

Michael J. Van Zandt (Cal. SBN 096777)
Elizabeth P. Ewens (Cal. SBN 213046)
McQUAID BEDFORD & VAN ZANDT LLP
221 Main Street, 16th Floor
San Francisco, CA 94105
Telephone: 415/905-0200
Facsimile: 415/905-0202

ROGER D. LING (Idaho SBN 1018)
LING, ROBINSON & WALKER
P.O. Box 396
Rupert, Idaho 83350
Telephone: (208) 436-4717
Facsimile: (208) 436-6804

Attorneys for Joyce Livestock

**IN THE DISTRICT COURT OF THE FIFTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF TWIN FALLS**

In Re SRBA

Subcase Numbers 55-10135, 55-11061,
55-11385 and 55-12452

Case No. 39576

**DECLARATION OF MICHAEL J. VAN
ZANDT IN SUPPORT OF JOYCE
LIVESTOCK'S MOTION FOR
ATTORNEYS' FEES**

1 I, Michael J. Van Zandt, declares as follows:

2 1. I am a partner with the firm McQuaid Bedford & Van Zandt, attorneys for record
3 herein. I have personal knowledge of the matters stated herein and if called as a witness could and
4 would testify competently thereto.

5 2. This is an action for the adjudication of instream stockwater rights belonging to
6 Joyce Livestock located within a preferential grazing allotment in the state of Idaho, and an
7 adjudication of instream stockwater rights claimed by the United States within the same grazing
8 allotment. Joyce Livestock's claim was granted with an April 26, 1935 priority. The United States'
9 claims were denied in their entirety.

10 3. This case requires distinctive knowledge and specialized skill in the area of natural
11 resources law, specifically, the enforcement, prosecution and defense of water rights.

12 4. Joyce Livestock incurred fees and expenses in this lengthy litigation. A detailed
13 record of fees incurred is attached hereto as Exhibit A. Such fees and expenses were necessary and
14 appropriate and the services for which they have been charged were actually and necessarily
15 performed.

16 5. This award of attorneys' fees is appropriate in that the United States' position was not
17 substantially justified and required lengthy litigation of some seven and one half (7 ½) years,
18 concluding in the Applicant's successful opposition to water rights improperly claimed by the
19 United States and Applicant's successful defense of Joyce Livestock's claimed water rights.
20 Counsel is requesting only those attorney fees from the judicial phase of this litigation. It would be
21 inequitable for Joyce Livestock to bear the cost of litigating this matter where the position of the
22 United States throughout all phases of the litigation was without merit.

23 6. The amount of attorneys' fees requested is supported by the fact that this action
24 involved the filing of numerous motions and briefs, including but not limited to summary judgment
25 briefing, pre-trial memorandum, post-trial memorandum, briefs filed in support of Motion to Alter
26 or Amend Special Master's Report and Recommendation, and briefs filed in support of Challenge.
27 This action required court appearances by attorneys for Joyce Livestock and appearances at pre-trial

1 conferences, trial, oral argument on Joyce Livestock's Motion to Alter or Amend, and oral argument
2 on Joyce Livestock's Challenge. The record involved in this action is voluminous, requiring
3 attorneys for Joyce Livestock to expend time in gathering evidence and coordinating exhibits as well
4 as extensive review of voluminous documents. The record of fees and expenses set forth in Exhibit
5 A is an accurate and correct summary of what was billed to Joyce Livestock. My current billing rate
6 of \$360.00 per hour and that of my colleagues from \$295.00 to \$360.00 is in accordance with local
7 market standards in the San Francisco Bay Area.

8 8. As reflected on the actual bills sent to the client, the firm's billing rates varied during
9 the length of this litigation, beginning in 2000 to the present. Each timekeeper's rate is listed on the
10 last page of each bill, on Exhibit A. As reflected on Exhibit A, the bills have been redacted so any
11 irrelevant, unrelated work, attorney-client communication, or attorney work product is not exhibited.

12 9. I have extensive experience in the areas of water rights adjudication and natural
13 resources law. I have practiced law for over twenty-five (25) years and have significant experience
14 in the area of water rights adjudications and environmental disputes before both state and federal
15 courts. I am counsel or have been on a major land use and water rights cases before the United
16 States District Courts in Nevada, California, Arizona and Idaho, the United States Court of Federal
17 Claims and the Ninth and Federal Circuit Courts of Appeal, which cases involves highly specialized
18 issues of federal law relating to water rights holders.

19 10. My colleague Mr. Craig Pridgen has dedicated his practice to environmental, land
20 use and real property issues with a particular focus on water law. Mr. Pridgen has over 30 years
21 experience in complex water law, land use law and real property litigation before a wide array of
22 federal and state courts and administrative tribunals.

23 11. My partner, Ms. Elizabeth Ewens has considerable experience in the areas of
24 water rights adjudications and natural resources law. Ms. Ewens has practiced law for over ten (10)
25 years and has represented clients through all stages of litigation, both at the trial and appellate court
26 levels.

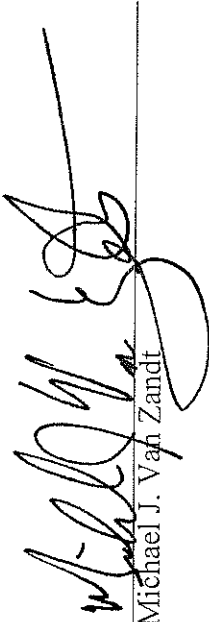
27 12. My former associate, Mr. Anthony Francois, also has experience in complex water

1 law and land use litigation and provided significant litigation support during this litigation. My
2 paralegals, Ms. Samantha Hubley and Ms. Laurie Paffhausen, also provided valuable support during
3 all phases of this litigation.

4 11. The attorneys and paralegals' fees for the preparation and argument of this motion for
5 attorneys' fees and the reply are estimated to be 10 hours at \$360.00 per hour for myself, 40 hours at
6 \$300.00 per hour for Ms. Elizabeth Ewens, and 20 paralegal hours at \$160.00 per hour for Ms.
7 Laurie Paffhausen, for a total of \$18,800.00.

8 I declare under penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct.

10 Executed this 16th day of August, 2005 at San Francisco, California.

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Michael J. Van Zandt





MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
July 13, 2005
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 06/30/2005,
PRIOR BALANCES, AND PAYMENTS THROUGH 07/13/2005

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0001



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BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL 415/905-0200
FAX 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
July 13, 2005
Our File Number: 21381-001
Invoice Number: 58348

In Re SRBA, Case No. 39576

REDACTED

STATEMENT FOR PERIOD THROUGH 06/30/2005

Previous Balance

Services Rendered

			Hours	
06/09/2005	RDH	Review file regarding supplemental opening brief on challenge.	0.70	119.00
	EPE	Communication with M. Van Zandt and Terri regarding oral argument and communication with client regarding same.	0.20	60.00
06/14/2005	RDH	Review file for U.S. exhibit list regarding grazing application filed by Joyce brothers.	0.80	136.00
	EPE	Telephone conference with M. Van Zandt regarding oral argument; Prepare for oral argument on challenge.	3.20	960.00
06/15/2005	EPE	Continue preparation for oral argument on challenge; Travel to Twin Falls, Idaho for oral argument; Argue Joyce Livestock's Challenge of Special Master's Recommendation; Telephone conference with M. Van Zandt regarding same.	8.20	2,460.00
06/20/2005	EPE	Telephone conference with M. Van Zandt regarding oral argument on challenge.	0.20	60.00
		For Current Services Rendered	13.30	3,795.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Elizabeth Ewens	11.80	\$300.00	\$3,540.00
Rob D. Hyman	1.50	170.00	255.00

JL 0002

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2

July 13, 2005

Our File Number: 21381-001

Invoice Number: 58348

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JL 0003

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221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
June 15, 2005
Our File Number: 21381-001
Invoice Number: 57512

In Re SRBA, Case No. 39576

REDACTED

STATEMENT FOR PERIOD THROUGH 05/31/2005

Previous Balance

Services Rendered

		Hours	
05/02/2005	EPE Continue drafting reply brief.	1.40	420.00
05/04/2005	MVZ Confer with Ms. Ewens regarding reply brief.	0.75	270.00
	EPE Continue drafting reply brief on challenge.	6.10	1,830.00
05/05/2005	RDH Review file regarding transfers of grazing permits.	1.90	323.00
	MVZ Review and revise reply brief; confer with Ms. Ewens; edit and finalize brief; review exhibits; work with paralegal.	2.25	810.00
	EPE Continue drafting reply brief; discuss same with M. Van Zandt.	6.90	2,070.00
	For Current Services Rendered	19.30	5,723.00

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	14.40	\$300.00	\$4,320.00
Michael J. Van Zandt	3.00	360.00	1,080.00
Rob D. Hyman	1.90	170.00	323.00

JL 0004

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
June 15, 2005
Our File Number: 21381-001
Invoice Number: 57512

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JL 0005

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221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
Our File Number: April 12, 2005
21381

BALANCE INCLUDES CURRENT WORK THROUGH 03/31/2005,
PRIOR BALANCES, AND PAYMENTS THROUGH 04/12/2005

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0006



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL 415/905-0200
FAX 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
April 12, 2005
Our File Number: 21381-001
Invoice Number: 55504

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 03/31/2005

REDACTED

Previous Balance

Services Rendered

		Hours
03/01/2005	RDH Legal Research RE: Section 661 Cases.	1.45 203.00
03/02/2005	RDH Legal Research RE: Section 661 cases.	1.65 231.00
	MVZ Confer with Mr. Hyman regarding research and federal agency claims and compensability; review summaries.	0.65 221.00
	MVZ Telephone call from Ms. Ewens regarding supplemental brief.	0.50 170.00
	EPE Continue drafting Supplemental Opening Brief.	6.40 1,760.00
03/03/2005	RDH Prepare Memo Re: Application of the Mining Act to Appropriation of Water.	4.10 574.00
	RDH Legal Research RE: Section 661 Cases.	0.90 126.00
	MVZ Confer with Mr. Hyman regarding research on 43 USC section 661; telephone call from Ms. Ewens; review and revise brief; research memorandum from Mr. Hyman; edit brief.	4.15 1,411.00
	EPE Complete draft Supplemental Opening Brief; discuss same with M. Van Zandt.	4.80 1,320.00
03/04/2005	RDH Legal Research RE: Section 661 Cases.	1.60 224.00
	EPE Review final Supplemental Opening Brief; discuss same with M. Van Zandt.	0.60 165.00
03/07/2005	RDH Legal Research RE: Section 661 Cases.	0.30 42.00
	RDH Legal Research RE: Section 4654 Cases.	1.30 182.00

JL 0007

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
April 12, 2005
Our File Number: 21381-001
Invoice Number: 55504

			Hours	
03/09/2005	RDH	Legal Research RE: Section 4654 Cases.	1.10	154.00
03/10/2005	RDH	Legal Research RE: Attorneys Fees.	0.60	84.00
		For Current Services Rendered	30.10	6,867.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Elizabeth Ewens	11.80	\$275.00	\$3,245.00
Michael J. Van Zandt	5.30	340.00	1,802.00
Rob D. Hyman	13.00	140.00	1,820.00

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San Francisco CA 94105-1936
TEL 415/905-0200
FAX 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
March 07, 2005
Our File Number:
21381

BALANCE INCLUDES CURRENT WORK THROUGH 02/28/2005,
PRIOR BALANCES, AND PAYMENTS THROUGH 03/07/2005

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0009



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VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
March 07, 2005
Our File Number: 21381-001
Invoice Number: 54313

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 02/28/2005

REDACTED

Previous Balance

Services Rendered

			Hours	
02/01/2005	NAM	Draft letter to client regarding buy out program.	0.43	53.75
	MVZ	Priority of possession issue and effect on water rights.	0.75	255.00
02/03/2005	MVZ	Review and revise permit buyout letter.	0.10	34.00
02/04/2005	MVZ	Telephone call to Ms. Ewens regarding settlement with U.S. based upon patent date.	0.45	153.00
02/07/2005	MVZ	Order from Judge Melanson regarding supplemental briefs; telephone call to Ms. Ewens.	0.45	153.00
	EPE	Communication with MargaretAnn Franz regarding analysis of grazing applications as they relate to priority date.	0.20	55.00
02/08/2005	MAF	Prepare instream analysis.	7.75	1,085.00
02/09/2005	MVZ	Confer with Ms. Ewens regarding status of brief; analyze issues.	1.25	425.00
	MAF	Perform instream analysis; confer with Ms. Ewens re same.	10.25	1,435.00
	EPE	Conference with MargaretAnn Franz regarding analysis of evidence demonstrating prior use of grazing allotments.	0.30	82.50
02/10/2005	MVZ	Review new grazing documents received from Public Lands regarding priority date and use.	0.85	289.00
	MAF	Perform instream analysis.	9.50	1,330.00
02/11/2005	MAF	Perform instream analysis.	10.25	1,435.00

JL 0010

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
March 07, 2005
Our File Number: 21381-001
Invoice Number: 54313

		Hours
02/12/2005	MAF Perform instream analysis.	1.75 245.00
02/14/2005	MAF Telephone call with Ms. Ewens; file research re chain of title.	1.00 140.00
	EPE Begin review of analysis of JOyce instream claims and correlation with grazing applications prepared by MargaretAnn Franz; telephone conference with M. Franz regarding same.	0.80 220.00
02/15/2005	RDH Legal Research RE: water rights appropriation on public land	0.60 84.00
02/16/2005	MAF Copy US trial exhibits for Ms. Ewens.	1.25 175.00
	EPE Communication with MargaretAnn regarding evidence of pre-1934 use of rangeland; work on supplemental opening brief.	0.50 137.50
02/17/2005	SXR Research using Westlaw re: Vested Water Rights & Appropriation. Compile research re: the same.	0.75 120.00
	MVZ Confer with paralegal regarding review of all cases citing 43 USC section 661.	0.25 85.00
02/18/2005	RDH Legal research re: appropriation of water.	1.20 168.00
02/22/2005	RDH Legal research re: appropriation of water.	3.00 420.00
02/23/2005	RDH Legal research re: appropriation of water.	1.50 210.00
02/24/2005	RDH Legal research re: appropriation of water.	1.90 266.00
02/25/2005	RDH Legal research re: appropriation of water.	1.85 259.00
02/28/2005	RDH Legal research re: Section 661 cases.	1.90 266.00
	MAF File organization.	0.25 35.00
	For Current Services Rendered	61.03 9,615.75

	Recapitulation	Hours	Rate	Total
Timekeeper				
Elizabeth Ewens		1.80	\$275.00	\$495.00
Nathan A. Metcalif		0.43	125.00	53.75
Michael J. Van Zandt		4.10	340.00	1,394.00
Samantha L. Hubley		0.75	160.00	120.00
Margaret Anne Franz		42.00	140.00	5,880.00
Rob D. Hyman		11.95	140.00	1,673.00

JL 0011

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
March 07, 2005
Our File Number: 21381-001
Invoice Number: 54313

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221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
February 04, 2005
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 01/31/2005,
PRIOR BALANCES, AND PAYMENTS THROUGH 02/04/2005

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0013



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221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL 415/905-0200
FAX 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
February 04, 2005
Our File Number: 21381-001
Invoice Number: 53529

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 01/31/2005

Previous Balance

REDACTED

Services Rendered

	Hours	
01/18/2005 MVZ Research on Grazing Regulations.	1.75	595.00
01/19/2005 MVZ Continue research on Grazing Regulations; confer with Ms. Ewens regarding notice of appeal; review grazing application and discovery.	1.35	459.00
01/20/2005 MVZ Continue research on early grazing regulations; review Interior Decisions on Priority of Right.	1.55	527.00
01/21/2005 EPE Telephone conference with L. Brown regarding briefing schedule and the possibility of settlement.	0.10	27.50
01/24/2005 MVZ Continue review and research of Interior Decisions for priority under the Taylor Grazing Act.	1.25	425.00
EPE Draft unopposed motion to file supplemental opening brief and unopposed motion to amend scheduling order; communication with L. Brown regarding same; communication with M. Van Zandt and S. Strickland regarding filing; review correspondence from R. Ling; telephone conference with M. Van Zandt regarding same and analysis of grazing applications with correlation to chain of title.	1.60	440.00
01/25/2005 MVZ Continue review of IBLA decision on Taylor Grazing Act and ability to affect water rights.	1.25	425.00
EPE Communication with L. Brown and M. Van Zandt regarding scheduling and motion for attorneys fees.	0.30	82.50
01/26/2005 MVZ Confirm with Mr. Lucke on theories re possessory interest and easements.	0.45	153.00
EPE Telephone call to R. Ling.	0.10	27.50

JL 0014

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
February 04, 2005
Our File Number: 21381-001
Invoice Number: 53529

		Hours	
01/27/2005	MVZ Work on BLM documents regarding Taylor Grazing Act, preference rights and easements.	1.25	425.00
01/28/2005	MVZ Continue research on Interior decisions, cases on Mining Act and local law and custom.	1.15	391.00
01/31/2005	NAM Research grazing permit buy out legislation.	0.40	50.00
	MVZ Research on Grazing AUM buyout program; confer with Mr. Metcalf and direction to prepare letters to client; research valid enforceable rights under FLPMA.	0.35	119.00
	For Current Services Rendered	12.85	4,146.50

Recapitulation

Timekeeper
Elizabeth Ewens
Nathan A. Metcalf
Michael J. Van Zandt

<u>Hours</u>	<u>Rate</u>
2.10	\$275.00
0.40	125.00
10.35	340.00

<u>Total</u>
\$577.50
50.00
3,519.00

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221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
January 11, 2005
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 12/31/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 01/11/2005

Balance

21381-001 In Re SRBA, Case No. 39576

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San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
January 11, 2005
Our File Number: 21381-001
Invoice Number: 52965

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 12/31/2004

Previous Balance

REDACTED

Services Rendered

		Hours
12/06/2004	EPE Review correspondence from L. Brown re oral argument; draft brief memorandum to M. Van Zandt re same; telephone conference with L. Brown; continue drafting Opening Brief in Support of Challenge.	4.30 1,182.50
12/07/2004	EPE Continue drafting opening brief on challenge.	2.40 660.00
12/08/2004	EPE Continue drafting Opening Brief on Challenge.	5.40 1,485.00
12/09/2004	EPE Draft revisions and additions to Opening Brief on Challenge; communication with M. Van Zandt re same.	5.80 1,595.00
	MVZ Telephone call from Ms. Ewens regarding opening brief; work on brief; edit and sign.	3.15 1,071.00
12/10/2004	EPE Communication with L. Brown re oral argument.	0.10 27.50
	For Current Services Rendered	21.85 6,213.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Elizabeth Ewens	18.70	\$275.00	\$5,142.50
Michael J. Van Zandt	3.15	340.00	1,071.00

JL 0017

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
January 11, 2005
Our File Number: 21381-001
Invoice Number: 52965

Aged Due Amounts

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FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
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Page: 1
December 13, 2004
Our File Number: 21381

**BALANCE INCLUDES CURRENT WORK THROUGH 11/30/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 12/13/2004**

Balance

21381-001 In Re SRBA, Case No. 39576

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Tax ID No: 94-3244361

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c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
December 13, 2004
Our File Number: 21381-001
Invoice Number: 52003

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 11/30/2004

Previous Balance

REDACTED

Services Rendered

		Hours	
11/01/2004	EPE Confer with counsel for the United States regarding motion for extension of time; draft second unopposed motion for extension of time; draft correspondence to local counsel regarding same; telephone conference with R. Ling's office regarding revisions to same; draft letter to court clerk regarding filing.	1.60	440.00
11/04/2004	EPE Review SRBA website regarding ruling on motion for extension of time; draft brief memorandum to S. Strickland and M. Van Zandt regarding same.	0.10	27.50
11/08/2004	EPE Review second revised scheduling order; communication with S. Strickland and M. Van Zandt regarding same.	0.10	27.50
11/24/2004	EPE Continue review of record in preparation for opening brief on challenge.	1.00	275.00
11/29/2004	EPE Work on opening brief; review opinion by presiding Judge Melanson regarding BLM dual based stockwater claims; forward same to M. Van Zandt.	1.80	495.00
11/30/2004	EPE Continue work on opening brief on challenge and review of record relating to same.	1.40	385.00
	For Current Services Rendered	6.00	1,650.00

Recapitulation

<u>Timekeeper</u> Elizabeth Ewens	<u>Hours</u> 6.00	<u>Rate</u> \$275.00	<u>Total</u> \$1,650.00
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JL 0020

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
December 13, 2004
Our File Number: 21381-001
Invoice Number: 52003

Telephone Charges	0.13
Total Expenses Thru 11/30/2004	<u>7.18</u>
Total Current Work	1,657.18

Balance Due

Aged Due Amounts

REDACTED

JL 0021

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c/o Paul Nettleton
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Murphy, ID 83650

Page: 1
November 08, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 10/31/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 11/08/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0022



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Page: 1
November 08, 2004
Our File Number: 21381-001
Invoice Number: 50781

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 10/31/2004

Previous Balance

REDACTED

Services Rendered

		Hours	
10/26/2004	EPE Review SRBA website regarding new decisions that may impact pending litigation; begin preparation of opening brief on challenge.	1.30	357.50
10/29/2004	EPE Telephone conference with M. Van Zandt regarding briefing schedule; telephone call and correspondence with L. Brown regarding same.	0.20	55.00
	For Current Services Rendered	1.50	412.50

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	1.50	\$275.00	\$412.50

Total Current Work

412.50

Balance Due

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Page: 1
October 11, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 09/30/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 10/11/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0024



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Page: 1

October 11, 2004

Our File Number: 21381-001

Invoice Number: 50112

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 09/30/2004

Previous Balance

REDACTED

Services Rendered

			Hours	
09/07/2004	EPE	Review scheduling order regarding challenge; draft brief memorandum to S. Strickland regarding same.	0.10	27.50
09/09/2004	EPE	Telephone conference with M. Van Zandt regarding scheduling order; telephone call to L. Brown regarding same.	0.40	110.00
09/10/2004	EPE	Review research relating to United States waiver of riparian rights with passage of Mining Act of 1866.	0.20	55.00
09/13/2004	EPE	Continue review of cases relevant to Challenge; draft motion for extension of time to file briefs; correspondence with M. Van Zandt and S. Strickland regarding same.	1.60	440.00
09/14/2004	EPE	Make revisions to motion for extension of time.	0.80	220.00
09/27/2004	EPE	Review SRBA website regarding new SRBA decision and status of Court's ruling on motion to extend briefing schedule; draft brief memorandum to S. Strickland and M. Van Zandt regarding same and calendaring new deadlines.	0.20	55.00
09/29/2004	EPE	Calendar deadlines per amended challenge scheduling order; draft status letter to client.	0.70	192.50
For Current Services Rendered			4.00	1,100.00

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	4.00	\$275.00	\$1,100.00

JL 0025

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
October 11, 2004
Our File Number: 21381-001
Invoice Number: 50112

REDACTED

JL 0026

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Page: 1
September 07, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 08/31/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 09/07/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0027



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Page: 1
September 07, 2004
Our File Number: 21381-001
Invoice Number: 49153

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 08/31/2004

REDACTED

Previous Balance

Services Rendered

		Hours	
08/25/2004	EPE Review SRBA website re status of issuance of transcript; call to L. Brown re briefing schedule; draft memo to S. Strickland re same. For Current Services Rendered	0.10 0.10	27.50 27.50

	Hours	Rate
Timekeeper Elizabeth Ewens	0.10	\$275.00

Recapitulation

Total
\$27.50

JL 0028



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Page: 1
August 09, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 07/31/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 08/09/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0029



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In Re SRBA, Case No. 39576

Page: 1
August 09, 2004
Our File Number: 21381-001
Invoice Number: 48325

STATEMENT FOR PERIOD THROUGH 07/31/2004

Previous Balance

REDACTED

Services Rendered

		Hours	
07/22/2004	EPE Review Special Master's Order denying motion to alter or amend; discuss same with M. Van Zandt.	0.40	110.00
07/23/2004	EPE Correspondence with M. Van Zandt re Court's order denying motion to alter or amend; begin outlining response to same through Challenge to the District Court.	1.00	275.00
07/26/2004	EPE Review Administrative Order 1 re requirements for filing Notice of Challenge; review SRBA Subcase Summary Sheet for case to determine what additional transcripts need to be lodged with the court; correspondence with M. Van Zandt and S. Strickland re same; Telephone conference with C. Pridgen re same and trial proceedings.	1.00	275.00
07/28/2004	EPE Telephone conference with B. Coffey re Notice of Challenge; draft memo to S. Strickland re transcript requests.	0.20	55.00
07/30/2004	EPE Draft Notice of Challenge; Telephone conference with M. Van Zandt re same. For Current Services Rendered	<u>1.50</u> 4.10	<u>412.50</u> 1,127.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Elizabeth Ewens	4.10	\$275.00	\$1,127.50

JL 0030

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
August 09, 2004
Our File Number: 21381-001
Invoice Number: 48325

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Page: 1
July 13, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 06/30/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 07/13/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0032



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Page: 1
July 13, 2004
Our File Number: 21381-001
Invoice Number: 47469

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 06/30/2004

Previous Balance

REDACTED

Balance Due

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JL 0033



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Page: 1
June 09, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 05/31/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 06/09/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0034



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In Re SRBA, Case No. 39576

Page: 1
June 09, 2004
Our File Number: 21381-001
Invoice Number: 46516

STATEMENT FOR PERIOD THROUGH 05/31/2004

Previous Balance

REDACTED

Services Rendered

	Hours	
05/17/2004 EPE Review SRBA website re new opinions and review of docket sheet.	0.10	27.50
05/24/2004 EPE Review SRBA website re status of court's ruling on outstanding motions to alter or amend and new SRBA Special Master and Presiding Judge rulings.	0.10	27.50
For Current Services Rendered	0.20	55.00

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	0.20	\$275.00	\$55.00

Total Current Work

55.00

Balance Due

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JL 0035



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Page: 1
May 27, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 04/30/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 05/27/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0036



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In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 04/30/2004

Page: 1
May 27, 2004
Our File Number: 21381-001
Invoice Number: 46363

Previous Balance

REDACTED

Services Rendered

	Hours
04/01/2004 EPE Complete preparation for oral argument; argue motion to alter or amend before special master Dolan; telephone conference with M. Van Zandt regarding same.	4.00 1,100.00
MVZ Prepare for motion to alter or amend; attend hearing; confer with Ms. Ewens.	2.15 731.00
04/19/2004 EPE Draft status letter to client.	1.40 385.00
04/20/2004 EPE Edit letter to P. Nettleton; draft brief memorandum to M. Van Zandt regarding same.	0.30 82.50
MVZ Letter to Paul Nettleton regarding status of case and potential trial.	0.85 289.00
For Current Services Rendered	8.70 2,587.50

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	5.70	\$275.00	\$1,567.50
Michael J. Van Zandt	3.00	340.00	1,020.00



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Page: 1
April 21, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 03/31/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 04/21/2004

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0038



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In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 03/31/2004

Previous Balance

REDACTED

Services Rendered

	Hours	
03/01/2004 EPE Continue work on reply brief; telephone conference with M. Van Zandt regarding same.	1.40	175.00
03/02/2004 EPE Continue drafting brief; telephone calls to P. Seeger and S. Strickland regarding support documents.	0.80	100.00
03/03/2004 EPE Continue drafting Reply Brief; Call to M. Van Zandt re: same.	7.30	912.50
03/04/2004 MVZ Review and edit reply brief.	2.15	688.00
EPE Continue work on Reply Brief in Support of Motion to Alter or Amend; telephone conference with L. Brown and Special Master Dolan re: stipulated continuance for filing Reply Brief to March 9, 2004; draft letter to R. Ling re: his review of Reply Brief.	5.10	637.50
03/07/2004 EPE Make final revisions to Reply Brief.	0.60	75.00
03/08/2004 MVZ Review and edit reply brief.	2.25	720.00
EPE Continue final work on Reply Brief; calls to M. Van Zandt and S. Strickland re: same, exhibits and filing.	2.00	250.00
03/24/2004 MVZ Confer with Ms. Ewens regarding oral argument on motion to alter or amend.	0.75	240.00
03/31/2004 MVZ Prepare for hearing on motion to alter.	0.75	240.00
EPE Prepare for oral argument; discuss same with M. Van Zandt; call clerk re: confirmation of hearing information; call to R. Ling's office re: same. For Current Services Rendered	2.20	275.00
	25.30	4,313.00

Recapitulation

Timekeeper
Elizabeth Ewens

Hours
19.40

Rate
\$125.00

Total
\$2,425.00

JL 0039

Joyce Livestock

Page: 2
April 21, 2004
Our File Number: 21381-001
Invoice Number: 44852

In Re SRBA, Case No. 39576

Timekeeper
Michael J. Van Zandt

<u>Hours</u>	<u>Rate</u>	<u>Total</u>
5.90	320.00	1,888.00

REDACTED

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JL 0040



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Page: 1
February 20, 2004
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 01/31/2004,
PRIOR BALANCES, AND PAYMENTS THROUGH 02/20/2004

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0041



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In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 01/31/2004

Previous Balance

REDACTED

Services Rendered

	Hours
01/02/2004 EPE Continue review of trial record and begin drafting detailed outline of brief in support of motion to alter or amend.	4.00 500.00
01/03/2004 EPE Continue review of record and work on opening brief in support of motion to alter or amend.	1.50 187.50
01/04/2004 EPE Continue drafting opening brief and review of authority in support of same including documents relating to the enactment of the Taylor Grazing Act.	2.90 362.50
01/05/2004 PMS Telephone conference with EPE regarding status of Hage Monitor Valley action and pendency of appeal.	0.30 60.00
EPE Continue drafting opening brief in support of motion to alter or amend; discuss same with M. Van Zandt and C. Pridgen.	5.90 737.50
CAP Telephone call from E. Ewens re issues for brief - motion to alter and amend.	0.40 118.00
01/06/2004 PMS Assist EPE in researching relevant authority applicable to appeal.	0.50 100.00
EPE Continue drafting opening brief in support of motion to alter or amend.	5.10 637.50
01/07/2004 EPE Continue drafting opening brief; discuss same with M. Van Zandt; begin implementing suggestions from M. Van Zandt.	7.80 975.00
01/08/2004 EPE Finalize opening brief in support of motion to alter or amend; discuss same with M. Van Zandt.	6.40 800.00
MVZ Review and revise brief in support of motion to alter or amend; confer with Ms. Ewens.	1.35 432.00

JL 0042

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
February 20, 2004
Our File Number: 21381-001
Invoice Number: 42854

	Hours	
01/09/2004 EPE Discuss filing issues with S. Strickland.	0.10	12.50
01/13/2004 EPE Return call to R. Ling; pull subcase summaries from SRBA website regarding status of filings and pro hac vice application; discussion with M. Van Zandt regarding same.	1.20	150.00
01/30/2004 CAP Telephone call from Larry Brown re our brief - claims we materially altered a quote from ruling by Dolan; telephone call to EDE re same.	0.40	118.00
EPE Telephone conference with C. Pridgen and L. Brown regarding quotes contained in opening brief in support of motion to alter or amend; discuss same with M. Van Zandt.	0.20	25.00
For Current Services Rendered	38.05	5,215.50

	Recapitulation	
	Hours	Rate
Timekeeper		
Elizabeth Ewens	35.10	\$125.00
Craig A. Pridgen	0.80	295.00
Michael J. Van Zandt	1.35	320.00
Peter M. Seeger	0.80	200.00
		160.00

Balance Due

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JL 0043



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BALANCE INCLUDES CURRENT WORK THROUGH 12/31/2003,
PRIOR BALANCES, AND PAYMENTS THROUGH 01/21/2004

21381-001 In Re SRBA, Case No. 39576

Balance

REDACTED

Page: 1
January 21, 2004
Our File Number: 21381

JL 0044



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In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 12/31/2003

Previous Balance

REDACTED

Services Rendered

	Hours
12/01/2003 EPE Telephone call to R. Ling's office to confirm firm information; forward substitution of counsel and pro hac vice pleadings to M. Van Zandt.	0.20 25.00
MVZ Pro hac vice application and substitution of attorneys of Roger Ling; confer with Ms. Ewens.	0.75 240.00
12/02/2003 EPE Telephone conference with S. Strickland regarding substitution of local counsel and application for admission pro hac vice.	0.10 12.50
12/03/2003 EPE Review SRBA website regarding review of new ARBA opinions; review summary sheet for Joyce subcases; draft memorandum to M. Van Zandt and S. Strickland regarding court's order setting briefing schedule and oral argument.	0.40 50.00
12/04/2003 MVZ Substitution of attorneys.	0.45 144.00
12/22/2003 EPE Draft correspondence to R. Ling regarding motion for admission pro hac vice; continue review of record for opening brief on motion to alter or amend special master's report and recommendation.	1.10 137.50
For Current Services Rendered	3.00 609.00

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	1.80	\$125.00	\$225.00
Michael J. Van Zandt	1.20	320.00	384.00

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
January 21, 2004
Our File Number: 21381-001
Invoice Number: 42035

Balance Due

REDACTED

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JL 0046



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Murphy, ID 83650

BALANCE INCLUDES CURRENT WORK THROUGH 11/30/2003,
PRIOR BALANCES, AND PAYMENTS THROUGH 12/09/2003

21381-001 In Re SRBA, Case No. 39576

Balance

REDACTED

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Page: 1
December 09, 2003
Our File Number: 21381

JL 0047



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In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 11/30/2003

Page: 1
December 09, 2003
Our File Number: 21381-001
Invoice Number: 40358

REDACTED

Previous Balance		<u>Services Rendered</u>		Hours
11/05/2003	EPE	Telephone conference with M. Van Zandt, S. Hubley and C. Pridgen regarding substance and status of appeal.		0.10 12.50
11/10/2003	EPE	Review rules regarding the filing of a Motion to Alter or Amend and briefs in support of the same; telephone call to L. Brown regarding possible stipulation regarding briefing schedule; draft brief memorandum to M. Van Zandt regarding briefing schedule and whether to request oral argument on Motion to Alter or Amend.		0.40 50.00
11/14/2003	EPE	Draft correspondence to opposing counsel regarding briefing schedule on Motion to Alter or Amend.		0.20 25.00
11/17/2003	MVZ	Telephone call from Ms. Ewens regarding motion to alter or amend; research on motion.		1.55 496.00
11/19/2003	EPE	Telephone conference with L. Brown regarding briefing schedule; continue work on Motion to Alter or Amend.		1.00 125.00
11/21/2003	EPE	Telephone call to L. Brown.		0.10 12.50
11/23/2003	EPE	Draft notice of substitution of counsel; draft motion to alter or amend special master's report and recommendation; draft motion for admission of counsel pro hac vice; draft declaration of local counsel and affidavit of Elizabeth P. Ewens in support of motion for admission of pro hac vice.		2.00 250.00
11/24/2003	EPE	Discuss motion to alter or amend with M. Van Zandt; draft revisions to same; communication with Richard Harris' office regarding obtaining his review and signature of the motion; draft memorandum to S. Strickland regarding filing instructions.		1.70 212.50
For Current Services Rendered				7.05 1,183.50

JL 0048

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
December 09, 2003
Our File Number: 21381-001
Invoice Number: 40358

	Recapitulation		
Timekeeper	Hours	Rate	Total
Elizabeth Ewens	5.50	\$125.00	\$687.50
Michael J. Van Zandt	1.55	320.00	496.00

Balance Due

REDACTED

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JL 0049



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221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
November 10, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 10/31/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 11/10/03

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0050



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BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
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In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 10/31/03

REDACTED

Page: 1
November 10, 2003
Our File Number: 21381-001
Invoice Number: 39488

Previous Balance

Services Rendered

	Hours	
10/07/03 MVZ review decision from Special Master Dolan; conference with Mr. Pridgen.	1.15	368.00
CAP Initial review of ruling by Dolan, related conferences with MVZ; telephone call to Paul Neddleton re same; send copy of ruling; letter telephone call from Lewis Brown re same even he was surprised re Joyce waters right -total time 3.4 hours.	2.40	708.00
EPE begin review of special Master ruling; telephone conference with C. Pridgen regarding same.	0.30	37.50
10/08/03 MVZ Review opinion; meeting with Ms. Ewens and Mr. Pridgen; develop strategy.	2.25	720.00
CAP Telephone call from Larry Brown re appeal, notice of motion to alter or amend; meeting with MVZ and EPE re decision and appeal; review specific portions of Dolan ruling specifically to identify issues - Dolan focused on and specific exhibits and testimony to assist EO15, Review trial binders, exhibits, transcripts and related conferences with EOE all re assisting her with developing record for motion to alter or amend, to Leroy Brown - he will oppose consideration of case with L.U. appeal, total time 2.7 hours.	2.70	796.50
EPE Complete review of Special Master ruling; discuss response to same with M. Van Zandt and C. Pridgen; telephone conference with L. Brown regarding United States' position on briefing schedule; begin evaluation of record.	3.50	437.50
10/10/03 LLP Conference C. Pridgen re exhibits admitted at trial; review same to be scanned and put on a CD for the Appeal.	4.50	652.50
EPE Communication with C. Pridgen regarding summary judgment orders in Joyce as they relate to the Special Master's Report and Recommendation; communication with L. Paffhausen regarding finalizing exhibits and organizing record at issue in the case.	0.40	50.00
CAP Conferences with Laurie P. re exhibits from trial - items to be copied also key problems of testimony...	0.60	177.00
10/13/03 MVZ Telephone call to Ms. Ewens; research on stock watering issue.	1.15	368.00

JL 0051

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
November 10, 2003
Our File Number: 21381-001
Invoice Number: 39488

	Hours	
EPE Conference with office regarding compilation of record on review of Special Master's Report and Recommendation.	0.50	62.50
10/14/03 MVZ Research on Taylor Grazing Act.	2.55	816.00
CAP Letter and telephone call from Larry Brown re potential settlement of litigation; similar terms to Samenko's settlement and his arguments to support merits of same.	0.50	147.50
10/15/03 EPE Telephone conference with C. Pridgen regarding United States' verbal communication of settlement offer.	0.30	37.50
10/20/03 CAP Telephone call from L. Brown re his settlement offer; asked him to forward final version of Samanko settlement.	0.20	59.00
EPE Review rules regarding motion to alter or amend; pull case summary sheet and docket sheet relevant to same.	0.30	37.50
10/21/03 CAP Memo - MVZ and EPE re Brown settlement offer; review of prior settlement.	0.40	118.00
10/22/03 EPE Review memorandum from C. Pridgen regarding settlement offer communicated by the United States; telephone conference with C. Pridgen regarding same.	0.20	25.00
10/25/03 EPE Continue review of pretrial documents including summary judgment order setting forth Special Master's requirements for proof at trial.	0.80	100.00
10/27/03 EPE Begin review of trial transcripts.	0.90	112.50
10/28/03 EPE Continue review of record and hearing transcript.	0.30	37.50
10/29/03 EPE Telephone conference with L. Brown regarding possibility of settlement; continue review of hearing transcript; telephone conference with M. Van Zandt regarding settlement discussions and record.	0.50	62.50
10/31/03 EPE Review SRBA website postings regarding status of claims and status of October docket sheet; review new SRBA decision issued by Special Master Dolan on the issue of BLM stockwater rights; conference with M. Van Zandt regarding same.	0.60	75.00
For Current Services Rendered	27.00	6,005.50

Recapitulation		Total
Timekeeper	Hours	Rate
Elizabeth Ewens	8.60	\$125.00
Craig A. Pridgen	6.80	295.00
Michael J. Van Zandt	7.10	320.00
Laurie L. Paffhausen	4.50	145.00
		\$1,075.00
		2,006.00
		2,272.00
		652.50

JL 0052

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
November 10, 2003
Our File Number: 21381-001
Invoice Number: 39488

Balance Due

REDACTED

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

JL 0053



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
October 07, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 09/30/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 10/07/03

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0054



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
October 07, 2003
Our File Number: 21381-001
Invoice Number: 38419

STATEMENT FOR PERIOD THROUGH 09/30/03

Previous Balance

Balance Due

REDACTED

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

JL 0055



221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
September 15, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 08/31/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 09/15/03

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0056



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL 415/905-0200
FAX 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
September 15, 2003
Our File Number: 21381-001
Invoice Number: 37812

STATEMENT FOR PERIOD THROUGH 08/31/03

Previous Balance

Balance Due

REDACTED

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

JL 0057



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
August 28, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 07/31/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 08/28/03

21381-001 In Re SRBA, Case No. 39576

Balance

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JL 0058



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
August 28, 2003
Our File Number: 21381-001
Invoice Number: 37204

STATEMENT FOR PERIOD THROUGH 07/31/03

Previous Balance

Balance Due

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We appreciate your prompt response. Please call if you have
any questions regarding this statement.

JL 0059



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BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
July 08, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 06/30/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 07/08/03

21381-001 In Re SRBA, Case No. 39576

Balance

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JL 0060



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL 415/905-0200
FAX 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
July 08, 2003
Our File Number: 21381-001
Invoice Number: 35828

STATEMENT FOR PERIOD THROUGH 06/30/03

Previous Balance

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Balance Due

We appreciate your prompt response. Please call if you have
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JL 0061



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BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

BALANCE INCLUDES CURRENT WORK THROUGH 05/31/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 06/10/03

Page: 1
June 10, 2003
Our File Number: 21381

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0062



221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL 415/905-0200
FAX 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
June 10, 2003
Our File Number: 21381-001
Invoice Number: 34721

STATEMENT FOR PERIOD THROUGH 05/31/03

Previous Balance

Balance Due

REDACTED

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any questions regarding this statement.

JL 0063



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL-415/905-0200
FAX-415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
May 09, 2003
our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 04/30/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 05/09/03

21381-001 In Re SRBA, Case No. 39576

Balance

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JL 0064



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL-415/905-0200
FAX-415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
May 09, 2003
Our File Number: 21381-001
Invoice Number: 33847

STATEMENT FOR PERIOD THROUGH 04/30/03

Previous Balance

REDACTED

Services Rendered

04/01/03 CAP Review Larry Brown's brief - last two pages - he alleges two people cannot use same water thus we must be junior; telephone conference with EPE re our brief and conflicting position of U.S. for meeting in D.C.

Hours

0.40	118.00
0.40	118.00

For Current Services Rendered

Timekeeper
Craig A. Pridgen

Recapitulation
Hours
0.40

Rate
\$295.00

Total
\$118.00

Balance Due

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JL 0065



MCQUAID
BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
Our File Number: April 11, 2003
21381

BALANCE INCLUDES CURRENT WORK THROUGH 03/31/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 04/11/03

21381-001 In Re SRBA, Case No. 39576

Balance

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JL 0066



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BEDFORD &
VAN ZANDT LLP

221 Main Street 16th Floor
San Francisco CA 94105-1936
TEL: 415/905-0200
FAX: 415/905-0202
Tax ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 03/31/03

Page: 1
April 11, 2003
Our File Number: 21381-001
Invoice Number: 32787

Previous Balance

REDACTED

Services Rendered

Hours

03/10/03 CAP Continue review and outline of trial transcripts for closing brief; review Appendix #1 to U.S. opposition brief to our motion for summary judgment re deeds - chain of title issues raised at trial by Brown - need exhibits - Shea # 91 and 92 - conference with Laurie re exhibits - total 5.3 hours.

5.00 1,475.00

03/11/03 CAP Telephone conferences with Brown re briefing schedule and legal description issues, conference telephone call with Special Master Dolan and Brown re briefing schedule continuance; review Boltz testimony, finish Kay also review Price testimony; two conferences with Laurie re deeds, patents and water rights charts - as exhibits for brief - total 3.2 hours.

2.90 855.50

LLP Review US trial exhibit 1 and attachments to Brown declaration filed in opposition to Joyce Livestock's motion for summary judgment; begin revisions to the exhibit to reflect transfer of water rights; conference with C. Pridgen re: same.

3.00 435.00

03/12/03 CAP Finish review of trial transcripts trial days Thursday afternoon and Friday - mainly our witnesses - outline Paul's testimony for Closing Brief; conference with EPE re limited research on specific issues; begin outline of brief and list of exhibits.

4.00 1,180.00

LLP Revisions to US exhibit.

7.00 1,015.00

03/13/03 CAP Long telephone conference with Larry Brown re issues on mapping raised by Fred Price during trial and claim we need 'lot' descriptions not quarter sections to prove POU citing Dolan's ruling on summary judgment. Fred will give us his final analysis of POU and Larry will stipulate to amend claim; begin review of mapping issues and related exhibits - continue review cases of Larry in response to our motion for summary judgment which he continues to rely on; telephone conference with EPE re limited research of related cases; telephone conference with Fred Price - left message re legal descriptions - total time 1.9 hours.

1.50 442.50

EPE Telephone conference with C. Pridgen re post-trial brief; forward research and memorandum to C. Pridgen relevant to brief; continue work on letter to T. Sansonetti, Assistant Attorney General for Environmental and Natural Resources Division regarding adverse impact of United States

JL 0067

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
April 11, 2003
Our File Number: 21381-001
Invoice Number: 32787

	Hours	
Litigation stance in the SRBA.	0.80	100.00
LLP Revisions to US exhibit.	6.30	913.50
03/14/03 CAP Continue dictation of Closing Brief - re U.S. claims - review prior decisions in SRBA - Begin revision of portion on U.S. claims, related review of transcripts of trial for citations to testimony of Madenford and Boltz, conference with Laurie re Exhibit A - revised chain of title indicating reference to water rights or appurtenances, total time - 6.3 hours.	6.00	1,770.00
EPE Telephone conference with N. Hansen, assistant to T. Sansonetti; continue drafting correspondence and compiling information to be presented in advance of meeting with T. Sansonetti; telephone conference with C. Pridgen re same.	0.60	75.00
LLP Continue revisions to US exhibits; prepare exhibit re: base ranch patents.	7.00	1,015.00
03/16/03 CAP Continue dictation of Closing Brief - involving Joyce claims - related review of cases, prior briefs, Wood decision, Hurlbutt decision, Cushman ruling and transcripts of Paul, Lewis and Gibson for specific citations - total 3.4 hours.	3.00	885.00
03/17/03 CAP Review - revise Exhibit A prepared by Laurie, finish dictation of Closing Brief re Joyce claims - telephone conference with EPE re her revisions to portion on U.S. claim - review her comments, revise brief - total time - 8.5 hours.	7.80	2,301.00
EPE Review post trial brief; telephone conference with C. Pridgen re same; draft select revisions to post trial brief; continue drafting letter to T. Sansonetti.	1.60	200.00
03/18/03 CAP Finish dictation and review and revise Brief and Attachment 'A' - summary of chain of title setting forth appurtenancy or water right language, prepare motion to amend legal descriptions in Silver City and Jordan Creek to deal with 'lots' and mining claims pursuant to Price testimony - review same and Exhibit - final review of all of above.	6.30	1,858.50
SXR Review and review Joyce Livestock brief for CAP.	1.10	159.50
03/19/03 EPE Continue drafting letter to T. Sansonetti; draft brief memorandum to M. Van Zandt and C. Pridgen re same; telephone conference with C. Pridgen re presentation of information to T. Sansonetti.	0.70	87.50
03/25/03 CAP Review closing brief from Larry Brown and specifically attach on Joyce historic rights and title issues - also argument re U.S. appropriation - relies exclusively on cases involving permits and/or land management issues.	0.60	177.00
03/26/03 EPE Review Post Trial Brief filed by United States; begin drafting memorandum to C. Pridgen and M. Van Zandt re same.	1.10	137.50
03/27/03 EPE Review post trial brief filed by United States.	0.40	50.00
MVZ Review and revise final letter to Mr. Sansonetti on cases		

JL 0068

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
April 11, 2003
Our File Number: 21381-001
Invoice Number: 32787

under his management; confer with Ms. Ewens; approve letters and send.

	Hours
	0.45 144.00
For Current Services Rendered	67.15 15,276.50

	Recapitulation	
	Hours	Rate
Timekeeper		Total
Elizabeth Ewens	5.20	\$650.00
Craig A. Pridgen	37.10	10,944.50
Michael J. Van Zandt	0.45	144.00
Samantha L. Hubley	1.10	159.50
Laurie L. Paffhausen	23.30	3,378.50

Balance Due

REDACTED

We appreciate your prompt response. Please call if you have any questions regarding this statement.

JL 0069

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
March 25, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 02/28/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 03/25/03

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0070

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
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In Re SRBA, Case No. 39576

Page: 1
March 25, 2003
Our File Number: 21381-001
Invoice Number: 31677

STATEMENT FOR PERIOD THROUGH 02/28/03

REDACTED

Previous Balance

Services Rendered

	Hours
02/03/03 CAP Review memos from Laurie re summary of trial exhibits, conference with Laurie re binders needed also re maps, continue review of transcripts - outline argument for closing brief.	1.80 531.00
02/06/03 LLP Conference with C. Pridgen re: introduction of evidence not admitted at trial; review same; review of our exhibits.	5.00 725.00
CAP Telephone conference with Larry Brown re exhibits he is using for brief - 17 and 18.	0.20 59.00
02/11/03 CAP Continue review trial transcripts - Mallis testimony, begin Price testimony, related review of exhibits.	1.50 442.50
02/12/03 CAP Continue review transcripts - Price testimony - over one day - and issues re descriptions in Joyce claims; telephone conference with Brown.	1.30 383.50
02/17/03 CAP Continue review Price testimony and exhibit review - continue outlining closing brief.	1.40 413.00
02/19/03 CAP Letter to Dolan re extension of time for brief pursuant to conference telephone call with Larry and Dolan.	0.40 118.00
02/24/03 MVZ Confer with Ms. Bonini on meeting with Sansonetti.	0.35 112.00
For Current Services Rendered	11.95 2,784.00

	Hours	Rate	Total
Recapitulation	6.60	\$295.00	\$1,947.00

Timekeeper
Craig A. Pridgen

JL 0071

Joyce Livestock

Page: 2
March 25, 2003
Our File Number: 21381-001
Invoice Number: 31677

In Re SRBA, Case No. 39576

Michael J. Van Zandt
Laurie L. Paffhausen

0.35	320.00	112.00
5.00	145.00	725.00

Balance Due

REDACTED

JL 0072

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MCCLAJID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
February 14, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 01/31/03,
PRIOR BALANCES, AND PAYMENTS THROUGH 02/14/03

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0073

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
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In Re SRBA, Case No. 39576

Page: 1
February 14, 2003
Our File Number: 21381-001
Invoice Number: 30657

STATEMENT FOR PERIOD THROUGH 01/31/03

Previous Balance

REDACTED

Services Rendered

	Hours
01/13/03 CAP Long telephone conference with Larry Brown - reporter should have transcripts next week - thinks briefs should be filed by February 15 subject to getting transcripts and Dolan.	0.30 88.50
01/21/03 CAP Two conferences with Laurie re preparation of trial exhibit binders - review of trial transcript and related summary.	0.50 147.50
LLP Review trial transcripts re: exhibits admitted to trial, under which witness and date of testimony.	4.00 580.00
01/23/03 CAP Begin review of trial transcript - Roxanne Brown testimony as part of preparation of closing argument re U.S. ability to appropriate stockwater without ownership of cattle and argument re presumption that Director's Report is prima facie evidence of a water right.	1.20 354.00
01/24/03 CAP Begin review and outline transcript of trial for closing brief, telephone call with Brown re same and anticipated completion of remaining volumes of transcript, conference with Lauri re review of transcripts and admitted exhibits -- all -- but only list and prepare binders for those specifically used in trial.	2.30 678.50
01/27/03 LLP Continue review of trial transcripts re: exhibits admitted at trial.	1.00 145.00

01/28/03 CAP Telephone call with Brown re schedule of closing brief, problems with transcripts -- he wants to supplement testimony to correct portion which could not be transcribed, conference telephone call with

JL 0074

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
February 14, 2003
Our File Number: 21381-001
Invoice Number: 30657

	Hours
Special Master Dolan re briefing schedule and transcript issue.	0.60 177.00
LLP Continue review of trial transcripts for exhibits admitted to trial.	5.75 833.75
01/29/03 CAP Continue review of trial transcripts with emphasis on (1) testimony supporting our rights and fact U.S.-BIM has not acquired stockwater right under any theory; (2) identify portions of testimony which needs to be supplemented because it was 'unintelligible.'	1.80 531.00
01/30/03 CAP Conferences with Laurie re status of transcript review and exhibits; continue review of transcripts.	1.00 295.00
LLP Continue review of trial transcripts for exhibits admitted at trial.	0.50 72.50
01/31/03 CAP Continue review of trial transcripts keeping in mind Larry Brown has asked Dolan to allow witness to supplement.	1.80 531.00
LLP Prepare lists of US and Joyce Livestock exhibits admitted at trial; begin review of documents generated at or/for trial.	2.30 333.50
For Current Services Rendered	23.05 4,767.25

Recapitulation	
Timekeeper	Hours
Craig A. Pridgen	9.50
Laurie L. Paffhausen	13.55
	<u>Rate</u>
	\$295.00
	145.00
	<u>Total</u>
	\$2,802.50
	1,964.75

JL 0075

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
February 14, 2003
Our File Number: 21381-001
Invoice Number: 30657

Balance Due

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JL 0076

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221 MAIN STREET, SIXTENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
January 10, 2003
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 12/31/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 01/10/03

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0077

MCQUAID, METZLER, BEDFORD & VAN ZANDT, LLP
221 MAIN STREET, SIXTENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
January 10, 2003
Our File Number: 21381-001
Invoice Number: 29589

STATEMENT FOR PERIOD THROUGH 12/31/02

Previous Balance

REDACTED

Services Rendered

Hours

12/01/02 CAP Meeting with Larry Brown re trial issues: his proposed motion for judgment based upon IDWR Report, witnesses for trial, stipulations re exhibits and order of witnesses; begin preparation for trial, review U.S. exhibits, deposition of Madenford; review Larry's trial brief - fax to office re cases I need cited in brief and Attorney General opinion, prepare for meeting with Paul, Gibson and Lewis - review documents from Gibson; prepare for examination of witnesses - Madenford and Gibson re Larry's motion for judgment based on presumption - total time including travel 12 hours - travel = 1.6 hours.

9.00 2,565.00

12/02/02 ALF Confer with MAS re: fax from CAP and coordinate information retrieval with WC, follow up and message to CAP.

0.70 129.50

CAP Meeting with Paul, Chad Gibson, Gene Lewis in Murphy - prepare their testimony, key issues and order of trial; review maps and exhibits; preparation for trial, review cases faxed by Willis; prepare for cross-examination of Roxanne Brown concerning presumption argument by Brown; prepare for direct examination of witnesses Mallis and Price - review exhibits from U.S. depositions - total time 14.5 hours including travel to Murphy, Idaho.

13.50 3,847.50

CAP Unbilled time, telephone conferences with office re documents and cases, billing - November.

1.20 342.00

WCC Telephone calls x 3 to attorney Pridgen for instruction. Review and organize exhibits needed

JL 0078

Joyce Livestock

Page: 2
January 10, 2003
Our File Number: 21381-001
Invoice Number: 29589

In Re SRBA, Case No. 39576

	Hours
for trial per attorney Pridgen. Retrieve cases cited in opposing counsel's brief using Westlaw Internet database. Forward all documents to attorney Pridgen in Boise, Idaho. Send copy of F. Price deposition via federal express for priority next day delivery.	4.30 537.50
12/03/02 ALF Message from CAP re: exhibits for trial, and forward to WC; follow up with WC and with staff re: coverage to back up CAP in trial.	0.20 37.00

CAP First day of trial: morning preparation, trial 8:30 am to 5:00 pm including lunch meeting with clients, evening preparation for trial, review documents and deposition of Price sent by Willis for Price testimony; begin preparation for testimony and cross-examination of Price, Kay and Boltz - total 16 hours.

14.40 4,104.00	
WCC Research case files for documents requested by attorney Pridgen needed for trial.	2.20 275.00
12/04/02 ALF Confer with CAP re: materials needed for trial and coordinate same.	0.30 55.50

CAP Second day of trial: morning preparation for testimony of Lewis - out of order; trial 8:30 am - 12:00 pm, 1:00 pm - 5:00 pm; afternoon preparation for trial including cross-examination of Madenford after his direct testimony and Kay and Boltz cross-examination including depositions and based upon Madenford's testimony, begin preparation for Gibson direct examination; review all deeds in chain of title for Gibson and Paul's testimony and cross-examination of U.S. witnesses particularly finishing Price - total 15.8 hours.

14.50 4,132.50	
12/05/02 ALF Locate materials for CAP in trial and coordinate forwarding, legal research re: abandonment, forfeiture, and resumption, confer with MVZ and memo to CAP.	1.70 314.50

CAP Third day of trial: morning finish preparation for Gibson testimony - trial - finish cross-examination of Price, Boltz and Kay; direct examination of Chad Gibson; afternoon preparation for completing Gibson and direct examination of Paul - review Dolan's summary judgment order to cover all issues and questions he raised - review related deeds,

JL 0079

Joyce Livestock

Page: 3
January 10, 2003
Our File Number: 21381-001
Invoice Number: 29589

In Re SRBA, Case No. 39576

	Hours
applications under Taylor Grazing Act - total 13.5 hours.	12.00 3,420.00
12/06/02 CAP Morning: finish preparation for testimony of Paul; finish trial - Gibson and Paul; introduce additional exhibits and motions to amend according to proof re priority dates and places of use 6.4 hours.	5.00 1,425.00
12/07/02 CAP Outline CAP notes from trial, and key points for closing brief in lieu of closing argument, travel - total 12.8 hours.	1.00 285.00
12/09/02 ALF Confer with CAP re: conduct of trial and issues to follow up in post-trial briefing.	0.80 148.00
CAP Outline CAP trial notes and outline issues for closing brief based upon testimony and exhibits - list issues raised by U.S. - also issues raised but which Larry did not establish pursuant to testimony for example his cost of production argument - permit fees tied to cost of raising cattle.	1.60 456.00
EPE Telephone conference with C. Pridgen re trial and post trial briefing.	0.50 62.50
For Current Services Rendered	82.90 22,136.50

	Hours	Rate	Total
Timekeeper			
Elizabeth Ewens	0.50	\$125.00	\$62.50
Anthony L. Francois	3.70	185.00	684.50
Craig A. Pridgen	72.20	285.00	20,577.00
Willis C. Conner	6.50	125.00	812.50

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In Re SPBA, Case No. 39576

Page: 4
January 10, 2003
Our File Number: 21381-001
Invoice Number: 29589

Balance Due

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JL 0081

We appreciate your prompt response. Please call if you have any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
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TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
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Murphy, ID 83650

Page: 1
December 12, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 11/30/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 12/12/02

Balance

21381-001 In Re SRBA, Case No. 39576

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JL 0082

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
December 12, 2002
Our File Number: 21381-001
Invoice Number: 28536

STATEMENT FOR PERIOD THROUGH 11/30/02

Previous Balance

REDACTED

Services Rendered

Hours

11/01/02 CAP Finish preparation for Gibson deposition; meeting with Gibson and Paul to prepare for deposition, conference with Larry and Paul re possible settlement - Larry brought agreement and to have Paul call Meyer in D.C. who approved Brackett settlement - total time including travel 10.8 hours.

7.80 2,223.00

11/04/02 ALF Confer with CAP re: exhibit selection and objections to US exhibits.

0.60 111.00

CAP Begin review of discovery documents -- 9 volumes for trial exhibits, related conference with Tony F. re same and supplementing our proposed exhibits for trial, review prior memos of EPE re BLM arguments re beneficial use for motions in limine -- review US responses to discovery and requests for admissions also re preparation of our supplemental response to US discovery including review of 1936 minutes of regional meetings in Salt Lake to implement IGA -- also review documents from John T. Shea grazing operator file -- also outline of additional items which Gibson should review for testifying such as issues re grazing in common and carrying capacity -- tc with Larry Brown re discovery, exhibit

3.40 969.00

11/05/02 ALF Legal research re: US legal theories.

0.30 55.50

CAP Review Morros decision -- relied on by Brown, review prior pleadings on basin 57 case; conference with Tony x 2 re exhibits -- trial, conference with MVZ re settlement, tc Brown.

1.30 370.50

JL 0083

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Page: 2
December 12, 2002
Our File Number: 21381-001
Invoice Number: 28536

In Re SRBA, Case No. 39576

	Hours
11/06/02 ALF Review designated exhibits and prepare exhibit and witness list, confer with CAP and with DOJ counsel.	1.40 259.00
CAP Long telephone conference with Chad Gibson re supplemental documents to his deposition - review fax of same; telephone conference with Larry Brown re same and extension to submit list of exhibits and witness lists - Larry wants letter rejecting settlement offers - will give me McGowan's DC number on Monday; two conferences with Tony re additional exhibits to be designated - patents, title summary and charts - maps.	
11/08/02 CAP Tc Robin, Dolan's clerk, re pretrial conference -- originally required personal appearance - also Harris not available. Begin research re motions in limine to include documents/witnesses. Begin review of documents -- US proposed exhibits and research re motion to bifurcate trial -- US to go first, conference with Tony re supplementing exhibits for trial and need for Neddleton family claim of title and TGA applications -- Hubert Nettleton.	3.50 997.50
11/11/02 ALF Complete witness and exhibit list and selection of exhibits, confer with CAP re: same.	4.10 758.50
CAP Three conferences with Tony re exhibits for trial, review same, revise re adding patents for Nettleton family 1925, revise exhibit and witness list, review witness/exhibit list from BLM - Larry Brown re our exhibits, conference with Tony re map overlays; begin research and outline for motion in limine, review BLM discovery responses.	
11/12/02 ALF Confer with CAP re: motions in limine.	3.40 969.00
	0.10 18.50

CAP Two telephone conferences with Larry Brown re exchange of witness lists and exhibit list not received, also re bifurcating trial - U.S. to go first also re subpoena of witnesses of BLM to trial - Mr. Kay is in Arizona, conference with Tony re above and re supplements to our exhibit list; conference telephone call with Brown and Dolan re hearing on 11/21/02 - will be by phone and hearing on motions in limine; finish review of all exhibits designated by BLM for Motion in Limine; finish research Idaho Code sections, Evidence Code and Civil Code of Procedure; review prior rulings -

JL 0084

Joyce Livestock

Page: 3
December 12, 2002
Our File Number: 21381-001
Invoice Number: 28536

In Re SRBA, Case No. 39576

	Hours	
SRBA re issues involving BLM stockwater rights - appropriation as a result of management under (cont'd on p. 2)	5.99	1,707.15
CAP (cont'd from p. 1) Taylor Grazing Act and Nevada cases including Hage; prepare draft of Motion, related conference with Tony; telephone conference with EPE re her related memo - total time 6.8 hours.	0.01	2.85
11/13/02 EPE Review Motions in Limine; perform additional research on legal issues relating to same; telephone conferences with C. Pridgen re response to United States' legal theories concerning stockwater ownership and issue of effect, as precedent, of earlier decisions issued in the SRBA relating to beneficial use stockwater rights on public land.	2.60	325.00
ALF Confer with CAP re: analysis of FRH and internal memoranda for motions in limine.	0.30	55.50
CAP Four telephone conferences with Larry Brown re additions to his exhibit list, his proposed motion and basis of same, his theories that rulings by Judge Hurlbutt are dicta and his telephone conference with Dolan to extend filing date to Friday and fact Dolan wants exhibit binders from both sides by Tuesday; two telephone conferences with EPE re her revisions to Motion in Limine; review additional 1997 SRBA Rulings and cases cited in 1998 Orders also Idaho Constitution Article XV and cases re Code Sections 42-101, 42-103, 42-104, 42-114; revise motion; prepare exhibit binder of U.S. exhibits subject to our Motion; review exhibits; related conference with Tony re same (cont'd on p. 2)	6.99	1,992.15
CAP (cont'd from p. 1) telephone conference with Harris re execution of same - total time - 7.5 hours.	0.01	2.85
11/14/02 EPE Telephone conference with C. Pridgen re issue of definition of dicta and precedential weight to be given to dicta (relevant to pending Motions in Limine); conduct research relating to same.	0.60	75.00
ALF Confer with CAP and MVZ re: use of Hage decisions.	0.10	18.50

CAP Telephone call from Paul re settlement proposal and

JL 0085

Joyce Livestock

Page: 4
December 12, 2002
Our File Number: 21381-001
Invoice Number: 28536

In Re SRBA, Case No. 39576

Hours

trial preparation - also preparation of witnesses on December 2nd; long telephone call from Brown re motions in limine exhibits and proposed counter-offer re settlement and Judge wants exhibits by next week - trial binders and all exhibits re motions in limine; begin preparation re same and notice of same to Court including basis for admissibility of exhibits supporting motions - revise Notice, pleadings and finish binders re motions; telephone conference with Harris - total 3.4 hours.

2.90 826.50

11/15/02 ALF Confer with CAP re: US exhibits and motion in limine.

0.20 37.00

CAP 2 to's with Brown, one long (1.4) re Joyce exhibits, what we will include in trial briefs, also re bifurcation of trial -- also Larry may file additional motions with trial brief re evidence and witnesses, also re revisions and signing Gibson depo -- Larry will try to exclude Gibson as witness -- CAP review patent files -- predecessors to Neddleton and Shew; initial review of Gibson depo, review Tuthill affidavit -- 706 -- expert report -- to Brown re same -- used on prior case -- Tuthill not expert here -- he will not withdraw -- review Larry's motions in limine -- will file response to Larry's motions and reply to Larry's likely response to our motions (continued in next entry)

3.00 855.00

CAP (continued) Finish preparation of notice to court re exhibits for motions in limine, begin research re Rule 706 -- court appointed report, all re reply brief (total 4.2 hours).

0.80 228.00

11/16/02 CAP Continue preparation of exhibits - trial binders - identify exhibits, conferences with Jover and Carol Stone re preparation of binders, indexing and covers; telephone conference with Tony re exhibits not pulled - location; begin preparation of Response to U.S. - Larry Brown's motions in limine to exclude exhibits; related research of authority cited by Brown - total time - 4.6 hours.

4.00 1,140.00

PLC Preparation of trial binders.

4.00 120.00

11/17/02 CAP Conference with Nick and Jover and assist in preparation of trial - exhibit binders; finish dictation of responses to U.S. motions in limine

JL 0086

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 5
December 12, 2002
Our File Number: 21381-001
Invoice Number: 28536

	Hours
and reply to U.S. response to Joyce motions in limine as represented orally by Larry Brown by phone on 11/15/02; revise same, related research of points and authorities - total time 7.2 hours.	6.40 1,824.00
11/18/02 ALF Confer with CAP re: exhibits for trial, and with staff re: completion of binders for court.	0.20 37.00

CAP TC Chad Gibson re his deposition transcript and potential revisions and issues for him to review for trial -- I will review and call Wednesday; review and revise response to US motions in limine and reply to anticipated arguments by Brown in response to our motions in limine based upon tcs with Larry Brown -- limited additional research -- final proofreading, dictation re service -- dictation re exhibits -- no charge (total 2.9 hours).

2.90 826.50

11/19/02 CAP Numerous tc's with Paul Nettleton re his tc to attorney Matt McCowan -- U.S. solicitor re settlement and setting up conference tc; review CAP notes re Gibson deposition testimony including changes -- also noted matters he must clarify and matters he needs to avoid giving legal opinions on.

1.50 427.50

11/20/02 SXR Research Interior Board Land Decision on WestLaw. Print decision for MVZ and CAP.

0.10 12.50

11/21/02 ALF Confer with CAP re: motions in limine and preparation for trial.

0.20 37.00

CAP Preparation for oral argument on motions in limine and pre-trial conference -- including review Brown's response and cases cited -- Larry misquotes 1998 special master ruling and Judge Burdick's ruling -- under IC section 402 none of evidence supports the probability that BIM actually appropriated a water right; tc with Brown re above and basis for his theories -- citations he confuses present water appropriation and claims deal stockwater rights from same cattle -- review prior declarations of IDWR re lack of budget to investigate stockwater appropriations -- also Brown does not think we can prove privy date water right forfeited when Shea 'sold out' in 1938 - (continued in next entry)

5.00 1,425.00

CAP (continued) review file re same -- this was a

JL 0087

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In Re SRBA, Case No. 39576

Page: 6
December 12, 2002
Our File Number: 21381-001
Invoice Number: 28536

Hours

lease, also thinks a gap and forfeiture when Peduccini picked up his place at tax sale -- check Peduccini fate since Larry thinks this is only base property where preference was given mentioning Jordan Creek; begin outline of statement of facts for trial brief; review cases cited by Brown on brief; attend hearing -- pretrial conference and motions in limine via phone with Dolan -- hearing 1.4 hours -- Dolan excluded expert report from basin 57 cases.

0.80 228.00

SXR Get cases from west law, cite check the same.

0.20 25.00

WCC Review and organize exhibit documents for upcoming trial.

1.20 150.00

11/22/02 ALF Confer with CAP re: US arguments related to Salove lease.

0.50 92.50

CAP 2 tc's with Gibson re deposition corrections, items for him to review for trial and reviewed type of testimony which will not involve legal opinion; 2 tc's with Larry Brown re trial briefs, witness Kay not available Tuesday; review Boltz testimony and affidavit, prepare subpenas duces tecum for trial -- all witnesses, preparation for trial, trial binders, begin review of files -- documents for pretrial brief, review Woods decision; tc's Paul re discussions with Mat McCowen re statement, tc Brown re same, tc from Brown re stipulations of facts for trial, total 6.3 hours including conference with staff re trial preparation.

5.70 1,624.50

WCC Conference with C.Pridgen regarding case assignment. Review case exhibits and organize exhibit binders in preparation for trial.

5.30 662.50

11/24/02 CAP Outline trial brief -- review prior decisions -- Wood, US v. Morris cited by Brown; review US chain of title, review witness depositions and affidavits -- need Jaloo lease as exhibit, US summoning chain of title -- check Shea -- IGA application and chain of title from prior owners -- total 4.2 hours.

4.00 1,140.00

11/25/02 ALF Confer with CAP re: US theories in upcoming trial.

0.20 37.00

CAP Finish research, prior arguments and cases in US BLM motion for summary judgment re argument that it owns water rights, 4 tc's Brown re stipulation on

JL 0088

Joyce Livestock

Page: 7
December 12, 2002
Our File Number: 21381-001
Invoice Number: 28536

In Re SRBA, Case No. 39576

Hours

undisputed facts, potential settlement, stipulation re exhibits, conference tc with Dolan to extend filing date to Wednesday and re order of trial, begin dictation of trial brief, total 6.5 hours.

6.20 1,767.00

WCC Telephone call to L. Brown of U.S. Attorney's office regarding missing exhibits. Conference with C. Pridgen regarding same. Update and complete trial binders with exhibits faxed from L. Brown's office.

1.20 150.00

11/26/02 ALF Confer with CAP.

0.20 37.00

CAP Dictation re preparation of trial and exhibit binders; tc's from Brown re his authority supporting US appropriation of water right and fact state did not contest it and stipulated to it; finish dictation of trial brief -- review Wood decision re these issues -- revise brief in PM; tc Paul re meeting on Monday in Murphy with Gibson and Lewis -- total 6.5 hours.

6.00 1,710.00

11/27/02 CAP Final review and revise trial brief; preparation of trial binders, exhibit binders, case/opinions/research/sources binders, discovery binder -- relating dictation, 2 tc's from Brown re revisions to proposed settlement language -- call Bob, revise and re stipulation on evidence to be admitted.

3.70 1,054.50

For Current Services Rendered

110.30 27,783.50

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	3.20	\$125.00	\$400.00
Anthony L. Francois	8.40	185.00	1,554.00
Craig A. Pridgen	86.70	285.00	24,709.50
Samantha L. Hubley	0.30	125.00	37.50
Willis C. Conner	7.70	125.00	962.50
Para-Legal Clerk	4.00	30.00	120.00

JL 0089

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In Re SRBA, Case No. 39576

Page: 8
December 12, 2002
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JL 0090

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Page: 1
November 06, 2002
Our File Number: 21381

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Balance

21381-001 In Re SRBA, Case No. 39576

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Page: 1
November 06, 2002
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STATEMENT FOR PERIOD THROUGH 10/31/02

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Services Rendered

	Hours
10/01/02 CAP Long telephone conferences with Mr. Secrist - potential former BLM senior employee as expert witness and specific areas we will need his testimony to support.	0.70 199.50
10/03/02 CAP Telephone call from Larry Brown re experts for us and reports - will accept statement outlining general testimony of Gibson and Secrist. plus proposed exhibits, exchange of documents and depo schedule.	0.50 142.50
10/04/02 ALF Review preference docs with CAP.	0.10 18.50
10/07/02 ALF Confer with CAP re: preparation of experts for deposition and trial.	0.20 37.00
CAP Conference with Tony re Gibson testimony, documents for his review and exhibits from Tony's review of documents in Boise - begin review of document to be sent to Gibson, telephone conference with Secrist re testifying - potential conflict issues.	1.60 456.00
10/08/02 ALF Confer with CAP re: exhibits for trial.	0.30 55.50
CAP Review exhibit files used in summary judgment plus TGA applications - dependant property adjudication files; two conferences with Willis re finishing files - binders and exhibit binders for trial; conference with Tony re above exhibits and specifically those he felt were key - particularly re his memos re Shea properties - total time - 4.0 hours.	3.40 969.00

JL 0092

Joyce Livestock

Page: 2
November 06, 2002
Our File Number: 21381-001
Invoice Number: 27116

In Re SRBA, Case No. 39576

	Hours
10/09/02 CAP Telephone conference with Secrist - left detailed message re testifying as expert re Paul - left message - continue review exhibits and documents for identification and exchange, also re those which may be objectionable as alleged evidence of BIM water right under authority to regulate, brief conference with Tony.	1.70 484.50
10/15/02 CAP Telephone call to Paul, telephone conference with Larry re deposition and exhibit exchange on October 28th-30th and re status of experts - still waiting to hear from Secrist and re stipulation re exhibits - admissibility; conference with Tony re same and his prior memos, continue review exhibits, grazing records, adjudication records, Shea documents - total time 2.9 hours.	2.50 712.50
10/17/02 EPE Telephone conference with C. Pridgen re outstanding discovery, motions in limine, other pretrial motions, and trial preparation.	0.40 50.00
ALF Confer with CAP and Paul Nettleton re: trial preparation	0.70 129.50
CAP Telephone conference with EPE re motions in limine - limit BIM to evidence of beneficial use - agency issue - also re fact that same cows cannot be owned by two entities and issue of regulatory control of grazing is not control of water also review pleadings from Brown re evidentiary issues; telephone conference with Paul re Secrist - who never talked to Paul - Tony, Glen can rebut BIM testimony re policy issues - conference with Tony re patient application issues - grazing at the time and when Taylor Grazing Act application filed - telephone conference with Brown re exhibits; continue review of same - specifically applications of predecessors under Taylor Grazing Act.	1.80 513.00

10/18/02 CAP Conference with Willis and Margarita re organizing exhibits for trial; conference with Tony re same and his prior memo from review of files at BIM; telephone conferences with Harris, Larry Brown and Gibson re scheduling of depositions and exhibits exchange - deposition on 30th and telephone conference with Larry - will waive expert report but I will do an outline of Gibson testimony and gave him summary of expected testimony - also document exhibits by Gibson not mentioned in

JL 0093

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In Re SRBA, Case No. 39576

Page: 3
November 06, 2002
Our File Number: 21381-001
Invoice Number: 27116

	Hours
response to discovery; review our response - by Tony to requests for documents.	1.60 456.00
10/21/02 ALF Confer with CAP re: document summaries for trial.	0.10 18.50
CAP Conference with MVZ; two conferences with Tony re exhibits and trial issues and length; conference with Willis and Doug re indexing remaining exhibits, also begin review of Archive files - dictation re indexing same - I think patent and homestead files may be important, since they describe water rights and/or streams, etc.	1.80 513.00
10/22/02 WCC Review and organize exhibit documents per attorney Pridgen in preparation for upcoming hearing.	3.90 487.50
CAP Continue review of documents and identify exhibits for trial, relative conference with Willis re same; memo to Chad Gibson re scope of testimony and change of dates; afternoon telephone call from Dr. Gibson re his testimony.	1.80 513.00
10/23/02 CAP Telephone conferences re scheduling next week, review 1998 report prepared in IU by Gibson, review exhibits including 'BBB-1 and BBB-2' from IU - grazing meetings - Salt Lake 1936 - telephone conference with Brown claims Gibson memo has legal opinions and conclusions - will object; review Boltz report and exhibits - probably will be key to Larry's case; prepare memo to Gibson with documents for review - revise same; telephone conference with Paul re new schedule; telephone conference with Brown re exhibits - also he cites recent Supreme Court case - no citation for proposition that if no objection filed we lose also review 'two mile limit' provisions mentioned (cont'd on p. 2)	3.39 966.15
CAP (cont'd from p.1) by Boltz and Dolan in opinion in Ruling - does not apply here only re sheep - related dictation re exhibits and documents to send to Gibson.	0.01 2.85
10/24/02 CAP Telephone conferences with Brown re rescheduling - deposition on 30th, exhibits on 29th; telephone conference with EPE re motions to exclude - see memo from EPE re U.S. beneficial use contrary to law of case; long telephone conference with Chad Gibson re his testimony and documents we sent; locate title documents - abstract - review same.	1.90 541.50

JL 0094

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In Re SRBA, Case No. 39576

Page: 4
November 06, 2002
Our File Number: 21381-001
Invoice Number: 27116

	Hours	
10/25/02 ALF Confer with CAP re: identification of exhibits, preparation for expert deposition and preparation for trial.	1.50 277.50	
CAP Conference with Tony re Gibson testimony and exhibits; review and identify exhibits re exchange next Wednesday; conference with Tony re Gibson testimony - note U.S. not claiming a water right based upon federal law - review response to admissions, need to include all discovery as exhibits, responses to 'state all bases of claim'; subsequent conference with Tony re exhibits will check our discovery responses and supplement if necessary, also need to offer chain of title - Shea and Joyce and Nettleton also need dependent property adjudications including applications - review same - Oreana 2 and 3, Silver City - conference with Doug re patent files for exhibits; (cont'd on p. 2)		2.99 852.15
CAP (cont'd from p. 1) prepare questions for Gibson - grazing practices pre and post 1934, review title files - patent files to ID exhibits - total time 3.4 hours.	0.01 2.85	
10/28/02 ALF Confer with CAP and review documents and discovery responses for selection of exhibits at trial	1.70 314.50	
CAP Telephone call from Brown re potential settlement - he is anxious and schedule for Wednesday - documents and Friday deposition; review Gibson deposition transcript from LU case, begin review title - abstract documents for exhibits; conference with Tony re discovery responses - U.S. to admission requests and interrogatories also re using early BLM allotment map as exhibit and responses of BLM to discover - conference with Doug re locating and copying same; telephone conference with Gibson - left message re his statement in lieu of expert report - prepare draft of same for his review - also re Code section 42-113 - Gibson drafted amendments thereto stockwater rights; (cont'd on p. 2)	5.49 1,564.65	
CAP (cont'd from p.1) review summary judgment ruling in preparation for Gibson deposition and document production - total 5.8 hours.	0.01 2.85	

JL 0095

Joyce Livestock

Page: 5
November 06, 2002
Our File Number: 21381-001
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In Re SRBA, Case No. 39576

	Hours
10/29/02 ALF Confer with CAP and staff re: preparation of exhibits for trial, review summaries of documents and potential exhibits	2.40 444.00

CAP Two telephone conferences with Brown re exhibits and fact he relies on U.S. v. Morris re ownership of stockwater but case is re permit obtained by BLM for numbers; long telephone conference with Gibson re his testimony and revisions to memo to Larry; revise same as included by Gibson and per conference with Tony, total including travel 2.7 hours.

	1.70 484.50
10/30/02 ALF Confer with MVZ re: preparation for trial.	0.30 55.50

CAP Review potential exhibits including files and discovery responses by U.S. and title documents all in preparation for meeting with Larry, meeting with Larry Brown re exchange and identification of exhibits and those stipulated to and those we will file motions to exclude or object to; telephone conference with Gibson re his testimony and deposition, revise statement to Larry in lieu of expert report - total time 6.8 hours including travel.

	4.80 1,368.00
--	---------------

10/31/02 CAP Review U.S. discovery responses - interrogatories, admissions, review summary judgment reply by US-BLM all in preparation for Gibson deposition and to discuss with Gibson in preparation of his testimony; revise statement of Gibson testimony; review same with Larry Brown; afternoon telephone call from Paul re schedule (.1).

	1.80 513.00
	51.10 13,145.50

For Current Services Rendered

Timekeeper	Recapitulation	
	Hours	Rate
Elizabeth Ewens	0.40	\$125.00
Anthony L. Francois	7.30	185.00
Craig A. Pridgen	39.50	285.00
Willis C. Conner	3.90	125.00
		Total
		\$50.00
		1,350.50
		11,257.50
		487.50

JL 0096

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 6
November 06, 2002
Our File Number: 21381-001
Invoice Number: 27116

Balance Due

REDACTED

JL 0097

We appreciate your prompt response. Please call if you have any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Page: 1
October 10, 2002
Our File Number: 21381

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

BALANCE INCLUDES CURRENT WORK THROUGH 09/30/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 10/10/02

Balance

21381-001 In Re SREA, Case No. 39576

REDACTED

JL 0098

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
October 10, 2002
Our File Number: 21381-001
Invoice Number: 25475

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 09/30/02

Previous Balance

REDACTED

Services Rendered

	Hours	
09/06/02 CAP Telephone call from Paul - message re trial.	0.10	28.50
09/09/02 CAP Telephone conference with Paul Nettleton		
09/10/02 ALF Confer with CAP re: settlement issues.	0.60	171.00
09/16/02 EPE Update SRBA research relevant to continuing SRBA litigation.	0.10	18.50
09/18/02 EPE Update SRBA research including a search for newly published Special Master, Presiding Judge and Idaho Supreme Court opinions; draft memorandum re Special Master's Report and Recommendations for Basin Wide Issue 5-57.	0.10	12.50
09/23/02 CAP Review final settlement re Semanko clients - send same to Paul with memo re same and trial.	0.35	43.75
09/24/02 CAP Telephone call from Paul	0.50	142.50
	0.30	85.50
09/26/02 CAP Telephone call from Larry Brown re experts - still have not reached Secrist - tentatively scheduled for October 21 in Harris's office.		
	0.30	85.50
For Current Services Rendered	2.35	587.75

	Recapitulation	
Timekeeper	Hours	Rate
Elizabeth Ewens	0.45	\$125.00
JL 0099		
		Total
		\$56.25

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
October 10, 2002
Our File Number: 21381-001
Invoice Number: 25475

Anthony L. Francois
Craig A. Pridgen

0.10	185.00	18.50
1.80	285.00	513.00

Balance Due

REDACTED

JL 0100

We appreciate your prompt response. Please call if you have any questions regarding this statement.

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936

(415) 905-0200

TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
September 09, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 08/31/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 09/09/02

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0101

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
September 09, 2002
Our File Number: 21381-001
Invoice Number: 24415

STATEMENT FOR PERIOD THROUGH 08/31/02

Previous Balance

REDACTED

Services Rendered

	Hours	
08/01/02 CAP Telephone conference with Brown re preparation for trial and depositions - experts - Skinner, Gibson.	0.30	85.50
08/02/02 EPE Telephone conference with M. Bermudez re her questions concerning calendared due date for pre-scheduling conference submission; review file, SRBA summary sheet for subcases, and AO1 re same; call to CAP re same.	0.30	37.50
08/16/02 EPE Update SRBA research; begin review of new cases issued by presiding judge in SRBA (Consolidated Subcase 75-13316 Wild & Scenic Rivers Claims, Order on Motion to Participate/Intervene).	0.20	25.00
08/19/02 ALF Confer with CAP re: expert discovery.	0.10	18.50
CAP Telephone calls to experts re trial - left messages; long telephone conference with Chad Gibson re same and outline testimony and issues and facts of case - will send summary judgment briefs.	1.20	342.00
08/21/02 ALF Confer with CAP, EPE, and MVZ re: preparation for trial.	0.40	74.00

CAP Long telephone conference re Brown re trial setting conference - 8/22/02 - re exhibits I.D. before trial including T.G. Act adjudications and certain deeds, Motions to Limine re evidence and witnesses, bifurcation of trial - BLM first, experts and depositions - U.S. will not have any; conference with MVZ, Tony re same any of motion for Directed Verdict, also need to call Fred Price and need for bench memo.

JL 0102

1.20 342.00

Joyce Livestock

Page: 2
September 09, 2002
Our File Number: 21381-001
Invoice Number: 24415

In Re SRBA, Case No. 39576

	Hours
EPE Telephone conference with C. Pridgen, M. Van Zandt and A. Francois re trial preparation.	0.20 25.00
SXR Confer with MVZ, CAP, ALF & EPE regarding trail preparation.	0.40 50.00
08/22/02 ALF Telephone conference with Larry Brown re: trial preparation and scheduling and follow up discussion with CAP; telephonic scheduling conference.	1.10 203.50
CAP Conference telephone call with Tony F. and Larry re issues to be discussed with Dolan re trial, depositions and experts and dates - depositions in October - Larry will have no experts - also exchange of witnesses and exhibits; long conference telephone call with Dolan re trial setting and pre-trial discovery and motions - trial December 3rd, pre-trial and motions, November 21st.	1.20 342.00
08/26/02 ALF Confer with CAP re: interest in settlement of claim.	0.10 18.50
CAP Telephone messages from and to Paul	0.20 57.00
For Current Services Rendered	6.90 1,620.50

	Recapitulation	
Timekeeper	Hours	Rate
Elizabeth Ewens	0.70	\$125.00
Anthony L. Francois	1.70	185.00
Craig A. Pridgen	4.10	285.00
Samantha L. Hubley	0.40	125.00
	Total	
		\$87.50
		314.50
		1,168.50
		50.00

REDACTED

JL 0103

Joyce Livestock

In Re SREA, Case No. 39576

Page: 3
September 09, 2002
Our File Number: 21381-001
Invoice Number: 24415

Balance Due

REDACTED

JL 0104

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MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

BALANCE INCLUDES CURRENT WORK THROUGH 07/31/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 08/08/02

21381-001 In Re SRBA, Case No. 39576

Balance

REDACTED

Page: 1
August 08, 2002
Our File Number: 21381

JL 0105

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAXID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
August 08, 2002
Our File Number: 21381-001
Invoice Number: 23428

STATEMENT FOR PERIOD THROUGH 07/31/02

Previous Balance		REDACTED	
Services Rendered		Hours	
07/02/02 CAP	Revise motion to supplement record on motion for summary judgment proposed by EPE; telephone conference with EPE re same - purpose is to encourage Dolan to rule.	0.70	199.50
07/05/02 WCC	Organize and refile documents in case room.	0.40	50.00
07/09/02 CAP	Telephone conference with EPE re revised Motion to Supplement Record re Trout Ruling by Burdick - telephone call from Brown re claim as submitted it violates local rules -- total time .6 hours.	0.40	114.00
07/10/02 CAP	Telephone call from EPE - no restriction in Idaho re supplemental brief contents in cases of requesting judicial notice, telephone conference with Brown re same - he will file opposition.	0.40	114.00

EPE Review Administrative Order 1 and Idaho Rules of Civil Procedure regarding any rules that may limit content of motions to consider supplemental authority; telephone conference with C. Pridgen re same; call to L. Brown re United States' issues regarding supplemental authority.

07/12/02 ALF	Confer with CAP and EPE re: previous Joyce decisions and law of the case issues; research Joyce decision awarding 1985 priority date.	0.60	75.00
		1.50	277.50

CAP Two telephone calls from Larry Brown re opposition to our 'Law of the Case Motion' claims, Joyce is bound by 1983 priority from prior case because chain of title is the same - but this is different basin and 'observations' of Court are not law of case which he will raise with Dolan - perhaps we

JL 0106

Joyce Livestock

Page: 2
August 08, 2002
Our File Number: 21381-001
Invoice Number: 23428

In Re SRBA, Case No. 39576

Hours

should withdraw motion per Larry; two telephone conferences with EPE re Motion for Judicial Notice and Larry's proposed opposition and need to revise or amend same in view of telephone call from Larry and his e-mail - total time 1.2 hours.

0.80 228.00

EPE Telephone conference with C. Pridgen and A. Francois re conversation with Larry Brown and the United States' anticipated response to Motion to Supplement Record; telephone conference with A. Francois re order in previous Joyce Livestock case and impact, if any, on present litigation; call to L. Brown re pending Motion to Supplement Record and the United States' response to same.

1.40 175.00

07/15/02 CAP Review EPE responsive memo to Brown re motion to supplement the record re Trout decisions - revise, two telephone conferences with EPE re same - total time .7 hours.

0.40 114.00

EPE Review correspondence from L. Brown; discuss with C. Pridgen; draft response to L. Brown's letter addressing concerning applicability of the earlier Joyce Livestock decision; draft Citation to Supplemental Authority; draft Motion to Withdraw Motion to Supplemental Briefs in Support of Motion for Summary Judgment.

1.80 225.00

07/16/02 EPE Complete Motion to Withdraw Supplemental Authority and new Citation to Supplemental Authority.

0.20 25.00

07/25/02 ALF Review decision denying summary judgment, and confer with CAP and MVZ.

0.80 148.00

CAP Review Dolan's Ruling in Motions for Summary Judgment, merits of bringing Motion to Alter or Amend and whether procedure exists; telephone conference with EPE re same. question of fact re intent t

REDACTED

review

Wood's decision in IU; conference with MVZ re ruling; check evidence in Deeds re water rights and our exhibits re T.G. Act applications re water rights; afternoon telephone call from EPE re basis for appeal particularly re U.S. default and procedures under A01.

2.30 655.50

JL 0107

Joyce Livestock

Page: 3
August 08, 2002
Our File Number: 21381-001
Invoice Number: 23428

In Re SRBA, Case No. 39576

Hours

EPE Review Order Denying Joyce Livestock Motion for Summary Judgment and Order Setting Scheduling Conference; telephone conference with C. Pridgen re same; begin drafting memorandum to M. Van Zandt and C. Pridgen re recommendation in response to Order.

3.30 412.50

07/26/02 CAP Review EPE memo to Dolan Ruling and recommendations that we appeal - related review of 1998 decisions which Dolan misquoted, telephone conference with EPE re same - MVZ will have to decide and Paul; telephone conference with Paul and fax of opinion afternoon of 7/25/02, also language in Dolan opinion that District Court ruling was 'dicta' is not accurate since Hurlbutt incorporated Special Master ruling in Judgment; conference with MVZ re above - total time 1.9 hours.

1.50 427.50

MVZ Review of summary judgment order; analyze need for reconsideration.

0.75 213.75

EPE Complete initial draft of memorandum regarding recommended response to Special Master Dolan's Order Denying Joyce Livestock's Motions for Summary Judgment; telephone conference with C. Pridgen re same.

2.00 250.00

07/29/02 ALF Review EPE memo on permissive appeal and note to CAP re: recommendation, confer with CAP and EPE re: trial strategy.

1.00 185.00

CAP Telephone call from Brown - thinks Dolan settled nothing - is disappointed, also re experts - depositions and he will bifurcate trial.

0.40 114.00

CAP Conference with MVZ re appeal vs. trial; telephone conference with EPE re same - she talked to MVZ - probably should just go to trial - total time - .5; second telephone conference with EPE re trial preparation - bifurcate the trial - try U.S. claim first.

0.80 228.00

MVZ Telephone call with Ms. Ewens regarding request for reconsideration; confer with Mr. Pridgen.

0.85 242.25

EPE Telephone conference with M. Van Zandt; telephone conference with C. Pridgen & A. Francois re response to Court's ruling on summary judgment motion and preparation for trial.

1.50 187.50

JL 0108

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 4
August 08, 2002
Our File Number: 21381-001
Invoice Number: 23428

07/30/02 EPE Update filing and organize research binders in
anticipation of status hearing and trial.

Hours
1.00
24.80
4,786.00

For Current Services Rendered

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	11.80	\$125.00	\$1,475.00
Anthony L. Francois	3.30	185.00	610.50
Craig A. Pridgen	7.70	285.00	2,194.50
Michael J. Van Zandt	1.60	285.00	456.00
Willis C. Conner	0.40	125.00	50.00

Balance Due

REDACTED

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

JL 0109

McQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936

(415) 905-0200

TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
July 10, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 06/30/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 07/10/02

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0110

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
July 10, 2002
Our File Number: 21381-001
Invoice Number: 21974

STATEMENT FOR PERIOD THROUGH 06/30/02

Previous Balance

REDACTED

Services Rendered

	Hours	
06/06/02 ALF Review and organize discovery and case management materials and forward to file.	0.20	37.00
CAP Telephone conference with Larry Brown re status of settlement - will not respond pending negotiations with Semanko notwithstanding pending ruling by Dolan.		
	0.20	57.00
06/07/02 CAP Telephone conference Paul Nettleton		

REDACTED

06/24/02 WCC Reorganize case room per attorney Pridgen.	0.20	57.00
06/26/02 EPE Begin drafting Notice and Motion for Leave to File Supplemental Authority.	0.50	62.50
	0.90	112.50
WCC Review files and reorganize case room per attorney Pridgen.	2.75	343.75
06/28/02 EPE Complete draft of Joyce Livestock Company's Motion for Leave to Supplement Briefs in Support of Motion for Summary Judgment; draft memorandum to C. Pridgen and M. Bermudez re same.	1.80	225.00
WCC Review files and organize case room.	0.60	75.00
For Current Services Rendered	7.15	969.75

Recapitulation

Timekeeper	Hours	Rate
Elizabeth Ewens	2.70	\$125.00
		Total
		\$337.50

JL 0111

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
July 10, 2002
Our File Number: 21381-001
Invoice Number: 21974

Anthony L. Francois	0.20	185.00	37.00
Craig A. Pridgen	0.40	285.00	114.00
Willis C. Conner	3.85	125.00	481.25

Balance Due

REDACTED

JL 0112

We appreciate your prompt response. Please call if you have any questions regarding this statement.

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SAN FRANCISCO, CALIFORNIA 94105-1936

(415) 905-0200

TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
June 12, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 05/31/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 06/12/02

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0113

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
June 12, 2002
Our File Number: 21381-001
Invoice Number: 20739

STATEMENT FOR PERIOD THROUGH 05/31/02

REDACTED

Previous Balance

Services Rendered

	Hours
05/01/02 CAP Telephone conference with Paul Nettleton	0.20 57.00
REDACTED	
05/03/02 CAP Telephone call from Larry Brown re settlement offer - CAP proposed response - prepare counter-offer for Paul Nettleton.	0.60 171.00
05/06/02 CAP Telephone conference with Paul	0.30 85.50
05/07/02 ALF Confer with CAP re: settlement counter-proposal.	0.10 18.50
EPE Telephone conference with C. Pridgen re settlement discussions and conversations with client and L. Brown (United States) re same.	0.30 37.50
05/09/02 ALF Confer with CAP re: settlement issues.	0.10 18.50
CAP Long telephone call from Larry Brown re proposed terms of settlement offer - appears response by BLM will depend on significant part of what Semanko's clients do.	0.40 114.00
05/14/02 ALF Confer with CAP and MVZ re: settlement and potential ruling.	0.10 18.50
05/15/02 CAP Telephone conference with EPE - new ruling from Burdick - law of the case doctrine issue governs Special Master's rulings - review same - telephone conference with EPE - need to supplement brief re summary judgment motion; telephone conference with Larry Brown re response to settlement demand - wants to wait on what Semanko clients do - I	

JL 0114

Joyce Livestock

Page: 2
June 12, 2002
Our File Number: 21381-001
Invoice Number: 20739

In Re SRBA, Case No. 39576

disagreed also no response from his bosses yet.

Hours
1.30 370.50

EPE Telephone conference with CAP re filing
supplemental brief pending Motion for Summary
Judgment re law of the case doctrine (new Trout
decision); update SRBA research; review Trout
opinion.

0.60 75.00
4.00 966.00

For Current Services Rendered

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	0.90	\$125.00	\$112.50
Anthony L. Francois	0.30	185.00	55.50
Craig A. Pridgen	2.80	285.00	798.00

Balance Due

REDACTED

JL 0115

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any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
May 16, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 04/30/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 05/16/02

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0116

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 04/30/02

Previous Balance

REDACTED

Services Rendered

	Hours	
03/01/02 EPE Shepardize and update research relevant to dispositive motions.	0.70	87.50
WCC Review and organize exhibit and case file documents in preparation for filing of motion. Created document index on Summation database.	4.90	612.50
03/03/02 CAP Conference with Willis - paralegal re exhibits for motion, review Boltz Report and exhibits - identify exhibits for summary judgment - mainly patents, Shea Title documents, etc.	1.80	513.00
03/04/02 CAP Telephone call to Paul re two telephone conferences with Larry Brown - wants letter re our settlement proposal for Solicitor's office on behalf of Interior Department, Brown wants extension of trial date and motion date - told him on only if significant movement from BIM and Justice; telephone conferences with EPE re research of cases previously cited to verify no new rulings, also re interpretation of deeds and appurtenancies previously contained in deeds in chain of title, review deeds re water rights for exhibit, preparation of summary judgment.	5.60	1,596.00
EPE Research legal authority relating to the interpretation of language in deeds and tenet of law that effect must be given to each provision therein; draft memoranda to C. Pridgen re same.	3.00	375.00
WCC Review and organize exhibits in preparation for filing of court documents. Create index of same on Summation database.	3.80	475.00

JL 0117

Page: 1
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

Joyce Livestock

Page: 2
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

In Re SRBA, Case No. 39576

	Hours
03/05/02 ALF Confer with CAP re: Motions for Summary Judgment.	0.30 55.50

CAP Two telephone calls from Larry Brown re potential settlement - wants meeting in San Francisco with senior member of Department of Interior Solicitor's office - but still no sign of backing off of the U.S. wanting priority stockwater; response letter to Brown, continue preparation of motion for summary judgment - draft #1, telephone conferences with EPE re research and cases she found; review files re Snell property - private land - but we have claims - patented 1939 subject to vested rights - may include Nettleton and Joyce rights.

5.80 1,653.00

WCC Research files and organize exhibits per attorney Pridgen. Telephone call to F. Price regarding same.

2.70 337.50

03/06/02 ALF Confer with CAP re: motions for summary judgment.

0.20 37.00

CAP Two long telephone calls from Larry Brown re settlement - he will not file motion for summary judgment, may not file reply and wants hearing continued - told him I will call client and get back to him by Friday but doubt we will continue hearing on motion or trial - also wants to bring Assistant Attorney General of Environment and Natural Resources to San Francisco; finish draft #1 of summary judgment, begin preparation of exhibits re Deeds with water rights and chain of title - three conferences with EPE re her revisions; CAP p.m. review and revise draft of Motion; review additional cases cited by EPE - total time 9.8 hours.

8.40 2,394.00

EPE Work on motion for summary judgment and exhibits relating to same.

2.90 362.50

03/07/02 CAP Telephone calls to and from Larry Brown re settlement negotiations - also Brown wants continuance of trial and motion to pursue settlement; finish motion for summary judgment, exhibits, final revisions - total time - 7.3 hours.

JL 0118

6.30 1,795.50

EPE Draft language for summary judgment brief relating to Hage decision; draft memoranda to C. Pridgen re same.

0.60 75.00

WCC Assist with filing of motion in Idaho District Court. Organize exhibits for same.

4.70 587.50

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

	Hours	
03/08/02 CAP Three telephone calls from Larry Brown re his motion for summary judgment - will file with response and give us additional time to reply after hearing - told him again we will not move motion hearing or trial unless settlement also re designation of experts and depositions - meetings next week re settlement offer; telephone call from Brown re our motion which I faxed - he may not file a motion for summary judgment.	1.40	399.00
EPE Review brief in support of Motion for Summary Judgment; telephone conference with C. Bridgen re same.	0.50	62.50
03/11/02 CAP Telephone call to Paul re - two telephone calls from Larry Brown re same.	0.90	256.50
03/13/02 CAP Two long telephone conferences with Larry Brown re specific settlement offer by BLM equal to two day priority, ahead of BLM stockwater right, settlement not binding on other cases - no fees or costs - will not include rights of way; telephone conference with Paul re same - (.7 hours).	1.60	456.00
EPE Telephone conference with C. Bridgen re settlement offer from United States.	0.30	37.50
03/14/02 CAP Telephone calls to and from Larry Brown and Paul re terms of proposed settlement - - Larry thinks we should withdraw objections and re appurtenancy issues citing applications for grazing preferences - Anna stated she does not have water right and Shea did not assert rights on Jordan Creek - review grazing files - Larry is wrong re Shea - 1936 application, review Boltz analysis re same; review cases cited by Brown including Bromelt v. Ediger - also re telephone conference with Paul - res judicata - (cont'd on p. 2) issue of CAP (con'd from p.1) adjudication of grazing preferences by BLM/US under T.G. A.; telephone call for Larry - needs response to offer by 1.00 p.m. Friday.	1.30	370.50
	1.30	370.50

REDACTED

JL 0119

Joyce Livestock

Page: 4
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

In Re SRBA, Case No. 39576

03/15/02 CAP Two telephone conferences with Paul -

Hours

REDACTED

- two telephone conferences with Larry Brown re settlement and fact Norm S. has called - should have response to our counter offer by Monday but he is not optimistic.

1.00 285.00

03/18/02 CAP Telephone conference with Norm Semanko re proposed settlement - he was aware of general offer through Paul - Western Stockgrowers will hold out for 1897 priority date and his cases involve other issues; telephone conference with Paul in the afternoon

1.20 342.00

EPE Review Brumment v. Edgar re United States' position that a motion for summary judgment can be granted in favor of non-moving party; draft memorandum to C. Pridgen re same.

0.50 62.50

03/19/02 CAP Two telephone conferences with Larry Brown re status of settlement - attitude changed when BIM and Solicitor's attorneys found out about inquiries by other claimants - now unlikely to settle, also re Larry's brief and exhibits - will fax brief; dictation re need to call Harris re hearing, also preparation of files for trip - CAP begin review of BIM brief - review exhibits - Boltz Affidavit - travel total time - 4.4 hours; telephone conference with EPE re status of settlement and research memo on cases cited by Brown.

2.80 798.00

EPE Telephone conference with C. Pridgen re agency issues and other legal arguments which may be raised at oral argument/hearing.

0.20 25.00

03/20/02 CAP Morning telephone conference with Paul re

review BIM - Brown Response to Motion for Summary Judgment and BIM statement of undisputed facts still missing final response pleadings and five affidavits and exhibits from Larry Brown; afternoon meeting with Larry Brown re status of settlement - unlikely at this time - concern about Western Stockgrower's claims for settlement; three telephone conferences with EPE re her research of cases cited by Brown under new theories supporting BIM stockwater claim - range fees equal beneficial use and management of ranch under TGA gives U.S.

REDACTED

JL 0120

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 5
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

ownership of water rights.

Hours
4.20 1,197.00

EPE Complete review of United States' Response Brief; research legal authority in support of Reply Brief and in support of pending motion for summary judgment; telephone conference with C. Pridgen re same and preparation for hearing.

2.60 325.00

03/21/02 CAP Morning telephone conference with Paul re

afternoon telephone conference with Paul re preparation for hearing - review affidavits from Larry delivered at 4:00 p.m.; telephone conferences with EPE re research on cases cited in U.S. brief which we received Tuesday - review cases and Idaho Code Sections faxed by EPE, outline oral argument for hearing 3/22/02; two telephone conferences with Norm Semanko re status of settlement re Western Stockgrowers - total time: 6.8 hours.

REDACTED

5.80 1,653.00

EPE Research legal authority cited by United States in is brief in preparation for hearing; telephone conference with C. Pridgen re same.

1.60 200.00

WCC Research files for Warranty Deed per attorney Pridgen. Fax documents to C. Pridgen in Boise Idaho. Telephone conference with attorney Pridgen regarding same.

1.90 237.50

03/22/02 CAP Morning telephone conference with Paul; a.m. continue preparation for summary judgment hearing - review affidavits of US-BLM, exhibits, briefs, cases and statutes - and U.S. brief - finish outline of oral argument, attend hearing on motion; conference with Paul re - travel Boise to Oakland - total time 12.6 hours.

8.60 2,451.00

03/25/02 CAP CAP begin review of notes from hearing in preparation of reply brief - Larry argued that since we amended priority date we do not get presumption under SRBA - check Dolan Order - which specifically held there would be no new IDWR report, telephone conference with EPE - she will address U.S. response re U.S. stockwater right, outline issues from U.S. - Brown brief; begin review of Brown's cases and oral argument - citations.

2.40 684.00

JL 0121

Joyce Livestock

Page: 6
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

In Re SRBA, Case No. 39576

	Hours
EPE Telephone conference with C. Pridgen re Reply Brief and arguments raised by United States and Court at oral argument on 3/22/02.	0.60 75.00
03/26/02 CAP Preparation of reply brief re motion for summary judgment; telephone conferences with EPE re her portion on U.S. BLM claimed stockwater report - revise her draft, also review Kenney treatise and cases sent by EPE - total time 3.1 hours.	2.50 712.50
CAP Long telephone call from Larry Brown re new U.S. offer to settle - sent first to Norm - Larry will fax but gives ranchers priority except for improvements where U.S. has Decree; long telephone conference with N. Semanko re new proposed settlement by U.S. - some clients may take the offer - will need about a week - Norm concerned with priority issues and chain of title issues.	0.26 74.10
EPE Research additional authority from treatises (Hutchins and Kinney) re the transfer of water rights as appurtenances; research authority cited by United States in support of its argument tat management of rangeland constitutes a valid appropriation of water.	1.30 162.50
03/27/02 CAP Continue preparation of reply brief - revise EPE portion, dictation of brief re two points on U.S. claimed stockwater and re motion portion dealing with Joyce Livestock's stockwater - review and distinguish code sections and cases cited by Brown, related telephone conferences with EPE; review Supreme Court decisions - chain of title also early Supreme Court case - also re dictation on issues of priority date - U.S. and appurtenancy issues - total time 5.0 hours.	4.30 1,225.50
EPE Continue research in support of Reply Brief; telephone conference with C. Pridgen re same; draft argument to rebut the United States' claimed water rights.	4.80 600.00
WCC Perform Internet research on Lexis-Nexis per attorney Pridgen. Obtain case summary from same.	0.20 25.00

03/28/02 CAP Telephone conferences with EPE re Reply Brief and her portion of brief and cases cited by U.S. claimed stockwater, finish and revise reply brief - including review cases cited by Larry Brown and

JL 0122

Joyce Livestock

Page: 7
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

In Re SRBA, Case No. 39576

	Hours
revise EPE's portion of brief, telephone Special Master Dolan and Brown re CAP not filing objections to US affidavits based upon fact same are legal opinions or conclusions of law and stipulation that same are not waived at trial; telephone conferences with Larry Brown and review e-mail of proposed settlement from BIM - same conditions are problematic.	5.40 1,539.00
EPE Continue drafting argument in support of argument that the United States' claimed water rights should be dismissed (Reply Brief); telephone conference with C. Pridgen re same.	3.10 387.50
03/29/02 CAP Conference with Willis re organization of exhibits - pleadings re Joyce and new files re summary judgment - total time . 5 hours.	0.30 85.50
EPE Review final Reply Brief; discuss same with C. Pridgen.	0.70 87.50
WCC Telephone call to E. Ewens regarding case research matter.	0.10 12.50
04/01/02 CAP Long telephone conference with Norm Semanko re status of settlement offer and response by his clients - will probably have a response next week - telephone conference with Larry Brown re same and if our client should respond - he thinks BIM will not settle unless Norm's clients or most of them settle although he is not sure why all parties should have same option.	0.40 114.00
04/02/02 WCC Review and organize pleading and research documents.	2.70 337.50
04/03/02 CAP Telephone conference with Diane - court reporter - order transcript of hearing on motion for summary judgment; telephone conference with Larry Brown re status of new settlement offer to Semanko's clients - CAP review e-mail of same; conference with EPE re 'general conditions' which may depending upon final language lead to U.S. BLM defense to future takings claims.	0.70 199.50
WCC Review and organize documents. Created attorney work binder.	1.10 137.50

JL 0123

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 8
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

	Hours	
04/09/02 CAP Long TC Chad Gibson re expert testimony for trial re historic use - Jordan Creek; he is also familiar with old laws in Idaho re serving of ranchers who trespass on their customary range; also issue we want him to focus on.	1.20	342.00
04/10/02 CAP Long TC from Norm Samenko re status of settlement negotiations - recent offer by Larry Brown - his clients want senior priority, one day junior to BLM is not acceptable and requirement of chain of title is questioned, review e-mail of offer from Norm, review e-mail of unofficial offer for a client from Brown.	0.20	57.00
04/11/02 CAP Long TC Larry Brown - proposes Joyce gets 1898 right - BLM - 1934 with language sent by fax are non-negotiable came from Solicitor's Office and BLM must have right to 'manage the range' - authorized by FLIPMA and Public Range Management Act - told him we should first reference the code sections not rewrite them; conference Willis re trial preparation - instructions re exhibit binders and title documents; Cushman out 2-3 weeks, medical per Brown during 2nd TC - also Brown wants answer by next Friday - formal offer to follow by Monday	1.60	456.00
WCC Review of documents produced by opposing counsel per attorney Pridgen.	2.30	287.50
04/12/02 CAP Dictation re documents to send to Chad Gibson and memo re scope of his testimony	0.40	114.00
EPE Telephone conference with C. Pridgen re conversations with L. Brown re settlement; discuss advisability of settlement versus going to trial.	0.40	50.00
WCC Review documents obtained from L. Brown. Conference with attorney Pridgen regarding same.	1.30	162.50
04/15/02 CAP Review offer to settle from Brown, memo to Paul re same; conference MVZ re same; TC Brown re same with my initial concerns involving general provisions and reservations by BLM	1.30	370.50
04/16/02 CAP TC Paul re settlement -		
REDACTED		
CAP Long TC EPE re her thoughts re offer to Joyce and	0.60	171.00
JL 0124		

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 9
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

	Hours
draft - not yet made - offer per CAP; TCs Brown particularly limiting and restrictive language BLM wants and effect on takings claims particularly in situ and riparian rights	0.20 57.00
EPE Review written settlement offer from L. Brown; telephone conference with C. Pridgen re same.	0.80 100.00
CAP Long TC EPE re her thoughts re offer to Joyce and draft - not yet made - offer per CAP; TCs Brown, particularly limiting and restrictive language BLM wants and effect on takings claims particularly in situ and riparian rights.	0.40 114.00
04/17/02 ALF Confer with CAP re: settlement offer made by United States, and trial preparation.	0.60 111.00
CAP Conference MVZandt, Tony re status of settlement and issues re limiting general provisions; all agree US trying to change legal authority undermining Mining Act and Huge case, etc.; gives too much authority to BLM to regulate AUMs impacting takings claim; dictation Willis re preparation for trial; TC from Brown re settlement and calling Dolan; I disagree also re Gibson deposition April 29 or 30	1.50 427.50
04/18/02 CAP TC Larry Brown re CAP and client concerns re offer and extension of time to respond and re my conversus wish extra conditions in offer which try to modify existing law.	0.30 85.50
REDACTED	
04/19/02 CAP TC Paul Needleton CAP will draft same including revising general language; TC Larry Brown re extension of time to respond, one week and clients' concerns re contents of general conditions of offer; review fax order from Dolan; trial vacated to allow time for ruling, total time - .6 hours.	0.40 114.00
04/20/02 CAP TC Paul re	0.20 57.00
04/25/02 CAP Telephone calls from Norm Semanko re status of settlement negotiations by Western Stockgrowers - close to settlement - still negotiating re priorities on sources where BLM has a license - exchanged messages - CAP will call Friday.	0.10 28.50

JL 0125

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 10
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

Hours

04/26/02 CAP Long telephone conference with Norm Semanko re status of negotiations with BIM - they backed off of conditions and restrictions, U.S. wants water right dated the date of license and of decreed, U.S. wants priority - if licensed to U.S. and ranchers can show chain of title and prior use they get one day priority - PWR still being negotiated - we both think that after settlement action can be brought to have U.S. rights declared forfeited.

0.20 57.00

CAP Preparation of proposed settlement response - letter to Paul - revise same.

0.60 171.00

For Current Services Rendered

134.86 30,277.10

Recapitulation

Timekeeper	Hours	Rate	Total
Elizabeth Ewens	24.60	\$125.00	\$3,075.00
Anthony L. Francois	1.10	185.00	203.50
Craig A. Pridgen	83.46	285.00	23,786.10
Willis C. Conner	25.70	125.00	3,212.50

Total Current Work

JL 0126

Joyce Livestock

Page: 11
May 16, 2002
Our File Number: 21381-001
Invoice Number: 19863

In Re SRBA, Case No. 39576

Balance Due

REDACTED

JL 0127

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
March 20, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 02/28/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 03/20/02

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0128

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
March 20, 2002
Our File Number: 21381-001
Invoice Number: 16967

STATEMENT FOR PERIOD THROUGH 02/28/02

Previous Balance

REDACTED

Services Rendered

02/04/02 CAP Telephone call from Paul

Hours

- one change - did not return telephone
call - brief review of Gene Lewis depositions

0.40 114.00

02/11/02 CAP Review deposition corrections - clients - none -
corrections by three of Brown's witnesses,
telephone conference with Janet Arnel - missing
corrections by Madenford, related dictation to
include with transcripts.

1.00 285.00

02/18/02 EPE Telephone conference with C. Pridgen re Hage
decision and relevance to pending motions.

0.60 75.00

CAP Long telephone conference with EPE re research
assignment to check cases previously cited and
mentioned by U.S. BLM - Brown, also to update cases
we used last year for IU trial to see if they are
still valid and/or any new cases; review IU brief
used last year and U.S. brief as part of
preparation for summary judgment and to anticipate
what Larry Brown will rely upon; review new Hage
decision to include re grazing rights - begin
organizing title documents with patent documents to
submit to Brown in attempt to stipulate to chain of
title issues.

JL 0129

3.70 1,054.50

02/19/02 CAP Continue preparation of exhibits for motion -
appears we are missing some of chain of title -
some documents allegeable - CAP call Brown - left
message - begin pulling exhibits from BLM records -
dictation re organizing all exhibits.

1.80 513.00

Joyce Livestock

Page: 2
March 20, 2002
Our File Number: 21381-001
Invoice Number: 16967

In Re SRBA, Case No. 39576

	Hours
02/20/02 CAP Telephone conference with Larry Brown re stipulation re documents for summary judgment motion; telephone conference with Attorney Ling re his opinion on Special Master Dolan ruling in our motion if Cushman has not yet ruled on L.U. case; continue review of documents for exhibits, conference with Tony re his summary - located missing Shea patents, and title documents - review revised report - grazing summary and additional documents from BLM witness - Boltz - dictation re having all BLM documents organized for motion and trial if necessary; review Boltz deposition.	3.00 855.00
02/21/02 CAP Review and organize patents and homesteads as exhibits for motion - dictation to Willis and Margarita re Bates stamped documents - total time 2.8 hours.	1.80 513.00
02/22/02 CAP Review Lewis deposition for affidavit and/or to be cited in Brief, begin review of Paul's deposition, telephone conference with Ling re any particular form SRBA wants for motions for summary judgment also his opinion on Dolan's likelihood to rule since Cushman has not on LU Ranches case; conference with Willis re exhibits.	3.00 855.00
02/24/02 CAP Review and organize exhibits from BLM files produced with title documents all re history of base property title and post-1934 BLM allotment files, permit files and adjudication files - all re preparation of exhibits for summary judgment motion; review and outline Paul's deposition for motion - noting he needs to supplement testimony re mining claims.	3.50 997.50

02/25/02 CAP Finish deposition - Paul for motion; long telephone call from Larry Brown re potential for settlement and wants to continue trial, still wants water right with same property - relies upon Hunter case and discounts Hage decision - also Beck Water Treatise 1991 - telephone conference with Paul re mining claim issues - location - will stipulate to Fred's map, also discussed appurtenancy issues - from old deeds also right of way and ditch rights Paul has pre-1976 - he will provide documents from County; continue preparation of documents and exhibits for Motion Brief - also begin to identify all historic deeds which reference specifically grazing rights, ditch rights and water rights

JL 0130

Joyce Livestock

Page: 3
March 20, 2002
Our File Number: 21381-001
Invoice Number: 16967

In Re SRBA, Case No. 39576

(cont'd p. 2)

	Hours	
	1.60	456.00

CAP (con'd from p. 1) telephone conference with EPE to research whether such references became appurtenances which transfer with subsequent deeds - total time: 4.0 including conference with MVZ.

1.60	456.00
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02/26/02 CAP Continue preparation for trial - documents from BIM and title to be used as exhibits - identify missing and illegible title documents - including patents - for list to Brown to supplement exhibits file jointly with motions, NOTE: title documents are incomplete - and errors made by title company should call for discount - CAP supplement same from Archive records received last year - total time: 4.3 hours.

3.60	1,026.00
------	----------

02/27/02 CAP Long telephone conference with Brown re response to his letter asking for settlement offer - we want ownership of water pre-1934, grazing per Hage, no waivers - he said send letter; telephone conference with Paul in afternoon conference with Willis re Bates stamping exhibits and trial binders; finish review documents and deeds re 'water and ditch rights' outline argument; telephone conference with EPE re research re interpretation of deeds - total time: 4.2 hours.

REDACTED

3.20	912.00
------	--------

WCC review and organize exhibits in preparation for filing of motion.

4.90	612.50
------	--------

EPE Telephone conference with C. Pridgen re arguments relating to interpretation of language in deeds (in support of dispositive motions).

0.40	50.00
------	-------

02/28/02 CAP Telephone conference with Brown - confirming our offer for settlement - with letter to follow.

0.20	57.00
------	-------

WCC Telephone call to Larry Brown regarding exhibit lists. Organize and review exhibits in preparation for filing of motion.

1.70	212.50
------	--------

For Current Services Rendered

36.00	9,044.00
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Timekeeper
Elizabeth Ewens

Hours	Rate	Total
1.00	\$125.00	\$125.00

Craig A. Pridgen

28.40	285.00	8,094.00
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Willis C. Conner

6.60	125.00	825.00
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JL 0131

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 4
March 20, 2002
Our File Number: 21381-001
Invoice Number: 16967

Balance Due

REDACTED

JL 0132

We appreciate your prompt response. Please call if you have any questions regarding this statement.

McQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
February 20, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 01/31/02,
PRIOR BALANCES, AND PAYMENTS THROUGH 02/20/02

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0133

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 01/31/02

Page: 1
February 20, 2002
Our File Number: 21381-001
Invoice Number: 15343

Previous Balance

REDACTED

Services Rendered

Hours
0.40 74.00

01/02/02 ALF Confer with EPE, CAP, and MVZ re: letter from IDWR
re: US Amended claims and discovery.

CAP Conference with MVZ, EPE and ALF - water group re
Idaho issues - status of appeal re default decrees,
depositions next week - issues for Price re U.S.
claims; two telephone conferences with Paul re
from Brown re same; preparation for depositions;
dictation re exhibits to be sent to Idaho;
telephone conference with Harris re confirming
deposition - issues he found.

REDACTED

1.80 513.00
0.55 156.75

01/03/02 MVZ Confer with Mr. Bridgen regarding schedule.

ALF Confer with CAP re: memo from Michael Boltz
analyzing grazing records, and preparation for
depositions.

0.40 74.00

CAP Two telephone calls from Larry Brown re disclosing
Mr. Boltz's declaration, also other reports Larry
is getting from his witnesses and his faxed amended
notices of depositions and requests for documents -
send above to Paul; initial review of Boltz
declaration - summary of documents; letter to Paul
re same, conference with paralegal Willis re
preparing binder of documents referenced in Boltz
declaration; conference with Tony re Boltz summary;
begin preparation for depositions.

2.30 655.50

WCC Reviewed and organized exhibits to assist attorney
preparation for upcoming depositions.

2.90 362.50

JL 0134

Joyce Livestock

Page: 2
February 20, 2002
Our File Number: 21381-001
Invoice Number: 15343

In Re SRBA, Case No. 39576

	Hours
01/04/02 MVZ Confer with Mr. Prigden regarding depositions next week in Idaho.	0.65 185.25

ALF Review Boltz memo and confer with CAP re: interpretation of grazing records.

2.20 407.00

CAP Continue review of Declaration from Mr. Boltz, related conference with Tony F. re having him review and comment on same; dictation re files to be sent to Boise; begin preparation for depositions particularly Price; conference with Tony re same - also re mining claims; review memo from Tony re Oreana/Jordan areas; telephone conference with Brown re does U.S. contend Shea/Joyce did not graze in headwaters of Jordan and re using Snell grazing areas; begin using Snell grazing areas; begin deposition questions for Boltz deposition; conference with paralegal Willis re his outline of Boltz declaration and binder of exhibits.

3.40 969.00

WCC Reviewed and organized exhibits in preparation for depositions. Created deposition binder for attorney Prigden.

5.40 675.00

01/05/02 CAP Telephone conference with Larry Brown re changes in deposition schedule and additional responsive declarations and documents for depositions, report - revised and supporting documents re Boltz deposition; prepare files to be shipped to Idaho.

1.60 456.00

01/06/02 CAP Conference - Boise - Larry Brown re depositions this week, amended Director's report re amended claims - still do not have - will call Dolan to amend order; preparation for deposition of Fred Price and Madenford, total time including travel - 6.3 hours.

2.50 712.50

01/07/02 CAP Deposition of Fred Price - to be finished 1/8/02; telephone conference with Paul re meetings 1/8/02 and Price deposition based upon conference with Brown as to what he wants Gary Madenford to testify to, prepare for deposition of Mr. Kay including of additional documents produced during deposition of Price including Mr. Kay's file on Jordan Creek/Silver City; telephone conference with Tony re issue raised by Price for his input.

JL 0135

8.40 2,394.00

WCC Completed deposition binder and indexing of exhibit documents.

1.80 225.00

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
February 20, 2002
Our File Number: 21381-001
Invoice Number: 15343

	Hours	
01/08/02 ALF Confer with CAP and Paul Nettleton, review memo from WC and documents used by US experts, map exhibits forwarded by US.	1.00	185.00
CAP Conclude deposition of Fred Price; meeting in Murphy with Paul Nettleton and Gene Lewis, depositions of Mr. Madenford and Mr. Kay; review additional documents received from Brown supplementing documents for Mr. Boltz - general preparation for Boltz deposition.		
	10.50	2,992.50
01/09/02 ALF Confer with CAP re: discovery and depositions.	0.50	92.50
CAP Deposition of Gene Lewis and Paul Nettleton at Harris office; deposition of Mr. Boltz.		
	7.80	2,223.00
01/10/02 MVZ Confer with Mr. Bridgen regarding depositions.	0.25	71.25
01/11/02 ALF Review notice of hearing on US motion to file late claims, and message to CAP re: whether this was already granted or not.	0.20	37.00
01/14/02 ALF Confer with CAP re: US documents re: partial decrees for subcases at issue.	0.10	18.50
CAP Conference with Tony re U.S. motion to amend claims - lack of verification and related issues for summary judgment; begin review new documents received from Fred Price - Bates Stamp numbers 4484-4735 - need to compare with Boltz deposition and declaration.		
	1.70	484.50
01/15/02 CAP Continue review of documents from Fred Price supplementing discovery and to be used to support BLM Summary Judgment Motion.		
	1.00	285.00
01/16/02 CAP Review additional documents sent by Fred Price and documents presented at Boltz depositions as supplemental re grazing practices and history; telephone call message from Paul Nettleton re documents; telephone conference with Fred Price - sending revised maps plus additional documents from Boltz.		
	2.30	655.50

01/17/02 CAP Conference with Tony re grazing history and title issues, review documents from Boltz deposition - still waiting for additional documents from Fred Price - outline motion for summary judgment, related review of U.S. claims as amended - new map

JL 0136

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 4
February 20, 2002
Our File Number: 21381-001
Invoice Number: 15343

from Fred Price.

Hours
1.40 399.00

01/18/02 CAP Long telephone conference with Paul Nettleton re telephone

conference with Brown to identify same due today - he granted two-week extension, letter to Brown re same and discovery; long telephone conference from Fred Price re additional documents they will use for summary judgment - will send along with revised maps; review faxed amended claims - U.S. has hard copy of original electronic claims filed.

REDACTED

1.50 427.50

01/21/02 CAP Begin organizing title documents by U.S. claims and overlap with each Joyce claim all re preparation of Summary Judgment motion and in an attempt to get stipulation of facts with BLM - Brown is working on same analysis - we will attempt to agree or disagree by 1/28/02.

1.00 285.00

01/22/02 CAP Telephone call from Larry Brown re error in Dolan Order re cases 51-11061, et al. - no Standard Form 5 filed - Larry will call Dolan, also re status of deposition transcripts; begin review of Boltz revised summary of allotments which supplements his deposition testimony.

1.20 342.00

01/23/02 CAP Review Order from Dolan - appears to be in error - telephone conference with Larry Brown re same reference to Standard Form 5, settlements is in error - Brown to call Dolan re Motion to Amend Claims by U.S.

0.50 142.50

01/24/02 CAP Telephone call from Brown re deposition transcripts - delayed - he may want to continue time to file summary judgment pleadings - he will check with reporter; research cases in support of Motion for Summary Judgment - SRBA prior cases involving such motions, Idaho Superior Court cases, and Superior Court case re validity and presumptions re IDWR Reports, also 'stockwater' references.

1.80 513.00

01/25/02 CAP Review fax memo and proposed motion to continue trial and summary judgment for 2-3 weeks; long telephone call from L. Brown re same and facts he will stipulate to in motion and what he will not - including fact that predecessors before Paul intended to convey stockwater with property and Larry's objections to our proposed affidavits and exhibits - also re deposition transcripts -

JL 0137

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 5
February 20, 2002
Our File Number: 21381-001
Invoice Number: 15343

Hours

reporter was out ill - probably by Wednesday - call from Brown was 1.2 hours alone, also continue review title documents - also Brown through Price sending supplement documents from Boltz - total time - 2.1 hours.

1.80 513.00

01/29/02 CAP Telephone conference with Paul

0.30 85.50

01/30/02 CAP Two long telephone conferences with Larry Brown re continuance of trial and motions for summary judgment and re timing of having deposition transcripts; revise Larry's motion to Dolan, second telephone conference with clients, need to review and revise depositions by 2/6/02; new trial May 6th - per Brown subject to Dolan; motions due March 8th - also discussed with Brown, terms of stipulation re facts on title and grazing historic use issues - CAP will advise after cross checking Boltz's amended declaration and exhibits with file I previously outlined - BLM records.

1.90 541.50

01/31/02 CAP Two telephone conferences with Brown, two telephone conferences with Paul re

review of

deposition transcripts - Madenford and Boltz - total time - 1.9 hours.

1.60 456.00

For Current Services Rendered

72.65 18,609.25

Recapitulation

Timekeeper	Hours	Rate	Total
Anthony L. Francois	4.80	\$185.00	\$888.00
Craig A. Pridgen	56.30	285.00	16,045.50
Michael J. Van Zandt	1.45	285.00	413.25
Willis C. Conner	10.10	125.00	1,262.50

REDACTED

JL 0138

Joyce Livestock

Page: 6
February 20, 2002
Our File Number: 21381-001
Invoice Number: 15343

In Re SRBA, Case No. 39576

Balance Due

REDACTED

JL 0139

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936

(415) 905-0200

TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
January 08, 2002
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 12/31/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 01/08/02

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0140

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 12/31/01

Previous Balance

Services Rendered

	Hours	
12/03/01 ALF Confer with CAP re: location of further potentially responsive records in US files.	0.10	18.50

REDACTED

CAP Conference with MVZ, conference with Tony re need to supplement production of records demand based upon documents Bracketts found from files not disclosed previously by Fred Price - CAP to do demand letter to Brown - appears they are not providing files - Tony and CAP prepared new - detailed list of potential file designations - AMP etc., Allotment Management and District Management files, etc., - all of which should have been produced in response to prior discovery - continue review of title documents to complete chain re John T. Shea.

1.20 342.00

12/04/01 ALF Review order granting leave to amend and research re: effect of same on presumption from director's report.

0.30 55.50

CAP Long telephone call from Larry Brown re status of proposed policy changes - BLM may have to resolve stockwater issues but will focus on range improvements and management issues to regulate water use and environmental issues, also re what client wants to settle - although he has no immediate authority - also U.S. wants water rights on allotment which was subject to prior lease re AUMs to Joyce terminated in 1999 - review 55-10135 and 11385 re Edith Nettleton; also re additional documents and response to our supplemental discovery demands - conference with Tony F. re same; review court orders of 12/4/01 re motion to amend claims - (cont'd on p. 2)

JL 0141

0.65 185.25

Page: 1
January 08, 2002
Our File Number: 21381-001
Invoice Number: 13616

Joyce Livestock

Page: 2
January 08, 2002
Our File Number: 21381-001
Invoice Number: 13616

In Re SRBA, Case No. 39576

Hours
0.65 185.25

CAP (con'd from p.1) priority date and effect of order that no new Director's Report would issue and new Trial Scheduling Order - also Larry telephone conference re extension of time to respond to discovery and re his response to our objections to amended U.S. claims; conference with Tony re same, telephone conference #3 - Brown re depositions in January may move to 11/14 because of hearings January 10th.

12/07/01 CAP Long telephone conference with Norm Schemanko re recent developments in DC re stockwater policy issues - appears proposal will focus on private owners of water rights - still subject to Justice Department OK - but likely no competing U.S. right unless decreed - Norm will review and revise proposed mailing; second telephone call from Norm re new developments from Myers' office - will check Monday.

0.60 171.00

12/10/01 ALF Confer with CAP re: use of Gibson and Secrist as potential expert witnesses.

0.30 55.50

CAP Conference with Tony re potential experts - Chad Gibson and Glenn Secrist - also re issues involving lease - which terminated - probably on Snell property - need to check is allotment being used - who owns water rights - telephone conference with Larry re above lease and outstanding discovery issues - documents from BLM still missing; review Order re our motion to amend priority date to 1898 - granted - but no Director's Report to be issued - conference with Tony re same and our response - without Director's Report we do not get the presumption of validity - and impact on our summary judgment motion; second telephone call from Brown re same.

1.30 370.50

12/11/01 CAP Telephone conferences with Brown re deposition schedules week of January 7th - his witnesses; letter to Brown re discovery/depositions, brief review - title, documents from Brown re lease he claims has expired and was not subject to stockgrazing.

1.80 513.00

12/12/01 CAP Review additional documents received from BLM in response to discovery demands; continue review of Alliance Title documents pursuant to telephone call from Brown on December 11 re BLM claims that

JL 0142

Joyce Livestock

Page: 3
January 08, 2002
Our File Number: 21381-001
Invoice Number: 13616

In Re SRBA, Case No. 39576

	Hours
	1.40 399.00

grazing on allotments were interrupted thus defeating priority date pursuant to Larry Brown - and specifically on leased land.

12/13/01 CAP Three telephone calls with Brown re no new policy change, BIM will be more aggressive re stockwater and improvement - trespass issues and BIM has revised its position re settlements to try to eliminate situations which would give rise to a takings claim, and scheduling depositions - Paul and Lewis for 1/9/02 also re this case Larry thinks it will go 'all the way' based upon new policy - at least through summary judgment unless we get rulings re LU cases - BIM will attack Joyce ownership interests and priority date - BIM will only settle if Joyce takes a junior water right - CAP to do amended depositions per discussion with Brown; draft letter to Paul; review fax from Brown re terms of settlement.

2.10 598.50

12/14/01 CAP Long telephone conference with Larry Brown - revised deposition schedule and supplement by U.S. to document production also title issues plus documents we want from Fred Price - status memo to Paul.

1.20 342.00

12/17/01 ALF Confer with CAP re: procedural status of stipulation to obtain directors report for amended claim, and outline of facts to be drafted for stipulation of facts in support of motions for summary judgment.

0.50 92.50

CAP Two telephone calls from Brown - wants to do Lewis and Paul on 9th - need to check location - maybe Murphy or Caldwell - also Larry outline testimony and documents for all of his witnesses - I think we can stipulate re testimony of Mr. Mallis, they saving deposition and trial time but need to check his testimony re P.O.U. within which allotments - Larry will produce Fred and Madenford on 7th, Kay on 8th and withdraw one witness discussed at length if we can stipulate to facts to get case resolved by motion for summary judgment - will discuss stipulations during depositions on 7th - 9th to save more discovery and maybe avoid trial - Brown acknowledges at least Shea (cont'd to p. 2)

1.00 285.00

CAP (cont'd from p. 1) put in application he has been using water since 1898 - key: Larry may stipulate

JL 0143

Joyce Livestock

Page: 4
January 08, 2002
Our File Number: 21381-001
Invoice Number: 13616

In Re SRBA, Case No. 39576

Hours

that Director's Report can issue notwithstanding Dolan's order - this will give us the presumption that this is true priority date - also Larry claims no SRBA ruling to date whether U.S. BIM can or cannot own a water right - this remains key issue; conference with Tony re above - we think getting stipulation on Director's Report will help summary judgment; memo to Paul re

- total time: 2.8 hours. 1.00 285.00

12/18/01 MVZ Confer with Mr. Bridgen on status and discovery issues.

0.50 142.50

CAP Larry called re more changes in scheduling of depositions - also I told him we would be in the Caldwell on 9th per telephone conference from Paul - finish revised notices of depositions and production of documents - total 1.3 hours.

0.60 171.00

12/19/01 CAP Telephone call - message from Paul - depositions on 9th in Caldwell at 8:30 a.m. - telephone conference with Larry Brown re scheduling one of U.S. witnesses in Caldwell on January 9th - CAP will have to meet Paul on 8th.

0.40 114.00

12/20/01 CAP Telephone call from Brown re revisions in deposition schedule - revise notice of depositions; second telephone call from Brown re title issues, additional responses to document production being mailed and re 'Leases' in allotments having been terminated.

0.90 256.50

12/27/01 ALF Review documents produced by Larry Brown in response to supplemental discovery requests and confer with CAP re: same.

0.30 55.50

CAP Telephone call from Brown re conflict in deposition schedule on 9th, will do Lewis - Paul in the morning - Boltz in the afternoon - review supplemental discovery response documents from BIM sent by Brown; telephone conference with Brown re same, conference with Tony re same and how they may help clarify issues raised by Tony in his memo - new documents include trespass claims - also 1966 grazing use report - Jump Creek and other reports showing historic use of allotments before and after 1934-specifically 1932.

1.80 513.00

REDACTED

JL 0144

Joyce Livestock

Page: 5
January 08, 2002
Our File Number: 21381-001
Invoice Number: 13616

In Re SRBA, Case No. 39576

12/28/01 ALF Review correspondence from atty Harris re:
scheduling and confer with CAP re: preparation for
depositions.

Hours

0.20	37.00
18.80	5,188.00

For Current Services Rendered

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Anthony L. Francois	1.70	\$185.00	\$314.50
Craig A. Pridgen	16.60	285.00	4,731.00
Michael J. Van Zandt	0.50	285.00	142.50

Balance Due.

REDACTED

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

JL 0145

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
December 13, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 11/30/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 12/13/01

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
December 13, 2001
Our File Number: 21381-001
Invoice Number: 13107

STATEMENT FOR PERIOD THROUGH 11/30/01

REDACTED

Previous Balance

Services Rendered

	Hours
11/05/01 MVZ Confer with Mr. Francois regarding discovery and trial preparation.	0.35 99.75
11/06/01 CAP Conference with MVZ re case status - discovery issues; review latest discovery responses and notices from U.S. - Brown re depositions/documents.	0.80 228.00
11/07/01 EPE Telephone call with M. Van Zandt and C. Bridgen re: status of cases and upcoming dispositive motions.	0.30 37.50

CAP Water group meeting re remaining discovery - CAP memo to client; telephone conference with Brown re depositions - also title report due out this week on base property - EPE will get file to complete discovery and for summary judgment motions to reduce costs and fees - conference with Tony in the afternoon re above, continue review of documents from Fred Price - total time - 1.4 hours.

1.00 285.00

11/08/01 CAP Long telephone call from Larry Brown re depositions and documents; CAP response to Brown's production DEMANDS - supplementing earlier response, scheduling deposition, Brown's revised list of witnesses, begin notice of deposition; memo to Paul review additional documents produced by Larry Brown.

REDACTED

1.80 513.00

11/09/01 CAP Finish form notice of depositions and document production re Fred Price - limited research, telephone call from Brown - revising schedule, begin written response to U.S. supplemental demand for discovery; two telephone conferences with Brown re availability of witnesses; related review of documents.

JL 0147

2.00 570.00

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
December 13, 2001
Our File Number: 21381-001
Invoice Number: 13107

Hours

11/12/01 CAP Preparation of status memo to Paul Nettleton; conference with Tony re same; telephone call from Brown re same - message - retained - he is out - continue review documents - title from Harris; related preparation of supplemental response to depositions - draft deposition notices for U.S. witnesses - Kaye, Madenford, Mallis, Botlz and demand for documents - revise responses to admission demands - total time - 4.2 hours.

3.80 1,083.00

11/13/01 ALF Confer with CAP re: US objections to discovery responses, bases for objection to amended US claims, and strategy re: dealing with director's report and department practice in reporting claims without investigation.

0.70 129.50

CAP Finish deposition notices to Rosanne Brown re: reporting issues -- director's report -- U.S. amended claims; memo to Brown re: depositions, review of documents from Richard Harris; telephone call from Paul -- message re: depositions -- in Murphy if possible, on 26th; telephone call from Brown re: document production and depositions -- Larry outlined testimony of Price, Boltz and Kaye -- Kaye is on vacation -- need to reschedule, also need to subpoena Roxanne Brown -- U.S. will not challenge IDWR reporting, also Brown claims Joyce does not have any unpatented mining claims, conference with Tony re: supplemental discovery.

2.80 798.00

11/14/01 CAP Telephone call with EPE re: having her summarize title reports/do abstract - index; 2 telephone calls with Larry Brown re: scheduling of depositions on November 26th, also supplemented documents from U.S. to be used at depositions; preparation of our response, 2nd supplemental to US demands; finish review of documents re: Jump Creek sheep.

2.40 684.00

11/15/01 CAP Initial review - begin indexing - title documents from Alliance title - telephone call from Brown re: same - he did not get index from title company - also re: depositions and new documents - he will have Fred Price send; finish review/outline Bates stamped documents #3530 to #4286, related conferences with Tony.

3.50 997.50

11/16/01 MVZ Confer with Mr. Francois on discovery issues and need to respond to US discovery without revealing

JL 0148

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
December 13, 2001
Our File Number: 21381-001
Invoice Number: 13107

	Hours	
trial strategy.	0.85	242.25
EPE Telephone call with C. Pridgen and A. Francois re: status of case, discovery, and dispositive motions.	0.50	62.50
ALF Memo summarizing documents reviewed at BLM office in Idaho, confer with CAP, EPE, and MVZ re: same	4.60	851.00

CAP Conference with EPE, Tony x2 re discovery, motions by U.S. and Joyce - summary judgment; finish supplemental response to discovery by U.S.; two telephone conferences with Brown re same and copying responses - U.S. to pay; letter to Brown re responses - review documents - conference with Tony re Shea leases, Snell Homestead - check if cattle fenced,

also per Larry Brown - claims earlier response to interrogatories support U.S. claims and defeats ours - review pleadings from Harris.

11/19/01 MVZ Confer with Mr.Pridgen on new developments affecting discovery and trial schedule.

3.40	969.00
0.95	270.75

ALF Complete memo to CAP and EPE re: analysis of documents and case and preparation for summary judgment and trial, confer with CAP re: same.

5.50	1,017.50
------	----------

CAP Conference with MVZ , Tony re: Joyce discovery issues, chain of title issues, motion for summary judgment, need to amend priority dates since we can only go back to 1898; finish response to discovery from U.S.; revise same re: Fred Price of BLM -- what is US basis of US claim -- 1934; long telephone calls with Larry Brown re: stay of discovery and trial pursuant to Interior Dept. directive; telephone call with Shamenka re: potential policy changes in Dept. of Interior re: stockwater rights; conference with Samantha re: contacting U.S. archives for Patent files which are missing; conference with Tony re: prior appropriations and Joyce predecessors.

3.40	969.00
0.45	128.25

11/20/01 MVZ Update on discovery.

ALF Confer with CAP re: scheduling and discovery; complete draft, review, edit, and finalize amended notice of claim and forward information and amended claim to Mr. Nettleton for review and execution;

JL 0149

REDACTED

Joyce Livestock

Page: 4
December 13, 2001
Our File Number: 21381-001
Invoice Number: 13107

In Re SRBA, Case No. 39576

	Hours
confer with DOJ counsel re: non-opposition to motion to amend, and effect on scheduling.	1.50
	277.50

CAP Telephone call to Brown to get new trial schedule with Dolan - set for Wednesday - Brown to do motion; telephone calls to Paul Neddleton re

Telephone call with Brown re dates; telephone call with Paul re

letter from Brown re potential settlement and issues he thinks critical re motions for summary judgment - 1995 Regulations 43 LFR 4140.1 +/- re fact that T:G Act did not effect diversionary rights and easements under mining Act, also Section 3156 of Taylor Grazing Act and why Brown's conclusions re need for permit are not

2.40 684.00

REDACTED

CAP CONTINUED - supported, CAP research re Brown's position, conferences MVZ and Tony F. re same; telephone call to Clerk, Debbie Lask to set up telephone call with Dolan x 2; review FLPMA - not retroactive as argued by Brown - related research - conference with MVZ.

0.00

CAP Two telephone calls to and from Larry Brown re continuance of matters - all clients for 30 days - because of proposed U.S. policy changes - continue depositions and settlement negotiations - all clients scheduled next week - conference with MVZ re above - CAP to call Dave Barber re whether State will intervene in all cases.

0.60 171.00

SXR Phone call to National Archives for attorney Pridgen regarding land entry files and U.S. Patents.

0.25 31.25

11/21/01 ALF Complete memo to CAP/EPE re: analysis of documents and case strategy, prepare follow up discovery requests to go to United States.

2.00 370.00

CAP Review Larry Brown's motion and Order re new trial schedule - telephone call with Larry re CAP revisions to same; conference with Special Master Dolan re U.S Motion to vacate trial schedule-- Dolan reluctant that U.S. is trying to modify court schedules; subsequent letter, telephone call from Brown re new deposition dates (Call Paul re same), also re Brown's 'flawed' analysis of the Mining

JL 0150

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 5
December 13, 2001
Our File Number: 21381-001
Invoice Number: 13107

	Hours
Act, Hunter case, Public Lands Counsel vs. Babbitt etc. and U.S. claim that no statute or case requires ownership of cattle to have stockwater rights -- CAP response to all of above and CAP review cases cited by Larry plus regulations under T.G.A.	2.30 655.50
11/26/01 ALF Review executed documents received from Mr. Nettleton and co-counsel, confer with CAP re: filing and service of same.	0.20 37.00

CAP Review revised BLM motion #2 re amended claims - still defective; review Tony memo summarizing documents he reviewed and his summary of issues and missing documents needed for summary judgment -- all to avoid duplication by CAP on EDE; continue review and index Alliance Title Abstract -- title report; telephone call to David Barber -- Ass. Att. General - Idaho re State intervention in cases including Western stockgrowers and maybe Joyce attorney handling cases is Ms. Hensley; conference with MVZ re same; total time 2.8.

2.00 570.00

11/27/01 CAP Review additional documents sent by Fred Price - grazing management files and publication, continue review of title documents, compare with Tony's memo.

1.40 399.00

SXR Place follow-up phone call to John Butler with National Archives regarding certain land entry and patent files, waiting for c/b.

0.20 25.00

SXR Place follow-up phone call to Secretary of State regarding requested certified copies of limited partnership and amended & restated certificate of partnership. Waiting for c/b.

0.10 12.50

11/28/01 ALF Review motion and amended notice of claim, prepare supporting documents, and instructions to staff for filing and service (.4), follow up on receipt of corporate records from Idaho SecState (.1).

0.50 92.50

SXR Notarize Amended Notice of Late Claim.

0.20 25.00

11/29/01 CAP Telephone call with Paul

REDACTED

0.30 85.50

JL 0151

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 6
December 13, 2001
Our File Number: 21381-001
Invoice Number: 13107

Courtesy Discount

-2,760.00

For Current Services Rendered

53.05 10,611.25

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Elizabeth Ewens	0.80	\$125.00	\$100.00
Anthony L. Francois	15.00	185.00	2,775.00
Craig A. Pridgen	33.90	285.00	9,661.50
Michael J. Van Zandt	2.60	285.00	741.00
Samantha L. Hubley	0.75	125.00	93.75

Balance Due

REDACTED

JL 0152

We appreciate your prompt response. Please call if you have any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
November 13, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 10/31/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 11/13/01

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0153

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
November 13, 2001
Our File Number: 21381-001
Invoice Number: 11415

STATEMENT FOR PERIOD THROUGH 10/31/01

Previous Balance

REDACTED

Services Rendered

	Hours
10/01/01 ALF Confer with CAP re: title documents provided by DOJ.	0.10 18.50

CAP Telephone call from Larry Brown re scheduling telephone conference call with Dolan re new scheduling order in view of U.S. motion to amend claims, initial review of Basin 57 documents received from Fred Price and Larry Brown; conference with Tony re above issues and merits of vacating trial date v. continuance of same; long telephone call from Paul Nettleton

REDACTED

1.50 427.50

10/02/01 ALF Review court order re: scheduling, confer with CAP re: information from Mr. Nettleton, and confer with DOJ re: amendment to schedule and exchange of discovery and other information (1.5), initial review of grazing and title documents forwarded by DOJ (.7), confer with MVZ re: avenue's for attacking US claim on amended notice (.5).

1.70 314.50

CAP Long telephone call from Larry Brown re scheduling discovery in light of Dolan's latest revised schedule including depositions of U.S. witnesses - five in total and their expected testimony - also our potential witnesses including Mr. Lewis; two related conferences with Tony re same; document review - if packaging received this week, CAP telephone conference with Paul, and document review in Boise next week.

1.30 370.50

JL 0154

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
November 13, 2001
Our File Number: 21381-001
Invoice Number: 11415

	Hours	
10/03/01 ALF Follow up with Fred Price re: document inspection, detailed review of Shea grazing records and other documents and confer with CAP re: same, and prepare detailed memo, analyzing, summarizing and inter-relating them for use with summary judgment motion.	6.10	1,128.50
CAP Two conferences with Tony re his review of documents produced and scheduling of further document discovery next week in Boise - also he needs to coordinate with Paul and advise of Dolan's order; conference with MVZ - no charge.	0.30	85.50
10/04/01 ALF Follow up with CAP re: review of documents and outline further discovery and trial preparation necessary for case.	1.40	259.00
CAP Two conferences with Tony re additional document review from Larry Brown and Price - deposition witnesses and depositions - Tony to call Paul re Boise trip to review additional files not previously produced.	0.10	28.50
10/05/01 ALF Review amended notices of claim, legal research re: sufficiency of claims, outline and begin draft of submission to IDWR re: denial of amended claim, confer with MVZ re: same; follow up with BLM re: document review.	3.00	555.00
10/08/01 ALF Review applicable legal authorities and proceed with draft of letter to IDWR (1.1), travel to Boise for document inspection (10.0).	3.10	573.50
10/09/01 ALF Review BLM grazing records.	6.00	1,110.00
CAP Long telephone call from Larry Brown re discovery, depositions, experts, document production, title report - limited to our list of base properties and witnesses - Mr. Ryan will not testify, Bob Mallis - re existence of water in Jordan Valley and use, scheduling depositions - October 31, November 2 and 3 - Larry has four or five and Paul and Lewis - we will do experts in November, conference with Tony re supplemental document discovery.	1.20	342.00
10/10/01 MVZ Review status and schedule.	0.45	128.25
ALF Complete review of BLM grazing records (5.5), return travel from Boise (8.0).	7.50	1,387.50

JL 0155

Joyce Livestock

Page: 3
November 13, 2001
Our File Number: 21381-001
Invoice Number: 11415

In Re SRBA, Case No. 39576

	Hours	
10/11/01 ALF Follow up with CAP and MVZ re: results of document inspection, and complete list of base properties	0.50	92.50
CAP Two conferences with Tony re two telephone conferences with Larry Brown re grazing adjudication files - located in Boise; review files to date; telephone conference with National Archives re missing homestead/patent files - left message re rescheduling depositions, Larry amending witness list and documents also limiting title search to specific base properties.		
10/12/01 CAP Two telephone calls from Larry Brown, conference with Tony Francois re his position that our discovery response is incomplete, wants stipulation as to what we are relying upon for dispositive motion and trial also still missing documents from BIM - if available, Tony will fly up to review re depositions - Paul failed to appear in 1996, if he does so again Brown will object to trial testimony, scheduling depositions for October 31 - November 2nd; conference Tony re above - total time: 1.4 hours.	1.80	513.00
10/16/01 ALF Follow up on exhibits and discovery issues with CAP, prepare letter to Larry Brown re: discovery.	1.00	285.00
10/16/01 ALF Follow up on exhibits and discovery issues with CAP, prepare letter to Larry Brown re: discovery.	1.40	259.00
CAP Two telephone calls from Brown pursuant to CAP telephone call with Paul		
Brown has added Fred Price - detailed discussion of what he will testify to - also U.S. additional exhibits coming by 10/17/01; Brown needs executed verification from Paul -- also Brown will not produce exhibits at depositions because of our objections - review and begin revision to our response to discovery nos. one and two by U.S.; third telephone call from Brown re experts - to be deferred until after motions; conference with MVZ re testimony of Price - not expert - limit re grazing practices and title issues - long conference with Tony (cont'd on p. 2)		
10/17/01 WCC Attended attorney meeting regarding upcoming case matters.	1.00	285.00
CAP (con'd from p.1) re his document review to date and review summary - also what we are missing.	0.70	199.50
10/17/01 WCC Attended attorney meeting regarding upcoming case matters.	0.20	25.00

REDACTED

JL 0156

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 4
November 13, 2001
Our File Number: 21381-001
Invoice Number: 11415

	Hours
ALF Confer with EPE and CAP re: results of document inspection and supplementation of discovery responses (.1), complete letter and accompanying materials for submission to IDWR requesting denial of the United States amended claims (2.7).	1.80 333.00
CAP Conference with Tony re new discovery documents - need to revise prior responses pursuant to CAP; telephone conference with Brown; long letter to Brown re discovery issues in response to his long telephone conference on 10/16/01.	0.40 114.00
EPE Telephone conference with C. Pridgen and A. Francois re status of pending cases and discovery issues.	0.10 12.50
10/18/01 CAP Long telephone conference with Larry Brown re need for verification by Nettleton of discovery by Paul; telephone conference with Tony re same and re supplementing discovery, two telephone calls from Paul Nettleton	1.30 370.50
REDACTED	
10/19/01 CAP Two telephone conferences with Tony re objection to IDWR - re U.S. amended claims - Jordan Creek also re supplemental discovery production to Larry Brown re documents Tony obtained this week - CAP brief review of same.	0.80 228.00
10/22/01 ALF Confer with CAP re: supplementing discovery responses.	0.30 55.50
CAP Begin review of documents - pleadings from Brown re allotments and permits; telephone conference with Brown re status of title report and revise schedule of depositions.	0.80 228.00
10/23/01 ALF Confer with CAP re: information provided to IDWR to effect report on federal claim.	0.20 37.00
CAP Telephone conference with Paul	

, conference with Tony re documents and evidence of transfers from Jump Cree; begin review of box of documents from Tony's review last

JL 0157

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 5
November 13, 2001
Our File Number: 21381-001
Invoice Number: 11415

	Hours	
week - identify those which may be exhibits and to be produced in response to U.S. discovery; long telephone conference with Mr. Lewis re his testimony and Joe Snell Homestead on Jordan Creek and exhibits he may have.	2.30	655.50
10/24/01 CAP Continue review of newly received documents from BLM - 5000 plus pages, telephone conference with Brown re status of title search, supplementing discovery requests, depositions next week.	0.80	228.00
10/25/01 ALF Confer with CAP and Larry Brown re: exchange of discovery information, analysis of grazing records, and witness preparation, confer with CT Corporation service re: Idaho Sec State records for Joyce	1.00	185.00
CAP Continue review, index, mark as exhibits for production to U.S. - box of documents received from BLM; two telephone calls from Larry Brown re supplemental discovery, revised list of U.S. witnesses - this is 4th revision by U.S.; proposed testimony of Roxanne Brown, Fred Price - Larry trying to use him as an expert? - also we need all Joyce corporate records; Larry indicates Silver City and Oreana files where together now separated and renamed; conference with Tony re above - CAP to subpoena Tuthill and Roxanne Brown - review L. Brown supplemental discovery response - July 2nd; telephone call from Brown - IDWR will report out U.S. claims once verified by signature from U.S. (cont'd to p. 2)	2.00	570.00
CAP (cont'd from p. 1) conference with Tony re corporate/partnership documents missing and needed from client - particularly General Partnership Agreement around 1937-1980s.	0.50	142.50
10/26/01 ALF Confer with CAP re: analysis of documents, and follow up with SAH re: corporate records.	0.30	55.50
CAP Three telephone conference with Larry Brown re rescheduling depositions and new trial schedule; telephone to Court - conference telephone conference set with Dolan Monday per court clerk; negotiate new trial schedule with Brown, depositions week of November 26th; CAP review documents for supplementing our responses to discovery; begin brief, review documents just received from R. Harris office - chain of title and		

JL 0158

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 6
November 13, 2001
Our File Number: 21381-001
Invoice Number: 11415

Hours

grazing documents; per telephone conference with Brown - review Administrative Order 10 - re late claims - also Brown pushing for any new policy statement re Idaho cases from new administration. telephone conference with Paul Nettleton re

1.80 513.00

10/29/01 CAP Continue preparation of Amended Response to U.S.

Discovery Demands re documents admissions and interrogatories - related conference with Tony and document review; telephone call from Brown re new schedule; conference telephone conference with Brown - Dolan re new trial schedule - our joint motion, revise motion and dates - Dolan will check court availability subsequent telephone call from Larry depositions and documents also re need to subpoena Roxanne Brown.

REDACTED

1.90 541.50

10/30/01 ALF Confer with CAP re: US filing and amended director's report.

0.30 55.50

CAP Telephone call from Brown re supplemental discovery - reschedule, additional documents; CAP begin supplementing discovery responses, review two sets of documents from U.S., total 7000 plus pages; review pleadings from Brown. errata changes to Form 4 claims, still not in compliance, three supplemental responses to discovery; four notices of deposition; conference with Tony re same; telephone conferences with Harris office re stipulation; telephone conference with Paul - left message; conference with Tony re motion for summary judgment issues - dispositive motion by U.S. - review IDWR amended report on U.S. claims, also noting U.S. still has not correctly verified its claims, no comment by IDWR

1.50 427.50

10/31/01 CAP Continue review, index documents - supplementing prior discovery disclosure of documents; telephone conference with Larry Brown re additional documents re BIM fees paid in 1935 and application for permits 1933-34 - missing from U.S. documents disclosed; memo to client re status of case.

JL 0159

1.30 370.50

For Current Services Rendered

59.75 13,510.75

Timekeeper
Elizabeth Ewens

Recapitulation

Hours 0.10
Rate \$125.00

Total
\$125.00

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 7
November 13, 2001
Our File Number: 21381-001
Invoice Number: 11415

Anthony L. Francois
Craig A. Pridgen
Michael J. Van Zandt
Willis C. Conner

34.70	185.00	6,419.50
24.30	285.00	6,925.50
0.45	285.00	128.25
0.20	125.00	25.00

Balance Due

REDACTED

JL 0160

We appreciate your prompt response. Please call if you have any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936

(415) 905-0200

TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
October 12, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 09/30/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 10/12/01

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0161

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SREA, Case No. 39576

Page: 1
October 12, 2001
Our File Number: 21381-001
Invoice Number: 9585

STATEMENT FOR PERIOD THROUGH 09/30/01

Previous Balance

REDACTED

Services Rendered

Hours

09/04/01 ALF Confer with CAP re: documents from document inspection which indicate chain of title and grazing history for claims.

0.40 74.00

CAP Conference with MVZ re issues of discovery and settlement, conference Tony F. re same - demand letter was not sent because we did not receive documents from BLM - also Tony advised re his research to date on historic water rights - Cow Creek - Silver City areas which are key to settlements and discovery issues; begin review documents sent by Larry Brown - the records/pleadings from Basin 57 adjudication; also need missing chain of title re Shea.

1.40 399.00

09/05/01 CAP Long telephone call from Larry Brown re discovery issues, depositions, motion for summary judgment - told him we did not get response from him re documents - he believes we have not responded, will not continue trial again, discovery is due by end of month - he will bring motion to compel production of documents - title documents to base property we believe supports the water right - Note: Brown has found old grazing applications, does not know if they apply to Basin 51, CAP review documents sent by Brown and documented compiled by Tony.

1.00 285.00

09/06/01 CAP Long telephone call from Larry - follow up on call earlier this week re discovery - he will look further for Shea patients and deeds but wants us to establish chain - still thinks appurtenance clause is not sufficient and U.S. will claim; ownership of water right; CAP review files - documents left by

JL 0162

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
October 12, 2001
Our File Number: 21381-001
Invoice Number: 9585

Hours
1.00 285.00

Tony.

09/10/01 CAP Two conferences with Tony, MVZ re status of discovery - our responses due - two long telephone conferences with Brown re status of discovery - he will bring motion to compel discovery if no response this week - told him we are still missing files requested from U.S. - review Basin 57 documents sent - mainly pleadings and little re discovery; telephone conference with Fred Price - left message re files in Boise; review Special Master Rulings on Basin 57 which do not address ownership of stockwater by U.S.; telephone conference with Brown - Basin 57 cases - U.S. claims, ownership as issue along with priority duties from deeds; also re chain of title issues (cont'd on p. 2)

3.70 1,054.50

CAP (cont'd from p.1) U.S. may order title report - stilling patent files - CAP to check; also Larry thinks we have grazing preference files, also review files to identify base property for Silver City allotments - need records and historic use - John T. Shea.

0.05 14.25

09/12/01 MVZ Discovery issues.

0.65 185.25

ALF Confer with MVZ and CAP re: discovery and summary judgment (.5), review notes of conversations with Larry Brown re: discovery (.3), review discovery requests and prepare objections and responses to same (2.0).

2.80 518.00

CAP Meeting with MVZ, Tony re status of discovery response to U.S. discovery; long telephone conference with Paul Nettleton re

REDACTED

letter to
Brown re incomplete response to our demands; two telephone conferences with Larry re splitting costs of title report - and Larry thinks we received everything U.S. has in Boise except Homestead and patent files on Silver City, also re having us supplement requests; initial review of archive files received last year - total of 32; two conferences with Tony F. re response to U.S. discovery due this week (cont'd on p. 2)

3.45 983.25

CAP (cont'd from p. 1) attend water group meeting re

JL 0163

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
October 12, 2001
Our File Number: 21381-001
Invoice Number: 9585

	Hours	
Joyce discovery and potential motion for summary judgment.	0.05	14.25
09/13/01 ALF Confer with CAP re: discovery responses.	0.40	74.00
CAP Telephone conference with Harris office re chain of title documents in Basin 57 and stipulations - letter to Harris re same; review and revise response to U.S. discovery: interrogatories, documents, admissions; conference with Tony F. re same.		
09/14/01 CAP Long telephone conference with Larry re missing documents from U.S., doing joint chain of title - list of entities from 1865 -1985 with breakdown of individuals, partnerships and corporations, conference with Tony re same; telephone conference with Brown - deposition and witnesses - tentatively set for October 15-18 in Boise; finish review and outline of patent files from Archives - missing six - identify all Home Ranch and Shea base properties - conference with Tony re same.	1.00	285.00
09/17/01 ALF Review CAP remarks on discovery responses, revise and edit same, and forward draft to US counsel.	3.20	912.00
CAP Finish review archive documents, telephone conferences to Butler at Archives re missing documents - left message, conference Tony re same, telephone conference Brown re same and supplementing documents from Brown and Fred Price.	0.80	148.00
09/18/01 ALF Follow up with CAP re: responses to US discovery, and prepare review format and letter for client.	1.00	285.00
CAP Telephone call from Larry re our response to discovery - thinks we still not giving all we have - told him we and still looking for documents and believe it is U.S. which has not responded on all files involving Silver City/Cow Creek; conference with Tony re same.	0.20	37.00
09/19/01 ALF Confer with CAP re: identification of witnesses.	0.30	85.50
CAP Two telephone conferences with Larry Brown, telephone conference with Fred Price re patent documents - phone numbers and Archives and what files, Price has to supplement missing files, also re witnesses Larry wants to call and deposition	0.20	37.00

JL 0164

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 4
October 12, 2001
Our File Number: 21381-001
Invoice Number: 9585

Hours

schedules; review fax from client, conference with Tony re above also re supplementing our discovery demands - if we had all documents from Basin 57, we could save time - Brown will look again - conference with Tony re Shea - Larry sent what he has as page nos. 214-300 and patients page nos. 1361-1405 - review same.

09/20/01 ALF Prepare list of base properties for US title search.	1.20	342.00
	0.60	111.00

CAP Two telephone conferences with Larry Brown - U.S. Archives moved, new number is at College Park - CAP called - left messages re missing files, also depositions in Boise - Larry will disclose all witnesses next week - probably 6 or 7, Larry wants our witnesses names by discovery cut-off - October 1, also re final list of all properties to do title search - Larry will check his files again from Basin 57 litigation - also Brown's witnesses will support his theories that if U.S. does not own water it cannot issue grazing permits - conference with Tony re above; review fax documents from Fred Price, Larry Brown.

1.80 513.00

09/21/01 CAP Telephone call - left message for Mr. Butler at National Archives - fact specific to missing files; long letter - memo to Paul Nettleton

REDACTED

identification of grazing files we need to review - especially in John T. Shea chain of title.

1.40 399.00

09/22/01 ALF Complete base property catalog and identify relevant entry files.

0.70 129.50

09/24/01 ALF Confer with CAP and review documents related to Joyce chain of title (.3), review CAP letter to Mr. Nettleton (.1), telephone conference with Paul Nettleton
outline draft supplemental discovery response based upon conversation with Paul Nettleton (.3).

1.00 185.00

CAP Long telephone conference with Paul re chain
produced in Basin 57 - Larry should have -

JL 0165

Joyce Livestock

Page: 5
October 12, 2001
Our File Number: 21381-001
Invoice Number: 9585

In Re SRBA, Case No. 39576

Hours

telephone conference with Larry Brown re same -
need to avoid duplication also re stipulation of
facts and title, review stipulations in Basin 57 -
also Paul available October 7th and 9th, also
discussed CAP letter re discovery and legal issues
- conference with Tony re same.

1.20 342.00

09/25/01 CAP Three telephone calls from Larry - chain of title
documents never introduced in Basin 57 - all by
stipulation - and not based upon appurtenance
clauses in deeds; second telephone call from Larry.
- three conferences with Tony: stipulation on this
case - chain of title from Basin 57, Larry has
found documents - BLM reports - we did not
designate in discovery - he will use - is sending
also he needs deeds to partnership - show title in
Joyce Ltd. partnership and partnership documents
listing gall base properties; also re dependent
property survey from U.S. - matches but other
property tested tied to Silver City allotment also
re person doing title search at Alliance Title;
(cont'd on p. 2)

0.90 256.50

CAP (con'd from p. 1) also Brown has found Attorney
Fritz file from Basin 57 - will copy and send but
missing transfers between spouses - also Fred
sending supplemental response - all documents Larry
will reply upon - also Larry will check to see if
title company search done - Basin 57 - two
conferences with Tony re above - and need for deed
and contract(s) to current Joyce partnership.

0.20 57.00

09/26/01 ALF Review documents forwarded by DOJ, and telephone
call to DOJ re: nature of same, letter to DOJ
confirming identity of potential witnesses.

0.50 92.50

CAP Telephone call from Brown re exhibits - 2000 BLM
report and reliance to case - it simply discusses
range management - conference with Tony re same.

0.30 85.50

SXR Meeting with MVZ & CAP regarding chain of title
documents.

0.20 25.00

09/27/01 ALF Confer with CAP and review GIS maps provided by
BLM, and DOJ proposal for cost-sharing on title
search.

0.20 37.00

CAP Two telephone calls from Larry Brown re Alliance
title search and costs - too much - review sections

JL 0166

Joyce Livestock

Page: 6
October 12, 2001
Our File Number: 21381-001
Invoice Number: 9585

In Re SRBA, Case No. 39576

Hours

he wants covered - conference with Tony re same -
we only need about 16 properties - not 62 parcels -
we should defer decision until we get supplemental
documents from Fred Price - conference Tony re same
- telephone conference with Larry - we may have to
delay discovery cut-off because U.S. still owes us
documents and too much expense is being incurred by
our doing U.S. work - total time .9 hours.

0.50 142.50

09/28/01 ALF Confer with CAP and DOJ re: US motion to file
amended notice of claim, and discovery issues.

0.20 37.00

CAP Several telephone conferences from Brown - also
reviewed fax of U.S. motion to file amended claims
- 36 pages - Brown had area GPS and found points
not covered by U.S. claims - he wants to continue
trial - also he wants stipulation on what is all of
base property supporting our allotments, also re
discovery, his motion, new scheduling conference
with Dolan; telephone conference with Brown - we
will agree to new schedule - conferences with Tony
re same - total time - 2.6 hours.

2.10 598.50

For Current Services Rendered

34.60 9,029.00

Timekeeper	Recapitulation	
	Hours	Rate
Anthony L. Francois	8.00	\$185.00
Craig A. Pridgen	25.75	285.00
Michael J. Van Zandt	0.65	285.00
Samantha L. Roetzer	0.20	125.00
		Total
		\$1,480.00
		7,338.75
		185.25
		25.00

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 7
October 12, 2001
Our File Number: 21381-001
Invoice Number: 9585

Balance Due

REDACTED

JL 0168

We appreciate your prompt response. Please call if you have any questions regarding this statement.

McQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
September 10, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 08/31/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 09/10/01

21381-001 In Re SRBA, Case No. 39576

Balance

REDACTED

JL 0169

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
September 10, 2001
Our File Number: 21381-001
Invoice Number: 8358

STATEMENT FOR PERIOD THROUGH 08/31/01

Previous Balance

REDACTED

Services Rendered

	Hours
08/01/01 CAP Attend attorney meeting - water meeting; telephone conference with Brown re status of continuation of trial/discovery.	0.30 85.50
08/16/01 CAP Conference with Tony and Ladd Bedford re status of discovery - we need to subpoena IDWR State License files - why is U.S. filing for licenses rather than ranchers? Also need to file objections to Director's Reports; review objections by U.S. attached to claims; telephone conference with Larry Brown re production of documents from 1996-97 litigation on Joyce - should have for me next week.	0.60 171.00
For Current Services Rendered	0.90 256.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Craig A. Pridgen	0.90	\$285.00	\$256.50

Balance Due

REDACTED

We appreciate your prompt response. Please call if you have any questions regarding this statement.

JL 0170

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
September 04, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 07/31/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 09/04/01

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

JL 0171

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
September 04, 2001
Our File Number: 21381-001
Invoice Number: 7593

STATEMENT FOR PERIOD THROUGH 07/31/01

Previous Balance

REDACTED

Services Rendered

Hours

07/02/01 ALF Review Larry Brown memo re: status of discovery
(.1), confer with LDB and MVZ re: same, and review
file for information on priority date awarded in
other claims (.5), confer with Larry Brown re:
status of same (.1), review documents produced in
discovery to identify origin of Jordan Creek claim
(4.0), prepare letter to Larry Brown requesting
settlement and supporting documentation for MVZ
review and confer with MVZ re: same (.7).

5.40 999.00

07/03/01 ALF Complete review of documents produced in discovery
by United States (.75).

0.75 138.75

07/11/01 ALF Revise settlement letter per MVZ comments.

0.30 55.50

CAP Conference with MVZ - EAE, Tony re delay in trial
to allow time for ruling on LU; CAP telephone
conference with Brown re same - motions due next
week, also wants discovery from us - told him we
may need to ask for continuance - he will agree but
Dolan may not; conference with Tony re status of
discovery.

0.60 171.00

07/12/01 ALF Confer with CAP and Larry Brown re: terms of
settlement of claims.

0.30 55.50

CAP Two telephone conferences to and from Larry Brown
re settlement - will allow same priority date as
Basin 47 - 1985 - not available - says Joyce
incorporated 1893?; telephone conference with EAE
to cross check U.S. claims - back in from defaults
to U.S. to Director's Reports to first claims filed
by clients - impacts defaults.

JL 0172

0.80 228.00

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
September 04, 2001
Our File Number: 21381-001
Invoice Number: 7593

07/13/01 ALF Message to Paul Nettleton re: REDACTED

Hours 0.20 37.00

07/16/01 ALF Review message from Paul Nettleton and follow up with MVZ, CAP.

Hours 0.10 18.50

CAP Telephone call from Brown - he wants extra time to continue dispositive motions - wants us to identify witnesses for depositions and still waiting for documents from Tony re showing earlier priority date from Taylor Grazing adjudication records; telephone call to Special Master Dolan re hearing on rescheduling order - left message - will call Wednesday - CAP to draft new trial schedule; telephone conference with Tony F. re documents for Brown.

Hours 0.70 199.50

07/18/01 CAP Water meeting re continuance of trial - first continuance, was not a stay - Brown will agree - Dolan may not - MVZ will call Paul Nettleton.

Hours 0.20 57.00

JHV Meeting with Attorneys Van Zandt, Pridgen and Francois

Hours 0.15 18.75

07/19/01 ALF Confer with MVZ re: status of case and analysis of documents demonstrating pre-1934 use of Jordan Creek water rights.

Hours 0.40 74.00

CAP Conference with MVZ re briefing for trial - also potential summary judgment, trial preparation, discovery - what client will authorize - MVZ to verify - all if we cannot get continuance of trial - telephone conference with Brown re same - will do stipulation next week.

Hours 0.60 171.00

07/20/01 ALF Confer with MVZ re: scope of discovery and subsequent dispositive motion.

Hours 0.10 18.50

CAP Long telephone conference with Larry re scheduling - joint motions - basis for motion, review SRBA Rules per MVZ - advised Larry of grazing adjudication - references 1929 and 40 years prior re beneficial use - we will send documentation - conference with Tony re same - settlement 55-10135, 3 BA claims, 1998 Joyce filed late claims - U.S. will make same settlement as Basin 57 - not acceptable, also re need for response to discovery request no. 2 - conference with Tony re same - re Basin 57 - Larry does not know why priority was set

JL 0173

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 3
September 04, 2001
Our File Number: 21381-001
Invoice Number: 7593

Hours

in 1985 - maybe break in chain of title, terms of stipulation from Larry re continuance - wants discovery but will wait for IU decision, (cont'd on p. 2)

1.80 513.00

CAP (cont'd from p. 1) conference with MVZ re above - review file - second telephone conference with Brown re Joyce had prior use to 1929 with Sheas and others after 34 acquired preference rights from others - conference with MVZ,

third telephone conference from Brown - he wants to limit discover to that needed for summary judgment - also stipulate to disputed facts.

0.10 28.50

07/23/01 ALF Confer with CAP re: revisions to scheduling and theories and evidence to be used for summary judgment motion (.6), review and select documents to serve as basis for summary judgment motion (2.9).

3.50 647.50

CAP Telephone calls to and from L. Brown re CAP draft of motion for extension of trial date - scheduling order - CAP revise same and prepare declarations - revise and fax documents plus CAP declarations - Larry to revise - telephone conference with Dolan for Tuesday or Wednesday to be set up by Brown; telephone conference with Ampe to advise of motion - not in - latter learned he has left Idaho.

1.30 370.50

07/24/01 CAP Two long telephone conferences with Larry Brown - he agrees to review all of U.S. discovery files on Basin 57 litigation and produce by August 24th including chain of title responses to discovery - Joyce response to requests for admissions up through challenge to District Court and documents which led to 1985 date - Larry thinks we may be estopped from asserting earlier priority date but Judge Woods' decision in LU may have changed this - I think; sign and fax motion to continue with CAP declaration; long conference telephone call with Dolan and Larry continuance granted new trial January 2002.

1.20 342.00

07/25/01 ALF Confer with CAP re: amendment of scheduling order, documents to be produced by United States, identification of documents for summary judgment motion and responses to US discovery requests,

JL 0174

REDACTED

Joyce Livestock

Page: 4
September 04, 2001
Our File Number: 21381-001
Invoice Number: 7593

In Re SRBA, Case No. 39576

	Hours
research re: current SRBA decisions relevant to stockwater claims.	0.30 55.50
CAP Water meeting: Confer re amendment of scheduling order, documents to be produced by United States, identification of documents for summary judgment motion and responses to U.S. discovery requests.	0.20 57.00

CAP Telephone conference with Paul re

REDACTED

0.40 114.00

SXR Confer regarding amendment of scheduling order, documents to be produced by United States, identification of documents for summary judgment motion and responses to U.S. discovery request.

0.20 25.00

EPE Confer re: amendment of scheduling order, documents to be produced by United States, identification of documents for summary judgment motion and responses to U.S. discovery requests.

0.20 25.00

For Current Services Rendered

19.80 4,420.00

Timekeeper	Recapitulation	
	Hours	Rate
Elizabeth Ewens	0.20	\$125.00
Anthony L. Francois	11.35	185.00
Craig A. Pridgen	7.90	285.00
James Vorhis	0.15	125.00
Samantha L. Roetzer	0.20	125.00
		Total
		\$25.00
		2,099.75
		2,251.50
		18.75
		25.00

Joyce Livestock

In Re SRBA, Case No. 39576

Balance Due

Page: 5
September 04, 2001
Our File Number: 21381-001
Invoice Number: 7593

REDACTED

JL 0176

We appreciate your prompt response. Please call if you have any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN Z. DT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

BALANCE INCLUDES CURRENT WORK THROUGH 06/30/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 07/12/01

21381-001 In Re SRBA, Case No. 39576

Balance

Page: 1
July 12, 2001
Our File Number: 21381

REDACTED

JL 0177

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
July 12, 2001
Our File Number: 21381-001
Invoice Number: 5200

STATEMENT FOR PERIOD THROUGH 06/30/01

Previous Balance

REDACTED

Services Rendered

	Hours
06/05/01 ALF Review MVZ instructions re: discovery responses.	0.10 18.50
06/06/01 JHV Preparation for and conference call with with Attorneys Van Zandt, Pridgen, Francois, Ewens and Samantha Roetzer.	0.20 25.00
SXR Meeting with Attorneys and paralegal regarding scheduling and time line of assignments.	0.25 31.25
06/12/01 ALF Review calendar and follow up on scheduling matters (.1)	0.10 18.50
For Current Services Rendered	0.65 93.25

Recapitulation

<u>Timekeeper</u>	Hours	Rate	Total
Anthony L. Francois	0.20	\$185.00	\$37.00
James Vorhis	0.20	125.00	25.00
Samantha L. Roetzer	0.25	125.00	31.25

Balance Due

REDACTED

We appreciate your prompt response. Please call if you have any questions regarding this statement.

JL 0178

McQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID No: 94-3244361

Page: 1
June 15, 2001
Our File Number: 21381

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

BALANCE INCLUDES CURRENT WORK THROUGH 05/31/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 06/15/01

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
June 15, 2001
Our File Number: 21381-001
Invoice Number: 4154

STATEMENT FOR PERIOD THROUGH 05/31/01

Previous Balance

REDACTED

Services Rendered

	Hours	
05/17/01 CAP Long telephone call from Larry Brown - he wants to begin discovery - will send new demands and requests for admissions - conference with Tony re same - we need to contact client.	0.40	114.00
05/18/01 CAP Follow-up telephone call from Larry Brown re discovery and witness identification - wants discovery by end of June - told him again we do not know status of clients' positions.	0.30	85.50
05/21/01 ALF Confer with CAP and MVZ re: proceedings to be handled for case.	0.20	37.00
05/24/01 CAP Long telephone call from Larry Brown - additional discovery being mailed - will settle if Nettleton will accept same priority date as previously agreed to - said we have no authority for this but would talk to client - but U.S. wants Joyce to drop objections to U.S. claims 55-11061, 11385, 12452; we need to do 2nd set of discovery on these issues and for documents; related conference with Tony Francois.	1.50	427.50
05/25/01 CAP Telephone call from Larry Brown re discovery issues - he wants responses in June, review new discovery received from Brown; second telephone call from Brow - he will be in Boise June 4-14 if we can schedule document production and depositions; letter to Brown re above.	0.30	85.50

REDACTED

05/29/01 CAP Long telephone conference with Tony and MVZ

Tony or MVZ to call

JL 0180

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
June 15, 2001
Our File Number: 21381-001
Invoice Number: 4154

clients.

Hours
0.50
142.50

3.20
892.00

For Current Services Rendered

Recapitulation

Timekeeper

Anthony L. Francois
Craig A. Pridgen

Hours
0.20
3.00

Rate
\$185.00
285.00

Total
\$37.00
855.00

Balance Due

REDACTED

JL 0181

We appreciate your prompt response. Please call if you have any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
May 22, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 04/30/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 05/22/01

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH 04/30/01

Page: 1
May 22, 2001
Our File Number: 21381-001
Invoice Number: 3175

Previous Balance

REDACTED

Services Rendered

	Hours	
04/02/01 CAP Telephone conference with Larry Brown and conference telephone conference with Special Master Dolan re need to file 706 report by IDWR 90 days before hearings on cases.	0.40	114.00
04/10/01 CAP Long telephone conference with Larry Brown re prior response to discovery by Harris and Larry wants to finish discovery and supplement same despite continuation of trial - told him we need to continue discovery for economic reasons and also because of pending rulings on LU which may lead to settlement; conference with Tony re same.	0.90	256.50
04/11/01 ALF Telephone conference with Larry Brown re: discovery issues and potential settlement framework.	0.30	55.50
CAP Telephone conference with Brown re prior discovery responses he will look for what he got from Harris, also wants to review answers to interrogatories re mining claims and he will check witness list re trial - re claims 10135, 11385, 11482; telephone conference with Special Master Dolan - trial schedule continued - discovery due July 2, trial October 3; subsequent telephone conference with Brown - he will call after my trial - second week of May, related conference with Tony F. re discovery; telephone call from Brown will settle along same lines as basin 57 claims and keep U.S. claims on track for trial; conference with MVZ re same.	1.80	513.00
For Current Services Rendered	3.40	939.00

Joyce Livestock

Page: 2
May 22, 2001
Our File Number: 21381-001
Invoice Number: 3175

In Re SREA, Case No. 39576

Recapitulation		
Timekeeper	Hours	Rate
Anthony L. Francois	0.30	\$185.00
Craig A. Pridgen	3.10	285.00
		Total
		\$55.50
		883.50

Balance Due

REDACTED

JL 0184

We appreciate your prompt response. Please call if you have any questions regarding this statement.

McQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200

TAX ID No: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
April 09, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 03/31/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 04/09/01

Balance

21381-001 In Re SRBA, Case No. 39576

REDACTED

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
April 09, 2001
Our File Number: 21381-001
Invoice Number: 785

STATEMENT FOR PERIOD THROUGH 03/31/01

Previous Balance

REDACTED

Services Rendered

Hours

03/07/01 CAP Pre-hearing telephone call with Larry Brown re: joint motion to continue trial date and position of US on 55-11061, 11385 and 12452 00 U.S. claims and Larry thinks they can be resolved by summary judgment re: does U.S. own Stockwater by appropriation; also re: Hewlett?? objection -- season of use and scheduling issues; attend long hearing via phone on motion with S.M. Dolan -- initially he did not want to continue trial -- they are trying to move cases -- finally continued to 10/31/01 -- set other pretrial and discovery dates (1 of 2)

1.00 285.00

CAP Post-hearing telephone conference with L. Brown re: getting 706 report for future trials -- this is detail of what IDWR investigated to render director's report, conference with MVZ and Tony re: above (2 of 2).

0.80 228.00

CAP Post-hearing (Joyce trial setting) hearing -- conference telephone call with S.M. Dolan, Brown, Candice, Price, etc., all re: policies of court since Burdeck took over and from L. Brown re: Bush 'Transition Teams' at Justice and BLM -- also Interior sending a team to work with Idaho and IDWR -- but too early to tell if policy changes are forthcoming.

JL 0186

0.30	85.50
2.10	598.50

For Current Services Rendered

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Craig A. Pridgen	2.10	\$285.00
		<u>Total</u>
		\$598.50

Joyce Livestock

In Re SRBA, Case No. 39576

Page: 2
April 09, 2001
Our File Number: 21381-001
Invoice Number: 785

Balance Due

REDACTED

JL 0187

We appreciate your prompt response. Please call if you have any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP
221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Page: 1
March 12, 2001
Our File Number: 21381

BALANCE INCLUDES CURRENT WORK THROUGH 02/28/01,
PRIOR BALANCES, AND PAYMENTS THROUGH 03/12/01

21381-001 In Re SRBA, Case No. 39576

Balance

REDACTED

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221 MAIN STREET, SIXTEENTH FLOOR
SAN FRANCISCO, CALIFORNIA 94105-1936
(415) 905-0200
TAX ID NO: 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

In Re SRBA, Case No. 39576

Page: 1
March 12, 2001
Our File Number: 21381-001
Invoice Number: 91

STATEMENT FOR PERIOD THROUGH 02/28/01

Previous Balance

REDACTED

Services Rendered

	Hours	
01/03/01 ALF Prepare opposition to motion to vacate and coordinate filing and service.	0.60	111.00
01/04/01 ALF Letter to Paul Nettleton re:	0.40	74.00
01/09/01 ALF Confer with CAP re: vacation of trial date in pending claims.	0.10	18.50
01/29/01 ALF Confer with CAP and Larry Brown re: vacation of trial date and motion for same.	0.20	37.00
02/01/01 CAP Letter to Special Master Dolan re continuance of trial - revise related motion and pleadings; telephone conference with Larry Brown re same.	0.40	108.00
02/02/01 ALF Review US Alternative Motion to continue dispositive motion deadline and confer with CAP re: same.	0.20	37.00
CAP Telephone call from Larry Brown re need to continue motions for summary judgment - dispositive motions.	0.30	81.00
02/06/01 ALF Confer with MVZ and CAP re: status of vacation of trial date and alternative motion for extension of dispositive briefing deadline by US (.1).	0.10	18.50
02/12/01 MVZ Review scheduling order from court.	0.35	99.75
For Current Services Rendered	2.65	584.75

JL 0189

Recapitulation

Timekeeper	Hours	Rate	Total
Anthony L. Francois	1.60	\$185.00	\$296.00

Joyce Livestock

Page: 2
March 12, 2001
Our File Number: 21381-001
Invoice Number: 91

In Re SRBA, Case No. 39576

Craig A. Pridgen
Michael J. Van Zandt

0.70 270.00 189.00
0.35 285.00 99.75

Balance Due

REDACTED

JL 0190

We appreciate your prompt response. Please call if you have
any questions regarding this statement.

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

221 Main Street, 16th Floor
San Francisco, California 94105
(415) 905-0200

Federal Identification No. 94-3244361

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

February 7, 2001

Our File Number: 21381-001/MVZ1
Invoice Number 18905

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH JANUARY 31, 2001

Balance Forward
Total for Professional Services
Total Advanced Costs
Total Current Fees and Costs
Total Payments and Adjustments
Total Amount Due

REDACTED

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 2

February 7, 2001

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 18905

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
12/05/00 CAP1	Two telephone conferences with Larry Brown re staying all clients cases, and completion of discovery.	0.60	171.00
12/11/00 CAP1	Conference with Larry Brown - he has been instructed to file motions to vacate all trial dates and bring a motion to consolidate cases with Western Stockgrowers or stay cases until after that case goes to trial - we will oppose except Joyce which we agree to continue trial date but not tied to Western Stockgrowers.	0.15	42.75
12/11/00 CAP1	Conference with Larry Brown - he thinks Court has already denied Paul's motion to set aside defaults and/or to file late claims actually only to file late claims - I think - but need to check - also thinks Paul has joined Western Stockgrowers - I don't think so at least as to trial.	0.40	114.00
12/22/00 CAP1	Review four U.S. motions to vacate trial dates in LU and Joyce to stay all cases until after trial of Western Stockgrowers		

JL 0192

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 3

February 7, 2001

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 18905

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
01/03/01 CAP1	or to consolidate them with that case, conference with Tony re same, telephone conference with Brown re same and if we should request expedited hearings - also fact that all U.S. is doing is trying to make Western Stockgrowers the law of the case. Prepare for hearing at 9:30 a.m. re motions of U.S. to stay or vacate; review and revise our responses prepared by Tony F.; related conferences with Tony F.; attempts to get copy of ruling re Western Stockgrowers motion to consolidate and stay - not on line by 5:00 p.m.	0.90	256.50
01/04/01 CAP1	Initial review of copy of Burdick's ruling on Joint Motion to make Western Stockgrowers case consolidated - they lost motion but not reviewed in detail prior to hearing at 9:30 a.m.; conference with MVZ re same; attend hearing by telephone re U.S.-Brown motions to vacate trial dates - motions denied - Larry had not read ruling on Western Stockgrowers;	1.15	327.75

JL 0193

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 4

February 7, 2001

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 18905

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
01/05/01 CAP1	finish review of Burdick's ruling - dictation re sending to clients. Telephone conference from Norm Schemanko re Burdick's ruling and how it affects all cases and how LU and particularly Joyce who objected to 7,500 U.S. claims may be able to settle by trading objections for U.S. withdrawal of their claims on Joyce/LU.	1.15	327.75
01/23/01 CAP1	Return telephone call to Paul re	0.25	71.25
01/26/01 CAP1	Long telephone call from L. Brown re terms of Joint Motion to vacate trial date which CAP will draft Monday.	0.30	85.50
01/29/01 CAP1	Begin preparation of joint motion to vacate and points and authorities - limited related research - finish motion and points and authorities.	0.50	142.50
01/30/01 CAP1	Finish Joint Motion to Vacate, prepare order, CAP declaration, revise same; telephone	2.10	598.50

REDACTED

JL 0194

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 5

February 7, 2001

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 18905

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
01/31/01	CAP1 Telephone call from Brown re motion to vacate - he at first did not want it to be Joint - but then agreed dictation re sending to Harris and Court and Paul.	1.80	513.00
		0.60	171.00
	Total for Professional Services	9.90	\$2,821.50

Summary	Hours	Rate	Total
Craig A. Pridgen	9.90	285.00	2,821.50

JL 0195

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 6

February 7, 2001

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 18905

Matter Title: In Re SRBA, Case No. 39576

REDACTED

JL 0196

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 Main Street, 16th Floor
San Francisco, California 94105
(415) 905-0200
Federal Identification No. 94-3244361

December 11, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH NOVEMBER 30, 2000

Balance Forward	
Total for Professional Services	
Total Advanced Costs	---
Total Current Fees and Costs	---
Total Amount Due	

REDACTED

MCQUAD, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 2

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
10/16/00 EPE1	Continue review of SRBA cases/Idaho Supreme Court decisions and briefing same.	0.70	87.50
10/18/00 EPE1	Continue briefing SRBA and Supreme Court decisions.	0.90	112.50
10/20/00 EPE1	Telephone call with V. Dant re: subcase numbers; telephone call with C. Pridgen re: same; research SRBA stockwater cases.	0.30	37.50
10/22/00 EPE1	Draft memos re: SRBA cases involving U.S. and federal reserved water rights.	0.20	25.00
10/23/00 EPE1	Continue researching Idaho Supreme Court decisions involving U.S. as party.	0.20	25.00
10/25/00 EPE1	Research status fo claims and prior proceedings; telephone call with IDWR and C. Pridgen re: accessing information involving competing claims.	0.60	75.00
10/27/00 EPE1	Review SRBA subcase summaries; draft memo re: reported case status and counsel of record; telephone call with T. Francois re: same.	0.80	100.00
10/30/00 EPE1	Continue review of SRBA		

JL 0198

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 3

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
11/01/00 CAP1	subcase summaries; check firm subcase numbers against SRBA master list; draft memo re: same. Review research memos, case summaries, cases re SRBA and Supreme Court cases sent by Elizabeth Ewens, telephone conference with E. Ewens re Supreme Court cases and issues; we need to find if there are any cases in SRBA or Supreme Court.	1.00	125.00
11/01/00 EPE1	Continue review of SRBA summaries re: substantive information presented to court prior to firm's entry of appearance.	0.65	185.25
11/02/00 CAP1	Conference with MVZ re status of Idaho cases, pending hearings and document production; telephone call with Mrs. Nedleton re meeting at convention; long telephone call with Larry Brown re completing discovery of documents in L.U. and Joyce when CAP in Boise and documents we still need.	0.50	62.50
11/02/00 MVZ1	Follow up on inspection of documents by Mr. Pridgen; status of discovery; issues to be	0.60	171.00

JL 0199

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 4

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
11/03/00 CAP1	resolved in litigation.	0.45	128.25
	Review patient files received from National Archives.	1.20	342.00
11/03/00 CAP1	Limited research on issue of drafting legislation for Idaho re recusing Supreme Court Judges.	0.30	85.50
11/03/00 EPE1	Research statutory and case law basis for recusal of Supreme Court Justice; telephone call with C. Bridgen re same; continue to review and brief cases affecting SRBA litigation (ID Supreme Court, US a party).	1.30	162.50
11/06/00 CAP1	Telephone call with Paul Neddelton.	0.20	57.00
11/06/00 EPE1	Continue SRBA research and memos (Idaho Supreme Court; U.S. a party); draft letter to D. Smith (IDWR) re requested SRBA/Stockwater decision; research subsequent histories fo requested cases.	1.10	137.50
11/08/00 CAP1	Research re brief in opposition to motion to consolidate and stay, begin brief.	0.70	199.50

REDACTED

JL 0200

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 5

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
11/08/00 EPE1	Telephone call with Margarita re identifying documents, pre-dating firm's entry of appearance not already incorporated in firm's files; telephone call with C. Pridgen re same; draft memo to C. Pridgen and M. Van Zandt re same; continue SRBA research and memos (Idaho Supreme Court, U.S. a party).	0.70	87.50
11/09/00 EPE1	Continue SRBA research and memos (Federal reserved water rights -- Idaho Supreme Court).	0.20	25.00
11/10/00 CAP1	Limited additional research re response and opposition to motion to consolidate and stay cases; finish draft of brief; telephone conference with Elizabeth Ewens re her research and memo re issues on prior cases and opinions re basin wide designation attempts; review cases from E.A. Ewens re same.	0.80	228.00
11/10/00 EPE1	Draft letter requesting motions, notices, orders and discovery filed prior to firm's entry of appearance.	0.60	75.00
11/11/00 EPE1	Research "test case" and "law of the case"		

JL 0201

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 6

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
11/12/00 EPE1	interpretation under Idaho law. Continue research of "test case" and "law of the case"; begin drafting memo to C. Pridgen and M. Van Zandt re same.	0.30	37.50
11/13/00 CAP1	Review additional cases and memo from Elizabeth re Supreme Court cases which may affect our Opposition to Motion to Consolidate Cases; revise Response to Motion to Consolidate and Stay; prepare CAP Declaration in support of Responsive Brief.	0.60	75.00
11/13/00 CAP1	Telephone conference with Larry Brown re document production Wednesday-Friday and files which will be available - some files are at National Archives.	0.80	228.00
11/13/00 EPE1	Continue researching "test cases" and "law of the case" and drafting memorandum and argument re same; draft letter to D. Smith (IDWR) re request for motions, notices, orders and discovery filed in subcases prior to firm's entry of appearance.	0.30	85.50
		1.10	137.50

JL 0202

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 7

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
11/14/00 MVZ1	Review memorandums from Ms. Ewens regarding motion to consolidate and law of the case in Idaho; confer with Mr. Pridgen.	0.45	128.25
11/15/00 EPE1	Continue review of subcase histories and drafting letter to IDWR requesting documents filed prior to firm's entry of appearance.	0.60	75.00
11/16/00 CAP1	Conference with Paul re		

REDACTED

11/16/00 ALF1	Confer with staff re: follow up on opposition to consolidation in Western Stockgrowers cases.	0.50	142.50
11/17/00 CAP1	Conference with Roxanne Brown re U.S. competing claims and defaults - she will try but map Paul sent is not accurate re locations of allotment boundaries.	0.10	18.50
11/17/00 EPE1	Complete review of subcase summaries and requests to IDWR for	0.50	142.50

JL 0203

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 8

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
11/20/00 EPE1	substantive documents filed prior to firm's entry of appearance; telephone call with D. Smith re progress on assignments; review information provided by T. Francois re clients' claims and competing BLM claims.	0.80	100.00
	Continue SRBA research and memoranda (Idaho Supreme Court, U.S. a party); draft memo to C. Bridgen and M. Van Zandt re documents requested from IDWR; telephone conference with D. Smith re status of same.	0.90	112.50
11/22/00 EPE1	Review and revise requests for documents (letter to D. Smith).	0.30	37.50
11/26/00 EPE1	Create database of briefed SRBA cases.	0.20	25.00
11/27/00 CAP1	Review decisions of Superior Court Idaho re reserved - wilderness stockwater, rights from E.P. Ewens and related memos.	0.45	128.25
11/27/00 EPE1	Continue research and drafting memoranda re SRBA case law (Idaho Supreme Court cases).	0.70	87.50

JL 0204

MCQUAD, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 9

December 11, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17929

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
11/29/00	EPE1 Continue research and drafting memoranda re: SRBA case law (Idaho Supreme Court and stockwater cases); begin review of documents provided by IDWR.	0.90	112.50
11/30/00	CAP1 Long telephone call from attorney Hofsteadler re joining in our opposition to "test" cases and fact her clients may join in that effort - she had questions on my brief.	0.15	42.75
Total for Professional Services		23.65	\$4,250.25

Summary	Hours	Rate	Total
Michael J. Van Zandt	0.90	285.00	256.50
Craig A. Pridgen	7.15	285.00	2,037.75
Anthony L. Francois	0.10	185.00	18.50
Elizabeth Ewens	15.50	125.00	1,937.50

JL 0205

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

221 Main Street, 16th Floor
San Francisco, California 94105

(415) 905-0200

Federal Identification No. 94-3244361

November 7, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH OCTOBER 31, 2000

Balance Forward	---
Total for Professional Services	---
Total Advanced Costs	---
Total Current Fees and Costs	---
Total Amount Due	---

REDACTED

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 2

November 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
09/20/00 EPE1	Continue researching and briefing Idaho Supreme Court cases relating to the SRBA.	0.90	112.50
09/21/00 EPE1	Conversation with Mr. Van Zandt regarding SRBA litigation.	0.80	100.00
09/29/00 EPE1	Continue research on basis for motion to designate Basin wide issue on due process issues and related motion for attorneys fees.	0.50	62.50
10/02/00 CAP1	Conference with MVZ re		

telephone call
with Haige's assistant x
2 re same; conference
with MVZ re

REDACTED

10/02/00 MVZ1	Scheduling issues for status conference on October 30 with Mr. Pridgen.	0.50	142.50
10/02/00 EPE1	Begin drafting memo regarding motion to designate Basin wide issue, continue research relevant to same;	0.35	99.75

JL 0207

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 3

November 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
10/03/00 CAP1	continue briefing cases relevant to same. Telephone call with paralegal Elizabeth Evans re lists of all subcases we now have, all clients, review briefs on Basin Wide issues, telephone call with Elizabeth re same, conference with MVZ and Tony F re Lull, Joyce and Brackett cases and pending hearings, effect of motion to consolidate -- Shamanko, and telephone calls of this date with Larry Brown re all cases and motions; 2nd telephone call with Elizabeth re same and priorities for her research assignments and she should call MVZ.	1.10	137.50
10/03/00 MVZ1	Long discussion with Mr. Pridgen regarding schedule for discovery and trials in cases; need to go to Boise for document inspection and need to designate new local counsel.	0.50	142.50
10/03/00 ALF1	Confer with CAP and MVZ re: status of discovery and follow up.	0.65	185.25
10/04/00 CAP1	Three telephone calls with Ed Evans -- paralegal working on	0.20	37.00

JL 0208

MCQUAID, METZLER, BELFORD & VAN ZANDT ^{LLP}

Page 4

November 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
	research of basin wide issues, motion to amend A.O.1 in SRBA and Supreme Court cases in Idaho re challenging SRBA rulings on constitutional grounds -- my review of cases sent by E.P.E.; related conference with MVZ -- affects all SRBA cases and motion to consolidate and stay cases.	0.70	199.50
10/05/00	MVZ1 Scheduling issues and discovery issues for trip to Boise.	0.75	213.75
10/06/00	EPE1 Complete memo regarding designation of Basin-wide issue; continue substantive research relating to same.	1.30	162.50
10/09/00	EPE1 Amend memo and continue research regarding jurisdiction of SRBA court to hear constitutional challenges to administrative rules.	0.90	112.50
10/11/00	EPE1 Amend memo and continue research regarding jurisdiction of SRBA court to hear constitutional challenges to administrative rules.	0.80	100.00
10/11/00	EPE1 Draft memos regarding case summaries (Basin-side issues).	0.70	87.50

JL 0209

MCQUAD, METZLER, BELFORD & VAN ZANDT LLP

Page 5

November 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
10/12/00 EPE1	Continue drafting memos regarding case summaries (Basin-side issues).	0.30	37.50
10/13/00 CAP1	Review memo and case summaries of SRBA cases re basin wide issues and constitutional issues all re our motions to set aside partial decrees and whether we should move to consolidate cases as basin wide issues.	0.30	85.50
10/13/00 EPE1	Continue basin-side case summaries; draft memo to Michael Van Zandt and Craig Pridgen regarding same.	0.60	75.00
10/19/00 CAP1	Review court notices re hearing October 30th - motion to consolidate and "test" case; long telephone conference with Larry Brown re same and re discovery of documents - all cases; telephone conference with Fred Price re same and additional document discovery.	0.30	85.50
10/20/00 CAP1	Telephone conferences with Tim Spencer and Roger Ling re association of local counsel - all cases in lieu of Harris who is unavailable this month; conference with Tony F. re pending		

JL 0210

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 6

November 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
	discovery - all cases; revise discovery pleadings.	0.30	85.50
10/23/00 CAP1	Telephone conference with Paul Nettleton re		
10/23/00 CAP1	Two long telephone conferences with Larry Brown re hearings next week, motion to consolidate - amendment of motion and fact that BIM may seek order staying all of our clients cases except LU 55-13450 and re discovery - production of documents on 10-31-00.	0.30	85.50
10/25/00 CAP1	Two long telephone conferences with Larry Brown re document production - patent files - we need location maps, Taylor Grazing Act files - same destroyed - and permit files - probably do not have LU Ranches - conference telephone call with Fred Price and Larry re meetings next week.	0.30	85.50
10/25/00 MVZ1	Scheduling issues with Mr. Pridgen; local counsel issues; discovery issues.	0.45	128.25

REDACTED

JL 0211

MCQUAAD, METZLER, BELFORD & VAN ZANDT LLP

Page 7

November 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
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10/26/00	MVZ1	Conference with Mr. Pridgen regarding status conference next week and issue of staging our cases; telephone call from Ms. Ewens; strategy session regarding	
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REDACTED

10/27/00	CAP1	Long telephone conference with Larry Brown - claims we only represent for matters the rest are stayed - telephone conference with Tony F. re same and he is to verify - also re document review on 10-31-00 in Boise.	0.45	128.25
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10/27/00	CAP1	Review Haige decisions for oral argument on Motion to Consolidate; prepare oral argument for hearing including review cases of SRBA re prior motions for basin wide or "test" cases.	0.60	171.00
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10/29/00	CAP1	Review cases -- Haige -- New Mexico -- re motion to consolidate and stay cases and preparation for hearing on 10/30/00 including review of US pleadings and motion; total time including travel to Twin Falls:	0.80	228.00
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JL 0212

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 8

November 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
10/30/00	CAP1	1.00	285.00
	10.5 hours.		
	Finish preparation for hearing on joint motion to consolidate and stay cases; pre-hearing conference with attorneys Shamanko, Long and Brown, Fred Price, Peter Amper; attend hearing on motion; post hearing conference with Norm Shamanko and Larry Brown re briefing schedule and our motion to participate; conference with Bert Brackett and telephone call with Tim Lowry re same and results of hearing; telephone call with MVZ re results of hearing on motion to consolidate; telephone call with E.P. Ewens re her call to me on Brackett research and Lull research which affects all cases.		
10/31/00	CAP1	0.80	228.00
	Meeting with Fred Price -- review BLM files, grazing files, Taylor Grazing Act files -- not all available, identify additional files we need from US -- did find some good documents, Fred will get additional files, we need to ID if Joyce acquired grazing -- L.U.M. rights but not		

JL 0213

MCQUAID, METZLER, BELFORD & VAN ZANDT ^{LLP}

Page 9

Joyce Livestock

November 7, 2000

Our File Number: 21381-001/MVZ1
Invoice Number 17432

Matter Title: In Re SRBA, Case No. 39576

Services rendered	Hours	Amount
base property. Total		
time including travel		
Twin Falls -- Boise and		
Boise -- Reno: 5.4 hours.	3.80	1,083.00
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Total for Professional Services	21.25	\$4,772.25
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Summary	Hours	Rate	Total
Michael J. Van Zandt	2.65	285.00	755.25
Craig A. Pridgen	10.50	285.00	2,992.50
Anthony L. Francois	0.20	185.00	37.00
Elizabeth Ewens	7.90	125.00	987.50

JL 0214

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 Main Street, 16th Floor
San Francisco, California 94105
(415) 905-0200

Federal Identification No. 94-3244361

October 5, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH SEPTEMBER 30, 2000

Balance Forward	
Total for Professional Services	
Total Advanced Costs	---
Total Current Fees and Costs	---
Total Amount Due	

REDACTED

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 2

October 5, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
09/01/00 CAP1	Two long telephone conferences with Elizabeth Ewens re research projects for Idaho clients - SRBA cases and re motion to amend Admin Order #1 and re cases she reviewed - Idaho Supreme Court.	0.20	57.00
09/01/00 MVZ1	Review orders from SRBA court.	0.35	99.75
09/06/00 CAP1	Review fax of status conference notice for September 18th; telephone call to L. Brown re same; telephone call to Semanko re same; conference with M. Van Zandt re same - CAP to attend.	0.30	85.50
09/06/00 MVZ1	Telephone call from Helen Chenoweth-Hage regarding settlement issue with State of Idaho and possible resignation of Judge Woods; discussion of public meeting and set aside of default decrees with Mr. Pridgen; public information notice.	0.35	99.75
09/06/00 EPE1	Continue researching and briefing Idaho Supreme Court cases relevant to SRBA litigation.	0.70	87.50
09/08/00 CAP1	Long telephone call to Elizabeth Ewens re case summaries in SRBA and key		

JL 0216

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 3

Joyce Livestock

October 5, 2000

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
09/08/00 EPE1	issues re admin. order #1. Continue research and analysis of SRBA decisions.	0.20	57.00
09/11/00 CAP1	Long telephone call to Norm Semanko re September 18 status conference and positions we will take including objecting to a consolidated test case and/or setting aside defaults; also re issues involving Judge Wood being transferred and Supreme Court issues - wants to keep Wood on court but will request legislative intervention.	1.10	137.50
09/11/00 ALF1	Confer with CAP re: reassignment of Judge Wood and US Attorney Larry Brown from SRBA court and assignment of new judge and effect on all pending cases and motions.	0.40	114.00
09/12/00 CAP1	Three telephone calls to and from Larry Brown re status conference on 18th and status conferences set for L.U. Ranches, Bracketts and Joyce Livestock September 28; also re Judge Wood and Justice Eisman - U.S. will disqualify Justice Eisman on SRBA cases	0.30	55.50

JL 0217

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 4

October 5, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
09/12/00 ALF1	because of campaign for election; conference with M. Van Zandt re same - Note: time divided between all clients, also review joint motion for consolidation of cases and for stay filed jointly by Semanko and L. Brown.	0.54	153.90
09/13/00 CAP1	Confer with MVZ and CAP re: reassignments of Judge Wood and DOJ attorney.	0.20	37.00
	Long telephone call to Richard Harris re upcoming court dates and issues re Judge Wood and Justice Eisman and pending motions; conference with M. Van Zandt re above.	0.20	57.00
09/14/00 CAP1	Long telephone call from Paul Nettleton re	0.20	57.00
09/15/00 CAP1	Telephone conference with Paul Nettleton re CAP to call Roxanne re review of maps.	0.20	57.00
09/17/00 CAP1	Travel to Twin Falls for status conference, informal meeting and hearing on Semanko's and Brown's stipulation to consolidate and stay		

REDACTED

JL 0218

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 5

October 5, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
09/18/00 CAP1	cases; review pleadings and Idaho code sections; prepare for hearing. (total time 7.5 hrs.)	0.94	267.90
09/18/00 CAP1	Attend hearings at SRBA court - argue status of consolidation and stay issues - Judge will decide if we file briefs and have another hearing; argue issues re default decrees related pre and post hearing conferences with D. Ampe, L. Brown, S.M. Dolan and N. Semanko; travel to Oakland (total time 11.6 hrs.)	2.13	607.05
09/18/00 EPE1	Telephone conference with IDWR re research; telephone conference with Lexis representative re same; continue to review and brief Idaho Supreme Court cases relevant to SRBA litigation.	0.70	87.50
09/19/00 MVZ1	Update from Mr. Pridgen on status conference and public meeting.	0.45	128.25
09/19/00 EPE1	Continue researching and briefing Idaho Supreme Court cases relating to the SRBA.	0.90	112.50
09/20/00 CAP1	Long telephone call to E. Ewens re her research on law of Basin Wide issues		

JL 0219

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 6

October 5, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
	and certifying same, also affect on our costs if court consolidates and has a test case "Law of the Case" issues; conference with M. Van Zandt re above and status of motions we filed to set aside default decrees and what we can do to get a ruling.	0.40	114.00
09/20/00 MVZ1	Confer with Mr. Pridgen regarding basin-wide issue concerning stockwater claims and need for resolution of default decree set aside issue through motion or letter requirement; review letters from DWR regarding bifurcation issue.	0.85	242.25
09/21/00 MVZ1	Meet with Ms. Ewens, legal assistant; analyze need for motion for basin-wide issue on partial decrees set aside; conference with Mr. Francois regarding legal issues being argued by BLM and impact on our cases; status of discovery; tasks to Ms. Ewens to meet discovery deadlines.	1.25	356.25
09/21/00 EPE1	Conference with Michael Van Zandt re: SRBA litigation.	0.80	100.00

JL 0220

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 7

October 5, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
09/22/00 MVZ1	Review motion to set aside decrees and research provided by Ms. Ewens; SRBA judge replacement issue.	0.45	128.25
09/22/00 EPE1	Review briefs and other documents relating to motions to set aside Partial Decrees; draft memo to Michael van Zandt	0.80	100.00
09/25/00 CAP1	Long telephone call to Larry Brown re position of U.S. on each case set for hearing on 9/28, also re hearing October 30th - notice being marked.	0.40	114.00
09/25/00 EPE1	Complete review of motions and transcripts relating to Due Process issues; draft letter to IDWR re: requests for orders on due process and procedural issues.	0.90	112.50
09/27/00 CAP1	Telephone conference with Larry Brown re scheduling conference tomorrow and discovery issues - we will set for trial.	0.20	57.00
09/27/00 CAP1	Long telephone conference with Larry Brown re hearing scheduled for October 30 re motion to consolidate cases and "test case" issues, also re continuing trial on		

JL 0221

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 8

October 5, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
09/27/00	remand case on issues of whether water rights are apportioned to base property - LU Ranches - we want this case to proceed to hearing before consolidated cases; related conference with Michael Van Zandt re same; related review of all client files.	0.20	57.00
09/27/00	Draft letter for Congressman Chenowith-Hage regarding U.S. challenge to Justice Eismann; telephone call with congressman.	0.35	99.75
09/27/00	Continue research re designation of Basin-wide issue and basis for request for attorneys fees.	0.70	87.50
09/28/00	Telephone conference with Elizabeth Ewens re her research of SRBA cases and re contents of motion to set aside defaults and to file late objection - telephone call from court re hearings on October 30th re consolidation of cases and "test case".	0.20	57.00
09/28/00	Attend status conference via phone - established April 1, 2001 trial date with motions due 60 days before and discovery		

JL 0222

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 9

October 5, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 17004

Matter Title: In Re SRBA, Case No. 39576

Services rendered	Hours	Amount
cutoff January 15th; telephone conference with Paul re		

REDACTED

09/28/00	EPE1	Continue research re designation of Basin-wide issue and procedural due process issues.	1.30	370.50
			0.60	75.00
			19.76	\$4,429.60
		Total for Professional Services		

Summary	Hours	Rate	Total
Michael J. Van Zandt	4.05	285.00	1,154.25
Craig A. Pridgen	8.01	285.00	2,282.85
Anthony L. Francois	0.50	185.00	92.50
Elizabeth Ewens	7.20	125.00	900.00

JL 0223

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

221 Main Street, 16th Floor
San Francisco, California 94105

(415) 905-0200

Federal Identification No. 94-3244361

September 7, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 16559

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH AUGUST 31, 2000

Balance Forward	
Total for Professional Services	---
Total Advanced Costs	---
Total Current Fees and Costs	---
Total Payments and Adjustments	---
Total Amount Due	===

REDACTED

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 2

September 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16559

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
08/01/00 CAP1	Telephone conferences with Peter Ampe and Larry Brown re continuance of trial and related research of Administrative Order No. 1 for procedures; telephone conference with Amy at SRBA re same. and new scheduling; finish motion and CAP declaration.	1.30	370.50
08/01/00 ALF1	Confer with CAP and legal research re: court's authority to reset hearing dates, and procedure for same.	0.30	55.50
08/03/00 CAP1	Preparation of letter to U.S. Archives per telephone conference with Larry Brown for files leading to patients; telephone conference with Larry Brown re same; review client file and claims we need documents for.	1.80	513.00
08/04/00 CAP1	Conference with Tony re client claims in Idaho - scheduling motions to file late claims and to set aside default decrees and CAP prior to research re same.	0.60	171.00
08/08/00 CAP1	Two telephone-conferences with Larry Brown re revisions to stipulation		

JL 0225

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 3

September 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16559

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
	re trial date continuance; finish stipulation and order, letter to Ampe and Brown re same; letter to court re same; conference with Tony F. re documents produced and received from U.S. - Fred Price; CAP review of same - specifically files only Paul looked at; telephone conference with Paul Nettleton.	4.30	1,225.50
08/08/00 ALF1	Confer with CAP re: discovery issues and further documents to be located (.9), review documents provided by BLM (1.2), telephone message to Fred Price to confirm whether base property for Silver City allotment has been identified (.1).	2.20	407.00
08/09/00 CAP1	Telephone conference from S.M. Dolan re motion to vacate trial - he will sign order and set new hearing also wanted status of any settlement.	0.40	114.00
08/11/00 CAP1	Long telephone conference with Paul Nettleton re		REDACTED
08/15/00 CAP1	Telephone conference Ampe	0.50	142.50

JL 0226

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 4

Joyce Livestock

September 7, 2000

Our File Number: 21381-001/MVZ1
Invoice Number 16559

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
08/16/00 CAP1	re getting complete copy of all cases involving SRBA cases and rulings - access SRBA web site - Idaho Bav has put summary of all cases on Web - only through 1999- review of same; conference with M. Van Zandt re same and having Elizabeth Ewens review and revise same.	0.45	128.25
08/16/00 CAP1	Telephone conference with Larry Brown re Joyce cases and changes to our pending motion and stipulation to vacate trial and set new status conference; revise same per Brown's request.	0.80	228.00
08/16/00 MVZ1	Confer with Mr. Pridgen and Mr. Francois regarding compendium of cases for SRBA; discuss status of cases and approach.	0.25	71.25
08/18/00 MVZ1	Scheduling issues and discussion of use of paralegal to track cases in SRBA.	0.45	128.25
08/21/00 CAP1	Conference with M. Van Zandt re		

REDACTED

telephone conference with

JL 0227

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 5

September 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16559

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
08/21/00	CAP1 Elizabeth Ewen re research projects on all Idaho cases - we will have her do initial research of all cases in SRBA.	0.40	114.00
08/21/00	CAP1 Telephone conference with John Buttev from U.S. Archives re documents patient files - for Joyce Livestock.	0.30	85.50
08/30/00	EPE1 Research SRBA cases relating to Administrative Order #1 cases decided by the Idaho Supreme Court.	0.20	25.00
08/31/00	EPE1 Continue research of relevant SRBA cases and orders; telephone conference with SRBA clerk re same.	0.10	12.50
Total for Professional Services		14.35	\$3,791.75

Summary	Hours	Rate	Total
Michael J. Van Zandt	0.70	285.00	199.50
Craig A. Pridgen	10.85	285.00	3,092.25
Anthony L. Francois	2.50	185.00	462.50
Elizabeth Ewens	0.30	125.00	37.50

JL 0228

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 6

September 7, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16559

Matter Title: In Re SRBA, Case No. 39576

REDACTED

JL 0229

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

221 Main Street, 16th Floor
San Francisco, California 94105
(415) 905-0200

Federal Identification No. 94-3244361

August 10, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH JULY 31, 2000

Balance Forward	
Total for Professional Services	----
Total Advanced Costs	----
Total Current Fees and Costs	----
Total Payments and Adjustments	----
Total Amount Due	===:

REDACTED

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 2

August 10, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
07/05/00 MVZ1	Review of discovery materials and issues.	0.65	185.25
07/05/00 ALF1	Confer with CAP re: discovery and follow up.	0.10	18.50
07/12/00 ALF1	Confer with CAP re: scheduling and matters on calendar, check website to confirm information and report to CAP.	0.50	92.50
07/17/00 CAP1	Long telephone call from Larry Brown re application of Rule 36a - facts of case and fact he thinks this will allow U.S. to prevail on claims, also re setting aside default decrees; review Rule 36a.	1.20	342.00
07/17/00 ALF1	Skim DOJ responses to discovery requests and confer with CAP re: same.	0.20	37.00
07/19/00 CAP1	Conference with Tony re discovery against U.S. - Tony will provide outline for next week's trip to BOR field office to inspect documents, CAP review of U.S. response and objections to our discovery demands, conference with Tony re same.	1.60	456.00
07/20/00 CAP1	Conference with Tony re possibility of reopening		

JL 0231

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 3

August 10, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
07/21/00 CAPI	case and setting aside prior Judgment based upon reversal of LU Ranches decision, also re meeting next week at BOR and items he needs to get for me by Tuesday. Review files for trip to Idaho and Tony's memo and discovery - review with Tony who will be out next week, dictation re items from file I need to take. Telephone conferences with client re meeting Wednesday - left message; telephone call to Fred and Larry Brown re request inspection of documents at BOR Wednesday morning - left detailed messages.	0.80	228.00
07/21/00 ALF1	Confer with CAP re: discovery requests and documents to be inspected.	1.60	456.00
07/24/00 CAPI	Long telephone conference with Fred Price re meeting Wednesday morning to begin discovery at BOR - Fred did not get my message left Friday - discussed what would be available and what he does not have - gave him list of files/topics we wanted to look at first; telephone conference with Paul re	0.70	129.50

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JL 0232

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 4

August 10, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

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	Services rendered	Hours	Amount
07/25/00 CAP1	Follow up telephone conference with Fred Price to confirm meeting for discovery; prepare for examination of documents, related review of file, review response to our demands for production, review Tony's outline; prepare my outline of key documents to find on this trip - I.D. patents, use documents, grazing permits - all done in transit and in the afternoon.	1.20	342.00
07/26/00 CAP1	Meeting at IDWR with Rosanne Brown re water rights database to determine competing claims on allotments to avoid need to physically examine all U.S. and client claims - system is not perfect but will cut costs - Rosanne will run date if we provide allotment descriptions.	2.60	741.00
07/26/00 CAP1	Meeting - Paul, Fred Price at BOR - begin review and copy documents produced, conference with Fred to have Brown call re continuance of trial and	0.60	171.00

JL 0233

MCQUAID, METZLER, BELFORD & VAN ZANDT LLP

Page 5

August 10, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
07/27/00 CAP1	lack of timely discovery demands by U.S. Prepare for meeting at SRBA - met with Special Master Dolan, Peter Ampe and Larry Brown after informal meeting at 10:00 a.m. - which I did not attend - but got all the information from Dolan - Judge Wood will entertain a motion to amend Administrative Order No. 1 to allow motions to file late claims or set aside defaults if claimant can show lack of notice - although exact terms would have to be set by court - Ampe thinks we should file the motion - Larry Brown will oppose any such motion.	4.30	1,225.50
07/28/00 CAP1	Long telephone conference with L. Brown re motion to set aside decrees - also re follow up on discovery issues and additional document production - will schedule 2nd trip ASAP but will try to coordinate with matters for other clients.	1.40	399.00
07/28/00 CAP1	Conference with MVZ re trip to Idaho - document production at BLM, meeting with Roxanne	0.60	171.00

JL 0234

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 6

August 10, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

Services rendered	Hours	Amount
Brown at IDWR re access to database to determine U.S. competing claims on clients' allotments and re meetings in Twin Falls with Ampe, Brown and Special Master Dolan re public comments on Notice and Due Process issues; prepare Notice of Appearance for all clients to be filed with SRBA court to insure notice of all matters; telephone conference with Norm Semanko re public meeting - left message; draft letter to all clients re		
long telephone call with Larry Brown re discovery issues and motion to amend Administrative Order No. 1 (see p. 2)	0.85	242.25
(see p. 1) U.S. will fight, discussed basis of U.S. objection - U.S. legal basis to object to motion - he has no real authority.	0.05	14.25
Review and analysis of responses by US to requests for admissions and interrogatories; meet with Mr. Pridgen to discuss document inspection.	1.25	356.25

REDACTED

JL 0235

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 7

August 10, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
07/31/00 CAP1	Long telephone conference with Larry Brown re motion by stipulation to continue trial and for new schedule - discovery not complete; conference with Tony and MVZ re same - begin preparation of motion; telephone conference with Fred Price re document production; conference with Tony re his telephone conference with Price.	2.30	655.50
07/31/00 MVZ1	Confer with Mr. Pridgen on need to continue trial ;review discovery and need to retrieve documents from national archives.	0.75	213.75
07/31/00 ALF1	Confer with CAP re: conduct of document inspection in Boise (.2), confer with Fred Price re: copies of documents being delivered (.1), confer with CAP and MVZ re: US motion for summary judgment and for continuance based upon time required for US to produce historical documents (.4), review documents produced in Boise on 7/25 (.6).	1.30	240.50
Total for Professional Services		24.55	\$6,716.75

JL 0236

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 8

August 10, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16297

Matter Title: In Re SRBA, Case No. 39576

Summary	Hours	Rate	Total
Craig A. Pridgen	19.10	285.00	5,443.50
Michael J. Van Zandt	2.65	285.00	755.25
Anthony L. Francois	2.80	185.00	518.00

REDACTED

JL 0237

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 Main Street, 16th Floor
San Francisco, California 94105
(415) 905-0200

Federal Identification No. 94-3244361

July 26, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 16016

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH JUNE 30, 2000

Balance Forward	
Total for Professional Services	
Total Advanced Costs	---
Total Current Fees and Costs	---
Total Payments and Adjustments	
Total Amount Due	===

REDACTED

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 2

July 26, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16016

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
06/15/00 ALF1	Review file, confer with CAP, telephone conference with counsel for USDI, and prepare stipulation to extend discovery.	1.10	203.50
06/21/00 ALF1	Confer with MVZ re: discovery for SRBA claims, review Idaho discovery rules and outline general discovery demands to be propounded for stockwater claims.	1.40	259.00
06/26/00 ALF1	Complete outline of SRBA discovery (.75)	0.80	148.00
06/27/00 ALF1	Review claim information and analyze competing BLM claims.	1.60	296.00
06/28/00 MVZ1	Review discovery request from Mr. Francois; confer with Mr. Pridgen.	0.85	242.25
06/28/00 ALF1	Complete comparison of US claims and Joyce Livestock claims (.8), review file (.3), outline and draft discovery requests (1.1), telephone inquiry to Paul Nettleton		
06/29/00 MVZ1	Continue review of statutes supporting stockwatering rights on federal land; confer with Mr. Pridgen.; review	2.30	425.50

REDACTED

JL 0239

MCQUAD, METZLER, BEDFORD & VAN ZANDT LLP

Page 3

July 26, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 16016

Matter Title: In Re SRBA, Case No. 39576

Services rendered	Hours	Amount
materials from Mr. Francois.	1.15	327.75

06/29/00 ALF1 Telephone conference with Paul Nettleton

review warranty deeds
listing base property and
identify locations (1.2),
prepare discovery demands
and finalize notice of
serving discovery (1.2).

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	3.00	555.00
Total for Professional Services	12.20	\$2,457.00

Summary	Hours	Rate	Total
Michael J. Van Zandt	2.00	285.00	570.00
Anthony L. Francois	10.20	185.00	1,887.00

REDACTED

JL 0240

MCQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

221 Main Street, 16th Floor
San Francisco, California 94105
(415) 905-0200
Federal Identification No. 94-3244361

June 16, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 15589

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH MAY 31, 2000

Balance Forward	
Total for Professional Services	
Total Advanced Costs	----
Total Current Fees and Costs	----
Total Amount Due	===

REDACTED

McQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 2

Joyce Livestock

June 16, 2000

Our File Number: 21381-001/MVZ1
Invoice Number 15589

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
03/31/00 CAP1	Review file re scheduling order; conference with MVZ re same and opening new file and telephone conference with Mr. Grant re getting files and setting new scheduling order.	0.80	228.00
05/01/00 CAP1	Long conference with MVZ re status of all cases briefing schedules, calendaring, key issues and staffing.	0.34	96.90
05/01/00 MVZ1	Review orders from SRBA court regarding trial and discovery; discuss trial schedule and issues with Mr. Pridgen.	0.45	128.25
05/02/00 MVZ1	Coordinate calendaring and status tracking system with Ms. Stone and Ms. Dant.	0.65	185.25
05/04/00 CAP1	Telephone call from Larry Brown re entering into a stipulation of facts - he will fax copy of prior stipulation which Harris prepared.	0.30	85.50
05/04/00 MVZ1	Confer with paralegal regarding management system for SRBA cases; meet with office administrator and Mr. Pridgen to develop database for cases; review database and		

JL 0242

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 3

Joyce Livestock

June 16, 2000

Our File Number: 21381-001/MVZ1
Invoice Number 15589

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
	schedule.	0.45	128.25
05/04/00 SXR1	Meeting to discuss case management of files and documents; draft spread sheet regarding the same.	1.20	120.00
05/05/00 SXR1	Continue spread sheet and case management.	0.75	75.00
05/08/00 SXR1	Updated working case management report regarding claim status.	0.10	10.00
05/10/00 SXR1	Draft withdrawal of Motion to Set Aside Partial Decree for basin #51-04036 and Draft Motion to Set Aside Partial Decree for basin #51-04063.	0.30	30.00
05/24/00 SXR1	Research and Review Case Status. Information and create working spreadsheet regarding the same.	1.10	110.00
	Total for Professional Services	6.44	\$1,197.15

Summary	Hours	Rate	Total
Michael J. Van Zandt	1.55	285.00	441.75
Craig A. Pridgen	1.44	285.00	410.40
Samantha Roetzer	3.45	100.00	345.00

JL 0243

McQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 4

June 16, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 15589

Matter Title: In Re SRBA, Case No. 39576

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JL 0244

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

221 Main Street, 16th Floor
San Francisco, California 94105
(415) 905-0200

Federal Identification No. 94-3244361

May 8, 2000

Joyce Livestock
c/o Paul Nettleton
Sinker Creek
Murphy, ID 83650

Our File Number: 21381-001/MVZ1
Invoice Number 14913

Matter Title: In Re SRBA, Case No. 39576

STATEMENT FOR PERIOD THROUGH APRIL 30, 2000

Total for Professional Services	---
Total Advanced Costs	---
Total Current Fees and Costs	---
Total Amount Due	===

REDACTED

JL 0245

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 2

May 8, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 14913

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
03/31/00 MVZ1	Telephone call to Mr. Harris regarding stipulation to continue discovery.	0.45	128.25
04/03/00 CAP1	Long telephone call from Art Fritz - U.S. Attorney re statement of facts upcoming status and scheduling conference with Judge, wants to stay the cases and use western stock growers as a test case.	0.50	142.50
04/04/00 MVZ1	Review case file sent by Stewards of the Range.	0.75	213.75
04/05/00 CAP1	Telephone conference with R. Harris re need for Pro Hac Motions by Monday; telephone conference with Harris and Brown re vacating trial date and setting status conference with Special Master Dolan - April 17th.	0.60	171.00
04/05/00 MVZ1	Meet with Mr. Pridgen and Mr. Francois regarding filing pro hac vice applications; prepare applications; direction on research.	0.95	270.75
04/05/00 ALF1	Confer with MVZ and CAP re: status of case and association of local counsel.	0.30	55.50
04/11/00 ALF1	Review order denying		

JL 0246

MCQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 3

May 8, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 14913

Matter Title: In Re SRBA, Case No. 39576

	Services rendered	Hours	Amount
04/13/00 CAP1	motion to extend time and confer with MVZ re: same (.1), telephone call to Richard Harris re: same and confer with staff to confirm scheduling (.5).	0.60	111.00
04/14/00 CAP1	Long telephone call from Larry Brown re status of case and scheduling conference next week; telephone conference with Nick Spencer IDWR re same - telephone conference with Brown - he will set up conference telephone call and call all parties.	1.20	342.00
04/14/00 CAP1	Long telephone call from Larry Brown re status of case and scheduling conference next week; telephone conference with Nick Spencer IDWR re same - telephone conference with Brown - he will set up conference telephone call and call all parties.	1.20	342.00
04/14/00 MVZ1	Telephone call from Fritz Holleran regarding stipulated facts and pre-trial order.	0.65	185.25
04/17/00 CAP1	Long conference telephone call with Special Master Dolan re status of case - all 4 subcases will remain consolidated - pursuant to U.S. position; Special Master		

JL 0247

McQUAID, METZLER, BEDFORD & VAN ZANDT LLP

Page 4

May 8, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 14913

Matter Title: In Re SRBA, Case No. 39576

Services rendered	Hours	Amount
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wants "test case" =
Western Stockgrowers -
but everyone to be bound
by results - I objected
because of factual
differences; state
objected to U.S. priority
dates but has now settled
with U.S.BLM - did not
give date; dates given
discovery by June 16;
dispositive motions filed
by August 4th, Pre-trial
August 25, Trial Sept 7.

04/17/00	ALF1	1.20	342.00
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Confer with CAP re:
scheduling of discovery,
law and motion,
pre-trial, and trial.

04/24/00	CAP1	0.10	18.50
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Telephone call from Larry
Brown re briefing
schedule and issues of
stay or breaking out
cases.

		0.30	85.50
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Total for Professional Services		8.80	\$2,408.00
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Summary

	Hours	Rate	Total
Craig A. Pridgen	5.00	285.00	1,425.00
Michael J. Van Zandt	2.80	285.00	798.00
Anthony L. Francois	1.00	185.00	185.00

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JL 0248

McQUAID, METZLER, BEDFORD & VAN ZANDT ^{LLP}

Page 5

May 8, 2000

Joyce Livestock

Our File Number: 21381-001/MVZ1
Invoice Number 14913

Matter Title: In Re SRBA, Case No. 39576

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JL 0249



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