

SEVENTH JUDICIAL DISTRICT COURT
COUNTY OF CATRON
STATE OF NEW MEXICO

FILED
7th JUDICIAL DISTRICT COURT
Catron County
2/19/2026 1:52 PM
RACHEL GONZALES
CLERK OF THE COURT
/s/ Jerome Adam

JESSE CHILDERS,

Plaintiff,

v.

No. D-728-CV-2024-00026

WILD HORSE RANCH LANDOWNER'S ASSOCIATION,

Defendant.

ORDER ENTERING JUDGMENT ON ATTORNEY FEES

THIS MATTER having come before the Court for a hearing on August 12, 2025 and status conference hearing held on February 11, 2026, Defendant appearing through Counsel, Rosebrough, Fowles & Foutz, P.C., McKade R. Loe, and Plaintiff appearing Pro Se, and it appearing, upon the argument of Counsel, reviewing documentary evidence and being otherwise fully informed, hereby orders the following:

IT IS ORDERED, ADJUDGED AND DECREED that the Plaintiff is responsible for Defendant's attorney's fees in the total amount of \$39,993.82 (attorney's fees of \$36,862.40 costs of \$147.5, and taxes \$2,983.92). An outline of attorney fees is attached hereto as Exhibit "A."

SO ORDERED.



HON. Mercedes C. Murphy
District Court Judge

SUBMITTED BY:

/s/ McKade R. Loe
McKade R. Loe
Attorney for Defendant
Rosebrough, Fowles & Foutz, P.C.

(505) 722-9121.

EXHIBIT "A"

Rosebrough, Fowles & Foutz, P.C.

101 West Aztec Avenue, Suite

A

P.O. Box 1027

Gallup, NM 87305

Invoice submitted to:

ALLEN DUGAN

WILD HORSE RANCH

LANDOWNERS ASSOCIATION

11 LASSO LANE

PIE TOWN, NM 87827

August 20, 2025

Professional Services

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
<u>2024</u>				
7/18/2024 - ML	REVIEW BYLAWS AND COMMUNITY GOVERNING DOCUMENTS; TELEPHONE CONFERENCE WITH CLIENTS; PREPARED DEMAND LETTER, [REDACTED]	250.00/hr	*	375.00
7/19/2024 - ML	FINALIZE DEMAND LETTER TO BE SENT [REDACTED] REVIEW VOTING PROCESS TO INCLUDE IN LETTER; SENT TO CLIENT TO REVIEW; GAVE INSTRUCTIONS TO VALERIE TO SEND LETTER [REDACTED]	250.00/hr	*	187.50
7/20/2024 - ML	REVIEW GOVERNING DOCUMENTS IN PREPARATION FOR ANNUAL MEMBERS MEETING; ATTENDED ANNUAL MEMBERS MEETING VIA ZOOM; DISCUSS NEXT STEPS WITH BOARD FOLLOWING ANNUAL MEMBERS MEETING.	250.00/hr	*	355.00
7/22/2024 - ML	REVIEW CASE NO. D-728-CV-2024-00026; DISCUSSION WITH [REDACTED] ASSOCIATION;	250.00/hr	*	145.00
7/23/2024 - ML	RESEARCH NEW MEXICO CASE LAW AND STATUTES TO DETERMINE STRENGTH OF ARGUMENTS AND CLAIMS IN COMPLAINT FILED BY JESSE CHILDERS; TELEPHONE CALL WITH CATRON COUNTY CLERK TO DETERMINE WHO FILED THE CERTIFICATE OF ELECTION; RESEARCH NEW MEXICO CASE LAW AND STATUTES TO DETERMINE BEST CLAIMS AGAINST	250.00/hr	*	1,250.00

			<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
		JESSE CHILDERS INCLUDING AWARD OF PUNITIVE DAMAGES AND ATTORNEY FEES;			
7/24/2024	- ML	FINALIZING MOTION TO DISMISS AND COMPLAINT FOR DECLARATORY JUDGEMENT AND COMPLAINT FOR DEFAMATION;	250.00/hr	*	500.00
7/25/2024	- ML	FINAL REVIEW OF MOTION TO DISMISS AND COMPLAINT; GAVE TO JASMINE TO FORMAT AND SEND TO CLIENT; DISCUSSION WITH CLIENT TO ADD ADDITIONAL INFORMATION TO PREPARE FOR FILING; ORGANIZED AND ATTACHED EXHIBITS TO BE USED IN MOTION TO DISMISS AND COMPLAINT; GAVE TO JASMINE TO SEND FOR FINAL REVIEW.	250.00/hr	*	250.00
7/26/2024	- JL	FORMAT AND FINALIZE MOTION TO DISMISS, ET AL.; DRAFT ENTRY OF APPEARANCE AND E-FILE THE SAME PER ATTORNEY'S INSTRUCTIONS.	100.00/hr	*	50.00
7/29/2024	- ML	RECEIVED CORRESPONDENCE FROM CLIENT; FORWARDED TO WIL TO DETERMINE ANY UPDATES IN THE ONGOING LITIGATION AND REVIEW REGISTER OF ACTIONS; DISCUSSION WITH JASMINE REGARDING DEMAND LETTER THAT WAS SENT [REDACTED] VIA MAIL ONLY.	250.00/hr	*	62.50
8/1/2024	- ML	REVIEW FILE TO PREPARE FOR HEARING; ATTENDED HEARING; DISCUSSION WITH CLIENT FOLLOWING HEARING.	250.00/hr	*	312.50
8/7/2024	- ML	CORRESPONDENCE WITH CLIENT TO DISCUSS [REDACTED]	250.00/hr	*	62.50
8/19/2024	- ML	CORRESPONDENCE WITH CLIENT REGARDING [REDACTED] REVIEW MOTION FILED BY OPPOSING PARTY; REVIEW RULES OF CIVIL PROCEDURE IN REGARDS TO SERVICE OF PROCESS.	250.00/hr	*	105.00
8/26/2024	- ML	RECEIVED NOTIFICATION FROM CLIENTS THAT JESSE CHILDERS HAD OBTAINED COUNSEL; REACHED OUT TO OPPOSING COUNSEL TO DISCUSS MATTERS PERTAINING TO THE CASE AND USE OF ASSOCIATION'S FUNDS.	250.00/hr	*	62.50
9/4/2024	- ML	DISCUSSION [REDACTED] REGARDING UPCOMING HEARING AND ISSUES PERTAINING TO THE HEARING; PREPARED ARGUMENT OUTLINE IN PREPARATION FOR HEARING ON FRIDAY SEPTEMBER 6, 2024.	250.00/hr	*	355.00

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
9/7/2024	ML PREPARED FOR AND ATTENDED ZOOM MEETING WITH BOARD MEMBERS OF WILD HORSE RANCH LANDOWNERS ASSOCIATION.	250.00/hr	*	250.00
9/10/2024	ML CORRESPONDENCE WITH OPPOSING COUNSEL.	250.00/hr	*	42.50
9/12/2024	ML WORKED ON MOTION FOR TEMPORARY RESTRAINING ORDER AND DISCOVERY REQUESTS; SENT TO JASMINE TO SENT TO CLIENT FOR REVIEW AND APPROVAL.	250.00/hr	*	500.00
	- ML WORKED ON CASE THEORY [REDACTED] FINALIZED DISCOVERY REQUESTS.	250.00/hr	*	187.50
9/16/2024	ML REVIEWING MOTION FOR TEMPORARY RESTRAINING ORDER AND DISCOVERY REQUESTS; MAKING CHANGES PURSUANT TO REQUESTS FROM CLIENTS.	250.00/hr	*	145.00
9/19/2024	JL FORMAT AND FINALIZE MOTION FOR TEMPORARY RESTRAINING ORDER, ET AL. AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND INTERROGATORIES; DRAFT CERTIFICATE OF SERVICE; AND E-FILE MOTION AND COS PER ATTORNEY'S INSTRUCTION.	100.00/hr	*	100.00
9/23/2024	ML CORRESPONDENCE WITH CLIENT ON UPDATE WITH CASE AND NEXT STEPS FORWARD. [REDACTED] [REDACTED] CORRESPONDENCE WITH OPPOSING COUNSEL INFORMING THAT NEW WEBSITE IS BEING USED AND REQUESTING THAT DEFENDANTS IMMEDIATELY CEASE FROM USING THE SAME AND REPRESENTING THAT THE WEBSITE IS AN ASSOCIATION ASSET; REQUESTED UPDATE ON SETTLEMENT OFFER.	250.00/hr	*	167.50
10/2/2024	ML REVIEW RESPONSE TO MOTION TO DISMISS; RESEARCHING NEW MEXICO CASE LAW ON STRENGTHS OF ARGUMENTS; PREPARED REPLY IN SUPPORT OF MOTION TO DISMISS; SENT EMAIL TO OPPOSING COUNSEL REQUESTING UPDATE ON SETTLEMENT PROPOSAL.	250.00/hr	*	312.50
10/7/2024	ML DISCUSSION WITH JASMINE TO SEND DOCUMENTS TO CLIENT; REVIEW FILE TO DETERMINE DATE OF FILING MOTION FOR TEMPORARY RESTRAINING ORDER AND RULES TO DETERMINE DUE DATE FOR RESPONSE; EMAIL CORRESPONDENCE WITH CLIENTS GIVING UPDATE ON STATUS OF CASE;	250.00/hr	*	62.50

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
10/8/2024	ML RECEIVED RESPONSE TO MOTION FOR TEMPORARY RESTRAINING ORDER; REVIEWED RESPONSE; REVIEWED NEW MEXICO CASE LAW AND STATUTES TO DETERMINE STRENGTHS OF ARGUMENTS.	250.00/hr	*	250.00
10/11/2024	ML DISCUSSION WITH CLIENT [REDACTED]	250.00/hr	*	105.00
10/14/2024	ML REVIEW RESPONSE TO MOTION FOR TEMPORARY RESTRAINING ORDER; PREPARED REPLY IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER; REVIEW GOVERNING DOCUMENTS OF ASSOCIATION TO ENSURE THAT ALL RELEVANT DOCUMENTS ARE ATTACHED TO THE MOTION FOR TEMPORARY RESTRAINING ORDER; DISCUSSION [REDACTED] SENT TO CLIENT FOR REVIEW.	250.00/hr	*	937.50
10/18/2024	ML REVIEWED AFFIDAVIT [REDACTED] FINALIZED REPLY IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER; GAVE FILE TO JASMINE TO FILE.	250.00/hr	*	125.00
10/21/2024	ML ENSURED FILING OF REPLY IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER ND REQUEST FOR HEARING ON ALL MATTERS; GAVE TO JASMINE TO FILE.	250.00/hr	*	82.50
	JL FORMAT AND FINALIZE REPLY IN SUPPORT OF MOTION FOR TRO, NOTICE OF COMPLETION OF BRIEFING, AND REQUEST FOR HEARING AND E-FILE SAME. PROVIDE NOTICE TO PARTIES.	100.00/hr	*	50.00
10/22/2024	ML RECEIVED ANSWERS AND OBJECTIONS TO DISCOVERY REQUESTS; REVIEWED ANSWERS TO DETERMINE POTENTIAL ARGUMENTS FROM OPPOSING PARTY AND TO DETERMINE COMPLIANCE WITH THE RULES OF CIVIL PROCEDURE.	250.00/hr	*	187.50
10/23/2024	ML DISCUSSION WITH CLIENT [REDACTED] REVIEW DISCOVERY RESPONSES; MADE NOTES FOR THE FILE.	250.00/hr	*	125.00
11/6/2024	ML REVIEW OF VERIFIED AMENDED COMPLAINT AND MOTION FOR PRELIMINARY INJUNCTION FILED BY JESSE CHILDERS; EMAILED UPDATE TO CLIENTS [REDACTED]	250.00/hr	*	250.00

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
11/12/2024	ML REVIEW AMENDED COMPLAINT FILED BY JESSE CHILDERS; RESEARCHED NEW MEXICO CASE LAW AND STATUTES TO DETERMINE STRENGTHS OF CLAIMS FILED BY JESSE CHILDERS; PREPARED ANSWER, AFFIRMATIVE DEFENSES AND COUNTERCLAIMS;	250.00/hr	*	562.50
11/21/2024	ML DRAFTED RESPONSE TO MOTION FOR PRESENTMENT HEARING.	250.00/hr	*	187.50
12/5/2024	ML REVIEW REPLY FILED BY OPPOSING COUNSEL; WORKED ON ARGUMENT OUTLINE FOR UPCOMING HEARING.	250.00/hr	*	187.50
12/9/2024	ML REVIEW FILE AND PLEADINGS IN MATTER; DISCUSSION WITH DOUG ON CASE THEORY AND ORGANIZATION OF ARGUMENTS FOR IMPENDING HEARING.	250.00/hr	*	82.50
12/18/2024	ML TELEPHONE DISCUSSION WITH CLIENTS; REVIEW REPLY IN SUPPORT OF MOTION FOR PRESENTMENT ORDER.	250.00/hr	*	312.50
SUBTOTAL:				[9,285.00]
<u>2025</u>				
1/8/2025	ML WEST LAW RESEARCH SERVICES.		*	150.00
	ML RESEARCHED NEW MEXICO CASE LAW AND STATUTES [REDACTED]	250.00/hr	*	187.50
1/9/2025	ML REVIEWED FILE TO GET UPDATE ON STATUS OF CASE PENDING TO GIVE STATUS REPORT TO BOARD; REVIEWED RESEARCH AND CONDUCTED ADDITIONAL RESEARCH [REDACTED] ATTENDED BOARD MEETING.	250.00/hr	*	562.50
1/28/2025	AD RESEARCH AND REVIEW OF LAWS [REDACTED]	250.00/hr	*	325.00
1/29/2025	ML TELEPHONE CALL WITH CLIENT PERTAINING [REDACTED] CONFIRMED ATTENDANCE IN UPCOMING BOARD MEETING.	250.00/hr	*	82.50

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
	SEND ANOTHER EMAIL FOR FOLLOW UP RELATED TO ISSUES WITH THE CHANGES MADE TO THE ORDER AND THE OFFER OF SETTLEMENT; RECEIVED OFFER OF SETTLEMENT AND CHANGES TO ORDER; MADE CHANGES TO THE ORDER AND SENT TO OPPOSING COUNSEL; REVIEWED OFFER OF SETTLEMENT; [REDACTED]			
3/6/2025 - ML	RECEIVED AND REVIEWED ORDER SIGNED AND ENTERED BY THE JUDGE PERTAINING TO ATTORNEY FEES FOR ANDREW M. SANCHEZ; DRAFTED NOTICE OF SUBSTITUTION OF COUNSEL; DRAFTED LETTER OF WITHDRAWAL OF SERVICED FOR ANDREW M. SANCHEZ; REVIEWED QUESTIONS PRESENTED BY BOARD [REDACTED]; ATTENDED BOARD MEETING; MADE NOTES FOR THE FILE; BEGAN DRAFTING MOTION FOR DECLARATORY JUDGMENT.	250.00/hr	*	687.50
3/7/2025 - ML	BEGAN DRAFTING MOTION FOR DECLARATORY JUDGMENT; RESEARCHED CASE LAW, STATUTES AND RULES OF CIVIL PROCEDURE TO SUPPORT CLAIMS.	250.00/hr	*	375.00
3/12/2025 - ML	CORRESPONDENCE WITH OPPOSING COUNSEL RELATED TO NOTICE OF SUBSTITUTION OF COUNSEL AND OTHER MATTERS, REQUESTING UPDATE; INFORMED CLIENTS [REDACTED]; RESEARCHED NEW MEXICO CASE LAW, RULES OF CIVIL PROCEDURE AND ADMINISTRATIVE CODE TO DETERMINE IF PREVIOUS ATTORNEYS POSITION IS NECESSARY BEFORE FILING A NOTICE OF SUBSTITUTION OF COUNSEL.	250.00/hr	*	125.00
3/14/2025 - ML	RECEIVED CORRESPONDENCE FROM OPPOSING COUNSEL; REVIEWED CORRESPONDENCE TO DETERMINE STRENGTHS OF ARGUMENTS; BEGAN WORKING ON RESPONSE.	250.00/hr	*	395.00
3/18/2025 - ML	DISCUSSION WITH CLIENT [REDACTED] DISCUSSION REGARDING NEXT STEPS FORWARD.	250.00/hr	*	167.50
3/21/2025 - ML	DISCUSSION WITH JASMINE TO GET UPDATE FROM COURT REGARDING TRANSCRIPT FROM PREVIOUS HEARING; REVIEW EMAILS FROM CLIENT [REDACTED] [REDACTED] DISCUSSION WITH DOUG ON THE MATTER; DISCUSSION WITH CLIENT.	250.00/hr	*	375.00
4/9/2025 - ML	WORKED ON RESPONSE TO MOTION FOR PRESENTMENT ORDER FILED BY JESSE CHILDERS; RECEIVED AND LISTENED TO THE COURT RECORDING FOLLOWING THE HEARING HELD ON FEBRUARY 17, 2025, MAKING NOTES FOR THE FILE;	250.00/hr	*	1,355.00

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
	USED STATEMENTS FROM THE COURT IN THE PROPOSED ORDER AS TO BE PRESENTED BY IN THE RESPONSE TO THE MOTION FOR PRESENTMENT ORDER; FINALIZED MOTION FOR DECLARATORY JUDGEMENT; FINALIZED NOTICE OF SUBSTITUTION OF COUNSEL; REVIEWED NEW MEXICO STATUTES AND CASE LAW TO FIND RELEVANT AUTHORITY TO CITE IN SUPPORT OF PLEADINGS;			
4/10/2025 - ML	FINALIZED RESPONSE TO PRESENTMENT ORDER; FINALIZED PROPOSED ORDER TO BE INCLUDED WITH RESPONSE; ORGANIZED EXHIBITS TO BE USED IN RESPONSE; DISCUSSION WITH DOUG DETAILING THE NOTICE OF SUBSTITUTION OF COUNSEL AND MOTION FOR DECLARATORY JUDGEMENT; CHANGED NOTICE OF SUBSTITUTION OF COUNSEL TO MOTION FOR SUBSTITUTION OF COUNSEL, MAKING CITATIONS TO THE COURT RECORD FROM THE HEARING, THE ORDER ENTERED ON MARCH 4, 2025, AND THE CLOSE OF REPRESENTATION LETTER; FINALIZED ALL PLEADINGS; GAVE TO WIL TO FILE WITH THE COURT.	250.00/hr	*	895.00
4/29/2025 - ML	RECEIVED AND REVIEWED REPLY IN SUPPORT OF PRESENTMENT ORDER AS FILED BY OPPOSING PARTY; REVIEWED CASE LAW RELIED UPON IN REPLY TO DETERMINE RELEVANCY; RESEARCHED NEW MEXICO CASE LAW AND RULES OF PROFESSIONAL CONDUCT [REDACTED] WORKED ON ARGUMENT OUTLINE FOR UPCOMING HEARING ON MAY 9, 2025.	250.00/hr	*	250.00
5/1/2025 - ML	REVIEWED FILE IN PREPARATION FOR MONTHLY BOARD MEETING; ATTENDED BOARD MEETING TO DISCUSS THE NEXT STEPS FORWARD AND PLAN A MEETING TO DISCUSS CASE STRATEGY.	250.00/hr	*	500.00
5/7/2025 - ML	REVIEW PLEADINGS; WORKED ON ARGUMENT OUTLINE IN PREPARATION FOR HEARING SCHEDULED FOR MAY 9, 2025; PREPARED LIST OF POTENTIAL QUESTIONS TO ASK WITNESSES AT THE HEARING.	250.00/hr	*	312.50
5/8/2025 - ML	ATTENDED BOARD MEETING WITH CLIENTS [REDACTED] [REDACTED] REVIEW ANTICIPATED QUESTIONS WITH CLIENTS [REDACTED] WORKED ON ARGUMENT OUTLINE FOR THE HEARING.	250.00/hr	*	437.50
5/9/2025 - ML	FINAL REVIEW OF FILE PRIOR TO THE HEARING; FINALIZED ARGUMENT OUTLINES TO USE AT THE HEARING; ATTENDED HEARING; DISCUSSION WITH CLIENTS FOLLOWING THE HEARING; PREPARED AND FINALIZED PROPOSED ORDER FOLLOWING HEARING ON FEBRUARY 17, 2025, FINDING IN FAVOR OF THE	250.00/hr	*	1,437.50

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
	ASSOCIATION (THROUGH THE DEFENDANTS) AND REQUIRING ANDREW SANCHEZ TO BE REMOVED AS COUNSEL AND CONFLICTED FROM THE CASE; PREPARED ORDER PURSUANT TO JUDGES FINDINGS THAT JESSE CHILDERS AND THE OTHERS WRONGFULLY ELECTED ON JULY 5, 2024, WERE NOT ELECTED BECAUSE THE MEETING WAS NOT CALLED AND THERE WAS NO QUORUM PRESENT RENDING ANY VOTE VOID; GAVE BOTH ORDERS TO WIL TO FILE.			
5/13/2025 - ML	REVIEWED MOST RECENT EMAILS PROVIDED BY CLIENTS; DISCUSSION WITH CLIENT [REDACTED]	250.00/hr	*	187.50
5/16/2025 - ML	CORRESPONDENCE WITH ANDREW SANCHEZ REGARDING ANTICIPATED WITHDRAWAL OF COUNSEL; MADE CHANGES TO THE LETTER TO BE SENT ON BEHALF OF THE ASSOCIATION TO ALL MEMBERS, CORRECTING THE LETTER WRITTEN BY JESSE.	250.00/hr	*	250.00
5/19/2025 - ML	CORRESPONDENCE WITH ANDREW SANCHEZ; CORRESPONDENCE WITH JESSE CHILDERS REGARDING THE NEXT STEPS FORWARD AND THE PETITIONS RECEIVED FOR THE REMOVAL OF BOARD MEMBERS.	250.00/hr	*	187.50
- DWF	MEETING WITH MCKADE ABOUT ORDER AND EMAIL [REDACTED]	250.00/hr	*	250.00
5/21/2025 - ML	REVIEW ORDER FOLLOWING HEARING HELD ON MAY 9, 2025; SENT VIA EMAIL TO JESSE CHILDERS FOR HIS APPROVAL AS TO FORM AND REQUESTING UPDATE ON PREVIOUS EMAIL.	250.00/hr	*	62.50
5/27/2025 - ML	CORRESPONDENCE WITH OPPOSING PARTY.	250.00/hr	*	125.00
6/5/2025 - ML	FINALIZED MOTION AND ORDER FOR SUBSTITUTION OF PARTIES; CORRESPONDENCE WITH OPPOSING PARTY RELATED TO THE MOTIONS; DISCUSSION WITH CLIENT [REDACTED] [REDACTED] DISCUSSION REGARDING OPPOSING PARTIES RECENT COMMUNICATIONS; [REDACTED] ATTENDED THE BOARD MEETING; ATTENDED CLOSED BOARD MEETING;	250.00/hr	*	957.50

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
6/6/2025 - ML	DISCUSSION WITH JESSE CHILDERS RELATED TO THE MOTION FOR SUBSTITUTION OF PARTIES; NOTED APPROVAL; DISCUSSION WITH JASMINE TO FILE MOTION AND ORDER AS SOON AS POSSIBLE; REVIEWED LETTER TO BE SENT TO HORTON RANCHES; REVIEWED CC&RS.	250.00/hr	*	312.50
6/9/2025 - ML	REVIEWING EMAIL FROM BECKY SHEPARD; AND OTHER EMAILS FROM LANDOWNERS.	250.00/hr	*	145.00
6/12/2025 - ML	RECEIVED EMAIL FROM CLIENT [REDACTED] [REDACTED] REVIEWED EMAIL CORRESPONDENCE; COMPARED MESSAGE WITH THE ORDER FOLLOWING THE HEARING HELD ON FEBRUARY 17, 2025, TO DETERMINE IF SUCH STATEMENTS VIOLATED THE ORDER REQUIRING JESSE TO STOP ACTING AS IF HE WERE A BOARD MEMBER; RESEARCHED NEW MEXICO STATUTES AND CASE LAW TO DETERMINE IF A ORDER TO SHOW CAUSE WOULD BE APPROPRIATE.	250.00/hr	*	395.00
6/18/2025 - ML	RECEIVED AND REVIEWED NEW MOTIONS FILED BY JESSE CHILDERS; DISCUSSION WITH JESSE CHILDERS RELATED TO THE MOTIONS AND THE ORDER FOLLOWING THE HEARING HELD ON FEBRUARY 17, 2025; REQUESTING UPDATE ON HIS STATEMENT TO LANDOWNERS DECLARING HE WAS NOT A BOARD MEMBER AND ACKNOWLEDGING REMAINING BOARD MEMBERS AS THE LEGITIMATE BOARD.	250.00/hr	*	250.00
6/19/2025 - ML	RESEARCHED NEW MEXICO CASE LAW TO USE AS AUTHORITY TO RESPOND TO JESSE'S MOTION TO RECONSIDER AMENDED ORDER DENYING DEFENDANTS' MOTION FOR PRELIMINARY INJUNCTION; REVIEWED AUDIO LOG NOTES FROM HEARING HELD ON MAY 9, 2025; DRAFTED RESPONSE TO MOTION.	250.00/hr	*	395.00
6/23/2025 - ML	RECEIVED AND REVIEWED THREE ADDITIONAL MOTIONS FILED BY JESSE CHILDERS; RESEARCHED NEW MEXICO CASE LAW AND RULES OF CIVIL PROCEDURE TO DETERMINE STRENGTH OF MOTIONS; BEGAN WORKING ON RESPONSES TO ALL UNNECESSARY MOTIONS FILED BY JESSE.	250.00/hr	*	355.00
6/26/2025 - ML	DISCUSSION WITH CLIENTS [REDACTED] [REDACTED] DISCUSSED OPTIONS MOVING FORWARD; MADE NOTES FOR FILE; DISCUSSION WITH JASMINE TO FILE RESPONSE TO JESSE'S FIRST MOTION.	250.00/hr	*	187.50

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
6/27/2025	- ML	REVIEWED MOTION TO CLARIFY LEGAL STATUS OF BOARD, VOTING RIGHTS, AND TO ADDRESS CONTRADICTORY COMMUNICATION FROM DEFENDANTS; DRAFTED RESPONSE TO MOTION; RESEARCHED NEW MEXICO CASE LAW AND RULES OF CIVIL PROCEDURE TO CITE LEGAL AUTHORITY TO SUPPORT POSITION; REVIEW OTHER MOTIONS; CORRESPONDENCE WITH JESSE CHILDERS REQUESTING COPY OF THE BALLOT HE CLAIMS TO HAVE.	*	437.50
		250.00/hr		
	- ML	WESTLAW RESEARCH SERVICE.	*	250.00
6/30/2025	- DWF	REVIEW MOTION FOR SANCTIONS: WLR CONCERNING POTENTIAL ARGUMENTS [REDACTED] PROVIDE MODIFICATIONS TO MCKADE.	*	250.00
	- ML	RECEIVED AND REVIEW NEW, ADDITIONAL FRIVOLOUS FILINGS FROM JESSE CHILDERS; PREPARED RESPONSES TO TWO OF THE MOTIONS FILED BY JESSE CHILDERS; RESEARCHED NEW MEXICO CASE LAW, RULES OF CIVIL PROCEDURE AND STATUTES TO VERIFY LEGAL AUTHORITY CITED BY JESSE CHILDERS IN HIS VARIOUS PLEADINGS, AND TO FIND LEGAL AUTHORITY TO SUPPORT ARGUMENTS; REVIEWED ALL PLEADINGS AND MOTIONS FILED BY JESSE CHILDERS TO ENSURE THAT NO MOTIONS ARE BEING FORGOTTEN OR OVER LOOKED; BEGAN DRAFT MOTION FOR SANCTIONS TO BE FILED AGAINST JESSE CHILDERS FOR CONTINUOUSLY FILING FRIVOLOUS MOTIONS.	*	1,562.50
7/2/2025	- ML	RECEIVED AND REVIEWED THREE ORDERS DENYING THREE OF JESSE'S MOTIONS; REVIEWED MOTION FOR CLARIFICATION DRAFTED BY JESSE; RESEARCHED NEW MEXICO CASE LAW TO USE LEGAL AUTHORITY TO SUPPORT RESPONSE; GAVE TO JASMINE TO FILE RESPONSE.	*	437.50
7/3/2025	- ML	REVIEW DOCUMENTS AND EMAILS FROM JESSE CHILDERS; REVIEW LEGAL CITATIONS TO DETERMINE RELEVANCE; CORRESPONDENCE WITH JESSE CHILDERS; PREPARED FOR BOARD MEETING; ATTENDED BOARD MEETING.	*	687.50
7/8/2025	- ML	RECEIVED AND REVIEWED FOUR ORDERS FROM THE COURT; COMPARED ORDERS RECEIVED FROM THE COURT TO THE MOTIONS FILED BY JESSE CHILDERS TO DETERMINE WHAT, IF ANY, MOTIONS ARE STILL ONGOING; DISCUSSION WITH JASMINE TO SEND ORDERS TO CLIENT.	*	187.50

			<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
7/9/2025	- ML	DISCUSSION WITH CLIENT [REDACTED] DISCUSSED; UPDATES IN THE CASE; MADE NOTES FOR FILE;	250.00/hr	*	105.00
7/10/2025	- ML	DISCUSSION WITH CLIENT [REDACTED]	250.00/hr	*	167.50
7/11/2025	- ML	RECEIVED AND REVIEWED EMAIL CORRESPONDENCE [REDACTED] RECEIVED AND REVIEWED EMAIL AND REQUESTS FROM JESSE CHILDERS; DRAFTED AND FINALIZED RESPONSE TO SETTLEMENT OFFER; CORRESPONDENCE WITH JESSE CHILDERS.	250.00/hr	*	562.50
7/17/2025	- ML	RECEIVED AND REVIEWED RESPONSE TO MOTION FOR SANCTIONS; BEGAN DRAFTING REPLY IN SUPPORT OF MOTION FOR SANCTIONS; DISCUSSION WITH OPPOSING COUNSEL REGARDING A REPLY HE INTENDS TO FILE EVEN THOUGH HIS MOTION HAS ALREADY BEEN DENIED; PREPARED FOR BOARD MEETING; ATTENDED BOARD MEETING.	250.00/hr	*	937.50
7/18/2025	- ML	FINALIZED REPLY IN SUPPORT OF MOTION FOR SANCTIONS; DISCUSSION WITH JASMINE TO FILE ALONG WITH NOTICE OF COMPLETION OF BRIEFING AND REQUEST FOR HEARING.	250.00/hr	*	187.50
7/22/2025	- ML	RECEIVED AND REVIEWED ORDER TO SHOW CAUSE AND HEARING SET FOR AUGUST 12, 2025.	250.00/hr	*	62.50
7/25/2025	- ML	RECEIVED AND REVIEWED INVOICES; REVIEWED REQUEST FOR RECORDS FROM JESSE; RECEIVED AND REVIEWED EMAIL CORRESPONDENCE FROM CLIENT; PREPARED AND SENT EMAIL CORRESPONDENCE TO JESSE, INFORMING HIM THAT ALL COMMUNICATION TO THE BOARD OF DIRECTORS SHALL BE SENT DIRECTLY TO ME, ANY OTHER EFFORTS WILL NOT BE ACKNOWLEDGED; REVIEWED NOTICE OF HEARING; REVIEWED REPLY FILED BY JESSE TO MOTION TO CLARIFY LEGAL STATUS OF BOARD; MADE NOTES FOR ARGUMENT OUTLINE FOR HEARING SCHEDULED FOR AUGUST 12, 2025.	250.00/hr	*	395.00
7/30/2025	- ML	DISCUSSION WITH JASMINE TO ENSURE REPLY IN SUPPORT OF MOTION FOR SANCTIONS AND ORDER TO SHOW CAUSE IS TIMELY FILED, ALONG WITH NOTICE OF COMPLETION OF BRIEFING.	250.00/hr	*	82.50

		<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
8/6/2025 - ML	RECEIVED AND REVIEWED EMAIL AND DOCUMENTS FROM JESSE CHILDERS; REVIEWED NEW MEXICO STATUTES [REDACTED] [REDACTED] WORKED ON RESPONSE TO JESSE CHILDERS.	250.00/hr	*	250.00
8/7/2025 - ML	REVIEW FILINGS IN PREPARATION FOR MEETING; REVIEW AGENDA; ATTENDED BOARD MEETING; MADE NOTES FOR FILE; UPDATED ARGUMENT OUTLINE.	250.00/hr	*	937.50
8/8/2025 - ML	REVIEWED PROPERTY INFORMATION FROM CATRON COUNTY REGARDING JESSE CHILDERS' LOT OWNERSHIP STATUS; ATTEMPTED TO CONTACT OPPOSING PARTY TO DISCUSS OWNERSHIP STATUS; RESPONDED TO JESSE CHILDERS REQUEST FOR INFORMATION, LETTING HIM KNOW THAT NO INFORMATION WILL BE PROVIDED BECAUSE HE IS NO LONGER A LOT OWNER AND DEMANDING THAT HE PROVIDE PROOF THAT HE IS A LOT OWNER, IF APPLICABLE; ATTEMPTED TO CONTACT ANDREW SANCHEZ TO DISCUSS TOTAL BILLING AND TO DETERMINE IF HE WOULD BE SENDING A BILL TO THE ASSOCIATION; MADE NOTES FOR ARGUMENT OUTLINE.	250.00/hr	*	437.50
8/11/2025 - ML	REVIEWED FILE; WORKED ON ARGUMENT OUTLINE; RESEARCHED NEW MEXICO CASE LAW AND STATUTES [REDACTED]	250.00/hr	*	437.50
8/12/2025 - ML	FINAL PREPARATION FOR HEARING; REVIEWED FILE; REVIEWED NEW MEXICO CASE LAW, STATUTES, AND RULES OF CIVIL PROCEDURE TO USE AS AUTHORITY TO SUPPORT ARGUMENTS; PREPARED AND FINALIZED ARGUMENT OUTLINE; GAVE MOCK ARGUMENTS TO LEGAL ASSISTANT; ATTENDED HEARING; MET WITH CLIENTS FOLLOWING THE HEARING TO DISCUSS THE OUTCOME AND THE NEXT STEPS FORWARD; MADE NOTES FOR FILE FOR THE ORDER TO BE PREPARED.	250.00/hr	*	1,687.50
8/14/2025 - ML	REVIEW NOTES FROM HEARING; PREPARED ORDER GRANTING MOTION FOR SANCTIONS.	250.00/hr	*	437.50
8/20/2025 - ML	FINAL REVIEW OF NOTES FROM HEARING; MADE CHANGES TO PROPOSED ORDER; CORRESPONDENCE WITH JESSE CHILDERS RELATED TO THE ORDER.	250.00/hr	*	105.00
SUBTOTAL:				[27,910.00]

	<u>Hours</u>	<u>Amount</u>
For professional services rendered	147.38	\$37,195.00

Additional Charges :

<u>Qty/Price</u>	<u>Tax#</u>
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2024

7/26/2024 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - ENTRY OF APPEARANCE; AND MOTION TO DISMISS FOR LACK OF STANDING; MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM; MOTION TO STRIKE; AND COMPLAINT FOR DECLARATORY JUDGMENT AND DEFAMATION	1 9.00	*	9.00
9/19/2024 - VR	PRIORITY MAIL TO ANDREW SANCHEZ	1 8.50	*	8.50
9/20/2024 - JJ	EFILE FEE- DEFENDANTS' MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION AND CERTIFICATE OF SERVICE FOR DEFENDANTS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF JESSE CHILDERS, AND DEFENDANTS' FIRST SET OF INTERROGATORIES TO PLAINTIFF JESSE CHILDERS.	1 9.00	*	9.00
10/3/2024 - JJ	EFILE FEE- REPLY IN SUPPORT OF MOTION TO DISMISS	1 9.00	*	9.00
10/21/2024 - JJ	EFILE FEE- NOTICE OF COMPLETION OF BRIEFING (MOTION TO DISMISS, ET AL), NOTICE OF COMPLETION OF BRIEFING (MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION), REQUEST FOR HEARING AND DEFENDANTS' REPLY IN SUPPORT OF MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION	1 18.00	*	18.00
11/12/2024 - JJ	EFILE FEE- ANSWER TO VERIFIED FIRST AMENDED COMPLAINT FOR BREACH OF CONTRACT, BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING, NEGLIGENT MISREPRESENTATIONS, UNJUST ENRICHMENT, PRIMA FACIE TORT, INDEMNIFICATION, FRAUD AND INJUNCTIVE RELIEF, AND COUNTERCLAIMS, AND DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION	1 27.00	*	27.00
11/27/2024 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PRESENTMENT OF ORDER	1 9.00	*	9.00

		<u>Qty/Price</u>	<u>Tax#</u>	<u>Amount</u>
SUBTOTAL:				[89.50]
<u>2025</u>				
2/27/2025 - VR	COPYING CHARGE-SECOND JUDICIAL DISTRICT COURT - AUDIO CD REQUEST	1 4.00	*	4.00
4/11/2025 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR PRESENTMENT OF ORDER; AND NOTICE OF SUBSTITUTION OF COUNSEL	1 9.00	*	9.00
4/14/2025 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - REQUEST FOR EXPEDITED HEARING	1 9.00	*	9.00
6/6/2025 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - UNOPPOSED MOTION FOR SUBSTITUTION OF PARTY UNDER RULE 1-021 NMRA	1 9.00	*	9.00
6/26/2025 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - RESPONSE TO PLAINTIFF'S MOTION TO RECONSIDER AMENDED ORDER DENYING DEFENDANT'S MOTION FOR PRELIMINARY INJUNCTION	1 9.00	*	9.00
7/3/2025 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - RESPONSE TO PLAINTIFF'S MOTION FOR CLARIFICATION OF VOTING RULES AND TO PROTECT THE INTEGRITY OF THE ELECTION PROCESS; AND OPPOSED MOTION FOR SANCTIONS AND ORDER TO SHOW CAUSE	1 9.00	*	9.00
7/30/2025 - VR	EFILE FEE-CATRON COUNTY DISTRICT COURT - REPLY IN SUPPORT OF MOTION FOR SANCTIONS; AND NOTICE OF COMPLETION OF BRIEFING (MOTION FOR SANCTIONS)	1 9.00	*	9.00
SUBTOTAL:				[58.00]
Total costs				\$147.50



