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JAMES P. BALLANTINE
Attorney at Law
329 East Anapamu Street
Santa Barbara, California 93101
(805) 962-2201
State Bar No. 152015

Attorney for PARK MANAGEMENT OF NOMAD VILLAGE MOBILE HOME PARK

ARBITRATION PROCEEDINGS UNDER THE SANTA BARBARA COUNTY
MOBILEHOME RENT CONTROL ORDINANCE

IN RE NOMAD VILLAGE MOBILE HOME PARK)
)
) DECLARATION OF
) JAMES P. BALLANTINE, ESQ.
) IN SUPPORT OF
) SUMMARY OF ACCOUNTS
) FOR PROFESSIONAL FEES
)
) Arbitration Before the
) Hon. Judge David W. Long (Ret.),
) Arbitrator
)
)
)
)
) HEARING DATES:
) November 18, 2016
) February 10, 2017
)

DECLARATION OF JAMES P. BALLANTINE, ESQ.

I, JAMES P. BALLANTINE, declare:

1. I am the attorney of record for the LAZY LANDING MHP, LLC, and

1 WATERHOUSE MANAGEMENT CORP., the Park Management of Nomad Village Mobile
2 Home Park (referred to herein collectively as "Park Management") in these arbitration
3 proceedings. I submit this declaration in support of the Park Management's Application for
4 Reimbursement of the Legal and Professional Fees incurred by Park Management in the Rent
5 Review proceedings under and related to Santa Barbara County Mobilehome Rent Control
6 Ordinance. I have personal knowledge of the following facts and, if called as a witness, could
7 and would testify competently thereto.
8

9 2. All of the legal and professional fees that are the subject of this declaration were
10 actually, reasonably, and necessarily incurred by Park Management, and were solely incurred by
11 Park Management as a result of Park Management being subject to rent control under the Santa
12 Barbara County Mobilehome Rent Control Ordinance.

13 3. Submitted herewith as Park Management's Arbitration **Exhibit 56** hereto is a true
14 and correct copy of the billing summary submitted to Park Management by St. John and
15 Associates for consulting work performed for Park Management related to rent review
16 proceedings under the Santa Barbara County Mobilehome Rent Control Ordinance, including the
17 calculation and preparation of the Rent Increase Notices at issue in these rent review
18 proceedings, and consulting and expert witness work for Park Management in these Arbitration
19 proceedings petitioned for by the homeowners of Nomad Village Mobile Home Park. The work
20 also related to some consultation and expert witness work related to the homeowners' appeals of
21 the Arbitration Award in the prior arbitration proceedings. A billing summary for services
22 performed by St. John and Associates for this work through April 7, 2016, was previously
23 provided to the homeowners and is in evidence as **Exhibit 9**. **Exhibit 56** updates those invoices
24 through the current date. All such professional work by St. John and Associates was performed
25 for Park Management and pursuant to my request as attorney for Park Management.
26

27 4. Submitted herewith as Park Management's Arbitration **Exhibit 57** hereto is a true
28

1 and correct copy of the Summary of Account for the period February 17, 2016 to April 5, 2017,
2 prepared by my office setting forth the hours of legal work expended, and costs incurred, on
3 behalf of Park Management through any office, in the rent review proceedings under and related
4 to Santa Barbara County Mobilehome Rent Control Ordinance. **Exhibit 57** accurately reflects
5 the attorney's fees and costs incurred by the Park Management to my office in those matters
6 through the date hereof. I personally performed all of the legal work set forth therein, and
7 personally supervised the incursion all of expenses set forth therein. The Summary of Account is
8 based on records of work actually performed, prepared by me at or near the time each entry for
9 the work was performed. It is the regular practice of my office to prepare the time records. The
10 time records are entered into the computer using standard Excel software. The records are
11 subsequently reviewed by me to assure their accuracy.

13 5. I received a J.D. degree from Hastings College of the Law in 1990. I have been
14 admitted to practice law in California for over twenty-five years. My practice focuses upon real
15 estate matters, particularly mobilehome law. A large portion of my practice includes an
16 emphasis in the area of mobilehome law, including under the California Mobilehome Residency
17 Law, the Mobilehome Parks Act under the California Health & Safety Code, Title 25 of the
18 California Code of Regulations governing mobilehome parks, various municipal mobilehome
19 rent control ordinances, and other laws relating to mobilehome parks, mobilehomes and
20 mobilehome tenancies. I have represented mobilehome homeowners, mobilehome homeowners
21 associations, mobilehome park owners and mobilehome park management, mobilehome dealers,
22 and mobilehome lenders in numerous litigation and transactional matters for over 20 years,
23 including in municipal mobilehome rent control proceedings and other administrative and legal
24 proceedings involving fair rates of return to mobilehome park owners under mobilehome rent
25 control laws.

26
27 6. The reasonable hourly rate for the legal work that I performed in this matter is
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1 \$450.00 per hour, as set forth in **Exhibit 57**. That is my normal hourly rate charged to clients for
2 legal representation, and the rate at which Park Management agreed to pay and has paid in these
3 proceedings. This hourly rate is been awarded to me by courts, and is commensurate with the
4 billing rates of attorneys with over 25 years of experience and engaged in real estate litigation in
5 Southern California, including in the Santa Barbara area, particularly with specialized knowledge
6 and experience in practice in mobilehome law.

7
8 7. The legal work undertaken in this matter constituted a variety of steps taken to
9 represent the Park Management's interests in the administrative rent review proceedings under
10 and related to Santa Barbara County Mobilehome Rent Control Ordinance. The time spent in
11 this matter was directly related to the Park Management's March 31, 2016 notice of rent increase
12 for the space rents in Nomad Village Mobilehome Park and the homeowners' Petition for
13 Arbitration disputing the rent increase in its entirety, including all aspects of the instant Rent
14 Review Arbitration Proceedings. The legal work undertaken was all in my professional opinion
15 reasonably necessary properly to represent Park Management's interests in these Rent Review
16 proceedings.


17
18 7. I represented Park Management of Nomad Village Mobile Home Park in a
19 municipal administrative rent proceeding under the Santa Barbara County Mobilehome Rent
20 Control Ordinance in an arbitration hearing in September 2011. Petitioners herein, the
21 homeowners of Nomad Village Mobile Home Park, called Dr. Kenneth Baar to testify as an
22 expert witness for the homeowners in that Arbitration proceeding. The hearing lasted for two
23 hearing days, on September 19 and 20, 2011, five years ago. Economist Dr. Michael St. John
24 was the expert witness for Park Management. The hearing officer in that case awarded Park
25 Management \$110,000 in professional fees incurred by Park Management, for fees incurred with
26 my office and St. John & Associates for the administrative hearing proceedings, the entire
27 amount requested in the fee application made to the hearing officer. The fee request and award
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did not involve any court proceedings or appeals, just the arbitration hearing, through the post hearing briefing in October 2011. The Arbitrator's Award of \$110,000 was upheld by Santa Barbara Superior Court Judge Thomas P. Anderle. That arbitration award of \$110,000 by the Arbitrator for professional fees in that 2011 administrative rent proceeding formed the basis for the \$110,000 retainer amount set forth in the notice of rent increase that is at issue in the instant rent review proceeding.

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

Dated: April 5, 2017



JAMES P. BALLANTINE
Attorney for Park Management
NOMAD VILLAGE MOBILEHOME
PARK

EXHIBIT “56”

St. John & Associates
Property Management Consultants
P.O. Box 338 * 510.845.8928
Mendocino, CA 95460-0338
www.stjohnandassociates.net

Invoice submitted to:
Ken Waterhouse
Waterhouse Management
500 Giuseppe Ct, #2
Roseville, CA 95678

April 05, 2017
In Reference To: Nomad MHP

Professional Services

			<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
3/29/2016	- MSJ	E-mail Emails	200.00/hr		100.00
4/7/2016	- MSJ	E-mail Emails.	200.00/hr		250.00
5/8/2016	- MSJ	R Email.	200.00/hr		100.00
5/10/2016	- MSJ	R Document Preparation.	200.00/hr		500.00
5/11/2016	- MSJ	DP Email.	200.00/hr		300.00
5/19/2016	- MSJ	E-mail 5/19	200.00/hr		150.00
6/9/2016	- MSJ	PC Email.	200.00/hr		100.00
6/10/2016	- MSJ	E-mail	200.00/hr		50.00
6/28/2016	- MSJ	R Email.	200.00/hr		100.00
7/1/2016	- MSJ	E-mail	200.00/hr		100.00

			<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
9/14/2016	- MSJ	DP Email.	250.00/hr		125.00
11/14/2016	- MSJ	PC (JB)	250.00/hr		62.50
11/16/2016	- MSJ	R Document Preparation, Hearing Preparation, Email.	250.00/hr		500.00
11/17/2016	- MSJ	PC (JB), Meeting, Hearing Preparation, Travel.	250.00/hr		2,187.50
11/18/2016	- MSJ	HP Hearing.	250.00/hr		2,500.00
11/20/2016	- MSJ	E-mail	250.00/hr		125.00
11/21/2016	- MSJ	R Document Preparation, Email.	250.00/hr		625.00
11/22/2016	- MSJ	R Document Preparation.	250.00/hr		1,625.00
11/23/2016	- MSJ	DP Email.	250.00/hr		750.00
11/25/2016	- MSJ	DP Email.	250.00/hr		250.00
11/30/2016	- MSJ	DP Email, Phone Call (JW).	250.00/hr		875.00
12/1/2016	- MSJ	DP Email.	250.00/hr		187.50
1/5/2017	- MSJ	PC (JB)	250.00/hr		125.00
1/24/2017	- MSJ	R Document Preparation, Email.	250.00/hr		875.00
1/25/2017	- MSJ	DP Emails.	250.00/hr		687.50
1/26/2017	- MSJ	R Document Preparation, Email.	250.00/hr		1,125.00
1/27/2017	- MSJ	R Document Preparation, Emails.	250.00/hr		500.00

			<u>Rate</u>	<u>Tax#</u>	<u>Amount</u>
1/28/2017	- MSJ	DP	250.00/hr		500.00
1/29/2017	- MSJ	DP	250.00/hr		250.00
1/30/2017	- MSJ	PC (JB), Document Preparation (Letter), Email.	250.00/hr		500.00
1/31/2017	- MSJ	DP Emails.	250.00/hr		687.50
2/2/2017	- MSJ	PC (JB), Document Preparation, Email.	250.00/hr		1,000.00
2/3/2017	- MSJ	DP Email.	250.00/hr		375.00
2/4/2017	- MSJ	DP Email.	250.00/hr		625.00
2/7/2017	- MSJ	DP Email.	250.00/hr		375.00
2/9/2017	- MSJ	TRAVEL	250.00/hr		2,000.00
2/10/2017	- MSJ	HP Hearing.	250.00/hr		2,500.00
2/13/2017	- MSJ	E-mail Phone Call (JB).	250.00/hr		250.00
2/15/2017	- MSJ	E-mail (KW)	250.00/hr		375.00
For professional services rendered			99.00		\$24,312.50

Additional Charges :

			<u>Qty/Price</u>		
12/17/2016	- MSJ	TRAVEL Mileage (Mendocino to Cabrillo Inn Hotel, Santa Barbara) 458 mi x 2 (at \$0.54/mi), 11/17-18/2016; not previously posted.	1 917.08		917.08
	- MSJ	TRAVEL Cabrillo Inn at the Beach, Santa Barbara, Nov. 17-18, 2016; not previously posted.	1 143.28		143.28

	<u>Qty/Price</u>	<u>Tax#</u>	<u>Amount</u>
12/17/2016 - MSJ Parking Downtown Parking, Anacapa St., 11/18/16, not previously posted.	1 6.00		6.00
2/10/2017 - SJA TRAVEL Fess Parker Doubletree Hotel, Santa Barbara, 2/9/17.	1 366.42		366.42
Total costs			<u>\$1,432.78</u>
For professional services rendered	<u>99.00</u>		<u>\$25,745.28</u>
10/21/2009 Invoice No. 12887	12887		\$300.00
11/14/2009 Payment - Thank You. Check No. 5448			(\$300.00)
12/21/2009 Invoice No. 12943	12943		\$750.00
2/24/2010 Payment - Thank You. Check No. 5556			(\$750.00)
4/21/2010 Invoice No. 13012	13012		\$450.00
5/19/2010 Payment - Thank You. Check No. 5640			(\$450.00)
5/21/2010 Invoice No. 13032	13032		\$1,125.00
6/9/2010 Payment - Thank You. Check No. 5649			(\$1,125.00)
6/21/2010 Invoice No. 13050	13050		\$1,675.00
8/21/2010 Invoice No. 13111	13111		\$75.00
9/21/2010 Invoice No. 13140	13140		\$1,850.00
10/20/2010 Invoice No. 13186	13186		\$637.50
11/4/2010 Payment - Thank You. Check No. 5789			(\$3,600.00)
11/19/2010 Payment - Thank You. Check No. 5814			(\$637.50)
11/21/2010 Invoice No. 13201	13201		\$1,200.00
12/21/2010 Invoice No. 13231	13231		\$900.00
1/20/2011 Invoice No. 13259	13259		\$112.50
2/10/2011 Payment - Thank You. Check No. 5889			(\$2,212.50)
2/21/2011 Invoice No. 13285	13285		\$6,539.66
3/21/2011 Invoice No. 13308	13308		\$4,341.11
4/21/2011 Invoice No. 13337	13337		\$1,762.50
5/20/2011 Payment - Thank You. Check No. 5980			(\$12,643.27)
7/21/2011 Invoice No. 13402	13402		\$262.50
8/12/2011 Payment - Thank You. Check No. 6067			(\$262.50)
9/21/2011 Invoice No. 13444	13444		\$10,238.88
10/20/2011 Payment - Thank You. Check No. 6157			(\$10,238.88)
10/21/2011 Invoice No. 13459	13459		\$1,125.00
11/6/2011 Payment - Thank You. Check No. 6168			(\$1,125.00)
11/21/2011 Invoice No. 13490	13490		\$600.00
12/8/2011 Payment - Thank You. Check No. 6199			(\$600.00)
12/21/2011 Invoice No. 13515	13515		\$1,450.00
1/7/2012 Payment - Thank You. Check No. 6230			(\$1,450.00)
2/21/2012 Invoice No. 13551	13551		\$300.00
3/20/2012 Payment - Thank You. Check No. 6309			(\$300.00)
2/21/2015 Invoice No. 14465	14465		\$100.00
3/5/2015 Payment - Thank You. Check No. 7297			(\$100.00)
2/21/2016 Invoice No. 14796	14796		\$4,690.54
3/7/2016 Payment - Thank You. Check No. 7609			(\$4,690.54)
3/21/2016 Invoice No. 14837	14837		\$2,250.00
4/15/2016 Payment - Thank You. Check No. 7836			(\$2,250.00)
4/21/2016 Invoice No. 14905	14905		\$350.00

		<u>Amount</u>
5/13/2016 Payment - Thank You. Check No. 7665		(\$350.00)
5/21/2016 Invoice No. 14946	14946	\$1,050.00
6/4/2016 Payment - Thank You. Check No. 7687		(\$1,050.00)
6/21/2016 Invoice No. 14969	14969	\$150.00
7/7/2016 Payment - Thank You. Check No. 7715		(\$150.00)
7/21/2016 Invoice No. 14998	14998	\$200.00
8/5/2016 Payment - Thank You. Check No. 7741		(\$200.00)
9/21/2016 Invoice No. 15070	15070	\$125.00
10/7/2016 Payment - Thank You. Check No. 7792		(\$125.00)
11/21/2016 Invoice No. 15122	15122	\$5,375.00
12/3/2016 Payment - Thank You. Check No. 7853		(\$5,375.00)
12/21/2016 Invoice No. 15146	15146	\$5,378.86
1/6/2017 Payment - Thank You. Check No. 7881		(\$5,378.86)
1/21/2017 Invoice No. 15168	15168	\$125.00
2/6/2017 Payment - Thank You. Check No. 7907		(\$125.00)
2/21/2017 Invoice No. 15191	15191	\$12,991.42
3/7/2017 Payment - Thank You. Check No. 7934		(\$12,991.42)

EXHIBIT “57”

STATEMENT OF ACCOUNT

Client: Waterhouse Management Corp., Lazy Landing MHP, LLC
 Matter: Representation of Park Management in matters regarding Nomad Village Mobilehome Park Rent Control Proceedings under Santa Barbara County Mobilehome Rent Control Ordinance and Issues Related to Homeowner Rent Petition and Administrative Appeals
 Period: February 17, 2016 - April 5, 2017

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
17-Feb-16	Conference with Waterhouse Management Corp. President Ken Waterhouse and Waterhouse Management Corp. Vice-President Ruben Garcia to review status and regarding rent increase issues	1.0	
17-Feb-16	T-call: economist Dr. Michael St. John regarding proceeding with rent increase notice and what steps need to be undertaken	0.4	
19-Feb-16	Draft & finalize e-mail to WMC President Ken Waterhouse, WMC Vice-President Ruben Garcia and Dr. Michael St. John regarding copy of exhibit, proceeding with rent increase notice, etc.; Analysis and review of Ordinance regarding same	0.8	
22-Feb-16	T-call: WMC President Ken Waterhouse regarding rent increase status and proceedings	N/C	
25-Feb-16	Analysis regarding rent increase issue; Review and analyze provisions of Santa Barbara County Mobilehome Rent Control Ordinance; T-call: Waterhouse Management Corp. Controller Shari Jennings regarding rent increase issues; Review and analyze e-mail from Dr. Michael St. John regarding his MNOI analysis; Draft response regarding proceeding; Analysis to support how to proceed; Review and analyze Ordinance provisions regarding capital expense and capital improvement definitions and amortization provisions; Review and analyze capital invoices hearing transcript regarding amortization testimony by the homeowners' consultant in prior rent control proceeding to determine homeowners' admissions	2.5	
26-Feb-16	Finalize e-mail to Dr. Michael St. John regarding analysis regarding rent issues; T-call: Dr. Michael St. John regarding he's still working on numbers and will review more	0.8	
26-Feb-16	Review and respond to Dr. Michael St. John e-mail	N/C	
27-Feb-16	Research Ordinance and Rules and file documents regarding rent increase notices; Analysis regarding rent increase notice and proceedings; T-conference with WMC President Ken Waterhouse to review status and strategy	1.0	
28-Feb-16	Review and analyze e-mail from Dr. Michael St. John and attached spreadsheet with preliminary calculations on rent increase issues and further analysis regarding numbers; T-call: Dr. St. John to confer regarding his analysis and rent issues; T-call: WMC President Ken Waterhouse regarding status and proceeding in light of Dr. St. John's information; Review and analyze revised calculations forwarded by Dr. St. John and draft and finalize response	1.5	
29-Feb-16	Review and analyze e-mails from Debra Hamrick and Tom Griffin; Draft & finalize responses (multiple) regarding ambiguous representation status of Tom Griffin	0.4	
2-Mar-16	Review and analyze e-mail from Dr. Michael St. John regarding MNOI analysis and his draft MNOI analysis; Draft & finalize response; Review additional e-mail from homeowners' attorney Tom Griffin and attachments regarding his withdrawal from Court case and arbitration; T-call: Tom Griffin; Draft & finalize e-mail to client representatives forwarding Tom Griffin communications and summarizing Tom Griffin's communications and status	1.5	
2-Mar-16	Confer with Retired Judge Eleanor Reiner regarding potential mediation as she had mediated case with same Park	N/C	
3-Mar-16	Review and analyze e-mail from homeowner representative Debra Hamrick; Forward to client representatives and draft & finalize e-mail regarding status and proceeding and regarding settlement issues	0.4	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
27-Mar-16	Detailed review and analysis of Dr. Michael St. John MNOI analysis and Spreadsheet regarding 2016 rent increase; Analysis regarding presentation issues and format and language change to spreadsheet; Drafting of revisions to spreadsheet; Detailed review and analysis of Santa Barbara County Mobilehome Rent Control Ordinance and Rules of Hearing governing rent increases for preparation of spreadsheet and rent increase notice; Outline rent increase notice	4.0	
29-Mar-16	Draft & finalize e-mail to WMC client representatives and economist Dr. Michael St. John regarding rent increase process and timelines and transmitting draft spreadsheet for their review and approval; Review and analyze responses by WMC President Ken Waterhouse and Dr. Michael St. John; Begin drafting rent increase notice	3.0	
30-Mar-16	Drafting of Rent Increase Notice and Rent Increase Detail documents; Analysis of spreadsheet and file documents for use in preparation of Rent Increase Notice and Rent Increase Detail; Draft & finalize e-mail to client representatives transmitting draft documents (Rent Increase Notice and Rent Increase Detail) for their review and comment; Review and analyze CPI calculations forwarded by WMC Controller Shari Jennings; Draft & finalize e-mail to Shari Jennings regarding spreadsheet and preparation of calculations; T-call: Ms. Jennings regarding spreadsheet and preparation of calculations; T-call: Ms. Jennings regarding mechanics of rent increase package; T-call: Ken Waterhouse regarding strategy for proceeding	5.0	
31-Mar-16	Further draft, revise and finalize Rent Increase Notice, Rent Increase Detail and Rent Increase Spreadsheet documents; T-call: Dr. St. John (several), WMC President Ken Waterhouse, WMC Vice-President Ruben Garcia and Park Manager Miguel Lopez regarding Rent Increase mechanics and issues; Draft & finalize e-mail to Shari Jennings forwarding Rent Increase pdf package for mail service; E-mail exchanges with WMC Controller Shari Jennings regarding finalization of documents, format of spreadsheet to each resident and individual rent amounts, service of notice package and proofs of service; Review and analyze documents forwarded by Ms. Jennings: Rent chart, proof of service, spreadsheets; Prepare proof of service document for Park Manager to execute; Conference with Park Manager Miguel Lopez to review Rent Increase package and instruct on preparation of individual notices and service; Review e-mail from Ms. Jennings regarding mail service completed with proof of service	3.5	
1-Apr-16	T-call: with Park Manager Miguel Lopez confirming service has been completed; Prepare Proof of Service package and finalize; Draft & finalize e-mails to Shari Jennings and client representatives confirming service; E-mail exchange with Shari Jennings regarding finalizing Proof of Service by mail package	0.8	
6-Apr-16	Analysis of Rules of Proceeding and Ordinance regarding information to be available to homeowners regarding Rent Increase; Drafting of e-mail to client representatives regarding financial documents needed; Analysis of MNOI analyses and identify analysis spreadsheet to use for proceeding; T-call: Park Manager Miguel Lopez to discuss status and coordinate him making documents available.	2.0	
7-Apr-16	Draft and finalize e-mail to County Clerk requesting confirmation regarding service of award	0.2	
7-Apr-16	Further draft, revise and finalize e-mail to client representatives regarding documents needed and regarding status and process for making documents available; Draft & finalize e-mail to Michael St. John regarding need his invoices; Draft and finalize e-mail to Michael St. John and client representatives regarding MNOI and meet and confer	1.0	
7-Apr-16	Review and analyze e-mail response from Dr. Michael St. John regarding rent issues; Review and analyze invoices from Dr. Michael St. John; E-mail exchange with Dr. Michael St. John regarding invoices; Review and analyze e-mail response from WMC Controller Shari Jennings regarding Profit & Loss, etc.; Review and analyze P&Ls from 2010-2016 (1st quarter)	1.2	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
8-Apr-16	Preparation of Documentation package for residents: prepare cover page listing document; Analysis regarding documents for inclusion and assemble and review documents to ensure completeness; E-mail exchange with Ms. Jennings regarding rent issues; Draft & finalize e-mail to client representatives regarding document package; Review document package; T-call: Park Manager Miguel Lopez regarding transmission of Document Package	1.8	
9-Apr-16	Conference with Park Manager to review document package and instruction and regarding status; Draft & finalize e-mail forwarding document package to WMC Controller Shari Jennings and client representatives and regarding status	0.7	
11-Apr-16	Review and analyze response from County Clerk and attachments	0.2	
11-Apr-16	Review and analyze e-mail from homeowner representative Debra Hamrick regarding copies of documents; T-call: Park Manager Miguel Lopez regarding interaction with park resident Lindsey Davis regarding rent documents; T-call: Ruben Garcia regarding to update and advise; Review Rules; Draft & finalize e-mail response to Debra Hamrick regarding Rule provisions, document availability, litigation and settlement history; Review and respond to Ruben Garcia's e-mail; Review and analyze e-mail from Debra Hamrick	1.8	
12-Apr-16	T-call: Ron Ubaldi, Member and Manager of Lazy Landing MHP, LLC regarding background and status; Review and analyze e-mail from WMC Vice-President Ruben Garcia transmitting meet and confer notice to Park residents; Analyze notice e-mail exchange with Mr. Garcia regarding notice and potential responses; T-call: Ruben Garcia; Draft response e-mail to homeowner representative Debra Hamrick e-mail and further e-mail exchange; Draft & finalize e-mails transmitting Hamrick e-mail exchange to client representatives; Draft & finalize e-mail transmitting Rent Increase package to WMC representatives; T-call: WMC President Ken Waterhouse regarding status and meeting preparation and miscellaneous issues	2.2	
15-Apr-16	Further draft and revise and finalize memo regarding appeal; T-call and conference with Park Manager Miguel Lopez regarding letter and to advise of homeowners' appeal	1.8	
18-Apr-16	Review and analyze e-mails from homeowner representative Debra Hamrick to Ruben Garcia improperly threatening extortion for communicating with Park residents; Review e-mail from Hamrick demanding documents; Review Rules of Hearing; T-call: Ruben Garcia; Review draft letter to residents regarding residents meeting and draft revisions; T-calls with Park Manager Miguel Lopez regarding distributing letter, etc.	1.5	
19-Apr-16	Review and analyze e-mail from WMC Ruben Garcia forwarding Hamrick e-mail from Lindse Davis; T-call: Mr. Garcia regarding same and meeting preparation, etc.; Prepare and organize documents for meeting with homeowners and conference with legal assistant regarding preparing additional document packets; Review and respond to Hamrick e-mails	1.7	
19-Apr-16	Travel to and conduct meeting with client representatives to prepare for meeting with homeowners and homeowner representatives; Travel to and from Nomad Village Mobilehome Park and attend and represent client at information meeting with homeowners and meeting with homeowner representatives; Notes to file; Meeting with client representatives to review meeting and status	4.0	
19-Apr-16	Costs: Printing of additional Document Packets for homeowner representatives		\$120.00
20-Apr-16	Confer with WMC President Ken Waterhouse regarding homeowner meeting and status	N/C	
6-May-16	Initial review of homeowner representative Hamrick e-mail regarding settlement offer; Review WMC Vice-President Ruben Garcia e-mail; T-call: Ruben Garcia; E-mail response to Mr. Garcia	0.8	
7-May-16	Review e-mails from WMC President Ken Waterhouse, Ruben Garcia and Dr. Michael St. John regarding homeowner representative Hamrick offer; Draft & finalize e-mail regarding response and moving forward; Draft & finalize e-mail to client representatives forwarding Park Management Response	0.7	
9-May-16	Review e-mails from WMC President Ken Waterhouse, Vice-President Ruben Garcia and Dr. Michael St. John regarding Park Management's Response to Homeowners' Petition for Review	0.5	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
10-May-16	Research and analysis regarding rent credit procedures and related issues under Santa Barbara County Rent Control Ordinance; Review and analyze Ordinance, Arbitration Awards; File documents regarding arbitration proceedings; Draft memo regarding same	1.5	
18-May-16	Review and analyze Dr. Michael St. John e-mail analyzing residents' offer and his spreadsheet; Draft & finalize e-mail response regarding documents: does he have any follow-up; Review and analyze letter from County regarding Petition by residents and requesting information; Draft & finalize e-mail to client representatives forwarding correspondence from County regarding petition and responding; Review and analyze e-mail from WMC Controller Shari Jennings and attachments regarding information to respond to County; Draft & finalize response; Memo to paralegal regarding calendar response date and prepare letter; On-line research regarding Rent Control process issues with Santa Barbara County	1.2	
24-May-16	Further review and analyze letter from County requesting information; Review and analyze Ordinance and Rules cited in letter, etc.; Research regarding material to send to County; Draft letter to Don Grady, Clerk of Ordinance regarding forwarding material he requested; Forward to client representatives	1.5	
25-May-16	Outline response to homeowner representative Debra Hamrick per t-call with WMC Vice-President Ruben Garcia; Review homeowner proposal document, Dr. Michael St. John correspondence, notes, etc., for preparation of Hamrick correspondence; Prepare correspondence to Homeowner representative responding to their offer and proposing mediation	1.5	
25-May-16	T-call: from Natalie at Santa Barbara County regarding exhibits regarding February hearing; Review and respond to e-mail from Natalie and review exhibit; Notes to file; Draft & finalize e-mail to Natalie forwarding the correspondence to County transmitting documents requested; T-call: WMC Vice-President Ruben Garcia regarding status and proceeding and regarding counter to residents' offer;	0.8	
25-May-16	Costs: Assemble copies of documents requested by Santa Barbara County Clerk of the Ordinance		\$100.00
25-May-16	Costs: Courier: Deliver package of documents to Santa Barbara County Clerk of the Ordinance		\$75.00
25-May-16	Costs: Courier: Pick-up Dismissal from Santa Barbara Superior Court		\$35.00
26-May-16	Draft correspondence to homeowner representative proposing mediation and forward draft to client representatives; T-call: WMC Vice-President Ruben Garcia regarding correspondence to homeowner representative; Further draft and finalize e-mail and correspondence to homeowner representative; Further e-mail exchange with homeowner representative Debra Hamrick; T-call: Park Manager Miguel Lopez	1.8	
3-Jun-16	Review and analyze Petition and Notice of Hearing forwarded by County filed by Homeowners objecting to 2016 rent increase notice; Draft & finalize e-mail to client representatives; E-mail exchange with Dr. Michael St. John; T-call: Dr. Michael St. John regarding hearing scheduling and case status and calculations issues	1.2	
7-Jun-16	Review and analyze e-mail from Natalie Dimitrova forwarding list of potential Arbitrators; Analysis and research regarding Arbitrators and Arbitrator selection process: Review and analyze Rules of Hearing; Research on arbitrators on list; Review file documents regarding Arbitrator disqualification from prior proceeding; Review and analyze Notice of Board of Supervisors hearing e-mailed from Natalie Dimitrova; Preparation regarding filing Objections and Response by Park Management; Review and analyze Petition for Mobilehome Rent Control Hearing forwarded by County; Review and analyze Rules of Hearing provisions regarding Petition, Objection and Response requests, etc.; Analysis regarding preparation of Objections and Response	3.0	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
9-Jun-16	Review and analyze multiple voice mails from Natalie Dimitrova regarding call regarding scheduling Board of Supervisors matter; Return t-call: Natalie Dimitrova regarding scheduling matter; Analyze scheduling issue and draft & finalize e-mail to client representatives updating on scheduling issue and regarding input; T-conference with Ruben Garcia regarding scheduling and status issues; Return t-call: Natalie (L/M -multiple); Draft & finalize e-mail to client representatives regarding update on scheduling issue; Outlining and drafting of Park Management's Objections and Response to Homeowners' Petition for Mobilehome Rent Control Arbitration hearing; Review Ordinance for preparation of Park Management's Objection and Response	6.0	
10-Jun-16	Further drafting, revise and finalize Park Management's Objections and Response to Homeowners' Petition for Mobilehome Rent Control Arbitration Hearing; Further analysis and research and review file documents for preparation of same; Assemble and review exhibits to Objections and Response; Draft & finalize correspondence transmitting Objections and Response to County; Review and analyze multiple e-mails and documents from Natalie Dimitrova: Notice of Board of Supervisors hearing, Resumes of Arbitrator candidates and analysis regarding same; T-conference with Natalie Dimitrova regarding arbitrator selection, process and status, hearing setting issues, etc.; Notes to file	6.0	
10-Jun-16	Courier: File Park Management's Objection and Response to Homeowners' Petition for MHRC Arbitration Hearing		\$45.00
10-Jun-16	Costs: Filing fee required of Park Management by Santa Barbara County because of Homeowners' Petition for Arbitration		\$1,500.00
12-Jun-16	Research regarding Santa Barbara County Board of Supervisors records regarding locate and review and analyze information regarding agenda material regarding action Board of Supervisors took regarding changes to arbitrator panel, including Board letter, attachments, etc.; Analysis regarding same; Begin drafting analysis for client representatives regarding Arbitrator appointment process	1.5	
13-Jun-16	Draft & finalize e-mail to client representatives transmitting copy of Park Management's Objection and Response and correspondence to County	0.2	
13-Jun-16	Draft & finalize e-mail to client representatives transmitting Arbitrator panel and research material and discussion regarding analysis and options for proceeding; Review Dr. Michael St. John response	1.0	
14-Jun-16	Analysis regarding Arbitration selection issue; Research and analysis regarding hearing preparation	0.4	
14-Jun-16	Costs: Daily Journal research		\$90.00
15-Jun-16	Draft & finalize correspondence to Clerk of Ordinance regarding Arbitrator selection; Draft & finalize transmittal to client representatives	0.7	
15-Jun-16	Costs: Courier: Hand-deliver correspondence regarding Arbitrator Selection		\$35.00
21-Jun-16	Draft & finalize e-mail to WMC President Ken Waterhouse regarding analysis regarding accounting requirements; T-call: WMC Controller Shari Jennings regarding accounting and billing issues; Review documents; Review and respond to WMC President Ken Waterhouse e-mail; Review and analyze interest rate analysis from WMC Controller Shari Jennings and model Nomad bill; Analyze same	1.0	
22-Jun-16	Analysis regarding situation regarding Arbitration hearing scheduling; T-call: Natalie Dimitrova, Santa Barbara County Ordinance Clerk designee, regarding hearing scheduling and proposing a prehearing status conference; Draft & finalize e-mail forwarding to client representatives regarding status	0.8	
22-Jun-16	Review and analyze e-mail from homeowner Tony Allen regarding hearing scheduling and nonsensical claim that there is no need for a hearing; Draft & finalize e-mail forwarding to client representatives and regarding status	0.4	
22-Jun-16	Review and analyze e-mail from homeowner Tony Allen regarding hearing scheduling; Draft & finalize e-mail forwarding to client representatives	0.2	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
23-Jun-16	Review and respond to e-mail from Shari Jennings regarding rent billing issue; Review e-mail from homeowner Tony Allen; Review and respond to e-mail from Natalie at Santa Barbara County regarding hearing scheduling	0.4	
24-Jun-16	Review e-mail from Natalie regarding hearing scheduling requesting response to homeowner Tony Allen	0.2	
27-Jun-16	Review and analyze e-mail from WMC Vice-President Ruben Garcia forwarding improper subpoena by Waterhouse representative mailed to the Waterhouse Management Corp. offices demanding appearance of Ken Waterhouse and production of documents at and before arbitration hearing on 7/116; Legal research: review and analyze County Rules of Proceeding, California Code of Civil Procedure sections 1985 et seq regarding subpoenae; Draft & finalize e-mail analysis response to client representatives	2.0	
27-Jun-16	Review and analyze e-mail from Shari Jennings and attached sample rent bill for July 2016 reflecting rent increase noticed by Park Management; Review notice of rent increase and analysis; Draft & finalize response regarding suggested bill revisions to align with rent increase notice, etc.; T-call: Shari Jennings regarding billing issue	1.5	
27-Jun-16	Review and analyze e-mail from Natalie Dimitrova responding to Tony Allen e-mail and regarding arbitration hearing scheduling; Draft & finalize response; Draft & finalize e-mail to client representatives regarding arbitration hearing scheduling	0.3	
28-Jun-16	Review and analyze e-mail from WMC Controller Shari Jennings transmitting revised rent bill; Analyze revised rent bill; Draft & finalize e-mail response analyzing bill and changes; E-mail exchange with Dr. Michael St. John regarding bill; E-mail exchange with Ms. Jennings regarding bill; Review e-mails from Dr. Michael St. John and WMC Vice-President Ruben Garcia regarding hearing availability; Draft & finalize e-mail regarding same	1.5	
29-Jun-16	Review and respond to e-mail from Natalie Dimitrova at Santa Barbara County regarding hearing scheduling; T-call from Natalie regarding hearing status and scheduling; Review and analyze correspondence from Arbitrator Stephen Biersmith regarding subpoena he received from homeowner representative Hamrick (subpoena was improper); Review and respond to e-mail from Dr. Michael St. John regarding he received a subpoena in mail from homeowner representative Hamrick (subpoena also improper)	0.8	
30-Jun-16	Review and analyze homeowners' response to Management's Objection and Response; Draft & finalize e-mail to client representatives analyzing and transmitting homeowners' response	1.0	
1-Jul-16	Review and respond to e-mail of Natalie Dimitrova at Santa Barbara County regarding Notice of Board of Supervisors hearing to park owner parties' e-mail exchange with Ruben Garcia regarding hearing schedule; Review and analyze e-mail from Dr. Michael St. John forwarding improper subpoena from homeowners and analyze subpoena; Review Code of Civil Procedure and Rules	1.0	
8-Jul-16	Review and respond to e-mail from Natalie Dimitrova at Santa Barbara County regarding hearing availability	0.2	
12-Jul-16	Review and analyze e-mail from Natalie Dimitrova at Santa Barbara County regarding hearing scheduling; Forward to client representatives; Review and respond to Dr. St. John e-mail regarding rent issue	0.4	
15-Jul-16	Draft & finalize correspondence to Clerk of Ordinance regarding Arbitrator selection and regarding procedural issue; Draft & finalize e-mail transmitting to client representatives	0.8	
15-Jul-16	Costs: Courier: Arbitration selection letter to County Clerk		\$45.00

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
20-Jul-16	T-call: Clerk of Board regarding Arbitration status, Arbitrator appointment, etc.; Notes to file; T-call: WMC Vice-President Ruben Garcia regarding status; Review and analyze Arbitrator appointment correspondence from County Clerk; Draft & finalize e-mail to client transmitting Notice and regarding status; Review and respond to WMC President Ken Waterhouse and WMC Controller Shari Jennings e-mails; Further draft, review and finalize analysis for client regarding rent increase and credit issue; T-call: Mr. Garcia to update on status	3.0	
25-Jul-16	Review and analyze improper Motion for Summary Judgment in rent arbitration proceedings sent by Hamrick; Review and analyze County Rule of Hearing regarding no provision for Motion for Summary Judgment in rent arbitration proceedings and Park Owner has right to hearing	0.5	
9-Sep-16	Review Notice of Arbitration Hearing from Santa Barbara County; Forward to client representatives; T-call: WMC President Ken Waterhouse regarding status, hearing preparation, etc.	0.5	
10-Sep-16	Arbitration Hearing preparation: Review and analyze Notice of rent increase documents; Analysis regarding appropriate exhibits and issues for hearing brief, Prepare draft of exhibit list, Outlining and begin drafting Park Management's Arbitration Hearing Brief	4.5	
13-Sep-16	Preparation of Park Management's Arbitration Hearing Brief; Review and analyze case documents for preparation of Park Management's Arbitration Hearing Brief	4.5	
14-Sep-16	Preparation of Park Management's Arbitration Hearing Brief; Legal research for Arbitration Hearing Brief: Ordinance, cases regarding Attorney's Fees, etc.	1.5	
15-Sep-16	Further drafting of Park Management's Arbitration Hearing brief; Further preparation of Park Management's Arbitration Exhibit List and review and analyze exhibit documents	1.5	
20-Sep-16	Confer with legal assistant regarding call from Judge Long's office regarding any prehearing submissions and regarding check to see he has Park Owner's Response to Petition; T-call from Natalie Dimitrova from County regarding potential problem with Arbitrator's schedule and discuss options and voice objection to appointment of new arbitrator as requested by homeowners; Review Natalie Dimitrova e-mail; T-call: from Natalie Dimitrova regarding arbitration to be postponed; T-call: Ken Waterhouse to advise; Draft & finalize e-mail to Michael St. John to advise	0.7	
21-Sep-16	Review and analyze e-mail from Natalie Dimitrova regarding scheduling issues; Review calendar; Draft & finalize e-mail to client representatives regarding scheduling issues; Review and analyze e-mail from Michael St. John regarding subpoena mailed to him from homeowners; Review and analyze improper subpoena; Draft & finalize e-mail response to Michael St. John	0.8	
22-Sep-16	Review e-mail from Natalie Dimitrova with update regarding Arbitrators' availability; Review and analyze e-mails from Ken Waterhouse, Ruben Garcia and Michael St. John regarding hearing availability; Draft & finalize e-mail to Natalie Dimitrova at Santa Barbara County regarding hearing availability of Park Owner	0.3	
22-Sep-16	T-call: Ken Waterhouse regarding status, hearing issues, etc.	N/C	
23-Sep-16	Review and analyze e-mail from Natalie Dimitrova regarding homeowners unavailability on November 11; Draft & finalize response; T-call: Ruben Garcia regarding hearing preparation and proceeding on November 18 v. December 16 and status issues regarding treatment of rent, etc.	0.4	
26-Sep-16	Review Natalie Dimitrova e-mail rescheduling Arbitration Hearing; T-calls: Ruben Garcia (L/M), Ken Waterhouse (L/M); E-mail to Natalie Dimitrova; T-call: Ken Waterhouse regarding hearing scheduling; Review and analyze letter from Arbitrator Stephen Biersmith regarding subpoena from Hamrick	0.5	
26-Sep-16	T-call: Ken Waterhouse regarding hearing scheduling and status	N/C	
27-Sep-16	Legal research regarding binding arbitration issue to analyze finality of arbitration; Review cases	2.0	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
27-Sep-16	Draft & finalize e-mail to Natalie Dimitrova regarding Park Management can be available for Arbitration Hearing on November 18	0.2	
28-Sep-16	Review e-mail from Natalie Dimitrova confirming Arbitration Hearing will be on November 18; Notes to file	0.2	
14-Nov-16	Further draft, revise, proofread and finalize Arbitration Hearing Brief and conference with legal assistant regarding service and filing; Review and analyze e-mail from Michael St. John regarding Arbitration Hearing scheduling issue; T-call: Michael St. John regarding Arbitration Hearing preparation	3.0	
14-Nov-16	Costs: Legal Assistant: preparation and finalize Arbitration Hearing Brief and Table of Content for submission to Arbitrator Judge David W. Long, Clerk of the Board, and service on homeowner representative (1 hour at \$125 per hour)		\$125.00
14-Nov-16	Costs: Overnight mail: Arbitration Hearing Brief to Arbitration Hearing officer		\$35.00
15-Nov-16	Costs: Courier: Original Arbitration Hearing Brief to file with Clerk of Ordinance		\$35.00
15-Nov-16	Conference with legal assistant regarding update and preparation of Exhibit list and exhibits for Rent Arbitration hearing; Review of Arbitration Exhibits; Review and analyze multiple e-mails from County regarding Homeowners' Hearing brief, etc.; Review and analyze Homeowners' Arbitration Hearing Brief; Draft & finalize e-mail transmitting Park Management's and Homeowners' hearing briefs to client representatives; Draft & finalize e-mail transmitting documents provided to homeowners to other representatives; Review and analyze Homeowners' Motion for Summary Judgment; Research regarding opposition to Homeowners' Motion for Summary Judgment and begin preparation of Opposition	4.0	
16-Nov-16	Rent Arbitration Hearing preparation: Review and analysis of exhibit list and exhibits; T-call: Ruben Garcia regarding Arbitration Hearing status and preparation; Draft & finalize e-mail to Ken Waterhouse, Ruben Garcia, Dr. Michael St. John regarding Arbitration Hearing preparation and documents to review; Draft Arbitration Hearing examination outline for Ken Waterhouse; Review documents for preparation of examination outline; E-mail to Mr. Waterhouse, et. al. regarding examination outline; T-call: Mr. Garcia regarding documents e-mailed	3.0	
16-Nov-16	Review and analyze e-mail from Michael St. John regarding CPI; Research regarding CPI issues to confirm correct CPI number used to bill homeowners; e-mail exchanges with Michael St. John, regarding CPI and hearing preparation issues; T-call: Dr. St. John regarding hearing preparation issues; Review and analyze e-mail from Margo Wagner at County regarding documents provided to Arbitrator and review and analyze attached e-mail exchange and documents; E-mail exchange with Ms. Wagner; Further draft, revise and finalize Opposition to Homeowners' Motion for Summary Judgment	4.0	
16-Nov-16	T-call: Ken Waterhouse regarding hearing preparation issues; Notes to file; Revisions to Arbitration hearing examination outline for Ken Waterhouse; Drafting of Michael St. John Arbitration hearing examination outline	1.5	
16-Nov-16	Costs: Paralegal: Preparation of Exhibits for Arbitration Hearing before Arbitrator Judge David W. Long (8 hour at \$125.00 hour)		\$1,000.00
16-Nov-16	Costs: Binders, Exhibit Tabs and copies of exhibits		\$345.00
17-Nov-16	Review and analyze e-mail from Michael St. John regarding rent sales and assumptions; T-calls: Michael St. John regarding same; Draft & finalize e-mail response to Dr. Michael St. John regarding rent history; T-call: Ruben Garcia regarding status and rent credit issue; Review and analyze e-mails from Margo Wagner; Review and respond to Hamrick e-mail regarding homeowner representatives and service; T-calls: Michael St. John and Ken Waterhouse regarding hearing preparation issues and scheduling meeting; Revise and finalize examination outlines of Ken Waterhouse and Michael St. John and prepare for meeting; Review and respond to Margo Wagner e-mail regarding witnesses and e-mail exchange; Review and respond to Hamrick e-mail; Final review of Exhibits and Hearing binders and assemble documents for witness preparation meeting	2.0	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
17-Nov-16	Travel to and from and conduct witness preparation meetings with Ken Waterhouse and Michael St. John to prepare for Arbitration Hearing; Notes to file	2.0	
17-Nov-16	Prepare for opening statement for Arbitration Hearing; Draft outline for Opening Statement	1.0	
18-Nov-16	Further preparation of Opening Statement; Represent clients at Arbitration Hearing under Santa Barbara County Mobilehome Rent Control Ordinance and Rules, including, deliver Opening Statement, Conduct Direct Examination of Ken Waterhouse; Defend Cross-Examination of Ken Waterhouse, Lunch conference with hearing team, Conduct Direct Examination of Michael St. John; Defend Cross-Examination of Michael St. John; Hearing management conference with Arbitrator and homeowner representative post-hearing; Conferences with Ken Waterhouse and Michael St. John to review Arbitration Hearing and prepare for continuing Arbitration Hearing; Review Homeowner documents submitted at Arbitration Hearing; Review Park Management documents; Notes to file	7.0	
18-Nov-16	Costs: Copy of Reporter's Transcript of November 18, 2016 Hearing		\$691.05
29-Nov-16	Review and analyze e-mails and documents from Michael St. John, Shari Jennings, Ken Waterhouse regarding updated MNOI and ROI analyses draft and discussion regarding analysis and preparation of updated MNOI analysis, etc.; Review and analyze e-mail from Santa Barbara County Clerk regarding have to postpone hearing; Review and analyze e-mail from Santa Barbara County Clerk regarding Santa Barbara Board of Supervisors Hearing on homeowners' appeal will be continued; T-call: Ken Waterhouse to discuss all issues	2.0	
30-Nov-16	Review and analyze multiple e-mails from County Clerk of the Ordinance regarding need to continue Arbitration hearing date; Draft & finalize e-mail forwarding to client representatives with analysis regarding how to proceed; Review and respond to Michael St. John e-mail regarding his further analysis; Draft & finalize response; Review and analyze e-mail chain from County Clerk of Ordinance regarding hearing moved yet again; Draft & finalize response; Draft & finalize e-mail to client representatives regarding additional change; Further review of previous e-mail from Don Grady regarding Board of Supervisors hearing continued; Research Board of Supervisors hearing schedule; T-call: Don Grady regarding concerns regarding on-going delay of resolving hearing	1.8	
2-Dec-16	Review and analyze e-mail from Hamrick incorrectly denying that the initial Arbitration hearing was not postponed at the homeowners' request; Research and analyze history of communications on this issue; Draft & finalize e-mail response; Draft & finalize e-mail to County representatives regarding hearing scheduling; Review and respond to Hamrick e-mail	1.2	
3-Jan-17	T-call from Ruben Garcia regarding status issues; Analysis regarding same; T-call: Ken Waterhouse regarding status, preparation, etc.	0.5	
4-Jan-17	Draft & finalize e-mail to team regarding appeal hearing and arbitration scheduling; T-call: Michael St. John (L/M)	0.3	
4-Jan-17	Draft & finalize e-mail to Michael St. John	N/C	
4-Jan-17	Review and respond to Ken Waterhouse e-mail	N/C	
6-Jan-17	Draft & finalize letter from client to Jerrie Taylor; e-mail letter draft to Ruben Garcia; T-calls: Ruben Garcia; Finalize letter	1.5	
18-Jan-17	Return t-call: Ruben Garcia (L/M)	N/C	
19-Jan-17	T-call: Ruben Garcia (L/M); Review Michael St. John e-mail	0.3	
20-Jan-17	Review Dr. St. John e-mail; Review and analyze 2016 P & L	1.0	
25-Jan-17	Review and analyze e-mails from Michael St. John regarding his analysis issues; Review and analyze e-mail from Michael St. John requesting information relating to Arbitration Awards; Research regarding Arbitration Award issues; Draft & finalize e-mail to Michael St. John regarding Arbitration Award and rent issues requested	1.0	
26-Jan-17	Review and analyze Michael St. John draft report and draft MNOI analysis per Santa Barbara County Mobilehome Rent Control Ordinance; Analyze Ordinance provisions under Section 11-6 regarding calculation of rent increase issues	1.0	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
27-Jan-17	Review and analyze e-mail from Michael St. John regarding his analysis and additional questions regarding treatment regarding prior rent increases; Review and analyze documents; Draft & finalize e-mail response to Michael St. John	0.6	
30-Jan-17	Review and analyze e-mail from Michael St. John regarding updated MNOI report and analysis; T-call: Michael St. John regarding application of methodology under Ordinance to MNOI analysis; Review and analyze Michael St. John follow-up e-mail	0.8	
31-Jan-17	Review and analyze e-mails from Michael St. John regarding MNOI analysis applied to methodology under Ordinance; Draft & finalize analysis e-mail response; Follow-up e-mail exchanges with Michael St. John	1.2	
1-Feb-17	T-call: Ken Waterhouse regarding case status; Hearing preparation	0.3	
2-Feb-17	Detailed review and analysis of MNOI analyses by Michael St. John; Review and analyze e-mail by Michael St. John regarding hearing preparation and travel; Draft & finalize response; T-call: Ruben Garcia regarding status; T-call: Michael St. John; Review and analyze St. John's e-mail regarding additional accounting issues; Review and analyze attachment; Draft & finalize response	1.5	
3-Feb-17	Review and respond to Michael St. John e-mail; Review documents	0.3	
4-Feb-17	Review and analyze Michael St. John e-mail transmitting revised analyses in final form; Detailed review and analysis of analyses; Draft & finalize e-mail transmitting to client representatives; Analysis regarding preparation of exhibits and prepare document in exhibit form	2.0	
4-Feb-17	Review and analyze Board of Supervisors Agenda for hearing on Homeowners' appeal of Arbitration decision; Review and analyze Attachments (voluminous): Board letter, matrix, findings, etc.; analyze completeness; Analyze regarding proposal by Staff	4.0	
6-Feb-17	Review preparation of Arbitration Hearing Exhibits; Draft & finalize letter to Judge Long transmitting exhibits; Draft & finalize e-mail to homeowners' representatives transmitting exhibits	1.0	
6-Feb-17	Costs: Legal Assistant: Prepare new exhibits for hearing; Electronic exhibits for Judge Long (2 hours at \$125 per hour)		\$250.00
6-Feb-17	Costs: Courier: pick-up documents from Santa Barbara County		\$25.00
6-Feb-17	Costs: Courier: exhibit package to mail for Judge Long		\$25.00
6-Feb-17	Further review of documents for Board of Supervisors hearing regarding 2011 rent increase appeal	0.5	
7-Feb-17	Further preparation for Board of Supervisors hearing on homeowners' appeal: prepare outline of comments; Represent client at Board of Supervisors hearing on homeowners' appeal (case not called until an hour after County gave notice to be there); Notes to file; Conference with homeowners' representative following hearing regarding upcoming Arbitration hearing, including exhibit and witness issues and again suggesting mediation	2.5	
7-Feb-17	T-call: Ken Waterhouse (L/M)	N/C	
8-Feb-17	Review and analyze e-mails from Hamrick (2) regarding wants to call Ken Waterhouse as witness with many questions, and transmitting voluminous new exhibits; Review and analyze voluminous exhibits provided by homeowners; Draft and finalize e-mail forwarding homeowner exhibits to client representatives; T-calls: Ken Waterhouse and Ruben Garcia regarding same; Research regarding settlement agreements with Santa Barbara County regarding electrical infrastructure; e-mails with client representatives regarding same; T-call from Ruben Garcia regarding documents received and will send etc.; Review of hearing transcript from 11/18/16 hearing; Draft & finalize e-mail forwarding hearing transcript to homeowners; Preparation of witness examination outline for continued examination of Dr. Michael St. John	7.0	
8-Feb-17	Costs: Legal Assistant: Prepare electronic exhibits for Clerk of Ordinance per their Request (1 hour)		\$125.00

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
9-Feb-17	Further review and analyze of voluminous exhibits just received from homeowners; e-mail exchanges with Ruben Garcia and Ken Waterhouse and Michael St. John regarding exhibits and hearing preparation issues; Further preparation of examination outline for Michael St. John; Review and analyze St. John exhibits; Preparation of outline of potential examination issues for Ken Waterhouse; Prepare for meeting with Mr. Waterhouse and Dr. St. John; Prepare list of topics to cover and exhibits to review	4.5	
9-Feb-17	Meeting with Ken Waterhouse and Dr. Michael St. John to prepare for Arbitration hearing; Follow-up e-mail of documents	2.0	
9-Feb-17	Costs: Courier correspondence and disk to Margo Wagner at Santa Barbara County		\$35.00
9-Feb-17	Costs: Legal Assistant: Update Park Owner's exhibit and hearing binders; Prepare additional Park Owner Exhibits		\$125.00
9-Feb-17	Costs: copies of Park Owner and Homeowner Exhibits		\$38.50
10-Feb-17	Represent Park Management at continued Arbitration Hearing on homeowners' Petition disputing 2016 Rent Increase before Judge Long at Santa Barbara County Board of Supervisors Hearing Room; Conduct direct examination of Michael St. John; Defend Cross-Examination of Michael St. John by homeowners' representatives; Defend recall cross-examination of Ken Waterhouse by homeowner representatives; Represent client at hearing to address issues of exhibits, closing briefing, etc.; Notes to file; Conferences with client representatives	7.0	
10-Feb-17	Costs: Copy of Nomad Village Rent Control Arbitration Hearing Reporter's Transcript for February 10, 2017 Arbitration Hearing		\$771.85
15-Feb-17	T-call: Ken Waterhouse regarding status	N/C	
15-Feb-17	Detailed review and analysis of PUC Complaint by homeowner representatives and introduced as exhibit at Arbitration Hearing; Review and analyze cover sheet by PUC referencing PUC Rules of Practice; Detailed review and analysis of PUC Rules of Practice	2.5	
16-Feb-17	Text to Ken Waterhouse regarding status	N/C	
17-Feb-17	Review and analyze e-mail from Lindse Davis requesting to extend briefing schedule for opening brief regarding 2016 Rent Arbitration; Draft & finalize response; Draft & finalize e-mail to client representatives regarding same; Review and analyze Davis e-mail requesting even more delay	0.5	
17-Feb-17	T-call: Ken Waterhouse regarding status and Park Management does not want more delay	N/C	
21-Feb-17	T-call: Ken Waterhouse regarding status	N/C	
24-Feb-17	Draft & finalize e-mail response to Lindse Davis regarding her request for additional time regarding Park Management's response to 2016 Rent arbitration and regarding case status	0.4	
24-Mar-17	Review and analyze Shari Jennings e-mail regarding rent increase questions regarding 2016 and 2017; Draft & finalize response and further e-mail exchange	0.3	
25-Mar-17	Detailed review and analysis of homeowner's Post Hearing Opening Brief; Review and analyze select cases referenced therein; Analysis and outlining regarding claims made to which to respond; Begin outlining points for Park Owners post Arbitration Hearing brief	6.0	
27-Mar-17	Review and respond to Ruben Garcia e-mail regarding conference call	N/C	
28-Mar-17	T-call: Michael St. John regarding status, post arbitration briefing, etc.	0.3	
1-Apr-17	Detailed review and analysis of record of Arbitration Hearing proceedings: Arbitration Hearing transcripts and select Arbitration Exhibits; Notes to file; Analysis for preparation of Park Management's post Arbitration Hearing brief; Legal research for preparation of post Arbitration Hearing Brief	6.0	
2-Apr-17	Drafting of Park Management's Post Arbitration Hearing Brief; Review and analyze Record: Transcript and Exhibits for preparation of brief	5.0	
3-Apr-17	Further drafting of Park Management's Post Arbitration Hearing Brief; Review and analyze Record: Transcript and Exhibits for preparation of brief	2.0	
4-Apr-17	Further drafting of Park Management's Post Arbitration Hearing Brief; Review and analyze Record: Transcript and Exhibits for preparation of brief; Review and analysis of Petitioners' Exhibits admitted and excluded from evidence in their post hearing submission	4.0	

JAMES P. BALLANTINE, ATTORNEY AT LAW

DATE	DESCRIPTION OF PROFESSIONAL SERVICES PERFORMED/EXPENSE INCURRED	HOURS	EXPENSE
5-Apr-17	Revise and finalize Park Management's Post Arbitration Hearing Brief; Review and analyze Record: Transcript and Exhibits for preparation of brief; Assemble billing statements for professional fees incurred reallting to the proceedings; Draft, revise and finalize declaration of James P. Ballantine in support of summary of accounts for professional fees	5.0	
	Miscellaneous copies and expenses - for entire period		\$85.50
	TOTAL HOURS	<u>215.9</u>	HOURS
		TIMES	<u>\$450.00</u> PER HOUR
	TOTAL FOR HOURS		\$97,155.00
	TOTAL FOR EXPENSES		<u>\$4,899.55</u>
	TOTAL FOR HOURS AND EXPENSES FOR PERIOD		<u>\$102,054.55</u>

DECLARATION OF SERVICE BY E-MAIL

I, LISA M. PAIK, declare:

I am, and was at the time of the service hereinafter mentioned, over the age of 18 years and not a party to the within action. My business address is 329 East Anapamu Street, Santa Barbara, California 93101, and I am a resident of Santa Barbara County, California.

On April 5, 2017, I served the foregoing document described as DECLARATION OF JAMES P. BALLANTINE, ESQ. IN SUPPORT OF SUMMARY OF ACCOUNTS on the interested parties in this action by e-mailing as follows:

Judge David W. Long
Creative Dispute Resolution
3155 Old Conejo Road – Box 7
Thousand Oaks, CA 91320
e-mail: [judgelong@cdrmediation.com](mailto:judgetlong@cdrmediation.com)
e-mail: SL@cdrmediation.com

Lindse Davis
Nomad Village Homeowners Representative
4280 Calle Real, Space 133
Santa Barbara, California 93103
e-mail: LindseD@aol.cm
Ph. 967-6857

Don Grady
County of Santa Barbara
Real Property Division
Courthouse East Wing, Second Floor
1105 Santa Barbara Street
Santa Barbara, CA 93101
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I caused such document to be e-mailed to the above e-mail addresses.

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

Executed on April 5, 2017, at Santa Barbara, California.