

1 **Marquis Aurbach Coffing**
Brian R. Hardy, Esq.
2 Nevada Bar No. 10068
10001 Park Run Drive
3 Las Vegas, Nevada 89145
Telephone: (702) 382-0711
4 Facsimile: (702) 382-5816
bhardy@maclaw.com
5 Attorneys for Defendants

6 **DISTRICT COURT**

7 **HUMBOLDT COUNTY, NEVADA**

8 CLARK COUNTY REPUBLICAN CENTRAL
COMMITTEE, a Nevada non-profit
9 organization,

Case No.: CV0022834
Dept. No.: 2

10 Plaintiff,

11 vs.

MOTION FOR ATTORNEY'S FEES AND COSTS

12 NEVADA REPUBLICAN CENTRAL
COMMITTEE; DOES I-X; and ROE BUSINESS
ENTITIES I-X, inclusive,

13 Defendants.

14
15 Nevada Republican Central Committee aka the Nevada Republican Party (“NVGOP” or
16 “Defendant”) by and through its attorney of record, the law firm of Marquis Aurbach Coffing,
17 hereby submits this Motion for Attorney’s Fees and Costs. This motion is made based upon the
18 following Memorandum of Points and Authorities, the declarations of Brian R. Hardy, Esq., filed
19 herewith, the Verified Memorandum of Costs on file herein, the pleadings and papers on file
20 herein, and any oral argument by counsel permitted at the hearing on this matter.

21 **MEMORANDUM OF POINTS AND AUTHORITIES**

22 **I. INTRODUCTION**

23 This Court recently entered judgment in favor of the Defendant. Defendant then filed its
24 Verified Memorandum of Costs and Disbursements.

25 In the instant motion, Defendant urges this Court to award the attorneys’ fees and costs
26 necessarily incurred in the defense of this case. Because Plaintiff initiated litigation to pursue a
27 groundless claim devoid of any foundation in statute or law, Defendant petitions this Court for an
28 order Plaintiff to pay all of its reasonable attorneys’ fees, including an estimated \$1,500.00 in

1 attorney's fees for the preparation of this instant motion – a total of \$5,550 – pursuant to NRS
2 18.010(2)(b). Additionally, as the prevailing party in this matter, Defendant should be awarded a
3 minimum of \$334.26 for the litigation costs necessarily and actually incurred in the successful
4 and timely defense of this case.

5 II. STATEMENT OF FACTS & PROCEDURAL HISTORY

6 Plaintiff, non-profit corporation Clark County Republican Central Committee (the
7 “Rogue Corp.”),¹ wrongfully sought relief from this Court in an effort to prevent the duly elected
8 leadership of the Clark County Republican Central Committee (the “CCRCC”) from assuming
9 their elected positions and to block the NVGOP membership from considering and voting to
10 make changes relative its membership. This entire matter was brought by what can only be
11 described as a rogue entity parading around as political organization whose leadership has no
12 idea what the CCRCC actually is or how it operates. Notably, this Rogue Entity actually brought
13 this action in the name of a non-profit corporation formed (without notice or the approval of the
14 CCRCC membership) in August 2020 and it attached the actual Bylaws of the real CCRCC

15 ¹ The individuals purportedly running and filing this action on behalf of the Rogue Corp. brought this
16 action on behalf of the Clark County Republican Central Committee, *a nonprofit corporation*.
17 According to the Nevada Secretary of State this nonprofit corporation was formed on August 7, 2020.
18 Whereas the Clark County Republican Central Committee (the “CCRCC”) is actually a creature of statute
19 created under NRS 293. Notably, NRS 293.033 defines “Central committee” as “the county or the state
20 authority of a major political party.” In this case the major political party is the Republican Party which
21 was qualified under NRS 293.728. Such is readily acknowledged by the filing made with the Nevada
22 Secretary of State on its Committee Registration Form wherein the CCRCC clearly checks the box
23 acknowledging it is a “Committee Sponsored by a Political Party”. And, as a committee of a major
24 political party (not a rogue nonprofit organization formed without notice to or the approval of the
25 membership of the CCRCC) all of its undertakings and issues are to be resolved through the party and
26 courts are not to intervene in this process. *See Republican Party of State of Conn. v. Tashjian*, 770 F.2d
27 265, 281 (2nd Cir. 1985) (“Tashjian II”); *aff’d* 479 U.S. 208, 107 S.Ct. 544 (1986) (affirming that a
28 political party has the right “to choose its own structure, select its own standard bearers, and formulate its
own platform – all free from the intrusion of state regulation.” “This *principle extends to party affairs in
general* and to primary elections in particular.” *Id.* (emphasis added). “[A] court may not
constitutionally substitute its own judgment for that of the party.” *Tashjian I*, 479 U.S. at 224. This
longstanding legal precedent is not lost on the individuals controlling the Rogue Corp. which only
recently (on May 26, 2021) had the same affirmed in Eight Judicial District Court Case No.: A-21-
834992-C styled as *Carreon et al v. Clark County Republican Central Committee*. *See* CCRCC’s
Opposition, attached hereto as As such, it is wholly unconscionable that this same group would then seek
(*ex parte*) for this Court to intervene and grant injunctive relief claiming a likelihood of success on the
merits when only months ago they affirmed to the district court in Clark County that “a private political
association has the discretion to select its members pursuant to the First Amendment freedom of
association clause.” *Id.* at 10:5-6.

1 which themselves assert they were originally adopted April 4, 1986 and were last amended
2 September 17, 2019 (prior to the Rogue Corp. ever even coming into existence). All the while
3 having a sitting senator affirming “under the penalty of perjury of the laws of the State of
4 Nevada” that the facts stated in the Verified Complaint were actually true and correct.

5 Plaintiff undertook the extraordinary step of pursuing judicial action to undo the
6 leadership election, filing a complaint and requesting an ex parte temporary restraining order and
7 preliminary injunction on October 8, 2021. Such a decision callously disregarded the historical,
8 sacred boundaries between the judiciary and the political process. Indeed, Plaintiff asked this
9 Court to abrogate the Defendant’s right to determine its own internal procedures for electing its
10 political leadership, despite courts having long avoided meddling in such matters. Indeed,
11 freedom of political association is a constitutionally protected right enshrined in the First
12 Amendment of the U.S. and Nevada Constitutions.

13 Recognizing the extraordinary nature of Plaintiff’s request for judicial remedy, this Court
14 denied Plaintiff’s request for injunctive relief and the affirmatively dismissed its complaint with
15 prejudice, entering judgment for Defendant on October 14, 2021. A notice of entry for the
16 judgment was filed on November 3, 2021. As the prevailing party, Defendant then proceeded to
17 file its Verified Memorandum of Costs and Disbursements in the amount of \$334.26.

18 **III. LEGAL ARGUMENT**

19 District courts have broad discretion to award reasonable attorney’s fees, provided that
20 fees are authorized by law and the court considers all of the factors required under the Supreme
21 Court of Nevada’s precedents. *See, e.g., Shuette v. Beazer Homes Holdings Corp.*, 121 Nev. 837,
22 864-65, 124 P.3d 530, 548-49 (2005). Although costs are presumptively available to prevailing
23 parties under NRS 18.020, the reasonableness of costs in a given case is similarly a matter
24 entrusted to courts’ discretion. *See, e.g., Cadle Co v. Woods & Erickson, LLP*, 131 Nev. Adv.
25 Op. 15, 345 P.3d 1049, 1054 (2015).

26 In this case, the Court should order Plaintiff to pay Defendant’s attorney’s fees because:
27 (A) NRS 18.010(2)(b) encourages a district court to award attorney’s fees to a prevailing party
28

1 who defeats groundless, frivolous claims and (B) the *Brunzell* factors confirm that Defendant’s
2 requested attorney’s fees are reasonable.

3 **A. THE NVGOP IS ENTITLED TO AN AWARD OF FEES AND COSTS**

4 NRS 18.010(2)(b) *encourages* a district court to award attorneys’ fees to a prevailing
5 party “when the court finds that the claim ... of the opposing party was brought or maintained
6 without reasonable ground or to harass the prevailing party.” Under Nevada law, a claim is
7 without reasonable ground if the allegations in the complaint are not supported by any credible
8 evidence. *Bobby Berosini, Ltd. v. People for the Ethical Treatment of Animals*, 114 Nev. 1348,
9 1354, 971 P.2d 383, 387 (1998); *Bergmann v. Boyce*, 109 Nev. 670, 856 P.2d 560 (1993).

10 In this case, Plaintiff’s claims were determined not only to lacking with respect to any
11 credible evidence but wholly lacking failing as a matter of law. Indeed, in its October 14, 2021
12 entry of judgment, this Court dismissed Plaintiff’s complaint *with prejudice*, noting that it lacked
13 jurisdiction to hear the claims. This Court noted the “well-settled policy” of judicial non-
14 interference in the internal affairs of political parties as the reasoning for its lack of jurisdiction
15 (citing *O’Brien v. Brown*, 409 U.S. 1, 92 S. Ct. 2718 (1972)). Even if Plaintiff managed to
16 overcome the threshold issue of jurisdiction, its claims lacked credible evidence. As noted in
17 opposition to Plaintiff’s baseless Ex Parte Application, both an independent special committee
18 and an expert parliamentarian confirmed that Defendant’s undertakings were valid and
19 reasonable. Moreover, the body of the NVGOP ultimately affirmed the decision of the special
20 committee at the meeting which was allowed to continue despite Plaintiff’s baseless lawsuit.

21 Proceeding to litigate a baseless claim, especially one that attacks the very foundation of
22 the freedom of political association, is precisely the type of waste that NRS 18.010(2)(b) seeks to
23 deter. To this end, the Court should award Defendant \$5,550 for the attorneys’ fees incurred
24 since the beginning of this case and for the preparation of this instant motion.

25 **B. THE NGVOP’S ATTORNEY’S FEES ARE REASONABLE**

26 Nevada courts may employ various approaches in determining the reasonableness of
27 attorney’s fees, so long as the requested amount of attorney’s fees is assessed in context of the
28 *Brunzell* factors. *Halley vs. Eighth Judicial Dist. Court*, 128 Nev. 171, 178, 273 P.3d 855, 860

1 (2012). In *Brunzell*, the Supreme Court of Nevada noted that the essential factors for assessing
2 the reasonableness of attorney’s fees include: (1) the advocate’s professional qualities; (2) the
3 nature of the litigation; (3) the work performed; and (4) the result. *See* 85 Nev. 345, 349, 455
4 P.2d 31, 33 (1969). These factors confirm the reasonableness of Defendants’ request for \$5,550
5 in attorney’s fees pursuant to NRS 18.010(2).

6 **1. The qualities of the advocates.**

7 The first *Brunzell* factor requires this Court to consider the “training, education,
8 experience, professional standing, and skill” of the attorneys involved. *See* 85 Nev. at 349, 455
9 P.2d at 33.

10 The quality of Marquis Aurbach Coffing Attorneys (“MAC”) lawyers as advocates is
11 well known in this community. The firm is AV rated by Martindale-Hubbell, the highest rating a
12 law firm can receive. Additionally, Marquis Aurbach Coffing is listed in the Martindale-Hubbell
13 registry of preeminent lawyers.

14 Brian R. Hardy, Eq. is and AV Rated attorney and served as lead counsel for Defendant
15 in this case. Mr. Hardy has been a Nevada-licensed attorney since 2006 and he is a Director at
16 Marquis Aurbach Coffing. Mr. Hardy specializes in governance, election law, and administrative
17 law. Consistent with these specialties, Mr. Hardy has provided Defendant’s excellent
18 representation.

19 **2. The character and breadth of the work.**

20 The second *Brunzell* factor centers of the difficulty, intricacy, and importance of the work
21 done, as well as the time and skill required. *Id.* at 349, 455 P.2d at 33.

22 Candidly, this case was not particularly difficult insofar as Plaintiff attempted to
23 impermissibly litigate the internal affairs of a political party. This attempt amounted to a cut-and-
24 dry case of a political question that could not, under any circumstances, vest this Court with
25 proper jurisdiction. Nevertheless, this case was rather intricate given the detailed knowledge
26 required of parliamentary procedure, a notoriously complex subject. Moreover, for the reasons
27 stated above, namely the threat posed to the freedom of association, Plaintiff’s claims were a
28 serious concern for Defendant and society at large. For this reason, it was necessary for

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Defendant's to fully research the facts and relevant law, as well as zealously and timely contest Plaintiff's complaint and request for injunctive relief.

3. The work actually performed.

The third *Brunzell* factor asks this court to look to the work actually done, including "the skill, time and attention given to the work." 85 Nev. at 349, 455 P.2d at 33. Since the filing of Plaintiff's complaint; counsel and supervised support staff dedicated 9 billable hours to representing the Defendants, not including the time required for preparing the instant motion. The pleadings in this case and declaration of counsel confirm that the work was actually done. The fee invoice attached to the instant motion also demonstrate that counsel was cautious and efficient in their billing practices. Thus, the work actually performed strongly supports Defendants' request attorney's fees.

4. The result.

The final *Brunzell* factor is "whether the attorney was successful and what benefits were derived." 85 Nev. at 349, 455 P.2d at 33. Prevailing at trial is the definition of success. By securing a dismissal of the Plaintiff's complaint *with prejudice*, as well as a denial of Plaintiff's request for injunctive relief, the legal services provided a significant benefit to Defendant. Indeed, \$5,550 total for attorney's fees is a markedly better result than Plaintiff's desired result of stopping a state party meeting, party election and impinging upon the freedoms of party members to cast their vote for the new party leadership.

Therefore, after applying the *Brunzell* factors to the facts of this case, this Court should conclude that the fees Defendant incurred in this matter were reasonable and justified. Thus, the Court should award Defendant \$5,550 for its attorney's fees.

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

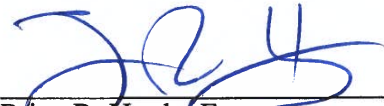
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IV. CONCLUSION

Based on the foregoing, Defendant NVGOP respectfully requests the Court grants its Motion for Attorney's Fees and Costs and award it \$5,884.26 in total attorney's fees and costs.

Dated this 17th day of November, 2021.

MARQUIS AURBACH COFFING

By 
Brian R. Hardy, Esq.
Nevada Bar No. 10068
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney(s) for Defendant

1 **DECLARATION OF BRIAN R. HARDY, ESQ. IN SUPPORT OF MOTION FOR**
2 **ATTORNEY'S FEES AND COSTS**

3 BRIAN R. HARDY, ESQ., declares as follows:

4 1. I am over the age of 18 years and have personal knowledge of the facts stated
5 herein, except for those stated upon information and belief, and as to those, I believe them to be
6 true. I am competent to testify as to the facts stated herein in a court of law and will so testify if
7 called upon.

8 2. I am counsel for NRCC, the defendant in this matter.

9 3. I have personal knowledge of the facts stated herein, except for those stated upon
10 information and belief, and as to those, I believe them to be true. I am competent to testify as to
11 the facts stated herein in a court of law and will so testify if called upon.

12 4. NRCC is requesting \$5,550 in total attorneys' fees and \$334.26 in costs, for a
13 total amount of \$5,884.26 in fees and costs. The requested attorneys' fees were actually incurred
14 in this matter. A true and correct copy of the billing details through October 31st, with
15 appropriate redactions to avoid disclosure of attorney/client privileged material and other
16 protected information is attached hereto as **Exhibit A**. Please note that Exhibit A does not reflect
17 the estimated \$1,500 in attorney's fees incurred in the preparation of this instant motion.
18 Defendants' Verified Memorandum of Costs and Disbursements is attached hereto as **Exhibit B**.

19 5. Based upon the factors listed in *Brunzell v. Golden Gate Nat'l Bank*, 85 Nev. 345,
20 349, 455 P.2d 31 (1960), the above attorney fees are reasonable, and should be awarded to the
21 NRCC. The factors enumerated in *Brunzell* are as follows:

22 a. *Qualities of the Advocate*: Marquis Aurbach Coffing, is a Martindale-Hubbell AV
23 rated firm. I have practiced law in this community since 2006 and have a reputation for
24 competency in commercial litigation matters. In this case, the NRCC was billed for legal
25 services at the rates agreed upon with this firm. This sum is reasonable in light of the
26 firm's reputation, my legal experience and the fees generally charged in this community.

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b. *Character of Work:* On information and belief, the Court is aware of my work product and that of my firm, Marquis Aurbach Coffing. The work also resulted in a judgment in favor of NRCC.

c. *The Work Actually Performed:* The opposition to Clark County Republican Central Committee's Ex Parte/Emergency Application for Temporary Restraining Order and Motion for Preliminary Injunction on an Order Shortening Time was necessary in order to prevent Plaintiffs from ousting Defendants as the rightful leaders of the NVGOP.

d. *The Result:* Counsel secured a dismissal of the Plaintiffs' complaint with prejudice, as well as a denial of Plaintiffs' request for injunctive relief.

6. In addition to attorneys' fees, Defendant requests \$334.26 for their costs, which are supported by the Verified Memorandum of Costs and Disbursements on file herein (as referenced in Exhibit B mentioned above).

7. In sum, based upon community standards and the work involved in prosecuting this lawsuit, the total attorney's fees and costs incurred by Defendant in the amount of \$5,884.26 were both reasonable and necessary.

8. If the Court requires any additional information or documentation, Defendant and/or my office will gladly submit a supplemental memorandum.

Pursuant to NRS § 53.045, I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

Dated this 22 day of November, 2021.


BRIAN R. HARDY, ESQ.

MARQUIS AURBACH COFFING

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **MOTION FOR ATTORNEY'S FEES AND COSTS** was submitted for filing and/or service with the Sixth Judicial District Court on the 23rd day of November, 2021. The foregoing document was served via email and U.S. mail to the following counsel of record:

Mitchell S. Bisson, Esq.
LAW OFFICES OF MITCHELL S. BISSON, ESQ.
911 N. Buffalo Dr. Ste 201
Las Vegas, NV 89128
mbisson@bissonlegal.com


an employee of Marquis Aurbach Coffing

Exhibit A

**MARQUIS AURBACH
COFFING**
ATTORNEYS AT LAW

10001 PARK RUN DRIVE
LAS VEGAS, NEVADA 89145
Telephone 702-382-0711
Fax 702-382-5816

Nevada State Republican Party
Attn: Michael McDonald - Chairman
2810 W. Charleston Blvd., Ste. 69
Las Vegas, NV 89102

Invoice 384139
November 19, 2021

ID: 14221-006 - BRH

RE: Carreon v. NV Republican Central Committee et al.

For Services Rendered Through October 31, 2021

Current Fees	4,050.00	
Total Current Due		4,050.00

Payment is due upon receipt of invoice. Invoices not paid within 30 days are considered delinquent. Interest will accrue on invoices not paid within 30 days and we may discontinue representation at such time. For your convenience, we accept Visa, MasterCard and American Express. Please call 702-942-2159 if you would like to pay by credit card.

MARQUIS AURBACH COFFING P.C.

Nevada State Republican Party
RE: Carreon v. NV Republican Central Committ
ID: 14221-006 - BRH

November 19, 2021
Invoice 384139
Page 2

Fees				
Date	Atty	Description	Hours	Amount
10/13/21	BRH	Correspond with clients regarding [REDACTED]. Place phone call to opposing counsel and draft correspondence to opposing counsel regarding filing of the same.	0.60	270.00
10/13/21	BRH	Correspond with opposing counsel regarding authorization to accept service and to receive copies of all documents regarding the same.	0.60	270.00
10/13/21	BRH	Assess, analyze and review complaint.	0.50	225.00
10/13/21	BRH	Assess, analyze and review motion for preliminary injunction.	0.70	315.00
10/13/21	BRH	Begin preliminary work on drafting memorandum in opposition to motion for preliminary injunction.	1.80	810.00
10/13/21	BRH	Prepare preliminary draft of notice of appearance and contact Humboldt court regarding appearance on behalf of the Nevada Republican Party and request for an order not to be done without counsel present.	0.50	225.00
10/14/21	BRH	Revise and finalize opposition to ex parte application for TRO. Remit preliminary draft to clients for review and discussion.	2.80	1,260.00
10/14/21	BRH	Review comments from clients regarding [REDACTED].	0.80	360.00
10/14/21	BRH	Coordinate with clerk regarding order dismissing complaint. Correspond with clients regarding [REDACTED].	0.70	315.00
Total Fees			9.00	4,050.00
Total Fees and Disbursements				4,050.00
Total Current Charges				4,050.00

Exhibit B

MARQUIS AURBACH COFFING

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1 **Marquis Aurbach Coffing**
2 Brian R. Hardy, Esq.
3 Nevada Bar No. 10068
4 10001 Park Run Drive
5 Las Vegas, Nevada 89145
6 Telephone: (702) 382-0711
7 Facsimile: (702) 382-5816
8 bhardy@maclaw.com
9 Attorneys for Defendants

FILED

2021 NOV 12 PM 2:09

TAMARA BENTON
DIST. COURT CLERK

6 **IN THE SIXTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA**
7 **IN AND FOR THE COUNTY OF HUMBOLDT**

8 CLARK COUNTY REPUBLICAN CENTRAL
9 COMMITTEE, a Nevada non-profit
10 organization,

11 Plaintiff,

12 vs.

13 NEVADA REPUBLICAN CENTRAL
14 COMMITTEE; DOES I-X; and ROE BUSINESS
15 ENTITIES I-X, inclusive,

16 Defendant.

Case No.: CV 0022834
Dept. No.: II

17 **VERIFIED MEMORANDUM OF COSTS AND DISBURSEMENTS**

18 Defendants Nevada Republican Central Committee ("Defendants") by and through their
19 attorneys of record, the law firm of Marquis Aurbach Coffing, hereby submit the following
20 Verified Memorandum of Costs and Disbursements pursuant to NRS 18.110:

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MARQUIS AURBACH COFFING

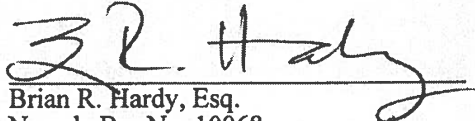
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DESCRIPTION	AMOUNT	AUTHORIZATION	SUPPORT
10/14/2021 copies	\$4.00	NRS 18.005(12)	Exhibit A
10/14/2021 filing fee	\$183.00	NRS 18.005(1)	Exhibit B
Copies	\$118.00	NRS 18.005(12)	Exhibit C
Postage	\$1.76	NRS 18.005(14)	Exhibit D
Scanning	\$27.50	NRS 18.005(11-12)	Exhibit E
TOTAL	\$334.26		

Dated this 9th day of November, 2021.

MARQUIS AURBACH COFFING

By 
Brian R. Hardy, Esq.
Nevada Bar No. 10068
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorney(s) for Defendants

MARQUIS AURBACH COFFING

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing **VERIFIED MEMORANDUM OF COSTS AND DISBURSEMENTS** was submitted for filing and/or service with the Sixth Judicial District Court on the 9th day of November, 2021. The foregoing document was served via email and U.S. mail to the following counsel of record:

Mitchell S. Bisson, Esq.
LAW OFFICES OF MITCHELL S. BISSON, ESQ.
911 N. Buffalo Dr. Ste 201
Las Vegas, NV 89128
mbisson@bissonlegal.com

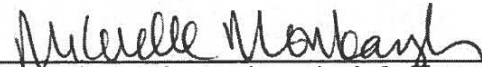

an employee of Marquis Aurbach Coffing

Exhibit A

HUMBOLDT COUNTY CLERK

50 W. 5th St. - Courthouse Winnemucca, NV 89445-3199
Telephone (775) 623-6343

89409

DATE 10/14/21

RECEIVED FROM Tosha Sheppard

THE SUM OF four dollars and 00/100 DOLLARS \$ 4.00

FOR Copies for CV0022834

AMOUNT OF ACCOUNT \$ 4

AMOUNT PAID.....\$ 4

BALANCE DUE.....\$ 0

Thank You!

CASH CHECK M.O. CREDIT CARD

BY mpinners

Exhibit B

HUMBOLDT COUNTY CLERK

50 W. 5th St. - Courthouse Winnemucca, NV 89445-3199
Telephone (775) 623-6343

89403

DATE 10/14/21

RECEIVED FROM Chaska Sheppard

THE SUM OF One hundred Eighty Three DOLLARS \$ 183⁰⁰

FOR CV0022834 Civil Answered for NV Republican Central
Committee

AMOUNT OF ACCOUNT \$ 183⁻

AMOUNT PAID.....\$ 183⁻

BALANCE DUE.....\$ -

CASH CHECK M.O. CREDIT CARD

Thank You!

1084

BY [Signature]

Exhibit C

Accounting Date	Cost Code	Units	Amount
10-12-2021	Copies	37	\$ 9.25
10-12-2021	Copies	1	\$ 0.25
10-12-2021	Copies	4	\$ 1.00
10-13-2021	Copies	2	\$ 0.50
10-13-2021	Copies	1	\$ 0.25
10-13-2021	Copies	12	\$ 3.00
10-13-2021	Copies	79	\$ 19.75
10-13-2021	Copies	2	\$ 0.50
10-13-2021	Copies	2	\$ 0.50
10-13-2021	Copies	2	\$ 0.50
10-13-2021	Copies	20	\$ 5.00
10-14-2021	Copies	4	\$ 1.00
10-14-2021	Copies	3	\$ 0.75
10-14-2021	Copies	15	\$ 3.75
10-14-2021	Copies	1	\$ 0.25
10-14-2021	Copies	39	\$ 9.75
10-14-2021	Copies	6	\$ 1.50
10-14-2021	Copies	12	\$ 3.00
10-14-2021	Copies	3	\$ 0.75
10-14-2021	Copies	3	\$ 0.75
10-14-2021	Copies	3	\$ 0.75
10-14-2021	Copies	2	\$ 0.50
10-14-2021	Copies	2	\$ 0.50
10-14-2021	Copies	12	\$ 3.00
10-14-2021	Copies	1	\$ 0.25
10-14-2021	Copies	1	\$ 0.25
10-14-2021	Copies	100	\$ 25.00
10-14-2021	Copies	5	\$ 1.25
10-19-2021	Copies	21	\$ 5.25
10-20-2021	Copies	56	\$ 14.00
10-25-2021	Copies	2	\$ 0.50
10-25-2021	Copies	4	\$ 1.00
10-25-2021	Copies	2	\$ 0.50
10-25-2021	Copies	5	\$ 1.25
10-25-2021	Copies	1	\$ 0.25
10-25-2021	Copies	1	\$ 0.25
10-25-2021	Copies	6	\$ 1.50
	Copies Total		\$ 118.00

Exhibit D

10-25-2021	Postage	0	\$	1.76
	Postage Total		\$	1.76

Exhibit E

10-13-2021	Scanning	2	\$	0.50
10-13-2021	Scanning	2	\$	0.50
10-14-2021	Scanning	100	\$	25.00
10-25-2021	Scanning	6	\$	1.50
	Scanning Total		\$	27.50