



S T A M P E R R U B E N S, P. S.
ATTORNEYS AT LAW

KYLE NOLTE
knolte@stamperlaw.com

November 16, 2025

VIA E-MAIL ONLY

Ms. Morgan Ashley
Anchor/Executive Producer
KHQ
1201 W. Sprague Ave.
Spokane, WA 99201
morgan.ashley@nonstoplocal.com

Re: Mr. Stephen Ford

Dear Ms. Ashley:

Greetings.

Our firm represents Mr. Stephen Ford with regard to Spokane County Superior Court cause no. 24-2-06116-32. I am responding to your e-mail to Mr. Ford of November 13, 2025.

As a general rule, we do not try our cases in the media as it undermines the integrity of the adjudicative process. Accordingly, neither Mr. Ford nor our firm has any official comment.

Instead, I can refer you to the Court case file, wherein you will find:

- Answers filed by each of the Defendants wherein they deny the Plaintiffs' claims.
- Declarations filed by the Plaintiffs wherein they acknowledge receiving several hundred thousand dollars from the Defendant lenders, which they failed to repay.
- A July 30, 2025, order issued by Judge Annette Plese, imposing sanctions against the Plaintiffs and awarding the Defendants more than \$23,000 in fees. (As a courtesy, please see attached/enclosed a copy of Judge Plese's July 30, order).

Ms. Morgan Ashley
Re: Mr. Stephen Ford
November 16, 2025
Page 2

- A September 26, 2025, order issued by Judge Plese awarding Mr. Ford \$8,145.00 in attorney's fees. (Again, as a courtesy, please see attached/enclosed a copy of Judge Plese's September 26, order). Judge Plese issued similar orders in favor of other Defendants.
- Last month Judge Plese heard the Defendants' motion to dismiss the Plaintiffs' claims, and her written decision is pending.
- Mr. Ford is not being investigated by the Washington State Department of Financial Institutions.

I can only presume the Plaintiffs are now attempting to try their case in the media for the purpose of influencing Judge Plese's decision with regard to the Defendants' motion to dismiss the Plaintiffs' claims. Mr. Ford will not take part in this.

Finally, in fairness to all concerned you may consider withholding your story, if any, until after Judge Plese has issued her decision on the Defendants' motion to dismiss the Plaintiffs' claims.

Sincerely,



KYLE W. NOLTE

Enclosures:

cc: File
Mr. Stephen Ford

H:\Clients\Ford.Stephen\Correspondence\Ltr. Ashley 11.16.25.docx

Per CR5(e) & Judge Please this document
Has been filed with Clerk on:

JUL 30 2025

FILED

JUL 30 2025

Timothy W. Fitzgerald
SPOKANE COUNTY CLERK

CN: 2420611632

SN: 64

PC: 8



SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

JEREMY ALVIS, STEVEN BRIMMER, and
CYNTHIA O'BRIEN,

Plaintiffs,

v.

BASCK, LLC; DIAMOND ROCK
PROPERTIES LLC; UNITED
PROCESSING SERVICES, INC.; PACIFIC
MORTGAGE CENTER, LLC; ALAN HURD
and JANE DOE HURD, spouse; HOME
CENTER DESIGN & CONSTRUCTION,
LLC; RICK HURD and NANCY HURD,
spouse; STEPHEN FORD; FORD &
MORTENSEN, PS aka FORD, DALTON
& MORTENSEN PS; TCF PROPERTIES,
LLC; DIAMOND ROCK FINANCIAL, LLC;
ROBERT "BOB" CALHOUN and JANE
DOE CALHOUN, spouse; and STEVEN
SCHNEIDER.

Defendants.

~~[PROPOSED]~~

NO. 24-2-06116-32

ORDER ON PLAINTIFFS' AMENDED
MOTION FOR PROTECTIVE ORDER.
SANCTIONS, AND WITNESS
TAMPERING

CLERK'S ACTION REQUIRED

I. BASIS

THIS MATTER came before the above-entitled Court on the motion of Plaintiffs, by and

ORDER ON PLAINTIFFS' AMENDED MOTION FOR PROTECTIVE
ORDER, SANCTIONS & WITNESS TAMPERING: 1



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1 through their attorney John Pierce, of Law Office of John Pierce, P.S., requesting the Court 1)
2 enter a no-contact order against the defendants, 2) impose sanctions upon Defendants Alan Hurd,
3 Stephen Ford and TCF Properties, LLC, for witness tampering, and 3) refer Defendants Alan Hurd,
4 Stephen Ford and TCF Properties, LLC for criminal investigation and prosecution under
5 9A.72.120.
6

7
8 Plaintiffs were represented at the hearing by their attorney John Pierce.
9

10 Defendant Alan Hurd was represented at hearing by Kevin W. Roberts of Robert
11 Freebourn, PLLC.
12

13 Defendant Stephen Ford was represented at hearing by Kyle W. Nolte of Stamper Rubens,
14 P.S.
15

16 Defendant TCF Properties, LLC, was represented at hearing by Darren M. Digiacinto of
17 Winston & Cashatt, P.S.
18

19 Defendant Basck, LLC and Diamond Rock Properties, LLC, were represented at hearing
20 by Zaine M. Yzaguirre of Lukins & Annis, P.S.
21

22 The Court considered the Court case file and the following pleadings and materials
23 submitted in support of, or in opposition to the motion:
24

- 25 1. Plaintiffs' Amended Motion for Protective Order and to Sanction Defendants for
26 Witness Tampering in Violation of RCW 9A.72.120;
27
28 2. Declaration of Defendant Alan Hurd;
29
30 3. Defendant Alan Hurd's Response Memorandum;
31
4. Plaintiff's Reply to Reply by Defendant Alan Hurd Response;

ORDER ON PLAINTIFFS' AMENDED MOTION FOR PROTECTIVE
ORDER, SANCTIONS & WITNESS TAMPERING: 2



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1 5. Declaration of Trina Ford;
2 6. Declaration of Darren Digiacinto;
3 7. Defendant TCF Properties, LLC's Response Memorandum;
4 8. Plaintiffs' Reply to Response by TCF Properties, LLC's Response;
5 9. Declaration of Stephen Ford;
6 10. Declaration of Kyle W. Nolte;
7 11. Defendant Stephen Ford's Response Memorandum;
8 12. Declaration of John Pierce Plaintiffs' Reply to Response Stephen Ford Response;
9 13. Supplemental Declaration of Stephen Ford;
10 14. Defendants' Basck, LLC's and Diamond Rock Financial, LLC's Response
11 Memorandum;
12

13 15. The Court received argument from Plaintiffs' counsel and from each of Defendants'
14 counsel present.
15

16 16. At the commencement of the hearing, Kevin Roberts, attorney for Mr. Alan Hurd,
17 moved the Court to strike the motion for a protective order as not properly before the Court.
18

19 17. At the commencement of the hearing, Kyle W. Nolte, attorney for Mr. Stephen
20 Ford, moved the Court to excuse Mr. Juan Robles from counsel table and the Courtroom.
21

22 II. FINDINGS

23 1. Plaintiffs' motion for a protective order was not properly before the Court, which
24 Plaintiffs' counsel conceded at the beginning of his argument, and which motion the Court struck
25 at hearing.
26
27



1 2. Mr. Juan Robles is not a current party to the matter, but pursuant to Plaintiffs'
2 counsel, a material witness. The Court excluded Mr. Robles from the courtroom for hearing.

3 3. Plaintiffs' written motion requested the Court "award sanctions against Defendants
4 Alan Hurd, Stephen Ford, and TCF Properties, LLC for tampering with witnesses, in violation of
5 RCW 9A.72.120, and requested the Court refer this matter [the alleged conduct of Defendants
6 Alan Hurd, Stephen Ford, and TCF Properties, LLC], for criminal investigation and prosecution
7 under the same statute."
8

9 4. At hearing, Plaintiffs' counsel stated he was not asking the Court to refer
10 Defendants Alan Hurd, Stephen Ford, and TCF Properties, LLC.
11

12 5. Witness tampering under 9A.72.120, is a criminal matter and there is no private
13 cause of action available to the Plaintiffs that the Court could order or enforce.
14

15 6. Plaintiffs failed to provide any admissible evidence to the Court in support of their
16 several motions.
17

18 7. Plaintiffs provided the Court no affidavit or declaration of any person with personal
19 knowledge of any fact alleged in, or relevant to Plaintiffs' motion.
20

21 8. Plaintiffs submitted to the Court excerpts of text messages as evidence of
22 communications, which Plaintiffs² alleged as the basis for their motion; however, Plaintiffs
23 submitted no affidavit or declaration authenticating the text messages, and the text messages do
24 not indicate a date or a time they were allegedly sent or delivered.
25

26 9. The multiple declarations submitted to the Court by Plaintiffs' counsel are not
27 evidence. Pursuant to Plaintiffs' counsel's declarations, he possessed no personal knowledge of
28
29
30
31



1 the facts alleged in Plaintiffs' motion, including the text messages, which Plaintiffs' allege as the
2 basis for their motion.

3
4 10. Plaintiff's counsel is not permitted to be a witness in the matter and Plaintiffs'
5 counsel's declarations cannot be used to authenticate, corroborate or establish any fact alleged in
6 Plaintiffs' motion, for which Plaintiffs' counsel has no personal knowledge.
7

8 11. The Declaration of Mr. Alan Hurd, is the only admissible evidence before the Court
9 with regard to the context of the communications Plaintiffs submitted to the Court and which
10 Plaintiffs claim as the basis of their motion.
11

12 12. Based on the testimony of Mr. Alan Hurd, which is the only admissible evidence
13 before the Court, the Court finds that Mr. Juan Robles initiated the contact with Mr. Hurd.
14

15 13. The Court finds no basis to impose sanctions against Defendant Alan Hurd, a non-
16 lawyer, based on his response to Mr. Robles.
17

18 14. Based on the evidence before the Court, there is no basis to impose sanctions
19 against Defendant Stephen Ford.
20

21 15. Plaintiffs' counsel conceded at hearing that Defendant TCF Properties, LLC, had
22 never received his June 9, 2025, e-mail advising that Mr. Robles was "an anticipated new
23 plaintiff." Nonetheless, Plaintiffs included TCF Properties, LLC, in their motion.
24

25 16. Based on the evidence before the Court, there is no basis to impose sanctions
26 against Defendant TCF Properties, LLC.
27

28 17. Each of the Defendants named in Plaintiffs' motion and appearing at hearing filed
29 a response to Plaintiffs' motion, and each requested the imposition of sanctions against Plaintiffs,
30
31



1 and an award of fees for having to respond to and defend Plaintiffs' motion.

2 18. Having considered Plaintiffs' motion and the Defendants' response materials, and
3 based on the serious nature of Plaintiffs' allegations against the Defendants named in Plaintiffs'
4 motion, including allegations that Defendants conspired to engage in criminal conduct, without
5 having provided any admissible evidence of such conduct to the Court, this Court agrees the
6 imposition of sanctions in the form of attorney fees is appropriate and warranted.
7

8 19. Plaintiffs' will pay the Defendants' attorneys fees incurred in responding to this
9 motion, as determined by a fee affidavit submitted by their respective counsel.
10

11 Based on the findings of the Court,
12

13 III. ORDER

14 IT IS HEREBY ORDERED:
15

16 1. Plaintiffs' motion for protective order is DENIED.
17

18 2. Plaintiffs' motion for sanctions against Defendants Alan Hurd, Stephen Ford and
19 TCF Properties, LLC, is DENIED.
20

21 3. Plaintiffs' motion requesting the Court refer Defendants Alan Hurd, Stephen Ford
22 and TCF Properties, LLC, for criminal investigation and prosecution under 9A.72.120 is DENIED.
23

24 4. Defendants Alan Hurd's, Stephen Ford's and TCF Properties, LLC's request for
25 the imposition of sanctions against Plaintiffs is GRANTED.
26

27 5. Defendants Alan Hurd, Stephen Ford and TCF Properties, LLC, are awarded their
28 fees incurred in responding to and defending against Plaintiffs' motion.
29

30 6. The Court shall determine a fee award to Defendants Alan Hurd, Stephen Ford and
31

Reasonable 

ORDER ON PLAINTIFFS' AMENDED MOTION FOR PROTECTIVE
ORDER, SANCTIONS & WITNESS TAMPERING: 6


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1 TCF Properties, LLC, without oral argument, as follows:

2 a. Within ten days of entry of this order, counsel for Defendants Alan Hurd,
3 Stephen Ford and TCF Properties, LLC, shall file their fee affidavits and a proposed order
4 with the Court, and serve a copy upon Plaintiffs' counsel.
5

6 b. Within five (5) days of receipt of Defendants' fee affidavits, Plaintiffs'
7 counsel shall file their written objection to Defendants' request for fees, if any, and serve
8 a copy on Defendants' counsel.
9

10 c. Within five (5) days of receipt of Plaintiffs' written objection, if any,
11 Defendants' counsel shall have five (5) days to submit any reply to Plaintiffs' objection.
12

13 d. Thereafter, the Court shall determine an award of fees to Defendants Alan
14 Hurd, Stephen Ford and TCF Properties, without oral argument.
15

16 7. The fees awarded herein shall be paid by the Plaintiffs to Defendants within 30
17 days. *unless specified differently in the order. (Asp)*
18

19 8. In the event the fees awarded herein, or any portion thereof, shall remain unpaid
20 after 30 days, the Defendants, or any of them, shall be entitled to entry of a judgment against
21 Plaintiffs, jointly and severally, without further notice to Plaintiffs, upon submission of affidavit
22 from said Defendant evidencing the amount then remaining unpaid. Such judgment shall accrue
23 interest at the legal rate of 12% per annum, until satisfied.
24
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ORDER ON PLAINTIFFS' AMENDED MOTION FOR PROTECTIVE
ORDER, SANCTIONS & WITNESS TAMPERING: 7



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DONE IN OPEN COURT THIS 30 day of July, 2025.

HON. ANNETTE PLESE, JUDGE

Presented by:

STAMPER RUBENS, P.S.

By: Kyle W. Nolte
Kyle W. Nolte, WSBA #27073
Attorney for Defendant Stephen Ford, Ford &
Mortensen, PS aka Ford, Dalton, &
Mortensen, PS

LUKINS & ANNIS, P.C.

Electronically Approved 7.23.25
By: Michael D. Franklin
Michael D. Franklin, WSBA #34213
Attorney for Defendants Basok LLC and
Diamond Rock Financial LLC

WINSTON & CASHATT, P.S.

Electronically Approved 7.23.25
By: Darren M. Digiacinto
Darren M. Digiacinto, WSBA #39771
Attorney for Defendants TCF Properties LLC

Approved by:
Notice of Presentment waived:

ROBERTS FREEBOURN, PLLC

Electronically Approved 7.23.25
By: Kevin Roberts
Kevin Roberts, WSBA #29473
Attorney for Defendants Pacific Mortgage
Center LLC; Alan Hurd; Jane Doe Hurd;
Home Center Design & Construction LLC;
Rick Hurd; Nancy Hurd; Robert Calhoun; and
Jane Doe Calhoun

LAW OFFICE OF JOHN PIERCE, P.S.

Agreed as to Form.
By: John Pierce
John Pierce, WSBA #38722
Attorney for Plaintiffs Jeremy Alvis, Steven
Brimmer, and Cynthia Obrien

H:\Clients\Ford, Stephen\Pleadings\Order on Motion for PO Sanctions Witness Tampering 7.23.25 (v2).docx

ORDER ON PLAINTIFFS' AMENDED MOTION FOR PROTECTIVE
ORDER, SANCTIONS & WITNESS TAMPERING: 8


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CN: 2420611632

SN: 114

PC: 6



FILED

SEP 26 2025

TIMOTHY W. FITZGERALD
SPOKANE COUNTY CLERK

SUPERIOR COURT, STATE OF WASHINGTON, COUNTY OF SPOKANE

JEREMY ALVIS, STEVEN BRIMMER, and
CYNTHIA O'BRIEN,

Plaintiffs,

v.

BASCK, LLC; DIAMOND ROCK
PROPERTIES LLC; UNITED
PROCESSING SERVICES, INC.; PACIFIC
MORTGAGE CENTER, LLC; ALAN HURD
and JANE DOE HURD, spouse; HOME
CENTER DESIGN & CONSTRUCTION,
LLC; RICK HURD and NANCY HURD,
spouse; STEPHEN FORD; FORD &
MORTENSEN, PS aka FORD, DALTON
&MORTENSEN PS; TCF PROPERTIES,
LLC; DIAMOND ROCK FINANCIAL, LLC;
ROBERT "BOB" CALHOUN and JANE
DOE CALHOUN, spouse; and STEVEN
SCHNEIDER.

Defendants.

~~[PROPOSED]~~

NO. 24-2-06116-32

ORDER AWARDING FEES TO
DEFENDANT STEPHEN FORD

(PURSUANT TO ORDER OF THE
COURT ENTERED JULY 30, 2025)

* ORIGINAL *

CLERK'S ACTION REQUIRED

I. BASIS

THIS MATTER came before the above-entitled Court pursuant to an Order of the Court

ORDER AWARDING FEES TO DEFENDANT STEPHEN FORD: 1



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1 entered July 30, 2025, and the Affidavit of Kyle W. Nolte separately filed. Following a hearing on
2 July 18, 2025, the Court denied Plaintiffs' motion requesting a protective order, sanctions, and
3 referral by the Court of Defendants Alan Hurd, Stephen Ford and TCF Properties, LLC, for
4 criminal investigation and prosecution under 9A.72.120. On July 30, 2025, the Court entered an
5 order authorizing an award of fees to Alan Hurd, Stephen Ford and TCF Properties, LLC, upon
6 submission of an appropriate affidavit. The Court has reviewed the Affidavit of Kyle W. Nolte
7 regarding the fees incurred by Defendant Stephen Ford in responding to Plaintiffs' motion.
8
9

10 II. FINDINGS

11
12
13 1. The Court finds the attorney's fees requested by Defendant Stephen Ford in the
14 amount of \$10,005.00, as evidenced by the Affidavit of Kyle W. Nolte, were incurred by
15 Defendant Stephen Ford only in responding to the Plaintiffs' motion.
16

17
18 2. The Court finds the attorney's fees requested by Defendant Stephen Ford, as
19 evidenced by the Affidavit of Kyle W. Nolte, in the amount of \$10,005.00, are reasonable.
20

21 Based on the findings of the Court,

22 III. ORDER

23 IT IS HEREBY ORDERED:

24
25 1. Defendant Stephen Ford is awarded the total sum of ~~\$10,005.00~~ ^{\$8145⁰⁰} ^(P30) representing fees
26 incurred by him in responding to Plaintiffs' motion.
27

28 2. No costs are awarded to Defendant Stephen Ford herein.
29

30 3. The fees awarded to Stephen Ford herein shall be paid by the Plaintiffs to Defendant
31 Stephen Ford within ~~thirty (30)~~ ^{Sixty (60)} days of entry of this Order.



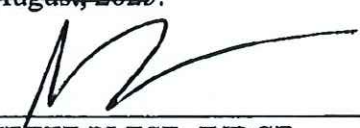
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ORDER AWARDING FEES TO DEFENDANT STEPHEN FORD: 2

1 4. In the event the fees awarded herein, or any portion thereof, shall remain unpaid
2 *after 60 days*
3 ~~after 30 days~~, Defendant Stephen Ford shall be entitled to entry of a judgment against Plaintiffs,
4 jointly and severally, without further notice to Plaintiffs, and such judgment shall accrue interest
5 at the legal rate of 12% per annum, from the date of entry, until satisfied.
6

7
8 DONE IN OPEN COURT THIS 26 day of ~~August~~ ^{Sept}, 2025.
9

10
11 
12 HON. ANNETTE PLESE, JUDGE

13 Presented by:

Approved by:

Notice of Presentment waived:

14
15
16 STAMPER RUBENS, P.S.

LAW OFFICE OF JOHN PIERCE, P.S.

17
18 
19 By: Kyle W. Nolte
20 Kyle W. Nolte, WSBA #27073
21 Attorney for Defendant Stephen Ford, Ford &
22 Mortensen, PS aka Ford, Dalton, &
23 Mortensen, PS
24

25
26 By: Objected too
27 John Pierce, WSBA #38722
28 Attorney for Plaintiffs Jeremy Alvis, Steven
29 Brimmer, and Cynthia Obrien
30
31

ORDER AWARDING FEES TO DEFENDANT STEPHEN FORD: 3


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Ct Renewed

Defendant Stephen Ford fees.

Date	Attorney	Work Performed	Hours	Fee
6/16/25	KWN	Review OC e-mail and attached P's Motion for Protective Order, Sanctions for Witness Tampering (RCW 9A.72.120), with Exs., forward to Client.	.30	\$112.50
6/16/25	KWN	TC with Client re: P's Motion for Protective Order, Sanctions for Witness Tampering (RCW 9A.72.120).	.40	\$150.00
6/16/25	KWN	E-mail to/from OC re: status of his representation of Lopez.	.10	\$37.50
6/27/25	CEC	Review OC email and attached P's Amended Motion for Protective Order, Sanctions for Witness Tampering (RCW 9A.72.120), with Exs., forward to Client.	.30	\$90.00
6/27/25	CEC	T/C with Client re: responding to P's Amended Motion for Protective Order, Sanctions for Witness Tampering (RCW 9A.72.120).	.30	\$90.00
6/27/25	KWN	T/C with Client re: responding to P's Amended Motion for Protective Order, Sanctions for Witness Tampering (RCW 9A.72.120).	.30	\$112.50
7/01/25	KWN	Strategy Conference with CEC	.60	\$225.00
	CEC	Strategy Conference with KWN	.60	\$180.00
7/01/25	CEC	Legal research re: application of RCW 9A.72.120.	.80	\$240.00
7/01/25	KWN	T/C with Client to review Lopez loan documents	.80	\$300.00
7/01/25	CEC	Legal research re: motion for Protective Order, Sanctions	1.70	\$510.00
7/01/25	CEC	Review file; draft Response Memorandum.	2.50	\$750.00
7/02/25	KWN	Review file; Draft Client Declaration; Draft KWN Declaration; Review and revise Response Memorandum.	4.10	\$1,537.50
7/02/25	KWN	Review TCF Response to P's Motion	.40	\$150.00
7/03/25	KWN	Review Plaintiff's Witness List, forward to Client.	.20	\$75.00



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AFFIDAVIT OF KYLE W. NOLTE RE: DEFENDANT STEPHEN FORD'S
FEES AND COSTS (PURSUANT TO ORDER ENTERED JULY 30, 2025):

Date	Attorney	Work Performed	Hours	Fee
7/03/25	KWN	T/C with Client.	.30	\$112.50
7/03/25	KWN	Review Diamond Rock/Basck Response to P's motion.	.30	\$112.50
7/03/25	KWN	Review PMC & Hurd Response to P's motion.	.40	\$150.00
7/03/25	KWN	Review Plaintiff's Reply to TCF Response in Opposition to P's motion.	.40	\$150.00
7/03/25	CEC	Strategy Conference with KWN.	.30	\$90.00
7/03/25	KWN	Strategy Conference with CEC	.30	\$112.50
7/03/25	KWN	Review file; Review and final Client Declaration; Review and final KWN Declaration; e-mail to Client; T/C with Client.	.60	\$225.00
7/03/25	CEC	Review TCF, PMC & Hurd Briefings; Review and final Client's Response Memorandum; Draft proposed Order.	1.80	\$540.00 240
7/11/25	KWN	Review OC Reply Declaration to Client Response materials, send to Client.	.60	\$225.00
7/11/25	KWN	T/C with Client.	.20	\$75.00
7/11/25	KWN	Strategy Conference with CEC.	.30	\$112.50
7/11/25	CEC	Strategy Conference with KWN	.30	\$90.00
7/11/25	KWN	Review file; Draft Client Supplemental Declaration, send to Client for review.	1.20	\$450.00
7/12/25	KWN	T/C with Client.	.30	\$112.50
7/17/25	KWN	Review File; Prepare Argument for hearing on P's motion.	1.10	\$412.50
7/18/25	KWN	To Superior Court; Hearing on P's motion for Protective Order, Sanctions for Witness Tampering (RCW 9A.72.120).	1.60	\$600.00
7/18/25	KWN	Prepare Proposed Order, send to Client for review.	1.50	\$562.50
7/18/25	KWN	TC with client re: Proposed Order.	.30	\$112.50
7/21/25	KWN	Review Client e-mail re: Proposed Order; T/C with Client	.20	\$75.00
7/21/25	KWN	Revise Proposed Order, send to D's counsel for review and input.	.40	\$150.00
7/21/25	KWN	Review DD proposed red-line changes to Proposed Order, revise Proposed Order.	.20	\$75.00



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AFFIDAVIT OF KYLE W. NOLTE RE: DEFENDANT STEPHEN FORD'S
FEES AND COSTS (PURSUANT TO ORDER ENTERED JULY 30, 2025):

Date	Attorney	Work Performed	Hours	Fee
7/23/25	KWN	TC with KR re: proposed revisions to Proposed Order, and approval.	.10	\$37.50
7/23/25	KWN	Review DD e-mail approving Proposed Order.	.10	\$37.50
7/23/25	KWN	Review ZY e-mail approving Proposed Order.	.10	\$37.50
7/23/25	KWN	E-mail to D's counsel with final Proposed Order.	.10	\$37.50
7/23/25	KWN	E-mail to OC counsel with Proposed Order on P's motion for Protective Order, Sanctions for Witness Tampering (RCW 9A.72.120).	.10	\$37.50
7/28/25	KWN	Review OC e-mail approval of Proposed Order, with signature page; print, sign and assemble signature pages for entry with Court.	.20	\$75.00
7/29/25	KWN	Review file; begin drafting KWN Affidavit Re: Client's Fees and Costs	.50	\$187.50
8/04/25	KWN	Review file; review, revise and final KWN Affidavit Re: Client's Fees and Costs.	.70	\$262.50
8/04/25	KWN	Prepare Proposed Order on award of fees to Client.	.50	\$187.50
		KWN Fees:	19.80	\$7,425.00
		CEC Fees:	8.60	\$2,580.00
		Total Fees:		\$10,005.00

9. Defendant Stephen Ford did not incur any costs in responding to the Plaintiffs' motion.

8145⁰⁰ *paid*

10. Defendant Stephen Ford incurred a total of \$10,005.00, consisting of \$10,005.00 in fees and \$0.00 in costs, responding to Plaintiffs' motion, which was the basis for the Court's award of fees and costs herein.

11. Defendant Stephen Ford's fees and costs requested herein were incurred only in responding to the Plaintiffs' motion, for which the Court awarded Defendant Stephen Ford fees and costs.

12. Defendant Stephen Ford's requested fees and costs are reasonable.



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AFFIDAVIT OF KYLE W. NOLTE RE: DEFENDANT STEPHEN FORD'S
FEES AND COSTS (PURSUANT TO ORDER ENTERED JULY 30, 2025);

R
9/26/2025