



April 15, 2023

RaPower-3 Receivership  
Wayne Klein, Receiver  
Klein & Associates  
P.O. Box 1836  
Salt Lake City, UT 84110

Invoice: 924797  
Client: 176390  
Matter: 4

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Litigation**

Professional Services	\$ 85,016.00
Total Costs Advanced	<u>\$ 378.50</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 85,394.50</b>

## PARR BROWN GEE &amp; LOVELESS

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**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
1/02/23	JAB	Correspond with Wayne Klein re settlement; Review settlement agreement; Review and revise motion to approve settlement and proposed order; Revise trial outline in light of settlement; Review exhibits	1.80	522.00
1/03/23	JAB	Draft notice of settlement for Chris Taylor and Energizing Concepts; Conference with Tom Melton; Correspond with Wayne Klein; Review court order re social media contact; Review jury pool; Conference with Jasmine Leonardi re trial exhibits and trial; Review correspondence from court re case statement; Email Wayne Klein re same; Telephone conference with Steven Paul	5.70	1,653.00
1/03/23	TMM	Review jury questionnaires, prepare summary, prepare witness outline	6.20	3,069.00
1/03/23	JL	Conference with Jeffery Balls re trial exhibits; Review and edit trial exhibits; Email court re link for transfer of exhibits; Review witness list	2.60	390.00
1/04/23	JAB	Conference with Tom Melton and Wayne Klein; Conference with Jasmine Leonardi re exhibits; Review exhibit list and witness list; Review correspondence and correspond with Court; Email Rebekah-Anne Duncan re statement of the case; Attend status conference with Court re trial schedule; Telephone conference with Steven Paul re for cause challenges; Telephone conference with Wayne Klein; Email Steven Paul re settlement agreement; Revise jury instructions and verdict form; Draft testimony outline	8.20	2,378.00
1/04/23	TMM	Status conference; Review jury questionnaires, Conference re same; review social media information; Draft outline	7.50	3,712.50
1/04/23	JL	Conference with Thomas Melton, Jeffery Balls, Wayne Klein re juror questionnaires; Research social media of potential jurors; Prepare and finalize trial exhibits and index	7.50	1,125.00
1/05/23	JAB	Review jurors; Attend court hearing re jurors; Conference with Jasmine Leonardi; Prepare for trial; Revise jury instructions and verdict form; Review pretrial order; Telephone conference with Steven Paul; Review jurors	7.60	2,204.00
1/05/23	TMM	Draft opening; Pretrial conference re jury strikes	3.20	1,584.00
1/05/23	JL	Prepare for trial; Review juror research; Discussion with Jeffery Balls re same	2.50	375.00
1/06/23	JAB	Correspond with Denver Snuffer re jury instructions; Email Wayne Klein re same; Conference with Jasmine Leonardi; Email court re Taylor payment; Draft notice of dismissal; Email Wayne Klein re same; Email Joanne Shields re same; File preliminary jury instructions; Email court clerk re same	5.90	1,711.00
1/06/23	TMM	Trial preparation. Draft opening statement, review exhibits and prepare cross	10.70	5,296.50
1/06/23	JL	Prepare for trial; Correspondence with Judge Nuffers' chambers re exhibits; Update exhibits; Discussions with Jeffery Balls re same; Review jury questionnaires	3.20	480.00

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1/07/23	JAB	Review opening statement; Review and revise trial testimony outline; Review depositions of Randale and LaGrand Johnson	2.30	667.00
1/07/23	TMM	Trial preparation. Revise opening statement; Review exhibits and draft cross outline	9.20	4,554.00
1/08/23	TMM	Trial preparation. Work on opening and Snow cross	7.40	3,663.00
1/08/23	JL	Prepare for trial; Load trial exhibits into Trial Director	2.60	390.00
1/09/23	JAB	Prepare for trial; Attend jury selection and trial; Conference with Jasmine Leonardi; Conference with Tom Melton; Review deposition of Randale Johnson	12.00	3,480.00
1/09/23	TMM	Trial. Opening and cross examination; prepare additional cross and closing	15.20	7,524.00
1/09/23	JL	Prepare for and attend trial	9.60	1,440.00
1/10/23	JAB	Prepare for trial; Attend trial; Review deposition of LaGrand Johnson; Conference with Tom Melton re closing; Review final jury instructions; Email court re same	14.30	4,147.00
1/10/23	TMM	Trial. Prepare closing. Review jury instructions and special verdict form	15.00	7,425.00
1/10/23	JL	Prepare for and attend trial	9.20	1,380.00
1/11/23	JAB	Prepare for trial; Attend trial; Review results of trial	8.40	2,436.00
1/11/23	TMM	Revise closing; Trial	8.10	4,009.50
1/11/23	JL	Prepare for and attend trial	8.90	1,335.00
1/12/23	JAB	Review jury verdict form; Review correspondence from Wayne Klein; Revise stipulated dismissal for Taylor	.50	145.00
1/12/23	TMM	Review trial notes; emails re same. Review final jury verdict.	4.00	1,980.00
1/13/23	JAB	Review pleadings in light of trial; Review post-judgment motions; Conference with Robert Wing re claims	.80	232.00
1/14/23	JAB	Review motions to withdraw as counsel for Scraggs and Kerrs	.20	58.00
1/16/23	JAB	Review Snow pleadings; Review and revise seventeenth quarterly report; Revise dismissal of Taylor; Email Joann Shields re same	1.50	435.00
1/17/23	JAB	Email Wayne Klein re objection to jury instructions; Review court filings	.40	116.00
1/18/23	JAB	Review order re status report for Johnson v. Mancini; Email Wayne Klein re same; Telephone conference with Shane Johnson; Telephone conference with Ed Wall; Email Ed Wall re communication with Neldon Johnson; Telephone conference with Kathy Nester; Telephone conference with Amie Trujillo; Draft objection to jury instructions	2.30	667.00
1/19/23	JAB	Finalize objection to jury instructions	1.00	290.00
1/21/23	JAB	Review correspondence re settlement; Correspond with Wayne Klein re same	.60	174.00
1/23/23	JAB	Review correspondence re LaGrand and Randale; Review court pleadings	.20	58.00
1/23/23	TMM	Review LeGrand settlement emails	2.30	1,138.50
1/24/23	JAB	Draft discovery responses to second set of discovery requests	1.40	406.00

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Date	Tkpr	Description	Hours	Amount
1/26/23	JAB	Review order approving settlement; Email Wayne Klein re same; Draft discovery responses to NSDP	.50	145.00
1/27/23	JAB	Review correspondence from Steven Paul; Draft release of writ of garnishment; Telephone conference with Robert Tilden	1.10	319.00
2/03/23	JAB	Draft discovery responses to NSDP	1.60	464.00
2/09/23	JAB	Draft responses to discovery requests	1.20	348.00
2/13/23	JAB	Draft discovery responses; Telephone conference with Wayne Klein	1.30	377.00
2/14/23	JAB	Review documents for production; Draft discovery responses	2.20	638.00
2/15/23	JAB	Draft responses to discovery requests; Correspond with Wayne Klein re same; Review documents for discovery requests	4.80	1,392.00
2/16/23	JAB	Draft supplemental responses to discovery; Correspond with Wayne Klein; Review NSDP document	3.20	928.00
2/17/23	JAB	Finalize discovery responses; Coordinate production of documents; Coordinate production with Jasmine Leonardi; Email Mike Skolnick re same	1.10	319.00
2/17/23	JL	Review initial disclosures in Nelson Snuffer matter; Prepare supplemental document production; Discussion with Jeffery Balls re same	1.30	195.00
2/24/23	JAB	Review correspondence re status report of Mancini; Telephone conference with Neldon Johnson; Draft status report for Mancini	.80	232.00
2/28/23	JAB	Draft status report re stay of Johnson v. Mancini; Email Wayne Klein re same; Review and revise litigation status report; Email Wayne Klein re same	1.80	522.00
3/01/23	JAB	Review litigation report; Review correspondence from Wayne Klein	.30	87.00
3/07/23	JAB	Review order granting fee application; Email Wayne Klein re same; Review correspondence from Wayne Klein; Draft satisfaction of judgment for Kirk Newman	.70	203.00
3/09/23	JAB	Review notice of hearing in Jameson; Email Wayne Klein re same; Coordinate with Amanda Bradley re motion to appoint personal representative	.80	232.00
3/09/23	AB	Communications with Jeffery Balls re preparation of probate documents to appoint personal representative for Richard Jameson; Review Utah and Riverside County (California) court records for existing probate proceedings; Draft probate documents; Proofread and edit same	1.20	270.00
3/14/23	JAB	Draft motion to lift stay and dismiss with prejudice	.40	116.00
3/16/23	JAB	Review orders on summary judgment; Email Wayne Klein re same	1.40	406.00
3/17/23	JAB	Review correspondence from Wayne Klein re summary judgment orders	.30	87.00
3/20/23	JAB	Review Johnson v. IRS cases; Review court order; Correspond with Wayne Klein re same; Draft motion to lift stay and dismiss Johnson v. Mancini	1.30	377.00
3/21/23	JAB	Telephone conference with Wayne Klein	1.30	377.00
3/22/23	JAB	Attend hearing for Jameson; Review case law; Review voicemail from Neldon Johnson	2.50	725.00

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Date	Tkpr	Description	Hours	Amount
3/23/23	JAB	Telephone conference with Wayne Klein; Review court minute entry; Draft briefing re Rule 25	1.00	290.00
3/24/23	JAB	Review case law re Rule 25; Draft brief re same; Draft reply re IRS	2.40	696.00
3/27/23	JAB	Draft brief re Rule 25; Draft motion to lift stay and dismiss with prejudice	2.10	609.00
3/28/23	JOH	Review client re potential purchase of interest	.10	37.00
3/28/23	JAB	Email Wayne Klein re Rule 25 motion; Telephone conference with Steven Paul; Call Neldon Johnson; Review	2.50	725.00
3/30/23	JOH	Review filing; Correspond by email with Receiver re same; Correspond by email with Jeff Balls re stay	.40	148.00
3/30/23	JAB	Revise brief re rule 25; Draft status report for Johnson v. IRS matters; Draft notice of appearance; Correspond with Wayne Klein re same; Draft status update for LaGrand and Randale; Telephone conference with Steven Paul; Telephone conference with Wayne Klein	3.80	1,102.00
<b>TOTAL PROFESSIONAL SERVICES</b>				<b>\$ 85,016.00</b>

## SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	.50	185.00
Jeffery A Balls	290.00	115.50	33,495.00
Thomas M Melton	495.00	88.80	43,956.00
Jasmine Leonardi - Paralegal	150.00	47.40	7,110.00
Amanda Bradley - Paralegal	225.00	1.20	270.00
<b>TOTALS</b>		<b>253.40</b>	<b>\$ 85,016.00</b>

## COSTS ADVANCED

Date	Description	Amount
3/09/23	Superior Court of California, County of Riverside - searches	3.50
3/28/23	St George District Court - petition application for informal appointment of personal representative	375.00

**TOTAL COSTS ADVANCED** **\$ 378.50**

**TOTAL THIS INVOICE** **\$ 85,394.50**



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## REMITTANCE ADVICE

RE: Litigation

**BALANCE DUE THIS INVOICE**

**\$ 85,394.50**

Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

### Wire Transfer Instructions

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

### E-Check

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

### EFT/ACH Pay Instructions

Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 924797**

**Online Payments:** <https://parrbrown.com/payment-portal>  
**Payments accepted by phone (801) 532-7840**  
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice