

IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF LINN

IN THE MATTER OF

Case No.: 19DR03123

KYLA MAZHARY-CLARK,

Petitioner,

PETITIONER'S ORCP 68 STATEMENT OF
ATTORNEY FEES AND COSTS

JAMIE CROMPTON fka CLARK,

Respondent.

and

KENNETH CLARK,

Respondent.

STATE OF OREGON)
)ss.
County of Linn)

The undersigned attorney offers the following facts in support of an award of reasonable and necessary attorney's fees, costs and disbursements:

1. Petitioner is authorized to seek an award of "...reasonable attorney fees and costs and expenses reasonably incurred..." in this action pursuant to ORS 107.105(j) as authorized by ORS 109.103(1) which provides that in a proceeding involving children of unmarried parents "The parents have the same rights and responsibilities regarding the custody and support of, and parenting time with, their child that divorced parents have, and the provisions of ORS 107.094 to ORS

PETITIONER'S ORCP 68 STATEMENT OF ATTORNEY FEES AND COSTS - 1

1 107.449 that relate to custody, support and parenting time, the provisions of ORS
2 107.755 to 107.795 that relate to mediation procedures, and the provisions of
3 ORS 107.810, 107.820 and 107.830 that relate to life insurance, apply to the
4 proceeding.”

5 2. Petitioner is authorized to seek an award of costs and disbursements pursuant to
6 ORCP 68(B) which provides that “In any action, costs and disbursements shall be
7 allowed to the prevailing party unless these rules or any other rule or statute direct
8 that in the particular case costs and disbursements shall not be allowed to the
9 prevailing party or shall be allowed to some other party, or unless the court
10 otherwise directs. If, under a special provision of these rules or any other rule or
11 statute, a party has a right to recover costs, that party shall also have a right to
12 recover disbursements.”

13 3. The number of hours and services rendered in this matter by this firm are set forth
14 in detail on Exhibit “1,” attached hereto and by reference incorporated herein, and
15 are summarized as follows:
16

17

Name	Position	Hourly Rate	Total Hours	Total Fees
Andrew D. Ivers	Attorney	\$ 400.00	47.40	\$18,960.00
Julie Lindgren-Bower	Legal Assistant	\$ 150.00	17.20	\$2,580.00
Laura Howard	Legal Assistant	\$ 150.00	2.20	\$330.00
Miranda Fernandez	Legal Assistant	\$ 100.00	1.30	\$130.00
TOTAL HOURS/FEES			68.10	\$22,000

18
19
20
21

22 4. Costs and Disbursements are defined in ORCP 68(A)(2) as “...reasonable and
23 necessary expenses incurred in the prosecution or defense of an action, other than
24 for legal services, and include the fees of officers and witnesses; the expense of
25

PETITIONER’S ORCP 68 STATEMENT OF ATTORNEY FEES AND COSTS - 2

1 publication of summonses or notices, and the postage where the same are served
2 by mail; any fee charged by the Department of Transportation for providing
3 address information concerning a party served with summons pursuant to Rule 7
4 D(4)(a)(ii); the compensation of referees; the expense of copying of any public
5 record, book, or document admitted into evidence at trial; recordation of any
6 document where recordation is required to give notice of the creation,
7 modification, or termination of an interest in real property; a reasonable sum paid
8 a person for executing any bond, recognizance, undertaking, stipulation, or other
9 obligation therein; and any other expense specifically allowed by agreement, by
10 these rules, or by any other rule or statute. The court, acting in its sole discretion,
11 may allow as costs reasonable expenses incurred by a party for interpreter
12 services. The expense of taking depositions shall not be allowed, even though the
13 depositions are used at trial, except as otherwise provided by rule or statute.”

15 5. Petitioner incurred \$708.95 in costs as set forth in detail on Exhibit “2,” attached
16 hereto and by reference incorporated herein.

17 6. Petitioner’s position and proposal for custody and parenting time prevailed and
18 Petitioner’s proposal was adopted in its entirety by the Court at trial and,
19 therefore, Petitioner is entitled to the recovery of \$708.95 for costs as the
20 prevailing party as authorized by ORCP 68A(2).

21 7. Pursuant to ORS 20.075(1), a court shall consider the following factors in
22 determining whether to award attorney fees in any case in which an award of
23 attorney fees is authorized by statute and in which the court has discretion to
24 decide whether to award attorney fees:
25

PETITIONER’S ORCP 68 STATEMENT OF ATTORNEY FEES AND COSTS - 3

1 ORS 20.075(1):

2 X The conduct of the parties in the transactions or occurrences that gave rise to the
3 litigation, including any conduct of a party that was reckless, willful,
4 malicious, in bad faith or illegal.

5 X The objective reasonableness of the claims and defenses asserted by the parties.

6 _____ The extent to which an award of an attorney fee in the case would deter others
7 from asserting good faith claims or defenses in similar cases.

8 X The objective reasonableness of the parties and the diligence of the parties and
9 their attorneys during the proceedings.

10 _____ The objective reasonableness of the parties and the diligence of the parties in
11 pursuing settlement of the dispute.

12 _____ The amount that the Court has awarded as a prevailing party fee under ORS
13 20.190.

14 X Such other factors as the Court may consider appropriate under the circumstances
15 of the case.

16 A court shall consider the factors specified in subsection (1) of this section in
17 determining the amount of an award of attorney fees in any case in which an award of attorney
18 fees is authorized or required by statute. In addition, the court shall consider the following
19 factors in determining the amount of an award of attorney fees in those cases:

20 ORS 20.075(2):

21 _____ The novelty and difficulty of the questions involved;

22 PETITIONER'S ORCP 68 STATEMENT OF ATTORNEY FEES AND COSTS - 4

- 1 X Skills requisite to perform the legal services properly;
2 The likelihood, if apparent to the client, that the acceptance of the particular
3 employment will preclude other employment by the lawyer;
4 X Fees customarily charged in the locality for similar legal services;
5 X The amount involved and the results obtained;
6 The time limitations imposed by the client or by the circumstances;
7 _____ The nature and length of the professional relationship with the client;
8 X The experience, reputation and ability of the lawyer performing the services;
9 and
10 _____ Whether the fee is fixed or contingent.

12 **The experience, reputation and ability of the lawyer performing the services**

13 Counsel for Petitioner has been licensed with the Oregon State Bar and has practiced law
14 continuously in the State of Oregon for over 17 years. Counsel's individual law practice focuses
15 solely in the area of family law/domestic relations.
16

17 Counsel has been, or is currently, a member of the following groups or committees
18 involving domestic relations law:

- 19 1. Former member of the Executive Committee for the Family Law Section of the
20 Oregon State Bar.
21 2. Former member of the Mediation and Arbitration Commission for Linn and Benton
22 Counties.
23 3. Former Member of Parenting Plan Committee for Linn County to make
24 updates/changes to Model Linn County Parenting Plan.
25

1 4. Member of Linn County Family Law Advisory Committee.

2 Counsel has substantial experience handling, managing, negotiating and appearing for
3 hearings and trials in domestic relations litigation. Counsel for Petitioner has appeared in over
4 1,300 individual domestic relations matters in 17 counties in the State of Oregon. Counsel for
5 Petitioner's hourly rate of \$400.00 per hour is on the higher side for attorneys within the local
6 geography of Linn County and Benton County where counsel's office is located, but counsel's
7 hourly rate is commensurate with the hourly rate for attorneys that have similar experience and
8 possess a similar breadth and depth of knowledge.

9
10 **The conduct of the parties in the transactions or occurrences that gave rise to the**
11 **litigation, and the objective reasonableness of the claims and defenses asserted by the**
12 **parties**

13 Respondent Jamie Crompton (hereinafter "Respondent") filed three Motions to vacate
14 the original custody Judgment in this matter. That judgment was entered on August 15th, 2019.
15 Respondent waited until almost two years had passed prior to filing her first Motion to Vacate on
16 June 24th, 2021, well past the one year time frame allowed by the Oregon Rules of Civil
17 Procedure, which was denied on June 28th, 2021. In spite of that denial, Respondent proceeded to
18 file an additional motion asking the court to vacate the judgment on October 2nd, 2021, which
19 was denied on October 14th, 2021. On January 5th, 2022 Respondent filed her third and final
20 motion to set aside the 2019 judgment which was denied at a hearing on May 23rd, 2022. Despite
21 the three previous rulings regarding Respondent's repeated motions to vacate or set aside the
22 original judgment, Respondent implicitly raised the issue of setting aside the judgment at trial by
23 covering the same ground and once again covering the same facts and arguments both in
24 Respondent's trial memorandum and at the modification trial before the Court on January 26th,

25 PETITIONER'S ORCP 68 STATEMENT OF ATTORNEY FEES AND COSTS - 6

1 2023. As examples, Respondent once again focused on the issues of the nature of the relationship
2 between Petitioner and Respondent in 2018, the type of notice Respondent received prior to the
3 judgment being entered, and when Petitioner notified Respondent of the existence of the
4 judgment. Respondent's trial memorandum and the case she presented at trial were interwoven
5 with facts, statements, and arguments regarding setting aside the judgment such as "This case
6 presents an interesting issue to the Court because Petitioner served Mother in a way that she
7 knew Mother would not get actual notice and was dishonest in her declaration filed with the
8 court to show she met the requirements to even be granted legal custody of another person's
9 children." and referring to "...the dishonest and selfish motive that Petitioner has displayed in
10 creating this novel legal situation..." Respondent's renewed, and ultimately her fourth, effort to
11 raise issues relating to setting aside the judgment were unsuccessful at trial.
12

13 Petitioner has consistently and repeatedly asserted that she should maintain custody and
14 that Respondent should have phase in parenting time that would ultimately lead to more frequent
15 parenting time between Respondent and the children. The final settlement offer from Petitioner
16 to Respondent was included as a trial exhibit and eventually adopted by the court. Even after the
17 court awarded Respondent parenting time pursuant to the Model Parenting Plan for Linn County,
18 Long Distance Plan, 2018 Revision, Respondent objected to the parenting time provisions in the
19 judgment. At the hearing on objections, Respondent ultimately agreed to a parenting plan that
20 was the rough equivalent of Petitioner's proposed parenting plan at trial and Respondent's own
21 objections and agreements made at the hearing on objections to the form of the judgment
22 resulted in Respondent receiving less parenting time with the children than she was initially
23 awarded by the Court.
24
25

PETITIONER'S ORCP 68 STATEMENT OF ATTORNEY FEES AND COSTS - 7

1 **The objective reasonableness of the parties and the diligence of the parties in**
2 **pursuing settlement of the dispute**

3 Petitioner sent multiple settlement offers to Respondent which were denied without
4 reasonable counteroffers. Petitioner offered more frequent parenting time to Respondent which
5 was denied by Respondent due to the hardship of traveling from California to Oregon to see the
6 children. Petitioner then offered less frequent parenting time that would coincide with the times
7 Respondent was in Oregon for parenting time for her other children (not at issue) and that was
8 again denied by Respondent. Had Respondent accepted Petitioner's proposal, she could have
9 spent far more time with the children while this matter was pending and moving towards trial,
10 and had Respondent accepted Petitioner's proposal for parenting time with a phase in,
11 Respondent could have spent the duration of the litigation increasing the amount of time that she
12 spent with them while the plan was phased in. Instead, Respondent refused to consider any
13 alternative besides a change in custody and removing the children from the Petitioner.
14

15 Respondent's position throughout the case has been that the children should be returned
16 to her without any sort of phase in or reintegration, and that Petitioner should have no parenting
17 time with the children, despite the length of time the children have resided with Petitioner.

18 Respondent's position and the focus of Respondent's testimony, evidence, and the issues that she
19 raised throughout the course of the present litigation were more about Petitioner's perceived
20 misconduct as opposed to the children, and served primarily to demonstrate the degree of
21 Respondent's animus towards Petitioner as opposed articulating what is in the best interests of
22 two little girls.
23


24 Respondent's desire to have Sage and Sadie, who were 6 years old and 5 years old at the
25 time of trial, immediately removed from their home and have no further contact with someone

1 with whom they enjoyed a parent-child relationship spoke to a desire to remove the children
2 from the Petitioner's life as opposed to having the children's lives enriched by their relationship
3 with Petitioner even if the Court had determined that a change in custody was in their best
4 interest. Respondent's overwhelming focus was consistently on the Petitioner's conduct and not
5 on the children themselves. Her focus was on the Petitioner and wanting to remove the children
6 from the Petitioner's life as opposed to considering whether it was in the children's best interest
7 to have the Petitioner removed from Sage and Sadie's lives.

8
9 5. Based on the above, Petitioner is entitled to an award of reasonable and necessary
10 attorney fees in the sum of \$22,000.00 and costs in the amount of \$708.95.

11 I HEREBY DECLARE THAT THE ABOVE STATEMENT, INCLUDING THE
12 INFORMATION CONTAINED IN THE EXHIBIT TO THIS STATEMENT, IS TRUE TO
13 THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS
14 MADE BY USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY OF
15 PERJURY.

16 DATED this 11 day of July, 2023.


17
18 
19 _____
20 Andrew D. Ivers, OSB #050664
21 Attorney for Petitioner
22 andy@ivers.law
23
24
25

1 **CERTIFICATE OF E-SERVICE**

2 STATE OF OREGON)
3) ss.
4 County of Linn)

5 I, ANDREW D. IVERS, hereby certify that I am one of the attorneys for the Petitioner;
6 that I served the within **PETITIONER'S ORCP 68 STATEMENT OF ATTORNEY FEES
AND COSTS** on Respondent by E-Service to William Boaz, attorney of record for Respondent,
7 at his email address as recorded on the date of service in the eFiling system.











8 DATED this 11 day of July, 2023.

9 
10 Andrew D. Ivers, OSB #050664
11 Attorney for Petitioner
12 andy@ivers.law

Activities Export

07/10/2023










11:10 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
07/10/2023		Draft ORCP 68 Statement of Attorney Fees  Unbilled	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	1.50h	\$400.00	-	\$600.00
06/26/2023		scanned and saved notes from client on Judgement draft objections.  Non-billable	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Miranda Fernandez	0.20h	\$100.00	\$20.00	-
06/20/2023		Email from Mr. Boaz w/signed Supplemental Judgment; download and print; scan and efile; email to Mr. Boaz.  Billed invoice 4072	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.30h	\$150.00	-	\$45.00
06/09/2023		Prepared edits per opposing counsel's email to judgment Email correspondence with client RE: form of the judgment (x2) Email correspondence with opposing counsel to send copy of judgment  Billed invoice 4072	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.60h	\$150.00	-	\$90.00
05/15/2023		Email correspondence with opposing counsel RE: hearing (x6+) Email correspondence with client RE: hearings (x4) Email correspondence with Linn County Court RE: hearing (x2)  Billed invoice 3887	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	1.00h	\$150.00	-	\$150.00
					68.10h		\$80.00 0.80h	\$21,733.00 67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
05/12/2023		Transcribed Hearing; email client and ADI  Billed invoice 3887	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	1.50h	\$150.00	-	\$225.00
04/17/2023		Email correspondence with Linn County Court RE: audio record (x2) Conferral with ES RE: CD payment  Billed invoice 3703	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.30h	\$150.00	-	\$45.00
04/17/2023		Prepared objections and judgment for ADI phone call with opposing counsel  Billed invoice 3703	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
04/07/2023		Conferral with ADI RE: objections from opposing counsel  Billed invoice 3703	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
04/04/2023		Email correspondence with opposing counsel RE: appointment with ADI (x4); calendared  Billed invoice 3703	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.50h	\$150.00	-	\$75.00
04/04/2023		Email correspondence with Linn County Court RE: hearing (x4) Calendared Email correspondence with client RE: hearing (x2)  Billed invoice 3703	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.60h	\$150.00	-	\$90.00
					68.10h		\$80.00	\$21,733.00
							0.80h	67.30h

Activities Export

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11:10 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
03/23/2023		Email correspondence with opposing counsel RE: judgment for review; also mailed  Billed invoice 3515	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
03/23/2023		Scanned, saved to JLB folder, and mailed UTC Lt and judgment to OC.  Non-billable	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Miranda Fernandez	0.30h	\$100.00	\$30.00	-
03/23/2023		Draft UTCR letter and mail to Mr. Boaz  Billed invoice 3515	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	0.20h	\$400.00	-	\$80.00
03/22/2023		Edit and review the proposed Supplemental Judgment  Billed invoice 3515	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	1.00h	\$400.00	-	\$400.00
03/21/2023		break down objection hearing exhibit binders and scan in exhibits and save to client file.  Non-billable	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Miranda Fernandez	0.30h	\$100.00	\$30.00	-
03/08/2023		Email correspondence with Linn County Court RE: judgment entry (x2) Filed Judgment with Linn County Circuit Court Hearing scheduled Prepared hearing binder for ADI	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.80h	\$150.00	-	\$120.00

68.10h **\$80.00** **\$21,733.00**
0.80h 67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Billed invoice 3515						
03/06/2023	⌵	Email correspondence with Linn County Court RE: objections/ judgment entry (x4) ● Billed invoice 3515	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.40h	\$150.00	-	\$60.00
02/27/2023	⌵	Email correspondence with Linn County Court RE: hearing dates (x4); calendared ● Billed invoice 3515	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.40h	\$150.00	-	\$60.00
02/24/2023	⌵	Emails from court to set hearing date. Forwarded emails to JLB, updated JLB on current status. ● Billed invoice 3326	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Miranda Fernandez	0.30h	\$100.00	-	\$30.00
02/22/2023	⌵	Email correspondence with opposing counsel to send updated judgment and exhibits ● Billed invoice 3326	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
02/21/2023	⌵	Review Objection to Form of Judgment, draft response letter, review and edit judgment ● Billed invoice 3326	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	2.00h	\$400.00	-	\$800.00
02/14/2023	⌵	Email correspondence with opposing counsel to send judgment for review; also sent via mail	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
					68.10h		\$80.00	\$21,733.00
							0.80h	67.30h

Activities Export

07/10/2023

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		● Billed invoice 3326						
02/14/2023	⌵	Draft UTCR letter to Boaz ● Billed invoice 3326	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	0.20h	\$400.00	-	\$80.00
02/01/2023	⌵	Draft Supplemental Judgment of Modification ● Billed invoice 3326	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	1.50h	\$400.00	-	\$600.00
01/31/2023	⌵	Receipt and review of opinion letter from Linn County Circuit Court; saved to client file Email correspondence with client RE: opinion letter (x2) ● Billed invoice 3326	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.30h	\$150.00	-	\$45.00
01/26/2023	⌵	Assisted ADI at trial (time reduction) ● Billed invoice 3154	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	2.00h	\$150.00	-	\$300.00
01/26/2023	⌵	Trial, Linn County, Judge Caso. Final review and trial preparation prior to 9a start, trial ran until 6p. ● Billed invoice 3154	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	10.00h	\$400.00	-	\$4,000.00
01/25/2023	⌵	Prepared/ labeled exhibits for trial Prepared Exhibit Books (x4) Updated Pleadings Book for ADI	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark	Julie Lindgren-Bower	2.00h	\$150.00	-	\$300.00
					68.10h		\$80.00 0.80h	\$21,733.00 67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Printed Depositions for ADI ● Billed invoice 3154	Psychological Custody Matter					
01/25/2023	🕒	Meet with client. Final trial preparation for trial set 1/26/2023. Finish notes/structure/outline. Review exhibits. ● Billed invoice 3154	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	6.00h	\$400.00	-	\$2,400.00
09/07/2022	🕒	Email correspondence from OC, save letter and Notice of Rep to client file Email correspondence to client forwarding email from OC ● Billed invoice 2511	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.20h	\$150.00	-	\$30.00
08/18/2022	🕒	Responded to email from Amy Dean Re: DHS evaluation meeting. ● Billed invoice 2348	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Miranda Fernandez	0.10h	\$100.00	-	\$10.00
08/16/2022	🕒	Called and emailed Amy Dean to schedule meeting with Client and ADI. ● Billed invoice 2348	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Miranda Fernandez	0.10h	\$100.00	-	\$10.00
08/12/2022	🕒	Email from court, save Notice of ERC to client Calendar ERC Provide copy of Notice to client ● Billed invoice 2348	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.20h	\$150.00	-	\$30.00
08/11/2022	🕒	Email correspondence from court with dates for ERC	06235-Mazary-Clark 19DR03123: Mazhary-	Laura Howard	0.20h	\$150.00	-	\$30.00

68.10h **\$80.00** **\$21,733.00**

0.80h 67.30h

Activities Export













07/10/2023

11:10 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		Review calendar Email correspondence to court providing availability for ERC ● Billed invoice 2348	Clark vs. Clark Psychological Custody Matter					
08/10/2022		Email correspondence from court re: hearing needed, response to court ● Billed invoice 2348	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.10h	\$150.00	-	\$15.00
08/04/2022		Email correspondence from OP in response to settlement proposal, review and save email to client file, forward and print for ADI ● Billed invoice 2348	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.30h	\$150.00	-	\$45.00
08/03/2022		Scan and save letter with proposed parenting plan Prepare and mail letter and proposed parenting plan to OP ● Billed invoice 2348	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.20h	\$150.00	-	\$30.00
08/02/2022		Prepare updates to letter to OP and proposed parenting plan ● Billed invoice 2348	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.20h	\$150.00	-	\$30.00
07/21/2022		Email correspondence from OC, save Motion, Declaration and Order to Withdraw to client file Email from court, save signed Order to Withdraw to client file ● Billed invoice 2195	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.30h	\$150.00	-	\$45.00
					68.10h		\$80.00	\$21,733.00
							0.80h	67.30h

Activities Export












07/10/2023
11:10 AM

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
06/28/2022		Receipt and review of signed Order Denying Set Aside; saved to client file  Billed invoice 2195	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
06/20/2022		Prepared edits to letter from ADI and proposed parenting plan  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
06/16/2022		Email from court reporter, save deposition transcripts to file  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Laura Howard	0.20h	\$150.00	-	\$30.00
06/09/2022		Email correspondence with opposing counsel RE: edits to Order Denying Set Aside (x2) Prepared edits to Order Email correspondence with opposing counsel RE: edits made; reattached order  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.50h	\$150.00	-	\$75.00
06/06/2022		Email correspondence with opposing counsel to send Order Denying Set Aside and letter from ADI; also mailed  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
06/03/2022		Prepared edits to Order Denying Motion to Set Aside  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark	Julie Lindgren-Bower	0.10h	\$150.00	-	\$15.00
					68.10h		\$80.00 0.80h	\$21,733.00 67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
			Psychological Custody Matter					
06/03/2022		Prepared Order Denying Motion to Set Aside Prepared Letter to Opposing Counsel with Order  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	1.50h	\$400.00	-	\$600.00
06/02/2022		Receipt and review of opinion letter from court; saved to client file  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.10h	\$150.00	-	\$15.00
06/02/2022		Review file, pleadings, notes. Deposition of Jamie Clark.  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	3.00h	\$400.00	-	\$1,200.00
06/01/2022		Email correspondence with Antrim Court Reporting RE: Zoom Depositions (x2) Updated Pleadings Book for ADI  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.40h	\$150.00	-	\$60.00
05/23/2022		Hearing re: set aside judgment and default, Linn County, Judge Caso  Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	2.00h	\$400.00	-	\$800.00
05/23/2022		Filed Petitioner's Trial Memorandum Email correspondence with Linn	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark	Julie Lindgren-Bower	0.30h	\$150.00	-	\$45.00
					68.10h		\$80.00	\$21,733.00
							0.80h	67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		County Court and opposing counsel to send trial memorandum (x2) ● Billed invoice 2195	Psychological Custody Matter					
05/22/2022		Finish Hearing Memorandum re: set aside, set for hearing 5/23, Linn County, Judge Caso ● Billed invoice 2026	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	7.00h	\$400.00	-	\$2,800.00
05/20/2022		Prepared pleadings book for ADI Email correspondence with opposing counsel to send additional discovery and response from ADI ● Billed invoice 2195	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.70h	\$150.00	-	\$105.00
05/19/2022		Saved all text messages and additional discovery from client into client file ● Billed invoice 2195	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.30h	\$150.00	-	\$45.00
05/04/2022		Email correspondence with opposing counsel RE: depositions (x2) Prepared Notice of Depositions; mailed and emailed to opposing counsel Email correspondence with Antrim Court Reporting RE: depositions and Zoom link (x4) ● Billed invoice 2195	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.90h	\$150.00	-	\$135.00
05/02/2022		Email correspondence with	06235-Mazary-Clark	Julie	0.10h	\$150.00	-	\$15.00
					68.10h		\$80.00	\$21,733.00
							0.80h	67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		opposing counsel RE: depositions (no response) ● Billed invoice 2195	19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Lindgren-Bower				
04/28/2022	Ⓜ	Depositions ● Billed invoice 1731	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	4.00h	\$400.00	-	\$1,600.00
04/28/2022	Ⓜ	Prepared exhibits books from opposing counsel ● Billed invoice 1731	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.30h	\$150.00	-	\$45.00
04/12/2022	Ⓜ	Email correspondence with opposing counsel RE: confer sent and not adding in three days for mailing to RFP request ● Billed invoice 1731	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.10h	\$150.00	-	\$15.00
04/11/2022	Ⓜ	Email correspondence with opposing counsel to send all discovery from client with Petitioner's First Request for Production ● Billed invoice 1731	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
04/11/2022	Ⓜ	Draft Response to Request for Production, scan and save documents ● Billed invoice 1731	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	2.00h	\$400.00	-	\$800.00
					68.10h		\$80.00	\$21,733.00
							0.80h	67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
04/01/2022		Saved discovery from opposing counsel to client file Billed invoice 1731	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
03/01/2022		Email correspondence with opposing counsel to send letter and RFP (x2) Billed invoice 1586	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
02/28/2022		Prepared letter to opposing counsel Prepared Request for Production Billed invoice 1586	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	2.00h	\$400.00	-	\$800.00
02/28/2022		Email correspondence with Linn County Court RE: appearance date (x2); confirmed and calendared Billed invoice 1586	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.20h	\$150.00	-	\$30.00
02/25/2022		Email correspondence with Linn County Court RE: Set Aside Hearing (x4) Billed invoice 1417	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Julie Lindgren-Bower	0.40h	\$130.00	-	\$52.00
02/23/2022		Office conference with client Billed invoice 1417	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	0.50h	\$350.00	-	\$175.00
02/21/2022		Email correspondence with	06235-Mazary-Clark	Julie	0.20h	\$130.00	-	\$26.00

68.10h **\$80.00** **\$21,733.00**
0.80h 67.30h

Activities Export

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Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
		opposing counsel RE: deposition dates (x2) *Waiting on new dates from opposing counsel ● Billed invoice 1417	19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Lindgren-Bower				
02/17/2022	⏴	Draft Response and Objection to Motion to Set Aside ● Billed invoice 1417	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	2.00h	\$350.00	-	\$700.00
01/24/2022	⏴	Prepared Notice of Representation and 10 Day letter to Lance Youd ● Billed invoice 1265	06235-Mazary-Clark 19DR03123: Mazhary-Clark vs. Clark Psychological Custody Matter	Andy Ivers	1.00h	\$350.00	-	\$350.00
					68.10h		\$80.00 0.80h	\$21,733.00 67.30h

Date	Costs	Amount
05.16.2022	Deposition Transcript	\$ 249.75
07.06.2022	Deposition Transcript	\$ 450.20
	CD Request - Judgment Objections Hearing	\$ 9.00
TOTAL		\$ 708.95