

FILED

2013 NOV 20 PM 12: 22

LINDA S. [Signature]  
WHITE PINE COUNTY CLERK  
BY

RECEIVED

NOV 20 2013

White Pine County Clerk

1 JULIE-CAVANAUGH-BILL  
NEVADA Bar No. 11533  
2 401 Railroad Street, Suite 307  
Elko, NV 89801  
(775) 753-4357  
(775) 753-4360-Facsimile

Attorney for Chery Noriega, James Adams, and Timothy McGowan, Ely Jet Center, Does 1 through 10, and Does Inc., 1 through 10,

IN THE SEVENTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR THE COUNTY OF WHITE PINE

\*\*\*

11 JOHN LAMPROS,

Plaintiff,

13 vs.

14 Chery Noriega, James Adams, and Timothy McGowan, Ely Jet Center, Does 1 through 10, and Does Inc., 1 through 10,

Defendants.

CASE No. CV-1308115

DECLARATION OF JULIE CAVANAUGH-BILL IN SUPPORT OF MOTION FOR ATTORNEYS' FEES AND COSTS

17 AND RELATED MATTERS

19 Julie Cavanaugh-Bill submits her Declaration in Support of the Motion for Attorneys' Fees and Costs as follows:

21 Attached hereto as Exhibit 1 is a true and correct copy of our billing sheet for the work on this case. The time spent was necessary and reasonable.

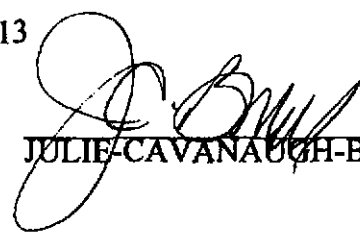
23 I believe our hourly rates of \$225.00 and \$250.00 are reasonable and customary for litigators of his caliber in our legal community.

25 I have practiced in Nevada since 2009, and my reputation has grown quickly and my firm is one of the larger and more sought-after firms by potential clients in Elko.

27 I declare under penalty of perjury the foregoing is true and correct of my own personal knowledge.

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DATED this 19<sup>th</sup> day of November, 2013




JULIE CAVANAUGH-BILL

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I do hereby certify that on November 20, 2013, I filed the preceding document, pursuant to which will be served on all parties to this action via regular mail, as follows:

Richard Sears  
1330 Aultman Street  
Ely, Nevada 89301

  
Signature \_\_\_\_\_

## Cavanaugh-Bill Law Offices, LLC

**Account summary for:**

James Tim Cheryl Adams McGowan  
Noriega (01)  
735 Ave H  
Ely, NV 89301

**Send payment to:**

401 Railroad Street  
Suite 307  
Elko, NV 89801

**Statement**

|                                   |                           |        |                        |            |
|-----------------------------------|---------------------------|--------|------------------------|------------|
| <b>Statement date:</b> 11/20/2013 | <b>Balance forward:</b>   | \$0.00 | <b>New charges:</b>    | \$8,699.00 |
|                                   | <b>Payments received:</b> | \$0.00 | <b>Amount now due:</b> | \$8,699.00 |

**Regarding:****Detail of Services Provided**

| Date       | Type  | Units | Rate     | Amount     | Notes  |
|------------|---|-------|----------|------------|--|
| 07/25/2013 | Expense - Misc.                                     | 1.00  | \$4.50   | \$4.50     | Copies to White Pine County  |
| 07/25/2013 | Expense - Misc.                                     | 1.00  | \$2.00   | \$2.00     | Credit card fee for copies to White Pine County  |
| 08/05/2013 | Expense - Misc.                                     | 1.00  | \$26.00  | \$26.00    | Copies from White Pine County  |
| 08/06/2013 | Expense - Misc.                                     | 1.00  | \$44.50  | \$44.50    | Copies from White Pine County  |
| 08/08/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.80  | \$225.00 | \$405.00   | Initial consult with client's; T/C with G. Taylor at AG's office; draft letter re same |
| 08/08/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.30  | \$225.00 | \$67.50    | T/C with J.Adams; review and respond to client communications                          |
| 08/08/2013 | Jeff Dickerson                                      | 1.00  | \$250.00 | \$250.00   | Initial conference with clients.   |
| 08/09/2013 | Jeff Dickerson                                      | 1.50  | \$250.00 | \$375.00   | Review documents   |
| 08/09/2013 | New client file<br>setup                            | 1.00  | \$125.00 | \$125.00   |  |
| 08/11/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20  | \$225.00 | \$45.00    | Review and respond to client communications re Lampros suit                            |
| 08/12/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.60  | \$225.00 | \$135.00   | Review, analysis and responses re Lampros and Antislapp                                |
| 08/12/2013 | Jeff Dickerson                                      | 0.50  | \$250.00 | \$125.00   | T/C with JCB re anti-SLAPP   |
| 08/15/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.80  | \$225.00 | \$180.00   | Confers re search on service and filing issues; review and respond to client re same   |
| 08/16/2013 | Expense - Misc.                                     | 1.00  | \$11.50  | \$11.50    | Copies from White Pine County  |
| 08/18/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.80  | \$225.00 | \$180.00   | Analysis and drafting of motion  |
| 08/18/2013 | Jeff Dickerson                                      | 5.00  | \$250.00 | \$1,250.00 | Legal research re Anti-SLAPP   |
| 08/19/2013 | Member Attorney<br>- Legal - Regular                | 1.00  | \$225.00 | \$225.00   | Continue draft motion and confer   |



## Detail of Services Provided

|            | Client Rate   |      |          |          |  |
|------------|---|------|----------|----------|--|
| 08/19/2013 | Expense - Misc.                                     | 1.00 | \$23.00  | \$23.00  | Copies from White Pine County  |
| 08/20/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.10 | \$225.00 | \$247.50 | Review and respond to client communications; review and analysis of supporting docs; continue draft motion |
| 08/21/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.00 | \$225.00 | \$225.00 | Confer re anti-slapp analysis; review and respond to J.Adams   |
| 08/21/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review email from CB Law to JAD  |
| 08/22/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 2.60 | \$225.00 | \$585.00 | Continue draft brief with factual background; confer re same; communications to clients re same            |
| 08/22/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review and respond to email from JCB   |
| 08/22/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review email string: TMcG and JCB  |
| 08/23/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review email string: JCB and CN  |
| 08/23/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.15 | \$225.00 | \$33.75  | Confer re strategy   |
| 08/28/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.60 | \$225.00 | \$135.00 | Finalize motion re Lemich confer re lamoros  |
| 08/29/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.05 | \$225.00 | \$11.25  | review 16.1 disclosures from Ely Jet Center  |
| 08/30/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.40 | \$225.00 | \$90.00  | Confer re Lampros motion   |
| 08/31/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.15 | \$225.00 | \$33.75  | Confer re amended complaint extension; communications to R.Sears and clients re same                       |
| 09/03/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Confer re status   |
| 09/05/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review attorney-client retainer agreement  |
| 09/06/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review and respond to communications from Sears  |
| 09/07/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.90 | \$225.00 | \$202.50 | Communications to R. Sears re dismissal; motion to dismiss on Lampros                                      |
| 09/08/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.80 | \$225.00 | \$180.00 | Affidavits and finalize motion   |
| 09/15/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.30 | \$225.00 | \$67.50  | Review and respond to client communications  |
| 09/16/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.20 | \$75.00  | \$15.00  | Letter to court  |
| 09/17/2013 | Jeff Dickerson                                      | 0.75 | \$250.00 | \$187.50 | Review opposition to motion to dismiss; T/C with JCB re same   |
| 09/18/2013 | Expense - Misc.                                     | 1.00 | \$10.00  | \$10.00  | Copies to White Pine County  |
| 09/18/2013 | Member Attorney                                     | 0.10 | \$225.00 | \$22.50  | T/C with client re opposition and hearing  |

## Detail of Services Provided

|            | - Legal - Regular Client Rate                 |      |          |          |   |
|------------|---|------|----------|----------|---|
| 09/19/2013 | Member Attorney - Legal - Regular Client Rate | 0.80 | \$225.00 | \$180.00 | Prep reply  |
| 09/22/2013 | Member Attorney - Legal - Regular Client Rate | 0.23 | \$225.00 | \$50.63  | Continue reply prep   |
| 09/23/2013 | Member Attorney - Legal - Regular Client Rate | 0.23 | \$225.00 | \$50.63  | Confer re reply   |
| 09/24/2013 | Legal Assistant-Regular-TS                    | 0.08 | \$75.00  | \$5.63   | T/C re left voicemail update on case  |
| 09/25/2013 | Member Attorney - Legal - Regular Client Rate | 0.15 | \$225.00 | \$33.75  | Confer re Lampros opposition  |
| 09/26/2013 | Member Attorney - Legal - Regular Client Rate | 1.73 | \$225.00 | \$388.13 | Prep reply; confers re same and communications with client re same                        |
| 09/26/2013 | legal Assistant-Regular Rate- CC              | 0.75 | \$75.00  | \$56.25  | Reply to opposition and affidavit   |
| 09/27/2013 | Member Attorney - Legal - Regular Client Rate | 0.30 | \$225.00 | \$67.50  | Complete replies and affidavits; request for review; T/C with McGowan and Adams           |
| 09/27/2013 | Legal Assistant-Regular-TS                    | 0.20 | \$75.00  | \$15.00  | Request for review on Lemich and Lampros  |
| 09/27/2013 | Legal Assistant-Regular-TS                    | 0.25 | \$75.00  | \$18.75  | Prep and send replies out for filing  |
| 09/28/2013 | Legal Assistant-Regular-TS                    | 0.20 | \$75.00  | \$15.00  | Review and respond to client emails   |
| 10/07/2013 | Member Attorney - Legal - Regular Client Rate | 0.15 | \$225.00 | \$33.75  | Review and respond to client communications; T/C with court clerk; confer re same         |
| 10/09/2013 | Member Attorney - Legal - Regular Client Rate | 0.10 | \$225.00 | \$22.50  | Confer re status  |
| 10/16/2013 | Member Attorney - Legal - Regular Client Rate | 0.05 | \$225.00 | \$11.25  | Review and respond to H.Copeland re Judge Thompson  |
| 10/20/2013 | Member Attorney - Legal - Regular Client Rate | 0.05 | \$225.00 | \$11.25  | review and respond to client communications   |
| 10/21/2013 | Legal Assistant-Regular-TS                    | 0.05 | \$75.00  | \$3.75   | T/C with sears office re court hearings   |
| 10/25/2013 | Member Attorney - Legal - Regular Client Rate | 0.50 | \$225.00 | \$112.50 | T/C with H.Copeland re status.  |
| 10/30/2013 | Member Attorney - Legal - Regular Client Rate | 0.60 | \$225.00 | \$135.00 | Review and analysis of order; T/C with T McGona re same; communications to client re same |
| 11/01/2013 | Member Attorney                               | 0.30 | \$225.00 | \$67.50  | T/C with J Dickerson  |

## Detail of Services Provided

|            |   |      |          |          |  |
|------------|---|------|----------|----------|--|
|            | - Legal - Regular<br>Client Rate                    |      |          |          |  |
| 11/03/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Conference call with clients re next steps   |
| 11/04/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.10 | \$225.00 | \$22.50  | Communications with J Ceshmore   |
| 11/04/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.50 | \$225.00 | \$112.50 | Review, respond and analysis of client communications  |
| 11/11/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.40 | \$225.00 | \$90.00  | Review, respond and analysis of client communications  |
| 11/11/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.30 | \$225.00 | \$67.50  | Initial prep motion for attorney fees  |
| 11/12/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review, respond and analysis of client communications  |
| 11/12/2013 | legal<br>Assistant-Regular<br>Rate- CC              | 0.60 | \$75.00  | \$45.00  | Motion for atty fees   |
| 11/13/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.00 | \$225.00 | \$225.00 | T/C with R Sears re potential settlement and client re<br>same; T/C with J Dickerson; continue draft motion for<br>attorney fees |
| 11/17/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.10 | \$225.00 | \$22.50  | Review client communications   |
| 11/18/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review and respond to client communications  |
| 11/19/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review client communications; respond to J Dickerson re<br>same  |
| 11/19/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.20 | \$225.00 | \$270.00 | Complete atty fee motion   |
| 11/19/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.30 | \$75.00  | \$22.50  | Edits on declaration; review client communications   |
| 11/19/2013 | legal<br>Assistant-Regular<br>Rate- CC              | 0.40 | \$75.00  | \$30.00  | Notice of entry of order   |
| 11/19/2013 | legal<br>Assistant-Regular<br>Rate- CC              | 0.70 | \$75.00  | \$52.50  | Aff for atty fees  |
| 11/20/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Respond to client communications; sent draft motion to<br>clients  |

Detail of Services Provided

\*Please pay amount due within 30 days of statement to avoid late fees. Thank you

Please detach this portion and return it with your payment

James Tim Cheryl Adams McGowan Noriega  
(01)  
735 Ave H  
Ely, NV 89301

**Cavanaugh-Bill Law Offices, LLC**

**Statement date:** 11/20/2013

**Amount now due:** \$8,699.00

**Amount enclosed:**

[Empty rectangular box for amount enclosed]

Cavanaugh-Bill Law Offices, LLC  
401 Railroad Street  
Suite 307  
Elko, NV 89801

**Has your address changed?**  
Check this box and note changes on  
reverse side. Thank you!



FILED

2013 NOV 20 PM 12: 21

LINDA G. DEBLES  
WHITE PINE COUNTY CLERK  
BY: 

1 CASE NO.: CV-1308115

**This Document contains the Social Security Number of a person as Required by NRS 123.130, NRS 125.230, and NRS 125B.055**

White Pine County Clerk

RECEIVED

NOV 20 2013

Cavanaugh-Bill Law Offices, LLC  
401 Railroad Street, Suite 307  
Elko, Nevada 89801  
(775) 753-4357; fax (775) 753-4360

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**IN THE SEVENTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF WHITE PINE**

John Lampros

Plaintiff,

vs.

**MOTION FOR ATTORNEY'S FEES PURSUANT TO NRS 41.670**

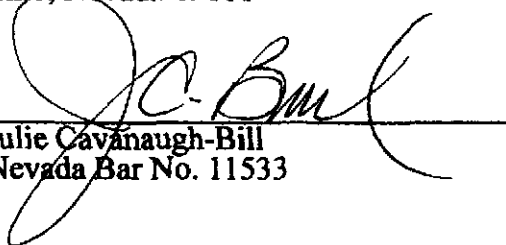
Cheryl Noriega, James Adams, and Timothy McGowan, Ely Jet Center, Does 1 through 10, and Does Inc., 1 through 10,

Defendants.

COMES NOW Defendants, CHERYL NORIEGA, JAMES ADAMS AND TIMOTHY MCGOWAN, by and through their attorneys, JULIE CAVANAUGH-BILL, and JEFFREY A. DICKERSON, and hereby move the Court for attorney's fees and costs pursuant to NRS 41.670. This motion is based on the Memorandum of Points and Authorities and Affidavit of Counsel attached hereto, as well as the pleadings and papers filed herein.

DATED this 20<sup>th</sup> day of November, 2013.

Cavanaugh-Bill Law Offices, LLC  
401 Railroad Street, Suite 307  
Elko, Nevada 89801

  
Julie Cavanaugh-Bill  
Nevada Bar No. 11533

**NOTICE OF MOTION**

**TO: PLAINTIFF JOHN LAMPROS**

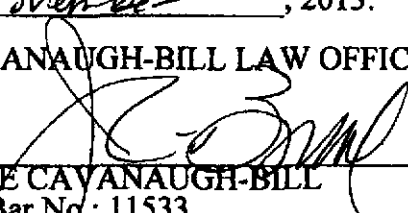
**YOU AND EACH OF YOU PLEASE TAKE NOTICE** that the Defendants have filed a Motion for Attorney's Fees pursuant to NRS 41.670.

If you oppose the Motion, you have ten (10) days plus three (3) days if this motion was received by mail (not counting weekends and holidays) from the day after this Motion was served on you, to serve on the CAVANAUGH-BILL LAW OFFICES, LLC, 401 Railroad Street, Suite 307, Elko, Nevada, 89801, and to file with the Court Clerk of the Seventh Judicial District Court, in and for the County of Elko, State of Nevada, a written Response. If you fail to respond within ten days, the Court may enter an Order as requested by the Plaintiff without a hearing and without further notice to you, and without further chance to respond.

A hearing on this matter is not requested.

DATED this 20<sup>th</sup> day of November, 2013.

CAVANAUGH-BILL LAW OFFICES, LLC

By:   
JULIE CAVANAUGH-BILL  
NV Bar No.: 11533  
401 Railroad Street, Ste. 307  
Elko Nevada 89801  
(Attorney for Defendants)

Cavanaugh-Bill Law Offices, LLC  
401 Railroad Street, Suite 307  
Elko, Nevada 89801  
(775) 753-4357; fax (775) 753-4360

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**MEMORANDUM OF POINTS AND AUTHORITIES**

**1. MOTION FOR ATTORNEY FEES AND COSTS**

**a. Introduction**

Defendants, CHERYL NORIEGA, JAMES ADAMS, AND TIMOTHY MCGOWAN (“Defendants”) request Plaintiff, JOHN LAMPROS, pay their attorney fees as mandated by NRS 41.670 along with the \$10,000 penalty for each Defendant, as they were the prevailing party in this case, and because Plaintiff’s lawsuit was brought with clear intent to stifle Defendant’s protected rights to file the Recall Petition in direct violation of Nevada’s ANTI-SLAPP provisions.

**b. Legal Argument**

NRS 41.670 provides the following:

- 1. If the court grants a special motion to dismiss filed pursuant to NRS 41.660:
  - (a) The court shall award reasonable costs and attorney’s fees to the person against whom the action was brought...
  - (b) The court may award, in addition to reasonable costs and attorney’s fees awarded pursuant to paragraph (a), an amount of up to \$10,000 to the person against whom the action was brought.

In *Miller v. Wilfong*, 119 P.3d 727 (1995) the Nevada Supreme Court held that it is within the trial court’s discretion to determine the “reasonable” amount of attorney fees under a statute or rule and in exercising that discretion, the court must evaluate the factors set forth in *Brunzell v. Golden Gate National Bank*, 85 Nev. 345, 455 P.2d 31 (1969).

In *Brunzell*, the Nevada Supreme Court held as follows:

From a study of the authorities it would appear such factors may be classified under four general headings (1) the qualities of the advocate: his ability, his training, education, experience, professional standing and skill; (2) the character of the work to be done: its difficulty, its intricacy, its importance, time and skill required, the responsibility imposed and the prominence and character of the parties where they affect the importance of the litigation; (3) the work actually performed by the lawyer: the skill, time and attention given to the work; (4) the result: whether the attorney was successful and what benefits were derived. Furthermore, good judgment would dictate that each of these factors be given consideration by the trier of fact and that no one element should predominate or be given undue weight. *Id.* 85 Nev. at 349; 455 P.2d at 33.

Cavanaugh-Bill Law Offices, LLC  
401 Railroad Street, Suite 307  
Elko, Nevada 89801  
(775) 753-4357; fax (775) 753-4360

1 Applying these factors to the instant case:

2 (1) The qualities of the attorneys: Julie Cavanaugh-Bill and Jeffrey A. Dickerson are  
3 well-qualified attorneys who have over thirty years of civil legal practice between them.  
4 Ms. Cavanaugh-Bill was licensed in 1998 and spent the first four years of practice in  
5 complex commercial litigation in Minnesota, since receiving her license in Nevada in 2009,  
6 Ms. Cavanaugh-Bill has been involved extensively in both State and Federal civil cases.  
7 Mr. Dickerson has devoted much of his thirty year legal career to civil rights and general  
8 civil litigation.

9 (2) The character of work to be done. The work to be done on this particular case  
10 was the representation and defense of the Defendants in a civil case brought by Plaintiff  
11 in violation of their right to petition.

12 (3) The work actually performed by the lawyers. Work performed included  
13 compilation of information and filing of a Special Motion to Dismiss pursuant to Nevada's  
14 Anti-SLAPP laws. Numerous discussions and conference calls took place as Counsel and  
15 clients put together necessary background information for the commissioners' meetings and  
16 other evidence for the good faith basis of their statements as alleged in Plaintiff's  
17 complaint.

18 (4) The result: Defendants were successful and their Special Motion to Dismiss was  
19 granted on October 30, 2013. A Notice of Entry of Order is being filed simultaneously  
20 herewith.

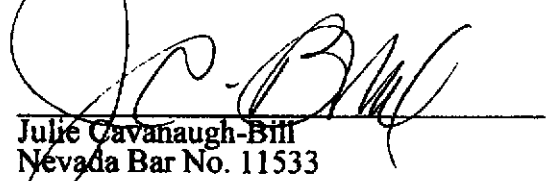
21 With respect to the \$10,000 additional awards, Plaintiff brought the lawsuit to stop  
22 a recall petition filed by the Defendants. Said recall petition did in fact fail, and that failure  
23 was due to the overwhelming chilling effect the lawsuit had on citizens of White Pine  
24 County as reflected by local news articles submitted with Defendants' Motion and Reply.  
25 To deter such actions being pursued by other county officials and to redress Defendants for  
26 the stress and political frustration involved with defending this lawsuit, a penalty above and  
27 beyond the attorney fees and costs is warranted.

28 WHEREFORE, Defendants, CHERYL NORIEGA, JAMES ADAMS, and  
TIMOTHY MCGOWAN respectfully requests that this Court:

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1. Award Defendants' attorney fees and costs and in the amount of \$8, 699.00;
  2. Award the additional amount of \$10,000 for each Defendant;
  3. Order other such relief as the Court deems fair and equitable.
- DATED this 20<sup>th</sup> day of November, 2013.

Cavanaugh-Bill Law Offices, LLC  
 401 Railroad Street, Suite 307  
 Elko, Nevada 89801



Julie Cavanaugh-Bill  
 Nevada Bar No. 11533

Jeffrey A. Dickerson  
 Nevada Bar No. 2690

*Attorneys for the Defendants*

Cavanaugh-Bill Law Offices, LLC  
 401 Railroad Street, Suite 307  
 Elko, Nevada 89801  
 (775) 753-4357; fax (775) 753-4360

Detail of Services Provided

\*Please pay amount due within 30 days of statement to avoid late fees. Thank you

*Please detach this portion and return it with your payment*

James Tim Cheryl Adams McGowan Noriega  
(01)  
735 Ave H  
Ely, NV 89301

**Cavanaugh-Bill Law Offices, LLC**

**Statement date:** 11/20/2013

**Amount now due:** \$8,699.00

**Amount enclosed:**

Cavanaugh-Bill Law Offices, LLC  
401 Railroad Street  
Suite 307  
Elko, NV 89801

**Has your address changed?**  
Check this box and note changes on  
reverse side. Thank you!

## Cavanaugh-Bill Law Offices, LLC

**Account summary for:**

James Tim Cheryl Adams McGowan  
Noriega (01)  
735 Ave H  
Ely, NV 89301

**Send payment to:**

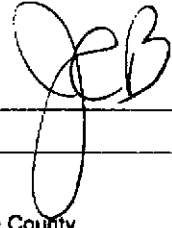
401 Railroad Street  
Suite 307  
Elko, NV 89801

**Statement**

|                            |                    |        |                 |            |
|----------------------------|--------------------|--------|-----------------|------------|
| Statement date: 11/20/2013 | Balance forward:   | \$0.00 | New charges:    | \$8,699.00 |
|                            | Payments received: | \$0.00 | Amount now due: | \$8,699.00 |

**Regarding:**

## Detail of Services Provided



| Date       | Type  | Units | Rate     | Amount     | Notes  |
|------------|---|-------|----------|------------|--|
| 07/25/2013 | Expense - Misc.                                     | 1.00  | \$4.50   | \$4.50     | Copies to White Pine County  |
| 07/25/2013 | Expense - Misc.                                     | 1.00  | \$2.00   | \$2.00     | Credit card fee for copies to White Pine County  |
| 08/05/2013 | Expense - Misc.                                     | 1.00  | \$26.00  | \$26.00    | Copies from White Pine County  |
| 08/06/2013 | Expense - Misc.                                     | 1.00  | \$44.50  | \$44.50    | Copies from White Pine County  |
| 08/08/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.80  | \$225.00 | \$405.00   | Initial consult with client's; T/C with G. Taylor at AG's office; draft letter re same |
| 08/08/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.30  | \$225.00 | \$67.50    | T/C with J.Adams; review and respond to client communications                          |
| 08/08/2013 | Jeff Dickerson                                      | 1.00  | \$250.00 | \$250.00   | Initial conference with clients.   |
| 08/09/2013 | Jeff Dickerson                                      | 1.50  | \$250.00 | \$375.00   | Review documents   |
| 08/09/2013 | New client file<br>setup                            | 1.00  | \$125.00 | \$125.00   |  |
| 08/11/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20  | \$225.00 | \$45.00    | Review and respond to client communications re Lampros suit                            |
| 08/12/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.60  | \$225.00 | \$135.00   | Review, analysis and responses re Lamros and Antislapp                                 |
| 08/12/2013 | Jeff Dickerson                                      | 0.50  | \$250.00 | \$125.00   | T/C with JCB re anti-SLAPP   |
| 08/15/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.80  | \$225.00 | \$180.00   | Confers re search on service and filing issues; review and respond to client re same   |
| 08/16/2013 | Expense - Misc.                                     | 1.00  | \$11.50  | \$11.50    | Copies from White Pine County  |
| 08/18/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.80  | \$225.00 | \$180.00   | Analysis and drafting of motion  |
| 08/18/2013 | Jeff Dickerson                                      | 5.00  | \$250.00 | \$1,250.00 | Legal research re Anti-SLAPP   |
| 08/19/2013 | Member Attorney<br>- Legal - Regular                | 1.00  | \$225.00 | \$225.00   | Continue draft motion and confer   |

## Detail of Services Provided

|            | Client Rate   |      |          |          |  |
|------------|---|------|----------|----------|--|
| 08/19/2013 | Expense - Misc.                                     | 1.00 | \$23.00  | \$23.00  | Copies from White Pine County  |
| 08/20/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.10 | \$225.00 | \$247.50 | Review and respond to client communications; review and analysis of supporting docs; continue draft motion |
| 08/21/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.00 | \$225.00 | \$225.00 | Confer re anti-slapp analysis; review and respond to J.Adams   |
| 08/21/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review email from CB Law to JAD  |
| 08/22/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 2.60 | \$225.00 | \$585.00 | Continue draft brief with factual background; confer re same; communications to clients re same            |
| 08/22/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review and respond to email from JCB   |
| 08/22/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review email string: TMcG and JCB  |
| 08/23/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review email string: JCB and CN  |
| 08/23/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.15 | \$225.00 | \$33.75  | Confer re strategy   |
| 08/28/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.60 | \$225.00 | \$135.00 | Finalize motion re Lemich confer re lamoros  |
| 08/29/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.05 | \$225.00 | \$11.25  | review 16.1 disclosures from Ely Jet Center  |
| 08/30/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.40 | \$225.00 | \$90.00  | Confer re Lampros motion   |
| 08/31/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.15 | \$225.00 | \$33.75  | Confer re amended complaint extension; communications to R.Sears and clients re same                       |
| 09/03/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Confer re status   |
| 09/05/2013 | Jeff Dickerson                                      | 0.50 | \$250.00 | \$125.00 | Review attorney-client retainer agreement  |
| 09/06/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review and respond to communications from Sears  |
| 09/07/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.90 | \$225.00 | \$202.50 | Communications to R. Sears re dismissal; motion to dismiss on Lampros                                      |
| 09/08/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.80 | \$225.00 | \$180.00 | Affidavits and finalize motion   |
| 09/15/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.30 | \$225.00 | \$67.50  | Review and respond to client communications  |
| 09/16/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.20 | \$75.00  | \$15.00  | Letter to court  |
| 09/17/2013 | Jeff Dickerson                                      | 0.75 | \$250.00 | \$187.50 | Review opposition to motion to dismiss; T/C with JCB re same   |
| 09/18/2013 | Expense - Misc.                                     | 1.00 | \$10.00  | \$10.00  | Copies to White Pine County  |
| 09/18/2013 | Member Attorney                                     | 0.10 | \$225.00 | \$22.50  | T/C with client re opposition and hearing  |



## Detail of Services Provided

|            | - Legal - Regular<br>Client Rate                    |      |          |          |  |
|------------|---|------|----------|----------|--|
| 09/19/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.80 | \$225.00 | \$180.00 | Prep reply   |
| 09/22/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.23 | \$225.00 | \$50.63  | Continue reply prep  |
| 09/23/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.23 | \$225.00 | \$50.63  | Confer re reply  |
| 09/24/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.08 | \$75.00  | \$5.63   | T/C re left voicemail update on case   |
| 09/25/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.15 | \$225.00 | \$33.75  | Confer re Lampros opposition   |
| 09/26/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.73 | \$225.00 | \$388.13 | Prep reply; confers re same and communications with<br>client re same                        |
| 09/26/2013 | legal<br>Assistant-Regular<br>Rate- CC              | 0.75 | \$75.00  | \$56.25  | Reply to opposition and affidavit  |
| 09/27/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.30 | \$225.00 | \$67.50  | Complete replies and affidavits; request for review; T/C<br>with McGowan and Adams           |
| 09/27/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.20 | \$75.00  | \$15.00  | Request for review on Lemich and Lampros   |
| 09/27/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.25 | \$75.00  | \$18.75  | Prep and send replies out for filing   |
| 09/28/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.20 | \$75.00  | \$15.00  | Review and respond to client emails  |
| 10/07/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.15 | \$225.00 | \$33.75  | Review and respond to client communications; T/C with<br>court clerk; confer re same         |
| 10/09/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.10 | \$225.00 | \$22.50  | Confer re status   |
| 10/16/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.05 | \$225.00 | \$11.25  | Review and respond to H.Copeland re Judge Thompson   |
| 10/20/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.05 | \$225.00 | \$11.25  | review and respond to client communications  |
| 10/21/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.05 | \$75.00  | \$3.75   | T/C with sears office re court hearings  |
| 10/25/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.50 | \$225.00 | \$112.50 | T/C with H.Copeland re status.   |
| 10/30/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.60 | \$225.00 | \$135.00 | Review and analysis of order; T/C with T McGona re<br>same; communications to client re same |
| 11/01/2013 | Member Attorney                                     | 0.30 | \$225.00 | \$67.50  | T/C with J Dickerson   |

## Detail of Services Provided

|            | - Legal - Regular<br>Client Rate                    |      |          |          |  |
|------------|---|------|----------|----------|--|
| 11/03/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Conference call with clients re next steps   |
| 11/04/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.10 | \$225.00 | \$22.50  | Communications with J Ceshmore   |
| 11/04/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.50 | \$225.00 | \$112.50 | Review, respond and analysis of client communications  |
| 11/11/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.40 | \$225.00 | \$90.00  | Review, respond and analysis of client communications  |
| 11/11/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.30 | \$225.00 | \$67.50  | Initial prep motion for attorney fees  |
| 11/12/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review, respond and analysis of client communications  |
| 11/12/2013 | legal<br>Assistant-Regular<br>Rate- CC              | 0.60 | \$75.00  | \$45.00  | Motion for atty fees   |
| 11/13/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.00 | \$225.00 | \$225.00 | T/C with R Sears re potential settlement and client re<br>same; T/C with J Dickerson; continue draft motion for<br>attorney fees |
| 11/17/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.10 | \$225.00 | \$22.50  | Review client communications   |
| 11/18/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review and respond to client communications  |
| 11/19/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Review client communications; respond to J Dickerson re<br>same  |
| 11/19/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 1.20 | \$225.00 | \$270.00 | Complete atty fee motion   |
| 11/19/2013 | Legal<br>Assistant-Regular-<br>TS                   | 0.30 | \$75.00  | \$22.50  | Edits on declaration; review client communications   |
| 11/19/2013 | legal<br>Assistant-Regular<br>Rate- CC              | 0.40 | \$75.00  | \$30.00  | Notice of entry of order   |
| 11/19/2013 | legal<br>Assistant-Regular<br>Rate- CC              | 0.70 | \$75.00  | \$52.50  | Aff for atty fees  |
| 11/20/2013 | Member Attorney<br>- Legal - Regular<br>Client Rate | 0.20 | \$225.00 | \$45.00  | Respond to client communications; sent draft motion to<br>clients  |