



July 15, 2022

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

Invoice: 911319  
Client: 176390  
Matter: 3

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Appeal**

Professional Services	\$ 8,352.00
Total Costs Advanced	<u>\$ 1,120.74</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 9,472.74</b>
Previous Balance	<u>\$ 1,015.00</u>
<b>TOTAL BALANCE DUE</b>	<b><u><u>\$ 10,487.74</u></u></b>

PARR BROWN GEE & LOVELESS

Invoice: 911319  
 RaPower-3 Receivership  
 Appeal

July 15, 2022  
 Client: 176390  
 Matter: 3

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
4/01/22	JAB	Review appellate briefs in preparation for oral argument in commission cases	1.20	348.00
4/04/22	JAB	Telephone conference with Court clerk re oral argument; Review briefs in preparation for oral argument	.30	87.00
4/07/22	JAB	Prepare for oral argument	2.90	841.00
4/22/22	JAB	Review rehearing request from Glenda Johnson; Email Wayne Klein re same	.50	145.00
4/25/22	JAB	Review appellate order; Email Wayne Klein re same; Prepare for oral argument	.20	58.00
5/03/22	JAB	Review mandate from appellate court	.20	58.00
5/13/22	JAB	Prepare for 10th circuit oral argument	1.00	290.00
5/17/22	JAB	Prepare for oral argument; Travel to Denver	8.30	2,407.00
5/18/22	JAB	Prepare for oral argument	5.30	1,537.00
5/19/22	JAB	Prepare for and attend oral argument before 10th Circuit; Return travel to Utah	8.90	2,581.00

**TOTAL PROFESSIONAL SERVICES \$ 8,352.00**

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jeffery A Balls	290.00	28.80	8,352.00
<b>TOTALS</b>		<b>28.80</b>	<b>\$ 8,352.00</b>

**COSTS ADVANCED**

Date	Description	Amount
4/06/22	Airfare, Delta Air, Jeff Balls	300.20
5/17/22	Non-local rental car/taxi, Regional Transportation District, Jeff Balls	10.50
5/18/22	FedEx - copies	7.25
5/19/22	Hotel, Hyatt Centric, Jeff Balls	763.29
5/19/22	Salt Lake City Airport, Jeff Balls parking	29.00
5/19/22	Out-of-town Travel, Regional Transportation District, Jeff Balls	10.50

**TOTAL COSTS ADVANCED \$ 1,120.74**

**TOTAL THIS INVOICE \$ 9,472.74**

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**ACCOUNTS RECEIVABLE INVOICES OUTSTANDING**

<b>Invoice Number</b>	<b>Date</b>	<b>Invoice Total</b>	<b>Payments Received</b>	<b>Ending Balance</b>
907600	4/27/22	1,015.00	.00	1,015.00

Note: Invoices preceded by 9999 represent a finance charge of twelve percent (12%) per annum on any account not paid within thirty (30) days after the date of the invoice.

Previous Balance	\$ 1,015.00
Current Invoice	<u>\$ 9,472.74</u>
<b>TOTAL BALANCE DUE</b>	<b><u>\$ 10,487.74</u></b>



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**REMITTANCE ADVICE**

**RE: Appeal**

<b>BALANCE DUE THIS INVOICE</b>	<b>\$ 9,472.74</b>
Previous Balance	<u>\$ 1,015.00</u>
<b>TOTAL BALANCE DUE</b>	<b><u>\$ 10,487.74</u></b>

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

To Pay by Credit Card:

Visa  Mastercard  Discover  Amex  
Credit Card # \_\_\_\_\_  
Expiration Date \_\_\_\_/\_\_\_\_  
Security Code # \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Billing Address: \_\_\_\_\_

Amount: \$ \_\_\_\_\_

**Payments accepted by phone (801) 532-7840**

EFT/ACH Payment Instructions

Routing #: 124001545  
Account #: 912454114

Online Payment: [www.parrbrown.com](http://www.parrbrown.com)

**Please reference your invoice # 911319**

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





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Matter: 4

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Litigation**

Professional Services	\$ 60,534.50
Total Costs Advanced	<u>\$ 713.10</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 61,247.60</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 911320  
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 Litigation

July 15, 2022  
 Client: 176390  
 Matter: 4

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
4/01/22	JAB	Draft status report re Plaskolite litigation; Review cashiers check from Chase Bank re Reinhold Finkes; Draft trial brief for Snow/Taylor; Conference with Cynthia Love; Correspond with Wayne Klein re Plaskolite deposition; Correspond with Phil Downey re Plaskolite deposition	2.70	783.00
4/04/22	JAB	Draft trial brief for Snow and Taylor; Email Phil Downey re Plaskolite deposition; Telephone conference with Steven Paul	1.70	493.00
4/05/22	JAB	Draft request to submit for motion to authorize sale of property; Email Wayne Klein re same; Revise motion to approve assignment of judgments; Email Wayne Klein re same; Review court filings re Snow/Taylor trial; Email Glenda Johnson re deposition	1.50	435.00
4/07/22	JAB	Email Wayne Klein re order authorizing sale of Millard county property; Review amended trial order; Review orders on motions in limine; Email Wayne Klein re same	.70	203.00
4/08/22	JAB	Review and revise fourteenth quarterly status report; Email Wayne Klein re same; Review motions to extend time to respond to motion for summary judgment for LaGrand, Randale, and Matthew Shepard; Email Steven Paul re same	.90	261.00
4/11/22	JAB	Finalize quarterly report; Review garnishment documents from MidFirst Bank re Linda and Steven Payne; Draft satisfaction of judgment for Paynes; Review correspondence from Glenda Johnson; Review Glenda Johnson discovery responses; Email Wayne Klein re Glenda Johnson	2.60	754.00
4/12/22	JAB	Correspond with Wayne Klein re Glenda Johnson; Review pleadings for Glenda Johnson; Research summary judgment motion against Glenda Johnson	1.10	319.00
4/13/22	JAB	Review settlement offer re Paul Brennan; Review Brennan judgment and property; Email Wayne Klein re same; Research judgment liens	1.70	493.00
4/14/22	JAB	Review judgments and asset information for judgment liens	.80	232.00
4/15/22	JAB	Draft motion for extension; Email Glenda Johnson re same; Telephone conference with Glenda Johnson	.30	87.00
4/18/22	JAB	Review order granting thirteenth fee application; Review order granting motion to amend scheduling order; Review Plaskolite documents	.30	87.00
4/19/22	JAB	Draft notice of deposition for Plaskolite; Email Phil Downey re same; Review Plaskolite documents	.50	145.00
4/20/22	JAB	Prepare for Plaskolite deposition	1.10	319.00
4/21/22	JAB	Prepare for Plaskolite deposition; Take deposition of Plaskolite	4.50	1,305.00
4/25/22	JAB	Draft entry of judgment and notice of entry of judgment; Review summary judgment oppositions	2.40	696.00
4/26/22	JAB	Review opposition memorandum to summary judgment in Lagrand, Randale, and Matthew Shepard matters	4.90	1,421.00

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<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
4/27/22	JAB	Telephone conference with Steven Paul; Telephone conference with Wayne Klein; Draft reply memorandum in support of motion for partial summary judgment against Randale Johnson; Review Windham matter; Correspond with Jon Hafen re status	2.10	609.00
4/28/22	JAB	Draft reply memorandum in support of summary judgment motion against Randale Johnson; Draft reply memorandum in support of summary judgment motion against Matthew Shepard; Finalize filings to domesticate judgment; Email Meritas firms re judgment liens in other states	2.40	696.00
4/29/22	JAB	Call court clerk re judgment; Refile notice of entry of judgment; Email Josh Schierloh re domestication of judgment in Ohio; Draft reply memorandum in support of motion for summary judgment against Matthew Shepard	3.20	928.00
5/02/22	JAB	Draft reply memorandum in support of motion for summary judgment against Matthew Shepard; Review correspondence re domestication of judgments and judgment liens	4.90	1,421.00
5/03/22	JAB	Draft reply memorandum in support of motion for summary judgment against Matthew Shepard	4.70	1,363.00
5/04/22	JAB	Draft reply memorandum in support of motion for partial summary judgment against Matthew Shepard	4.20	1,218.00
5/05/22	JAB	Telephone conference with Geoff Chesnut; Email Geoff Chesnut re Paul Brennan; Email reporter re exhibits	1.70	493.00
5/06/22	JAB	Draft reply memorandum in support of motion for summary judgment for Matthew Shepard; Draft motion for extension of time to file reply memorandum for Matthew Shepard and Randale Johnson; Email Phil Downey	2.80	812.00
5/07/22	JAB	Draft reply memorandum in support of motion for partial summary judgment against Matthew Shepard	1.80	522.00
5/09/22	JAB	Draft reply memorandum in support of partial motion for summary judgment against Matthew Shepard and Randale Johnson; Review and revise motion to sell Delta warehouse; Email Dan Applegate re attorney fees; Email David Castleberry re attorney fee application; Review correspondence from Mike Skolnick re discovery	4.50	1,305.00
5/10/22	JAB	Draft reply memorandum in support of motion for summary judgment against Randale Johnson	4.20	1,218.00
5/11/22	JAB	Revise reply memorandum in support of motion for partial summary judgment against Matthew Shepard; Draft reply memorandum in support of motion for partial summary judgment against Randale Johnson; Draft motion to extend trial deadlines for Randale Johnson; Draft motion for extension of time for LaGrand Johnson	2.30	667.00
5/12/22	JAB	Telephone conference with Mike Skolnick; Finalize and file motion for extensions to file reply memoranda for Plaskolite & Johnsons	1.10	319.00
5/16/22	JAB	Draft reply memorandum in support of motion for partial summary judgment against Randale Johnson	5.00	1,450.00
5/17/22	CDL	Telephone conference re trial logistics	.30	76.50

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Date	Tkpr	Description	Hours	Amount
5/18/22	JAB	Revise reply memorandum for summary judgment for Randale Johnson	.30	87.00
5/18/22	CDL	Review materials re Snow/Taylor trial	2.30	586.50
5/20/22	JOH	Review email correspondence and pleadings re upcoming trial; Prepare for and participate in meeting with legal team re trial strategy	.90	333.00
5/20/22	JAB	Review and revise reply memoranda in support of motions for partial summary judgment against Matthew Shepard and Randale Johnson; Conference with Jonathan Hafen and Cynthia Love re Snow/Taylor trial; Email Wayne Klein re Kinsey matter	4.20	1,218.00
5/23/22	JAB	Review and revise litigation status report; File notice of dismissal for Ed Kinsey; Draft reply memorandum in support of motion for summary judgment against Plaskolite; Conference with Cynthia Love re same	7.60	2,204.00
5/23/22	CDL	Draft reply in support of motion for summary judgment for Plastolite	9.40	2,397.00
5/24/22	JAB	Draft reply memorandum in support of partial summary judgment against LaGrand Johnson	4.50	1,305.00
5/25/22	JAB	Draft reply memorandum in support of partial motion for summary judgment against LaGrand Johnson; Review documents from Nelson Snuffer	5.90	1,711.00
5/26/22	JAB	Draft reply memorandum for LaGrand Johnson; Review correspondence from Steven Paul re settlement; Email Wayne Klein re same; Draft trial brief for Snow and Taylor	3.10	899.00
5/27/22	JAB	Draft trial brief	2.80	812.00
5/30/22	JAB	Draft pretrial order	.40	116.00
5/31/22	JAB	Review order granting motion to assign judgments	.10	29.00
6/01/22	JOH	Follow up re status of pretrial conference	.10	37.00
6/01/22	JAB	Telephone conference with Steven Paul; Correspond with Cynthia Love re schedule for pretrial conference	.40	116.00
6/01/22	CDL	Email to court re changing date and time of pretrial conference in Snow/Taylor matters	.20	51.00
6/02/22	JAB	Telephone conference with Mike Skolnick; Draft pretrial order for Taylor and Snow	6.20	1,798.00
6/02/22	CDL	Review draft pretrial order; telephone conference with Jeff Balls re pretrial conference	.10	25.50
6/03/22	JOH	Attend to Pre-Trial Order; Prepare for pre-trial conference	.20	74.00
6/03/22	JAB	Revise litigation status report; Draft pretrial order for Taylor/Snow; Telephone conference with Steven Paul re pretrial order; Correspond with Wayne Klein and Cynthia Love re pretrial order	4.80	1,392.00
6/03/22	CDL	Telephone conference with Jeff Balls; review proposed changes to pretrial order; email re same	.70	178.50
6/06/22	JOH	Follow up with legal team re status of pre-trial conference	.10	37.00
6/06/22	JAB	Draft trial brief; Email Wayne Klein re same; Review trial exhibits; Email Wayne Klein re same; Review joint statement for Richard Jameson matter; Email Justin Heideman re same	4.10	1,189.00



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Date	Tkpr	Description	Hours	Amount
6/07/22	JOH	Review Pre-Trial Brief and related email correspondence; Prepare for upcoming Pre-Trial Conference	.80	296.00
6/07/22	JAB	Revise trial brief; Review trial exhibits; Correspond with Justin Heideman; Review NSDP documents	5.30	1,537.00
6/08/22	JOH	Review updated Pretrial Brief and related correspondence	.40	148.00
6/08/22	JAB	Correspond with Wayne Klein re checks for Taylor and Snow; Draft and revise trial brief; Conference with Jasmine Leonardi re trial exhibits	3.60	1,044.00
6/08/22	JL	Conference with Jeff Balls re trial preparation; Prepare trial exhibits	.70	105.00
6/09/22	JOH	Final review of pretrial brief and correspond by email with legal team re same	1.10	407.00
6/09/22	JAB	Draft and revise trial brief; Conference with Jasmine Leonardi; Telephone conference with Jeffrey Chestnut re Paul Brennan	3.60	1,044.00
6/09/22	CDL	Review and revise trial brief; review documents in preparation for pretrial conference	1.40	357.00
6/09/22	JL	Prepare trial exhibit index; Prepare witness list; Prepare and mark trial exhibits; Discussions with Jeffery Balls re same	6.90	1,035.00
6/10/22	JOH	Review pre-trial disclosures; Prepare for upcoming hearing	.10	37.00
6/10/22	JAB	Draft request to submit for Delta warehouse auction; Finalize status report for Richard Jameson and arrange filing of same; Draft request to submit for 14th application for attorney fees and arrange filing of same; Review trial exhibits; Review and finalize trial disclosures; Conference with Jasmine Leonardi; Finalize trial brief	6.10	1,769.00
6/10/22	JL	Prepare trial exhibit index and witness list; Prepare and mark trial exhibits; Discussions with Jeffery Balls re same	3.70	555.00
6/13/22	JOH	Review jury instructions and email from Court; Prepare for pretrial conference	.50	185.00
6/13/22	JAB	Review NSDP documents	4.40	1,276.00
6/13/22	JL	Prepare trial exhibits and send to Judge Nuffer	1.30	195.00
6/14/22	JAB	Draft amended scheduling order for Glenda Johnson; Email same to Glenda Johnson; Review NSDP documents; Conference with Cynthia Love re trial; Review trial brief of Taylor and Snow; Telephone conference with Wayne Klein re Snow/Taylor trial; Telephone conference with Mike Skolnick	6.00	1,740.00
6/15/22	JOH	Prepare for and participate in pre-trial conference; Call with legal team re case strategy	1.30	481.00
6/15/22	JAB	Prepare for pretrial conference; Attend pretrial conference; Conference with Jonathan Hafen and Cynthia Love; Review NSDP documents	6.00	1,740.00
6/15/22	CDL	Prepare for and attend final pretrial conference; review documents in preparation for trial	2.10	535.50
6/15/22	JL	Attend final pretrial conference	.90	135.00
6/16/22	JOH	Review email correspondence from Court re changing of judge; Correspond by email with legal team re same	.20	74.00

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Date	Tkpr	Description	Hours	Amount
6/16/22	JL	Discussion with Ryan Robertson at court re trial equipment set up and test; Email team re same	.20	30.00
6/17/22	JOH	Analyze strategic options in light of Judge Nuffer decision to reassign cases; Correspond by email with legal team re same	.40	148.00
6/17/22	JAB	Review correspondence from Judge Nuffer; Email team re same; Email Wayne Klein re consent to magistrate; Draft trial outline for Snow/Taylor trial	2.10	609.00
6/17/22	JL	Prepare trial director database	.30	45.00
6/20/22	JOH	Correspond by email with legal team re case strategy	.10	37.00
6/20/22	JAB	Draft trial outline for Snow/Taylor trial; Review request to submit for Plaskolite; Review NSDP documents; Review correspondence from Steven Paul	5.30	1,537.00
6/21/22	JAB	Review order granting attorney fees application; Email Wayne Klein re same; Review email re Plaskolite assignment; Email Wayne Klein re same	.50	145.00
6/22/22	JAB	Review case pleadings; Email Wayne Klein re reassignment of Plaskolite matter; Review NSDP documents	.80	232.00
6/23/22	JAB	Review NSDP documents; Review trial order for LeGrand Johnson; Call Steve Bowers	5.60	1,624.00
6/24/22	JAB	Review case reassignments from Judge Nuffer; Email Wayne Klein re same; Draft supplemental responses to discovery for NSDP	1.50	435.00
6/24/22	CDL	Review updates re case reassignments	.30	76.50
6/27/22	JAB	Call Parrish court clerk re trial schedule; Draft supplemental discovery responses to NSDP; Conference with Cynthia Love re motion for summary judgment against NSDP; Review notices of reassignment; Email Wayne Klein re same	4.00	1,160.00
6/27/22	CDL	Telephone conference with Jeff Balls re motion for summary judgment; revise same	5.30	1,351.50
6/28/22	JAB	Telephone conference with Steve Paul; Email Lindsay Hola trial dates; Review scheduling orders	.70	203.00
6/29/22	JOH	Review communications from court re reassignment of cases and related matters	.10	37.00
6/29/22	JAB	Review motion to amend scheduling order for Nelson Snuffer; Email Mike Skolnick re same; Review correspondence from James Lee	.50	145.00
6/30/22	JOH	Review email correspondence from opposing counsel re trial scheduling and related matters	.10	37.00
6/30/22	JAB	Email James Lee re pretrial conference; Email Wayne Klein re rescheduled cases; Review case status and scheduling orders	.90	261.00

**TOTAL PROFESSIONAL SERVICES**

**\$ 60,534.50**

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**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Jonathan O Hafen	370.00	6.40	2,368.00
Jeffery A Balls	290.00	173.90	50,431.00
Cynthia D Love	255.00	22.10	5,635.50
Jasmine Leonardi - Paralegal	150.00	14.00	2,100.00
<b>TOTALS</b>		<b>216.40</b>	<b>\$ 60,534.50</b>

**COSTS ADVANCED**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
4/15/22	District Court - documents	47.50
4/28/22	Salt Lake City District Court - entry of foreign judgment pursuant to Utah Code Ann. 78B-5-302; affidavit/declaration of Jeffery A. Balls (Roger Hamblin)	35.00
4/28/22	Salt Lake City District Court - entry of foreign judgment pursuant to Utah Code Ann. 78B-5-302; affidavit/declaration of Jeffery A. Balls (Paul Brennan)	35.00
5/12/22	DepoxaxMerit- Zoom Remote Connection	483.70
6/13/22	Salt Lake Legal - Scanning - OCR & New PDF's; Share File	111.90

**TOTAL COSTS ADVANCED \$ 713.10**

**TOTAL THIS INVOICE \$ 61,247.60**



July 15, 2022

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**REMITTANCE ADVICE**

**RE: Litigation**

**BALANCE DUE THIS INVOICE \$ 61,247.60**

Please return this advice with payment to:

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Wire Transfer Instructions:

JP Morgan Chase Bank  
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To Pay by Credit Card:

Visa  Mastercard  Discover  Amex  
Credit Card # \_\_\_\_\_  
Expiration Date \_\_\_\_/\_\_\_\_  
Security Code # \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Billing Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_  
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