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ROBERT C. KEATING (1915-2001)

April 5, 2018

Ms. Lisa Stowe  
107 5th Street  
Gold Bar, WA 98251

RE: Gold Bar PRA 15-2-06148-6 adv. Block

Dear Ms. Stowe:

Please find enclosed our **Interim Fee Statement** for services rendered in the above-referenced matter.

Thank you for allowing us to be of service to you.

Sincerely,

Rechilda D. Grefalda  
Billing Department

RG/encl

1269-001

# Keating, Bucklin & McCormack, Inc., P.S.

801 Second Avenue, Suite 1210  
Seattle, WA 98104-1576

April 04, 2018  
Invoice 10451  
Client Matter 1269-00001

City of Gold Bar  
Lisa Stowe  
107 5th Street  
Gold Bar WA 98251

**Fees Billed Inception to Date: \$74,566.00**

**Disbursements Billed Inception to Date: \$7,616.94**

## Regarding

Gold Bar PRA 15-2-06148-6 adv. Anne Block  
Opened: 10/7/2016  
File Type: Litigation-General

<u>Date</u>	<u>Professional Services Rendered</u>	<u>Atty</u>	<u>Hours</u>
03/01/2018	Analysis regarding potential motion for sanctions based on harassment of lawyers, staff, review prior emails for evidence to support same.	AGB	0.50
03/01/2018	Multiple emails from Anne Block.	AGB	0.20
03/01/2018	Review Plaintiff responses to initial discovery requests and documents produced.	DCC	1.20
03/01/2018	Email correspondence from Plaintiff.	DCC	0.10
03/01/2018	Legal research and analysis	DCC	1.00
03/01/2018	Plan strategy for addressing barrage of harassing emails from Anne Block.	SMR	0.30
03/04/2018	Email from Block.	DCC	0.10
03/05/2018	Research and analysis regarding motion for sanctions based on Plaintiff's abuse of attorneys, staff, etc.	AGB	0.50
03/07/2018	Review email correspondence from Block; strategy and analysis regarding potential motion for a continuance.	DCC	0.20
03/07/2018	Emails from Anne Block.	SMR	0.10
03/08/2018	E-mail from Anne Block.	SMR	0.10
03/08/2018	Email to Mayor Clem.	SMR	0.10
03/09/2018	Legal analysis regarding deposition of C. Pennington.	AGB	0.50

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03/09/2018	Multiple emails from A. Block.	AGB	0.20
03/09/2018	Analysis regarding expiration of subpoenas for depositions.	AGB	0.60
03/09/2018	Receive and review notice of appeal.	AGB	0.30
03/09/2018	Analysis regarding potential motion for a protective order.	AGB	0.80
03/09/2018	Analysis of early procedural history for purposes of preparing a motion for protective order regarding mayor deposition.	AGB	0.60
03/09/2018	Email from Block.	AGB	0.10
03/09/2018	E-mail from Mayor Clem.	SMR	0.10
03/10/2018	Email from Block.	AGB	0.10
03/11/2018	Email from Block.	AGB	0.10
03/12/2018	Prepare evidence in support of motion for protective order and request for terms.	AGB	1.30
03/12/2018	Prepare motion for protective order and request for terms.	AGB	1.20
03/12/2018	Emails from A. Block.	AGB	0.20
03/12/2018	Telephone call to A. Block.	AGB	0.10
03/12/2018	Prepare evidence/examples of Plaintiff's abusive conduct toward attorneys, staff, and City employees.	AGB	1.10
03/12/2018	Prepare declaration of Amanda G. Butler in support of Motion for Protective Order.	AGB	0.50
03/12/2018	Continue work on motion for protective order.	AGB	1.30
03/12/2018	Multiple emails from A. Block regarding depositions.	AGB	0.30
03/12/2018	Legal research and analysis.	AGB	0.50
03/12/2018	Receive and review notice of appeal.	SMR	0.10
03/12/2018	Email to client.	SMR	0.10
03/12/2018	Receive and review notice of deposition.	SMR	0.10
03/13/2018	Prepare declaration of Bill Clem in support of motion for protective order.	AGB	0.50
03/13/2018	Continue work on declaration of AGB in support of motion for protective order and request for terms--extensive exhibits.	AGB	2.10
03/13/2018	Continue work on motion for protective order regarding depositions of Bill Clem and Crystal Hill Pennington as well as supporting declaration of SMR and Bill Clem.	AGB	1.70
03/13/2018	Prepare a proposed order and an alternative proposed order regarding the depositions of Pennington and Clem.	AGB	0.50
03/13/2018	Email from potential witness.	AGB	0.10
03/13/2018	Supplement procedural history in motion for protective order.	AGB	0.60
03/13/2018	Emails from Court regarding Plaintiff's emails.	AGB	0.20

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03/13/2018	Analysis regarding meet and confer obligation prior to filing Motion for Protective Order.	AGB	0.20
03/13/2018	Research and analysis regarding abuse by Plaintiff	AGB	0.60
03/13/2018	Emails from Anne Block.	SMR	0.20
03/13/2018	E-mails from Kelsey O'Neal.	SMR	0.20
03/13/2018	Telephone conference with Bill Clem.	SMR	0.50
03/13/2018	E-mail from Bill Clem.	SMR	0.10
03/13/2018	Prepare motion for protective order and supporting evidence.	SMR	0.40
03/13/2018	Receive and review evidence from Bill Clem.	SMR	0.10
03/14/2018	Email from A. Block.	AGB	0.10
03/14/2018	Email from Denise Beaston.	AGB	0.10
03/14/2018	Email to Block.	AGB	0.10
03/14/2018	Receive and review order from court.	AGB	0.20
03/14/2018	Modify motion for protective order based on Plaintiff's latest emails/change in strategy.	AGB	0.50
03/14/2018	Email to Mayor Clem.	SMR	0.10
03/14/2018	Receive and review order regarding reconsideration.	SMR	0.10
03/15/2018	Email from Plaintiff.	AGB	0.10
03/16/2018	Multiple emails from Plaintiff.	AGB	0.30
03/16/2018	Modify Motion for Protective Order and AGB Declaration in Support based on procedural developments.	AGB	0.90
03/16/2018	Receive and review letter from Richard Johnson.	SMR	0.10
03/19/2018	Multiple emails from Plaintiff.	AGB	0.20
03/19/2018	Emails from Anne Block.	SMR	0.10
03/20/2018	Receive and review multiple emails from Plaintiff.	AGB	0.30
03/20/2018	Legal research and analysis.	AGB	0.50
03/20/2018	Supplement proposed orders regarding motion for protective order.	AGB	0.40
03/20/2018	Supplement AGB declaration and exhibits thereto regarding motion for protective order.	AGB	0.60
03/20/2018	Emails from Anne Block.	SMR	0.10
03/21/2018	Email from Block.	AGB	0.10
03/25/2018	Emails from A. Block.	AGB	0.20
03/26/2018	Strategy regarding MFPO in light of Block's latest emails.	AGB	0.30
03/26/2018	Strategy regarding handling of improper appeal.	AGB	0.30
03/26/2018	Telephone call with Court of Appeals.	AGB	0.30

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03/26/2018	Prepare reply on motion to quash.	AGB	0.50
03/26/2018	Prepare AGB declaration in support of reply on Motion for Protective Order.	AGB	0.40
03/26/2018	Receive and review Plaintiff's motion regarding SLAPP and supporting declarations/exhibits.	AGB	0.40
03/26/2018	Receive and review notice of filing of statement of arrangements.	SMR	0.10
03/27/2018	Evaluate potential response to Plaintiff's SLAPP motion.	AGB	0.20
03/27/2018	Prepare for oral argument on motion for protective order.	AGB	0.80
03/27/2018	Research regarding court commissioner hearing motion for protective order.	AGB	0.20
03/27/2018	Receive and review materials from A. Block.	AGB	0.40
03/27/2018	Receive and review Plaintiff's supplemental briefing regarding motion for protective order.	AGB	0.30
03/27/2018	Telephone calls from Block.	AGB	0.20
03/27/2018	Research and analysis regarding potential emergency motion.	AGB	0.30
03/28/2018	Continue preparation for oral argument and arguments to address misc arguments raised by Block at eleventh hour.	AGB	1.10
03/28/2018	To Snohomish county Superior Court for oral argument regarding discovery motion.	AGB	2.50
03/28/2018	Emails from Block.	AGB	0.20
03/28/2018	Legal research and analysis.	AGB	0.50
03/29/2018	Multiple emails from Plaintiff.	AGB	0.20
03/30/2018	Email from Block.	AGB	0.10
03/30/2018	Telephone call to Crystal Hill Pennington.	AGB	0.10
03/31/2018	Email from Block.	AGB	0.10

**Total Hours Billed: 37.20**

**Total for Services: 9572.70**

<u>Attorney Recap</u>	<u>Personnel Type</u>	<u>Hours</u>	<u>Rate</u>
Amanda Butler	Senior Associate	31.50	\$255.00
Derek C. Chen	Associate	2.60	\$249.00
Shannon M. Ragonesi	Shareholder	3.10	\$288.00

<u>Date</u>	<u>Disbursements</u>	<u>Amount</u>
03/08/2018	ABC Legal Messengers / special delivery 03/01/18; response to Motion Reconsideration; declaration of SMR with Exhibits A-I; proposed order	65.65

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03/08/2018	Seattle Legal Messengers / Delivery 03/01/18; Defendant City of Gold Bar's response to Plaintiffs Motion for Reconsideration and request for terms; declaration of SMR	293.41
03/08/2018	ABC Legal Messengers / special delivery 02/28/18; Notice of Appearance AGB	39.95
03/15/2018	Seattle Legal Messengers / Deliver 03/02/18; Defendant Gold Bar's second interrogatories and Requests for Production of documents to Plaintiff Anne Block	285.00
03/15/2018	Seattle Legal Messengers / Delivery 03/08/18; Respondent's Answer to Petitioner's Motion for Discretionary Review; Affidavit of S. Ragonesi	285.00
03/28/2018	Seattle Legal Messengers / Delivery 03/27/18; Declaration of AGB; Defendant City of Gold Bar's Reply regarding City's Motion for Protective Order	285.00
03/29/2018	ABC Legal Messengers special delivery 03/27/18; reply regarding Motion for Protective Order; AGB declaration and Exhibits A-E	68.45
03/29/2018	Seattle Legal Messengers / Delivery on 03/21/18; Calendar note; Motion for Protective Order, Declaration of AGB, declaration of Mayor Clem and proposed order	40.50
03/29/2018	Seattle Legal Messengers / Delivery on 03/21/18; Calendar Note, Motion for Protective Order; Declaration of AGB, Declaration of Mayor Clem and proposed order	285.00
03/31/2018	CourtTrax / transaction searches for the month	12.50
03/01/2018	Photocopies B&W (3)	0.60
03/01/2018	Photocopies B&W (3)	0.60
03/01/2018	Photocopies B&W (2)	0.40
03/01/2018	Photocopies B&W (20)	4.00
03/01/2018	Photocopies B&W (3)	0.60
03/01/2018	Photocopies B&W (12)	2.40
03/01/2018	Photocopies B&W (2)	0.40
03/01/2018	Photocopies B&W (4)	0.80
03/01/2018	Photocopies B&W (3)	0.60
03/01/2018	Photocopies B&W (3)	0.60
03/01/2018	Photocopies B&W (4)	0.80
03/01/2018	Photocopies B&W (9)	1.80
03/01/2018	Postage - pleadings	3.31
03/05/2018	Photocopies B&W (1)	0.20
03/06/2018	Photocopies B&W (1)	0.20

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03/06/2018	Photocopies B&W (1)	0.20
03/06/2018	Photocopies B&W (1)	0.20
03/13/2018	Photocopies B&W (2)	0.40
03/13/2018	Photocopies Color	7.00
03/13/2018	Photocopies B&W (7)	1.40
03/13/2018	Photocopies B&W (3)	0.60
03/13/2018	Photocopies Color	0.35
03/13/2018	Photocopies B&W (2)	0.40
03/13/2018	Photocopies B&W (33)	6.60
03/13/2018	Photocopies Color	6.65
03/13/2018	Photocopies Color	0.35
03/13/2018	Photocopies B&W (2)	0.40
03/13/2018	Photocopies Color	0.70
03/13/2018	Photocopies B&W (7)	1.40
03/13/2018	Photocopies Color	12.60
03/14/2018	Photocopies Color	0.70
03/14/2018	Photocopies B&W (1)	0.20
03/21/2018	Postage - Motion for Protective Order to Block	7.25
03/22/2018	Photocopies B&W (18)	3.60
03/22/2018	Photocopies B&W (163)	32.60
03/22/2018	Photocopies B&W (4)	0.80
03/23/2018	Photocopies B&W (1)	0.20
03/27/2018	Photocopies B&W (6)	1.20
03/27/2018	Photocopies Color	2.10
03/27/2018	Photocopies Color	7.00
03/27/2018	Photocopies B&W (12)	2.40
03/27/2018	Photocopies B&W (14)	2.80
03/27/2018	Photocopies B&W (14)	2.80
03/27/2018	Photocopies B&W (1)	0.20
03/27/2018	Photocopies B&W (1)	0.20
03/27/2018	Photocopies B&W (5)	1.00
03/27/2018	Photocopies B&W (1)	0.20
03/28/2018	Photocopies B&W (1)	0.20
03/30/2018	Miscellaneous Disbursements / WSBA Certificate of Status History/PRR	32.50

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**Total Disbursements** 1,814.97

## Payments

01/05/2018	Payment	City of Gold Bar	707.90
03/26/2018	Payment	City of Gold Bar	<u>6,759.90</u>
<b>Sub-total Payments:</b>			<b>\$7,467.80</b>

## Totals for this Matter

Prior Balance:	\$7,467.80
Payments Received:	\$7,467.80
Current Charges:	\$11,387.67
<b>Balance Due:</b>	<b>\$11,387.67</b>