LAW OFFICES OF ROBISON, BELAUSTEGUI, SHARP AND LOW A PROFESSIONAL CORPORATION

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Carolyn Tanner

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12/08/2016

ACCOUNT NO:

1363-001M

STATEMENT NO:

6

Switch, Ltd. vs.

PREVIOUS BALANCE

\$50,762.05

FEES THROUGH 11/25/2016							
			HOURS				
10/31/2016	KRR	Receive, review stipulation to stay (.3). Telephone conference with Carolyn regarding proposed stay (.4). Telephone conference with Nick Santoro regarding position being taken by Nevada Energy and issues related to stay (.5). Work on Safe Harbor Rule 11 letter to Todd Bice (.3). Telephone conference with Todd Bice rejecting request to stay proceedings (.4). Call with client (0.25); review offer re stay pending settlement discussions with NV Energy (0.25)	1.90 0.50	760.00 140.00			
11/01/2016	KRR	Commence review and analysis of Switch's opposition to motion to dismiss (.9). Telephone conference with Garrett Weir regarding position being taken by PUCN on accusations made in Switch's opposition (.3). Telephone conference with Nick Santora (Nevada Energy counsel) regarding positions to be taken by NV Energy in it's motion to dismiss (.4). Work on retention letter and engagement confirmation for Professor Hancock regarding expert services (.6). Redraft engagement letter per Hancock's directions (.2). Email traffic with client and telephone conferences concerning timeline of events relative to use of user names and passwords for each social media platform account (.5). Start draft of Tanner's reply in support of motion to dismiss (.3). Review opposition to motion to dismiss and countermotion for continuance (1); research re whether contents of public records are subject to judicial notice (1); outline argument of reply re court may properly take judicial notice of and consider exhibits on motion to dismiss (1.05); call with client (0.25); research re whether personal social media postings are acting under color of state law to support a 1983 claim (2); research re whether absolute immunity extends to private counsel and/or employees (1); outline reply ISO motion to dismiss (1); draft argument portion of reply ISO motion to dismiss re court may properly take judicial notice of exhibits (1.3)	3.20 7.60	1,280.00 2,128.00			
11/02/2016	KRR	Telephone conference with Garrett Weir regarding Switch's					

11/02/2016

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ACCOUNT NO: STATEMENT NO:

1363-001M

Switch, Ltd. vs.

			HOURS	
	TMS	opposition to Tanner's motion to dismiss and to solicit cooperation for Commissioners to sign declarations (.9). Redraft declarations of Noble, Wagner, and Burtenshaw (.7). Telephone conference with Professor Jeffrey Hancock regarding social media searches (.7). Receive and review proposed stipulation and order extending time for Nevada Energy to respond to Switch's amended complaint (.2). Draft argument portion of motion to dismiss reply re failure to state a claim under 1983 (1.3); draft argument portion of motion to dismiss re absolute immunity (0.7); draft argument portion of motion to dismiss re qualified immunity and NRS 239 (2); begin draft of argument portion of motion to dismiss re conspiracy (1); review Switch's allegations re conspiracy to determine what, exactly, Switch is alleging the conspiracy was (0.7); review NV Energy's right to remain a monopoly irrespective of whether a bundled customer leaves and the impact of Switch's proposed departure (1); call with	2.50	1,000.00
		PUCN counsel (0.3)	7.00	1,960.00
11/03/2016	TMS	Edit reply in support of motion to dismiss (1.8); edit declarations for commissioners (0.2)	2.00	560.00
11/04/2016	TMS	Analyze propriety of bringing second anti-SLAPP motion	0.20	56.00
11/07/2016	TMS	Incorporate client edits into reply (1); edit for KRR review (0.2); research re when Rule 56(d) requests should be granted (1); outline opposition to Rule 56(d) request (0.5); insert and edit argument re motion is properly one for dismissal and not summary judgment (0.5); insert and edit argument re cannot prevail as a matter of law (0.4); draft remaining argument portion of opposition (1); edit opposition (0.6)	5.20	1,456.00
11/08/2016	KRR	Work on drafting reply (introduction/conclusion) in support of Tanner's motion to dismiss. Continue work on Tanner's opposition to Switch's continuance motion. Draft introduction/conclusion. Revise portions of argument. Review KRR edits to draft reply and opposition	2.40 0.30	960.00 84.00
11/09/2016	KRR	Continue work on draft of opposition to motion to continue and opposition to motion for summary judgment (1.1). Work on authentication affidavit for exhibits and notifications to Switch concerning access to Tanner's social media platform (.8). Emails Garrett Weir. Work on review of declarations provided by Commissioners (.4). Work on finalizing draft of Tanner's reply in support of motion to dismiss (.8). Review additional KRR edits	3.10 0.40	1,240.00 112.00
11/10/2016	KRR	Continue work on Tanner's reply to Switch's opposition to motion to dismiss, finalize and file (.9). Work on opposition to counter-motion for continuance to engage in ongoing discovery (.9).	1.80	720.00
11/11/2016	KRR	Continue to draft introduction and conclusion to Tanner's opposition to Switch's motion to continue Wrath motion for summary judgment		

Carolyn T	- anner			Page: 3 12/08/2016					
Carolyn tanner			ACCOUNT NO: STATEMENT NO:	1363-001M 6					
Switch, Ltd. vs.									
			HOURS						
		request. Receive, review Commissioner's Declarations. Finalize opposition. Organize and index exhibits. Prepare affidavit in support of opposition. Finalize and file.	2.80	1,120.00					
11/15/2016	TMS	Research when rule 11 sanctions are appropriate (0.6); outline ru 11 motion (0.3); begin draft argument portion re no evidentiary support (0.4)	1.30	364.00					
11/16/2016	KRR	Work on second anti-SLAPP motion. Work on Rule 11 motion ar cover letter compliant with FRCP 11 Safe Harbor Provisions. Telephone conference with Garret Weir and Haley.	nd 1.00	400.00					
	TMS	Analyze grounds for moving forward to recover costs expended (0.2); finish draft argument portion of Rule 11 re no evidentiary support (2); draft argument of Rule 11 re no legal basis (1); draft argument portion of Rule 11 re improper purpose (2); edit Rule 1 motion (1); edit anti-SLAPP motion to convert into new anti-SLAP	Ψ'	1 022 00					
		motion (0.7)	6.90	1,932.00					
11/22/2016	TMS	Review reply	0.30	84.00					
11/23/2016	TMS	Incorporate KRR edits into motion for anti-SLAPP (1); edit motion anti-SLAPP (2.5); draft KRR letter re Rule 11 (0.5); edit Rule 11 motion (1); additional edits to anti-SLAPP (0.5); emails re Rule 1 motion (0.25)		1,610.00					
			0.80	320.00					
11/25/2016	KRR KRR	Proofed second anti-SLAPP motion and finalized corrections.	0.90	360.00					
		FOR CURRENT SERVICES RENDERED	57.85	18,646.00					
		EXPENSES THROUGH 11/25/2016							
11/18/2016		In house photocopy expense.		3.75					
11/23/2016		Check issued to Thomson Reuters - West Legal research.		925.75					
		TOTAL EXPENSES		929.50					
		TOTAL CURRENT WORK		19,575.50					
		PAYMENTS THROUGH 12/08/2016							
11/14/2016 11/14/2016		Cost payment. Fee payment.		-8.83 -33,906.00 -274.22					
12/07/2016 12/07/2016		Cost payment. Fee payment.		-274.22 -16,573.00					
1210112010		TOTAL PAYMENTS		-50,762.05					
		BALANCE DUE		\$19,575.50					

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