

February 7, 2012

City of Gold Bar
Attn: Mayor Joe Beavers
107 – 5th Street
Gold Bar, WA 98251

Re: January 2012 Billing

General City Attorney Services (269.000)	1846.85
Block2 v. Gold Bar (269.103)	15259.80
Recall Petition (269.104)	1420.78
Block v. Gold Bar OPMA Violation Claim (269.106)	<u>251.35</u>
Current Month's Charges	18,778.78
Balance owing from last month on Recall Matter	<u>735.72</u>
GRAND TOTAL OWING:	19,514.50



City of Gold Bar
Attn: Mayor Joe Beavers
107 - 5th Street
Gold Bar WA 98251

Page: 1
January 31, 2012
Account No: 269-00000M
Statement No: 15501

General City Attorney Services
FOR PROFESSIONAL SERVICES RENDERED

Fees

			Hours
01/03/2012	AMS	Multiple e-mails related to C. Lie resignation [NO CHARGE].	0.10
	MJK	Review and respond to e-mails from Mayor; phone call with Mayor.	0.40
01/04/2012	AMS	E-mail to and from M. King related to PRRs [NO CHARGE].	0.10
	MJK	Review PRR from Mayor.	0.30
01/05/2012	AMS	E-mail from J. Beavers related to PRR; telephone call from K. Swoyer related to same [NO CHARGE].	0.10
01/06/2012	MJK	Phone call with J. Myers regarding litigation update; review PRR's.	0.90
01/10/2012	MJK	Prepare for and attend city council meeting.	2.20
01/11/2012	AMS	E-mail from J. Beavers related to PRRs; telephone call from J. Beavers related to same [NO CHARGE].	0.10
01/17/2012	AMS	Review e-mails related to PRRs; telephone call to J. Beavers related to same; e-mail from J. Beavers related to new lawsuit; telephone call with M. King related to same; research statutes related to same.	0.40
	MJK	Review e-mails; phone call with Mayor; review e-mail from Mayor; review new lawsuit from A. Block; conference with K. Swoyer and A. Soto regarding same.	0.70
01/18/2012	AMS	E-mail from M. King related to recall petition; e-mail from K. Swoyer related to new lawsuit; telephone call from M. King related to same [NO CHARGE].	0.10
01/23/2012	AMS	Review documents related to PRRs; telephone call to and from J. Beavers related to same; multiple e-mails to and from J. Beavers related to same; discussion with K. Swoyer related to same; discussion with M. King related to same.	1.90

General City Attorney Services
 FOR PROFESSIONAL SERVICES RENDERED

		Hours	
01/24/2012	AMS	Multiple telephone calls to and from J. Beavers related to PRRs; review documents related to same; e-mail to and from J. Beavers related to same; discussion with M. King related to same.	0.90
01/27/2012	AMS	Multiple e-mails related to PRRs; telephone call to J. Beavers related to same.	0.50
01/30/2012	AMS	Multiple e-mails related to PRRs; telephone call from J. Beavers related to same.	0.30
	MJK	Review e-mails from A. Block	0.20
01/31/2012	AMS	Telephone call from J. Beavers related to PRRs; review documents related to same; multiple discussions with M. King related to same; discussion with M. King related to litigation.	1.90
		For Current Services Rendered	11.10
			1,844.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Ann Marie Soto	0.40	\$0.00
Ann Marie Soto	6.00	135.00
Margaret J. King	4.70	220.00

Expenses

Photocopy charges	2.85
Total Expenses Thru 01/31/2012	2.85
Total Current Work	1,846.85
Previous Balance	\$5,195.66

Payments

01/12/2012	Payment	-4,452.20
02/02/2012	Payment	-743.46
	Total Payments	-5,195.66
	Balance Due	\$1,846.85

City of Gold Bar
Attn: Mayor Joe Beavers
107 - 5th Street
Gold Bar WA 98251

Page: 1
January 31, 2012
Account No: 269-10300M
Statement No: 15504

Block2 v. Gold Bar
FOR PROFESSIONAL SERVICES RENDERED

Fees

			Hours
01/03/2012	MAE	Review e-mails; update file and review for upcoming deadlines.	0.50
01/04/2012	KIS	Compile, prepare and organize documents for attorney notebook in preparation for depositions.	2.10
	AMS	Multiple e-mails to and from M. King and M. Kenyon related to depositions; research case law related to discovery.	1.40
	MJK	Conference with M. Kenyon and A. Soto regarding deposition preparation; prepare overview; review documents for deposition.	1.20
	MAE	Assist in gathering information for meeting regarding deposition preparation.	0.50
01/05/2012	AMS	Research case law related to discovery in PRA lawsuits; e-mail to M. Kenyon and M. King related to same; multiple e-mails to M. Kenyon and M. King related to Block deposition; meeting with M. Kenyon and M. King related to same.	3.30
	MRK	Review documents in preparations for depositions of Mayor and of A. Block, related conference with M. King and A. Soto.	2.40
	KIS	Prepare and organize documents for attorney review for deposition exhibits.	1.10
	MJK	Meet with M. Kenyon and A. Soto regarding litigation.	0.50
01/06/2012	MRK	Document review and conference with Mayor Beavers, M. King, and A. Soto in preparation for depositions of Beavers and Block.	1.90
	AMS	Meeting with J. Beavers, M. Kenyon and M. King related to depositions; telephone call with M. King related to same; discussion with M. Kenyon related to same.	1.40
	MJK	Meet with Mayor and M. Kenyon regarding deposition preparation and litigation; review numerous e-mails from A. Block; e-mail to A. Block.	1.10
01/07/2012	AMS	Multiple e-mails from M. King related to	

Block2 v. Gold Bar

FOR PROFESSIONAL SERVICES RENDERED

			Hours
		depositions; prepare exhibits related to same.	0.80
01/08/2012	MRK	Review documents, prepare for depositions of Mayor Beavers and A. Block.	2.80
01/09/2012	MRK	Prepare for and attend depositions of Mayor Beavers and A. Block.	9.20
	AMS	Travel to and attend deposition of J. Beavers and A. Block; telephone call with M. King related to same [NO CHARGE].	9.10
	MRK	Travel to and from depositions of Mayor Beavers and A. Block.	2.00
01/10/2012	MRK	E-mail from A. Block regarding settlement, reply e-mail to A. Block; conference with M. King and A. Soto regarding litigation strategy and settlement options.	0.50
	MAE	Discuss case status with A. Soto; draft City's second request for production of documents to plaintiff; finalize; update client file; review e-mails; review and copy materials produced at deposition.	3.40
	AMS	Meet with M. Kenyon and M. King related to depositions; e-mail from J. Beavers related to same; telephone call from J. Beavers related to same; discussion with M. Eichelberger related to RFPs; e-mail from M. Eichelberger related to same; review RFPs related to same.	2.90
	MJK	Prepare for and attend executive session; review e-mails from A. Block; meet with M. Kenyon and A. Soto.	1.00
01/11/2012	MAE	Discuss matter with M. King; review e-mails; update client files with record of numerous e-mails from A. Block; review court information; update pleadings file.	1.00
	KIS	Review incoming e-mails; review incoming notice of unavailability and update case information form regarding same [NO CHARGE].	0.30
	AMS	Discussion with M. King related to settlement offer; multiple e-mails from M. King related to same.	0.20
01/12/2012	MAE	Review upcoming deadlines.	0.20
	KIS	Continue to prepare and organize e-mails for file; meet with M. King regarding motion; prepare witness files and compile documents for same; telephone calls to and from court reporter regarding transcript; e-mails from and to court reporter regarding same.	2.00
	AMS	Multiple discussions with M. King related to Motion to Dismiss; draft declaration related to same; discussion with S. Kerlake related to deposition corrections; multiple discussions with M. King related to deposition corrections.	1.70
01/13/2012	AMS	Multiple telephone calls to and from J. Beavers	

City of Gold Bar

January 31, 2012

Account No: 269-10300M

Statement No: 15504

Block2 v. Gold Bar

FOR PROFESSIONAL SERVICES RENDERED

		Hours
	related to deposition; draft letter related to same; discussion with M. King related to same; telephone call with M. King related motion to dismiss.	0.90
01/17/2012	MAE Review e-mails; update client file.	0.20
	MRK Receive/review multiple e-mails from A. Block; conference with M. King and A. Soto regarding motion strategy.	0.40
	AMS Discussion with M. Kenyon related to lawsuit; multiple e-mails from M. King related to lawsuit; meeting with M. King and M. Kenyon related to same.	0.70
	MJK Draft Motion to Dismiss and Declaration; research regarding same.	0.90
01/18/2012	KIS Review, prepare and organize deposition transcripts for file and directory; e-mail same to client and M. King.	1.60
	AMS Multiple e-mails from M. Kenyon related to deposition transcripts [NO CHARGE].	0.10
	MJK Review transcript of depositions for Motion to Dismiss.	1.00
01/23/2012	KIS Review incoming untimely responses to discovery requests and meet with attorneys regarding same; perform research regarding lawsuit; e-mail to M. King regarding J. Beavers deposition transcript; retrieve and prepare e-mails at A. Soto request for her review; review incoming motion to modify ruling and prepare calendar regarding responsive briefing; prepare template for City's response to motion;	3.00
	MJK Review discovery responses from A. Block (.5); meet with A. Soto regarding same (.4); draft motion to dismiss and draft order and judgement (2.0).	2.90
01/24/2012	MJK Review Motion to Modify filed by A. Block and draft response to same.	5.60
	AMS Discussion with M. Kenyon related to discovery; multiple discussions with M. King related to discovery and Motion to Dismiss; telephone call with J. Beavers related to same; review documents related to same.	4.00
01/25/2012	KIS Meet with M. King regarding case plan.	0.30
	AMS Review documents related to discovery; discussion with M. King related to same; research rules related to same.	2.90
01/26/2012	MAE Work on records provided by plaintiff; forward to City.	0.50
	KIS Draft format for judgment; begin to review, proof and format Motion and M. King declaration; meet with M. King regarding procedures.	1.70

Block2 v. Gold Bar
 FOR PROFESSIONAL SERVICES RENDERED

			Hours
01/27/2012	KIS	Prepare messenger slips and calendar note for hearing; review, proof and format Motion to Dismiss and declaration; verify citations in brief; prepare exhibits regarding same; multiple telephone calls regarding messenger service.	3.70
	AMS	Review proposed order of dismissal; research court rules related to discovery.	0.70
01/29/2012	MJK	Finalize response to Motion to Modify and proposed Order.	1.70
01/30/2012	AMS	Multiple e-mails from A. Block related to lawsuit; discussion with M. King related to same; discussion with K. Swoyer related to same; telephone call with J. Beavers related to same.	0.40
	KIS	Meet with M. King regarding status; multiple e-mails from and to plaintiff regarding 12/30 order; meet with M. King regarding same; confirm status of court docket and telephone call to court regarding same.	1.30
01/31/2012	AMS	Telephone call from J. Beavers related to discovery; discussion with M. King related to motion to modify commissioner's order; multiple e-mails from M. King related to City's response to motion to modify; telephone call with M. King related to same; revise response related to same.	1.50
	MAE	Review court docket; review court rules; calendar deadlines; telephone call to confirmations clerk to confirm City's motion set for 2/3; discuss with attorneys.	0.50
	MJK	Edits to reponse to motion to modify; review e-mails from A. Block; edit motion to dismiss (.3).	1.80
		For Current Services Rendered	92.80
			13,645.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Michael R. Kenyon	2.00	\$75.00
Michael R. Kenyon	17.20	255.00
Ann Marie Soto	9.10	0.00
Ann Marie Soto	22.90	135.00
Mary A. Eichelberger	6.80	90.00
Margaret J. King	17.70	220.00
Kathy I. Swoyer	0.30	0.00
Kathy I. Swoyer	16.80	90.00

Expenses

Photocopy charges	143.40
Postage	3.02
Westlaw Computer Research	267.68
Total Expenses Thru 01/31/2012	414.10

January 31, 2012

Account No: 269-10300M

Statement No: 15504

City of Gold Bar

Block2 v. Gold Bar

FOR PROFESSIONAL SERVICES RENDERED

Advances

Process Server fees	50.00
Courier/Messenger fees	18.00
Court Reporter Fees	1,132.20
Total Advances Thru 01/31/2012	1,200.20
Total Current Work	15,259.80
Previous Balance	\$17,703.14

Payments

01/12/2012	Payment	-7,392.15
02/02/2012	Payment	-10,310.99
	Total Payments	-17,703.14
	Balance Due	<u>\$15,259.80</u>

City of Gold Bar
Attn: Mayor Joe Beavers
107 - 5th Street
Gold Bar WA 98251

Page: 1
January 31, 2012
Account No: 269-10400M
Statement No: 15505

Recall Petition
FOR PROFESSIONAL SERVICES RENDERED

			<u>Fees</u>	
				Hours
01/02/2012	MJK	Review e-mails from Mayor; review e-mails from A. Block regarding recall.		0.20
01/03/2012	MAE	Update file regarding recall petition; review e-mails.		0.20
	AMS	Multiple e-mails related to recall appeal [NO CHARGE].		0.10
	MJK	Research regarding recall sanctions; review e-mails from A. Block.		0.90
01/04/2012	KIS	Telephone call to bailiff regarding hearing.		0.30
01/05/2012	MJK	Research regarding recall and motion to dismiss for lack of jurisdiction; research regarding statutory provisions regarding appeal to Supreme Court.		1.90
	KIS	Telephone call from bailiff confirming availability for hearing; prepare calendar note for sanctions and costs for filing and service; meet with M. King regarding procedures.		1.60
01/06/2012	KIS	Compile incoming e-mails for file; confirm court procedures; calendar deadlines related to hearing on sanctions; review e-mails regarding change in deposition venue and notify interested parties regarding same.		0.90
01/12/2012	MAE	Review notice to withdrawal direct appeal to Washington Supreme Court; update client file.		0.20
01/13/2012	KIS	Review Supreme Court docket and note that withdrawal not filed; meet with M. King regarding same.		0.30
01/23/2012	AMS	Review deposition transcript; review plaintiff's discovery responses; discussion with M. King related to same.		1.90
01/25/2012	KIS	E-mail from and to M. King confirming filing and service of hearing set on sanctions and noting deadlines thereof.		0.20

City of Gold Bar

January 31, 2012

Account No: 269-10400M

Statement No: 15505

Recall Petition
FOR PROFESSIONAL SERVICES RENDERED

	Hours	
01/30/2012 KIS Confirm with court docket the entry of dismissal; meet with M. King regarding same.	0.50	
For Current Services Rendered	9.20	<u>1,294.50</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Ann Marie Soto	0.10	\$0.00
Ann Marie Soto	1.90	135.00
Mary A. Eichelberger	0.40	90.00
Margaret J. King	3.00	220.00
Kathy I. Swoyer	3.80	90.00

Expenses

Photocopy charges	1.50
Postage	0.88
Parking fees	6.00
Westlaw Computer Research	103.90
Total Expenses Thru 01/31/2012	<u>112.28</u>

Advances

Courier/Messenger fees	14.00
Total Advances Thru 01/31/2012	<u>14.00</u>

Total Current Work	1,420.78
--------------------	----------

Previous Balance	\$6,618.72
-------------------------	-------------------

Payments

01/12/2012 Payment	-2,941.50
02/02/2012 Payment	-2,941.50
Total Payments	<u>-5,883.00</u>

Balance Due	<u>\$2,156.50</u>
--------------------	--------------------------

City of Gold Bar
Attn: Mayor Joe Beavers
107 - 5th Street
Gold Bar WA 98251

Page: 1
January 31, 2012
Account No: 269-10600M
Statement No: 15506

Block v. City of Gold Bar OPMA Violation Claim
FOR PROFESSIONAL SERVICES RENDERED

Fees

		Hours	
01/17/2012	KIS Meet with M. King regarding new claim.	0.40	
01/18/2012	KIS Prepare and organize documents for new lawsuit.	0.60	
01/26/2012	KIS Notify attorney and make preparations to comply with deadlines; prepare Notice of Appearance for filing and service; prepare case maintenance form; prepare pleadings index; prepare caption for pleadings.	1.70	
	For Current Services Rendered	<u>2.70</u>	<u>243.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Kathy I. Swoyer	2.70	\$90.00

Expenses

Photocopy charges	1.35
Total Expenses Thru 01/31/2012	<u>1.35</u>

Advances

Courier/Messenger fees	7.00
Total Advances Thru 01/31/2012	<u>7.00</u>
Total Current Work	251.35

Balance Due \$251.35