AOC-S-CN Doc Code: NH
Rev. 7-99

Commonwealth of Kentucky
Court of Justice

Case Number **11-P-00050**
Court **DISTRICT**
County **CRITTENDEN**

# Court Notice

*Plantiff,* **ESTATE OF: CHANDLER, HAROLD KEITH,** *Defendant*

CHANDLER, STEVE
454 WESTON ROAD
MARION KY 42064

**You are hereby notified that the above case is scheduled/rescheduled for:**

| Date | Time | Location |
|---|---|---|
| 08/29/2018 | 09:00 AM | Courtroom A |
| CRITTENDEN COUNTY COURTHOUSE, 107 S. MAIN STREET, MARION KY 42064 | | |

**in CRITTENDEN DISTRICT.**

**FILED**
**06-27-2018**
**Circuit/District Clerk, MELISSA GUILL**
**By** Donna Kay **, DC**

D1 11-P-00050
ESTATE OF: CHANDLER, HAROLD KEITH

3 DI 11-P-00050 **ESTATE OF: CHANDLER, HAROLD KEITH**

☐

| | | |
|---|---|---|
| ☐ MOORE, BRUCIE W. | ATTORNEY-PRIVATE | MOORB |
| ☐ POWELL, KAYCE R. | ATTORNEY-PRIVATE | KPOWELL |
| ☐ RANDOLPH, MEGAN, | ATTORNEY-PRIVATE | RANDM |
| ☐ CHANDLER, HAROLD KEITH | DECEDENT | |
| ☐ CHANDLER, STEVE | FAMILY MEMBER | |
| ☐ ROBINSON, WILLIAM | PETITIONER / FIDUCIARY | |

☐ Bail Credit Denied ☐ Danger to self or others ☐ Flight Risk

**REVIEW**
Sch Memo: *COURT REVIEW-CASE ON APPEAL*

Appeal final
Ct to
Settlement
Memo to
Status

ENTERED 6/27/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
DK IDC

 Judge Signature: _____

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**ORDER**

This motion having been brought on motion of William Robinson, Executor of the Estate of Harold Keith Chandler, by and through counsel, having come before the Court for a hearing on May 30, 2018, and it appearing to the Court that all parties have been given Notice of the hearing, and the Court being otherwise sufficiently advised herein HEREBY ORDERS AND ADJUDGES that the Executor, William Robinson, is awarded an executor's fee in the amount of ~~$35,000.00~~ THIRTY-FIVE THOUSAND DOLLAR.

Signed and Entered this the 30th day of May, 2018.

DANIEL M. HEADY Judge
Crittenden District Court, Probate Division

Prepared by: Megan D. Randolph, Attorney at Law, MOORE & WALLACE, 110 South Court Street, P. O. Box 210, Morganfield, KY 42437, Phone: (270) 389-1200.

Megan D. Randolph

ENTERED 5/30/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
CC/DC

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**ORDER**

This motion having been brought on motion of the Estate of Harold Keith Chandler, by and through counsel, having come before the Court for a hearing on May 30, 2018, and the Court being otherwise sufficiently advised herein HEREBY ORDERS AND ADJUDGES that the Executor is AUTHORIZED to transfer and distribute the personal property of the Estate of Harold Keith Chandler to the Beneficiary and/or the Trustee on behalf of the Beneficiary. This personal property includes, but is not limited to, vehicles and firearms. The Executor is further AUTHORIZED to execute any documents necessary to transfer and distribute the personal property of the Estate of Harold Keith Chandler to the Beneficiary and/or the Trustee on behalf of the Beneficiary.

Signed and Entered this the _____ day of _____, 2018.

DANIEL M. HEADY Judge
Crittenden District Court, Probate Division

Prepared by: Megan D. Randolph, Attorney at Law, MOORE & WALLACE, 110 South Court Street, P. O. Box 210, Morganfield, KY 42437, Phone: (270) 389-1200.

Megan D. Randolph

ENTERED 5/30/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
cc/dc

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**ORDER**

This motion having been brought on motion of the Estate of Harold Keith Chandler, by and through counsel, having come before the Court for a hearing on May 30, 2018, and the Court being otherwise sufficiently advised herein HEREBY ORDERS AND ADJUDGES that the Law Office of Moore & Wallace is awarded an attorney fee in the amount of $60,000.00.

Signed and Entered this the 30th day of May, 2018.

DANIEL M. HEADY Judge
Crittenden District Court, Probate Division

Prepared by: Megan D. Randolph, Attorney at Law, MOORE & WALLACE, 110 South Court Street, P. O. Box 210, Morganfield, KY 42437, Phone: (270) 389-1200.

Megan D. Randolph

ENTERED 5/30/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
CS/DC

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**ORDER**

This motion having been brought on motion of the Estate of Harold Keith Chandler, by and through counsel, having come before the Court for a hearing on May 30, 2018, and the Court being otherwise sufficiently advised herein HEREBY ORDERS AND ADJUDGES that the Executor is AUTHORIZED to transfer and distribute the personal property of the Estate of Harold Keith Chandler to the Trustee on behalf of the Beneficiary. This personal property includes, but is not limited to, vehicles and firearms. The Executor is further AUTHORIZED to execute any documents necessary to transfer and distribute the personal property of the Estate of Harold Keith Chandler to the Trustee on behalf of the Beneficiary.

Signed and Entered this the 31st day of May, 2018.

DANIEL M. HEADY Judge
Crittenden District Court, Probate Division

Prepared by: Megan D. Randolph, Attorney at Law, MOORE & WALLACE, 110 South Court Street, P. O. Box 210, Morganfield, KY 42437, Phone: (270) 389-1200.

Megan D. Randolph

ENTERED 5/30/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK cc/pc

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**ORDER**

This motion having been brought on motion of the Estate of Harold Keith Chandler, by and through counsel, having come before the Court for a hearing on May 30, 2018, and the Court being otherwise sufficiently advised herein HEREBY ORDERS AND ADJUDGES that Hon. Steven D. Downey is awarded an attorney fee in the amount of $27,686.58.

Signed and Entered this the 30th day of May, 2018.

DANIEL M. HEADY Judge
Crittenden District Court, Probate Division

Prepared by: Megan D. Randolph, Attorney at Law, MOORE & WALLACE, 110 South Court Street, P. O. Box 210, Morganfield, KY 42437, Phone: (270) 389-1200.

Megan D. Randolph

ENTERED 5/30/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
cc/DC

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**ORDER**

This motion having been brought on motion of the Estate of Harold Keith Chandler, by and through counsel, having come before the Court for a hearing on May 30, 2018, and the Court being otherwise sufficiently advised herein HEREBY ORDERS AND ADJUDGES that the Executor, the Trustee, the Beneficiary and all persons and entities having the approval and permission of the Executor, the Trustee, and the Beneficiary, including, but not limited to, appraisers, real estate agents and personnel, and timbering personnel are AUTHORIZED to enter, inspect, timber, sell, and any and all other action incident thereto the real property owned by the Estate of Harold Keith Chandler including, but not limited to, the property located at 187 Rudolph Chandler Road, Sturgis, Crittenden County, Kentucky. Further, the Executor is AUTHORIZED to enter into and execute any contracts, agreements, deeds, and any other related documents concerning either the timbering or sale of the real property.

Signed and Entered this the 30th day of May, 2018.

DANIEL M. HEADY Judge
Crittenden District Court, Probate Division

Prepared by: Megan D. Randolph, Attorney at Law, MOORE & WALLACE, 110 South Court Street, P. O. Box 210, Morganfield, KY 42437, Phone: (270) 389-1200.

Megan D. Randolph

ENTERED 5/29/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
cc/pc

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**MOTION FOR ATTORNEY FEE**

COMES the Estate of Harold Keith Chandler, by and through counsel, and requests the court approve a fair and reasonable attorney fee for Hon. Steven D. Downey.

AS GROUNDS for this Motion, the undersigned states Hon. Steven D. Downey has served as attorney for the Estate of Harold Keith Chandler throughout the Will Contest action in Crittenden Circuit Court, the post-trial motions and hearings, and the appeal of said action to its final resolution with an Order from the Kentucky Supreme Court denying Discretionary Review of the ruling from the Kentucky Court of Appeals upholding the verdict the Crittenden Circuit Court and upholding the Will of Harold Keith Chandler.

As the sole beneficiary in this Estate is a non-relative and his inheritance will far exceed the exemption amount, a Kentucky Inheritance Tax Return must be filed. To facilitate the filing of said return, the Estate requests the Court to approve a fair and reasonable attorney fee.

Respectfully submitted,

Megan D. Randolph
Attorney for the Estate of Harold Keith Chandler

FILED 5/25/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
DL IDC

MOORE & WALLACE
110 South Court Street
P.O. Box 210
Morganfield, KY 42437-0210
Phone: (270) 389-1200
Fax: (270) 389-1226

## NOTICE

PLEASE TAKE NOTICE that the foregoing Motion shall be brought on for hearing before the Hon. Daniel M. Heady, Judge, Crittenden District Probate Court, Courthouse, Marion, Kentucky, on the 30th day of May, 2018 at the hour of 9:00 a.m., or as soon thereafter as counsel may be heard.

## CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion has been served upon all parties by mailing a true and correct copy thereof to:

Melissa Guill, Clerk of Crittenden District Court, 202 Courthouse, 107 South Main Street, Marion, KY 42064 (also by fax); and

Hon. Daniel Heady, Crittenden District Judge, P O Box 289, Dixon, KY 42409.

On this 25th day of May, 2018.

Megan D. Randolph

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**MOTION FOR ATTORNEY FEE**

COMES the Estate of Harold Keith Chandler, by and through counsel, and requests the court approve an attorney fee in the amount of sixty thousand dollars ($60,000.00) for the Law Office of Moore & Wallace.

AS GROUNDS for this Motion, the Law Office of Moore & Wallace has served as attorney for the Estate of Harold Keith Chandler from the beginning of this action in July 2011. The Office has served as attorney for the Estate throughout the Will Contest action in Crittenden Circuit Court, the post-trial and post appeal of said action, and continues to serve as attorney working to finalize the Estate at present. The Office plans to continue serving until the estate is ultimately settled and the probate matter closed. Due to the circumstances of this probate and the cases related thereto, this fee is fair and reasonable compensation for the services rendered in representing the Estate.

As the sole beneficiary in this Estate is a non-relative and his inheritance will far exceed the exemption amount, a Kentucky Inheritance Tax Return must be filed. To facilitate the filing of said return, the Estate is requesting the court to approve the amount of this attorney fee. This fee includes the Office's work throughout the Will Contest and with the various components of the probate action.

FILED 5/25/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
DKIDC

Respectfully submitted,

Megan D. Randolph
Attorney for the Estate of Harold Keith Chandler

MOORE & WALLACE
110 South Court Street
P.O. Box 210
Morganfield, KY 42437-0210
Phone: (270) 389-1200
Fax: (270) 389-1226

**NOTICE**

PLEASE TAKE NOTICE that the foregoing Motion shall be brought on for hearing before the Hon. Daniel M. Heady, Judge, Crittenden District Probate Court, Courthouse, Marion, Kentucky, on the 30th day of May, 2018 at the hour of 9:00 a.m., or as soon thereafter as counsel may be heard.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion has been served upon all parties by mailing a true and correct copy thereof to:

Melissa Guill, Clerk of Crittenden District Court, 202 Courthouse, 107 South Main Street, Marion, KY 42064 (also by fax); and

Hon. Daniel Heady, Crittenden District Judge, P O Box 289, Dixon, KY 42409.

On this 25th day of May, 2018.

Megan D. Randolph

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**MOTION FOR EXECUTOR'S FEE**

COMES William Robinson, Executor of the Estate of Harold Keith Chandler, by and through counsel, and requests an executor's fee in the amount of twenty five thousand dollars ($25,000.00).

AS GROUNDS for this Motion the Executor states that on July 13, 2011, by order of this court, he was appointed temporary executor of the Estate of Harold Keith Chandler. By order of this court on July 20, 2011, he was appointed executor of the Estate of Harold Keith Chandler. Since his appointment, he has acted as Executor of the Estate of Harold Keith Chandler who died on July 5, 2011 in Crittenden County, Kentucky. It has been nearly seven years since Mr. Robinson's appointment as Executor.

Pursuant to KRS 395.150(2)(a), the court may allow an executor additional compensation as would be fair and reasonable for additional services rendered, if the additional services were unusual or extraordinary and not normally incident to the administration of a decedent's estate. Mr. Robinson has provided additional services that have been most unusual, extraordinary and clearly not normally incident to the administration of a decedent's estate.

FILED 5/25/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK DC 10c

Pursuant to KRS 395.195(19), the executor is authorized to defend claims for the protection of the estate. This is exactly what the executor has done in this case. A will contest action was filed against this estate on October 7, 2011. The executor has been embroiled in the will contest action since that date, keeping abreast of the progress of the action from complaint to verdict, to a lengthy processes through the Kentucky Court of Appeals and now finally to the decision of the Kentucky Supreme Court overruling Steve Chandler's Motion for Discretionary Review. The executor has had to complete interrogatories, obtain documents, give and attend depositions, and attend meetings and discussions too numerous to detail in preparation for trial. The executor was present for every moment of the jury trial in the will contest case. He has continued his service in the litigation by responding to every request made by the undersigned and by Hon. Steven D. Downey, the attorney for the Estate during the appellate portion of the will contest. This service is unusual and extraordinary and not normally incident to a decedent's estate.

Further, from the very outset, the administration of this estate has been unusual. On July 15, 2011, two days after he was appointed as temporary executor, Steve Chandler filed a motion to contest the probate of the will was filed in the Crittenden District Court. At that time, Steve Chandler was represented by Hon. Bart Frazer of Marion, Kentucky. At a hearing on July 20, 2011, Steve Chandler filed a second motion opposing the admission of the will to probate was filed in the District Court, but with a different attorney, Hon. Kayce Powell, at that time of Carterville, Illinois. The Court overruled both motions, admitted Keith's will to probate, and appointed William Robinson as Executor, pursuant to the provisions of the will.

A Will Contest was filed in the Circuit Court on October 7, 2011. A jury trial was conducted in the will contest on April 17, 18, and 21, 2014. During the 2.5 years between the filing and the trial, the executor was paying the property taxes, paying the vehicle taxes, mowing the yard, spraying for bugs, and routinely checking on the property. The executor's work in this has meant numerous trips to Crittenden County. Some of these trips have been quite unusual and extraordinary. For example, on more than one occasion roofing nails and other nails were scattered throughout Keith's driveway. The executor picked up nails in all eight tires on his truck and two tires on his trailer. On several trips to the property, law enforcement has been called. The executor has received anonymous phone calls relating to the estate and the will contest. He has sued personally and in his capacity as executor. The executor has had to call law enforcement as a result of a break-in to the home. Two individuals were charged with felony offenses after breaking into the home. The executor was the contact individual as the victim in those criminal cases. Finally, the executor suffered both a tick bite and a spider bite while mowing the yard and checking on the home. This resulted in more than four months of antibiotics and permanent scarring. All of this is unusual and extraordinary and not normally incident to a decedent's estate.

Due to Steve Chandler's open hostility to everyone involved in defending Keith's Will, the executor took Keith's vehicles and guns to his own home to hold and protect them during the pendency of the action. At this point, the executor has been storing these items for nearly seven years on his own property.

This motion is necessary as the lion's share of the value of the Estate is in the real property owned by Harold Keith Chandler. An Executor's fee of 5% based only on the

personalty of the Estate totals a little more than $6,500.00. That amount is wholly insufficient to compensate the Executor for all his work through this prolonged estate process. The request of $25,000.00 is roughly equivalent to 5% of the total estate including both realty and personalty based upon the 2011 appraisal of the real property.

The executor, by and through counsel, submits that he has rendered additional services and that the additional services were unusual or extraordinary and not normally incident to the administration of a decedent's estate. He thusly merits additional compensation.

Respectfully submitted,

Megan D. Randolph
Attorney for the Estate of Harold Keith Chandler

MOORE & WALLACE
110 South Court Street
P.O. Box 210
Morganfield, KY 42437-0210
Phone: (270) 389-1200
Fax: (270) 389-1226

**NOTICE**

PLEASE TAKE NOTICE that the foregoing Motion shall be brought on for hearing before the Hon. Daniel M. Heady, Judge, Crittenden District Probate Court, Courthouse, Marion, Kentucky, on the 30th day of May, 2018 at the hour of 9:00 a.m., or as soon thereafter as counsel may be heard.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion has been served upon all parties by mailing a true and correct copy thereof to:

William Robinson, 2816 Wilson Station Road, Henderson, KY 42420;

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**MOTION REGARDING PERSONAL PROPERTY**

COMES William Robinson, Executor of the Estate of Harold Keith Chandler, by and through counsel and petitions the Court for an order authorizing him to transfer and distribute the personal property in the Estate of Harold Keith Chandler to the Beneficiary and/or the Trustee on behalf of the Beneficiary; and for this motion, states as follows:

1. On July 13, 2011, by order of this court, William Robinson was appointed temporary executor of the Estate of Harold Keith Chandler. By order of this court on July 20, 2011, he was appointed executor of the Estate of Harold Keith Chandler, who died testate on July 5, 2011, a resident of Sturgis, Crittenden County, Kentucky.

2. From the outset, the probate of the Estate was rancorous. To protect the personal property of the Estate, the Executor housed several items of personal property, including vehicles and firearms, on his own property in Henderson County, Kentucky.

3. The litigation circulating around this Estate has been protracted and acrimonious. The contest began in July 2011 and has finally been resolved with an order from the Kentucky Supreme Court denying discretionary review of the decision of the Kentucky Court of Appeals upholding the Will of Harold Keith Chandler.

4. Throughout the litigation, the Executor has been the victim of false claims of misappropriating funds and or property of the Estate. Though these false claims were never made by the Estate, the Beneficiary, and/or the Trustee, to protect the Executor, he

FILED 5/25/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
DC

requests an Order authorizing the transfer and distribution of the personal property to the Beneficiary and/or the Trustee on behalf of the Beneficiary.

5. The heir of the Estate of Harold Keith Chandler is Peyton Fish, said estate to be held in trust for him with Randy Fish serving as Trustee. Peyton and Randy Fish reside at 620 Pike Street, Uniontown, Union County, Kentucky 42461.

6. The Executor of the Estate of Harold Keith Chandler is William Robinson, residing at 2816 Wilson Station Road, Henderson, Henderson County, Kentucky 42420.

AS GROUNDS for this Motion, the Kentucky Supreme Court rendered a decision denying discretionary review of the Kentucky Court of Appeals decision upholding the Will of Harold Keith Chandler. This ruling ends the protracted litigation regarding Keith's Will and allows Petitioners to move forward with probating Keith's estate according to his wishes.

Towards that end, the Executor is now in a position to transfer and distribute the personal property of the Estate to the Beneficiary and/or the Trustee on behalf of the Beneficiary. While the Executor is either explicitly granted the power to transfer and distribute said personal property or otherwise imbued with the same power, the Executor would ask the Court to take judicial notice of the history of this action, the Will Contest Action filed in the Crittenden Circuit Court, and the late contest of the probate action of Mary Katherine Chandler. Every step of the process in probating Keith's estate has been needlessly litigious and acrimonious.

To protect the Executor, he requests this Court enter an Order authorizing the transfer and distribution of the personal property to the Beneficiary and/or the Trustee on behalf of the Beneficiary.

Respectfully submitted,

Megan D. Randolph
Attorney for the Estate of
Harold Keith Chandler

MOORE & WALLACE
110 South Court Street
P.O. Box 210
Morganfield, KY 42437-0210
Phone: (270) 389-1200

**NOTICE**

PLEASE TAKE NOTICE that the foregoing Motion shall be brought on for hearing before the Hon. Daniel M. Heady, Judge, Crittenden District Probate Court, Courthouse, Marion, Kentucky, on the 30th day of May, 2018 at the hour of 9:00 a.m., or as soon thereafter as counsel may be heard.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion has been served upon all parties by mailing a true and correct copy thereof to:

William Robinson, 2816 Wilson Station Road, Henderson, KY 42420;

Melissa Guill, Clerk of Crittenden District Court, 202 Courthouse, 107 South Main Street, Marion, KY 42064 (also by fax); and

Hon. Daniel Heady, Crittenden District Judge, P O Box 289, Dixon, KY 42409.

On this 25th day of May, 2018.

Megan D. Randolph

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER
Date of Death: July 5, 2011

**MOTION REGARDING REAL PROPERTY**

COMES the Estate of Harold Keith Chandler, by and through counsel and petitions the Court for an order authorizing the entry, inspection, timbering, sale and all other actions incident thereto of the decedent's real estate; and for this motion, states as follows:

1. On July 13, 2011, by order of this court, William Robinson was appointed temporary executor of the Estate of Harold Keith Chandler. By order of this court on July 20, 2011, he was appointed executor of the Estate of Harold Keith Chandler, who died testate on July 5, 2011, a resident of Sturgis, Crittenden County, Kentucky.

2. The litigation circulating around this Estate has been protracted and acrimonious. The contest began in July 2011 and has finally been resolved with an order from the Kentucky Supreme Court denying discretionary review of the decision of the Kentucky Court of Appeals upholding the Will of Harold Keith Chandler.

3. The circumstances surrounding the probate of this Estate have been rancorous resulting in numerous calls to law enforcement concerning the real property that is the subject of this motion.

4. The Will of Harold Keith Chandler grants the Executor the authority to sell the real estate. Further, the Executor is imbued with the authority to do all things incident to the sale of the real estate.

FILED 5/25/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
DK IDC

5. Despite this explicit and inherent authority, the Estate of Harold Keith Chandler believes it necessary to move the Court to enter an Order authorizing the entry, inspection, timbering, sale and all other actions incident thereto of the decedent's real estate to protect the Estate and all persons acting on behalf of the Estate.

6. The real property that is the subject of this motion is located at 187 Rudolph Chandler Road, Sturgis, Crittenden County, Kentucky, and consists of approximately 238 acres, more or less. The real estate is more particularly described as follows:

**DESCRIPTION:**

**Parcel I**

**First Tract:**

BEGINNING at a stone near a grave yard, running thence S 58 W 6 poles to the top of a bluff, thence N 73 W 20 poles, thence N 81 W 20 poles to a white oak in an old line, thence with said line West 35 poles to a black oak, thence N 11 W 52 poles to a post-oak, thence N 80 E 19 poles to ash, thence N 11 W 20 poles to a white oak, thence N 33¾ W 40 poles to a Spanish oak, thence N 7 E 44 to a small white oak, thence N 83 E 14 poles to a black oak, thence N 82 E 38 poles to a stone in Dudley Newcom's line; thence with said line S 64 poles to a hickory thence N 70 E 58 poles to a stone on the Belles-Mines road, thence with said road S 2 E 49 poles, thence S 16 E 13 poles and S 21 E 9 poles to a stone near an old barn, thence S 70 W 45 poles to a stone thence to the beginning, containing 70 ½ acres by survey.

**Second Tract:**

A parcel of land lying in the county of Crittenden and State of Kentucky joins said first tract:

Beginning all the land that John L. Duncan bought from Dempsey F. Kemp on the West side of the Marion and Morganfield road opposite from the dwelling house of W. R. Sullivan bounded as follows by said road and the lands of G. T. Chandler, John Nunn and W. R. Sullivan said to contain about 14 acres.

**Parcel II**

**First Tract:**

The surface only to a certain tract of land in Crittenden County, Kentucky on the waters of Camp Creek and supposed to contain 125 acres, more or less: Corner stones have been planted to said boundary of land and agreed lines have been

staked out, but there are no calls to said land. This being a part of the same land conveyed to R.H. Duncan on the 23rd day of December, 1882 by James Wilson and wife by Deed of record in Deed Book Q at Page 391 and a part of the same land conveyed to said R.H. Duncan by Eliza V. Orr on the 7th day of January, 1886 and Deed is of record in Deed Book T at Page 388 in the Clerk's Office, Crittenden County, to which for a fuller description of said land referenced is hereby made.

**Second Tract:**

Being the remainder of a tract of land conveyed on January 7, 1886 by Elizabeth V. Orr by Deed recorded in Deed Book T at Page 388, County Clerk's Office, Crittenden County, said tract originally contained 138½ acres, but 125 acres have been previously sold, leaving 13 acres conveyed by this deed, more or less.

**Third Tract:**

Beginning at a white oak, running S 63 W 20 poles to a black gum; thence S 30½ W 56 poles to a white oak; thence S 5 W 11 poles to a double white oak; thence S 14 W 16½ poles to a white oak; thence S 12 E 13 poles to a Spanish oak; thence N 66 E 53 poles to a Spanish oak; and elm; thence N 8½ E 82 poles to a white oak and Spanish oak; thence S 88 E 51 poles to a hickory and two Spanish oaks; thence N 6 E 29 poles to a white oak; thence N 5 W 13½ poles to a white oak; thence West 56 poles to two dogwoods; thence S 6 W 39 poles to the beginning, containing 35 acres and 90 poles.

There is excepted from the Third Tract a certain tract containing approximately 20 aces, more or less, which was sold by Alvis O'Neal and wife, Marjorie O'Neal to Oscar Arflack by Deed recorded in Deed Book 89 at Page 322 in the Crittenden County Clerk's Office.

The mineral and mining rights to the above described property have been previously reserved.

**SOURCE OF TITLE:**

Being the same property conveyed to Harold Keith Chandler by Rudolph Chandler and his wife, Mary K. Chandler, by Deed dated the 28th day of August, 1997 and of record in Deed Book 178 at Page 631 in the Crittenden County Clerk's Office.

Parcel I also being the same property conveyed to Rudolph Chandler by Lona McCollum, et al, by Deed dated the 10th day of September, 1960 and of record in Deed Book 97 at Page 181 in the Crittenden County Clerk's Office.

Parcel II also being the same property conveyed to Rudolph Chandler and his wife, Mary K. Chandler, by Nathan Payton and his wife, Annie Payton, by Deed dated the 28th day of February, 1959 and of record in Deed Book 90 at Page 83 in the Crittenden County Clerk's Office.

7. The heir of the Estate of Harold Keith Chandler is Peyton Fish, said estate to be held in trust for him with Randy Fish serving as Trustee. Peyton and Randy Fish reside at 620 Pike Street, Uniontown, Union County, Kentucky 42461.

8. The Executor of the Estate of Harold Keith Chandler is William Robinson, residing at 2816 Wilson Station Road, Henderson, Henderson County, Kentucky 42420.

AS GROUNDS for this Motion, the Kentucky Supreme Court rendered a decision denying discretionary review of the Kentucky Court of Appeals decision upholding the Will of Harold Keith Chandler. This ruling ends the protracted litigation regarding Keith's Will and allows Petitioners to move forward with probating Keith's estate according to his wishes.

Towards that end, it will be necessary to enter and inspect the decedent's real property. The Estate also anticipates the possibility of timbering and selling the real estate in conjunction with settling the estate. While Keith's will grants the power to sell the property, the Estate would ask the Court to take judicial notice of the history of this action, the Will Contest Action filed in the Crittenden Circuit Court, and the late contest of the probate action of Mary Katherine Chandler. Every step of the process in defending Keith's will and probating his estate has been needlessly litigious and acrimonious.

To protect the Executor, the Beneficiaries (both the Trustee and Heir), and their appraisers, real estate agents, and all others who may be involved with the inspection, timbering, and sale of the property, the Estate requests this Court enter an Order

authorizing the entry, inspection, timbering, sale and all other actions incident thereto of the decedent's real estate.

Respectfully submitted,

Megan D. Randolph
Attorney for the Estate of
Harold Keith Chandler

MOORE & WALLACE
110 South Court Street
P.O. Box 210
Morganfield, KY 42437-0210
Phone: (270) 389-1200

**NOTICE**

PLEASE TAKE NOTICE that the foregoing Motion shall be brought on for hearing before the Hon. Daniel M. Heady, Judge, Crittenden District Probate Court, Courthouse, Marion, Kentucky, on the 30th day of May, 2018 at the hour of 9:00 a.m., or as soon thereafter as counsel may be heard.

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing Motion has been served upon all parties by mailing a true and correct copy thereof to:

William Robinson, 2816 Wilson Station Road, Henderson, KY 42420;

Melissa Guill, Clerk of Crittenden District Court, 202 Courthouse, 107 South Main Street, Marion, KY 42064 (also by fax); and

Hon. Daniel Heady, Crittenden District Judge, P O Box 289, Dixon, KY 42409.

On this 25th day of May, 2018.

Megan D. Randolph

# THE LAW OFFICES OF STEVEN D. DOWNEY
ATTORNEY AT LAW
537 EAST TENTH STREET
POST OFFICE BOX 3250
BOWLING GREEN, KENTUCKY 42102-3250
TELEPHONE: 270-782-3580
FAX: 270-964-0011
*e-mail address: sdowney@sdowneylaw.com*
*www.downeylawoffice.com*

STEVEN D. DOWNEY, NBTA CERTIFIED


May 29, 2018

William Robinson, Executor, Estate of Keith Chandler
2816 Wilson Station Road
Henderson, KY 42420

*Statement for Professional Services*
*Steve Chandler v. William Robinson*

Fees:

| | | |
|---|---|---|
| 5/6/14 | Receipt and review of Motion for Avowal | .2 |
| 5/7/14 | Preparation of response to Motion for Avowal | 1.3 |
| 5/8/14 | Travel to and from Marion; preparation for and attendance at hearing; wait for Judge; will have to return another day to argue case! | 7.0 |
| 5/28/14 | Travel to and from Marion for Avowal hearing; court did not make decision; must be briefed by Wednesday | 8.0 |
| 6/2/14 | Review of Megan's research; review Powell's Amended Avowal Proffer | .2 |
| 6/4/14 | Prepare specific objections to Avowal and prepare Order to tender to Court | 4.1 |
| 6/5/14 | Finalize Order to be tendered to the Court | 1.5 |

FILED 5/30/18
CRITTENDEN CIRCUIT/
DISTRICT COURT
MELISSA GUILL, CLERK
cc/pc

| | | |
|---|---|---|
| 7/1/14 | Receipt and review of Notice of Appeal with docket sheet attached; review of docket sheet revealed Order regarding Avowal and Motion Regarding Supersedeas Bond; requested copies from the Court; teleconference with Brucie Moore regarding appeal; letter to clients regarding appeal and Motion for Supersedeas Bond | .7 |
| 7/1/14 | Letter to William Robinson and Randy Fish enclosing Judgment, Avowal Order, Notice of Appeal, Motion to Set Supersedeas Bond; brought up to date on the Appeal; receipt and review Designation of Record Appeal; teleconference with Clerk regarding same | .3 |
| 7/10/14 | Receipt and review of Notice of Deficiency of Appellant's Prehearing Statement | .1 |
| 7/25/14 | Receipt and review of Appellant's Motion to Supplement Record on Appeal | .2 |
| 7/28/14 | Response to Appellant's Motion to Supplement Record on Appeal | .3 |
| 8/13/14 | Receipt and review of Plaintiff Chandler's Reply regarding Supplementing Record; Preparation of objection to filing reply regarding supplementing record; receipt and review order disallowing pleading; receipt and review of Motion for Leave to File Reply; email to Kevin Burke with details for his response | .7 |
| 8/15/14 | Receipt and review of Order in Appeal placing case in abeyance pending ruling from Circuit Court regarding supplementing record on appeal | .1 |
| 9/5/14 | Preparation of Response in Crittenden Circuit Court to Motion to Supplement Record on Appeal | .2 |
| 9/8/14 | Receipt of Reply to Defendant's Response to Motion to Supplement Record on Appeal | .1 |
| 9/10/14 | Preparation of Sur-Reply to Plaintiff's Reply to Motion to Supplement Record on Appeal in Circuit case | .2 |

| | | |
|---|---|---|
| 9/29/14 | Receipt and review of Appellant's Motion to Continue Abatement Period | .1 |
| 10/20/14 | Receipt and review of Order from Court of Appeals Granting Motion to Continue Abatement Period | .1 |
| 12/19/14 | Receipt and review of Order Denying Plaintiff Chandler's Motion to Supplement Record; preparation of Motion to Return Appeal to Active docket | .2 |
| 12/30/14 | Receipt and review of Notification of Trial Court's Ruling on Appellant's Motion to Supplement the Record; receipt and review of Plaintiff's Motion for Permission to Amend Notice of Appeal; teleconference with Kevin Burke; finalize responses to motions | .3 |
| 1/12/15 | Receipt and review of Appellant's Motion to File in Excess of Pages Allowed with lengthy memorandum; teleconference with Kevin Burke regarding preparing response | .2 |
| 1/19/15 | Receipt and review of Appellant's Motion for Leave to File a Reply regarding Supplemental Motion to Supplement Record; teleconference with Kevin Burke concerning same | .2 |
| 1/26/15 | Receipt and review of Appellant's Motion to Strike Appellee's response; teleconference with Kevin Burke regarding same | .4 |
| 2/2/15 | Preparation of Combined Response to Appellant's Motion to Strike | .8 |
| 6/2/15 | Receipt and review of Appellant's Motion for Clarification; teleconferences with Keven Burke regarding same | .5 |
| 7/17/15 | Preparation of Response to Motion for Extension of Time | .5 |

| | | |
|---|---|---|
| 7/27/15 | Receipt and review of Notice of Deficient Pleading (brief); we have **not** received our copy; email to Kevin Burke regarding same | .2 |
| 7/27/15 | Receipt and review of email from Kayce Powell's associate asking for 60 day continuance regarding filing brief; response to same and email both to Kevin Burke; receipt and review of his response | .3 |
| 8/11/15 | Preparation of Response to second Motion for Extension of Time to File Brief and Response to Motion for Extension to File Notice of Appeal | 1.0 |
| 8/21/15 | Receipt and review of Steve Chandler's Motion for Permission to File Reply to our Response regarding extending time; preparation of response to same | 1.5 |
| 9/4/15 | Receipt and review of pleadings in Court of Appeals and District Court (probate) | .2 |
| 9/8/15 | Receipt of brief; efforts to see if filed | .3 |
| 9/9/15 | Teleconference with Clerk from Court of Appeals; trying to straighten out confusion; prepare Motion to Consolidate and Entry of Appearance regarding Mary Katherine's Estate's Motion for Discretionary Review | 1.5 |
| 9/10/15 | Prepare Entry of Appearance and Motion to Dismiss one or consolidate both cases regarding Mary Katherine Estate's Motion for Discretionary Review | .6 |
| 9/11/15 | Teleconference with Kevin Burke regarding lack of jurisdiction and Powell's failure to pay filing fee timely and issue concerning two case filings | .5 |
| 11/2/15 | Draft of counterstatement | 1.0 |
| 11/3/15 | Draft of counterstatement | 3.2 |
| 11/4/15 | Draft of counterstatement | 2.4 |
| 12/4/15 | Draft of counterstatement | 3.0 |

| | | |
|---|---|---|
| 12/7/15 | Teleconference with Kevin Burke regarding brief | .5 |
| 12/8/15 | Review Appellant brief; teleconference with Kevin Burke regarding our brief in response | 2.7 |
| 12/9/15 | Draft brief | 4.5 |
| 12/10/15 | Draft brief | 6.0 |
| 12/16/15 | Draft brief | 1.6 |
| 12/17/15 | Draft brief | 3.0 |
| 12/18/15 | Final edit of counterstatement; teleconference with Kevin Burke and final edit of argument | 2.3 |
| 1/15/16 | Receipt and review of Appellant's Reply Brief and Motion to file excess pages | .7 |
| 3/25/16 | Preparation of Motion to Strike Appellant's Reply Brief | 1.1 |
| 3/28/16 | Review of Reply Brief tendered in preparation for discussion with Kevin Burke | .5 |
| 4/27/16 | Preparation of Response to Motion for Leave to File Late Response to Motion to Strike | .3 |
| 9/29/16 | Receipt and review of Chandler's Objection to Proposed Panel; teleconference with Kevin Burke | 1.0 |
| 10/5/16 | Review Objection to Panel; review responsive pleading; finalize | 2.0 |
| 3/22/17 | Preparation of Response in Opposition to Petition for Rehearing | .7 |
| 11/16/17 | Receipt and review of Order Denying Petition for Rehearing | .2 |
| 1/15/18 | Receipt and review of Steve Chandler's Motion for Discretionary Review | .6 |

| | | |
|---|---|---|
| 1/23/18 | Receipt and review of Steve Chandler's revised Motion for Discretionary Review | .2 |
| 2/12/18 | Draft Response to Motion for Discretionary Review | .4 |
| 2/14/18 | Finalize Response to Motion for Discretionary Review | 1.9 |
| 4/20/18 | Receipt and review of Order Denying Motion for Discretionary Review | .2 |
| | *Total Hours* | *74.6* |
| | *Hourly Rate* | *225.00* |
| | *Total Fees* | *$16,785.00* |

Expenses:

| | | |
|---|---|---|
| 5/8/14 | Travel to and from Marion for hearing | 140.00 |
| 5/28/14 | Travel to and from Marion for hearing | 140.00 |
| 7/2/14 | Crittenden Circuit Court Clerk – complete trial and hearing video | 42.50 |
| 7/28/14 | Federal Express | 20.20 |
| 1/22/15 | Federal Express – overnight to Court of Appeals on 1/5/15 | 24.61 |
| 1/23/15 | Kevin Burke – fees | 2,137.50 |
| 1/28/15 | Postmaster – packages to Robinson and Fish | 11.99 |
| 1/16/15 | Federal Express – overnight to Court of Appeals | 20.80 |
| 1/20/15 | Federal Express – overnight to Court of Appeals | 20.80 |
| 2/2/15 | Federal Express – overnight to Court of Appeals | 20.60 |
| 4/6/15 | Crittenden Circuit Court Clerk – copy of probate file/DVD of hearing | 37.25 |
| 6/8/15 | Federal Express – overnight to clerk | 20.50 |
| 7/17/15 | Federal Express – overnight to clerk | 20.70 |

| | | |
|---|---|---|
| 8/14/15 | Federal Express – overnight to clerk | 20.50 |
| 8/24/15 | Federal Express – overnight to clerk | 20.50 |
| 9/10/15 | **LOC** – Kevin Burke – appeal fees | 792.50 |
| 9/10/15 | Federal Express – overnight to clerk | 15.05 |
| 11/10/15 | Federal Express – overnight to clerk | 20.45 |
| 12/22/15 | Postmaster – briefs | 17.82 |
| 12/22/15 | Federal Express – overnight to clerk | 25.75 |
| 1/4/16 | **LOC** – Kevin Burke – appeal brief | 6,112.50 |
| 2/8/16 | **LOC** – Kevin Burke – appeal work | 562.50 |
| 1/26/16 | Federal Express – overnight to clerk | 21.75 |
| 4/8/16 | Kevin Burke – appeal work | 712.50 |
| 4/21/16 | Federal Express – overnight to COA | 23.83 |
| 4/27/16 | Federal Express – overnight to COA | 21.27 |
| 5/5/16 | **LOC** – Kevin Burke – appeal work | 675.00 |
| 10/03/16 | Federal Express – overnight to COA | 50.77 |
| 11/3/16 | **LOC** – Kevin Burke – appeal work | 300.00 |
| 3/22/17 | Postmaster – response to petition for rehearing | 2.80 |
| 3/22/17 | Federal Express – overnight to COA | 25.39 |
| 5/3/17 | **LOC** – Burke Neal – appeal work | 450.00 |
| 10/3/17 | Federal Express – overnight to clerk | 22.99 |
| 12/7/17 | **LOC** – Burke Neal – appeal work | 487.50 |
| 2/15/18 | Copies of Response to MDR – 162 pages x 16 copies = 2,592 | 259.20 |

| | | |
|---|---|---|
| 2/15/18 | Federal Express – overnight response to MDR | 64.36 |
| 2/15/18 | Postmaster – response to MDR | 36.70 |
| 3/22/18 | **LOC** – Kevin Burke – response to MDR | 2,512.50 |
| 5/15/18 | Refund Clerk | (10.00) |
| | *Total Expenses* | *$15,901.58* |

Retainer:

| | | |
|---|---|---|
| 5/16/14 | Retainer | 5,000.00 |
| | *Total Payments* | *$5,000.00* |
| | *Total Fees* | *$16,785.00* |
| | *Total Expenses* | *15,901.58* |
| | *Total Fees and Expenses* | *$32,686.58* |
| | *Less, Payments* | *(5,000.00)* |
| | ***Total Amount Due and Owing*** | ***$27,686.58*** |

cc: Brucie Moore, Esq.

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER, deceased
DOD: 07/05/2011

## ITEMIZATION OF HOURS

Probate Case

| | | |
|---|---|---|
| July 11, 2011 | Petition to Probate Will Prepared | 1.0 hr |
| July 12, 2011 | Petition to Probate Will filed | .25 hr |
| July 13, 2011 | Order Appointing Temporary Executor Entered<br>Preparation | .5 hr<br>.5 hr |
| July 13, 2011 | Court Appearance | 2.0 hr |
| July 13, 2011 | Bank Work to determine assets | 2.0 hr |
| July 13, 2011 | Visit home | 1.0 hr |
| July 13, 2011 | Receive & Review Account Statement—Integra Bank | .5 hr |
| July 15, 2011 | Will filed | .5 hr |
| July 15, 2011 | Notice of Filing and Motion to Set Aside Temporary Order | .5 hr |
| July 15, 2011 | Receive & Review Motion to Contest Probate of Will | .5 hr |
| July 18, 2011 | Receive & Review Address Change—The People's Bank | .25 hr |
| July 20, 2011 | Court Appearance | 2.0 hr |
| July 20, 2011 | Order Appointing Executor Entered<br>Preparation | .25 hr<br>.5 hr |
| July 26, 2011 | Receive & Review Motion to Withdraw (RBFrazer) | .25 hr |
| August 3, 2011 | EIN requested | .75 hr |

| | | |
|---|---|---|
| August 4, 2011 | Letter to Rayloc HR | .25 hr |
| August 5, 2011 | Prepare Deposit Estate Account | .5 hr |
| August 11, 2011 | Receive & Review Order to Withdraw (RBFrazer) | .25 hr |
| August 17, 2011 | Receive & Review Fax from Rayloc | .25 hr |
| August 19, 2011 | Receive & Review bank statements (from William Robinson) | .75 hr |
| August 31, 2011 | Email to Lovern Appraisal re: appraisal on property | .25 hr |
| September 8, 2011 | Receive & Review Appraisal | 1.0 hr |
| September 16, 2011 | Letter to William Robinson re: Inventory | .25 hr |
| September 20, 2011 | Letter to GPC Employee Service Center | .25 hr |
| September 20, 2011 | Letter to GPC Retirement Plan Services | .25 hr |
| September 20, 2011 | Letter to AGLA | .25 hr |
| September 22, 2011 | Inventory Filed<br>Preparation | .25 hr<br>1.5 hr |
| September 29, 2011 | Receive & Review Letter from AGLA | .25 hr |
| October 3, 2011 | Letter to GPC Retirement Plan Services | .25 hr |
| October 5, 2011 | Receive & Review Letter from AGLA | .25 hr |
| October 13, 2011 | Receive & Review Order Staying District Court Proceedings | .25 hr |
| October 20, 2011 | Letter to AGLA | .25 hr |
| October 24, 2011 | Receive & Review Letter from Genuine Parts Company | .25 hr |
| October 25, 2011 | Receive & Review Letter from AGLA | .25 hr |
| October 28, 2011 | Receive & Review payment AGLA | .25 hr |
| November 1, 2012 | Letter to Kentucky Department of Revenue<br>re: Inheritance Tax Penalty | 1.5 hr |

| | | |
|---|---|---|
| May 1, 2013 | Letter to Kentucky Department of Revenue re: Inheritance Tax Penalty | 1.0 hr |
| May 19, 2014 | Letter to GPC Retirement Plan Services | .25 hr |
| May 21, 2014 | Receive & Review Petition/Motion to Reopen the Probate Estate of Mary Katherine Chandler | .5 hr |
| May 28, 2014 | Court Appearance [Re-Opening Mary Katherine Chandler's Estate] | .5 hr |
| May 28, 2014 | Court Appearance [review] | .5 hr |
| June 16, 2014 | Receive & Review Notice of Appeal and Motion for Supersedas Bond in Circuit Court Case | .5 hr |
| June 18, 2014 | Court Appearance [MKC Estate re-opening] | 1.0 hr |
| June 18, 2014 | Court Appearance [review] | .5 hr |
| June 18, 2014 | Response of the Estate to Petition/Motion to Reopen Estate<br>Preparation | .25 hr<br>12.0 hr |
| July 16, 2014 | Motion for Executor's Fee | 1.0 hr |
| January 5, 2015 | Case Update | .5 hr |
| January 16-20, 2015 | Appeal Issue; Motion for Executor Fee | 1.0 hr |
| January 26-27, 2015 | Response to Subpoenas (Circuit Criminal) | 1.0 hr |
| February 12, 2015 | Letter to Kentucky Department of Revenue Inheritance Tax and Update | 1.0 hr |
| February 17, 2015 | Review Probate Order | .25 hr |
| March 6, 2015 | Receive/Review Notice of Appeal<br>Review Law and Requirements | 1.0 hr |
| March 10-12, 2015 | Bank Statements/Retirement Funds Work | 1.25 hr |
| March 16, 2015 | Receive/Review Notice of Appeal | 1.5 hr |

| | | |
|---|---|---|
| March 17, 2015 | Counterstatement of Appeal Work | .5 hr |
| March 23, 2015 | Counterstatement of Appeal Work | 1.0 hr |
| March 24, 2015 | Counterstatement of Appeal Work | 2.5 hr |
| March 26, 2015 | Finish Counterstatement of Appeal<br>Print & Mail | 3.0 hr |
| April 3, 2015 | Receive & Review Motion for Accounting | .5 hr |
| April 7, 2015 | Begin Work on Accounting | 4.0 hr |
| April 8, 2015 | Work on Accounting | .5 hr |
| April 9, 2015 | Work on Accounting | 3.0 hr |
| April 10, 2015 | Work on Accounting | 2.5 hr |
| April 14, 2015 | Work on Accounting | .5 hr |
| April 22, 2015 | Accounting | 1.0 hr |
| April 29, 2015 | Court Appearance | 2.5 hr |
| June 2, 2015 | Accounting | 1.0 hr |
| June 8, 2015 | Accounting | .5 hr |
| June 10, 2015 | Periodic Settlement | 1.0 hr |
| July 22, 2015 | Receive & Review Exceptions to Periodic Settlement | .5 hr |
| July 23, 2015 | Response to Exceptions | 4.0 hr |
| July 24, 2015 | Response to Exceptions | 4.0 hr |
| July 27, 2015 | Response to Exceptions | 4.0 hr |
| July 28, 2015 | Response to Exceptions | 4.0 hr |
| July 29, 2015 | Response to Exceptions | 2.0 hr |
| August 18, 2015 | Response to Exceptions | .5 hr |

| | | |
|---|---|---|
| August 24, 2015 | Accounting | 1.0 hr |
| August 25, 2015 | Accounting & Exceptions | 2.5 hr |
| August 26, 2015 | Court Appearance | 1.0 hr |
| August 27, 2015 | Case Review, Motion to Strike Response | 2.0 hr |
| August 28, 2015 | Motion to Strike Response | 1.0 hr |
| August 31, 2015 | Sur-Reply Accounting | 1.0 hr |
| September 7, 2015 | Sur-Reply Accounting | 6.0 hr |
| September 9, 2015 | Sur-Reply Accounting | 1.5 hr |
| September 18, 2015 | Response to Motion for Discretionary Review | 5.0 hr |
| September 23, 2015 | Response to Motion for Discretionary Review | 1.0 hr |
| October 2, 2105 | Court Record & Paperwork Review | 1.0 hr |
| November 12, 2015 | Periodic Accounting | 2.0 hr |
| November 30, 2015 | Periodic Accounting | .25 hr |
| December 4, 2015 | Periodic Accounting | 1.0 hr |
| January 6, 2016 | Letter to Kentucky Department of Revenue Inheritance Tax and Update | 1.0 hr |
| January 26, 2016 | Reply Brief | 1.5 hr |
| March 8, 2016 | Response to Motion for Discretionary Review | 3.0 hr |
| March 10, 2016 | Response to Motion for Discretionary Review | 2.0 hr |
| March 11, 2016 | Response to Motion for Discretionary Review | 2.0 hr |
| June 6, 2016 | Periodic Settlement | 2.5 hr |
| December 7, 2016 | Periodic Settlement | 2.5 hr |
| January 3, 2017 | Letter to Kentucky Department of Revenue | 1.0 hr |

| | | |
|---|---|---|
| | Inheritance Tax and Update | |
| December 4, 2017 | Letter to Kentucky Department of Revenue<br>Inheritance Tax and Update | 1.0 hr |
| Total Hours through January 1, 2018 | | 139 hours |

COMMONWEALTH OF KENTUCKY
CRITTENDEN DISTRICT COURT
PROBATE DIVISION
Case No. 11-P-00050

IN RE: ESTATE OF HAROLD KEITH CHANDLER, deceased
DOD: 07/09/2011

## ITEMIZATION OF HOURS

Will Contest Case

| | | |
|---|---|---|
| October 13, 2011 | Receive & Review Notice & Will Contest Complaint | 1.5 hr |
| October 20, 2011 | Meeting with Clients | 2.5 hr |
| November 4, 2011 | Motion to Dismiss and Motion to Strike Preparation | .25 hr<br>12.5 hr |
| November 23, 2011 | Receive & Review Response to Motion to Strike & Plaintiff's Motion to Strike | 1.0 hr |
| December 8, 2011 | Court Appearance [Motion to Strike] | 2.5 hr |
| December 13, 2011 | Receive & Review Email from Kayce Powell re: delay | .25 hr |
| December 21, 2011 | Receive & review Email re: delay | .25 hr |
| December 22, 2011 | Receive & Review Email re: delay | .25 hr |
| January 6, 2012 | Receive & Review Email re: memorandum | .25 hr |
| January 6, 2012 | Receive & Review Memorandum in Opposition to Defendants Motion to Strike | 1.0 hr |
| January 6, 2012 | Memorandum in Support of Defendants' Motion Preparation | .25 hr<br>4.0 hr |
| January 13, 2012 | Receive & Review Email re: response to memorandum | .25 hr |
| January 16, 2012 | Receive & Review Email re: response to memorandum | .25 hr |
| January 17, 2012 | Email to Kayce Powell re: representation | .25 hr |

| | | |
|---|---|---|
| January 18, 2012 | Receive & Review Email from Kayce Powell re: representation | .25 hr |
| January 19, 2012 | Receive & Review Response to Defendants' Memorandum in Support | .5 hr |
| April 17, 2012 | Receive & Review Order on Defendants' Motion to Strike | 1.0 hr |
| April 20, 2012 | Receive & Review Plaintiff's Objection to Order on Motion to Strike | .5 hr |
| May 6, 2012 | Answer and Counterclaim<br>Preparation | .25 hr<br>5.0 hr |
| May 17, 2012 | Receive & Review Motion to Dismiss Counterclaim | .5 hr |
| June 14, 2012 | Court Appearance [Motion to Dismiss Counterclaim] | 2.5 hr |
| July 13, 2012 | Memorandum in Opposition to Plaintiff's Motion to Dismiss<br>Preparation | .25 hr<br>8.0 hr |
| July 16, 2012 | Receive & Review Email from Kayce Powell re: delay | .25 hr |
| July 16, 2012 | Email to Kayce Powell re: delay | .25 hr |
| July 17, 2012 | Defendants Interrogatories Propounded to Plaintiff<br>Preparation | .25 hr<br>2.0 hr |
| July 17, 2012 | Requests for Admissions<br>Preparation | .25 hr<br>1.0 hr |
| July 23, 2012 | Receive & Review email from Kayce Powell | .25 hr |
| July 23, 2012 | Receive & Review Memorandum in Support of Plaintiff's Motion to Dismiss Counterclaim | .75 hr |
| August 13, 2012 | Receive & Review Order on Plaintiff's Objection to Order on Motion to Strike | .25 hr |
| August 13, 2012 | Receive & Review Order on Plaintiff's Motion to Dismiss Counterclaim | .5 hr |
| August 19, 2012 | Receive & Review Plaintiff's Answers to Interrogatories Propounded by the Defendants | 2.5 hr |

| | | |
|---|---|---|
| August 19, 2012 | Receive & Review Answer to Defendants Request for Admission | 1.0 hr |
| August 24, 2012 | Receive & Review Plaintiff's Interrogatories Propounded to Defendants | 1.0 hr |
| September 10, 2012 | Meeting with Clients | 2.5 hr |
| September 18, 2012 | Deposition of Phillip Clements<br>Preparation | 1.5 hr<br>2.0 hr |
| September 21, 2012 | Defendants' Answers to Interrogatories Propounded by Plaintiff<br>Preparation | .25 hr<br>6.0 hr |
| October 1, 2012 | Authorization re: employment records (Randy Fish) | .5 hr |
| October 1, 2012 | Letter to Rayloc re: Randy Fish personnel file | .25 hr |
| October 31, 2012 | Receive & Review Invoice Collins Court Reporting Deposition of Phillip Clements | .25 hr |
| November 5, 2012 | Receive & Review Motion to Make Emails Part of the Record | .25 hr |
| November 9, 2012 | Receive & Review Motion to Make Emails Part of the Record (amended motion, date change) | .25 hr |
| November 12, 2012 | Receive & Review Notice of Deposition [Rayloc Human Resources Manager-Randy Fish] | .25 hr |
| November 12, 2012 | Receive & Review Notice of Deposition [Rayloc Human Resources Manager-Harold Keith Chandler] | .25 hr |
| November 19, 2012 | Receive & Review Notice of Deposition [Accounts Manager Integra Bank] | .25 hr |
| November 19, 2012 | Receive & Review Notice of Deposition [The People's Bank] | .25 hr |
| November 19, 2012 | Receive & Review Notice of Deposition [Accounts Record Manager Fifth Third Bank] | .25 hr |
| November 19, 2012 | Receive & Review Notice of Deposition [AT&T Subpoena Center] | .25 hr |

| | | |
|---|---|---|
| December 13, 2012 | Court Appearance | 2.5 hr |
| December 17, 2012 | Receive & Review Scheduling Order/Calendar Dates | 1.0 hr |
| January 8, 2013 | Email to Kayce Powell re: discovery requests | .25 hr |
| January 10, 2013 | Draft Order re: discovery | .75 hr |
| January 10, 2013 | Letter to Clerk re: Order | .25 hr |
| January 22, 2013 | Receive & Review Email from Kayce Powell re: discovery requests | .25 hr |
| February 4, 2013 | Receive & Review Order [production of documents] | .25 hr |
| February 14, 2013 | Receive & Review Notice of Deposition [Accounts Record Manager Division of Unemployment Insurance] | .25 hr |
| February 25, 2013 | Letter to Kayce Powell re: depositions | .25 hr |
| February 25, 2013 | Receive & Review Objection to Subpoena | .5 hr |
| February 28, 2013 | Notice of Deposition of Karen Stone | .5 hr |
| February 28, 2013 | Notice of Deposition of Rebecca Johnson | .5 hr |
| February 28, 2013 | Letter to Kayce Powell re: deposition of Johnson & Stone | .25 hr |
| March 5, 2013 | Letter to Kayce Powell re: depositions | .25 hr |
| March 6, 2013 | Receive & Review Letter from Kayce Powell re: deposition of Newcom & McDowell | .25 hr |
| March 11, 2013 | Notice of Deposition of Elwanda McDowell | .5 hr |
| March 11, 2013 | Notice of Deposition of Aubrey Glenn Newcom | .5 hr |
| March 18, 2013 | Receipt of Documents Preparation | 5.0 hr |
| March 18, 2013 | Letter to Kayce Powell re: receipt of documents | .25 hr |
| March 18, 2013 | Letter to Clients re: update | .5 hr |
| March 25, 2013 | Deposition of Aubrey Glenn Newcom | 2.0 hr |

| | | |
|---|---|---|
| | Preparation/Review | 2.0 hr |
| March 25, 2013 | Deposition of Elwanda McDowell<br>Preparation/Review | .75 hr<br>1.0 hr |
| March 27, 2013 | Receive & Review Invoice from Collins Court Reporting<br>Depositions of Aubrey G Newcom & Elwanda McDowell | .25 hr |
| April 22, 2013 | Deposition of Rebecca Johnson<br>Preparation/Review | .5 hr<br>1.0 hr |
| April 22, 2013 | Deposition of Karen Stone<br>Preparation/Review | .5 hr<br>.5 hr |
| April 26, 2013 | Receive & Review Invoice Collins Court Reporting<br>Depositions of Karen Stone & Rebecca J Johnson | .25 hr |
| June 5, 2013 | Receive & Review Motion for Recusal | .25 hr |
| June 10, 2013 | Notice of Deposition of Steve Chandler | .5 hr |
| June 11, 2013 | Response to Plaintiff's Motion for Recusal<br>Preparation | .25 hr<br>2.5 hr |
| June 13, 2013 | Receive & Review Memorandum in Support of<br>Motion to Recuse | .5 hr |
| June 13, 2013 | Court Appearance [Motion to Recuse] | 2.5 hr |
| June 24, 2013 | Letter to Clients re: depositions | .25 hr |
| June 24, 2013 | Re-Notice of Deposition of Steve Chandler | .5 hr |
| July 1, 2013 | Letter to Kayce Powell re: depositions<br>of Randy Fish & William Robinson | .25 hr |
| July 2, 2013 | Receive & Review Letter from Kayce Powell re: depositions<br>of Randy Fish & William Robinson | .25 hr |
| July 3, 2013 | Prepare Subpoena Duces Tecum for Steve Chandler | .25 hr |
| July 15, 2013 | Deposition of Steve Chandler<br>Preparation/Review | 2.5 hr<br>6.0 hr |

| | | |
|---|---|---|
| July 15, 2013 | Letter to Kayce Powell re: depositions of William Robinson and Randy Fish | .25 hr |
| July 17, 2013 | Notice of Deposition of Jo Robinson | .5 hr |
| July 17, 2013 | Receive & Review Notice of Deposition of Randy Fish | .25 hr |
| July 17, 2013 | Receive & Review Notice of Deposition of William Robinson | .25 hr |
| July 24, 2013 | Deposition of Randy Fish<br>Preparation/Review | 1.5 hr<br>8.0 hr |
| July 24, 2013 | Deposition of William Robinson<br>Preparation/Review | .75 hr<br>2.0 hr |
| July 24, 2013 | Deposition of Jo Robinson<br>Preparation/Review | .5 hr<br>.5 hr |
| September 9, 2013 | List of Witnesses<br>Preparation | .25 hr<br>1.0 hr |
| September 9, 2013 | List of Exhibits<br>Preparation | .25 hr<br>1.0 hr |
| September 19, 2013 | Receive & Review Invoice from Collins Court Reporting Deposition of Steve Chandler | .25 hr |
| September 20, 2013 | Receive & Review List of Witnesses | .5 hr |
| September 20, 2013 | Receive & Review List of Exhibits | .5 hr |
| September 25, 2013 | Letter to Kayce Powell re: failure to provide discovery | .5 hr |
| September 26, 2013 | Receive & Review Invoice from Collins Court Reporting Depositions of Randy Fish, William Robinson, & Jo Robinson | .25 hr |
| September 26, 2013 | Receive & Review telephone records of Keith Chandler | 3.0 hr |
| September 26, 2013 | Letter to Kayce Powell re: receipt of telephone records | .25 hr |
| September 27, 2013 | Notice of Deposition of Melinda McManess | .5 hr |
| September 27, 2013 | Notice of Deposition of Dawn Travis | .5 hr |

| | | |
|---|---|---|
| September 27, 2013 | Prepare Subpoenas | .25 hr |
| September 27, 2013 | Letter to Crittenden Clerk re: subpoenas | .25 hr |
| September 27, 2013 | Letter to Crittenden Sheriff re: subpoenas | .25 hr |
| September 27, 2013 | Letter to Clients re: Plaintiff's Witness & Exhibit Lists | .5 hr |
| September 27, 2013 | Motion to Compel Discovery<br>Preparation | .25 hr<br>.5 hr |
| September 30, 2013 | Letter to Kayce Powell re: depositions of Dawn Travis & Melinda McManess | .25 hr |
| October 1, 2013 | Receive & Review Letter from Kayce Powell re: depositions of Dawn Travis & Melinda McManess | .25 hr |
| October 1, 2013 | Letter to Kayce Powell re: depositions of Dawn Travis & Melinda McManess | .25 hr |
| October 3, 2013 | Receive & Review Motion to Extend Time for Discovery | .25 hr |
| October 9, 2013 | Receive & Review Response to Motion to Compel | .5 hr |
| October 10, 2013 | Receive & Review Order (Motion for Recusal & Motion to Compel) | .5 hr |
| October 15, 2013 | Deposition of Dawn Travis<br>Preparation/Review | 1.0 hr<br>.75 hr |
| October 21, 2013 | Receive & Review Invoice Collins Court Reporting Deposition of Dawn Travis | .25 hr |
| November 14, 2013 | Court Appearance [Pre-Trial Conference] | 2.5 hr |
| December 2, 2013 | Trial Brief<br>Preparation | .25 hr<br>12.0 hr |
| December 9, 2013 | Receive & Review Motion to Strike Trial Brief | .25 hr |
| December 9, 2013 | Receive & Review Motion for Recusal Pursuant to KRS 26A.020 | .75 hr |
| December 18, 2013 | Receive & Review Calendar Order (Dec 12, 2013) | .25 hr |

| | | |
|---|---|---|
| January 10, 2014 | Receive & Review Order Denying Motion for Disqualification | .25 hr |
| January 16, 2014 | Receive & Review Order on Motion to Strike Trial Brief | .25 hr |
| January 16, 2014 | Receive & Review Amended Scheduling Order | .25 hr |
| January 21, 2014 | Motion for Summary Judgment (and Memorandum)<br>Preparation | .25 hr<br>20.0 hr |
| January 21, 2014 | Affidavit of Brucie W. Moore | 1.0 hr |
| February 12, 2014 | Receive & Review Motion to Amend<br>Previously Filed Witness List | .5 hr |
| February 13, 2014 | Receive & Review Response to Defendants Request | .25 hr |
| February 17, 2014 | Receive & Review Response to Motion for Summary Judgment (and Memorandum) | 3.0 hr |
| February 26, 2014 | Letter to Judge Williams re: Reply to Plaintiff's Memorandum | .25 hr |
| February 26, 2014 | Reply to Memorandum in Opposition of Summary Judgment<br>Preparation | .25 hr<br>8.0 hr |
| February 27, 2014 | Letter to Clients re: update | .75 hr |
| March 6, 2014 | Receive & Review Order on Summary Judgment | 1.0 hr |
| March 13, 2014 | Court Appearance [Pre-Trial Conference] | 2.5 hr |
| March 13, 2014 | Motion to Prohibit Testimony re: Aspergers/Autism<br>Preparation | .25 hr<br>1.0 hr |
| March 18, 2014 | Letter to Judge Williams re: PTC April 1, 2014 | .25 hr |
| March 19, 2014 | Retrieve & Review Jury List/Juror Qualification Forms | 3.0 hr |
| March 19, 2014 | Meeting with clients | 3.0 hr |
| March 20, 2014 | Receive & Review Response to Defendants' Request to Deny Amended Witness List | .25 hr |
| March 20, 2014 | Receive & Review Plaintiff's Proposed Jury Instructions | .25 hr |

| | | |
|---|---|---|
| March 21, 2014 | Letter to Kayce Powell re: deposition of Melinda McManess | .25 hr |
| March 21, 2014 | Notice of Deposition for Melinda McManess | .5 hr |
| March 24, 2014 | Receive & Review Response to Prohibit Testimony re: Aspergers/Autism | .5 hr |
| March 27, 2014 | Meeting with Steve Downey | 6.0 hr |
| March 27, 2014 | Letter to Kayce Powell re: postponing deposition of Melinda McManess | .25 hr |
| March 27, 2014 | Receive & Review Letter re: representation [Steve Downey] | .25 hr |
| March 27, 2014 | Entry of Appearance [Steve Downey] | .25 hr |
| March 28, 2014 | Defendants Proposed Jury Instructions<br>Preparation | .25 hr<br>1.0 hr |
| March 28, 2014 | Reply to Plaintiff's Response on Defendants' Aspergers/Autism Motion<br>Preparation | .25 hr<br>3.0 hr |
| March 28, 2014 | Receive & Review Order on Motion to Amend Witness List | .5 hr |
| March 31, 2014 | Subpoena Phillip Clements | .25 hr |
| March 31, 2014 | Motion in Limine<br>Preparation | .25 hr<br>12.0 hr |
| April 1, 2014 | Motion to Exclude Internet Postings<br>Preparation | .25 hr<br>1.0 hr |
| April 1, 2014 | Offers to Stipulate<br>Preparation | .25 hr<br>1.0 hr |
| April 1, 2014 | Motion to Exclude Time Clock Entries<br>Preparation | .25 hr<br>1.0 hr |
| April 1, 2014 | Motion to Withdraw<br>Preparation | .25 hr<br>.25 hr |
| April 1, 2014 | Receive & Review Motion to Take Judicial Notice of Definition of Intellectual Disability | 1.0 hr |

| | | |
|---|---|---|
| April 1, 2014 | Court Appearance [Pre-Trial Conference] | 4.0 hr |
| April 7, 2014 | Receive & Review Order Substituting Counsel | .25 hr |
| April 7, 2014 | Response to Plaintiff's Motion in Limine to Take Judicial Notice of the Definition of Intellectual Disability | .25 hr |
| | Preparation | 6.0 hr |
| April 7, 2014 | Receive & Review Motion to Reconsider Exclusion | .5 hr |
| April 7, 2014 | Receive & Review Motion [Steffanie Shoulders] | .5 hr |
| April 7, 2014 | Receive & Review Trial Brief to Take Judicial Notice | .75 hr |
| April 7, 2014 | Receive & Review Response to Motion in Limine | .5 hr |
| April 7, 2014 | Prepare Subpoenas | 1.5 hr |
| April 9, 2014 | Response to Plaintiff's Motion re: CCHS records for Keith Chandler | .25 hr |
| | Preparation | 6.0 hr |
| April 10, 2014 | Response to Plaintiff's Motion to Reconsider | .25 hr |
| | Preparation | .75 hr |
| April 10, 2014 | Receive & Review Reply to Defendants' Response re: CCHS records | .5 hr |
| April 11, 2014 | Court Appearance [Pre-Trial Conference] | 8.0 hr |
| April 14, 2014 | Prepare Subpoenas | 1.0 hr |
| April 14, 2014 | Draft Order re: April 11, 2014 Pretrial | 8.0 hr |
| April 14, 2014 | Receive & Review Calendar Order of April 11, 2014 Pretrial | .75 hr |
| April 14, 2014 | Court Appearance-Telephonic Conference re: RJP Postings | .5 hr |
| April 16, 2014 | Receive & Review Order re: Timeframe for Evidence | .75 hr |
| April 1-21, 2014 | Trial Preparation | 75.0 hr |
| April 17, 2014 | Trial | 12.0 hr |

| | | |
|---|---|---|
| April 18, 2014 | Trial | 10.0 hr |
| April 21, 2014 | Trial | 12.0 hr |
| April 21, 2014 | Motion for Directed Verdict<br>Preparation | .25 hr<br>12.0 hr |
| April 23, 2014 | Receive & Review Motion to Make Avowal | .25 hr |
| April 25, 2014 | Judgment and Order<br>Preparation | .25 hr<br>2.5 hr |
| May 8, 2014 | Court Appearance-Avowal/Proffer | 4.0 hr |
| May 28, 2014 | Court Appearance-Avowal/Proffer | 4.0 hr |
| May 28, 2014 | Receive & Review Proffer of Excluded Evidence | 2.0 hr |
| May 30, 2014 | Receive & Review Memo in Support of Avowal | .5 hr |
| May 30, 2014 | Receive & Review Proffer of Excluded Evidence (Amended) | .75 hr |
| June 4, 2014 | Response to Plaintiff's Proffer of Excluded Evidence<br>Preparation | .25 hr<br>8.0 hr |
| June 5, 2014 | Review Order Regarding Plaintiff's Proffer to Excluded Evidence | 1.0 hr |
| June 5, 2014 | Receive & Review Reply to Defendant's Response to Plaintiff's Avowal | .75 hr |
| April 3, 2015 | Receive and Review New Complaint | 1.0 hr |
| April 6, 2015 | Review Law, New Complaint | 1.5 hr |
| April 8, 2015 | Research and Review Case, New Complaint | 1.5 hr |
| April 10, 2015 | Hearing Transcription | .5 hr |
| April 13, 2015 | Hearing Transcription | .5 hr |
| April 14, 2015 | Counterclaim Issue research & review | 1.0 hr |

| | | |
|---|---|---|
| August 3, 2015 | Receive & Review Motion for Extension | .25 hr |
| August 10, 2015 | Receive & Review Notices of Filing | .25 hr |
| October 7, 2015 | Case Notes to Steve Downey | 1.0 hr |
| October 14, 2015 | Type Day 3 Witness Testimony | 2.0 hr |
| October 16, 2015 | Type Day 3 Witness Testimony | 4.0 hr |
| October 19, 2015 | Type Day 3 Witness Testimony | 2.0 hr |
| October 20, 2015 | Type Day 3 Witness Testimony<br>Type Closing Arguments | 3.5 hr |
| October 21, 2015 | Type Day 3 Witness Testimony<br>Type Closing Arguments | 3.0 hr |
| October 23, 2015 | Type Day 3 Witness Testimony<br>Type Closing Arguments | 5.5 hr |
| December 21, 2015 | Testimony Review | 1.0 hr |
| December 23, 2015 | Review Brief | 1.0 hr |
| January 16, 2017 | Receive Order Affirming<br>Review Post Appeal Requirements | .75 hr |
| Various | Phone Calls from Clients | 25.0 hr |
| Various | Meetings with Clients | 25.0 hr |
| Total Hours through January 1, 2018 | 505 hrs | |