

Electronically Filed: February 27, 2019

1 **ANDERSEN LAW FIRM, LTD.**
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10 *Special Litigation Counsel for Shelley Krohn, Chapter 7 Trustee*

11 **UNITED STATES BANKRUPTCY COURT**
12 **DISTRICT OF NEVADA**

13 In re:

Case No.: 16-16655-BTB
Chapter 7

14 ROBERT C. GRAHAM, LTD. fdba ROBERT
15 GRAHAM & ASSOCIATES; fdba LAWYERS
16 WEST

**DECLARATION OF RYAN A.
ANDERSEN IN SUPPORT OF FIRST
AND FINAL APPLICATION OF
ANDERSEN LAW FIRM, LTD. FOR
ALLOWANCE OF COMPENSATION
FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES
INCURRED**

17 Debtor.

Hearing Date: April 10, 2019
Hearing Time: 2:00 p.m. Pacific time

18 I, Ryan A. Andersen, hereby state as follows under penalty of perjury:

19 1. I am over the age of 18 and mentally competent.

20 2. I make this declaration in support of the *First and Final Application of Andersen Law*
21 *Firm, Ltd. for Allowance of Compensation for Services Rendered and Reimbursement of the Expenses*
22 *Incurred* (“Application”), filed by Andersen Law Firm, Ltd. (“Firm”) in the above-captioned bankruptcy
23 case (“Case”).
24
25
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1 3. I am the managing partner of the Firm. Through the Firm, I am actively involved in
2 representing Shelley D. Krohn, Chapter 7 Trustee (“Trustee”) as special litigation counsel in the above-
3 mentioned bankruptcy case (“Case”).

4 4. I have personal knowledge of the facts stated herein, and I could and would testify to
5 the same if called upon to do so.

6 5. I hereby certify that: (i) I have read the Application; and (ii) to the best of my knowledge,
7 information, and belief, and after conducting a reasonable inquiry, the compensation for services
8 rendered and reimbursement for expenses incurred that is requested therein is in conformity with
9 applicable law, the Guidelines for Compensation and Reimbursement of Professionals in Region 17 as
10 promulgated by the Office of the United States Trustee, the Guidelines for Reviewing Applications for
11 Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330.

12 6. Attached hereto as **Exhibit 1** is a true and correct copy of the billing statement in this
13 matter for the period of May 25, 2017 through February 19, 2019 (“Application Period”). The billing
14 statement contains the Firm’s contemporaneous time records for the matter, and such records detail the
15 legal services rendered by the Firm and the time spent by the Firm in performing such services. I have
16 reviewed the time records contained within **Exhibit 1**, and such time records are true and accurate in
17 all material respects.

18 7. Except for the Application, the Firm has filed no previous requests for allowance of
19 compensation for services rendered and reimbursement of expenses incurred. The Firm has not
20 received any payment on account of its services set forth in **Exhibit 1** from the Debtor or any other
21 person or entity prior to the date of this Declaration.

22 8. The legal services rendered and the expenses incurred are on a contingent fee basis, and
23 are all reasonable in amount and were necessary to the administration of the Case.

24 9. The Firm has neither received nor been promised any payments from any source for
25 services rendered to the Trustee in the Case. There is no agreement or understanding for the Firm to
26 receive payments from any source other than the Trustee.

27

EXHIBIT 1

EXHIBIT 1

EXHIBIT 1



INVOICE

Invoice # 1214
Date: 02/22/2019
Due On: 03/24/2019

101 Convention Center Drive, Suite 600
Las Vegas, Nevada 89109
United States
Phone: 702-522-1992
Email: randers@andersenlawlv.com
www.andersenlawlv.com

Shelley Krohn

52.00004

Robert C. Graham, Ltd. Special Counsel Engagement

Services

Date	Attorney	Description	Hours	Rate	Total
06/05/2017	RAA	Litigation: Review of electronic document file.	4.90	\$0.00	\$0.00
06/12/2017	RAA	Litigation: Attention to issues related to preparation of answer.	2.60	\$0.00	\$0.00
06/14/2017	RAA	Litigation: Draft answer to complaint for rescission and declaratory relief	6.00	\$0.00	\$0.00
06/19/2017	RAA	Litigation: Meeting with Delwyn Webber and her counsel.	1.60	\$0.00	\$0.00
11/30/2017	RAA	Litigation: Review documents and respond to request for production of documents.	4.50	\$0.00	\$0.00
12/13/2017	AB	Litigation: Drafting discovery requests related to insurance policy	2.20	\$0.00	\$0.00
12/15/2017	AB	Litigation: Drafting discovery requests	1.60	\$0.00	\$0.00
12/18/2017	AB	Litigation: Drafting discovery requests	2.00	\$0.00	\$0.00
12/19/2017	AB	Litigation: Revising discovery requests	1.60	\$0.00	\$0.00
12/20/2017	AB	Litigation: Revising discovery requests	0.80	\$0.00	\$0.00
03/06/2018	RAA	Litigation: Emails regarding insurance litigation strategy. (.3) Phone call with client regarding same. (.7)	1.00	\$0.00	\$0.00
03/08/2018	RAA	Litigation: Phone call with opposing counsel.	0.50	\$0.00	\$0.00

09/20/2018	RAA	Litigation: Review documents and begin drafting responses to requests for admission and interrogatories.	2.00	\$0.00	\$0.00
09/24/2018	RAA	Litigation: Emails and phone call with opposing counsel regarding settlement. (.4) Phone call with co-counsel regarding same. (.3)	0.70	\$0.00	\$0.00
09/24/2018	RAA	Litigation: Begin drafting responses to discovery.	1.60	\$0.00	\$0.00
09/25/2018	RAA	Litigation: Phone call with client regarding settlement. (.4) Email with opposing counsel regarding same. (.4)	0.80	\$0.00	\$0.00
09/26/2018	RAA	Litigation: Emails with opposing counsel regarding settlement. (.2) Phone call with Sidorkina regarding same. (.4)	0.60	\$0.00	\$0.00
10/15/2018	AB	Litigation: Drafting 9019 Motion	2.00	\$0.00	\$0.00
10/18/2018	RAA	Litigation: Phone call regarding settlement.	0.30	\$0.00	\$0.00
10/31/2018	AB	Litigation: Drafting 9019 Motion	0.70	\$0.00	\$0.00
11/05/2018	AB	Litigation: Drafting 9019 Motion	2.30	\$0.00	\$0.00
11/06/2018	AB	Litigation: Revising 9019 Motion	1.20	\$0.00	\$0.00
11/14/2018	RAA	Litigation: Revise and edit settlement agreement.	1.10	\$0.00	\$0.00
11/14/2018	RAA	Litigation: Revise and edit settlement motion.	0.80	\$0.00	\$0.00
11/14/2018	AB	Litigation: Revising 9019 Motion	1.10	\$0.00	\$0.00
11/16/2018	AB	Litigation: Revising 9019 Motion	2.30	\$0.00	\$0.00
11/19/2018	AB	Litigation: Revising 9019 Motion	3.10	\$0.00	\$0.00
11/20/2018	RAA	Litigation: Revise and edit Rule 9019 motion.	0.40	\$0.00	\$0.00
11/20/2018	AB	Litigation: Revising 9019 Motion	1.10	\$0.00	\$0.00
11/26/2018	RAA	Litigation: Revise and edit motion for approval of settlement and supporting pleadings.	0.40	\$0.00	\$0.00
12/04/2018	RAA	Litigation: Revise and edit settlement agreement.	0.40	\$0.00	\$0.00
12/11/2018	RAA	Litigation: Emails concerning status of settlement.	0.20	\$0.00	\$0.00
01/08/2019	RAA	Litigation: Attention to details regarding settlement, including emails to client and opposing counsel.	0.60	\$0.00	\$0.00
02/12/2019	RAA	Litigation: Prepare for hearing on motion to approve settlement. (.5) Appearance at hearing. (.9)	1.40	\$0.00	\$0.00
02/13/2019	RAA	Litigation: Finalize order approving settlement.	0.30	\$0.00	\$0.00
02/15/2019	TK	Fee/Employment Applications: Drafting first and final fee application	3.80	\$0.00	\$0.00

02/22/2019	RAA	Fee/Employment Applications: Revise and edit first and final fee application.	0.50	\$0.00	\$0.00
02/22/2019	RAA	Contingency Fee: 40.0% of \$11,583.00: Contingency award per order granting employment.	1.00	\$4,633.20	\$4,633.20
			Matter Total Hours		60.0
			Services Subtotal		\$4,633.20

Expenses

Date	Description	Quantity	Rate	Total
01/11/2019	Postage: Motion for Approval of Settlement	1.00	\$251.45	\$251.45
01/11/2019	Copies: Motion for Approval of Settlement	1.00	\$26.75	\$26.75
Expenses Subtotal				\$278.20
Client Total Hours				60.0
Subtotal				\$4,911.40
Total				\$4,911.40

Detailed Statement of Account**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1214	03/24/2019	\$4,911.40	\$0.00	\$4,911.40
Outstanding Balance				\$4,911.40
Total Amount Outstanding				\$4,911.40