

THE UNITED STATES ATTORNEY'S OFFICE
DISTRICT *of* OREGON

[U.S. Attorneys](#) » [District of Oregon](#) » [News](#)

Department of Justice

U.S. Attorney's Office

District of Oregon

FOR IMMEDIATE RELEASE

Tuesday, July 12, 2022

Utah Man Sentenced to 12 Years in Federal Prison for Receiving Child Pornography

PORTLAND, Ore.—A Provo, Utah man was sentenced to federal prison today for receiving child pornography.

Jeremy David Croskey, 48, was sentenced to 144 months in federal prison and 15 years' supervised release.

According to court documents, in April 2019, special agents from FBI Portland's Child Exploitation Task Force (CETF) began working with detectives from the Yamhill County Sheriff's Office to investigate sexually explicit messages Croskey sent to a minor victim. FBI traced Croskey's messages to his home in Provo where they executed a search warrant and seized digital devices containing child pornography.

In May 2020, Croskey was also charged in Utah County, Utah, with illegally possessing a firearm, controlled substance, and drug paraphernalia. In September 2020, Croskey was indicted in Yamhill County Circuit Court on six counts of first-degree sexual abuse.

On March 29, 2022, Croskey pleaded guilty in federal court to receipt of child pornography. Croskey's plea was jointly negotiated by the U.S. Attorney's Office for the District of Oregon, the Yamhill County District Attorney's Office, and the Utah County Attorney's Office, resolving all three of his criminal cases.

U.S. Attorney Scott Erik Asphaug of the District of Oregon made the announcement.

This case was investigated by the FBI with assistance from the Yamhill County Sheriff's Office and the Provo Police Department. It was prosecuted by Natalie K. Wight, Assistant U.S. Attorney for the District of Oregon.

FBI Portland's CETF conducts sexual exploitation investigations, many of them undercover, in coordination with federal, state and local law enforcement agencies. CETF is committed to locating and arresting those who prey on children as well as recovering and assisting victims of sex trafficking and child exploitation.

Anyone who has information about the physical or online exploitation of children are encouraged to call the FBI at 1-800-CALL-FBI (1-800-225-5324) or submit a tip online at tips.fbi.gov.

Federal law defines child pornography as any visual depiction of sexually explicit conduct involving a minor. Child sexual abuse material depicts actual crimes being committed against children. Not only do these images and videos document victims' exploitation and abuse, but when shared across the internet, child victims suffer re-victimization each time the image of their abuse is viewed. To learn more, please visit the National Center for Missing & Exploited Children's website at www.missingkids.org .

This case was brought as part of Project Safe Childhood, a nationwide initiative launched in May 2006 by the Justice Department to combat the growing epidemic of child sexual exploitation and abuse. For more information about Project Safe Childhood, please visit www.justice.gov/psc.

Topic(s):

Project Safe Childhood

Component(s):

USAO - Oregon

Updated July 12, 2022

LAB TESTS WITH NO DOCTOR VISIT REQUIRED



BUY NOW

QuestDir

USNews NEWS

Home / News / Best States / Oregon News

Judge Arrested on Child Porn Allegations, Placed on Leave

Oregon's top judge for settling disputes between citizens and state agencies is facing child pornography allegations.

By [Associated Press](#)

April 11, 2022



PORTLAND, Ore. (AP) — Oregon's top judge for settling disputes between citizens and state agencies is facing child pornography allegations.

Chief Administrative Law Judge John Mann, 56, was booked into Washington County Jail last month on ten counts of first-degree encouraging child sexual abuse, The Oregonian/OregonLive reported. He was released on bail hours later.

Recommended Videos

Powered by AnyClip



NOW PLAYING

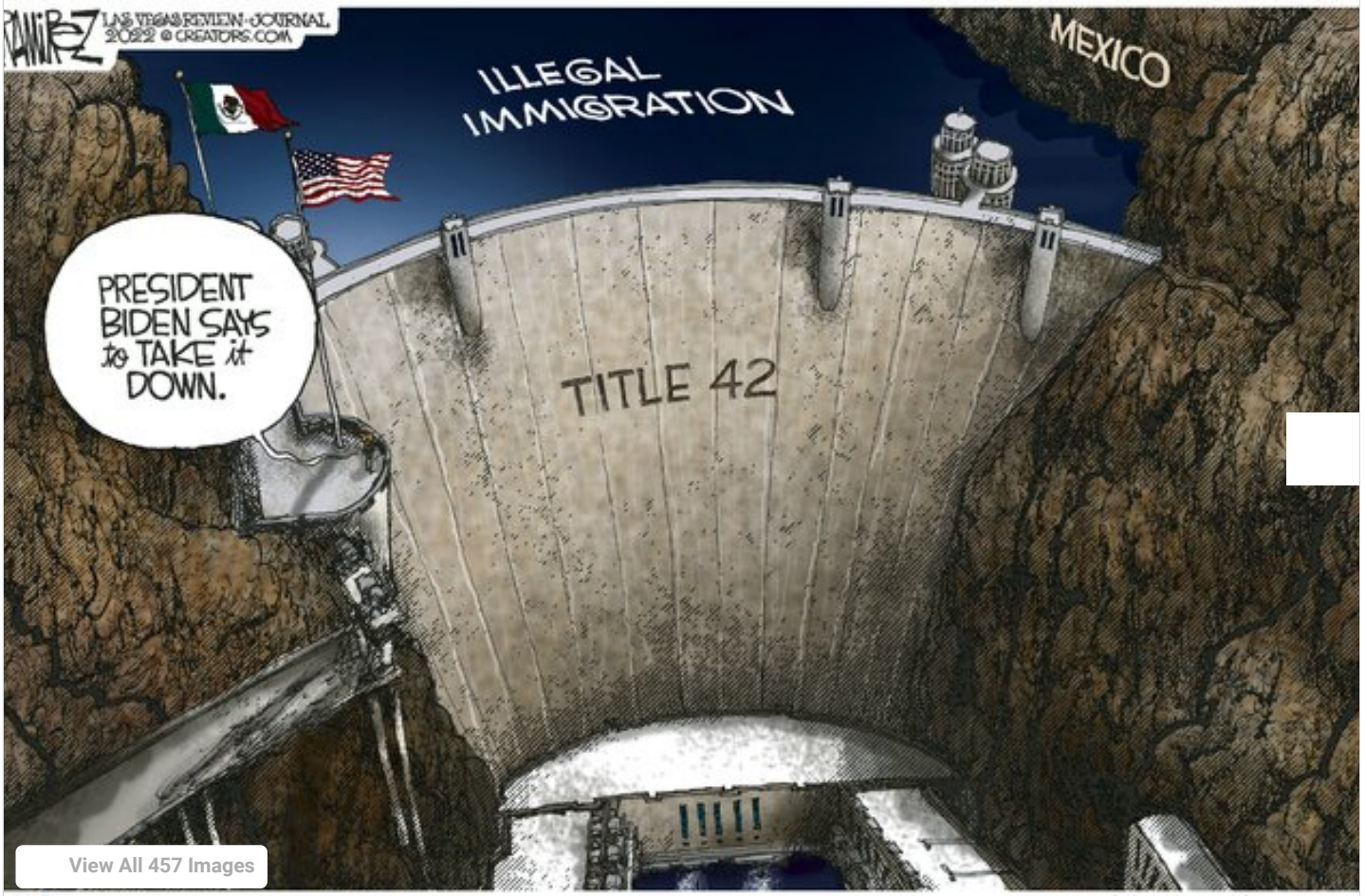


A spokesperson for the Beaverton Police Department, which investigated the case, said Mann was arraigned Monday in Washington County Circuit Court. Charles Boyle, a spokesperson for Gov. Kate Brown, said Mann had been placed on unpaid administrative leave amid the investigation.

Copies of the charges weren't yet available Monday on the state's electronic court information system, the newspaper reported.

It wasn't immediately known if Mann has a lawyer to comment on his behalf and efforts to find contact information for the judge weren't immediately successful.

Political Cartoons



[View All 457 Images](#)

"These are incredibly serious allegations," Boyle said in a statement, adding that Mann had been appointed by Brown in 2017. "We are continuing to monitor the situation and will take further action as warranted."

Mann oversaw roughly 60 judges who adjudicate thousands of cases each year brought by residents or businesses that disagree with state agency rulings mostly involving unemployment insurance, child support payments or the Department of Health Services. According to a newsletter published by the Oregon State Bar.



US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

APR 28 2021

By
Deputy Clerk

UNITED STATES OF AMERICA)	
)	Case No. 5:21-CR-50014 -001
)	
)	
v.)	18 U.S.C. § 2252A(a)(2)
)	18 U.S.C. § 2252A(b)(1)
)	18 U.S.C. § 2252A(a)(5)(B)
)	18 U.S.C. § 2252A(b)(2)
)	
JOSHUA JAMES DUGGAR)	

INDICTMENT

The Grand Jury Charges:

COUNT ONE

(Receipt of Child Pornography)

Between on or about May 14, 2019, and on or about May 16, 2019, in the Western District of Arkansas, Fayetteville Division, the Defendant, **JOSHUA JAMES DUGGAR**, knowingly received child pornography, as that term is defined by 18 United States Code Section 2256(8)(B), using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce by any means, including computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2252A(a)(2) and (b)(1).

COUNT TWO

(Possession of Child Pornography)

Between on or about May 14, 2019, and on or about May 16, 2019, in the Western District

of Arkansas, Fayetteville Division, the Defendant, **JOSHUA JAMES DUGGAR**, knowingly possessed material that contained images of child pornography, as that term is defined in Title 18, United States Code, Section 2256(8)(B), including images of minors under the age of 12, that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

The Grand Jury re-alleges and incorporates by reference herein all Counts of this Indictment.

Upon conviction of any Count of this Indictment, the defendant shall forfeit to the United States pursuant to 18 United States Code, Section 2253 the defendant's interest in:

1. any visual depiction described in 18 United States Code, Sections 2251, 2251A, or 2252, 2252A, 2252B, or 2260, or any book, magazine, periodical, film, videotape, or other matter, which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of the offenses in the Indictment;
2. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses in the Indictment; and
3. any property, real or personal, **including any and all computer equipment**, used or intended to be used to commit or to promote the commission of the offenses in the

Indictment, or any property traceable to such property, including, but not limited to computer equipment used in the commission of the offenses in the Indictment.

If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18 United States Code, Section 2253(b), incorporating by reference Title 21 United States Code, Section 853 to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

A True Bill.

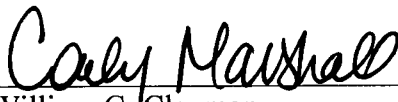
/s/Grand Jury Foreperson
Foreperson

DAVID CLAY FOWLKES
ACTING UNITED STATES ATTORNEY

By: Carly Marshall
Carly Marshall
Assistant U. S. Attorney
Arkansas Bar No. 2012173
414 Parker Avenue
Fort Smith, AR 72901
Telephone: 479-783-5125
E-mail: carly.marshall@usdoj.gov

Dustin Roberts
Dustin Roberts
Assistant U. S. Attorney
Arkansas Bar No. 2005185
414 Parker Avenue

Fort Smith, AR 72901
Telephone: 479-783-5125
E-mail: dustin.roberts@usdoj.gov

for: 
William G. Clayman
Trial Attorney
Child Exploitation and Obscenity Section
U.S. Department of Justice
D.C. Bar No. 1552464
1310 New York Avenue NW
Washington, D.C. 20005
Telephone: 202-514-5780
Email: william.clayman@usdoj.gov

When Justice Fails

A Portland Story of Fraud, Collusion & Cybercrime

Chapter 206 – The Comparison of Josh Duggar and Max Zweizig Forensic Reports

👤 Tim Rote 📁 Uncategorized 🕒 December 10, 2021 ⌵ 6 Minutes

Arbitrator Bill Crow confirmed to me that Kugler and Mosman asked him to ignore the forensic reports produced during the arbitration with Max Zweizig in order to punish me for making the Sandra Ware/Max Zweizig connection to FISA Judge Robert Kugler. Those reports were generated by forensic experts Steve Williams, Mark Cox and Justin McAnn. Justin was Zweizig's forensic expert. All three testified during the arbitration.

Crow's arbitration opinion awarding Zweizig \$70k is devoid of any references to the forensic reports or other witness testimony that confirmed Zweizig (1) was fired for attempted extortion before his false complaint of overbilling; (2) destroyed programming leading to the shutdown of his employer (Computer Fraud and Abuse Act); (3) had in his possession 500,000 identity records stolen from his employer (Zweizig was the head of the IT department and had access to all the servers); (4) partitioned his employer issued computer and 120 gig hard drive where he maintained child porn, porn, music and videos; and (5) reformatted that 120 gig hard drive on his last day of employment, falsely claiming it failed.

Crow confirmed to me that Kugler told Sandra Ware (Zweizig's girlfriend) that the forensic reports would be excluded from his 2018 employee retaliation trial should he decide to file a retaliation action for my publishing of critiques of the arbitrator for ignoring the forensic reports (See my Chapter 4). Zweizig did file said lawsuit on December 24, 2015. Crow confirmed that Zweizig was only going to be allowed to pursue \$75,000, enough to be in federal court. But once the forensic reports were excluded by Judge Marco Hernandez, Zweizig and Christiansen increased the demand to the jury to \$2 Million. That took the Judges by surprise and burned the bridge between Kugler, Ware and Zweizig. Mosman and Kugler pressed Hernandez to exclude the forensic reports on an argument that arbitrator Crow had already opined on the validity of the forensic reports. In fact Crow did not. See his arbitration Opinion here [Ex 505 Arbitrator Opinion \(https://thefirstdutyportland.files.wordpress.com/2018/05/ex-505-arbitrator-opinion.pdf\)](https://thefirstdutyportland.files.wordpress.com/2018/05/ex-505-arbitrator-opinion.pdf). He was asked to ignore the forensic reports and he did so.

Josh Duggar was just convicted for possessing and disseminating child porn. He's going to jail. Let's consider what was found on Zweizig's computer to what was found on Duggar's and compare the 2005 data (Zweizig) to the 2019 data (Duggar). I still have the hard drive and have had a new forensic report prepared.

James Fottrell, director of the Department of Justice's High Technology Investigative Unit, spoke the longest and spoke last. Over several hours on Thursday afternoon, with testimony continuing Friday, Fottrell detailed his personal forensic investigation of the three of Duggar's devices that investigators seized: a personal MacBook, an iPhone and the HP desktop in his office.

1. The Hard drive was partitioned to store the child porn:

Duggar: “the hard drive had in fact been split in two that May, with the other side using Linux — what another expert on Thursday described in testimony as “a separate computer on a computer, if you will.” [Josh Duggar Trial Computer Analyst Tells What He Saw on Computer PEOPLE.com \(https://thefirstdutyportland.files.wordpress.com/2021/12/josh-duggar-trial-computer-analyst-tells-what-he-saw-on-computer-people.com.pdf\)](https://thefirstdutyportland.files.wordpress.com/2021/12/josh-duggar-trial-computer-analyst-tells-what-he-saw-on-computer-people.com.pdf).

Zweizig: Zweizig created a drive d, where he kept his child porn, porn, music and videos. [Police Officer Williams Forensic Report 120ghd \(https://thefirstdutyportland.files.wordpress.com/2021/12/police-officer-williams-forensic-report-120ghd.pdf\)](https://thefirstdutyportland.files.wordpress.com/2021/12/police-officer-williams-forensic-report-120ghd.pdf).

2. A peer to peer program was installed to share the child porn:

Duggar: “A peer-to-peer file-sharing program, **uTorrent**, was also installed as was a media player. (It was a peer-to-peer program on the IP address at Duggar’s car lot that first caught the police’s attention in May 2019.)”

Zweizig: “this computer was at one point installed with an undetermined peer to peer file sharing program, and the shared folder contained files that the user made available to other p2p program users to copy.” See Steve Williams report. [Subsequently Mark Cox identified the peer to peer program and that it was registered to Zweizig]. “The result of this analysis reveals several dates associated with video file names in a format typically associated with file sharing websites such as PirateBay, **BitTorrent** and TorrentReactor. [Exhibit 4 Forensic Report Cox on 120 gig 120-17 \(https://thefirstdutyportland.files.wordpress.com/2019/07/exhibit-4-forensic-report-cox-on-120-gig-120-17.pdf\)](https://thefirstdutyportland.files.wordpress.com/2019/07/exhibit-4-forensic-report-cox-on-120-gig-120-17.pdf)

3. Child Porn was found:

Duggar: “For example, he said, his analysis showed the computer had thumbnail versions of the photos while he was able to also recover some deleted files and, through further examination, found evidence of downloaded and/or streamed videos like “pedomom” and “Daisy’s Destruction” as well as viewed lewd images of an 8-to-12-year-old girl.”

Zweizig: “older sisters get lesbian with little sister.” [and many more]. Steve Williams Report.

4. The Child Porn was maintained on a business computer:

Duggar: “Fottrell detailed his personal forensic investigation of the three of Duggar’s devices that investigators seized: a personal MacBook, an iPhone and the HP desktop in his office...but that HP machine was riddled with illicit material, Fottrell testified.”

Zweizig: “I was asked to perform analysis of the additional contents of the Maxtor 120gb hard drive” [Zweizig’s assigned business computer which was used by Zweizig from his home]. Steve Williams Report.

5. No one but the accused used the subject computer hard drive:

Duggar: “He reiterated the password for the Linux side: intel1988, which prosecutors argue was used by Duggar for some of his personal accounts (and also includes his year of birth). A former employee and distant Duggar relative suggested on the stand earlier Thursday they might also be aware

of it – something prosecutors ridiculed as a convenient ploy.”

Zweizig: “Following the November 12, 2003 reformatting of the hard drive [by Zweizig], the hard drive was not used or accessed and no subsequent dates or recovered files are present...” Exhibit 5 Forensic Report Cox on 120 gig Doc 116-5. (<https://thefirstdutyportland.files.wordpress.com/2019/07/exhibit-5-forensic-report-cox-on-120-gig-doc-116-5.pdf>)

6. The Police acquired custody of the hard drive before destruction:

Duggar: “Jeffrey Pryor, another special agent, testified briefly about the steps in seizing material during the 2019 search and Jeff Wofford, an executive with Covenant Eyes, testified about Duggar’s use of the program (with his content filter set for the standard “mature teen”) and how the monitoring could be evaded with a Linux partition. The defense pointed out a user could also simply not download the program on their hard drive to evade it.”

Zweizig: Returned the reformatted 120 gig hard drive to his employer. It was not until almost two years after the return that the child porn was discovered. Unlike Duggar, Zweizig did reformat the hard drive maintaining it had failed. Mark Cox opined that the hard drive had not failed, that it was not reformatted when Zweizig maintained (May 2003), but rather was reformatted on his last day, November 12, 2013. Exhibit 5 Forensic Report Cox on 120 gig Doc 116-5 (<https://thefirstdutyportland.files.wordpress.com/2019/07/exhibit-5-forensic-report-cox-on-120-gig-doc-116-5.pdf>). Because of a chain of custody issue with the 120 gig hard drive, the Police did not pursue prosecution.

Zweizig destroyed employer owned programming when reformatting the 120 gig hard drive. The programming was not found on any other server owned by his employer, servers that were controlled by Zweizig as Director of the IT department. Several experts testified that no foxpro programming could be found. After reformatting, the foxpro programming was no longer viable. Exhibit 6 Forensic Report Cox on Foxpro Files Destroyed 120-2 (<https://thefirstdutyportland.files.wordpress.com/2019/07/exhibit-6-forensic-report-cox-on-foxpro-files-destroyed-120-2.pdf>).

In a deposition, Zweizig bragged about his success that is interpreted to me how he and his attorney (Joel Christiansen) were able to dupe the jury and the court. And he testified that his immediate past attorney no longer wanted to be associated with the raping of children [after reviewing the forensic reports produced to you today]. Exhibit 12 2020-1221-MAXZWEIZIG. (<https://thefirstdutyportland.files.wordpress.com/2021/11/exhibit-12-2020-1221-maxzweizig.pdf>)

After Zweizig gave his deposition and I published it, he then attempted to suppress his own testimony PETITION FOR PRETRIAL ORDER (<https://thefirstdutyportland.files.wordpress.com/2021/11/petition-for-pretrial-order.pdf>). This time the court did not allow it.

The USDCOR allowed Zweizig to keep the forensic reports from the jury. The Court allowed a letter I sent to Kugler into the trial as one of Zweizig’s exhibits, arguing that I should be punished for critiquing the court. The court, by allowing the letter in, sent a message to me that critiques of the court will be punished by excluding evidence favoring my position about Zweizig and in other cases. Steve Williams forensic report was a part of the letter sent to Kugler. The attachment was excluded in the trial, from the jury.

Just like Josh Duggar, Zweizig used his office computer (from his home in Woodbury New Jersey) to download and disseminate child porn, porn, music and videos to and from others using a peer to peer program allowing those transfers. And just like Josh Duggar he should be in jail.

Until next time.

Advertisements



REPORT THIS AD



Published by Tim Rote

Business Owner, Author, Advocate. [View all posts by Tim Rote](#)

[Blog at WordPress.com.](#) [Do Not Sell My Personal Information](#)

1
2
3
4 IN THE CIRCUIT COURT OF THE STATE OF OREGON
5 FOR THE COUNTY OF CLACKAMAS

6 MAX ZWEIZIG, an individual,

7 Plaintiff,

8 v.

9 TANYA ROTE and TIMOTHY ROTE,
10 husband and wife; and NORTHWEST
11 HOLDING, LLC, an Oregon limited liability
12 company,

Defendants.

Case No. 19CV01547

**CORRECTED DECLARATION OF S.
WARD GREENE IN SUPPORT OF
STATEMENT OF ATTORNEY FEES,
COSTS, AND DISBURSEMENTS FOR
PLAINTIFF MAX ZWEIZIG**

13 I, S. Ward Greene, hereby declare:

- 14 1. I make this declaration based on my personal knowledge and I am competent to testify to
15 the matters herein. I am one of the attorneys for plaintiff Max Zweizig.
- 16 2. The purpose of this declaration is to attach "Exhibit 1," an itemization of attorney fees,
17 that was inadvertently omitted from the Statement of Attorney Fees, Costs, and
18 Disbursements for Plaintiff Max Zweizig filed on April 17, 2020. This declaration does
19 not otherwise supplement, change, or modify the Statement of Attorney Fees, Costs, and
20 Disbursements for Plaintiff Max Zweizig filed on April 17, 2020.
- 21 3. Attached hereto as Exhibit 1 is a true and accurate copy of the attorney fees incurred
22 including the number of hours and services provided. Due to a clerical oversight, this
23 exhibit was inadvertently omitted from my April 17, 2020 Declaration in Support of the
24 Statement of Attorney Fees, Costs, and Disbursements for Plaintiff Max Zweizig.
- 25
26

1 4. Attached hereto as Exhibit 2 is a statement of the factors to be considered under ORS
2 20.075 with additional information provided to support Plaintiff's award of attorney fees.
3 This is the same exhibit that was attached on April 17, 2020, but is provided herewith so
4 that all exhibits are attached to the same declaration.

5
6 **I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE**
7 **BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS**
8 **MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY**
9 **FOR PERJURY.**

9 DATED this 27th day of May, 2020.

10 WILLIAMS KASTNER GREENE & MARKLEY

11
12 By /s/S. Ward Greene

S. Ward Greene, OSB #774131

13 Phone: (503) 228-7967

14 Fax: (503) 222-7261

Email: wgreene@williamskastner.com

15 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I certify that I served the foregoing CORRECTED DECLARATION OF S. WARD GREENE IN SUPPORT OF STATEMENT OF ATTORNEY FEES, COSTS, AND DISBURSEMENTS FOR PLAINTIFF MAX ZWEIZIG on the following attorneys by the method indicated below on the 27th day of May, 2020:

Timothy Rote
24790 SW Big Fir Rd.
West Linn, OR 97068
Email: tim@rote-enterprises.com
Pro Se

Via First Class Mail
 Via Federal Express
 Via Facsimile
 Via Hand-Delivery
 Via E-Mail
 Via Odyssey eFile & Serve™

Tanya Rote
24790 SW Big Fir Rd.
West Linn, OR 97068
Email: tanyarote5@gmail.com
Pro Se

Via First Class Mail
 Via Federal Express
 Via Facsimile
 Via Hand-Delivery
 Via E-Mail
 Via Odyssey eFile & Serve™

Northwest Holding, LLC
c/o Timothy Rote
24790 SW Big Fir Rd.
West Linn, OR 97068
Pro Se

Via First Class Mail
 Via Federal Express
 Via Facsimile
 Via Hand-Delivery
 Via E-Mail
 Via Odyssey eFile & Serve™

WILLIAMS KASTNER GREENE & MARKLEY

By /s/S. Ward Greene
S. Ward Greene, OSB #774131
Attorneys for Plaintiff

WILLIAMS, KASTNER & GIBBS PLLC
PREBILL (prebill1.rtf)

Billing Lawyer: GREENE, WARD
Attorney Code: 1719
Session: 31364 Prebill #: 667906

Fee Detail through March 31, 2020
Disbursement Detail through March 31, 2020
Prepared on April 14, 2020 at 22:06:19 By: Tester, Melinda L.

CLIENT: 33281 ZWEIZIG, MAX
MATTER: 0102 Fraudulent Transfer
Court No. 19CV01547

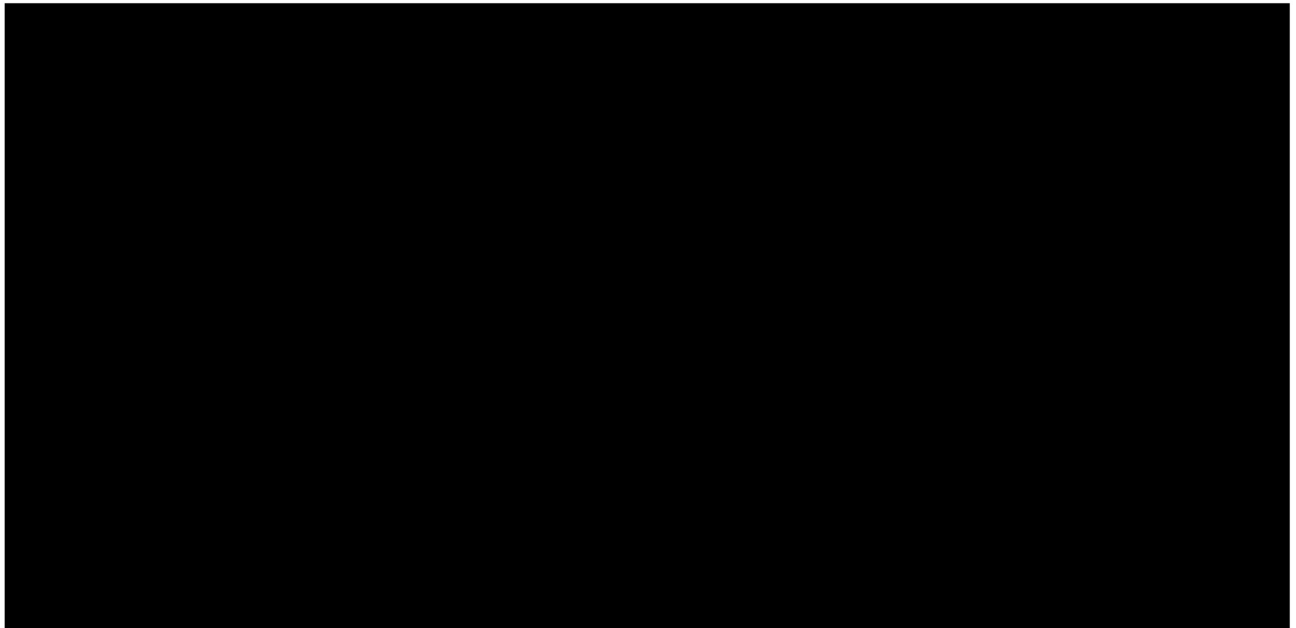
PAYOR: 33281 ZWEIZIG, MAX
BILLING ADDRESS: Max Zweizig

Bill Group: MAIN
Bill Date: April 2, 2020

E-mail Invoices: [REDACTED]

Billing Frequency: M
Monthly

Bill Format: MASTER1
Master Bill Format 1



MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Taryn Basauri	03/15/19	0.2	50.00	Review and analyze proposed responsive pleading from Rotes and forward same to client and Joel Christensen to inquire whether I am authorized to accept service on their behalf	4187664

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Taryn Basauri	03/18/19	0.2	50.00	Review email from client regarding Tim Rote's unauthorized practice of law and our collection efforts moving forward; respond to concerns regarding unauthorized practice of law and propose phone conference to discuss remaining matters.	4187666
Taryn Basauri	03/18/19	0.5	125.00	Review and analyze Oregon case law and statutes concerning vexatious litigation to evaluate potential cause of action to try and put a stop to continued filings	4187687
Taryn Basauri	03/26/19	1.2	300.00	Review and analyze Oregon anti-slapp statutes and corresponding case law to develop arguments in support of special statutory motion to strike Rote's counterclaims	4191973
Taryn Basauri	03/28/19	0.6	150.00	Review of Rote's amended answer, affirmative defenses, and counterclaims which now include me and this firm; evaluate civil rules to confirm requirement that he use formal service of process to inform decision to not respond on mine, the firm's, or Sandra's behalf	4192998
Taryn Basauri	03/29/19	0.4	100.00	Review of email from Rote advising he will file for sanctions and review of attached letter seeking sanctions to evaluate whether it warrants a response; review or court order advising of trial setting and confer with opposing counsel and Rote regarding their availability for trial	4194997
Taryn Basauri	04/07/19	1.2	300.00	Review of Oregon Case law governing defamation, intentional infliction of emotional distress, malicious prosecution, and intentional interference with contract counterclaims to develop legal authority in support of motions to dismiss the same	4197811

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Taryn Basauri	04/11/19	2.9	725.00	Evaluate statute of limitations of fraudulent transfer claim to determine whether we need to add to our response; review of correspondence from client and brief review of order he requested I review; respond to client's concerns to explain statute of limitations issue; identify key facts for statement of fact in motion for show cause order and draft the same	4200460
Taryn Basauri	04/25/19	4.1	1,025.00	Review of client emails regarding Sandy's concerns and respond to the same; draft email to client regarding the scope of representation and need for a separate engagement to represent Sandy in third party claims and to represent Max in separate lawsuit; review of alleged new evidence to determine whether Tim Rote identified anything material that we should know about in his second motion for summary judgment; draft response in opposition to second motion for summary judgment	4205379
Taryn Basauri	04/26/19	0.5	125.00	Evaluate Rote's argument regarding notice of fraudulent transfer and develop equitable argument to add to opposition to motion for summary judgment; phone conference with PLF to discuss Rote's third-party claims against me and the firm	4206296
Taryn Basauri	04/29/19	3.9	975.00	Correspond with Jim Callahan regarding Rote's claims against me and the firm; correspond with Adam Rosenberg about the same; correspond with client to confirm authorization to file his declaration in support of brief in opposition of motion for summary judgment today; review of recent Oregon Court of Appeals case denying Anti-SLAPP for statements made in writs of garnishment to confirm whether it affects our analysis; draft special motion to strike the counterclaims filed by Tim Rote against Max	4206750

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Taryn Basauri	04/30/19	2.8	700.00	Communicate with opposing counsel and self-represented parties to request rescheduling the hearing on defendants' motion for summary judgment; confer at length with Timothy Rote to document my attempt to agree in preparation of filing a motion to set over the hearing; revise and finalize anti-slapp motion and evaluate proper caption form in light of Rote's multiple improper captions; communicate with clients regarding our collection attempts, current claims against Max and Sandy, and status of outstanding motions and filings by Rote	4207922
Taryn Basauri	05/08/19	2.2	550.00	Review of case law concerning lis pendens and slander of title to develop case authority in support of motion to strike Tanya's counterclaims; draft motion to strike and declaration in support thereof; review of court correspondence advising motion for summary judgment will go back to Judge Van Dyk	4211925
Taryn Basauri	05/13/19	0.5	125.00	Receive and review Tim Rote's response in opposition to Anti-SLAPP motion to identify whether it warrants a reply brief and if so, whether it raises any issues requiring research	4213275
Taryn Basauri	05/14/19	0.4	100.00	Telephone conference with Jim Callahan to discuss the Siedel case and potential counterarguments to anticipate; discuss strategy with respect to an anti-slapp motion for claims against me and Williams Kastner; discuss upcoming hearings and Michael Montag's perceived role in this litigation	4214471

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Taryn Basauri	05/17/19	3.2	800.00	Review of Rote's correspondence to the Court advising he filed a motion to consolidate the Anti-SLAPP motions and for a hearing; review of filings; correspond with Michael Montag to request that he instruct Mr. Rote to email us copies of everything as we just learned he filed a civil rights complaint in the united states district of Columbia; review of case law to identify authority in support of argument against defamation and intentional infliction of emotional distress claims; draft reply brief in support of Anti-SLAPP motion to strike Tim Rote's counterclaims.	4215334
Taryn Basauri	05/20/19	0.6	150.00	Review of disciplinary action by Rote to evaluate whether we need to respond; review of amended motion request a hearing on the anti-slapp motion; review and approve final reply in support of anti-slapp for filing; evaluate Vukonovich case with Charley to discuss potential legal issues Ward can anticipate at the summary judgment hearing	4215991
Taryn Basauri	05/28/19	2.3	575.00	Review of Tanya Rote's opposition to motion to strike to identify any issues to address when drafting reply brief in support of motion to strike; draft motion to strike; receive and review court notice scheduling hearing on anti-slapp motion; provide update to client regarding the same	4219723
Taryn Basauri	06/03/19	0.3	75.00	Correspond with client and his counsel from underlying case regarding status of case and key facts for Ward to address at the motion for summary judgment hearing; correspond with Ward about the hearing and pending claims against me and the firm	4221621
Taryn Basauri	06/03/19	0.3	75.00	Correspond with client to provide update after hearing and to advise of upcoming hearings and their significance	4224834
Taryn Basauri	06/10/19	0.3	75.00	Review and analyze co-defendant anti-slapp motion to determine whether there's any good, different argument we can incorporate into our oral argument; review email from Tim Rote to Joel Christiansen's lawyer regarding anti-slapp	4226670

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Taryn Basauri	06/11/19	0.8	200.00	Correspond with client's fiancé regarding separate lawsuit Rote filed; review of docket to confirm activity and review of Rule 7 to confirm compliance therewith to evaluate and make recommendation for response; correspond with Sandra Ware regarding Court's action as to Tim's motions	4226692
Taryn Basauri	06/14/19	0.2	50.00	Review of court notice scheduling all Anti-SLAPP motions for 7/22 hearing and review of correspondence from Rote to determine whether action is necessary	4228210
Taryn Basauri	06/18/19	0.4	100.00	Confer with Jim Callahan regarding Tim Rote's recent attempts to seek a default judgment against Sandra Ware and Max Zweizig in separate case; discuss upcoming hearing on Anti-SLAPP motions and pending motion to disqualify judges; review of court letter requesting a proposed order granting our motion for alternate service	4228239
Taryn Basauri	06/25/19	0.3	75.00	Review recent Rote filings to ensure none require a response	4233793
Taryn Basauri	07/10/19	0.3	75.00	Correspond with client to provide update and evaluation regarding equity in property; correspond with Jim Callahan regarding the contempt motion and what I need to provide him with for his response on my behalf and the firm's	4239283
Taryn Basauri	07/11/19	1.4	350.00	Review of motion for contempt order and declaration in support to identify facts that would potentially support our motion and draft the same pursuant to Jim Callahan's request; gather exhibits thereto	4239372
Taryn Basauri	07/15/19	0.4	100.00	Review of docket to confirm no outstanding motions need to be responded to and discuss the same with Joel Christiansen so we can determine whether to share any work as we prepare for the Monday hearings on the Anti-SLAPP motions	4239392

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Taryn Basauri	07/22/19	3.4	850.00	Prepare, travel to, and appear for hearing on Rote's counterclaims, our anti-slapp motion, and Rote's motion for contempt; hearing was setover; report the same to client	4241915
Taryn Basauri	07/23/19	0.1	25.00	Correspond with client regarding absence of vexatious litigant statute in Oregon	4243516
Taryn Basauri	08/05/19	6.2	1,550.00	Prepare and appear for hearing on anti-slapp motion and Rote's motion for a contempt order against Ward and me; draft motion to appear by telephone and confer with Rote regarding appearance; draft proposed order and declaration in support thereof for filing	4249314
Taryn Basauri	08/07/19	1.1	275.00	Review of file with Ward to brief him on major issues and evaluate next steps in litigation and pending motions requiring a response or appearance	4250702
██████████	12/27/19	0.2	48.00	Telephone conference with Judge's judicial assistant discussing court protocol for 1-20 hearing.	4309362
██████████	12/27/19	0.6	144.00	Analysis of local court rules, UTCRs, SLRs, and Multnomah County Judge's Consensus Statement for purposes of determining ability to attend 1-20-19 hearing telephonically. (65+ pages).	4309364
██████████	12/30/19	0.5	120.00	Analysis of local rules in preparation for drafting motion declaration and order in support of request for telephonic appearance.	4309958
██████████	12/31/19	0.7	168.00	Draft motion, declaration, and order in support of telephonic appearance at January court hearing in case no. 19CV01547.	4311727
██████████	01/03/20	0.4	96.00	Final review of draft motion for telephonic appearance of plaintiff's complaint for purposes of ensuring compliance with local Uniform Trial Court Rules, Oregon Rules of Civil Procedure and Clackamas County supplemental local rules. Perform final analysis prior to finalizing same.	4312183

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
██████████	01/03/20	0.3	72.00	Confirm lack of communication from Rote in any form (mail, email, fax, voice message) to any person within WK office for purposes of updating certification that no response has been received at time of filing in conformance with Clack Co SLR 6.044.	4312289
Ward Greene	01/08/20	0.4	220.00	Receive and review opposition to motion to withdraw privileged document.	4313960
██████████	01/10/20	2.6	624.00	Analysis of current status of legal proceedings and filing in cases 19-CV-01547, 19-CV-14552, 19-CV-00824, 3:15-CV-02401, 1:19-CV-1299, 3:14-cv-0406, 3:19-cv-00082, 3:19-cv-01988 for use in ongoing factual and legal theory development, with specific attention to analyzing various legal issues and legal arguments since September 2019 (motion to strike, motion to withdraw ex 3, motion to withdraw Rote's previous withdrawal, contempt rulings, pre-filing restraint rulings, recusal issues, etc.) for purposes of preparing for January 21,2020 status hearing in fraudulent transfer cases broadly addressing various issues of various cases.	4314553
Ward Greene	01/16/20	1.0	550.00	Office conference with legal assistant regarding hearing; office conference with associate regarding issues for hearing; review list of disputed items; review and revise first request for production of documents; review email to client	4316862
██████████	01/16/20	1.0	240.00	Analysis of Zweizig's motion for summary judgment in the fraudulent transfer case for use in factual and legal theory development of case, with specific attention to identifying factual assertion to test the veracity, scope, and extent of in Tanya Rote's deposition.	4316915
Ward Greene	01/20/20	1.6	880.00	Office conference with associate regarding status of pending issues; review pleadings and list of issues; prepare for hearing; review emails to and from client regarding request for production of documents.	4317532

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
██████████	01/20/20	2.2	528.00	Analysis of all pleadings, motions, and any other filings in fraudulent transfer matter for purposes of developing detailed understanding of factual background of key issues in case in preparation for focusing on key issues and providing relevant information to the court in 1-21 hearing regarding numerous motions. (200 + pages)	4317802
██████████	01/20/20	2.3	552.00	Continued analysis of all pleadings, motions, and any other filings in fraudulent transfer matter for purposes of legal theory development and developing detailed understanding of factual background of key issues in case in preparation for focusing on key issues and providing relevant information to the court in 1-21 hearing regarding numerous motions. (300 + pages)	4317804
██████████	01/20/20	2.1	504.00	Analysis of all pending motions before the court per itemized agenda in attorney Caldwell's letter to Judge Steele for purposes of formulating position on all pending motions in order to assert arguments and commentary on behalf of Zweizig in fraudulent transfer action on 1-21-20 hearing.	4317807
██████████	01/21/20	0.6	144.00	Prepare for motion regarding to stay discovery, anti-slapp hearing, and protective order by reviewing arguments in favor and against each topic, with specific attention to emphasizing why arguments in favor of Zweizig's position are meritorious.	4317563
██████████	01/21/20	3.0	720.00	Attend court hearing telephonically concerning variety of pending motions in Zweizig v. Rote fraudulent transfer case. Attend hearing for use in ongoing legal theory and factual development of case.	4317780
██████████	01/21/20	1.1	264.00	Analysis of Judge Lininger's judicial commentary and legal analysis on the record during court recesses for possible use in raising additional arguments upon resumption of court proceedings.	4317781

MATTER TIME DETAIL

<u>Atty</u>	<u>Date</u>	<u>Hours</u>	<u>To Bill Amount</u>	<u>Description of Services Rendered</u>	<u>Time ID</u>
Ward Greene	01/21/20	4.0	2,200.00	Review documents and prepare for hearing; attend hearing with Judge Lininger regarding motions to strike and for award of attorney fees; office conference with Cassie Bow regarding discovery; email to client regarding successful hearing.	4318015
██████████	01/28/20	0.4	96.00	Analysis of Rote's motion for reconsideration for purposes of determining necessity and possible benefits of responding to same.	4323989
Fees Total:		68.2	18,970.00		
			0		

TIME SUMMARY BY TIMEKEEPER

<u>Timekeeper</u>	<u>Hrs.</u>	<u>Rate</u>	<u>To Bill Amount</u>
1719 Ward Greene	7.0	550.00	3,850.00
----- SENIOR COUNSEL	7.0	550.00	3,850.00
1770 Taryn Basauri	43.2	250.00	10,800.00
1811 ██████████	18.0	240.00	4,320.00
----- ASSOCIATE	61.2	247.06	15,120.00
TOTAL ALL TIMEKEEPERS		68.2	18,970.00

MATTER DISBURSEMENT DETAIL

<u>Atty</u>	<u>Date</u>	<u>Session</u>	<u>Disb Amt</u>	<u>Description of Disbursement</u>	<u>Disb ID</u>
Disb Total			0.00		

MATTER DISBURSEMENT SUMMARY

<u>Code</u>	<u>Description</u>	<u>Amount</u>
Total Disbursements		0.00