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Page: 1
 12/08/2016
 ACCOUNT NO: 1363-001M
 STATEMENT NO: 6

Carolyn Tanner

ACCOUNT NO:
 STATEMENT NO:

Switch, Ltd. vs.

PREVIOUS BALANCE \$50,762.05

FEES THROUGH 11/25/2016

			HOURS	
10/31/2016	KRR	Receive, review stipulation to stay (.3). Telephone conference with Carolyn regarding proposed stay (.4). Telephone conference with Nick Santoro regarding position being taken by Nevada Energy and issues related to stay (.5). Work on Safe Harbor Rule 11 letter to Todd Bice (.3). Telephone conference with Todd Bice rejecting request to stay proceedings (.4).	1.90	760.00
	TMS	Call with client (0.25); review offer re stay pending settlement discussions with NV Energy (0.25)	0.50	140.00
11/01/2016	KRR	Commence review and analysis of Switch's opposition to motion to dismiss (.9). Telephone conference with Garrett Weir regarding position being taken by PUCN on accusations made in Switch's opposition (.3). Telephone conference with Nick Santora (Nevada Energy counsel) regarding positions to be taken by NV Energy in it's motion to dismiss (.4). Work on retention letter and engagement confirmation for Professor Hancock regarding expert services (.6). Redraft engagement letter per Hancock's directions (.2). Email traffic with client and telephone conferences concerning timeline of events relative to use of user names and passwords for each social media platform account (.5). Start draft of Tanner's reply in support of motion to dismiss (.3).	3.20	1,280.00
	TMS	Review opposition to motion to dismiss and countermotion for continuance (1); research re whether contents of public records are subject to judicial notice (1); outline argument of reply re court may properly take judicial notice of and consider exhibits on motion to dismiss (1.05); call with client (0.25); research re whether personal social media postings are acting under color of state law to support a 1983 claim (2); research re whether absolute immunity extends to private counsel and/or employees (1); outline reply ISO motion to dismiss (1); draft argument portion of reply ISO motion to dismiss re court may properly take judicial notice of exhibits (1.3)	7.60	2,128.00
11/02/2016	KRR	Telephone conference with Garrett Weir regarding Switch's		

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		HOURS	
		2.50	1,000.00
	TMS	7.00	1,960.00
11/03/2016	TMS	2.00	560.00
11/04/2016	TMS	0.20	56.00
11/07/2016	TMS	5.20	1,456.00
11/08/2016	KRR	2.40	960.00
	TMS	0.30	84.00
11/09/2016	KRR	3.10	1,240.00
	TMS	0.40	112.00
11/10/2016	KRR	1.80	720.00
11/11/2016	KRR		

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		HOURS	
	request. Receive, review Commissioner's Declarations. Finalize opposition. Organize and index exhibits. Prepare affidavit in support of opposition. Finalize and file.	2.80	1,120.00
11/15/2016	TMS Research when rule 11 sanctions are appropriate (0.6); outline rule 11 motion (0.3); begin draft argument portion re no evidentiary support (0.4)	1.30	364.00
11/16/2016	KRR Work on second anti-SLAPP motion. Work on Rule 11 motion and cover letter compliant with FRCP 11 Safe Harbor Provisions. Telephone conference with Garret Weir and Haley.	1.00	400.00
	TMS Analyze grounds for moving forward to recover costs expended (0.2); finish draft argument portion of Rule 11 re no evidentiary support (2); draft argument of Rule 11 re no legal basis (1); draft argument portion of Rule 11 re improper purpose (2); edit Rule 11 motion (1); edit anti-SLAPP motion to convert into new anti-SLAPP motion (0.7)	6.90	1,932.00
11/22/2016	TMS Review reply	0.30	84.00
11/23/2016	TMS Incorporate KRR edits into motion for anti-SLAPP (1); edit motion for anti-SLAPP (2.5); draft KRR letter re Rule 11 (0.5); edit Rule 11 motion (1); additional edits to anti-SLAPP (0.5); emails re Rule 11 motion (0.25)	5.75	1,610.00
11/25/2016	KRR Redrafted Rule 11 letter to Bice.	0.80	320.00
	KRR Proofed second anti-SLAPP motion and finalized corrections.	0.90	360.00
	FOR CURRENT SERVICES RENDERED	57.85	18,646.00

EXPENSES THROUGH 11/25/2016

11/18/2016	In house photocopy expense.		3.75
11/23/2016	Check issued to Thomson Reuters - West		
	Legal research.		925.75
	TOTAL EXPENSES		929.50
	TOTAL CURRENT WORK		19,575.50

PAYMENTS THROUGH 12/08/2016

11/14/2016	Cost payment.		-8.83
11/14/2016	Fee payment.		-33,906.00
12/07/2016	Cost payment.		-274.22
12/07/2016	Fee payment.		-16,573.00
	TOTAL PAYMENTS		-50,762.05
	BALANCE DUE		<u>\$19,575.50</u>

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