prepared additional correspondence to	1.30 395.00/hr	Canda L160	\$513.50
	SAM	Reviewed the attorneys' fees and expense billing records; conferred with	0.40 395.00/hr	Litiga L190	\$158.00
	SAM	Conferred with C. Schwager re forensic examination and mediation; prepared correspondence to prepared correspondence to and reviewed correspondence from	2.20 395.00/hr	Canda L130	\$869.00

			<u>Hrs/Rate</u>		<u>Amount</u>
		prepared correspondence to C. Baggett re forensic issues that may lead to settlement of the case.			
5/6/2020	SAM	Prepared the 2017 - 2019 federal tax returns for production.	0.20 395.00/hr	Trust L320	\$79.00
	EJW	Conferred with	0.20 250.00/hr	Litiga L120	\$50.00
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	1.10 150.00/hr	Litiga L190	\$165.00
	SAM	Conferred several times with	0.80 395.00/hr	Litiga L190	\$316.00
	SAM	Reviewed the historical invoices for production purpose; conferred with prepared correspondence to	0.40 395.00/hr	Litiga L190	\$158.00
5/7/2020	SAM	Reviewed correspondence from the CPA re the 2017 - 2019 federal tax returns; prepared the 2017 - 2019 tax returns for production; prepared correspondence to the parties re same.	2.00 395.00/hr	Trust L320	\$790.00
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	2.40 150.00/hr	Litiga L190	\$360.00
	SAM	Reviewed correspondence from reviewed prior correspondence from C. Schwager re same.	0.20 395.00/hr	Canda L320	\$79.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
5/8/2020	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	1.80 150.00/hr	Canda L190	\$270.00
	SAM	Reviewed multiple correspondence by and between N. Spielman and C. Schwager re forensic examination and mediation issues.	0.50 395.00/hr	Canda L130	\$197.50
	SAM	Reviewed correspondence from C. Schwager re the 2017 - 2019 tax returns; reviewed the file re same; resent the same prior correspondence to C. Schwager; conferred with	1.20 395.00/hr	Canda L150	\$474.00
5/10/2020	SAM	Reviewed correspondence from and prepared correspondence to C. Schwager re C. Kunz-Freed deposition.	0.30 395.00/hr	Canda L330	\$118.50
5/11/2020	SAM	Reviewed the file re pending administration issues; prepared correspondence to	0.30 395.00/hr	Trust L190	\$118.50
	SAM	Conferred several times with	0.50 395.00/hr	Litiga L190	\$197.50
	EJW	Conferred with	0.30 250.00/hr	Litiga L190	\$75.00
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	8.10 150.00/hr	Litiga L190	\$1,215.00
	SAM	Conferred several times with reviewed the file re same.	0.40 395.00/hr	Litiga L390	\$158.00
5/12/2020	SAM	Prepared for and attended the conference call with	0.80 395.00/hr	Canda L120	\$316.00

		<u>Hrs/Rate</u>		<u>Amount</u>
5/12/2020 MT	Conferred with Judge Davidson's office re mediation memo and mediation fees; prepared correspondence to Judge Davidson re same.	0.30 129.50/hr	Canda L190	\$38.85
SAM	Prepared correspondence to B. Bayless re settlement issues; prepared for and attended the settlement conference call with B. Bayless.	0.70 395.00/hr	Carl L160	\$276.50
SAM	Conferred several times with	0.80 395.00/hr	Litiga L190	\$316.00
SAM	Prepared for and attended the settlement conference call with prepared file memo re same; prepared for and attended the settlement conference call with prepared correspondence to Judge Davidson re parties to the mediation and confirmation of the date re same; prepared correspondence to and reviewed correspondence from Carole Brunsting re mediation of the case.	1.60 395.00/hr	Canda L160	\$632.00
ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	8.20 150.00/hr	Litiga L190	\$1,230.00
5/13/2020 EJW	Reviewed file re outstanding issues for attorneys' fees; conferred with conferred with	0.40 250.00/hr	Litiga L120	\$100.00
ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	7.90 150.00/hr	Litiga L190	\$1,185.00
SAM	Reviewed the planning instruments for issues re the mediation memorandum; reviewed correspondence from and prepared correspondence to	0.50 395.00/hr	Canda L160	\$197.50

			<u>Hrs/Rate</u>		<u>Amount</u>
5/13/2020	SAM	Reviewed C. Curtis' pleadings; reviewed issues related to same for the mediation of the case.	0.80 395.00/hr	Canda L210	\$316.00
	SAM	Reviewed correspondence from C. Schwager re forensic examination issues; reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L130	\$118.50
5/14/2020	EJW	Conferred with reviewed and redacted same; conferred with	1.50 250.00/hr	Litiga L120	\$375.00
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	8.40 150.00/hr	Litiga L190	\$1,260.00
5/15/2020	EJW	Conferred with	0.90 250.00/hr	Litiga L120	\$225.00
	MT	Reviewed correspondence from Judge Davidson; prepared mediation letter information form.	0.30 129.50/hr	Canda L190	\$38.85
	SAM	Reviewed the correspondence from Judge Davidson; reviewed and edited mediation letter information form.	0.50 395.00/hr	Canda L190	\$197.50
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	3.60 150.00/hr	Litiga L190	\$540.00
5/16/2020	SAM	Conferred several times with	0.50 395.00/hr	Litiga L190	\$197.50
5/18/2020	SAM	Prepared the attorneys' fees billing and expense records; conferred with	0.60 395.00/hr	Litiga L190	\$237.00

		<u>Hrs/Rate</u>		<u>Amount</u>
5/18/2020	ROC	8.00 150.00/hr	Litiga L190	\$1,200.00
	SAM	0.30 395.00/hr	Canda L130	\$118.50
5/19/2020	MT	0.40 129.50/hr	Litiga L210	\$51.80
	SAM	0.60 395.00/hr	Litiga L190	\$237.00
	ROC	8.30 150.00/hr	Litiga L190	\$1,245.00
5/20/2020	SAM	0.50 395.00/hr	Litiga L120	\$197.50
	ROC	3.90 150.00/hr	Litiga L190	\$585.00
5/21/2020	SAM	0.50 395.00/hr	Litiga L190	\$197.50
	ROC	8.10 150.00/hr	Litiga L190	\$1,215.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
5/22/2020	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	3.60 150.00/hr	Litiga L190	\$540.00
	SAM	Reviewed the file re correspondence to and correspondence from Judge Davidson's office re mediation of the case; reviewed and revised the case party summary requested by Judge Davidson; prepared correspondence to Judge Davidson re same.	0.60 395.00/hr	Litiga L160	\$237.00
	SAM	Reviewed the attorneys' fees billing and expense records; conferred with	0.70 395.00/hr	Litiga L190	\$276.50
	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to reviewed correspondence from and prepared correspondence to	0.50 395.00/hr	Canda L130	\$197.50
5/25/2020	SAM	Reviewed correspondence from and prepared correspondence to Judge Davidson the mediation of the case and party information re same; reviewed correspondence from and prepared correspondence to B. Bayless re settlement issues.	0.60 395.00/hr	Canda L160	\$237.00
5/26/2020	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	7.60 150.00/hr	Litiga L190	\$1,140.00
	SAM	Reviewed correspondence from reviewed authorities re prepared correspondence to	0.50 395.00/hr	Canda L130	\$197.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
5/27/2020	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared affidavit re same; conferred several times with	4.60 150.00/hr	Litiga L190	\$690.00
	SAM	Reviewed correspondence from	0.30 395.00/hr	Canda L160	\$118.50
	SAM	Reviewed and revised the joint settlement demand re Vacek & Freed; prepared correspondence to	0.50 395.00/hr	Canda L160	\$197.50
5/28/2020	SAM	Reviewed the file re mediation issues; prepared correspondence to and reviewed correspondence from prepared correspondence to and reviewed correspondence from prepared the master settlement agreement; conferred with	1.50 395.00/hr	Litiga L160	\$592.50
	SAM	Reviewed the attorneys' fees billing and expense records; conferred with	0.50 395.00/hr	Litiga L190	\$197.50
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared Settlement Agreement and Mutual Release; conferred several times with	8.90 150.00/hr	Litiga L190	\$1,335.00
	SAM	Reviewed multiple correspondence from	0.30 395.00/hr	Canda L190	\$118.50
5/29/2020	SAM	Reviewed the attorneys' fees billing and expense records; conferred with reviewed and revised the master settlement agreement; reviewed correspondence from	1.00 395.00/hr	Litiga L160	\$395.00

	<u>Hrs/Rate</u>		<u>Amount</u>
5/29/2020 SAM Reviewed file re proposed forensic examiners.	0.30 395.00/hr	Canda L130	\$118.50
ROC Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared Settlement Agreement and Mutual Release; conferred several times with	9.00 150.00/hr	Litiga L440	\$1,350.00
For professional services rendered	<u>1075.80</u>		<u>\$274,119.35</u>
Additional Charges :			
6/21/2016 Trial transcripts.			\$70.00
12/19/2017 Courier. FedEx.			\$17.31
8/28/2018 Filing fees re defendants' joint motion for continuance regarding Carl Brunsting's motion for partial summary judgment.			\$2.06
Filing fees re order granting defendants' motion for continuance regarding Carl Brunsting's motion for partial summary judgment.			\$2.06
Filing fees re notice of hearing on defendants' joint motion for continuance regarding Carl Brunsting's motion for partial summary judgment			\$2.06
8/29/2018 Filing fees re defendants' joint response to plaintiff's motion for partial summary judgment.			\$2.06
8/30/2018 Filing fees re order denying plaintiff's motion for partial summary judgment.			\$2.06
9/4/2018 Copy			\$16.80
Fax			\$8.40
10/31/2018 Filing fees re defendant A. Brunsting's notice of the oral and/or video deposition of C. Kunz-Freed			\$2.06

	<u>Amount</u>
12/19/2018 Service of subpoena on C. Kunz-Freed re deposition.	\$95.00
1/16/2019 Filing fees re A. Brunsting's response to C. Kunz-Freed's motions to quash and for protection.	\$2.06
1/24/2019 Parking and local travel.	\$10.00
1/28/2019 Filing fees re A. Brunsting's motion to obtain appraisal.	\$2.06
Filing fees re proposed order granting appraisal.	\$2.06
1/29/2019 Filing fees re Anita Brunsting's motion to join Amy Brunsting's motion for clarification and/or motion to dismiss.	\$2.06
2/8/2019 Filing fees re notice of hearing for motion to obtain appraisal.	\$2.06
3/6/2019 Copy	\$6.40
3/19/2019 Copies within the Firm.	\$187.20
Copy	\$2.00
Copy	\$32.40
Copy	\$9.00
Fax	\$9.20
Fax	\$7.20
Fax	\$17.40
Fax	\$12.20
3/20/2019 Parking re deposition of C. Kunz-Freed.	\$6.00
5/17/2019 Filing fees re notice of intention to continue deposition of C. Kunz-Freed.	\$2.06
6/7/2019 Deposition transcript of Candace Kunz-Freed.	\$2,263.42

	<u>Amount</u>
6/25/2019 Fax	\$13.20
6/26/2019 Fax	\$17.60
6/27/2019 Parking and local travel.	\$15.00
7/1/2019 Parking and local travel.	\$10.00
8/2/2019 Deposition transcript of C. Kunz-Freed.	\$1,551.33
5/19/2020 Copies from court re affidavit.	\$1.00
Total additional charges	<u>\$4,406.90</u>

The Mendel Law Firm, L.P.

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Pflugerville, TX 78660

In Reference To: C.A. No. 412249 & 412249-401; *Candace Curtis v. Anita Brunsting, Et Al*; In Probate Court No. 4, Harris County, Texas.

C.A. No. 412249 & 412249-402; *Candace Curtis v. Anita Brunsting, Et Al - Plea in Abatement*; In Probate Court No. 4, Harris County, Texas.

C.A. No. 412249 & 412249-403; *Carl Henry Brunsting, Executor of the Estates of Elmer H. Brunsting & Nelva E. Brunsting; v. Candace L. Kunz-Greed & Vacek & Freed, PLLC*; In Probate Court No. 4, Harris County, Texas (transfer of C.A. 2013-05455 from the 164th District Court, Harris County, Texas).

C.A. No. 412249 & 412249-404; *Candace Curtis v. Anita Brunsting, Et Al - Bill of Review*; In Probate Court No. 4, Harris County, Texas.

Professional Services

		<u>Hrs/Rate</u>		<u>Amount</u>
6/1/2020 ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared [REDACTED] [REDACTED] conferred several times with [REDACTED] re [REDACTED]	7.70 60.00/hr	Litiga L160	\$462.00
SAM	Prepared correspondence to M. Wakshull re forensic issues; conferred several times with M. Wakshull re same; prepared correspondence to [REDACTED] re [REDACTED] prepared correspondence to [REDACTED] re [REDACTED] reviewed authorities re [REDACTED]	2.80 395.00/hr	Canda L130	\$1,106.00

			<u>Hrs/Rate</u>		<u>Amount</u>
6/1/2020	SAM	Reviewed and organized the attorneys' fees billing and expense records.	0.50 395.00/hr	Litiga L190	\$197.50
6/2/2020	SAM	Reviewed multiple correspondence from [REDACTED] re [REDACTED] prepared correspondence to B. Bayless re same; conferred with B. Bayless re same.	0.60 395.00/hr	Canda L130	\$237.00
	SAM	Reviewed correspondence from B. Bayless re insurance issues; reviewed the Vacek Defendants response to requests for disclosure.	0.30 395.00/hr	Canda L110	\$118.50
	SAM	Reviewed correspondence from B. Bayless re settlement issues; prepared correspondence to [REDACTED] re [REDACTED]	0.20 395.00/hr	Carl L160	\$79.00
6/4/2020	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared [REDACTED] [REDACTED] conferred several times with [REDACTED] re [REDACTED]	4.20 60.00/hr	Litiga L440	\$252.00
6/5/2020	SAM	Reviewed and organized the attorneys' fees billing and expense records; conferred with G. Saunders re same.	0.50 395.00/hr	Litiga L120	\$197.50
	SAM	Reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] [REDACTED]	0.50 395.00/hr	Canda L120	\$197.50
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared [REDACTED] [REDACTED] conferred several times with [REDACTED] re [REDACTED]	3.50 60.00/hr	Litiga L190	\$210.00
6/7/2020	SAM	Prepared correspondence to [REDACTED] re [REDACTED]	0.20 395.00/hr	Litiga L160	\$79.00

		<u>Hrs/Rate</u>		<u>Amount</u>
6/8/2020	SAM	0.20	Canda	
		395.00/hr	L120	\$79.00
	ROC	7.90	Litiga	
		60.00/hr	L160	\$474.00
6/9/2020	SAM	0.40	Canda	
		395.00/hr	L240	\$158.00
6/10/2020	SAM	1.00	Canda	
		395.00/hr	L130	\$395.00
	ROC	4.20	Litiga	
		60.00/hr	L160	\$252.00
6/11/2020	ROC	3.00	Litiga	
		60.00/hr	L190	\$180.00
	SAM	2.50	Canda	
		395.00/hr	L390	\$987.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
6/11/2020	SAM	Reviewed multiple correspondence from and prepared correspondence to ██████████ re ██████████ reviewed correspondence from ██████████ re ██████████	0.50 395.00/hr	Trust L190	\$197.50
	SAM	Reviewed multiple correspondence from B. Bayless and N. Spielman re settlement issues.	0.30 395.00/hr	Litiga L160	\$118.50
6/12/2020	MT	Updated discovery index re C. Kunz-Freed's second supplemental response to request for disclosure.	0.20 129.50/hr	Litiga L310	\$25.90
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared ██████████ ██████████ conferred several times with ██████████ re ██████████	5.20 60.00/hr	Litiga L190	\$312.00
	SAM	Conferred with ██████████ re ██████████ ██████████ reviewed and organized the accounting files re same.	2.40 395.00/hr	Trust L150	\$948.00
	KSM	Conferred with ██████████ re ██████████ ██████████ reviewed and organized the files re same; prepared the trust accounting.	3.00 129.50/hr	Trust L150	\$388.50
	SAM	Reviewed and revised ██████████ ██████████	1.10 395.00/hr	Litiga L160	\$434.50
6/13/2020	SAM	Reviewed and revised the January 2020 to April 2020 trust accounting; prepared correspondence to the parties re same; prepared correspondence to the parties re the 2019 tax return and 2019 appraisal; reviewed the farm agreement.	2.50 395.00/hr	Trust L150	\$987.50
	KSM	Prepared the trust accounting reports.	1.00 129.50/hr	Trust L150	\$129.50

		<u>Hrs/Rate</u>		<u>Amount</u>
6/15/2020	ROC	4.20 60.00/hr	Litiga L190	\$252.00
	SAM	5.20 395.00/hr	Litiga L160	\$2,054.00
6/16/2020	ROC	4.90 60.00/hr	Litiga L190	\$294.00
	SAM	1.50 395.00/hr	Litiga L160	\$592.50
	SAM	0.50 395.00/hr	Litiga L150	\$197.50
6/17/2020	SAM	1.00 395.00/hr	Litiga L160	\$395.00
	ROC	7.70 60.00/hr	Litiga L440	\$462.00

			<u>Hrs/Rate</u>		<u>Amount</u>
6/17/2020	SAM	Reviewed the court's file re the petition to enforce a foreign (federal) judgment; reviewed the federal court file; reviewed authorities re [REDACTED]	1.00 395.00/hr	Canda L210	\$395.00
	SAM	Reviewed correspondence from C. Curtis re settlement; prepared correspondence to C. Schwager re same; prepared correspondence to [REDACTED] re [REDACTED]	1.00 395.00/hr	Canda L160	\$395.00
6/18/2020	ACD	Reviewed mediation memo for Judge Davidson.	0.20 129.50/hr	Litiga L160	\$25.90
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared [REDACTED] conferred several times with [REDACTED] re [REDACTED]	6.50 60.00/hr	Litiga L440	\$390.00
	SAM	Reviewed and revised the mediation memorandum; prepared correspondence to [REDACTED] re [REDACTED] prepared correspondence to [REDACTED] re [REDACTED]	1.50 395.00/hr	Litiga L160	\$592.50
6/19/2020	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared [REDACTED] conferred several times with [REDACTED] re [REDACTED]	5.20 60.00/hr	Litiga L320	\$312.00
	SAM	Reviewed correspondence from and prepared correspondence to C. Reed re production of the insurance policy.	0.20 395.00/hr	Litiga L310	\$79.00
6/22/2020	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared [REDACTED] conferred several times with [REDACTED] re [REDACTED]	6.60 60.00/hr	Litiga L190	\$396.00
	SAM	Conferred with [REDACTED] re [REDACTED]	0.30 395.00/hr	Litiga L160	\$118.50

			<u>Hrs/Rate</u>		<u>Amount</u>
6/22/2020	SAM	Conferred with [REDACTED] re [REDACTED] [REDACTED]	0.30 395.00/hr	Litiga L440	\$118.50
	SAM	Reviewed the accounting records for additional trust accountings to the parties.	0.50 395.00/hr	Trust L150	\$197.50
6/23/2020	SAM	Reviewed and revised the billing and accounting records for the mediation.	0.80 395.00/hr	Trust L150	\$316.00
	SAM	Prepared for the mediation of the case; prepared correspondence to [REDACTED] re [REDACTED]	0.50 395.00/hr	Litiga L160	\$197.50
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; prepared [REDACTED] conferred several times with [REDACTED] re [REDACTED]	5.90 60.00/hr	Litiga L190	\$354.00
	SAM	Reviewed correspondence from and prepared correspondence to C. Reed re disclosure of the Vacek insurance policy.	0.20 395.00/hr	Trust L320	\$79.00
6/24/2020	SAM	Reviewed the file re [REDACTED] prepared correspondence to [REDACTED] re [REDACTED]	0.20 395.00/hr	Litiga L440	\$79.00
	SAM	Prepared for the mediation of the case; conferred with Judge Davidson re same; conferred several times with [REDACTED] re [REDACTED] met with [REDACTED] re [REDACTED] reviewed correspondence from [REDACTED] and prepared correspondence to C. Schwager re settlement; prepared correspondence to B. Bayless re same; prepared correspondence to [REDACTED] re [REDACTED]	6.50 395.00/hr	Litiga L160	\$2,567.50
	ROC	Prepared Mediation exhibit re [REDACTED] [REDACTED] Conferred with [REDACTED] several times re [REDACTED]	6.30 60.00/hr	Trust L440	\$378.00
	SAM	Reviewed and updated the file re [REDACTED] [REDACTED]	0.50 395.00/hr	Trust L150	\$197.50

		<u>Hrs/Rate</u>		<u>Amount</u>
6/25/2020	SAM Prepared for and attended the mediation of the case; conferred several times with [REDACTED] [REDACTED] re [REDACTED] from and prepared correspondence to Carole Brunsting re the mediation; conferred with Carole Brunsting re same; prepared correspondence to [REDACTED] re [REDACTED]	11.00 395.00/hr	Litiga L160	\$4,345.00
6/29/2020	SAM Prepared for and conferred with [REDACTED] re [REDACTED] prepared correspondence to Judge Davidson re notice to the court re mediation held and not successful.	1.20 395.00/hr	Litiga L160	\$474.00
6/30/2020	SAM Reviewed correspondence from [REDACTED] re [REDACTED] reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] conferred with [REDACTED] re [REDACTED] prepared file memo re [REDACTED]	0.90 395.00/hr	Litiga L160	\$355.50
	SAM Updated the accounting records.	0.40 395.00/hr	Trust L150	\$158.00
7/1/2020	SAM Reviewed correspondence from the mediator re the mediator's proposal was not accepted; prepared correspondence to the court re same; reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] reviewed correspondence from [REDACTED] re [REDACTED]	0.50 395.00/hr	Litiga L160	\$197.50
7/2/2020	MT Updated litigation index re C. Kunz-Freed's second amended notice of hearing re appointment of personal representative; reviewed and prepared docket matters re same.	0.30 129.50/hr	Litiga L190	\$38.85
	SAM Reviewed and organized the trust accountin records.	1.00 395.00/hr	Trust L150	\$395.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
7/3/2020	SAM	Reviewed correspondence from and prepared correspondence to B. Bayless settlements issues and the tolling agreement.	0.30 395.00/hr	Litiga L160	\$118.50
7/6/2020	MT	Updated litigation index re original answer and motion to transfer and for sanctions.	0.20 129.50/hr	Litiga L250	NO CHARGE
7/7/2020	SAM	Prepared for and attended the conference call with [REDACTED] re [REDACTED]	0.80 395.00/hr	Litiga L120	\$316.00
	SAM	Reviewed the accounting records; processed the return of trust funds to the Bank of America accounts re the mediator's fee, if the parties had agreed to the use of trust funds.	0.60 395.00/hr	Trust L150	\$237.00
7/8/2020	MT	Updated litigation index re amended notice of hearing re appointment for personal representative.	0.10 129.50/hr	Litiga L190	NO CHARGE
	SAM	Prepared correspondence to C. Schwager re the depositon of C. Curtis; prepared correspondence to [REDACTED] re [REDACTED]	0.40 395.00/hr	Canda L330	\$158.00
	SAM	Prepared correspondence to [REDACTED] re [REDACTED]	0.20 395.00/hr	Canda L330	\$79.00
7/9/2020	SAM	Reviewed correspondence from and prepared correspondence to Judge Comstock re hearing dates for pending issues; prepared correspondence to C. Reed re same; conferred with [REDACTED] re [REDACTED]	0.60 395.00/hr	Litiga L230	\$237.00
7/10/2020	SAM	Reviewed multiple correspondence by and among the parties re a hearing on various motions; conferred with [REDACTED] re [REDACTED]	0.40 395.00/hr	Litiga L230	\$158.00
	SAM	Reviewed the tolling agreement from B. Bayless; prepared correspondence to B. Bayless re same; prepared correspondence to and reviewed correspondence from [REDACTED] re [REDACTED]	0.50 395.00/hr	Carl L190	\$197.50

		<u>Hrs/Rate</u>		<u>Amount</u>
7/13/2020	MT	0.20 129.50/hr	Litiga L250	\$25.90
	SAM	0.40 395.00/hr	Litiga L250	\$158.00
7/14/2020	MT	0.10 129.50/hr	Litiga L190	NO CHARGE
	ACD	0.20 129.50/hr	Litiga L320	NO CHARGE
7/20/2020	MT	0.50 129.50/hr	Canda L330	\$64.75
	SAM	0.60 395.00/hr	Canda L330	\$237.00
	SAM	0.70 395.00/hr	Canda L120	\$276.50
	SAM	0.50 395.00/hr	Canda L210	\$197.50
7/22/2020	SAM	0.20 395.00/hr	Canda L210	\$79.00
7/23/2020	SAM	0.80 395.00/hr	Canda L310	\$316.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
7/23/2020	MT	Updated litigation index re C. Curtis' objection to deposition and motion for protective order; prepared correspondence to Carol Davis re same.	0.40 129.50/hr	Canda L210	\$51.80
7/27/2020	SAM	Reviewed C. Curtis' motion to quash her deposition.	0.20 395.00/hr	Canda L350	\$79.00
7/29/2020	SAM	Prepared correspondence to [REDACTED] re [REDACTED] [REDACTED]	0.20 395.00/hr	Carl L240	\$79.00
7/30/2020	EJW	Revised response to Carl's motion for summary judgment.	2.00 250.00/hr	Carl L240	\$500.00
	SAM	Prepared response to Carl Brunsting's partial motion for summary judgment; prepared the exhibits re same; prepared multiple correspondence to and reviewed multiple correspondence from [REDACTED] re [REDACTED] filed and served the response on all parties.	7.70 395.00/hr	Carl L240	\$3,041.50
	EJW	Conferred with [REDACTED] several times re [REDACTED]	0.50 250.00/hr	Carl L240	NO CHARGE
7/31/2020	MT	Updated litigation index re response to C. Brunsting's motion for summary judgment with exhibits.	0.20 129.50/hr	Carl L240	NO CHARGE
8/2/2020	SAM	Prepared the motion to compel C. Curtis' deposition; filed and served same.	0.80 395.00/hr	Canda L350	\$316.00
	SAM	Reviewed the status of C. Curtis' various litigation matters.	0.60 395.00/hr	Canda L210	\$237.00
8/3/2020	MT	Updated litigation index re motion to compel the deposition of C. Curtis and Carl Brunsting's response to motion to appoint personal representative.	0.20 129.50/hr	Carl L250	\$25.90

			<u>Hrs/Rate</u>		<u>Amount</u>
8/3/2020	SAM	Reviewed the file re C. Curtis' litigation; prepared correspondence to the court re hearing on the motion to compel C. Curtis' deposition.	0.20 395.00/hr	Canda L230	\$79.00
	SAM	Prepared correspondence to and reviewed correspondence from B. Bayless re the pending hearing.	0.20 395.00/hr	Carl L230	\$79.00
8/4/2020	MT	Prepared and filed notice of hearing re motion to compel the deposition of C. Curtis; updated litigation index re same and Amy's motion to transfer and/or vacate.	0.60 129.50/hr	Canda L190	\$77.70
8/5/2020	MT	Updated litigation index re Carl Brunsting's reply to response to motion for summary judgment.	0.10 129.50/hr	Carl L190	NO CHARGE
8/6/2020	MT	Updated litigation index re C. Curtis' response to motion to transfer with multiple exhibits and Amy Brunsting's status report and request for additional relief; reviewed same.	0.40 129.50/hr	Canda L210	\$51.80
	SAM	Conferred with San Francisco court reporters re deposition for C. Curtis; prepared for and attended the Zoom hearing re motion to compel C. Curtis' deposition and denial of the motion for protection; reviewed multiple correspondence from C. Schwager re filings made to and pending in the federal district court.	1.30 395.00/hr	Canda L230	\$513.50
	SAM	Prepared for and attended the Zoom hearing re Carl Brunsting's motion for partial summary judgment.	3.00 395.00/hr	Carl L230	\$1,185.00
	SAM	Attended the Zoom hearing re motion to appoint a third party representative; conferred with [REDACTED] conferred with [REDACTED]	1.30 395.00/hr	Litiga L250	\$513.50
8/7/2020	SAM	Conferred with [REDACTED] re [REDACTED]	0.20 395.00/hr	Carl L240	\$79.00

			<u>Hrs/Rate</u>		<u>Amount</u>
8/8/2020	SAM	Prepared the proposed order compelling C. Curtis deposition; prepared correspondence to [REDACTED] re [REDACTED]	0.80 395.00/hr	Canda L350	\$316.00
	SAM	Prepared the proposed order on the issues to be briefed on Carl Brunsting's motion for partial summary judgment; prepared correspondence to [REDACTED] re [REDACTED]	0.70 395.00/hr	Carl L240	\$276.50
	SAM	Prepared the proposed order regarding the appointment of a personal representative for the Estate of Nelva E. Brunsting; prepared correspondence to [REDACTED] re [REDACTED]	0.50 395.00/hr	Litiga L250	\$197.50
8/9/2020	SAM	Reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED]	0.30 395.00/hr	Carl L240	\$118.50
8/10/2020	MT	Updated litigation index re co-trustee's original answer; reviewed same.	0.30 129.50/hr	Litiga L210	\$38.85
	SAM	Prepared the proposed order for the deposition of Candace Curtis; conferred with [REDACTED] re [REDACTED] prepared correspondence to the parties re same.	0.30 395.00/hr	Canda L330	\$118.50
	SAM	Prepared the proposed order for the briefing schedule on the issue of whether the QBD's are void; conferred with [REDACTED] re [REDACTED] prepared correspondence to the parties re same.	0.30 395.00/hr	Carl L240	\$118.50
	SAM	Prepared the proposed order for the appointment of a personal representative for the Estate of Nelva E. Brunsting; conferred with [REDACTED] re [REDACTED] prepared correspondence to the parties re same.	0.20 395.00/hr	Litiga L250	\$79.00
	SAM	Conferred with [REDACTED] re [REDACTED]	0.20 395.00/hr	Canda L250	\$79.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
8/10/2020	SAM	Reviewed the draft answer to C. Curtis' bill of review; prepared correspondence to ██████████ re ██████████	0.20 395.00/hr	Canda L210	\$79.00
8/11/2020	MT	Filed proposed order re deposition of C. Curtis, proposed order re Carl's partial motion for summary judgment, and proposed order re personal representative.	0.20 129.50/hr	Litiga L210	\$25.90
	SAM	Prepared the proposed order re the appointment of a personal representative to the Estate; prepared correspondence to the parties re same.	0.40 395.00/hr	Litiga L250	\$158.00
	SAM	Prepared the proposed order regarding the briefing schedule for Carl Brunsting's motion for partial summary judgment.	0.60 395.00/hr	Carl L240	\$237.00
	SAM	Prepared the proposed order re the deposition of C. Curtis; prepared correspondence to the parties re same.	0.60 395.00/hr	Canda L330	\$237.00
8/12/2020	MT	Updated litigation index re proposed orders re Carl Brunsting's motion for summary judgment.	0.20 129.50/hr	Carl L240	NO CHARGE
	SAM	Revised the proposed order re the briefing schedule; prepared correspondence to the parties re same.	0.20 395.00/hr	Carl L240	\$79.00
	SAM	Revised the proposed order re C. Curtis' deposition; prepared correspondence to the parties re same.	0.20 395.00/hr	Carl L330	\$79.00
	SAM	Revised the proposed order re C. Kunz-Freed motion to appoint a personal representative; reviewed correspondence from C. Reed re same; prepared correspondence to the parties re same.	0.20 395.00/hr	Litiga L250	\$79.00
8/13/2020	ACD	Prepared response to ex parte motion.	1.00 129.50/hr	Litiga L320	\$129.50

		<u>Hrs/Rate</u>		<u>Amount</u>
8/13/2020	SAM	2.80 395.00/hr	Canda L240	\$1,106.00
8/14/2020	MT	0.20 129.50/hr	Canda L210	NO CHARGE
	SAM	0.40 395.00/hr	Trust L190	\$158.00
	SAM	0.80 395.00/hr	Canda L240	\$316.00
8/18/2020	SAM	0.50 395.00/hr	Canda L120	\$197.50
	SAM	0.30 395.00/hr	Litiga L250	\$118.50
8/19/2020	SAM	0.20 395.00/hr	Canda L330	\$79.00
	SAM	0.80 395.00/hr	Canda L240	\$316.00
8/20/2020	MT	0.30 129.50/hr	Canda L210	\$38.85

		<u>Hrs/Rate</u>		<u>Amount</u>	
8/21/2020	SAM	Reviewed correspondence from the court reporter re additional court transcripts; prepared correspondence to [REDACTED] re [REDACTED]	0.30 395.00/hr	Litiga L230	\$118.50
8/22/2020	SAM	Reviewed the file and updated the accounting records.	0.30 395.00/hr	Trust L150	\$118.50
8/24/2020	MT	Updated litigation index re order regarding Carl Brunsting's motion for summary judgment; reviewed same; reviewed and prepared docket matters re deadline to file response and/or brief for same.	0.30 129.50/hr	Carl L210	\$38.85
8/28/2020	MT	Reviewed court's docket re Southern District case; prepared correspondence to S. Mendel and N. Spielman re same; updated litigation index re co-trustee's reply to C. Curtis' response to motion to transfer and/or vacate.	0.50 129.50/hr	Canda L210	\$64.75
	SAM	Reviewed correspondence from C. Schwager re the federal case and reopening of same; met with [REDACTED] re [REDACTED]	1.00 395.00/hr	Canda L250	\$395.00
	SAM	Met with [REDACTED] re [REDACTED]	0.50 395.00/hr	Carl L120	\$197.50
	SAM	Reviewed the file re deposition issues; prepared correspondence to [REDACTED] re [REDACTED]	0.20 395.00/hr	Canda L330	\$79.00
8/29/2020	SAM	Conferred with [REDACTED] re [REDACTED] reviewed correspondence from and prepared correspondence to the court reporter re other hearing transcripts; reviewed correspondence from and prepared correspondence to [REDACTED]	1.00 395.00/hr	Canda L190	\$395.00
	SAM	Reviewed the file [REDACTED] prepared correspondence to [REDACTED] re [REDACTED]	0.50 395.00/hr	Canda L330	\$197.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
8/29/2020	SAM	Conferred with Mike Wakshull re forensic issues; prepared file memo re [REDACTED]	1.00 395.00/hr	Canda L130	\$395.00
8/30/2020	SAM	Reviewed correspondence from [REDACTED] re [REDACTED] [REDACTED] reviewed correspondence from and prepared correspondence to B. Bayless re same.	0.60 395.00/hr	Canda L190	\$237.00
8/31/2020	MT	Updated litigation index re proposed order granting motion to vacate; conferred with [REDACTED] re [REDACTED] [REDACTED] prepared notice of deposition for same; prepared correspondence to Naegeli Trial and Deposition re court reporter; reviewed and organized litigation files.	1.50 129.50/hr	Canda L190	\$194.25
	ACD	Reviewed, downloaded, and organized the probate court instruments.	2.00 129.50/hr	Litiga L190	\$259.00
	SAM	Finalized the notice of deposition for C. Curtis; reviewed correspondence from the California court reporting firm re same; reviewed multiple correspondence from the parties re C. Curtis' refusal to appear for a deposition.	0.50 395.00/hr	Canda L330	\$197.50
	SAM	Conferred with [REDACTED] re [REDACTED] [REDACTED] reviewed the court's records re same; reviewed correspondence from and prepared correspondence to H. Lopez (court reporter) re additional hearing transcripts.	0.50 395.00/hr	Litiga L190	\$197.50
	SAM	Reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] [REDACTED] conferred with [REDACTED] re [REDACTED] [REDACTED] reviewed correspondence from [REDACTED] re [REDACTED]	0.50 395.00/hr	Litiga L190	\$197.50
9/1/2020	MT	Updated litigation index re notice of intent to take the deposition of C. Curtis; reviewed and prepared docket matters re same.	0.30 129.50/hr	Canda L210	\$38.85

		<u>Hrs/Rate</u>		<u>Amount</u>
9/3/2020 MT	Updated litigation index re notice of setting for exparte motion for relief; reviewed and prepared docket matters re same.	0.30 129.50/hr	Canda L190	\$38.85
SAM	Prepared correspondence to [REDACTED] re [REDACTED] [REDACTED]	0.20 395.00/hr	Canda L330	\$79.00
SAM	Reviewed correspondence from the federal court re the Rule 60 hearing; prepared correspondence to N. Spielman re same; prepared correspondence to the parties re same.	0.50 395.00/hr	Canda L230	\$197.50
9/4/2020 SAM	Conferred with [REDACTED] re [REDACTED] [REDACTED] prepared file memo re [REDACTED]	0.50 395.00/hr	Carl L240	\$197.50
9/5/2020 SAM	Reviewed authorities re [REDACTED] prepared the response to Carl Brunsting's motion for summary judgment.	7.00 395.00/hr	Carl L240	\$2,765.00
9/6/2020 SAM	Reviewed authorities re [REDACTED] prepared the response to Carl Brunsting's motion for summary judgment.	8.00 395.00/hr	Carl L240	\$3,160.00
9/7/2020 EJW	Reviewed and revised response to motion for summary judgment.	0.70 250.00/hr	Carl L240	\$175.00
SAM	Reviewed authorities re [REDACTED] prepared the response to Carl Brunsting's motion for summary judgment; prepared multiple correspondence to and reviewed multiple correspondence from [REDACTED] re [REDACTED] [REDACTED] prepared correspondence to [REDACTED] re [REDACTED]	8.00 395.00/hr	Carl L240	\$3,160.00
9/8/2020 EJW	Conferred with [REDACTED] re [REDACTED] [REDACTED]	0.20 250.00/hr	Carl L120	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>	
9/8/2020	SAM	Reviewed authorities re [REDACTED] prepared the response to Carl Brunsting's motion for summary judgment; reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] conferred with [REDACTED] re [REDACTED] conferred with [REDACTED] re [REDACTED] conferred with [REDACTED] re [REDACTED] conferred with Greg Lester re business records affidavit; reviewed the C. Kunz-Freed deposition; reviewed the accounting records.	9.50 395.00/hr	Carl L240	\$3,752.50
9/9/2020	EJW	Conferred with [REDACTED] re [REDACTED] [REDACTED] reviewed file re temporary administrator's report and supplement to temporary administrator's report.	1.00 250.00/hr	Carl L120	\$250.00
	EJW	Reviewed and revised response to Carl's motion for summary judgment; prepared correspondence to and reviewed correspondence from [REDACTED] re [REDACTED] conferred with [REDACTED] re [REDACTED] prepared affidavit of A. Brunsting.	0.70 250.00/hr	Carl L240	\$175.00
	ACD	Reviewed, downloaded, and organized the probate court instruments.	1.50 129.50/hr	Litiga L190	\$194.25
	SAM	Reviewed authorities re [REDACTED] prepared the response to Carl Brunsting's motion for summary judgment; reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] conferred with [REDACTED] re [REDACTED] prepared multiple correspondence to [REDACTED] re [REDACTED] reviewed correspondence from and prepared correspondence to [REDACTED] re same; prepared Anita Brunsting's unsworn declaration.	11.30 395.00/hr	Carl L240	\$4,463.50
9/10/2020	EJW	Finalized business records affidavit and business records declaration for G. Lester; prepared correspondence to G. Lester re same; conferred with G. Lester re same; reviewed correspondence	3.40 250.00/hr	Carl L240	\$850.00

		<u>Hrs/Rate</u>		<u>Amount</u>
	from G. Lester re same; reviewed and revised declaration re Anita Brunsting; revised footnotes and organized exhibits to response to Carl's motion for summary judgment.			
9/10/2020 MT	Prepared and filed request for transcript; prepared correspondence to court reporter re same; reviewed court's docket re hearings.	0.70 129.50/hr	Canda L210	\$90.65
ACD	Reviewed, downloaded, and organized the probate court instruments.	1.50 129.50/hr	Litiga L190	\$194.25
MT	Reviewed, revised, and finalized response to Carl Brunsting's motion for summary judgment; prepared exhibits re same; conferred with [REDACTED] and [REDACTED] re [REDACTED]	2.00 129.50/hr	Carl L240	\$259.00
SAM	Reviewed authorities re [REDACTED] prepared the response to Carl Brunsting's motion for summary judgment; reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] conferred with [REDACTED] re [REDACTED] conferred several times with [REDACTED] re [REDACTED] reviewed multiple correspondence from and prepared multiple correspondence to [REDACTED] re [REDACTED] reviewed, organized, and prepared exhibits to response; conferred several times with [REDACTED] re [REDACTED] prepared the business records affidavit for Greg Lester; prepared the summary judgment exhibits affidavit for S. Mendel; reviewed and organized the exhibits to the response to the motion for summary judgment.	13.00 395.00/hr	Carl L240	\$5,135.00
9/11/2020 MT	Updated litigation index re response to Carl Brunsting's motion for summary judgment with exhibits.	0.20 129.50/hr	Carl L210	NO CHARGE
SAM	Reviewed the authorities and response to Carl Brunsting's partial motion for summary judgment; organized the file and exhibits re same; conferred with the court reporter re prior transcripts;	1.80 395.00/hr	Carl L240	\$711.00

		<u>Hrs/Rate</u>		<u>Amount</u>
	prepared the draft order to deny Carl Brunsting's motion for summary judgment; prepared correspondence to and reviewed correspondence from [REDACTED] re [REDACTED]			
9/11/2020	ACD Reviewed, downloaded, and organized the probate court instruments.	1.50 129.50/hr	Litiga L190	\$194.25
9/14/2020	MT Prepared correspondence to K. Metzger re transcript fee.	0.30 129.50/hr	Litiga L330	NO CHARGE
9/15/2020	SAM Reviewed and updated the accounting; conferred with [REDACTED] re [REDACTED] prepared correspondence to the parties re same.	2.50 395.00/hr	Trust L150	\$987.50
	MT Prepared correspondence to parties re accounting for May 2020; conferred with [REDACTED] re [REDACTED] prepared bank statements for production.	0.40 129.50/hr	Trust L150	\$51.80
	ACD Prepared May 2020 accounting; conferred with [REDACTED] re [REDACTED]	0.80 129.50/hr	Trust L150	\$103.60
	SAM Conferred with Carole Brunsting re Carl Brunsting's motion for summary judgment; prepared correspondence to [REDACTED] re [REDACTED]	1.00 395.00/hr	Carl L240	\$395.00
9/16/2020	MT Reviewed correspondence from [REDACTED] re [REDACTED] updated file memo re same; conferred with [REDACTED] re [REDACTED] and [REDACTED]	0.40 129.50/hr	Trust L150	\$51.80
	ACD Reviewed and organized the financial statements; prepared correspondence to the parties re the June 2020 accounting.	0.70 129.50/hr	Canda L150	\$90.65
	SAM Reviewed the file re further trust accounting work; revised the correspondence to the parties re the June 2020 accounting.	0.50 395.00/hr	Trust L150	\$197.50

			<u>Hrs/Rate</u>		<u>Amount</u>
9/17/2020	ACD	Prepared correspondence to the parties re the July and August 2020 accounting.	1.00 129.50/hr	Canda L150	\$129.50
	MT	Prepared bank statements for production; conferred with [REDACTED] re [REDACTED] reviewed and finalized correspondence re accounting.	0.50 129.50/hr	Trust L150	\$64.75
	EJW	Conferred with [REDACTED] re [REDACTED]	0.30 250.00/hr	Carl L250	NO CHARGE
	SAM	Reviewed authorities re [REDACTED] [REDACTED] prepared the co-trustees first supplemental answer.	2.00 395.00/hr	Carl L210	\$790.00
	EJW	Reviewed and revised supplemental answer.	0.50 250.00/hr	Carl L250	\$125.00
9/18/2020	MT	Updated litigation index re co-trustee's first supplemental answer,	0.10 129.50/hr	Carl L210	NO CHARGE
	SAM	Reviewed and revised the June, July, and August 2020 accountings.	0.50 395.00/hr	Trust L150	\$197.50
	SAM	Conferred with [REDACTED] re [REDACTED]	0.30 395.00/hr	Carl L240	\$118.50
9/19/2020	SAM	Reviewed correspondence from C. Curtis and B. Bayless re funds allocated for the mediation of the case; reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED] reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED]	0.50 395.00/hr	Trust L150	\$197.50
9/23/2020	SAM	Reviewed correspondence from and prepared correspondence to C. Reed re C. Curtis' deposition; reviewed correspondence from and prepared correspondence to [REDACTED] re [REDACTED]	0.20 395.00/hr	Canda L330	\$79.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
9/23/2020	SAM	Reviewed correspondence from the parties re accounting issues on the mediation; prepared a draft response re same; prepared correspondence to [REDACTED] re [REDACTED]	0.40 395.00/hr	Trust L150	\$158.00
9/24/2020	SAM	Prepared for C. Curtis' deposition; reviewed correspondence from [REDACTED] re [REDACTED]; reviewed correspondence from C. Curtis re same; conferred with [REDACTED] re [REDACTED] prepared file memo re [REDACTED] conferred with [REDACTED] re [REDACTED] prepared correspondence to C. Schwager re same; reviewed correspondence from Judge Comstock re same; prepared correspondence to Carole Brunsting re same; reviewed correspondence from the probate court reporter re hearing transcripts.	3.70 395.00/hr	Canda L330	\$1,461.50
	ACD	Prepared file memo re [REDACTED]	0.70 129.50/hr	Canda L320	\$90.65
	SAM	Prepared correspondence to the parties accounting issues and confirming that no trust funds were used for the mediation.	1.20 395.00/hr	Trust L150	\$474.00
9/25/2020	SAM	Reviewed correspondence from Anita Brunsting and Amy Brunsting re deposition issues; conferred with N. Spielman re deposition and objection issues; prepared correspondence to C. Schwager re same.	0.90 395.00/hr	Canda L330	\$355.50
	MT	Updated litigation index re Carl's reply to C. Kunz-Freed's response to motion for summary judgment.	0.10 129.50/hr	Carl L210	NO CHARGE
9/28/2020	SAM	Reviewed C. Curtis brief re the QBD trust; prepared response to same; prepared correspondence to N. Spielman re same; filed and served the co-trustees response to C. Curtis' QBD brief.	1.80 395.00/hr	Canda L240	\$711.00

		<u>Hrs/Rate</u>		<u>Amount</u>
9/28/2020 MT	Updated litigation index re C. Curtis' motion to quash, memo re QBD, and reply to first supplemental answer; prepared objection to memo re QBD; conferred with [REDACTED] re [REDACTED]	0.70 129.50/hr	Canda L250	\$90.65
ML	Prepared correspondence to H. Lopez re transcript payment.	0.20 129.50/hr	Litiga L190	NO CHARGE
SAM	Prepared for and attended Zoom hearing re C. Curtis' motion to quash the deposition; prepared proposed orders re same; conferred with and prepared correspondence to [REDACTED] prepared file memo re [REDACTED] prepared correspondence to the court reporter re transcription of the record.	2.70 395.00/hr	Canda L230	\$1,066.50
SAM	Conferred several times with Naegli court reporters re the deposition and/or certificate of nonappearance of C. Curtis; prepared multiple correspondence to and reviewed multiple correspondence from Naegli court reporters re same.	0.50 395.00/hr	Canda L330	\$197.50
9/29/2020 SAM	Prepared the objections to Carole Brunsting's summary judgment affidavit; prepared multiple correspondence to and reviewed multiple correspondence from [REDACTED] re [REDACTED] filed and served same.	3.70 395.00/hr	Carl L240	\$1,461.50
SAM	Reviewed correspondence from and prepared correspondence to probate court reporter re the hearing transcript; prepared correspondence to [REDACTED] re [REDACTED]	0.40 395.00/hr	Canda L330	\$158.00
9/30/2020 MT	Updated litigation index re order following telephonic conference and order re ex parte motion for relief.	0.20 129.50/hr	Canda L250	\$25.90

		<u>Hrs/Rate</u>		<u>Amount</u>	
9/30/2020	MT	Updated litigation index re objections to affidavit of Carole Brunsting re motion for summary judgment and co-trustee's first supplemental motion to transfer and/or vacate.	0.30 129.50/hr	Trust L250	\$38.85
	SAM	Reviewed the federal court orders that denied the Rule 60 motion for ex parte relief; reviewed the supplemental motion to transfer the district court foreign judgment lawsuit to the probate court; reviewed correspondence from and prepared correspondence to ██████████ reviewed the file re reviewed authorities re prepared correspondence to re	2.50 395.00/hr	Canda L240	\$987.50
	SAM	Conferred several times with Naegeli USA re the C. Curtis certificate of nonappearance; prepared multiple correspondence to and reviewed multiple correspondence from re prepared the exhibits for same; prepared correspondence to all the parties re same.	1.00 395.00/hr	Canda L330	\$395.00
10/1/2020	SAM	Conferred with Carole Brunsting re settlement.	0.50 395.00/hr	Litiga L160	\$197.50
10/2/2020	MT	Updated litigation index re proposed order sustaining objection to C. Kunz-Freed's motion for summary judgment evidence and proposed order sustaining plaintiff's objections to defendant's motion for summary judgment evidence.	0.20 129.50/hr	Carl L210	NO CHARGE
	SAM	Prepared correspondence to re settlement conversation with	0.30 395.00/hr	Litiga L160	\$118.50
10/3/2020	SAM	Reviewed correspondence from Carole Brunsting re settlement; prepared correspondence to re	0.30 395.00/hr	Litiga L160	\$118.50

		<u>Hrs/Rate</u>		<u>Amount</u>	
10/3/2020	SAM	Reviewed correspondence from and prepared correspondence to M. Wakshall re forensic expert issues.	0.30 395.00/hr	Canda L130	\$118.50
10/4/2020	SAM	Reviewed correspondence from and prepared correspondence to M. Wakshall re forensic issues.	0.20 395.00/hr	Canda L130	\$79.00
10/5/2020	SAM	Reviewed correspondence from C. Curtis re settlement and litigation issues; reviewed correspondence from prepared correspondence to re reviewed correspondence from the parties re same; conferred with re prepared correspondence to Carole Brunsting re same; reviewed the pleadings re whether to amend or supplement.	1.30 395.00/hr	Canda L190	\$513.50
10/6/2020	SAM	Reviewed correspondence from Carole Brunsting re settlement; prepared correspondence to and reviewed correspondence from re prepared correspondence to re	0.30 395.00/hr	Litiga L160	\$118.50
10/20/2020	ML	Prepared correspondence to Naegeli re payment for deposition of C. Curtis.	0.20 129.50/hr	Canda L190	NO CHARGE
	SAM	Prepared correspondence to re reviewed correspondence from re	0.50 395.00/hr	Litiga L160	\$197.50
10/22/2020	SAM	Reviewed multiple correspondence from Carole Brunsting re settlement issues.	0.30 395.00/hr	Litiga L160	\$118.50
10/23/2020	SAM	Reviewed notice of appeal by C. Curtis re the federal case; prepared correspondence to the parties re same; conferred with re	0.80 395.00/hr	Canda L510	\$316.00

		<u>Hrs/Rate</u>		<u>Amount</u>
10/23/2020 MT	Updated litigation index re notice of appeal.	0.10 129.50/hr	Canda L210	NO CHARGE
10/24/2020 SAM	Prepared correspondence to [REDACTED] [REDACTED]	0.50 395.00/hr	Litiga L160	\$197.50
10/26/2020 SAM	Conferred with [REDACTED] [REDACTED] prepared correspondence to [REDACTED] [REDACTED]	0.50 395.00/hr	Litiga L160	\$197.50
11/1/2020 SAM	Reviewed the settlement offer from Candace Curtis; reviewed correspondence from B. Bayless re same.	0.50 395.00/hr	Canda L160	\$197.50
11/2/2020 SAM	Reviewed correspondence from Carole Brunsting re the settlement offer from Candace Curtis; conferred with [REDACTED] prepared correspondence to [REDACTED] prepared a draft settlement agreement for Carole Brunsting.	0.80 395.00/hr	Litiga L160	\$316.00
11/3/2020 SAM	Prepared correspondence to Carole Brunsting re settlement of the case.	0.30 395.00/hr	Litiga L160	\$118.50
11/5/2020 SAM	Conferred with [REDACTED]	0.60 395.00/hr	Canda L120	\$237.00
11/6/2020 SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re settlement offers.	0.10 395.00/hr	Litiga L160	NO CHARGE
11/9/2020 SAM	Reviewed correspondence from and prepared correspondence to Carole Brunsting re settlement.	0.20 395.00/hr	Litiga L160	\$79.00
11/11/2020 SAM	Reviewed correspondence from B. Bayless re settlement; prepared draft correspondence to [REDACTED] [REDACTED] conferred with [REDACTED] [REDACTED] conferred with B. Bayless re same; prepared correspondence to B. Bayless re deferral of the ruling on the motion for summary judgment.	1.30 395.00/hr	Litiga L160	\$513.50

		<u>Hrs/Rate</u>		<u>Amount</u>
11/11/2020	SAM Reviewed C. Curtis' pro se request for the appellate record; prepared correspondence to C. Schwager re same.	0.30 395.00/hr	Canda L510	\$118.50
11/15/2020	SAM Reviewed correspondence from and prepared correspondence to Carole Brunsting re settlement; prepared correspondence to re	0.60 395.00/hr	Litiga L160	\$237.00
11/24/2020	SAM Prepared multiple correspondence to and reviewed multiple correspondence from R. Ridders re Iowa tax issues; prepared the draft of a settlement agreement for the parties; prepared correspondence to N. Spielman re same; conferred with N. Spielman re same.	1.20 395.00/hr	Litiga L160	\$474.00
	SAM Reviewed the file re Iowa Farm tax issues; prepared multiple correspondence to and reviewed multiple correspondence from R. Ridders re tax issues.	0.50 395.00/hr	Trust L150	\$197.50
11/25/2020	SAM Reviewed and revised the settlement agreement; conferred with prepared correspondence to prepared correspondence to B. Bayless re same; prepared correspondence to B. Bayless and Carole Brunsting re same; conferred twice with reviewed correspondence from	2.50 395.00/hr	Litiga L160	\$987.50
11/30/2020	SAM Reviewed correspondence from and prepared correspondence to B. Bayless re settlement; reviewed correspondence from and prepared correspondence to Carole Brunsting re same.	0.50 395.00/hr	Litiga L160	\$197.50
12/1/2020	SAM Prepared correspondence to B. Bayless re settlement; prepared correspondence to Carole Brunsting re same; prepared correspondence to	0.40 395.00/hr	Litiga L160	\$158.00

		<u>Hrs/Rate</u>		<u>Amount</u>	
12/2/2020	SAM	Reviewed correspondence from Carl Brunsting re settlement of the case; prepared correspondence to	0.30 395.00/hr	Carl L160	\$118.50
	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Litiga L120	\$118.50
12/3/2020	SAM	Reviewed correspondence from reviewed authorities re same; prepared correspondence to	1.30 395.00/hr	Litiga L120	\$513.50
12/4/2020	SAM	Reviewed correspondence from the 5th Circuit re the appellate record and briefing issues; reviewed the court's file re same; reviewed correspondence from and prepared correspondence to	0.80 395.00/hr	Canda L510	\$316.00
	SAM	Prepared correspondence to and reviewed correspondence from reviewed correspondence from and prepared correspondence to B. Bayless re settlement issues.	0.50 395.00/hr	Carl L160	\$197.50
12/5/2020	SAM	Reviewed the 5th Circuit file re appellate issues.	0.30 395.00/hr	Canda L510	\$118.50
12/6/2020	SAM	Reviewed correspondence from and prepared correspondence to N. Spielman re summary judgment issues as to C. Curtis.	0.30 395.00/hr	Canda L240	\$118.50
	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Carl L240	\$118.50

			<u>Hrs/Rate</u>		<u>Amount</u>
12/7/2020	SAM	Conferred several times with M. Tubbs re appellate file and eFile requirements.	0.30 395.00/hr	Canda L510	\$118.50
	SAM	Reviewed correspondence from and prepared correspondence to the court re settlement status; reviewed correspondence from B. Bayless re same; reviewed correspondence from	0.20 395.00/hr	Carl L160	\$79.00
	MT	Conferred with S. Mendel re work assignments.	0.30 129.50/hr	Canda L210	NO CHARGE
12/9/2020	SAM	Reviewed the 5th Circuit's electronic docket report and evaluated next steps.	0.30 395.00/hr	Canda L510	\$118.50
12/10/2020	MT	Prepared and filed notice of appearance for 5th Circuit.	0.50 129.50/hr	Canda L210	\$64.75
	SAM	Reviewed multiple correspondence from C. Schwager and N. Brunsting re Judge Hoyt's orders and appellate issues; reviewed the file re same; prepared correspondence to reviewed the 5th Circuit's briefing rules and schedule.	1.50 395.00/hr	Canda L510	\$592.50
	SAM	Prepared the outline of the response brief.	1.00 395.00/hr	Canda L520	\$395.00
12/18/2020	SAM	Reviewed correspondence from the 5th Circuit re Candace Curtis' appeal.	0.20 395.00/hr	Canda L510	\$79.00
12/20/2020	SAM	Prepared correspondence to the Fifth Circuit re counsel of record for Anita Brunsting and Amy Brunsting.	0.30 395.00/hr	Canda L510	\$118.50
12/28/2020	SAM	Revised the motion for partial summary judgment re tortious interference; reviewed authorities re same; prepared correspondence to	0.80 395.00/hr	Carl L240	\$316.00

			<u>Hrs/Rate</u>		<u>Amount</u>
12/31/2020	SAM	Reviewed correspondence from the 5th Circuit re C. Schwager's probated suspension, Pro Se status of C. Curtis, and revised briefing schedule; reviewed the state court records for the underlying facts; prepared correspondence to	1.20 395.00/hr	Canda L510	\$474.00
	SAM	Reviewed correspondence from N. Spielman re partial summary judgment on the tortious interference issue; reviewed the file re same.	0.50 395.00/hr	Canda L240	\$197.50
1/4/2021	SAM	Conferred with reviewed correspondence from reviewed the file	0.60 395.00/hr	Litiga L120	\$237.00
1/5/2021	SAM	Reviewed the file re accounting to prepare and produce.	0.40 395.00/hr	Trust L150	\$158.00
1/6/2021	SAM	Reviewed correspondence from prepared correspondence to and reviewed correspondence from	0.50 395.00/hr	Litiga L160	\$197.50
1/7/2021	SAM	Reviewed the file re accounting and tax issues; reviewed correspondence from and prepared correspondence to	0.80 395.00/hr	Trust L150	\$316.00
1/11/2021	MT	Conferred with A. Daniels re production of account statements.	0.20 129.50/hr	Trust L150	NO CHARGE
	ACD	Prepared the September and October 2020 accounting; prepared correspondences to the parties re same.	1.40 129.50/hr	Trust L150	\$181.30
1/12/2021	MT	Updated litigation index re record of appeal; reviewed same.	0.30 129.50/hr	Canda L190	\$38.85

			<u>Hrs/Rate</u>		<u>Amount</u>
1/12/2021	SAM	Prepared for and met with prepared correspondence to and reviewed correspondence from	1.50 395.00/hr	Litiga L160	\$592.50
1/13/2021	MT	Reviewed and organized electronic record of appeal.	0.50 129.50/hr	Canda L210	\$64.75
	SAM	Prepared for and attended conference call with prepared file memo re same; conferred with	1.50 395.00/hr	Litiga L160	\$592.50
	SAM	Reviewed the accounting records; reviewed and organized same; reviewed the deed history re tax issues; reviewed the file and authorities re step-up in basis issues.	2.30 395.00/hr	Trust L150	\$908.50
	ACD	Prepared correspondence to the parties re November 2020 accounting.	0.80 129.50/hr	Trust L150	\$103.60
1/14/2021	ACD	Prepared correspondence to the parties re December 2020 accounting.	0.80 129.50/hr	Trust L150	\$103.60
	SAM	Reviewed correspondence from and prepared correspondence to prepared spreadsheet prepared correspondence to Rich Ridders	1.30 395.00/hr	Trust L150	\$513.50
1/15/2021	ACD	Reviewed and revised multiple correspondence to the parties re September, October, November, and December 2020 accountings.	0.80 129.50/hr	Trust L150	\$103.60
1/18/2021	ACD	Conferred with S. Mendel re accounting work assignment.	0.10 129.50/hr	Trust L190	NO CHARGE
	SAM	Reviewed correspondence from Rich Ridders re tax issues for the farm; reviewed the file re same.	0.30 395.00/hr	Trust L150	\$118.50

			<u>Hrs/Rate</u>		<u>Amount</u>
1/20/2021	SAM	Reviewed the accountings to be produced for the months of September, October, November, and December 2020; prepared correspondence to and reviewed correspondence from prepared correspondence to	0.80 395.00/hr	Trust L150	\$316.00
	ACD	Reviewed and revised the accounting correspondence to the parties re September, October, November, and December 2020 accountings; conferred with S. Mendel re same.	1.00 129.50/hr	Trust L150	\$129.50
1/21/2021	ACD	Revised the accounting correspondence to the parties re September, October, November, and December 2020 accountings.	0.80 129.50/hr	Trust L150	\$103.60
	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Litiga L150	\$118.50
	SAM	Reviewed correspondence from R. Ridders re tax issues; reviewed the file and authorities re same.	0.30 395.00/hr	Trust L150	\$118.50
1/25/2021	ACD	Conferred with S. Mendel re accounting work assignments; finalized correspondence to the parties re September, October, November, and December 2020 accountings.	0.40 129.50/hr	Trust L150	\$51.80
	SAM	Reviewed the trust accountings for the time period September 2020 through December 2020; prepared correspondence to the parties re same.	0.40 395.00/hr	Trust L150	\$158.00
1/30/2021	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Trust L150	\$118.50
2/2/2021	ACD	Conferred with S. Mendel re farm tax proposal.	0.10 129.50/hr	Trust L190	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
2/3/2021	SAM	Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Trust L150	NO CHARGE
2/7/2021	SAM	Reviewed the file re sale of the farm and tax issues re same; prepared correspondence to	0.80 395.00/hr	Trust L150	\$316.00
2/9/2021	ACD	Reviewed C. Curtis federal filings; conferred with S. Mendel re same.	0.20 129.50/hr	Canda L190	\$25.90
	SAM	Reviewed and revised the settlement proposal; conferred with prepared correspondence to	0.30 395.00/hr	Litiga L160	\$118.50
	SAM	Reviewed correspondence from the 5th Circuit re C. Curtis' federal court brief; prepared correspondence to the 5th Circuit re same.	0.30 395.00/hr	Litiga L510	\$118.50
2/10/2021	MT	Updated litigation index re appellant's brief and correspondence from court re same; reviewed and prepared docket matters re deadline for appellee's brief.	0.30 129.50/hr	Canda L210	\$38.85
	ACD	Reviewed C. Curtis federal filing.	0.20 129.50/hr	Canda L190	NO CHARGE
2/11/2021	SAM	Reviewed correspondence from Anita Brunsting and N. Spielman re settlement; updated the file memo re details for the settlement offer.	0.30 395.00/hr	Litiga L160	\$118.50
2/26/2021	SAM	Reviewed multiple correspondence from conferred with	0.50 395.00/hr	Litiga L160	\$197.50
2/27/2021	SAM	Prepared correspondence to and reviewed correspondence	0.30 395.00/hr	Litiga L340	\$118.50

			<u>Hrs/Rate</u>		<u>Amount</u>
3/1/2021	SAM	Reviewed correspondence from N. Spielman re settlement issues; prepared correspondence to	0.30 395.00/hr	Litiga L160	\$118.50
	SAM	Reviewed correspondence from re settlement and 5th Circuit briefing issues; prepared correspondence to conferred with M. Ly re the allocation of fees and expenses for settlement purposes.	0.30 395.00/hr	Litiga L160	\$118.50
	ACD	Conferred with S. Mendel re scheduling.	0.10 129.50/hr	Litiga L190	NO CHARGE
3/2/2021	SAM	Reviewed and revised the prepared summary prepared correspondence to the	1.00 395.00/hr	Litiga L160	\$395.00
3/3/2021	ML	Prepared	0.60 129.50/hr	Litiga L150	\$77.70
3/4/2021	ML	Prepared conferred with S. Mendel re same.	1.20 129.50/hr	Litiga L150	\$155.40
3/5/2021	SAM	Reviewed and revised the settlement proposal; prepared multiple correspondence to and reviewed multiple correspondence from conferred with reviewed correspondence from reviewed correspondence from Candace Curtis	2.00 395.00/hr	Litiga L160	\$790.00
	ACD	Conferred with S. Mendel re proposed settlement agreement correspondence; conferred with M. Tubbs and S. Mendel re extension of filing date.	0.20 129.50/hr	Litiga L190	NO CHARGE

			<u>Hrs/Rate</u>		<u>Amount</u>
3/7/2021	SAM	Reviewed the file and authorities re appellate issues to brief.	1.00 395.00/hr	Canda L520	\$395.00
3/8/2021	MT	Prepared motion for extension of time to file brief; reviewed file memo re same.	0.60 129.50/hr	Canda L210	\$77.70
	ACD	Conferred with S. Mendel re case status.	0.10 129.50/hr	Litiga L190	NO CHARGE
3/9/2021	SAM	Prepared the motion for extension of time; reviewed authorities re same; reviewed the plaintiff's brief and record documents re same; conferred with	1.50 395.00/hr	Canda L510	\$592.50
	EJW	Reviewed and revised motion for extension of time to file appellees' brief; conferred with	0.40 295.00/hr	Trust L520	\$118.00
3/10/2021	MT	Finalized and filed motion for extension of time to file appellee's brief; conferred with S. Mendel re same; updated litigation index re same and order granting extension; reviewed and prepared docket matters re extension deadline.	0.50 129.50/hr	Canda L210	\$64.75
3/11/2021	SAM	Reviewed correspondence from and prepared correspondence to N. Spielman re appellate issues.	0.20 395.00/hr	Canda L520	\$79.00
3/15/2021	ACD	Conferred with S. Mendel re work assignments.	0.20 129.50/hr	Litiga L190	NO CHARGE
3/19/2021	ACD	Conferred with S. Mendel re case status update.	0.10 129.50/hr	Litiga L190	NO CHARGE
3/20/2021	SAM	Prepared briefing materials for prepared multiple correspondence to conferred with	1.00 395.00/hr	Canda L520	\$395.00
	SAM	Conferred with prepared multiple correspondence to	0.80 395.00/hr	Canda L520	\$316.00

			<u>Hrs/Rate</u>		<u>Amount</u>
3/23/2021	SAM	Reviewed correspondence from prepared correspondence to	0.20 395.00/hr	Canda L160	\$79.00
3/24/2021	SAM	Reviewed the multiple settlement proposals; attended the settlement conference call	1.30 395.00/hr	Litiga L160	\$513.50
	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L520	\$118.50
3/25/2021	ACD	Reviewed Brunsting family settlement agreement.	0.20 129.50/hr	Litiga L190	\$25.90
3/26/2021	ACD	Reviewed correspondence from conferred with	0.20 129.50/hr	Litiga L190	NO CHARGE
	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to reviewed and revised the settlement proposal; prepared correspondence to	1.00 395.00/hr	Litiga L160	\$395.00
3/28/2021	SAM	Reviewed authorities re appellate issues.	0.50 395.00/hr	Litiga L520	\$197.50
3/29/2021	SAM	Reviewed correspondence from	0.20 395.00/hr	Litiga L160	\$79.00
	SAM	Reviewed the file re briefing issues.	0.50 395.00/hr	Canda L520	\$197.50
3/30/2021	SAM	Reviewed correspondence from C. Curtis re settlement; prepared correspondence to the client team re same; reviewed multiple correspondence from and prepared correspondence to N. Spielman re same; reviewed multiple correspondence from	0.80 395.00/hr	Canda L160	\$316.00

			<u>Hrs/Rate</u>		<u>Amount</u>
the parties re settlement; conferred with					
3/31/2021	SAM	Conferred with	0.30 395.00/hr	Litiga L160	\$118.50
4/3/2021	SAM	Reviewed correspondence from C. Curtis, B. Bayless, and Carole Brunsting re rejection of the settlement proposal.	0.50 395.00/hr	Litiga L160	\$197.50
4/5/2021	ACD	Conferred with S. Mendel re scheduling.	0.20 129.50/hr	Litiga L190	NO CHARGE
4/6/2021	ACD	Conferred with S. Mendel re briefing schedule.	0.20 129.50/hr	Litiga L190	NO CHARGE
	SAM	Conferred several times with reviewed and revised the brief.	0.50 395.00/hr	Canda L520	\$197.50
4/8/2021	EJW	Reviewed and revised appellate brief; conferred with A. Daniels re work assignments; reviewed, finalized, and filed motion to extend time to file brief; conferred with	0.80 295.00/hr	Canda L520	\$236.00
	ACD	Reviewed brief; prepared same; conferred with	0.50 129.50/hr	Canda L320	\$64.75
	SAM	Conferred with reviewed and revised the motion for extension of time; prepared correspondence to and reviewed correspondence from C. Curtis re same.	1.50 395.00/hr	Canda L510	\$592.50
	SAM	Reviewed the appellate brief; conferred with conferred with	1.00 395.00/hr	Canda L520	\$395.00
4/9/2021	ACD	Conferred multiple times with the Federal Appellants Court re motion to extend status; conferred with	0.30 129.50/hr	Canda L190	\$38.85

			<u>Hrs/Rate</u>		<u>Amount</u>
4/12/2021	SAM	Reviewed correspondence from Carole Brunsting re conflicts issues raised by Judge Hoyt; reviewed the file re same; prepared correspondence to Carole Brunsting re same.	0.30 395.00/hr	Litiga L190	\$118.50
4/17/2021	SAM	Reviewed and revised the statement of acts for the appellate brief; reviewed the appellate records re details for same.	1.00 395.00/hr	Canda L520	\$395.00
4/18/2021	SAM	Reviewed and revised the entire appellate brief; reviewed record citations for the court appendix; reviewed authorities; conferred with conferred with correspondence to correspondence to correspondence to	6.00 395.00/hr	Canda L520	\$2,370.00
4/19/2021	SAM	Reviewed and revised the entire appellate brief; reviewed record citations for the court appendix; reviewed authorities; conferred with conferred with correspondence to correspondence to correspondence from	10.00 395.00/hr	Canda L520	\$3,950.00
	ACD	Prepared table of authorities re appellate brief; reviewed same; conferred with S. Mendel re same.	2.60 129.50/hr	Litiga L320	\$336.70
4/20/2021	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to the reviewed correspondence from the Fifth Circuit re the supplemental record excerpts.	1.00 395.00/hr	Canda L520	\$395.00
	ACD	Reviewed correspondence from the Federal court re brief instructions; conferred with S. Mendel re same.	0.20 129.50/hr	Litiga L190	\$25.90
4/28/2021	RMM	Conferred with court re scheduling jury trial date.	0.20 129.50/hr	Litiga L190	\$25.90

			<u>Hrs/Rate</u>		<u>Amount</u>
4/28/2021	ACD	Conferred with S. Mendel re potential jury trial dates.	0.10 129.50/hr	Litiga L190	NO CHARGE
4/29/2021	ACD	Reviewed appellant's reply brief; conferred with S. Mendel re same.	0.30 129.50/hr	Litiga L190	\$38.85
4/30/2021	SAM	Prepared correspondence to the court re trial settings; prepared correspondence to the parties re same.	0.30 395.00/hr	Litiga L430	\$118.50
	ACD	Conferred with S. Mendel re Federal brief appendix issues.	0.10 129.50/hr	Litiga L190	NO CHARGE
5/1/2021	SAM	Reviewed the supplemental record excerpts to be amended.	0.70 395.00/hr	Canda L520	\$276.50
5/2/2021	SAM	Prepared the co-trustees first amended supplemental record excerpts; filed and served same.	4.00 395.00/hr	Canda L520	\$1,580.00
5/6/2021	ACD	Reviewed and organized client documents.	0.10 129.50/hr	Trust L190	NO CHARGE
5/9/2021	SAM	Reviewed correspondence from and prepared correspondence to the trial court re trial settings.	0.20 395.00/hr	Litiga L230	\$79.00
5/10/2021	SAM	Reviewed correspondence from and prepared correspondence to Carole Brunsting re trial setting issues; prepared correspondence to the court re same; reviewed correspondence from B. Bayless re same.	0.60 395.00/hr	Litiga L250	\$237.00
5/17/2021	ACD	Conferred with S. Mendel re proposed scheduling.	0.10 129.50/hr	Litiga L190	NO CHARGE
5/19/2021	SAM	Reviewed correspondence from and prepared correspondence to Carole Brunsting re settlement.	0.20 395.00/hr	Litiga L160	\$79.00
5/24/2021	ACD	Attended May 24 hearing re trial setting; conferred with S. Mendel re same.	0.30 129.50/hr	Litiga L190	\$38.85

			<u>Hrs/Rate</u>		<u>Amount</u>
5/25/2021	SAM	Prepared for and attended the settlement conference call with reviewed the file re issues related to same.	1.50 395.00/hr	Litiga L160	\$592.50
	ACD	Conferred extensively with S. Mendel re trial setting status conference.	0.30 129.50/hr	Litiga L190	NO CHARGE
5/26/2021	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to	0.50 395.00/hr	Litiga L160	\$197.50
5/27/2021	ACD	Conferred with S. Mendel re motion for summary judgment draft.	0.20 129.50/hr	Litiga L190	NO CHARGE
5/30/2021	SAM	Reviewed and revised the joint docket control order; prepared correspondence to	0.50 395.00/hr	Litiga L230	\$197.50
5/31/2021	SAM	Reviewed and revised the co-trustees motion for summary judgment against Candace Curtis.	0.50 395.00/hr	Canda L240	\$197.50
6/1/2021	SAM	Reviewed and revised the co-trustees motion for summary judgment against Carl Brunsting.	0.30 395.00/hr	Carl L240	\$118.50
	SAM	Reviewed and revised the co-trustees motion for summary judgment against Candace Curtis.	0.30 395.00/hr	Canda L240	\$118.50
	SAM	Reviewed correspondence from B. Bayless re the docket control order.	0.40 395.00/hr	Litiga L250	\$158.00
6/3/2021	SAM	Reviewed correspondence from the parties re the proposed docket control order; prepared correspondence to C. Schwager and Carole Brunsting re same.	0.30 395.00/hr	Litiga L250	\$118.50
6/4/2021	SAM	Reviewed multiple correspondence from and prepared correspondence to Carole Brunsting re the proposed docket control order; reviewed correspondence from N. Spielman re same; finalized the proposed docket control order; eFiled	1.50 395.00/hr	Litiga L250	\$592.50

			<u>Hrs/Rate</u>		<u>Amount</u>
		and eServed same; prepared correspondence to the court and the parties re same.			
6/4/2021	SAM	Conferred with prepared correspondence to B. Bayless	0.80 395.00/hr	Litiga L160	\$316.00
6/7/2021	SAM	Prepared the formal statutory accounting; conferred with	1.50 395.00/hr	Trust L150	\$592.50
	SAM	Reviewed correspondence from B. Bayless re settlement; reviewed correspondence from and prepared correspondence to prepared correspondence to	0.50 395.00/hr	Litiga L160	\$197.50
	ACD	Reviewed client file re accountings; reviewed and organized same; conferred with S. Mendel re Quickbook formatting for Trial exhibits.	0.60 129.50/hr	Litiga L190	\$77.70
6/8/2021	SAM	Prepared the file re accounting issues; conferred with	0.50 395.00/hr	Trust L150	\$197.50
	VH	Prepared final accounting; conferred with	2.50 95.00/hr	Trust L150	\$237.50
6/9/2021	VH	Prepared final accounting.	3.00 95.00/hr	Trust L150	\$285.00
6/10/2021	VH	Prepared final accounting; conferred with	5.00 95.00/hr	Trust L150	\$475.00
6/11/2021	VH	Prepared final accounting; conferred with	0.50 95.00/hr	Trust L150	\$47.50
	SAM	Reviewed the revised docket control order; prepared multiple correspondence to reviewed correspondence from and prepared correspondence to B. Bayless re same; reviewed correspondence from and prepared	0.50 395.00/hr	Litiga L250	\$197.50

			<u>Hrs/Rate</u>		<u>Amount</u>
		correspondence to Anita Brunsting re C. Curtis hate mail.			
6/11/2021	ACD	Reviewed correspondence from C. Curtis; conferred with S. Mendel re same.	0.20 129.50/hr	Canda L190	NO CHARGE
6/14/2021	VH	Prepared final accounting.	4.00 95.00/hr	Trust L150	\$380.00
6/17/2021	VH	Prepared final accounting.	2.00 95.00/hr	Trust L150	\$190.00
6/18/2021	VH	Prepared final accounting.	4.00 95.00/hr	Trust L150	\$380.00
6/21/2021	VH	Prepared final accounting.	3.00 95.00/hr	Trust L150	\$285.00
	ACD	Reviewed 5th Circuit opinion; reviewed and organized client documents re same.	0.30 129.50/hr	Litiga L190	\$38.85
6/22/2021	VH	Prepared final accounting.	3.00 95.00/hr	Trust L150	\$285.00
6/23/2021	VH	Prepared final accounting.	3.00 95.00/hr	Trust L150	\$285.00
6/24/2021	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to	0.50 395.00/hr	Litiga L160	\$197.50
	VH	Prepared final accounting.	1.00 95.00/hr	Trust L150	\$95.00
	ACD	Conferred with S. Mendel re 5th circuit opinion and scheduling.	0.10 129.50/hr	Litiga L190	NO CHARGE
6/25/2021	VH	Prepared final accounting.	1.00 95.00/hr	Trust L150	\$95.00

			<u>Hrs/Rate</u>		<u>Amount</u>
6/28/2021	VH	Prepared final accounting.	2.50 95.00/hr	Trust L150	\$237.50
6/29/2021	VH	Prepared final accounting.	1.00 95.00/hr	Trust L150	\$95.00
	SAM	Prepared for and attended the settlement conference call with	1.00 395.00/hr	Litiga L160	\$395.00
6/30/2021	SAM	Reviewed multiple correspondence from prepared correspondence to	0.30 395.00/hr	Litiga L120	\$118.50
	SAM	Reviewed the file re the semi-annual accounting; prepared correspondence to	0.30 395.00/hr	Trust L150	\$118.50
	VH	Prepared final accounting.	2.00 95.00/hr	Trust L150	\$190.00
7/1/2021	SAM	Reviewed the updated accounting; conferred with reviewed correspondence from the Iowa Revenue Department re tax issues; prepared correspondence to	0.60 395.00/hr	Trust L150	\$237.00
7/5/2021	SAM	Reviewed multiple correspondence and files from reviewed the records reviewed the updated accounting being prepared.	1.00 395.00/hr	Trust L120	\$395.00
7/6/2021	VH	Prepared final accounting.	3.00 95.00/hr	Trust L150	\$285.00
	SAM	Reviewed the records for the January through June 2021 semi-annual accounting; conferred with A. Daniels re same.	0.50 395.00/hr	Trust L150	\$197.50

			<u>Hrs/Rate</u>		<u>Amount</u>
7/6/2021	SAM	Prepared for and attended the strategy and case status call with	1.00 395.00/hr	Litiga L120	\$395.00
	ACD	Prepared January, February, March, April, May, and June accountings; conferred with S. Mendel re same.	2.00 129.50/hr	Trust L150	\$259.00
7/8/2021	EJW	Reviewed C. Curtis bill of review in C.A. 412249-404; reviewed co-trustees' answer; conferred with S. Mendel re same.	1.50 295.00/hr	Canda L120	\$442.50
	ACD	Conferred with E. Wyatt re summary judgement status.	0.10 129.50/hr	Litiga L190	NO CHARGE
7/9/2021	SAM	Reviewed and revised the semi-annual accounting; conferred with ; reviewed same.	1.00 395.00/hr	Trust L150	\$395.00
	SAM	Reviewed the bill of review; conferred with E. Wyatt re same; reviewed authorities re same; conferred with B. Bayless re same.	1.50 395.00/hr	Canda L210	\$592.50
	ACD	Reviewed accounting correspondences; prepared multiple correspondences to Brunsting parties re trust accountings.	0.50 129.50/hr	Trust L150	\$64.75
	EJW	Conferred with S. Mendel re amended answer; reviewed authorities re same.	0.50 295.00/hr	Canda L250	\$147.50
7/13/2021	EJW	Reviewed US Court of Appeals opinion and judgment; updated litigation index re same.	0.30 295.00/hr	Canda L140	\$88.50
	ACD	Reviewed C. Brunsting's brief in response to bill of review; conferred with S. Mendel re same.	0.20 129.50/hr	Litiga L190	\$25.90
7/14/2021	EJW	Conferred with reviewed authorities re drop order.	0.60 295.00/hr	Canda L120	\$177.00

			<u>Hrs/Rate</u>		<u>Amount</u>
7/14/2021	SAM	Prepared the response to Curtis' bill of review.	2.00 395.00/hr	Canda L240	\$790.00
	ACD	Conferred with E. Wyatt and S. Mendel re response to bill of review.	0.20 129.50/hr	Litiga L190	NO CHARGE
7/15/2021	SAM	Prepared the response to Curtis' bill of review.	1.20 395.00/hr	Canda L240	\$474.00
	EJW	Reviewed Carl's response to bill of review; revised Anita's amended answer.	0.60 295.00/hr	Canda L120	\$177.00
	ACD	Conferred with S. Mendel re response to bill of review; reviewed C. Curtis response to bill of review.	0.30 129.50/hr	Litiga L190	\$38.85
7/16/2021	SAM	Prepared the co-trustees response to C. Curtis' bill of review.	2.00 395.00/hr	Canda L240	\$790.00
7/17/2021	SAM	Reviewed the bill of review, responses, and reply briefs; reviewed authorities re same; organized same; prepared the proposed final judgment.	1.20 395.00/hr	Canda L240	\$474.00
	SAM	Conferred with _____ re trust administration and accounting issues; reviewed the file re same.	0.60 395.00/hr	Trust L150	\$237.00
7/19/2021	SAM	Reviewed the file re pending dispositive motions, responses, replies, and sur-replies re the bill of review.	0.40 395.00/hr	Canda L240	\$158.00
	EJW	Conferred with K. Olah re work assignments for Brunsting bill of review filings.	0.20 295.00/hr	Canda L190	NO CHARGE
7/21/2021	VH	Prepare final accounting.	2.50 95.00/hr	Trust L150	\$237.50
	SAM	Conferred several times with _____ re accounting issues; conferred with _____ re same; reviewed correspondence from and prepared	1.50 395.00/hr	Trust L150	\$592.50

			<u>Hrs/Rate</u>		<u>Amount</u>
	correspondence	re same; prepared			
	correspondence	re same.			
7/22/2021	SAM	Reviewed the trust accounting.	0.50 395.00/hr	Trust L150	\$197.50
	VH	Prepare final accounting.	1.00 95.00/hr	Trust L150	\$95.00
7/23/2021	VH	Prepare final accounting.	2.00 95.00/hr	Trust L150	\$190.00
7/24/2021	SAM	Reviewed the accounting update.	0.30 395.00/hr	Trust L150	\$118.50
7/28/2021	VH	Prepare final accounting.	2.00 95.00/hr	Trust L150	\$190.00
	SAM	Reviewed correspondence re the updated accounting; conferred several times with re same; conferred with A. Daniels re same; reviewed and revised same; conferred with re same.	1.30 395.00/hr	Trust L150	\$513.50
	ACD	Prepared accounting re conferred with V. Heitmann and S. Mendel re same.	1.60 129.50/hr	Litiga L150	\$207.20
8/3/2021	EJW	Conferred with S. Mendel re case status and work assignments.	0.20 295.00/hr	Trust L120	NO CHARGE
8/8/2021	SAM	Reviewed the file re motion for summary judgment issues; prepared correspondence to re same.	0.50 395.00/hr	Canda L240	\$197.50
10/5/2021	EJW	Conferred with R. Rosinski re motion for summary judgment.	0.20 295.00/hr	Trust L120	NO CHARGE
10/6/2021	RR	Reviewed file re outstanding issues; updated file memo.	0.10 129.50/hr	Litiga L120	NO CHARGE

		<u>Hrs/Rate</u>		<u>Amount</u>	
10/15/2021	RR	Reviewed plaintiff's answers to Anita, Amy, and C. Brunsting; conferred with E. Wyatt re same; reviewed C. Curtis's response to Anita and Amy Brunsting's original counterclaim.	0.30 129.50/hr	Canda L210	\$38.85
10/19/2021	RR	Reviewed motion for summary judgment.	0.20 129.50/hr	Canda L240	\$25.90
	EJW	Conferred with S. Mendel re case status and C. Curtis' recent filings.	0.10 295.00/hr	Canda L120	NO CHARGE
11/3/2021	SAM	Reviewed and revised the co-trustees motion for summary judgment; reviewed authorities re same; reviewed multiple correspondence from and prepared multiple correspondence to re same.	1.00 395.00/hr	Canda L240	\$395.00
	ACD	Prepared correspondence to A. Brunsting re November 4 hearing.	0.10 129.50/hr	Litiga L190	NO CHARGE
11/4/2021	RR	Attended Zoom hearing with S. Mendel re status conference; prepared memo re same.	0.50 129.50/hr	Litiga L230	\$64.75
11/5/2021	RR	Reviewed and revised motion for summary judgment; conferred with re same.	1.60 129.50/hr	Litiga L240	\$207.20
11/9/2021	SAM	Conferred with re settlement alternatives; reviewed correspondence from re same; reviewed correspondence from B. Bayless re same.	0.50 395.00/hr	Litiga L160	\$197.50
11/11/2021	RR	Reviewed file re outstanding issues; updated file memo.	0.10 129.50/hr	Litiga L120	NO CHARGE
11/24/2021	SAM	Prepared for and conferred with B. Bayless re settlement; prepared correspondence to and reviewed correspondence from re same.	1.50 395.00/hr	Litiga L160	\$592.50

			<u>Hrs/Rate</u>		<u>Amount</u>
11/27/2021	SAM	Reviewed the file and settlement notes with B. Bayless; prepared correspondence to re settlement and severance of the case.	1.40 395.00/hr	Litiga L160	\$553.00
11/30/2021	SAM	Conferred with re severance and settlement issues; conferred with re same.	1.00 395.00/hr	Carl L120	\$395.00
12/1/2021	SAM	Reviewed correspondence from re the motion for summary judgment and severance negotiations reviewed correspondence from re same; prepared for and conferred with B. Bayless re the summary judgments and severance issues.	1.00 395.00/hr	Carl L240	\$395.00
12/3/2021	SAM	Prepared the rule 11 agreement of Cart Brunsting, Anita Brunsting, and Amy Brunsting; prepared correspondence to B. Bayless and N. Spielman re same; prepared correspondence to re same.	1.00 395.00/hr	Carl L190	\$395.00
12/8/2021	SAM	Reviewed correspondence from and prepared correspondence to N. Spielman re the reply to C. Curtis' response to the co-trustees motion for summary judgment.	0.20 395.00/hr	Canda L240	\$79.00
12/9/2021	SAM	Reviewed C. Curtis' response to the co-trustees motion for summary judgment and motion to strike; conferred with re same; reviewed and revised the co-trustees' response to same; prepared the objections to Curtis' exhibit to her response.	2.50 395.00/hr	Canda L240	\$987.50
	VMD	Created Word Doc and Table	0.40 129.50/hr	Canda L240	\$51.80
12/13/2021	RR	Reviewed co-trustee's reply to motion for summary judgment and motion to strike.	0.20 129.50/hr	Canda L240	\$25.90

			<u>Hrs/Rate</u>		<u>Amount</u>
12/21/2021	SAM	Reviewed correspondence from re the motion to sever; reviewed correspondence from B. Bayless ; prepared correspondence to re same.	0.30 395.00/hr	Carl L250	\$118.50
1/4/2022	SAM	Reviewed Carole Brunsting's motion for partial distribution; conferred with N. Spielman re same; reviewed correspondence from and prepared correspondence to B. Bayless re same; prepared correspondence to re same.	1.00 395.00/hr	Litiga L250	\$395.00
	EJW	Reviewed correspondence from the court re zoom hearing on January 6; conferred with S. Mendel re same; reviewed notice of hearing and C. Brunsting's motion for emergency relief.	0.40 295.00/hr	Litiga L120	\$118.00
1/5/2022	SAM	Prepared motion to sever.	0.60 395.00/hr	Carl L250	\$237.00
	EJW	Revised motion to sever; conferred with re same; conferred with re same; conferred with B. Bayless re same.	0.80 295.00/hr	Litiga L250	\$236.00
	SAM	Reviewed Carole Brunsting's motion for \$100k distribution; reviewed multiple correspondence from and prepared multiple correspondence to re same.	0.60 395.00/hr	Trust L250	\$237.00
1/6/2022	RR	Filed motion to sever and proposed order re C. Brunsting; conferred with re same and hearing.	1.00 129.50/hr	Litiga L250	\$129.50
	SAM	Reviewed and revised the motion to sever.	0.50 395.00/hr	Carl L250	\$197.50
	SAM	Reviewed multiple correspondence from the client team re Carole Brunsting's motion for \$100k distribution; prepared for and attended the hearing re same.	1.20 395.00/hr	Trust L250	\$474.00

			<u>Hrs/Rate</u>		<u>Amount</u>
1/7/2022	RR	Prepared multiple correspondence to and reviewed multiple correspondence from co-counsel re hearing dates.	0.30 129.50/hr	Litiga L230	\$38.85
	RR	Prepared notice of hearing; filed same.	0.30 129.50/hr	Litiga L250	\$38.85
	EJW	Reviewed correspondence from the court re hearing; prepared and filed notice re same;	0.30 295.00/hr	Canda L190	\$88.50
1/10/2022	SAM	Reviewed multiple correspondence from and prepared multiple correspondence re the court's \$100k distribution order for Carole Brunsting.	1.00 395.00/hr	Trust L120	\$395.00
1/12/2022	EJW	Conferred with S. Mendel re emergency hearing re Carole Brunsting expense request.	0.20 295.00/hr	Litiga L120	\$59.00
1/13/2022	SAM	Reviewed correspondence from B. Bayless re trial preparation deadlines.	0.20 395.00/hr	Litiga L440	\$79.00
1/14/2022	RR	Reviewed file re outstanding issues; updated file memo.	0.10 129.50/hr	Litiga L190	\$12.95
1/15/2022	SAM	Prepared correspondence to B. Bayless anmd N. Spielman re trial preparation deadlines.	0.20 395.00/hr	Litiga L440	\$79.00
1/17/2022	SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re docket control order issues.	0.20 395.00/hr	Litiga L250	\$79.00
1/18/2022	SAM	Prepared correspondence to N. Spielman re B. Bayless and docket control order issues.	0.20 395.00/hr	Litiga L250	\$79.00
1/20/2022	SAM	Conferred with J.C. Michael re the Iowa easement issue.	0.20 395.00/hr	Trust L190	\$79.00
1/21/2022	SAM	Prepared correspondence to J.C. Michael re the Iowa easement issue; prepared correspondence to re same.	0.20 395.00/hr	Trust L190	\$79.00

			<u>Hrs/Rate</u>		<u>Amount</u>
1/27/2022	RR	Conferred with e tortious interference by C. Curtis.	0.20 129.50/hr	Canda L190	\$25.90
	RR	Updated litigation calendar re docket control order.	0.30 129.50/hr	Litiga L190	\$38.85
1/28/2022	RR	Prepared exhibits.	0.50 129.50/hr	Canda L190	\$64.75
1/31/2022	RR	Conferred with S. Mendel re Iowa farm, accounting, and rule 11 agreement.	0.20 129.50/hr	Trust L150	\$25.90
	SAM	Prepared a Rule 11 agreement re the docket control order and severance issues.	0.30 395.00/hr	Litiga L250	\$118.50
2/1/2022	SAM	Reviewed and revised the July - December 2021 accountings; prepared correspondence to the parties re same.	0.50 395.00/hr	Trust L150	\$197.50
	SAM	Reviewed correspondence from and prepared correspondence to B. Bayless re the Rule 11 agreement re the docket control order and severance issues.	0.20 395.00/hr	Litiga L250	\$79.00
	KSM	Reviewed multiple correspondence from re production of accounting records for the July - December 2021 accounting update; reviewed and organized same; prepared correspondence to the parties re same.	6.00 129.50/hr	Trust L150	\$777.00
	SAM	Reviewed the accounting records for the July - December 2021 accounting update; prepared correspondence to the parties re same on a month by month basis.	1.00 395.00/hr	Trust L150	\$395.00
2/3/2022	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to B. Bayless and N. Spielman re the Rule 11 agreement on the modified docket control order.	0.50 395.00/hr	Trust L150	\$197.50

			<u>Hrs/Rate</u>		<u>Amount</u>
2/3/2022	RR	Conferred with S. Mendel and E. Wyatt re pretrial order and Iowa farm motion.	0.70 129.50/hr	Trust L250	\$90.65
	RR	Prepared motion re approval re Iowa farm.	0.80 129.50/hr	Trust L250	\$103.60
2/4/2022	SAM	Reviewed and reviewed the motion to approve the Iowa Farm water easement; prepared correspondence to N. Spielman re same.	1.00 395.00/hr	Trust L250	\$395.00
2/7/2022	RR	Reviewed C. Curtis response re motion to sever.	0.50 129.50/hr	Canda L250	\$64.75
	SAM	Reviewed C. Curtis' response to the motion for severance.	0.30 395.00/hr	Litiga L250	\$118.50
	RR	Conferred with S. Mendel re pretrial order.	0.20 129.50/hr	Litiga L440	\$25.90
2/8/2022	RR	Prepared pretrial order.	1.00 129.50/hr	Litiga L440	\$129.50
	SAM	Conferred with re settlement and the severance.	1.50 395.00/hr	Litiga L160	\$592.50
2/9/2022	RR	Reviewed and revised pretrial order; updated file memo re same.	1.50 129.50/hr	Litiga L440	\$194.25
	RR	Conferred with S. Mendel re pretrial order.	0.20 129.50/hr	Litiga L440	\$25.90
	SAM	Conferred with re severance issues and Carole Brunsting.	0.50 395.00/hr	Litiga L250	\$197.50
2/10/2022	SAM	Conferred with B. Bayless re trial related issues; prepared outlines re trial exhibits.	1.00 395.00/hr	Litiga L440	\$395.00
	RR	Conferred with S. Mendel re trial preparation, exhibits, and pleadings.	0.60 129.50/hr	Litiga L440	\$77.70

		<u>Hrs/Rate</u>		<u>Amount</u>
2/11/2022	RR	1.10 129.50/hr	Litiga L230	\$142.45
	SAM	3.00 395.00/hr	Canda L250	\$1,185.00
	SAM	1.00 395.00/hr	Trust L250	\$395.00
	EJW	0.50 295.00/hr	Canda L250	\$147.50
	RR	0.20 129.50/hr	Litiga L190	\$25.90
2/14/2022	RR	1.00 129.50/hr	Litiga L440	\$129.50
2/17/2022	RR	1.00 129.50/hr	Litiga L440	\$129.50
2/18/2022	RR	1.50 129.50/hr	Litiga L440	\$194.25
2/19/2022	RR	2.10 129.50/hr	Litiga L440	\$271.95
	SAM	4.00 395.00/hr	Canda L440	\$1,580.00

		<u>Hrs/Rate</u>		<u>Amount</u>
2/20/2022	SAM	6.80 395.00/hr	Litiga L440	\$2,686.00
Prepared the joint pretrial order; prepared correspondence to the parties re same; reviewed correspondence from and prepared correspondence to Carole Brunsting re same.				
2/21/2022	RR	3.00 129.50/hr	Litiga L440	\$388.50
Reviewed, revised, and filed pretrial order; conferred with S. Mendel re same.				
	SAM	7.00 395.00/hr	Litiga L440	\$2,765.00
Reviewed multiple correspondence from and prepared multiple correspondence to N. Spielman, B. Bayless, and Carole Brunsting re the pretrial order; conferred with N. Spielman re same; conferred with Carole Brunsting re same; reviewed and revised the joint pretrial order; prepared correspondence to Judge Comstock re same; reviewed proposed pretrial order of Candace Curtis, as prepared by Rik Munson.				
2/22/2022	VMD	0.20 129.50/hr	Litiga L120	\$25.90
Conferred with R. Rosinski re case and scheduling.				
	SAM	2.30 395.00/hr	Canda L440	\$908.50
Prepared the first amended joint pretrial order; conferred with re same; reviewed multiple correspondence among the parties and court re same.				
2/23/2022	SAM	3.00 395.00/hr	Canda L440	\$1,185.00
Prepared the first amended joint pretrial order; met with re same; reviewed correspondence from and prepared correspondence to Judge Comstock re the pretrial order.				
2/24/2022	RR	0.50 129.50/hr	Canda L440	\$64.75
Reviewed file re fee agreement and billing record requests.				
	SAM	1.00 395.00/hr	Canda L440	\$395.00
Reviewed and revised the joint pretrial order; conferred with E. Wyatt re same.				
	EJW	0.60 295.00/hr	Litiga L120	\$177.00
Conferred with S. Mendel several times re revisions to Brunsting pre-trial order				

		<u>Hrs/Rate</u>		<u>Amount</u>
2/24/2022	EJW	2.60 295.00/hr	Litiga L440	\$767.00
Revised Brunsting pre-trial order re C. Schwager's additions to same and B. Baules' revised jury questions; conferred with re pretrial hearing strategy..				
2/25/2022	RR	1.80 129.50/hr	Canda L230	\$233.10
Prepared for and attended Zoom hearing with S. Mendel re pretrial conference, motion to exclude, and motion for summary judgment; conferred with staff re same.				
	SAM	6.50 395.00/hr	Canda L440	\$2,567.50
Reviewed and revised the joint pretrial order; conferred several times with re same; prepared multiple correspondence to and reviewed multiple correspondence from the parties re same.				
	SAM	3.00 395.00/hr	Canda L230	\$1,185.00
Prepared for and attended the joint pretrial hearing and hearing on the motions for summary judgment and to excluded evidence; conferred with post-hearing re same; prepared correspondence to and reviewed correspondence from re same; conferred with				
2/26/2022	SAM	0.50 395.00/hr	Canda L240	\$197.50
Reviewed multiple correspondence from and prepared multiple correspondence to N. Spielman and B. Bayless re court's possible consolidation of subdockets; reviewed the file re same.				
	SAM	1.40 395.00/hr	Canda L120	\$553.00
Reviewed multiple correspondence from and prepared multiple correspondence to N. Spielman and B. Bayless re additional proceedings that affect the trial of the case; reviewed multiple correspondence from C. Schwager re same; reviewed the file re same.				
2/27/2022	SAM	1.50 395.00/hr	Canda L440	\$592.50
Reviewed multiple correspondence from and prepared multiple correspondence to B. Bayless re additional proceedings that affect the trial of the				

		<u>Hrs/Rate</u>		<u>Amount</u>
	case; prepared multiple correspondence to re same; prepared outline re trial issues.			
2/28/2022 RR	Reviewed discovery re supplementation needed for attorneys' fees trial.	1.50 129.50/hr	Litiga L310	\$194.25
	SAM Reviewed multiple correspondence from and prepared multiple correspondence to re pending matters post pretrial conference.	0.60 395.00/hr	Canda L120	\$237.00
	For professional services rendered	<u>591.80</u>		<u>\$164,958.05</u>
	Additional Charges :			
6/23/2020	Prepared mediation exhibit copies.			\$22.60
6/24/2020	Prepared mediation exhibit copies.			\$45.20
7/30/2020	Filing fees re response to Carl Brunsting's motion for summary judgment.			\$25.72
8/18/2020	Trial transcripts - Hipolita G. Lopez (court reporter).			\$409.49
9/10/2020	Filing fees re Defendants' & Co-Trustees' Joint Amended Response to Carl Brunsting's Motion for Partial Summary Judgment.			\$25.72
9/12/2020	Filing fees and copy fees for Brunsting federal court matters.			\$47.10
9/14/2020	Trial transcripts - Hipolita G. Lopez (court reporter) (original cost - \$799.50) / refunded check no. 282 for \$149.50.			\$650.00
	Trial transcripts - Katherine Metzger.			\$268.25
	Postage.			\$7.15
9/28/2020	Trial transcripts - Hipolita G. Lopez (court reporter).			\$120.00
	LSO.			\$21.79

	<u>Amount</u>
9/28/2020 Courier - LSO.	\$21.79
10/5/2020 Deposition transcript of Candace Curtis.	\$506.00
Certificate of non-appearance of Candace Curtis.	\$225.00
10/20/2020 Postage.	\$0.50
Copies within the Firm.	\$1.00
10/5/2021 Copies re co-trustees' motion for summary judgment.	\$6.60
10/13/2021 Telephone.	\$33.76
10/15/2021 Copies within the firm re plaintiff's answers to Anita and Amy Brunsting and C. Curtis's answers to Anita and Amy Brunsting's original counterclaim.	\$39.00
10/19/2021 Copies within the firm re motion for summary judgment.	\$6.60
11/5/2021 Copies within the Firm.	\$16.40
11/24/2021 Telephone - conference call.	\$8.84
11/30/2021 Telephone - conference call.	\$25.18
12/13/2021 Copies within the Firm.	\$3.80
1/6/2022 Filing fees re proposed order re C. Brunsting.	\$2.06
2/7/2022 Copies within the Firm re C. Curtis response to motion to sever.	\$4.00
2/8/2022 Trial transcripts - Hipolita G. Lopez inv. no. 220302.	\$72.33
2/21/2022 Filing fees re pretrial order.	\$2.06
2/24/2022 Copies regarding the joint pretrial order.	\$21.20
2/25/2022 Copies regarding the joint pretrial order.	\$42.40

Anita K. Brunsting

Page 59

Amount

2/28/2022 Copies within the Firm.

\$20.00

Total additional charges

\$2,701.54

Exhibit B

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

December 31, 2014

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
12/3/2014	NES	Telephone conference(s) with potential client further to representation and upcoming hearing on 12/09/2014	0.20	65.00
12/4/2014	NES	Preparation and drafting of proposed Engagement Agreement; preparation and drafting of memorandum to client regarding above	1.80	0.00
12/4/2014	NES	Review online records to obtain copy of pleadings related to upcoming hearing on 12/09/2014	0.60	195.00
12/5/2014	NES	Meeting with B. Featherstone, counsel for Anita Brunsting regarding case and overall strategy	0.30	97.50
12/8/2014	NES	Multiple memoranda to and from client including review of additional pleadings and file materials (Carl's expert designations, Anita's response to Motion to Remove and Motion to Distribute Funds), communicate with client regarding communication with/from counsel for other parties no longer being appropriate, obtain and review Candace's Motion to Withdraw Funds, obtain and review Carole's objections to Candace's Motion to Withdraw Funds; multiple memoranda to and from counsel for Anita regarding strategies for upcoming hearings (12/09/2014); preparation and drafting of Notice of Appearance; preparation and drafting of Response to Carl's Motion to Remove Amy and Anita as Trustees; discussion with SSG regarding [REDACTED] Candace and Carl's Motions to Distribute Funds, [REDACTED] filed by counsel for Carole and Anita, [REDACTED]	6.20	2,015.00
12/9/2014	NES	Receipt and review of memorandum from Carole's counsel presenting copy of Carole's response to Carl's Motion to Distribute Funds; preparation and drafting of memorandum to client regarding same	0.30	97.50
12/9/2014	NES	Prepare for hearings, including telephone conference from Anita's counsel	1.20	390.00
12/9/2014	NES	Travel to and attend pre-hearing meeting with Anita's counsel and counsel for law firm defending separate lawsuit filed by Carl regarding the trust documents; attend hearing on Motions filed by Carl and Candace; post-hearing discussion with counsel for Carl and Candace	2.40	780.00
12/11/2014	NES	Multiple memoranda to and from counsel for parties regarding bonds in the amount of approximately \$3000 and disposition of same	0.60	195.00
12/12/2014	NES	Telephone conference(s) with B. Featherston regarding possible next	0.60	195.00

	steps		
	authority for Anita and Amy to directly discuss co-trustee responsibilities and related issues		
12/12/2014	NES Receipt and review of copy of memorandum to counsel for Carl and Candace addressing deficiencies in each others discovery responses and expert designations	0.10	32.50
12/15/2014	NES Review, analyze and outline pertinent documents, evolution of powers, rights, trustees, trusts, etc. in connection with understanding scope of dispute (including original Family Trust, Restated Family Trust, First Amendment to Family Trust, Qualified Beneficiary Designation(s), Appointment of Successor Trustees, Resignation of Trustee, Acceptance of Successor Trustee	5.40	1,755.00
12/16/2014	NES Further review and analysis of "live" pleadings filed by Candace and Carl relative to actions taken by Anita, Amy and Carole and contested by Candace and Carl, and in consideration of powers awarded to Anita (and Amy) in Trust documents	1.80	585.00
12/16/2014	NES Preparation and drafting of memorandum to counsel for Carl and Candace requesting additional information about Carl and Candace's claims against Amy	0.20	65.00
		Sub-total Fees:	<u>\$6,467.50</u>

Expenses

	Photocopies		40.97
12/9/2014	Harris County District Clerk		2.06
12/9/2014	Harris County District Clerk		2.06
12/9/2014	NES - Parking		7.00
		Sub-total Expenses:	<u>\$52.09</u>

Payments

12/31/2014	Payment	Trust Application	6,519.59
		Sub-total Payments:	<u>\$6,519.59</u>

Trust Account

		Beginning Balance:	0.00
12/11/2014			0.00
12/11/2014			10,000.00
12/31/2014	Trust Application		-6,519.59

Ending Balance: \$3,480.41

Total Current Billing: \$6,519.59

Previous Balance Due: \$0.00

Total Now Due: \$0.00

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

January 31, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount	
11/18/2014	NES	Extended telephone conference(s) with potential new client regarding potential representation in ongoing litigation involving mother's estate (and trusts); receipt and review of memorandum from potential client with narrative summary of facts/timeline; online review and copying of parties (apparent) live pleadings - both in state court probate action and federal counsel (subsequently dismissed or transferred to probate action); conference with SSG and SLG regarding same (n/c)	2.40	0.00
11/19/2014	NES	Telephone conference(s) with S. Mendel further to analysis of case and representation	0.90	292.50
11/20/2014	NES	Preparation and drafting of memorandum to client further to representation and upcoming hearing on 12/09/2014	0.30	97.50
1/5/2015	NES	Receipt and review of memorandum from Carl's counsel regarding efforts to obtain damage model data from expert	0.10	32.50
1/6/2015	NES	Receipt and review of memorandum from Attorney L. Walsh to B. Bayless regarding notice of proposed deposition dates for Carl Brunsting	0.20	65.00
1/6/2015	NES	Multiple memoranda to and from counsel regarding depositions - specifically, whether Carl and Candy are entitled to depose Carole, who was previously deposed	0.30	97.50
1/9/2015	NES	Receipt and review of correspondence from J. Ostrom offering availability for Candy Brunsting's deposition	0.20	65.00
1/12/2015	NES	Receipt and review of Candy's Response to Anita's Requests for Disclosure	0.20	65.00
1/13/2015	NES	Preparation and drafting of memorandum to all counsel regarding conflicts and availability for depositions during month of February	0.20	65.00
1/13/2015	NES	Preparation and drafting of status memorandum to client regarding deposition scheduling	0.10	32.50
1/13/2015	NES	Receipt and review of documents from Anita as part of ongoing supplementation of discovery requests	0.60	195.00
1/14/2015	NES	Receipt and review of response from client regarding issues addressed in memorandum of 1/13/2015; preparation and drafting of reply to client further to deposition issues, address questions raised by Candy's discovery responses (damages), advise as to intent to confer with	1.10	357.50

		Carole's attorney; telephone conference(s) with Carole's counsel - abatement, consolidation, mediation and bond issue; preparation and drafting of memorandum to client addressing bond issue as requested by Carole's counsel to conference call		
1/15/2015	NES	Receipt and review of response from client regarding bond issue and prepare reply; preparation and drafting of memorandum to Carole's counsel to advise that bonds addressed in recent discovery supplementation received from Anita are believed to be the same bonds that are at issue between Candy and Carole	0.30	97.50
1/20/2015	NES	Review discovery materials exchanged by parties prior to entering appearance on behalf of client; analyze and consider options for issuing discovery to Candy and Carl to possibly narrow scope of allegations against all defendants, generally and Amy specifically; preparation and drafting of follow-up memorandum to client following review and addressing Candy's damage model	2.40	780.00
1/21/2015	NES	Receipt and review of two memorandum from client addressing Candy's damage model and presenting additional information about dispute over bonds	0.30	97.50
1/27/2015	NES	Receipt and review of correspondence from J. Ostrom regarding trial continuance	0.20	65.00
1/27/2015	NES	Receipt and review of additional information from client regarding Candy's damage model	0.10	32.50
1/28/2015	NES	Receipt and review of Candy's Second Amended Petition	0.30	97.50
1/28/2015	NES	Preparation and drafting of follow-up memorandum to Carole's counsel further to recent discussion about bonds, addressing correspondence from Candy's attorney requesting continuance	0.10	32.50
1/29/2015	NES	Preparation and drafting of memorandum to client to present copy of Candy's Second Amended Petition and discuss correspondence received requesting reset of trial date	0.10	32.50

Sub-total Fees: \$2,600.00

Total Current Billing: \$2,600.00

Previous Balance Due: \$0.00

Total Now Due: \$2,600.00

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

February 28, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
2/4/2015	NES	Receipt and review of memorandum from Carole's attorney to group, advising as to opposition to Candy's request for agreed continuance	0.10	32.50
2/5/2015	NES	Preparation and drafting of memorandum to all counsel of record to confirm resolution of matter that prevented scheduling of depositions during weeks of 2/16/2015 and 2/23/2015	0.10	0.00
2/5/2015	NES	Extended telephone conference(s) with Anita's counsel regarding Carl's deposition having been taken in other lawsuit, discussing need to obtain copy of transcript/video, discussing implications of deposition (possible competency issues), discussing approach to Candy's requested continuance; conference with SSG regarding same (n/c)	0.80	260.00
2/5/2015	NES	Preparation and drafting of status update to client, including copy of Candy's Second Amended Petition	0.30	97.50
2/10/2015	NES	Receipt and review of Candace Curtis' Motion and Order for Continuance requesting a six month extension	0.30	97.50
2/10/2015	NES	Receipt and review of Notice of Filing Plaintiff's Original Petition into Probate Court by Candace Curtis	0.30	97.50
2/10/2015	NES	Receipt and review of Notice of Filing of Plaintiff's First Amended Petition filed by Candace Curtis	0.20	65.00
2/12/2015	NES	Receipt and review of Carole Brunsting's First Request for Disclosures to Amy Brunsting; receipt and review of Carole Brunsting's First Request for Disclosures to Candace Curtis; receipt and review of Carole Brunsting's First Request for Disclosures to Anita Brunsting; certificate of Written Discovery	0.40	130.00
2/16/2015	NES	Receipt and review of Plaintiff's Notice of Filing of Injunction and Report of Master	0.30	97.50
2/16/2015	NES	Receipt and review of Plaintiff's Application and Order for Partial Distribution	0.30	97.50
2/16/2015	NES	Receipt and review of memorandum from Carole's attorneys to Bobbie Bayless demanding the immediate resignation of Carl Brunsting as Executor in both estates by Friday, February 20, 2015	0.20	65.00
2/18/2015	NES	Receipt and review of Notice of Hearing for Plaintiff's Application for Partial Distribution and Motion for Continuance	0.20	0.00

2/18/2015	NES	Receipt and review of Notice of Substitution of Party filed by Carl Brunstling attempting to name Drina in Carl's place due to competency issues	0.30	97.50
2/18/2015	NES	Receipt and review of A. Brunstling's Response to Candace's Second Motion for Partial Distribution for Attorney's Fees	0.30	97.50
2/18/2015	NES	Receipt and review of J. Ostrom's Change of Firm Name and Address	0.20	0.00
2/18/2015	NES	Preparation and drafting of status report to client addressing various developments (Carl's deposition, Candy's continuance and application, Carl's competency issues, Candy's "new" lawsuit); prepare for hearing on Candy's Motion for Continuance and Application for Distribution; travel to and attend hearings Motion for Continuance (granted) and Application for Distribution (denied); and post-hearing meeting with counsel - per Court's instruction - to discuss and prepared Agreed Docket Control Order based on new trial setting; receipt and review of memorandum from client in response to earlier status report; preparation and drafting of reply to client to advise that Candy lost the hearing on the Application for Distribution	4.40	1,430.00
2/18/2015	NES	Receipt and review of Carole Brunstling's Objection to Plaintiff's Application for Partial Distribution	0.30	97.50
2/19/2015	NES	Estate of Elmer Brunstling - Receipt and review of Carl Brunstling's Application to resign as independent Executor and Candace Curtis' Application for Appointment as Successor personal representative	0.20	65.00
2/19/2015	NES	Receipt and review of Estate of Nelva Brunstling regarding Carl Brunstling's Application to Resign as Independent Executor and Candace Curtis' Application for Appointment as Successor Personal Representative	0.20	65.00
2/19/2015	NES	Receipt and review of executed Order granting trial Continuance	0.20	65.00
2/20/2015	NES	Receipt and review of Agreed Docket Control Order from Court; conference with SSG regarding same (n/c)	0.20	65.00
2/23/2015	NES	Telephone conference(s) with counsel for Anita regarding recent filings by Carl and Candy (documents from Carl naming Drina as agent/attorney-in-fact, documents from Carl and Candy addressing Carl's removal as executor, objection to Amy being named, effort to name Candy), discussion regarding best course of action and next steps - possible/contingent hearing of temporary independent executor at [REDACTED]	1.10	357.50
2/23/2015	NES	Preparation and drafting of memorandum to client outlining developments since hearing of 2.18.2015, discussing issues and options for next steps to be taken	0.40	130.00
2/24/2015	NES	Receipt and review of response from client regarding potential appointment as executor of estates	0.10	32.50
2/24/2015	NES	Preparation and drafting of memorandum to counsel for Carole to determine Carole's position regarding Amy's possible effort to be named executor of estates (prior to contacting counsel for Carl and Candy to [REDACTED])	0.20	65.00

2/25/2015	NES	Receipt and review of response from Carole's counsel regarding Carole's position on successor for Carl	0.20	65.00
2/25/2015	NES	Preparation and drafting of "settlement proposal" to counsel for Carl and Candy relating to Carl's removal/resignation as executor of Estates and selection of successor executor	0.40	130.00
2/26/2015	NES	Receipt and review of preliminary response from Carl's counsel regarding Executor proposal	0.10	32.50
2/26/2015	NES	Communicate with Carl's counsel regarding discovery and documents previously produced by Carl	0.20	65.00
2/26/2015	NES	Receipt and review of proposed Agreed Order of Consolidation (Candy's 402 case with Carl's 401 case); execute and return same; request update from counsel as to whether notice of status conference has been communicated to defense counsel in malpractice litigation as was discussed/requested by the Court	0.30	97.50
2/26/2015	NES	Telephone conference(s) with counsel for Anita regarding evaluation of Candy's damage model, discussing e-mails from Candy which may assist in Anita and Amy's defense, discussing options pertaining to evolving issue on successor executor; receipt and review of copy of 10/8/2010 e-mail from Candy to Anita, encouraging Anita to take over as Trustee	0.60	195.00
2/26/2015	NES	Receipt and review of supplemental document production from Anita (tax returns)	0.40	130.00
			Sub-total Fees:	<u>\$4,322.50</u>

Expenses

Photocopies	131.58
Sub-total Expenses:	<u>\$131.58</u>

Payments

12/31/2014	Payment	Trust Application	6,519.59
2/28/2015	Payment	Trust Application	3,480.41
Sub-total Payments:			<u>\$10,000.00</u>

Trust Account

2/28/2015	Trust Application	Beginning Balance:	3,480.41
			<u>-3,480.41</u>
		Ending Balance:	<u>\$0.00</u>

Total Current Billing:	<u>\$4,454.08</u>
Previous Balance Due:	\$2,600.00
Total Now Due:	<u>\$3,573.67</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

March 31, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
etal.

Professional Fees			Hours	Amount
3/3/2015	NES	Receipt and review of memorandum from D. Smith to B. Bayless requesting executed Statutory Durable Power of Attorney	0.20	65.00
3/3/2015	NES	Receipt and review of memorandum from Carl's attorney responding to demand from Carole's attorney, producing Power of Attorney and letter from physician purportedly supporting Carl's wife, Drina, taking over as agent-in-fact for Carl	0.20	65.00
3/3/2015	NES	Preparation and drafting of memorandum to client discussing Power of Attorney documents and related issues	0.10	32.50
3/6/2015	NES	Receipt and review of Agreed Order to Consolidate Cases filed with Court	0.10	32.50
3/9/2015	NES	Receipt and review of Anita's objection to Candy's appointment as personal representative of the Estates (of Elmer and Nelva), with multiple e-mails consisting of threats and rants to Amy, Anita and Carole	0.40	130.00
3/10/2015	NES	Analyze and confirm case law and related statutes to address various recognized basis for disqualifying applicant from serving as executor, relative to Carl and Candy's objection to Amy and Amy/Anita/Carole's objection to Candy; to confirm proper steps to be followed by Carl prior to Court's approval of resignation; preparation and drafting of draft of Amy's Application (to be named successor executor); Amy's Response (to Carl's removal as executor) and Amy's Objection (to Candy's application to be named successor executor); preparation and drafting of memorandum to counsel for Anita; preparation and drafting of memorandum to client addressing draft, review of same and plan for filing	5.20	1,690.00
3/11/2015	NES	Receipt and review of memorandum from client following review of draft Application; communicate with Anita's counsel regarding draft, discuss possible basis for arguing [REDACTED]; preparation and drafting of memorandum to client addressing above; revise and redraft Application as to father's estate, consistent with above; adapt and update prior Application/Response/Objection for use with respect to administration of mother's estate; receipt and review of memorandum and documents from Anita's counsel relating to Motion to Compel discovery responses from Carl and Candy	3.40	1,105.00
3/12/2015	NES	Receipt and review of A. Brunsting's Motion to Compel C. Brunsting and C. Curtis' responses to Requests for Disclosure and Notice of Hearing;	0.30	0.00

		docket same			
3/12/2015	NES	Preparation and drafting of Response to Carole Brunsting's Request for Disclosure (also as a supplement, update of response to previous requests for disclosure from other parties); receipt and review of memorandum from Carl's attorney regarding Motion to Compel filed by Anita's counsel; preparation and drafting of memorandum to counsel for Anita regarding potential counterclaims not yet raised in pleadings filed by Amy and Anita's original attorneys; preparation and drafting of Written Interrogatories to Candace, breaking down allegations from Second Amended Petition as a basis for Interrogatories	4.20		1,365.00
3/16/2015	NES	Receipt and review of Candace Curtis's Responses to Carole Brunsting's Requests for Disclosure	0.20		65.00
3/16/2015	NES	Receipt and review of Candace Curtis's First Amended Responses to Requests for Disclosure	0.30		97.50
3/16/2015	NES	Continue preparation of Interrogatories and Requests for Production to Candace; Initiate preparation of Interrogatories and Requests for Production to Carl, specifically addressing Carl's allegations as per most recently amended pleading	2.80		910.00
3/17/2015	NES	Receipt and review of Candace's Response to Objections to Application and Objection to Amy's Application	0.30		97.50
3/17/2015	NES	Telephone conference(s) with Anita's counsel regarding response filed by Candy, discussing options and strategies for presenting issues to Court during upcoming Status Conference	0.60		195.00
3/19/2015	NES	Receipt and review of Agreed Order to Consolidate Cases signed by the Judge	0.20		65.00
3/20/2015	NES	Analyze and consider case law cited by counsel for Candace in Objection to Amy's Application to be named Successor Executor, as well as competing case law - topics such as "suitability", "family discord" "executor qualifications/disqualifications" and related issues	2.60		845.00
3/23/2015	NES	Receipt and review of First Supplement to Plaintiff's First Amended Petition	0.30		97.50
3/23/2015	NES	Receipt and review of Drina Brunsting as attorney-in-fact for Carl Brunsting's Response to Anita Brunsting's Motion to Compel Carl Brunsting to Respond to Disclosures with Exhibits	0.30		97.50
3/23/2015	NES	Prepare for Status Conference --prepare outline of talking points on primary issues (possible transfer of district court case to probate court in light of areas of overlap Carl's removal as executor; competing applications to be named successor executor, objections to be named successor and response to Candace's cases supposedly supporting client's lack of qualifications to be named successor)	1.90		617.50
3/23/2015	NES	Travel to and attend Status Conference with Court (production of attorney's fee information from Carl and Candy; possible transfer of district court case; Carl's removal as executor, competing applications to be named successor execution and possible alternative solutions)	3.40		1,105.00
3/24/2015	NES	Preparation and drafting of memorandum to counsel for Vacek & Freed	0.10		32.50

3/12/2015	Harris County Clerk - Probate	2.06
3/12/2015	Harris County Clerk - Probate	4.12
Sub-total Expenses:		<u>\$31.89</u>

Payments

3/5/2015	Payment #1238	2,600.00
Sub-total Payments:		<u>\$2,600.00</u>

Total Current Billing:	<u>\$9,944.39</u>
Previous Balance Due:	\$973.67
Total Now Due:	<u>\$10,918.06</u>

Federal Tax ID # 76-0535052

		regarding issues discussed at Status Conference		
3/24/2015	NES	Telephone conference(s) with C. McCullough regarding events transpiring at Status Conference in light of possible appointment of McCullough to serve as temporary successor executor	0.70	227.50
3/24/2015	NES	Telephone conference(s) with B. Featherston regarding further consideration of Kathy Wiley, attorney suggested by other counsel at Status Conference, and additional work product ; decision to address issue and others following receipt of Court memorandum mentioned at Status Conference	0.60	195.00
3/25/2015	NES	Preparation and drafting of memorandum to all counsel to address order and scheduling of depositions, when proper time for doing so arrives; discussing Candace, Drina (and Carl, subject to competency) being the first to be deposed	0.10	32.50
3/25/2015	NES	Receipt and review of memorandum from B. Bayless (Carl & Drina) notifying Court of objection to K. Wiley as possible third party administrator; preparation and drafting of memorandum to B. Featherston and D. Smith (Carole) suggesting conference call as between three attorneys for Amy, Anita and Carole to discuss alternate named proposed by Bayless and their suitability to serve	0.20	65.00
3/25/2015	NES	Receipt and review of multiple additional communications from counsel regarding depositions	0.20	65.00
3/25/2015	NES	Telephone conference(s) with client to address matters discussed at Status Conference; receipt and review of memorandum from Judge Butts further to Status Conference; preparation and drafting of follow-up memorandum to client regarding same; abatement of efforts to prepare discovery to Carl in light of competency issues and courts comments at Status Conference	0.40	130.00
3/26/2015	NES	Telephone conference(s) with B. Featherston further to evaluation of e-mail from Judge Butts and next steps	0.40	130.00
3/30/2015	NES	Receipt and review of Notice of Substitution reflecting Candace Curtis's pro se representation; preparation and drafting of memorandum to client regarding Notice, confirm procedural rules pertaining to substitution and withdrawal, receipt and review of memorandum from client regarding evaluation of Notice	0.60	195.00
3/30/2015	NES	Telephone conference(s) with B. Featherston regarding Notice from Candace, Featherston's conversation with Ostrom, discussing plan and strategy for proceeding	0.30	97.50
3/30/2015	NES	Receipt and review of Motion and Order to Withdraw from Jason B. Ostrom	0.20	65.00

Sub-total Fees: \$9,912.50**Expenses**Photocopies 25.71

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

April 30, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
4/7/2015	NES	Preparation and drafting of memorandum to client addressing Order granting withdrawal and next steps	0.20	65.00
4/7/2015	NES	Receipt and review of memorandum from Associate Judge presenting executed Order of Withdrawal pertaining to Ostrum	0.10	32.50
4/9/2015	NES	Receipt and review of Plaintiff Candace Curtis's Motion to Show Authority pursuant to Rule 12	0.20	65.00
4/10/2015	NES	Telephone conference(s) with counsel for Anita regarding issues addressed in Motion to Show Authority	0.20	65.00
4/13/2015	NES	Receipt and review of memorandum from Candace Curtis presenting answers to Interrogatories and Request for Production, prepared by Rik Munson; analyze and consider procedural deficiencies in discovery responses, consider next steps for addressing issues raised by responses	1.20	390.00
4/20/2015	NES	Receipt and review of Affidavit of Fact from Candace Curtis (pertaining to Curtis's perception of facts pertaining to resignation of Carl and successor executor)	0.20	65.00
			Sub-total Fees:	<u>\$682.50</u>
			Total Current Billing:	<u>\$682.50</u>
			Previous Balance Due:	\$10,918.06
			Total Now Due:	<u>\$11,600.56</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

May 31, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
5/1/2015	NES	Receipt and review of Supplemental Production from counsel for Anita - payment to State of Iowa, Treasurer (state taxes)	0.10	32.50
5/5/2015	NES	Receipt and review of memorandum from counsel for Carl regarding discovery supplementation needed from Anita and Amy pertaining to 2014 tax returns	0.10	32.50
5/6/2015	NES	Review and analyze Requests for Production and Interrogatories issued by Candace to Anita and evaluate extent to which topics covered address time period in which Anita was sole trustee versus time period when Anita and Amy were/are co-trustees, begin process of determining how much coordination is necessary relative to co-trustee type questions and whether separate responses may be needed from Amy despite formal issuance of requests to Anita only	0.60	195.00
5/7/2015	NES	Receipt and review of memorandum from counsel for Carole regarding status of efforts to obtain third party administrator for Estate (in light of Carl's resignation)	0.10	32.50
5/12/2015	NES	Receipt and review of Candace Curtis' Written Interrogatories and Request for Production to Anita Brunsting	0.20	65.00
5/13/2015	NES	Telephone conference(s) with Anita's counsel regarding memorandum recently received from Carole's counsel, discuss possible coordination of efforts to respond to discovery requests issued to Anita (by Candace); discussing potential next steps (furtherance of successor executor issue, possible summary judgment pleadings); discussing upcoming deadlines on Carl/Drina per Court's order and benefits of waiting on receipt of materials from Carl/Drina prior to initiating any further next steps	0.30	97.50
5/14/2015	NES	Preparation and drafting of memorandum to Carole's attorney summarizing conversation with Anita's counsel and plan for moving forward	0.10	32.50
5/15/2015	NES	Receipt and review of Carl Brunsting's First Amended Responses to Defendants' Requests for Disclosure	0.30	97.50
5/18/2015	NES	Telephone conference(s) with counsel for Anita regarding his review and impression of discovery supplementation received from Carl; discussion regarding possible options for returning to mediation, filing summary judgment motions, resolving case with Carl Brunsting	0.40	130.00

		(b) (7)(C)), discussion of additional issues to be researched and considered in effort to determine next course of conduct for Amy and Anila		
5/19/2015	NES	Follow-up telephone conference(s) with Anita's counsel regarding counsel's recent discussion with Anita, discussing plan to proceed with IME for Carl to assist in determination of whether guardian is needed for Carl, discuss pursuing summary judgment on "undue influence" issue, discuss status of proceedings for appointment of independent successor executor	0.30	97.50
5/20/2015	NES	Preparation and drafting of memorandum to client providing update as to recent developments, seeking authority to proceed with plan, as determined through recent communications with Anita's counsel	0.60	195.00
5/28/2015	NES	Receipt and review of Defendants Motion for Traditional and No-Evidence Summary Judgment with Exhibits A-E (filed in District Court action against law firm)	0.30	97.50
5/28/2015	NES	Receipt and review of Notice of Hearing on Defendants' Motion for Traditional and No-Evidence Summary Judgment (filed in District Court action against law firm)	0.10	32.50
5/28/2015	NES	Receipt and review of Candace Curtis' Request for Production to Amy Brunsting	0.30	97.50
5/28/2015	NES	Receipt and review of Candace Curtis' Written Interrogatories to Amy Brunsting	0.20	65.00
5/28/2015	NES	Telephone conference(s) with B. Featherston further to recent development - law firm's filing of Motion for Summary Judgment in district court case and possible impact of same on pending Probate case, discovery requests received by Amy in comparison to similar requests previously received by Anita and options for responding to requests	0.30	97.50
5/28/2015	NES	Preparation and drafting of status memorandum to client regarding discovery requests and Motion for Summary Judgment in district court action	0.20	65.00
5/29/2015	NES	Review draft of proposed Motion for No Evidence Summary Judgment and prepare memorandum to Anita's counsel regarding possible edits to same; review memorandum from counsel regarding possible agreement from Carl's attorney regarding IME in lieu of Motion and hearing	0.60	195.00

Sub-total Fees: \$1,657.50

Expenses

Photocopies 15.30

Sub-total Expenses: \$15.30

Total Current Billing:	<u>\$1,672.80</u>
Previous Balance Due:	\$11,600.56
Total Now Due:	<u>\$13,273.36</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

June 30, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
6/1/2015	NES	Review draft of Anita Brunsting's proposed discovery responses to C. Curtis discovery requests and discuss proposed responses with Anita's counsel to insure consistency between Anita's responses and Amy's upcoming responses	0.60	195.00
6/4/2015	NES	Receipt and review of Anita's official responses to C. Curtis' discovery requests	0.30	97.50
6/11/2015	NES	Initiate preparation of objections to C. Curtis' interrogatories issued to Amy	0.80	260.00
6/12/2015	NES	Conference call with client to review discovery requests received from C. Curtis and discuss possible objections and responses to same	1.20	390.00
6/12/2015	NES	Receipt and review of memorandum from client with text of proposed answer to part of Interrogatory 10	0.10	32.50
6/15/2015	NES	Preparation and drafting of objections to all questions asked by C. Curtis in interrogatories issued to Amy Brunsting, prepare answers to first 25 questions asked, based upon information provided by client during conference call and subsequently	5.20	1,690.00
6/16/2015	NES	Receipt and review of extended memorandum from C. Curtis regarding her position as to duties of co-trustees, her request for an accounting, her allegations of a breach of injunction, her allegations of a loss of approximate \$6500 in value of trust assets associated with bonds, review of attachment to e-mail (10.8.2014 letter to C. Curtis pertaining to Series EE bonds)	0.40	130.00
6/18/2015	NES	Preparation and drafting of objections and responses to Requests for Production issued by C. Curtis, telephone conference(s) with Anita's counsel regarding Request No. 6 (2014 tax data) both as to the Request issued to Amy and the demand for same made by C. Curtis in her recent e-mail; preparation and drafting of memorandum to client presenting interrogatory answers for review, discussing verification procedure, discussing Request No. 6	1.20	390.00
6/18/2015	NES	Receipt and review of Stipulation; receipt and review of Order Dismissal Motion to Show Authority - representing agreements and documents exchanged by Carl and Candace relative to Drina serving as attorney-in-fact and Carl's capacity issues	0.40	130.00
6/24/2015	NES	Telephone conference(s) with Anita's counsel to determine status of	0.40	130.00

production of documents requested by C. Curtis, and finalize objections, answers and responses to Candace's discovery requests

6/25/2015	NES	Review revisions to Joint Motion for Summary Judgment prepared by Anita's counsel based on prior discussions regarding content of original draft; preparation and drafting of response to Anita's counsel with final thoughts regarding Motion and approving filing of same	0.30	97.50
6/30/2015	NES	Receipt and review of A. Brunsting's Supplemental Production with CD containing numerous messages and invoice	0.50	162.50

Sub-total Fees: \$3,705.00

Expenses

Photocopies	16.49
Postage	15.76

Sub-total Expenses: \$32.25

Payments

6/15/2015	Payment	#1408	200.00
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Sub-total Payments: \$200.00

Total Current Billing: \$3,737.25

Previous Balance Due: \$13,073.36

Total Now Due: \$16,810.61

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

July 31, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
7/1/2015	NES	Preparation and drafting of Designation of Expert Witnesses to allow for presentation and contradiction of parties' respective claims; for attorney's fees	0.60	195.00
7/1/2015	NES	Receipt and review of Carl Brunsting's First Amended Expert Witness Designation and Further Supplement to Carl's Responses to all Requests for Disclosure	0.30	97.50
7/1/2015	NES	Telephone conference(s) with Anita's counsel regarding conversation between Anita's counsel and Carole's counsel as to summary judgment to be filed addressing Carl and Candace's claims	0.40	130.00
7/1/2015	NES	Telephone conference(s) with Anita's counsel further to discussions regarding comments and suggested revisions to summary judgment motion and Anita's discovery responses	0.30	97.50
7/7/2015	NES	Receipt and review of Requests for Production from Carl Brunsting to Amy Brunsting, Anita Brunsting and Carole Brunsting; docket response to same	0.40	130.00
7/7/2015	NES	Receipt and review of Waiver of Notice and Notice of Deposition on Written Questions as to Edward Jones	0.30	97.50
7/13/2015	NES	Receipt and review of Plaintiff, D. Brunsting's Second Supplement to Plaintiff's First Amended Petition	0.30	97.50
7/13/2015	NES	Receipt and review of Plaintiff, D. Brunsting's Second Amended Responses to Requests for Disclosure	0.30	97.50
7/13/2015	NES	Receipt and review of e-filed Notice of Hearing on Brunsting's Joint No-Evidence Motion for Partial Summary Judgment; docket same	0.20	65.00
7/14/2015	NES	Receipt and review of Carl Brunsting's Notice of Hearing on his Motion for Partial Summary Judgment; docket same	0.30	97.50
7/14/2015	NES	Receipt and review of Carl Brunsting's Motion for Partial Summary Judgment with numerous Exhibits; docket response to same	0.60	195.00
7/14/2015	NES	Receipt and review of Carl Brunsting's Motion to Transfer Related District Court Case to Probate Court 4; receipt and review of Notice of Hearing placing Motion on the Court's hearing docket for July 21, 2015; docket same	0.40	130.00

7/15/2015	NES	Receipt and review of Plaintiff, Candace Curtis' Response to Defendants, Anita and Amy Brunsting's Motion for Partial Summary Judgment and Motion to Demand to Produce Evidence pursuant to Evidence Codes §1002, 1003	0.40	130.00
7/20/2015	NES	Telephone conference(s) with Carole's attorneys (A. Covey) regarding issues set to be considered at tomorrow's hearing, regarding Amy & Anita's Motion for Summary Judgment and regarding issues raised by Carl/Drina in their Motion for Summary Judgment	0.80	260.00
7/20/2015	NES	Receipt and review of Carl Brunsting's 11 page Motion for Protective Order (with numerous exhibits) and proposed Order	0.60	195.00
7/20/2015	NES	Telephone conference(s) with counsel for Vacek & Freed regarding Motion to Transfer and approval of motion for appointing defendant regarding the above motion , discussing Candace Curtis allegations of forged signature pages compared against Vacek & Freed's practice of having clients sign in triplicate	0.90	292.50
7/20/2015	NES	Telephone conference(s) with B. Featherston regarding strategy for hearing on Appointment of Successor Executor, discussing Motion for Summary Judgment filed by Carl, discussing recordings and e-mails forming the basis for Motion for Protection filed by Carl	0.70	227.50
7/20/2015	NES	Preparation and drafting of draft of proposed Order Appointing Successor Executor and memorandum to B. Featherston regarding requesting review and comment, approval of same on Anita's behalf	0.30	97.50
7/20/2015	NES	Further review of Restated Trust Agreement including issues pertaining to irrevocability, amendment, successor trustees, and qualified beneficiary designations in light of issues raised by Candace in her response to Amy and Anita's Motion for Summary Judgment and in light of issues raised by Carl in Motion for Summary Judgment	2.20	715.00
7/21/2015	NES	Attend court-ordered hearings to address issues surrounding appointment of successor executor and Carl's efforts to transfer district court case to probate court	3.20	1,040.00
7/22/2015	NES	Telephone conference(s) with Carls' attorneys further to efforts to secure agreements regarding summary judgment motions and discovery in light of Court's appointment of successor executor	0.80	260.00
7/22/2015	NES	Preparation and drafting of memorandum to Carl's attorney and Anita's attorney to be used to memorialize and confirm agreements reached as to summary judgment motions	0.10	32.50
7/22/2015	NES	Telephone conference(s) with Vacek & Freed's counsel to address conversation with Carl's counsel and secure approval of certain agreements regarding pending summary judgment in District Court case	0.30	97.50
7/22/2015	NES	Preparation and drafting of memorandum to Carl's attorney and Vacek & Freed's attorney to confirm agreements reached regarding pending motions	0.10	32.50
7/22/2015	NES	Receipt and review of copy of proposed Order prepared by Judge Butts following hearing to be reviewed and commented on by counsel	0.20	65.00

7/22/2015	NES	Receipt and review of copy of proposed Order prepared by Judge Butts following hearing to be reviewed and commented on by counsel	0.20	65.00
7/22/2015	NES	Preparation and drafting of memorandum to Court to confirm agreement reached regarding summary judgments	0.10	32.50
7/23/2015	NES	Telephone conference(s) with client to advise as to recent developments from hearing, to update regarding agreement reached on summary judgment motions, to discuss allegations in Motion for Protective Order	0.30	97.50
7/23/2015	NES	Telephone conference(s) with Anita's counsel to address potential revisions to proposed Order from Court; to discuss strategies and approach to responding to Motion for Protective Order filed by Carl	0.80	260.00
7/23/2015	NES	Receipt and review of multiple e-mails from counsel regarding review and approval of proposed Order, culminating in receipt of official executed Order	0.30	97.50
7/24/2015	NES	Receipt and review of C. Brunsting's Notice of Hearing on his Motion for Protective Order; docket same	0.20	65.00
7/24/2015	NES	Telephone conference(s) with G. Lester regarding appointment, discussing documents in play, parties and relationships, key legal issues and next steps	0.90	292.50
7/27/2015	NES	Communicate with Carl's counsel regarding her e-mails addressing appointment and substitution of G. Lester on behalf of Estate	0.20	65.00
7/29/2015	NES	Telephone conference(s) with Anita's counsel further to issues discussed with G. Lester, discussing strategy for approaching upcoming hearing on Motion for Protection and latest set of discovery requests from Carl's counsel	0.40	130.00
7/30/2015	NES	Telephone conference(s) with Carole's counsel and Anita's counsel regarding discovery issued and Motion for Protection filed, discussing options for responding, discussing Anita's efforts to obtain compromise from Carl/Drina to avoid need for responses	0.40	130.00
7/31/2015	NES	Review first draft of combined Response to Motion for Protective Order filed by Carl/Drina; phone discussions with Carole's counsel and Anita's counsel regarding possible revisions to Response; revise Response as discussed	1.60	520.00

Sub-total Fees: \$6,630.00

Expenses

	Photocopies	8.84
	Postage	6.74
7/2/2015	Harris County Clerk - Probate	2.06

Sub-total Expenses: \$17.64

Total Current Billing:	<u>\$6,647.64</u>
Previous Balance Due:	\$16,810.61
Total Now Due:	<u>\$23,458.25</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

August 31, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
8/3/2015	NES	Receipt and review of D. Brunsting's Third Supplement to Plaintiff's First Amended Petition and Request for Injunctive Relief	0.30	97.50
8/3/2015	NES	Travel to and attend hearing on Motion for Protective Order filed and set by Carl	1.60	520.00
8/3/2015	NES	Preparation and drafting of Objections to Requests for Production received from Carl (in light of issues addressed at hearing on Motion for Protective order)	1.60	520.00
8/4/2015	NES	Receipt and review of memorandum from Court with proposed Temporary Protective Order addressing allegedly illegal video and audio recordings	0.30	97.50
8/4/2015	NES	Multiple communications (phone conferences and e-mails) with counsel for Anita and Carole regarding thoughts, options, and approach to commenting on and responding to issues raised in Protective Order memorandum received from Court	1.80	585.00
8/5/2015	NES	Preparation and drafting of memorandum to client regarding discovery requests from Carl and issues pertaining to recordings and Temporary Protective Order proposed by Court	0.20	65.00
8/6/2015	NES	Telephone conference(s) with client to address responses to Request for Production (supplementing response of 8/3/2015)	0.70	227.50
8/6/2015	NES	Receipt and review of memorandum from Court further to Court's evaluation of commentary by all counsel to Court's proposed Temporary Order	0.20	65.00
8/7/2015	NES	Receipt and review of memorandum from Carl to Court and all counsel further to issues involving recordings and discovery	0.20	65.00
8/10/2015	NES	Receipt and review of various filings, memoranda and proposed orders from Candace regarding her position on issues involving recordings and discovery of same	0.60	195.00
8/17/2015	NES	Receipt and review of Notice under 193.7 from Candace Curtis regarding documents being used at trial	0.20	65.00
8/18/2015	NES	Preparation and drafting of memorandum to all counsel of record to confirm Court's position regarding trial and removal of case from current trial docket	0.20	65.00

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

September 30, 2015

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
9/2/2015	NES	Telephone conference(s) with outside counsel, A. Graves regarding her Firm's possible retention by G. Lester, discussing case facts, history of dispute, Court's Order appointing Lester and underlying basis for doing same; suggesting that Lester's role does not necessarily require retention of counsel	0.80	260.00
9/8/2015	NES	Receipt and review of Application for Authority to Retain Counsel and Notice of Hearing - MacIntyre, McCulloch, Stanfield & Young, LLP; docket same for hearing	0.30	97.50
9/9/2015	NES	Receipt and review of memorandum from client regarding concerns about issues raised in Application for Authority to Retain Counsel; preparation and drafting of response advising as to conversation with Anita's counsel and plan for addressing Application with Court; telephone conference(s) with law firm proposed to be retained in Application, to discuss potential alternative solution (law firm steps in for current Temporary Administrator to perform same function); follow-up telephone conference(s) with Anita's counsel regarding same and regarding draft of proposed Response to Application; review and edit proposed Response to Application	1.60	520.00
9/10/2015	NES	Receipt and review of memorandum from Carl's counsel regarding issues raised in Application and Amy/Anita's Response	0.10	32.50
9/10/2015	NES	Receipt and review of memorandum from Candace in opposition to relief requested by Amy/Anita, but in agreement with appointment of McCulloch law firm	0.20	65.00
9/10/2015	NES	Preparation and drafting of memorandum to Z. Foley, counsel for Vacek & Freed regarding issues to be addressed at hearing	0.20	65.00
9/10/2015	NES	Additional communications with A. Graves regarding issues to be addressed at hearing on Application for Authority to Retain Counsel	0.40	130.00
9/10/2015	NES	Prepare for hearing on Application to Retain Counsel	0.60	195.00
9/10/2015	NES	Travel to and attend hearing on Application for Authority; post-hearing discussion with Anita's counsel and G. Lester	2.40	780.00
9/11/2015	NES	Preparation and drafting of memorandum to client to provide summary and analysis of hearing and post-hearing meeting, discuss next step regarding interaction with G. Lester	0.30	97.50
9/17/2015	NES	Telephone conference(s) with B. Featherston in preparation for meeting	0.40	130.00

with G. Lester

9/18/2015	NES	Receipt and review of Defendant, Candace Kunz's Answers, First Amended Answers and Second Amended Answers to Plaintiff's First Set of Interrogatories with 2,000+ pages of documents	1.20	390.00
9/18/2015	NES	Meeting with B. Featherston and G. Lester addressing trust documents, motivations for changes made by Nelva, working through damage models submitted by Carl and Candace, as well as previously proposed Master's Report to show G. Lester that damages, if they exist at all, are marginal compared to what is being claimed. inaccurately, by Carl and Candace	2.40	780.00

Sub-total Fees: \$3,542.50

Expenses

9/10/2015	Parking - NES		7.00
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Sub-total Expenses: \$7.00

Total Current Billing: \$3,549.50

Previous Balance Due: \$26,147.73

Total Now Due: \$29,697.23

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

January 31, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
1/15/2016	NES	Receipt and review of copy of Lester Report, analyze same relative to positive and negative points raised; multiple memorandum and/or phone conferences to/with client, Anita's counsel, counsel for Vacek & Freed regarding Lester Report and its potential impact on litigation	0.80	260.00
1/17/2016	NES	Receipt and review of memorandum from client with client's comments and thoughts regarding Lester Report to be further addressed during call with client	0.10	32.50
1/18/2016	NES	Receipt and review of memorandum from Vacek & Freed defense counsel regarding next steps post-Report; preparation and drafting of response; telephone conference(s) with client regarding issues and questions about Report and next steps	0.70	227.50
1/18/2016	NES	Telephone conference(s) with B. Featherston regarding Featherston's conversation with Bobbie Bayless, Bayless' position regarding mediation and possible mediators, regarding alternative mediators to suggest, regarding possible mediation positions/settlement plans, regarding farm land and how it may be addressed in mediation	0.40	130.00
1/20/2016	NES	Communicate with client regarding possible use of Judge Coselli as mediator	0.20	65.00
1/21/2016	NES	Telephone conference(s) with Judge Coselli; research qualifications and background of other potential mediators	0.30	97.50
1/21/2016	NES	Additional communications with Vacek & Freed counsel regarding mediators/mediation and counsel's belief that Vacek & Freed will not participate in mediation, if scheduled	0.20	65.00
1/28/2016	NES	Telephone conference(s) with B. Featherston regarding approach to proposing mediation in light of Candy's Motion for Summary Judgment, and plan for addressing Motion	0.50	162.50
1/28/2016	NES	Receipt and review of C. Curtis' Motion for Partial Summary Judgment with Concurrent Petition for Declaratory Judgment	0.30	97.50

Sub-total Fees: \$1,137.50

Expenses

Photocopies 5.10

Sub-total Expenses: \$5.10

Payments

1/29/2016 Payment #2024

200.00

Sub-total Payments: \$200.00

Total Current Billing: \$1,142.60

Previous Balance Due: \$29,497.23

Total Now Due: \$30,639.83

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

February 29, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
2/2/2016	NES	Preparation and drafting of memorandum to C. Reed requesting meeting with or deposition of Candance Freed, to address "facts" pertaining to Nelva's execution of various documents relative to allegation of undue influence and no competency	0.10	32.50
2/4/2016	NES	Receipt and review of response from C. Reed regarding request to meet with C. Freed and Reed's request that a proposed affidavit for Freed to review be prepared	0.10	32.50
2/8/2016	NES	Receipt and review of memorandum from Carole's attorney presenting all-female list of proposed mediators, despite recent memorandum from Anita's counsel stating that male mediator is needed	0.10	32.50
2/10/2016	NES	Preparation and drafting of response to Carole's attorney, reiterating client's belief that male mediator is better suited for addressing issues to be raised/demeanor to be exhibited by Candy	0.10	32.50
2/10/2016	NES	Receipt and review of Motion to Transfer (district court case to probate court) as filed by Candy, with subsequent memorandum to and from Carl's counsel (Bayless) regarding same	0.40	130.00
2/10/2016	NES	Preparation and drafting of follow-up memorandum to C. Reed regarding inability to prepare affidavit prior to meeting with Freed, but discussing academic issues (competency, undue influence and similar) that affidavit will be used to address, if supporting facts can be provided by Freed	0.20	65.00
2/18/2016	NES	Telephone conference(s) with C. Reed further to efforts to obtain deposition and/or affidavit testimony from Candace Freed to address/defute/clarify and competencies issues alleged by Candy ; to address Motion to Transfer filed by Candy and Court's request for a Status Conference	0.30	97.50
2/24/2016	NES	Receipt and review of memorandum from Court regarding whether parties will agree to allow Associate Judge Comstock to preside over status conference/hearing on Motion to Transfer with multiple responses from Candace Curtis and other parties	0.20	65.00
			Sub-total Fees:	<u>\$487.50</u>

Total Current Billing:	<u>\$487.50</u>
Previous Balance Due:	\$30,639.83
Total Now Due:	<u>\$31,127.33</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
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(281) 870-1124

March 31, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
3/2/2016	NES	Receipt and review of correspondence from C. Brunsting advising no longer wishes to be represented by Crain, Caton & James	0.20	75.00
3/7/2016	NES	Receipt and review of C. Kunz-Freed and The Vacek Law Firm's Opposed Motion for Continuance, Order and Notice of Hearing	0.30	112.50
3/7/2016	NES	Preparation and drafting of memorandum to counsel/former-counsel for Carole to determine if letter from Carole suggesting that Firm is no longer counsel is accurate	0.10	37.50
3/9/2016	NES	Prepare for Status Conference/hearings on various Motions involving transfer of case against Vacek & Freed to Probate Court, implications of Carole's attorney's withdrawal as counsel, Candace's recent filings and lack of clarity in same, Lester report as "direction" for how to resolve case and its "recommendation" favoring mediation	0.60	225.00
3/9/2016	NES	Travel to and attend Status Conference/Hearing on Candy's Motions (to transfer district court case against V&F to probate court and to set her summary judgment motions for hearing); to address Lester Report, and potential mediation	2.60	975.00
3/31/2016	NES	Preparation and drafting of and Receipt and review of various 3/21/2016 - 3/30/2016 communications from parties regarding July mediation availability and confirm client's availability; receipt and review of 3/31/2016 "discovery supplementation" memorandum from Candace Curtis and prepare response addressing comments suggesting a refusal to participate in scheduling discussions; preparation and drafting of memorandum to client further to "discovery supplementation" e-mail string with Candace	0.60	225.00

Sub-total Fees: \$1,650.00

Expenses

	Photocopies	5.44
3/9/2016	Parking	8.00

Sub-total Expenses: \$13.44

Payments

3/28/2016	Payment	#2028	400.00
Sub-total Payments:			<u>\$400.00</u>

Total Current Billing: \$1,663.44

Previous Balance Due: \$34,207.74

Total Now Due: \$35,871.18

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

April 30, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
4/19/2016	NES	Receipt and review of Plaintiff, Curtis' correspondence and Motion for Sanctions with Points and Authorities; docket deadline for response	0.40	150.00
4/22/2016	NES	Extended telephone conference(s) with Carl's attorney regarding mediation, strategies for dealing with Candy, whether Carl considers Amy and Anita's production to date as sufficient, discussing ways to insure Candy's attendance at mediation, discussing possible alternatives to mediation relative to Carl's claims; telephone conference(s) with mediator's office to confirm mediation and request that mediation packet be issued despite 3 month advance notice to mediation in anticipation of possible Court involvement compelling mediation attendance; preparation and drafting of memorandum to client providing update and requesting assistance with discovery supplementation	1.60	600.00
			Sub-total Fees:	<u>\$750.00</u>
			Total Current Billing:	<u>\$750.00</u>
			Previous Balance Due:	\$35,871.18
			Total Now Due:	<u>\$36,621.18</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

June 30, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
6/30/2016	NES	Begin review of file materials and general preparations for mediation; telephone conference(s) with S. Mendel in connection with further analysis and evaluation of clients' positions and preparation for mediation; review memorandum from Carl's attorney, Candy and Carole as to mediation and prepare response addressing mediator's packet, telephone conference(s) with mediator to address various issues (mediation fee, Candace Curtis, alignment of parties)	3.60	1,350.00

Sub-total Fees: \$1,350.00

Payments

6/9/2016	Payment	#1251	1,000.00
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Sub-total Payments: \$1,000.00

Total Current Billing: \$1,350.00

Previous Balance Due: \$36,296.18

Total Now Due: \$37,646.18

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281)870-1124

July 31, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
7/1/2016	NES	Telephone conference(s) with client to begin discussing plan for mediation	0.40	150.00
7/5/2016	NES	Receipt and review of Plaintiff's Motion for Sanctions with Points and Authorities (115 page)	0.60	225.00
7/5/2016	NES	Receipt and review of Plaintiff's Petition for Rule 60(b)(6) Relief Final (1,000+ pages)	0.90	337.50
7/7/2016	SSG	Receipt and review of memorandum from S. Mendel regarding suit filed by Curtis in Federal court; receipt and review of 60+ page complaint naming multiple parties including NES and referencing firm; meeting with NES regarding same and strategy moving forward; subsequent receipt and review of memoranda from other defendant attorneys	1.80	765.00
Sub-total Fees:				<u>\$1,477.50</u>

Expenses

Photocopies	10.54
Sub-total Expenses:	<u>\$10.54</u>

Total Current Billing: \$1,488.04

Previous Balance Due: \$37,646.18

Total Now Due: \$39,134.22

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300

Houston, TX 77079

(281)870-1124

August 31, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
8/9/2016	NES	Telephone conference(s) with client to address status of probate litigation in light of federal court lawsuit initiated by Curtis and Munson, confirm non-representation of client in federal court matter, and continued representation in probate litigation pending additional analysis/conflicts	0.60	225.00

Sub-total Fees: \$225.00

Payments

8/20/2016	Payment	#97444479	500.00
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Sub-total Payments: \$500.00

Total Current Billing: \$225.00

Previous Balance Due: \$38,634.22

Total Now Due: \$38,859.22

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

December 31, 2016

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
9/5/2016	NES	Receipt and review of C. Curtis' 25+ page Motion for Relief from Order Pursuant to Fed. R. Civ. P. 60(b)(3) with numerous exhibits, indicating Curtis' effort to undo remand to state court	0.50	187.50
10/28/2016	NES	Preparation and drafting of memorandum to Amy Brunsting to advise as to outcome of Pre-Trial Conference relative to her pending Motion to Dismiss and potential impact of hearings in Federal Court on status of Probate Court litigation	0.20	75.00
11/8/2016	NES	Preparation and drafting of follow-up memorandum to client; telephone conference(s) with Mendel; telephone conference(s) with Bayless	0.60	225.00
11/21/2016	NES	Telephone conference(s) with S. Mendel in preparation for conference call with Bayless to discuss next steps in development of Probate case, including potential settlement opportunities as between Amy, Anita and Carl	0.50	187.50
11/21/2016	NES	Conference call with S. Mendel and B. Bayless to begin process of discussing potential settlement options with Carl, Amy and Anita	0.90	337.50
Sub-total Fees:				\$1,012.50

Expenses

Photocopies	48.96
Sub-total Expenses:	\$48.96

Payments

1/6/2017	Payment	#45217719	100.00
Sub-total Payments:			\$100.00

Total Current Billing:	<u>\$1,061.46</u>
Previous Balance Due:	\$34,678.81
Total Now Due:	<u>\$35,740.27</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

January 31, 2017

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
1/19/2017	NES	Receipt and review of memorandum from Carole Brunsting addressing issues presented in prior memorandum from S. Mendel regarding distribution of monies to beneficiaries	0.10	37.50
1/26/2017	NES	Receipt and review of memorandum from Carole Brunsting regarding lack of presentation of accounting for 2016 from Trustees, Amy and Anita	0.10	37.50
Sub-total Fees:				<u>\$75.00</u>

Payments

1/23/2017	Payment	#53574473	100.00
Sub-total Payments:			<u>\$100.00</u>

Total Current Billing:	<u>\$75.00</u>
Previous Balance Due:	\$35,640.27
Total Now Due:	<u>\$35,715.27</u>

Federal Tax ID #76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

March 31, 2017

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
2/9/2017	NES	Receipt and review of copy of Carole Brunsting memorandum to Mendel seeking accounting from Amy and Anita	0.10	37.50
2/23/2017	NES	Multiple memoranda to and from Mendel and Carole Brunsting regarding June 2016 - December 2016 accounting and documents, including documents Carole claims are missing from produced materials	0.60	225.00
3/2/2017	NES	Receipt and review of multiple memorandum from Mendel regarding accountings and production for September - November 2016	0.60	225.00
3/3/2017	NES	Receipt and review of additional accounting updates from Mendel for December 2016 and January 2017	0.20	75.00
3/28/2017	NES	Receipt and review of multiple memorandum from Carole Brunsting regarding her response to various accounting materials previously provided, review Mendel's response to Carole regarding same	0.20	75.00
			Sub-total Fees:	<u>\$637.50</u>

Payments

3/24/2017	Payment	#71799321	100.00
			Sub-total Payments: <u>\$100.00</u>

Total Current Billing:	<u>\$637.50</u>
Previous Balance Due:	\$35,515.27
Total Now Due:	<u>\$36,152.77</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

April 30, 2017

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
4/19/2017	NES	Receipt and review of memorandum from S. Mendel to Carole addressing Carole's multiple inquiries and communications about distributions and delays in case development	0.10	37.50
4/26/2017	NES	Receipt and review of latest communication from Carole Brunsting to S. Mendel demanding distribution of funds	0.10	37.50
Sub-total Fees:				<u>\$75.00</u>

Payments

5/3/2017	Payment	#80407458	100.00
Sub-total Payments:			<u>\$100.00</u>

Total Current Billing:	<u>\$75.00</u>
Previous Balance Due:	\$36,052.77
Total Now Due:	<u>\$36,127.77</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

May 31, 2017

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
5/3/2017	NES	Receipt and review of documents, reports and filings pertaining to property accounting and tax returns	0.30	118.50
5/16/2017	NES	Telephone conference(s) with S. Mendel regarding next steps in probate court in light of dismissal of federal court claims, review recent e-mail string between Anita and Carole and discuss possible meeting between them, with S. Mendel	0.60	237.00
5/16/2017	NES	Preparation and drafting of memorandum to client to advise as to discussions with Mendel about next steps in probate court following receipt of Federal Court Order dismissing federal court suit	0.20	79.00
5/17/2017	NES	Receipt and review of reply from client with thoughts and questions relative to potential meeting with Carole and next steps in probate court	0.10	39.50
5/17/2017	NES	Preparation and drafting of extended response to client addressing client's comments and questions (summary judgment, meeting with Carole, etc); receipt and review of reply from client approving meeting with Carole, preparation and drafting of memorandum to Mendel regarding same	0.50	197.50
5/19/2017	NES	Receipt and review of memorandum from B. Bayless inquiring as to whether parties should return to discussing potential settlement options as between Carl, Amy and Anita in light of dismissal of federal court action	0.10	39.50
5/31/2017	NES	Follow-up communications with counsel (Bayless and Mendel) regarding receipt of Notice of Appeal and whether filing of Appeal impacts discussion about resumption of settlement discussions as between Carl, Amy and Anita	0.30	118.50

Sub-total Fees: \$829.50

Payments

5/23/2017	Payment	#90345893	100.00
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Sub-total Payments: \$100.00

Total Current Billing:	<u>\$829.50</u>
Previous Balance Due:	\$36,027.77
Total Now Due:	<u>\$36,857.27</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

June 30, 2017

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
6/15/2017	NES	Communicate with Bayless and Mendel regarding Bayless' request for tolling agreement relative to Carl's apparent intent to pursue amendment of pleadings to address previously discussed wiretap/invasion of privacy claims	0.40	158.00
6/19/2017	NES	Further communications with Bayless regarding supposed additional claims against Amy and Anita based on wiretapping statutes, receipt and review of Bayless' proposed tolling agreement based on upcoming statute of limitations deadline	0.30	118.50
6/23/2017	NES	Telephone conference(s) with Mendel regarding authority to proceed with tolling agreement based on Mendel's proposed revisions to Bayless' proposed agreement	0.20	79.00
6/29/2017	NES	Receipt and review of memorandum from Bayless regarding Amy and Anita signing tolling agreement	0.10	39.50
Sub-total Fees:				<u>\$395.00</u>

Payments

6/23/2017	Payment	#98827052	100.00
Sub-total Payments:			<u>\$100.00</u>

Total Current Billing:	<u>\$395.00</u>
Previous Balance Due:	\$36,757.27
Total Now Due:	<u>\$37,152.27</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281)870-1124

September 30, 2017

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
7/13/2017	NES	Receipt and review of additional communication from Bayless regarding tolling agreement and next steps	0.10	39.50
8/17/2017	NES	Receipt and review of memorandum from Carole regarding request for latest accounting	0.10	39.50
Sub-total Fees:				<u>\$79.00</u>

Payments

9/25/2017	Payment	#25801575	100.00
Sub-total Payments:			<u>\$100.00</u>

Total Current Billing:	<u>\$79.00</u>
Previous Balance Due:	\$36,852.27
Total Now Due:	<u>\$36,931.27</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

October 31, 2017

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
9/15/2017	NES	Telephone conference(s) with Mendel; multiple memoranda to and from Mendel regarding communications with Carole and between Carole and Anita regarding options for releasing funds to assist Carole; preparation and drafting of memorandum to Amy regarding above; receipt and review of reply from Amy	0.90	355.50
9/28/2017	NES	Receipt and review of Application for Payment of Fees submitted by Greg Lester for Temporary Administrator services provided	0.20	79.00
10/24/2017	NES	Communicate with client regarding her question about responses in Court of Appeals, review Court of Appeals website for appeal in attempt to answer client's question	0.30	118.50
Sub-total Fees:				<u>\$553.00</u>

Payments

10/23/2017	Payment	#39133434	100.00
Sub-total Payments:			<u>\$100.00</u>

Total Current Billing: \$553.00

Previous Balance Due: \$36,831.27

Total Now Due: \$37,384.27

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

June 30, 2018

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
6/29/2018	NES	Communications between parties from March 2018 pertaining to accounting for Estate property	0.20	79.00
6/29/2018	NES	Communicate with Bayless and Mendel in connection with review and approval of "tolling agreement" as to Carl's wiretapping charges	0.30	118.50
Sub-total Fees:				<u>\$197.50</u>

Payments

6/26/2018	Payment	#9029144	100.00
Sub-total Payments:			<u>\$100.00</u>

Total Current Billing:	<u>\$197.50</u>
Previous Balance Due:	\$36,584.27
Total Now Due:	<u>\$36,781.77</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

July 31, 2018

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
7/31/2018	NES	Receipt and review of Notice of Hearing of Carl Brunsting's Motion for Partial Summary Judgment	0.10	39.50
Sub-total Fees:				<u>\$39.50</u>

Payments

7/24/2018	Payment	#17558321	100.00
Sub-total Payments:			<u>\$100.00</u>

Total Current Billing:	<u>\$39.50</u>
Previous Balance Due:	\$36,681.77
Total Now Due:	<u>\$36,721.27</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

August 31, 2018

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
8/21/2018	NES	Receipt and review of Plea in Abatement filed by Candance; review Motion for Partial Summary Judgment filed in 2015 by Carl in light of it being reset for hearing; telephone conference(s) with Bobbie Bayless regarding Plea, regarding Carl's position relative to Motion for Partial Summary Judgment, regarding possible resumption of settlement discussions; telephone conference(s) with Steve Mendel regarding above and plan for responding to Motion for Partial Summary Judgment/continuing dialogue with Bayless; preparation and drafting of status memorandum to client to address Plea and Motion; receipt and review of response from client	1.80	711.00
8/22/2018	NES	Receipt and review of memorandum from Mendel containing outline of key points and arguments to raise in proposed response to Carl's Motion for Summary Judgment; analyze and consider arguments; preparation and drafting of response to Mendel suggesting additional points and arguments to consider including in Response	1.20	474.00
8/23/2018	NES	Receipt and review of draft of proposed Motion for Continuance pertaining to Carl's Motion for Summary Judgment; preparation and drafting of response to Mendel suggesting revisions to same	0.40	158.00
8/24/2018	NES	Receipt and review of memorandum from B. Bayless, opposing idea of transforming summary judgment hearing into status conference (to address trial, scheduling and abatement)	0.10	39.50
8/28/2018	NES	Receipt and review of file-stamped copies of Motion for Continuance and Order; telephone conference(s) with Mendel's office to confirm "certificate of conference" issues, discuss status of drafting of Joint Response to Carl's Motion for Summary Judgment, address approach to presenting argument to Court during upcoming hearing	0.30	118.50
8/28/2018	NES	Receipt and review of draft of proposed Response to Carl's Motion for Summary Judgment; preparation and drafting of reply to Mendel with comments and suggested revisions; receipt and review of follow-up memorandum from Mendel with question about Affidavit	0.40	158.00
8/29/2018	NES	Preparation and drafting of response to Mendel with additional thoughts and revisions to incorporate into Response; receipt and review of revised Response from Mendel; telephone conference(s) with Mendel to address final comments and approve filing	0.60	237.00

Sub-total Fees: \$1,896.00

Payments

8/20/2018

Payment

#25867906

100.00

Sub-total Payments: \$100.00

Total Current Billing: \$1,896.00

Previous Balance Due: \$36,621.27

Total Now Due: \$38,517.27

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

September 30, 2018

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
9/4/2018	NES	Receipt and review of "Addendum" to Plea in Abatement filed by Candace Curtis, addressing Curtis' perspective as to relation between Abatement and hearing on Carl's Motion for Summary Judgment; preparation for hearing on Motion for Continuance and Motion for Summary Judgment set for 9/05/2018	1.60	632.00
9/4/2018	NES	Telephone conference(s) with Mendel's office to address strategy for hearing, discuss implication of Addendum filed by Curtis	0.30	118.50
9/4/2018	NES	Receipt and review of D. Brunsting's Response to C. Curtis' Plea in Abatement; Response to Joint Motion for Continuance Regarding Carl Brunsting's Motion for Partial Summary Judgment; and Objection to Attachment of Exhibit A to Defendants' Joint Response to Plaintiff's Motion for Partial Summary Judgment	0.70	276.50
9/5/2018	NES	Attend hearing on Carl's Motion for Summary Judgment and Amy/Anita's Motion for Continuance of summary judgment proceedings, discuss potential trial dates and scheduling issues with Court; preparation and drafting of statute memorandum to client	2.30	908.50
9/5/2018	NES	Follow-up conference call with Mendel and Bayless to determine next steps stemming from Court's rulings and instructions, discuss possible settlement scenarios involving Carl, allowing for pursuit of claims against Candy	0.80	316.00
9/6/2018	NES	Receipt and review of memorandum from Court (Judge Comstock) further to issues addressed during 9/5/2018 hearing	0.10	39.50
9/13/2018	NES	Discussions with counsel (B. Bayless and S. Mendel) regarding creation of Docket Control Order in accordance with Court's Order, and in advance of presentation of same to pro se parties (Candace and Carole)	0.40	158.00
9/14/2018	NES	Receipt and review of communications from Mendel and Candace relative to proposed Docket Control Order and overall dispute	0.20	79.00
9/19/2018	NES	Receipt and review of multiple communications with Court and from Carole regarding Carole's objection to mediation and issues regarding case overall and proposed DCO	0.30	118.50
9/26/2018	NES	Receipt and review of multiple communications from Court and Candace regarding Candace's objections to entire process, her objections to attorney's fees being paid out of the trust, her demand that	0.20	79.00

"evidentiary hearings" are necessary, her position that there is "nothing to discuss" and "no room for compromise"

Sub-total Fees: \$2,725.50

Payments

9/20/2018

Payment #40720390

100.00

Sub-total Payments: \$100.00

Total Current Billing: \$2,725.50

Previous Balance Due: \$38,417.27

Total Now Due: \$41,142.77

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

October 31, 2018

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
10/4/2018	NES	Preparation and drafting of memorandum to client to provide update as to developments since hearing of 9/5/2018, discussing upcoming conference call with Mendel and Bayless, present series of questions for review and consideration by client	0.60	237.00
10/8/2018	NES	Receipt and review of multiple communications from Court (Judge Comstock) regarding discovery and status of Carl's Motion for Summary Judgment; 24-Page First Amended Plea in Abatement from Candace Curtis	0.40	158.00
10/9/2018	NES	Receipt and review of various memorandum from Carole and Bobbie Bayless responding to 10/8/18 communications from Judge Comstock; Meeting with Mendel to prepare joint response to Judge Comstock, identifying discover that must be completed before Carl's Motion for Summary Judgment can be heard, discussing approach to 10/10/2018 conference call with Bayless	1.10	434.50
10/10/2018	NES	Receipt and review of memorandum from client in response to questions presented in memorandum of 10/4/2018	0.10	39.50
10/10/2018	NES	Conference call with Bayless and Mendel to address potential settlement with Carl, discussing possible parameters of partial settlement to allow for pursuit of enforcement of QBD as to Candace without opposition from Carl	0.60	237.00
10/11/2018	NES	Begin reviewing prior pleadings filed by Candy as they relate to no-contest clauses and arguments against enforcement, particularly as to allegations of incompetency as time of execution of Qualified Beneficiary Designation; receipt and review of memorandum from Mendel to all parties with appraisal proposal; receipt and review of response from Bayless agreeing on behalf of Carl/Drina; receipt and review of response from Candy objecting; preparation and drafting of response to Candy requesting reconsideration of denial; preparation and drafting of status memorandum to client	1.20	474.00
10/12/2018	NES	Receipt and review of memorandum from Candace Curtis in response to request for reconsideration of refusal to mediate; receipt and review of memorandum from Carole Brunsting; preparation and drafting of proposed memorandum to Judge Comstock and communicate with Mendel regarding content	0.90	355.50
10/13/2018	NES	Communicate with Mendel regarding moving forward with depositions and potential sequence of same	0.20	79.00

Sub-total Fees: \$2,014.50

Payments

10/22/2018

Payment

#49249818

100.00

Sub-total Payments: \$100.00

Total Current Billing: \$2,014.50

Previous Balance Due: \$41,042.77

Total Now Due: \$43,057.27

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

November 30, 2018

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

		Hours	Amount
11/27/2018	NES		
		0.50	197.50
Receipt and review of Notice of Deposition regarding Candace Kuntz-Freed; receipt and review of memorandum between Mendel and Bayless regarding scheduled deposition and Kuntz-Freed anticipated opposition to same, regarding Carole and Candace supposedly being open to mediation, not wanting to mediate with Judge Davidson as previously agreed/ordered; preparation and drafting of memorandum to Mendel regarding whether Kuntz-Freed should be served with subpoena, not deposition notice, whether Nelva Brunsting estate drafting file should be requested from Kuntz-Freed, providing analysis of alternative mediators suggested			
11/30/2018	NES	0.20	79.00
Receipt and review of Motion to Quash Deposition of Kuntz-Freed			
11/30/2018	NES	0.10	39.50
Receipt and review of memorandum from Carole Brunsting advising as to her position regarding mediation, belief that Candace is willing to mediate, indicating that Carole believes Bayless/Drina, not Candace are the impediment to mediation			

Sub-total Fees: \$316.00

Payments

11/26/2018	Payment	#57224823	100.00
Sub-total Payments:			<u> </u> \$100.00

Total Current Billing: \$316.00

Previous Balance Due: \$42,957.27

Total Now Due: \$43,273.27

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

December 31, 2018

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount
12/10/2018	NES Receipt and review of memorandum from Carole Brunsting regarding her efforts to contact potential mediators, her questions about efforts to depose Kunz-Freed and her "offer" to serve as executor; telephone conference(s) with Mendel discussing case strategy in light of Kunz-Freed filing Motion to Quash and for Protection relative to deposition originally set for 12/18/2018, presenting concerns about positioning Carole as executor, suggesting potential alternative means for addressing issues raised by Kunz-Freed, discussing implications of change in Judge and best method for introducing case to new Judge as part of hearing to be set on Kunz-Freed's Motion	0.90	355.50
12/11/2018	NES Preparation and drafting of status memorandum to client addressing recent developments since last report of October 2018	0.30	118.50
12/11/2018	NES Receipt and review of response from client indicating that appointing [redacted] might be warranted based on her prior [redacted] [redacted] ; receipt and review of memorandum from Carole Brunsting in response to issues raised in memorandum of 12/10/2018; preparation and drafting of response to Carole Brunsting seeking clarification of points raised in response	0.60	237.00
12/12/2018	NES Receipt and review of memorandum from Carole Brunsting identifying additional issues and questions (consolidation/Candy supposedly not having claims; supposed violation of Federal Court injunction; originals of QBD documents signed by Nelva; claim that Trust documents do not allow for payment of attorneys fees); review Court records to confirm Candy's claims were brought over; review Restated Trust Agreement (Article IV) and language seemingly supporting Trustee's right to recover fees; preparation and drafting of memorandum to Mendel to coordinate response to Carole, if one; preparation and drafting of memorandum to client to forward e-mail string with Carole	0.40	158.00
12/13/2018	NES Receipt and review of memorandum with client's comments regarding e-mail string with Carole; receipt and review of follow-up memorandum from Carol with more details about Issue 3 from her prior e-mail; preparation and drafting of response to Carole attempt to address various issues raised, discussing interaction between ancillary matters designated 401 and 402 by the Court, addressing interaction with District Court filing against Vacek & Freed	0.60	237.00
12/14/2018	NES Receipt and review of reply from Carole asserting that 402 proceeding (Candy's claims) do not exist because Court never signed anything;	0.20	79.00

preliminary discussion with S. Mendel regarding this issue as designation as 402 should be only required acknowledgment by Court, speculating that Carole/Candy/Rik may be confused as between the opening of the 402 proceeding and the Motion to Consolidate the District Court case (and the 402 proceeding) with the 401 proceeding, which the Court has not yet ruled on

12/17/2018	NES	Discussion with Mendel regarding content of latest memorandum received from Carole	0.20	79.00
12/18/2018	NES	Receipt and review of copy of Anita's Motion to Compel Deposition of Candace Kunz-Freed	0.20	79.00
			Sub-total Fees:	<u>\$1,343.00</u>

Payments

12/27/2018	Payment	#65295327	100.00
			Sub-total Payments: <u>\$100.00</u>

Total Current Billing:	<u>\$1,343.00</u>
Previous Balance Due:	\$43,173.27
Total Now Due:	<u>\$44,516.27</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281)870-1124

January 31, 2019

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
1/3/2019	NES	Preparation and drafting of response to Carole's memorandum of 12/14/2018	0.20	79.00
1/3/2019	NES	Receipt and review of memorandum from Carole Brunsting - no interest in settlement because "I had nothing to do with starting or prolonging this"; stating that her prior counsel told her no one would be responsible for attorney's fees	0.10	39.50
1/4/2019	NES	Communicate with Mendel regarding potential ways to address issues raised in Kunz-Freed opposition to deposition as it relates to alleged privileges preventing her from being deposed	0.20	79.00
1/16/2019	NES	Receipt and review of Anita's Response to Kunz-Freed's Motion for Protective Order (to prevent deposition)	0.20	79.00
1/22/2019	NES	Receipt and review of Kunz-Freed Reply to Anita's Response	0.20	79.00
1/22/2019	NES	Preparation and drafting of Reply to Kuntz-Freed Response to Anita's Motion to Compel Deposition; communicate with Mendel regarding content and filing of same	2.20	869.00
1/24/2019	NES	Prepare for, attend and argue merits of Motion to Compel Deposition of Candace Kunz-Freed; post-deposition discussion with counsel for Kunz-Freed regarding approach of filing motion ; receipt and review of copy of Court's Order regarding deposition of Kunz-Freed; receipt and review of Mendel's subsequent e-mail to counsel requesting deposition dates; receipt and review of memorandum from Carole indicating that she has writing from Court confirming that 401 and 402 were not consolidated	4.40	1,738.00
1/25/2019	NES	Preparation and drafting of response to Carole requesting copy of document she is referencing; preparation and drafting of memorandum to counsel for Kunz-Freed regarding approach of filing motion ; preparation and drafting of status update to client regarding hearing and deposition; preparation and drafting of proposed draft of Motion for Clarification and to Dismiss to address various issues raised by other parties seemingly unaware or ignoring Court's order consolidation of 402 and 401 proceeding, discussing Curtis' failure to prosecute claims since dismissal of Federal Court RICO proceeding, requesting relief regarding Curtis' claims as directly made or as presented to Court by Carole during recent hearings; Demand for Proper Identification of Parties and Claims filed by Curtis, with 4-page proposed Order	3.60	1,422.00

1/28/2019	NES	Receipt and review of memorandum from B. Bayless forwarding copies of filings in District Court by Freed (Motion to Dismiss), with Exhibits, Notice of Hearing and proposed Order	0.30	118.50
1/28/2019	NES	Receipt and review of memorandum from Amy regarding her mom driving to appointments including with Freed by her self as example of competence; preparation and drafting of response to Amy addressing and expanding on same, discussing recent filings by Freed and Candy, discussing Motion for Clarification that was in the process of being drafted and possible expansion of same to address Freed and Candy's filings	0.40	158.00
1/28/2019	NES	Revise and continue preparation of Amy's Motion for Clarification [REDACTED] in light of Carole's comments at hearing, in light of Kunz-Freed's filing of Motion to Dismiss in District Court, and in light of Candy's most recently filings; communicate with Mendel and counsel for Kunz-Freed regarding deposition as ordered per Court; telephone conference(s) with Judge Comstock regarding need for hearing on Motion in light of Kunz-Freed filing in District Court; further communication with client regarding Motion being drafted and client's thoughts about various issues	3.40	1,343.00
1/29/2019	NES	Receipt and review of Mendel's comments and suggested revisions to Motion; finalize Motion and Affidavit; prepare Notice of Hearing and file all documents; multiple memoranda to and from Mendel regarding Freed deposition and items to request in document subpoena, discussing competency issues raised by Carl/Bayless despite Bayless commentary at hearing of 1/24/19; discussing strategy for deposing Curtis subsequent to Freed deposition; receipt and review of Anita's notice joining in Amy's Motion; begin review of Carole Brunsting deposition transcript in light of commentary by Carole Brunsting during hearing of 1/24/2019	3.20	1,264.00
1/29/2019	NES	Receipt and review of Anita Brunsting's Motion to Join Amy Brunsting's Motion for Clarification and/or Motion to Dismiss	0.20	79.00

Sub-total Fees: \$7,347.00

Expenses

1/23/2019		Harris County Probate Court #4 Responses		2.06
1/29/2019		Harris County Probate Court #4 Motion		2.06
1/29/2019		Harris County Probate Court #4 Notice of Hearing		2.06
			Sub-total Expenses:	<u> \$6.18</u>

Payments

1/21/2019	Payment	#73527109		100.00
			Sub-total Payments:	<u> \$100.00</u>

Total Current Billing:	<u>\$7,353.18</u>
Previous Balance Due:	\$44,416.27
Total Now Due:	<u>\$51,769.45</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

April 30, 2019

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
etal.

Professional Fees			Hours	Amount
2/1/2019	NES	Review Restated Trust, August QBD, and Petitions filed by Carl and Candy from inception to current, prepare summary chart reflecting claims, terms of triggering events for no contest clauses, and events identified by Courts via case law as not triggering no contest clauses; preparation and drafting of memorandum to Mendel to forward and share same, discuss above as potential area to cover in Freed deposition	2.10	829.50
2/4/2019	NES	Receipt and review of Curtis' Response to Amy's Motion to Clarify with voluminous exhibits; work on new Chart summarizing key terms and provisions relative to Nelva's Will, the Restated Trust, the First Amendment to Restated Trust, and both QBDs in preparation for Thursday's hearing so as to be able to address with Court the workings of the Trust relative to the claims asserted by Carl and Candy (for example, distributions able to be made in unequal amounts, or to some but not all); preparation and drafting of summary chart of Estate Code and Trust Code provisions addressing subject matter jurisdiction in light of Candy's position that Probate Court lacks jurisdiction; summarizing elements and exceptions to "dominant jurisdiction" theory to negate Candy's continuing allegation that case should be "returned" to federal court; initiate preparation and drafting of Reply to Candy's Response	5.70	2,251.50
2/5/2019	NES	Receipt and review of Vacek & Freed's Response to Amy's Motion to Clarify; Receipt and review of Bayless' response to Amy's Motion to Clarify; finalize draft of proposed Reply to Candy's Response; preparation and drafting of memorandum to Mendel regarding draft Reply	1.90	750.50
2/6/2019	NES	Prepare for 2/07/2019 hearing on Motion, including outline of argument talking points both in support of Motion and to refute Responses and other filings by Freed, Candy, and Carl	1.80	711.00
2/6/2019	SSG	Work with NES to assist in preparation for hearing; review pleadings, motions and responses; discussion regarding academics and presentation strategy	1.90	855.00
2/7/2019	SSG	Meeting with NES to discuss contents of QBD and hearing ; discussion regarding deposition, briefing, academic challenges and going forward matters	0.70	315.00
2/7/2019	NES	Travel to and attend hearing on Motion to address 4 key issues; post-hearing meeting with Bayless to address next steps in District	4.30	1,698.50

		Court action depending on Court's ruling on transfer, discussing issues regarding Carl's claims and allegations against Amy (claiming that Amy directly "bullied" Nelva into making changes to Trust Documents; preparation and drafting of memorandum to client to address and summarize outcome of hearing; preparation and drafting of memorandum to C. Curtis regarding Court's instructions at hearing and related deadlines; perform preliminary review of Texas Rule of Evidence 503(d)(4) in light of Court's request for briefing on this Rule; preparation and drafting of memorandum to Court seeking further instruction about option to brief other portions of Rule 503 that are potentially applicable; receipt and review of Court's response allowing additional briefing		
2/11/2019	NES	Receipt and review of memorandum from R. Munson in partial response to Court's deadlines and instructions regarding additional briefing	0.10	39.50
2/14/2019	NES	Receipt and review of two Orders from the Court addressing 2 of 4 issues discussed during hearing of 2/07/2019; receipt and review of Notice of Deposition relative to Kunz-Freed and memorandum from counsel (C. Reed) agreeing to accept service of same; preparation and drafting of status memorandum to client regarding Orders, outstanding issues not yet ruled on by Court (control over lawsuit against Kunz-Freed), addressing possible relation between remaining issues and requested briefing, asking client for information to assist in preparing for deposition of Kunz-Freed	0.60	237.00
2/18/2019	SSG	Review and discuss regarding upcoming matters related to case development and efficiencies in crafting and supporting motions and potential counterclaims as between trustees/executors	0.40	180.00
2/18/2019	NES	Continue research on attorney-client privilege issues specific to Court's instructions for March 1 briefing, reviewing issues of standing of beneficiaries file suit against drafting attorney in comparison to estate's standing to do so, examine "misrepresentation" claims for non-clients; communicate with Mendel regarding same	2.20	869.00
2/20/2019	NES	Receipt and review of memorandum from Mendel with draft of proposed Requests for Production to Curtis	0.20	79.00
2/22/2019	NES	Receipt and review of filings from Candy Curtis including Objection to Motion for Farm Appraisal, Demand for Accounting, Notice of Intent to Participate in Deposition (of Kunz-Freed), and Memorandum regarding application of Texas Rule of Evidence 503 to Kunz-Freed deposition; preparation and drafting of third follow-up memorandum to client to address issues stemming from hearing of 2/07/2019	0.30	118.50
2/25/2019	NES	Prepare for meeting with S. Mendel to address plan for preparing briefing materials on attorney-client privilege, plan for preparing for deposition of Kunz-Freed, and plan for filing affirmative claims on to trigger forfeiture clauses, alternative claims against Vacek & Freed & misrepresentation claims for Amy & Anita; telephone conference(s) with client to address above, obtain client's approval to waive privilege (if it is determined to apply); meeting with S. Mendel to address above issues	3.20	1,264.00
2/25/2019	SSG	Meeting with NES to discuss and review context of meeting with counsel; discussion regarding division of responsibilities and efficiencies; discussion regarding strategic and academic issues and	0.60	270.00

		Vacek & Freed during the course of District Court malpractice case, start preparing outline for Freed deposition relative to materials reviewed		
3/15/2019	NES	Preparation and drafting of memorandum to C. Reed authorizing production of Amy's communications with Freed and indicating waiver of any privilege applicable to documents	0.10	39.50
3/18/2019	NES	Preparation and drafting of follow-up memorandum to C. Reed to address production of approved communications to other parties relative to upcoming deposition	0.10	39.50
3/18/2019	NES	Receipt and review of memorandum from Bayless inquiring as to whether any issues need to be scheduled for hearing prior to beginning of Freed deposition; preparation and drafting of response as to Amy's waiver and no necessity for hearing on privilege issues	0.20	79.00
3/19/2019	SSG	Work with NES on review of documents and preparation for deposition	2.40	1,080.00
3/19/2019	NES	Multiple telephone conversations with Mendel in regarding to issues to be addressed during Freed deposition; preparation and drafting of memorandum to all parties as to waiver of privilege if/as applicable to communications between Amy and Freed; receipt and review of memorandum from C. Reed regarding official supplementation of Freed's prior document production; continue efforts to review 2500+ documents received from C. Reed (Freed's production as to Nelva, not as to Amy & Anita as previously reviewed) and continued preparation of deposition outline for Freed's deposition	6.20	2,449.00
3/20/2019	NES	Pre-deposition meeting with Mendel further to aligning strategy for conduct of deposition; Attend and participate in Deposition of Candace Kunz-Freed; Post-deposition discussion with attorneys regarding protocol for reconvening deposition as it was not completed during Day 1; receipt and review of hand-delivered copy of Curtis' "Application for Orders to Show Cause Why Defendants and Their Counsel Should Not Be Held in Contempt of This Court's Injunctive Orders" filed in previous remanded and closed federal court proceeding before Judge Hoyt	8.60	3,397.00
3/23/2019	NES	Review Judge Hoyt/Federal Court rulings prior to remand, obtain copy of 10/03/2013 Order requiring Curtis to obtain legal counsel; preparation and drafting of memorandum to Mendel suggesting strategy for addressing recent Federal Court filing by Curtis	0.40	158.00
3/25/2019	NES	Receipt and review of response from Mendel together with outline of possible settlement proposal excluding Candy, to potentially be offered to Carl and Carole; preparation and drafting of response to Mendel with concerns about potential settlement proposal and possible alternative approach	0.30	118.50
4/16/2019	NES	Receipt and review of Affidavit of Candace Louise Curtis in Support of Application for Orders to Show Cause	0.40	158.00
4/22/2019	NES	Initiate preparation of Motion for Contempt and Sanctions against Curtis in light of her recent filing in closed Federal Court case with Judge Hoyt	1.20	474.00

Sub-total Fees: \$24,701.50

		timing for filings		
2/26/2019	NES	Receipt and review of memorandum from C. Reed indicating that production of Freed records also implicates privileges owed by Freed to Amy and Anita pursuant to direct representation of each, providing copy of proposed waiver; communicate with Mendel and with client regarding same, advised by client that yes there were direct communications with Freed and that client will provide copies of same; initiate sections of Amy and Anita's Joint Brief responding to attorney-client privilege issues addressed by Court per division of labor as to brief's content as agreed during meeting of 2/25/2019	3.80	1,501.00
2/27/2019	NES	Work with Mendel on issues regarding discovery requests Mendel is preparing and considering issuing to Curtis; receipt and review of communications between Judge Comstock and B. Bayless regarding implementation of transfer of District Court proceeding to Probate Court and status of 3/8 hearing noticed prior to transfer	0.60	237.00
2/28/2019	NES	Receipt and review of Mendel's comments to Amy's section of proposed Brief plus review of Anita's sections; telephone conference(s) with Mendel regarding content and comments; revise, finalize and prepared Brief for filing; further discussions with counsel and Court regarding implementation of transfer of District Court proceeding	2.20	869.00
3/1/2019	NES	Receipt and review of Notice of Order on Motion to Transfer District Court Proceedings to Probate Court 4 with Proposed Order	0.30	118.50
3/1/2019	NES	Receipt and review of C. Brunsting's Brief Concerning Attorney-Client Privilege issues with regard to the deposition of C. Freed	0.30	118.50
3/6/2019	NES	Receipt and review of Candace Kunz-Freed's Response to Anita Brunsting's Subpoena Duces Tecum with 2,000+ pages of responsive documents	1.60	632.00
3/7/2019	NES	Attend hearing on Motion for Farm Appraisal (granted), due to Curtis' objection to same (Curtis did not appear at hearing); post-hearing discussion regarding ongoing attorney-client privilege issues, including now issues that relate to communications between Freed and Amy/Anita; agree that all such documents will be produced to Amy/Anita for review and either waiver or submission of privilege log; preparation and drafting of memorandum to client regarding above and modification of prior project to be undertaken by client to review her files and obtain, copy and forward all communications with Freed, discuss receipt of documents from Freed's counsel (not yet reviewed) and provide copies of same to client	1.40	553.00
3/11/2019	NES	Review and analyze documents received from C. Reed relative to communications with and between Freed and Amy/Anita as it relates to potential production and waiver of privilege; communicate with Mendel to determine Anita's position on waiver and production	1.20	474.00
3/12/2019	NES	Receive authorization from Amy to produce/waive documents received from Freed; discussion with Mendel as to method for production, independently or via Freed	0.20	79.00
3/14/2019	NES	Begin reviewing voluminous documents provided by Bayless constituting production obtained via pre-suit deposition notice to Carole and/or from	4.20	1,659.00

Expenses

	Photocopies		32.64
2/1/2019	Color Copy Charges		9.18
2/5/2019	Harris County Probate Court #4		2.06
3/1/2019	Harris County Probate Court #4 - Brief		2.06
3/20/2019	Southwest Reporting Service		1,799.93
		Sub-total Expenses:	<u>\$1,845.87</u>

Payments

2/20/2019	Payment	#81428291	100.00
3/19/2019	Payment	#89374204	100.00
4/23/2019	Payment	#97915662	100.00
		Sub-total Payments:	<u>\$300.00</u>

Total Current Billing:	<u>\$26,547.37</u>
Previous Balance Due:	\$51,469.45
Total Now Due:	<u>\$78,016.82</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

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(281) 870-1124

June 30, 2019

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount
5/2/2019	NES	Telephone conference(s) with Carole Brunsting regarding continuation of Freed deposition, discussing reports and accountings, inquiring as to Carole's recollections as to reasons mother made changes as to Carl and Candy, her belief as to persons "at fault" during to arrogance, failure to communicate and similar	0.70 276.50
5/8/2019	NES	Receipt and review of e-mail from Rick Munson providing copy of Notice of Setting suggesting telephonic conference has been scheduled for today with Judge Hoyt; review Court's online Docket Sheet to determine if hearing was held and outcome of same (no minute entries yet), call Judge Hoyt's Case Manager and leave message regarding above; discussion with S. Mendel, preparation of follow-up memorandum to Case Manager further to voicemail, obtain S. Mendel's comments and approval to send same, finalize and send memorandum to Case Manager	0.80 316.00
5/8/2019	NES	Continue preparation of Motion for Contempt and for Sanctions to be filed against Curtis; preparation and drafting of memorandum to Mendel to determine if Anita wants to join in Motion, or if Amy should proceed independently on this issue	2.60 1,027.00
5/14/2019	NES	Receipt and review of memorandum from Mendel with comments to proposed Motion for Contempt; review Federal Court file to confirm outcome of 5/08/2019 hearing with Judge Hoyt; preparation and drafting of memorandum to C. Reed to address reconvening Freed deposition, with follow-up telephone call with C. Reed regarding same and e-mail communication with Mendel; communicate with Court regarding hearing or submission options relative to Motion; preparation and drafting of status report to client as to developments since Day 1 of Freed deposition, discussing next steps and additional information needed from client; prepare Attorney's Fees Affidavit for inclusion with Motion for Contempt; communicate with Bayless regarding Freed deposition	2.60 1,027.00
5/17/2019	NES	Receipt and review of Notice of Intention to Continue the Deposition of C. Kunz-Freed	0.20 79.00
5/17/2019	NES	Telephone conference(s) with co-defendant, Carole Brunsting regarding supposed conversation with sister Candy - Candy supposedly wants to give up case, but Rik Munson is writing response to Motion for Contempt, Candy supposedly talked to old friend (Charles Seymore?) who per Candy is former Judge, and per Carole, was told to apologize	1.30 513.50

		to Court and attorneys for conduct, and to be very careful how she proceeds; communicate with client to provide update regarding above		
5/20/2019	NES	Preparation and drafting of memorandum to Mendel with two proposed Requests for Production to be sent to Carole and Candy seeking communications between them about the lawsuits	0.20	79.00
5/21/2019	NES	Preparation and drafting of proposed draft of Original Counterclaims to assert against Carl and Candy; preparation and drafting of memorandum to Mendel to discuss proposed filing, whether Anita will join as co-trustee and related issues	2.70	1,066.50
6/7/2019	NES	Receipt and review of multiple memorandum between Anita and other parties, between Mendel and other parties pertaining to 2018 accounting files	0.40	158.00
6/12/2019	NES	Receipt and review of Curtis' Response to Amy's Motion for Contempt styled as "Response to the Fiduciary's Application for the Beneficiary to be Held in Contempt for Seeking to Enforce the Injunction Commanding the Trustee to Perform a Fiduciary Duty Owed to The Beneficiary with Petition for Partial Summary or Declaratory Judgment" including exhibits (Original Trust, Restated Trust and e-mail from Nelva to Anita dated 6/0/2008 regarding Elmer's supposed incompetence)	0.60	237.00
6/14/2019	NES	Receipt and review of memorandum from Court regarding instructions about upcoming hearing, follow-up communication with Court regarding same; preparation and drafting of memorandum to all parties to confirm availability in accordance with Court's instructions; receipt and review of responses from all parties; preparation and drafting of follow-up memorandum to Court to advise as to all parties confirming availability	0.40	158.00
6/24/2019	NES	Multiple memoranda to and from Court and client regarding Day 2 of Freed deposition and upcoming hearing on Motion for Contempt/Sanctions	0.40	158.00
6/25/2019	NES	Initiate review of Freed deposition transcript from Day 1 of deposition in connection with preparation for Day 2 of deposition	3.20	1,264.00
6/26/2019	NES	Continue preparation for Day 2 of Freed deposition, including call with Mendel relative to areas of concerns from Day 1 deposition from Bayless and options for addressing concerns during Day 2	2.40	948.00
6/27/2019	NES	Attend and participate in Day 2 of Candace Freed Deposition	5.80	2,291.00
6/28/2019	NES	Prepare for hearing on Motion for Contempt/Sanctions	0.70	276.50
6/28/2019	NES	Attend and participate in hearing on Motion for Contempt/Sanctions	1.60	632.00
			Sub-total Fees:	\$10,507.00

Expenses

5/15/2019		Harris County Probate Court No. 4 - Motion for Sanctions and/or Contempt		2.06
5/21/2019		Harris County Probate Court No. 4 - Notice of Hearing		2.06

6/27/2019	NES - Parking	8.00
6/28/2019	NES - Parking	6.00
Sub-total Expenses:		<u>\$18.12</u>

Payments

6/19/2019	Payment	#39481205	1,000.00
6/24/2019	Payment	#40911938	200.00
Sub-total Payments:			<u>\$1,200.00</u>

Total Current Billing:	<u>\$10,525.12</u>
Previous Balance Due:	\$76,716.82
Total Now Due:	<u>\$87,241.94</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

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(281) 870-1124

July 31, 2019

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees

			Hours	Amount
7/1/2019	NES	Receipt and review of documents from Cory Reed pertaining to how Vank & Freed/Trustee "funded" different trusts (after Elm died)	0.30	118.50
7/2/2019	NES	Preparation and drafting of memorandum to client to provide update as to last week's deposition and hearing, discuss possible next steps	0.20	79.00
7/3/2019	NES	Receipt and review of response from client (n/c); confirm requirements for content of finding/order of contempt; preparation and drafting of proposed Order on Motion to Compel/for Sanctions consistent with Court's instructions at 6/28/2019 hearing, and procedural requirements for finding of contempt	1.10	434.50
7/9/2019	NES	Receipt and review of 6-page "Memorandum on Appointing an Administrator" as filed by Candace Curtis, and receipt and review of 8-page proposed Findings of Fact, Conclusions of Law and Order after Hearing as filed by Candace Curtis in relation to 6/28/2019 hearing on Motion for Contempt/Sanctions	0.60	237.00
7/11/2019	NES	Telephone conference(s) with Mendel's office regarding reasoning behind not responding to Curtis' recent filings at this time, discussing summary judgment issues, whether affirmative claims should be filed, whether Curtis deposition is needed at this time, review various drafts and communications regarding tolling agreement from 6/30/19 - 7/11/2019, culminating in execution and exchange of signed tolling agreement	0.60	237.00
7/23/2019	NES	Receipt and review of Court's Order Granting Motion for Contempt and Sanctions; communicate with client regarding same	0.30	118.50
7/25/2019	NES	Multiple memoranda to and from Mendel and Bayless, and with client regarding grievance filed by Drina against Featherstone and implications of same on further development and plan for case	0.40	158.00
Sub-total Fees:				\$1,382.50

Expenses

5/31/2019	United States District Court	5.70
6/30/2019	United States District Court	0.70
7/3/2019	Harris County Probate Court # 4 - Motion for Sanctions	2.06

and/or Contempt

Sub-total Expenses: \$8.46

Payments

7/25/2019

Payment #4910942

200.00

Sub-total Payments: \$200.00

Total Current Billing: \$1,390.96

Previous Balance Due: \$87,041.94

Total Now Due: \$88,432.90

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
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(281) 870-1124

October 31, 2019

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount
8/12/2019	NES	0.60	237.00
Receive message that Carole Brunsting called suggesting that "everyone" is on board to attend mediation; multiple communications with S. Mendel and B. Bayless as to whether either has any knowledge of agreed-to mediation, advised (by Bayless) of possible involvement of Charles Seymore and "flexible mediation", begin discussing respective experiences with/evaluation of Seymore, discuss belief of prior connection between Candy and Seymore			
8/13/2019	NES	0.20	79.00
Discussion with Mendel as to status of review of proposed Counterclaims against Carl and Candy, relative to potential mediation; further discussing Mendel's perspective regarding Seymore and prior connection to Candy			
8/14/2019	NES	0.20	79.00
Additional communications with Bayless and Mendel regarding possibility of mediation with Seymore			
8/14/2019	NES	0.40	158.00
Multiple communications with client regarding conversations between Anita and Carole, issues regarding mediation, possible selection of mediators, preferred outcome of litigation relative to Candy and Carl, further discussions issues regarding monies distributed to client by Anita (at mom's instruction) and Carl's position regarding those distributions			
8/15/2019	NES	0.30	118.50
Receipt and review of copy of memorandum from Carole Brunsting to all siblings and counsel regarding mediation, and mediation fees, receipt and review of responses from Amy and Anita directly to Carole, Seymore and other parties agreeing to mediation with Seymore, receipt and review of additional communications from Bayless resisting idea of mediation, expressing concerns about arrangement being proposed			
8/16/2019	NES	0.40	158.00
Communicate with client regarding evaluation and perspective as to proposed mediation, how mediation might impact prior discussions with client about her preferred outcome			
8/19/2019	NES	0.10	39.50
Receipt and review of memorandum from Mendel to Firm and to Bayless outlining list of proposed issues that should be addressed with Seymore regarding potential mediation			
9/4/2019	NES	0.10	39.50
Communicate with client to confirm that there has been no contact with Candy, no indication that fees or penalties have been paid per Court's contempt order, providing instruction to contact/talk with Seymore			
9/5/2019	NES	1.10	434.50
Telephone conference(s) with Seymore regarding case facts, his			

		connection to Candy, how he was approached (by Carole/Candy), his thoughts on how he would proceed with mediation if all agreed, discussing conditions to mediation from Amy's perspective, addressing case facts/Lester Report, discussing recent contempt order, discussing fee structure relative to Amy/Anita being "one party" as co-trustees, stating openness to mediation, pending response as to conditions and results of Seymore pending conversations with Bayless and Mendel; preparation and drafting of memorandum to client to confirm conversation with Seymore; preparation and drafting of memorandum to Mendel summarizing key points of conversation so that Mendel can confirm positions taken		
9/10/2019	NES	Multiple communications to and from Bayless regarding Seymore conversation of 9/5/2019, her communications with Seymore, her concerns regarding mediation/mediation with Seymore	0.60	237.00
9/17/2019	NES	Further communication from and with Bayless indicating no further contact or follow-up from Seymore, indicating whether cost might be a potential factor if Candy/Carole have decided not to proceed	0.10	39.50
9/26/2019	NES	Receipt and review of memorandum from Seymore advising as to "unanimous agreement" of siblings in favor of mediation, advising that fee has been lowered to \$1,000 per side; receipt and review of multiple additional communications from Bayless regarding absence of unanimous agreement of siblings, at least from Carl perspective, learning that Carole is the one who spoke/mis spoke as to "unanimous agreement" of siblings	0.30	118.50
10/2/2019	NES	Multiple memorandum to and from Bayless and Mendel pertaining to alleged direct communications between Candy and Carl/Drina regarding settlement	0.10	39.50
10/3/2019	NES	Receipt and review of multiple memorandum from Bayless regarding supposed conversations between proposed mediator (Seymore) and Amy/Anita, regarding which parties have/have not agreed to mediate with Seymore	0.10	39.50
10/7/2019	NES	Receipt and review copy of memorandum from Bayless to Seymore (all parties) indicating that Carl/Drina agree to mediation	0.10	39.50
10/10/2019	NES	Receipt and review of memorandum from Mendel providing copy of Seymore's memorandum to Mendel explaining Candy's position regarding attorney's fees; receipt and review of copy of Mendel's response to Seymore	0.10	39.50
10/15/2019	NES	Receipt and review of memorandum from Seymore proposing that all invoices pertaining to Amy and Anita's respective attorney's fees be produced for his review and consideration; receipt and review of Mendel's response to Seymore opposing request	0.10	39.50
10/16/2019	NES	Receipt and review of Motion to Appoint Personal Representative of Administrator, filed by Candace Kunz-Freed	0.20	79.00
10/22/2019	NES	Receipt and review of client's memorandum of 10/18/19 and prepare comprehensive response evaluating latest Vacek & Freed motion, potential for mediation, and possible path forward	0.80	316.00

10/22/2019	NES	Receipt and review of memorandum from Mendel regarding concerns about possible direct discussions between siblings that are not being discussed which may impact case management/mediation strategy receipt and review of memorandum from Mendel with proposed redlines/revisions to Original Counterclaims; telephone conference(s) with Mendel regarding various issues - potential Rule 408 Settlement Offer and possible content of same; Amended Answer being prepared by Mendel; approach to responding to Vacek & Freed's Motion to Appoint Personal Representative; Curtis' ongoing contempt and potential for second motion for contempt, discussing division of labor on projects by Firms and coordinating/timing/logistics for completing and filing documents; Initiate drafting of revised Original Counterclaims based on comments received from and discussions with Mendel	1.30	513.50
10/28/2019	NES	Receipt and review of draft of proposed Second Amended Answer from Mendel; receipt and review of memorandum from Mendel forwarding and discussing spreadsheet obtained from Anita, supposedly prepared by Curtis and circulated among certain siblings/sent to Seymore; receipt and review of memorandum from Mendel with summary and supporting materials received in connection with Farm appraisal	0.60	237.00
10/29/2019	NES	Receipt and review of memorandum from Seymore regarding his review of "chart of distributions" and need to discuss to determine potential parameters of settlement; receipt and review of copy of Mendel's response indicating that chart has never been previously produced and that chart appears to be inaccurate	0.10	39.50

Sub-total Fees: \$3,120.50

Payments

8/20/2019	Payment	#56811107	200.00
9/20/2019	Payment	#64646639	200.00
10/21/2019	Payment	#72253533	200.00
Sub-total Payments:			<u> </u> \$600.00

Total Current Billing: \$3,120.50

Previous Balance Due: \$87,832.90

Total Now Due: \$90,953.40

Griffin & Matthews

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November 30, 2019

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount	
11/4/2019	NES	Telephone conference(s) with S. Mendel further to draft of Amended Answer for Co-Trustees, suggesting revisions to same; discuss plan for proceeding with Response to Motion to Appoint Personal Representative, finalizing Original Counterclaims, deadline with Curtis' ongoing contempt, and possibility of asserting claims against Vacek & Freed; preparation and drafting of draft of proposed Response to Vacek & Freed Motion to Appoint Personal Representative, receive approval from Mendel regarding content of same; receive draft of settlement proposal and propose edits/address questions about content	3.60	1,422.00
11/5/2019	NES	Preparation and drafting of Motion for Second Contempt with proposed Order; telephone conference(s) with client regarding recent developments and strategy/authority to proceed; preparation and drafting of memorandum to Judge Seymore to address questions about proposed mediation; telephone conference from Judge Seymore to address questions and other factors pertaining to mediation; telephone conference(s) with S. Mendel further to conversation with Seymore and Seymore's requested meeting to discuss attorney's fees incurred by both firms; receipt and review of memorandum from Bayless regarding mediation; preparation and drafting of response to Bayless addressing mediation and inquiring as to her/Carl's position regarding tomorrow's hearing on Vacek & Freed motion; receipt and review of revised draft of proposed Rule 408 Offer prepared by Mendel; preparation and drafting of response with additional thoughts; receipt and review of copy of memorandum from Mendel to Curtis requesting deposition dates in event mediation not successful by late November/early December; preparation and drafting of memorandum to client providing update as to today's developments, discussing Farm appraisal and Spreadsheet received from Mendel on 10/28/2019	4.80	1,896.00
11/6/2019	NES	Travel to and attend hearing on Vacek & Freed Motion to Appoint Executor - hearing did not proceed in light of court reporter issues, matters discussed between and among parties pertaining to mediation, further pursuit of claim against Vacek & Freed, Court's perspective regarding resetting hearing	1.60	632.00
11/7/2019	NES	Preparation and drafting of Status Report to client in light of developments at non-hearing of 11/06/2019, in response to client's memorandum of 11/05/2019	0.10	39.50
11/7/2019	NES	Exchange e-mails with Mendel and Bayless regarding Curtis deposition mediation proceeds unsucessful	0.10	39.50

11/13/2019	NES	Prepare for meeting with Judge Seymore, including by reviewing and redacting Firm invoices from inception of retention through October 2019, as requested by Judge Seymore, preparation and drafting of correspondence to Judge Seymore presenting invoices as confidential and mediator's eyes only, presenting scope of authority to discuss content; prepare outline for issues pertaining to Trust provisions dealing with no-contest issues and Trustee's recovery of attorneys' fees, as requested by Judge Seymore	1.80	711.00
11/13/2019	NES	Telephone conference(s) with Mendel to discuss approach to meeting with Seymore; discussing scope of alleged unauthorized/unequal distribution claims by Carl/Candy; review pleadings to confirm scope of complained of transactions; attend meeting with Mendel and Seymore as part of mediation process, provide Seymore with proposed settlement offer to convey to Carl, Candy and Carole	1.60	632.00
11/18/2019	NES	Receipt and review of Notice of Appearance filed by new counsel for Candy Curtis on 11/15/2019, receipt and review of multiple memorandum to and from Mendel and Mediator on 11/17/2019 and 11/18/2019 regarding Notice of Appearance and its potential impact on mediation; Investigate new counsel online (news articles, blog posts, etc.); telephone conference(s) with Mills Shirley to determine if attorney worked for Mills Shirley during time Mills Shirley represented Amy and Anita, telephone conference(s) with Court regarding previously filed Motion for Second Contempt; preparation and drafting of Notice of Hearing regarding same; communicate with Mendel regarding Motion for Second Contempt and proceeding with deposition notice to Curtis in accordance with recent e-mail to Curtis regarding same; preparation and drafting of memorandum to Bayless to determine if mediator has been in contact regarding settlement proposal, to determine if Bayless has any past interaction with new counsel; preparation and drafting of status memorandum to Amy regarding same; receipt and review of response from Bayless	1.40	553.00
11/18/2019	NES	Further communications with client in response to earlier update, including obtaining copies of November 2019 e-mails written directly to siblings by Candy and by Carole; conference call with Mendel and mediator (Seymore) - Seymore advises that despite Candy's retention of counsel, he has permission to still directly negotiate with Candy, discussing Seymore's evaluation of Joint Offer from Amy/Anita and fact that it was not fully presented to Candy, Carl or Carole, discussing parameters of how Seymore believes Joint Offer should be revised to make it more palatable to Candy (and Carl), confirm that Seymore's parameters have not been presented, agreed to or approved by Carl, Candy or Carole; post-call follow-up call with Mendel	1.60	632.00
11/18/2019	NES	Further discussions with Amy regarding issues raised in status memorandum, including receipt of recent e-mail string from Carole and Candy directly to other siblings; participate in Mediator's requested conference call with Mediator and Mendel to discuss response to Joint Offer, to discuss status of Mediator's alleged discussions with Candy, Carole and Bayless and his position of their respective positions - proposing his version of a settlement offer that he thinks others would accept, if Amy and Anita accept first - discussion regarding concerns about process in which Mediator is handling negotiations, attempt to	1.70	671.50

	explain further facts and law in light of Candy's efforts to justify the "logic" of her response to Joint Offer		
11/19/2019 NES	Receipt and review of e-mails from and between Mendel and Seymore from late-evening on 11/18/2019 in response to issues discussed during 11/18 conference call (including copy of handwritten letter from Nelva [REDACTED] that Candy is relying on to support her belief that she was not supposed to have a trustee over her money); Receipt and review of 57-page Bill of Review filed by Curtis (through new counsel, Schwager); preparation and drafting of response to Schwager regarding incorrect allegation of disingenuousness, providing proof/confirmation of truth of comments, requesting withdrawal of allegation, or clarification as to basis for same; consider content of Bill of Review, outline key points of same, noting glaring omission of any Curtis/Ostrom filed documents in federal court proceeding	2.20	869.00
11/20/2019 NES	Receipt and review of memorandum from mediator, Seymore, again stating belief that Candy/Carole have "litigation fatigue" and want to settle, providing written confirmation of key points of Candy's response to Joint Offer, as originally communicated by Seymore during conference call phone call of 11/18/2019, and advising that he will begin reading Bill of Review; preparation and drafting of response to Seymore with additional information pertaining to matters addressed in Bill of Review, discussing concerns as to whether mediation is being pursued in good faith; preparation and drafting of status report to client regarding above, suggesting that Candy's response as presented by Seymore be considered a "counter-offer"	0.80	316.00
11/20/2019 NES	Telephone conference(s) with Bayless in light of concerns that Seymore has not fully and completely presented terms of offers/counter-offers, confirm with Bayless that (per Bayless) terms of Amy/Anita's offer were not fully or accurately presented and that Candy's response was never presented to Bayless, discuss deal terms that were supposed to have been presented and Bayless' thoughts and perspectives regarding same; discuss concerns Bayless has regarding Vacek & Freed litigation (Motion for Sanction's filed against [REDACTED] incurred by Carl in pursuing same), discussing Candy's retention of counsel, potential impact on mediation and Bill of Review issues, advised by Bayless that during RICO case, Ostrom claimed to have papertrail to confirm remand was with Candy's knowledge and consent	1.20	474.00
11/22/2019 NES	Receipt and review of client's 11/20/2019 reply to memorandum of same date; receipt and review of memorandum from Seymore withdrawing as mediator; preparation and drafting of response to Seymore further to withdrawal and "clarifying" certain issues regarding concerns as to accuracy and completeness of presentation of offers and counteroffers; receipt and review of reply from Seymore confirming concerns; preparation and drafting of memorandum to Mendel summarizing 11/20/2019 telephone conference with Bayless	0.60	237.00
11/25/2019 NES	Telephone conference(s) with Bayless further to issues discussed during call of 11/20/2019 and per her request for same in light of 11/22/2019 communications with and from Seymore, discussing Bayless' understanding as to Carole's current state of mind and whether it may assist in negotiating a settlement as between Carl, Amy, Anita	0.80	316.00

Griffin & Matthews

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(281) 870-1124

January 31, 2020

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount
12/12/2019	NES Telephone conference(s) with Mendel, [REDACTED] [REDACTED] discussed issues to convey to court [REDACTED] [REDACTED] as to sanctions, as to Bill of Review, and as to prior mediation efforts via Seymore; confirm that Mendel had received Anita's 11/21/2019 spreadsheet, discuss how and when spreadsheet can be turned into offer to siblings - discuss Mendel thinking that [REDACTED] [REDACTED] should be made to Carl and Candy only versus presenting it to all siblings and allowing any interested sibling to agree to a fee. Candy to say 'no' make her realize she may be "last man standing."	0.30	118.50
1/10/2020	NES Prepare for hearing, travel to and attend hearing on Vacek & Freed's Motion to Appoint	2.40	948.00
1/13/2020	NES Preparation and drafting of memorandum to Mendel suggesting additional point to include in proposed Order following Friday's hearing; telephone conference(s) with Mendel regarding same, regarding draft settlement proposal and discussion whether to issue now or hold for mediation, discussing e-mail sent by Candy to Amy and Anita over the weekend and Mendel's conversation with Anita regarding same; preparation and drafting of memorandum to Amy in light of Candy's e-mail and Friday's hearing; preparation and drafting of memorandum to Candy's counsel (Schwager) regarding prior communications with Seymore post-withdrawal as mediator in light of content of Candy's e-mail	0.60	237.00
1/14/2020	NES Receipt and review of memorandum from client indicating preference to return to Seymore as mediator rather than Davidson; communicate with Mendel regarding similar instruction he received from Anita and next steps in terms of presenting same to other parties and counsel	0.20	79.00
1/16/2020	NES Receipt and review of additional filings by Candy (13-page Objection to First Supplemental Petition filed as to Vacek and Freed, and 17-page Answer to Original Counterclaims against Candy)	0.60	237.00
1/24/2020	NES Receipt and review of memorandum from client with copy of direct correspondence client received from Candy, and client's position regarding same	0.10	39.50
1/27/2020	NES Multiple memorandum to and from Bayless, Mendel and Schwager regarding mediation/Seymore/Davidson and Schwager's renewed request for forensic examiner in light of issues discussed with Court during hearing on 1/10/2020	0.20	79.00

1/29/2020	NES	Receipt and review of copies of accounting records being provided to parties by Mendel, receipt and review of copy of Farm appraisal, receipt and review of memorandum from Bayless indicating opposition to suggestion that Seymore be re-engaged as mediator, instead of Davidson	0.20	79.00
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Sub-total Fees: \$1,817.00

Expenses

12/12/2019		Parking - NES		8.00
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Sub-total Expenses: \$8.00

Payments

1/7/2020	Payment	#87908219	200.00	
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1/16/2020	Payment	#95205380	200.00	
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Sub-total Payments: \$400.00

Total Current Billing: \$1,825.00

Previous Balance Due: \$100,138.20

Total Now Due: \$101,963.20

		followed by receipt and review of memorandum from Judge Comstock with proposed Clarification Order and responses from C. Reed and C. Schwager approving same; telephone conference(s) with Mendel regarding concerns as to content of Clarification Order; preparation and drafting of draft response to Judge Comstock for review by Mendel; receipt and review of memorandum from Bayless expressing concerns about Clarification Order similar to those discussed with Mendel		
2/27/2020	NES	Further communications with Mendel and Bayless regarding response to be prepared to Court in light of issues with content of Court's proposed revised Order, culminating in Mendel issuing response and Court issuing revised Order following consideration, communicate with Mendel and Bayless following receipt of Court's executed, revised Order	0.80	316.00
3/13/2020	NES	Receipt and review of memorandum from Mendel to group regarding mediation and mediation dates, suggesting May 2020 mediation; receipt and review of memorandum from Carole questioning why May 2020 is being proposed, preparation and drafting of response to Carole; preparation and drafting of memorandum to Amy regarding same	0.20	79.00
3/14/2020	NES	Receipt and review of memorandum from Carole indicating she was served with Bill of Review; receipt and review of dates Carole is available for mediation; receipt and review of dates Amy is available for mediation; preparation and drafting of memorandum to all parties advising as to mediation availability	0.10	39.50
3/23/2020	NES	Receipt and review of memorandum from Schwager indicating intent to proceed with forensic examination of QBD documents; preparation and drafting of response inquiring as to potential agreements to be reached if examination supports execution by Nelva	0.10	39.50
3/24/2020	NES	Receipt and review of memorandum from Schwager modifying request for forensic examination of QBD, now stating Curtis wants to see it herself, first; Internal firm communication regarding process server coming to office to attempt service on Mendel and Anita at our office, as well as service of Amy through Firm	0.20	79.00
4/24/2020	NES	Review various communications and spreadsheets pertaining to potential settlement proposals between 4/13 and 4/23 in preparation for conference call with Mendel, Amy and Anita	1.20	474.00
4/24/2020	NES	Participate in conference call with Mendel, Amy and Anita to discuss approach to settlement, b [REDACTED] a [REDACTED], discuss Court's mediation order, address request by Schwager for call from Mendel and picture of original QBD signature	1.60	632.00
4/27/2020	NES	Receipt and review of copy of photograph of original QBD signature page from Anita, preparation and drafting of response to Mendel regarding plan for presenting same to Schwager; receipt and review of memorandum from Amy containing latest e-mail from Candy with attachment and demand for \$100,000 distribution; preparation and drafting of response to Amy regarding same	0.30	118.50

Sub-total Fees: \$2,804.50

Payments

2/18/2020	Payment	#2914801	200.00
3/18/2020	Payment	#10275379	200.00
4/17/2020	Payment	#17515994	200.00

Sub-total Payments: \$600.00

Total Current Billing: \$2,804.50

Previous Balance Due: \$101,363.20

Total Now Due: \$104,167.70

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
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June 30, 2020

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount
5/4/2020	NES	0.40	158.00
Receipt and review of draft of settlement proposal from Mendel as per conference call of 4/24/20; follow-up call with Mendel regarding same, discussing photograph of original QBD and joint approach to presentation of proposal and photograph; preparation and drafting of memorandum to Amy addressing above			
5/12/2020	NES	0.40	158.00
Telephone conference(s) with client regarding certain issues/questions about next steps; preparation and drafting of memorandum to Mendel regarding mediation dates; receipt and review of memorandum from Mendel to mediator (and group) indicating mediation should be scheduled for 6/25/2020; preparation and drafting of memorandum to client addressing above			
5/12/2020	NES	0.60	237.00
Telephone conference(s) with Mendel and Bayless to discuss approach to mediation to determine the ground rules for mediation of mediation to assist in negotiating as a group "against" Candy Bayless to provide outline of "what it would take" for her clients to settle/resolve; discuss possible approach to mediation relative to claims against V&F			
5/13/2020	NES	1.10	434.50
Preparation and drafting of memorandum to client to address client's previous question about attorney's fees and strategies for recovering same as part of mediation process; preparation and drafting of memorandum to Mendel, addressing similar topics from perspective of determining how to position demand for fees as between Carl Candy, Trust and Vacek & Freed ; begin sketching out ideas/issues to address in potential demand letter to Vacek & Freed			
5/26/2020	NES	1.80	711.00
Preparation and drafting of Version 1 of proposed draft demand letter to be issued as Confidential Settlement Offer to Vacek and Freed, from Amy & Anita, for review and comment by Mendel			
5/27/2020	NES	7.20	2,844.00
Initiate preparation and drafting of first 12 pages of Confidential Mediation Statement; preparation and drafting of memorandum to Mendel regarding same			
5/28/2020	NES	2.60	1,027.00
Continue drafting of Confidential Mediation Statement, including further research on forfeiture clauses and Trust Code provisions relating to forfeiture clauses; receipt and review of Mendel's comments to Version 1 of demand letter to Vacek & Freed, revise same to reflect Mendel's comments and additional revisions; preparation and drafting of memorandum to Amy with draft of demand and additional information			

negotiations in light of failed mediation; discussion regarding status of case filings in various courts; discussion regarding efficacy of global settlement versus settlement with limited parties; discussion regarding case evaluation against Candy and likelihood of success; discussion regarding collaboration with adverse; discussion regarding impediments to settlement ~~being academic complexities and attorney fees~~; discussion regarding feasibility of segregating work and requesting court-ordered payment of fees.

6/30/2020	NES	Receipt and review of memorandum from Amy with revised position regarding settlement following issues discussed during call of 6/29/20; advise Mendel of same to allow Mendel/Anita to proceed with preparation of potential settlement offers to group; receipt and review of copy of communications with and from Judge Davidson to confirm court-ordered mediation occurred; preparation and drafting of "Certificate of Conference" memorandum to Schwager to address issues with new lawsuit (Petition to Enforce) and suggest agreed compromises; receipt and review of response from Schwager addressing no issues actually raised in original request	0.80	316.00
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Sub-total Fees: \$15,253.00

Payments

5/19/2020	Payment	#35886866	200.00
6/19/2020	Payment	#43217311	200.00

Sub-total Payments: \$400.00

Total Current Billing:	<u>\$15,253.00</u>
Previous Balance Due:	\$103,767.70
Total Now Due:	<u>\$119,020.70</u>

Griffin & Matthews

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August 24, 2020

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount
7/1/2020	NES	0.70	276.50
Receipt and review of copy of communications with Davidson, Mendel and Judge Comstock regarding mediation being completed; receipt and review of memorandum with two proposed settlement options prepared by Anita as per call of 6/29/2020; communicate with Bayless and Mendel regarding tolling agreement [REDACTED], receipt and review of latest communication from Candy personally to Amy and Anita with "final offer" from Candy and communicate with Amy, Anita and Mendel regarding how communication from Candy impacts previously discussed plan			
7/1/2020	NES	3.20	1,264.00
Research issues regarding Petition to Enforce Foreign Judgment, including case law and article written by Judge in connection with determining options for responding to Petition, initiate preparation of Motion to Transfer, Original Answer and Motion for Sanctions based on Candy's filing of Petition to Enforce and research suggesting Petition not properly filed			
7/3/2020	NES	0.10	39.50
Receipt and review of memorandum between Bayless and Mendel, regarding Bayless' draft of proposed extension of tolling agreement, regarding [REDACTED] [REDACTED] regarding Candy claiming that offer has been made to purchase farm and Mendel's response			
7/6/2020	NES	2.60	1,027.00
Continue research and preparation of Motion to Transfer, Original Answer and Motion for Contempt/Sanctions			
7/7/2020	NES	0.90	355.50
Prepare for conference call with Amy, Anita and Mendel in light of various issues being discussed since conclusion of mediation; participate in conference call setting out plan for proceeding forward ([REDACTED] [REDACTED])			
7/13/2020	NES	1.60	632.00
Initiate preparation and drafting of various Motions being discussed with client and Mendel (transfer of district court proceeding to probate court; application for fees and motion to compel Curtis/Munson depositions)			
7/15/2020	NES	0.40	158.00
Receipt and review of various memorandum (24+) between Mendel and Bayless from 7/1 to 7/15 regarding tolling agreement extension, culminating in review and approval of proposed agreement			
7/20/2020	NES	0.60	237.00
Receipt and review of memorandum from G. Vie presenting copy of latest filing by Curtis into federal court (Judge Hoyt), styled as Ex Parte Motion for Relief; internal firm discussion regarding implications of filing			

Sub-total Payments: \$200.00

Total Current Billing: \$5,444.82

Previous Balance Due: \$118,820.70

Total Now Due: \$124,265.52

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

August 31, 2020

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees		Hours	Amount
8/4/2020	NES	0.10	39.50
Preparation and drafting of follow-up memorandum to Ostrom further to discovery requests issued and regarding upcoming hearings in Probate Court No. 4			
8/4/2020	NES	0.30	118.50
Receipt and review of Carl's Reply to Response to Motion for Summary Judgment			
8/5/2020	NES	0.40	158.00
Receipt and review of 12-page Response to Motion to Transfer with multiple attachments			
8/6/2020	NES	5.60	2,212.00
Preparation and drafting of Status Report and Request for Additional Relief for filing in connection with this afternoon's hearing; exchange multiple memoranda to and from Court and counsel regarding Status Report, including e-mails from Schwager suggesting a hearing on Ex Parte Motion is set in federal court on 8/07/2020; review federal court file to determine accuracy of Schwager's position; prepare for hearing on various pending Motions set for hearing (Vacek & Freed's Motion to Appoint Executor, Carl's Motion for Partial Motion for Summary Judgment, Candy's Motion for Protective Order, Co-Trustee's Motion to Compel Deposition), attend and participate in hearing on various Motions and issues addressed in Status Report, obtain "on the record" confirmation from Schwager that no hearing is set in federal court; post-hearing telephone conference(s) with Mendel to address plan for additional briefing on summary judgment issue, possible affidavit from testor ; communication and possible alignment with Vacek & Freed on specific issue of "question of law" on enforceability of QBD ; preparation and drafting of memorandum to Carole and to Schwager to discuss Carl's claim that all siblings who received Stock Transfers should return stock or cash equivalent			
8/6/2020	SSG	2.50	0.00
Work with NES and assist Mendel and NES in preparation for court hearing; discussion regarding minutes plan for court consideration not to be taken into position testimony, summary judgment issue ; attend hearing ; subsequent meeting with NES to discuss going forward matters			
8/7/2020	NES	1.10	434.50
Receipt and review of memorandum from C. Schwager in response to memorandum of 8/06/2020 regarding Carl's position on stock transfers; receipt and review of second memorandum from C. Schwager containing unidentified video seemingly in support of claims that Nelva's signatures on QBD were forged; receipt and review of third memorandum from C. Schwager demanding June 2020 accounting (as			

		semi-annual accounting); telephone conference(s) with Cory Reed in furtherance to instructions given by Judge during hearings of 8/6/2020, discussing possible coordination of briefing/additional briefing in response to Carl's Motion for Partial Summary Judgment; preparation and drafting of status report to client addressing 8/6/2020 hearing, video received and next steps		
8/10/2020	NES	Continued research regarding issues pertaining to Statutory Bill of Review and regarding Ex Parte Motion in federal court, particularly on issue of "fraud on the court", preparation and drafting of Original Answer and Affirmative Defenses to Bill of Review, including memorandum to Mendel to determine if Answer is to be filed by both Amy and Anita, or just Amy due to date of service on Amy	2.80	1,106.00
8/10/2020	NES	Initiate preparation and drafting to Response to Ex Parte Motion	1.40	553.00
8/11/2020	NES	Continue efforts in relation to responding to Ex Parte Motion including review of docket reports from various Brunsting cases and assorted transcripts, pleadings and orders relative to same, further consideration of Fraud on the Court standards, continued drafting of Response to Ex Parte Motion; review communications between Mendel, Court, Bayless and other parties relative to proposed Orders stemming from recent hearing in Probate Court No. 4; telephone discussion with Mendel regarding proposed Orders and current status of/approach to Response to Ex Parte Motion	7.60	3,002.00
8/12/2020	NES	Completion of Version 1 of Response to Ex Parte Motion; together with memorandum to Mendel to obtain input and approval of content	4.70	1,856.50
8/13/2020	NES	Resume preparation of Response based on new arguments considered since completing draft of 8/12/2020, add sections required by Judge Hoyt per local rules, adjust content to fit within page limitations; prepare exhibits in support of Response; multiple discussions with Mendel further to finalizing same; preparation and drafting of proposed Order addressing relief requested in Response; preparation and drafting of memorandum to client to provide copy of Response and discuss same; receipt and review of memorandum from Mendel to confirm filing of Response	4.20	1,659.00
8/14/2020	NES	Receipt and review of copies of revised Orders as executed by Court pertaining to Curtis deposition, Carl's Motion for Summary Judgment and Vacek & Freed's Motion to Appoint; preparation and drafting of memorandum to Schwager (and group) in light of Order regarding deposition; preparation and drafting of memorandum to Bayless, Reed and Carole Brunsting regarding filings in Federal Court with Judge Hoyt; communicate with client regarding her review of Response to Ex Parte Motion and discussion regarding contempt of court; receipt and review of memorandum from Anita with follow-up from Mendel regarding Farm lease and tenant requesting reduction of same	0.30	118.50
8/28/2020	NES	Preparation and drafting of Reply to Curtis' Response to Motion to Transfer; preparation and drafting of proposed Order Granting Motion to Transfer/Denying relief requested by Curtis in Curtis' Response; Meeting with Mendel further to various outstanding issues -- proceeding with Notice of Deposition of Curtis in light of Court's order and non-response to proposed dates from Schwager; discussing status of	5.20	2,054.00

revised response to Carl's Motion for Summary Judgment; receipt and review of new federal court filing by Curtis (Emergency Motion to Re-Open Docket); communicate with Mendel and Bayless regarding possible means of litigation relating to Curtis' filing and continuing challenges to Probate Court No. 4's jurisdiction

8/31/2020	NES	Receipt and review of direct memorandum from C. Curtis refusing to appear for deposition as noticed by Mendel pursuant to Court's Order; preparation and drafting of memorandum to Schwager (and all counsel) forwarding memorandum to confirm whether representation still exists and whether Schwager was aware of or condones refusal to appear; receipt and review of memorandum from Anita regarding potential new lease at lower terms and whether Court-approval would be required; receipt and review of response from Mendel and preparation and drafting of reply to Mendel, Amy and Anita; telephone conference(s) with Mendel to discuss these issues as well as strategy for addressing Curtis' Emergency Motion to Re-Open Docket; review 5th Circuit opinion on "probate exception" in light of Curtis' repeated reference to same as basis for challenging Probate Court No. 4's jurisdiction	0.70	276.50
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Sub-total Fees: \$13,588.00

Expenses

Photocopies	4.93
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Sub-total Expenses: \$4.93

Payments

8/18/2020	Payment	#41309168	200.00
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Sub-total Payments: \$200.00

Total Current Billing: \$13,592.93

Previous Balance Due: \$124,065.52

Total Now Due: \$137,658.45

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

February 28, 2021

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
etal.

Professional Fees			Hours	Amount
9/1/2020	NES	Receipt and review of response from Schwager indicating that 8/31/20 memorandum from Curtis should be ignored, and that deposition will proceed per Court's Order; preparation and drafting of follow-up to Ostrom as Ostrom did not respond to discovery [REDACTED]	0.10	39.50
9/10/2020	SSG	Assist in preparation for Federal Court telephonic hearing; work on responsive pleadings with NES and Mendel	1.90	0.00
9/15/2020	NES	Telephone conference(s) with Mendel regarding issues to discuss with Carole during Mendel's upcoming call with Carole; begin preparations for Curtis deposition; receipt and review of copy of communications between Mendel and Brunsting siblings related to recent and current accountings, following issues discussed with Judge Hoyt during recent hearing; receipt and review of memorandum from Mendel summarizing his call with Carole	1.80	711.00
9/30/2020	NES	Receipt and review of copy of Judge Hoyt's Order denying Curtis' Ex Parte/Fraud on the Court Motion; meeting with SSG regarding same and discussing Certificate of Non-Appearance procedure; telephone conference(s) with Mendel to address next steps in light of Judge Hoyt's Order, including decision to prepare 1st Supplement to Motion to Transfer/Vacate (pertaining to district court proceeding domesticating the preliminary injunction); preparation and drafting of draft of proposed 1st Supplement for review and comment by Mendel; prepare outline of talking points for Certificate of Non-Appearance; conduct Zoom deposition/obtain Certificate of Non-Appearance	2.50	987.50
10/8/2020	NES	Telephone conference(s) with Trustees and Mendel regarding various issues, including recent communications from Carole, next steps following Judge Hoyt's ruling and Candy's non-appearance for deposition, discussing contact with Schwager, status of Carl's Motion for Summary Judgment and implications of same	0.50	197.50
10/9/2020	NES	Telephone conference(s) with Schwager to address whether Candy has reevaluated any portion of the case in light of Judge Hoyt's rulings, discuss attorney's fee issues and possible path forward; preparation and drafting of memorandum to co-trustees and Mendel regarding same	0.90	355.50
10/20/2020	NES	Telephone conference(s) with Carole Brunsting regarding various topics, including Carole Brunsting's recent direct communications with her siblings (Candy and Drina/Carl) and/or their attorneys; preparation and drafting of memorandum to client with cc to Mendel summarizing	1.20	474.00

		steps		
1/6/2021	NES	Receipt and review of memorandum from Mendel with copy of potential updated settlement proposal to be discussed with Amy and Anita, evaluate same, and prepare response to Mendel with initial thoughts as to content of offer and other issues to consider regarding same	0.40	158.00
1/12/2021	NES	Meet and confer with Mendel regarding settlement proposal prepared by Anita, in preparation for conference call to discuss same with Amy and Anita; preparation and drafting of memorandum to Amy and Anita identifying issues to be addressed during call; receipt and review of preliminary response from Anita regarding same	1.40	553.00
1/13/2021	NES	Conference call with Mendel, Amy and Anita to discuss various aspects of plan for pursuing potential settlement offer	1.20	474.00
2/3/2021	NES	Receipt and review of multiple memorandum regarding farm appraisal and settlement from 2/01/21 to 2/03/21	0.10	39.50
2/9/2021	NES	Receipt and review of copy of Curtis' Appellate Brief and proposed record excerpts	0.60	237.00
2/10/2021	NES	Receipt and review of Notice from 5th Circuit regarding deficiencies in Curtis' Brief	0.10	39.50
2/12/2021	NES	Multiple communications between 2/8/21 and 2/12/21 further to preparation and content of new settlement offer and issues to be considered in regard to same	0.60	237.00
2/18/2021	NES	Receipt and review of Notice from 5th Circuit regarding Curtis Appeal and "proposed sufficient record excerpts"	0.10	39.50
2/26/2021	NES	Communicate with Mendel, Carole, Amy and Anita regarding status of new settlement offer	0.30	0.00
			Sub-total Fees:	<u>\$5,885.50</u>

Payments

9/18/2020	Payment	#48324035	200.00
10/19/2020	Payment	#55280451	200.00
1/4/2021	Payment	#62797417	200.00
1/5/2021	Payment	#69689114	200.00
1/20/2021	Payment	#76704774	200.00
2/23/2021	Payment	#83887718	200.00
			Sub-total Payments: <u>\$1,200.00</u>

Total Current Billing:	<u>\$5,885.50</u>
Previous Balance Due:	\$136,458.45
Total Now Due:	<u>\$142,343.95</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281)870-1124

March 31, 2021

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
3/1/2021	NES	Multiple communications regarding issues pertaining to attorney's fees relative to new settlement offer being worked on by Amy and Anita	0.10	39.50
3/3/2021	NES	Discussions (e-mail) from 3/02/21 and 3/03/21 further to attorney's fees and new settlement offer, as well as plan for addressing Curtis' 5th Circuit brief	0.10	39.50
3/3/2021	NES	Receipt and review of various communications further to next steps in finalizing new offer; preparation and drafting of potential letter/e-mail to be sent by Anita to parties; receipt and review of memorandum from Anita in response addressing attorney's fees	1.40	553.00
3/4/2021	NES	Preparation and drafting of memorandum directly to client in regard to settlement proposal issues raised by Anita in memoranda if 3/3/2021	0.40	158.00
3/4/2021	NES	Telephone conference(s) with Mendel regarding 3/3/21 memorandum from Anita, how it implicates settlement discussions relative to Carole's deadline and other factors; discussing appellate briefing extensions and deadlines relative to settlement discussions and possible issues to address in response brief	0.40	158.00
3/5/2021	NES	Receipt and review of memorandum in response to draft of possible phrasing of settlement offer; preparation and drafting of reply in light of same	0.60	237.00
3/5/2021	NES	Telephone conference(s) with Mendel in regard to various issues stemming from latest communications about settlement offer, receipt and review of multiple memorandum among group to finalize same, culminating in Anita issuing settlement offer to siblings and Mendel issuing settlement offer to Bayless and Schwager	0.20	79.00
3/8/2021	NES	Receipt and review of Curtis's 3/05/21 response to settlement offer, preparation and drafting of follow-up memorandum to Schwager regarding same; receipt and review of communications from Schwager and Curtis on 3/07 and 3/08, resulting in follow-up memorandum to Schwager seeking clarification and status to Amy and Anita as to their impressions of Candy's communications and how they impact further negotiations and next steps/options in probate court	0.70	276.50
3/9/2021	NES	Receipt and review of response from client as to issues addressed on 3/8/21; receipt and review of memorandum from Schwager, together with follow-up communications with client and Mendel, as well as review of draft of proposed Motion to Extend Time and comments/approvals	0.60	237.00

		from Schwager & Curtis		
3/10/2021	NES	Multiple, various communications by and between Curtis and Mendel, with client, and with Curtis pertaining to settlement negotiations and extension of 5th Circuit briefing deadline	0.60	237.00
3/12/2021	NES	Receipt and review of various memorandum, including counter-offers, by and between parties and counsel from 3/10/2021, Exchange follow-up memorandum to client, Anita, Mendel and Curtis as to various issues addressed in various 3/10/21 memorandum	1.40	553.00
3/15/2021	NES	Receipt and review of 3/12/21 late-afternoon/evening memoranda and preparation and drafting of responses, receipt and review of memoranda from 3/13/21 to 3/14/21 and preparation and drafting of memorandum to Trustees and Mendel in regard to same	0.60	237.00
3/17/2021	NES	Communicate with all parties per request; work on comparison and evaluation of all responses/offers/counter-offers made since Trustees' offer of 3/05/21; Internal discussion with SSG in light of completed analysis and implications of same	3.20	1,264.00
3/18/2021	NES	Perform further work on comparison and contrasting of settlement offers further to preparation of potential counter-offer; telephone conference(s) with Amy regarding evaluation of settlement offers, communicate directly with Carole regarding sale of farm; multiple communications with Amy, Anita and Mendel regarding above	2.40	948.00
3/24/2021	NES	Conference call with Amy, Anita and Mendel to discuss parameters of counter-offer, to confirm plan to complete and file appellate response, to "pause" summary judgment filings to determine outcome of settlement efforts	0.70	276.50
3/25/2021	NES	Preparation and drafting of draft of proposed Counter-Offer based on issues discussed during call of 3/24/2021, with memorandum to Amy, Anita and Mendel regarding same	0.70	276.50
3/26/2021	NES	Multiple communications to and from Amy, Anita and Mendel further to content of proposed Counter-Offer, questions, revisions and approval to issue same as of 3/29/21	0.80	316.00
3/29/2021	NES	Preparation and drafting of memorandum to all siblings/counsel presenting counter-proposal, with follow-up memorandum specifically to C. Curtis	0.30	118.50
3/30/2021	NES	Receipt and review of/preparation and drafting of various memorandum from Candy, from Carole, from Bayless, with Schwager and to and from Amy, Anita and Mendel in regard to Counter-Proposal of 3/29/2021	0.60	237.00
			Sub-total Fees:	<u>\$6,241.00</u>

Payments

3/18/2021	Payment	#90646952	200.00
			Sub-total Payments: <u>\$200.00</u>

Total Current Billing:	<u>\$6,241.00</u>
Previous Balance Due:	\$142,143.95
Total Now Due:	<u>\$148,384.95</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

July 31, 2021

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
4/1/2021	NES	Preparation and drafting of memorandum to siblings in response to and addressing questions raised in 3/30/2021 memorandum from Bayless and from Carole	0.40	158.00
4/5/2021	NES	Receipt and review of various memorandum/responses from siblings/siblings' counsel between 4/01/2021 and 4/05/2021 in response to Counter-Proposal; preparation and drafting of memorandum to Amy, Anita and Mendel in regard to evaluation of same and possible next steps	0.40	158.00
4/19/2021	NES	Communicate with Mendel and Trustees regarding hearings prior to representation; receipt and review of draft of Appellate Brief from Mendel and prepare redlines, revisions and comments to pages 9-42	2.20	869.00
4/20/2021	NES	Communicate with Mendel and Co-Trustees regarding filing of Response to Candy's Appellate Brief, next steps with 5th Circuit and next steps in Probate Court	0.20	79.00
4/28/2021	NES	Multiple memoranda between 4/26/2021 and 4/28/2021 including receipt and review of memorandum from Carole, followed by multiple memoranda to and from Mendel and co-trustees regarding response to Carole and next steps	0.30	118.50
5/6/2021	NES	Receipt and review of multiple memorandum to and from parties, court and counsel as well as with co-trustees between 4/29/2021 and 5/06/2021, culminating in discussion about recent Candy e-mail ("it's getting worse by the minute") and questions from co-trustee's regarding same	0.30	118.50
5/6/2021	NES	Initiate preparation and drafting of Motion for Summary Judgment, with communications regarding same to and between Mendel and Co-Trustees	0.80	316.00
5/10/2021	NES	Multiple memoranda to and from Mendel, Carole, Court and Bayless to begin efforts to obtain trial setting	0.20	79.00
5/19/2021	NES	Receipt and review of various memorandum from 5/17/2021 to 5/19/2021 between and among Court, Bayless, Carole and Mendel regarding issue of trial date and Carole potentially wanting to continue settlement negotiations	0.20	79.00
5/24/2021	NES	Continue preparation of Motion for Summary Judgment; telephone conference(s) with Mendel to discuss strategy for Status Conference;	4.60	1,817.00

		participate in Status Conference; review pleadings/orders to gather materials requested by Court; preparation and drafting of memorandum to Court addressing requested materials; receipt and review of partial response from Court with copies of working draft of Docket Control Order and court's preferred Pre-Trial Order template; preparation and drafting of proposed Order relative to Motion to Transfer and/or Motion to Vacate and e-file same		
5/25/2021	NES	Preparation and drafting of follow-up memorandum to Court in regard to Notice of Submission; preparation and drafting of follow-up memorandum to Bayless and Mendel in regard to Docket Control Order dates	0.10	39.50
6/2/2021	NES	Continued preparation of Motion for Summary Judgment by initiating section pertaining to fiduciary breach claims during period Amy and Anita served as Co-Trustees	1.20	474.00
6/4/2021	NES	Multiple communications between and among parties/parties counsel between 5/31/2021 and 6/04/2021 pertaining to various issues - efforts to secure agreed docket control order, additional communications about or parties perspectives regarding settlement, Carole's counterclaim	0.40	158.00
6/4/2021	NES	Receipt and review of "Letter of Submission" with attachments filed by Curtis relative to Bill of Review	0.20	79.00
6/10/2021	NES	Multiple communications between and among Bayless, Carole, Mendel and Amy/Anita between 6/07/2021 and 6/10/2021 pertaining to various issues - further discussions regarding settlement, Carole's current positions regarding case related matters, Court's comments and commentary during status conference of 5/24/2021	0.80	316.00
6/11/2021	NES	Receipt and review of memorandum from Anita and Amy with copy of latest direct correspondence from Curtis to siblings	0.20	79.00
6/21/2021	NES	Receipt and review of 5th Circuit Opinion affirming Hoyt rulings; communicate with client regarding same	0.30	118.50
6/29/2021	NES	Telephone conference(s) with Bayless and Mendel on various issues including 5th Circuit opinion and implications of same, and about Bill of Review; receipt and review of memorandum from clients requesting conference call on certain identified topics	0.60	237.00
7/1/2021	NES	Receipt and review of Carl Brunsting's Original Answer to Curtis' Bill of Review	0.20	79.00
7/6/2021	NES	Conference call with Mendel, Amy and Anita addressing issues raised in memorandum of 6/29/2021	0.80	316.00
7/9/2021	NES	Receipt and review of multiple memorandum between 7/05/2021 and 7/09/2021 pertaining to Accounting information	0.20	79.00
7/13/2021	NES	Receipt and review of Carl's Brief in Support of Denial of Curtis's Bill of Review	0.40	158.00
7/13/2021	NES	Receipt and review of Notice of Mandate issued by 5th Circuit Court of Appeals in relation to Opinion of 6/21/2021	0.10	39.50
7/15/2021	NES	Receipt and review of Curtis's 38-page Reply to Carl's Response to Bill	0.60	237.00

		of Review		
7/16/2021	NES	Receipt and review of Curtis' Supplemental Reply to Carl's Answer/Response to Bill of Review	0.20	79.00
7/19/2021	NES	Receipt and review of Curtis's Reply to Co-Trustees' Response to Bill of Review	0.30	118.50
			Sub-total Fees:	<u>\$6,399.00</u>

Expenses

3/24/2021		Premier Global, Inc		10.02
5/27/2021		Harris County Court		25.72
			Sub-total Expenses:	<u>\$35.74</u>

Payments

4/19/2021	Payment	#97575750	200.00	
5/21/2021	Payment	#4443682	200.00	
6/18/2021	Payment	#11106258	200.00	
7/20/2021	Payment	#17818393	200.00	
			Sub-total Payments:	<u>\$800.00</u>

Total Current Billing:	<u>\$6,434.74</u>
Previous Balance Due:	\$147,584.95
Total Now Due:	<u>\$154,019.69</u>

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

August 31, 2021

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
etal.

Payments

8/23/2021	Payment	#36193922	200.00
Sub-total Payments:			<u>\$200.00</u>

Total Current Billing: \$0.00

Previous Balance Due: \$153,819.69

Total Now Due: \$153,819.69

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
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(281) 870-1124

September 30, 2021

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
etal.

Professional Fees			Hours	Amount
9/1/2021	NES	Resume and continue preparation and drafting of Motion for Summary Judgment	4.80	1,896.00
9/2/2021	NES	Continued drafting of Motion for Summary Judgment including updated case law research on no contest provisions and incorporation of research results into Motion	3.20	1,264.00
9/28/2021	NES	Receipt and review of various memorandum between 9/9 and 9/28 regarding Anita questions about easement and possible new mediation, relative to summary judgment culminating with 9/28 memorandum from Amy requesting that preparation of summary judgment continue	0.20	79.00
			Sub-total Fees:	<u>\$3,239.00</u>

Payments

9/22/2021	Payment	#42414828	200.00
			Sub-total Payments: <u>\$200.00</u>

Total Current Billing:	<u>\$3,239.00</u>
Previous Balance Due:	\$153,619.69
Total Now Due:	<u>\$156,858.69</u>

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
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(281)870-1124

January 31, 2022

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Payments

10/18/2021	Payment	#49241855	200.00
1/4/2022	Payment	#55999488	200.00
1/7/2022	Payment	#62042045	200.00
1/19/2022	Payment	#68710552	200.00

Sub-total Payments: \$800.00

Total Current Billing: \$0.00

Previous Balance Due: \$156,058.69

Total Now Due: \$156,058.69

Federal Tax ID # 76-0535052

Griffin & Matthews

1155 Dairy Ashford, Suite 300
Houston, TX 77079
(281) 870-1124

February 28, 2022

Ms. Amy R. Brunsting
2582 Country Ledge Drive
New Braunfels, TX 78132

Matter ID: 1789-001

Brunsting, Amy R. - Carl H. Brunsting v. Anita K. Brunsting,
et al.

Professional Fees			Hours	Amount
10/5/2021	NES	Preparation and drafting of memorandum to Mendel, Amy and Anita with copy of "work-in-progress" draft of summary judgment, explaining approach to completion of remaining content, with multiple follow-up memorandum regarding request for status conference	0.10	39.50
10/13/2021	NES	Conference call with Amy, Anita and Mendel to address comments and strategies relative to completion of summary judgment, possible return to mediation and farm issues	0.90	355.50
10/15/2021	NES	Receipt and review of Carl's Answer to Amy & Anita's Counterclaim	0.20	79.00
10/15/2021	NES	Receipt and review of Carl's Fourth Supplement to First Amended Petition	0.20	79.00
10/15/2021	NES	Receipt and review of voluminous filing by Curtis - Addendum to Second Amended Complaint and Motion for Summary Judgment and Declaratory Judgment with exhibits	0.60	237.00
10/15/2021	NES	Receipt and review of Curtis's 10/15/2021 Answer to Amy & Anita's Counterclaim (with exhibits)	0.30	118.50
11/4/2021	NES	Telephone conference(s) with S. Mendel in regard to this morning's upcoming Status Conference (initiated by Vacek & Freed), attend and participate in Status Conference, continued drafting and completion of proposed Motion for Summary Judgment together with memorandum to Amy, Anita and Mendel to present same, discuss timing for review, comment and filing	5.20	2,054.00
11/8/2021	NES	Receipt and review of Curtis's Designation of Experts (adopts Carl's Designation)	0.10	39.50
11/9/2021	NES	Receipt and review of memorandum from Court regarding options for summary judgment hearing, telephone conference(s) with S. Mendel regarding same and regarding Motion for Summary Judgment issues involving Carl and Candy and strategy for addressing same; preparation and drafting of memorandum to B. Bayless in regard to issues discussed with S. Mendel; preparation and drafting of proposed Order Granting Summary Judgment; preparation and drafting of Notice of Hearing, with follow-up memorandum to Court requesting in-person hearing (if allowed); preparation and drafting of memorandum to C. Reed regarding recently filed Motion for Summary Judgment as it relates to Vacek & Freed	1.60	632.00
11/10/2021	NES	Follow-up communications with C. Reed regarding summary judgment	0.10	39.50

	issues		
11/15/2021	NES	Receipt and review of Carl's Answer to Carole's Counterclaim	0.20 79.00
11/17/2021	NES	Preliminary review of Curtis's "Answer to Co-Trustees' Motion for Summary Judgment and Motion to Strike" with exhibits	0.40 158.00
11/18/2021	NES	Receipt and review of memorandum from Carole regarding Court denying Carl's Motion for Summary Judgment, review Court's file and Order signed, determine that it appears Court's ruling is only limited to QBD issue, apparently no ruling on disproportionate gifts/distributions by Anita while Nelva was alive	0.20 79.00
11/23/2021	NES	Receipt and review of memorandum from Anita regarding upcoming hearing on Co-Trustee's Motion for Summary Judgment and questions about hearing and about Court's denial of Carl's Motion for Summary Judgment based on comments from Carole; preparation and drafting of response to Amy, Anita and S. Mendel addressing same; preparation and drafting of follow-up memorandum to C. Reed to advise as to denial of Carl's MSJ	0.60 237.00
11/24/2021	NES	Communicate with S. Mendel regarding Mendel's 11/13/2021 conference call with Bayless	0.10 39.50
11/29/2021	NES	Receipt and review of Mendel's memorandum to Amy and Anita regarding latest discussions with Bayless and potential next steps in light of same; receipt and review of latest memorandum from Carole to Court and Court's response	0.20 79.00
11/30/2021	NES	Conference call with Mendel, Amy and Anita to address recent discussions with Bayless and potential severance/agreement on Motion for Summary Judgment as it relates to Carl	1.10 434.50
12/9/2021	NES	Telephone conference(s) with Mendel regarding strategy and approach to preparation of Reply, as well as Mendel undertaking preparation of objections to Curtis's MSJ exhibits; preparation and drafting of Version 1 of Reply for review and comment by Mendel	4.60 1,817.00
12/13/2021	NES	Complete preparation of Reply incorporating Mendel edits and proposed objections, additional content regarding attorney's fees and judicial economy, preparation and drafting of new/revised Order specific to Curtis only, with additional content to address "findings" as well as objections and Curtis's Motion to Strike; preparation and drafting of memorandum to Mendel to receive final input/approval as to content of Reply and revised Order	1.40 553.00
12/13/2021	NES	Communicate with Mendel regarding comments and questions about Reply and proposed Order, including potential revisions to same; update and finalize Reply and Order based on communications with Mendel; file same and provide copy to Amy and Anita	0.40 158.00
12/21/2021	NES	Confer with Mendel and Bayless on moving forward with severance and certificate of conference obligations regarding same	0.10 39.50
12/22/2021	NES	Communicate with B. Bayless regarding Bayless's evaluation of Reply to Curtis's MSJ Response, and additional steps to encourage timely consideration and granting of same	0.20 79.00
12/30/2021	NES	Receipt and review of copy of Carole's Emergency Motion for Distribution	0.30 118.50

and Supporting Affidavit

1/4/2022	NES	Receipt and review of multiple communications from Bayless, Mendel, Court, and C. Reed regarding implications of Emergency Motion filed by Carole and Court setting same for hearing; telephone conference(s) with Mendel to discuss Emergency Motion and strategy for responding; receipt and review of copy of memorandum from Mendel to Amy and Anita advising as to filing of Emergency Motion and receive initial responses to same from Amy and from Anita	0.80	316.00
1/5/2022	NES	Preparation and drafting of draft of Response to Emergency Motion, together with memorandum to Amy, Anita and Mendel addressing content and approach to same in light of various communications of 1/04/22	1.80	711.00
1/5/2022	NES	Receipt and review of responses from Amy and Anita indicating that Response should not be filed; telephone conference(s) with Mendel regarding same	0.10	39.50
1/6/2022	NES	Multiple communications with Mendel, Amy and Anita regarding Carole, Carole's Emergency Motion and Carole's most recent direct communications to Anita; discussing and reviewing draft of Motion to Sever; participating in hearing on Emergency Motion, receiving information from Carole per Court's instructions, preparing response to Carole and follow-up communications with Mendel, Amy and Anita regarding Court's order and funding of emergency distribution	1.90	750.50
1/7/2022	NES	Multiple memorandum to and from Court and Mendel relative to Motion to Sever, resulting in receipt and review of Notice of Hearing setting Motion to Sever for oral hearing	0.30	118.50
1/10/2022	NES	Receipt and review of copy of Court's executed Order approving distribution, as well as multiple memorandum to and from Court and Carole, and Mendel and Anita regarding Order and timeline/instructions for funding	0.20	79.00
1/20/2022	NES	Multiple memorandum to and from Court and parties between 1/19/2022 and 1/20/2022 regarding Court ordering Status Conference for 2/25/2022	0.20	79.00
1/27/2022	NES	Receipt and review of materials from Mendel pertaining to [REDACTED], and communicate with Mendel regarding same	0.30	118.50
2/1/2022	NES	Receipt and review of various memorandum from Anita and from Mendel with statements from Edward Jones, Bank of America and others, along with monthly accountings from July 2021 to December 2021	0.30	118.50
2/3/2022	NES	Receipt and review of various communications and proposals exchanged between Mendel and Bayless relative to agreement to modify existing Docket Control Order, culminating in review of final draft of same and preparation of memorandum to Mendel approving content and filing	0.30	118.50
2/8/2022	NES	Telephone conference(s) with Mendel and Bayless to address options and strategies for replying to Curtis's severance response points, to discuss next steps for Bayless to take in regard to contacting Carole and possibly settling Carl/Carole claims, discussing approach to upcoming hearing on Motion for Severance	1.10	434.50
2/9/2022	NES	Follow-up telephone conference(s) with Mendel and Bayless regarding	0.60	237.00

		Bayless's conversation with Carole and apparent agreements reached with Carole, further discussing issues to address in Reply/Replies to Curtis's severance response		
2/10/2022	NES	Telephone conference(s) with Mendel to address approach to severance hearing, address strategy to pursue if opportunity to argue summary judgment points presents itself; receipt and review of memorandum from Bayless indicating that Carole has retracted agreement; preparation and drafting of outline of key summary judgment points to raise during hearing on Motion to Sever if opportunity arises; preparation and drafting of memorandum to Mendel regarding same	1.20	474.00
2/11/2022	NES	Attend hearing on Water Easement issue and Motion to Sever (both granted) together with discussion with Court regarding status of Court's consideration of Motion for Summary Judgment and anticipated timeline for ruling on same; post-hearing communications with Mendel and with Mendel/Bayless	1.20	474.00
2/18/2022	NES	Multiple communications from Court and with Bayless regarding follow-up to Court granting Motion for Severance and status of Court's consideration of Motion for Summary Judgment	0.30	118.50
2/20/2022	NES	Review multiple memorandum to and from parties between 2/17/2022 and 2/20/2022 regarding first draft of proposed Joint Pre-Trial Order prepared by Mendel, including comments from Bayless and Carole, culminating in preparation and drafting of memorandum to Mendel with potential edits and revisions from Amy/Co-Trustee perspective	1.60	632.00
2/21/2022	NES	Continued review, discussion, editing and preparation of Joint Pre-Trial Order based on discussions with Mendel and comments/proposed content received from Bayless and Carole, culminating in filing of same by deadline with no input from Curtis; receipt and review of memorandum from R. Munson, post-deadline with Curtis's version of "Joint" Pre-Trial Order and Exhibit List; communicate with Mendel regarding Curtis's purported discovery responses from April 2015; preparation and drafting of Motion to Exclude Testimony and Evidence, for Sanctions and for Third Contempt as to Curtis	4.20	1,659.00
2/22/2022	NES	Multiple communications with Court and parties regarding hearing on Motion to Exclude and changes to schedule for various matters set for 2/24 and 2/25, moving all matters to hearing docket of 2/25/2022 at 3:00 p.m; Preparation and drafting of Notice of Hearing per Court's instructions; receipt and review of Version 1 of First Amended Pre-Trial Order from Mendel, preparation and drafting of response with comments, questions, and list of addition exhibits to include; receipt and review of proposed jury charge from Curtis	1.80	711.00
2/23/2022	NES	Meeting with Mendel further to preparations for Friday's Pre-Trial Conference and Hearing, discussing potential strategies for responding to Curtis's Pre-Trial Filings, discussing division of labor for continued preparations	2.20	869.00
2/23/2022	NES	Further communications with Court, Schwager and parties regarding Court's instructions of 2/22/2022 and matters set for consideration on 2/25/2022	0.60	237.00
2/24/2022	NES	Receipt and review of Curtis's Response to Motion for Sanctions; preparation and drafting of Reply to Curtis's Response; Communicate	4.40	1,738.00

with Mendel and Bayless regarding draft of First Amended Pre-Trial Order

2/25/2022	NES	Continued review, editing and discussion about First Amended Pre-Trial Order and approach to Status Conference regarding same; preparation and drafting of chart evaluating Curtis's Second Amended Petition relative to Curtis's proposed Jury Charge/Jury Questions for discussion at Status Conference; preparation and drafting of proposed Order Granting Sanctions; receipt and review of Curtis's Sur-Reply on Motion to Exclude/for Sanctions; gather additional exhibits and preparation and drafting of Response to Sur-Reply; prepare outline of key talking points for Motion to Exclude; attend hearing on Motion to Exclude/Status Conference, culminating in Court announcing that Co-Trustees' Motion for Summary Judgment against Curtis has been granted; post-hearing communications with Mendel and Bayless regarding implications of Summary Judgment being granted; receipt and review of copy of actual Order signed by Court relative to Summary Judgment	5.20	2,054.00
2/27/2022	NES	Multiple activities on 2/26 and 2/27 to begin addressing next steps following granting of Motion for Summary Judgment and instructions from Court further to 2/25/22 hearing, including - - Preparation and drafting of proposed Revised Order regarding transfer of Case No. 2020-35401 from 151th Judicial District Court to 401-Proceeding together with memorandum to all counsel and pro se parties forwarding draft for review and approval; preparation and drafting of memorandum to clients further to efforts to schedule call to discuss the granting of the Motion for Summary Judgment and next steps; multiple communications with Mendel and Bayless regarding Bill of Review proceeding (in the -404 matter) and potential implementation of second installment of Curtis's final fee; regarding Bayless's discovery of State Bar suspensions of Schwager ; review various memorandum from Schwager suggesting Motion to Reconsider will be filed relative to Summary Judgment, indicating potential interest in settlement versus appeal of Summary Judgment	1.80	711.00
2/28/2022	NES	Preparation and drafting of memorandum to Mendel and Bayless further to topics from memoranda of 2/26 and 2/27' preparation and drafting of memorandum to Amy and Anita regarding Schwager e-mail about "settlement"	0.20	79.00
2/28/2022	NES	Telephone conference(s) with Mendel further to issues raised in recent memorandum	0.40	158.00

Sub-total Fees: \$20,579.50

Expenses

12/14/2021	Photocopies	78.37
12/14/2021	Hour Messenger	39.04
Sub-total Expenses:		<u> \$117.41</u>

Payments

2/22/2022

Payment

#75176391

200.00

Sub-total Payments: \$200.00

Total Current Billing: \$20,696.91

Previous Balance Due: \$155,858.69

Total Now Due: \$176,555.60

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