

No. 49828-6-II

IN THE COURT OF APPEALS FOR THE STATE OF WASHINGTON
DIVISION II

SHELCON CONSTRUCTION GROUP, LLC,

Respondent

v.

SCOTT M. HAYMOND, et al.,

Appellants

BRIEF OF APPELLANT SCOTT M. HAYMOND

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THE TRIAL COURT DID NOT APPLY LODESTAR IN SETTING THE ATTORNEY’S FEES TO SCOTT HAYMOND. THE JUDGEMENT AMOUNT ORDERED WAS UNREASONABLE AND EXCESSIVE.

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1. The Lodestar Method is applicable in this action to determine the reasonableness of the attorney’s fees awarded towards this case.
2. R.P.C. 1.5(a) sets the standards for reasonableness of the fees charged. “A lawyer shall not make an agreement for, charge, or collect an unreasonable fee or an unreasonable amount for expenses.
3. Scott Fetzer Company v. Weeks,114 Wn.2d 109,786 P.2d 265 (1990). Sets the standard for reasonable attorney fees and exclusions for “wasteful or duplicative hours.”

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- b. Objection of Scott Haymond to Linville Request for attorney fees
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TABLE OF AUTHORITIES

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INTRODUCTION

This brief submitted by Scott M. Haymond is late because of the possibility that the main brief submitted by the Appellant Dara Odenwalder dated June 14, 2017, on the main component might have references to the limited separate dispute by Scott M. Haymond as to attorneys fees allowed by the trial court for Shelcon's Collection Services, including garnishment and contesting the Odenwalter trust.

The limited purpose and scope of this appeal is simply as to the Supplemental Judgement for attorney's fees in favor of the Linville Law Firm against Scott M. Haymond entered December 2, 2016.

There was no witnesses or evidence presented to the trial court by Shelcon Collection Services they presented only the Shelcon Collection Services' motion and hourly record submitted with Shelcon Collection Services counsel's declaration. Scott Haymond filed an objection. Therefore this brief simply attaches those documents as an Appendix for easy reference.

It is hoped that simply attaching these documents as an appendix will save the courts time in resolving the issue of reasonableness and applying the Lodestar Standard.

STATEMENT OF THE CASE

The supplemental judgment against Scott M. Haymond was incidental to the main issues involved in the Judgement entered December 2, 2016.

The motion for attorneys fees by the Linville Law Firm was for an award of \$89,950.50. The trial judge, Honorable Vickie L. Hogan reduced it to \$74,379.95. The trial courts order recited that the court applied the Lodestar Method to determine the reasonableness of the fees requested. Scott Haymond challenged that and filed an objection to the order giving specific examples of unreasonable computations. Copies of the Order and Objection are included in the Appendix.

PROCEDURAL HISTORY

This appeal comes following a fact finding hearing ordered on remand by this court on May 25, 2015, to determine certain issues that were unclear in the record on the first appeal of the trial court's order setting aside transfers of certain property interests to the Trust by Scott Haymond in 2006 pursuant to RCW 19.40 et. Seq..

In its May 27, 2015, ruling, this Court specifically asked the trial court to determine the following issues:

1. Whether the club rules permitted Mr. Haymond to transfer his club membership before the board approved the new member.
2. Whether Mr. Haymond retained his club membership after transferring his residence.

3. Whether or not Shelcon is entitled to possess a membership absent owning a residence.

This is not dealt with in this appeal as to attorney's fees only.

An evidentiary fact finding hearing was held October 3, 2016, before the Honorable Victoria Hogan, the same trial judge who heard this matter prior to the original appeal. Testimony and documentary evidence was presented at the hearing. The court announced its oral decision on October 11, 2016, RP 140-148.

Presentation of proposed Orders on the hearing was held on December 2, 2016. The trial court included a supplemental judgement for \$71,240.00 for attorney's fees against Scott Haymond which is the subject of this appeal.

ARGUMENT

The unchallenged rule for determining attorneys fees is the Lodestar Standard and R.P.C. 1.5(a). The objection by Haymond cited Scott Fetzer Co. v. Weeks, 114 Wn.2d 109,786 P2d 265 (1990) which sets out the standard as follows;

“A court must first determine that counsel expended a reasonable number of hours in securing a successful recovery for the client and to exclude from the requested hours any wasteful or duplicative hours and any hours pertaining to unsuccessful theories or claims.”

It would be unreasonable to ask the appellant court to review 48 pages of Linville records with over 200 entries to determine if Lodestar was applicable. A few examples cited

serve to apply Lodestar Method to the whole. Two or three examples were cited to the trial court and are set forth here.

1. Fees for obtaining the Declaration of McDermot (pages and dates of Linville records (in Attachment A)

Page 2	06/26/2012 Telephone Call- No Answer	\$ 55.00
	07/02/2012 Telephone calls	\$ 55.00
Page 3	07/18/2012 Meeting at McDermott Home	\$742.00
	07/24/2012 Work on McDermott Declaration	\$302.00
Page 4	08/02/2012 Conference Call with McDermott	\$110.00
	08/21/2012 Meeting obtaining Declaration of McDermott	\$385.00
Page 8	10/18/2013 Declaration of McDermott and LBL	\$175.00
Page 9	11/06/2013 Letter to McDermott	\$100.00
	12/13/2013 Telephone call with McDermott	\$ 75.00
	12/20/2013 Contact from McDermott (1/2)	\$ 96.25
	12/31/2013 Travel to McDermott's house to pick up Declaration	\$357.50
	01/07/2014 Meeting with McDermott re execution of Declaration	\$247.50
	01/15/2014 Review of McDermotts Declaration	<u>\$165.00</u>
Total for McDermott Declaration		\$2,865.75

2. Single Entries over \$1000.00 and “Work”

Page 10	01/28/2014 “Work” on Motion	\$1017.50
	01/30/2014 “Work” on Motion	\$1045.00
	01/31/2014 Research work on UFTA Motion	\$ 715.00
	02/13/2014 Work Motion	\$ 577.00
Page 11	02/20/2014 Complete Motion, Order and Declaration, Serve, File and Provide working copies to Judge Hogan	\$1,265.00
Page 12	03/12/2014 Receipt of opposition, draft response	
	03/13/2014 Receipt of responses revised proposed order	\$1,292.50

CONCLUSION

The application of the Lodestar Standard to the request of Lineville Law Firm for fees cannot justify the amount of \$71,240.00 awarded by the trial court. The hours spent totaling \$2,770.00 to obtain a declaration is simply one example of unreasonableness actions – driving to the witness home twice, not using the United States Postal System or fax. Dailing a phone number with no answer, \$55.00 is another example.

The proceedings were essentially a collection effort of the judgement by the Linville Law Office.

The court should vacate the Supplemental Judgement against Scott M. Haymond in the sum of \$71,240.00 and reduce it to \$25,000.00

APPENDIX

- a. Supplemental Judgement entered December 2, 2016
- b. Declaration of Lawrence B. Linville dated October 8, 2016, with 49 pages of entries, plus three pages of costs.
- c. Defendants Objection to Linville Law Firm's request for fees filed with the trial court.

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Slip Listing

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Slip ID	Dates and Time	Timekeeper Activity	Units DNB Time	Rate Info	Slip Value
	Posting Status	Client		Bill Status	
	Description	Reference			
	Odenwalder currently resides in Auburn, WA w/her husband Greg. Email to LBL.				
180164	TIME	Lawrence B. Linville	1.30	275.00	357.50
	5/1/2012	Preparation	0.00	T@1	
	WIP	ShelconConst.Odenwa			
0 X	Research Washington Practice on RCW Ch 6.17, Execution. Email Shane regarding same. Conference with DEL regarding execution on assets.				
180205	TIME	Lawrence B. Linville	0.20	275.00	55.00
	6/26/2012	Preparation	0.00	T@1	
	WIP	ShelconConst.Odenwa			
✓ X	Make calls to McDermitt. No answer.				
180227	TIME	Lawrence B. Linville	0.20	275.00	55.00
	7/2/2012	Preparation	0.00	T@1	
	WIP	ShelconConst.Odenwa			
✓ X	More calls to McDermitt regarding the Lake Tapps property.				
180238	TIME	Lawrence B. Linville	0.70	275.00	192.50
	7/15/2012	Preparation	0.00	T@1	
	WIP	ShelconConst.Odenwa			
X	Work on the Lake Tapps property. Writ of attachment or writ of execution. Looks like Haymond owns an undivided share interest in the Gun Club property located on Lake Tapps. Haymond also owns the house as personal property. Looks like the Writ of Execution is the way to go.				
180239	TIME	Lawrence B. Linville	1.20	275.00	330.00
	7/16/2012	Preparation	0.00	T@1	
	WIP	ShelconConst.Odenwa			
X	Work on Lake Tapps revocable living trust motion and application for writ of execution. Darra Haymond trustee. All will depend upon McDermott's deposition.				
180240	TIME	Lawrence B. Linville	0.10	275.00	27.50
	7/17/2012	Preparation	0.00	T@1	
	WIP	ShelconConst.Odenwa			
X	Call from Pierce County Superior Court regarding \$20 and Praeipce.				

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
180264	8/2/2012	TIME	WIP LBL conference with Rick McDermott regarding production of documents on the Lake Tapps property.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.40 0.00	275.00 T@1	110.00
180265	8/3/2012	TIME	WIP Calls to Pierce County Assessors Office regarding personal property taxes on the Lake Tapps property.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.30 0.00	275.00 T@1	82.50
180266	8/6/2012	TIME	WIP Follow up Christina at Pierce County Clerks Office regarding copies of cancelled checks on the Lake Tapps house.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.40 0.00	275.00 T@1	110.00
180292	8/21/2012	TIME	WIP LBL meeting with McDermott. Obtain declaration.	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.40 0.00	275.00 T@1	385.00
180349	10/9/2012	TIME	WIP LBL additional research on the Lake Tapps motion. In the event of a bankruptcy, Lake Tapps property would likely become an asset of the debtor's estate. Shelcon would be an unsecured, nonpriority general creditor. CW 6.25 is inappropriate.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.60 0.00	275.00 T@1	165.00
180370	12/3/2012	TIME	WIP Conference with client/DEL regarding appointment of receiver for South End LLC, Gracey and Lake Tapps property.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.20 0.00	275.00 T@1	55.00
180371	12/3/2012	TIME	WIP Phone call with Shane regarding collection, game plan.	David E. Linville Correspondence ShelconConst.Odenwa	0.40 0.00	250.00 T@1	100.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
180372	David E. Linville	0.60	250.00	150.00
12/5/2012	Correspondence	0.00	T@1	
WIP	ShelconConst.Odenwa			
Phone call with LBL re. motion re. Lake Tapps property, Anchors loans to Haymond and entities, whether to move for collection on Haymonds other assets now or wait until after payment from Anchor receivership, timing of motions, postponement of trial, having receiver appointed for various haymond properties, filing chattel lien concerning lake tapps property.				
180378	Lawrence B. Linville	0.70	275.00	192.50
2/11/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
X	Preparation of notice of deposition duces tecum. Serve Overland.			
180379	Lawrence B. Linville	0.60	275.00	165.00
2/12/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Conference with client, Shane Martin.				
180381	Lawrence B. Linville	1.10	275.00	302.50
2/18/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Revise Lake Tapps motion to include request for summary of foreclosure under Chattel Foreclosure statute. RCW Ch. 60.10. Conference with client.				
180384	Lawrence B. Linville	1.30	275.00	357.50
2/25/2013	Preparation	0.00	T@1	
WIP ?	ShelconConst.Odenwa			
X	Work on the Lake Tapps motion to invalidate Anchor Bank's deed of trust on the property. It is all going to get down to whether or not Haymond still owned 14224 Pioneer Way at the time he quit claimed 14224 Pioneer Way to A-1111 Venture LLC.			
180385	Lawrence B. Linville	3.10	275.00	852.50
2/26/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
X	Work on putting the Lake Tapps property up for sale pursuant to RCW 6.21, preparation of the RCW 6.17.100 affidavit. Ensure compliance with the Gagne case, prepare praecipe for order of sale, affidavit for writ of execution of real property			

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
(homestead) and affidavit for writ of execution real property (nonhomestead), order of sale, research exemption from Pierce County Sherriff's web site to reforeclosure. Looks like Shane will have to complete the affidavit pursuant to RCW 6.17.100. Research homestead law. Haymond lives permanently in the Lake Tapps residence, but he does not own the residence. Looks like Gagne v. Bailey, 17 Wn. App. 599 (1977) is right on point.				
180386 2/28/2013 WIP	TIME Lawrence B. Linville Preparation ShelconConst.Odenwa	0.80 0.00	275.00 T@1	165.00
Research with DEL on whether the Lake Tapps house is personal property or real property. It is taxed as personal property because the land is owned separately from the house. The Lake Tapps East End Rod & Gun Club own the land. The house is owned by Darra Odenwalder. Does that make a difference? Can we still execute without a bond?				
180506 6/28/2013 WIP	TIME David E. Linville Correspondence ShelconConst.Odenwa	0.25 0.00	250.00 T@1	62.50
Research SOL for UFTA claim, review Shelcons draft motion to sell the house, prepare memo to LBL re. SOL issue for the fraudulent transfer claim.				
180611 7/12/2013 WIP	TIME Lawrence B. Linville Preparation ShelconConst.Odenwa	0.90 0.00	275.00 T@1	247.50
LBL review of complaint prepared DEL regarding the Lake Tapps property. Conference with DEL on the issue of whether it is better to file a new lawsuit (UFTA) resolve the Lake Tapps issue under the existing cause number by noting of the application for Writ of Execution.				
180698 7/15/2013 WIP	TIME David E. Linville Preparation ShelconConst.Odenwa	1.50 0.00	250.00 T@1	375.00
Prepare motion to show cause, proposed order and declarations of McDermott and Linville.				
180699 7/15/2013 WIP	TIME David E. Linville Conference ShelconConst.Odenwa	0.30 0.00	250.00 T@1	75.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
Discussion with LBL as to whether new action should be filed or motion to show cause. Review DBM case on this issue.				
180700 TIME	David E. Linville	1.40	250.00	350.00
7/15/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Phone call with client. Review docs in file. Review Uniform Fraudulent Transfer Act.				
180848 TIME	Lawrence B. Linville	0.40	275.00	110.00
7/17/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL readiness of Lake Tapps motion for filling.				
180981 TIME	David E. Linville	1.80	250.00	450.00
7/16/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Finish the motion for show cause order, order, and declarations, review deposition transcript, assemble exhibits to the declarations.				
180979 TIME	David E. Linville	0.30	250.00	75.00
7/17/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Review comments from LBL to draft motion and order to show cause, make changes, submit back to LBL for review.				
181064 TIME	Lawrence B. Linville	0.70	275.00	192.50
8/1/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL/K-2 conferences with Judge Hogan's Court and Commissioner's Office regarding presentation of application for writ of execution on Lake Tapps Property.				
181145 TIME	Lawrence B. Linville	2.20	275.00	605.00
8/8/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL meeting with Kevin Hanchett , potential receiver regarding advisability of filing a motion to appoint receiver to take over Haymond's assets for sale. Conference with opposing counsel, Margaret Archer, regarding same. Call to client regarding same. Research receivership statute. Conference with DEL regarding same. Put together materials for Mr. Hanchett including				

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
South End LLC, Gracy, East End Gun Club Membership, and Lake Tapps residence.				
181241	Lawrence B. Linville	0.30	275.00	82.50
8/15/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL conferences and email exchanges with Shane regarding establishing a global receivership and proceeding on the Lake Tapps Property.				
182539	Lawrence B. Linville	0.80	275.00	220.00
10/11/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL conference with DEL re pursuit of Tapps property. Email Shane regarding same.				
182980	David E. Linville	0.60	250.00	150.00
10/16/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Review and finalize the motion to show cause, proposed order, and declarations of linville and mcdermot in support of the motion, deliver to LBL for review.				
182994	David E. Linville	0.70	250.00	175.00
10/18/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
✓ Review and finalize declarations of LBL and McDermott. Print out documents to attach to their declarations, assemble paperwork. Review pierce county local rules and website re. application for show cause order before court commissioner or ex parte dept.				
183101	Lawrence B. Linville	0.70	275.00	192.50
10/24/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL research C of A case under UFCA, Meridian Place v. Haughney on issue of setting aside Haymond's conveyances of real and personal property interests in Lake Tapps property.				
183109	Lawrence B. Linville	0.40	275.00	110.00
10/28/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email DEL re McDermott's sig and calling first. Then file the Lake Tapps motion to show cause.				

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
183150	11/6/2013	TIME	WIP Get info on McDermotts residence and phone. Phone call, not picking up. Prepare letter to McDermott and mail with declaration, exhibits and return envelope w instructions for him to review sign and return signed decl. calendar follow up.	David E. Linville Correspondence ShelconConst.Odenwa	0.40 0.00	250.00 T@1	100.00
183582	12/13/2013	TIME	WIP Phone call with Rick McDermott. Get updated contact info. Rick to sign the declaration, but making two small changes and mail to this office today. Email to LBL w update.	David E. Linville Correspondence ShelconConst.Odenwa	0.30 0.00	250.00 T@1	75.00
183766	12/20/2013	TIME	WIP LBL conference with client regarding execution on Lake Tapps property. Contact from Richard McDermott regarding purchase of the Haymond residence and membership interest.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.70 0.00	275.00 T@1	192.50
183805	12/31/2013	TIME	WIP LBL travel to Richard McDermott's house for pickup of the declaration.	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.30 0.00	275.00 T@1	357.50
183840	1/7/2014	TIME	WIP LBL meeting with Richard McDermott re execution of the declaration.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.90 0.00	275.00 T@1	247.50
184177	1/15/2014	TIME	WIP LBL receipt/review of McDermott's declaration. Looks good to go. Meet with DEL regarding same.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.60 0.00	275.00 T@1	165.00
184255	1/21/2014	TIME	WIP LBL conferences with Pierce County Superior Court regarding presentation of show cause order	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.60 0.00	275.00 T@1	165.00

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
	to commissioner.			
184308	TIME	3.10	275.00	852.50
1/28/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
Show cause application hearing, commissioners office, Pierce County Superior Court.	ShelconConst.Odenwa			
184320	TIME	3.70	275.00	1017.50
1/29/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
Work on the motion for avoidance of the two transfers. Rewrite the declaration of LBL.	ShelconConst.Odenwa			
184326	TIME	3.80	275.00	1045.00
1/30/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
LBL work on motion to avoid Haymond's transfer of membership interest as voidable transfers pursuant to the Uniform Fraudulent Transfer Act.	ShelconConst.Odenwa			
184335	TIME	2.60	275.00	715.00
1/31/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
LBL work on UFTA motion. Research revocable living trusts for effect on creditors. Serve and file note and motion for the 28th.	ShelconConst.Odenwa			
184341	TIME	1.40	275.00	385.00
2/3/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
Serve and file the order to appear and show cause. Conference with DEL regarding validity of trust. The membership interest can be set aside because it occurred within one year. The transfer of the house may be different. Research S of L issue under UFTA.	ShelconConst.Odenwa			
184758	TIME	2.10	275.00	577.50
2/13/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
Work on the Lake Tapps Motion.	ShelconConst.Odenwa			
184806	TIME	0.20	275.00	55.00
2/19/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
LBL work on Lake Tapps motion, and LBL declaration and proposed orders.	ShelconConst.Odenwa			

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Slip ID	Timekeeper	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Client		Bill Status	
Description	Reference			
184808	Lawrence B. Linville	4.60	275.00	1265.00
2/20/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL complete the motion order and declaration for avoidance of Haymond's two personal property transfers; the house and the membership interest. Serve, file, and provide working copy, (with tabs and highlighter) to Judge Hogan, conference with client. Confirm hearing on the 28th.				
184813	Lawrence B. Linville	0.70	275.00	192.50
2/21/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
File motion to avoid. Serve Haymond and Odenwalder. Call to Margaret re same. Is Margaret interested in the motion? Confirmation of service. Conference with client.				
184819	Lawrence B. Linville	0.40	275.00	110.00
2/21/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL follow up with service on Overland (offices closed locked) and Odenwalder.				
184820	Lawrence B. Linville	0.40	275.00	110.00
2/24/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL receipt of motion from Overland regarding continuance. Contact Overland's office for him to arrange for two week continuance. Confirmation with Andrew and confirmation with all parties.				
184831	Lawrence B. Linville	0.70	275.00	192.50
2/25/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL back and forth with Mr. Overland's office, regarding continuance, call to Judge Hogan's Court (Andrew) regarding scheduling of hearing two weeks out at 9:00 a.m. LBL confirm with Overland. Email to Odelwalder.				
184882	David E. Linville	0.30	250.00	75.00
2/20/2014	Research	0.00	T@1	
WIP	ShelconConst.Odenwa			
Research UFTA re. judgment against transferee. Report results of research to LBL.				

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper Activity	Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
184986	3/5/2014	TIME	WIP LBL email Margaret regarding the upcoming show cause hearing on 3.14.14 and suggestion of participation.	Lawrence B. Linville Preparation	ShelconConst.Odenwa	0.40 0.00	275.00 T@1	110.00
185030	3/6/2014	TIME	WIP LBL email from Margaret. Margaret is going to ask Anchor Bank for authority to support Shelcon's motion to set aside transfers of property. Hearing is on 3.14.14.	Lawrence B. Linville Preparation	ShelconConst.Odenwa	0.20 0.00	275.00 T@1	55.00
185052	3/12/2014	TIME	WIP Receipt of opposition to motion to set aside transfers. Prepare for the hearing. Draft response. Hope there is time to get it to Judge Hogan.	Lawrence B. Linville Preparation	ShelconConst.Odenwa	3.90 0.00	275.00 T@1	1072.50
185124	3/13/2014	TIME	WIP X LBL receipt of responses submitted by Mr. Bardwil on behalf of Ms. Odenwalder and the trust, and responses from Mr. Overland on behalf of Scott Haymond. LBL preparation of responses as submittal to the court together with the copies to opposing counsel. Revised proposed order to encompass latest submissions.	Lawrence B. Linville Preparation	ShelconConst.Odenwa	4.70 0.00	275.00 T@1	1292.50
185129	3/14/2014	TIME	WIP LBL preparation for 9 am motion, Judge Hogan's Court. Travel to court. Pre hearing conference with client. Present the motion. Complete the hearing. Post hearing conference with client. Return to office. Contact Berkshire Hathaway (Ginny) regarding listing of Lake Tapps property. Assemble materials necessary to prepare motion for appointment of receiver pursuant to RCW 19.40.081.	Lawrence B. Linville Preparation	ShelconConst.Odenwa	5.30 0.00	275.00 T@1	1457.50

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185308	3/18/2014	TIME	WIP Preparation filing and service of lis pendens.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.60 0.00	275.00 T@1	165.00
185313	3/19/2014	TIME	WIP LBL meeting with Tracie Hess, proposed real estate agent to be appointed the receiver. Take down information. Take down declaration in support of receiver.	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.90 0.00	275.00 T@1	522.50
185318	3/20/2014	TIME	WIP LBL research requirement for receivership bond.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.20 0.00	275.00 T@1	55.00
185331	3/21/2014	TIME	WIP X <u>Work on receivership complaint and motion to appoint.</u>	Lawrence B. Linville Preparation ShelconConst.Odenwa	3.70 0.00	275.00 T@1	1017.50
185336	3/24/2014	TIME	WIP X <u>LBL receipt of both Odenwalder's motion for reconsideration and Haymond's motion for reconsideration. LBL work on responses together with receivership motion.</u>	Lawrence B. Linville Preparation ShelconConst.Odenwa	4.10 0.00	275.00 T@1	1127.50
185340	3/25/2014	TIME	WIP LBL complete responses to both Darra M. Odenwalder and Scott Haymond's motion for reconsideration. Hold off filing with the court until required deadline. Email exchange with Judge Hogan's courtroom regarding scheduling oral argument. Tabb's for Judge Hogan's working copy. Yellow highlighter on points to emphasize. Review and edit everything before service and filing.	Lawrence B. Linville Prep Pleadings ShelconConst.Odenwa	3.10 0.00	275.00 T@1	852.50
185349	3/27/2014	TIME	WIP Work on execution on Lake Tapps. Response to	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.60 0.00	275.00 T@1	165.00

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			Haymond and Odelwalder motion for reconsideration.				
185359	TIME			Lawrence B. Linville	0.40	275.00	110.00
	3/28/2014			Preparation	0.00	T@1	
	WIP			ShelconConst.Odenwa			
			LBL email to Tracie regarding getting hooked up with McDermott. Property is to be sold as a unit, land and house together.				
185400	TIME			Lawrence B. Linville	2.30	275.00	632.50
	4/3/2014			Preparation	0.00	T@1	
	WIP			ShelconConst.Odenwa			
			LBL research River Home Development, v. Integras Architecture at 167 Wa app 221 and Wilcox v. Lexington Eye Institute at 130 Wa app 234 for the point that neither Haymond nor Odenwalder should be allowed to raise new facts or theories on a CR 59 motion for reconsideration. LBL supplement Shelcon's responses to Odenwalder's and Haymond's motion for reconsideration.				
185405	TIME			Lawrence B. Linville	1.30	275.00	357.50
	4/4/2014			Preparation	0.00	T@1	
	WIP			ShelconConst.Odenwa			
			LBL preparation of response to motions for reconsideration (2).				
185660	TIME			David E. Linville	0.40	250.00	100.00
	3/19/2014			Research	0.00	T@1	
	WIP			ShelconConst.Odenwa			
			Research receivership statutes, research pierce county auditor office website re, judgments against Haymond				
185661	TIME			David E. Linville	0.30	250.00	75.00
	3/19/2014			Preparation	0.00	T@1	
	WIP			ShelconConst.Odenwa			
			Prepare memo to LBL re. pros/cons of receivership for the Lake Tapps house.				
185662	TIME			David E. Linville	0.20	250.00	50.00
	3/19/2014			Meeting	0.00	T@1	
	WIP			ShelconConst.Odenwa			
			Meeting with LBL re. re. pros/cons of receivership for the Lake Tapps house, whether Shelcon must share proceeds with other creditors.				

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185663	TIME		3/19/2014 WIP Research WA law and pierce county auditor office website re. whether Shelcon has priority over the other judgment creditors.	David E. Linville Research ShelconConst.Odenwa	0.30 0.00	250.00 T@1	75.00
185664	TIME		3/19/2014 WIP Prepare memo to LBL re. whether Shelcon has priority over the other judgment creditors.	David E. Linville Preparation ShelconConst.Odenwa	0.30 0.00	250.00 T@1	75.00
185683	TIME		3/24/2014 WIP Review the Gun Club bylaws. Review SOS profile, non-profit corp. Phone call to Rick McDermott to discuss sale of Haymonds house, whether Club approval required and procedure for sale.	David E. Linville General ShelconConst.Odenwa	0.50 0.00	250.00 T@1	125.00
X 185685	TIME		3/24/2014 WIP Research receivership statutes. Determine whether custodial receivership or general receivership more appropriate for sale of Haymonds Lake Tapps house. Research execution of judgment on personal and real property. Research WA law on charging orders. Research law on whether the structure is personal or real property. Research whether receivership is even necessary. Take notes on receivership statutes.	David E. Linville Research ShelconConst.Odenwa	1.40 0.00	250.00 T@1	350.00
185686	TIME		3/24/2014 WIP Consult with LBL re. obtaining the Club bylaws, SH agreement, advisability of charging order/execution vs. receivership, whether structure is real or personal property, whether receiver should be general or custodial.	David E. Linville Meeting ShelconConst.Odenwa	0.20 0.00	250.00 T@1	50.00
185698	TIME		3/25/2014 WIP	David E. Linville Review ShelconConst.Odenwa	0.50 0.00	250.00 T@1	125.00

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		Review draft motion and declaration and order for appointment of receiver. Review RCW 7.60 and pleadings in Anchors receivership proceeding, memo to LBL that complaint w filing fee must be filed and advise to hold off until after the m. for reconsid. hearing occurs on 4/11, before initiating the action.			
185699	TIME	David E. Linville General ShelconConst.Odenwa	0.10 0.00	250.00 T@1	25.00
		3/25/2014 WIP Confer w assistant re. whether 4/11 hearing will be w or w/out oral argument, review email from judges assistant on this issue.			
186534	TIME	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.70 0.00	275.00 T@1	467.50
		8/13/2014 WIP LBL revisions to motion to appoint receiver, declaration of Theresa. Email Theresa re contact with McDermott. Contact McDermott re contact with Theresa.			
186722	TIME	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.10 0.00	275.00 T@1	302.50
		6/17/2014 WIP LBL conference with Tracy Hess re motion for appointment general receiver. Conference with DEL re filing of lis pendens in lieu of motion for receivership.			
186728	TIME	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.40 0.00	275.00 T@1	110.00
		6/16/2014 WIP LBL memo to DEL re necessity to file independent action in order to commence receivership or rather the receivership can be commenced upon filing a motion in Pierce County Superior Court per appointment of receiver, using the original cause number on file.			
186753	TIME	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.60 0.00	275.00 T@1	165.00
		6/20/2014 WIP LBL email to Shane re where we are on the Lake Tapps receivership.			

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186764	TIME		6/25/2014 WIP LBL email from Tingvall, attorney for John L. Scott re Tracy serving as receiver. Memo to DEL re same.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.60 0.00	275.00 T@1	165.00
186782	TIME		8/30/2014 WIP LBL conference with Shawn Hicks re enforcement proceedings against lake Tapps Property. LBL conference with client re same. Not so sure about the receivership. Might be better to attach and execute upon the personal property, advertise, obtain court approval for sale. In this way, if the house is purchased for less than its true fair market value, Shane will benefit.	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.10 0.00	275.00 T@1	302.50
186789	TIME		7/1/2014 WIP Prepare a motion and order for writ of execution pursuant to RCW 6.17 and 6.21. The plan will be to get the writ of execution entered by the court, deliver a praecipe to the clerk's office and put the membership interest and house (both items of personal property) up for sale through the Sheriff's Office. Then, at the sale, acquire the house by bidding in all or some of the judgment.	Lawrence B. Linville Preparation ShelconConst.Odenwa	2.20 0.00	275.00 T@1	605.00
186796	TIME		7/2/2014 WIP LBL figure out this whole thing on execution under RCW ch. 6.17 and RCW 6.21, the praecipe and the writ of execution. Prepare the appropriate motion. So many options. So many different ways of pursuing the collection on the personal property. Trying to figure out the best one.	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.80 0.00	275.00 T@1	495.00
187068	TIME		7/14/2014 WIP Meeting with Shane in the office re. collection, Lake Tapps, receiver, rental properties Scott collecting on in LLCs names, involuntary bankruptcy, sheriff's sale options.	David E. Linville General ShelconConst.Odenwa	2.60 0.00	250.00 T@1	650.00

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Description	Reference			
187089	David E. Linville	0.80	250.00	200.00
7/14/2014	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare and record lis pendens in pierce county on Haymonds Lake Tapps property.				
187092	Lawrence B. Linville	1.30	275.00	357.50
7/14/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL meeting with client re whether or not to move forward on the Lake Tapps property, how to secure Shelcon's position on title.				
189217	Lawrence B. Linville	0.20	275.00	55.00
2/2/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Receipt of First American's emails to SM regarding East End Lake Tapps Gun Club.				
189218	Lawrence B. Linville	0.40	275.00	110.00
2/13/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Go through Darra Haymond and the brother in West Seattle in order to get contact information for Darra to whom Haymond conveyed the property.				
189237	Lawrence B. Linville	0.40	275.00	110.00
2/28/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Conference with opposing counsel, Allen Overland, regarding deposition of Haymond. Haymond is now in lockdown. No work release any more.				
195816	Lawrence B. Linville	0.60	275.00	165.00
8/1/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Notice of deposition and subpoena duces tecum to Pierce County treasurers Office regarding payment checks on the Lake Tapps property for personal property taxes paid by either Darra or Scott Haymond.				
195817	Lawrence B. Linville	0.90	275.00	247.50
8/7/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Work on the Lake Tapps motion/application for writ of execution. All is personal property.				

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Description	Reference			
195818	Lawrence B. Linville	0.50	275.00	137.50
8/8/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Organize and write out wwhat do we need to do to execute upon Lake Tapps.				
195819	Lawrence B. Linville	0.20	275.00	55.00
8/9/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
* Call to Rick McDermott regarding the Lake Tapps property.				
195820	Lawrence B. Linville	0.60	275.00	165.00
8/13/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL follow up with Rick McDermott on the Lake Tapps property. Rick is working on his declaration. Needs to get information from other persons on the Board at Lake Tapps. Some of this information is dated.				
195821	Lawrence B. Linville	0.80	275.00	220.00
8/14/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Work with McDermott on the Lake Tapps property. Property is on a well system. No water or sewer payments.				
195823	Lawrence B. Linville	0.40	275.00	110.00
8/17/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Follow up with Rick McDermott regarding declaration on Lake Tapps. Personal property tax issues from Pierce County Treasurers office. Lake Tapps property is on well service.				
195825	Lawrence B. Linville	0.20	275.00	55.00
8/23/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Work on writ of execution based on McDermott's Declaration (Lake Tapps).				
195826	Lawrence B. Linville	0.30	275.00	82.50
8/24/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Conference with Darra in preparation for deposition.				

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Description	Reference			
195827	Lawrence B. Linville	0.40	275.00	110.00
8/27/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare for deposition of Darra Haymond regarding Lake Tapps property.				
195828	Lawrence B. Linville	0.50	275.00	137.50
8/29/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Receipt of Pierce County Assessor's printout of payor's personal property taxes on the Lake Tapps property. Follow up with McDermott regarding declaration.				
195829	Lawrence B. Linville	0.40	275.00	110.00
9/11/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Meeting with client regarding Lake Tapps property.				
195830	Lawrence B. Linville	0.40	275.00	110.00
9/14/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Conference with client, Shane Martin regarding ordering deposition of Darra Odenwalder regarding motion on the Lake Tapps property.				
195831	Lawrence B. Linville	2.00	275.00	550.00
9/19/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL work on the Lake Tapps motion. We have McDermott's affidavit. Would like Odenwalder's deposition. Call to Shane regarding same.				
195833	Lawrence B. Linville	0.80	275.00	220.00
9/25/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Conference with client.				
195834	Lawrence B. Linville	0.30	275.00	82.50
9/26/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Order deposition of Darra Odenwalder in preparation for the Lake Tapps property.				
195835	Lawrence B. Linville	0.10	275.00	27.50
10/2/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Call court reporter and confirm available and				

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Description	Reference			
				delivery of Odenwalder deposition.
195837	TIME	0.70	275.00	192.50
10/4/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
				LBL receipt of Darra Odenwalder's deposition. Revise motion on Lake Tapps property. Readiness for service and filing.
195838	TIME	1.70	275.00	467.50
10/8/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
				Apply yellow highlighter to portions of Odenwalder's deposition regarding application for execution on Lake Tapps property. Search for listing agent on Lake Tapps property. Email to Richard McDermott regarding same.
195839	TIME	3.00	275.00	825.00
10/10/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
				Research statements of law regarding third party beneficiaries, incidental beneficiaries, Lake Tapps motion. Emails from and to McDermott regarding Lake Tapps motion, public listing, name of realtor.
195840	TIME	3.20	275.00	880.00
10/11/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
				Preparation of Lake Tapps motion, research on revocable living trusts serving as a shield against creditors, IRC 743 grantor trusts, incorporate Darra Odenwalder's deposition in the motion, work on exhibits, copies of the restatements.
195844	TIME	0.70	275.00	192.50
11/21/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
				Prepare proposed orders (2) on Lake Tapps motion. Email Shane regarding status.
195845	TIME	1.00	275.00	275.00
11/22/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
				Revise motion based upon yesterday's receipt of correction sheet to Darra Odenwalders deposition. Revise proposed order(s) on execution on Lake Tapps.

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195846	TIME	2.60	275.00	715.00
3/17/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
LBL completion of motion to appoint receiver, draft declaration of Tracie Hess, complete the order appointing general receiver, contact Tracie Hess, set up interview. Draft Hess declaration pursuant to RCW 7.60.035.				
195847	TIME	2.70	275.00	742.50
3/28/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
X LBL work on responses to motions for reconsideration, prepare the tabs, TM filing and service. Cc to client for review.				
195850	TIME	0.30	275.00	82.50
10/8/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
Draft order on public sale of Lake Tapps property as opposed to sheriffs auction.				
195851	TIME	0.20	275.00	55.00
5/16/2014	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
LBL conference with client regarding attachment of Lake Tapps House.				
195926	TIME	0.60	275.00	165.00
6/29/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
LBL calls to Tim McDermitt, president of Lake Tapps Gun Club regarding workings and nature of Haymond's property ownership. Need to schedule a deposition.				
195927	TIME	0.40	275.00	110.00
7/13/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
Conference with McDermott regarding background on Lake Tapps property. What is the difference between Darra and Koryann? Are they the same person?				
195928	TIME	1.60	275.00	440.00
7/27/2012	Lawrence B. Linville	0.00	T@1	
WIP	Preparation			
	ShelconConst.Odenwa			
Conference with Shane. Work on the application				

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Attempts to reach witnesses, dial in on the issues returned by Court of Appeals in preparation for the October hearing.				
203220	Lawrence B. Linville	2.80	285.00	798.00
9/18/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL work on the decision and preparation for the evidentiary hearing on the 3rd.				
203227	Lawrence B. Linville	2.40	285.00	684.00
9/19/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL meeting with Richard. Preparation for the evidentiary hearing on October 03, 2016.				
203233	Lawrence B. Linville	1.90	285.00	541.50
9/20/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL receipt of all the bylaws going back forever. Review of same. Outline. Prepare draft of proposed Findings of Fact/Conclusion of Law and trial brief.				
203235	Lawrence B. Linville	3.60	285.00	1026.00
9/21/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
X	LBL work on the brief, exhibits, Findings of Facts, Conclusions of Law. Notice from the court regarding due date on trial briefs.			
203241	Lawrence B. Linville	4.90	285.00	1396.50
9/23/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
X	LBL work on trial brief and meeting with witnesses.			
203244	Lawrence B. Linville	2.10	285.00	598.50
9/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL preparation for evidentiary hearing, assembly of exhibits, prepare for meeting with McDermott, primary witness. Revisit the UFTA SOL issue. Washington Practice. Claimant receives benefit of the longer of the 1 or 4 year statutes.				
203245	Lawrence B. Linville	3.70	285.00	1054.50
9/25/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			

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203246	Lawrence B. Linville	4.70	285.00	1339.50
9/26/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL work on the trial brief. First draft. There are two sets of bylaws that are applicable. There are the 1997 bylaws that apply to the 2006 transfer of membership interest and dwelling. Plus, there are the 2009 bylaws that apply to Haymond's 2012 transfer of membership interest and dwelling. How to keep straight in the trial brief without burdening the court. LBL to place yellow highlighter on relevant exhibits for the court. Notification from the court that trial briefs are due on Wednesday.				
X				
LBL second and third draft of trial brief, meeting with Richard McDermott regarding accuracy of everything stated in the trial brief. Everything stated in the trial brief must be consistent with the testimony (including answers for cross examination) by Richard McDermott at the time of trial. LBL draft proposed Findings of Fact and Conclusions of Law in case requested by the Court. LBL legal research on issue of evidentiary hearing requiring admissibility of exhibits. New exhibits admitted by declaration need to be identified.				
203247	Lawrence B. Linville	4.20	285.00	1197.00
9/27/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Complete the trial brief with edits and modifications following previous evenings meeting with witnesses. Mr. McDermott to try his best to get copies of the boards minutes for February and March of 2012. Meet with Mr. McDermott and review the trial brief, make sure all statements are correct, true, accurate, not over stated, not under stated. Meeting in Normandy Park at Starbucks.				
X				
203257	Lawrence B. Linville	3.80	285.00	1083.00
9/28/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Finalize the trial brief that is due today, assemble the exhibits, mark and tab the exhibits, serve Overland and Bardwell, file with the court, conference with Andrew regarding delivering the judges working copy tomorrow. Approval from				

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Andrew. Meeting with Richard regarding past minutes of the board. Are they helpful? Review of same.				
203265	Lawrence B. Linville	1.80	285.00	513.00
9/29/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL preparation for the evidentiary hearing. Meeting with witnesses. Primary witness will be Richard McDermott. Secondary witness Nancy Thorp may be cumulative. Need to decide whether or not to call at the time of trial. Check the court file to determine if Bardwill or Overland have filed trial briefs yet and the answer is no. Draft questions for Haymond, Odenwalder on cross examination.				
203275	Lawrence B. Linville	2.40	285.00	684.00
9/30/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Meeting with Richard McDermott in preparation for Monday's evidentiary hearing.				
203280	Lawrence B. Linville	10.80	285.00	3078.00
10/3/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Evidentiary hearing, Pierce County Superior Court, Judge Hogan. Pre-hearing meeting with witnesses, Nancy Thorp, Richard McDermott. Preparation for the evidentiary hearing. Conclude the hearing including closing arguments. Post hearing review with Thorp and McDermott. Judge Hogan has taken the matter under advisement. Return to office.				
203598	Lawrence B. Linville	0.40	285.00	114.00
10/4/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Disassemble trial materials, prepare an exhibit binder for the exhibit's that were actually admitted at the evidentiary hearing.				
203739	Lawrence B. Linville	1.20	285.00	342.00
10/8/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Research <i>Greive v. March</i> 54 WA.2d 365 (1959) and <i>Mickelson v. Williams</i> 50 WA.2d 402 (1957) on the issues of attachment. Got an				

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204119	Lawrence B. Linville	0.10	285.00	28.50
10/18/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Note from Thorp re decision.				
204126	Lawrence B. Linville	0.20	285.00	57.00
10/19/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL/KW follow up on completion of transcripts. 12/02/2016 is approaching.				
204130	Lawrence B. Linville	0.40	285.00	114.00
10/20/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email exchange with McDermott. No share certificates are issued. Memberships carried on Club's books pretty informal. Email David re same.				
204137	Lawrence B. Linville	0.80	285.00	228.00
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare motion for attorney's fees.				
204138	Lawrence B. Linville	1.20	285.00	342.00
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Briefing on Lodestar.				
204139	Lawrence B. Linville	0.70	285.00	199.50
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Draft proposed FOF/COL/JMT re attorney fees/costs.				
204140	Lawrence B. Linville	0.80	285.00	228.00
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Work with DEL on App/Writ of attachment.				
204141	Lawrence B. Linville	1.70	285.00	484.50
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Filing deadline is 11/18/2016. Verify each time entry for which fees/costs are requested.				

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204142	Lawrence B. Linville	1.10	285.00	313.50
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Redraft, edit FOF/COL on court's decision.				
204143	Lawrence B. Linville	1.40	285.00	399.00
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Receipt of both transcripts (court's decision and testimony). Begin review and make notes re preparation of FOF.				
204144	Lawrence B. Linville	0.40	285.00	114.00
10/24/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email exchanges with bookkeeper re accuracy and completeness and chronological sequencing of time/lost entries.				
204156	Lawrence B. Linville	2.10	285.00	598.50
10/26/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Read and note the trial transcripts of Thorp/McDermott testimony for substantial evidence to support proposed FOF/COL. Redraft FOF/COL accordingly.				
X 204166	Lawrence B. Linville	3.70	285.00	1054.50
10/28/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Revise FOF/COL/Order following 2nd/3rd study of transcripts of hearing. Cite to the transcript.				
204167	Lawrence B. Linville	0.40	285.00	114.00
10/28/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare the Notice of Presentation.				
204168	Lawrence B. Linville	1.60	285.00	456.00
10/28/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Work on Motion, Declaration and FOF/COL/Judgment for attorney fees.				
204169	Lawrence B. Linville	0.20	285.00	57.00
10/28/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare (w/DEL) App and Writ of Garnishment.				

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		Description			
		Maybe apt of receiver.			
204170	TIME	Lawrence B. Linville General ShelconConst.Odenwa	0.20 0.00	285.00 T@1	57.00
		10/31/2016 WIP Draft email to Andrew. Email re highlighter.			
204171	TIME	Lawrence B. Linville General ShelconConst.Odenwa	1.40 0.00	285.00 T@1	399.00
		10/31/2016 WIP X Work on attorney fees/costs motion.			
204172	TIME	Lawrence B. Linville General ShelconConst.Odenwa	0.90 0.00	285.00 T@1	256.50
		10/31/2016 WIP Mahler, Progressive Animal Welfare and Seattle Housing Authority case research. Mahler covers it all.			
204173	TIME	Lawrence B. Linville General ShelconConst.Odenwa	0.60 0.00	285.00 T@1	171.00
		10/31/2016 WIP Work on LBL Declaration.			
204174	TIME	Lawrence B. Linville General ShelconConst.Odenwa	0.50 0.00	285.00 T@1	142.50
		10/31/2016 WIP Work w/DEL on Garnishment v. receivership.			
204180	TIME	Lawrence B. Linville General ShelconConst.Odenwa	1.90 0.00	285.00 T@1	541.50
		11/1/2016 WIP Work on Motion/Declaration/Order, judgment summary re attorney fees and costs. Input from DEL re assignment/unsatisfied judgment.			
204181	TIME	Lawrence B. Linville General ShelconConst.Odenwa	1.40 0.00	285.00 T@1	399.00
		11/1/2016 WIP Edit and amend FOF/COL per David's input.			
204182	TIME	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.40 0.00	275.00 T@1	110.00
		1/9/2012 WIP Predeposition meeting and conference with Shane.			

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204183	1/9/2012	TIME	WIP Suppl. examinatio of Scott Haymond in Tacoma.	Lawrence B. Linville Preparation ShelconConst.Odenwa	3.60 0.00	275.00 T@1	990.00
204184	1/9/2012	TIME	WIP Post suppl exam. wrap up with opposing counsel.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.30 0.00	275.00 T@1	82.50
204185	2/2/2012	TIME	WIP Check web site.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.40 0.00	275.00 T@1	110.00
204186	2/2/2012	TIME	WIP Check Secretary of State's office, nonprofit corporation.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.30 0.00	275.00 T@1	82.50
204187	2/7/2012	TIME	WIP Put together all of the information on the East End Lake Tapp's Gun Club, nature of Haymond's interest.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.30 0.00	275.00 T@1	82.50
204188	2/7/2012	TIME	WIP Memo to LWA regarding preparation or Writ of Attachment or Charging Order. Either way I want to obtain judicial transfer of Haymond's membership interest to Shelcon.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.20 0.00	275.00 T@1	55.00
204189	2/10/2012	TIME	WIP Review file. Review notes, emails documents provided by title company related to bills of sale for personal property located on gun club's land. Review gun club website. Review secretary of state website re corporate registration. Review Pierce County Assessor website re parcel ownership. Review complaint filed by gun club in 2008. Review pierce county auditor's website re recorded documents related to property. Discuss	Lars W. Anderson Preparation ShelconConst.Odenwa	1.50 0.00	220.00 T@1	330.00

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Description		Reference			
204196	TIME	Lawrence B. Linville	3.20	285.00	912.00
11/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Work with Kristen and David in harmonizing the FOF/COL and order with the Writ of Garnishment. Draft an amended Writ and Answer. Add findings re assignment, add COL re broad authority of Board over the Club's business, including the transfer of memberships and admitting new members.					
204197	TIME	Lawrence B. Linville	0.40	285.00	114.00
11/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Go back through cost bill and invoices and eliminate nontaxable costs.					
204198	TIME	Lawrence B. Linville	0.30	285.00	85.50
11/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Prepare explanatory letter to Andrew re transcript citations.					
204199	TIME	Lawrence B. Linville	0.30	285.00	85.50
11/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Prepare explanatory letter to Andrew re transcript citations.					
204200	TIME	Lawrence B. Linville	0.40	285.00	114.00
11/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Measure proportion of Odenwalder's deposition as taxable cost.					
204201	TIME	Lawrence B. Linville	0.40	285.00	114.00
11/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Measure proportion of Odenwalder's deposition as taxable cost.					
204202	TIME	Lawrence B. Linville	0.40	285.00	114.00
11/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Revise the Writ of Garnishment to include judgment for attorney's fees and taxable costs.					

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204203	Lawrence B. Linville	0.30	285.00	85.50
11/4/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Contact Thorp/McDermott to determine if an entity as opposed to a natural person can hold a membership in the club. Will need to so state answer to Writ of Garnishment, research Bylaws.				
204204	Lawrence B. Linville	0.40	285.00	114.00
11/4/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Revise/edit LBL declaration for more accurate calculation of taxable costs.				
204205	Lawrence B. Linville	0.40	285.00	114.00
11/4/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Work with David re brief on attorney fees. Research. Drafting (initial).				
204215	Lawrence B. Linville	0.30	275.00	82.50
6/26/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare notice of deposition.				
204216	Lawrence B. Linville	0.10	275.00	27.50
6/26/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Shane to drive out there with a friend and will serve McDermitt. Preparation of subpoena duces tecum.				
204217	Lawrence B. Linville	0.30	275.00	82.50
6/26/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Identify all of the documents we want McDermitt to bring to the deposition. Schedule the deposition with Overland.				
204218	Lawrence B. Linville	1.70	275.00	467.50
6/26/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Place would be Overland's office. LBL preparation for writ of execution hearing this Friday.				

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204219	TIME	Lawrence B. Linville	0.20	275.00	55.00
7/2/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Call from Pierce County Superior Court (Mike) Clerk's Office regarding \$20 filing fee (writ of execution) and filing of Praecipe.					
204220	TIME	Lawrence B. Linville	0.20	275.00	55.00
7/2/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Notice of deposition to McDermitt (Lake Tapps).					
204222	TIME	Lawrence B. Linville	1.70	275.00	467.50
7/15/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Go through the trust document. Who is Darra? Is it really his sister?					
204223	TIME	Lawrence B. Linville	0.40	275.00	110.00
7/15/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Go back through notes taken from conversations with McDermott.					
204224	TIME	Lawrence B. Linville	2.50	275.00	687.50
7/15/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
On the Keyport property, do not see any benefit in setting aside transfer as fraudulent. But, that is likely what needs to be done on the Lake Tapps property. Transfer was recent to sister according to McDermott. No consideration. The Keyport property is upside down but the Lake Tapps property is free and clear. Prepare application for Writ of Execution/application for Writ of Attachment. Writ of execution likely more appropriate. Actually want to sell the property because there is equity in the property. Looks like Writ of Attachment is more appropriate for the Key Port property because Haymond has no equity in the property. Same thing for the Seattle property 18th Ave SW. Have already recorded judgment in King County.					

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204225	TIME	Lawrence B. Linville	0.10	275.00	27.50
7/16/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Arrange predeposition meeting with McDermott.					
204226	TIME	Lawrence B. Linville	0.20	275.00	55.00
7/16/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Notify opposing counsel, Allen Overland.					
204227	TIME	Lawrence B. Linville	0.30	275.00	82.50
7/16/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Assemble exhibits to both Applications for Execution.					
204228	TIME	Lawrence B. Linville	0.60	275.00	165.00
7/17/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Preparation for McDermott's meeting/deposition.					
204229	TIME	Lawrence B. Linville	0.40	275.00	110.00
7/17/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Conference with client.					
204230	TIME	Lawrence B. Linville	0.80	275.00	220.00
7/18/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Draft out application for writ of execution.					
204231	TIME	Lawrence B. Linville	0.30	275.00	82.50
7/18/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Conference with client.					
204232	TIME	Lawrence B. Linville	0.10	275.00	27.50
7/18/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Cancel deposition of McDermott.					
204233	TIME	Lawrence B. Linville	0.10	275.00	27.50
7/18/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Notify court reporter. Notify Overland.					

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204234	7/23/2012	TIME	WIP Declaration of McDermott.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.70 0.00	275.00 T@1	192.50
204235	7/25/2012	TIME	WIP Forward declaration to Rick McDermott for completion and return.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.10 0.00	275.00 T@1	27.50
204236	7/28/2012	TIME	WIP Serve Joseph Pakstor LLC with notice of deposition.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.10 0.00	275.00 T@1	27.50
204237	8/3/2012	TIME	WIP Follow up with Rick McDermott regarding preparation/completion of declaration.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.30 0.00	275.00 T@1	82.50
204238	8/21/2012	TIME	WIP Response to motion to quash. Attach exhibits. File with the court.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.90 0.00	275.00 T@1	247.50
204239	8/21/2012	TIME	WIP Confirm receipt of writ of execution and establishment with Judge Johnson's court, opposing counsel.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.70 0.00	275.00 T@1	192.50
204240	8/21/2012	TIME	WIP Call to Judge Johnson's court regarding confirmation of calendar hearing on September 7.	Lawrence B. Linville Preparation ShelconConst.Odenwa	0.20 0.00	275.00 T@1	55.00
204241	10/9/2012	TIME	WIP Memo to DEL regarding liability of transferee. Recent case in Washington on point. If Haymond did file for bankruptcy, the Lake Tapps property	Lawrence B. Linville Preparation ShelconConst.Odenwa	1.60 0.00	275.00 T@1	440.00

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204248	Lawrence B. Linville	0.80	275.00	220.00
2/12/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Go through the 21st Mortgage materials on summary foreclosures against Chattel property. Redraft the Lake Tapps motion accordingly. Rather than seek approval for a writ of execution which would likely require posting of a bond with the sheriffs office, it would be better to summarily foreclose under the applicable statute. Conference with Shane regarding same.				
204249	Lawrence B. Linville	0.40	275.00	110.00
2/18/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Decision will be read on Wednesday. Research the 6/28/06 conveyance from Haymond to the 14224 Pioneer Living Trust.				
204250	David E. Linville	1.20	250.00	300.00
7/15/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Draft summons and complaint.				
204251	Lawrence B. Linville	0.40	275.00	110.00
7/17/2013	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Will be handled on the show cause calendar. Conference with DEL regarding whether to note the Shelcon,s motion before Judge Hogan or before a commissioner. Generally it is done before a commissioner.				
204252	Lawrence B. Linville	0.20	275.00	55.00
1/28/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Order to appear and show cause signed. Reschedule the date with judge Hogan's Judicial Assistant, Andrew, will be on the 28th.				
204253	Lawrence B. Linville	0.40	275.00	110.00
1/28/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Serve and file the order to appear and show cause and note for motion, confirm with Andrew.				

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204254	Lawrence B. Linville	1.10	275.00	302.50
1/28/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Edit and revise both the motion to avoid transfer of Haymond's property to living trust pursuant to RCW ch 19.40.				
204255	Lawrence B. Linville	0.20	275.00	55.00
1/28/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Revise and edit declaration of LBL.				
204256	Lawrence B. Linville	0.20	275.00	55.00
1/28/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
LBL preparation of proposed order.				
204257	Lawrence B. Linville	0.10	275.00	27.50
1/28/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email Margaret re same.				
204259	Lawrence B. Linville	0.50	275.00	137.50
3/18/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Complete the receivership motion.				
204260	Lawrence B. Linville	1.00	275.00	275.00
3/18/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Draft preliminary affidavit of Tracie Hess. Note seven day notice requirement. Calls from Tracie Hess regarding property evaluation.				
204261	Lawrence B. Linville	0.80	275.00	220.00
3/19/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Review of outstanding judgments. Check Washington practice regarding priority of judgments.				
204262	Lawrence B. Linville	0.90	275.00	247.50
3/19/2014	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email supplemental information to Tracie: declaration of McDermott, bylaws of the gun club and contact information for McDermott.				

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Description		Reference			
204263	TIME	Lawrence B. Linville	0.30	275.00	82.50
3/20/2014		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Same for lis pendens. Can we record a lis pendens against personal property? Memo to David re same.					
204264	TIME	Lawrence B. Linville	0.20	275.00	55.00
3/20/2014		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Check on homestead exemption, does it apply to real property only?					
204265	TIME	Lawrence B. Linville	0.30	275.00	82.50
3/21/2014		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Notification to the club regarding Pierce County Superior Court decision.					
204266	TIME	Lawrence B. Linville	0.70	275.00	192.50
3/21/2014		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Email exchanges with Tracie Hess, prospective receiver. .					
204267	TIME	Lawrence B. Linville	0.70	275.00	192.50
2/28/2013		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Research with DEL on whether the Lake Tapps house is personal property or real property. It is taxed as personal property because the land is owned separately from the house. The Lake Tapps East End Rod & Gun Club own the land. The house is owned by Darra Odenwalder. Does that make a difference? Can we still execute without a bond?					
204268	TIME	Lawrence B. Linville	0.60	275.00	165.00
8/7/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Research the A & W Farm case on fraudulent transfers.					
204269	TIME	Lawrence B. Linville	0.50	275.00	137.50
8/8/2012		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Follow up with McDermitt on Lake Tapps.					

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Description	Reference			
204270	Lawrence B. Linville	0.80	275.00	220.00
8/13/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Follow up with PSE, Bonnie Lake, and Tapps regarding power, water, sewer and electricity payment on the Lake Tapps property. Whose been making the payments. Turns out property is on a well system. Follow up with DCL regarding same. This will all show the attributes of true beneficial property ownership (occupancy).				
204271	Lawrence B. Linville	0.80	275.00	165.00
8/13/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Conference with client regarding same.				
204272	Lawrence B. Linville	0.40	275.00	110.00
8/17/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Notice of deposition duces tecum to PSE (Denika).				
204273	Lawrence B. Linville	0.80	275.00	220.00
8/23/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare for Darras deposition.				
204274	Lawrence B. Linville	0.30	275.00	82.50
8/27/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Meeting with Shane.				
204275	Lawrence B. Linville	0.20	275.00	55.00
8/27/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Revise writ of execution on Lake Tapps property based on Darra's deposition.				
204276	Lawrence B. Linville	3.30	275.00	907.50
9/11/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Deposition of Darra Odenwalder.				
204277	Lawrence B. Linville	0.20	275.00	55.00
11/22/2012	Preparation	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email Shane.				

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Description		Reference			
204278	TIME	Lawrence B. Linville	0.70	275.00	192.50
3/26/2014		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
LBL conference with Andrew in Judge Hogan's court regarding scheduling of oral argument, if any.					
204279	TIME	Lawrence B. Linville	0.30	275.00	82.50
3/26/2014		Preparation	0.00	T@1	
WIP		ShelconConst.Odenwa			
Conference with David regarding same.					
204280	TIME	Lawrence B. Linville	0.30	285.00	85.50
9/30/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Receipt and review of additional Board materials that might be helpful.					
204281	TIME	Lawrence B. Linville	0.90	285.00	256.50
9/30/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
LBL receipt of Odenwalder trial brief together with attachments. Study and prepare cross examination of Odenwalder.					
204282	TIME	Lawrence B. Linville	0.30	285.00	85.50
9/30/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Prepare questions for Haymond, should Haymond testify.					
204283	TIME	Lawrence B. Linville	0.60	285.00	171.00
10/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Draft the application and writ of attachment in the event that the court rules in favor of Shelcon.					
204284	TIME	Lawrence B. Linville	0.10	285.00	28.50
10/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Check the 7 or 10 day automatic stay on judgments entered by trial courts.					
204285	TIME	Lawrence B. Linville	0.30	285.00	85.50
10/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Research Washington Practice on how to describe the property to be attached: the nature of personal property.					

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Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
204286	TIME	Lawrence B. Linville	0.20	285.00	57.00
10/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Preparation of LBL declaration toward award of attorney's fees and costs in the event that the trial court's decision is in favor of Shelcon.					
204287	TIME	Lawrence B. Linville	0.10	285.00	28.50
10/4/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Assemble the appropriate exhibits.					
204288	TIME	Lawrence B. Linville	0.30	285.00	85.50
10/6/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Locate both time entries and costs on Odenwalder post January 2013.					
204289	TIME	Lawrence B. Linville	0.20	285.00	57.00
10/6/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
LBL note and witness fee to both Richard McDermott and Nancy Thorp.					
204290	TIME	Lawrence B. Linville	0.10	285.00	28.50
10/7/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Memo back to David regarding attachment.					
204291	TIME	Lawrence B. Linville	0.40	285.00	114.00
10/7/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Effect of having recorded a Lis Pendens last year. Research necessity of supersedeas bond in the event that the trial court's decision is in favor of Shelcon and Odenwalder, then seeks an appeal.					
204292	TIME	Lawrence B. Linville	0.10	285.00	28.50
10/10/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
LBL email to Richard McDermott regarding issuance of share certificates and where those certificates are currently maintained.					
204293	TIME	Lawrence B. Linville	0.20	285.00	57.00
10/11/2016		General	0.00	T@1	
WIP		ShelconConst.Odenwa			
Order the transcript of the court's oral opinion as					

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appeal and fees were thus denied. But, the judgment awarded future fees and costs to Shelcon to reimburse Shelcon for its collection efforts on Fleming's judgment. So, there is the question on whether fees and costs can be awarded to Shelcon as costs of collection when Shelcon was not the prevailing party on appeal.				
204300	Lawrence B. Linville	0.10	285.00	28.50
10/13/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
TM note for application for writ of attachment. Schedule for same date as presentation of FF/COL (12/02/2016).				
204301	Lawrence B. Linville	0.20	285.00	57.00
10/17/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Follow up w/ Mr. McDermott re membership share certificates for possible attachment.				
204302	Lawrence B. Linville	0.10	285.00	28.50
10/18/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email from Bardwill re transcripts and Findings of Facts and Conclusions of Law.				
204303	Lawrence B. Linville	0.20	285.00	57.00
10/18/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email Court re time of presentation on 12/02/2016.				
204304	Lawrence B. Linville	0.20	285.00	57.00
10/20/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
How will attachment work? Research garnishment instead of attachment.				
204305	Lawrence B. Linville	0.80	285.00	228.00
11/1/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Draft Court's final order with sufficient specificity of the membership interest so that Writ of Garnishment may be properly and specifically responded to.				

Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Units	DNB Time	Rate	Rate Info	Bill Status	Slip Value
204306	11/7/2016	WIP	Go back through FOF and cite check to the transcript. Make changes. Then to KW to apply the yellow highlighter.	Lawrence B. Linville	0.80	0.00	285.00	T@1		228.00
204307	11/7/2016	WIP	Revisions to judgment to limit the current scope of request for attorney fees/costs.	Lawrence B. Linville	0.60	0.00	285.00	T@1		171.00
204308	11/7/2016	WIP	Proof edit attorney time in current billing period, post 10/15/2016 plus identification and calculation of taxable costs. Add to Declaration of LBL.	Lawrence B. Linville	1.40	0.00	285.00	T@1		399.00
204309	11/8/2016	WIP	Figure the deadline for filing all 3 motions. Note to KW re same.	Lawrence B. Linville	0.10	0.00	285.00	T@1		28.50
204310	11/8/2016	WIP	Go through entire slip listing (41 pages) of all the time entries relating to Odenwelder transfer. Delete repetitive and duplicative entries. Just deletes. No other changes or edits. Email Alyssa re same.	Lawrence B. Linville	1.80	0.00	285.00	T@1		513.00
204311	11/9/2016	WIP	Draft Declaration of DEL re Motion for attorney fees.	Lawrence B. Linville	0.40	0.00	285.00	T@1		114.00
204312	11/8/2016	WIP	Revise/edit FOF/COL/Order to match the transcripts and courts oral opinion.	Lawrence B. Linville	1.20	0.00	285.00	T@1		342.00

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204313	Lawrence B. Linville	0.80	285.00	228.00
11/9/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Prepare costs bill for taxable costs. Que all time in chronological order on slip listing.				
204314	Lawrence B. Linville	0.80	285.00	228.00
11/10/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Research SOL (RCW 19.40.091) on claim versus Odenwalder as transferee. Memo to DEL.				
204315	Lawrence B. Linville	2.30	285.00	655.50
11/10/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Proof, edit the latest revisions to FOF/COL/Order of motion, Declarations (2) and judgment of attorney fees/costs. Work on cost bill. Contract states actual costs. Does this overrule RCW 4.84.080. Research.				
204316	Lawrence B. Linville	0.60	285.00	171.00
11/11/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Email exchange with Club re whether entity (LLF) or natural person is a member. Prepare assignment of judgment to LBL: Club member must be a natural person.				
204317	Lawrence B. Linville	0.60	285.00	171.00
11/11/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Revise App, and Writ of Garnishment.				
204318	Lawrence B. Linville	0.60	285.00	171.00
11/11/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Conferences with DEL re transfer of Club membership: certificate of transfer.				
204319	Lawrence B. Linville	2.60	285.00	741.00
11/11/2016	General	0.00	T@1	
WIP	ShelconConst.Odenwa			
Final proofing of FOF/COL/Order, prepare two (2) sets: one with and one without citations/highlighter. Proof the Motion for attorney fees and Declarations of LBL/DEL, and supplemental judgment. Changes to Kristen.				

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Done! At last! All that remains is inserting fees/costs totals and then the highlighter.				
Grand Total	Billable	319.05		88240.50
	Unbillable	0.00		0.00
	Total	319.05		88240.50

ALLAN L. OVERLAND

September 15, 2017 - 12:57 PM

Transmittal Information

Filed with Court: Court of Appeals Division II
Appellate Court Case Number: 49828-6
Appellate Court Case Title: Shelcon Construction Group, LLC, Respondent v. Scott M. Haymond, et al,
Appellants
Superior Court Case Number: 09-2-15838-5

The following documents have been uploaded:

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