

SUPERIOR COURT
STATE OF ARIZONA

2019 JUL -2 PM 04 ✓

SANDRA K HARRHART CLERK

BY: T SENA

1 J. Jeffrey Coughlin (013801)
2 **J. JEFFREY COUGHLIN PLLC**
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4 Prescott, Arizona 86303
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6 Facsimile: (928) 778-5891
7 j.coughlin@azbar.org
8 Attorney for Plaintiffs

9
10 IN THE SUPERIOR COURT FOR THE STATE OF ARIZONA
11 IN AND FOR THE COUNTY OF YAVAPAI

12 JOHN B. CUNDIFF and BARBARA C.
13 CUNDIFF, husband and wife; ELIZABETH
14 NASH, a married woman dealing with her
15 separate property; KENNETH PAGE and
16 KATHRYN PAGE, as Trustee of the Kenneth
17 Page and Catherine Page Trust,

18 Plaintiffs,

19 vs.

20 DONALD COX and CATHERINE COX,
21 husband and wife,

22 Defendants.

CASE NO. P1300CV20030399

**AFFIDAVIT OF J. JEFFREY
COUGHLIN IN SUPPORT OF
APPLICATION FOR
ATTORNEYS' FEES AND
COSTS**

23 STATE OF ARIZONA)
24) ss.
25 County of Yavapai)

1. I am an attorney for the Plaintiffs in this action.

2. I have been substantially involved in this case and have personal knowledge of
the legal services rendered by my firm from April 2009 to the present.

3. I billed 252 hours in connection with this matter. I am currently practicing law in
Prescott, Arizona as a solo practitioner with J. Jeffrey Coughlin PLLC. My principal area of
practice is civil litigation. I have been licensed to practice law in the State of Arizona since
1992.

1 4. My paralegal, Christi Padilla, billed 198.8 hours and my former paralegal, AJ
2 Nelson, billed 50 hours in connection with this matter.

3 5. The Client has agreed to or has paid the hourly billing rates for myself and my
4 paralegals. The current hourly billing rates are:

<u>Attorney</u>	<u>Hourly Rate</u>
JJC = J. Jeffrey Coughlin	\$ 250.00

7
8 The billing rates in this case for paralegals are:

AJ = AJ Nelson	\$ 95.00
CP = Christi Padilla	\$ 95.00

9
10
11 I consider these billing rates to be reasonable, given due consideration to my ability,
12 training, education, experience, skill and professional standing, the intricacy and difficulty of the
13 work performed, the time and skill required, the responsibility imposed and the result obtained.
14 These hourly rates are also comparable to the hourly rates prevailing in this community for
15 similar work.

16 6. Attached to this Affidavit as Exhibit 1 is an itemization of legal services rendered
17 in this matter. This itemization was provided from billing records which are regularly prepared
18 in the course of firm business.

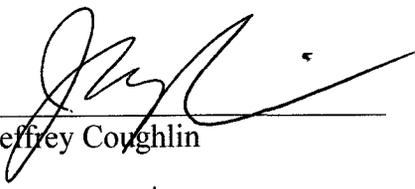
19 7. The Client has paid or agreed to pay the total charges for the itemized services set
20 forth in Exhibit 1.

21
22 8. As a result of this action, the Client has incurred legal fees for services rendered
23 by my firm in the amount of \$86,636.00 and costs in the amount of \$2,772.63.

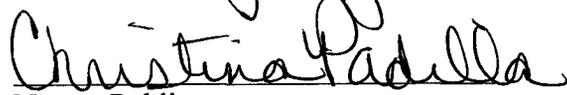
24 9. I spent an additional 23.8 hours (\$5,950.00) preparing the application for
25 attorney fees and non-taxable costs, Notice of Taxable costs for the Favour firm and my firm

1 and this affidavit. My assistant, Christi Padilla, spent 14.3 hours (\$1,358.50) in the preparation
2 of these documents.

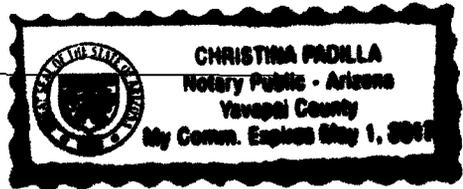
3 10. In my opinion, the expenses and services set forth in Exhibit 1 were actually,
4 reasonably and necessarily incurred in the prosecution of this action. No time spent in this
5 action was wasted, inappropriate or unnecessary.

6
7
8 
J. Jeffrey Coughlin

9
10 SUBSCRIBED AND SWORN to before me this 2nd day of July, 2013 by
11 J. Jeffrey Coughlin.

12 
13 Notary Public

14 My Commissions Expires:



LAW OFFICES OF J. JEFFREY COUGHLIN, PLLC

114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer ID #264381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

Page: 04/14/2009
 Account No: 90940-05
 Statement No: 155

Fees

		Hours	
04/07/2009	JC	Reviewed Judge Mackey's August 2008 decision re: joinder plan and met with Alfie Ware in Prescott Valley re: how to proceed	1.50 375.00
04/09/2009	JC	Telephone conference with Alfie re: meeting with him and Ce Ce to discuss plan for joinder and reviewed file to locate Plan for Joinder	0.20 50.00
	JC	Telephone conference with Ce Ce re: Cundiff matter, reviewed file for Judge Mackey's rationale for ordering joinder and telephone conference with Ce Ce to discuss whether to join or allow to be dismissed	1.10 275.00
04/10/2009	JC	Reviewed Court of Appeals Memorandum Decision, Plaintiff's Plan for Joinder of Property Owners Subject to Restrictive Covenants, Defendant's Response to Plaintiff's Legal Memorandum Re: Joinder Under Rule 19 of All Coyote Springs Property Owners Subject to Recorded Covenants, Plaintiff's Reply Judge Mackey's August 22, 2008 Ruling re: joinder, other rulings preceding 2008, correspondence between counsel and legal research re: joinder vs class action to prepare for meeting with Alfie and Ce Ce to advise them how to proceed(2.8) Conference with Alfie and Ce Ce re: advice on whether to proceed by class action or joinder(2.3)	5.60 1,400.00
04/13/2009	JC	Legal research re: requirements for class action and determining necessary prerequisites for Rule 23(b)(1),(2) or (3), the procedure the court follows under 23(c),(d) and (e) and compared with Motions for Summary Judgment on issues of agricultural exemption and business use in violation of Covenants, Conditions and Restrictions(2.6) Conference with Ken and Katheryn Page, John and Barbara Cundiff and Ce Ce Ware re: issues related to pursuing case as a class action or by joinder, the issues raised by Judge Mackey in his August 2008 ruling, the issues raised in Court of Appeals 2007 decision and the positions of the parties on abandonment, the risk of allowing case to be dismissed and the prospect of attorneys' fees upon winning or losing(2.5) telephone conference with Alfie Ware re: conference with the parties and plan for proceeding(.2)	5.30 1,325.00
		For Current Services Rendered	13.70 3,425.00

Alfie Ware

Coyote Springs

Account No:
Statement No:

Pa
04/14/
90940-

Timekeeper
J. Jeffrey Coughlin

Recapitulation

Hours
13.70

Rate
\$250.00

Total
\$3,425.00

Total Current Work

Balance Due

3,425.

\$3,425.

This statement includes all payments received through the last day of the previous month.

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Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

Page: 1
05/19/2009
Account No: 90940-05M
Statement No: 1634

Previous Balance \$3,425.00

Fees

		Hours	
04/15/2009			
JC	Telephone conference with Alfie re: when I will be substituting, reviewed Adams' Motion to Lift Stay and David's Response and called Alfie to advise	0.40	100.00
04/23/2009			
JC	Telephone conference with Alfie W. re: when I can substitute in as counsel, reviewed Motion to Lift Stay, Response and called Clerk of Superior Court to see if Reply filed by Adams(.3) reviewed Reply filed by Adams on 4/17/09, compared with David W's response and Judge Mackey's ruling from August 2008 to advise clients(.4)	0.70	175.00
CP	Draft engagement letter to Ken and Kathy Page	0.30	28.50
CP	Draft engagement letter to John and Barbara Cundiff	0.20	19.00
04/24/2009			
JC	Conference with Alfie W. re: status of pleadings on lifting the stay (.2) Telephone conference with Judge Mackey's assistant re: status of lifting stay, learned that stay lifted effective today and telephone conference with Alfie re: same and need for immediate substitution(.3)	0.50	125.00
04/27/2009			
CP	Draft Motion of Substitution of Counsel, client consents, telephone conference with Kathy Page regarding consent, telephone conference with Becki Nash regarding same	1.20	114.00

Alfie Ware

Coyote Springs

Page: 2
05/19/2009
Account No: 90940-05M
Statement No: 1634

		Hours	
04/29/2009	JC	Telephone conference with Becky Nash re: status of suit, reason for substitution and procedural history of case(.4) telephone conference with Judge Mackey's assistant re: obtaining signature on Order from Judge Mackey and e-mail to Marguerite Kirk re: when file will be available(.2)	0.60 150.00
	CP	Legal research re: Prerequisites to a Class Action, Rule 23 ARCP	2.00 190.00
	CP	Telephone conference with Kathy Page regarding consent from Becki Nash, conference with J. Jeffrey Coughlin regarding same	0.20 19.00
	CP	Complete Motion and Order for Substitution of Counsel, hand-deliver to Cheryl at Judge Mackey's office	0.40 38.00
	CP	Create list of client names and contact information to include in file, telephone conference with Cheryl at Judge Mackey's office regarding Order Granting Substitution of Counsel, draft engagement letter to Becki Nash	0.50 47.50
04/30/2009	CP	Letters to clients transmitting Order Granting Substitution of Counsel, scan and e-mail same to Marguerite Kirk at Dave Wilhelmsen's office	0.50 47.50
	CP	Review materials obtained regarding certification of Class Action, conference with J. Jeffrey Coughlin regarding prerequisites to Class Action	0.60 57.00
05/05/2009	CP	Review documents delivered by Favour, Moore & Wilhelmsen, organization of same	4.40 418.00
05/06/2009	CP	Review of additional documents delivered by Favour Moore & Wilhelmsen, organization of same	2.50 237.50
05/07/2009	CP	Telephone conference with Alfie Ware requesting Coyote Springs property owner information	0.10 9.50
	CP	Conference with J. Jeffrey Coughlin re: steps to take to begin class action, review of research information re: same	0.40 38.00
05/08/2009	JC	Reviewed Judge Mackey's rulings re: joinder and began preparing Motion to Amend Complaint to add count for class action(4.2) telephone conference with Alfie Ware re: status of class action(.1)	4.30 1,075.00
05/11/2009	JC	Reviewed pleadings and Revision of Motion to Amend First	

Alfie Ware

Coyote Springs

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05/19/2009
Account No: 90940-05M
Statement No: 1634

		Hours	
	Amended Complaint to comply with class action requirements of Rule 23	1.90	475.00
CP	Draft Second Amended Complaint - Complaint in Class Action, telephone conferences with Rebecca at Favour, Moore & Wilhelmsen re: Plaintiffs' First Amended Complaint, draft Motion for Order Determining that Action May Be Maintained as a Class Action, Order Determining that Action and Directing Notice to Class, Notice to Members of Class	3.40	323.00
05/14/2009			
CP	Revision of Class Action Complaint to include text of Plaintiff's First Amended Complaint, telephone conference with J. Jeffrey Coughlin re: same	<u>2.20</u>	<u>209.00</u>
	For Current Services Rendered	27.30	3,895.50

Recapitulation

Timekeeper	Hours	Rate	Total
Christi Padilla	18.90	\$95.00	\$1,795.50
J. Jeffrey Coughlin	8.40	250.00	2,100.00

Total Current Work 3,895.50

Payments

05/01/2009	Payment	-3,425.00
	Balance Due	<u>\$3,895.50</u>

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

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Phone number (928) 445-7137
Taxpayer ID #26-4381817

Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

Page: 1
06/17/2009
Account No: 90940-05M
Statement No: 1711

Previous Balance \$3,895.50

Fees

Hours

05/19/2009	JC	Revision of Proposed Second Amended Complaint to attach to Motion to Amend First Amended Complaint to convert to class action(2.4)	2.40	600.00
	CP	Revision of red-lined version of Class Action Complaint to meet Court's requirements	1.20	114.00
05/20/2009	JC	Final revisions to Motion to Amend and Proposed Second Amended Complaint and gave instructions to paralegal to file in Superior Court, copy to Judge Mackey and mail to opposing counsel	1.90	475.00
	CP	Conference with J. Jeffrey Coughlin re: changes to Motion to Amend Complaint, Second Amended Complaint, final preparation of both, preparation of exhibits to same	1.40	133.00
05/21/2009	CP	Letter to clients transmitting Motion to Amend First Amended Complaint	0.20	19.00
	JC	Telephone conference with Ce Ce re: duplicative work performed by Wilhelmsen firm and whether absolute right to remove trial judge exists following appeal and substantive hearing before Judge Mackey	0.20	50.00
06/09/2009	CP	Letter to clients transmitting Defendants' Response to Motion to Amend Complaint, calendar deadline for Reply	0.30	28.50

Alfie Ware

Coyote Springs

Page: 2

06/17/2009

Account No: 90940-05M

Statement No:

1711

Hours

06/10/2009	JC	Reviewed Adams Response to Motion to Amend Complaint, began legal research re: cases cited in Adams response and started outline for reply	2.20	550.00
06/11/2009	JC	Additional legal research re: arguments raised in Defendant's Response to Plaintiff's Motion to Amend First Amended Complaint and prepared Reply in Support of Plaintiff's Motion to Amend First Amended Complaint	3.60	900.00
06/12/2009	JC	Revised and authorized the filing of Plaintiffs' Reply in Support of Motion to Amend First Amended Complaint	2.10	525.00
		For Current Services Rendered	<u>15.50</u>	<u>3,394.50</u>

Recapitulation

Timekeeper	Hours	Rate	Total
Christi Padilla	3.10	\$95.00	\$294.50
J. Jeffrey Coughlin	12.40	250.00	3,100.00

Expenses

06/09/2009	Photocopy charges	10.20
06/09/2009	Postage	
	Total Expenses	<u>10.20</u>
	Total Current Work	3,404.70

Payments

05/29/2009	Payment	-3,895.50
	Balance Due	<u>\$3,404.70</u>

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114 S. Pleasant Street
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Page: 1
 07/17/2009

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Account No: 90940-05M
 Statement No: 1786

Attn: Alfie Ware

Coyote Springs

Previous Balance \$3,404.70

Fees

		Hours	
06/22/2009			
JC	Voice mail from Alfie W. re: article in Courier re: assessor cracking down on bogus agricultural exemptions, located article, read and printed it for file	0.30	75.00
07/07/2009			
JC	Re-read Courier article on Assessor Tightening Belt on Agricultural Exemptions, compared with Court of Appeals ruling on business uses and reviewed Yavapai County Agriculture Guidelines to determine if defendant's status can be challenged	0.40	100.00
	For Current Services Rendered	0.70	175.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
J. Jeffrey Coughlin	0.70	\$250.00	\$175.00

Total Current Work 175.00

Payments

07/10/2009 Payment -3,404.70

Balance Due \$175.00

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

Page: 1
 08/19/2009
 Account No: 90940-05M
 Statement No: 1870

Previous Balance \$175.00

Fees

		Hours	
07/17/2009	CP		
	Review Order Granting Permission to Amend Complaint, conference with J. Jeffrey Coughlin re: same, letter to clients transmitting copy of same	0.30	28.50
07/22/2009	CP		
	Create clean version of Second Amended Complaint for filing, preparation of exhibits to same	1.40	133.00
	JC		
	Compared proposed 2d Amended Complaint with deletions and additions to clean copy for filing with the court	0.50	125.00
07/24/2009	JC		
	Letter from Mark Drutz to Dave Wilhelmsen re: consolidation of Varilek v Veres with Cundiff v Cox and conference with Mark Drutz re: property split issues in that case which violate the Covenants, Conditions and Restrictions(.3) Letter from Jeff Adams re: no objection to consolidation and attempted to access Varilek case on Arizona Judicial Branch Public Access Website to determine issues in that case(.2)	0.50	125.00
08/04/2009	CP		
	Telephone conferences with all clients to schedule conference call, conference with J. Jeffrey Coughlin re: same, e-mail to all clients confirming conference call	0.70	66.50
	JC		
	Letter from Mark Drutz re: whether will stipulate to consolidating Varilek and Veres cases with ours, attempted to locate case on Arizona Judicial Branch Public Access website and gave		

Alfie Ware

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08/19/2009
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Account No:
Statement No:

Coyote Springs

Hours

	instructions to paralegal to arrange conference call with clients to discuss and letter to Mark Drutz, Jeff Adams and clients(.4) letter to David Wilhelmsen re: meeting with clients to discuss consolidation(.2)	0.60	150.00
CP	Telephone conference with David Wilhelmsen's office requesting copies of Complaints in Case Nos. CV2009-0816 and CV2009-0822	0.30	28.50
08/05/2009			
JC	Telephone conference with Alfie re: consolidating cases(.1) Letter from David Wilhelmsen refusing Mark Drutz' request to stipulate to consolidating Varilek with Cundiff and researched Rule 42 for any contrary language(.3)	0.40	100.00
08/06/2009			
CP	Telephone conference with Rebecca at David Wilhelmsen's office regarding Complaints in Varilek matters, review e-mail from Rebecca containing same, conference with J. Jeffrey Coughlin re: same	0.70	66.50
CP	Telephone conference with Court clerk re: Varilek matters, preparation of documents for J. Jeffrey Coughlin use at 8/6/2009 conference call	0.70	66.50
JC	Reviewed complaints by Varilek against Veres and Van Dykes, compared with our class action complaint and Wilhelmsen's initial complaint in this case to discuss with clients and researched class action rules to determine if any disadvantages in consolidating cases re: illegal lot splits(.8) conference call with the Cundiffs, Pages and Rebecca Nash re: whether they will agree to consolidate the Varilek cases with the class action(.5)	1.30	325.00
CP	Conference with J. Jeffrey Coughlin re: Defendants' Second Set of Non-Uniform Interrogatories and Requests for Production, begin response to same	0.60	57.00
08/07/2009			
JC	Letter to Mark Drutz, Wilhelmsen, Adams with copies to clients and Wares re: request for consolidating cases	0.40	100.00
08/12/2009			
JC	Reviewed e-mail from the Cundiffs re: court of appeals ruling in May 2007	0.20	50.00
	For Current Services Rendered	8.60	1,421.50

Recapitulation

Timekeeper
Christi Padilla

Hours
4.70

Rate
\$95.00

Total
\$446.50

Alfie Ware

Coyote Springs

Page: 3
08/19/2009
Account No: 90940-05M
Statement No: 1870

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
J. Jeffrey Coughlin	3.90	250.00	975.00
Total Current Work			1,421.50
Balance Due			<u>\$1,596.50</u>

This statement includes all payments received through the last day of the previous billing month.

Alfie Ware

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09/17/2009
90940-05M
1953

Account No:
Statement No:

Coyote Springs

		Hours	
	Page, Barbara Cundiff and John Cundiff for any reference to such facts, reviewed photos for such reference all for purposes of responding to the interrogatories and Request for Production of Documents	3.10	775.00
09/02/2009	JC Telephone conference with Alfie W. re: his recollection of additional residential structures and bathroom facilities on Coyote Springs Ranch property(.1) Prepared responses to Interrogatories re: counts II and III of Second Amended Complaint(.4)reviewed John Cundiff's deposition again for reference of J-Johns on the property and telephone conference with John and Barbara Cundiff re: recollection of seeing the J-Johns on the property and additional living structures(.4) reviewed parcel map of Coyote Springs Ranch, located current owner of Cox parcel (High C's, LLC) and printed LLC amendments, name changes, Articles of Organization and Publication of Articles(.4) Reviewed and revised responses to Non-uniform Interrogatories and Request for Production of Documents(.2)	1.50	375.00
	CP Conference with J. Jeffrey Coughlin re: Response to Non-uniform Interrogatories and Request for Production, draft same, prepare Verification re: same	0.80	76.00
	CP E-mail Response to Non-uniform Interrogatories and Request for Production and Verification page to John Cundiff, telephone conference with Mr. Cundiff re: same, letter to Jeff Adams transmitting Response, meet with John Cundiff to review and notarize Verification page	0.70	66.50
09/14/2009	CP Review of e-mail from Sharon Sargent-Flack requesting file documents, scan and e-mail requested documents	0.30	28.50
	For Current Services Rendered	12.30	2,005.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	6.90	\$95.00	\$655.50
J. Jeffrey Coughlin	5.40	250.00	1,350.00

Total Current Work 2,005.50

Payments

09/16/2009 Payment -1,771.50

Alfie Ware

Coyote Springs

Page: 3
09/17/2009

Account No: 90940-05M
Statement No: 1953

Balance Due

\$1,830.50

This statement includes all payments received through the last day of the previous billing month.

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 Prescott, Arizona 86303
 Phone number (928) 445-7137
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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Page: 1
 10/16/2009
 Account No: 90940-05M
 Statement No: 2053

Attn: Alfie Ware

Coyote Springs

Previous Balance \$1,830.50

Fees

Hours

09/22/2009 CP	Review class action research documents re: Motion to Certify; Draft Motion to Certify and Order Determining Class	1.80	171.00
09/29/2009 JC	Reviewed defendant's Motion to Deny Class Action Certification and Motion to Order Joinder, compared with Court of Appeals decision and Judge Mackey's rulings, conducted additional legal research re: satisfying elements of Rule 23 and began preparation of objection and Motion to Certify Class Action	3.70	925.00
10/01/2009 JC	Completed Objection to plaintiff's Motion for Order Denying Class Action Classification and Certification and Motion for Order Re:: Compliance with Order re:: Joinder and Cross Motion to Certify as Class Action(4.3) preparation of proposed Order of Certification for Judge Mackey to sign if he allows certification(.3)	4.60	1,150.00
	For Current Services Rendered	10.10	2,246.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	1.80	\$95.00	\$171.00
J. Jeffrey Coughlin	8.30	250.00	2,075.00

Total Current Work 2,246.00

Alfie Ware

Coyote Springs

Page: 2
10/16/2009
Account No: 90940-05M
Statement No: 2053

Payments

09/25/2009	Payment	-1,830.50
	Balance Due	<u>\$2,246.00</u>

This statement includes all payments received through the last day of the previous billing month.

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Attn: Alfie Ware

Coyote Springs

Page: 1
11/23/2009
Account No: 90940-05M
Statement No: 2130

	Previous Balance		\$2,246.00
		<u>Payments</u>	
11/13/2009	Payment		-2,246.00
	Balance Due		<u>\$0.00</u>

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Attn Alfie Ware

Coyote Springs

Page: 1
 02/03/2010
 Account No. 90940-05M
 Statement No. 2271

Fees

		Hours	
12/14/2009	JC		
	Review minute entry setting oral argument for 3/15/2010, calendar same, reviewed Motion to Consolidate Varilek vs. Veres with Cundiff vs Cox, compared with rulings by Judge Mackey and legal research re cases cited in motion to determine if necessary to object	0.90	225.00
01/29/2010	JC		
	Reviewed Reply in Support of Motion to Consolidate Varilek vs. Veres case with Cundiff vs Cox case and legal research re cases cited therein	0.70	175.00
	For Current Services Rendered	<u>1.60</u>	<u>400.00</u>

Recapitulation

Timekeeper	Hours	Rate	Total
J Jeffrey Coughlin	1.60	\$250.00	\$400.00

Expenses

12/09/2009	Long distance telephone charges - conference call	<u>166.31</u>
	Total Expenses	<u>166.31</u>
	Total Current Work	566.31
	Balance Due	<u><u>\$566.31</u></u>

Alfie Ware

Coyote Springs

Page 2
02/03/2010

Account No: 90940-05M
Statement No: 2271

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Attn: Alfie Ware

Page: 1
03/09/2010
Account No: 90940-05M
Statement No: 2436

Coyote Springs

Interim Statement

Previous Balance \$566.31

Fees

		Hours	
02/01/2010	JC		
	Message from Alfie re: Horses with HEART, reviewed article in Courier re: same and telephone call to Alfie re: strategy	0.30	75.00
02/02/2010	JC		
	Telephone conference with Alfie re: attending Planning and Zoning Meeting re: Horses with HEART, who will attend and what to say (.1) reviewed Yavapai County Zoning information re: uses, permits and legal classification and located Covenants, Conditions and Restrictions language prohibiting business use and Court of Appeals language and searched Arizona Revised Statutes for definitions of business (1.7)	1.80	450.00
02/03/2010	JC		
	Attended Planning and Zoning Commission on Horses with HEART application for use permit and spoke to the commission re: pending litigation	2.50	625.00
02/04/2010	JC		
	Message from Jeff Sparks re: whether clients are willing to discuss working with HEART to find a way to use the Coyote Springs property, reviewed Courier comments to date on the matter and telephone call to Jeff Sparks to discuss	0.50	125.00
02/08/2010	JC		
	Telephone call from Alfie Ware re: update on public response to		

Alfie Ware

Coyote Springs

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03/09/2010
Account No: 90940-05M
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		Hours	
CP	Horses with Heart and reviewed Courier for additional comments	0.40	100.00
	Conference with J. Jeffrey Coughlin re: Wednesday, February 10, 2010 conference call, telephone conferences with Pages, Cundiffs and Becki Nash to coordinate same	0.90	85.50
02/09/2010			
CP	Schedule conference call with AT&T Operator, conference with J. Jeffrey Coughlin re: same, confirm conference call with clients via e-mail	0.80	76.00
02/10/2010			
JC	Conference call with John and Barbara Cundiff, Ken and Kathy Page and Alfie Ware re: their position on Horses with HEART (.5) voice mail to Jeff Sparks and telephone call from Jeff Sparks and relayed my clients' inability to agree to Horses with HEART locating their business in Coyote Springs (.2)	0.70	175.00
02/11/2010			
JC	Telephone conference with Alfie W. re: conversation I had with Jeff Sparks of Horses with HEART after our conference call yesterday and advised him to monitor the Planning and Zoning agendas for next month to see if they plan to appear again	0.10	25.00
	For Current Services Rendered	8.00	1,736.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	1.70	\$95.00	\$161.50
J. Jeffrey Coughlin	6.30	250.00	1,575.00

Total Current Work 1,736.50

Payments

02/18/2010 Payment -566.31

Balance Due \$1,736.50

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I.D. # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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 04/12/2010

Account No: 90940-05M
 Statement No: 2542

Previous Balance \$1,736.50

Fees

		Hours	
03/01/2010	JC Telephone call from Kathy Page re: a couple of businesses in Coyote Springs not getting renewal licenses from Yavapai County	0.20	50.00
03/10/2010	CP Preparation of file for J. Jeffrey Coughlin use at 3/15/2010 oral argument, summarize and create index for all new pleadings	0.80	76.00
03/12/2010	JC Researched all cases cited in pleadings re: class action certification and elements of Rule 23 which apply to this case to prepare for oral argument on Monday	2.70	675.00
03/15/2010	JC Additional preparation for oral argument on class action certification and attended oral argument	2.80	700.00
	For Current Services Rendered	<u>6.50</u>	<u>1,501.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	0.80	\$95.00	\$76.00
J. Jeffrey Coughlin	5.70	250.00	1,425.00

Expenses

03/09/2010 Conference call 188.29

Alfie Ware

Coyote Springs

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04/12/2010
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Account No:
Statement No:

Total Expenses 188.29

Total Current Work 1,689.29

Payments

04/06/2010 Payment -1,736.50

04/06/2010 Payment 0.00

Total Payments -1,736.50

Balance Due \$1,689.29

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LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
Prescott, Arizona 86303
Phone number (928) 445-7137
Taxpayer I.D. # 26-4381817

Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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05/03/2010
Account No: 90940-05M
Statement No: 2568

Previous Balance	\$1,689.29
Balance Due	<u>\$1,689.29</u>

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF ANNA YOUNG PLLC

114 S. Pleasant Street
Prescott, Arizona 86303
Phone number (928) 445-7137
Taxpayer I.D. # 20-8258718

Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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06/02/2010
Account No: 90940-05M
Statement No: 2658

Previous Balance \$1,689.29

Fees

		Hours	
05/11/2010			
JC	Brief review of Under Advisement ruling re: class action and proposed order, and gave instructions to paralegal to arrange a conference call with clients	0.30	75.00
CP	Conference with J Jeffrey Coughlin re decision on class action, e-mail to client requesting availability for telephonic conference with J. Jeffrey Coughlin	0.40	38.00
05/12/2010			
JC	Message from John Cundiff re: teleconference on Friday, called Christi re: status and telephone call to John C. to advise	0.20	50.00
05/13/2010			
CP	Conference with J. Jeffrey Coughlin re: scheduling of conference call, e-mail to clients re: same	0.30	28.50
JC	Telephone conference with Alfie Ware re: Judge Mackey's decision on class certification and scheduling of conference call tomorrow to discuss with all clients	0.20	50.00
CP	Finalize arrangements for 5/14/2010 conference call, confirm with Kathy Page	0.50	47.50
CP	E-mail Ruling from Judge Mackey to all clients, telephone conference with all clients re: same	0.30	28.50
05/14/2010			
AJ	assist J. Jeffrey Coughlin in calculating cost for service on all parties	1.00	95.00
JC	Reviewed Under Advisement Ruling and proposed Notice and		

Alfie Ware

Coyote Springs

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06/02/2010
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Hours

	calculated expense and procedure for joining all other property owners in Coyote Springs in preparation for conference call with clients (1.8) conference with Barbara and John Cundiff, Kathy and Ken Page, Becky Nash, Ce Ce Ware and Alfie Ware to explain Judge Mackey's decision and strategy for proceeding (1.3) researched Yavapai County Recorder's Office for Phase I and Phase II property descriptions to ensure we serve all appropriate property owners(1.4)	4.50	1,125.00
05/17/2010	CP Telephone conference with Carolyn at Yavapai County Assessor's office re: Coyote Springs Owners' List, research Yavapai County Assessor's Office website re: same, telephone conference with J. Jeffrey Coughlin re. obtain Phase II CC&Rs from Alfie Ware for comparison to Phase I CC&Rs	0.80	76.00
	CP Conference with J. Jeffrey Coughlin re: Phase I and Phase II CC&Rs, telephone conference with Alfie Ware re: same	0.20	19.00
05/18/2010	JC Email from John Cundiff to Alfie re: Court of Appeals statements about Cox operation of a business and compared with Court of Appeals opinion	0.10	25.00
05/19/2010	CP Telephone conference with Carolyn at Yavapai County Assessor's office re: Coyote Springs Phase I Property Owners List	0.20	19.00
05/20/2010	CP Telephone conference with Carolyn at County Assessor's office re: Coyote Springs Phase I property owners' list, conference with J. Jeffrey Coughlin re: same, review of legal description, e-mail legal description to Carolyn for her use in preparing property owners' list	0.60	57.00
	JC Message from Jeff Adams today and telephone call to Jeff to discuss modifying notice to property owners and additional discovery	0.30	75.00
05/24/2010	CP Conference with J Jeffrey Coughlin re: Judge Mackey's Under Advisement Ruling, requirements and deadlines for same	0.70	66.50
	CP Draft Notice of Designation of e-mail Addresses	0.20	19.00
05/28/2010	AJ Assist Jeff with changes to Notice and preparation of Notice to Court with changes	0.50	47.50
	JC Reviewed Judge Mackey's proposed notice, reviewed Court of		

Alfie Ware

Coyote Springs

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06/02/2010

Account No:

90940-05M

Statement No:

2658

	Hours	
Appeals ruling re: defense of abandonment, defendant's Answer to First Amended Complaint to determine extent of defendant's affirmative defense of abandonment and prepared proposals to submit to the Court	<u>1.30</u>	<u>325.00</u>
For Current Services Rendered	12.60	2,266.50

Recapitulation		Hours	Rate	Total
<u>Timekeeper</u>				
AJ Nelson		1.50	\$95.00	\$142.50
Christi Padilla		4.20	95.00	399.00
J. Jeffrey Coughlin		6.90	250.00	1,725.00

Expenses

05/18/2010	Property owners list from Assessor	50.00
	Total Expenses	<u>50.00</u>
	Total Current Work	2,316.50

Payments

05/20/2010	Payment	-1,689.29
	Balance Due	<u>\$2,316.50</u>

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I.D. # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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 07/01/2010
 Account No: 90940-05M
 Statement No: 2756

Previous Balance \$2,316 50

Fees

		Hours	
06/03/2010			
JC	Telephone call to AT&T re. invoice for conference call and requested discount	0.20	50.00
06/08/2010			
JC	Conference with Christi Padilla re: list of property owners in Coyote Springs, compared various lists of owners with 2004 map identifying June 1974, July 1974 and December 1974 recordings, viewed county website and gave instructions to paralegal to contact Yavapai County to verify ownership	1 50	375.00
CP	Conference with J. Jeffrey Coughlin re: status, property owners list, review of property map, compare to property description in CC&Rs, e-mail to Carolyn at Yavapai County Assessor's office re: obtaining additional recorded documents from July and December of 1974, review court's minute entry re. requirements for joining parties, substantial progress deadline	2.40	228.00
06/09/2010			
JC	Matched legal description from Covenants, Conditions and Restrictions for Coyote Springs Ranch with Yavapai County map to determine parcels subject to the Covenants, Conditions and Restrictions	1.80	450.00
CP	Review legal description in CC&Rs with J Jeffrey Coughlin to identify parcels in Coyote Springs, Phase I, create spreadsheet containing CC&Rs description and parcel numbers	4.00	380.00

Alfie Ware

Coyote Springs

		Hours	
06/10/2010	JC	Reviewed excel spread sheet Christi Padilla prepared re. parcels and compared with Yavapai County's subdivision maps for accuracy, tried to locate government lots (2.3) telephone call to Yavapai County Assessor's Office and spoke with Josh re government lots location in Coyote Springs and owners of parcels within them and then reviewed legal description and Christi Padilla's excel spread sheet to see if complete (.6)	2.90 725.00
	CP	Continue creating parcel number spreadsheet for Coyote Springs Ranch, Phase 1	3.80 361.00
	AJ	print out property information for parcels	1.25 118.75
06/11/2010	JC	Matched Government Lots referenced in Coyote Springs Covenants, Conditions and Restrictions to parcel map to obtain full list of ownership and gave instructions to paralegal to include in court ordered excel spread sheet	0.80 200.00
	AJ	Preparation of list for government parcels, continue with property owner information	1.50 142.50
06/14/2010	AJ	Complete property owner information for all parcels	3.75 356.25
06/15/2010	AJ	Additional property information research	0.50 47.50
		For Current Services Rendered	<u>24.40</u> <u>3,434.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
AJ Nelson	7.00	\$95.00	\$665.00
Christi Padilla	10.20	95.00	969.00
J Jeffrey Coughlin	7.20	250.00	1,800.00

Total Current Work 3,434.00

Payments

06/22/2010 Payment -2,316.50

Balance Due \$3,434.00

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LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I.D # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

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 Account No: 90940-05M
 Statement No 2945

Attn Alfie Ware

Coyote Springs

Previous Balance \$3,434.00

Fees

Hours

07/15/2010			
CP	Conference with AJ Nelson re: requirements of joinder, review May 6, 2010 Order re: same, begin preparation of Excel spreadsheet containing parcel numbers and property owner information	2.80	266.00
AJ	Conference with J Jeffrey Coughlin and Christi Padilla re: requirements of joinder, review May 6, 2010 Order re: same, begin preparation of Excel spreadsheet containing parcel numbers and property owner information	2.80	266.00
07/16/2010			
AJ	Conference with J Jeffrey Coughlin re: status Preparation of Summons, continue inputting information into Excel spreadsheet containing parcel numbers and property owner information	2.00	190.00
07/19/2010			
JC	Reviewed Judge Mackey's order re: form of notice to be sent to property owners, order re: contents of package to be sent to property owners, excel spread sheet re: Assessor's Parcel Numbers and names and addresses of property owners in Coyote Springs Ranch, legal research re: form for Waiver of Service of Summons and Complaint and Conference with Christi Padilla and AJ re: contents of package to be sent to owners	0.90	225.00
CP	Complete Property Owners Spreadsheet containing all parcel numbers and property owner information obtained from Yavapai County Assessor's Office, draft Notice of Lawsuit, Waiver of Service of Summons	6.40	608.00

Alfie Ware

Coyote Springs

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Hours

07/20/2010	CP	Preparation of Acceptance of Service, Plaintiffs' Notice of Filing Property Owners List, review of court's Under Advisement Ruling re same, conference with J Jeffrey Coughlin re same	1.80	171 00
07/21/2010	CP	Preparation of mailing labels for all landowners in Coyote Springs Ranch, Phase I, had Summons issued at clerk's office, preparation of electronic form of Property Owners List for filing with the Court	2.60	247 00
07/22/2010	JC	Reviewed packet of information to send to Coyote Springs property owners, modified cover letter requesting acceptance of service and gave instructions to paralegal re copying materials and mailing all documents	0 80	200.00
	CP	Purchased supplies for mailing of Notices to Property Owners, preparation of copies for same	2 70	256 50
	CP	Draft letter to property owners re Notice packet, conference with J Jeffrey Coughlin re same	0 40	38 00
07/23/2010	CP	Prepare packets containing letter from J Jeffrey Coughlin, Summons, Acceptance of Service, Notice, First Amended Complaint	4.50	427 50
	AJ	Prepare packets containing letter from J Jeffrey Coughlin, Summons, Acceptance of Service, Notice, First Amended Complaint	4.50	427.50
	JC	Compared Notices from Judge Mackey to packets prepared for mailing, gave instructions to paralegals to prepare all mailings for delivery to post office today, posted and delivered to post office	1 70	425 00
07/26/2010	AJ	Phone conference with property owner re packet, Conference with J Jeffrey Coughlin re same	0 30	28.50
	JC	Telephone call from Eric Cleveland re acceptance of service (2) telephone call from Dessie Bowlin re acceptance of service (.2) Conference with Richard Mancini re acceptance of service(4) telephone call from Christine Wells re acceptance of service (2) voice mail from Joshua Ollinger re acceptance of service and telephone call to Joshua O re same (1) voice mail from Hilda Muraca re acceptance of service and returned call (.2) voice mail from Gina Hatfield re acceptance of service (.2) telephone call from Tom Anderson re acceptance of service (1)	1 60	400.00

Alfie Ware

Account No
Statement No.

Coyote Springs

		Hours	
CP	Telephone conferences with Property Owners re Notice packet	0.80	76.00
07/27/2010			
JC	Message from Christine Andrews re acceptance of service and returned call to discuss (2) telephone call from Dan Sanders re acceptance of service (2) telephone conference with Rosemary James re acceptance of service (.1) telephone call from Dessie Bolen re confusion over issues in case (3) voice mail from Carla Jones re acceptance of service for Margaret Kozlowski (2) Telephone call from Beverly Strissel re packet she received (2) Conference with the Fleetwoods re acceptance of service (.2) telephone call from Jerry Emmerson re acceptance of service (1)	1 50	375 00
CP	Review of Acceptances of Service received from property owners, log same onto spreadsheet, telephone conferences with property owners re packet received in mail	0 80	76 00
AJ	Phone conference with property owners re information received in packet regarding lawsuit	1.00	95.00
07/28/2010			
JC	E-mail and telephone call from Joyce Hattab(3) message from and telephone call to Joy Smith re acceptance of service (3) message from and telephone call to James Wood re: acceptance of service (3) message from and telephone call to Marylyn Dinero re acceptance of service and explanation of what the information in the packet means (4)	1 30	325 00
AJ	Phone conference with property owner's re packet; preparation of acceptance to file with clerk and file same	0 75	71 25
07/29/2010			
JC	Voice mail from Gary Wadsik re acceptance (1) telephone call from Nick Corea re acceptance of service(2) telephone call from Sue Pennington re acceptance of service (2) telephone call from Martin Simone re acceptance of service (2)	0 70	175 00
07/30/2010			
AJ	input all Acceptances received and file with court	1.25	118.75
	For Current Services Rendered	<u>43 90</u>	<u>5,488 00</u>

Recapitulation

Timekeeper	Hours	Rate	Total
AJ Nelson	12.60	\$95.00	\$1,197 00
Christi Padilla	22.80	95.00	2,166.00
J Jeffrey Coughlin	8 50	250.00	2,125.00

Alfie Ware

Coyote Springs

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Expenses

07/22/2010	Photocopy charges - 4064 photocopies of documents to include in Notice packet	399 92
07/22/2010	Mailing supplies for Notice packets	108 77
07/23/2010	Postage for self addressed stamped envelopes to include in packet to property owners	105 60
07/26/2010	Postage - Notice packet mailed to Property Owners	176 25
07/26/2010	Postage - Notice packet mailed to Property Owners	150 40
07/27/2010	Long distance telephone charges, conference call for May 14, 2010	604 90
	Total Expenses	<u>1,545 84</u>
	Total Current Work	7,033 84

Payments

07/29/2010	Payment	-3,434 00
	Balance Due	<u>\$7,033 84</u>

This statement includes all payments received through the last day of the previous billing month

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC
 114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I D. # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Page. 1
 09/16/2010
 Account No: 90940-05M
 Statement No: 3051

Attn: Alfie Ware

Coyote Springs

Previous Balance \$7,033.84

Fees

Hours

08/04/2010				
	JC	Conference with Guadelupe Ramos re: acceptance of service (.1) Conference with Jeanne Hicks, Rene Brainer, Kelly Gregorio and Karen Wilkes to discuss responses they are receiving and how they are processing them with Judge Mackey and filed additional Acceptances of Service (1 1)telephone conference with Sharon Petrone re: acceptance of service (.2)	1 40	350 00
	AJ	input parcel numbers on all Acceptances received, preparation of Acceptances to be filed with court	0 80	76 00
08/05/2010	JC	E-mail from Jeanne Hicks re procedure for handling informal responses to service of packet and researched Rule 19 for alternatives	0.30	75 00
08/09/2010	JC	Telephone call from Noel Fidel re: acceptance of service(.2) telephone call from Linda Hahn re. acceptance of service and other issues in packet she received(5) telephone call from Louise Koller re acceptance of service(.2)	0.90	225.00
	CP	Search Property Owner spreadsheet for parcel numbers belonging to owners returning Acceptance of Service, record date the acceptance was signed for each owner	0 60	57 00
08/11/2010	JC	Telephone call from Linda Hahn re change of mind concerning Covenants, Conditions and Restrictions	0.20	50 00

Alfie Ware

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Statement No

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Coyote Springs

Hours

08/13/2010	JC	Telephone call from Tom and Gwendolin Anderson re. acceptance of service	0.30	75 00
08/16/2010	JC	E-mail from Alfie re: posting a notice countering rumors and telephone call from Alfie re: same	0.20	50 00
08/17/2010	CP	Review of new Acceptances of Service, match to proper Yavapai County Parcel number, conference with J Jeffrey Coughlin re: certified mailings	0.90	85 50
08/18/2010	JC	Voice mail from Jose de Jesus Rico re. Valdez parcel and telephone call to Mr. Rico re: acceptance of service	0 20	50 00
	CP	Conference with J Jeffrey Coughlin re. status of receipt of Acceptances of Service, draft Request for Status Conference, revise same, further discussion with J. Jeffrey Coughlin re: same	1.30	123.50
	JC	Reviewed court orders, service rules, Reviewed and revised Request for Status Conference regarding service of property owners to request a determination that plaintiff's have taken substantial steps to serve them or in the alternative request an extension of time to do so	1.60	400.00
	CP	Preparation of new Acceptances of Service for filing, update excel spreadsheet re: same	0.60	57 00
08/19/2010	AJ	Phone conference with clerk re. Motion for Summary Judgment filed by William Jensen; calendar deadline for response	0.40	38 00
	JC	Telephone call from Mary Vince re. acceptance of service	0.60	150.00
08/23/2010	JC	Telephone call from Alfie Ware re: notice John Cundiff received re. Vanlek case and advised of its meaning	0 20	50 00
		For Current Services Rendered	10.50	1,912 00

Recapitulation

Timekeeper	Hours	Rate	Total
AJ Nelson	1.20	\$95.00	\$114.00
Christi Padilla	3.40	95.00	323.00
J. Jeffrey Coughlin	5 90	250.00	1,475 00

Alfie Ware

Coyote Springs

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09/16/2010
Account No: 90940-05M
Statement No. 3051

	Total Current Work		1,912.00
		Payments	
09/08/2010	Payment		-7,033.84
	Balance Due		<u>\$1,912.00</u>

This statement includes all payments received through the last day of the previous billing month

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

Page: 1
 10/06/2010
 Account No: 90940-05M
 Statement No: 3112

Previous Balance \$1,912.00

Fees

		Hours	
09/01/2010	CP Telephone conference with J Jeffrey Coughlin re Judge Mackey's ruling re: Request for Status Conference, next steps to take re. certified mail	0 30	28.50
09/07/2010	JC Reviewed all pleadings received in Veres and Varilek cases, legal research re: Rule 42 consolidation and reviewed Court of Appeals Decision to prepare for oral argument on Motion to Consolidate (1.1) attended oral argument before Judge Jones on Motion to Consolidate (1.8) voice mail from and letter from Christopher Lonn re: his client Linda Hahn compared with property list and voice mail to Lonn (.1)	3.00	750.00
09/08/2010	JC Reviewed Bill Jensen's request for summary judgment, Arizona Rules of Civil Procedure 56 and prepared response (1.3) telephone call from Courier Reporter Ken Hedler with questions about the lawsuit (.6)	1.90	475.00
09/09/2010	JC Reviewed Judge Mackey's Ruling re: request for expedited status conference and determination that Plaintiffs have taken substantial steps to join all necessary and indispensable parties and compared with original order (1) reviewed high profile website to determine additional owners who have accepted service and those who have filed answers and telephone call to Jeannie Hicks to		

Alfie Ware

Coyote Springs

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10/06/2010
Account No: 90940-05M
Statement No: 3112

		Hours	
	determine if Adams filed answer on behalf of 70 defendants as he stated in court (.4)	0.50	125.00
09/10/2010			
JC	Modified letter to property owners for mailing certified letter to serve remaining 143 owners, discussion with postal employee re mass certified mailing procedure, purchased all necessary envelopes, collected collated and stapled packets, reviewed contents of certified packet and gave instructions to paralegal to begin preparing packets	0.90	225.00
AJ	Conference with J. Jeffrey Coughlin re: mailing new certified packet; preparation of new mailing labels and packet; Conference with postal service re: certified mail, begin preparation for certified mailing packet	2.50	237.50
09/13/2010			
JC	Calculated certified mail cost per packet and gave instructions to paralegal to compare acceptances received by court with the ones we received and submitted to accurately determine those to send certified packets(.3) reviewed Answer of Margaret Kozlowski and compared with Amended Complaint(.1)	0.40	100.00
AJ	Additional Preparation of Packet for service by certified mail	3.50	332.50
CP	Preparation of certified mailing to property owners which have not yet returned Acceptance of Service	6.20	589.00
09/14/2010			
CP	Conference with J. Jeffrey Coughlin re: certified mailing, preparation of two additional packages for new property owners, update Excel spreadsheet re: same	1.20	114.00
CP	Create backer for Acceptances of Service	0.30	28.50
09/15/2010			
JC	Telephone conference with Linda Hahn re: certified letter and an attorney she asked to contact me (.3) telephone conference with Jennifer Fiedler re: her property in foreclosure (.2)	0.50	125.00
CP	Review of Certified Mail receipts and Answer filed by Jeff Adams on behalf of multiple defendants, conference with J. Jeffrey Coughlin re: same, update Excel spreadsheet re: service, review of Arizona Rules of Civil Procedure Rule 4.2 (c) re: Affidavit of Service, draft Affidavit of Service for property owners who accepted Certified Mail	2.60	247.00
09/16/2010			
JC	Telephone call from Laurel Osher re: reason for lawsuit	0.50	125.00
CP	Review of Answer filed by Jeff Adams, update spreadsheet re.		

Alfie Ware

Coyote Springs

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10/06/2010
Account No: 90940-05M
Statement No: 3112

		Hours	
	Answer from Property Owners	1.50	142.50
09/17/2010			
JC	Telephone call from Marilyn Dinaro re: packets received and favors Plaintiffs, wants to join (.6) telephone call from Charles and Billie Hutchinson re: certified mail and that they want to keep the restrictions in place(.4) telephone call from Lucille and Robert Taylor who said that they were told to ignore the first packet I sent them and Jeff Adams spoke at a meeting the Coxes held and told people that they would be responsible for the attorneys' fees if they joined the lawsuit(.5) telephone call to Alfie to advise that we need to join plaintiffs and call a meeting to counter the claims defendants are making (.2)	1.70	425.00
AJ	update excel spreadsheet with new return receipts update Affidavit for filing	1.20	114.00
09/20/2010			
CP	Telephone conferences with Umberto Pimental and Leslie Laird re: Summons packet received via certified mail	0.40	38.00
CP	Receipt of certified mail receipts, update Excel spreadsheet re. same, draft Affidavit of Service re. same	1.60	152.00
JC	Reviewed Affidavit of Service for property owners who signed certified receipts and compared with those who accepted and are represented by Adams	0.60	150.00
09/21/2010			
CP	Telephone conference with various property owners re: summons and notice packet	0.30	28.50
CP	Review of Certified Mail Receipts received, draft Affidavit of Service re: same	0.60	57.00
JC	Telephone call from Marta Maya re: meaning of packet she received (.4) telephone call from Mr Tong re: meaning of packets he received and that this was the first he heard of this (.3) reviewed Affidavit of Service with owners who signed certified receipts (.1)	0.80	200.00
09/22/2010			
JC	Telephone call from Debbie Davis re. meaning of packet she received (.4) Voice mail from Paul Temple re: acceptance he sent and why certified mail, reviewed records and court website and voice mail to Paul T. re: same (.3) telephone call from Linda Hahn's attorney re: status of case, alignment of his client with plaintiffs and strategy for proceeding (.8) reviewed Affidavit of Service for property owners who signed certified receipts (.1)	1.60	400.00

Alfie Ware

Coyote Springs

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 10/06/2010
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		Hours	
09/23/2010			
CP	Update pleadings backer and index, update excel spreadsheet re: certified mail receipts from property owners, create backer for Affidavits of Service	1 40	133.00
CP	Update excel spreadsheet re: new certified letter receipts, preparation of Affidavit of Service re: same	0.40	38.00
09/24/2010			
JC	Reviewed website and calculated number of owners served and appeared and reviewed excel spreadsheet to determine owners of parcels of non ownership according to county, tracked property splits to make sure we have identified all parcel owners	1 10	275.00
AJ	research no record history and compile list of property owners	3.50	332.50
09/27/2010			
JC	Reviewed and revised Affidavit of Service re: certified mail received today and gave instructions to paralegal to file with clerk	0.10	25.00
CP	Review of certified mail receipts received, update spreadsheet re: same, preparation of Affidavit of Service re: same	0.70	66.50
09/28/2010			
AJ	Preparation of packet for additional property owners; update excell spreadsheet	4.50	427.50
JC	Reviewed Daily Courier article and telephone call from Alfie re: next step to take (.2) telephone call to Ken Hedler re: clarification on effect of Judge Mackey's order (.3) E-mail from Noel Hebets and voice mail from Noel Hebets re: Matt Grace and telephone call to Noel H. and discussed status of case (7) legal research re. amending restrictions and whether 33-1801 et seq. (1.1)	2.30	575.00
09/29/2010			
AJ	finalize packets for additional property owners	0.80	76.00
CP	Review of new property owner list, draft Notice of Filing Revised Property Owners List, highlight revised parcels and owners, provide copy to court on paper and electronically	0.80	76.00
CP	Review of certified mail receipts, update excel spreadsheet re. same, prepare Affidavit of Service re. same	0.30	28.50
	For Current Services Rendered	50.50	7,262 00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
AJ Nelson	16 00	\$95.00	\$1,520.00
Christi Padilla	18 60	95.00	1,767.00
J. Jeffrey Coughlin	15.90	250.00	3,975.00

Alfie Ware

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10/06/2010

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Expenses

09/13/2010	Postage - Certified Mail to Property Owners who have not returned Acceptance of Service	919.08
09/14/2010	Expenses for Certified Mail to Property Owners, photocopies, envelopes	228.42
09/20/2010	Postage - Affidavit of Service mailed 9/17/2010	5.19
09/20/2010	Postage - Mailing of Affidavit of Service on 9/20/2010	3.66
09/29/2010	Postage	30.97
	Total Expenses	<u>1,187.32</u>
	Total Current Work	8,449.32

Payments

09/29/2010	Payment	-1,912.00
	Balance Due	<u>\$8,449.32</u>

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I.D. # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

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 11/09/2010
 Account No: 90940-05M
 Statement No: 3238

Attn. Alfie Ware

Coyote Springs

Previous Balance \$8,449.32

Fees

		Hours	
10/07/2010			
CP	Review of unclaimed certified letters returned to us, compare names to those included in Answers filed, update excel spreadsheet re: same	2.20	209.00
AJ	Conference with Christi Padilla re: service of other individuals	0.50	47.50
10/12/2010			
JC	Telephone call from Gary Vredevelde re: what he should be telling his clients at Keller-Williams re: status of lawsuit	0.40	100.00
10/20/2010			
JC	Telephone call from Alfie W re: Courier front page article re: upgrade of septic systems and possible annexation by Prescott Valley and reviewed article	0.20	50.00
10/26/2010			
CP	Create list for all unserved property owners, breakdown of property owners in State, out of State, P.O boxes, etc.; conference with J Jeffrey Coughlin on how to proceed with service, compare all Affidavits and Acceptances of Service to spreadsheet to insure accuracy of unserved property owners list	4.20	399.00
JC	Reviewed list of unserved property owners, Judge Mackey's order re: what to do if unable to serve by acceptance or certified mail and gave instructions to paralegal to organize in way to group those who live in Coyote Springs together for service by process server to discuss with Palmer's Investigative	0.40	100.00

Alfie Ware

Coyote Springs

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11/09/2010
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		Hours	
10/27/2010	CP		
	Conference with J. Jeffrey Coughlin re: service of Robert Veres through Mark Drutz, telephone conference with Mark Drutz office re: same, preparation of summons packet to Mark Drutz for possible acceptance of service	0.70	66.50
10/28/2010	JC		
	Reviewed ruling declining to consolidate Varilek v. Veres case with Cundiff case, Motion for Reconsideration and Response	0.30	75.00
	CP		
	Conference with J. Jeffrey Coughlin re: Judge Jones' decision re: joining with Varilek v. Veres, telephone conference with Laura at Judge Jones office re: same, review of decision, Motion for Reconsideration, conference with J. Jeffrey Coughlin re: same	0.60	57.00
10/29/2010	JC		
	Telephone call from Linda Cook, from South Carolina, who is interested in purchasing a lot in Coyote Springs and discussed issues in lawsuit	0.30	75.00
	For Current Services Rendered	9.80	1,179.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
AJ Nelson	0.50	\$95.00	\$47.50
Christi Padilla	7.70	95.00	731.50
J. Jeffrey Coughlin	1.60	250.00	400.00

Expenses

10/21/2010	Postage	1,071.28
	Total Expenses	1,071.28
	Total Current Work	2,250.28

Payments

10/19/2010	Payment	-8,449.32
	Balance Due	<u>\$2,250.28</u>

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
Prescott, Arizona 86303
Phone number (928) 445-7137
Taxpayer I.D. # 26-4381817

Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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12/09/2010
Account No: 90940-05M
Statement No: 3334

Previous Balance \$2,250.28

Fees

		Hours	
11/02/2010			
CP	Review of documents received from Owners, Karen and Michael Wargo, update excel spreadsheet re: owners served, conference with J. Jeffrey Coughlin re: information for Palmer Investigative Services	0.60	57.00
11/03/2010			
CP	Telephone conference with Ethan Wolfinger re: property owners served with letter and billing statement, conference with J. Jeffrey Coughlin re: same	0.30	28.50
11/09/2010			
CP	Update excel spreadsheet re: Veres acceptance of service, conference with J. Jeffrey Coughlin re: request for Palmers to serve remaining defendants, file management	0.70	66.50
JC	Reviewed list of those to be personally served and called Palmer's Investigative Service to see if we can get discount for multiple parties to be served and spoke with Sheila re: same	0.30	75.00
CP	Conference with J. Jeffrey Coughlin re: Palmer Investigative Services agreement to serve remaining owners, preparation of service packets re: same, telephone conference with Chris at Palmer Investigative Services re: same	1.80	171.00
11/10/2010			
JC	E-mail from Bob Palmer re: personal service issues, reviewed file and and e-mail to Bob re. same	0.20	50.00
CP	Telephone conferences with Palmer Investigative Services re:		

Alfie Ware

Account No:

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Statement No:

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Coyote Springs

Hours

	service of additional owners, conference with J. Jeffrey Coughlin re: each owner (husband and wife) must be served, preparation of additional packets for service	1.20	114.00
CP	File management	0.60	57.00
11/12/2010			
AJ	Phone conference with Kory at Palmers re: service on November 11, 2010; Phone conference with Chris re: out of town service	0.50	47.50
11/15/2010			
CP	Telephone conference with Kory at Palmer Investigative Services re: property owners served, attempted service of additional owners, notes to file re: same	0.80	76.00
CP	Conference with Kevin Sasse (owner) re: questions about lawsuit and summons packet	0.20	19.00
11/17/2010			
CP	Telephone conference with Kory at Palmer Investigative Services re: service of additional property owners	0.20	19.00
11/22/2010			
CP	Update spreadsheet re: Owners served	0.30	28.50
11/29/2010			
JC	Message from Michelle and David Krause re: Coyote Springs and telephone call to Michelle K. re: same to discuss aligning them as plaintiffs because they bought in reliance on the Covenants, Conditions and Restrictions (.6) reviewed answer of Karen and Michael Wargo and reviewed file to see how served (.4) reviewed Notice of Apperance and Request for alignment as Party-Plaintiff re: James Varilek and reviewed notes taken at argument re: motion to consolidate re: position of Varilek (.2)	1.20	300.00
CP	Telephone conference with Kory at Palmer Investigative services re: service of property owners, conference with J. Jeffrey Coughlin re: John Martin, telephone conference with John Martin re: sale of his property in Coyote Springs, name of realtor who handled sale	1.20	114.00
11/30/2010			
CP	Telephone conference with Kory at Palmer Investigative Services re: service of property owners, update spreadsheet re: same	0.60	57.00
	For Current Services Rendered	10.70	1,280.00

Recapitulation

Timekeeper
AJ Nelson

Hours
0.50

Rate
\$95.00

Total
\$47.50

Alfie Ware

Coyote Springs

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Timekeeper
Christi Padilla
J. Jeffrey Coughlin

<u>Hours</u>	<u>Rate</u>	<u>Total</u>
8 50	95.00	807.50
1.70	250.00	425.00

Advances

11/12/2010	Processor fee	
	Total Advances	500.00
		<u>500.00</u>
	Total Current Work	1,780.00

Payments

11/22/2010	Payment	-2,250.28
	Balance Due	<u>\$1,780.00</u>

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I.D. # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

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 01/12/2011
 Account No: 90940-05M
 Statement No: 3451

Attn: Alfie Ware

Coyote Springs

Previous Balance \$1,780.00

Fees

Hours

12/03/2010			
JC	Message from Jim Griset re: status of suit and informed as to same (.5) telephone call from Michelle Krauss re: whether I could join her as plaintiff and strategy for plaintiffs in general (.4)	0.90	225.00
CP	Review list of property owners personally served, update status of all owners' service, conference with J. Jeffrey Coughlin re: status, review of court's order regarding service by publication, telephone conference with Palmer Investigative Services re: status of remaining owners, e-mail list of remaining owners to Palmer Investigative Services for status update	2.10	199.50
12/06/2010			
JC	Telephone call from Albert Ramirez and explained status of suit - he wants Covenants, Conditions and Restrictions to remain	0.20	50.00
12/07/2010			
JC	Reviewed Proposed Order re: Linda J. Hahn's Request for Joinder as a Plaintiff in this action and gave instructions to paralegal to identify all categories of service to date to attach to Motion for Permission to serve remaining owners by publication (.4) telephone call from Leonarda Cardella for explanation for papers served (.2) reviewed Motion for Permission to serve Remaining Owners by Publication and modified as necessary, legal research re: procedure under Arizona Rules of Civil Procedure for service by publication and gave instructions to paralegal to file with court (.6)	1.20	300.00
CP	Review of J. Jeffrey Coughlin notes re: conversations with property		

Alfie Ware

Coyote Springs

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Account No:
Statement No:

		Hours	
	owners regarding their positions on CC&Rs, create spreadsheet for J. Jeffrey Coughlin use in contacting property owners to discuss their willingness to sign affidavit in favor of keeping CC&Rs, conference with J. Jeffrey Coughlin re: same	3.40	323.00
CP	Draft Motion for Permission to Serve Remaining Property Owners by Publication and Order re: same	0.90	85.50
12/08/2010			
CP	Complete review of J. Jeffrey Coughlin notes and spreadsheet regarding his conversations with property owners	0.70	66.50
12/16/2010			
JC	Telephone call from Alfie Ware re question from Cece about joined parties being responsible for fees and costs, advised that court could award none, some, all to some or all parties depending on time of disposition	0.30	75.00
12/17/2010			
JC	Reviewed defendant's Response and Objection to Motion for Extension of Time To Serve Remaining Property Owners by Publication, compared with orders from the court and prepared Reply in Support of Motion to Serve by Publication	2.20	550.00
12/28/2010			
CP	Create new backer for additional pleadings, update index	0.80	76.00
	For Current Services Rendered	12.70	1,950.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	7.90	\$95.00	\$750.50
J. Jeffrey Coughlin	4.80	250.00	1,200.00

Advances

11/30/2010	Processor fee	1,192.70
12/30/2010	Processor fee	642.20
	Total Advances	1,834.90
	Total Current Work	3,785.40

Payments

01/05/2011	Payment	-1,780.00
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Alfie Ware

Coyote Springs

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Account No:

90940-05M

Statement No:

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Balance Due

\$3,785 40

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I.D # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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 02/01/2011

Account No: 90940-05M
 Statement No: 3533

Previous Balance \$3,785.40

Fees

		Hours	
01/03/2011			
JC	Reviewed Joinder in Response and Objection to Motion for Extension of Time to Serve Remaining Property Owners by Publication filed by Veres and compared with pleadings and rulings in Veres case (.3) Reviewed Notice of Assignment of Defendant's Full Interest in Coyote Springs Parcel from Catherine Annette Filippinetti and compared with owner list (.2) reviewed substitution of Noel Hebets as counsel for William Grace in place of Adams and located other owner represented by Hebets and notes relative to discussions with him and Grace (2) reviewed Adams Motion to Withdraw as counsel fro Feddemas and located other withdrawals by Adams to see who he actually represents currently (.3)	1.00	250.00
01/10/2011			
CP	Create backer for Affidavits of Process Server, file management	0 70	66.50
01/28/2011			
JC	Reviewed opinion in Arizona Attorney Magazine re: Covenants, Conditions and Restrictions case, retrieved from library and legal research re: cases cited therein	1 30	325.00
	For Current Services Rendered	3 00	641.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	0 70	\$95.00	\$66.50
J. Jeffrey Coughlin	2.30	250.00	575.00

Alfie Ware

Coyote Springs

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Statement No: 3533

Total Current Work

641 50

Balance Due

\$4,426.90

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
Prescott, Arizona 86303
Phone number (928) 445-7137
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Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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03/02/2011
Account No: 90940-05M
Statement No: 3619

Previous Balance \$4,426.90

Fees

		Hours	
02/02/2011 JC	Reviewed Judge Mackey's ruling on request for permission to serve remaining owners by publication, compared with motion and notes from discussions with owners and gave instructions to paralegal to compare owners identified by Judge Mackey that had not been served and those parcels which did not have a record of ownership so we can discuss with Kelly Gregorio at Clerk's office to reconcile our records with theirs	1.80	450.00
02/03/2011 JC	Conference with paralegal Anna J. Nelson and paralegal Christi Padilla re: reconciling differences between Court records of owners served and our records to comply with Court's ruling of 2/1/11 finding that plaintiffs had taken substantial steps to join owners, examined our data to prepare documents to present to Clerk for explanation (1.3) telephone call to Alfie W. re: Judge Mackey's decision on substantial steps to join issue (.2) letter to all clients enclosing copy of Judge Mackey's ruling re: substantial steps taken (.2)	1.70	425.00
CP	Review of Judge Mackey's February 1, 2011 Ruling, conference with J. Jeffrey Coughlin and Paralegal Anna J. Nelson to discuss action to be taken, compare list of owners not served on Ruling to our list of owners not served, research discrepancies in both lists, preparation of memorandum to Court Clerk Kelly Gregorio re: same	2.80	266.00
AJ	Conference with J Jeffrey Coughlin and Paralegal Christi Padilla regarding January 26, 2011 Ruling; review of file for No Owner		

Alfie Ware

Coyote Springs

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Account No:
Statement No:

		Hours	
	Record	1.10	104.50
CP	Draft letter to clients transmitting 2/1/2011 Ruling, preparation of same for mailing	0.30	28.50
02/04/2011			
AJ	Conference with J. Jeffrey Coughlin re: explanation for No owners of record; preparation of explanation for clerk	2.50	237.50
JC	Reviewed No Record of Owner list from clerk's office and worked with Paralegal Anna J. Nelson to determine parcel history	1.40	350.00
02/07/2011			
JC	Reviewed paralegal Anna J. Nelson's information re: "no record of owners" identified by court and compared with flow chart for accuracy and to discuss with Kelly Gregorio as directed by court (1.3) Conference with paralegal Anna J. Nelson and paralegal Christi Padilla to discuss all information needed to meet with Kelly G. (.3)	1.60	400.00
AJ	Complete explanation to Clerk re: No owners of record; Conference with J. Jeffrey Coughlin re: same	3.00	285.00
CP	Conference with J. Jeffrey Coughlin re: meeting with court clerk, documents necessary to discuss status, draft Plaintiff's Notice of Filing Second Revision of Property Owners List, revision of Owners List spreadsheet to show service status of all owners, revision of memo to Kelly Gregorio re. status of service	2.40	228.00
02/08/2011			
JC	Conference with paralegal Christi Padilla re: documents to present to Kelly Gregorio tomorrow and how to present them	0.20	50.00
CP	Conference with J. Jeffrey Coughlin re: documents to provide to court clerk Kelly Gregorio at 2/9/2011 meeting, final revisions to memo re: status of service, prepare all documents to take to meeting	1.20	114.00
02/09/2011			
JC	Conference with paralegal Christi Padilla , reviewed pleadings, rulings, property owner information to prepare for meeting with Court Clerk Kelly Gregario (.8) Conference with Kelly Gregario according to court order to review service documents and attempt to reconcile differences between Court Documents and our records (.9)	1.70	425.00
CP	Preparation for meeting with court clerk Kelly Gregorio, conference with J. Jeffrey Coughlin re: same, conference with Kelly Gregorio and J. Jeffrey Coughlin re: status of service of all owners, status of parcels with no owner, split parcels and new owners, revision of Owners List, revision of Notice of Filing Revised Owners List,	2.80	266.00

Alfie Ware

Coyote Springs

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03/02/2011
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Account No:
Statement No:

		Hours	
	CP Summarize all new pleadings, update index re: same	0.60	57.00
02/10/2011	CP Final revisions to new Owners List, preparation of Notice of Filing for filing with Court, copy Owners List onto CD for use by court clerk Kelly Gregorio	0.80	76.00
02/14/2011	CP Telephone conference with John Cundiff re: meeting with J. Jeffrey Coughlin, telephone message to Becki Nash re: same	0.20	19.00
02/15/2011	JC Reviewed packages and letters to be sent to five remaining new and unserved owners to determine accuracy and completeness and Conference with paralegal Christi Padilla about who to post notice, who has received mail out of state and who remains to serve by publication	0.40	100.00
	CP E-mail to Becki Nash re: meeting with J. Jeffrey Coughlin, e-mail to all other clients scheduling meeting and requesting they confirm, preparation of service packets for 5 additional property owners, conference with J. Jeffrey Coughlin re: additional service packets and meeting with clients	1.80	171.00
02/16/2011	CP File management, summarize all new pleadings and update index re: same, preparation of file for J. Jeffrey Coughlin use at client meeting on 2/17	1.20	114.00
02/17/2011	JC Reviewed Court Rulings re: joining property owners from post - court of appeals activity to present, gathered legal reasearch helpful to our case and prepared notes for suggestions to discuss in meeting with Ken nd Katheryn Page, John and Barbara Cundiff and Becky Nash (1.2) met with clients to discuss Judge Mackey's Feb. 1, 2011 Ruling determining that we had taken substantial steps to join necessary and indispensable parties and strategy for continuing (1.5) e-mail from Noel Hebet on behalf of Grace moving to amend answer and reviewed proposed amended answer to determine if objection warranted (.6)	3.30	825.00
02/18/2011	JC Reviewed return mail from McNabb and Moore, compared with list of unserved owners and Judge Mackey's ruling and gave instructions to paralegal to try to locate, located on Robert Road and resent Acceptance of Service letter (.4) reviewed Motion to		

Alfie Ware

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Account No:
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Coyote Springs

		Hours	
	Amend answer filed by counsel William Grace, researched the cases cited and compared with Answer filed by Adams when he represented Grace and reviewed proposed Amended Answer to determine if objection necessary (1.8)	2.20	550.00
AJ	Locate new address for Geoffrey McNabb; revise letter and mail same	0.50	47 50
02/24/2011			
AJ	Phone conference with Kelly at Clerk's office re: questions regarding discrepancies; review of file for same; Conference with J. Jeffrey Coughlin re: same; preparation of new packet to Jeffrey Donaldson	2.00	190.00
JC	Conference with paralegal Anna J. Nelson re: discussion she had with Kelly Gregorio at clerk's office re: remaining issues for service, compared recorder's office information with assessor's office information and solved two of the three issues (1.2) searched data bases for owner of parcels 103-01-058F and G, compared with recorder's and assessor's, located Jeffrey Donaldson and telephone call to Donaldson to get explanation for why Richard Davis signed an acceptance and he did not, asked me to send another and resent (.6)	1.80	450.00
02/28/2011			
CP	Conference with AJ Nelson re: her conversation with Kelly Gregario re: changes to property owners spreadsheet; revision of property owners spreadsheet re: same	0.40	38.00
	For Current Services Rendered	<u>39.70</u>	<u>6,267.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
AJ Nelson	9.10	\$95.00	\$864.50
Christi Padilla	14.50	95.00	1,377.50
J. Jeffrey Coughlin	16.10	250.00	4,025.00

Total Current Work 6,267.00

Payments

02/15/2011	Payment	-4,426.90
	Balance Due	<u>\$6,267 00</u>

Alfie Ware

Coyote Springs

Account No:
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3619

This statement includes all payments received through the last day of the previous billing month.

J. JEFFREY COUGHLIN PLLC
 114 S. Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-7137
 Taxpayer I.D.# 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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 04/01/2011
 90940-05M
 3792

Account No:
 Statement No:

Previous Balance \$6,267.00

Fees

		Hours	
03/02/2011			
CP	Conference with J. Jeffrey Coughlin re: remaining owners to be served, revision of owners list and telephone message to Kelly at Court Clerk's office re: same	0.80	76.00
JC	Conference with paralegal Anna J. Nelson and paralegal Christi Padilla re: which property owners we will be allowed to serve by publication and which ones we need to post at door or gate, compared with court order and gave instructions to paralegals to contact Kelly Gregorio to finalize list	0.60	150.00
CP	Telephone conference with Court Clerk Kelly Gregorio re: owners to be served, e-mail updated list to Kelly for her review and comment	0.40	38.00
03/03/2011			
JC	Reviewed Notice of Reconciliation for accuracy, viewed county records to determine why parcel # 103-01-068 exists but does not have an owner of record and gave instructions to paralegal to notify Kelly Gregorio that 068 does not exist, but 068E does (.7) reviewed February 1, 2011 ruling to ensure the proper notice is given to Palmer for posting on doors and gates along with publication as required by Arizona Rules of Civil Procedure 4.1(n),(m), 4.2(f) and as authorized by the court (.6)	1.30	325.00
AJ	Preparation of packet for service pursuant to Order	0.50	47.50
CP	Preparation of additional service packets for mailing and for Palmer Investigative Services, telephone conference with Chris at Palmer Investigative Services re: same, preparation of individual letters to all remaining property owners to be served, preparation		

Alfie Ware

Coyote Springs

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04/01/2011
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3792

Account No:
Statement No:

		Hours	
	of packets for mailing	4.40	418.00
03/04/2011			
AJ	Print label and duplicate all letter s to be sent out to 17 property owners pursuant to last order	0.80	76.00
03/07/2011			
JC	Conference with paralegal Anna J. Nelson and paralegal Christi Padilla re: remaining owners to be identified to Court, reviewed Plaintiff's Notice of Filing Third Revision of Property Owners list and revised Notice of Reconciliation for accuracy and gave instructions to paralegal to file both (.4) telephone call from Margorie Gilstrap re: summons and notice she received in mail and discussed questions she had (.4)	0.80	200.00
CP	Conference with Paralegal Anna J. Nelson and J. Jeffrey Coughlin re: reply from court clerk Kelly Gregorio about new owner and removal of property with no owner, revision of property owner list re: same, revision of Notice of Reconciliation re: same, draft Notice of Filing 3rd Revision of Property Owners List, preparation of documents for filing with the court and for mailing	2.40	228.00
03/08/2011			
CP	Conference with J. Jeffrey Coughlin re: service of remaining and out of state property owners by publication, letter to Camp Verde Journal re: same	0.40	38.00
03/09/2011			
CP	Telephone conference with Jeff Donaldson re: Acceptance of Service, conference with J. Jeffrey Coughlin re: same	0.20	19.00
CP	Telephone conferences with Prescott Daily Courier and Camp Verde Journal re: publication of Summons, letter to Camp Verde Journal requesting publication for four consecutive weeks	0.60	57 00
03/10/2011			
CP	Review of Certificates of Service from Palmer Investigative Services re: alternative service on remaining property owners, compare to list given to Palmers to identify owners left to serve	0.70	66.50
03/11/2011			
AJ	Phone conference with Palmers re: last posting; Conference with J. Jeffrey Coughlin re: next step; Phone conference with Paralegal Christi Padilla re: same	0.30	28.50
03/15/2011			
JC	Reviewed service records and returned call from Leon Cardini to		

Alfie Ware

Coyote Springs

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Hours

	discuss reason for him receiving documents (.4) Reviewed and revised Affidavit of Mailing and gave instructions to paralegal to file before we receive results of publication (.2) reviewed supplemental filing of owners to whom the final service documents have been mailed as well as posted and gave instructions to paralegal to modify for completeness (.3)	0.90	225.00
CP	Draft Affidavit of Mailing re: alternative service, conference with J. Jeffrey Coughlin re: same	0.50	47.50
03/28/2011			
CP	Summarize and index all new pleadings, calendar deadlines	0.70	66.50
CP	Telephone conference with Camp Verde Journal to confirm publication of summons	0.20	19.00
03/31/2011			
JC	Telephone call from Bonnie Rossen re: Answer she received from Mark Drutz and discussed the answer which Jeff Adams filed on her behalf without her authority and reviewed file to determine when Adams filed answer and when he first tried to withdraw	1.60	400.00
	For Current Services Rendered	18.10	2,525.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
AJ Nelson	1.60	\$95.00	\$152.00
Christi Padilla	11.30	95.00	1,073.50
J. Jeffrey Coughlin	5.20	250.00	1,300.00

Expenses

03/03/2011	Photocopy charges	11.25
03/04/2011	Postage	23.63
03/09/2011	Postage - mailing to property owners pursuant to February 1, 2011 Ruling	34.75
	Total Expenses	69.63

Advances

03/09/2011	Publication of service	100.00
03/18/2011	Processor fee	140.00
03/18/2011	Processor fee	708.00
	Total Advances	948.00

Alfie Ware

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	Total Current Work		3,543.13
		<u>Payments</u>	
03/28/2011	Payment		-6,267.00
	Balance Due		<u>\$3,543.13</u>

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J JEFFREY COUGHLIN PLLC

114 S. Pleasant Street
Prescott, Arizona 86303
Phone number (928) 445-7137
Taxpayer I.D.# 26-4381817

Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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05/04/2011
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Statement No: 4129

Previous Balance \$3,543.13

Fees

		Hours	
04/07/2011			
CP	Review of Affidavit of Publication, draft Proof of Service by Publication	0.70	66.50
JC	Reviewed Camp Verde Journal affidavit of publication, Ruling by Judge Mackey and gave instructions to paralegal to prepare notice for filing with court (.2) reviewed notes from discussion with Bonnie Rossen and gave instructions to paralegal to prepare affidavit (.2)	0.40	100.00
04/12/2011			
JC	Reviewed Proof of Publication for filing with court and gave instructions to paralegal to see if Order of withdrawal has been signed re: Adams' former clients (.3) reviewed Varilek's Request for Judicial Reassignment, legal research re: which court hears a motion for consolidation and prepared objection to Request (1.3)	1.60	400.00
CP	Draft Objection to Motion for Judicial Reassignment	0.30	28.50
04/13/2011			
JC	Reviewed Wilhelmson's previous attempts to remove Judge Mackey from case and finalized Objection to Request for Judicial Re-assignment	1.10	275.00
04/18/2011			
JC	Telephone call from Alfie re: e-mail from John Cundiff wanting to know next step in litigation (.2) Conference with paralegal Christi Padilla re: filing Notice of compliance with court's order, Reviewed and revised draft of Notice and compared with previous orders of the court and gave instructions to paralegal to finalize and file (.5)		

Alfie Ware

Coyote Springs

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		Hours	
	reviewed Special Appearance of Robert Taylor and Teri Thompson -Taylor and compared with property list (.2)	0.90	225.00
CP	Conference with J. Jeffrey Coughlin re: status of service of property owners, draft Notice of Compliance with Court's order re: service of property owners, conference with J. Jeffrey Coughlin re: same	1.50	142.50
04/27/2011			
JC	Reviewed Veres' Joinder in Objecting to Judicial Reassignment and compared with our Objection	0.30	75.00
	For Current Services Rendered	6.80	1,312.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	2.50	\$95.00	\$237.50
J. Jeffrey Coughlin	4.30	250.00	1,075.00

Advances

04/07/2011	Publication	204.42
	Total Advances	204.42
	Total Current Work	1,516.92

Payments

04/12/2011	Payment	-3,543.13
	Balance Due	<u>\$1,516.92</u>

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Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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Account No:
Statement No:

Previous Balance \$1,516.92

Fees

		Hours	
05/09/2011			
CP	Summarize all pleadings, update index of same, revise Caption re: Robert Schmitt representation of Taylor & Thomson-Taylor	0.90	85.50
05/16/2011			
CP	Investigate property for sale by Mark M Miller, locate Deed on Yavapai County Recorder's website, compare legal description with map of Coyote Springs Subdivision, conference with J. Jeffrey Coughlin re: same	1.20	114.00
JC	Reviewed fax from Ce Ce re: Coyote Springs owner trying to split lot, gave instructions to paralegal to research what phase property located in, Conference with paralegal Christi Padilla re: her findings and how to locate Covenants, Conditions and Restrictions for phase two (.6) Conference with Alfie and Ce Ce re: how to proceed against seller of property (.2)	0.80	200.00
05/17/2011			
CP	Research each Coyote Springs business identified in Defendants' Seventh Supplemental Disclosure Statement, print back up documentation for each business, create for same, conference with J. Jeffrey Coughlin re: same	2.50	237.50
05/23/2011			
JC	Telephone conference with Alfie re: letter to property owner in Phase 2 who is splitting lot	0.10	25.00

Alfie Ware

Coyote Springs

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		Hours	
05/25/2011	JC	Reviewed additional comments in Courier on Coyote Springs	0.30 75.00
05/26/2011	CP	Conference with J. Jeffrey Coughlin re: Mark Miller's MLS listing for sale of property in Coyote Springs, research Donald Plunkett at Congress Realty, draft letter to Mark Miller and Donald Plunkett re: split of lot will be in violation of CC&Rs and may subject owner to lawsuit	0.60 57.00
	CP	Research Yavapai County Recorder's Website re: CC&Rs for Coyote Springs Ranch, Phase II, telephone conference with Yavapai County Recorder's office re: same	0.60 57.00
	JC	Searched for Covenants, Conditions and Restrictions which apply to Coyote Springs Phase II (.4) verified that Miller's parcel is included in Phase II (.3) reviewed and revised letter to Mark Miller re: violation of Covenants, Conditions and Restrictions (.3)	1.00 250.00
	CP	Travel to Yavapai County Recorder's office to view recorded CC&Rs of Coyote Springs Ranch Phase II, obtain copy of same, conference with J. Jeffrey Coughlin re: same	0.40 38.00
05/31/2011	CP	Create file re: Phase II CC&Rs, Mark Miller sale documents	0.20 19.00
		For Current Services Rendered	8.60 1,158.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	6.40	\$95.00	\$608.00
J. Jeffrey Coughlin	2.20	250.00	550.00

Expenses

05/26/2011	Photocopy charges - Copy of Coyote Springs CC&Rs from Yavapai County Recorder	3.00
	Total Expenses	3.00
	Total Current Work	1,161.00

Payments

05/26/2011	Payment	-1,516.92
	Balance Due	<u>\$1,161.00</u>

Alfie Ware

Coyote Springs

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Account No:
Statement No:

This statement includes all payments received through the last day of the previous billing month.

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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 07/01/2011
 Account No: 90940-05M
 Statement No: 4445

Previous Balance \$1,161.00

Fees

		Hours	
06/06/2011			
CP	Begin draft of Plaintiffs' Motion for Summary Judgment and Statement of Facts in Support of Motion for Summary Judgment for J. Jeffrey Coughlin review and revision	2.40	228.00
06/20/2011			
JC	Telephone call from Jeff Adams re: whether service issues are completed, whether there is a list of owners aligned with plaintiffs and discussed depositions, reviewed Noel Hebet email re: service issues and compared with our records re: service	0.60	150.00
	For Current Services Rendered	3.00	378.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	2.40	\$95.00	\$228.00
J. Jeffrey Coughlin	0.60	250.00	150.00

Total Current Work 378.00

Payments

06/30/2011 Payment -1,161.00

Balance Due \$378.00

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

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 08/01/2011
 Account No: 90940-05M
 Statement No: 4484

Attn: Alfie Ware

Coyote Springs

Previous Balance \$378.00

Fees

		Hours	
07/01/2011	JC		
	Reviewed Seventh Supplemental Disclosure Statement and searched County Assessor's Parcel Numbers for business owners as indicated by paralegal Christi Padilla	1.40	350.00
07/05/2011	JC		
	Reviewed Court ruling reassigning case to Judge Jones based on Varilek's Notice, Order permitting filing of amended answer by William Grace, Order of Withdrawal of Adams as attorney for Tapps and Strissels, Order of Withdrawal of Adams as attorney for Feddemas, Martinez, Navarro, Stegeman Trust, Cong, Nguyen, Sels, Hoffmans, Heckethorns, Murphys, Richies, Folsom, Paloutzian, Rosson, Stack Trust and Audsleys and Order Allowing Withdrawal of Parties Cong and Nguyen from Action	0.20	50.00
07/06/2011	CP		
	Review of July 5, 2011 ruling and orders re: withdrawal of Jeff Adams for several property owners, update mailing certificate to include all owners previously represented by Jeff Adams, summarize all new pleadings and update pleadings index	1.50	142.50
	For Current Services Rendered	3.10	542.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	1.50	\$95.00	\$142.50
J. Jeffrey Coughlin	1.60	250.00	400.00

Alfie Ware

Coyote Springs

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08/01/2011

Account No:

90940-05M

Statement No:

4484

Total Current Work

542.50

Balance Due

\$920.50

This statement includes all payments received through the last day of the previous billing month.

J. JEFFREY COUGHLIN PLLC
 114 S. Pleasant Street
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Alfie Ware
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Attn: Alfie Ware

Coyote Springs

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 09/01/2011
 Account No: 90940-05M
 Statement No: 4555

Previous Balance \$920 50

Fees

		Hours	
08/25/2011	JC		
	Reviewed Motion to Set for Trial, legal research re: basis for controverting certificate and gave instructions to paralegal to prepare Controverting Certificate	0.30	75.00
	CP		
	Conference with J. Jeffrey Coughlin re: Defendants' Motion to Set and Certificate of Readiness, draft Controverting Motion to Set and Certificate of Readiness	0.20	19.00
08/26/2011	JC		
	Legal research re: grounds for controverting Motion to Set, reviewed and revised controverting certificate to Motion to Set	0.40	100.00
	For Current Services Rendered	<u>0.90</u>	<u>194.00</u>

Recapitulation

Timekeeper	Hours	Rate	Total
Christi Padilla	0.20	\$95.00	\$19.00
J. Jeffrey Coughlin	0.70	250.00	175.00

Total Current Work 194.00

Payments

08/04/2011 Payment -378.00

Balance Due \$736.50

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Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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10/12/2011
Account No: 90940-05M
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	Previous Balance		\$736.50
		<u>Payments</u>	
10/05/2011	Payment		-194.00
	Balance Due		<u>\$542.50</u>

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Prescott Valley AZ 86314

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Coyote Springs

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11/08/2011
Account No: 90940-05M
Statement No: 4674

Previous Balance	\$542.50
Balance Due	<u>\$542.50</u>

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Coyote Springs

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 12/01/2011

Account No: 90940-05M
 Statement No: 4708

Previous Balance \$542.50

Fees

		Hours	
11/03/2011			
CP	Summarize and update index for pleadings (.3); preparation of file for J. Jeffrey Coughlin use at 11/7/2011 hearing (.3)	0.60	57.00
11/07/2011			
JC	Reviewed Motion to Set, Controverting Certificate, Order Setting Status Conference and all filings from Judge Mackey's denial of class action forward to prepare for status conference (1.6) legal research re: present appellate court position on elements necessary to establish complete abandonment (1.4) attended status conference before Judge Jones (1.1)	4.10	1,025.00
	For Current Services Rendered	4.70	1,082.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	0.60	\$95.00	\$57.00
J. Jeffrey Coughlin	4.10	250 00	1,025.00

Total Current Work 1,082.00

Payments

11/22/2011 Payment -542.50

Balance Due \$1,082.00

Alfie Ware

Coyote Springs

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Statement No: 4708

This statement includes all payments received through the last day of the previous billing month.

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Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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Account No:
Statement No:

Previous Balance \$1,082.00

Fees

		Hours	
12/01/2011			
CP	Conference with J. Jeffrey Coughlin re: trial deadlines, trial preparation, etc (.6); review of file to locate all photographs of Coyote Springs parcels (.8); compare all names listed on Answers filed by Jeff Adams to Property Owners List to identify parties to the litigation who are not Phase I property owners (1.2); telephone conference with Kathleen at Judge Jones office re: scheduling conference memo, conference with J. Jeffrey Coughlin re: same (.2); preparation of Rule 16(b) proposed scheduling conference memo (.6)	3.40	323.00
12/02/2011			
JC	Reviewed and revised Scheduling Order to circulate among parties as ordered by the Court (.7) voice mail from Alfie Ware and telephone call to Alfie Ware re: videotaping Coyote Springs and Monday's scheduling conference (.3)	1.00	250.00
12/05/2011			
JC	Voice mail to and voice mail from Jeff Robertson at Big Picture Video re: video of Coyote Springs (1) reviewed property list, caption changes, list of parties who are listed as clients of Adams but who do not reside in Phase One, reviewed all previous rulings by Judge Mackey and decision of Court of Appeals in preparation for today's scheduling conference (1.4) attended scheduling conference before Judge Jones and conference with Hans Clugston re. his client's position and expected outcome of case if his client sells or abandons property (1.6)	3.10	775.00

Alfie Ware

Coyote Springs

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Account No:
Statement No:

		Hours	
12/06/2011	JC Telephone call from Jeff Robertson re: videography of Coyote Springs (4) email from Jeff Robertson with Google Earth imagery (.2)	0.60	150.00
12/09/2011	JC Compared google earth views with County map of Coyote Springs and began tracing perimeter for instructions to Jeff Robertson	0.60	150.00
12/20/2011	JC Message from Alfie Ware re: article in Courier and email from John Cundiff re: Courier article, telephone call to Alfie Ware re: same, reviewed article and gave instructions to paralegal to research CC&R restrictions on animals and county regulations re: same (.4)	0.40	100.00
	For Current Services Rendered	9.10	1,748.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	3.40	\$95.00	\$323.00
J. Jeffrey Coughlin	5.70	250.00	1,425.00

Total Current Work 1,748.00

Payments

01/04/2012	Payment	-1,082.00
	Balance Due	<u>\$1,748.00</u>

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Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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Account No: 90940-05M
Statement No: 4761

	Previous Balance		\$1,748.00
		<u>Payments</u>	
01/25/2012	Payment		-1,748.00
	Balance Due		<u>\$0.00</u>

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Coyote Springs

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04/03/2012
Account No: 90940-05M
Statement No: 4842

Fees

		Hours		
		Hours	Rate	Total
03/14/2012	JC			
	Viewed Coyote Springs on Google Earth to see if possible to detect physical condition of the property	0.30		<u>75.00</u>
	For Current Services Rendered	0.30		<u>75.00</u>
		Recapitulation		
Timekeeper		Hours	Rate	Total
J. Jeffrey Coughlin		0 30	\$250.00	\$75.00
Total Current Work				75.00
Balance Due				<u>\$75.00</u>

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Coyote Springs

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Account No: 90940-05M
Statement No: 4874

		<u>Fees</u>	
		Hours	
	Previous Balance		\$75.00
04/10/2012	JC	Conference with Kenneth and Kathryn Page re: status of suit	0.30 75.00
04/16/2012	JC	Message from Alfie Ware re: Courier article about Diamond Valley business, reviewed article and telephone call to Alfie Ware to discuss	0.20 50.00
04/17/2012	JC	Reviewed Coyote Springs businesses as identified by Defendant's Seventh Supplemental Disclosure Statement and conference with paralegal Christi Padilla re: updating list and requesting Palmers update the list	0.70 175.00
04/20/2012	JC	Reviewed order re: setting of status conference and reviewed file to determine what can be accomplished before May 29	0.40 100.00
04/26/2012	JC	Multiple telephone conferences with Kathryn Wilde (daughter of Margaret Kozlowski) re: whether she is a party in suit, reviewed file, conference with paralegal Christi Padilla re: master list, reviewed Yavapai County Assessor's Office and Yavapai County Recorder's Office to determine whether we must amend service list for court	0.70 175.00
For Current Services Rendered		2.30	575.00

Alfie Ware

Coyote Springs

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Statement No: 4874

		Recapitulation		
	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
	J. Jeffrey Coughlin	2.30	\$250.00	\$575.00
	Total Current Work			575.00
		<u>Payments</u>		
04/09/2012	Payment			-75.00
	Balance Due			<u>\$575.00</u>

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Coyote Springs

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 06/01/2012
 Account No: 90940-05M
 Statement No: 4910

Previous Balance \$575.00

Fees

		Hours	
05/29/2012			
CP	Conference with J. Jeffrey Coughlin re: status conference (.1); preparation of file for J. Jeffrey Coughlin use at status conference, summarize new pleadings and update pleadings index (.5)	0.60	57.00
JC	Reviewed pleadings, discovery, disclosures and proposed scheduling orders to prepare for status conference (.7) attended status conference (1.4) gave instructions to paralegal to modify Rule 16 scheduling order to file tomorrow, reviewed modified version and authorized filing (.6)	2.70	675.00
05/30/2012			
CP	Revise and finalize Plaintiffs' Proposed Schedule for Rule 16(b) Scheduling Conference, preparation for mailing and filing	0.70	66.50
	For Current Services Rendered	4.00	798.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	1.30	\$95.00	\$123.50
J. Jeffrey Coughlin	2.70	250.00	675.00

Expenses

05/30/2012	Photocopy charges - Plaintiffs' proposed Schedule for Rule 16(b) Scheduling Conference	27.30
05/30/2012	Postage - Postage for mailing Plaintiffs' Proposed Schedule for Rule 16(b) Scheduling Conference	10.80

Alfie Ware

Coyote Springs

Account No:
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Total Expenses	<u>38.10</u>
Total Current Work	836.60
Balance Due	<u>\$1,411.60</u>

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Coyote Springs

Page: 1
07/02/2012
Account No: 90940-05M
Statement No: 4975

Previous Balance \$1,411.60

Fees

		Hours	
06/04/2012	JC		
	Reviewed Defendant's Cox Pre-trial Conference Memorandum for scheduling and compared with deadlines set forth in plaintiff's Pre-trial Conference Memorandum and notes from last status conference	0.30	75.00
06/05/2012	CP		
	Conference with J. Jeffrey Coughlin re: identifying Jeff Adams' clients (.3); review all Answers filed by Jeff Adams and all Motions to Withdraw to identify which clients he currently represents (.5); create list of the following: Clients Jeff Adams answered for, Clients Jeff Adams withdrew, property owners represented by Adams who are not Phase I owners, clients Jeff Adams currently represents (1.0)	1.80	171.00
	JC		
	Reviewed Motion from Varilek re: dismissal of Kozlowski, compared mailing list with ours and gave instructions to paralegal to verify accurate list for mailing	0.30	75.00
06/08/2012	JC		
	Reviewed Defendant's 9th Supplemental Disclosure Statement re: Prescott Soaring Society, viewed location on google earth, Defendant's Motion for Site Inspection and telephone call to Alfie Ware re: alerting plaintiff oriented parties to watch for any changes	0.60	150.00
06/11/2012	JC		
	Telephone call from Alfie Ware re. video tapes he took of Coyote Springs properties and began review of same (.4) reviewed		

Alfie Ware

Coyote Springs

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Account No:
Statement No:

		Hours	
	defendant Veres joinder in Cox disclosure statements and response to Plaintiff's and defendant's Pretrial Conference Memoranda and compared with ours (.3)	0.70	175.00
06/19/2012	JC Reviewed Varilek's Response to Plaintiff's Proposed Schedule and compared with ours (.2) continued reviewing video of Coyote Springs (.9)	1.10	275.00
06/25/2012	JC Attempted to view 3 new dvds which Cundiffs recorded over the weekend, nothing recorded, attempted to retrieve recording by other means, unable to do so and telephone call to Alfie Ware to advise of same (.4) legal research re: complete abandonment and non-waiver clauses to prepare Motion for Summary Judgment (1.4)	1.80	450.00
06/27/2012	JC Viewed partial video recording taken by Alfie Ware yesterday of Coyote Springs subdivision and attempted to download and copy on cd (.6) reviewed affidavit of Robert Conlin re: what court of appeals referred to in decision and considered how it corresponded with language in College Book Centers case (.8)	1.40	350.00
	For Current Services Rendered	8.00	1,721.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	1.80	\$95.00	\$171.00
J. Jeffrey Coughlin	6.20	250.00	1,550.00

Total Current Work 1,721.00

Payments

06/13/2012	Payment	-1,411.60
	Balance Due	\$1,721.00

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-4400
 Taxpayer I.D.# 26-4381817

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Account No:
 Statement No:

Attn: Alfie Ware

Coyote Springs

Previous Balance \$1,721.00

Fees

		Hours	
07/09/2012			
JC	Voice mail from David Fickes re. dvds completed and telephone call to David to discuss status, picked up finished product and discussed with David re. longevity of dvds	0.60	150 00
07/13/2012			
JC	Reviewed Adams' reply re. site inspection, compared with Varilek's objection and original motion	0.20	50 00
07/19/2012			
JC	Telephone call from Jeff Adams re whether I plan to take any depositions	0 10	25 00
07/23/2012			
JC	Message from Bob Janis re reason for being included in suit and returned call to explain	0.40	100.00
07/24/2012			
JC	Reviewed defendant's 9th Supplemental Disclosure Statement with description of Prescott's Soaring society's activities and origins and compared with Arizona Corporation Commission records	0.30	75 00
	For Current Services Rendered	1.60	400 00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
J. Jeffrey Coughlin	1 60	\$250.00	\$400.00

Advances

07/06/2012	Transfer of media from camera to DVD		67 59
	Total Advances		67 59

Alfie Ware

Coyote Springs

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Account No:

Statement No:

Total Current Work

467.59

Balance Due

\$2,188.59

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114 S. Pleasant Street
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 Phone number (928) 445-4400
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 Statement No: 5023

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

Previous Balance \$2,188.59

Fees

		Hours	
08/21/2012			
CP	Conference with J. Jeffrey Coughlin re: Defendants' Cox List of Witnesses and Defendant Veres' Joinder (.2); review of Rule 26.1 re: disclosure of witnesses (.3); draft Objection to List of Witnesses and Joinder (.4)	0.90	85.50
JC	Reviewed Defendant's Cox Notice of Filing Defendant' Witness List and Defendant Veres Joinder in Notice, compared with previous disclosures, witness listst and Scheduling Order and prepared objection	1.70	425.00
	For Current Services Rendered	2.60	510.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	0.90	\$95.00	\$85.50
J. Jeffrey Coughlin	1.70	250.00	425.00

Expenses

08/13/2012	Postage - Mailing of Notice of Change of Address to all addresses on mailing certificate	11.25
	Total Expenses	11.25
	Total Current Work	521.75

Payments

08/10/2012	Payment	-2,188.59
	Balance Due	<u>\$521.75</u>

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Phone number (928) 445-4400
Taxpayer I D.# 26-4381817

Alfie Ware
7655 East Florentine Road
Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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	Previous Balance		\$521.75
		<u>Payments</u>	
09/19/2012	Payment		-521.75
	Balance Due		<u>\$0.00</u>

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114 S. Pleasant Street
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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

Fees

		Hours	
10/22/2012			
JC	Reviewed Notice of Deposition re: Lonesome Valley Newspaper Corp for records, subpoena duces tecum re: same and defendant's 12th supplemental Disclosure Statement re: same (.3)	0.30	75.00
CP	Telephone conferences with John Cundiff inquiring about the whereabouts of Robert D. Conlin (.2); telephone conference with Alfie Ware re: same (.1); research Yavapai County Assessor's website re: tax bills for property Robert Conlin may own and possible addresses (.4); draft letter to Robert D. Conlin re: meeting with J. Jeffrey Coughlin (.2)	0.90	85.50
10/23/2012			
JC	Reviewed pleadings, correspondence, affidavit of Robert Conlin and located contact for Conlin family and voice mail to Glen Arm Land Co (.7)	0.70	175.00
CP	Conference with J. Jeffrey Coughlin re: results of search for Robert D. Conlin (.2); research file re: previous disclosure and correspondence from Favour, Moore & Wilhelmsen, discuss same with J. Jeffrey Coughlin (.6)	0.80	76.00
10/25/2012			
JC	Viewed all dvds re: Coyote Springs as filmed by Alfie Ware and Barbara Cundiff, replayed as necessary to consider how to describe in Motion for Summary Judgment and in Disclosure Statement and compared filming of street signs to Yavapai County GIS mapping system for location of cross streets	3.60	900.00
	For Current Services Rendered	6.30	1,311.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	1.70	\$95.00	\$161.50
J. Jeffrey Coughlin	4.60	250.00	1,150.00

Total Current Work 1,311.50

Alfie Ware

Coyote Springs

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Balance Due

\$1,311.50

This statement includes all payments received through the last day of the previous billing month.

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-4400
 Taxpayer I.D # 26-4381817

Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Attn: Alfie Ware

Coyote Springs

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 Account No: 90940-05M
 Statement No: 5175

Fees

		Hours	
12/13/2012			
JC	Reviewed Adams Motion in Limini re. Robert Conlin testifying, Varilek's response, cases cited therein, appellate decision and considered whether to respond	1.40	350.00
12/18/2012			
JC	Began working on Motion for Summary Judgment	1.70	425.00
12/19/2012			
JC	Reviewed Court of Appeals decision, Disclosure Statements, legal research compiled to date and continued preparing Motion for Summary Judgment (4.3) reviewed Adams Motion in Limine re: Robert Conlin, cases cited therein, Varilek's response, Conlin's affidavit, located reference in Court of Appeals decision to Conlin and gave instructions to paralegal to prepare joinder for filing today (1.3)	5.60	1,400.00
12/20/2012			
JC	Continued preparing Motion for Summary Judgment	4.90	1,225.00
CP	Review of Barbara and John Cundiff's deposition transcripts, identify portions where they testify regarding keeping Coyote Springs "rural"	2.40	228.00
12/27/2012			
JC	Voice mail from Alfie Ware and voice mail to Alfie Ware re: status of Motion for Summary Judgment (1) continued working on Motion for Summary Judgment and Statement of Facts (5.2)	5.30	1,325.00
CP	Preparation of exhibits to Motion for Summary Judgment (8); revision of Motion for Summary Judgment and Statement of Facts for J. Jeffrey Coughlin review (.8), preparation of draft Affidavit of John Cundiff (.5)	2.10	199.50
12/28/2012			
JC	Completed Affidavit of John Cundiff, Statement of Facts in Support of Motion for Summary Judgment and Motion for Summary Judgment on all remaining claims (4.7) conference with John Cundiff re: contents of affidavit, revised all documents to be consistent and authorized paralegal Christi Padilla to file and mail copies (1.6) telephone call to Alfie Ware to advise of filing Motion for Summary Judgment and discussed chances of		

		Hours	
	success (.2)	6.50	1,625.00
CP	Complete preparation of Motion for Summary Judgment and Statement of Facts, final preparation of exhibits, mail packet to all parties	3.40	323.00
12/31/2012			
CP	Research Yavapai County Assessor's office website to confirm that all Coyote Springs Ranch parcels are 9 acres or larger	4.70	446.50
CP	Complete research of Yavapai County Assessor's website to determine parcel sizes for Coyote Springs Ranch, Phase I	2.70	256.50
	For Current Services Rendered	<u>40.70</u>	<u>7,803.50</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	15.30	\$95.00	\$1,453.50
J Jeffrey Coughlin	25.40	250.00	6,350.00

Expenses

12/19/2012	Postage - Mailing of Joinder in Defendants' Response to Motion in Limine re: Robert Conlin	10.80
12/27/2012	Payment to Staples for 5 copies each, of 3 DVDs to use as exhibit to Motion for Summary Judgment	149.85
12/27/2012	3 additional copies of DVDs for use as exhibits to Motion for Summary Judgment, envelopes for mailing and filing DVDs	43.06
12/28/2012	Postage - Motion for Summary Judgment packet to represented parties	13.50
12/28/2012	Postage - Motion for Summary Judgment packet to unrepresented parties	46.00
	Total Expenses	<u>263.21</u>
	Total Current Work	8,066.71
	Balance Due	<u><u>\$8,066.71</u></u>

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

114 S Pleasant Street
 Prescott, Arizona 86303
 Phone number (928) 445-4400
 Taxpayer I.D.# 26-4381817

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Account No:
 Statement No:

Attn: Alfie Ware

Coyote Springs

Previous Balance \$8,066 71

Fees

Hours

01/02/2013			
JC	Reviewed defendant's Disclosure Statements that assert violations of CC&Rs and gave instructions to paralegal to compare with Conlin affidavit	0.80	200.00
01/03/2013			
JC	Searched file for disclosures of business activities, compared with Adams most recent list, searched file and Yavapai County Recorder's Office for clean complete copy of Covenants, Conditions and Restrictions and gave instructions to paralegal to verify that Adams' list is accurate (2.4)	2.40	600.00
CP	Review of all parcels disclosed by Adams which he claims have violated CC&Rs (.5), create spreadsheet indicating parcel number, alleged violation, CC&R allegedly violated (2 9)	3.40	323.00
01/07/2013			
JC	Reviewed alleged violations re: parcels and records of lots which are smaller than 9 acres, searched Yavapai County Recorder's Office and Yavapai County Assessor's Office for records for some small parcels identified	0.80	200 00
01/09/2013			
JC	Reviewed Varilek's Joinder in Motion for Summary Judgment on issue of waiver and abandonment, compared with Motion for Summary Judgment (3) and researched burden of proof for claims raised (.7) searched Yavapai County Assessor's Office for any changes is size of Coyote Springs lots and compared with research paralegal Christi Padilla conducted re: same (1 3)	2.30	575.00
01/15/2013			
JC	Reviewed and revised Request to Appear Telephonically at Feb. 13 argument on Motion in Limin re: Conlin affidavit and Adams' Reply in Support of Motion in Limine and compared with motion and response from Wilhelmssen	0.50	125.00

		Hours	
01/23/2013	CP	Draft Joint Pretrial Statement (1.2); review of file re: exhibits listed in Disclosure Statements and conference with J. Jeffrey Coughlin re: same (.8)	2.00 190.00
01/28/2013	JC	Reviewed and revised Joint Pretrial Statement for distribution to all parties for input	4.60 1,150.00
01/29/2013	JC	Telephone call from Alfie Ware re. Motion to Strike from Adams and status of Motion for Summary Judgment (.2) completed Joint Pretrial Statement (2.7)	2.90 725.00
		For Current Services Rendered	<u>19.70</u> <u>4,088 00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla	5.40	\$95.00	\$513.00
J Jeffrey Coughlin	14.30	250.00	3,575.00

Total Current Work 4,088.00

Payments

01/16/2013	Payment	-8,066 71
	Balance Due	<u>\$4,088 00</u>

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114 S Pleasant Street
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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Account No:
 Statement No:

Attn: Alfie Ware

Coyote Springs

Previous Balance \$4,088 00

Fees

		Hours	
02/05/2013			
JC	Legal research re cases cited in Motion to Strike and in Limine and cases re impeachment evidence disclosure (1.1) prepared Objection to Motion to Strike and in Limine (2.1)	3.20	800.00
02/06/2013			
JC	Reviewed Coyote Springs property owners' list with Yavapai County Assessor's Office parcel identification re lot size to include in Reply to Response to Motion for Summary Judgment	0.70	175 00
02/25/2013			
JC	Telephone call from Mark Drutz re. withdrawing as counsel for Veres	0.20	50 00
	For Current Services Rendered	4.10	1,025.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
J. Jeffrey Coughlin	4.10	\$250.00	\$1,025.00

Total Current Work 1,025.00

Payments

02/25/2013 Payment -4,188 00

Balance Due \$925.00

LAW OFFICES OF J. JEFFREY COUGHLIN PLLC

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 Prescott, Arizona 86303
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 Taxpayer I D # 26-4381817

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

Account No
 Statement No

Attn Alfie Ware

Coyote Springs

Previous Balance \$925 00

Fees

Hours

03/04/2013			
CP	Identification of and preparation of exhibits to Plaintiffs' Reply in Support of Their Motion for Summary Judgment	2 40	228 00
JC	Reviewed Adams Response to Motion for Summary Judgment, compared with Motion for Summary Judgment, Motion to Strike and responses thereto, Varilek's consolidated reply and began drafting Reply in support of Motion for Summary Judgment	4 30	1,075 00
03/05/2013			
JC	Completed Reply in Support of Motion for Summary Judgment (4 5) letter from Mark Drutz re: willingness to stipulate that his client Veres will not actively participate in consolidated action pending final resolution of case, reviewed Veres v Varilek file and considered what position to take (6) reviewed Stipulation received from Wilhelmson on behalf of Varilek and Order re same (1)	5 20	1,300 00
CP	Preparation of Plaintiff's Joinder and Reply in Support of Motion for Summary Judgment for filing and mailing to all property owners	2.40	228.00
03/06/2013			
CP	Review and summarize all new pleadings, update pleadings index re. same	0.80	76 00
03/12/2013			
JC	Message from John Cundiff re ruling from court, reviewed Under Advisement Ruling re Conlin affidavit, order vacating trial and dismissal of Varilek matter, telephone call to John to discuss	0 80	200 00
03/13/2013			
CP	Review of Order from Court vacating trial and setting oral argument on Motion for Summary Judgment (2), review of order denying Motion in Limine (2), conference with J Jeffrey Coughlin re same (1)	0 50	47.50
03/21/2013			
JC	Telephone call from Alfie Ware re. Drutz withdrawing and advised re:		

Coyote Springs

Varilek v. Veres issue

Hours

0.10

25 00

For Current Services Rendered

16 50

3,179 50

Recapitulation

Timekeeper

Christi Padilla

J Jeffrey Coughlin

Hours

6.10

10 40

Rate

\$95.00

250 00

Total

\$579 50

2,600.00

Expenses

03/04/2013

Photocopy charges - Copies of Yavapai County Assessor's parcel information sheet for use as exhibits to Reply to Motion for Summary Judgment

236.74

03/06/2013

Postage - Mailing of Reply in Support of Motion for Summary Judgment to all property owners on court mailing certificate

61 76

Total Expenses

298 50

Total Current Work

3,478.00

Payments

03/27/2013

Payment

-925.00

Balance Due

\$3,478 00

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

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 Account No: 90940-05M
 Statement No: 5291

Attn: Alfie Ware

Coyote Springs

Previous Balance \$3,478.00

Fees

Hours

04/11/2013			
CP	Preparation of file for J. Jeffrey Coughlin use at 4/16/2013 oral argument (.8); summarize all new pleadings and update index re: same (8)	1.60	152.00
04/15/2013			
JC	Reviewed Plaintiff's Motion for Summary Judgment, Cox's Motion to Strike and Opposition to Motion for Summary Judgment, Veres Opposition, Varilek's Joinder, Plaintiff's Reply, Objection to Motion to Strike and court rulings to prepare for oral argument tomorrow	2.70	675.00
04/16/2013			
JC	Prepared outline for oral argument and post motion discussion as ordered by the court (1.8) attended oral argument before Judge Jones (3 8)	5.80	1,450.00
04/18/2013			
JC	Telephone call to Alfie Ware to advise of argument on Motion for Summary Judgment and upcoming Motion for Reconsideration	0.20	50.00
04/19/2013			
JC	Reviewed Cox's Motion for Reconsideration, Varilek's response, Judge Jones' initial ruling denying the Motion in Limine and began preparing objection	1.60	400.00
04/22/2013			
JC	Reviewed Adams' Motion for Reconsideration of ruling on Conlin affidavit, Varilek's Response, our Motion for Summary Judgment, Adams Motion to Strike and in limine, Judge Jones' ruling, Court of Appeals decision re: affidavit and prepared Joinder and Response	3.30	825.00
	For Current Services Rendered	15.20	3,552.00

Alfie Ware

Coyote Springs

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Account No:
Statement No:

<u>Timekeeper</u>	Recapitulation	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Christi Padilla		1.60	\$95.00	\$152.00
J. Jeffrey Coughlin		13.60	250.00	3,400.00
	Total Current Work			3,552.00
	Balance Due			<u>\$7,030.00</u>

This statement includes all payments received through the last day of the previous billing month.

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Alfie Ware
 7655 East Florentine Road
 Prescott Valley AZ 86314

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 06/03/2013
 Account No: 90940-05M
 Statement No: 5319

Attn: Alfie Ware

Coyote Springs

Previous Balance \$7,030 00

Fees

Hours

05/09/2013

JC

Reviewed the various rulings by Judge Mackey from the denial of the class action status to the joinder of all parties and the related motions and prepared response to Adams' Motion to Dismiss

3.10 775.00

For Current Services Rendered

3 10 775.00

Recapitulation

Timekeeper

J Jeffrey Coughlin

Hours

3.10

Rate

\$250.00

Total

\$775.00

Total Current Work

775.00

Payments

05/10/2013

Payment

-3,478.00

05/10/2013

Payment

-3,552.00

Total Payments

-7,030.00

Balance Due

\$775 00