

Lewis N. Stoddard, Bar No. 7766
Halliday, Watkins & Mann, P.C.
300 W. Main St., Ste. 150
Boise, ID 83702
Phone: 801-355-2886
Facsimile: 801-328-9714
lewis@hwmlawfirm.com
Attorney for Plaintiff | HWM File No. ID21698

**IN THE DISTRICT COURT OF THE SECOND JUDICIAL DISTRICT,
OF THE STATE OF IDAHO IN AND FOR THE COUNTY OF NEZ PERCE**

DPW Enterprises LLC and Mountain Prime 2018 LLC, Plaintiffs, v. Jeremy L. Bass; Dwayne Pike; and Unknown Parties in Possession of the real property commonly known as: 1515 21st Ave., Lewiston, ID 83501, Defendants.	DECLARATION OF ATTORNEY FEES AND COSTS Case No.: CV35-24-1063
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STATE OF IDAHO)
 : ss.
County of Ada)

LEWIS N. STODDARD, being first duly sworn, on oath deposes and says:

- 1.) That I am one of the attorneys of record for plaintiff.
- 2.) I have been actively engaged in the practice of law in Idaho since 2007.
- 3.) The hourly rate for legal services provided to Plaintiffs in this matter is \$300 per hour, which is a reasonable rate compared to hourly rates of other attorneys in this area with similar experience of my own. By way of further explanation, I have spent the past decade specializing in the representation of creditors in secured transaction litigation including judicial foreclosures and

post-foreclosure actions for ejectment and possession. I am licensed to practice in Alaska, Idaho, Washington (Inactive), Wyoming, Montana, and Tennessee. I am admitted to the federal courts and bankruptcy courts of Alaska, Idaho, and Montana and before the 9th Circuit Court of Appeals and routinely appear on state court matters and federal bankruptcy court matters in Alaska, Idaho and Montana.

4.) Attached hereto as Exhibit A are true and correct copies of the billings for legal services provided to Plaintiffs in this matter necessary to secure Judgment in Plaintiff's favor as against Defendant Jeremy Bass. The basis for attorney fees is Idaho Code §§ 6-316, 12-121, and I.R.C.P. 54(e)(1) and (2). While a second Defendant, Dwayne Pike has also opposed this matter, billing entries for work performed in relation to Mr. Pike have been omitted and redacted from the attached billings.

5.) A Summary of those costs and attorney fees incurred by Plaintiffs thus far, with the exception of time spent on preparing an opposition to Defendant Bass' Motion for Stay, preparation of the present Affidavit as well as time to be spent at the hearing on Bass' present motions set for December 6, 2024 and review of any Reply Memorandums and preparation for the hearing are as follows:

ATTORNEY'S FEES:

Attorney:	Rate:	Hours:	TOTAL FEES:
Lewis N. Stoddard	\$300.00	24.1	\$7,230.00

COSTS:

Complaint Filing Fee:	\$233.91
Service of Process on Defendant Bass:	\$45.00
Additional Filing Costs:	\$18.00

In addition to the foregoing, and not included in the billings are 3 hours to respond to Defendant

Bass' request for stay, 2 hours to prepare this Affidavit, and counsel would anticipate .5 hours to review reply materials submitted by Mr. Bass, and 1.5 hours to prepare for and participate in the hearings set for December 6, 2024 resulting in an additional 7 hours not reflected in the attached billings. This would bring the total fees to \$9,330.00

6.) To the best of my knowledge and belief, the costs and fees claimed are correct and are in compliance with I.R.C.P. 54(d)(5).

CERTIFICATION UNDER PENALTY OF PERJURY

I certify under penalty of perjury pursuant to the law of the state of Idaho that the foregoing is true and correct.

DATED This November 27, 2024.

HALLIDAY WATKINS & MANN, P.C.

By: /s/ Lewis N. Stoddard
Lewis N. Stoddard
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this November 27, 2024, a true and correct copy of the above and foregoing document was served, which service was effectuated by the method indicated below and addressed as follows:

Jeremy L. Bass 1515 21 st Ave Lewiston, ID 83501	<input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Email/iCourt
Ken Nagy Idaho Legal Aid Services, Inc. kennagy@idaholegalaid.org <i>Counsel for Dwayne Pike</i>	<input type="checkbox"/> U.S. Mail <input checked="" type="checkbox"/> Email/iCourt

/s/ Lewis N. Stoddard
Lewis N. Stoddard

Invoice Date

11/24/2024



HALLIDAY
WATKINS
& MANN

Invoice Number

710867

HALLIDAY, WATKINS & MANN, P.C.
ATTORNEYS AT LAW
8851 SOUTH SANDY PARKWAY, SUITE 200
SANDY, UT 84070
801-355-2886

DPW Enterprises, LLC
10028 S. Morgan Grove Way
Sandy, UT 84092

RE: DPW Enterprises, LLC, N/A
vs. Jeremy L. Bass, Current occupant and Dwayne Pike

Property Address: 1515 21st Ave., Lewiston, ID 83501
OURFILE: ID21698

BILLING SUMMARY:

HOURLY FEES

DATE	HOURLY DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
11/05/2024	review and analyze order re: summary judgment and correspond with client re: same (.4): [REDACTED] (Stoddard, Lewis)	No	\$300.00	[REDACTED]	[REDACTED]
11/07/2024	BASS- begin preparing 54(b) Judgment re: Bass. - Non-Recoverable BASS- begin preparing 54(b) Judgment re: Bass. (Stoddard, Lewis)	No	\$300.00	0.40	\$120.00
11/07/2024	Review and analyze Defendant Bass Motion to Reconsider, Memorandum in Support and Motion for Stay - Non-Recoverable Review and analyze Defendant Bass Motion to Reconsider, Memorandum in Support and Motion for Stay (Stoddard, Lewis)	No	\$300.00	1.30	\$390.00
11/19/2024	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

11/22/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Prepare opposition memorandum to Defendant Bass Motion for Reconsideration. (Stoddard, Lewis)	No	\$300.00	2.90	\$870.00
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TOTALS

DESCRIPTION	AMOUNT
Total Hourly Fees on this invoice	\$1,710.00
Total Amount Due	\$1,710.00

Thank you for the opportunity to be of service.

Invoice Date

10/25/2024



HALLIDAY
WATKINS
& MANN

Invoice Number

707282

HALLIDAY, WATKINS & MANN, P.C.
ATTORNEYS AT LAW
8851 SOUTH SANDY PARKWAY, SUITE 200
SANDY, UT 84070
801-355-2886
[REDACTED]

DPW Enterprises, LLC
10028 S. Morgan Grove Way
Sandy, UT 84092

RE: DPW Enterprises, LLC, N/A
vs. Jeremy L. Bass, Current occupant and Dwayne Pike

Property Address: 1515 21st Ave., Lewiston, ID 83501
OURFILE: ID21698

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
10/01/2024	Filing Cost ID - Eviction Complaint Non-Recoverable	No	\$6.00

HOURLY FEES					
DATE	HOURLY DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
10/01/2024	[REDACTED] Review and prepare non-opposition to Bass Motion to amend to add verification (.3) (Stoddard, Lewis)	No	\$300.00	[REDACTED]	
10/02/2024	[REDACTED]				
10/08/2024	Attorney Fee ID - Eviction Hourly Non- Recoverable; Prepare for and participate in hearing on Jeremy Bass Motion to Dismiss. (Stoddard, Lewis)	No	\$300.00	1.30	\$390.00
10/10/2024	[REDACTED]				

10/16/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable; correspond with Defendant Bass re: non-service of MSJ response (.3); review and analyze MSJ opposition and supporting affidavit by Bass (.9). (Stoddard, Lewis)	No	\$300.00	1.20	\$360.00
10/16/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable; prepare Reply Memo in Support of Motion for Summary Judgment re: Bass. (Stoddard, Lewis)	No	\$300.00	2.80	\$840.00
10/22/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable; prepare for and participate in hearing on Plaintiff's Motion for Summary Judgment. (Stoddard, Lewis)	No	\$300.00	1.40	\$420.00
10/22/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable; review and analyze three separate Sur Reply briefs filed by Defendant Bass. (Stoddard, Lewis)	No	\$300.00	0.70	\$210.00

TOTALS

DESCRIPTION	AMOUNT
Total Costs on this invoice	\$6.00
Total Hourly Fees on this invoice	
Total Amount Due	

Thank you for the opportunity to be of service.

Invoice Date

09/18/2024

HALLIDAY
WATKINS
& MANN

Invoice Number

702731

HALLIDAY, WATKINS & MANN, P.C.
ATTORNEYS AT LAW
8851 SOUTH SANDY PARKWAY, SUITE 200
SANDY, UT 84070
801-355-2886
[REDACTED]

DPW Enterprises, LLC
10028 S. Morgan Grove Way
Sandy, UT 84092

RE: DPW Enterprises, LLC, N/A
vs. Jeremy L. Bass, Current occupant and Dwayne Pike

Property Address: 1515 21st Ave., Lewiston, ID 83501
OURFILE: ID21698

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
09/16/2024	Filing Cost ID - Eviction Motion for Summary Judgment Non-Recoverable	No	\$6.00
09/17/2024	Mailings - Other Eviction Mailings Non-Recoverable	No	\$3.15

HOURLY FEES					
DATE	HOURLY DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
09/10/2024	[REDACTED]				
09/11/2024					
09/12/2024					

09/12/2024					
09/16/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable - Correspond with clients re: execution of Declarations and further prepare Motion for Summary Judgment and Memorandum in support for filing (Stoddard, Lewis)	No	\$300.00	0.70	\$210.00
09/17/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable - Prepare for and participate in Status Conference hearing (Stoddard, Lewis)	No	\$300.00	0.90	\$270.00

TOTALS	
DESCRIPTION	AMOUNT
Total Costs on this invoice	\$9.15
Total Hourly Fees on this invoice	\$1,710.00
Total Amount Due	\$1,719.15

Thank you for the opportunity to be of service.

Invoice Date

09/09/2024

HALLIDAY
WATKINS
& MANN

Invoice Number

701647

HALLIDAY, WATKINS & MANN, P.C.
ATTORNEYS AT LAW
376 EAST 400 SOUTH, SUITE 300
SALT LAKE CITY, UTAH 84111
801-355-2886
[REDACTED]DPW Enterprises, LLC
10028 S. Morgan Grove Way
Sandy, UT 84092RE: DPW Enterprises, LLC, N/A
vs. Jeremy L. Bass, Current occupant and Dwayne PikeProperty Address: 1515 21st Ave., Lewiston, ID 83501
OURFILE: ID21698

BILLING SUMMARY:

HOURLY FEES					
DATE	HOURLY DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
08/14/2024					
08/15/2024					
08/15/2024					
08/19/2024					
08/22/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Review Answer, motion to dismiss and Memorandum filed by former owner and prepare email to client. (Stoddard, Lewis)	No	\$300.00	1.50	\$450.00

08/23/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Call with client re: litigation strategy re: former owner and negotiations with tenant. (Stoddard, Lewis)	No	\$300.00	0.20	\$60.00
08/27/2024					
08/27/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Prepare Motion for Summary Judgment against Jeremy Bass and Notice of Hearing (.3); prepare memorandum in support of motion for summary judgment against Jeremy Bass and opposition to motion to dismiss (3.7). (Stoddard, Lewis)	No	\$300.00	4.00	\$1,200.00
09/09/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Bass MSJ- Obtain hearing date and further prepare notice of hearing (.2); prepare Affidavit of Counsel in support of MSJ (.7) (Stoddard, Lewis)	No	\$300.00	0.90	\$270.00

TOTALS

DESCRIPTION

Total Hourly Fees on this invoice

Total Amount Due

Thank you for the opportunity to be of service.

Invoice Date

08/07/2024



HALLIDAY
WATKINS
& MANN

Invoice Number

697931

HALLIDAY, WATKINS & MANN, P.C.
ATTORNEYS AT LAW
376 EAST 400 SOUTH, SUITE 300
SALT LAKE CITY, UTAH 84111
801-355-2886

DPW Enterprises, LLC
10028 S. Morgan Grove Way
Sandy, UT 84092

RE: DPW Enterprises, LLC, N/A
vs. Jeremy L. Bass, Current occupant and Dwayne Pike

Property Address: 1515 21st Ave., Lewiston, ID 83501
OURFILE: ID21698

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
07/08/2024	Filing Cost ID - Eviction Complaint Non-Recoverable	No	\$233.91
08/02/2024	Service ID - Eviction Summons and Complaint Non-Recoverable	No	\$45.00
08/02/2024	Service ID - Eviction Summons and Complaint Non-Recoverable	No	\$125.00
08/02/2024	Service ID - Eviction Summons and Complaint Non-Recoverable	No	\$45.00
08/05/2024	Filing Cost ID - Eviction Affidavit of Services Recoverable	No	\$6.00

HOURLY FEES					
DATE	HOURLY DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
07/08/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Prepare Complaint for Ejectment to address 90 day PTFA extension (2.1); prepare summons for Defendants (.2); Prepare Non-Military Affidavit and run military checks (.5) (Stoddard, Lewis)	No	\$300.00	2.90	\$870.00
07/16/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Prepare update to client on status of ejectment action. (Stoddard, Lewis)	No	\$300.00	0.10	\$30.00
08/05/2024	Attorney Fee ID - Eviction Hourly Non-Recoverable Review status of service and service returns. (Stoddard, Lewis)	No	\$300.00	0.20	\$60.00

TOTALS

DESCRIPTION	AMOUNT
Total Costs on this invoice	
Total Hourly Fees on this invoice	
Total Amount Due	

Thank you for the opportunity to be of service.