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February 7, 2019

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

RE: Gold Bar PRA15-2-06148-6 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/Enclosure

1269-001

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

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

February 06, 2019
Invoice 11881
Client Matter 1269-00001

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

Fees Billed Inception to Date: **\$106,538.50**

Disbursements Billed Inception to Date: **\$12,509.49**

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>
12/18/2018	Legal analysis and review of court record for purposes of Motion for Summary Judgment.	AGB	0.70
12/19/2018	Prepare Motion for Summary Judgment on remaining claims.	AGB	0.10
12/26/2018	Evaluate Plaintiff's violation of her own notice of unavailability, timing of Motion for Summary Judgment.	AGB	0.50
12/28/2018	Prepare Motion for Summary Judgment on remaining claims.	AGB	3.10
12/28/2018	Prepare evidence in support of second Motion for Summary Judgment.	AGB	0.90
12/28/2018	Email to Eileen Keiffer.	AGB	0.10
12/31/2018	Review court calendar for noting motion.	AGB	0.20
12/31/2018	Prepare third Motion for Summary Judgment dismissal of remaining claim.	SMR	0.50
01/01/2019	Receive and review order denying plaintiff's motion to modify.	SMR	0.10
01/02/2019	Analysis regarding Block's previous submissions to court and timing of same for purposes of second Motion for Summary Judgment.	AGB	0.50
01/03/2019	Prepare evidentiary record for second Motion for Summary Judgment dismissing remaining claim regarding metadata.	AGB	0.90

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01/03/2019	Compare what Plaintiff served on City during first Motion for Summary Judgment and compare with what was actually filed for purposes of second Motion for Summary Judgment.	AGB	1.10
01/04/2019	Finalize second Motion for Summary Judgment and voluminous declarations and exhibits supporting the same.	AGB	1.40
01/08/2019	Email from Plaintiff.	AGB	0.10
01/09/2019	Multiple emails from Plaintiff.	AGB	0.20
01/09/2019	Email from Court.	AGB	0.10
01/09/2019	Email from Plaintiff.	AGB	0.10
01/09/2019	Prepare amended note for motion-- MSJ.	AGB	0.10
01/10/2019	Receive and review motion for fees costs expenses and statutory penalties.	AGB	0.90
01/10/2019	Multiple emails from Plaintiff.	AGB	0.20
01/10/2019	Analysis regarding PRA.	AGB	0.50
01/10/2019	Analysis regarding procedural history.	AGB	0.60
01/10/2019	Analyze case law relied upon by Plaintiff in motion for fees, costs, expenses etc.	AGB	0.80
01/10/2019	Receive and review motion for penalties and fees from plaintiff.	SMR	0.20
01/10/2019	Outline response to motion.	SMR	0.30
01/11/2019	Email from Court.	AGB	0.10
01/11/2019	Strategy regarding opposition to plaintiff's motion for fees, costs and expenses and penalties.	AGB	0.50
01/11/2019	Analyze court record and compare/contrast with Plaintiff's motion for fees.	AGB	0.90
01/14/2019	Email from Plaintiff.	AGB	0.10
01/14/2019	Telephone call to Bonnie Jones.	AGB	0.10
01/14/2019	Review response to Plaintiff's motion for fees, etc. and edit the same.	AGB	0.60
01/14/2019	Prepare Derek Chen declaration.	DCC	0.20
01/14/2019	Prepare opposition to plaintiff's motion for penalties and fees.	SMR	6.40
01/15/2019	Telephone call from Bonnie Jones.	AGB	0.10
01/15/2019	Multiple emails from plaintiff and court.	AGB	0.20
01/15/2019	Telephone call with Bonnie Jones.	AGB	0.20
01/15/2019	Continue to prepare opposition to motion for fees.	AGB	0.40
01/16/2019	Telephone call to Bonnie Jones.	AGB	0.20
01/16/2019	Evaluate motion for sanctions in light of unconfirmed hearing on terms.	AGB	0.20

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01/16/2019	Finalize motion opposition, declarations and evidence.	SMR	1.00
01/22/2019	Analysis regarding motion for sanctions against Plaintiff	AGB	0.50
01/22/2019	Telephone conference with Bonnie Jones.	SMR	0.20
01/24/2019	Prepare second motion for terms under CR 11.	AGB	1.60
01/24/2019	Supplement first motion for terms based on serial violations of court order.	AGB	0.50
01/24/2019	E-mails (x2) from Anne Block.	SMR	0.20
01/24/2019	E-mail from Kristen Lange to all parties.	SMR	0.10
01/24/2019	Email to plaintiff and court.	SMR	0.10
01/25/2019	Analyze emails from Plaintiff for purposes of evidence of violation of court order.	AGB	0.80
01/25/2019	Emails from Anne Block.	SMR	0.10
01/28/2019	Analyze Plaintiff's history of noting and striking motions without notice.	AGB	0.40
01/28/2019	Supplement motion for sanctions.	AGB	1.20
01/28/2019	Prepare AGB declaration in support of motion for terms.	AGB	0.30
01/28/2019	Telephone call with Bill Clem.	AGB	0.20
01/29/2019	Read and analyze Plaintiff's response to motion for summary judgment.	AGB	0.70
01/29/2019	Read and analyze Plaintiff's amended motion for fees and penalties and supporting declaration.	AGB	0.50
01/29/2019	Finalize motion for sanctions.	SMR	0.30
01/30/2019	Telephone call with Bonnie Jones.	AGB	0.20
01/30/2019	Telephone call with Bill Clem.	AGB	0.10
01/30/2019	Prepare response to Plaintiff's Second Motion for Fees, Costs and Penalties.	AGB	1.30
01/30/2019	Analyze invoices submitted by Plaintiff in support of her fee request.	AGB	1.20
01/30/2019	Prepare reply on City's Second Motion for Summary Judgment	AGB	1.00
01/30/2019	Analyze Plaintiff's ER 404 argument.	AGB	0.70
01/30/2019	Analyze Plaintiff's collateral estoppel argument.	AGB	0.70
01/30/2019	Telephone conference with Bonnie Jones.	SMR	0.20
01/31/2019	Multiple emails from Block.	AGB	0.20
01/31/2019	Research and analysis regarding Plaintiff's claimed cost recovery.	AGB	0.80
01/31/2019	Supplement opposition to Plaintiff's Second Motion for Penalties, Fees and Costs.	AGB	1.50
01/31/2019	Prepare Motion for Summary Judgment Reply.	AGB	1.20

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01/31/2019	Emails from Plaintiff.	AGB	0.20
01/31/2019	Review legal authority for fee motion.	SMR	0.50

Total Hours Billed: 42.90

Total for Services: 11274.90

<u>Attorney Recap</u>	<u>Personnel Type</u>	<u>Hours</u>	<u>Rate</u>
Amanda Butler	Senior Associate	32.50	\$255.00
Derek C. Chen	Associate	0.20	\$249.00
Shannon M. Ragonesi	Shareholder	10.20	\$288.00

<u>Date</u>	<u>Disbursements</u>	<u>Amount</u>
01/16/2019	Seattle Legal Messengers / delivery on 1/10/19; Amended note for motion	41.25
01/17/2019	Seattle Legal Messengers / Delivery on 01/07/19; Note for Motion; Defendant's 2nd Motion for Summary Judgment; declaration of Ragonesi; supplemental declaration of Ragonesi; declaration of Jones; declaration of Beavers; 2nd declaration of Beavers; proposed order	66.50
01/24/2019	Business Card/ affidavit declaration certificate confirmation	4.50
01/24/2019	Seattle Legal Messengers / response to Plaintiffs motion for fees; declaration of Derek Chen; declaration of Shannon Ragonesi; proposed order; declaration of Joe Beaver; declaration of Bonnie Jones	73.00
01/24/2019	Business Card / affidavits; declaration	13.00
01/24/2019	Business Card / notice of trial date	1.75
01/24/2019	Business Card / declaration affidavit	1.75
01/31/2019	CourtTrax / January 2019 transaction searches	10.00
01/31/2019	Seattle Legal Messengers / Delivery on 1/16/19; Defendant city of Gold Bar's opposition to Plaintiffs motion for fees, costs, expenses and for statutory penalties; declaration of DCC; declaration of SMR; proposed order denying Plaintiffs motion for fees, costs, expenses and for statutory penalties	235.00
01/04/2019	Photocopies Color	39.55
01/04/2019	Photocopies B&W (2)	0.40
01/04/2019	Photocopies B&W (2)	0.40
01/04/2019	Photocopies B&W (6)	1.20
01/04/2019	Photocopies B&W (255)	51.00
01/04/2019	Photocopies B&W (3)	0.60
01/04/2019	Photocopies Color	7.00

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01/04/2019	Photocopies B&W (2)	0.40
01/04/2019	Photocopies Color	39.55
01/04/2019	Photocopies Color	0.70
01/04/2019	Photocopies Color	1.05
01/04/2019	Photocopies Color	0.70
01/04/2019	Photocopies Color	1.05
01/04/2019	Photocopies Color	4.20
01/04/2019	Photocopies B&W (6)	1.20
01/04/2019	Photocopies B&W (2)	0.40
01/04/2019	Photocopies Color	29.40
01/04/2019	Photocopies B&W (26)	5.20
01/04/2019	Photocopies B&W (12)	2.40
01/04/2019	Photocopies B&W (1)	0.20
01/04/2019	Photocopies Color	4.20
01/04/2019	Photocopies Color	0.35
01/04/2019	Photocopies Color	1.05
01/04/2019	Photocopies B&W (14)	2.80
01/04/2019	Photocopies Color	70.70
01/04/2019	Photocopies B&W (6)	1.20
01/04/2019	Photocopies Color	86.10
01/04/2019	Photocopies B&W (1)	0.20
01/04/2019	Photocopies Color	3.50
01/04/2019	Photocopies Color	133.70
01/04/2019	Photocopies Color	3.50
01/04/2019	Photocopies Color	79.10
01/04/2019	Photocopies B&W (450)	90.00
01/04/2019	Photocopies Color	7.00
01/04/2019	Photocopies Color	51.45
01/04/2019	Photocopies B&W (2)	0.40
01/04/2019	Photocopies Color	1.40
01/04/2019	Photocopies B&W (4)	0.80
01/04/2019	Photocopies Color	1.75
01/04/2019	Photocopies Color	6.65
01/04/2019	Photocopies B&W (16)	3.20
01/04/2019	Photocopies Color	21.00

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01/04/2019	Photocopies Color	1.40
01/04/2019	Photocopies B&W (5)	1.00
01/04/2019	Photocopies Color	1.40
01/04/2019	Photocopies Color	87.15
01/04/2019	Photocopies Color	86.10
01/04/2019	Photocopies B&W (39)	7.80
01/04/2019	Photocopies Color	11.20
01/07/2019	Postage - Defendant's 2nd Motion for Summary Judgment to Block	18.50
01/07/2019	Photocopies Color	0.70
01/07/2019	Photocopies B&W (14)	2.80
01/07/2019	Photocopies B&W (2)	0.40
01/07/2019	Photocopies B&W (7)	1.40
01/07/2019	Photocopies B&W (6)	1.20
01/07/2019	Photocopies B&W (4)	0.80
01/09/2019	Photocopies B&W (6)	1.20
01/14/2019	Photocopies B&W (1)	0.20
01/16/2019	Photocopies B&W (34)	6.80
01/16/2019	Photocopies B&W (147)	29.40
01/16/2019	Photocopies Color	21.00
01/16/2019	Photocopies B&W (8)	1.60
01/16/2019	Photocopies B&W (4)	0.80
01/16/2019	Photocopies B&W (22)	4.40
01/16/2019	Photocopies B&W (6)	1.20
01/16/2019	Photocopies B&W (12)	2.40
01/16/2019	Photocopies Color	4.20
01/16/2019	Photocopies B&W (6)	1.20
01/16/2019	Photocopies B&W (19)	3.80
01/18/2019	Photocopies B&W (3)	0.60
01/28/2019	Photocopies Color	21.00
01/28/2019	Photocopies B&W (22)	4.40
01/28/2019	Photocopies B&W (147)	29.40
01/28/2019	Photocopies B&W (4)	0.80
01/28/2019	Photocopies B&W (8)	1.60
01/28/2019	Photocopies B&W (12)	2.40

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01/28/2019	Photocopies Color	4.20
01/29/2019	Photocopies B&W (72)	14.40
01/29/2019	Photocopies B&W (12)	2.40
01/29/2019	Photocopies B&W (11)	2.20
01/29/2019	Photocopies B&W (230)	46.00
01/29/2019	Photocopies B&W (30)	6.00
01/29/2019	Photocopies B&W (218)	43.60
01/29/2019	Photocopies B&W (30)	6.00
01/29/2019	Photocopies B&W (38)	7.60
01/29/2019	Photocopies B&W (4)	0.80
01/29/2019	Photocopies B&W (32)	6.40
01/29/2019	Photocopies B&W (8)	1.60
01/29/2019	Photocopies B&W (12)	2.40
01/29/2019	Photocopies Color	1.05
01/29/2019	Photocopies B&W (39)	7.80
01/29/2019	Photocopies B&W (147)	29.40
	Total Disbursements	1,745.50

Payments

12/26/2018	Payment	City of Gold Bar	2,770.40
	Sub-total Payments:		\$2,770.40

Totals for this Matter

Prior Balance:	\$2,770.40
Payments Received:	\$2,770.40
Current Charges:	\$13,020.40
Balance Due:	\$13,020.40