

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

WELLS FARGO BANK, N.A., AS	§	
TRUSTEE FOR THE POOLING AND	§	
SERVICING AGREEMENT DATED AS	§	
OF APRIL 1, 2004 ASSET BACKED	§	Civil Action No. 3:20-cv-745-X
SECURITIES CORPORATION HOME	§	
EQUITY LOAN TRUST 2004-HE2 ASSET	§	
BACKED PASS-THROUGH	§	
CERTIFICATES, SERIES 2004-HE2,	§	
 	§	
Plaintiff,	§	
 	§	
v.	§	
 	§	
GEORGE E. DIXON	§	
 	§	
Defendant.	§	

DECLARATION OF PHILIP W. DANAHER

Pursuant to 28 U.S.C. Section 1746, I declare under penalty of perjury that the following statements are true and correct:

1. “My name is Philip W. Danaher. I am over the age of 21 years and am fully competent to make this Declaration. All statements of fact made herein are true, correct, and within my personal knowledge.

2. I am an attorney for Plaintiff Wells Fargo Bank, N.A., as Trustee for the Pooling and Servicing Agreement Dated as of April 1, 2004 Asset Backed Securities Corporation Home Equity Loan Trust 2004-HE2 Asset Backed Pass-Through Certificates, Series 2004-HE2 (“Wells Fargo” or Plaintiff”).

3. Defendant filed its Original Complaint against Defendant George E. Dixon (“Dixon”) on October 10, 2019. [ECF No. 1].

4. I am an attorney licensed to practice in the State of Texas and am a member of the bar of the United States District Court for the Eastern District of Texas. I am currently a senior attorney at the law firm of Mackie Wolf Zientz & Mann, P.C. (MWZM), with offices located in Dallas, Texas and Houston, Texas. I am in good standing with respect to the State Bar of Texas. A true and correct copy of my resume is attached hereto as **Exhibit A-1**.

5. MWZM was retained by Plaintiff to defend it against the claims brought by Dixon in his *Original Petition* to enforce Defendant's interest in certain real property as a result of a default under a loan. The legal professionals of MWZM with whom I worked in providing these services are at all relevant times attorneys licensed by the State of Texas, in good standing and experienced in the areas of business, real estate, and commercial litigation practice. Without waiving the attorney-client privilege, the subject matter of the counsel and representation provided to Plaintiff by MWZM legal professionals included, but was not limited to: review and analysis of the loan documents at issue; review and analysis of the history of this matter; preparation and filing of the original answer and counterclaim; completing service; drafting motions for default judgment; conducting legal research; drafting responses to defendants' motions; multiple conferences with Defendant's mortgage servicer regarding all of these items and this matter generally. These activities are set forth in chronological order by name and date on the invoices included with the motion as **Exhibit B**. The hours set forth for each activity were actually expended on the topics stated.

6. The reasonable incurred attorneys' fees are \$4,228.80 in defending Plaintiff and prosecuting Defendant's claims to enforce its interest in certain real property as a result of the default of under the loan agreement between the parties. The hourly rate charged is \$215.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants.

7. I have become familiar with the legal services necessary to handle claims based on and the reasonable charges for such legal services in the United States District Court for the Northern District of Texas and within the State of Texas.

8. In considering reasonable attorneys' fees in this case, I have considered the time and labor involved; the difficulty of the issues presented; the experience, reputation, and ability of the attorneys involved in pursuing the claims; the skills requisite to properly conduct the case; customary charges of the Bar and awards in similar cases; and the amount in controversy.

9. Based upon my knowledge and experience with similar litigation in the state and federal courts in Texas over the last ten years, and applying the facts and factors set out above, it is my opinion that the hourly rate of up to \$215.00 per hour for attorneys and \$95.00 per hour for paralegals and legal assistants are reasonable and customary, and the sum of \$4,228.80 is reasonable attorneys' fees for representing Plaintiff with regard to its enforcement of its interest in certain real property as a result of a default of under the loan agreement.

10. If any party files post-judgment motion, a reasonable fee for Plaintiff would be \$2,500.00. If this case is appealed to the court of appeals, a reasonable fee for the Defendant would be an additional \$15,000.00. If this case is appealed to the United States Supreme Court, a reasonable fee for the Defendant would be an additional \$2,500.00."

FURTHER DECLARANT SAYETH NAUGHT.

Signed this April 9, 2021


PHILIP W. DANAHER

EXHIBIT A-1

Philip W. Danaher

14160 N. Dallas Pkwy., Suite 900, Dallas, Texas 75254

EDUCATION: **Tulane University Law School**, New Orleans, LA
J.D., May 2011

University of Dallas, Irving, TX
B.A., Politics, May 2007

Activities: College Rugby Player, 2003 – 2007, Study Abroad in Rome, Italy, 2004

EXPERIENCE: **Mackie Wolf Zientz & Mann, P.C.**, Dallas, Texas
Senior Attorney, April 2018 – April 2019; June 2019 to Present
Represent financial institutions concerning consumer finance litigation, title curative matters, and other real estate related matters where I managed a large volume of litigation matters. Oversee and manage work of associate attorneys and paralegals. Handle all aspects of federal and state litigation practice including state and federal bench trials; drafting appellate briefs; drafting and arguing motions; attending court hearings; preparing and responding to written discovery; deposing adverse parties; attending mediations; and negotiating and drafting settlement agreements.

Associate Attorney, April 2013 – April 2018

I worked as an associate attorney until April 2018 when I was promoted to Senior Attorney.

The Wolf Law Firm, P.C., Southlake, Texas
Attorney, April 2019 – June 2019

Represented railroad and trucking companies in high exposure litigation matters. Handled litigation defense on behalf of insurers under duty to defend.

Contract Attorney

September 2011 – April 2013

Reviewed discovery materials during pretrial stages of numerous litigation matters; organized discovery materials to be used at trial; analyzed and organized documents for privilege log; organized and led a team of attorneys to work on special projects. Conducted legal review and approve disaster area loans for individuals after Hurricane Sandy. Assisted the law firm Gibson Dunn in an internal review for a large financial services company.

Law Office of Al White, Kansas City, MO

Law Clerk, June 2009 – September 2012

Worked as a law clerk for a solo practitioner during law school and for a while after passing the bar. Conducted research on a variety of criminal and civil law issues; drafted memos, motions, and briefs.

City Attorney's Office, New Orleans, LA

Law Clerk, Summer 2010

Assisted the City Attorney's office during the summer of 2010 as a law clerk. Conducted research on a variety of law topics including constitutional law, state law preemption, zoning, and insurance ratings; drafted intra-office memos and assisted supervising attorney with drafting motions and appellate briefs.

GMAC Mortgage, Dallas, TX

Loan Counselor, December 2007 – July 2008

Resolved delinquent mortgage payment issues by setting up payment arrangements and offering other loss mitigation options.

Affinity Mortgage, Dallas, TX

Loan Officer, July 2007 – September 2007

Originated mortgages and gathered necessary documentation needed for a successful rate lock; originated both first and second liens.

LICENSES: State Bar of Texas; United States District Court for the Northern, Southern, Eastern, and Western Districts of Texas; Fifth Circuit Court of Appeals.

ASSOCIATIONS: University of Dallas Alumni in the Law-Vice President, Dallas Bar Association, St. Thomas More Society, Groundhog Rugby Alumni Association, Eagle Scout, 2002.

PUBLICATIONS: *Lienholders Beware of Lien-Stripping Practice* – Legal League 100 Quarterly, Fall 2018

EXHIBIT B

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 153 MEADOWCREEK RD
 COPPELL, TX 75019
 Our File: 12-002076-670-6

MWZM Case No.: 12-002076-670-6; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

COSTS					
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT		
03/30/2020	Court Costs for filing complaint.- Recoverable	Yes	\$400.00		
HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
03/30/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Research and obtain SCRA/Pacer results for each named defendant prior to filing the Original Complaint.					
03/30/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Prepared civil coversheet prior to filing in federal court.					
03/30/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Finalized Original Complaint and Certificate of Interested Persons/Corporate Disclosure Statement prior to filing with the court.					
03/30/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Prepared Summons Request form prior to filing in federal court.					
03/30/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	2.00	\$430.00
Prepare original complaint.					
03/30/2020	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.40	\$86.00
Review new matter.					
04/02/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Receipt and review of summons issued for the defendant.					
04/02/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Correspondence with process server requesting attempted service of named defendant.					
04/02/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00

04/02/2020	Senior Attorney Fee-Hourly Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
[REDACTED]					
04/03/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Correspondence with process server regarding first attempt to serve George E. Dixon.					
04/06/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Correspondence with process server regarding second attempt to serve George E. Dixon.					
04/08/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Correspondence with process server regarding third attempt and address confirmed to serve George E. Dixon.					
04/15/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Correspondence requesting an update on service from process server on George E. Dixon.					
04/15/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Assess [REDACTED]					
04/15/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.10	\$21.50
Review file for status of service.					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$400.00
Total Hourly Fees Since Last Billing	\$842.00
Current Amount Due	\$1,242.00
Payments Received	\$0.00
Total Amount Due	\$1,242.00



Invoice Date

05/08/2020

Mackie Wolf Zientz & Mann, P.C.
 14160 N. Dallas Pkwy Ste. 900
 Dallas, TX 75254
 Phone: (214) 635-2650
 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 153 MEADOWCREEK RD
 COPPELL, TX 75019
 Our File: 12-002076-670-6

MWZM Case No.: 12-002076-670-6; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

COSTS			
DATE	COST DESCRIPTION	RECOVERABLE	AMOUNT
04/18/2020	Process Server Costs - Attempted Service on George E. Dixon- Recoverable	Yes	\$87.00
04/22/2020	Process Server Costs -Service on George E. Dixon- Recoverable	Yes	\$70.00
05/05/2020	E-File Recording Cost- Recoverable	Yes	\$4.80
05/05/2020	Filing Costs- Recoverable	Yes	\$30.00

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
04/20/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Correspondence with process server regarding forth attempt and address confirmed to serve George E. Dixon.					
04/20/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.20	\$19.00
Correspondence with process server to try service by certified mail restricted delivery.					
04/20/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Coordinate on service of defendant by certified mail restricted delivery.					
04/28/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Correspondence with process server requesting update on service for George E. Dixon.					
04/28/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Correspondence with process server regarding George E. Dixon being successfully served.					
04/28/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review status of service on defendant.					
04/29/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Receipt and review of Return of Service for George E. Dixon.					
04/29/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.10	\$21.50

Receipt and review of return of service.					
05/05/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.40	\$86.00
[REDACTED]					
05/05/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.40	\$86.00
Prepare notice of lis pendens.					
05/05/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Prepared correspondence to parties regarding notice of lis pendens.					
05/05/2020	Senior Attorney Fee-Hourly- Recoverable Cronenwett, Mark	Yes	\$215.00	0.20	\$43.00
Review and execute notice of lis pendens.					

TOTALS	
DESCRIPTION	AMOUNT
Total Costs Since Last Billing	\$191.80
Total Hourly Fees Since Last Billing	\$474.50
Current Amount Due	\$666.30
Previous Balance	\$1,242.00
Payments Received	\$0.00
Total Amount Due	\$1,908.30



Invoice Date
06/26/2020

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 Fax: (214) 635-2686

INVOICE

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 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No: [REDACTED]
 Reference:
 Property Addr: 153 MEADOWCREEK RD
 COPPELL, TX 75019
 Our File: 12-002076-670-6

MWZM Case No.: 12-002076-670-6; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
05/12/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review docket for answer to complaint in light of deadline for the same.					
05/14/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket to verify if the defendant has filed an answer.					
05/15/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Research and obtain SCRA/Pacer results for each named defendant prior to filing the Motion for Default Judgment.					
05/15/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Combined supporting exhibits to the Motion for Default Judgment and Request for Entry.					
05/15/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Finalized Motion for Default Judgment and Request for Entry prior to filing with the court.					
05/15/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Prepared correspondence to parties regarding Motion for Default Judgment and Request for Entry.					
05/15/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	1.50	\$322.50
Prepare Motion for Default Judgment.					
05/18/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Receipt and review of clerk's entry of default.					
05/29/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Receipt and review of Return of Service for George Dixon with signed green card from process server.					
06/02/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review file, confirm delivery of motion for default judgment.					
06/08/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the Motion for Default Judgment filed 5/15/20.					

06/09/2020	Senior Attorney Fee-Hourly Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review file for ruling on motion for default judgment.					
06/24/2020	Senior Attorney Fee-Hourly Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review docket for ruling on motion for default judgment.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$737.00
Current Amount Due	\$737.00
Previous Balance	\$1,908.30
Payments Received	\$1,908.30
Total Amount Due	\$737.00



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 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No. [REDACTED]
 Reference:
 Property Addr: 153 MEADOWCREEK RD
 COPPELL, TX 75019
 Our File: 12-002076-670-6

MWZM Case No.: 12-002076-670-6; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
07/08/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on motion for default judgment filed on 5/15/20.					
07/14/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on motion for default judgment.					
07/15/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review file for upcoming deadlines and ruling on motion for default judgment.					
07/20/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
[REDACTED]					
07/20/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.40	\$86.00
[REDACTED]					
07/21/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
[REDACTED]					
07/21/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
[REDACTED]					
07/21/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
[REDACTED]					
07/27/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
[REDACTED]					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$343.00
Current Amount Due	\$343.00
Previous Balance	\$2,645.30

Payments Received	\$2,645.30
Total Amount Due	\$343.00



Invoice Date

10/20/2020

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 Dallas, TX 75254
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 Fax: (214) 635-2686

INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No. [REDACTED]
 Reference:
 Property Addr: 153 MEADOWCREEK RD
 COPPELL, TX 75019
 Our File: 12-002076-670-6

MWZM Case No.: 12-002076-670-6; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
08/18/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review docket for ruling on motion for default judgment.					
08/31/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the motion for default judgment.					
09/11/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review docket for entry of order on motion for default judgment.					
09/21/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the motion for default judgment we filed 5/18/20.					
10/01/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Coordinate on submitting proposed order on the Motion for default judgment to judge by email as required pursuant to judge's procedures.					
10/01/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Correspondence with court providing the proposed default judgment via email as required pursuant to judge's procedures.					
10/13/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the motion for default judgment, still no ruling.					
10/13/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Research and obtain SCRA/Pacer results for each named defendant due to hold removal.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$271.50
Current Amount Due	\$271.50
Previous Balance	\$2,988.30
Payments Received	\$2,988.30

Total Amount Due

\$271.50



Invoice Date
01/22/2021

Mackie Wolf Zientz & Mann, P.C.
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INVOICE

PHH Mortgage Corporation
 1Mortgage Way
 Mail Stop SV-22
 Mt. Laurel, NJ 08054

Loan No. [REDACTED]
 Reference:
 Property Addr: 153 MEADOWCREEK RD
 COPPELL, TX 75019
 Our File: 12-002076-670-6

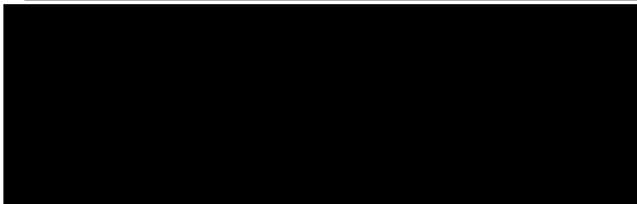
MWZM Case No.: 12-002076-670-6; Loan Type: HEL; Case Type: Litigation; Filing Date: NO; Chapter: NO

BILLING SUMMARY:

HOURLY FEES					
DATE	FEE DESCRIPTION	RECOVERABLE	RATE	HOURS	AMOUNT
10/30/2020	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review docket for ruling on motion for summary judgment.					
11/03/2020	Senior Attorney Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the motion for default judgment filed 5/15/20, [REDACTED]					
11/16/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the motion for default judgment filed 5/15/20, [REDACTED]					
11/23/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the motion for default judgment filed 5/15/20, [REDACTED]					
12/28/2020	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the motion for default judgment, [REDACTED]					
01/05/2021	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.10	\$21.50
Review file, further assess strategy for resolution of issue.					
01/12/2021	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Receipt and review of Order denying without prejudice Motion for Default Judgment and notice of date to refile the motion.					
01/12/2021	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	1.00	\$215.00
Review order on motion for default judgment, prepare amended motion for default judgment.					
01/13/2021	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Research and obtain SCRA/Pacer results for each named defendant prior to filing the Amended Motion for Default Judgment.					

01/13/2021	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Prepared correspondence to parties regarding Amended Motion for Default Judgment.					
01/13/2021	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Finalized Amended Motion for Default Judgment prior to filing with the court.					
01/19/2021	Paralegal Fee-Hourly- Recoverable Lenehan, Rebecca	Yes	\$95.00	0.30	\$28.50
Review court case status on docket for ruling on the Amended Motion for Default Judgment.					
01/20/2021	Senior Attorney Fee-Hourly- Recoverable Danaher, Philip	Yes	\$215.00	0.20	\$43.00
Review docket for ruling on amended motion for default judgment.					

TOTALS	
DESCRIPTION	AMOUNT
Total Hourly Fees Since Last Billing	\$579.00
Current Amount Due	\$579.00
Previous Balance	\$3,259.80
Payments Received	\$3,259.80
Total Amount Due	\$579.00



RE: GEORGE E. DIXON

Loan#

Property Address: 153 MEADOWCREEK RD, COPPELL, TX 75019

Firm File#: 12-002076-670 Firm Case#: 12-002076-670-6

Attorney: Philip Danaher

BILLING SUMMARY:

HOURLY FEES

DATE	HOURLY DESCRIPTION	RATE	HOURS	AMOUNT
01/27/2021	Paralegal Fee-Hourly, Review court case status on docket for ruling on the Amended Motion for Default Judgment, [REDACTED] Lenehan, Rebecca	\$95.00	0.30	\$28.50
02/08/2021	Paralegal Fee-Hourly, Review court case status on docket for ruling on the Amended Motion for Default Judgment [REDACTED] Lenehan, Rebecca	\$95.00	0.30	\$28.50
02/22/2021	Paralegal Fee-Hourly, Review court case status on docket for ruling on the Amended Motion for Default Judgment filed on 1/13/21, [REDACTED] Lenehan, Rebecca	\$95.00	0.30	\$28.50
03/01/2021	Paralegal Fee-Hourly, Review court case status on docket for ruling on the Amended Motion for Default Judgment filed on 1/13/21, [REDACTED] [REDACTED] Lenehan, Rebecca	\$95.00	0.30	\$28.50
03/17/2021	Paralegal Fee-Hourly, Review court case status on docket for ruling on the Amended Motion for Default Judgment filed on 1/13/21, [REDACTED] [REDACTED] Lenehan, Rebecca	\$95.00	0.30	\$28.50
03/30/2021	Paralegal Fee-Hourly, Review court case status on docket for ruling on the Amended Motion for Default Judgment. Lenehan, Rebecca	\$95.00	0.30	\$28.50
04/05/2021	Senior Attorney Fee-Hourly, Receipt and review of order granting motion for default judgment. Danaher, Philip	\$215.00	0.20	\$43.00

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04/09/2021	Paralegal Fee-Hourly, Prepared draft Motion for Attorney fees, Proposed Order for attorney review. Lenehan, Rebecca	\$95.00	0.50	\$47.50
04/09/2021	Paralegal Fee-Hourly, Prepared draft Declaration of Philip W. Danaher in support of the Motion for Attorney Fees for attorney review. Lenehan, Rebecca	\$95.00	0.30	\$28.50
04/09/2021	Paralegal Fee-Hourly, Combined exhibits in support of Motion for Attorney Fees. Lenehan, Rebecca	\$95.00	0.30	\$28.50
04/09/2021	Paralegal Fee-Hourly, Prepared correspondence to parties regarding Motion for Attorney Fees Lenehan, Rebecca	\$95.00	0.30	\$28.50
04/09/2021	Senior Attorney Fee-Hourly, Coordinate on preparing motion for attorneys` fees. Danaher, Philip	\$215.00	0.20	\$43.00

TOTALS

DESCRIPTION	AMOUNT
Total Fees This Invoice	\$0.00
Total Hourly Fees This Invoice	\$390.00
Total Amount Due This Invoice	\$390.00

Thank you for the opportunity to be of service. Please submit payment with a copy of this invoice to the above address.