
Subject: Fwd: FW: SAYEGH - Decl Kolodji and Memorandum re Borson Notice

From: Nuha Sayegh <nuha@recovery-compass.org>

To: Eric Jones <eric@recovery-compass.org>

Date Sent: Thursday, November 6, 2025 9:09:53 PM GMT-08:00

Date Received: Thursday, November 6, 2025 9:10:14 PM GMT-08:00

Attachments: 2025 11 06 [Filed] R's Decl Kolodji and Memo Borson Ntc.pdf

1 KIRK A. KOLODJI, ESQ. (SBN 327031)
2 KOLODJI FAMILY LAW, PC
3 35 N. Lake Avenue, Suite 710
Pasadena, CA 91101
Email: kirk@kolodjifamilylaw.com
310-691-9671

Electronically FILED by
Superior Court of California,
County of Los Angeles
11/6/2025 8:40 PM
David W. Slayton, Clerk of Court

Attorneys for Respondent NUHA SAYEGH

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES—PASADENA COURTHOUSE**

In re Marriage of:

FAHED SAYEGH,

Petitioner.

and

NUHA SAYEGH.

Respondent.

LASC CASE NO.: 25PDFL01441
(r/w 25PDRO01246 (her related DV Matter)
(r/w 25PDRO01260 (his related DV Matter)

**KEECH DECLARATION OF KIRK A.
KOLODJI, ESQ.; MEMORANDUM OF
POINTS AND AUTHORITIES**

Date: November 19, 2025
Time: 8:30 AM
Dept.: PDL

**Assigned to Hon. Joel L. Lofton, Judge
Presiding**

1 DECLARATION OF KIRK A. KOLODJI, ESQ.

2 I, KIRK A. KOLODJI, ESQ. hereby declare as follows:

3 1. I am an attorney at law, duly licensed to practice before all of the Courts of
4 the State of California, and am the attorney for Respondent NUHA SAYEGH ("Mother",
5 "Wife", and "Nuha") in her above-referenced dissolution matter, and related domestic
6 violence restraining order matters, with Petitioner FAHED SAYEGH ("Father",
7 "Husband", and "Fahed").

8 2. If called upon as a witness, I could and would testify competently as to the
9 truthfulness of the following facts, all of which are within my own personal knowledge
10 except for those stated on information and belief, and as to those, I am informed and
11 believe them to be true. I request that the court receive this declaration into evidence as
12 my direct testimony pursuant to *Code of Civil Procedure* sections 2009 and 2015.5,
13 *Rules of Court*, rule 5.118(c), *Reifler v. Superior Court* (1974) 39 Cal. App. 3d 479, and
14 *Marriage of Stevenot* (1984) 154 Cal. App. 3d 1051.

15 3. This declaration is not intended to be, nor should it be construed as a
16 waiver of any information protected by any applicable privilege including privacy,
17 confidentiality, attorney-client privilege or the attorney work-product doctrine. The
18 matters set forth herein were stated or observed in non-privileged settings and are not
19 the result of privileged work-product. I have no client authority to waive any applicable
20 privilege, including attorney-client privilege or the attorney work-product doctrine.

21 4. I offer this declaration in support of Wife's for attorney's fees and costs
22 under Family Code section 6344 related to prevailing on the related restraining order
23 matters, and to supplement the Keech Declaration filed on October 27, 2025 in the
24 Dissolution Matter, to preserve the record regarding the exhibits introduced in evidence
25 by Wife at the DV Trial, to establish the reasonableness of my fees in connection with
26 any future application by Wife under Family Code section 2030 in the Dissolution
27 Matter.

1 5. I intend to represent Wife in connection with my attorney fee request
2 under Family Code section 6344 fees for fees incurred with my firm at the hearing on
3 November 19, 2025 under the holding of *Marriage of Borson* (1974) 37 Cal.App.3d 632.
4 I have coordinated with new counsel prior to filing this declaration.

5 6. This Declaration will be filed and served prior to Wife's substitution of
6 attorney being filed and served with the Court to preserve Wife's right to seek these
7 attorney's fees directly from Husband under the holding of *Borson* and related cases.

8 7. In my retainer agreement with Wife client has a provision concerning my
9 right to seek these attorney's fees even after Wife is no longer my attorney. This
10 provision from our retainer agreement, that Wife signed on 10/06/2025, is set forth
11 below:

12 “In the event that Client does not immediately pay all outstanding
13 attorney's fees, costs and interest upon the termination of the Attorney-
14 Client relationship, Attorney shall have the absolute right and is fully
15 authorized by Client to seek payment thereof by filing a motion for
16 attorneys' fees and costs against Client's spouse or opposing party to
17 obtain payment of Client's outstanding fees and costs owed to Attorney
18 (*Borson Motion*). Client agrees and acknowledges that Client's execution
19 of this Agreement constitutes Client's irrevocable consent and
20 authorization to the filing of such a motion (*Borson Motion*). Client agrees
21 that Client shall cooperate and execute all documents necessary for
22 Attorney to properly file a *Borson Motion*, including but not limited to,
23 Client's Declaration and an Income and Expense Declaration. Client
24 agrees to pay all attorney's fees, costs and interest related to the
25 preparation, filing and hearing on such motion. Client agrees and
26 understands that once such a motion is filed, Client cannot settle the Case
27 without a determination of the fee motion by the court or by a separate
28 signed written agreement with Attorney. Client agrees that Attorney shall
be given formal notice of all mediations, arbitrations, hearings,
conferences, trial setting conferences, settlement conferences and trials
(and continuances thereon) wherein attorney's fees and costs are in issue,
and that no judgment or settlement may be approved or entered by the
Court without the opportunity for Attorney to be heard regarding the
payment of Client's outstanding attorney's fees owed to Attorney pursuant
to Attorney's *Borson Motion*.”

8. To date, I have only received \$4,000 from Wife as payment towards her
outstanding attorneys' fees with my office.

1 **REVISED AMOUNT INVOLVED – THE AMOUNT OF ATTORNEY'S FEES REQUEST**

2 9. Under Family Code section 6344, Wife seeks **\$16,306.42** in attorney's
 3 fees and costs from Husband at the hearing on November 19, 2025 to be ordered
 4 payable to Kirk A. Kolodji (and directly enforceable by Kirk A. Kolodji) under Family
 5 Code section 272. This **\$16,306.42** attorney fee request includes **\$14,473.64** in
 6 attorney's fees and costs through the Restraining Order Hearing on October 15, 2025,
 7 plus **\$1,107.78** in DV related attorney's fees through 11/06/2025 (see Paragraph 11
 8 below), plus **\$725.00** in additional anticipated fees and costs (see Paragraph 12 below)
 9 based on being the prevailing party. Wife reserves the right to seek fees based on her
 10 need and Husband's ability under Family Code section 2030, and under the *Marriage of*
 11 *Borson* to the time of trial, as detailed in the billing statements attached as Exhibit A,
 12 and detailed in the chart below in Paragraph 10 not ordered on 11/19/2025.

13 10. Wife's attorney's fees are reflected in my redacted billing statements for
 14 billing statements from 10/06/2025 – 11/06/2025, true and correct copies of which are
 15 attached hereto and incorporated herein by reference as **EXHIBIT A** and hereby
 16 incorporated by reference. A summary of the fees and costs is as follows:

<u>Invoice #</u>	<u>Date Range</u>	<u>Fees</u>	<u>Costs</u>	<u>Total</u>	<u>Pmt Rec'd</u>
1143-01	10/06/25 – 10/15/25	\$13,910.00	\$563.64	\$14,473.64	\$4,000
1143-02	10/15/25 – 11/06/25	\$4,955.00	\$132.36	\$5,087.36	\$0
		\$18,865.00	\$696.00	\$19,561.00	\$4,000

23 11. From 10/15/2025 through 11/06/2025, Wife incurred **\$1,107.08** connected
 24 to the hearing on the attorney's fees set for November 19, 2025, detailed as follows:
 25
 26
 27
 28

	<u>DATE</u>	<u>USER</u>	<u>DESCRIPTION</u>	<u>TIME</u>	<u>PRICE</u>	<u>TOTAL</u>
1	10/17/2025	Jennefer Nava	Update case file following hearing	0.1	\$125	\$12.50
2	10/17/2025	Kirk Kolodji	Email to opposing party with copy of Restraining Order After Hearing and Minute Orders and update on upcoming hearing and request for curbside exchanges	0.3	\$350	\$105.00
3	10/24/2025	Kirk Kolodji	Draft Keech Declaration for Domestic Violence Restraining Order application	1.7	\$350	\$595.00
4	10/27/2025	Kirk Kolodji	Review and respond to meet and confer email from opposing party regarding attorney fee issue and request to set meet and confer concerning motion for reconsideration; Confirm agreement to accept service by email of Keech Declaration	0.2	\$350	\$70.00
5	10/27/2025	Kirk Kolodji	Finalize Keech Declaration and Memorandum of Points and Authorities; E-file; Serve by email	0.8	\$350	\$280.00
6	10/27/2025	Kirk Kolodji	E-filing (Keech Declaration)	1	\$20	\$20.14
7	10/28/2025	Jennefer Nava	Update case file with Keech Declaration and Motion for reconsideration and Notice of Lis Pendens	0.2	\$125	\$25.00
8	10/31/2025	Jennefer Nava	Update case file in preparation for 11/19/2025 hearing	0.3	\$125	\$37.50
9	11/6/2025	Kirk Kolodji	Draft Declaration of Kirk A. Kolodji; and Memorandum of Points and Authorities concerning Borson; E-file; Serve by email	1.5	\$350	\$525.00
10	11/6/2025	Kirk Kolodji	E-filing (Declaration of Kirk A. Kolodji and Memorandum of Points and Authorities)	1	\$20	\$20.14
11	11/6/2025	Kirk Kolodji	Review notes from hearing on October 15 2025 concerning exhibits introduced into evidence	0.3	\$350	\$105.00
12			TOTAL			\$1,107.78

12. I anticipate spending an additional 1.5 hours, or \$525 to appear at the
 13 hearing on 11/19/2025, and it will cost \$200 to obtain the transcript for the hearing of
 14 10/15/2025. The transcript for the hearing of 10/15/2025 will be needed by new counsel
 15 to address Husband's Motion for Reconsideration set for hearing on January 6, 2025
 16 and other related attacks by Husband to the DV Restraining Order After Hearing of
 17 October 15, 2025. In total, I request an additional **\$725.00** in DV related attorney's fees
 18 and costs under Family Code section 6344.

1 **PRESERVATION OF RECORD CONCERNING RESTRAINING ORDER HEARING**

2 13. At the DV hearings on October 15, 2025, the following exhibits were
3 introduced into evidence by Wife.

- 4 A. **EXHIBIT B**¹ – Picture of 11/03/2023 headbutt on lip (picture taken
5 in the early morning on 11/04/2023)
- 6 B. **EXHIBIT F** – Pictures of 01/18/2022 incident (3 pictures)
- 7 C. **EXHIBIT H**² – Picture of 06/08/2025 incident
- 8 D. **EXHIBIT I (1-4)** – Pictures of 07/2021 incident, with Exhibit I-1 a
9 picture of the broken windshield
- 10 E. **EXHIBIT J**³ – Picture of 11/03/2023 incident with timestamp from
11 Petitioner's phone taken on 11/04/2023 at 2:49 am.

12 14. Husband has filed a Motion for Reconsideration under CCP section 1008,
13 set for hearing on January 6, 2025, and other attacks on the October 15, 2025 Order
14 After Restraining Order Hearing, including Respondent's Notice of Intent to Move for
15 New Trial, filed on October 31, 2025 under CCP sections 657 and 659.

16 15. As such, to preserve the record for Wife's new counsel, I am attaching
17 true and correct copies of the exhibits introduced into evidence by Wife at that hearing.

18 16. There were additional acts of domestic violence, and additional evidence
19 concerning Husband's domestic violence against Wife, that will be provided to Wife's
20 new counsel concerning other incidents of domestic violence, that were not introduced

21
22
23 ¹ This was designated Exhibit C in the Supplemental Declaration filed on October 10, 2025 in Wife's DV
24 matter.

25 ² This was designated Exhibit D in the Supplemental Declaration filed on October 10, 2025 in Wife's DV
26 matter.

27 ³ This is the same picture as Exhibit B introduced at the DV Trial, or attached as Exhibit C to the
28 Supplemental Declaration filed on October 10, 2025 in Wife's DV Matter, but with the timestamp.

1 in evidence at the hearing on October 15, 2025. These will be available, if needed, at
2 any hearing brought by Husband under CCP section 1008, 657, 659, etc.

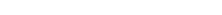
3 | CONCLUSION

4 17. At the hearing on 11/19/2025, Husband should be ordered to pay
5 **\$16,306.42** in Wife's attorney's fees and costs directly payable to KIRK A. KOLODJI,
6 ESQ. and directly enforceable under Family Code section 272, for attorney's fees and
7 costs related to the 10/15/2025 DV Matters.

8 18. Wife's attorney's fees and costs incurred with my firm that are not ordered
9 on 11/19/2025 should be reserved to the time of trial, or the time of any pre-trial request
10 of Wife, under Family Code section 2030 based on Wife's need and Husband's ability to
11 pay.

12 19. I intend to seek those fees under the holding of *Marriage of Borson* at said
13 hearing on behalf of Wife who will then be my former client.

I declare under penalty of perjury, under the laws of the state of California, that
the foregoing is true and correct. Executed on 11/06/2025 at Pasadena, California.



KIRK A. KOLODJI, E.S.Q.

MEMORANDUM OF POINTS AND AUTHORITIES

I. BORSON MOTION FOR ATTORNEY'S FEES FOR PRIOR ATTORNEY

Here, at the time of hearing, Wife's former attorney, myself, will seek the Family Code section 6344 attorney fees and costs in the sum of **\$16,306.42** as the prevailing party at the 10/15/2025 DV hearings, including additional fees related to the 11/19/2025 hearing on the attorney's fees and costs. There is a long line of cases supporting the ability of a former attorney to seek their attorneys' fees going back to *Borson*.

Additionally, Wife seeks to preserve her Family Code section 2030 fees incurred with my firm for any future application by Wife under Family Code section 2030 (which is not now before the Court) to the time of trial, under *Marriage of Borson* (1974) 37 Cal.App.3d 632, for any fees incurred with my firm that are not ordered on 11/19/2025.

Here, Wife incurred attorney's fees in connection with this Restraining Order Application, including the attorney's fees request portion set for hearing on 11/19/2025.

Under *In re Marriage of Kelso* (1998) 67 Cal.App.4th 374, a *Borson* Motion must be filed prior to the filing of the Substitution of Attorney.

Here, this request for fees under Section 6344 is sought by a former attorney for Wife, who gives notice in this Declaration and Memorandum of Points and Authorities.

In *Kelso* the wife's former attorney, before substituting out of the case, timely filed notification under *Borson* for these attorney's fees and costs sought. Here, those fees are sought under Family Code section 6344 at the hearing on November 19, 2025, and under Family Code section 2030 at the time of trial (or pre-trial application by Wife).

Wife seeks **\$16,306.42** as the prevailing party under Family Code section 6344, which should be ordered directly payable and enforceable by Kirk A. Kolodji.

Respectfully Submitted,

KOLODJI FAMILY LAW, PC

Dated: 11/06/2025

KIRK A. KOLODJI, ESQ., Attorney for
Respondent NUHA SAYEGH

EXHIBIT A

Kolodji Family Law, PC

INVOICE

35 N. Lake Avenue, Suite 710
Pasadena, CA 91101

Invoice # 1143-02
Date: 11/06/2025
Due Upon Receipt

NUHA SAYEGH

1143 - SAYEGH, NUHA

Marriage of SAYEGH, FAHED and NUHA (and related DVROs)

Services

Type	Date	Notes	Quantity	Rate	Total
Service	10/17/2025	Update case file following hearing	0.10	\$125.00	\$12.50
Service	10/17/2025	Update case files with pleadings from dissolution matter and rulings on restraining order, and email client; Draft Demand for Production of Documents, and Form Interrogatories	2.00	\$125.00	\$250.00
Service	10/17/2025	Draft income and expense declaration	0.40	\$125.00	\$50.00
Service	10/17/2025	Email to opposing party with copy of Restraining Order After Hearing, and Minute Orders, and update on upcoming hearing, and request for curbside exchanges	0.30	\$350.00	\$105.00
Service	10/17/2025	Finalize Form Interrogatories, Set One; Serve by email	0.20	\$350.00	\$70.00
Service	10/17/2025	Revise and finalize Demand for Production of Documents, Set 1; Serve by email	0.50	\$350.00	\$175.00
Service	10/17/2025	Email to client regarding upcoming hearing dates	0.10	\$350.00	\$35.00
Service	10/20/2025	Update File	0.10	\$125.00	\$12.50
Service	10/20/2025	Review deeds obtained regarding [REDACTED] [REDACTED]; Email to client	0.30	\$350.00	\$105.00
Service	10/20/2025	Teleconference with client regarding status of case	0.40	\$350.00	\$140.00
Service	10/20/2025	Cross check [REDACTED] [REDACTED]	0.50	\$125.00	\$62.50
Service	10/21/2025	Draft NOTICE OF LIS PENDENS (PENDENCY OF ACTION)	0.70	\$125.00	\$87.50
Service	10/21/2025	Review and revise Notice of Pending Action	0.20	\$350.00	\$70.00

Service	10/23/2025	Draft NOTICE OF INTENT TO SEEK 271 SANCTIONS	0.70	\$125.00	\$87.50
Service	10/23/2025	Finalize Notice of Pending Action, and Notice of Family Code Section 271 Sanctions; Prepare both for service by mail; Email to opposing party and opposing counsel	0.70	\$350.00	\$245.00
Service	10/24/2025	Draft two emails to client regarding status of case, and email received this morning	0.50	\$350.00	\$175.00
Service	10/24/2025	Teleconference with client regard her Income and Expense Declaration	0.60	\$350.00	\$210.00
Service	10/24/2025	Calculate [REDACTED] [REDACTED]; Draft attachments to Income and Expense Declaration	1.50	\$125.00	\$187.50
Service	10/24/2025	Email client regarding payments	0.10	\$125.00	\$12.50
Service	10/24/2025	Draft [REDACTED] [REDACTED]	1.00	\$125.00	\$125.00
Service	10/24/2025	Email client court forms; Send for signature and review via Clio Draft	0.20	\$125.00	\$25.00
Service	10/24/2025	Draft Keech Declaration for Domestic Violence Restraining Order application	1.70	\$350.00	\$595.00
Service	10/24/2025	Revise client's Income and Expense Declaration; Email to client for her review and approval	0.40	\$350.00	\$140.00
Service	10/24/2025	Draft XSpouse based on Income and Expense Declaration	0.20	\$350.00	\$70.00
Service	10/25/2025	Review and respond to email to detailed email from opposing party, and reply with request to meet and confer by phone or in person with Mr. Quinones present; Review notes from DV hearing; Email opposing party Exhibit H, and Exhibits I1-4; Review his Supplemental Declaration (with further objectionable material); Review methods to remove pleadings from DV case files	1.20	\$350.00	\$420.00
Service	10/25/2025	Teleconference with client regarding email from opposing party, and preparation of paperwork for Monday	0.50	\$350.00	\$175.00
Service	10/25/2025	Revise Income and Expense Declaration; Email to client	0.30	\$350.00	\$105.00
Service	10/27/2025	Email to client regarding follow up from Saturday regarding her Income and Expense Declaration; Four attempted phone calls to client to follow up regarding her Income and Expense Declaration	0.10	\$350.00	\$35.00

Service	10/27/2025	Review and respond to client's email of Sunday night	0.10	\$350.00	\$35.00
Service	10/27/2025	Review and respond to meet and confer email from opposing party regarding attorney fee issue, and request to set meet and confer concerning motion for reconsideration; Confirm agreement to accept service by email of Keech Declaration	0.20	\$350.00	\$70.00
Service	10/27/2025	Finalize Keech Declaration and Memorandum of Points and Authorities; E-file; Serve by email	0.80	\$350.00	\$280.00
Service	10/28/2025	Update case file with Keech Declaration and Motion for reconsideration, and Notice of Lis Pendens	0.20	\$125.00	\$25.00
Service	10/28/2025	Emails to client regarding recent filings	0.10	\$350.00	\$35.00
Service	10/31/2025	Update case file in preparation for 11/19/2025 hearing	0.30	\$125.00	\$37.50
Service	11/04/2025	Draft: Update client file with Notice filed by Husband on October 31, 2025; Email to client	0.20	\$175.00	\$35.00
Service	11/05/2025	Draft Amended Notice of Lis Pendens	0.20	\$125.00	\$25.00
Service	11/06/2025	Draft Declaration of Kirk A. Kolodji; and Memorandum of Points and Authorities concerning Borson; E-file; Serve by email	1.50	\$350.00	\$525.00
Service	11/06/2025	Review notes from hearing on October 15, 2025 concerning exhibits introduced into evidence	0.30	\$350.00	\$105.00
Services Subtotal					\$4,955.00

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	10/23/2025	Postage: Priority Mail (Ntc of Lis Pendens, and 271 Ntc) - opposing party	1.00	\$11.90	\$11.90
Expense	10/23/2025	Postage: Postage (Notice of Lis Pendens and 271 Ntc to opposing counsel)	2.00	\$0.66	\$1.32
Expense	10/23/2025	Postage: Certified Mail (Notice of Pending Action, and 271 Notice) to opposing party and opposing counsel	2.00	\$6.93	\$13.86
Expense	10/23/2025	Notary: Notary expense (Notice of Pending Action)	1.00	\$65.00	\$65.00
Expense	10/27/2025	e-filing at \$20.14: E-filing (Keech Declaration)	1.00	\$20.14	\$20.14
Expense	11/06/2025	e-filing at \$20.14: E-filing (Declaration of Kirk A. Kolodji, and Memorandum of Points and	1.00	\$20.14	\$20.14

Authorities)	Expenses Subtotal	\$132.36
	Subtotal	\$5,087.36
	Total	\$5,087.36

Detailed Statement of Account

Other Invoices

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1143-01	10/15/2025	\$14,473.64	\$4,000.00	\$10,473.64

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1143-02	11/06/2025	\$5,087.36	\$0.00	\$5,087.36
				Outstanding Balance \$15,561.00
				Amount in Trust \$0.00
				Total Amount Outstanding \$15,561.00

Please make all amounts payable to: Kolodji Family Law, PC

Payment is due upon receipt.

Kolodji Family Law, PC

INVOICE

35 N. Lake Avenue, Suite 710
Pasadena, CA 91101

Invoice # 1143-01
Date: 10/15/2025
Due Upon Receipt

NUHA SAYEGH

1143 - SAYEGH, NUHA

Marriage of SAYEGH, FAHED and NUHA (and related DVROs)

Services

Type	Date	Notes	Quantity	Rate	Total
Service	10/06/2025	In office conference with client; Gather case facts; Draft Response and Request for Dissolution of Marriage; Draft Declaration Under Uniform Child Custody and Jurisdiction Act; Review pleadings and documents from client	3.20	\$350.00	\$1,120.00
Service	10/06/2025	SEAN KOLODJI: Gather notes for Supplemental Declaration regarding restraining order; Review evidence and pleadings; Review facts and evidence for client DVRO Declaration	3.20	\$175.00	\$560.00
Service	10/06/2025	SEAN KOLODJI: Serve substitution of attorney form	0.20	\$175.00	\$35.00
Service	10/07/2025	Create file and downloaded all pleading from both DV cases	2.00	\$125.00	\$250.00
Service	10/07/2025	Review pleadings in Husband's DV case file; Leave voice message for Mother's dependency lawyer to confirm matter is closed	0.30	\$350.00	\$105.00
Service	10/07/2025	SEAN KOLODJI: Call with client to review facts for client DVRO Declaration	0.20	\$175.00	\$35.00
Service	10/07/2025	SEAN KOLODJI: Email to client to gather exhibits for client DVRO Declaration	0.20	\$175.00	\$35.00
Service	10/07/2025	SEAN KOLODJI: Review case file and pleadings	1.50	\$175.00	\$262.50
Service	10/07/2025	SEAN KOLODJI: Teleconference with client to gather facts for client DVRO Declaration	4.00	\$175.00	\$700.00
Service	10/07/2025	SEAN KOLODJI: Draft and edit client DVRO Declaration, assemble Exhibits	2.00	\$175.00	\$350.00
Service	10/08/2025	Edit supplemental declaration	0.20	\$125.00	\$25.00

Service	10/08/2025	Finalize Supplemental Declaration of Client for her DV matter; Serve by email; E-file	2.50	\$350.00	\$875.00
Service	10/08/2025	Review and revise Requests to Strike	0.50	\$350.00	\$175.00
Service	10/08/2025	SEAN KOLODJI: Revise client's Supplemental DVRO Declaration, and prepare Exhibits	7.50	\$175.00	\$1,312.50
Service	10/09/2025	Teleconference with client regarding communication from DCFS	0.40	\$350.00	\$140.00
Service	10/09/2025	Email to client about paystubs	0.20	\$125.00	\$25.00
Service	10/09/2025	Draft Income and Expense Declaration	0.90	\$125.00	\$112.50
Service	10/09/2025	Review and revise Income and Expense Declaration; Email to client	0.30	\$350.00	\$105.00
Service	10/09/2025	Finalize Request to Strike and Objection regarding Wife's Restraining Order, and proposed order; E-file; Serve by email	1.20	\$350.00	\$420.00
Service	10/09/2025	Finalize Request to Strike regarding Husband's Restraining Order, and proposed order; E-file; Serve by email	0.70	\$350.00	\$245.00
Service	10/09/2025	Review and respond to opposing party's email regarding subpoena directed to minor child Mia	0.20	\$350.00	\$70.00
Service	10/09/2025	Review and respond to messages from client	0.20	\$350.00	\$70.00
Service	10/09/2025	SEAN KOLODJI: Draft Request to Strike Exhibits and Subpoena	3.40	\$175.00	\$595.00
Service	10/09/2025	SEAN KOLODJI: Communications with client preparing for DVRO hearing	0.20	\$175.00	\$35.00
Service	10/10/2025	Review orders on Motions to Strike; Serve by email on opposing party; Review opposing party's Notice of Withdrawal of Exhibits; Emails to client regarding the same	0.40	\$350.00	\$140.00
Service	10/10/2025	SEAN KOLODJI: Communications with client preparing for DVRO hearing	0.40	\$175.00	\$70.00
Service	10/12/2025	Review emails from client and opposing party; Respond to one email from client	0.40	\$350.00	\$140.00
Service	10/13/2025	SEAN KOLODJI: Update case file	0.40	\$175.00	\$70.00
Service	10/13/2025	SEAN KOLODJI: Review evidence and court filings; communications to client re: opposing party's exhibits	0.50	\$175.00	\$87.50
Service	10/13/2025	SEAN KOLODJI: Call with client re upcoming DVRO hearing	0.70	\$175.00	\$122.50
Service	10/14/2025	Update File for tomorrow's hearing	1.50	\$125.00	\$187.50

Service	10/14/2025	SEAN KOLODJI: Review of exhibits for DVRO hearing	2.50	\$175.00	\$437.50
Service	10/14/2025	SEAN KOLODJI: Draft chronology regarding history of abuse; Preparation for DVRO hearing	5.00	\$175.00	\$875.00
Service	10/14/2025	SEAN KOLODJI: In office meeting with client re: DVRO hearing; Gather further case facts and evidence	3.20	\$175.00	\$560.00
Service	10/14/2025	In office conference with client regarding tomorrow's hearing; Finalize Response and Request for Dissolution of Marriage; E-file and Serve; Review email from opposing party	1.20	\$350.00	\$420.00
Service	10/15/2025	Assist attorney during court hearing	4.00	\$125.00	\$500.00
Service	10/15/2025	Appear at court hearing; Prepare for court hearing; Travel to and from court hearing; Meeting with client following court hearing	5.00	\$350.00	\$1,750.00
Service	10/15/2025	SEAN KOLODJI: Prepare for today's DVRO hearing	0.80	\$175.00	\$140.00
Service	10/15/2025	SEAN KOLODJI: Travel to and from court	0.30	\$175.00	\$52.50
Service	10/15/2025	SEAN KOLODJI: Accompany client and assist attorney at hearing, take notes	3.50	\$175.00	\$612.50
Service	10/15/2025	SEAN KOLODJI: In office meeting with client after court hearing	0.50	\$175.00	\$87.50
Services Subtotal					\$13,910.00

Expenses

Type	Date	Notes	Quantity	Rate	Total
Expense	10/06/2025	Filing Fee: Filing fee (cost to obtain Petition and Decl UCCJEA from court portal)	1.00	\$7.80	\$7.80
Expense	10/06/2025	e-filing at \$20.14: E-filing (substitution of attorney on both DV cases)	2.00	\$20.14	\$40.28
Expense	10/08/2025	e-filing at \$20.14: E-filing (Supplemental Decl)	1.00	\$20.14	\$20.14
Expense	10/09/2025	e-filing at \$20.14: E-filings (objections/Requests to Strike, and proposed Orders in both DV Matters)	2.00	\$20.14	\$40.28
Expense	10/14/2025	Filing Fee: First appearance fee for Response and Request for Dissolution of Marriage	1.00	\$435.00	\$435.00
Expense	10/14/2025	e-filing at \$20.14: E-filing (Response and Decl. UCCJEA)	1.00	\$20.14	\$20.14

Expenses Subtotal	\$563.64
Subtotal	\$14,473.64
Total	\$14,473.64
Payment (10/15/2025)	-\$4,000.00
Balance Owing	\$10,473.64

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
1143-01	10/15/2025	\$14,473.64	\$4,000.00	\$10,473.64
			Outstanding Balance	\$10,473.64
			Amount in Trust	\$0.00
			Total Amount Outstanding	\$10,473.64

Please make all amounts payable to: Kolodji Family Law, PC

Payment is due upon receipt.

Petitioner's

EXHIBIT B

(10/15/25 DV)



Petitioner's

EXHIBIT F

(10/15/25 DV)







Petitioner's

EXHIBIT H

(10/15/25 DV)

9:01



5G

85%



June 8

12:42 PM

...

From Me >



Petitioner's

EXHIBIT I-1

(10/15/25 DV)

8:58

100%

July 11, 2021

5:49 AM

LIVE



Petitioner's

EXHIBIT I-2

(10/15/25 DV)

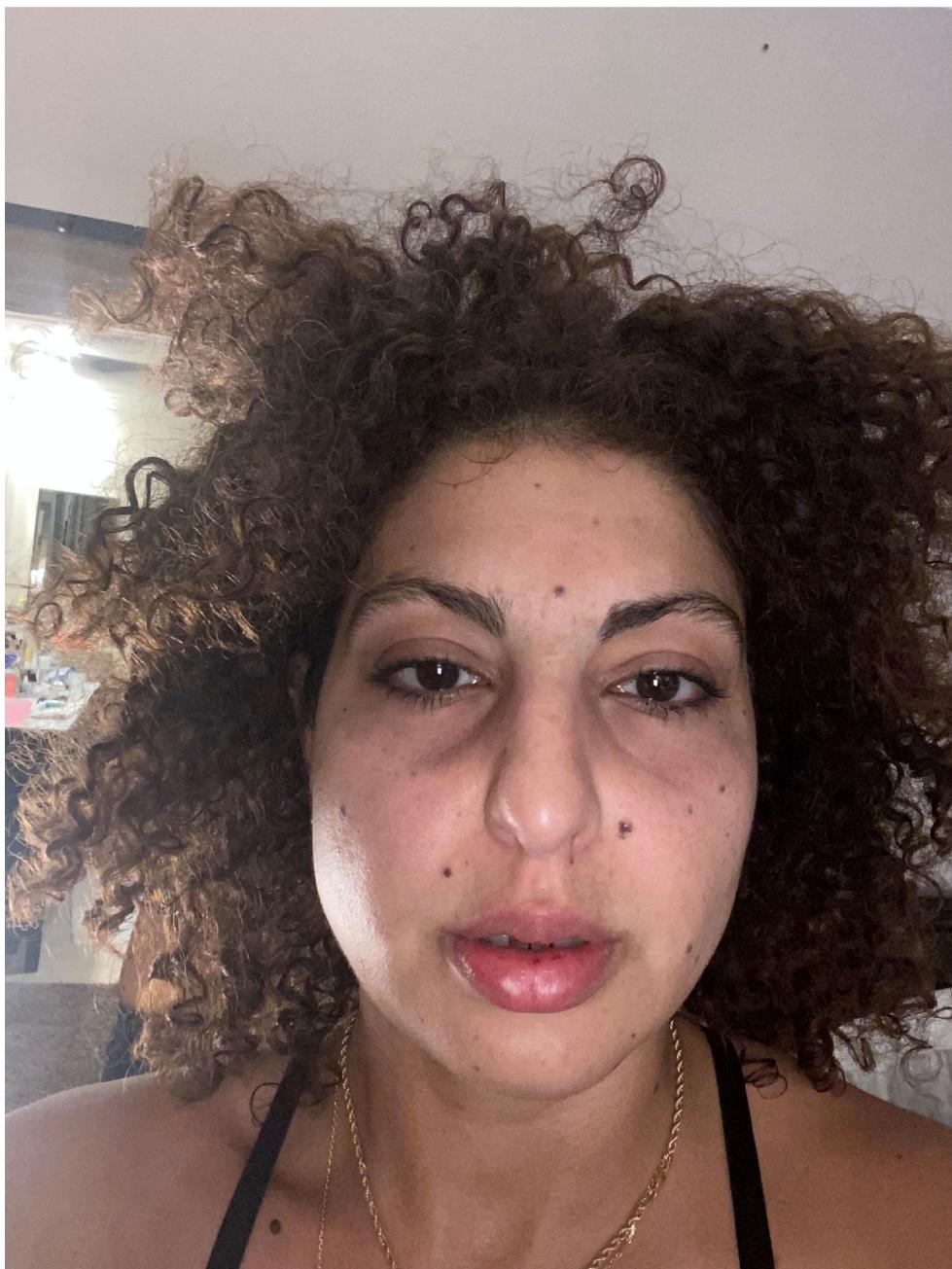
8:58

100%

July 11, 2021

8:12 AM

LIVE



Petitioner's

EXHIBIT I-3

(10/15/25 DV)

8:58

100%

July 11, 2021

9:09 AM

LIVE ▾



Petitioner's

EXHIBIT I-4

(10/15/25 DV)

8:58

100%

July 11, 2021

2:52 PM

LIVE ▾



Petitioner's

EXHIBIT J

(10/15/25 DV)

9:02



5G 85%

November 4, 2023

2:59 AM



PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 35 N. Lake Avenue, Suite 710, Pasadena, CA 91101.

On 11/06/2025, I served the within described as:

KEECH DECLARATION OF KIRK A. KOLODJI, ESQ.; MEMORANDUM OF POINTS AND AUTHORITIES

- BY MAIL:** By mailing a copy to each of the persons named below in a separate envelope bearing first-class postage prepaid, addressed to that person at the address set out below that person's name. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Pasadena, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

**FAHED SAYEGH
1226 SONOMA DR
ALTADENA, CA 91001
Email: freddy@thefoxxfirm.com**

**Gilbert Quiñones, Esq.
Law Offices of Gilbert Quiñones
206 S Stimson Ave
La Puente, CA 91744
Email: gqlaw2004@yahoo.com**

I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct, and that this declaration is executed on
11/06/2025, at Pasadena, California.

KIRK A. KOLODJI, ESQ.