

The Supreme Court of South Carolina has set forth the factors to be considered in awarding attorney' fees. These factors include nature, extent, and difficulty of the legal services rendered; the time and labor necessarily devoted to the case; the professional standing of counsel; the contingency of compensation; the customary fees charged in the locality for similar services; and the beneficial result obtained. *Dede v. Stickland*, 414 S.E.2d 134 (S.C. 1992). Plaintiff's counsel secured the production of documents by Richland County on behalf of Wendy Brawley after several hearings with Judge Clifton Newman; a bench trial with Judge Benjamin; extensive discovery; and multiple pre- and post-trial motions and arguments. This matter was handled on a contingency basis by Shaun Blake and Jenkins Mann of Rogers, Lewis, Jackson, Mann & Quinn, LLC, who have practiced in the area of civil litigation since 2006. The attorney's fees submitted were based on the customary rate of \$300 per hour or more charged for legal services by firms in the Midlands. The complaint in this matter was filed on March 25, 2015, and approximately three hundred five (305) billable hours were devoted to this case. Upon review of these factors, this Court finds that the attorney's fees and costs requested are fair and reasonable in light of the nature of the legal services rendered.

Defendants allege that this Court lacks subject matter jurisdiction to award any such relief. First, Defendants argue that the February 13, 2020 Order of this Court required Plaintiff to submit a motion to support the amount of fees and costs incurred. Under South Carolina law, "the only prerequisite to an award of attorney's fees and cost is that the party seeking relief must prevail, in whole or in part." *Cockrell by Cockrell v. Trustees of Dist. 20 Constituent School Dist.*, 299 S.C. 155, 382 S.E.2d 923 (S.C. 1989). Thus, since Plaintiff prevailed on her request for declaratory relief, it is within this Courts discretion to award attorney's fees and costs to Plaintiffs. Furthermore, there is no prejudice to Defendant as a result of Plaintiff filing an

affidavit of attorney's fees rather than a motion. Plaintiff requested attorney's fees in its complaint and reasserted this request at trial.

Defendants also assert that by law Plaintiff's had ten (10) days after a final order on the merits to file a motion for attorney's fees and cost. On February 24, 2020, Defendant filed a motion to alter or amend the February 13, 2020 Order of this Court. This vested the Court with continuing jurisdiction over the case until a final order on the merits was issued and attorney's fees and costs determined. By Order filed July 16, 2020, this Court issued an Amended Order. Within ten (10) days, on July 27, 2020, Plaintiff filed an affidavit of attorney's fees and costs.

Defendant further alleges that Plaintiff's counsel expended some of the attorney's fees and cost in question representing a prior co-Plaintiff Hopkins and Lower Richland Citizens United, Inc. Upon review of Plaintiff's counsel billing records and itemized costs (**Exhibit A**) this Court finds that the fees and costs requested result from work done specifically on behalf of Plaintiff Wendy Brawley.

Pursuant to the South Carolina Freedom of Information Act (FOIA), S.C. Code Ann. §30-4-10, *et seq.*, Plaintiff is entitled to reasonable attorney's fees incurred herein. The Court held multiple hearings and considered the oral arguments of counsel. In addition, the Court reviewed the filings by counsel. Upon consideration, this Court finds that an award of attorney's fees and costs in the amount of \$81,264.96 are fair and reasonable.

IT IS SO ORDERED THAT

Plaintiff is awarded attorney's fees and costs in the amount of \$81,264.96. Within ninety (90) days of the date of this Order, Defendant shall pay to Plaintiff, the sum of \$81,264.96.

AND IT IS SO ORDERED.



The Honorable DeAndrea Gist Benjamin
Presiding Circuit Court Judge
Fifth Judicial Circuit

Columbia, South Carolina
November 25, 2020

Exhibit A

Rogers Lewis Jackson Mann & Quinn, LLC
 1901 Main Street, Suite 1200 Columbia, SC 29201

803-256-1268 EI N:46-1723523

Wendy Brawley/Hopkins and Lower Richland Citizens

INVOICE

Date Nov 2020
 Terms Net 30
 Service Thru Nov 2020
 Invoice No. 94144
 Matter # 13614

In Reference To: Lower Richland Water/Sewer

(Legal Services)

Date	By	Services	Hours	Rates	Amount
Mar-03-15	SB	Review public records, news releases, articles, and county files in preparation for client meeting; attend meeting with clients.	3.80	\$300.00	1,140.00
Mar-12-15	SB	Travel to Hopkins and attend meeting with clients and witnesses to discuss issues with the County and efforts to address the same.	3.20	\$300.00	960.00
Mar-12-15	JM	ATTEND MEETING WITH CLIENT AND WITNESSES IN PREPARATION FOR SUIT	3.20	\$300.00	960.00
Mar-13-15	SB	Emails from and to Wendy Brawley re: next steps.	0.40	\$300.00	120.00
Mar-16-15	SB	Emails from and to Wendy Brawley re: county council meeting.	0.30	\$300.00	90.00
Mar-17-15	SB	Review county council records and FOIA requests, as well as county responses, in anticipation of county council meeting; travel to County Council Meeting and attend with Ms. Brawley; meeting beforehand to discuss her intentions to ask to be heard by the County during the meeting.	1.80	\$300.00	540.00
Mar-18-15	JM	TELEPHONE CONFERENCE AND EMAILS WITH WENDY BRAWLEY RE: MEDIA AND COUNTY COUNCIL MEETING; DISCUSSION WITH MEDIA RE: SAME;	2.50	\$300.00	750.00
Mar-23-15	JM	PREPARE FOR MEETING WITH HELEN BRADLEY, PAUL AND WENDY BRAWLEY; MEET WITH SAME;	1.80	\$300.00	540.00

ELECTRONICALLY FILED - 2020 Nov 30 2:04 PM - RICHLAND - COMMON PLEAS - CASE#2015CP4001805

Mar-23-15	SB	Prepare for and attend meeting with officers of HLRCU re: proceeding with FOIA litigation.	2.00	\$300.00	600.00
Mar-23-15	SB	Telephone call from and conference with Cameo Green of HLRCU re: today's meeting on FOIA litigation.	0.10	\$300.00	30.00
Mar-23-15	SB	Communications and coordination with client re: allegations of the Complaint	1.20	\$300.00	360.00
Mar-25-15	JM	PREPARE CIVIL ACTION COVER SHEET, COVER LETTER AND EXHIBITS FOR FILING SUMMONS AND COMPLAINT; INSTRUCT RUNNER ON THE SAME	1.00	\$300.00	300.00
Mar-25-15	SB	Finalize draft and completion of Summons and Complaint.	1.80	\$300.00	540.00
Mar-26-15	MG	RESEARCH AND PHONE TO OMBUDMANS OFFICE AND TO CLERK OF COURT TO VERIFY WHO WILL ACCEPT SERVICE FOR RICHLAND COUNTY	0.40	\$105.00	42.00
Mar-26-15	MG	Review and organize documents for file; instruct runner to create physical file	0.10	\$105.00	10.50
Mar-26-15	SB	Email to client re: filed Complaint and discussion of service.	0.10	\$300.00	30.00
Mar-27-15	JM	CONFERENCE WITH SARAH ELLIS RE: ARTICLE ON DISAGREEMENT; EMAIL RE: SAME;	1.40	\$300.00	420.00
Mar-27-15	MG	CONFER WITH SHAUN AND TYLER ON SERVICE OF PROCESS	0.10	\$105.00	10.50
Mar-30-15	MG	INSTRUCT ON SERVICE ON FRIDAY; CALENDAR DATES ACCORDINGLY	0.10	\$105.00	10.50
Mar-30-15	SB	Receive email from Wendy Brawley and respond to same.	0.10	\$300.00	30.00
Apr-01-15	MG	REVIEW OF EMAIL CORRESPONDENCE; FORWARDED FILED SUMMONS AND COMPLAINT TO CHRIS TRAINOR	0.10	\$105.00	10.50
Apr-07-15	JM	TELEPHONE CALL FROM AND TO SARA MARTIN RE: LOWER RICHLAND SEWER PROJECT;	0.20	\$300.00	60.00
Apr-08-15	SB	Receive, evaluate and respond to email from	0.20	\$300.00	60.00
Apr-13-15	JM	RECEIVE AND REVIEW SURVEY; MEET WITH SHAUN BLAKE AND WES JACKSON RE: RESPONSE TO SURVEY; EMAILS WITH WENDY	0.50	\$300.00	150.00

Apr-13-15	MG	BRAWLEY RE: SAME AND PROCESS FOR INJUNCTION; CONFERENCE WITH COUNSEL RE SURVEY SENT BY RICHLAND COUNTY; NEEDS RE TEMPORARY INJUNCTION AND ADDITIONAL FOIAs	0.30	\$105.00	31.50
Apr-13-15	WJ	Meeting with Shaun and Jenkins regarding survey and response to survey and possible injunction	0.40	\$300.00	120.00
Apr-16-15	SB	Email from Wendy re: additional residents being refused record requests.	0.20	\$300.00	60.00
Apr-21-15	SB	Emails with Wendy re: April County council meeting	0.20	\$300.00	60.00
Apr-24-15	MG	DRAFTED AFFIDAVIT OF SERVICE FOR FILING	0.70	\$105.00	73.50
Apr-24-15	SB	Receive letter from A. Lindeman and follow-up emails with legal team re: service.	0.20	\$300.00	60.00
Apr-27-15	MG	FINALIZED AFFIDAVIT OF SERVICE;	0.30	\$105.00	31.50
Apr-28-15	AS	ASSIST WITH AFFIDAVIT OF SERVICE; NOTARIZE SAME	0.10	\$105.00	10.50
Apr-28-15	MG	REVIEW OF EMAIL CORRESPONDENCE RE RALLY AND COUNCIL MEETING; CALENDAR ACCORDINGLY; FINALIZED AOS FOR FILING	0.60	\$105.00	63.00
Apr-28-15	SB	Receive and evaluate letter from opposing counsel; internal emails with Jenkins and Mary re: affidavit of service.	0.20	\$300.00	60.00
Apr-30-15	MG	REVIEW OF EMAIL CORRESPONDENCE BETWEEN ATTORNEY AND CLIENT; CALENDAR ACCORDINGLY	0.10	\$105.00	10.50
May-01-15	JM	ANSWER AND MOTION TO DISMISS;	0.20	\$300.00	60.00
May-01-15	SB	Receive and evaluate answer and motion to dismiss from Andrew Lindemann.	0.20	\$300.00	60.00
May-04-15	JM	PREPARE AFFIDAVITS; MEET WITH WENDY BRAWLEY, PAUL BRAWLEY AND HELEN;	2.50	\$300.00	750.00
May-04-15	MG	CALENDAR UPCOMING COUNTY COUNCIL MEETING	0.10	\$105.00	10.50
May-04-15	SB	Receive and evaluate filed certificate of service.	0.10	\$300.00	30.00
May-04-15	SB	Meeting with Wendy Brawley and her husband, Paul Brawley to discuss	1.00	\$300.00	300.00

Invoice #	Date	Initials	Description	Hours	Rate	Amount
			case following Andrew Lindemann's appearance in the action.			
May-12-15	MG		Review of correspondence between Attorney and Client; calendar accordingly	0.10	\$105.00	10.50
May-18-15	JM		PREPARE AFFIDAVITS OF CITIZENS. ATTEND MEETING WITH SAME;	1.50	\$300.00	450.00
May-20-15	JM		TELEPHONE CALLS AND EMAILS WITH LEDONNA BEEKER;	0.40	\$300.00	120.00
May-20-15	SB		Emails with Wendy Brawley re: media outreach regarding action against Richland County.	0.20	\$300.00	60.00
May-22-15	SB		Prepare Motion for Preliminary Injunction; email to Wendy re: need for additional materials; follow up emails re: latest FOIA response; draft affidavit for Wendy Brawley; email to leadership of HLRU re: draft materials for filing.	1.80	\$300.00	540.00
May-28-15	SB		Emails with Wendy re: changes to her affidavit.	0.20	\$300.00	60.00
Jun-03-15	JM		RECEIVE DOCUMENTS AND REVIEW SAME IN RESPONSE TO USDA FOIA;	0.50	\$300.00	150.00
Jun-18-15	SB		Call to Wendy Brawley, left message.	0.10	\$300.00	30.00
Jun-19-15	MG		REVIEW OF CORRESPONDENCE BETWEEN ATTORNEY AND CLIENT; CALENDAR ACCORDINGLY	0.20	\$105.00	21.00
Jun-19-15	SB		Emails and coordination with client re: inspecting county records under discovery.	1.10	\$300.00	330.00
Jun-22-15	JM		TELEPHONE CONFERENCE WITH CLIENT RE: DISCOVERY DOCUMENTS;	1.10	\$300.00	330.00
Jun-24-15	JM		PREPARE DISCOVERY REQUESTS TO COUNTY; TELEPHONE CALL FROM ANDREW LINDEMANN;	1.50	\$300.00	450.00
Jun-24-15	MG		PREPARE WRITTEN SUPPORT DOCUMENTS FOR REQUEST TO PRODUCE; SAME SERVED	0.50	\$105.00	52.50
Jun-24-15	CB		Draft Requests to Produce to Defendant.	0.50	\$175.00	87.50
Jul-08-15	SB		Receive email from Jennifer Baker re: order of protection for Andrew Lindemann.	0.10	\$300.00	30.00
Jul-31-15	SB		Communicate and coordinate with Wendy re: efforts to get the records that Richland won't produce from USDA.	0.30	\$300.00	90.00

Invoice #	Date	Client	Description	Hours	Rate	Amount
Aug-05-15	SB		Receive email, letter, and memorandum from Andrew Lindemann.	0.30	\$300.00	90.00
Aug-10-15	JM		REVIEW FILE IN PREPARATION FOR HEARING; ATTEND SAME:	1.90	\$300.00	570.00
Aug-10-15	MG		REVIEW OF CALENDAR AND DISCOVERY REQUEST; CORRESPONDENCE WITH ATTORNEY RE THE SAME	0.20	\$105.00	21.00
Aug-10-15	MG		CORRESPONDENCE WITH ATTORNEY RE DISCOVERY REQUEST; DRAFT MOTION TO COMPEL WARNING LETTER TO OPPOSING COUNSEL; TO ATTORNEY FOR FURHTER REVIEW; SAME SERVED	0.20	\$105.00	21.00
Aug-12-15	SB		Receive, evaluate and respond to inquiry from Wendy re; status of discovery production, need for motion to compel, and purpose of Rule 11 consultation with opposing counsel.	0.50	\$300.00	150.00
Aug-13-15	JM		EMAILS WITH WENDY BRAWLEY RE: MOTION HEARING, MOTION TO COMPEL AND OTHER MATTERS;	0.50	\$300.00	150.00
Aug-25-15	JM		MOTION TO COMPEL AGAINST COUNTY;	0.80	\$300.00	240.00
Aug-25-15	MG		DRAFT MOTION TO COMPEL DISCOVERY AND OTHER WRITTEN SUPPORT DOCUMENTS; TO ATTORNEY FOR REVIEW; SAME SERVED	0.60	\$105.00	63.00
Nov-10-15	CB		Call with clerk of court re Motion to	0.20	\$175.00	35.00
Dec-11-15	SB		Receive and evaluate memorandum from Andrew Lindemann; emails to and from Wendy Brawley re: issues motion and plans for inspection.	0.80	\$300.00	240.00
Jan-25-16	JM		EMAIL FROM JENNIFER BAKER RE: COORDINATING INSPECTION; EMAILS WITH CLIENT BRAWLEY REGARDING THE SAME.	0.30	\$300.00	90.00
Jan-25-16	SB		Emails with Wendy Brawley re: inspection.	0.20	\$300.00	60.00
Feb-09-16	SB		Follow up to determine whether County has produced the copies of records marked during the inspection; communication with Wendy Brawley regarding the same.	0.20	\$300.00	60.00
Feb-10-16	WJ		On-site document review.	6.50	\$300.00	1,950.00

Invoice #	Date	Attorney	Description	Hours	Rate	Amount
Feb-29-16	WJ		Review documents. Email correspondence with Wendy regarding same.	0.60	\$300.00	180.00
Mar-01-16	SB		Draft proposed scheduling order; prepare correspondence to Andrew Lindemann re: question why we have not received the documents flagged during inspection, request for scheduling order to allow time for county to produce, depositions to be take, and mediation to	0.50	\$300.00	150.00
Mar-02-16	JM		TELEPHONE CONFERENCE WITH WENDY BRAWLEY, SHAUN BLAKE AND OTHERS RE: STATUS UPDATE;	1.40	\$300.00	420.00
Mar-09-16	JM		LETTER TO DHEC SUMMARIZING SUIT AGAINST COUNTY AND ENCLOSING COMMENT FROM CLIENT;	0.80	\$300.00	240.00
Mar-17-16	TK		prepare and finalize Scheduling Order, get check, finalize Ltr and COS	0.90	\$105.00	94.50
Mar-18-16	TK		prepare and finalize Scheduling Order, Ltr and COS	1.80	\$105.00	189.00
Apr-29-16	SB		Review file materials and prepare email to Wendy Brawley re Need for her to begin to organize issues with production in a manner for us to put in an affidavit; receive evaluate and respond to follow up from Ms. Brawley.	1.00	\$300.00	300.00
May-02-16	SB		Emails from and to Ms. Brawley re: her review of copies of documents made during inspection.	0.60	\$300.00	180.00
Jun-15-16	SB		Receive and evaluate letter and Motion for Summary Judgment from Andrew Lindemann.	0.40	\$300.00	120.00
Jul-01-16	SB		Receive email and letter from Andrew Lindemann's office.	0.10	\$300.00	30.00
Jul-05-16	JM		PREPARE LETTER TO CLIENT RE: MOTION FOR SUMMARY JUDGMENT AND NEED TO RESPOND TO THE SAME AND EXPECTATIONS FOR TRIAL.	0.40	\$300.00	120.00
Jul-12-16	SB		Conference with Jenkins Mann and teleconference with Andrew Lindemann re: trial.	0.50	\$300.00	150.00
Jul-13-16	SB		Receive and evaluate email and proposed consent order from Andrew Lindemann.	0.20	\$300.00	60.00
Jul-15-16	SB		Receive, evaluate and respond to email from Wendy Brawley re: long list of items that have been discovered following the County's production of records.	0.30	\$300.00	90.00

Invoice #	Date	Code	Description	Hours	Rate	Amount
Jul-19-16	SB		Receive and evaluate email and letter from Andrew Lindemann's office to Judge Benjamin.	0.10	\$300.00	30.00
Jul-19-16	SB		Emails with Wendy Brawley re: picking up records for trial.	0.20	\$300.00	60.00
Jul-19-16	SB		Receive email from Jennifer Baker forwarding message from Jasmine Wyman, Judge Benjamin's law clerk; follow-up emails regarding roster meeting.	0.40	\$300.00	120.00
Jul-20-16	SB		Receive email from Judge Benjamin's office requesting attendance at roster meeting; notice to client regarding the same.	0.10	\$300.00	30.00
Jul-22-16	JM		CALL TO ANDREW LINDEMANN; CONFERENCE WITH SHAUN BLAKE RE: TRIAL;	0.50	\$300.00	150.00
Jul-22-16	SB		Conference call with Andrew Lindemann re: case issues; meeting with Jenkins to discuss how to proceed with case.	0.50	\$300.00	150.00
Jul-25-16	JM		ROSTER MEETING; EMAILS, Other MATTERS;	1.50	\$300.00	450.00
Jul-25-16	SB		Travel to and from and attend roster meeting.	0.70	\$300.00	210.00
Jul-29-16	TK		prepare and finalize Notice of Hearing, Correspondence with Shaun Blake re Notice of Hearing	0.30	\$105.00	31.50
Aug-17-16	TK		Review and print records in file for WJ and JM review. Organize file	1.10	\$105.00	115.50
Aug-17-16	SB		Receive and evaluate letter and affidavit from Andrew Lindemann re: affidavit of Judy Carter; receive email and memorandum of law from Andrew Lindemann re: motion for summary judgment; meeting with litigation team to discuss response and affidavit of Wendy Brawley.	0.80	\$300.00	240.00
Aug-18-16	JM		PREPARE AFFIDAVIT OF WENDY BRAWLEY; EMAIL TO WENDY BRAWLEY RE: SAME;	2.40	\$300.00	720.00
Aug-18-16	TK		prepare and finalize Affidavit of J Brawley, Prepare Ltr to court for Filing, Scan and Save to our file	0.60	\$105.00	63.00
Aug-18-16	CB		Travel to and from W Brawley's Office; notarize Affidavit; prepare same for filing; attempt to file same.	1.50	\$175.00	262.50
Aug-19-16	SB		Receive and evaluate email from Andrew Lindeman re: affidavit of Wendy Brawley; instruction to litigation team regarding the same.	0.20	\$300.00	60.00

Invoice #	Date	Client	Description	Hours	Rate	Amount
Aug-21-16	WJ		Prepare for Summary Judgment hearing tomorrow.	6.70	\$300.00	2,010.00
Aug-21-16	SB		Meeting with Wes Jackson to assist him in preparing for oral argument on Motion for Summary Judgment.	1.40	\$300.00	420.00
Aug-22-16	WJ		Continue preparation for Summary Judgment. Attend and argue summary judgment. Office conference with partners regarding same. Update client regarding outcome of same	2.70	\$300.00	810.00
Aug-22-16	TK		Receive and catalog correspondence from W Brawley and JM SB	0.40	\$105.00	42.00
Aug-22-16	CB		Confer with W Brawley re: hearing.	0.10	\$175.00	17.50
Aug-23-16	SB		Email from Andrew Lindemann re: proposed order addressing the Motion to Dismiss heard by Judge Clifton Newman previously; evaluate order and email to Andrew regarding the same.	0.40	\$300.00	120.00
Aug-23-16	SB		Finalize assisting Wes in preparing for oral argument today; receive update from hearing and prepare written correspondence updating Ms. Brawley on results of the motion and the affect on this litigation, the need for mediation, and the goal of trial.	2.00	\$300.00	600.00
Aug-24-16	SB		Receive and review Defendant's Notice of Motion to transfer case to Non-Jury Docket.	0.10	\$300.00	30.00
Aug-25-16	SB		Emails from Jazmon Kearse, law clerk to Judge Newman and Andrew Lindemann.	0.10	\$300.00	30.00
Aug-26-16	SB		Receive, evaluate and respond to email from client re: Summary Judgment hearing.	0.20	\$300.00	60.00
Aug-26-16	SB		Conference call with Wendy Brawley re: options for case and recommendations; emails following teleconference with Ms. Brawley regarding the same.	1.30	\$300.00	390.00
Aug-26-16	CB		Receive and review filed Affidavit of W. Brawley.	0.10	\$175.00	17.50
Aug-31-16	TK		Catalogue and Calendar dates from the Court	0.30	\$105.00	31.50
Sep-07-16	JM		EMAILS WITH ANDREW LINDEMANN RE: DEPOSITIONS.	0.20	\$300.00	60.00
Sep-07-16	TK		Correspondence with Opposing counsel, Telephone call with Paralegal J Baker regarding availability of opposing counsel, follow up w/ j baker after error in dates available	1.00	\$105.00	105.00

Invoice #	Date	Initials	Description	Hours	Rate	Amount
Sep-07-16		SB	Prepare correspondence to Jennifer Baker and Andrew Lindmann re: 30(b)(6) topics.	0.40	\$300.00	120.00
Sep-08-16		JM	TELEPHONE CONFERENCE WITH WENDY BRAWLEY AND OTHER RE: MOTION FOR SUMMARY JUDGMENT AND UPCOMING MEDIATION;	1.20	\$300.00	360.0
Sep-09-16		TK	Follow Up with Opposing counsel regarding dates for Depositions and Mediation	0.40	\$105.00	42.00
Sep-20-16		SB	Receive and review Order denying Motion for Summary Judgment.	0.10	\$300.00	30.00
Sep-23-16		JM	EMAILS WITH ANDREW RE: NEED TO DISCUSS DISCOVERY AND MEDIATION.	0.20	\$300.00	60.00
Sep-26-16		JM	MEDIATION EMAILS AND PHONE CALLS (WENDY AND LINDEMANN);	0.80	\$300.00	240.00
Sep-26-16		TK	Correspondence with Opp counsel regarding Continuation of Trial	0.20	\$105.00	21.00
Sep-26-16		SB	Conference call with Andrew Lindemann; receive email and proposed letter to Judge from Andrew following call.	0.30	\$300.00	90.00
Sep-28-16		TK	Catalog Correspondence from Court	0.10	\$105.00	10.50
Sep-28-16		SB	Receive email from Jennifer Baker enclosing letter to Judge Benjamin.	0.10	\$300.00	30.00
Sep-30-16		JM	RECEIVE, EVALUATE, AND RESPOND TO EMAIL FROM JENNIFER BAKER RE:PROPOSED ORDER PER JUDGE BENJAMIN'S REQUEST	0.20	\$300.00	60.00
Oct-06-16		TK	Receive and Catalog Correspondence From opposing counsel regarding Proposed Order	0.20	\$105.00	21.00
Oct-06-16		SB	Emails with Andrew Lindemann and Judge Newman's chambers re: Motion for Summary Judgment.	0.50	\$300.00	150.00
Oct-10-16		JM	PREPARE FOR HEARING ON NON-JURY TRANSFER; MOTION HEARING ON SAME	3.50	\$300.00	1,050.00
Oct-10-16		TK	Receive and Catalog Correspondence and Motion/Order from Opposing Counsel	0.60	\$105.00	63.00
Oct-13-16		TK	Receive and catalog filed documents received from the court, Correspondence with client and Attorney regarding the filed documents	0.50	\$105.00	52.50

Invoice	Date	Case	Description	Hours	Rate	Amount
Oct-18-16	WJ		Work on affidavit for Ms. Brawley. Email correspondence with Tyler and Ms. Brawley regarding same.	0.80	\$300.00	240.00
Oct-20-16	SB		Receive, evaluate and respond to emails from Wendy Brawley asking for update.	0.30	\$300.00	90.00
Oct-25-16	SB		Prepare letter to Wendy re: expectations of mediation.	0.50	\$300.00	150.00
Oct-28-16	TK		receive and catalog documents from court, email correspondence with Client regarding date for trial	0.40	\$105.00	42.00
Nov-02-16	TK		Correspondence with Multiple mediators regarding availability, send to opposing counsel for confirmation	0.80	\$105.00	84.00
Nov-03-16	TK		Correspondence with opposing counsel and client regarding mediation and confirmation	0.80	\$105.00	84.00
Nov-03-16	SB		Email from Jazmon Kearse in Judge Newman's chambers.	0.10	\$300.00	30.00
Nov-04-16	TK		Correspondence with Client and opposing counsel regarding mediation location	0.40	\$105.00	42.00
Nov-04-16	SB		Correspondence with Wendy Brawley re: choice of mediators, calendar conflicts of those previously recommended, and issues for mediation itself.	0.40	\$300.00	120.00
Nov-06-16	SB		Receive, evaluate and respond to email from Mrs. Brawley.	0.20	\$300.00	60.00
Nov-07-16	TK		Correspondence with Mediator T. Lydons Office to set Mediation, Correspondence with Opposing counsel and Client to confirm	1.40	\$105.00	147.00
Nov-14-16	JM		PREPARE FOR MEDITATION; MEDIATE CASE; PREPARE SETTLEMENT DOCUMENTS;	8.90	\$300.00	2,670.00
Nov-14-16	SB		Meet with Wendy to prepare for mediation; travel to and from and conduct mediation; perform exhibit analysis to application for federal assistance; draft proposed Affidavit for signature by the county to resolve litigation.	10.10	\$300.00	3,030.00
Nov-15-16	SB		Emails with Wendy re: time sensitivity of approving the affidavit in lieu of trial.	0.20	\$300.00	60.00
Nov-16-16	JM		REVISE AFFIDAVIT FOR SETTLEMENT; EMAILS WITH WENDY BRAWLEY RE: SAME; EMAILS WITH ANDREW LINDEMANN RE: SAME;	3.00	\$300.00	900.00
Nov-16-16	SB		Emails with Wendy re: concerns re: costs payment by the County in lieu of trial.	0.30	\$300.00	90.00

Invoice #	Date	Initials	Description	Hours	Rate	Amount
Nov-18-16		JM	EMAILS WITH ANDREW LINDEMANN RE: SETTLEMENT POSITION; EMAIL TO COURT RE: CONTINUANCE AND STATUS CONFERENCE; PREPARE MOTION FOR CONTINUANCE;	1.50	\$300.00	450.00
Nov-18-16		TK	Draft and Prepare Motion for Continuance for filing with court, correspondence with Opposing counsel regarding Motion	1.20	\$105.00	126.00
Nov-21-16		TK	Finalize and File Motion for Continuation with court, Send to Opposing counsel	0.80	\$105.00	84.00
Nov-21-16		TK	Receive and Catalog Correspondence from Judge Benjamins Law Clerk	0.20	\$105.00	21.00
Nov-22-16		JM	EMAILS WITH MEDIATOR RE: ATTEMPTING TO RESOLVE DISPUTE AND AGREE UPON AFFIDAVIT IN LIEU OF TRIAL	0.20	\$300.00	60.00
Dec-09-16		TK	Receive and Catalog Correspondence from Court Regarding Trial, Calendar Dates and Send to Client, UPDATE New docs from Court re New Date and Time for Trial, Update Client update calendar	0.80	\$105.00	84.00
Dec-21-16		TK	Phone Conference with Non-Jury coordinator regarding date for trial	0.30	\$105.00	31.50
Dec-26-16		SB	Emails with Tommy Lydon re: efforts to get the case settled instead of trial.	0.20	\$300.00	60.00
Dec-27-16		JM	CALL WITH TOMMY LYDON RE: SETTLEMENT;	0.50	\$300.00	150.00
Dec-27-16		TK	Draft, Prepare, and Finalize trial subpoenas for Witnesses, send to attorney for final review	2.00	\$105.00	210.00
Dec-27-16		SB	Conduct conference call with Tommy Lydon as mediator for cas; follow-up emails regarding the same with Tommy; review file and instructions to staff re: issuance of trial subpoenas to witnesses I have designated.	0.90	\$300.00	270.00
Dec-28-16		TK	Draft Trial Subpoenas, Send to Attorney for Approval, Call with Client regarding subpoenas	1.50	\$105.00	157.50
Dec-29-16		TK	Correspondence with Client and CIA regarding Service of Subpoenas	0.30	\$105.00	31.50
Dec-30-16		JM	TELEPHONE CONFERENCE WITH ANDREW LINDEMANN RE: POSSIBLE RESOLUTION;	0.50	\$300.00	150.00
Jan-03-17		JM	PREPARE MOTION FOR CONTINUANCE; PREP CLIENT FOR POSSIBLE TRIAL; CONFERENCE WITH ANDREW LINDEMANN;	2.30	\$300.00	690.00

Invoice #	Date	Time	Description	Rate	Amount	Balance
Jan-03-17	TK		Receive and Catalog Correspondence from Process Server regarding Service of Subpoenas to Two individuals	0.20	\$105.00	21.00
Jan-03-17	TK		Prepare and Finalize Joint Motions, Send to Attorney for Review,	1.20	\$105.00	126.00
Jan-03-17	SB		Receive voice message from Andy Metts regarding unavailability for trial; instruction to staff regarding the same; determine status of service on Sara Salley and Judy Carter; review and revise letter to Judge Newman re: trial and the unavailability of witnesses.	0.60	\$300.00	180.00
Jan-04-17	JM		EMAILS WITH CLIENT RE: CONTINUANCE OF TRIAL.	0.20	\$300.00	60.00
Jan-12-17	JM		EMAILS WITH CLIENT RE: RESPONDING TO UPDATE ON RESCHEDULING OF TRIAL.	0.20	\$300.00	60.00
Mar-02-17	JM		STATUS UPDATE WITH CLIENT VIA EMAIL RE: TRIAL DATE; INSTRUCTIONS TO STAFF RE: FOLLOW-UP WITH THE COURT.	0.20	\$300.00	60.00
Jun-13-17	JM		RECEIVE ROSTER NOTICE; INSTRUCTION TO STAFF RE: PLACING WITNESSES BACK UNDER TRIAL SUBPOENA.	0.40	\$300.00	120.00
Jul-06-17	SB		Receive update on call between Jenkins Mann and Andrew Lindemann; draft letter, proposed order and motion for continuance; email to Andrew Lindemann re: objecting to using Rep. Brawley's official title in court documents; respond to the same; email to Judge Manning and Ms. Henley.	1.10	\$300.00	330.00
Jul-07-17	JM		EMAIL FROM ANDREW LINDEMANN; CALL WITH JUDGE'S CHAMBERS; EMAIL TO LINDEMANN RE: APPROVAL OF CONTINUANCE; EMAILS WITH ANDREW RE; GETTING DATE CERTAIN FROM JUDGE MANNING IF POSSIBLE.	0.60	\$300.00	180.00
Jul-07-17	SB		Receive, evaluate and respond to email from Andrew Lindemann.	0.20	\$300.00	60.00
Jul-09-17	JM		RECEIVE, EVALUATE AND RESPOND TO EMAIL FROM ANDREW RE: INABILITY TO ATTEND ROSTER MEETING TOMORROW.	0.20	\$300.00	60.00
Jul-19-17	SB		Receive and evaluate email from Jennifer Baker re: order of protection.	0.10	\$300.00	30.00

Invoice #	Date	Initials	Description	Hours	Rate	Amount
Sep-12-17	TK		Receive and Catalog Notice from the Court regarding Trial Date, Calendar deadline dates, Prepare Email Correspondence to client regarding trial dates and availability.	0.60	\$105.00	63.00
Sep-12-17	SB		Receive roster notice; instructions to staff re: lining up client for trial.	0.20	\$300.00	60.00
Sep-28-17	TK		Review file, Prepare Motion for Continuance, send to attorney for review	0.80	\$105.00	84.00
Oct-02-17	JM		INSTRUCTIONS TO STAFF RE: REQUIREMENTS FOR MOTION FOR CONTINUANCE.	0.20	\$300.00	60.00
Oct-02-17	TK		Prepare and finalize Motion for Continuance for filing, Order, Ltr and Service documents Service of Docs on all parties	1.20	\$105.00	126.00
Oct-04-17	JM		PREPARE WRITTEN LETTER TO CLIENT RE: TRIAL	0.30	\$300.00	90.00
Oct-05-17	TK		Receive and Catalog Correspondence from the Court Re New Trial Date, Calendar Deadlines and Roster Meeting	0.20	\$105.00	21.00
Oct-09-17	TK		Prepare and finalize Trial subpoenas, Receive and Catalog Correspondence from Process Server re Service of documents on Parties, Receive and catalog Correspondence from Process server confirming service	1.20	\$105.00	126.00
Oct-20-17	JM		EMAILS WITH ANDREW RE: BACKUP DOCKET AND PROPOSAL TO TRY THE CASE ON WEDNESDAY DURING THE TERM.	0.40	\$300.00	120.00
Oct-24-17	TK		Receive and Catalog Affidavits of Service, File Affidavits with the clerk	0.40	\$105.00	42.00
Oct-25-17	TK		Review and Prepare file for Meeting with Client, Trial Prep	1.00	\$105.00	105.00
Oct-26-17	TK		prepare and Finalize Subpoena to sparty Hammett	0.60	\$105.00	63.00
Oct-26-17	TK		Receive and Catalog Correspondence from Client re Subpoena instructions	0.10	\$105.00	10.50
Oct-26-17	SB		Meeting with client re: trial; instructions to Tyler Koester re; additional subpoena needed for trial to ensure Sparty Hammett can attend.	1.00	\$300.00	300.00
Oct-30-17	SB		Travel to and from and attend roster meeting.	0.80	\$300.00	240.00
Nov-14-17	JM		EMAILS WITH CLIENT RE: MISTAKEN REPRESENTATIONS BY COUNTY	0.40	\$300.00	120.00

Invoice #	Date	Initials	Description	Hours	Rate	Amount
			OFFICIALS THAT THE LAWSUIT IS NOT STILL GOING FORWARD.			
Apr-14-18	JM		RECEIVE, EVALUATE AND RESPOND TO EMAIL FROM WENDY BRAWLEY RE; UPDATE ON TRIAL DATE.	0.20	\$300.00	60.00
Apr-16-18	TK		Receive and Catalog Correspondence with Court and Client re upcoming Trial dates	0.40	\$105.00	42.00
Apr-17-18	TK		Prepare, draft, and finalize Trial Subpoenas to three witnesses, Service of Subpoenas, corr with Process Server re Rush Service	1.60	\$105.00	168.00
Apr-17-18	SB		Receive roster notice; instructions to staff re: re-issuance of trial subpoenas in advance of roster meeting.	0.30	\$300.00	90.00
Apr-19-18	TK		Receive and Catalog Correspondence from Process Server re Service of All subpoenas on Witnesses, Meet with attorneys to discuss the same	0.80	\$105.00	84.00
Apr-19-18	SB		Receive, evaluate and respond to emails from Andrew re: trial date and conflicts; email with Paul Gunter re: trial date and conflicts and asking for a date certain trial date due to legislative conflicts with Judge Brawley.	0.80	\$300.00	240.00
Apr-20-18	JM		EMAILS WITH ANDREW LINDEMANN RE: ROSTER MEETING AND TRIAL OF CASE; ROSTER MEETING;	1.50	\$300.00	450.00
Apr-20-18	JM		EMAIL TO ANDREW RE: FOLLOWING UP ON JUDGE HOOD'S REQUEST FOR DATES FOR A DATE CERTAIN ORDER.	0.20	\$300.00	60.00
Apr-20-18	TK		Telephone conference with Witness Salley re Trial Dates,	0.20	\$105.00	21.00
Apr-26-18	TK		Receive and Catalog Affidavits of Service and Invoices for three Trial Subpoenas served, prepare invoice(s) for payment	0.60	\$105.00	63.00
Jun-25-18	TK		Receive and Catalog Notice of Trial date from court, Correspondence with client regarding availability.	1.00	\$105.00	105.00
Jul-05-18	TK		Prepare and Finalize Three Trial Subpoenas for service on the named individuals, Correspondence with Process Server regarding the same	1.40	\$105.00	147.00
Jul-05-18	SB		Coordination with staff on having trial subpoenas served on witnesses.	0.10	\$300.00	30.00
Jul-05-18	CB		Execute trial subpoenas.	0.10	\$175.00	17.50
Jul-10-18	TK		Begin Trial prep work with File, Confirm service of subpoenas with Process Server	1.40	\$105.00	147.00

Invoice #	Date	Case	Description	Hours	Rate	Amount
Jul-12-18	TK		Prepare file and docs for trial prep	1.60	\$105.00	168.00
Jul-19-18	JM		TRIAL PREP; COMMUNICATIONS WITH ANDREW LINDEMANN RE:	1.00	\$300.00	300.00
Jul-20-18	JM		COMMUNICATIONS FROM AND TO WENDY BRAWLEY RE: TRIAL.	0.50	\$300.00	150.00
Jul-20-18	SB		Receive email from Jennifer Baker re: Andy Metis' availability for date certain.	0.10	\$300.00	30.00
Jul-20-18	CB		Phone call wi Andy Metis re: upcoming trial.	0.10	\$175.00	17.50
Jul-21-18	JM		RECEIVE, EVALUATE AND RESPOND TO EMAILS FROM ANDREW LINDEMANN RE: TRIAL CONFLICTS FOR WITNESSES.	0.40	\$300.00	120.00
Jul-23-18	TK		Receive, upload, and catalog Affidavits of Service and Invoices for service of trial subpoenas, Prepare invoices for payment	0.90	\$105.00	94.50
Jul-23-18	TK		Call with Witness Salley re confirmed New trial date and time	0.30	\$105.00	31.50
Jul-23-18	SB		Travel to and attend status conference with Judge Hood; advise client that case is now set for a date certain on September 6, 2018.	0.80	\$300.00	240.00
Aug-03-18	SB		Instructions to staff re: serving trial subpoenas by August 20, 2018.	0.10	\$300.00	30.00
Aug-20-18	TK		Prepare update and Finalize Trial Subpoenas, Send to Process Server for Service on all Witnesses	1.30	\$105.00	136.50
Aug-24-18	TK		Receive and Catalog Service updates on all trial subpoenas, send update to attorneys	0.40	\$105.00	42.00
Aug-24-18	SB		Follow-up with Tyler to confirm service of trial subpoenas; confirm service.	0.10	\$300.00	30.00
Aug-27-18	TK		Receive and Catalog Affidavit of Service and invoices Regarding service of subpoenas	0.30	\$105.00	31.50
Aug-28-18	TK		Receive and Catalog Correspondence to client re Meeting to review file	0.20	\$105.00	21.00
Sep-04-18	TK		Receive and Catalog Remaining affidavits of Service received today, Call with Clerk of Court Regarding trial date, Call with client regarding trial date moved.	0.20	\$105.00	21.00
Sep-04-18	SB		Telephone call with Witness re update on trial date			
Sep-04-18	SB		Receive, evaluate and respond to email from Andrew Lindemann re: whether trial is proceeding; email from Andrew to Judge Hood's chambers regarding the	0.40	\$300.00	120.00

		date certain and whether the court has rescheduled for some reason; instructions to staff to notify witnesses that trial is not going forward asap.			
Sep-05-18	TK	Telephone conference with client regarding trial moved, call with clerk to confirm the same, Telephoen call with witnesses to confirm new trial date and time, Follow up with client regarding the same	0.80	\$105.00	84.00
Oct-09-18	JM	REVIEW DRAFT OF MOTION FOR CONTINUANCE FROM TYLER KOESTER; PROVIDE INSTRUCTIONS FOR REVISIONS BEFORE FILING.	0.20	\$300.00	60.00
Oct-09-18	TK	Draft, Edit, Finalize, and File Motion for Continuance per Attorney	2.00	\$105.00	210.00
Oct-10-18	SB	Instructions to associate Boguski for status conference.	0.10	\$300.00	30.00
Oct-16-18	JM	PREPARE CORRESPONDENCE TO CATHERINE IN JUDGE HOOD'S OFFICE RE: REQUEST FOR CONTINUANCE BY CONSENT; FOLLOW UP EMAILS REGARDING THE SAME.	0.40	\$300.00	120.00
Oct-17-18	SB	Receive order executed by Judge Hood and ensure case continuance; notice to client regarding the same.	0.20	\$300.00	60.00
Nov-16-18	TK	Prepare, update, finalize Subpoenas to witnesses. Correspondence with Process Server regarding service of the same	1.20	\$105.00	126.00
Nov-27-18	TK	Receive, upload, and catalog Affidavit of Service and invoices for service of Trial Subpoenas, Prepare AOS on all three subpoenas for filing with court	0.30	\$105.00	31.50
Dec-03-18	JM	EMAILS WITH ANDREW LINDEMANN RE: TRIAL DATES.	0.30	\$300.00	90.00
Dec-05-18	JM	CONDUCT CONFERENCE CALL WITH CLIENT AND ATTORNEY BLAKE; FOLLOW UP EMAILS WITH REP. BRAWLEY TO DETERMINE JANUARY TRIAL DATES.	0.70	\$300.00	210.00
Dec-05-18	SB	Status update and call with client re: how to proceed with case.	0.50	\$300.00	150.00
Feb-13-19	JM	RECEIVE EMAIL FROM LAST EVENING FROM ANDREW LINDEMANN; COORDINATE VIA EMAIL WITH ANDREW, CLIENT, AND LITIGATION TEAM FOR TRIAL DATE.	0.80	\$300.00	240.00

Invoice #	Date	Attorney	Description	Hours	Rate	Amount
Feb-15-19	JM		RECEIVE AND RESPOND TO EMAILS FROM ANDREW RE: TRIAL WITNESSES.	0.30	\$300.00	90.00
Feb-19-19	JM		EMAILS WITH ANDREW, JUDGE NEWMAN'S CHAMBERS, AND CLIENT RE: SCHEDULING OF TRIAL	0.70	\$300.00	210.00
Feb-20-19	JM		RECEIVE, EVALUATE AND RESPOND TO CLIENT QUESTIONS VIA EMAIL.	0.30	\$300.00	90.00
Mar-18-19	SB		Emails to and from Andrew Lindemann re: upcoming trial date and witness availability; emails with client regarding trial.	0.70	\$300.00	210.00
Mar-20-19	JM		PREPARE EMAIL TO PAUL GUNTER ASKING FOR TRIAL DATE NEXT FRIDAY.	0.10	\$300.00	30.00
Mar-21-19	SB		Receive email from Andrew Lindemann confirming Judy Carter's availability for March 29.	0.10	\$300.00	30.00
Mar-25-19	SB		Travel to and attend roster meeting; receive notice of the court's intention to move trial to summertime; advise client of the court's decision; email to Andrew Lindemann advising of the same; receive emails from client re: summer availability; receive email from Andrew Lindemann re: roster.	1.20	\$300.00	360.00
Jun-24-19	JM		RECEIVE ROSTER NOTICE; EMAIL TO ANDREW RE: AVAILABILITY OF LAWYERS AND WITNESSES FOR TRIAL WEEK OF JULY 15.	0.20	\$300.00	60.00
Jun-24-19	SB		Receive court roster and internal conference re: trial.	0.20	\$300.00	60.00
Jun-28-19	JM		RECEIVE, EVALUATE AND RESPOND TO EMAIL FROM ANDREW LINDEMANN AND INSTRUCTIONS TO STAFF.	0.30	\$300.00	90.00
Jul-09-19	JM		RECEIVE AND EVALUATE EMAIL FROM ANDREW LINDEMANN RE: WITNESSES AND NEED FOR PROTECTIVE ORDER; PREPARE RESPONSIVE COMMUNICATION; RECEIVE COURT FILINGS FROM ANDREW LINDEMANN.	0.30	\$300.00	90.00
Jul-11-19	JM		EMAILS WITH REP. BRAWLEY RE; TRIAL DATE.	0.20	\$300.00	60.00
Jul-12-19	JM		RECEIVE, EVALUATE AND RESPOND TO EMAILS FROM ANDREW LINDEMANN.	0.20	\$300.00	60.00
Jul-15-19	JM		FOLLOW-UP EMAILS TO CLIENT DISCUSSING THE REASONS TRIAL	0.30	\$300.00	90.00

Invoice #	Date	Attorney	Description	Hours	Rate	Amount
			GOT MOVED AND CHECKING ON AVAILABILITY FOR WEEK OF AUGUST 12.			
Jul-17-19	SB		Emails with Andrew re: Judge Newman's request for motions of continuance in lieu of motions for protective orders.	0.20	\$300.00	60.00
Aug-02-19	SB		Receive email from Andrew Lindemann; draft and prepare motion for continuance and file the same.	0.50	\$300.00	150.00
Aug-05-19	SB		Receive order from Judge Newman entering continuance.	0.10	\$300.00	30.00
Aug-15-19	JM		RECEIVE, EVALUATE AND RESPOND TO EMAILS FROM CLIENT ABOUT TRIAL DATE; ADVISE OF NEW TRIAL DATE OF SEPTEMBER 3; CONFIRM AVAILABILITY WITH CLIENT.	0.40	\$300.00	120.00
Aug-29-19	JM		EMAILS WITH ANDREW LINDEMANN RE: WITNESS AVAILABILITY FOR TRIAL THE LATTER HALF OF THE TERM.	0.20	\$300.00	60.00
Aug-29-19	SB		Receive, evaluate and respond to email from A. Lindemann re: trial the latter half of the week and confirming my availability.	0.20	\$300.00	60.00
Sep-03-19	JM		ATTEND ROSTER MEETING; CORRESPONDENCE WITH WITNESSES AND CLIENTS RE: SAME; REVIEW TRIAL BRIEF FROM ANDREW LINDEMANN; EMAILS WITH ANDREW LINDEMANN; PRELIMINARY TRIAL PREPARATION;	2.20	\$300.00	660.00
Sep-03-19	CKR		Receiving Defendant's pre-trial brief forward for Attorney review.	0.10	\$105.00	10.50
Sep-03-19	SB		Emails with the court and opposing counsel re: preparing for trial this week; receive trial brief from Andrew Lindemann; division of duties in trial prep with litigation team; begin review of records and instructions to staff re: beginning to copy exhibits; begin preparation of caselaw and materials that will be needed to address statements, arguments, and motions during trial.	6.80	\$300.00	2,040.00
Sep-04-19	JM		PREPARE TRIAL BRIEF; PREPARE FOR TRIAL; TELEPHONE CONFERENCE WITH WITNESSES IN PREPARATION FOR TRIAL;	9.70	\$330.00	3,201.00
Sep-04-19	CKR		Electronically file Trial Brief per Attorney's instructions.	0.50	\$105.00	52.50

Invoice #	Date	Description	Hours	Rate	Amount
Sep-04-19	DC	prepare documents for Attorney review; pre trial prep	0.70	\$105.00	73.50
Sep-04-19	DC	prepare documents for trial	0.70	\$105.00	73.50
Sep-04-19	SB	Meet with client re: preparation of trial testimony; revise and provide input on trial brief; continued review of file materials; instruction and oversight of document and exhibit preparation with staff; outline examinations of witnesses for trial and organize trial	11.80	\$300.00	3,540.00
Sep-05-19	JM	FINALIZE TRIAL PREPARATION; ATTEND TRIAL OF CASE;	11.80	\$300.00	3,540.00
Sep-05-19	JM	EMAILS WITH ANDREW LINDEMANN AND CATHERINE ORTMANN, JUDGE HOOD'S LAW CLERK, RE: TRIAL.	0.60	\$300.00	180.00
Sep-05-19	DC	prepare documents for trial	0.20	\$105.00	21.00
Sep-05-19	SB	Finalize preparation of trial materials; pre-trial communications with client; travel to and from courthouse and conduct trial of case.	12.00	\$300.00	3,600.00
Sep-06-19	SB	Emails with Andrew Lindemann and Jennifer Baker re: trial transcript request and payment for the same.	0.20	\$300.00	60.00
Nov-11-19	JM	PREPARE EMAIL TO ANDREW REQUESTED THAT WE HAVE UNTIL DECEMBER 6 TO SUBMIT PROPOSED ORDER DUE TO TRAVEL CONFLICT WITH CURRENT DEADLINE.	0.20	\$300.00	60.00
Nov-11-19	SB	Receive and review trial transcript; instructions to staff and legal team regarding the same.	1.20	\$300.00	360.00
Nov-13-19	JM	EMAILS WITH ANDREW LINDEMANN AND JUDGE BENJAMIN'S CHAMBERS.	0.20	\$300.00	60.00
Nov-15-19	JM	EMAILS WITH COURT AND CLIENT RE: STATUS UPDATE AND DATE PROPOSED ORDERS ARE DUE	0.30	\$300.00	90.00
Nov-15-19	JM	EMAILS WITH JUDGE BENJAMIN'S CHAMBERS RE: PROPOSED ORDERS; EMAILS WITH WENDY BRAWLEY RE: ANSWERING REQUEST FOR UPDATE ON CASE.	0.40	\$300.00	120.00
Dec-03-19	SB	Receive emails from Andrew Lindemann and Hazel Bridges re: Andrew's request for ten additional days	0.20	\$300.00	60.00
Dec-12-19	JM	BEGIN PROPOSED ORDER;	3.20	\$300.00	960.00

Invoice #	Date	Case	Description	Hours	Rate	Amount
Dec-17-19	CS		Conferred with JM regarding proposed Order; Began reviewing file documents and drafting Order.	2.50	\$225.00	562.50
Dec-18-19	CS		Continued drafting proposed Order; Review of Transcript, Case Law and FOIA Statute.	5.10	\$225.00	1,147.50
Dec-19-19	CS		Began to research and draft proposed Order; Conferred with JM regarding the same.	3.30	\$225.00	742.50
Dec-19-19	JM		REVIEW AND REVISE ORDER;	1.50	\$300.00	450.00
Dec-20-19	CS		Continued to research and draft proposed Order; Reviewed Trial Transcript and case law; Conferred with JM regarding the same; Revised proposed Order per comments from JM.	5.60	\$225.00	1,260.00
Dec-20-19	JM		PREPARE/FINALIZE ORDER ON MERITS;	6.70	\$300.00	2,010.00
Dec-21-19	SB		Receive and evaluate Andrew Lindemann's proposed order.	0.30	\$300.00	90.00
Dec-23-19	CKR		Processing and filing Proposed Order on Merits per Attorney's request.	0.40	\$105.00	42.00
Dec-23-19	SB		Perform final review and analysis of proposed order for client following trial; approve and file the same.	0.80	\$300.00	240.00
Dec-27-19	SB		Receive email from Ms. Bridges in Judge Benjamin's office confirming receipt of all orders.	0.10	\$300.00	30.00
Feb-13-20	JM		RECEIVE AND REVIEW EXECUTED ORDER; COMPARE TO PROPOSED ORDER; TELEPHONE CONFERENCE WITH WENDY BRAWLEY RE: SAME;	1.30	\$300.00	390.00
Feb-13-20	DC		receive and catalog electronic filed Final Order on the Merits; Calendar deadlines re Final order	0.20	\$105.00	21.00
Feb-25-20	DC		receive and catalog electronic file notice of motion to alter amended	0.10	\$90.00	9.00
Mar-05-20	CS		Reviewed Motion to Alter or Amend; Reviewed Final Order; Began drafting Response to Motion.	2.30	\$275.00	632.50
Mar-06-20	CS		Finished drafting Response Motion; Conferred with JM regarding the same.	2.00	\$275.00	550.00
Mar-11-20	JM		REVIEW/REVISE MEMO IN OPPOSITION TO RULE 59(E) MOTION;	2.90	\$300.00	870.00

Invoice#	Date	Party	Description	Hours	Rate	Amount
Jul-16-20	JM		REVIEW ORDER ON 59E;	0.40	\$300.00	120.00
Jul-16-20	DC		receive and catalog electronic filed order and judgment	0.10	\$90.00	9.00
Jul-20-20	JM		TELEPHONE CONFERENCE WITH WENDY BRAWLEY RE: ORDER ON 59E MOTION; EMAIL TO WENDY BRAWLEY RE: SAME;	0.60	\$300.00	180.00
Jul-23-20	JM		PREPARE AFFIDAVIT OF ATTORNEY'S FEES AND MOTION FOR SAME;	2.10	\$300.00	630.00
Jul-24-20	SB		Review initial order and revised order and consider whether any issue needs to be preserved by another Rule 59(e), or whether all issues have been raised and ruled upon.	1.20	\$300.00	360.00
Jul-27-20	SB		Teleconference with legal team agreeing not to pursue additional rule 59(e); review of affidavit of attorneys fee and bill to ensure proper submission per court's order.	0.80	\$300.00	240.00
Jul-28-20	DC		receive and catalog electronic filed attorneys fees	0.10	\$90.00	9.00
Aug-12-20	JM		RECEIVE, REVIEW MEMORANDUM IN OPPOSITION TO ATTORNEY'S FEES; BEGIN RESEARCHING AND FORMULATING RESPONSE TO SAME;	1.80	\$300.00	540.00
Aug-17-20	JM		RECEIVE, REVIEW NOTICE OF APPEAL; RESEARCH ISSUE OF PROCEDURAL STANDING OF ATTORNEY'S FEES ISSUE WITH APPEAL; TELEPHONE CONFERENCE WITH COURT OF APPEALS CLERK RE: SAME; EMAIL TO JUDGE BENJAMIN RE: SAME; PREPARE NOTICE OF APPEAL;	3.50	\$300.00	1050.00
Aug-18-20	JM		CONDUCT LEGAL RESEARCH RE: JURISDICTION OF COURT TO HEAR ATTORNEY'S FEES ARGUMENT;	1.10	\$300.00	330.00
Aug-18-20	DC		draft letter to Clerk of Court re Filing fee for Notice of Appeal	0.30	\$90.00	27.00
Aug-19-20	DC		catalog, prepare and finalize correspondence letter re filing fee; email correspondence to opposing counsel re same	0.30	\$90.00	27.00
Aug-20-20	JM		DRAFT MOTION TO HOLD IN ABEYANCE FOR LIMITED REMAND;	2.10	\$300.00	630.00
Aug-21-20	JM		PREPARE AND REVISE MOTION TO HOLD IN ABEYANCE FOR LIMITED REMAND; CONDUCT LEGAL	2.70	\$300.00	810.00

Invoice #	Date	Case	Description	Hours	Rate	Amount
			RESEARCH REGARDING CLAIM THAT FAILURE TO FILE MOTION IS DISPOSITIVE;			
Aug-21-20	DC		receive and catalog letter from Court of Appeals re initial letter	0.10	\$90.00	9.00
Aug-23-20	JM		FINALIZE MOTION WITH EXHIBITS;	1.10	\$300.00	330.00
Aug-24-20	JM		PREPARE TRANSMITTAL LETTER, COSAND FILE APPEAL;	0.70	\$300.00	210.00
Aug-24-20	DC		receive and catalog attorney research documents; bateslabel Motion to Hold in Abeyance as an Exhibit	0.40	\$90.00	36.00
Aug-24-20	DC		draft transmittal letter and certificate of service	0.50	\$90.00	45.00
Aug-25-20	JM		CORRESPONDENCE WITH COURT AND ALL PARTIES RE: CONFIRMATION OF FILING OF MOTION BECAUSE OF FIREWALL ISSUE;	0.40	\$300.00	120.00
Aug-25-20	DC		call to court of appeals re filed Moton to Hold in Abeyance; receive and catalog filed Motion to Hold in Abeyance	0.30	\$90.00	27.00
Aug-26-20	DC		draft transmittal letter to Court of Appeals re fee for filing Motion; prepare and finalize correspondence re same; email correspondence copy to opposing counsel	0.40	\$90.00	36.00
Sep-04-20	KM		Review/analyze Review appellate court rules to establish timeline for Reply to Appellant's Return to client's motion and confirm the lack of a "mail rule"	0.20	\$175.00	35.00
Sep-04-20	DC		receive and catalog Return to Motion	0.10	\$90.00	9.00
Sep-05-20	KM		Review/analyze Review appellate court rules to establish whether weekends and holidays are counted when the deadline for a Reply is less than seven days	0.10	\$175.00	17.50
Sep-14-20	DC		receive and catalog filed Reply to Return	0.10	\$90.00	9.00
Oct-05-20	JM		EMAIL FROM JUDGE BENJAMIN'S CLERK RE: ATTORNEY'S FEES AFFIDAVIT AND JURY TRIAL DEMAND; TELEPHONE CONFERENCE WITH ASSATA HERBERT RE: SAME; FOLLOW UP EMAIL WITH MS. HERBERT RE: SAME;	0.30	\$300.00	90.00
Oct-07-20	DC		receive and catalog electronic filed Order from Court of Appeals	0.10	\$90.00	9.00

Oct-14-20	JM	PREPARE REPLY MEMORANDUM TO RICHLAND COUNTYOS MEMO IN OPPOSITION TO AWARD OF ATTORNEYOS FEES	4.50	\$300.00	1350.00
Oct-15-20	JM	CONTINUE PREPARING REPLY MEMORANDUM TO RICHLAND COUNTYOS MEMO IN OPPOSITION TO AWARD OF ATTORNEYOS FEES;	3.50	\$300.00	1050.00
Oct-16-20	JM	CONTINUE PREPARING REPLY MEMORANDUM TO RICHLAND COUNTYOS MEMO IN OPPOSITION TO AWARD OF ATTORNEYOS FEES;	5.50	\$300.00	1650.00
Oct-19-20	JM	FINALIZE MEMO AND EXHIBITS FOR FILING;	2.10	\$300.00	630.00
Oct-19-20	CKR	Preparing and processing documents to be filed; prepare same for Attorney review; once documents are filed download and send all to Judge's law clerk for review.	1.00	\$105.00	105.00
Nov-9-20	SB	Review court filings, applicable case law, and prepare for and conduct extensive oral argument on Motion for Fees and Costs; update litigation team on court request for post-hearing submissions by Friday and ensure calendaring of the same.	5.20	\$300.00	1560.00

Total Legal Services \$88,425.50

Expenses

Mar-25-15	Richland County Clerk of Court for Filing Fees.	150.00
Apr-28-15	Postage	1.65
Aug-25-15	Richland County Clerk of Court for Filing Fees.	25.00
Aug-31-15	Postage	4.19
Mar-17-16	Richland County Clerk of Court for Motion Filing Fee	25.00
Nov-21-16	Richland County for Filing Fee	25.00
Jan-03-17	Richland County for Filing Fees	25.00
Jan-26-17	Carolina Investigative Associates for Service on Andy H. Metts	105.00
Jan-26-17	Carolina Investigative Associates for Service on Judy A. Carter Richland County Ombudsman	105.00
Jan-26-17	Carolina Investigative Associates for Service on Sara Salley	105.00
Jun-26-17	Carolina Investigative Associates, LLCfor Service on Judy A. Carter, Richland County Ombudsman	80.00
Jun-26-17	Carolina Investigative Associates, LLCfor Service on Sara Salley	80.00
Jun-26-17	Carolina Investigative Associates, LLC for Service on Andy H. Metts	80.00
Jul-05-17	Richland County for Filing Fee	25.00

Oct-02-17	Richland County for Motion Filing Fee	25.00
Nov-07-17	Serve-One of SC, LLC for Fee for Service on Judy A. Carter on 10/13/17	65.00
Nov-07-17	Serve-One of SC, LLC for Fee for Service on Sara Salley on 10/13/17	65.00
Jan-31-18	Serve-One of SC, LLC for Service on Andy H. Metts	105.00
Apr-27-18	Serve-One of SC, LLC for Fee for Service on Judy A. Carter	100.00
Apr-27-18	Serve-One of SC, LLC for Fee for Service on Andy H. Metts	100.00
Apr-27-18	Serve-One of SC, LLC for Fee for Service on Sara Salley	100.00
Jul-11-18	US Postal Service	0.89
Aug-15-18	Serve-One of SC, LLC for Fee for Service of Trial Subpoenas	195.00
Sep-07-18	Serve-One of SC, LLC for Fee for Service on Sara Salley	65.00
Sep-07-18	Serve-One of SC, LLC for Fee for Service on Andy H. Metts	65.00
Sep-07-18	Serve-One of SC, LLC for Fee for Service on Judy A. Carter	65.00
Oct-11-18	Richland County for Filing Fee	31.74
Jan-21-19	Serve-One of SC, LLC for Fee for Service on Andy H. Metts	65.00
Jan-21-19	Serve-One of SC, LLC for Fee for Service on Judy A. Carter	65.00
Jan-21-19	Serve-One of SC, LLC for Fee for Service Sara Salley	65.00
Nov-12-19	Deborah M. McCurdy, RPR for Transcript	819.75
Dec-23-19	Richland County for Filing Fee	31.74
Aug-18-20	South Carolina Court of Appeals for Filing Fees	250.00
Aug-19-20	U.S Postal Service	0.50
Aug-26-20	South Carolina Court of Appeals for Filing Fees	50.00
Aug-26-20	U.S Postal Service	1.00

Total Expenses \$3,166.46

Total Invoice Amount \$91,591.96

Balance (Amount Due) \$91,591.96

Carolina Investigative Associates, LLC
1643 B Savannah Hwy.
#138
Charleston, SC 29407
Phone: (843) 595-4627
Fax: (843) 595-4627

INVOICE

Invoice #SLW-2016000162
1/4/2017



Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, Suoth Carolina

Served: 12/30/2016 6:07 pm
To be served on: Andy H. Metts

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Metro Rush	1.00	105.00	105.00
TOTAL CHARGED:			\$105.00
BALANCE DUE:			\$105.00

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR PAYMENT.

This invoice represents an extension of credit to you. Payment is due on or before 15 days from invoice date.
Payments not received by due date will incur a \$25.00 late fee or 10% of balance greater than \$250.00.

Carolina Investigative Associates, LLC
1643 B Savannah Hwy.
#138
Charleston, SC 29407
Phone: (843) 595-4627
Fax: (843) 595-4627

INVOICE

Invoice #SLW-2016000163
1/4/2017



Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Non-Served: 12/30/2016
To be served on: Judy A. Carter Richland County Ombudsman

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Metro Rush	1.00	105.00	105.00
TOTAL CHARGED:			\$105.00
BALANCE DUE:			\$105.00

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR PAYMENT.

This invoice represents an extension of credit to you. Payment is due on or before 15 days from invoice date.
Payments not received by due date will incur a \$25.00 late fee or 10% of balance greater than \$250.00.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7786
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018001139
7/17/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 7/10/2018 6:58 am
To be served on: Andy H. Metts

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29801
Phone: (864) 235-7788
Fax: (864) 232-8420
81-1892868

INVOICE

Invoice #SJB-2018001140
7/17/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 7/12/2018 8:39 am
To be served on: Sara Salley

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892868.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7786
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018001138
7/13/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 7/9/2018 11:25 am
To be served on: Judy A. Carter

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018001492
8/29/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 8/22/2018 11:28 am
To be served on: Sara Salley

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018001494
8/29/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 8/24/2018 8:05 am
To be served on: Andy H. Metts

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018001493
8/24/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 8/21/2018 2:37 pm
To be served on: Judy A. Carter

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866. INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30 DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR BUSINESS.

Payment Receipt Confirmation

Your payment was successfully authorized. Your credit or debit card will not be charged until the Clerk of Court accepts your filing.

*used J Mann
Credit Card*

Receipt Contact Information

Contact Name	Richlan	Contact Phone	(803)	Contact Address	PO Box
	d		576-		2766
	County		1951		Columb
	Commo				ia, SC
	n Pleas				29202-
	Court				2766

13614

Transaction Summary

		<i>Receipt Confirmation</i>
Description		Amount
Richland County - Common Pleas - E-Filing		\$30.00
	SC.GOV Total	\$31.74

The online price of items or services purchased through SC.GOV, the state's official Web portal, includes funds used to develop, maintain, enhance and expand the service offerings of the state's portal.

Customer Information

Customer Name	Jenkins McMillan Mann	Receipt Date	10/11/2018
Local Reference ID	F_1136079_2416	Receipt Time	04:52:52 PM EDT

Payment Info

Payment Type	Credit Card	Credit Card Num...	*****1234
Credit Card Type	VISA	Order ID	64117290
		Name on Credit...	Rogers Lewis Jackson Mann Quinn

Billing Information

Billing Address PO Box 11803
Billing City, State Columbia, SC
ZIP/Postal Code 29211
Country US

Phone Number 803-978-2831

This receipt has been emailed to the address below.

Email Address jmann@rogerslewis.com

13614

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892886

INVOICE

Invoice #SJB-2018002031
1/21/2019

Original Date: 11/26/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 11/19/2018 7:43 pm
To be served on: Andy H. Metts

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892886.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.

#13614

Serve-One of SC, LLC
512 Pattigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018002033
1/21/2019

Original Date: 11/26/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 11/19/2018 1:30 pm
To be served on: Judy A. Carter

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.

#13614

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018002035
1/21/2019

Original Date: 11/30/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 11/27/2018 8:47 am
To be served on: Sara Salley

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866.
INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30
DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR
BUSINESS.



State of South Carolina
The Circuit Court of the Fifth Judicial Circuit

Deborah M. McCurdy
Circuit Court Reporter

Registered Professional
Reporter

November 11, 2019

1403 Geiger Avenue
Columbia, SC 29201
803.771.4401
dmccurdy@sccourts.org

Shaun C. Blake, ESQ.
Rogers Lewis Jackson Mann & Quinn, LLC
1901 Main Street
Suite 1200
Columbia, SC 29201
sblake@rogerslewis.com

RE: TRANSCRIPT OF RECORD
WENDY BRAWLEY V. RICHLAND COUNTY, SOUTH CAROLINA
2015-CP-40-1805
SEPTEMBER 5, 2019
RICHLAND COUNTY COURT OF COMMON PLEAS
BEFORE THE HONORABLE DEANDREA G. BENJAMIN

1 Original + 1 Copy	306 Pages @ \$5.25	\$1606.50
1 Word Index of	33 Pages @ \$1.00	<u>\$ 33.00</u>
		<u>\$1639.50</u>

½ to be split with Defense counsel -- YOUR TOTAL \$ 819.75

I DO HEREBY CERTIFY
that the above bill is true and accurate.

MAKE PAYABLE TO:

s/Deborah M. McCurdy
Deborah M. McCurdy, RPR
Circuit Court Reporter

THANK YOU!

13614

Brawley v Richland
Co
(Thomas / Lower Richland)

[Skip to main content](#)

Payment Receipt Confirmation

Your payment was successfully authorized. Your credit or debit card will not be charged until the Clerk of Court accepts your filing.

Receipt Contact Information

Contact Name	Richland County Common Pleas Court	Contact Address	PO Box 2766 Columbia, SC 29202- 2766
Contact Phone	(803) 576-1951		

Transaction Summary

		<i>Receipt Confirmation</i>
Description		Amount
Richland County - Common Pleas - E-Filing		\$30.00
	SC.GOV Total	\$31.74

The online price of items or services purchased through SC.GOV, the state's official Web portal, includes funds used to develop, maintain, enhance and expand the service offerings of the state's portal.

Customer Information

Customer Name	Shaun C. Blake	Receipt Date	12/23/2019
Local Reference ID	F_2362554_3030	Receipt Time	09:32:37 AM EST

Payment Info

Payment Type	Credit Card	Credit Card Num...	*****2798
Credit Card Type	VISA	Order ID	85061508
		Name on Credit ...	Christian Rogers

ELECTRONICALLY FILED - 2020 Nov 30 2:04 PM - RICHLAND - COMMON PLEAS - CASE#2015CP4001805

Carolina Investigative Associates, LLC
1643 B Savannah Hwy.
#138
Charleston, SC 29407
Phone: (843) 595-4627
Fax: (843) 595-4627

INVOICE

Invoice #SLW-2016000164
1/4/2017



Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Non-Served: 1/3/2017
To be served on: Sara Salley

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Metro Rush	1.00	105.00	105.00
TOTAL CHARGED:			\$105.00
BALANCE DUE:			\$105.00

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR PAYMENT.

This invoice represents an extension of credit to you. Payment is due on or before 15 days from invoice date.
Payments not received by due date will incur a \$25.00 late fee or 10% of balance greater than \$250.00.

Carolina Investigative Associates, LLC
1643 B Savannah Hwy.
#138
Charleston, SC 29407
Phone: (843) 595-4627
Fax: (843) 595-4627

INVOICE

Invoice #SLW-2017000035
6/22/2017



Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 6/19/2017 11:08 am
To be served on: Judy A. Carter Richland County Ombudsman

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Metro Routine	1.00	80.00	80.00
TOTAL CHARGED:			\$80.00
BALANCE DUE:			\$80.00

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR PAYMENT.

This invoice represents an extension of credit to you. Payment is due on or before 15 days from invoice date.
Payments not received by due date will incur a \$25.00 late fee or 10% of balance greater than \$250.00.

Carolina Investigative Associates, LLC
1643 B Savannah Hwy.
#138
Charleston, SC 29407
Phone: (843) 595-4627
Fax: (843) 595-4627

INVOICE

Invoice #SLW-2017000036
6/22/2017



Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 6/20/2017 10:30 am
To be served on: Sara Salley

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Metro Routine	1.00	80.00	80.00
TOTAL CHARGED:			\$80.00
BALANCE DUE:			\$80.00

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR PAYMENT.

This invoice represents an extension of credit to you. Payment is due on or before 15 days from invoice date.
Payments not received by due date will incur a \$25.00 late fee or 10% of balance greater than \$250.00.

Carolina Investigative Associates, LLC
1643 B Savannah Hwy.
#138
Charleston, SC 29407
Phone: (843) 595-4627
Fax: (843) 595-4627

INVOICE

Invoice #SLW-2017000037
6/21/2017



Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 6/19/2017 8:35 pm
To be served on: Andy H. Metts

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Metro Routine	1.00	80.00	80.00
TOTAL CHARGED:			\$80.00
BALANCE DUE:			\$80.00

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR PAYMENT.

This invoice represents an extension of credit to you. Payment is due on or before 15 days from invoice date.
Payments not received by due date will incur a \$25.00 late fee or 10% of balance greater than \$250.00.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2017001272
10/16/2017

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 10/13/2017 10:32 am
To be served on: Judy A. Carter

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866. INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30 DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax: (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2017001271
10/16/2017

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koester
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 10/13/2017 10:12 am
To be served on: Sara Salley

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
TOTAL CHARGED:			\$65.00
BALANCE DUE:			\$65.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866. INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30 DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR BUSINESS.

Serve-One of SC, LLC
 512 Pettigru Street
 Greenville, SC 29601
 Phone: (864) 235-7766
 Fax: (864) 232-8420
 81-1892866

INVOICE

Invoice #SJB-2017001273
 1/29/2018

Original Date: 10/18/2017

Rogers Lewis Jackson Mann & Quinn, LLC
 P.O. Box 11803
 Columbia, SC 29211

Your Contact: Tyler Koester
 Case Number: Richland 2015-CP-40-1805

Plaintiff:
 Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
 Richland County, South Carolina

Served: 10/17/2017 11:40 am
 To be served on: Andy H. Metts

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Additional Address Loyal Customer	1.00	30.00	30.00
Service Fee Loyal Customer	1.00	65.00	65.00
Late Fee	1.00	10.00	10.00
TOTAL CHARGED:			\$105.00
BALANCE DUE:			\$105.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866. INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30 DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29601
Phone: (864) 235-7766
Fax (864) 232-8420
81-1892866

INVOICE

Invoice #SJB-2018000640
4/23/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: Tyler Koeslar
Case Number: Richland 2015-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 4/18/2018 12:35 pm
To be served on: Judy A. Carter

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
Rush Fee Loyal Customer	1.00	35.00	35.00
TOTAL CHARGED:			\$100.00
BALANCE DUE:			\$100.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866. INVOICES ARE DUE UPON RECEIPT. A \$5.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30 DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR BUSINESS.

Serve-One of SC, LLC
512 Pettigru Street
Greenville, SC 29801
Phone: (864) 235-7788
Fax (864) 232-8420
81-1892888

INVOICE

Invoice #SJB-201800842
4/23/2018

Rogers Lewis Jackson Mann & Quinn, LLC
P.O. Box 11803
Columbia, SC 29211

Your Contact: ~~Walter Koester~~
Case Number: Richland 2016-CP-40-1805

Plaintiff:
Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
Richland County, South Carolina

Served: 4/17/2018 9:29 pm
To be served on: Andy H. Metts

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
Rush Fee Loyal Customer	1.00	35.00	35.00
TOTAL CHARGED:			\$100.00
BALANCE DUE:			\$100.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892888. INVOICES ARE DUE UPON RECEIPT. A \$6.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30 DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR BUSINESS.

Serve-One of SC, LLC
 512 Pettigru Street
 Greenville, SC 29601
 Phone: (864) 235-7766
 Fax: (864) 232-8420
 81-1892866

INVOICE

Invoice #SJB-2018000641
 4/23/2018

Rogers Lewis Jackson Mann & Quinn, LLC
 P.O. Box 11803
 Columbia, SC 29211

Your Contact: ~~Tyler Keaster~~
 Case Number: Richland 2015-CP-40-1808

Plaintiff:
 Hopkins and Lower Richland Citizens United, Inc. and Wendy Brawley

Defendant:
 Richland County, South Carolina

Served: 4/18/2018 12:19 pm
 To be served on: Sara Salley

ITEMIZED LISTING

Line Item	Quantity	Price	Amount
Service Fee Loyal Customer	1.00	65.00	65.00
Rush Fee Loyal Customer	1.00	35.00	35.00
TOTAL CHARGED:			\$100.00
BALANCE DUE:			\$100.00

PLEASE INCLUDE LAST FOUR DIGITS OF THE INVOICE NUMBER ON YOUR CHECK. Federal Tax #81-1892866. INVOICES ARE DUE UPON RECEIPT. A \$6.00 LATE FEE WILL BE ADDED TO ALL INVOICES NOT PAID WITHIN 30 DAYS. AN ADDITIONAL \$10.00 WILL BE ADDED FOR EACH 30 DAYS THEREAFTER. WE APPRECIATE YOUR BUSINESS.