

MIDDLETON REUTLINGER
A Professional Service Corporation
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Louisville, Kentucky 40202-3410
502.584.1135

Federal I.D. #61-0999942

June 20, 2016

Billing 6/30/2016

Invoice #ZU310 - 16001 - 229807 MSF

MR. TOMMY ELLIOTT
324 BROWNS LANE
LOUISVILLE, KY 40207

MRS. MARY HELEN PETER
18 PEMBROKE ROAD
LOUISVILLE, KY 40220

ELLIOTT, TOMMY AND PETER, MARY HELEN/KRS (KENTUCKY
RETIREMENT SERVICES)

RETAINER FOR SERVICES ASSOCIATED WITH SEEKING A
TEMPORARY RESTRAINING ORDER, HEARING ATTENDANCE AND
AMENDMENT OF COMPLAINT

\$10,000.00

FOR PROFESSIONAL SERVICES RENDERED

6/9/2016	MSF	ATTEND MEETING WITH CLIENT	2.00 hrs	\$275 /hr	\$550.00
6/9/2016	KLC	KRS - MEET WITH CLIENT TO DISCUSS INITIATING LAWSUIT; BEGIN REVIEW OF BACKGROUND DOCUMENTS FOR SUIT	2.20 hrs	\$260 /hr	\$572.00
6/9/2016	DLC	REVIEWED STATUTES, ATTORNEY GENERAL OPINIONS AND EXHIBITS TO PREPARE PLEADINGS	2.30 hrs	\$275 /hr	\$632.50
6/10/2016	MSF	ATTEND CONFERENCE CALL AND PREPARE COMPLAINT	2.00 hrs	\$275 /hr	\$550.00

6/10/2016	KLC	REVIEW AND ANALYZE STATUTES, OPINIONS, AND DRAFT COMPLAINT FOR CASE BACKGROUND ANALYSIS; DETERMINE QUESTIONS OF LAW TO ANALYZE IN DRAFTING COMPLAINT AND TRO; REVIEW AND ANALYZE KENTUCKY LAW INTERPRETING KRS 61.645; TELEPHONE CALL TO DISCUSS STANDING ISSUES	7.30	hrs	\$260 /hr	\$1,898.00
6/10/2016	DLC	DRAFTED REVISED COMPLAINT AND DECLARATION OF RIGHTS, RESEARCHED ISSUES FOR COMPLAINT	8.50	hrs	\$275 /hr	\$2,337.50
6/10/2016	DLC	REVIEWED WORKERS' COMP MATERIALS FOR DRAFTING INJUNCTIVE RELIEF MOTION	0.50	hrs	\$275 /hr	\$137.50
6/10/2016	DLC	REVIEWED STATUTORY LAW FOR MOTION FOR INJUNCTIVE RELIEF	1.00	hrs	\$275 /hr	\$275.00
6/10/2016	KTR	REVIEW AND ANALYZE STATUS OF CASE AND RELEVANT RESEARCH ISSUES; REVIEW ATTORNEY GENERAL OPINIONS; REVIEW FRANKLIN CIRCUIT COURT OPINION; REVIEW DRAFT OF COMPLAINT	2.20	hrs	\$195 /hr	\$429.00
6/11/2016	MSF	PHONE CALL WITH CLIENT AND WORK ON COMPLAINT	1.50	hrs	\$275 /hr	\$412.50
6/11/2016	KLC	REVIEW AND REVISE DRAFT VERIFIED COMPLAINT; REVIEW ANALYZE LAW GOVERNING POTENTIAL PLAINTIFFS' STANDING TO SUE, APPLICABLE FEE PAYMENT STATUTE, AND KRS. 61.645 ISSUES	6.90	hrs	\$260 /hr	\$1,794.00
6/11/2016	KTR	RESEARCH ALL CASES CITED BY THE ATTORNEY GENERAL AND JUDGE SHEPHERD; DRAFT MEMO	2.50	hrs	\$195 /hr	\$487.50
6/12/2016	KLC	COMPLETE STANDING LAW ANALYSIS; DRAFT WRITTEN ANALYSIS OF STANDING, FEE, AND KRS 61.645 ANALYSIS; EMAIL STATUS UPDATE; REVIEW BASIS FOR EX PARTE RESTRAINING ORDER	2.70	hrs	\$260 /hr	\$702.00

6/12/2016	DLC	TELEPHONE CALL WITH K. CHLARSON REGARDING STANDING ISSUE AND PREPARATION OF COMPLAINT AND MOTION FOR INJUNCTIVE RELIEF	0.50	hrs	\$275 /hr	\$137.50
6/12/2016	KTR	REVIEW DRAFT OF COMPLAINT; REVIEW MEMO FROM K. CHLARSON; REVIEW MOTIONS FILED IN SIMILAR PREVIOUS CASES FOR HELPFUL CASE LAW	1.80	hrs	\$195 /hr	\$351.00
6/13/2016	KLC	TELEPHONE CALL TO DISCUSS CURRENT MEETING STATUS ISSUES AND FEE STATUTE ISSUES; TELEPHONE CALL WITH T. ELLIOTT TO DISCUSS LAWSUIT STRATEGY AND ISSUES TO ADDRESS; CONTINUE DRAFT OF VERIFIED COMPLAINT AND PREPARING SUPPORTING DOCUMENTS	6.20	hrs	\$260 /hr	\$1,612.00
6/13/2016	DLC	TELEPHONE CONFERENCES WITH CLIENTS REGARDING FACTS OF CASE	2.00	hrs	\$275 /hr	\$550.00
6/13/2016	DLC	DRAFTED AFFIDAVIT OF MARY HELEN PETERS	1.50	hrs	\$275 /hr	\$412.50
6/13/2016	DLC	DRAFTED MOTION FOR TEMPORARY INJUNCTION	5.00	hrs	\$275 /hr	\$1,375.00
6/13/2016	MKR	MEET WITH K. CHLARSON AND D. COLLINS TO DISCUSS UPCOMING FILINGS AND CASE	0.20	hrs	\$130 /hr	\$26.00
6/13/2016	KTR	REVIEW MULTIPLE EXAMPLES OF COMPLAINTS AND MOTION FOR INJUNCTIVE RELIEF; MEETING WITH D. COLLINS TO DISCUSS OUTLINE OF MEMO IN SUPPORT OF MOTION FOR INJUNCTIVE RELIEF AND LEGAL ARGUMENTS FOR MOTION	0.90	hrs	\$195 /hr	\$175.50
6/13/2016	KTR	CONFERENCE WITH K. CHLARSON AND D. COLLINS TO DISCUSS CASE; TELECONFERENCE WITH TRUSTEE	0.80	hrs	\$195 /hr	\$156.00
6/13/2016	KTR	MEETING WITH K. CHLARSON AND D. COLLINS REGARDING STATUS; TELECONFERENCE WITH CLIENT REGARDING STRATEGY	1.90	hrs	\$195 /hr	\$370.50

6/14/2016	KLC	CONTINUE DRAFT OF VERIFIED COMPLAINT; TELEPHONE CALL REGARDING NEW ATTORNEY GENERAL OPINION REGARDING OPEN MEETING ISSUES; REVIEW AND ANALYZE AG OPINION AND KRS RESPONSE TO PUBLIC MEETING ISSUES;	5.10	hrs	\$260 /hr	\$1,326.00
6/14/2016	DLC	TELEPHONE CALLS WITH CLIENTS TO DISCUSS FACTS OF CASE AND POSSIBLE PARTICIPATION BY TRUSTEES AS PARTIES	1.00	hrs	\$275 /hr	\$275.00
6/14/2016	DLC	DRAFTED MOTION FOR TEMPORARY INJUNCTION	2.00	hrs	\$275 /hr	\$550.00
6/14/2016	DLC	REVISED VERIFIED COMPLAINT	0.50	hrs	\$275 /hr	\$137.50
6/14/2016	MKR	DOWNLOAD AND PREPARE DOCUMENTS RECEIVED FROM CLIENT FOR FILINGS	0.30	hrs	\$130 /hr	\$39.00
6/14/2016	KTR	CONFERENCE WITH K. CHLARSON REGARDING STATUS OF CLIENTS; REVIEW NEW ATTORNEY GENERAL OPINION ON VIOLATIONS OF OPEN MEETING; REVIEW DRAFT OF COMPLAINT; BEGIN RESEARCHING LEGAL ARGUMENTS FOR MOTION FOR INJUNCTIVE RELIEF	1.80	hrs	\$195 /hr	\$351.00
6/15/2016	KLC	TELEPHONE CALL AND EMAIL EXCHANGE WITH T. ELLIOTT TO DISCUSS LAWSUIT PREPARATION; REVIEW AND REVISE VERIFIED COMPLAINT; REVIEW AND REVISE M. PETER AFFIDAVIT FOR INJUNCTION MOTION; EXHCANGE EMAILS REGARDING LAWSUIT PREPARATION; PREPARE SUPPORTING DOCUMENTS TO BE SUBMITTED TO COURT WITH VERIFIED COMPLAINT	2.80	hrs	\$260 /hr	\$728.00
6/15/2016	DLC	DRAFTED MOTION FOR INJUNCTION, ORDER REGARDING SAME	3.60	hrs	\$275 /hr	\$990.00
6/15/2016	MKR	MEET WITH K. CHLARSON, D. COLLINS AND K. REIZ TO DISCUSS FILINGS AND EXHIBITS; READ COMPLAINT AND BEGIN TO IDENTIFY EXHIBITS	1.30	hrs	\$130 /hr	\$169.00

6/15/2016	KTR	DRAFT MEMO TO K. CHLARSON AND D. COLLINS REGARDING DOCUMENTS RELIED ON BY ATTORNEY GENERAL IN OPEN MEETINGS OPINIONS; CONFERENCE WITH K. CHLARSON REGARDING COMPLAINT AND STATUS OF CASE; REVIEW FIRST DRAFT OF MEMORANDUM IN SUPPORT OF INJUNCTION; BEGIN RESEARCHING AND INSERTING CASE LAW IN THE MEMORANDUM	3.40	hrs	\$195 /hr	\$663.00
6/16/2016	KLC	REVIEW AND REVISE MEMORANDUM IN SUPPORT OF INUNCTION; REVIEW AND REVISE VERIFIED COMPLAINT AND SUPPORTING MATERIALS; TELEPHONE CALL TO DISCUSS ADDITIONAL CASE BACKGROUND INFORMATION; REVIEW AND REVISE MOTION OR INJUNCTION AND PROPOSED ORDER	8.60	hrs	\$260 /hr	\$2,236.00
6/16/2016	DLC	REVISED AFFIDAVIT, TELEPHONE CALL WITH CLIENT REGARDING SAME	1.00	hrs	\$275 /hr	\$275.00
6/16/2016	DLC	DRAFTED MOTION FOR TEMPORARY INJUNCTION	2.00	hrs	\$275 /hr	\$550.00
6/16/2016	MKR	PHONE CALL TO FRANKLIN CIRCUIT COURT REGARDING FILING PROCEDURES; EMAILS TO AND FROM K. REIZ; DOWNLOAD CLIENT COPY OF EXHIBIT E; PREPARE COVERSHEETS FOR EXHIBITS A-L; PREPARE COPY FOR K. CHLARSON TABBED	2.30	hrs	\$130 /hr	\$299.00
6/16/2016	MKR	PREPARE EXHIBITS INCLUDING BIOGRAPHY	1.00	hrs	\$130 /hr	\$130.00
6/16/2016	MKR	PREPARE EXHIBIT D AND SEARCH KRS WEBSITE FOR MOST UPDATED VERSION	0.20	hrs	\$130 /hr	\$26.00
6/16/2016	MKR	PULL CASE LAW FOR MEMORANDUM	1.00	hrs	\$130 /hr	\$130.00

6/16/2016	KTR	FINISH RESEARCHING AND DRAFTING PORTION OF MEMO IN SUPPORT OF INJUNCTION; CONFERENCE WITH D. COLLINS REGARDING DRAFT; REVIEW NEW LETTER FROM THE STATE POLICE; CONFERENCE WITH K. CHLARSON REGARDING CLIENTS; REVIEW FINAL DRAFT OF COMPLAINT	3.60	hrs	\$195 /hr	\$702.00
6/17/2016	KLC	COMPLETE REVISIONS TO: VERIFIED COMPLAINT; MEMORANDUM IN SUPPORT OF MOTION TEMPORARY RESTRAINING, MOTION FOR TEMPORARY RESTRAINING ORDER, AND SUPPORTING DOCUMENTS; TELEPHONE CALLS WITH T. ELLIOTT TO DISCUSS STATUS OF FILING AND POST-FILING STRATEGIES; REVIEW MEDIA STRATEGY AND TALKING POINTS	8.20	hrs	\$260 /hr	\$2,132.00
6/17/2016	DLC	DRAFTED PRESS STATEMENTS FOR CLIENTS	0.70	hrs	\$275 /hr	\$192.50
6/17/2016	DLC	REVIEWED EXECUTIVE ORDERS REGARDING RETIREMENT AND UOFL BOARDS FOR FURTHER ACTION	0.50	hrs	\$275 /hr	\$137.50
6/17/2016	DLC	REVIEWED AND REVISED MOTION FOR TEMPORARY INJUNCTION, COMPILED EXHIBITS FOR SAME	3.00	hrs	\$275 /hr	\$825.00
6/17/2016	DLC	TELEPHONE CALLS WITH CLIENT REGARDING FILING OF SUIT	0.60	hrs	\$275 /hr	\$165.00
6/17/2016	MKR	MEETING WITH K. CHLARSON AND D. COLLINS TO DISCUSS STATUS OF FILING	0.20	hrs	\$130 /hr	\$26.00
6/17/2016	KTR	REVIEW FINAL MEMO IN SUPPORT OF TEMPORARY INJUNCTION; DRAFT MOTION FOR HEARING; CONFERENCE WITH K. CHLARSON REGARDING RESEARCH IN PREPARATION OF HEARING	1.60	hrs	\$195 /hr	\$312.00
6/17/2016	KTR	DRAFT MEMO ON TALKING POINTS TO MEDIA; DRAFT STATEMENT ON BEHALF OF CLIENTS; REVIEW VOICEMAIL FROM CLIENTS	0.80	hrs	\$195 /hr	\$156.00

6/17/2016	KTR	REVIEW NEWS ARTICLES ON BEVIN'S EXECUTIVE ORDER ON KENTUCKY RETIREMENT SYSTEM BOARD; RESEARCH AND PULL EXECUTIVE ORDER ON REASSIGNMENT OF WORKERS COMPENSATION BOARD; CONFERENCE WITH CLIENT REGARDING FURTHER	1.30 hrs	\$195 /hr	\$253.50
6/20/2016	MKR	OVERSEE ELECTRONIC FILING OF ALL DOCUMENTS AND EXHIBITS	1.00 hrs	\$130 /hr	\$130.00
6/20/2016	MKR	PREPARE EXHIBITS FOR MEMORANDUM FOR FILING; PHONE CALL TO FRANKLIN CLERK REGARDING SUMMONS	1.30 hrs	\$130 /hr	\$169.00
Total fees for this matter					<u>\$30,018.50</u>

BILLING SUMMARY

Collins, Dana L	(OF COUNSEL)	36.20 hrs	275.00 /hr	\$9,955.00
Chlarson, Kevin L.	(DIRECTOR)	50.00 hrs	260.00 /hr	\$13,000.00
Reisz, Katherine T	(ASSOCIATE)	22.60 hrs	195.00 /hr	\$4,407.00
Rennirt, Melissa K	(PARALEGAL)	8.80 hrs	130.00 /hr	\$1,144.00
Fenzel, Mark S.	(DIRECTOR)	5.50 hrs	275.00 /hr	\$1,512.50

TOTAL FEES	123.10 hr	\$30,018.50
TOTAL CHARGES FOR THIS BILL		<u>\$30,018.50</u>
RETAINER DUE		\$10,000.00
BALANCE DUE		<u>\$40,018.50</u>

OK to pay \$30,018.50
6/21/16
WAT