

Candace L. Curtis
218 Landana Street
American Canyon CA 94503
(925) 759-9020

April 7, 2022

Via Email

State Bar of Texas
Office of the Chief Disciplinary Counsel
Attn: Mr. James Spencer, Investigator
4801 Woodway Drive, Suite 315-W
Houston, TX 77056

Dear Mr. Spencer:

Although most of Mr. Mendel's response is irrelevant to the IOLTA issue, it must be pointed out that there are some outright lies, misstatements of the facts, and citation errors that must be addressed.

It should be noted that, with the exception of the former Probate Court No. 4 Judge Christine Butts and Maureen McCutcheon (former attorney for both Anita and Amy Brunsting), none of the current attorneys (or Judge James Horwitz) are board certified in probate and estate planning. If they were, none of this should/would have happened, beginning with Bobbie Bayless, Carl's attorney, filing an ancillary matter to a closed probate. It should also be noted that our brother Carl was not competent, due to an extremely rare illness he suffered in July 2010.

The Federal Court Action 4:12-CV-00592 did not seek to compel an immediate distribution of my share, rather the claims brought by this pro se litigant are as follows: 1)breach of fiduciary duty to account and disclose unprotected trust documents, 2)constructive and extrinsic fraud, and (3) intentional infliction of emotional distress.

The Federal Court Action was dismissed under the probate exception on March 8, 2012, but then reversed and remanded by the Fifth Circuit Court of Appeals, published "Curtis V Brunsting 704 F.3d 406" (Exhibit A). The dismissal under the probate exception was **not affirmed**, as Mr. Mendel suggests. This is a false representation of a material fact. Moreover, Mr. Mendel did not attach this Fifth Circuit opinion, rather he cited a subsequent Fifth Circuit opinion. This is one of the many demonstrations of Mr. Mendel's incompetence and/or misconduct.

Upon remand from the 5th Circuit to the Southern District of Texas, I renewed my earlier application for a preliminary injunction, which was granted on April 9, 2013, with Memorandum of Preliminary Injunction filed April 19, 2013.

On September 3, 2013, I filed an Order to Show Cause and a hearing was had October 2, 2013. At the hearing Judge Kenneth Hoyt directed me to hire an attorney to complete discovery. I hired Mr. Jason Ostrom, who proceeded to file documents to improperly obtain "remand" to Harris

County Probate Court No. 4, from which it had not been removed, (Exhibit A) to be consolidated with a case already in Probate Court No. 4. Mr. Mendel was aware that there was a problem with the remand. (Exhibit D, page 9, 1/9/2015 BEF)

Mediation was held immediately after the transfer order was entered, with no results, as **ONLY** attorney fees were discussed. Shortly thereafter Maureen McCutcheon (Mills Shirley), Anita and Amy's attorney, moved to withdraw, citing conflict between the firm and their clients.

Subsequently The Mendel Law Firm was retained by Anita and Neal Spielman of Griffin Matthews was retained by Amy. Shortly thereafter this 6-year debacle begins. It should be noted that at least 90% of the filings in probate court have been "joint motions, responses, etc.", so the "conflict" remains unsubstantiated.

I terminated Mr. Ostrom as soon as he signed an agreement to consolidate my federal case with an ancillary probate case, against my explicit instructions. At that moment my lawsuit was converted into the very thing the Fifth Circuit agreed it was not and my separate identity disappeared.

The very first pleading filed by Mr. Mendel, December 5, 2014, raised In Terrorem claims and, consequently, I have been forced to defend myself against his various attacks since that time.

The 2016 Federal Court case (4:16-cv-1969) was a prediction of where we are now. All of the defendants, including Mr. Mendel, claimed it was a probate matter, probate case, probate proceeding, etc., all of which are synonymous with the administration of a decedent's estate. The probate was complete and had been closed prior to the filing of the first ancillary matter. The term "Harris County Tomb Raiders" came from a witness at the October 11, 2006 Texas Senate Hearings on Jurisprudence and the term "Probate Mafia" came from a paper written by Professor Peter Nicholas called "Fighting the Probate Mafia: A Dissection of the Probate Exception to Federal Court Jurisdiction. Complainant is not the only person who has ever suffered due to this type of egregious attorney conduct.

The true story, backed up by the record, is what actually happened in Probate Court No. 4 and, on its face, does appear to be "fantastical", "delusional", "clearly frivolous", and "borderline malicious". However, as unbelievable as it may sound, it **IS** what it looks like to this complainant.

I was sanctioned twice for trying to have the federal injunction enforced and, yes, I have failed to pay those sanctions, because I do not have the funds to do so. Since the amounts are below the review threshold, it would have been pointless to appeal. This war of attrition continues to the present time.

On February 25, 2022, at a scheduled pre-trial conference, visiting Judge Kathleen Stone signed Mr. Mendel's proposed order to disinherit me, without ever having a hearing, as well as an order denying my Bill of Review filed November 22, 2019. No pre-trial discussions were had and no notice was given for hearings on summary judgement.

SUMMARY OF THE ARGUMENT

Mr. Mendel represents Anita Brunsting, a purported co-trustee. Our sister Carole asked Anita for a distribution after her home was destroyed in Hurricane Harvey. Her house was paid off and she did not want to borrow money for the extensive repairs. The Brunsting Family Living Trusts terminated at the death of our Mother on 11/11/11 and was to be divided into five equal trust shares for the beneficiaries (which has never been done, even though the injunction required all income to be deposited into an appropriate account for the beneficiary).

Carole subsequently received an email from Mr. Mendel (Exhibit B) saying: “We received your request for a distribution and the request is denied. The reasons for denial include, but are not limited to, your articulated reasons are insufficient (her house being destroyed in the hurricane), Ms. Curtis’s allegations in the probate litigation, and the estate’s need to maintain liquidity for incurred debt (attorney fees)”.

Mr. Mendel continues to stand between Anita and the beneficiaries and continues to instruct her every move, including the instruction to transfer said mediation fees from the trust accounts to his IOLTA account. This violates Rule 1.14. Not only did he **not** file a motion for distribution of those trust funds, those funds belong to the individual beneficiaries, who are not all clients of Mr. Mendel’s. Carole and I did not have the funds to pay our shares and had no idea that Mr. Mendel was prepared to pay all of the fees. We attended the mediation anyway. The mediator spent about 5 minutes with each of us trying to find out how much of the \$537,000 in defense costs we were willing to pay. I have always agreed to pay 1/5 of the costs to administer the trust, which fees would normally be accrued as liabilities in the semi-annual accountings. This mediation failed as well, since the defendants’ position was their final answer. No negotiation. (Exhibit C)

“No harm means no foul” may be true **IF** one was following the rules for IOLTA accounts, but Mr. Mendel does not. Mr. Mendel does not follow a multitude of rules, does not follow the Estates Code or the Property Code, and does not follow deadlines in docket control orders. In fact, the disinheritance motion was filed after the window for those motions had already closed.

THE PRIMARY LITIGATION AND PARTIES

I retained Ms. Candice Schwager (pro bono) to avoid the vexatious litigant label and now she is being disrespected by Mr. Mendel as well. Ms. Schwager’s recent suspensions are irrelevant. Mr. Mendel’s inclusion of these facts is spiteful and are used as an ad hominem attack, in an effort to avoid confronting the facts and arguing the law. It is just more of the same inexcusable behavior.

THE UNDISPUTED FACTS

- 1) True
- 2) True, however, although I have not yet seen the engagement agreement with trustee Anita Brunsting, he does claim to represent her in her fiduciary capacities.
- 3) True for Mr. Mendel, but he represents a fiduciary and should be assisting her in performing her duties, which he is not. She is still in breach. It’s been more than 10 years and Mr. Mendel continues to stand between Anita and the beneficiaries.
- 4) See attorney fee section to follow

- 5) True, however, we cannot verify this claim without seeing the engagement agreement or other contract Mr. Mendel has with Anita.
- 6) True
- 7) True, but he did receive the \$8,500 and improperly deposited it into the IOLTA account, without receiving an order from the probate court to disburse the funds in the first place.

B. Anita Kay Brunsting and Amy Ruth Brunsting have assumed these positions based on a Qualified Beneficiary Designation and Testamentary Power of Appointment Under Living Trust Agreement dated August 25, 2010, which is not in evidence.

This document, which is also the basis of the disinheritance scheme, is not in evidence. There are three digitally altered QBDs and a dubious notary log, all of which have not been produced in their original form for examination by a forensic document examiner. The estate planning attorney's case notes do not reflect these documents being signed, rather the dates skip from August 17, 2010 to September 2, 2010. Our Mother told me on the phone she did no such thing and followed it up with a handwritten note saying it's "not true, you will get your share like everyone else". Mr. Mendel claims the note is not authenticated.

This QBD is void upon its face. Our Mother could only change things related to her own property and not our Father's property. Additionally, as a testamentary instrument it is void on its face for the absence of two disinterested witnesses. This is another demonstration of a lack of knowledge of the Estates Code by an attorney involved in this non-probate controversy.

I am also attaching a story about how to steal your family inheritance. (Exhibit E) This is exactly what Anita has done, starting with the estate planning attorney, who had a duty to our Mother, but began taking instructions from Anita the moment our brother Carl became ill (almost 12 years ago).

RESPONDENT'S ARGUMENT & AUTHORITIES

There was sufficient time to obtain a court order to distribute funds before this third ordered mediation that Mr. Mendel himself petitioned for on February 20, 2020. If the trust was authorized to disburse the funds, when the final distributions were made these fees would be allocated to the respective beneficiary. No beneficiary would have to approve this in writing.

It is doubtful that Anita instructed Mr. Mendel to do anything, rather it was Mr. Mendel who instructed Anita.

These excuses are just that, excuses for not following the rules or the laws of Texas.

If the funds belong to the client, when did Candace, Carole, Carl and Amy become clients of Mr. Mendel? Brunsting Family Trust funds had no business visiting Mr. Mendel's IOLTA account.

The transaction with Anita's payment after the fact is called "creative accounting", which is unacceptable to this accountant complainant. Based upon my understanding of the IOLTA procedure, Mr. Mendel should have deposited Anita's payment into his IOLTA account,

transferred the funds to his general operating account, and then issued the expense payment to Judge Davidson.

Why would I initiate further judicial proceedings against Anita in a court that I know has no jurisdiction? I was recently curious about IOLTA accounts when I ran across these bank records late last year in putting together a true accounting of the assets of the trusts, looking toward settlement.

ALLEGED MISAPPROPRIATION, HOSTAGE-TAKING, WITHHOLDING DISTRIBUTIONS

Hornbooks and Treatises are where I got my initial knowledge of fiduciary duties and beneficiary rights. My brother and I were usurped as trustees by documents created by the estate planning attorneys on the instructions of Anita, while our Mother was still alive. It is nonsensical for Mr. Mendel to carry on this quasi-litigation, in a court without competent jurisdiction, for more than 8 years, when he knew from the on-set there was a problem with the remand from federal court to Probate Court No. 4. (Exhibit D, page 9, 1/9/2015 BEF)

“The powers of the trustee/fiduciary are broad, and include the powers proscribed by the trust instrument itself”. What about the trustee’s duties, including, above all others, loyalty? Anita has exercised her perceived powers, yet has not performed one single duty required by the trust.

Complainant did not mislead this Tribunal by failing to disclose the temporary injunction, which **does not** prohibit beneficiary distributions. It is only germane in that the injunction prohibits payments for anything other than income taxes and tax preparation costs. A payment of the mediator’s fee for all parties from the trust corpus required a court order.

Mr. Mendel has excused the failure to obtain an order to pay the entire mediator fee from the trust, based on not having enough time to do so.

It should be noted that the modification Judge Butts made to the injunction was allowing the trustees to pay income taxes and tax preparation fees without further court order. They tried to sneak in other fees (farm management, etc.), but Judge Butts limited it to expenses related to income taxes. Since Judge Horwitz assumed the bench they have been paying farm management fees every year, without a court order.

Because the trustees have not followed the injunction, more than \$180,000 has been paid in income taxes for the farm, due to their failure to distribute the income as the injunction commanded. All of the beneficiaries know this. Why is Anita’s counsel not advising her to do her duty?

Yes, I attempted twice to obtain a distribution to pay the attorney I was directed to hire. Carl also applied for a distribution, as he had already **paid** \$250,000 to his attorney in hopes of getting his property, which he so desperately needed. All of these were denied based on Mr. Mendel’s assertion that the trust does not pay creditor-attorney fees, due to a spendthrift clause in the trust. Mr. Mendel, however, now ignores said provision and asserts an opposite position. (Exhibit D, Pgs. 21-22, 12/15/2014)

Can Mr. Mendel show me where “Curtis seems to want this Tribunal to compel Respondent to release or distribute her alleged share of Trust Assets”?

I have attached a copy of the Co-Trustee’s Counter-Offer Proposal of March 29, 2021, further known in my mind as the “extortion document”. (Exhibit C) Keeping in mind my offer to pay 1/5 of the amounts clearly related to trust administration (+/- \$50,000), this is their counter-offer assessing the entire balance of defense costs to the beneficiaries, arbitrarily based on a formula not provided.

“Redacted invoices supporting fees to be provided upon Acceptance.” We received the “redacted” invoices only recently, in response to a discovery demand that also included their respective engagement letters, which we did not receive. (Exhibit D) The redacted invoices are addressed in the following “C. Accrual of Fees”.

ACCRUAL OF FEES

Case Law

*We agree with appellants. "A party seeking attorney fees has a duty to segregate nonrecoverable fees from recoverable fees, and to segregate the fees owed by different parties." French v. Moore, 169 S. W3d 1, 17 (Tex.App.-Houston [1st Dist.] 2004, no pet.) (emphasis added); accord City of Austin v. Roberson, No. 13- 06-218-CV, 2008 WL 802315, at *3 (Tex. App.-Corpus Christi March 27, 2008, no pet.)*

To establish the reasonableness of attorney fees , a party seeking attorney fees must show that the fees resulted from suing the party sought to be charged with the fees on a claim that allows recovery of the fees . See Stewart Title Guar. Co. v. Sterling, 822 S. W2d 1. 10 (Tex. 1991). A party seeking attorney fees has a duty to segregate nonrecoverable fees from recoverable fees . See id. at 11.

A recognized exception to the segregation requirement exists when the attorney fees rendered are in connection with claims that are so interrelated that their prosecution or defense entails proof or denial of essentially the same facts. See id. The segregation requirement can also be waived if the opposing party fails to object to unsegregated proof See id. (reversal is required if "a party refuses, over objection, to offer evidence segregating attorney's fees ") (emphasis added); Osoba v. Bassichis, 679S.W2d 119, 123 (Tex.App. -[14th Dist.] 1984, writ refd n.r.e.)(where appellees offered no evidence segregating attorney fees , but appellant failed to object to their unsegregated proof of attorney fees , the issue was waived). Brown v. Comm. for Lawyer Disc, 980 S. W2d 675, 684-85 (Tex. App. 1998)

It should be noted that Mr. Mendel designated himself as an expert on attorney fees.

Trustee defense attorney fees **are not trust liabilities**. Only fees the trust incurs as part of trust administration are liabilities. Mr. Mendel’s fee statement is unconscionable and improper on its face.

Mr. Mendel disclosed his entire fee statement as a 168 page data dump and has ignored redaction rules by simply deleting information one is not allowed to redact in the first place. This is called “spoliation”. There are a few pages with actual redactions, but the essential information to indicate whether it is a legitimate charge to any one of the following matters listed at the top of the dump is non-existent:

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.

Mr. Mendel labeled the charges: Canda, Litiga, Trust, and Carl. The dump needs to be segregated by case, not all lumped together with these various labels. It should be noted that 1,556 line items are for Canda, 323 line items are for Litig, less than 266 items are for Carl, and less than 318 items are for Trust. Carl brought this litigation, so I fail to see how I would be responsible for causing the lion’s share of the bill under any scenario.

I expected to see monthly billing statements with payments and balance due reflected.

No payments by Anita were listed in the entire 168 pages. Does this mean she has never paid a penny until the mediation payment? If so, Mr. Mendel has “funded” Anita’s entire reign of terror to steal the family inheritance. I cannot prove this statement, as it is hearsay, but Anita has asserted numerous times that Mr. Mendel told her I would be disinherited for challenging “the trust” and would have to pay her fees.

None of the above-referenced captions are proper and do not match the pleadings. Complainant has not filed any “new” lawsuits in Probate Court No. 4. (412249-404) A Statutory Bill of Review is unique to probate, as in every other court the only Bill of Review available is equitable. This is another example of Mr. Mendel’s unfamiliarity with the Estates Code.

Complainant filed a registration of foreign judgement in the Harris County District Court, which Mr. Mendel is now attempting to move into Probate Court No. 4. This would be either misconduct or unfamiliarity with the law, or both.

Jurisdiction cannot be created by agreement or waiver. The court of original jurisdiction is the Southern District of Texas. If Mr. Mendel wants to argue to the contrary, I would ask that he verify his answer. (Exhibit C, Page 2 D, paragraph 1)

TEXAS DISCIPLINARY RULES OF PROFESSIONAL CONDUCT NOT FOLLOWED

A Lawyer's Responsibilities:

1. A consequent obligation of lawyers is to maintain the highest standards of ethical conduct. Mr. Mendel's constant bending and breaking of the rules, failure to know the laws his clients are bound by, and outright obfuscation of the facts in the cases he is involved in, is not ethical conduct by any stretch of the imagination.
2. As negotiator, a lawyer seeks a result advantageous to the client but consistent with requirements of honest dealing with others. Mr. Mendel's ethics fly out the door when dealing with others, especially this formerly pro se litigant.
3. In all professional functions, a lawyer should be competent, prompt and diligent. Mr. Mendel fails all three.
4. A lawyer should demonstrate respect for the legal system and for those who serve it, including judges, other lawyers and public officials. While it is a lawyer's duty, when necessary, to challenge the rectitude of official action, it is also a lawyer's duty to uphold the legal process. Unfamiliarity of the law prevents Mr. Mendel from upholding the legal process.
5. N/A
6. N/A
7. Mr. Mendel falls, to some degree, below the minimum standards in multiple areas.
8. Not only does he fall below the minimum standard, he has failed to provide aid in securing their observance by other lawyers.
9. It appears to complainant that Mr. Mendel has no conscience whatsoever.

Rules Mr. Mendel has violated: 1.04, 1.14, 2.01, 3.01, 3.02, 3.03, 3.04, 3.05, 4.01, 4.04, 8.04(a)1, 2, 3, 4, 8, 12, 8.04(b).

Please feel free to contact me if you have any questions or need further information.

Respectfully,



Candace Curtis
Complainant

EXHIBITS:

- A. 5th Circuit Opinion
- B. Carole's email
- C. Co-Trustees Counter-Offer
- D. Mendel's Billing Statement
- E. How to Steal Your Family Inheritance

EXHIBIT A

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT**

United States Court of Appeals
Fifth Circuit

FILED

January 9, 2013

Lyle W. Cayce
Clerk

No. 12-20164

CANDACE LOUISE CURTIS,

Plaintiff-Appellant

v.

ANITA KAY BRUNSTING; DOES 1-100; AMY RUTH BRUNSTING,

Defendants-Appellees

Appeal from the United States District Court
for the Southern District of Texas

Before HIGGINBOTHAM, SMITH, and ELROD, Circuit Judges.

PATRICK E. HIGGINBOTHAM, Circuit Judge:

This appeal concerns the scope of the probate exception to federal subject-matter jurisdiction in the wake of the Supreme Court's decision in *Marshall v. Marshall*.¹ The Plaintiff contends that, under *Marshall*, her claims for breach of fiduciary duty against the co-trustees of an inter vivos trust do not implicate the probate exception. We agree.

¹ 547 U.S. 293 (2006).

No. 12-20164

I.

In 1996, Elmer H. and Nelva E. Brunsting, Texas residents, established the Brunsting Family Living Trust (“the Trust”) for the benefit of their offspring. At the time of its creation, the Trust was funded with various assets. Both the will of Mr. Brunsting and the will of Mrs. Brunsting (collectively “the Brunstings’ Wills”) appear to include pour-over provisions, providing that all property in each estate is devised and bequeathed to the Trust.² Elmer H. Brunsting passed away on April 1, 2009, and Nelva E. Brunsting passed away on November 11, 2011. The current dispute arises out of the administration of the Trust.

Candace Curtis, Anita Brunsting, and Amy Brunsting are siblings. In February 2012, Candace Curtis (“Curtis”) filed a complaint in federal district court against Anita Brunsting and Amy Brunsting (collectively “the Defendants”) based on diversity jurisdiction. In that complaint, she alleged that Anita and Amy, acting as co-trustees of the Trust, had breached their fiduciary duties to Curtis, a beneficiary of the Trust. Specifically, she alleged that Anita and Amy had misappropriated Trust property, failed to provide her documents related to administration of the Trust, and failed to provide an accurate and timely accounting. The complaint alleged claims for breach of fiduciary duty, extrinsic fraud, constructive fraud, and intentional infliction of emotional distress. Curtis sought compensatory damages, punitive damages, a temporary restraining order against “wasting the estate,” and an injunction compelling both an accounting of Trust property and assets as well as production of documents and accounting records.

On March 1, 2012, the district court denied Curtis’s application for a temporary restraining order and injunction because the Defendants had not

² The signed copies of the Brunstings’ Wills are not included in the record, but Curtis provided unsigned copies, which we assume match the signed versions that have been admitted to probate.

No. 12-20164

been served with process. In the order, the district court judge noted that it “appears that the court lacks subject matter jurisdiction over the claim(s) asserted.” On March 6, 2012, in response to the *lis pendens* Curtis had filed related to property in Texas and Iowa, Anita and Amy filed an emergency motion to remove the *lis pendens*. The motion noted that it was subject to the Defendants’ contention that the federal district court lacked subject matter jurisdiction under the probate exception to federal court jurisdiction, an issue that the Defendants said would be raised in a separate Rule 12(b) motion to dismiss. On March 8, 2012, following a telephone conference with the parties, the district court judge entered a *sua sponte* order dismissing the case for lack of subject matter jurisdiction. In doing so, he concluded that the case falls within the probate exception to federal diversity jurisdiction. This appeal followed.

II.

This Court reviews *de novo* a district court’s dismissal for lack of subject-matter jurisdiction.³

III.

Although a federal court “has no jurisdiction to probate a will or administer an estate,”⁴ in *Markham v. Allen*, the Supreme Court recognized that the probate exception does not bar a federal court from exercising jurisdiction over all claims related to such a proceeding:

[F]ederal courts of equity have jurisdiction to entertain suits ‘in favor of creditors, legatees and heris’ and other claimants against a decedent’s estate ‘to establish their claims’ so long as the federal court does not interfere with the probate proceedings or assume

³ *Borden v. Allstate Ins. Co.*, 589 F.3d 168, 170 (5th Cir. 2009).

⁴ *Markham v. Allen*, 326 U.S. 490, 494 (1946).

No. 12-20164

general jurisdiction over the probate or control of the property in the custody of the state court.

Similarly while a federal court may not exercise its jurisdiction to disturb or affect the possession of property in the custody of a state court, it may exercise its jurisdiction to adjudicate rights in such property where the final judgment does not undertake to interfere with the state court's possession save to the extent that the state court is bound by the judgment to recognize the right adjudicated by the federal court.⁵

Sixty years later, in *Marshall v. Marshall*, the Supreme Court expressed concern with lower courts' interpretation of *Markham*, noting that "[l]ower federal courts have puzzled over the meaning of the words 'to interfere with the probate proceedings,' and some have read those words to block federal jurisdiction over a range of matters well beyond probate of a will or administration of a decedent's estate."⁶ Thus, the Supreme Court clarified the "distinctly limited scope" of the probate exception,⁷ explaining:

[W]e comprehend the 'interference' language in *Markham* as essentially a reiteration of the guiding principle that, when one court is exercising *in rem* jurisdiction over a *res*, a second court will not assume *in rem* jurisdiction over the same *res*. Thus, the probate exception reserves to state probate courts the probate or annulment of a will and the administration of a decedent's estate; it also precludes federal courts from endeavoring to dispose of property that is in the custody of a state probate court. But it does not bar federal courts from adjudicating matters outside those confines and otherwise within federal jurisdiction.⁸

The *Marshall* Court concluded that the federal district court had subject-matter jurisdiction, and the probate exception did not apply, reasoning: "[The claimant]

⁵ *Id.* (internal citations omitted).

⁶ 547 U.S. at 311.

⁷ *Id.* at 310.

⁸ *Id.* at 311–12.

No. 12-20164

seeks an *in personam* judgment against [the Defendant], not the probate or annulment of a will. Nor does she seek to reach a *res* in custody of a state court.”⁹ After *Marshall*, the probate exception only bars a federal district court from (1) probating or annulling a will or (2) “seek[ing] to reach a *res* in custody of a state court” by “endeavoring to dispose of [such] property.”¹⁰

As we see it, to determine whether the probate exception deprives a federal court of jurisdiction, *Marshall* requires a two-step inquiry into (1) whether the property in dispute is estate property within the custody of the probate court and (2) whether the plaintiff’s claims would require the federal court to assume *in rem* jurisdiction over that property. If the answer to both inquiries is yes, then the probate exception precludes the federal district court from exercising diversity jurisdiction. Here, we find the case outside the scope of the probate exception under the first step of the inquiry because the Trust is not property within the custody of the probate court.

As a threshold matter, the probate exception only applies if the dispute concerns property within the custody of a state court. The federal court cannot exercise *in rem* jurisdiction over a *res* in the custody of another court. Both of the Brunstings’ Wills were admitted to probate after the district court dismissed the case, and probate proceedings are ongoing.¹¹ However, nothing suggests that the Texas probate court currently has custody or *in rem* jurisdiction over the Trust. It likely does not. Assets placed in an inter vivos trust generally avoid probate, since such assets are owned by the trust, not the decedent, and

⁹ *Id.* at 312 (internal citations omitted).

¹⁰ *Id.* at 312–13.

¹¹ At the time the district court dismissed the case, no probate proceedings had been initiated. As such, there was no possibility that the case fell within the probate exception. Nevertheless, we must consider whether, upon remand, the federal district court would have subject-matter jurisdiction now that probate proceedings are ongoing.

No. 12-20164

therefore are not part of the decedent's estate.¹² In other words, because the assets in a living or inter vivos trust are not property of the estate at the time of the decedent's death, having been transferred to the trust years before, the trust is not in the custody of the probate court and as such the probate exception is inapplicable to disputes concerning administration of the trust. The record also indicates that there would be no probate of this Trust's assets upon the death of the surviving spouse.¹³ Finding no evidence that this Trust is subject to the ongoing probate proceedings, we conclude that the case falls outside the scope of the probate exception. The district court below erred in dismissing the case for lack of subject-matter jurisdiction.

IV.

For the reasons set forth above, we REVERSE the district court's dismissal of the case and REMAND for further proceedings. REVERSED AND REMANDED.

¹² See 3 TEX. PRAC. GUIDE WILLS, TRUSTS, AND EST. PLAN. § 10:83 ("Any property held in a revocable living trust is not considered a probate asset . . ."); 2 EST. TAX & PERS. FIN. PLAN. § 19:15 ("Avoidance of probate perhaps is the most publicized advantage of the revocable living trust."); 18 EST. PLAN. 98 ("Assets in a living trust are not subject to probate administration . . .").

¹³ Any assets "poured over" from the decedents' estates into the Trust would have to go through probate, but that does not change the fact that the Trust property over which the Defendants have been acting as Trustees would not be subject to probate, having been transferred to the Trust prior to the parents' deaths.

EXHIBIT B

Subject: RESPONSE FROM AN ATTORNEY
From: Carole Brunsting (cbrunsting@sbcglobal.net)
To: occurtis@sbcglobal.net;
Date: Thursday, December 29, 2016 6:56 AM

Dear Ms. Brunsting:

As you know, our firm represents your sister, Anita Brunsting, in her capacity as co-trustee of the trust. We are sending this response to you on the assumption that you continue to represent yourself, as we are not aware of any attorney taking over your representation since you separated from the Crain Caton law firm.

We received your request for a distribution and the request is denied. The reasons for denial include, but are not limited to, your articulated reasons are insufficient, Ms. Curtis's allegations in the probate litigation, and the estate's need to maintain liquidity for incurred debt.

We understand that you believe the probate court ordered that distributions be made for the reasons that you claimed. We are unaware of such an order. If you believe the probate court issued such a ruling, then please provide a copy of same.

Best wishes.

Very truly yours,
Stephen A. Mendel

The Mendel Law Firm, L.P.
1155 Dairy Ashford, Suite 104
Houston, TX 77079
O: 281-759-3213
F: 281-759-3214
steve@mendellawfirm.com

EXHIBIT C

THE BRUNSTING FAMILY LIMITED TRUST

**Co-Trustees' Counter-Offer Proposal of March 29, 2021
(the "Counter-Offer Proposal")**

A. Introductory Concepts and provisions governing Counter-Offer Proposal.

- Counter-Offer Proposal is based off of the December 31, 2020 Gross Value (Liquid Assets & Farm) of \$3,354,252.90, less a \$30,000.00 holdback for estimated fees and expenses associated with sale of the Farm.
 - Selling Siblings will share equally in any such fees and expenses in excess of \$30,000.00.
 - Selling Siblings will share equally in any unused portion of the \$30,000.00 holdback.
- Fees and expenses incurred to partition the Farm for any Non-Selling Siblings shall be shared equally by any Non-Selling Siblings.
- Conditioned on Acceptance (as term is defined below), each Party's reimbursement/contribution towards the attorneys' fees and expenses shall not exceed the fees and expenses presented in the Co-Trustee's proposal of 3/5/21, despite additional fees being incurred. The fee cap does not include fees and expenses incurred on or after April 1, 2021. Nor does the fee cap apply if there is no Acceptance.
 - Redacted invoices supporting fees to be provided upon Acceptance.

B. As proposed, each sibling would receive the following amounts (in cash and/or value):

Amy	\$651,063.23 - \$ 79,000.00	=	\$572,063.23 (cash)
Anita	\$651,063.23 - \$150,000.00	=	\$501,063.23 (cash)
Candy	\$651,063.23 - \$150,000.00	=	\$501,063.23 (cash)
Carl	\$750,000.00 - \$ 79,000.00	=	\$671,000.00 (cash)
Carole	\$651,063.23 - \$ 79,000.00	=	\$572,063.23 (cash & 1/5 TH of Farm)

- Carole's breakdown is approximately \$226,063.23 cash/\$425,000.00 farm.
- Conditioned on Acceptance, Gross Value to be updated through March 31, 2021 and above calculations adjusted accordingly.

- Settlement values will be adjusted pro rata from time to time until the settlement is approved by the court. The adjustment will be related to changes in market values for the Liquid Assets and/or the Farm.
- The settlement value will be further adjusted for taxes owed by the Trust or the Estates of Elmer Brunsting and/or Nelva Brunsting. Taxes, if any, for any distribution to any Sibling shall be paid by the receiving Sibling.

C. Vacek & Freed Litigation:

- The siblings shall issue a joint demand to Vacek & Freed for any remaining balance of the depleting insurance policy (whatever that amount may be – which is presently unknown).
- Monies received from Vacek & Freed in settlement are allocated equally among the siblings (increasing the totals in B, above).
- Any settlement with Vacek & Freed will be conditioned on mutual releases and indemnification, and will specifically include a withdrawal/dismissal of any sanctions-related motions asserted against Carl/Drina and/or their attorneys.

D. Key Provisions upon Acceptance and/or to be included in Comprehensive Settlement Agreement

- Settlement conditioned on all parties' acknowledgement of Probate Court No. 4's jurisdiction; all settlement documents and protocols to be construed under the laws of the State of Texas, as interpreted and applied through Probate Court No. 4; any disputes regarding the settlement agreement reached and/or the settlement documents executed will be determined under the laws of the State of Texas, in Probate Court No. 4.
- All claims by and/or against any party will be dismissed with prejudice, whether pending in Federal Court, Harris County District Court, and/or Probate Court No. 4, and the final settlement agreement will include mutual dismissals, indemnification, and releases of all parties and their attorneys.
- Upon Acceptance, the 5TH Circuit appellate proceeding will be withdrawn/dismissed by Candy within 24 hours of Acceptance.
- Conditioned on Acceptance, Amy will waive/release her right to any monies owed to her by Candy, as a previously-awarded sanction.
- As used herein, "**Acceptance**" means: each sibling (or sibling's legal counsel or other representative) providing a signed copy of this Counter-Offer Proposal to counsel for the

Co-Trustees, to be filed in Probate Court No. 4 of Harris County, Texas in accordance with Rule 11 of the Texas Rules of Civil Procedure.

E. Payment Terms:

- Upon Acceptance and receipt of executed copies of this Counter-Offer Proposal by counsel for the Co-Trustees, each sibling will receive \$50,000.00 in cash as an “advance” against their share. This payment will be made within ten (10) business days of Probate Court No 4’s approval of an Agreed Motion to Distribute, to be drafted by counsel for Co-Trustees, but “agreed and approved” by each sibling (or sibling’s legal counsel or other representative).
- The balance of cash payments owed to each sibling will be paid within 30 days of closing of the later of the sale of the Farm or the partition or all or any portions of the Farm.

[SIGNATURES ON FOLLOWING PAGE]

APPROVED AND AGREED VIA DOCUSIGN ELECTRONIC SIGNATURES:

AMY BRUNSTING (in all capacities) By: _____ Date: _____	CANDACE CURTIS By: _____ Date: _____
ANITA BRUNSTING (in all capacities) By: _____ Date: _____	CARL BRUNSTING By: _____ Date: _____
CAROLE BRUNSTING By: _____ Date: _____	

EXHIBIT D

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	1.50 395.00/hr	Canda L120	\$592.50
		conferred with			
		conferred with			
	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>	
11/14/2014	BEF	Reviewed motion for distribution, trust documents, federal injunction proceeding issues, special master transcript, C. Brunsting deposition, prior production and statements issued in the case; conferred with _____ conferred with J. Ostrom re hearing on motion to distribute, settlement history, and status of the case.	5.60 295.00/hr	Canda L120	\$1,652.00
11/15/2014	SAM	Reviewed correspondence from and prepared correspondence to _____ reviewed the court's electronic docket sheet.	0.30 395.00/hr	Canda L120	NO CHARGE
11/17/2014	BEF	Conferred with _____	1.60 295.00/hr	Canda L110	\$472.00
	BEF	Conferred with C. Reed (Vacek & Freed attorneys) re status and history of the case; reviewed file re same.	1.30 295.00/hr	Canda L110	\$383.50
	BEF	Prepared correspondence to _____ prepared response to _____	0.30 295.00/hr	Canda L110	NO CHARGE
11/18/2014	SAM	Reviewed the court's file re pending activity.	0.30 395.00/hr	Canda L120	\$118.50
11/19/2014	SAM	Prepared outline of pending issues; conferred with _____	1.40 395.00/hr	Canda L120	\$553.00
	TTT	Reviewed the trusts; conferred with _____	0.50 295.00/hr	Litiga L120	NO CHARGE
	BRD	Processed original documents.	0.50 129.50/hr	Litiga L140	NO CHARGE

			<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 Prepared correspondence to conferred with	0.30 295.00/hr	Trust L120	NO CHARGE
	BEF Reviewed federal case re history and developments that led to injunction and prepared motion to pay CPA; reviewed amendment to injunction allowing for same; conferred with prepared response to motion to distribute funds; prepared supplemental production.	2.10 295.00/hr	Canda L250	\$619.50
12/3/2014	SAM Conferred twice with	0.60 395.00/hr	Canda L120	\$237.00
	TTT Conferred with	0.30 295.00/hr	Trust L120	NO CHARGE
	BEF Prepared response to request for attorneys fees; reviewed trust documents and QBD re same; reviewed authorities re HEMS standard and no contest clause; conferred with reviewed file re disputed distributions and trust language and tests re same.	5.80 295.00/hr	Canda L240	\$1,711.00
12/5/2014	SAM Reviewed and revised the response to plaintiff's motion to remove the trustees and the motion for distribution of fund; conferred with ; prepared correspondence to	0.80 395.00/hr	Canda L240	\$316.00
	BEF Reviewed authorities re 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	3.10 295.00/hr	Carl L250	\$914.50

		<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	Conferred with	0.30 295.00/hr	Canda L330	NO CHARGE
	BEF	Prepared response to B. Bayless re injunction and deposition dates.	0.50 295.00/hr	Carl L330	\$147.50
	BEF	Reviewed C. Curtis' response to request for disclosure and compared to pleadings.	0.40 295.00/hr	Canda L330	\$118.00
1/13/2015	SAM	Conferred with	0.40 395.00/hr	Canda L120	\$158.00
	BEF	Conferred with	0.30 295.00/hr	Trust L110	NO CHARGE
	BEF	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	3.20 295.00/hr	Canda L310	\$944.00
	BEF	Reviewed authorities re	2.10 295.00/hr	Canda L120	\$619.50
1/14/2015	BEF	Conferred with	0.30 295.00/hr	Litiga L120	NO CHARGE
	BEF	Reviewed client documents re transactions and claims in Candace's pleadings.	0.30 295.00/hr	Canda L120	\$88.50
1/21/2015	BEF	Prepared correspondence to	0.10 295.00/hr	Canda 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>
	; conferred with		
2/18/2015	BEF Prepared response to C. Curtis' motion for \$40,000 distribution for attorneys' fees; prepared for, traveled to, attended, and returned from court oral hearing on motion for continuance and C. Curtis' motion for distribution; motion for continuance granted; C. Curtis' motion for distribution denied.	4.80 295.00/hr	Canda L230 \$1,416.00
	BEF Conferred with	0.50 295.00/hr	Carl L230 \$147.50
2/19/2015	KRC Reviewed request for disclosures; updated pleadings index.	0.20 129.50/hr	Litiga L140 NO CHARGE
	BEF Prepared correspondence to J. Ostrom re order of consolidation.	0.20 295.00/hr	Canda L250 \$59.00
	BEF Prepared correspondence to	0.20 295.00/hr	Canda L440 NO CHARGE
	BEF Reviewed file re B. Bayless inquiries into document production and tax returns; conferred with	0.60 295.00/hr	Trust L320 \$177.00
	BEF Reviewed Carl Brunsting's motion to resign; reviewed authorities re implications of same.	0.40 295.00/hr	Carl L250 \$118.00
2/20/2015	BEF Prepared correspondence to C. Reed re court's indication it would bring in legal malpractice case; reviewed C. Curtis' emails re objections to her appointment.	0.50 295.00/hr	Canda L120 \$147.50
2/23/2015	BEF Conferred with	1.10 295.00/hr	Canda L120 \$324.50

		<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>
3/16/2015	BEF	Prepared supplemental disclosures; reviewed file and document production re same conferred with	1.80 295.00/hr	Canda L310	\$531.00
3/17/2015	SAM	Conferred twice with B.	0.40 395.00/hr	Canda L120	\$158.00
	BEF	Conferred with J. Ostrom re available for hearing set by court and to disregard request to move hearing date on motion to compel, administrator issues, and potential assignment out of estate to will devisees.	0.30 295.00/hr	Canda L120	\$88.50
	BEF	Conferred with	0.80 295.00/hr	Canda L120	\$236.00
	BEF	Reviewed C. Curtis' supplemental response to request for disclosure and potential damage model; reviewed authorities re	3.10 295.00/hr	Canda L310	\$914.50
		prepared legal memorandum re same.			
	BEF	Prepared correspondence to	0.20 295.00/hr	Canda L120	NO CHARGE
3/18/2015	BEF	Reviewed and organized emails and recordings from prepared same for supplemental production.	1.70 295.00/hr	Canda L110	\$501.50
	BEF	Conferred with	0.30 295.00/hr	Canda L110	NO CHARGE
	BEF	Reviewed and organized emails and recordings from prepared same for supplemental production.	1.70 295.00/hr	Canda L110	\$501.50

		<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 trusts re reviewed file and	0.80 295.00/hr	Canda L120	\$236.00

		<u>Hrs/Rate</u>		<u>Amount</u>
5/15/2015	BEF	0.10 295.00/hr	Litiga L310	NO CHARGE
Prepared correspondence to				
5/18/2015	SAM	0.60 395.00/hr	Canda L120	\$237.00
Conferred twice with				
	TTT	0.30 295.00/hr	Canda L120	NO CHARGE
Conferred with				
	BEF	6.10 295.00/hr	Carl L310	\$1,799.50
Reviewed Carl Brunsting's supplemental response to request for disclosure; conferred with reviewed authorities re				
conferred with prepared outline of remaining issues in the case.				
5/19/2015	SAM	0.30 395.00/hr	Canda L120	NO CHARGE
Conferred with				
	BEF	0.40 295.00/hr	Carl L120	\$118.00
Conferred with				
	BEF	0.30 295.00/hr	Canda L120	\$88.50
Reviewed C. Curtis' motion to show authority, and C. Curtis' interrogatories.				
5/20/2015	BRD	1.00 129.50/hr	Canda L190	\$129.50
Conferred with				
	BEF	0.20 295.00/hr	Canda L310	NO CHARGE
Conferred with				

		<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 reviewed same; prepared correspondence to the parties re same; prepared correspondence to	0.80 395.00/hr	Trust L320	\$316.00
	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	1.80 195.00/hr	Trust L320	\$351.00
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.				
2/24/2017	SAM	2.80 395.00/hr	Trust L120	\$1,106.00
Reviewed and organized the financial records to produce; prepared master correspondence to the parties re same.				
	TJJ	1.10 195.00/hr	Litiga L320	NO CHARGE
Prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting.				
2/27/2017	SAM	0.20 395.00/hr	Trust L310	\$79.00
Reviewed correspondence from and prepared correspondence to C. Brunsting re accounting documents.				
3/1/2017	SAM	0.20 395.00/hr	Trust L310	\$79.00
Reviewed correspondence from C. Brunsting re accounting records.				
3/2/2017	SAM	2.00 395.00/hr	Trust L150	\$790.00
Reviewed and organized the accounting records; prepared correspondence to the Brunsting parties re same; conferred several times with				
	TJJ	1.00 195.00/hr	Trust L320	\$195.00
Prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting re accounting update for September 2016 to November 2016; conferred with				
3/3/2017	SAM	0.30 395.00/hr	Trust L120	\$118.50
Revised correspondence to the parties re the December 2016 and January 2017 accounting records.				
	TJJ	0.80 195.00/hr	Trust L320	\$156.00
Prepared correspondence to C. Curtis, Carl Brunsting, Carole Brunsting, and Amy Brunsting re accounting update for December 2016 and January 2017.				

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

			<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>
8/21/2018	TJJ	4.50 195.00/hr	Carl L240	\$877.50
	TJJ			
	SAM	1.80 395.00/hr	Canda L120	\$711.00
	TJJ	0.40 195.00/hr	Canda L120	NO CHARGE
8/22/2018	TJJ	4.90 195.00/hr	Carl L240	\$955.50
	SAM	0.60 395.00/hr	Carl L240	\$237.00
8/23/2018	TJJ	2.20 195.00/hr	Carl L240	\$429.00

		<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
	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.			
3/7/2019	SAM	0.20 395.00/hr	Trust L120	\$79.00
	TJJ	2.20 195.00/hr	Canda L230	\$429.00
	Prepared for, traveled to, attended, and returned from court re oral hearing on Anita Brunsting's motion to approve appraisal.			
	TJJ	0.20 195.00/hr	Canda L320	\$39.00
	Reviewed correspondence from C. Reed re C. Kunz-Freed withheld documents responsive to subpoena duces tecum.			
	TJJ	0.20 195.00/hr	Litiga L250	NO CHARGE
	Conferred with			
3/8/2019	TJJ	0.20 195.00/hr	Trust L390	\$39.00
	Reviewed correspondence from B. Bayless re legal fees in 2017 trust tax returns; reviewed returns re same.			
3/11/2019	SAM	0.30 395.00/hr	Canda L120	\$118.50
	TJJ	0.60 195.00/hr	Trust L390	\$117.00
	Reviewed 2017 trust tax returns re professional fees; conferred with prepared correspondence to B. Bayless re same.			
	TJJ	1.80 195.00/hr	Canda L320	\$351.00
	Reviewed privileged documents from C. Kunz-Freed re waiving privilege; reviewed and responded to correspondence from			

		<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	2.30 195.00/hr	Canda L250	\$448.50
	MT	0.60 129.50/hr	Canda L140	\$77.70
5/20/2019	TJJ	0.30 195.00/hr	Litiga L310	\$58.50
	TJJ	0.30 195.00/hr	Canda L310	\$58.50
5/21/2019	MT	0.20 129.50/hr	Litiga L140	NO CHARGE
	TJJ	0.30 195.00/hr	Canda L310	\$58.50
	TJJ	0.30 195.00/hr	Litiga L310	\$58.50
5/22/2019	TJJ	1.00 195.00/hr	Canda L210	\$195.00
6/6/2019	TJJ	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	Prepared memo to reviewed C. Kunz-Freed deposition transcript re same; reviewed authorities re	7.50 195.00/hr	Canda L330	\$1,462.50
6/26/2019	TJJ	Reviewed exhibits to C. Kunz-Freed deposition; conferred with reviewed C. Kunz-Freed deposition transcript re objections; prepared correspondence to conferred with	4.80 195.00/hr	Canda L330	\$936.00
	SAM	Prepared for the continued deposition of Candace Kunz-Freed; conferred several times with	1.00 395.00/hr	Canda L330	\$395.00
	TJJ	Conferred with	0.40 195.00/hr	Canda L330	NO CHARGE
6/27/2019	SAM	Prepared for, traveled to, attended, and returned from the deposition of Candace Kunz-Freed.	9.00 395.00/hr	Canda L330	\$3,555.00
	SAM	Conferred with conferred with S. Griffin re same strategy issues.	0.40 395.00/hr	Trust L120	\$158.00
	EJW	Reviewed authorities re conferred with	0.30 250.00/hr	Canda L120	NO CHARGE
	TJJ	Prepared for, traveled to, attended, and returned from C. Kunz-Freed deposition; prepared correspondence to	7.70 195.00/hr	Canda L330	\$1,501.50
6/28/2019	SAM	Reviewed the file for case status information for attended the conference call with	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	Reviewed and revised the second amended answer; conferred with prepared correspondence to	1.00 395.00/hr	Canda L210	\$395.00
	SAM	Reviewed and revised the response to Vacek & Freed's motion to appoint a personal representative; prepared correspondence to	1.00 395.00/hr	Canda L250	\$395.00
11/5/2019	MT	Updated litigation index re second amended answer and Amy's motion for second contempt and additional sanctions with proposed order; reviewed multiple correspondences to and from Judge Seymore re mediation and settlement alternatives.	0.40 129.50/hr	Canda L140	\$51.80
	SAM	Reviewed and revised the settlement proposal; prepared correspondence to reviewed authorities re prepared correspondence to prepared correspondence to	1.80 395.00/hr	Canda L160	\$711.00
11/6/2019	SAM	Prepared for, traveled to, attended, and returned from the oral hearing on Vacek & Freed's motion for the appointment of a single personal representative.	2.00 395.00/hr	Canda L230	\$790.00
11/7/2019	SAM	Reviewed correspondence from and prepared correspondence to reviewed multiple correspondence from N. Spielman and C. Seymore re settlement issues.	0.80 395.00/hr	Canda L160	\$316.00
	MT	Updated litigation index re amended notice of hearing re appointment of personal representative; reviewed and prepared docket matters re same.	0.20 129.50/hr	Canda L140	NO CHARGE
	EJW	Reviewed and redacted invoices.	0.30 250.00/hr	Trust L190	\$75.00
	EJW	Prepared documents for production.	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 Reviewed multiple correspondence from the parties re mediation issues; prepared correspondence to the parties re same; reviewed correspondence from and prepared correspondence to C. Schwager travel expense issues.	0.60 395.00/hr	Canda L160	\$237.00
1/16/2020	MT Updated litigation index re C. Curtis' objection to first supplemental petition.	0.10 129.50/hr	Canda L140	NO CHARGE
	SAM Reviewed correspondence from and prepared correspondence to	0.20 395.00/hr	Canda L160	\$79.00
1/18/2020	SAM Reviewed correspondence from C. Schwager re mediation; prepared correspondence to and reviewed correspondence from B. Bayless re same; prepared correspondence to	0.80 395.00/hr	Canda L160	\$316.00
1/23/2020	SAM Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Trust L120	\$118.50
1/25/2020	SAM Reviewed multiple correspondence from and prepared correspondence to reviewed the financial records to prepare the semi-annual 2019 accounting.	1.30 395.00/hr	Trust L120	\$513.50
1/27/2020	SAM Reviewed multiple correspondence from and prepared multiple correspondence to B. Bayless and N. Spielman re mediation issues; conferred with prepared correspondence to C. Schwager re mediation and forensic examination issues.	1.30 395.00/hr	Canda L160	\$513.50
1/28/2020	MT Conferred with L. Diaz re document production.	0.20 129.50/hr	Litiga L320	NO CHARGE
	SAM Reviewed multiple correspondence from prepared an outline of the semi-annual accounting report; conferred	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	0.50 395.00/hr	Trust L150	\$197.50
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.				
2/3/2020	SAM	0.40 395.00/hr	Canda L250	\$158.00
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				
	SAM	0.40 395.00/hr	Trust L120	\$158.00
Reviewed correspondence from and prepared correspondence to B. Bayless re the appraisal; reviewed the appraisal.				
2/5/2020	SAM	1.60 395.00/hr	Canda L160	\$632.00
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.				
2/8/2020	SAM	1.00 395.00/hr	Canda L250	\$395.00
Prepared draft order re the January 10, 2020 hearing; prepared correspondence to B. Bayless and N. Spielman re same.				
2/12/2020	SAM	0.70 395.00/hr	Canda L160	\$276.50
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				
2/13/2020	SAM	0.40 395.00/hr	Canda L120	\$158.00
Reviewed correspondence from reviewed correspondence from B. Bayless re same; prepared correspondence to and reviewed correspondence from				
2/15/2020	SAM	0.50 395.00/hr	Canda L160	\$197.50
Prepared the agreed mediation order; prepared correspondence to the parties re same.				

		<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	Reviewed correspondence from the court re the modified mediation order; revised same; prepared correspondence to	0.70 395.00/hr	Canda L160	\$276.50
	SAM	Reviewed correspondence from the court re the modified mediation order; revised same; prepared correspondence to B. Bayless re same.	0.60 395.00/hr	Canda L160	\$237.00
2/27/2020	SAM	Reviewed correspondence from N. Spielman and B. Bayless re the modified mediation order; revised same; conferred with Carole Brunsting re same; prepared correspondence to the court re same.	1.30 395.00/hr	Canda L160	\$513.50
2/28/2020	SAM	Reviewed correspondence from and prepared correspondence to B. Bayless and N. Spielman re the court's mediation order; reviewed correspondence from and prepared correspondence to	0.40 395.00/hr	Canda L160	\$158.00
3/13/2020	SAM	Conferred several times with Judge Davidson's office re mediation availability; reviewed correspondence from Judge Davidson's office re same; prepared correspondence to the parties re same.	1.00 395.00/hr	Canda L160	\$395.00
3/14/2020	SAM	Reviewed correspondence from the parties re mediation of the case; reviewed correspondence from and prepared correspondence to	0.40 395.00/hr	Canda L160	\$158.00
	SAM	Reviewed multiple correspondence from and prepared multiple correspondence to the parties re the bill of review; reviewed the court's file re same.	0.40 395.00/hr	Canda L210	\$158.00
3/15/2020	SAM	Reviewed multiple correspondence re the bill of review and mediation issues.	0.30 395.00/hr	Canda L160	\$118.50
3/21/2020	SAM	Reviewed the file re mediation issues.	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 foresenic 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	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	8.00 150.00/hr	Litiga L190	\$1,200.00
	SAM	Reviewed correspondence from and prepared correspondence to	0.30 395.00/hr	Canda L130	\$118.50
5/19/2020	MT	Prepared attorney fee affidavit.	0.40 129.50/hr	Litiga L210	\$51.80
	SAM	Reviewed and organized the attorneys' fee billing and expense records; prepared application for same; conferred with reviewed authorities re	0.60 395.00/hr	Litiga L190	\$237.00
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	8.30 150.00/hr	Litiga L190	\$1,245.00
5/20/2020	SAM	Conferred several times with	0.50 395.00/hr	Litiga L120	\$197.50
	ROC	Reviewed and organized attorneys' fees and expense billing records; prepared application for payment of same; conferred several times with	3.90 150.00/hr	Litiga L190	\$585.00
5/21/2020	SAM	Conferred several times with reviewed and organized the billing and expense records.	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; conferred several times with	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.

**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>
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	Reviewed and revised the co-trustees response to C. Curtis' federal Rule 60 motion for relief; reviewed and revised the proposed order re same; efiled and eserved same.	2.80 395.00/hr	Canda L240	\$1,106.00
8/14/2020	MT	Updated litigation index re co-trustee's response to ex parte motion for relief.	0.20 129.50/hr	Canda L210	NO CHARGE
	SAM	Reviewed correspondence from [REDACTED] re [REDACTED] reviewed the file re [REDACTED] prepared correspondence to [REDACTED] re [REDACTED]	0.40 395.00/hr	Trust L190	\$158.00
	SAM	Revised the proposed federal order to dismiss the rule 60 request for relief; prepared correspondence to [REDACTED] re [REDACTED]	0.80 395.00/hr	Canda L240	\$316.00
8/18/2020	SAM	Reviewed correspondence from [REDACTED] re [REDACTED] prepared multiple correspondence to [REDACTED] re [REDACTED]	0.50 395.00/hr	Canda L120	\$197.50
	SAM	Prepared multiple correspondence to and reviewed multiple correspondence from the court reporter re additional transcripts to obtain.	0.30 395.00/hr	Litiga L250	\$118.50
8/19/2020	SAM	Reviewed correspondence from and prepared correspondence to C. Schwager re deposition issues.	0.20 395.00/hr	Canda L330	\$79.00
	SAM	Reviewed authorities re [REDACTED] prepared correspondence to and reviewed correspondence from [REDACTED] re [REDACTED]	0.80 395.00/hr	Canda L240	\$316.00
8/20/2020	MT	Updated litigation index re notice of submission for motion to transfer and/or motion to vacate; reviewed and prepared docket matters re same.	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	0.20 129.50/hr	Canda L190	\$25.90
	RR	0.30 129.50/hr	Litiga L190	\$38.85
1/28/2022	RR	0.50 129.50/hr	Canda L190	\$64.75
1/31/2022	RR	0.20 129.50/hr	Trust L150	\$25.90
	SAM	0.30 395.00/hr	Litiga L250	\$118.50
2/1/2022	SAM	0.50 395.00/hr	Trust L150	\$197.50
	SAM	0.20 395.00/hr	Litiga L250	\$79.00
	KSM	6.00 129.50/hr	Trust L150	\$777.00
	SAM	1.00 395.00/hr	Trust L150	\$395.00
2/3/2022	SAM	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 E

How to steal your family inheritance

Updated on August 2, 2014

Today I received an email asking if I "Want to [legally](#) hijack some major cash today?" Sounds intriguing, but as luck would have it, I just this week discovered an ingenious method of hijacking cash (as well as other assets). Ok, so it's not 100% legal. And it takes a little more than a day. But it's most definitely a hijack.

The idea is brilliant in its simplicity: *Steal your own [inheritance](#)*.

I'd like to take credit for it, I really would. Alas, my brain is not wired for [financial](#) intrigue. I don't have a criminal mind.

The beauty of this idea is that even the most diabolically challenged (like me) can pull it off.

Step One: The Trust

You will need the following: Two elderly parents, a lawyer, an unsuspecting sibling, and some patience.

First, set up your FAMILY TRUST. There are two components to the trust: financial and medical. Obviously, your interest is in the financial. So as you are sitting with the family and the attorney, "graciously" allow your unsuspecting sibling (US) to be named as the person in charge of medical decisions for your parents. Since parents always want to be fair, they will naturally assign you to the lead financial role. Everyone will be happy. Especially you.

Now in this initial Trust document, there is a first position and a second position. Make sure you get the first financial position. Your US will be put in second position on the financial and you will be put in second position on the medical. This is all fair and square and makes the whole thing appear legit. Mom and Dad's future needs are now legally in the capable hands of their two devoted children. There are two decision makers for medical, two for financial. Lovely.

Read this Blog Before Your \$ Gets Stolen

- [Inheritance Heisters: Thieves with PhDs | A User's Guide to Guilt Free Thievery](#)

Step 2: The Setup

The Trust may sit gathering dust for some time. That's to be expected. The provisions of the Trust do not come into play until one of the parents becomes ill or dies. This may take some patience on your part. But trust me, it will be well worth the wait.

Now let's say the "triggering event" is that one parent becomes very sick. For the sake of argument, we will say it's the father. Suddenly the Trust document comes down off the shelf. Time to double check who is really authorized to make decisions for Dad's healthcare. Chances are very good that by this time, Mom is pretty distraught and probably not in the best mental shape to be authorizing "chemical code" or "DNR" decisions with Dad's doctors.

This is where having your unsuspecting sibling (US) as the primary healthcare decision-maker on the Trust comes into play. He will be so focused on doing the right thing medically, that he will not be paying any attention whatsoever to the financial side of things. After all, Mom and Dad still have healthcare benefits to pay for Dad's expenses. They still have income coming in. There's really nothing happening at this point that affects the financial aspect of the Family Trust.

At least, that's what US thinks...

Step 3: The Old Switcheroo

While Mom and US are dealing with Dad, you'll be busy in your own way. You'll have several clandestine meetings with your attorney. He or she will give you the high sign when it's time to make your move.

Since it's your own family we're talking about, you will know when the perfect moment arrives. It is imperative to wait until both US and Mom are totally distracted with caring for Dad. Hopefully by this time Dad will be really, really ill. It helps if he needs hospice care, as implementing hospice requires Power of Attorney.

Now assuming your US is like most, he is dead serious about his care-taking duties. He knows hospice is needed. When your lawyer suggests that he (US, not the lawyer) should obtain Power of Attorney, he (US, not the lawyer) readily agrees.

However, to make this happen, Mom, who is still listed in the Family Trust, and is not sick or dead yet, needs to be disenfranchised from any and all decision-making power.

How do you accomplish this, you ask? The answer is simple. You get Mom declared **mentally incompetent!**

Step 4: Movin' On Up

If you play this step right you will actually be able to get your US to cooperate as your unwitting accomplice. Have your lawyer tell US that it's a "mere formality" to get Mom declared mentally incompetent. Convince him this formality is necessary for him to get Dad enrolled in hospice.

Your objective here is to get US to be the one to **obtain the doctor's signature on a form declaring Mom mentally incompetent.** Trust me. He will not suspect a thing. He'll do anything/everything he can in the interest of supporting Dad and Mom through this incredibly difficult time.

As soon as you get that signed piece of paper, grab it and run -- don't walk -- to the lawyer's office. **You've now got what you need to rewrite the trust in your favor!** See how easy that was?

Sing it Queen -- I got a one track mind!

Step 5: Grab those Assets

With Dad now on his deathbed, both Mom and US are 100% distracted. They will have no idea what you're masterminding over at the old attorney's office. It will be months before they find out -- and by then it will be too late. Hehe.

So here's how this works:. Now that Dad is out of the picture (figurately for now, literally in a matter of weeks or days), that leaves only Mom to contend with. Oh wait! Remember, we got Mom declared mentally incompetent. So that means that the original trust document is no longer valid. Mom is officially legally incapable of making financial decisions for herself. Luckily, she has you, her faithful Trust executor, to make them for her!

Oh my! And what a conscientious little trust administrator you are! You are so on top of things and so diligent about managing the Family Trust that you don't waste a second. No sirree. The minute you get get that "mental incompetence" declaration signed, you get the lawyer to rewrite any/all sections of the Trust document that don't suit *your* needs, and off you go!

Money for Nothing

Step 6: Laugh all the Way to the Bank

De facto, you are now the only person with any legal claim to the Trust. With the mere stroke of a pen, you've obliterated both Mom and US from the document. Instead of the Family Trust, you could just as well title the revised document The Bank of Me.

Now, at some point after Dad kicks, US will probably regain his mental equilibrium. This is not to be confused with Mom -- her mental competency is gone, baby gone. It's signed, sealed and delivered on that scrap of paper her doctor signed. But US will eventually start poking his nose around the finances. You see, being a true caretaker at heart, he's still got a vested interest in making sure Mom's taken care of, now that she's a widow. And that means both physically/emotionally and financially.

No worries, however. US can't touch you or Mom's money. He's been summarily written out of the Trust document. That lawyer the whole family worked with to write the original document? Sorry, brother. That lawyer now represents you and only you. Not Mom and not US. YOU are the Trust. They are -- well, they are toast.