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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland Division

**OBSIDIAN FINANCE GROUP, LLC and
KEVIN D. PADRICK,**

Plaintiffs,

v.

CRYSTAL COX,

Defendant.

Civil No. CV 11-0057 HZ

**PLAINTIFFS' SUPPLEMENTAL
MOTION FOR ATTORNEY FEES
AND COSTS REGARDING
MOTION FOR SANCTIONS**

LR 7.1 CERTIFICATION

The undersigned counsel certifies that he made a good faith effort to confer with the defendant in connection with the original motion for sanctions (Docket No. 41), and was unable to resolve this matter. The undersigned counsel also sent an email to defendant yesterday in a follow up effort to confer on this motion, and defendant indicated she objects to the request for fees in this motion.

MOTION

On November 2, 2011, the Court issued an Order Granting in Part and Denying in Part Plaintiffs' Motion for Sanctions ("Order", Docket No. 57). In the Order, the Court granted plaintiffs' request for reasonable attorney fees associated with defendant's failure to attend the noticed deposition in Montana and stated that the amount of such fees would be decided after trial. Plaintiffs therefore file this supplemental motion for an order awarding them reasonable attorney fees in the amount of \$5,000, plus travel expenses incurred in the amount of \$831.97, and the court reporter's fee of \$250.00.

This motion is supported by the Declaration of David S. Aman filed herewith and the pleadings and papers already on file in this case.

DATED this 22nd day of December 2011.

TONKON TORP LLP

By: /s/ David S. Aman

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PLAINTIFFS' SUPPLEMENTAL MOTION FOR ATTORNEY FEES AND COSTS** on:

Crystal L. Cox
PO Box 505
Eureka, Montana 59917

Crystal @CrystalCox.com
savvybroker@yahoo.com

- ☒ by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to said party's last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below;
- ☒ by causing a copy thereof to be e-mailed to said party at her last-known email address on the date set forth below;

DATED this 22nd day of December 2011.

TONKON TORP LLP

By /s/ David S. Aman

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