Findings of Fact Regarding Attorney Fee Requests, Robert Wilson-Hoss:

Fourteen Different Judicial Officers,

Including Approval of Fees on Appeal

The skills required to perform the services were significant. Counsel’s expertise in litigated matters is substantial. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. This matter involved unique and challenging aspects of matters including controlling contract provisions and the need for a creative and fair resolution of the process going forward.

18-2-00394-23

This matter required an understanding and management of several highly technical areas of the law, including especially as they apply to homeowners’ association litigation, and litigation in general. These include priority issues, state liens, federal liens, management of lender liens and the interrelationship of these as they affected possible approaches; addressing and managing multiple complicated aspects of Sheriff’s sale processes as they arose in this matter; management of acute and severe neighborhood dispute issues through multiple events and to a successful conclusion; and complex negotiations under difficult circumstances, again, leading to a successful conclusion. The results were highly favorable to Counsel’s association client. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of at least $350 per hour would be justified.

13-2-00556-9

The skills required to perform the services were significant. Counsel’s expertise in homeowners' association matters is substantial. Counsel took steps to conclude the lawsuit efficiently and effectively, and favorably to his association client. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified.

15-2-01244-1

Counsel's preparation and presentation skills in litigation are excellent, and his reputation as an excellent practitioner is earned, and concurred with by this Court.

Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified. The amount involved in this matter to this client was significant, and included its need to support its culture of payment of its assessments, and to address critical property condition violations. The results obtained were excellent.

18-2-0356-23

Counsel's work on this matter has successfully addressed many issues, both recurring and novel, and the result for Plaintiff is excellent. His reputation and ability, including preparation and presentation, are excellent, in matters involving litigation of real property, probate and other matters. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified.

18-2-00134-23

The skills required to perform the services were significant. Counsel’s expertise in litigated matters is substantial. In particular, this matter involved property condition issues that were severe, and of significant importance to the association and the neighborhood. Counsel has significant experience addressing such matters first, to offer all reasonable opportunities to the member to cooperate to resolve the issues; but when the member chooses not to cooperate, to litigate to a successful conclusion, which results in the protection of the association and the neighborhood from the issues. He understands and applies the various statutory, common law, and governing document supports for such litigation, and his strategies in prosecuting these matters are effective and efficient. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified.

17-2-00212-1

The skills required to perform the services were significant. Counsel’s expertise in litigated matters is substantial. This matter required an understanding of a wide variety of substantive issues, many of which were novel, that helped to conclude the lawsuit efficiently and effectively, and favorably to his association client. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified.

17-2-05739-34

The amount of time required to perform legal services herein on behalf of [the client], as set forth in the Declaration of Counsel and supporting documents filed herein, is reasonable, and based on contemporary records. The Court has exercised its independent judgment about the reasonableness of these fees based on the records of this matter. Counsel's litigation skills are significant, and his expertise is substantial. His reputation and ability, including preparation and presentation, are excellent. He prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery. His fee in this matter to this client is charged at the rate of $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified.

There is no substantial likelihood that acceptance of this matter precluded counsel from other employment. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified. The amount involved in this matter to this client was very significant, and included its need to support its culture of payment of its assessments. The results obtained were excellent.

16-2-00692-6

"Reading one of your briefs is like a cool glass of water on a hot day."

18-5-00011-23

"Thank you. That was a pleasure."

15-2-01244-1

“That was amazing” (Court’s oral response to submissions).

16-4-00161-1

"Well, I have read your pleadings, and Mr. Wilson-Hoss, I will say I appreciate your pleadings, ...and you have in my view always had very complete pleadings ... and I want to tell you I appreciate that. ...I have always been impressed with your completeness."

13-2-02369-2

The amount of time required to perform legal services herein on behalf of [Plaintiff], as set forth in the Declaration of Counsel and supporting documents filed herein, is reasonable, and based on contemporary records. The issues dealt with were many, and required substantial research, investigation and experience to resolve. The Court has exercised its independent judgment about the reasonableness of these fees based on the records of this matter. The skills required to perform the services were significant. Counsel’s expertise in litigated matters is substantial. Counsel's reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified.

16-2-00701-9

The skills required to perform the services were significant. Counsel’s expertise in homeowners' association matters is substantial. Counsel took steps to conclude the lawsuit efficiently and effectively, and favorably to his association client. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery. Counsel’s fee in this matter to this client is $250 per hour. This is below the range of fees customarily charged in this locality for similar services. A fee of $350 per hour would be justified.

15-2-00466-6

The skills required to perform the services were significant. ...In particular, in this matter, counsel was required to attempt to collect this account for about seven years. The primary Defendants filed for bankruptcy protection, which required advocacy on behalf of Plaintiff in the bankruptcy proceedings. The primary Defendants made several promises to pay, and settlement agreements were reached and breached. The title issues were very difficult to address. Service on the national banks was difficult to achieve and took substantial investigation and research. After default, counsel continued to try to interest the banks in protecting their interests by providing them with notices of proceedings although they were not at that point entitled to notice.

15-2-00646-4

The skills required to perform the services were significant. Counsel’s expertise in homeowners' association matters is substantial. This matter required an understanding of emerging contemporary issues nationwide, and the strategic use of motions and litigation practice that helped to conclude the lawsuit efficiently and effectively, and favorably to his association client. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery.

15-02-00299-0

Mr. Wilson-Hoss is a highly experienced trial lawyer whose preparation and presentations to this Court have been excellent.

04-4-00217-0

The Court has reviewed the pleadings in this matter and is familiar with

counsel and his work. Counsel’s hourly rate is $250 per hour; the Court finds that this is low for counsel of his experience, and that a rate of $350 per hour would be supported. The Court finds that counsel’s work in this matter has been highly effective, and he has addressed several challenging, difficult and unique issues creatively, efficiently and to the benefit of his client. The Court finds also that Counsel is highly experienced in litigation matters in general and that his reputation is excellent. Counsel’s attorney fee claim is reasonable under all the circumstances. The Court finds that the attorney fee request should be granted.

13-2-00152-1

The skills required to perform the services were significant. Counsel’s expertise in litigated matters is substantial. This matter required an understanding of emerging contemporary issues nationwide, and the strategic use of motions and litigation practice that helped to conclude the lawsuit efficiently and effectively, and favorably to his association client. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery.

16-2-00250-5

Counsel’s expertise in matters involving homeowners’ associations is

significant. He currently represents about 40 similar associations, and has done so for about 15 years. His reputation and ability are excellent. Counsel prepares and presents his cases appropriately and professionally. Skills involved in his presentation of this matter included significant expertise in multiple aspects of homeowners’ associations and real property law, as well as expertise in preparation and presentation.

01-2-00448-8

Counsel’s experience in such matters is significant. He represents

about 40 similar homeowners’ associations, and has done so for over ten years. Counsel’s reputation and ability are excellent. Counsel prepares and presents his cased appropriately and professionally, which often results in successful outcomes for his clients.

00-2-00519-2

Counsel’s expertise in these matters is substantial. He has much experience with civil litigation in general. His reputation and ability, including preparation and presentation, are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally. He uses paralegals when appropriate as well as other measures to contain costs. He has substantial experience in real property and probate matters, and particularly with respect to nonprofits and owner associations. In addition, he takes measures to control costs by avoiding unnecessary aspects of matters and unnecessary pre-trial discovery.

14-2-00412-9

Counsel’s experience in such matters is significant. Since 1981, he has

represented claimants in thousands of matters. Counsel’s reputation and ability are excellent. Counsel prepares and presents his cases appropriately and professionally, which results in successful outcomes for his clients.

02-2-00321-8

Counsel’s experience in such matter is significant. He represents about 40

similar homeowners’ association, and has done so for over ten years. Counsel’s reputation and ability are excellent. Counsel prepares and presents his cases appropriately and professionally, which results in successful outcomes for his clients.

01-2-00514-0

Counsel’s expertise in matters involving real property is significant. Real property matters constitute a significant portion of his practice, and have for about 25 years. His reputation and ability are excellent. Counsel prepares and presents his cases appropriately and professionally. … Counsel routinely takes actions during the course of litigation to minimize his fees, including the appropriate use of paralegal time.

03-2-00461-1

Counsel’s expertise in matters involving homeowners’ associations is significant. He currently represents about 40 similar associations, and has done so for about 15 years. His reputation and ability are excellent. Counsel prepares and presents his cases appropriately and professionally. Skills involved in his presentation of this matter included significant expertise in multiple aspects of homeowners’ associations and real property law, as well as expertise in preparation and presentation.

01-2-00884-0, fees approved on appeal, 120 Wash. App. 246 (2004)

Counsel’s experience in such matters is significant. He represents about 30 similar homeowners’ associations, and has done so for over ten years. Counsel’s reputation and ability are excellent. Counsel prepares and presents his cases appropriately and professionally, which often results in successful outcomes for his clients. …Counsel used paralegal services in appropriate contexts in order to increase cost-effectiveness. Counsel also used other methods to reduce fees such as not bringing motions that could have been brought regarding discovery, summary judgment, and so on.

98-2-00481-2

The skills required to perform the services were commensurate with

Counsel’s experience and hourly rate. Counsel’s expertise in matters involving litigation is significant; he has more than 25 years’ experience litigating cases. His reputation and ability with respect to trial preparation and trial presentation are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally.

07-CV-1350

The skills required to perform the services was significant. Counsel’s expertise in matters involving real property is significant, including matters involving homeowners’ associations. Real property matters constitute a significant portion of his practice, and have for about 25 years. His reputation and ability with respect to real property matters, homeowners’ association matters, trial preparation and trial presentation are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally.

05-2-00141-1

The skills required to perform the services were significant. Counsel’s expertise in matters involving real property is significant. Real property matters constitute a significant portion of his practice, and have for about 30 years. In particular, homeowners’ association law has been an emphasis for more than 20 years. His reputation and ability with respect to real property matters, homeowners’ association law, hearing preparation, and hearing presentation are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally.

08-2-00027-7

The skills required to perform the services were significant. Counsel’s

expertise in matters involving real property is significant. Real property matters constitute a significant portion of his practice, and have for about 30 years. His reputation and ability with respect to real property matters, hearing preparation and hearing presentation are excellent. Counsel prepares and presents his cases appropriately, thoroughly and professionally.

07-2-00819-9

The questions involved included somewhat difficult applications of the law, consistent with the hourly rate charged and approved. The skills required to perform the services required were commensurate with counsels' experience and hourly rates. As to the skills and experience of counsel, Mr. Wilson-Hoss has very substantial experience in executions and Sheriff's sales of real property, and his reputation, skills and presentations to the Court are excellent.

08-4-00217-0