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7 **Markus Risinger, #031524**  
8 *Attorney for Clayton Echard*

9 **IN THE ARIZONA COURT OF APPEALS**

10 **DIVISION TWO**

11 In Re the Matter of:

Case No.: 2 CA-CV 2024-0315

12 **LAURA OWENS,**

**APPELLEE'S APPLICATION FOR  
ATTORNEY FEES AND COSTS**

13 Petitioner/Appellant,

14 And

15 **CLAYTON ECHARD,**

16 Respondent/Appellee.  
17  
18

19 Appellee, **CLAYTON ECHARD**, requested leave to file a supplemental application  
20 for attorney fees and costs in his Response to Appellant's Motion for Reconsideration. On  
21 May 6, 2025, the Court entered an Order awarding Appellee his attorney fees and costs in  
22 the appeal proper and granting leave to file a supplemental request in light of the April 30  
23 Order denying the Appellant's Motion for Reconsideration. This is the supplemental  
24 request.  
25

26 Mr. Echard incorporates the Application for Attorney Fees and Costs and Affidavit,  
27 filed April 4, as if fully restated herein.  
28

1 For his supplemental application, an updated billing statement setting forth the fees  
2 and costs incurred in responding to the Appellant's Motion for Reconsideration is attached  
3 as **Exhibit A**. Billing entries not directly related to the Motion for Reconsideration have  
4 been redacted and excluded from the calculation.

5  
6 In total, Mr. Echard incurred the following fees and costs in responding to the Motion  
7 for Reconsideration (including time spent evaluating Appellant's arguments for  
8 reconsideration, research, drafting the response, and other tasks that a competent attorney  
9 would undertake in the same circumstances):

11 Fees for legal services: \$3,976.50  
12 Fees to prepare Supplemental Application: *waived*  
13 Costs (e.g., filing fees): *waived*  
14 **Total: \$3,976.50**

15 Therefore, Mr. Echard requests a supplemental award of attorney fees and costs in a  
16 total amount of **\$3,976.50**.

17 **RESPECTFULLY SUBMITTED** on May 9, 2025.

18 **WOODNICK LAW, PLLC**

19 

21 Markus Risinger  
22 *Attorney for Respondent/Appellee*

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[REDACTED]

Exhibit “A”

Woodnick Law, PLLC  
1747 E. Morten Ave., Ste. 205  
Phoenix, AZ 85020

Invoice submitted to:  
Echard Appeal

May 9, 2025

Professional Services

|  |    | Hrs/Rate          | Amount |
|--|----|-------------------|--------|
|  |    |                   |        |
|  |    |                   |        |
|  |    |                   |        |
| 4/11/2025  | MR | 0.30<br>450.00/hr | 135.00 |
| REVIEWED MOTION FOR RECONSIDERATION FILED BY<br>OPPOSING COUNSEL AND BRIEF DISCUSSION WITH GW  |    |                   |        |
| 4/14/2025  | MB | 0.10<br>175.00/hr | 17.50  |
| RECEIVED AND SENT TO CLIENT MOTION FOR<br>RECONSIDERATION  |    |                   |        |
|  | MR | 0.10<br>450.00/hr | 45.00  |
| EMAIL TO CLIENT WITH BRIEF COMMENTS AND EXPLANATION<br>OF MOTION FOR RECONSIDERATION PROCEDURES  |    |                   |        |
| 4/15/2025  | MB | 0.10<br>175.00/hr | 17.50  |
| RECEIVED AND SENT TO CLIENT ORDER RE RESPONSE TO<br>MOTION FOR RECONSIDERATION   |    |                   |        |
| 4/16/2025  | MR | 0.30<br>450.00/hr | 135.00 |
| REVIEWED ORDER FROM COURT SETTING AGENDA RE MOTION<br>FOR RECONSIDERATION; EMAIL TO CLIENT REGARDING<br>ORDER, SIGNIFICANCE, NEXT PROCEDURAL STEPS, ETC. |    |                   |        |
| 4/21/2025  | IR | 2.00<br>295.00/hr | 590.00 |
| RESEARCH AND DRAFT RESPONSE TO MOTION FOR<br>RECONSIDERATION   |    |                   |        |
| 4/23/2025  | MR | 2.10<br>450.00/hr | 945.00 |
| RESEARCH AND DRAFTED OF RESPONSE TO MOTION FOR<br>RECONSIDERATION, SPECIFICALLY REVIEWING EMANUEL,<br>STAGECOACH TRAILS, AND VARIOUS CASES CITED IN EACH |    |                   |        |

|  | <u>Hrs/Rate</u> | <u>Amount</u> |
|--|-----------------|---------------|
|--|-----------------|---------------|

REGARDING BIAS, APPEARANCE OF IMPROPRIETY, ACTUAL PREJUDICE, ETC. (E.G., BROWN, MUNOZ, MCELHANON, LESLIE, VALENCIA, ETC.)

4/23/2025 GRW STAFF WITH MR RE APP ARGUMENTS

|           |        |
|-----------|--------|
| 0.30      | 195.00 |
| 650.00/hr |        |

4/24/2025 MR ADDITIONAL RESEARCH AND DRAFTING OF RESPONSE TO MOTION FOR RECONSIDERATION, INCLUDING COMPLETING PREJUDICIAL BIAS SECTION, RESEARCHING CASES CITED IN FEES SECTION (KENT, ETC.), DRAFTING RESPONSE TO FEES SECTION, AND GLOBAL REVISIONS

|           |        |
|-----------|--------|
| 2.10      | 945.00 |
| 450.00/hr |        |

GRW STAFF WITH MR RE DRAFT

|           |        |
|-----------|--------|
| 0.20      | 130.00 |
| 650.00/hr |        |

4/26/2025 MR FINAL REVISIONS TO RESPONSE TO MOTION FOR RECONSIDERATION FOR FILING NEXT WEEK

|           |        |
|-----------|--------|
| 0.40      | 180.00 |
| 450.00/hr |        |

4/28/2025 GRW STAFF WITH MR RE REVISIONS

|           |        |
|-----------|--------|
| 0.20      | 130.00 |
| 650.00/hr |        |

GRW REVISIONS TO MR DRAFT

|           |        |
|-----------|--------|
| 0.20      | 130.00 |
| 650.00/hr |        |

IR MINOR EDITS TO DRAFT MX FOR RECONSIDERATION

|           |       |
|-----------|-------|
| 0.20      | 59.00 |
| 295.00/hr |       |

4/29/2025 MR ADDED ADDITIONAL CITATIONS TO RECORD AND MEMO DECISION TO RESPONSE TO MOTION FOR RECONSIDERATION AND FINAL PROOFING FOR FILING; DRAFTED COC AND COS AND INSTRUCTED PARALEGAL TO FILE

|           |        |
|-----------|--------|
| 0.50      | 225.00 |
| 450.00/hr |        |

MB FINALIZED, FILED AND SENT TO CLIENT AND OPPOSING COUNSEL RESPONSE TO MOTION FOR RECONSIDERATION

|           |       |
|-----------|-------|
| 0.20      | 35.00 |
| 175.00/hr |       |

4/30/2025 MB RECEIVED AND SENT TO CLIENT ORDER RE DENYING MOTION FOR RECONSIDERATION

|           |       |
|-----------|-------|
| 0.10      | 17.50 |
| 175.00/hr |       |

[REDACTED]

|            |            |
|------------|------------|
| [REDACTED] | [REDACTED] |
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5/6/2025 MR REVIEWED ME FROM COURT AND EMAIL TO CLIENT WITH BRIEF SUMMARY AND COMMENTS

|           |       |
|-----------|-------|
| 0.10      | 45.00 |
| 450.00/hr |       |

[REDACTED]

|            |            |
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| [REDACTED] | [REDACTED] |
|------------|------------|

[REDACTED]

|            |            |
|------------|------------|
| [REDACTED] | [REDACTED] |
|------------|------------|

For professional services rendered

| <u>Hours</u> | <u>Amount</u> |
|--------------|---------------|
| 12.30        | \$4,514.50    |

[REDACTED]  
[REDACTED]  
[REDACTED]