ORIGINAL

LAW OFFICES OF JOHN G. WÜRM
JOHN G. WÜRM, State Bar No. 106475
27321 North Bay Road
Post Office Box 1875
Lake Arrowhead, California 92352
Telephone: 909/337-2557
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Attorney for Plaintiff, Arrowhead Woods Architectural Committee, Inc., a California corporation

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN BERNARDINO CENTRAL DIVISION

ARROWHEAD WOODS ARCHITECTURAL COMMITTEE, INC., a California corporation,

Plaintiff,

v.

GEORGE D. HATT, DONNA R. HATT, and all persons unknown claiming any legal or equitable right, title, estate, lien or interest in the property described in the Complaint, named as DOES 1 to 50, inclusive

Defendants.

Case No: CIVDS 1400240

DECLARATION OF JOHN G. WURM IN SUPPORT OF MOTION FOR ATTORNEY'S FEES

Date: November 10, 2015
Time: 8:30 a.m.
Dept: S-37

I, John G. Wurm, declare as follows:

1. I am an attorney licensed to practice in the State of California, and am the attorney of record for Claimants. The matters declared to herein are within my own personal knowledge and if called to, I could completely testify thereto.

2. I represented Plaintiff since 1990 in well over 100 matters, including litigation and non-litigation matters. My normal billing rate is $250 per hour. I bill Plaintiff at $215 per hour and charge my secretarial time at $50.00 per hour (my normal secretarial billing rate). This Motion for Attorney's Fees is being made pursuant to the attorney's fees clause in the Declaration of Restrictions, Exhibit 1. In XII(d), the Declaration of Restrictions provides "In any legal or equitable proceeding for the enforcement or to restrain the violation of any provision of this Declaration, the prevailing party shall be entitled to recover such reasonable attorney's fees as the Court shall award from the unsuccessful party of parties."

3. The total amount of my office's charges for legal services through trial, attorney's time and secretarial time is $33,990.36. Of that amount, $2,816.69 was for secretarial time. The total attorney time billed is $31,173.67. I've circled the charges related to the action and marked out most of unrelated actions in attached Exhibit "A"; billings invoiced to the Plaintiff, which have all been paid. Additionally, Plaintiff paid Michael Ottoson, their expert arborist, $1,230.00 for testimony. I estimate I will spend an additional three hours to prepare the Motion, and two hours to appear on it. Exhibit "A" does not include attorney time of $3,440.00 which has not yet been billed to the Plaintiff. Additionally, Plaintiff has submitted a cost bill of $1,441.00. 90% of the fees were expended on establishing Plaintiff's right to enforce the Declaration of Restrictions, the validity of the extension of the Declaration of Restrictions, and the issue of Plaintiff's "existence".

4. Below are my comments on the factors set forth in *Stokus v. Marsh* (1990) 217 Cal.App.3d 647:

a. The nature of litigation. Because the Defendants sought to invalidate the extension of the Declaration of Restrictions, Plaintiff had no choice but to prosecute the litigation. This was the first Complaint filed after the extension of the Declaration of Restrictions. The Defendants indicated from the start that they did not accept Plaintiff's authority. Attached as Exhibit "B" is the letter I wrote the Defendants before filing the lawsuit. As my letter indicates, I took the Defendants' position regarding insurance and orders from Cal Fire into consideration. I provided the Defendants with copies of the Declaration of Restriction (Exhibit 1) and Certificate of Amendment (Exhibit 2). I explained the legal consequences of not complying with the Declaration of Restrictions which included attorney's fees payable if he lost. I asked the Defendants to provide me with any additional information that they had. I asked for copies of documents from Cal Fire. Attached as Exhibit "C" is a copy of Mr. Hatt's reply letter. He did not provide me with any written orders from Cal Fire. He admitted the tree had "some green vegetation". His letter stated that "if I had asked (Plaintiff) for permission and they said "no", I would have cut down the tree anyway." He ended by stating that he would rather "go to court and let a judge decide who is right". Based upon Mr. Hatt's letter to me, his letter to Plaintiff, (Exhibit 49), it appeared to me that short of filing a Complaint, that Mr. Hatt was going to continue to cut trees. His reply letter to me indicated that he had cut down trees earlier without obtaining approval from Plaintiff. My response letter to him is attached as Exhibit "D".

b. The difficulty. This litigation was for more difficult due to Defendants' position that Plaintiff had no authority to enforce the Declaration of Restrictions, the Declaration of Restrictions had not been extended and that Plaintiff didn't exist. Had Defendants merely contested the value of the tree, the dispute would have been resolved far more inexpensively. 90% of the attorney's fees could have been avoided. Had Defendants presented the photographs of the tree and other evidence about the size of the tree, there is no doubt the dispute never would have gone to trial. However, because Defendants chose to challenge Plaintiff's authority granted in the Declaration of Restrictions, Plaintiff had to spend over $30,000.00 to confirm that it had the authority to protect the forest and protect the neighborhoods in Arrowhead Woods.

c. The skill necessary to litigate. This matter required persistence and a high degree of skill in real estate, Homeowners Association law, equitable servitudes, and litigation. Representation of Homeowners Associations and equitable servitudes is often considered to be a specialty.

d. The attention given. The attention given is shown by the time spent, 145 hours, including two days of trial at $215.00 an hour, There was approximately 56 hours of secretarial time billed at $50.00 an hour.

e. The success of the attorney. The Plaintiff was successful. This was the first Complaint filed after the extension of Declaration of Restrictions was recorded. The Defendants chose to litigate Plaintiff's authority to enforce the Declaration of Restrictions and the extension of the Declaration of Restrictions. Although the amount of damages was not awarded as requested by Plaintiff, Plaintiff is still the prevailing party since it was awarded damages and its authority to enforce the Declaration of Restrictions was upheld. Had the Defendants been successful in invalidating the extension of the Declaration of

Restrictions, Plaintiff may not have been able to enforce Declaration of Restrictions over thousands of properties in Arrowhead Woods. The quality of life, the forest, and the quality of residences in Arrowhead Woods would have been severely degraded and property owners would have lost millions, if not tens of millions or hundreds of millions in value. To defend the forest, and hundreds of millions of dollars in property value; attorney's fees of $33,000 is not excessive.

f. The attorney's learning, age, and experience: I have been practicing law for over thirty years, almost entirely in civil law. Approximately 40% of my practice is related to real estate. I have been representing Plaintiff since 1990. I have much experience in equitable servitudes. I have represented at least ten homeowners associations in the Lake Arrowhead area. The eight to ten ones I haven't represented, I have engaged in either litigation or claims against them while representing home owners. It was necessary to have an attorney experienced in real estate and knowledgeable about equitable servitudes to litigate this matter because it involved the continued existence of Plaintiff.

g. The intricacies and importance of the litigation. The litigation was literally life or death for Plaintiff. The Plaintiffs had no choice but to establish their right to continue to enforce the Declaration of Restrictions. There is another action pending. In this action, as shown by Exhibit 44, the Defendants sought to publicize their battle over Plaintiff's authority. Had Defendants been successful, they would have surely publicized their victory and Plaintiff's ability to enforce the Declaration of Restrictions would have been severely damaged, if not ended.

h. Labor and necessity for skilled legal training. The Plaintiff needed a skilled litigator with experience in equitable servitudes, real estate and civil litigation to defend its authority to enforce the Declaration of Restrictions.

i. The time consumed. The time consumed was about 145 hours of attorney time and 56 hours of secretarial time. This was not a case that was over-litigated. No depositions were taken. Plaintiff had to defend motions to bifurcate. The Defendants served notices to appear and then withdrew them after Plaintiff began preparing motions to quash. The Defendants contested every possible issue; including Plaintiff's authority to enforce the Declaration of Restrictions and existence. Had the Defendants only contested the value of the tree, the litigation would have cost far less and never would have gone to trial.

5. My hourly rate to Plaintiff, $215 per hour, is very reasonable and modest. It is less than other attorneys of similar experience in the Inland Empire charge for representation in similar matters.

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6. Attached as Exhibit "E" is a copy of the transcript of the Court's ruling.

I declare under penalty of perjury that the foregoing is true and correct, executed on this 6th day of October, 2015 at Lake Arrowhead, California.

DATED: October 6, 2015 THE LAW OFFICES OF JOHN G. WURM

By: _____

JOHN G. WURM
Attorneys for Plaintiff Arrowhead
Woods Architectural Committee, Inc.,
A California corporation

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

November 23, 2013

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 18653

Professional Services

Date	Description	Hrs/Rate	Amount
10/29/2013	Review Hatt letter	0.20 215.00/hr	43.00
10/31/2013	Letter to Hatt	0.80 215.00/hr	172.00
	Prepare letter to clerk and check	0.20 50.00/hr	10.00
11/1/2013	Transcribe dictation; revise letter; photocopying; file organization	1.15 50.00/hr	57.50
11/14/2013	Telephone call with escrow, e-mail client - Schule	0.30 215.00/hr	64.50
11/15/2013	Telephone call with Schule	0.10 215.00/hr	21.50
11/16/2013	Preparation of dismissal and withdraw Lis Pendis	0.40 215.00/hr	86.00
11/18/2013	Prepare Dismissal without Prejudice; revise same; revise Notice of Withdrawal	0.40 50.00/hr	20.00
	Telephone call with Schule and e-mail client	0.20 215.00/hr	43.00
11/19/2013	Prepare letter to Hatt; revise same; gather enclosures; package and mail letter	0.40 50.00/hr	20.00

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

December 24, 2013

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 18684

Professional Services

Date	Description	Hrs/Rate	Amount
11/25/2013	Package and mail Request for Dismissal to Court	0.05 50.00/hr	2.50
	Prepare letter to R. Hammond; prepare Acknowledgment of Satisfaction of Judgment; telephone call to R. Hammond	0.20 50.00/hr	10.00
12/2/2013	Transcribe dictation; revise letter	0.40 50.00/hr	20.00
	Photocopy and mail correspondence; file organization	0.10 50.00/hr	5.00
12/3/2013	E-letter to client Hatt .2	0.20 215.00/hr	43.00
12/9/2013	Revise document; prepare Proof of Service and serve document; prepare notarization; notarize document; prepare recorder cover page	0.95 50.00/hr	47.50
12/16/2013	Preparation of complaint Hatt	1.00 215.00/hr	215.00
12/17/2013	Revise Complaint and ancillary documents	1.10 50.00/hr	55.00
12/18/2013	Revise document	0.20 50.00/hr	10.00
	Revise complaint	0.40 250.00/hr	100.00

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

January 25, 2014

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 18719

Professional Services

Date	Description	Hrs/Rate	Amount
12/26/2013	Order property profile; prepare and revise letter	0.60 50.00/hr	30.00
	Prepare Summons & Complaint and ancillary pleadings for mailing	0.05 50.00/hr	2.50
12/27/2013	Order property profile; prepare and revise letter	0.60 50.00/hr	30.00
	Revise letter; search out enclosures; package and mail	0.35 50.00/hr	17.50
12/30/2013	E-lett[redacted]	0.10 215.00/hr	21.50
	Prepare exhibits for complaint	0.15 50.00/hr	7.50
	Prepare file index; organize file	0.15 50.00/hr	7.50
1/6/2014	Package Summons & Complaint and ancillary documents; photocopying and mailing	0.20 50.00/hr	10.00
	Fax [redacted]	0.30 215.00/hr	64.50
1/7/2014	E-mail to S. Lippert; extensive file organization	0.40 50.00/hr	20.00

Date	Description	Hrs/Rate	Amount
1/14/20	[redacted] letters with client - Aplen	0.80 215.00/hr	172.00
1/16/2014	Prepare package to County Recorder; revise document; photocopy and mail package	0.70 50.00/hr	35.00
	Preparation of notice pendency Hatt .1	0.10 215.00/hr	21.50
1/17/2014	Package and mail documents to County Recorder; calendaring; file organization and indexing	0.35 50.00/hr	17.50
1/21/2014	[redacted] e letter Murra and client	0.20 215.00/hr	43.00
1/22/2014	[redacted] Review client email .4, prepare letter Murra .5	0.90 215.00/hr	193.50
1/23/2014	Transcribe dictation	0.20 50.00/hr	10.00
	For professional services rendered	6.15	$703.50

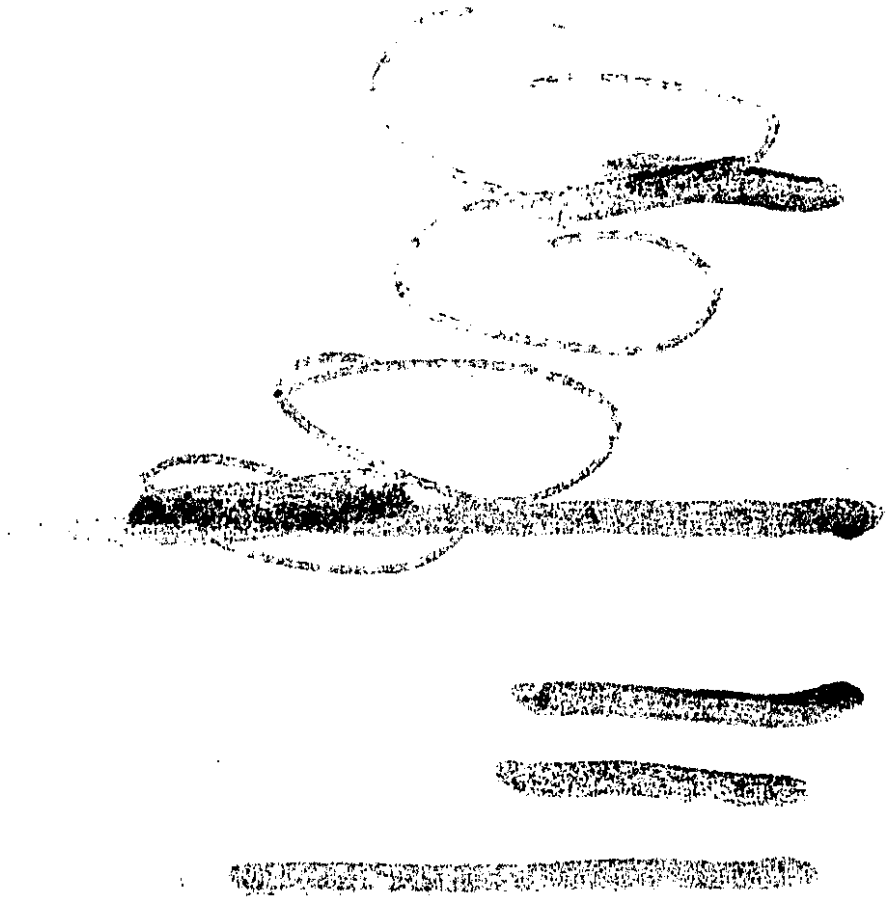
Additional Charges :

Date	Description	
12/27/2013	Copying cost	17.00
	Postage	3.84
1/9/2014	Copying cost	1.40
	Copying cost	12.40
	Postage	2.58
1/24/2014	Copying cost	5.20
	Postage	7.23
1/25/2014	Process Service. Hatt	100.00
	Recording Fee Notice Pendency Hatt	30.00
	Total additional charges	$179.65
	Total amount of this bill	$883.15
	Previous balance	$1,349.84

Date	Description	Hrs/Rate	Amount
4/2/2014	Revise second letter; package and mail	0.20 50.00/hr	10.00
4/7/2014	Review Serenity letter .2, phone call from Roberts .1	0.30 215.00/hr	64.50
4/8/2014	Transcribe dictation; prepare declaration of John Wurm; calendaring; revise documents (.85 - AWAC vs. Hatt); transcribe dictation (.40 - AWAC vs. Serenity)	1.25 50.00/hr	62.50
	Letter to attorney	1.40 215.00/hr	301.00
4/9/2014	Revise documents; gather and attach exhibits; serve documents; prepare letter to court clerk (.75 - AWAC vs. Hatt); revise letter (.35 - AWAC - Serenity)	1.10 50.00/hr	55.00
	Revise letter to Serenity attorney	0.20 215.00/hr	43.00
4/10/2014	AWAC General: revise letter (.20); AWAC Hatt: photocopying; send documents to Court.; file organization (.30)	0.50 50.00/hr	25.00
4/16/2014	Prepare letter to clerk with Request for Entry ... file organization	0.15 50.00/hr	7.50
4/17/2014	Order property profile; prepare Complaint; print	0.35 50.00/hr	17.50
4/18/2014	Revise complaint Murra .3	0.30 215.00/hr	64.50
4/21/2014	E-letter to client re Moller	0.10 215.00/hr	21.50
4/22/2014	e-letters with client .1, prepare letter to attorney .6 (Moller)	0.80 215.00/hr	172.00
	For professional services rendered	9.75	$1,098.00

Additional Charges :

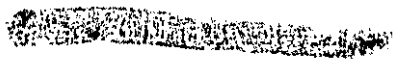
Date	Description	
3/27/2014	Copying cost	20.60
	Postage	0.48
4/2/2014	Copying cost	2.00
4/8/2014	Copying cost	1.20

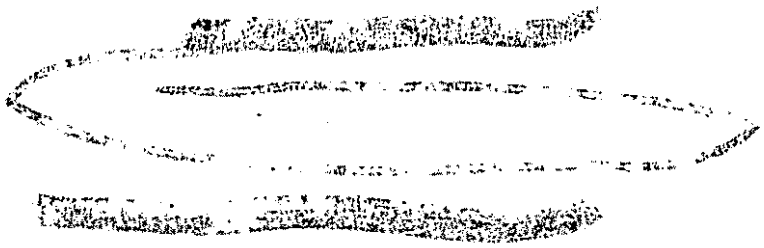


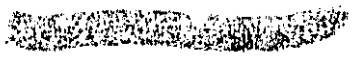
Date	Description	Hrs/Rate	Amount
5/7/2014	File organization (Hatt - .05; Gorrell - .05)	0.10 50.00/hr	5.00
5/8/2014	Review file re status .1,	0.10 215.00/hr	21.50
5/9/2014	E-letter to defendant	0.10 215.00/hr	21.50
5/12/2014	Prepare letter to H. Murra; revise forms and letter; extensive photocopying; packaging and mailing	1.35 50.00/hr	67.50
5/14/2014	File organization; update index; memo to J. Wurm	0.20 50.00/hr	10.00
5/19/2014	E-letter to client and letter to Murra	0.20 215.00/hr	43.00
5/20/2014	Preparation of default documents - Hatt	1.20 215.00/hr	258.00
5/21/2014	Revise letter to H. Murra; package and mail; file organization	0.15 50.00/hr	7.50
5/22/2014	Revise/prepare documents	1.10 50.00/hr	55.00
	Revise default documents - Murra	0.30 215.00/hr	64.50
5/23/2014	Revise documents; scan and e-mail to S. Lippert	0.80 50.00/hr	40.00
	Revise documents - Murra	0.20 215.00/hr	43.00
	For professional services rendered	10.35	$963.50

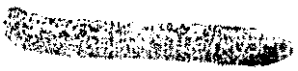
Additional Charges :

Date	Description	
4/25/2014	Copying cost	2.00
	Postage	1.17
	Postage	6.48
5/5/2014	Copying cost	2.00









Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

June 23, 2014

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 18867

Professional Services

Date	Description	Hrs/Rate	Amount
5/28/2014	e-letter to client re trees	0.40 215.00/hr	86.00
6/3/2014	Prepare service of process packages; file organization; package and mail documents	0.35 50.00/hr	17.50
	Telephone call with opposing Attorney - Hatt	0.10 215.00/hr	21.50
6/7/2014	Preparation of withdrawal of default Hatt	0.10 215.00/hr	21.50
6/9/2014	Prepare document and Proof of Service	0.15 50.00/hr	7.50
	prepare discovery Murra 1.0., phone call Stacey .1	1.10 215.00/hr	236.50
6/10/2014	Send e-mail to J. Wurm; serve document; prepare letter to clerk; revise same	0.20 50.00/hr	10.00
	Transcribe dictation	0.65 50.00/hr	32.50
	Transcribe 3 discovery documents from dictation	0.65 50.00/hr	32.50
6/11/2014	Preparation of Trial Setting Statement Hatt .1, revise discovery 1.0	1.10 215.00/hr	236.50

Date	Description	Hrs/Rate	Amount
6/12/2014	Revise document; serve, package, and mail; prepare letter to clerk	0.50 50.00/hr	25.00
6/13/2014	Transcribe dictation; revise forms; prepare Requests for Admission for Genuineness of Documents	1.30 50.00/hr	65.00
	Package and mail documents to the Court	0.05 50.00/hr	2.50
6/16/2014	Revise documents; assemble exhibits (AWAC vs. Murra)	1.45 50.00/hr	72.50
	Revise discovery	0.30 215.00/hr	64.50
6/17/2014	Organize file; update index (AWAC v. Hatt)	0.10 50.00/hr	5.00
	Photocopy, package and mail; prepare multiple documents for service; prepare letter to client; serve documents; package and mail; extensive photocopying; indexing and file organization; calendar (AWAC v. Murra)	1.70 50.00/hr	85.00
	Revise discovery Murra	0.20 215.00/hr	43.00
	For professional services rendered	10.40	$1,064.50

Additional Charges :

Date	Description	
6/4/2014	Copying cost	20.60
	Copying cost	20.60
	Postage	2.24
6/12/2014	Copying cost	4.80
	Postage	1.44
6/17/2014	Copying costs	60.80
	Postage	13.40
	Total additional charges	$123.88
	Total amount of this bill	$1,188.38
	Previous balance	$1,086.22

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

July 26, 2014

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 18892

Professional Services

Date	Description	Hrs/Rate	Amount
6/26/2014	Preparation of stipulation Hatt	0.20 215.00/hr	43.00
6/27/2014	Prepare letter to Hatts; revise documents	0.25 50.00/hr	12.50
6/30/2014	Assemble, package, and mail documents; scan and email documents; extensive file organization and indexing	0.80 50.00/hr	40.00
7/11/2014	Court Appearance	2.00 215.00/hr	430.00
7/12/2014	Preparation of notice of ruling	0.10 215.00/hr	21.50
7/14/2014	Transcribe dictation of Notice of Ruling; prepare Proof of Service; prepare letter to client; serve document; package and mail; update file index	0.40 50.00/hr	20.00
7/16/2014	Review discovery [redacted]	0.10 215.00/hr	21.50
7/21/2014	Transcribe dictation; revise; package and mail; file organization	0.25 50.00/hr	12.50
7/22/2014	Update index	0.05 50.00/hr	2.50
7/24/2014	Review defendants discovery response, research and prepare letter to attorney [redacted]	1.00 215.00/hr	215.00

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

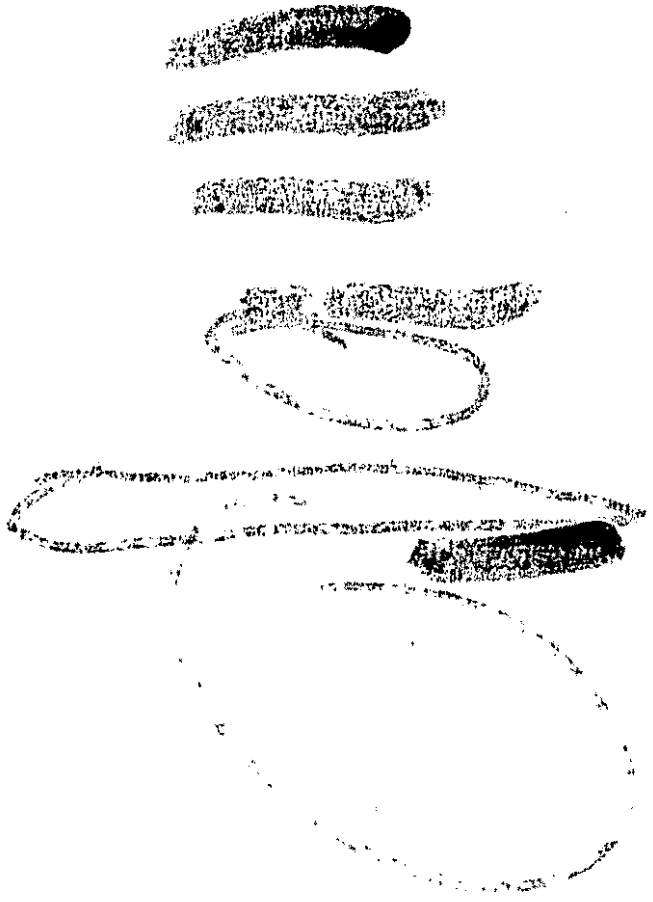
October 24, 2014

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 18973

Professional Services

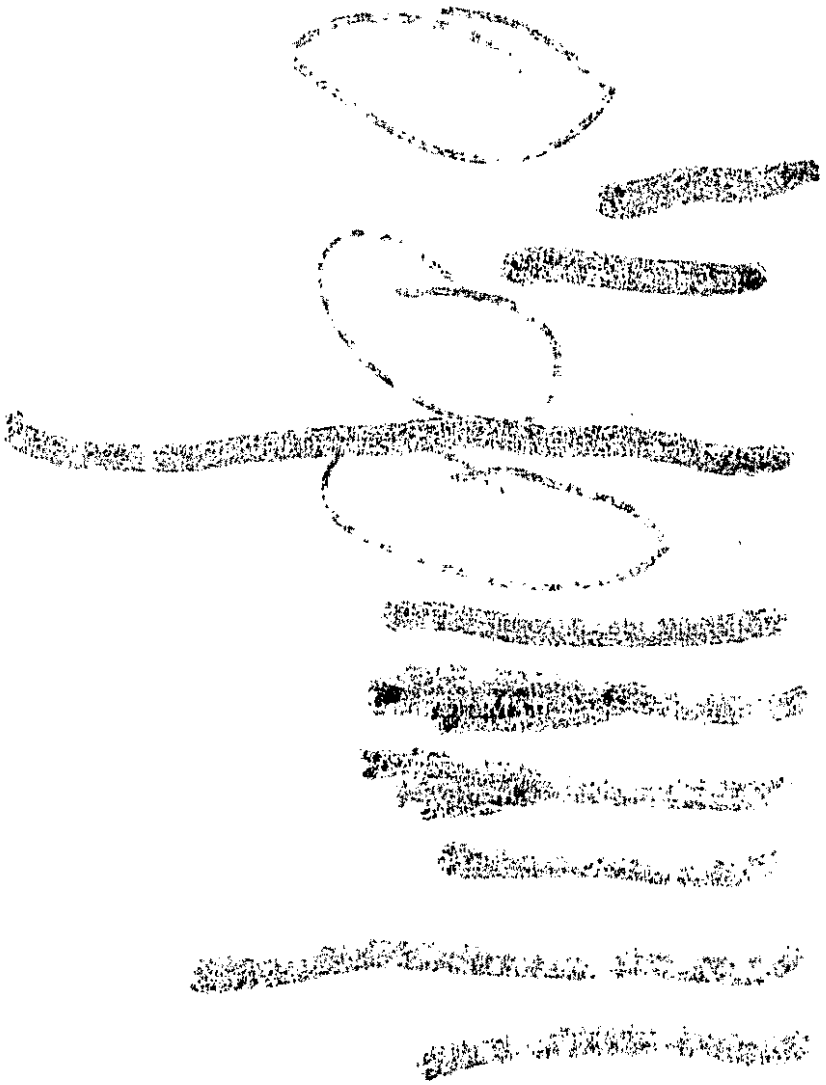
Date	Description	Hrs/Rate	Amount
9/25/2014	Preparation of Plea[redacted]	1.87 50.00/hr	93.33
9/29/2014	Revise discovery response Murra[redacted]	0.20 215.00/hr	43.00
	Preparation of pleadings - Murra[redacted]	1.08 50.00/hr	54.17
10/1/2014	Conference with client - Murra[redacted]	0.50 215.00/hr	107.50
10/3/2014	Secretary time - Organize File Hatt	0.25 50.00/hr	12.50
10/7/2014	Preparation of case management statement 2 - Murra, prepare case management statement and discovery 1.0 - Hatt	1.20 215.00/hr	258.00
	Prep[redacted]	0.30 50.00/hr	15.00
10/8/2014	Revise Hatt discovery	0.40 215.00/hr	86.00
	Revise Discovery Response - Hatt	2.00 50.00/hr	100.00
10/9/2014	Revise discovery Hatt	0.30 215.00/hr	64.50



Date	Description	Hrs/Rate	Amount
10/9/2014	Revise - Response to Hatt, Proof of Service	1.42 50.00/hr	70.83
10/11/2014	E-letter to Murra	0.10 215.00/hr	21.50
10/13/2014	Letter to Defendant Murra	0.20 215.00/hr	43.00
	Revise Special Interrogatories - Hatt	0.73 50.00/hr	36.67
10/14/2014	e-letter to defendant - Murra .3, prepare stipulation and letter .4	0.70 215.00/hr	150.50
	Revise Responses - Mailing - Hatt	1.17 50.00/hr	58.33
10/15/2014	Revise Murra docs, organize file	0.90 50.00/hr	45.00
10/17/2014	Preparation motion	2.00 215.00/hr	430.00
	Revise Interrogatories	0.83 50.00/hr	41.67
10/21/2014	Revise motion - Murra	1.00 215.00/hr	215.00
10/22/2014	Telephone call with opposing Attorney - Murra	0.60 215.00/hr	129.00
10/24/2014	Court Appearance Murra	2.50 215.00/hr	537.50
	For professional services rendered	20.25	$2,613.00

Additional Charges :

Date	Description	
10/24/2014	Court filing fees motion Murra	90.00
	Total additional charges	$90.00
	Total amount of this bill	$2,703.00
	Previous balance	$731.00



Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

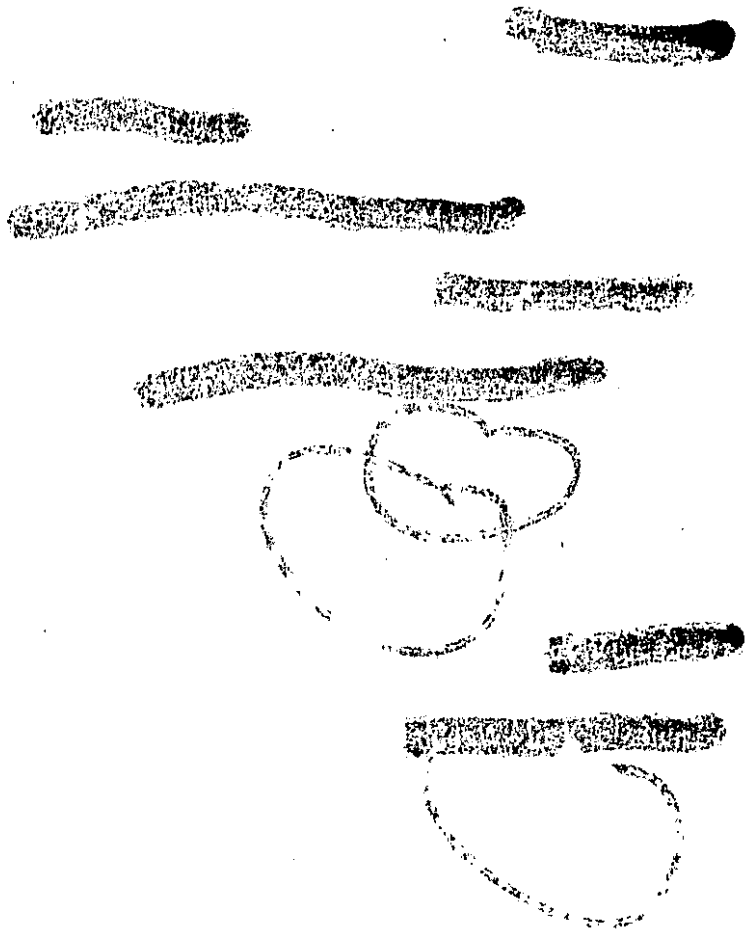
November 24, 2014

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19004

Professional Services

Date	Description	Hrs/Rate	Amount
10/21/2014	[redacted] Revise Points and Authorities, JGW Decl. Motion to Compel	0.72 50.00/hr	35.83
10/22/2014	Revise Points and Authorities, Prepare [redacted] Murra	2.97 50.00/hr	148.33
10/23/2014	Secretary time. [redacted] Motion to Compel to Tim Hiff - Murra	0.15 50.00/hr	7.50
11/4/2014	e-letter to client Murra	0.10 215.00/hr	21.50
11/8/2014	Review client email and file, email client 4 - Webb	0.40 215.00/hr	86.00
11/10/2014	Court Appearance - Hatt	2.30 215.00/hr	494.50
11/11/2014	e-letter to client and p notice - Hatt	0.20 215.00/hr	43.00
11/13/2014	Letter to Webb	0.50 215.00/hr	107.50
11/14/2014	e-letter to client - Webb	0.10 215.00/hr	21.50
11/16/2014	E-letter to client Hatt	0.10 215.00/hr	21.50



Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

December 27, 2014

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19036

Professional Services

Date	Description	Hrs/Rate	Amount
11/12/2014	Preparation - Notice of trial Setting - Hatt	0.12 50.00/hr	5.83
11/13/2014	Send Notice - Proof of Service to Court, Hatts	0.17 50.00/hr	8.33
11/14/2014	Draft [redacted]	0.45 50.00/hr	22.50
11/29/2014	e-letter to client re Hatt	0.40 215.00/hr	86.00
12/2/2014	Telephone call [redacted] sing Attorney Murr[redacted]	0.30 215.00/hr	64.50
12/3/2014	Letter to Hatt re discovery	1.00 215.00/hr	215.00
12/4/2014	e-etter to client re subpoena .1, revise letter to Hatt .3	0.40 215.00/hr	86.00
	Preparation of settlement brief	0.70 215.00/hr	150.50
	Draft letter to Hatt	0.60 50.00/hr	30.00
12/5/2014	Prepare Mediation Brief - Hatt	0.78 50.00/hr	39.17

Date	Description	Hrs/Rate	Amount
12/8/2014	Telephone call with opposing Attorney - Murra .1.	0.10 215.00/hr	21.50
12/9/2014	Review file and email client - Murra	0.30 215.00/hr	64.50
12/11/2014	Phone call from attorney - Murra .1, letter to Hatt .3	0.40 215.00/hr	86.00
12/16/2014	Hatt - Revise Brief, Proof of Service, Prepare Exhibits, Revise Notice to Compel	0.32 50.00/hr	15.83
	Review documents .4, phone call Mike O. .2, email client .3 Egrari, prepare notice of discovery motion .4 Egrari	1.30 215.00/hr	279.50
12/19/2014	Review Hatt discovery response .2	0.20 215.00/hr	43.00
12/22/2014	Research title online, email client Egrari	0.40 250.00/hr	100.00
12/23/2014	E-letter to client Murra.	0.10 215.00/hr	21.50
	Letter to Egrari	0.80 215.00/hr	172.00
	For professional services rendered	8.84	$1,511.66
	Previous balance		$1,030.16
	Accounts receivable transactions		
12/5/2014	Payment - thank you. Check No. 5013		($1,030.16)
	Total payments and adjustments		($1,030.16)
	Balance due		$1,511.66

Law Offices of John G. Wurl

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

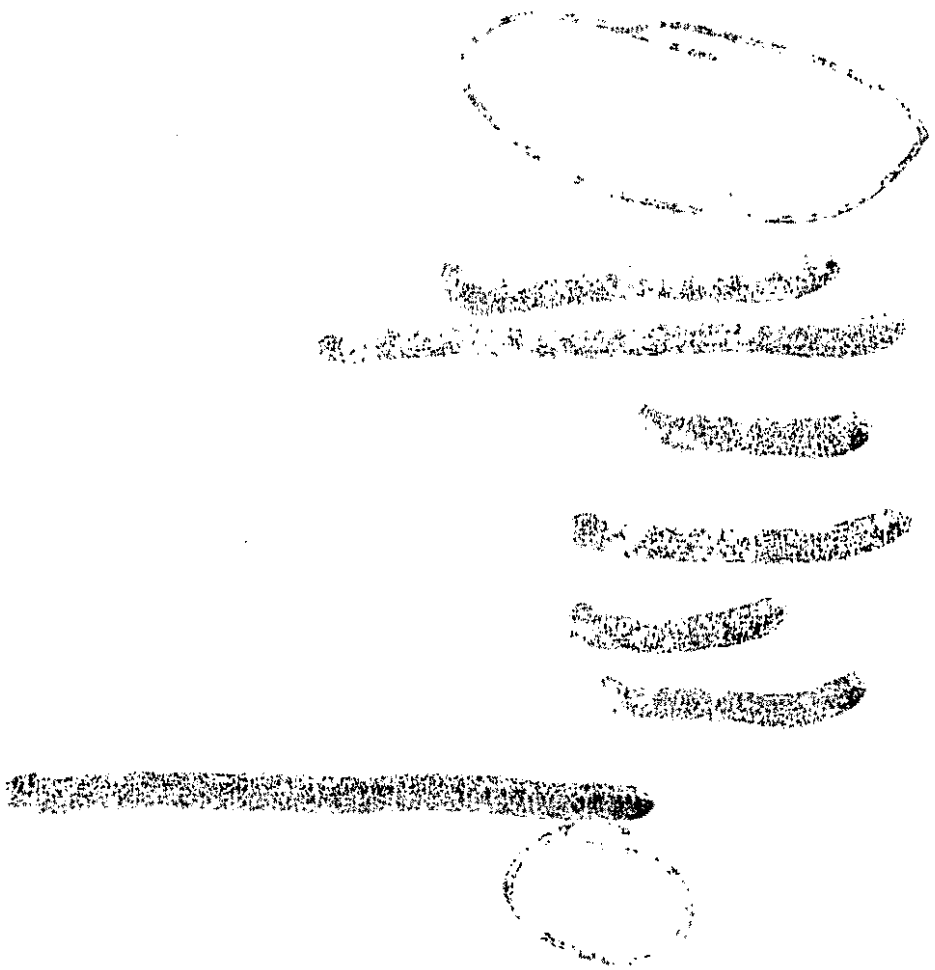
January 24, 2015

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19066

Professional Services

Date	Description	Hrs/Rate	Amount
12/17/2014	Hatt-Preparation of pleadings - Set Date for Notice, Proof of Service w/ Mediation to Hatts	0.78 50.00/hr	39.17
12/22/2014	Hatt - Secretary time. Call Court to remove Motion to Compel	0.30 50.00/hr	15.00
12/24/2014	Egrari - Draft letter to Egrari	0.50 50.00/hr	25.00
12/26/2014	Naraghi - Secretary time. Order Property Profile	0.02 50.00/hr	0.83
	Egrari - letter	0.28 50.00/hr	14.17
12/29/2014	Egrari - Revise Letter	0.12 50.00/hr	5.83
12/30/2014	Draft letter to Naraghi	0.07 50.00/hr	3.33
1/2/2015	Research Naraghi	0.30 215.00/hr	64.50
1/5/2015	E-letters to client re: open tree cutting case .1 and Nadelhorn/Egrari .1	0.20 215.00/hr	43.00
1/6/2015	Telephone call with Gail F	0.20 215.00/hr	43.00



Date	Description	Hrs/Rate	Amount
1/8/2015	Court Appearance 3.7, phone call client .2 - Hatt	3.90 215.00/hr	838.50
1/17/2015	E-lltter to attorney .2, conference attorney .3, email client .1 - Hatt	0.60 215.00/hr	129.00
1/22/2015	Court Appearance Hatt	2.00 215.00/hr	430.00
12/23/2015	Hatt - Proof of Service, Motion to Compel off Calendar - Hatt	0.12 50.00/hr	5.83
	For professional services rendered	9.39	$1,657.16
	Previous balance		$1,511.66
	Accounts receivable transactions		
1/2/2015	Payment - thank you. Check No. 5029		($1,511.66)
	Total payments and adjustments		($1,511.66)
	Balance due		$1,657.16

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

February 23, 2015

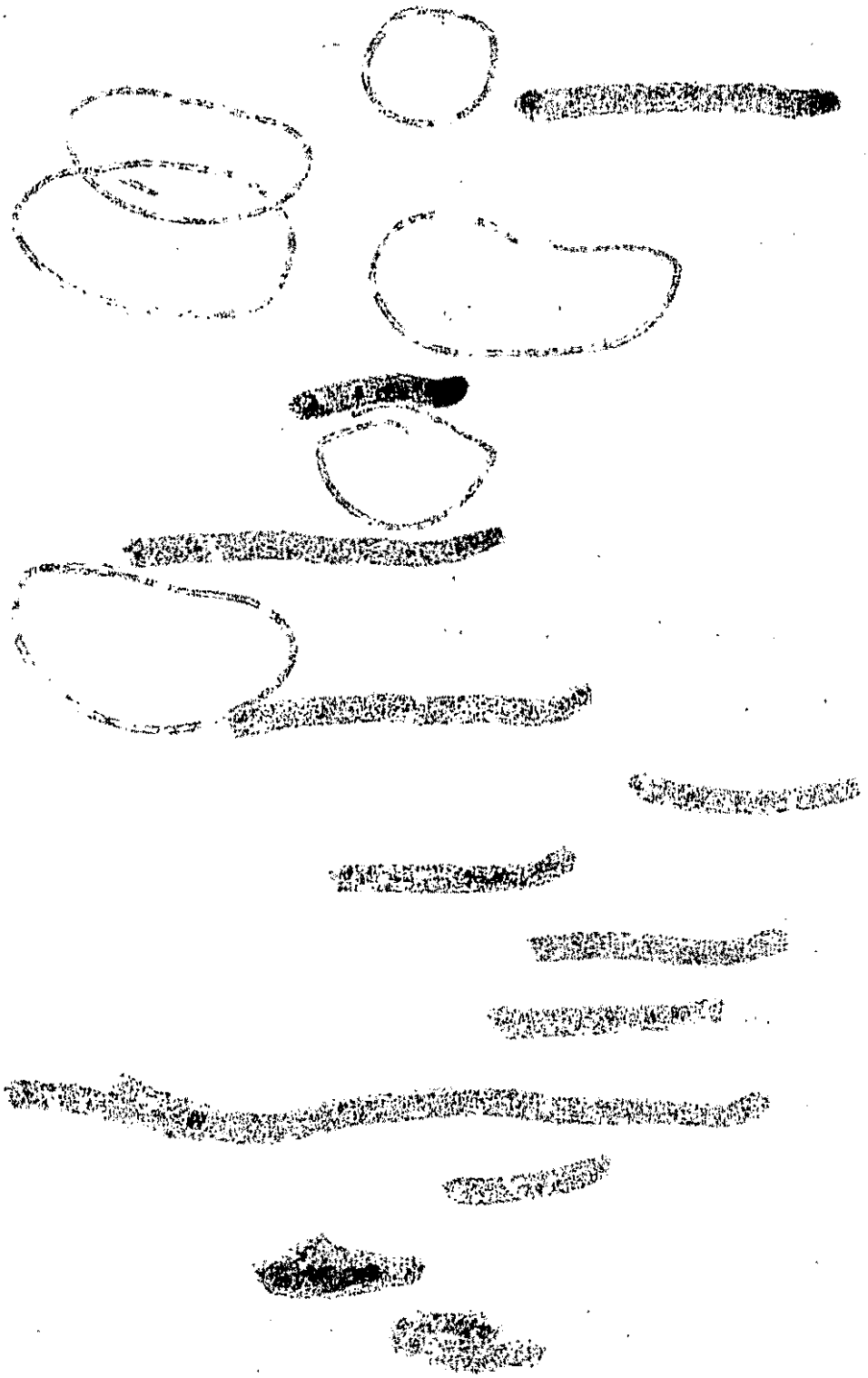
Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19120

Professional Services

Date	Description	Hrs/Rate	Amount
1/28/2015	Telephone call with owner nadelhorn & email Stacey [redacted]	0.40 215.00/hr	86.00
2/2/2015	Letter to owner re nadelhorn	0.60 215.00/hr	129.00
2/6/2015	Revise letter nadelhorn	0.10 215.00/hr	21.50
	Letter to client re nadelahorn	0.10 215.00/hr	21.50
	Egnar - Revise ltr to Manfredi (Forum)	0.38 50.00/hr	19.17
	Naraghi - Full Reconveyance, Substitution of Trustee	0.42 50.00/hr	20.83
2/9/2015	Preparation of First Amended Complaint & stipulation Hatt	0.50 215.00/hr	107.50
2/12/2015	Murra - Revise Case Management Statement	0.20 50.00/hr	10.00
	Preparation of case management conference statement - Murra	0.10 215.00/hr	21.50
2/13/2015	Hatt - Revised ltr, revised stipulation and order for leave, First Amended Complaint	0.50 50.00/hr	25.00

Date	Description	Hrs/Rate	Amount
2/13/2015	Preparation of statutory settlement offer Hatt .2 prepare substitution of trustee and [redacted]	0.60 215.00/hr	129.00
	index file, mailed stipulation Order to Leave to Timothy Brown - Hatt	0.31 50.00/hr	15.69
	Revised Case Management Statement, Proof of Service, Filed with court - Hatt	0.75 50.00/hr	37.36
	Drafted Statutory Settlement Offer - Hatt	0.67 50.00/hr	33.33
2/14/2015	Preparation of motion amend complai[redacted]	4.00 215.00/hr	860.00
2/16/2015	Draft POS for Statutory Settlement Offer - Hatt	0.20 50.00/hr	10.00
	Revised Notice of Motion, Order, [redacted] Amended Complaint - Murra	3.48 50.00/hr	174.17
2/17/2015	Secretary time. Mailed to Timothy Brown, Scan and emailed to Stacey - Hatt	0.35 50.00/hr	17.50
	Revised First Amendment [redacted]	4.12 50.00/hr	205.83
	[redacted]	0.50 215.00/hr	107.50
2/18/2015	Revised First Amended Co[redacted]	0.80 50.00/hr	40.00
	Revised [redacted]	0.98 50.00/hr	49.17
	Revised pleadings - Murra[redacted]	0.95 50.00/hr	47.50
	Revise m[redacted]	0.70 215.00/hr	150.50
2/19/2015	Revised Pleadings , POS - Murra[redacted]	0.37 50.00/hr	18.33
	Revised pleadings, Drafted letter of Stipulat[redacted]	0.40 50.00/hr	20.00
	Revised pleadings then mailed et[redacted]	0.42 50.00/hr	20.83



Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

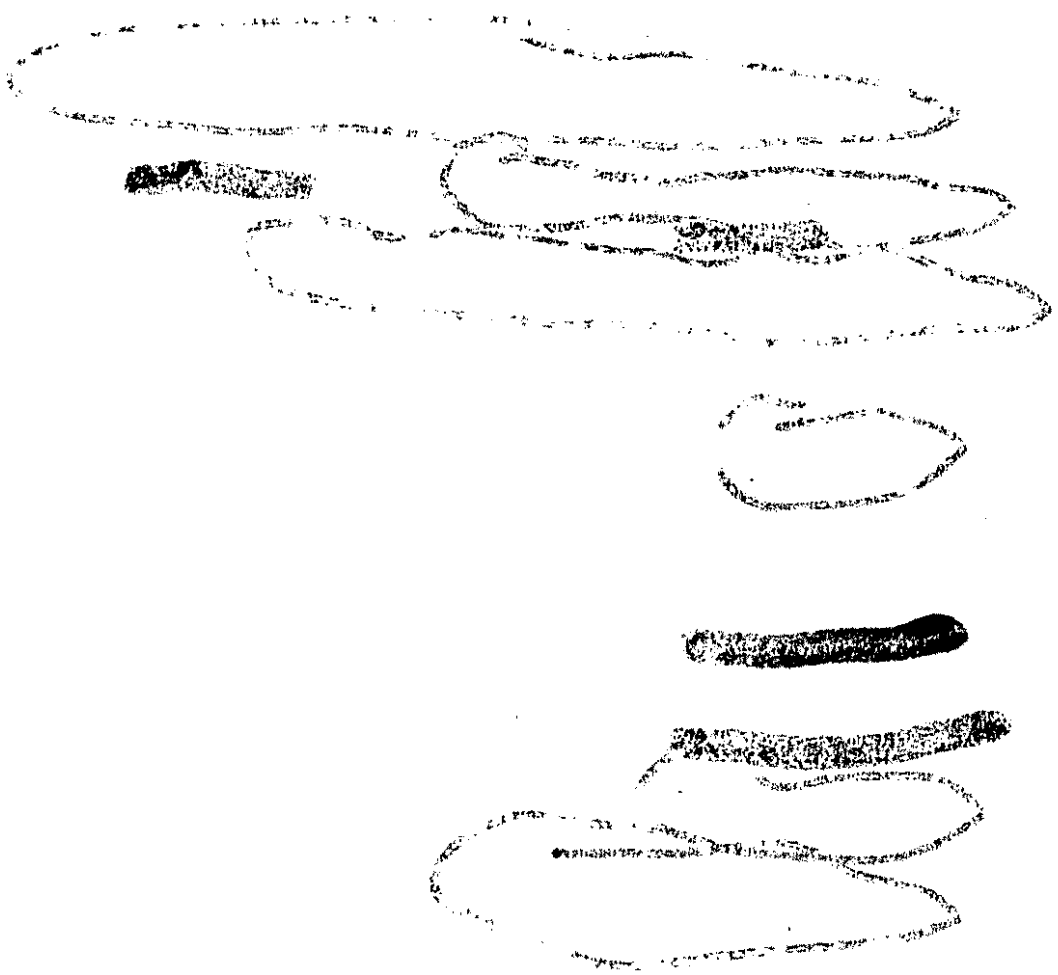
March 25, 2015

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19127

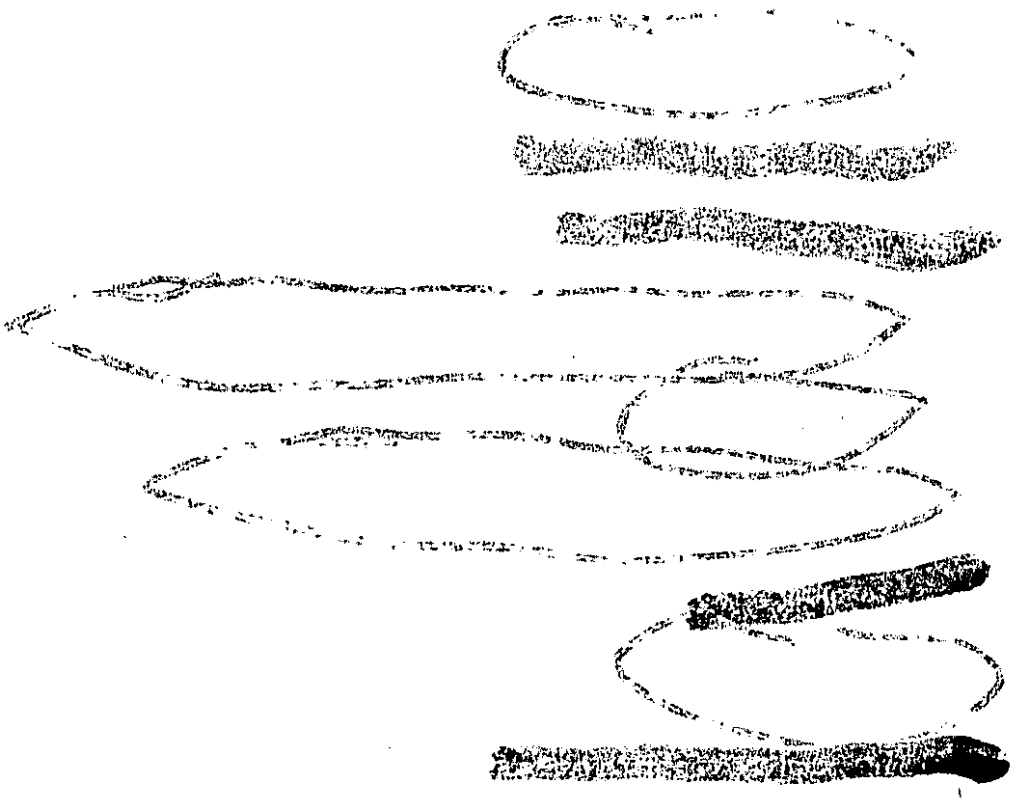
Professional Services

Date	Description	Hrs/Rate	Amount
2/24/2015	Revised 1st Amended Complaint, Created Order for Leave, Notice for Motion to Leave, Declaration, Memorandum	0.42 50.00/hr	20.83
	Preparation of motion amend complaint Hatt 1.6, email client, phone call Bryan - Murra .2	1.80 215.00/hr	387.00
2/25/2015	Revised, Memorandum, Declaration, Order, Motion for Leave	1.08 50.00/hr	54.17
2/27/2015	Revised pleadings	0.67 50.00/hr	33.33
	Revise motion Hatt .2, phone call attorney and prepare letter discovery attorney - Murra .5	0.70 215.00/hr	150.50
3/3/2015	Revised Stipulation and Order for Leave	0.17 50.00/hr	8.33
3/4/2015	Draft [redacted]	0.92 50.00/hr	45.83
3/5/2015	Revised Murra/Beck letter	0.67 50.00/hr	33.33
3/9/2015	Fax letter to client re Hatt	0.10 215.00/hr	21.50
3/10/2015	Research opposition motion bifurcate Hatt	1.00 215.00/hr	215.00



Date	Description	Hrs/Rate	Amount
3/11/2015	Letter to attorney .3, email client - hatt	0.40 215.00/hr	86.00
3/16/2015	Preparation of stipulation - Murra	0.10 50.00/hr	5.00
3/19/2015	Preparation of complaint - Forum	1.60 215.00/hr	344.00
	Preparation of document production .8 review file .2, phone call witness .3 - Hatt	1.30 215.00/hr	279.50
3/20/2015	e-letter to client status Hatt	0.50 215.00/hr	107.50
	Preparation of document production .1, email client .3 - Hatt	0.40 215.00/hr	86.00
	Review complaint - Forum	0.30 215.00/hr	64.50
3/23/2015	E-letter to client Hatt	0.10 215.00/hr	21.50
3/24/201	[illegible] court and record - Forum	2.00 50.00/hr	100.00
	For professional services rendered	14.23	$2,063.82
	Additional Charges :		

Date	Description	
3/25/2015	Court filing fees.Murra - stipulation $20, $90 Hatt, $559 Forum	569.00
	Total additional charges	$569.00
	Total amount of this bill	$2,632.82
	Previous balance	$3,086.71
	Accounts receivable transactions	
3/6/2015	Payment - thank you. Check No. 5054	($3,086.71)
	Total payments and adjustments	($3,086.71)



Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

April 25, 2015

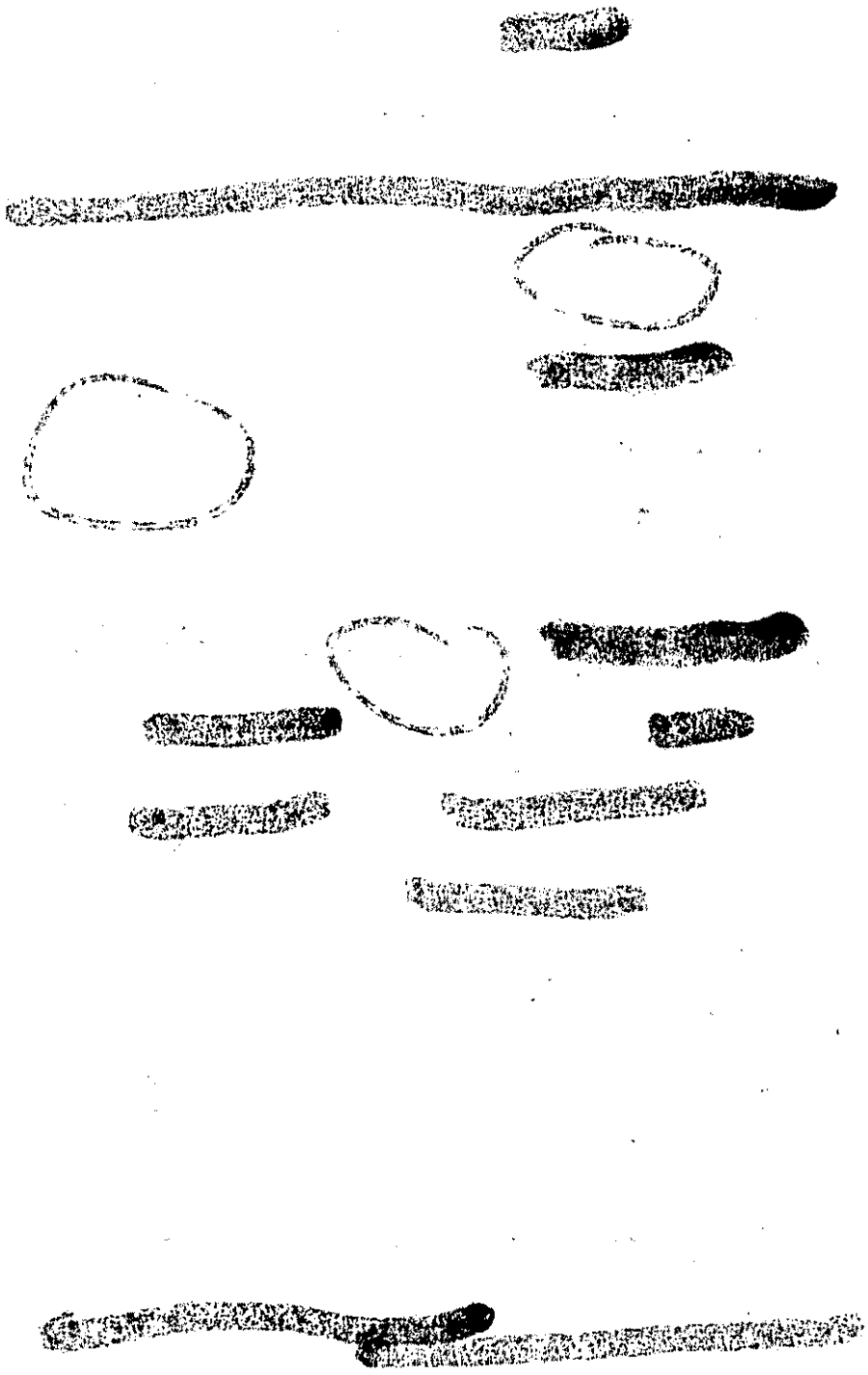
Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19155

Professional Services

Date	Description	Hrs/Rate	Amount
3/27/2015	Preparation of objections to Brown dec motion 2.5	2.30 215.00/hr	494.50
3/30/2015	Preparation of opposition Points and Authorities Hatt 3.0, phone call owner [redacted]	3.10 215.00/hr	666.50
3/31/2015	Preparation of Proof of Service. Hatt	0.17 50.00/hr	8.33
	Preparation of Requests for Admission; revisions to same.	1.00 50.00/hr	50.00
	Letter to attorney re subpoena .2, prepare subpoenas Barley and Fry .3	0.50 215.00/hr	107.50
4/1/2015	Preparation of letter to Shimaza.Hatt	0.25 50.00/hr	12.50
4/2/2015	Revise Requests for Admission. Hatt	0.25 50.00/hr	12.50
	Revise letter to Stephanie Shimazu; revise Requests for Admission (2 sets); Proof of Service.	0.42 50.00/hr	20.83
	Revise Proof of Service; prepare Index.	0.17 50.00/hr	8.33
	Pr[redacted]	0.20 215.00/hr	43.00

Date	Description	Hrs/Rate	Amount
4/2/2015	Preparation of Volume 2 Index.	0.25 50.00/hr	12.50
4/3/2015	Preparation of discove[redacted]	0.20 215.00/hr	43.00
	Preparation of copies of Requests for Admission (two sets) and Form Interrogatories (2 sets).	0.25 50.00/hr	12.50
4/6/2015	Pre[redacted] Requests for Admission Set 2, revise Proof of Service; Form Interrogatories Set 2.	0.50 215.00/hr	107.50
	E-letter to clie[redacted] t re Hatt trial	1.00 215.00/hr	215.00
4/7/2015	e-l,etter to cl[redacted]	0.30 215.00/hr	64.50
4/8/2015	Preparation of expert demand and objections documen[redacted] demand - Hatt	0.50 215.00/hr	107.50
4/9/2015	Secretary time - obtain Property Profile.	0.08 50.00/hr	4.17
	Review letter from attorney, research .5, phone call attorney .3, phone call client .[redacted] n, review property profile and CCR's .2, phone call client .1 .3 Murra, phone call client Hatt .1	1.40 215.00/hr	301.00
4/10/2015	Review ccr[redacted], conference w/ [redacted]	0.50 215.00/hr	107.50
4/11/2015	E-letter to client Forum Nadelhorn .8, email attorney Murra .4	1.20 215.00/hr	258.00
4/13/2015	Review letter from attorney - Forum	0.20 215.00/hr	43.00
4/14/2015	Preparation of pleadings - Responses to Request for Production set One; Demand for Expert Witness Information.	0.75 50.00/hr	37.50
4/15/2015	Preparation of pleadings - Requests for Admission No. 2; Special Interrogatories Set No. 1.	0.33 50.00/hr	16.67
	Revise Requests for Admission, Special Interrogatories.	0.50 50.00/hr	25.00
	Revise Requests for Admission #2; revise Special Interrogatories; Form Interrogatories #2.	0.58 50.00/hr	29.17
	E-letter to attorney and client 1.0, p[redacted] Rich & Rob .4 Forum fax attorney .1 Hatt, revise discovery .2 Murra	1.70 215.00/hr	365.50



Date	Description	Hrs/Rate	Amount
4/16/2015	Revise Demand for Exchange of Expert Witnesses; revise Response to Request for Production Set No. One.	0.25 50.00/hr	12.50
	E-letter to client, Forum	0.20 215.00/hr	43.00
4/20/2015	Revise Form Interrogatories; Special Interrogatories.	0.17 50.00/hr	8.33
4/21/2015	Court Appearance -2.0, email client.1 Hatt,	2.10 215.00/hr	451.50
4/22/2015	Revise Pleading Index.	0.25 50.00/hr	12.50
4/24/2015	Review tree report	0.20 215.00/hr	43.00
	For professional services rendered	21.77	$3,744.83

Additional Charges :

Date	Description	
3/25/2015	Court filing fee [redacted] recording fees $24 - Forum, [redacted] Court fees $90 Hatt	569.00
		NO CHARGE
	Total additional charges	$569.00
	Total amount of this bill	$4,313.83
	Previous balance	$2,632.82
	Accounts receivable transactions	
4/3/2015	Payment - thank you. Check No. 5061	($2,632.82)
4/3/2015	Payment - thank you - "Murra". Check No. 1438	($550.00)
	Total payments and adjustments	($3,182.82)
	Balance due	$3,763.83

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

May 23, 2015

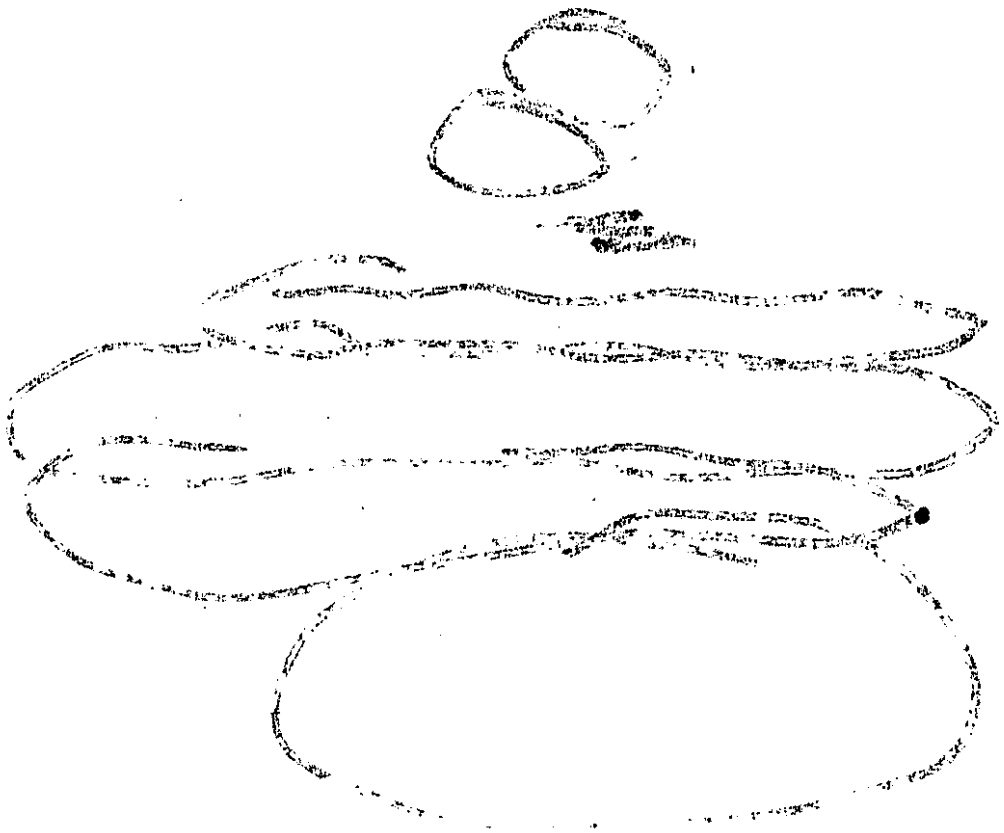
Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19180

Professional Services

Date	Description	Hrs/Rate	Amount
4/27/2015	Email client .1	0.10 215.00/hr	21.50
4/30/2015	Court Appearance	1.90 215.00/hr	408.50
5/4/2015	Court Appearance 1.9, prepare stipulation First Amended Complaint and letter to attorney .5, email client experts .2, email Brad & Mike O. .2, research Hatt experts. .3, phone call G. Barley .1	3.40 215.00/hr	731.00
	Preparation Special Interrogatories, Verification, letter.	0.50 50.00/hr	25.00
5/5/2015	Telephone call with Cal Fire Attorney and prepare letter .4 - Hatt, email cl M[redacted]	0.50 215.00/hr	107.50
5/6/2015	Phone call C. Banner .1 Hatt, prepare 2d amended complaint, letter to attorney and stipulation 2.0	2.10 215.00/hr	451.50
	Preparation of Demand for Exchange.	5.50 50.00/hr	275.00
5/7/2015	Revise Expert Witness information and Special Interrogatories..	0.30 50.00/hr	15.00
5/9/2015	Research Hatt	3.00 250.00/hr	750.00
5/10/2015	Research - Hatt	1.00 215.00/hr	215.00

Date	Description	Hrs/Rate	Amount
5/12/2015	Revise Special Interrogatories.	40.00/hr	NO CHARGE
	Revise response to discovery Hatt	0.20 215.00/hr	43.00
5/14/2015	Telephone call with opposing Attorney Hatt	0.10 215.00/hr	21.50
5/15/2015	E-letters to attorney [redacted]2, , conference witness .2	0.80 215.00/hr	172.00
5/18/2015	Review motion bifurcate .2, phone call CalFire .1 Hatt	0.30 215.00/hr	64.50
5/19/2015	Preparation of Brier Declaration .6, prepare Witness List and Exhibit List 2.0 Hatt	2.60 215.00/hr	559.00
5/20/2015	Preparation and revise Exhibit List and Witness list, review file for trial	2.00 215.00/hr	430.00
5/21/2015	Preparation trial and review file	1.00 215.00/hr	215.00
5/22/2015	Research Hatt	4.00 215.00/hr	860.00
5/23/2015	Preparation of Request Witness Statement	0.10 215.00/hr	21.50
	For professional services rendered	29.40	$5,386.50
	Previous balance		$3,763.83
	Accounts receivable transactions		
5/8/2015	Payment - thank you. Check No. 5082		($3,763.83)
	Total payments and adjustments		($3,763.83)
	Balance due		$5,386.50



Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

June 23, 2015

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19211

Professional Services

Date	Description	Hrs/Rate	Amount
5/23/2015	E-letter to attorney .1, prepare response to motion .4 - Hatt	0.50 215.00/hr	107.50
5/24/2015	Preparation Motion in Liminae ballot 3.8, prepare Brief decl .2	4.00 215.00/hr	860.00
5/25/2015	Preparation of trial Brief - Hatt	2.00 215.00/hr	430.00
5/26/2015	Revise Memo of Points and Authorities; Objections to Declaration; Declaration of John Wurm in Opposition to Motion.	1.67 50.00/hr	83.33
	Revise documents.	0.42 50.00/hr	20.83
	Preparation of pleadings - Motion in Limine.	1.05 50.00/hr	52.50
5/27/2015	Preparation of pleadings - Motion in Limine.	6.33 50.00/hr	316.67
5/28/2015	Preparation of pleadings - Trial Brief.	4.25 50.00/hr	212.50
	Preparation of pleadings - Trial brief dictation	2.50 50.00/hr	125.00
5/29/2015	Preparation of pleadings - Continuation of dictation of Trial Brief	2.25 50.00/hr	112.50

Date	Description	Hrs/Rate	Amount
6/1/2015	Preparation of pleadings - Continuation of dictation of Trial Brief	0.75 50.00/hr	37.50
6/2/2015	Revise trial brief and motion	3.00 215.00/hr	645.00
6/3/2015	Revise Motion in Limine	0.17 50.00/hr	8.33
	Revise Motion in Limine.	3.00 50.00/hr	150.00
6/4/2015	Revise Motion in Limine and Trial Brief.	3.17 50.00/hr	158.33
6/5/2015	Revise Trial Brief and Motion in Limine..	1.33 50.00/hr	66.67
	Revise Trial Brief and Motion in Limine.	4.33 50.00/hr	216.67
	Revise motion and trial brief 1.0	1.00 215.00/hr	215.00
6/6/2015	Revise motion and trial brief	3.00 250.00/hr	750.00
6/7/2015	Revise motion and trial brief	1.00 215.00/hr	215.00
6/8/2015	Telephone call with opposing Attor[redacted]	[redacted]	21.50
6/13/2015	Preparation of Objection to Notice to Appear .4, revise motion in liminae adn brief 2.0, research 1.0	3.40 215.00/hr	731.00
	Research Evidence Code .5, revise motion & brief 1.0, prepare exhibit list .5	2.00 215.00/hr	430.00
6/14/2015	Revise motion in liminae	1.50 215.00/hr	322.50
6/15/2015	Research Hatt	0.50 215.00/hr	107.50
6/16/2015	Preparation of objections and motion re notice to appear, letter to attorney	2.30 215.00/hr	494.50
6/19/2015	Preparation of jury instructions, revise exhibit list and witness list, statement of case, email to attorney 2.2	2.20 215.00/hr	473.00

Date	Description	Hrs/Rate	Amount
6/23/2015	Telephone call with court .1, 6/22, emails witnesses .5, 6/23	0.60 215.00/hr	129.00
	For professional services rendered	58.32	$7,492.33
	Additional Charges :		
Date	Description		
6/20/2015	Witness fee - Barley $275.00, stipulation fee 20.00 Hatt, sitpulation fee $20.00 Murra, certified documents 78.00		383.00
	Total additional charges		$383.00
	Total amount of this bill		$7,875.33
	Previous balance		$5,386.50
	Accounts receivable transactions		
6/5/2015	Payment - thank you. Check No. 5089		($5,386.50)
	Total payments and adjustments		($5,386.50)
	Balance due		$7,875.33

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

July 25, 2015

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19232

Professional Services

Date	Description	Hrs/Rate	Amount
6/24/2015	Conference with client .4, prepare exhibit list 1.0	1.40 215.00/hr	301.00
6/25/2015	Letter to attorney - Hatt	0.20 215.00/hr	43.00
6/28/2015	e-letter to attorney and prepare case management questionai[redacted]	0.30 215.00/hr	64.50
6/29/2015	Phone call fr[redacted]	0.10 215.00/hr	21.50
6/30/2015	Revise Case Management Stat[redacted]	0.75 50.00/hr	37.50
7/1/2015	Phone call from client	0.20 215.00/hr	43.00
7/2/2015	Revise briefs, email clients and attorney	2.00 215.00/hr	430.00
	Preparation of trial exhibit binders 1-100	5.00 50.00/hr	250.00
7/3/2015	Revise motions/brief, exhibit list	3.00 215.00/hr	645.00
7/5/2015	Revise motion/brief, exhibit list, email client	1.00 215.00/hr	215.00

Date	Description	Hrs/Rate	Amount
7/6/2015	[redacted], e-mail client Hatt .2	2.20 215.00/hr	473.00
7/7/2015	Preparation [redacted]	1.00 215.00/hr	215.00
7/12/2015	Preparation questions Ottoson and realtors	3.00 215.00/hr	645.00
7/13/2015	Preparation of discovery [redacted]	1.75 50.00/hr	87.50
	Preparation addlitional Ottoson questions 1.5	1.50 215.00/hr	322.50
7/14/2015	Revise Declaration	0.08 50.00/hr	4.17
	Revise discovery [redacted], prepare Parkinson questions .7 Hatt	1.20 215.00/hr	258.00
7/15/2015	Revise Discovery documents [redacted]	2.00 50.00/hr	100.00
	Preparation questions Taylor .5, prepare Scott questions .5, revise Ottoson and Parkinson questions 1.0	2.00 215.00/hr	430.00
7/16/2015	Preparation Stacey questions 4.0	4.00 215.00/hr	860.00
7/17/2015	Preparation Stacey questions 1.0	1.00 215.00/hr	215.00
7/22/2015	e-letters to witnesses re trial	0.40 215.00/hr	86.00
	For professional services rendered	34.08	$5,746.67

Additional Charges :

Date	Description	
5/1/2015	Copying cost	0.60
	Postage	0.48
5/27/2015	Copying cost	3.80
6/24/2015	Postage	2.49

10635

Law Offices of John G. Wurm

Post Office Box 1875
27321 North Bay Road
Lake Arrowhead, CA 92352

Invoice submitted to:

August 20, 2015

Arrowhead Woods Architectural Committee
Post Office Box 2026
Lake Arrowhead,, CA 92352

Invoice # 19254

Professional Services

Date	Description	Hrs/Rate	Amount
7/26/2015	Revise Stacey questions and email witnesses	1.00 215.00/hr	215.00
7/27/2015	Revise brief and motion	1.00 215.00/hr	215.00
7/28/2015	Conference with Jim T. re testimoney 1.0	1.00 215.00/hr	215.00
	Review listing [redacted] email client	0.20 215.00/hr	43.00
7/30/2015	Court Appearance motion 1.9, email attorney and client .4	2.30 215.00/hr	494.50
8/2/2015	Preparation of stipulation and email client and attorney	0.80 215.00/hr	172.00
8/4/2015	Conference with Parkinson	0.30 215.00/hr	64.50
8/6/2015	Conference with Stacey and Rich 2.0, revise stipulation & exhibit list, email attorney, revise Jim and Rich questions 2.0	4.00 215.00/hr	860.00
8/7/2015	Revise Rich q's	0.50 215.00/hr	107.50
8/11/2015	Revise Stacey & Bob's questions .5, contact witnesses	0.70 215.00/hr	150.50

Date	Description	Hrs/Rate	Amount
8/13/2015	Conference with Tim Brown	0.20 215.00/hr	43.00
8/17/2015	Conference with Banner	1.00 215.00/hr	215.00
	Conference with Stacey 1.2, conference Carol B. 1.0	2.20 215.00/hr	473.00
8/18/2015	Revise realtor and Stacey questions	2.00 215.00/hr	430.00
8/19/2015	Phone calls witnesses .2, prepare Hatt questions 1.0, conference Clark 1.5, revise briefs/motions .5, conference Stacey 1.0, conference attorney .6	4.80 215.00/hr	1,032.00
8/20/2015	Court Appearance 3.0, email cleints/witnesses .2, conference w/ Bob 1.0	4.20 215.00/hr	903.00
	For professional services rendered	26.20	$5,633.00

Additional Charges :

Date	Description	
8/20/2015	Court filing fees.	25.00
	Total additional charges	$25.00
	Total amount of this bill	$5,658.00
	Previous balance	$5,987.56
	Accounts receivable transactions	
8/7/2015	Payment - thank you. Check No. 5118	($5,987.56)
	Total payments and adjustments	($5,987.56)
	Balance due	$5,658.00

THE LAW OFFICES OF JOHN G. WÜRM

JOHN G. WÜRM
Attorney At Law

November 1, 2013

George Hatt
P.O. Box 3551
Blue Jay, CA 92317

Re: 145 Birchwood Lane, Lot 49, Tract 7891

Dear Mr. Hatt:

I represent Arrowhead Woods' Architectural Committee ("AWAC"). AWAC has provided me their letter to you of October 9, your response letter, and the documentation prepared by Mikael Ottoson regarding the value of the tree which you had cut down. As Mr. Ottoson's report indicates, the value of the tree, after taking into consideration its size, species, condition, and location, was $12,400. Additionally, AWAC expended $369 for Mr. Ottoson's report. After reviewing these documents, I can address your concerns as stated in your letter

You state that your trees were marked for removal by Cal Fire Inspectors and that you, in fact, were ordered to remove the trees. In my experience, Cal Fire Inspectors do not order removal of trees on residential private property in Arrowhead Woods. However, if this did occur, please provide me with the orders or other documentation which the Cal Fire Inspectors gave you. If you received no written documentation from the Cal Fire Inspectors, then provide me with their names, phone numbers, and dates of inspection so that I can contact them to confirm what happened.

You have also questioned under what authority AWAC operates.

I enclose a recorded copy of the "*Declaration of Restrictions*" for your tract. These *Declarations of Restrictions* were extended in 2010. I enclose a copy of the recorded *Certification of Amendment*. AWAC is the successor to the architectural committee. As set forth in the *Declaration*, AWAC has the power to approve or disapprove of removal of trees. Article VII provides that an owner shall not "permit any person to remove, destroy or materially change the shape of any trees growing on said tract without the prior consent of grantor, or its successors and assigns, or the architectural committee acting in its assigned capacity." (Underscore added.) AWAC is the successor to the architectural committee established in the *Declaration of Restrictions*.

Article VII also provides that you are liable for the cost and expense of the removal of any trees. It states the owner "shall pay the cost and expense for the removal of any tree or trees, and indemnify and hold the declarant harmless therefor." The cost to replant the tree and its value are provided in Mr. Ottoson's report at $12,400.

Telephone: 909.337.2557
Fax: 909.336.3697
27321 North Bay Road
Post Office Box 1875
Lake Arrowhead, CA 92352
Email: jwurm@linkline.com

Additionally, the Declaration of Restrictions provides that the authority of the architectural committee may be assumed by any corporation. AWAC has assumed that authority. Article XV provides that AWAC has the right to enforce the Declaration of Restrictions. Article XII(b) provides that, in the event of any violations of the restrictions, AWAC may file a lawsuit for damages. Additionally, in Article XII(d), AWAC is entitled to recover attorney fees for the violation.

As the purchasers of the property, you had constructive notice of the *Declarations of Restrictions* which are a recorded document. Your deed from 2001 indicates that you were informed that your lot was in Tract 7891, which is subject to the *Declaration of Restrictions*. Additionally, it is well known in Lake Arrowhead that all tree cutting is subject to AWAC's authority.

While AWAC appreciates the efforts you describe in you letter to maintain a healthy forest, you have by your own admission violated the *Declaration of Restrictions*. AWAC is, therefore, entitled to the $12,400 plus $369 in costs. If you desire, please provide the documentation and information as I requested earlier. Otherwise, send a check to my office issued to AWAC for $12,769.

If I don't receive either the check or the documentation within two weeks of the date of today's letter, I'll assume that you are not going to respond to this letter and that it will be necessary for AWAC to file a lawsuit against you and your wife as the co-owner of the property. While I understand that your wife is ill, because she is the co-owner, she is a required party to any litigation. If a lawsuit is filed, AWAC will be entitled to its court costs and attorney fees. The court costs and attorney fees could easily equal or exceed the value of the tree.

If you wish to discuss this matter, please don't hesitate to contact me.

Very truly yours,

LAW OFFICES OF JOHN G. WÜRM

JOHN G. WÜRM

JGW:nkm
enclosures

November 22, 2013

John G. Wurm
P.O. Box 1875
Lake Arrowhead, CA 92352

Dear Mr. Wurm:

In response to your letter dated November 1, 2013, I have enclosed a letter from my Allstate Insurance agent and an E-mail from my Cal Fire inspector per your request confirming their involvement in this issue. I have also included a copy of the "MAKE YOUR HOME FIRE SAFE" brochure which was given to me by the Cal Fire Inspector, Glenn Barley, to reinforce Cal Fire's general guidelines for maintaining a defensible space around my home.

As I have previously stated, my reason for trimming and cutting down the trees immediately adjacent to my home was not for the purpose of causing damage to our beautiful forest. May I remind you that the Old Fire (2003) burned 336 homes to the ground in the Lake Arrowhead area. And the Grass Valley Fire (2007), also in the Lake Arrowhead area, burned 199 homes to the ground. Insurance companies took quite a hit from those losses, and as a result, tightened up the safety requirements for homes remaining on their insurance plans.

At the same time, Cal Fire waged a campaign to remove the trees in the area suffering from bark beetle infestation. I'm not sure what the arrangement was, but Cal Fire became an active agent in the homeowner's insurance business forcing homeowners to make their homes "fire safe", as the brochure describes. Examine the "100' DEFENSIBLE SPACE" brochure and notice that **NO** trees are within a 30 ft. distance from the structure. Glenn Barley told me that existing trees within the 30 ft. perimeter from the house should have no limbs or branches hanging over the roof of the house.

The cedar tree in question was located a mere 6 ft. from the house, and its limbs projected well over the roof of the house. I have not seen the report from your Certified Arborist, but I do know that the cedar tree in question was not a healthy tree. It did have some green vegetation on the very top and tips of some branches, but most of the branches were dead and covered with a black fungus material. The tree was not healthy. About a month before I cut the tree down, winds came up and broke off part of the top of the tree, knocking down several large limbs, narrowly missing my roof. This freaked my wife out (she suffers from a chronic illness and is on oxygen 24 hours a day), and we both agreed that the old cedar tree had to go.

We purchased our home in 2001, and the trees on our property were so thick you could hardly walk between them. Many of the trees were unhealthy, so I asked a U.S. Forest Service agent to come out to the house and give me some tree-management advice. He told me the best thing I could do for the trees was to thin them out. He said that cutting down older trees allowed the roots of the younger trees to spread out and stay healthier. He also said that trees located next to structures were often robbed of needed nutrients and water. Every tree that I have cut down has been for the purpose of **IMPROVING** the health of the trees on my property, or as in the case of the cedar tree in question, making my home safe from fire, as required by Cal Fire and the Allstate Insurance Co.

When I was told by Ms. Lippert in her letter that I "caused monetary damage" by cutting down my tree, my first reaction was to question exactly where the "monetary damage" occurred. And when I was told by you that the monetary damage was $12,400., my first thought was that maybe the tree landed on someone's vehicle. I still don't have a clue how I could cause that much damage by cutting down a sick, half-dead tree on my property. I'm sure you will enlighten me.

In my career as a firefighter (Ventura County Fire Captain, retired), I devoted my life to the protection of lives and property. Never in my wildest dreams would I think that I would be sued for trying to do the same for my home and my family. A Cal Fire Inspector told me to thin out the trees around my house, and I did what I was told – and I apologize for not advising AWAC of my intentions. If I had asked AWAC

for permission, and they said "No", I would have cut down the tree anyway.

What is apparent to me is that AWAC and Cal Fire need to better coordinate their efforts. I pay taxes to Cal Fire annually, and they have the responsibility for managing our forest. I do not contribute to the AWAC organization, and I question their authority to manage any part of my property. My feeling is that if you have a problem with my compliance with Cal Fire, your fight should be with Cal Fire – not with me.

I have tried my best to explain my reasons for cutting down the cedar tree in my front yard. I did not cut the tree down with the intent to damage our beautiful forest. I cut the tree down to protect my home and my family. I apologize for any damage that I may have caused by my actions, but the deed is done. I have many young cedar trees sprouting in my yard that I will graciously donate to AWAC if that will resolve the "damage" issue. If my explanation unsatisfactorily addresses your concerns, I suppose we'll have to go to court and let a judge decide who's right.

Respectfully,

George D. Hatt

George D. Hatt

THE LAW OFFICES OF JOHN G. WÜRM

JOHN G. WÜRM
Attorney At Law

December 2, 2013

George Hatt
P.O. Box 3551
Blue Jay, CA 92317

Re: 145 Birchwood Lane, Lake Arrowhead, California, Lot 9, Tract 7891

Dear Mr. Hatt:

Thank you for your letter dated November 22, 2013. I reviewed the letter and the enclosures. It appears to me that the decision of Allstate not to renew your policy was not related to the tree which you acknowledge you cut down. I am aware that Allstate has non-renewed other policies in the mountain areas. The reason for the non-renewal appears to be general concerns of the area for wildfire and other conditions. The letter from Allstate references they had requested a letter from the local fire department, which was not enclosed.

I also reviewed the e-mail and other material from Cal-Fire. The material from Cal-Fire only requires that trees be trimmed at least 10' from the chimney. Had you checked with AWAC, you would have been notified that AWAC does not require more trimming than is required by Cal-Fire. Specifically, AWAC allows trimming for fire safety reasons.

Your letter indicates, had you asked AWAC for permission to cut the tree down and permission been denied, that you would have cut the tree down anyway, and that your desire is to go to Court and have the case settled by a judge. Based upon your letter, it appears that it will be necessary for AWAC to file a lawsuit in order to provide the legal remedies allowed by the *Declaration of Restrictions* for Tract 7891. I will inform my client of those circumstances. If you wish to make any further comments or bring any other additional information to my attention, please don't hesitate to contact me.

Very truly yours,

LAW OFFICES OF JOHN G. WÜRM

John G. Würm

JGW:nkm
cc: AWAC

Telephone: 909.337.2557
Fax: 909.336.3697
27321 North Bay Road
Post Office Box 1875
Lake Arrowhead, CA 92352
Email: jwurm@linkline.com

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

DEPARTMENT S37 — HONORABLE DAVID COHN, JUDGE

ARROWHEAD WOODS ARCHITECTURAL COMMITTEE, Plaintiff, -vs- GEORGE D. HATT; DONNA R. HATT, Defendants.	Case No. CIVDS1400240

REPORTER'S PARTIAL TRANSCRIPT OF TRIAL PROCEEDINGS

FINDINGS BY THE COURT

MONDAY, AUGUST 31, 2015

APPEARANCES:

FOR THE PLAINTIFF: BY: JOHN G. WURM
Attorney at Law

FOR THE DEFENDANT: BY: TIMOTHY W. BROWN
Attorney at Law

REPORTED BY: REGINA B. VEGA
Official Reporter
C.S.R. No. 12612

SAN BERNARDINO, CALIFORNIA; MONDAY, AUGUST 31, 2015

AFTERNOON SESSION

DEPARTMENT NO. S37 HON. DAVID COHN, JUDGE

APPEARANCES:

(JOHN WURM, Attorney at Law,
representing the Plaintiff;
TIMOTHY BROWN, Attorney at Law,
representing the Defendant.)
(Regina B. Vega, Official Reporter,
C.S.R. No. 12612.)

(Proceedings were held but not transcribed herein for purposes of this partial transcript.)

THE COURT: All right. Thank you both.

All right. First of all, I want to thank both of you, Mr. Wurm and Mr. Brown, for your excellent presentations of this case, and in particular your arguments about the validity of the CC&Rs. Very interesting. I also appreciate the professionalism that both of you have shown in stipulating to the admission of exhibits and making sure that this case is decided on its merits and not, you know, whether something comes into evidence or not because the proper foundation was laid. So I appreciate your professionalism.

The property owned by Mr. and Mrs. Hatt is subject to the CC&Rs, the conditions, covenants, and restrictions. These

are not proxies. These were ballots. It was the clear intent of the parties to do it this way; that this is how the election would occur. And I think the necessary connections has been shown by the plaintiffs whereby the Arrowhead Woods Architectural Committee is the proper successor-in-interest to enforce these CC&Rs.

The family trust transfers don't count. Across the board, the law recognizes that a transfer from an individual to a family trust, where that individual is the trustee and the beneficiary, it's something that's done for estate planning purposes, it's not a transfer in the same sense as the sale of property is, notwithstanding the Black's Law definitions.

The IRS recognizes it that way. California law recognizes it that way. When property is transferred into a family trust people continue to pay their mortgages, and they're just not considered for these purposes.

So I think that the architectural woods -- I'm sorry, the Arrowhead Woods Architectural Committee clearly exists and has the authority to enforce the CC&Rs. The CC&Rs were properly renewed.

Now, there's been some testimony about whether Mr. Hatt knew about this. And he denies this. And it's really irrelevant, because he is charged with constructive knowledge of what the CC&Rs provide as a recorded instrument. Similarly, if he willfully ignored the CC&Rs just because he thought, darn it, this is my property and I'll do with it as I want and

don't need to consult anybody, that's irrelevant as well. The CC&Rs require that permission be obtained from the architectural committee before trimming or removing trees.

Mr. Hatt said on the stand and he said in his letter that he was ordered to remove the tree by CAL FIRE. That's patently incorrect. Now, perhaps Mr. Hatt remembers it that way. Mr. Barley didn't recall the conversation that he had with Mr. Hatt. And I think it's completely credible that they were looking at this tree that had some dead branches, and Mr. Barley may have said something like, "You know, that tree ought to go, it's within 100 feet of the property," and over the years in Mr. Hatt's mind that amounts to an order to remove the tree.

But I had some problems with Mr. Hatt's testimony on that. At one point during his testimony he said -- and I just marked this in my notes. Let me find it -- I can't find it right now so I'll summarize. He said CAL FIRE tells me to do something, I do it. I do it immediately.

Well, he didn't do it immediately. Three years elapsed. The problem with the insurance company was two years earlier. So I don't find it credible that Mr. Hatt thought that CAL FIRE had ordered him to remove the tree. But even if he did, it's irrelevant. Even if CAL FIRE ordered him to remove the tree -- and Mr. Barley was very clear on that, that CAL FIRE doesn't do that -- still, Mr. Hatt would be required to obtain the permission of the architectural committee. Now,

if the architectural committee refused under an order from CAL FIRE, I think Mr. Hatt and CAL FIRE would have a remedy against Arrowhead Woods Architectural Committee. But that's not the issue. Mr. Hatt was still required to obtain permission.

This letter that Mr. Hatt wrote, I don't know what to say about it. I find it very disturbing, the vitriol of that letter. I'm a little suspicious of letters whenever I read them and they contain these capitalized words as though the author is shouting at the people. I find the repeated references to the architectural committee as being Nazis deeply offensive. It belittles what occurred in Germany between 1933 and 1945. Somebody can object to what the architectural committee is doing and the choices that they make, but that doesn't make them Nazis.

Again, that's all irrelevant. The fact is that Mr. Hatt was required to obtain permission to remove the tree and did not.

So what are AWAC's damages? Well, there certainly is the $50 permit fee. There isn't any showing that AWAC would not have granted the removal of this tree. CAL FIRE says and they didn't say that -- Mr. Barley didn't remember having this specific discussion with Mr. Hatt, but he says, "This is what I always tell people," and it's in his e-mail, "if the tree is within a hundred feet of the house, it ought to come out so you can have defensible space." I think under those circumstances

Arrowhead Woods should have and probably would have granted the permit.

Also, although there isn't evidence that this tree was dead -- I've seen the photograph of the tree, half of it looks dead. It's not like it's that attractive. There are clearly some problems with that tree.

So there isn't any showing that the architectural committee would not have granted approval. But even so, assuming that it would not have, what are the damages? Mr. Ottoson's valuation method would make a lot of sense if Mr. Hatt were the plaintiff and he was suing a neighbor who had wrongfully come onto his property and cut down his tree. It's his tree. Mr. Hatt owned that tree. The architectural committee doesn't own that tree. The architectural committee merely has the authority to enforce the CC&Rs. They don't own the tree. So the architectural committee is not entitled to the measure of damages that Mr. Ottoson used. There's nothing wrong with his valuation method. It seemed like a respectable method. It's just for the wrong plaintiff.

The damage to the architectural committee -- and really there isn't any damage to the architectural committee. The architectural committee is enforcing the CC&Rs on behalf of the entire community, the 7- to 10,000 homeowners who live in that area. There was some testimony by the real estate agent that one of the appealing things about homes in the Arrowhead Woods neighborhood is that the forest is relatively more lush.

than the forest is in other parts of the mountains, particularly in Big Bear.

I'll note, although this is not in evidence, that's actually a controversial statement. Professionals in forestry management will tell you exactly otherwise, that one of the reasons we have these God awful problems with devastating fires and bark beetle infestation is because of the overforestation, and the forest would actually be much healthier if it were considerably thinner.

I see some forestry people in the back of the courtroom who are nodding their head at that.

My point about that, though, is that none of that is in evidence. The evidence before me is that Arrowhead Woods is more lush and therefore more attractive because there are more trees and it's, I guess, greener and lusher. That's the only evidence before me. So I'll take that as a given, even though I recognize there's some controversy about that.

How do you measure that? There are probably hundreds of thousands of trees in this area, and Mr. Hatt wrongfully took out one. Has he altered the character of the neighborhood because of the removal of that one tree? There wasn't a single witness who came in -- somebody who lived near Mr. Hatt and said, "He's really created some visual blight here by getting rid of one of these trees." It's one tree among tens or hundreds of thousands.

It certainly, operating on the lush-forest-is-better

theory, has some incremental damage to the forest as a whole, but I don't know how to evaluate it and there isn't any evidence. So the only damages that the plaintiff has shown in this case are $50.

So I am going to rule in favor of the plaintiff. I'm going to award damages of $50, and we'll schedule an order to show cause for submission of a proposed judgment.

Mr. Wurm, as representing the prevailing party, I'll ask you -- oh, let me back up. Injunctive relief. The plaintiff also asked for injunctive relief. I've read Exhibit No. 48, and there's a lot of talk about Nazis, but isn't any talk about him cutting down more trees. Mr. Hatt did say, interestingly, in his testimony this isn't the only tree he's cut down. He's cut down trees in the past. Am I to assume he's going to cut down trees in the future? I don't know when he cut down those trees and nobody bothered to ask that question. If he were on a tree-cutting campaign I would say that, yes, there's a reasonable basis to conclude that he's going to cut down trees in the future.

I can't do that. The Court doesn't issue injunctive relief just on the off chance that somebody may violate the law, may do something in violation of the CC&Rs. There isn't any showing that Mr. Hatt intends to cut down trees in the future. I would caution you however, Mr. Hatt, if you intend to do so, you should certainly bring it up to the architectural committee, which has authority over these things.

So I'm denying injunctive relief. I'm awarding $50 in damages. Mr. Wurm, if you would prepare the proposed judgment. Get Mr. Brown to approve it as to form, and if not content, and submit to the Court. We'll set an OSC here shortly.

Mr. Brown, you wanted to say something?

MR. BROWN: I have one question. Are you going to -- there's a prevailing party's attorney fees clause in the declaration. Are you going to order Mr. Hatt to pay Plaintiff's attorney fees?

THE COURT: I'll have to see a motion and then an opposition, and I'll consider it at that time. It's not before me right now.

MR. WURM: Is the Court's judgment that Plaintiff is the prevailing party?

THE COURT: Plaintiff is the prevailing party, $50. You have the positive judgment here.

I guess there's an argument, since I'm denying injunctive relief, that you're not the prevailing party. So I'll tell you what, I won't make that ruling and I'll consider that on any subsequent motions. And I'll decide at that time what the gravamen of this action was, whether it was for monetary damages or whether it was for injunctive relief. So I'm not going to make a determination at this time that Plaintiff is the prevailing party. But Plaintiff is entitled to, so prepare a judgment.

We'll schedule an order to show cause why the case should not be dismissed for failure to submit the proposed judgment. That's just the way we do things. If the judgment is signed before that date, the OSC simply comes off calendar. It's just the way I maintain some control of the case.

If I set it 30 days out, Mr. Wurm, Mr. Brown, will that be enough time for you?

MR. BROWN: Certainly for me.

THE COURT: Mr. Wurm?

MR. WURM: I would think so, your Honor.

THE COURT: All right. That date will be October 1, at 8:30. And if there are subsequent proceedings with respect to costs, that OSC will simply become irrelevant.

All right. Thank you both.

MR. WURM: Thank you, your Honor.

THE COURT: Have a good day, everyone.

UNIDENTIFIED SPEAKER: Thank you, your Honor.

THE COURT: Will counsel stipulate that we can return the exhibits, particularly the tree trunk?

MR. BROWN: No, we'll let you keep it.

THE COURT: There's not really room in our evidence locker for the -- what is it? -- 31-inch.

MR. HATT: I can pick it up right now.

THE COURT: If Mr. Wurm agrees.

MR. WURM: The tree trunk can be returned. You know, pending consultation with my clients regarding further

proceedings perhaps the Court should retain that.

THE COURT: Okay. We'll keep the exhibits for now with the exception of the tree trunk. Mr. Hatt, if you would take that with you, but do not dispose of it.

MR. HATT: I won't.

THE COURT: Thank you.

MR. WURM: I will --

THE JUDICIAL ASSISTANT: There are branches.

THE COURT: Oh, there are branches? Those were never introduced into evidence.

MR. BROWN: They were discussed.

THE COURT: So they're in evidence as well. Can we agree that the branches are part of the same exhibit?

MR. BROWN: Well, they actually do have different exhibit numbers.

THE COURT: Different exhibit numbers, okay.

MR. BROWN: I think it's like 7, 8, and 9.

THE COURT: All right. Mr. Wurm, it's agreeable with you if Mr. Hatt retains possession of the branches?

MR. WURM: Yes. And I'll go ahead and retrieve the witness book.

THE COURT: Okay. Thank you.

(The foregoing proceedings were concluded for the day.)

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN BERNARDINO

DEPARTMENT S37 — HONORABLE DAVID COHN, JUDGE

ARROWHEAD WOODS ARCHITECTURAL COMMITTEE,

Plaintiff,

-vs-

GEORGE D. HATT; DONNA R. HATT,

Defendants.

Case No. CIVDS1400240

STATE OF CALIFORNIA)
) ss.
COUNTY OF SAN BERNARDINO)

I, Regina Vega, Official Reporter of the Superior Court of the State of California, for the County of San Bernardino, do hereby certify under penalty of perjury that the foregoing pages, 1 through 10, comprise a full, true, and correct transcript of the proceedings held in the above-entitled matter on Monday, August 31, 2015.

Dated this 19th day of September, 2015.

Official Reporter
CSR No. 12612

PROOF OF SERVICE

I am employed in the County of San Bernardino, State of California. I am over the age of 18 and not a party to the within action. My business address is Post Office Box 1875, Lake Arrowhead, California, 92352.

On October 6, 2015, I caused to be served the document(s) described as **DECLARATION OF JOHN G. WURM IN SUPPORT OF MOTION FOR ATTORNEY'S FEES** on the interested party(ies) in this action by placing a true copy thereof enclosed in a sealed envelope and addressed as follows:

Timothy W. Brown
Bullard, Brown & Beal, LLP
3890 11th St. Suite 111
Riverside, CA 92501

[ ] **BY FACSIMILE:** I transmitted by facsimile machine, to the fax number indicated below, a true and correct copy of the document described above to counsel indicated below. The foregoing document was transmitted by facsimile transmission and the transmission was reported as completed and without error.

[X] **BY U.S. MAIL:** I caused such envelope(s) to be deposited in the mail at Lake Arrowhead, California, with the postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party(ies) served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

[ ] **BY PERSONAL SERVICE**: I caused a true copy of said document(s) to be hand-delivered to the addressee(s) via a person who is not a party to this action or a California registered process server. If required, said registered process server's original proof of personal service will be filed with the court immediately upon its receipt.

[ ] **BY ELECTRONIC TRANSMISSION**: Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed.

[X] **STATE:** I declare under penalty of perjury that the foregoing is true and correct and this document was executed on October 6, 2015, at Lake Arrowhead, California.

[ ] **FEDERAL:** I declare that I am employed in the office of a member of the bar of the Court at whose direction the service was made.

Suzanne DeSalle