



October 15, 2023

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

Invoice: 934239
Client: 176390
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Appeal

Professional Services	\$ 1,058.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,058.00

PARR BROWN GEE & LOVELESS

Invoice: 934239
 RaPower-3 Receivership
 Appeal

October 15, 2023
 Client: 176390
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/14/23	JOH	Analyze Tenth Circuit opinion and related email correspondence	.30	111.00
7/14/23	JAB	Review appellate ruling; Review correspondence from Wayne Klein re same	1.40	406.00
8/07/23	JAB	Review decision of 10th circuit; Email Wayne Klein re same	.90	261.00
8/08/23	JOH	Review Tenth Circuit opinion	.60	222.00
8/29/23	JAB	Review mandate issued in cases	.20	58.00

TOTAL PROFESSIONAL SERVICES**\$ 1,058.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	.90	333.00
Jeffery A Balls	290.00	2.50	725.00
TOTALS		3.40	\$ 1,058.00

TOTAL THIS INVOICE**\$ 1,058.00**



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REMITTANCE ADVICE

RE: Appeal

BALANCE DUE THIS INVOICE

\$ 1,058.00

Please return this advice with payment to:

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

Wire Transfer Instructions

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

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Routing #: _____
Account #: _____
Name on Account: _____
Account Holder Address: _____
Amount: \$ _____

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Account #: 912454114

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Invoice: 934240
Client: 176390
Matter: 4

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Litigation

Professional Services	\$ 49,628.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 49,628.00

PARR BROWN GEE & LOVELESS

Invoice: 934240
 RaPower-3 Receivership
 Litigation

October 15, 2023
 Client: 176390
 Matter: 4

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/05/23	JAB	Draft trial brief; Telephone conference with Wayne Klein	2.40	696.00
7/06/23	JAB	Draft trial brief	1.50	435.00
7/10/23	JAB	Draft pretrial disclosures for LaGrand/Randale; Correspond with Michael Skolnick	1.70	493.00
7/11/23	JAB	Correspond with Michael Skolnick; Review and revise quarterly report	.60	174.00
7/12/23	JAB	Finalize quarterly report; Prepare pretrial disclosures; Telephone conference with Michael Skolnick	5.10	1,479.00
7/13/23	JAB	Review correspondence re mediation; Draft trial brief	1.00	290.00
7/17/23	JAB	Review trial order; Correspond re mediation; Draft jury instructions	3.30	957.00
7/18/23	JAB	Draft advanced questionnaire; Correspond with Wayne Klein re same; Email Steven Paul re same; Draft trial brief	2.40	696.00
7/25/23	JAB	Draft motion to amend scheduling order for NSDP; Email Mike Skolnick; File proposed advanced jury questionnaire	1.30	377.00
7/26/23	JAB	Review advanced jury questionnaire; Draft trial brief	2.30	667.00
7/27/23	JAB	Draft trial brief; Prepare trial exhibits; Correspond with Wayne Klein	3.90	1,131.00
7/28/23	JAB	Draft verdict form; Draft jury instructions; Telephone conference with Mike Skolnick; Revise amended scheduling order	2.90	841.00
8/02/23	JAB	Draft jury instructions; Draft special verdict form; Revise trial brief	2.10	609.00
8/03/23	JAB	Review and revise jury instructions; Draft mediation brief	2.20	638.00
8/04/23	JAB	Revise proposed jury instructions; Conference with Wayne Klein	1.10	319.00
8/08/23	JAB	Review and revise jury instructions; Draft motion in limine	2.60	754.00
8/09/23	TMM	Review special verdict form; Email re same	1.00	495.00
8/10/23	JAB	Draft and revise jury instructions and verdict form; Draft motion in limine re tax fraud; Draft mediation brief; Review deposition designations; Telephone conference with Tom Melton	7.00	2,030.00
8/11/23	JAB	Draft mediation memorandum; Draft trial brief	6.50	1,885.00
8/11/23	TMM	Review jury instructions, special verdict form; Review order on motion for summary judgment	5.50	2,722.50
8/14/23	JAB	Review and revise mediation memorandum; Telephone conference with Steven Paul re jury instructions; Correspond with court re trial dates	5.30	1,537.00
8/15/23	JAB	Telephone conference with Steven Paul; Prepare designation of witness testimony; Draft pretrial order	6.40	1,856.00
8/15/23	TMM	Review jury instructions, special verdict form, proposed voir dire questions	3.20	1,584.00
8/16/23	JAB	Review depositions of Randale and LaGrand; Review trial order; Draft motion in limine	6.40	1,856.00
8/17/23	JMC	Correspond with Jeff Balls re bankruptcy filing and non-discharge issues related to Randale Johnson's filing and other threatened filing	.70	245.00

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Date	Tkpr	Description	Hours	Amount
8/17/23	JAB	Review deposition transcripts; Draft motion in limine; Draft trial brief; Telephone conference with Steven Paul and Denver Snuffer; Conference with Joseph Covey; Telephone conference with Wayne Klein; Review bankruptcy documents	5.90	1,711.00
8/17/23	CY	Redact trial exhibits	.70	119.00
8/18/23	JAB	Draft motions in limine; Conference with Jasmine Leonardi and Crista Yancy; Correspond with Steven Paul	4.50	1,305.00
8/18/23	CY	Redact trial exhibits; Meeting with Jeffery Balls and Jasmine Leonardi re Trial	1.00	170.00
8/18/23	JL	Conference with Jeff Balls and Crista Yancey re trial preparation	.50	75.00
8/21/23	JAB	Attend mediation; Conference with Mike Skolnick; Telephone conference with Wayne Klein; Draft motion in limine	7.90	2,291.00
8/22/23	JMC	Correspond with Jeff Balls re bankruptcy issues	.30	105.00
8/22/23	JAB	Draft motions in limine; Telephone conference with Tom Melton; Draft proposed orders; Review documents; Draft pretrial order	5.80	1,682.00
8/22/23	TMM	Review bankruptcy and schedules; Emails re same; Telephone conference with Wayne Klein re bankruptcy stay issues; Telephone conference with Jeff Balls re same; Review case re dischargeability of fraudulent transfer claims; Review motions in limine	4.70	2,326.50
8/23/23	JAB	Review and revise pretrial order; Review trial exhibits	2.10	609.00
8/23/23	TMM	Review special verdict form, jury instructions; Review orders re motions in limine; Emails re same	2.50	1,237.50
8/25/23	JAB	Telephone conference with Steven Paul; Correspond with Steven Paul; Telephone conference with Wayne Klein; Draft proposed pretrial order	1.50	435.00
8/28/23	JAB	Review settlement offer; Email Wayne Klein re same; Email Steven Paul; Draft proposed pretrial order	1.00	290.00
8/29/23	JAB	Prepare trial exhibits; Finalize deposition designation form; Draft notice of filing for deposition designation form; Revise pretrial order; Review bankruptcy pleadings; Review opposition to motion in limine re reasonably equivalent value; Email Wayne Klein re same	5.30	1,537.00
8/29/23	TMM	Review motion in limine; Review pretrial order	1.20	594.00
8/30/23	JAB	Telephone conference with Steven Paul; Review correspondence from Wayne Klein re motions in limine; Correspond with Wayne Klein and Tom Melton	2.20	638.00
8/30/23	TMM	Review and revise pretrial order; Emails re same; Begin exhibit review	3.00	1,485.00
8/31/23	JAB	Review and revise litigation report; Email Wayne Klein re same; Email Wayne Klein re order granting fee application; Draft trial outline	.40	116.00
9/01/23	JAB	Review orders on motions in limine; Email Wayne Klein re same	.20	58.00
9/05/23	JAB	Review bankruptcy documents for Randale Johnson; Prepare trial exhibits; Revise trial brief; Conference with Jasmine Leonardi; Prepare trial outline	2.80	812.00
9/05/23	JL	Review and prepare trial exhibits; Discussion with Jeff Balls re same; Review pretrial disclosures	.40	60.00

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Date	Tkpr	Description	Hours	Amount
9/06/23	JAB	Review correspondence from Wayne Klein	.10	29.00
9/06/23	TMM	Review pretrial brief, pretrial order, response to motion in limine, and order; Review exhibits and Wayne Klein email re cross examination preparation	6.20	3,069.00
9/07/23	JAB	Review correspondence from Judge Nuffer re pretrial issues; Telephone conference with Steven Paul; Email Wayne Klein re settlement offer; Draft note and trust deed; Review settlement offer	2.90	841.00
9/07/23	TMM	Review emails re settlement, trust deed, and lien	.70	346.50
9/07/23	JL	Conference with Ryan Robertson re trial logistics; Prepare marked trial exhibits	.20	30.00
9/08/23	JAB	Revise trust deed; Email Steven Paul re settlement; Telephone conference with Steven Paul; Telephone conference with Wayne Klein; Draft notice of settlement; Email Judge Nuffer re settlement	1.20	348.00
9/08/23	TMM	Review emails re settlement, pretrial conference	.50	247.50
9/11/23	JAB	Revise notice of settlement and motion to approve settlements; File same; Attend status conference; Conference with Wayne Klein	1.20	348.00
9/11/23	TMM	Attend pretrial conference	.30	148.50
9/12/23	JAB	Review correspondence re bankruptcy; Review minute entries	.20	58.00
9/20/23	JAB	Review tax appeal case; Telephone conference with Glenda Johnson; Telephone conference with Wayne Klein; Telephone conference with Mike Skolnick	1.60	464.00
9/28/23	JAB	Review bankruptcy matter	.40	116.00
9/29/23	JAB	Draft complaint against Randale Johnson for non discharge; Research case law	4.00	1,160.00
TOTAL PROFESSIONAL SERVICES				\$ 49,628.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	350.00	1.00	350.00
Jeffery A Balls	290.00	119.20	34,568.00
Thomas M Melton	495.00	28.80	14,256.00
Jasmine Leonardi - Paralegal	150.00	1.10	165.00
Crista Yancey - Paralegal	170.00	1.70	289.00
TOTALS		151.80	\$ 49,628.00

TOTAL THIS INVOICE**\$ 49,628.00**



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