

Michael R. Kenyon
Rachel B. Turpin
Ann Marie J. Soto
John P. Long, Jr.
Kim Adams Pratt
Robert F. Noe
David A. Linehan
Amy S. Mill
Charlotte A. Archer
Alexandra L. Kenyon



Bruce L. Disend
Doug F. Mosich
Of Counsel
Shelley M. Kerslake
1967 - 2014

RECEIVED OCT 13 2015

A handwritten signature in black ink, appearing to be "D", written over the date stamp.

October 7, 2015

City of Gold Bar
107 – 5th Street
Gold Bar, WA 98251

Re: September 2015 Billing

General City Attorney Services (269.000)	755.50
Block 1 v. City of Gold Bar (269.102)	7815.15
Block 3 v. City of Gold Bar (269.110)	2918.35
Block 4 v. City of Gold Bar (269.112)	7204.49
Block 5 v. City of Gold Bar (269.113)	<u>379.14</u>

Current Month's Charges

\$19,072.63

City of Gold Bar
 Attn: Mayor Linda Loen
 107 - 5th Street
 Gold Bar WA 98251

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 September 30, 2015
 Account No: 269-00000M
 Statement No: 183393

General City Attorney Services
 FOR PROFESSIONAL SERVICES RENDERED

		<u>Fees</u>	Hours	
09/11/2015	AMS	Meeting with L. Loen related to various City matters.	0.90	
09/17/2015	ALK	Review September 2010 PRR.	1.00	
09/18/2015	AMS	Meeting with L. Loen related to PRRs.	0.50	
09/21/2015	ALK	Review September 2010 PRR, revise exemption log related to same.	0.40	
09/22/2015	ALK	Phone call to D. Beaston regarding September 2010 PRR, phone calls with the City and conference with A. Soto related to same.	1.40	
09/23/2015	ALK	Review documents related to September 2010 PRR, meeting with the City related to same.	0.50	
09/24/2015	ALK	Receive phone call from City regarding September 2010 PRR.	0.10	
09/28/2015	AMS	Telephone call to L. Loen related to PRRs and litigation status.	0.30	
09/29/2015	ALK	Review and redact September 2010 PRR, prepare and send records to City.	0.90	
	AMS	Discussion with A. Kenyon related to PRRs.	0.20	
		For Current Services Rendered	6.20	755.50
Recapitulation				
	<u>Timekeeper</u>		<u>Hours</u>	<u>Rate</u>
	Ann Marie Soto		1.90	\$160.00
	Alexandra L. Kenyon		4.30	105.00
	Total Current Work			755.50
	Balance Due			<u>\$755.50</u>

City of Gold Bar
Attn: Mayor Linda Loen
107 - 5th Street
Gold Bar WA 98251

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September 30, 2015
Account No: 269-10200M
Statement No: 183394

Block1 v. City of Gold Bar
FOR PROFESSIONAL SERVICES PROVIDED

Previous Balance \$6,930.43

Fees

		Hours
09/01/2015	MRK Conference with A. Soto regarding discovery strategy.	0.30
09/04/2015	ALK Review case file for upcoming motion hearing [NO CHARGE].	0.70
09/09/2015	KIS Review incoming motion to continue hearing; prepare A. Soto working copies; meet with A. Soto regarding same; calendar deadlines for response and for hearing.	0.20
09/10/2015	KIS Check docket for current filing activity; meet with A. Soto regarding same; update pleadings file and index; review incoming motion to strike declaration; meet with A. Soto regarding same; prepare pleading template for response to Motion to Strike Beavers Declaration.	1.80
09/11/2015	AMS Meeting with M. Kenyon related to case strategy.	0.30
09/15/2015	MRK Receive/review several new motions and declarations from A. Block, related conference with A. Soto regarding City's responses.	0.60
	MAS Review and finalize Gold Bar's response to petitioner's motion to continue summary judgment motion; declaration of A. Soto and proposed order; exchange e-mails with Washington Legal to arrange for delivery; update file; review docket; telephone call to court confirmation desk regarding petitioner's motion to continue; discuss with A. Soto; telephone call with Washington Legal.	2.10
	AMS Meeting with M. Kenyon related to pending motions; draft response to Motion to Continue; draft Response to Motion to Strike Beavers Declaration; draft Response to Motion to Compel.	10.80
09/16/2015	KIS Prepare proposed order for City's Response to Motion to Compel; review, proof and finalize A. Soto declaration in support of City's Response; compile	

Blockl v. City of Gold Bar
FOR PROFESSIONAL SERVICES PROVIDED

		Hours
	and prepare additional exhibits for declaration; insert cites in declaration; organize and prepare exhibits to declaration; e-mail to messengers regarding instructions for declaration; begin to compile pleadings for A. Soto hearing notebook; telephone call to court reporter regarding transcription of 09.18.15 hearing.	4.00
AMS	Continue drafting response to Motion to Compel and related declaration; discussion with K. Swoyer related to hearing materials; discussion with M. Swan related to hearing confirmation.	6.40
09/17/2015 MAS	Review and finalize Gold Bar's Response to Plaintiff's Motion to Strike; declaration of A. Soto in Support of Gold Bar's Response to Plaintiff's Motion to Strike and Proposed Order; telephone call to Washington Legal; prepare messenger form with instructions for court filing and delivery to opposing party; review court docket; telephone call to confirmations clerk; discuss with A. Soto and K. Swoyer.	3.00
KIS	Review incoming Motion to Strike Summary Judgment; prepare confirmation of service of City's motion for A. Soto review; continue to compile documents for A. Soto hearing notebook; update files; revise proposed order, per A. Soto request; print out additional orders for A. Soto use.	2.40
AMS	Receive Block's Motion to Strike Summary Judgment motion; prepare for hearing on City's and Block's motions; telephone call to L. Loen related to same.	6.70
09/18/2015 KIS	Meet with A. Soto regarding result of today's hearing; revise proposed order regarding court's decision; prepare interlineation pursuant to court request; telephone call to court reporter regarding hearing transcript.	1.00
AMS	Prepare for, travel to and attend hearing on City's and Block's motions.	4.20
09/21/2015 KIS	Pursuant to court request during 9/18/15 hearing, prepare e-mail to bailiff enclosing proposed order and interlineation regarding confirmation of service; prepare same for mailing to opposing party.	0.80
09/22/2015 ALK	Conference with A. Soto regarding result of Summary Judgment motion hearing [NO CHARGE].	0.20
AMS	Discussion with M. Kenyon related to next steps.	0.30
09/25/2015 AMS	Review transcript from Summary Judgment hearing.	0.30
ALK	Review transcript from Summary Judgment hearing [NO CHARGE].	0.30
KIS	Review docket for status; finalize interlineations for filing; update file.	0.60
MRK	Brief review of court hearing transcript [NO CHARGE].	0.20
	For Current Services Rendered	47.20
		6,575.00

Block1 v. City of Gold Bar
FOR PROFESSIONAL SERVICES PROVIDED

Recapitulation		<u>Hours</u>	<u>Rate</u>
<u>Timekeeper</u>			
Michael R. Kenyon		0.20	\$0.00
Michael R. Kenyon		0.90	295.00
Ann Marie Soto		29.00	160.00
Mary A. Swan		5.10	105.00
Alexandra L. Kenyon		1.20	0.00
Kathy I. Swoyer		10.80	105.00

Expenses

Photocopy charges	140.52
Postage	0.70
Westlaw Computer Research	0.23
Total Expenses Thru 09/30/2015	<u>141.45</u>

Advances

Courier/Messenger fees	883.50
Court Reporter Fees	140.00
AIB - Document Retrieval Fees	75.20
Total Advances Thru 09/30/2015	<u>1,098.70</u>
Total Current Work	7,815.15

Payments

09/24/2015	Payment	-6,930.43
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Balance Due	<u>\$7,815.15</u>
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City of Gold Bar
 Attn: Mayor Linda Loen
 107 - 5th Street
 Gold Bar WA 98251

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 September 30, 2015
 Account No: 269-11000M
 Statement No: 183395

Block3 v. City of Gold Bar
 FOR PROFESSIONAL SERVICES RENDERED

Fees

			Hours
09/14/2015	KIS	Review incoming petition for review and e-mails regarding same; print out documents for attorney review; prepare calendar regarding responses.	0.60
09/15/2015	MRK	Receive/review Block's petition for review to Supreme Court, related conference with A. Soto regarding City's response.	0.50
	ALK	Receive/review Block's petition for review.	1.20
09/16/2015	ALK	Review of case file related to Petition for Review.	0.40
09/17/2015	ALK	Review case file and begin draft of answer to Block's petition for review.	1.80
09/22/2015	ALK	Continue drafting answer to petition for review.	1.60
09/23/2015	ALK	Draft answer to petition for review.	2.80
09/24/2015	MRK	Conference with A. Soto regarding City's answer to petition for review; review partial draft of same.	0.40
	ALK	Draft answer for petition for review.	5.90
09/25/2015	ALK	Draft answer for petition for review.	3.80
09/29/2015	AMS	Review Petition for Review; review and revise draft Answer to Petition for Review.	2.50
09/30/2015	AMS	Continue to revise Answer to Petition for Review. For Current Services Rendered	2.10
			23.60
			2,902.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Michael R. Kenyon	0.90	\$295.00
Ann Marie Soto	4.60	160.00
Alexandra L. Kenyon	17.50	105.00
Kathy I. Swoyer	0.60	105.00

Expenses

Photocopy charges

16.35

City of Gold Bar

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September 30, 2015
Account No: 269-11000M
Statement No: 183395

Block3 v. City of Gold Bar
FOR PROFESSIONAL SERVICES RENDERED

Total Expenses Thru 09/30/2015	<u>16.35</u>
Total Current Work	2,918.35
Balance Due	<u>\$2,918.35</u>

City of Gold Bar
Attn: Mayor Linda Loen
107 - 5th Street
Gold Bar WA 98251

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September 30, 2015
Account No: 269-11200M
Statement No: 183396

Block4 v. City of Gold Bar
FOR PROFESSIONAL SERVICES RENDERED

Previous Balance \$2,737.23

Fees

		Hours
09/01/2015	ALK Conference with A. Soto and M. Kenyon regarding litigation strategy [NO CHARGE].	0.40
	MCS Review court rules and conduct legal research regarding service issues related to A. Block's Notice of Deposition to City; meet with A. Soto and D. Linehan regarding same.	0.40
	DAL Confer with A. Soto and M. Starkey on civil rules interpretation questions relating to depositions; follow-up e-mails regarding same.	0.40
	AMS Meeting with M. Kenyon related to case strategy; research case law and court rules; telephone call to L. Loen related to same; draft Motion to Dismiss.	7.80
09/02/2015	DAL Confer with A. Soto regarding dispute concerning depositions; review and suggest revisions to draft motion to dismiss or alternatively to stay; further e-mails with A. Soto regarding improper deposition notices and motion; review correspondence with court reporter and plaintiff; review and provide comments on draft e-mail to plaintiff regarding same.	1.50
	KIS Review and proof A. Soto declaration and motion; format chart in motion; compile and prepare exhibits.	3.70
	AMS E-mails and telephone calls to and from D. Linehan, K. Swoyer and A. Block related to Motion to Dismiss and depositions; review and revise Motion and related documents.	2.30
09/03/2015	MAS Review e-mail from court reporter; prepare working copy of transcript; update file.	0.20
	KIS Finalize declaration and exhibits for today's motion filing and service; label exhibits; calendar deadlines for responses to motion; notify messengers regarding filing and service requirements; begin to prepare A. Soto hearing notebook.	3.90
	AMS E-mails to and from A. Block related to depositions; discussion with K. Swoyer related to Motion to Dismiss; telephone call to L. Loen related to same.	0.80

Block4 v. City of Gold Bar
FOR PROFESSIONAL SERVICES RENDERED

		Hours
09/08/2015	AMS Telephone calls to and from L. Loen related to case status; e-mail from A. Block related to upcoming hearing.	0.30
09/09/2015	AMS E-mails and telephone calls to and from K. Swoyer and A. Block related to Motion to Disqualify.	0.40
09/10/2015	DAL Review e-mails and pleadings from A. Block regarding upcoming hearing and confer with A. Soto regarding strategy for same.	0.30
	ALK Conference with A. Soto regarding litigation strategy, prepare for motion [NO CHARGE].	0.90
	KIS Check docket for current filing activity; meet with A. Soto regarding same; compile and organize additional materials for A. Soto hearing notebook and finalize same; prepare alternative orders for judge's preference; telephone call to and from court reporter to request recording of 9/11/15 hearing; meet with A. Soto regarding same.	1.70
	AMS E-mails to and from and meeting with D. Linehan related to hearing on Motion to Dismiss; telephone call to L. Loen related to same; prepare for hearing.	3.50
09/11/2015	DAL Exchange e-mail with A. Soto regarding strategy for hearing on motion to dismiss or to stay discovery; confer with K. Swoyer regarding hearing.	0.20
	MAS Order transcript for today's motion before Judge Appel; prepare letter to court reporter transmitting payment.	0.40
	ALK Travel to and attend hearing on motion to dismiss, attend meeting with L. Loen and J. Beavers related to same [NO CHARGE].	4.00
	KIS Calendar upcoming deadlines and notify attorneys regarding same; update files.	0.80
	AMS Prepare for, travel to and attend hearing on Motion to Dismiss.	4.00
09/17/2015	MAS Update file.	0.40
	ALK Review of pleadings, receive/review e-mails from M. Kenyon related to same [NO CHARGE].	0.90
09/22/2015	AMS Discussion with M. Swan related to Motion for Reconsideration.	0.20
09/25/2015	AMS Begin drafting Response to Motion for Reconsideration; discussion with M. Kenyon related to same; research related to same.	1.80
	KIS Calendar deadline for response to motion for reconsideration; update file.	0.40
09/28/2015	AMS Continue drafting Response to Motion for Reconsideration.	3.40
09/29/2015	AMS Continue drafting Response to Motion for Reconsideration; discussion with M. Kenyon related to same.	2.40

Block4 v. City of Gold Bar
 FOR PROFESSIONAL SERVICES RENDERED

	Hours	
CAA		Revise Response in opposition to Plaintiff's Motion for Reconsideration regarding dismissal of Complaint for failure to comply with Court's CR 12(e) Order.
	0.80	
09/30/2015 AMS		Continue to revise Response to Motion for Reconsideration; conference with C. Archer related to same.
	2.90	
CAA		Continue to draft and revise Response in opposition to Plaintiff's Motion for Reconsideration regarding dismissal of Complaint for failure to comply with Court's CR 12(e) Order [NO CHARGE].
	2.20	
	53.30	For Current Services Rendered
		<u>6,723.50</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Ann Marie Soto	29.80	\$160.00
David A. Linehan	2.40	240.00
Margaret C. Starkey	0.40	120.00
Mary A. Swan	1.00	105.00
Charlotte A. Archer	2.20	0.00
Charlotte A. Archer	0.80	155.00
Alexandra L. Kenyon	6.20	0.00
Kathy I. Swoyer	10.50	105.00

Expenses

Photocopy charges	31.95
Postage	4.24
Parking fees	6.00
Total Expenses Thru 09/30/2015	<u>42.19</u>

Advances

Process Server fees	237.00
Courier/Messenger fees	157.80
Court Reporter Fees	44.00
Total Advances Thru 09/30/2015	<u>438.80</u>

Total Current Work 7,204.49

Payments

09/24/2015 Payment -2,737.23

Balance Due \$7,204.49

City of Gold Bar
 Attn: Mayor Linda Loen
 107 - 5th Street
 Gold Bar WA 98251

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 September 30, 2015
 Account No: 269-11300M
 Statement No: 183397

Block5 v. City of Gold Bar
 FOR PROFESSIONAL SERVICES RENDERED

Fees

			Hours	
09/22/2015	AMS	Review complaint; research related to same.	0.30	
	MRK	Conference with A. Soto regarding strategy to dismiss new Block lawsuit.	0.30	
09/23/2015	KIS	Finalize notice of appearance for filing and service.	0.60	
09/24/2015	AMS	Meeting with M. Kenyon related to case strategy; research related to same.	0.80	
09/25/2015	KIS	Review case materials and begin to set up case file; prepare case information form.	0.40	
		For Current Services Rendered	2.40	369.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>
Michael R. Kenyon	0.30	\$295.00
Ann Marie Soto	1.10	160.00
Kathy I. Swoyer	1.00	105.00

Expenses

Photocopy charges	2.16
Postage	0.48
Total Expenses Thru 09/30/2015	2.64

Advances

Courier/Messenger fees	7.00
Total Advances Thru 09/30/2015	7.00

Total Current Work 379.14

Balance Due \$379.14