Law Offices of

ROBERT T. HANLON & ASSOCIATES, P.C.

131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

Phone: 815-206-2200 Fax: 815-206-6184

March 1, 2018

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Road District c/o Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014



Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17 - CH - 482 Illinois Labor Relations Board Matters Local 150 Claims for other relief

Our File #17-0026

Date	Atty/Para	Item	Hours	 amount
2/1/2018	RTH	Prepare draft ansswer to complaint for hearings Vers1,2,3 related legal research review of record and correspond with MEA	5.25	\$ 1,968.75
2/1/2018	RTH	receive e-mail from MEA re ILRB	0.25	\$ 93.75
2/2/2018	RTH	Revise Draft answer on Local 150 latest comp	4	\$ 1,500.00
2/5/2018	RTH	begin legal research into and prepare memorandum of law re amendment of ILRB Complaint and discuss with MEA	8.3	\$ 3,112.50
2/6/2018	RTH	Continue legal research, expansion of research to include Seventh Circuit	8.5	\$ 3,187.50
2/7/2018	RTH	revise and redraft answer and related legal research and correspond with MEA	2	\$ 750.00
2/8/2018	RTH	Legal research re & draft additional defenses, review motion for dismissal & draftopposition, begin prepare Opposition Ver. 14 & correspond w/MEA.	5	\$ 1,875.00
2/9/2018	RTH	Travel to and Attend hearing on claim of RG for unemployment benefits and return trip (travel totals 1.1 hrs.)	3.1	\$ 1,162.50
		Continue prepare Opposition Vers. 14-17 & related legal research & correspond with AGAsser Telephon		
2/9/2018	RTH	(teleconference 1/2 hr after research	8.25	\$ 3,093.75
2/9/2019	RTH	ILRB filing in case S-CA-17-137	1	\$ 375.00
2/10/2018	RTH	tel conf A gasser	0.25	\$ 93.75
2/12/2018	RTH	Prepare Opposition Vers. 18-21 & correspond w/MEA	4.5	\$ 1,687.50

2/13/2018	RTH	teleconf with MEA	0.7	\$	262.50
		Review arguments for response to motion to dismiss			
		counterclaims, discuss with MEA/TC, draft and edit			
	RTH	amended opposition response	0.25	\$	93.75
	RTH	Legal analysis of response to motion to dismiss, edit	3	\$	1,125.00
/15/2018	RTH	make revisions to response to motion to dismiss	4.5	\$	1,687.50
		four documents filed in Sweeney v Road District review			
2/16/2018	RTH	and check pleadings for misuse of authority	8.25	\$	3,093.75
2/16/2016	RTH	File Documents	1	\$	375.00
		Receive E-mail from MEA re response to Local 150			
2/16/2018	RTH	Motion to Dismiss, review attachment, make edits	2.5	\$	937.50
2/19/2018	RTH	Legal Research re: authority of highway commissioner	2	\$	750.00
		Research regarding detailed allegations and case law in			
		Union motion to dismiss/discuss with MEA finalize			
2/19/2018	RTH	Response for Filing	3.25	\$	1,218.75
		Recieve ALJ decision on the merits that termination of			
2/23/2017	RTH	Ryan Green was valid.	0.25	\$	93.75
2/23/2018	RTH	Travel to meet AG	0.75	\$	281.25
2/23/2018	RTH	Discussion with A. Gasser re ALJ decision	1.25	\$	468.75
2/27/2018	RTH	Review grievance and discuss with RTH	0.25	\$	93.75
		Review Local 150 Filings and affirmative defenses for new			
2/27/2018	RTH	ILRB Complaint	1.2	\$	450.00
2/1/2018	MEA	Review draft answer, edit, prepare for service	1	\$	515.00
2/2/2018	MEA	review 605 ILCS 5/6-101	1.75	\$	901.2
2/2/2018	MILA	Review complaint and counterclaims, ILRB requests for	1.75	Ψ.	701.20
		information, researchissues for detailed analysis, discuss			
2/5/2018	MEA	with RH.	1.17	\$	602.55
2/3/2010	MEA	review 60 ILCS 1/80-10(a), 60 ILCS 1/235-25.	0.25	\$	128.75
	IVILIT	review 60 ILCS 1/73-5; 605 ILCS 5/6 In context of	0.23	1	12017
	MEA	L150 Motion	0.5	\$	257.50
2/6/2018	MEA	Review research and annotations to ILRB case law;	0.25	\$	128.75
2/0/2010	111211	Draft outline to possible answer to ILRB complaint, review	0.20	-	
2/7/2018	MEA	issues with RH	0.5	\$	257.50
2,7,2010		Legal research re & draft additional defenses, review			
		motion for dismissal & draftopposition, begin prepare			
2/8/2018	MEA	Opposition Ver. 14 & correspond w/MEA.	2.5	\$	1,287.50
2/9/2018	MEA	Review and discuss pending matters and filings with RH.	0.33	\$	169.95
2/3/2010		Review arguments for response to motion to dismiss			
		counterclaims, discuss with TC/RH, draft and edit amended	4 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
2/12/2018	MEA	opposition response	0.75	\$	386.25
2/13/2018	MEA	Legal analysis of response to motion to dismiss, edit	5.67	\$	2,920.05
		Draft and edit response in opposition to motion to dismiss;		1	
2/15/2018	MEA	discuss with RH and TC	6.75	\$	3,476.25
		Research regarding detailed allegations and case law in			
		Union motion to dismiss/discuss with RH finalize Response			
2/16/2018	MEA	for Filing	4.5	\$	2,317.50
2/20/2018	MEA	Review grievance and discuss with RTH	0.25	\$	128.75
		Review Local 150 Filings and affirmative defenses for new	0.20	+	
2/27/2018	MEA	ILRB Complaint	1.2	\$	618.00

Total Professional Services Rendered February	106.92	\$	43.926.80
Total Professional Services Relidered Pedruary	100.92	D ,	43,920.00

Please remit Payment in the amount of \$43,458.05 for this invoice.

Total Now Due for February Work

<u>\$43,926.80</u>

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00. Std Rate for MEA= \$515

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Law Offices of

ROBERT T. HANLON & ASSOCIATES, P.C.

131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

Phone: 815-206-2200 Fax: 815-206-6184

April 2, 2018

Andrew Gasser
Algonquin Township Highway Commissioner
Algonquin Township Road District
c/o
Algonquin Township Highway Department
3702 U.S. Highway 14
Crystal Lake, Illinois 60014



Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17 - CH - 482 Illinois Labor Relations Board Matters Local 150 Claims for other relief

Our File #17-0026

Date	Atty/Para	Item	Hours	amount
3/6/2018	MEA	Review new ILRB complaint against Road District, draft answer and affirmativedefenses, review union court files	1.42	\$ 731.30
3/7/2018	MEA	Review affirmative defenses and allegations for Answer	0.17	\$ 87.55
3/8/2018	MEA	Review new FMCS arbitration papers, discuss with RH.	0.25	\$ 128.75
3/9/2018	MEA	Discuss hearing on Motion to Dismiss with RH	0.25	\$ 128.75
3/9/2018	MEA	Review memorandum in opposition to motion to dismiss counterclaims, discuss w/RH	1.17	\$ 602.55
3/12/2018	MEA	review current case status with RTH	0.17	\$ 87.55
3/21/2018	MEA	Review Actions for Amended Counterclaims with RH	0.75	\$ 386.25
3/30/2018	MEA	Review hearing transcript and Union reply to Motion to Dismiss discuss actions with RTH	1.25	\$ 643.75

3/6/2018	RTH	Receive andedit response to complaint in S-CA-18-067	3.5	\$ 1,312.50
3/6/2018	RTH	Send to MEA edits and final changes	0.25	\$ 93.7
3/7/2018	RTH	make final edits and File with ILRB documents	2.7	\$ 1,012.5
3/7/2018	RTH	Send correspondence to Agasser	0.5	\$ 187.50
3/8/2018	RTH	Meeting with Agasser	2.25	\$ 843.75
3/8/2018	RTH	Preparation for Court hearing and Cases reviews and arguments on Dillions Rule and anticipation of claims by Locla 150 at hearing prepare outline	4.7	\$ 1,762.50
3/9/2018	RTH	Hearing McHenry county circuit court	2	\$ 750.00
3/9/2018	RTH	Discussion with Agasser re court and teleconf with MEA	1.25	\$ 468.75
3/13/2018	RTH	Meeting with AGASSER	2.25	\$ 843.75
3/14/2018	RTH	Research into amended complaint issues for consideration and preserving matters for appeal	7	\$ 2,625.00
3/15/2018	RTH	Draft Amended Complaitn against Local 150	4.5	\$ 1,687.50
3/16/2018	RTH	amend complaitn to consider fraudulent public purpose of Miller execution	2	\$ 750.00
3/16/2018	RTH	Meeting with A Gasser to discuss nature of amendments and application of law	2.25	\$ 843.75
***************************************		Total Due for Professional Services Rendered in March on Local 150 Matters	40.58	\$ 15,977.7

Please remit Payment in the amount of \$15,977.70 for this invoice.

Total Now Due for March Work February Billing Past Due \$43,926.80 \$15,977.70

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00. Std Rate for MEA= \$515



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May 4, 2018

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Road District c/o Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17 - CH - 482 Illinois Labor Relations Board Matters Local 150 Claims for other relief

Our File #17-0026



Date	Atty/Para	Item	Hours	1	amount
4/3/2018	RTH	Research into caselaw for amended complaint on additional count	2.5	\$	937.50
4/4/2018	RTH	Draft amended complaint have CJ send to MEA	3.5	\$	1,312.50
4/4/2016	KIH	Drait amended companit have C3 send to MEA	3.3	•	1,512.50
4/4/2018	RTH	Receive correspondence review and discuss with MEA in light of no grievance having been filed on employee part	1	\$	375.00
4/4/2018	RTH	ILRB documetns to be amended for final and filing	4.5	\$	1,687.50
4/4/2018	RTH	file documetns with ILRB	0.5	\$	187.50
4/12/2018	RTH	deliver to MEA draft amended Complaint	1.2	\$	450.00
4/13/2018	RTH	receive information thatMEA must withdraw from case because of recent presidential appointment and subsecquent appointment of MEA to USDOL	0.5	\$	187.50
4/13/2018	RTH	Communicate with TC re employment directly with RTH on ALG Matter	0	\$	-



4/13/2018	MEA	Review Draft Counter-claim and Case law discuss ith RH	1	\$ 515.0
4/20/2018	RTH	Discussion on local strategy after MEA Withdraws		\$ 375.0
4/25/2018	RTH	Assessment of whether or not Expert testimony would be necessary as it relates to amended complaint and issues in Circuit Corut and conflicting positions of Local 150 in different forumns	3.5	\$ 1,312.5
4/28/2018	RTH	Receive commun from MEA re pending matters and conference call (Saturday)	2.25	\$ 843.7
4/30/2018	RTH	Receive from MEA Motion to Withdraw	0.25	\$ 93.7
4/30/2018	RTH	Send E-mail to Diemer/Pierson re Mike's Withdraw	0.25	\$ 93.7
Due for Apr	ril 2018 fo	r professional Services Rendered		\$ 8,371.2

Please remit Payment in the amount of \$8,371.25 for this invoice.

Total Now Due for April Work

\$8,371.25

February Billing Past Due \$43,926.80

March Billing Past Due \$15,977.70

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00. Std Rate for MEA= \$515

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131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

Phone: 815-206-2200 Fax: 815-206-6184

October 5, 2017

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17CH-482

RTH File #17-0026

<u>Date</u>	Atty/Pa	ra <u>Item</u>	<u>Hours</u>		Amou	
9/1/2017	RTH	Meeting with Andrew Gasser		\$	375.00	
	2. A20. (2.02) \$1000000	The second of th	nica a confinincia de comunicación a completa de comunicación	Na III are the same		
9/2/2017	RTH	Respond to court Administration multiple recusals	0.25	\$	93.75	
9/6/2017	RTH	Prepare motion before the ILLRB	4,5	\$	1,687.50	
		Receive telephonic call from AG re LOCAL 150 while on vacation in France	0.5	\$	187.50	
9/15/2017	RTH	Perpare Motion to Stay continued	3	\$	1,125.00	
9/17/2017	RTH	Review motion for Change of Judge	0.5	\$	187.50	
9/18/2017	RTH	Tele with AG re activity while RTH was in France	0.75	\$	281.25	
9/22/2017	RTH	receive Brief from MEA re ILLRB	0.1	\$	37.50	
9/26/2017	RTH	Receive Order of default at ILLRB despite not representing the named party and order of default against unserved Highway Department	1	\$	375.00	
9/26/2017	RTH	Telephonic with AG re service on Highway department of any documetns from ILLRB - No service	1	\$	375.00	
9/26/2017	RTH	E-mail to MEA draft re motion to Vacate	1	\$	375.00	
9/27/2017	RTH	File with Court 707 Statement re Pro Hac Vice	0.5	\$	187.50	
9/27/2017	RTH	Receive e-mail from MEA re Pro Hac Vice	0.5	\$	187.50	
9/27/2017	RTH	Receive recommended changes and analysis from MEA	0.1	\$	37,50	
9/27/2017	RTH	Execute 707 Forms re MEA	0.1	\$	37.50	
9/28/2017	RTH	Contact MEA re ARDC application in this case	0.5	\$	187.50	
9/28/2017	RTH	Receive e-mail from MEA re memorandum to be filed	1.5	\$	562.50	
9/29/2017	RTH	Finalize revisions to MTD				

10/1/2017	RTH	Court Appearance Preperation (Sunday)	2.5	\$ 937.50
10/2/2017	RTH	Court Appearance	1	\$ 375.00
10/2/2017	RTH	Receive Motion for Default in ILLRB matter on entity not served andnot represented - back dated to 9/14/17.		\$ 375.00
43010	RTH	E-mail Motion and order to MEA (45 min teleconf)	1	\$ 375.00
10/2/2017	RTH	Call AG re Local 150 motion	0.3	\$ 112.50
10/2/2017	RTH	Prepare Affidavit for AG	0.5	\$ 187.50
10/2/2017	RTH	Prepare Declaration	0.5	\$ 187.50
10/2/2017	RTH	Prepare M2V at ILLRB	5	\$ 1,875.00
10/2/2017	RTH	Send M2V to MEA	0.2	\$ 75.00
9/1/2017	TC	Memo re Raod District not Township	8	\$ 2,000.00
9/1/2017	MEA	review response to Local 150 Motion to dismiss, edit research and finalize	6.5	\$ 3,347.50
9/1/2017	MEA	e-mail to RTH Response document re 150 MTD	2.2	\$ 1,133.00
9/1/2017	MEA	e-mail to RTH Response document re 150 MTD (continued)	1.2	\$ 618.00
9/4/2017	MEA	Case management doc and calendar review	0.5	\$ 257.50
9/14/2017	MEA	Telephone Conference with CJ re Local 150 and ALG TWP	0.5	\$ 257.50
9/22/2017	MEA	Revise Motion to stay and motion to stay	6.5	\$ 3,347.50
9/28/2017	MEA	Legal research and send e-mail to RTH re draft by RTH	2.25	\$ 1,158.75
9/29/2017	MEA	Telephonic with RTH and AG re Local 150 ILLRB mtv	1.15	\$ 592.25
			57.6	\$ 23,512.00

Please remit Payment in the amount of \$23,512.00

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00

Std Rate for MEA= \$515

Std Rate for TC = \$250.00

Std Rate for JC = \$175 (Paralegal) no charges on this billing cycle for JC.

Amount Previously Billed	\$	40,488.70
Amount Previously paid	\$	40,488.70
Unpaid Prior Balance	\$	47
Amount due	S	23,512.00
Average per hour	\$	408.19

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131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

Phone: 815-206-2200 Fax: 815-206-6184

August 8, 2017

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17CH-482

RTH File #17-0026

<u>Date</u>	Atty/Para	<u>Item</u>	Hours	Amount
6/17/2017	TC	continue legal research IL Codes and memo - review additional materials and correspondences from MEA and RTH	6.83	\$1,639.20
6/18/2017	TC	Continue legal research Illinois constitutional cases & memorandum & review Continue legal research public official accountability & memorandum & correspond	6.33	\$1,519.20
6/19/2017	TC	w/ MEA	2.83	\$679.20
6/20/2017	TC	Continue legal research & memorandum & correspond w/ MEA	1.50	\$360.00
6/21/2017	TC	Continue legal research & memorandum & correspond w/ MEA	1.67	\$400.80
6/22/2017	TC	Review arguments with MEA N/C	0.33	\$79.20
7/3/2017	TC	Review and revise memorandum and related legal research	7.67	\$1,840.80
7/11/2017	TC	Review & prepare comments re Local 150's filings & related legal research	7.33	\$1,759.20
7/13/2017	TC	begin editing draft reply	5.67	\$1,360.80

Date	Atty/Para	Item Edit Memorandum, review Illinois statutom.	<u>Hours</u>	Amount
6/20/2017	MEA	Edit Memorandum; review Illinois statutory issues	2.00	\$1,030.00
6/26/2017	MEA	Edit Memorandum for TRO, research complaint allegations Finalize draft complaint, review Illinois Code, TRO case law, injunction case law highway code provisions, edit memorandum	2.25	\$1,158.75
6/27/2017	MEA	of law, legal research.	6.00	\$3,090.00
6/28/2017	MEA	Edit memorandum	1.25	\$643.75
6/28/2017	MEA	Edit memorandum - review case law	4.00	\$2,060.00
6/30/2017	MEA	Review and edit final versions of memo with RTH Teleconf with RH, edit memorandum in	1.00	\$515.00
7/3/2017	MEA	support of TRO	0.50	\$257.50
7/6/2015	MEA	Coordinate case process with RTH	0.50	\$257.50
7/10/2017	MEA	review TRO hearing with RTH	0.25	\$128.75
7/11/2017	MEA	Review comments re Local 150's filings	0.50	\$257.50
7/18/2017	MEA	Review RTH brief and comments Review Local 150 response in light of	0.25	\$128.75
		research	0.50	\$257.50
6/20/2017	RTH	Meeting with A. Gasser legal research - discussion with MEA - drafting of pleading re local 150 -	2.25	\$843.75
6/21/2017	RTH	termination of emp legal research - drafting of pleading re local	4.67	\$1,751.25
6/24/2017	RTH	150 - termination of emp - Il Highway code	3.25	\$1,218.75
6/24/2017	RTH	Amjur research authority to bind	2.25	\$843.75
6/24/2017	RTH	meeting with A. Gasser receive e-mail from MEA re legal research	2.00	\$750.00
6/27/2017	RTH	into highway code and Road District Legal research - bargaining power to bind	0.25	\$93.75
6/27/2017	RTH	successor Confer with MEA - re draft Complaint	3.50	\$1,312.50
6/28/2017	RTH	against Local 150 continue drafting complaint against Local	0.75	\$281.25
6/28/2017	RTH	150	4.67	\$1,751.25
6/29/2017	RTH	review docket MCH re Local 150	0.25	\$93.75
6/29/2017	RTH	telephonic A gasser Edit draft changes by MEA and make	0.25	\$93.75
6/29/2017	RTH	changes to Complaint 4 Emails sent to James P. Kelley re Local 150 and verification request for former clerk	4.67	\$1,751.25
6/29/2017	RTH	signature	0.50	\$187.50

6/29/2017	RTH	meeting with A Gasser	1.25	\$468.75
6/30/2017	RTH	meeting with A Gasser	1.50	\$562.50
6/30/2017	RTH	Drafted Counter-claim converting Complaint	4.67	\$1,751.25
7/3/2017	RTH	Draft to Local 150	0.25	\$93.75
7/3/2017	RTH	Mailed and Faxed documents to L150	0.50	\$187.50
		Responded to telephone call on holiday -		
7/4/2017	RTH	N/C	1.00	
= /= /0.01 =	D 0711	Sent e-mail to Dale Pierson re answer	0.50	#105.50
7/7/2017	RTH	counterclaim and TRO motion	0.50	\$187.50
7/7/2017	RTH	e-mail to MEA	0.25	\$93.75
7/10/2017	RTH	Court Appearance	1.25	\$468.75
7/10/2017	RTH	meeting with A. Gasser	1.67	\$626.25
7/10/2017	RTH	e-mail to MEA	0.25	\$93.75
7/10/2017	RTH	e-mail to MEA - documents exhibits ect	0.75	\$281.25
7/11/2017	RTH	Research into cases relied upon by local	3.75	\$1,406.25
7/11/2017	RTH	Research into cases relied upon by local	2.67	\$1,001.25
7/12/2017	RTH	Draft reply	3.25	\$1,218.75
7/13/2017	RTH	Draft reply	4.67	\$1,751.25
7/13/2017	RTH	Meeting with A. GASSER	2.00	\$750.00
7/14/2017	RTH	receive e-mail from B. Diemer of Local 150	0.25	\$93.75
7/14/2017	RTH	telephonic with A Gasser	0.25	\$93.75
7/18/2017	RTH	Sent e-mail to Local 150 - Brian Diemer	0.50	\$187.50
7/18/2017	RTH	Conf with CJ and MEA re Local 150	0.25	\$93.75
7/18/2017		Finish and File reply brief	3.25	\$1,218.75
		A gasser communication re documents		
7/20/2017	RTH	received and filed with clerk re 150	0.25	\$93.75
5/04/0015	D. TOTAL	research into unfair labor practice charges	2.25	Φ0.42.75
7/24/2017	RTH	and	2.25	\$843.75
7/28/2017	RTH	Court Prep - re TRO and case management	3.20	\$1,200.00
9/1/2017	DTH	receive motion to compel arbitration in open	0.25	¢02.75
8/1/2017	RTH	Court American	0.25	\$93.75
8/1/2017	RTH	Court Appearance	1.00	\$375.00
8/1/2017	RTH	Meeting with A. Gasser	2.00	\$375.00
		TOTAL	132.05	\$46,007.15
			102.00	Ψ 10,007.13

Average Hr Rate = \$348.41

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00

Std Rate for MEA= \$515 Std Rate for TC = \$240.00

Std Rate for JC = \$175 (Paralegal) no charges on this billing cycle for JC.

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131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

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Phone: 815-206-2200

Fax: 815-206-6184

Invoice submitted to Andrew Gasser Highway Commissioner Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Matter

Local 150 v Algonquin Towsnhip Road Dist and

RTH Case Number 17-0026 MCH Case # 17-CH-482

<u>DATE</u> 5/15/2017	Atty/Sup RTH	p <u>Item Description</u> Meeting with Andrew Gasser re Local 150 and purported CBA	Hours 2.5	<u>Amount</u> 937.50
5/15/2017	RTH	Conferal with MEA re Featherbeading for Legal Reasearch	0.2	75.00
5/15/2017	RTH	Research re Termination and IL rulings re ILRB	2	750.00
5/15/2017	RTH	Review prior repudiation letter sent by AG before taking office	1	375.00
5/15/2017	RTH	Meeting w/A Gasser re repudiation letter and position	1.5	562.50
5/16/2016	RTH	Prepare summary of factual events for use with complaint	1.7	875.50
5/17/2017	RTH	Prepare correspondence - send e-mail to MEA re Repudiation of L150 agreement	0.6	225.00
5/22/2017	RTH	Telcom with AG, MEA re certification and Illinois labor Act, analysis of Illinois Township Act, Illinois LRB, Certification issues, and discussion re Unit determination	2	750.00
5/30/2017		Telcom with MEA & AG re evidence and need for additional information	0.8	300
5/30/2017	RTH	Meeting with AG re Local 150	0.75	281.25
5/30/2017	RTH	Legal Writing - Preperation of complaint for Declaratory and injunctive relief re unlawful contract	2	1125.00
6/5/2017	RTH	Receive claims of Local 150 re ILRB	3 0.75	1125.00 281.25
6/5/2017	RTH	Review Township cases and authority related to Highway Commissioner Duties	3.25	1218.75
6/9/2017	RTH	Send e-mail to MEA re Local 150 and AG	0.5	187.50
6/14/2017	RTH	Receive Demand for Arbirtration	0.2	75.00
6/14/2015	RTH	Research on arbirtration of contract claims in light of no contract claim	5.6	2100.00

6/17/2017	TC	Continue Legal research into claims re arbirtration and no contract	6.83	1537.50
6/18/2017	TC	Continue Legal research into claims re arbirtration and no contract	6.33	1425.00
6/19/2017	TC	Legal Research into public Official accountability and apearent authority with govt	2.83	637.50
6/20/2017	TC	Continue LR into Ap auth w/o actual authority and accountability	1.5	337.00
5/15/2017	MEA	Research re Termination and IL rulings re Illinois LRB cases and confer with RTH	1.25	643.75
5/17/2017	MEA	Review Illinois LRB alleged certification of Local 150 Review CBA	1.5	772.50
5/22/2017	MEA	Telcom with AG, MEA re certification and Illinois labor Act, analysis of Illinois	2	1030.00
5/30/2017	MEA	Telcom with AG, MEA re evidence and RTH prep of Declaratory releif	0.75	386.25
5/31/2017	MEA	Telcom with AG, MEA re missing documents and actions to take to obtian documents	0.25	128.75
6/5/2017	MEA	Review claims by Local 150 in charge to ILLB	0.25	128.75
6/6/2017	MEA	Legal research and analyze Illinois constitutional civil cases re property acq	0.75	386.25
6/9/2017	MEA	Review Open Meetings Act	0.75	386.25
6/15/2017	MEA	Legal Research re seting asside CBA	1.2	618.00
	MEA	Review Legal Analysis for declaratory action against L150	1	515.00
6/15/2017	MEA	Corespond with RTH and AG and Conf	0.55	283.25
6/15/2017	MEA	Review and edit Complaint	1.75	901.25
6/16/2017	MEA	Review research re Illinois caselaw on invalid contracts and public interest	1.5	772.50
Total Due		Total	Hours 57.34	Amount Due \$21,008.75

Please remit the sum of \$21,008.75



Law Offices of

ROBERT T. HANLON & ASSOCIATES, P.C.

131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

Phone: 815-206-2200 Fax: 815-206-6184

September 5, 2017

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17CH-482

RTH File #17-0026

<u>Date</u>	Atty/Para	<u>Item</u>	<u>Hours</u>	Amount
8/2/2017 8/3/2017	RTH RTH	Meeting with A Gasser re IL LRB letter Conference call with MEA re IL LRB	$\frac{0.75}{0.75}$	\$ 281.25 \$ 281.25
8/4/2017	RTH	Research items in IL LRB letter	$\frac{0.75}{0.75}$	\$ 281.25
8/4/2017	RTH	telephonic with MEA - Local 150	$\frac{0.75}{0.75}$	\$ 281.25
8/7/2017	RTH	meeting with A Gasser re local 150 and employment matters Discussion re local 150 re status of employees	1.35	\$ 506.25
8/8/2017	<u>RTH</u>	and purported CBA	<u>1.1</u>	\$ 412.50
8/8/2017	<u>RTH</u>	telephonic with MEA - Local 150	0.5	\$ 187.50
8/8/2017	<u>RTH</u>	research response ILLRB	<u>1.5</u>	\$ 562.50
8/14/2017	<u>RTH</u>	Preperation of Response to IL LRB	4.5	\$ 1,687.50
8/14/2017 8/14/2017 8/14/2017	RTH RTH RTH	Conf call with MEA re response to ULP - repudiation of CBA Meet with A Gasser re response to ILLRB e-mail to IL LRB	1.2 1.5 0.5	\$ 450.00 \$ 562.50 \$ 187.50
8/14/2017	RTH	e-mail to MEA re L150	0.2	\$ 75.00
8/15/2017	RTH	telephonic with A. Gasser	0.5	\$ 187.50
8/15/2017	RTH	telephonic with MEA - Re Local 150	0.5	\$ 187.50
8/15/2017	RTH	Send Response to ILLRB (1/2) - copy delivered to AG (1/2) legal research re seperation of Road District	1	\$ 375.00
8/16/2017	RTH	and Township	4.5	\$ 1,687.50
8/17/2017	<u>RTH</u>	legal research re seperation of Road District	<u>4</u>	\$ 1,500.00

and Township

		and rownship		
		Meeting with A. Gasser to review case and		
8/18/2017	<u>RTH</u>	obtain information for motions	<u>1.75</u>	\$ 656.25
0/10/0015	D. TILL	Case Management - drafting of responsive	0.0	
8/19/2017	<u>RTH</u>	pleading	0.2	\$ 75.00
0/21/2017	DTH	Telephonic with MEA - re motion to stay ULP	2.2	e 925.00
8/21/2017	RTH	- Labor Board	2.2	\$ 825.00
8/23/2017	<u>RTH</u>	review draft -e-mail MEA re draft	0.75	\$ 281.25
0/24/2017	DTH	Telephonic with A Gasser - re recusal of	0.6	e 225.00
8/24/2017	<u>RTH</u>	another judge and case status	<u>0.6</u>	\$ 225.00
		<u>Legal research - review of the township</u> officials of Illinois Laws and duties Handbook		
		for cited authority prepared by Ancel Glink et		
		al on issue of public meetings associated with		
8/24/2017	RTH	the Road District	4.2	\$ 1,575.00
8/24/2017	RTH	Prepare draft on L150 motion to dismiss	1.25	\$ 468.75
8/25/2017	RTH	Received Correspondence	$\frac{1.25}{0.1}$	\$ 37.50
8/25/2017		Prepare resonsive pleading		\$ 843.75
	RTH		2.25 0.25	
8/28/2017	RTH	Telephonic with MEA and AG	$\frac{0.25}{0.2}$	\$ 93.75
8/29/2017	RTH RTH	Received Correspondence	0.2	\$ 75.00
8/30/2017	RTH	Drafted Motion re local 150 MTD	4.5	\$ 1,687.50
8/31/2017	<u>RTH</u>	Received motion from local 150 re ILLRB	0.2	\$ 75.00
			0.5	\$ 187.50
		(
7/1//2017	TO	(not on previous billing) Review and revise	0.5	e 125.00
7/16/2017	TC	memorandum of law and related legal research	0.5	\$ 125.00
8/17/2017	TC	Review Pleadings - draft memo to stay	6.5	\$ 1,625.00
8/18/2017	TC	Review Pleadings - draft memo to stay	<u>6.5</u>	\$ 1,625.00
8/21/2017	<u>TC</u>	Injunction research	<u>6.9</u>	\$ 1,725.00
8/22/2017	<u>TC</u>	<u>Draft and LR</u>	<u>6.67</u>	\$ 1,667.50
8/24/2017	<u>TC</u>	Mot to dismiss	<u>4.5</u>	\$ 1,125.00
8/28/2017	<u>TC</u>	Mot to dismiss Correcspond wih MEA	3.5	\$ 875.00
0/00/004		Mot to dismiss research on seperation of		
8/29/2017	<u>TC</u>	Township road district and TWSHp	<u>1.83</u>	\$ 457.50
0/20/2017	TO	Mot to dismiss research on seperation of	7	Φ 1.750.00
8/30/2017	TC	Township road district and TWSHp Drafting	<u>7</u> <u>8</u>	\$ 1,750.00
8/31/2017	<u>TC</u>	Continue LR Case seaches	8	\$ 2,000.00
0/1/2017	TC	Draft memorandum of law re district separate	7.77	e 1.017.50
9/1/2017	<u>TC</u>	from TWPShp	<u>7.67</u>	\$ 1,917.50
9/14/2017	MEA	Talaam aaida DTH aa maanaan	0.75	¢ 296.25
8/14/2017	<u>MEA</u>	<u>Telcom with RTH re response</u> Correspond with RTH re Local 150 and	0.75	\$ 386.25
8/16/2017	MEA	sweeney	0.75	\$ 386.25
8/22/2017	MEA	Telcom with RTH and AG re review of status		\$ 643.75
0/22/201/	WIEA	Telcolli with K1 ft and AO fe review of status	<u>1.25</u>	3 043.73

		of arguments and edit and review Mot to stay			
		Review motion for dismissal Legal research			
8/24/2017	MEA	drafting re District relationship to Twnship	<u>4.5</u>	\$ 2,3	17.50
		continue Legal Research and drafting of			
8/30/2017	MEA	response	<u>1.83</u>	\$ 94	<u> 12.45</u>
		continue Legal Research and drafting of			
8/31/2017	MEA	response	<u>8</u>	\$ 4,12	<u> 20.00</u>

Total for August billing cycyle	121.45	\$ 40,488.70
Amount Previously Billed		\$ 46,007.15
Amount Previously paid		\$ 46,007.15
Unpaid Prior Balance		\$ -
Amount due		\$ 40,488.70
Average per hour		\$ 333.38

Please remit Payment in the amount of \$40,488.70

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00 Std Rate for MEA= \$515

Std Rate for TC = \$250.00

Std Rate for JC = \$175 (Paralegal) no charges on this billing cycle for JC.

Law Offices of ROBERT T. HANLON & ASSOCIATES, P.C.

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November 1, 2017

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Road District c/o Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17 - CH - 482 Illinois Labor Relations Board Matters Local 150 Claims for other relief

Our File #17-0026

<u>Date</u>	Atty/Pai	ra <u>Item</u>	<u>Hours</u>		Amount
		Preperation of Stay Motion re Vacate matter (not			
9/28/2017	MEA	contained in prior billing)	1.67	\$	860.05
/ - /		Review file status with RTH and Review Gasser affidavit	0.25		120.75
10/5/2017	MEA	and response	0.25	\$	128.75
		Review Local 150 motion asserting misnomer (naming the wrong party in the complaint) review arguments for			
		Motion to vacate RDO, edit same. Research ILLRB Rules			
10/6/2017	MEA	and decisions - send update to RTH	2	\$	1,030.00
		Telcom with RTH re Local 150 response to Motion to			
10/19/2017	MEA	vacate, prepare outline of issues	0.42	\$	216.30
40/20/2047		Review draft reply memorandum to Union opposition to	0.04		175 10
10/20/2017	MEA	motion ot vacate RDO discuss with RTH	0.34	\$	175.10
		Review proposed response to issues for reply to motion			
10/24/2017	NACA	to vacate related legal research and teleconf with A. Gasser	0.34		175.10
10/24/2017	MEA MEA	Registration fee (IARDC)	0.34	\$	379.16
10/25/2017	IVIEA	revise reply to motion to vacate, related legal research		. >	379.10
10/25/2017	MEA	send to rth for finalization	5	\$	2,575.00
10/23/2017	IVILA	Review draft exceptions to RDO, corresponding issues,		,	2,373.00
10/26/2017	MEA	review documents in ILRB case for exceptions.	1	\$	515.00
10/20/2017	IVILA	Review exceptions to RDO, draft additional exceptions			313.00
10/27/2017	MEA	discuss with RTH and TC - guidence re exceptions	0.75	\$	386.25
10/29/2017	MEA	Draft additional exceptions to RDO	0.75	\$	386.25
10/30/2017	MEA	review and edit final draft of exceptions	5.5	\$	2,832.50
,,			5.5	~	_,

10/20/2017	TC	Prepare reply memorandum re motion to vacate related legal research and correspond with MEA	6.17	\$	1,542.50
20, 20, 2027		Continue to prepare reply memorandum re motion to		1	
10/24/2017	TC	vacate IRLB RDO related legal research	7.67	\$	1,917.50
		Review additional documents, continue to prepare reply			
		memorandum re motion to vacate, related legal research,			
10/25/2017	TC	correspond and submit to MEA/RTH	6.05	\$	1,512.50
		Review draft exceptions to RDO Correspond with MEA			
10/26/2017	TC	regarding arguments in ILRB fro case exceptions	3.5	\$	875.00
		review exceptions and supporting brief, draft additional			
10/27/2017	TC	exceptions related research and corresponde with MEA	6.5	\$	1,625.00
de de la constant de		Continue to prepare exceptions and supporting brief,			
100		related legal research, analysis of case law and case file		Ì	
10/29/2017	TC	review	6.83	\$	1,707.50
		Continue to prepare exceptions and supporting brief			
		coordinate related research with MEA and RTH and			
10/30/2017	TC	provide documents to MEA for review	6	\$	1,500.00
10/3/2017	RTH	prepare for court proceedings	2	\$	750.00
10/3/2017	RTH	Review Local 150's authority and read respective cases	5.5	\$	2,062.50
10/4/2017	RTH			1	
10/5/2017	RTH	tel-conference with MEA re gasser affidavit and response	0.25	\$	93.75
10/5/2017	RTH	Meeting with A Gasser	1.75	\$	656.25
		Review Local 150's authority and read respective cases for			
		its purported motion on misnomer (screwed up			
10/6/2017	RTH	complaint by naming Hwy Dept not certified employer)	4.5	\$	1,687.50
		Continue reading authority on misnomer and arguments			
10/9/2017	RTH	of Local 150	3	\$	1,125.00
		Telcom with MEA re Local 150 response to motion to			
10/19/2017	RTH	vacate.	0.42	\$	157.50
		read and compare Local 150 authority for proposition			
10/19/2017	RTH	offered	7.75	\$	2,906.25
10/20/2017	RTH	Telecom with MEA re Local 150	0.33	\$	123.75
10/20/2017	RTH	shepardize cases used in 150 document	4.25	\$	1,593.75
10/24/2017	RTH	Review Drafts	0.5	\$	187.50
10/25/2017	RTH	review draft send comments back to MEA	0.25	\$	93.75
10/26/2017	RTH	telcom A. Gasser re findings on pleadings	0.75	\$	281.25
10/27/2017	RTH	locate additional exceptions confer with MEA	0.5	\$	187.50
10/29/2017	RTH	Review Exceptions to RDO for filing confer with MEA	1.25	\$	468.75
10/30/2017	RTH	Telcom with MEA	0.5	\$	187.50
10/30/2017	RTH	Discussion with A. Gasser	0.75	\$	281.25
10/30/2017	RTH	confer with MEA re changes to Exceptions	0.25	\$	93.75

Please remit Payment in the amount of \$33,276.96

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00.

Std Rate for MEA= \$515

Std Rate for TC = \$250.00

Std Rate for JC = \$175 (Paralegal) no charges on this billing cycle for JC.

Law Offices of ROBERT T. HANLON & ASSOCIATES, P.C.

131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

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December 4, 2017

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Road District c/o Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17 - CH - 482 Illinois Labor Relations Board Matters Local 150 Claims for other relief

Our File #17-0026

<u>Date</u>	Atty/Para	<u>Item</u>	<u>Hours</u>	An	nount
11/14/2017	7 MEA	Review new union Charge with ILRB	0.25	\$	128.75
11/17/201	7 MEA	review with RTH Court action re Local 150 motion to dismiss review and draft reply, review rules for reply to	0.5	\$	257.50
11/19/2001	7 MEA	exceptions -	1	\$	515.00
11/20/2017	7 MEA	Draft and edit reply brief to ILRB	3.5	\$	1,802.50
11/21/2017	7 MEA	review expand and finalize reply brief and arguments	2.75	\$	1,416.25
11/22/2017	7 MEA	Edit final draft of reply legal research bargaining issues	0.75	\$	379.16
11/27/2017	7 MEA	Edit and Expand RTH Motion to file reply or strike local 150 response and confer with RTH	3.5	\$	1,802.50
11/16/2001	7 TC	Review Local 150's response and opposition to exceptions to RDO prepare reply outline, related legal research - nothing in rues says reply prohibited	5.33	\$	1,332.50
11/17/201	.7 TC	continue to prepare reply to Local 150's response, related legal research re dillions rule and correspond with MEA/RTH	7.83	\$	1,957.50
11/18/201	TC	Continue to perpare reply	6.17	\$	1,542.50
11/19/201	.7 TC	continue to perpare reply to local 150 response and related legla research	6.67	\$	1,667.50
11/20/201	.7 TC	continue to prepare reply to Local 150's response, related legal research re dillions rule and correspond with MEA/RTH	6.83	\$	1,707.50

		Receive new Union Charge re alter ego concept of claimed to be filed in abundance of caution to allege a			
11/14/2017	RTH	claim against both the Highway Department and the Road District	0.25	\$	93.75
11/14/2017	RTH	forward new charge to MEA	0.25	\$	93.75
11/14/2017	RTH	contact MEA re latest Charge	0.2	\$	75.00
11/14/2017	RTH	discuss ILRB Rules re reply with MEA	0.5	Ś	187.50
11/15/2017	RTH	prepare for court appearance and review of Dillion's rule for argument - review cases used /relied upon by Local 150	3.5	\$	1,312.50
11/15/2017	RTH	Meeting with A.G.	2	\$	750.00
11/16/2017	RTH	Court Appearance and Argument on Various motions	1.75	\$	656.25
11/16/2017	RTH	contact MEA re court appearance and ruling on MTD, start drafing amended counter-claim	3	\$	1,125.00
11/16/2017	RTH	Telcom with A. Gasser re ruling and next steps	1	\$	375.00
11/17/2017	RTH	Continue to work on amended counter-claim	6.5	\$	2,437.50
11/20/2017	RTH	read and compare Local 150 authority for proposition offered locate discrepencies	7.8	\$	2,925.00
		edit and expand reply associated legal research - re local 150 expansive response well beyond issuess in exceptions and no cross exceptions notify MEA of typical			
11/20/2017	RTH	findings with opposing counsel	5.25	\$	1,968.75
11/20/2017	RTH	she pardize cases used in 150 response	3	\$	1,125.00
11/22/2017	RTH	Edit and File Reply	1.25	\$	468.75
		Receive snarky e-mail correspondence from B. Diemer			
11/22/2017	RTH	with Local 150	0.25	\$	93.75
		File corrected Reply correcting erroneous certificate of			
11/22/2017	RTH	service	0.5	\$	187.50
11/22/2017	RTH	E-mail B. Diemer with local 150	0.25	\$	93.75
	RTH	telcom A. Gasser re findings on pleadings	0.75	\$	281.25
11/22/2017	RTH	Draft Motion to file reply nunc pro tunc or to strike Local 150 response	4	\$	1,500.00
11/25/2017	RTH	legal research ILRB cases re response beyond scope of exceptions and changes to motion to file or strike	6	\$	2,250.00
11/27/2017	RTH	Continue drafting of amendedCounterclaim	6.25	\$	2,343.75
11/27/2017	RTH	Review statutory language for amendment	3.25	\$	1,218.75
11/27/2017	RTH	E-mail MEA draft of Motion to Strike and Telephone with MEA	0.5	\$	187.50
11/27/2017	RTH	Discussion with A. Gasser re motion to strike	0.5	\$	187.50
11/27/2017	RTH	E,mail B Diemer to inform him that I would be filing a document shortly	0.25	\$	93.75
11/27/2017	RTH	Receive Mike's edits re motion	0.25	\$	93.75
11/28/2017	RTH	File document with ILRB - Motion to file or to strike	0.5	\$	187.50
11/28/2017	RTH	make further changes to amended Counter-claim	3.5	\$	1,312.50
Total Due				\$	38,134.16
Total Hours			108.08		
Average Rate			352.8327		dependent tradeum Levil (L. v. 1900) (19 ton), august

Please remit Payment in the amount of \$38,134.16 for this invoice. 11/1/2017 Invoice outstanding balance \$33,276.96
Total Now Due \$71,411.12

Std Rate for RTH = \$400.00 reduced in this billing cycle as a courtesy to A. Gasser to \$375.00.

Std Rate for MEA= \$515

Std Rate for TC = \$250.00

Std Rate for JC = \$175 (Paralegal) no charges on this billing cycle for JC.

Law Offices of ROBERT T. HANLON & ASSOCIATES, P.C.

131 East Calhoun Street Woodstock, IL 60098

Robert Thomas Hanlon

Phone: 815-206-2200 Fax: 815-206-6184

February 9, 2018

Andrew Gasser Algonquin Township Highway Commissioner Algonquin Township Road District Algonquin Township Highway Department 3702 U.S. Highway 14 Crystal Lake, Illinois 60014

Re:

Matter Local 150 v Algonquin Township Road Dist

McHenry County Case #17 - CH - 482 Illinois Labor Relations Board Matters Local 150 Claims for other relief

Our File #17-0026

Date	Atty/Para	<u>Item</u>	<u>Hours</u>	Amount
12/6/20	17 MEA	Legal research bargaining isses	1!	\$ 515.00
12/7/20		Review Direct Dealing cases under Illinois Law Discuss with RTH	1.5	\$ 772.50
12/1/20	17 RTH	amend draft to amended complaint	2.25	\$ 843.75
12/4/20	17 RTH	research direct dealing cases re amended complaint	3.5	\$ 1,312.50
12/4/20	17 RTH	review correspondences discovered and Confer with MEA re direct dealing Review information obtained from computers concerning	1	\$ 375.00
12/6/20	17 RTH	direct dealing	0.25	\$ 93.75
12/6/20	17 RTH	make additional amendments to Amended Complaint	3	\$ 1,125.00
12/7/20	17 RTH	meeting with AGASSER	1.25	\$ 468.75
12/7/20	17 RTH	make changes to Amended Complaint and legal research make revisions to amended complaint and file amended	4.5	\$ 1,687.50
12/7/20	17 RTH	complaint	4	\$ 1,500.00
12/8/20	17 RTH	E-mail from Brian Diemer	0.25	\$ 93.75
12/8/20	17 RTH	E-mail to Brian Diemer	0.25	\$ 93.75
10/22/	017 DTI	review Reynolds v. Jimmy John's Enterprises, LLC, 988	0.75	\$ -
12/23/2	2017 RTH	N.E.2d 984, 992 (Ill. App. 4th 2013)	0.75	\$ 281.25

ate Atty/Para		Atty/Para Item		Amount	
		review Winters v. Wangler, 386 Ill.App.3d 788, 792 (4th			y y , m m q •
12/23/2017	RTH	Dist. 2008).	0.5	\$	187.50
12/23/2017	RTH	review 605 ILCS 5/6-201.7.	0.25	\$	93.75
12/23/2017	RTH	review 605 ILCS 5/6-101	0.25	\$	93.7
		review Hennings v. Centreville Tp., 56 Ill.2d 151, 153-154			
12/23/2017	RTH	(1973)	0.75	\$	281.25
12/23/2017	RTH	review 60 ILCS 1/80-10(a), 60 ILCS 1/235-25.	0.25	\$	93.73
		review 60 ILCS 1/73-5; 605 ILCS 5/6 In context of		,	
12/23/2017	RTH	L150 Motion	0.5	\$	187.50
12/23/2017	RTH	review 5 ILCS 315/7-(1). In context of L150 motion	0.25	\$	93.75
		Review 1997 Ill. Att'y Gen. Op. No. 97-007 cited by			
12/23/2017	RTH	Local 150	0.5	\$	187.56
		Review Amarantos, Hwy Comm. of Northfield Tp. v. The			
1		Boardof Trustees of Northfield Tp., No. 10 CH 38281, p.			
12/23/2017	RTH	3 (Cook County Cir. Ct. July 27, 2011)	0.75	\$	281.25
12/23/2017	RTH	review Dillions rule re Local 150 motion	0.75	\$	281.2
12/20/2011		review Pesticide Public Police Foundation v. Village of			
12/23/2017	RTH	Wauconda, 117 H.2d 9 107, 112 (1987).	0.75	\$	281.2
12/23/2017	RTH	Review 5 ILCS 315/2; 5 ILCS 315/3(b).	0.25	\$	93.7
12/23/2017		review Board of Educ. of Arbor Park School			
12/24/2017	RTH	Dist. No. 145 v. Ballweber, 96 Ill.2d 520, 528 (1983).	0.75	\$	281.23
12/2/12/17	••••	State's			
		Attorney of Johnson County, 21 PERI ¶ 176, fin. 1 (ILRB	İ		
12/24/2017	RTH	SP 2005).	0.75	\$	281.23
12/21/2017		3. 2007			
12/24/2017	RTH	AFSCME, Council 31, 10 PERI ¶ 3031 (IL LLRB 1994).	0.75	\$	281,25
12/24/2017	RTH	Read 10(a)(4)of the IPLRA re 150 argument	0.25	\$	93.7
12/2/12/17		Tri-State Professional Firefighters Union, Local	!		
12/24/2017	RTH	3165, 32 PERI ¶ 153 (IL LRB-SP 2016).	0.5	\$	187,50
12/2//2017	••••	review Troopers Lodge #41, Fraternal Order of Police, 32		1	
12/24/2017	RTH	PERI ¶ 138 (ILRB GC 2016).	0.75	\$	281,2
I Zi Z II ZOI i		ReviewBoard of Education of City of Chicago v. A, C and		1	
12/24/2017	RTH	S, Inc., 131 Ill.2d 428, 452 (1994).	0.5	\$	187.50
12/2/12017		review Gantz v. McHenry County Sheriff's			, no any mandric region reg. 1 1 1000 , 1 1 1 1000 ;
*		Department Merit Comm'n, 296 Ill. App. 3d 335, 339–40			
12/24/2017	RTH	(Ill. App. 2d 1998)	0.75	\$	281.2
12/24/2017	NIII.	Review Board of Education of Peoria School District No.			an a second who have a critical is well
		150 v. Peoria Federation of Support			
		Staff, Security/Policeman's Benevolent & Protective			
12/24/2017	RTH	Association Unit No. 114, 375 Ill. Dec. 744, 761(2013)	0.75	\$	281.2
12/24/2017	RTH	Confer MEA re cases cited by Local 150	0.75	\$	281,2

Date	<u>At</u>	ty/Para	<u>Item</u>	<u>Hours</u>	<u>A1</u>	mount
GR 400 W.C	(C. D. X.		Review Union motion to dismiss counterclaim, discuss			
			objections with TC for response further review of Union			
	1/3/2018	MEA	Exhibits	1.33	\$	684.95
		-	Conference & correspond with MEA, initial review and			
	1/3/2018	TC	reserarch re motion to dismiss	4	\$	1,000.00
	1/4/2018	RTH	Meet with A gasser to discuss Local 150 motion to dismiss	1.75	\$	656.25
* *			Continue opposition to Motion to dismiss (ver. 1 & 2)			
			continue previous legal research and correspond with			
)	1/5/2018	MEA	MEA	1,5	\$	772.50
			Confer with MEA re Motion to dismiss and information			
	1/5/2018	RTH	gathered	0.5	\$	187.50
	1/6/2018	RTH	Confer with Agasser re hearing set of 1/8/2018	0.5	\$	187.50
	,		Review Draft response to Union Motion provide guidence			
	1/6/2018	MEA	to TC re strategy	1!	\$	515.00
			Continue opposition to motion to dismiss ver 3 related legal			
			research(incl purchase of services and case law re case-by-			
	1/6/2018	TC	case determination & confer with MEA	6.67	\$	1,667.50
			Continue opposition to Motion to dismiss (ver. 4-7) related		-	
			legal research including purchase of services terms of	1		
			employment in CBA Road district status Dillons rule and			
!	/7/2018	TC	Confer with MEA	6.5	\$	1,625.00
			Meeting with A gasser and Local 150 claim via IDES and	3		
	1/8/2018	RH	scheduled hearing	2.5	\$	937.50
			Telecom with MEA re Motion and confer update as to			
]	/8/2018	RH	other potential issues to stratgey	1.25	\$	468.75
	10/0010		Telcom with RTH review Draft responses to Union Motion			
1	/8/2018	MEA	to dismiss advise	2	\$	1,030.00
			Continue to develop opposition to Motion to dismiss (vers			
			8-10) related legal research 9Including stripping of power,			
,	/8/2018	TC	multi-year agreements, open meetings and direct dealing and confer with MEA	5.17		1 202 50
	/9/2018	TC MEA	review draft opposition to union motion to dismiss	5.17	\$	1,292.50
1	1912010	MEA	confer with MEA regarding opposition motion and missing	0.33	. 3	169.95
1	/9/2018	RTH	mance of law	0.5:	\$	187.50
1	1712010	KIII	Continue to develop opposition to Motion to dismiss (vers.	0.5		107.50
			11-13) related legal research Including stripping of power,			
			multi-year agreements, open meetings and direct dealing			
1	/9/2018	TC	and confer with MEA	3.5	\$	875.00
	/9/2018	RTH	Prepare for status hearing set for 1-12-18	2	\$	750.00
			Continue to prepare for status hearing - review orders,		+	
1/	12/2018	RTH	case file and outstanding items	2	\$	750.00
			Appear for status in MCHenry co - informed by court			
			administration that forumn changed to Lake county,			
			Contact judge's clerk to appear telephonically Appeared			
1/1	12/2018	RTH	telephonically	1	\$	375.00
1/1	2/2018	RTH	Telephonic with Agasser	1.25	\$	468.75
1/1	2/2018	RTH	Telephonic with MEA	0.5	\$	187.50

Date	Atty/	Para	<u>Item</u>	Hours	Ar	nount
				e a commente de la compansa de la co		
			analyze issues regarding Road District documetns asserted			
1/12	2/2018	MEA	in Unon Motion	0.5	\$	257.50
1/12	2/2018	RTH	Meeting with A Gasser	1	\$	375.00
1/15	5/2018	RTH	legal research into motion to dismiss filed by Local 150	3.25	\$	1,218.75
. 1/16	5/2018	RTH	Continue legal research into motion to dismiss filed by Local 150	2.25	\$	843.75
1/18	3/2018	MEA	review case status with RTH analysis of issues for pleadings	0.75	\$	386.25
1/18	3/2018	RTH	review case status with RTH analysis of issues for pleadings	0.75	\$	281.25
1/22	2/2018	RTH	Review of ILRB decision and ILRB matters	0.5	\$	187.50
1/22	2/2018	MEA	Review of forensic report obtained by Road District	0.17	\$	87.55
1/23	/2018	MEA	Review ILRB decision	0.33	\$	169.95
1/26	/2018	MEA	Review ILRB Investigation letter	0.33	\$	169.95
1/29	/2018	MEA	Review ILRB complaint, file review, consider responses to ILRB inform ILRB RTH is on trial and unavailable to respond until 2/2/18 and outline	2	\$	1,030.00
1/31	/2018	TC	Review letter from investigator campbell, prepare response related legal research	8	\$	4,120.00
	/2018	RTH	Telephonic call MES (late evening) re strategy on ILRB investigative memo while pending complaint.	1	\$	375.00
1/31	/2018	MEA	Telephonic call with RTH re ALG Twp Matters preperation of draft response research for position to be	1	\$	515.00
1/31	/2018	TC	taken	8	\$	2,000.00
			Total Professional Services Rendered		\$	40,562.35

No past due amounts Please remit

\$40,562.35

MATUSZEWICH & KELLY, LLP

101 North Virginia Street, Suite 150 Crystal Lake, Illinois 60014 (815) 459-3120 Telephone (815) 459-3123 Facsimile

ATRD

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204 MAY - 9 2018

May 8, 2018

Attention:

Andrew Gasser, Highway Commissioner-

Re:

Road Vacation - Vacant Lots on Roger Street,

Algonquin, Illinois

Invoice #: 9895

File #: 05-0010.39

CLIENT COSTS

Apr-13-18

Reprographics Charges

5.39

Total Client Costs

\$5.39

Total Fee & Client Costs

\$5.39

Previous Balance

\$555.25

Balance Now Due

\$560.64

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ATRD

May 8, 2018

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204

Attention:

Andrew Gasser, Highway Commissioner

Re:

Miscellaneous

MAY - 9 2018 Invoice #:

9894

File #:

05-0010

DATE	DESCRIPTION	HOURS	
Apr-04-18	Receipt and review of e-mail from highway commissioner regarding allocation of funds to specific line items. Send response to highway commissioner.	0.30	
	Receipt and review e-mail concerning line item for salt storage construction.	0.25	4
Apr-13-18	Correspondance to attorney representing Petitioner to vacate a portion of Rogers Road, send plat to attorney for Petitioner.	0.30	
Apr-26-18	Email from Agnes Pogorzelski re: Rogers Road Vacation, send name of surveyor.	0.20	
	Email from Highway Commissioner re: Duties of Board to Audit bills, send March 13 opinion.	0.20	
	Total Hours	1.25	
	Total Fees	\$281.25	
	Total Fee & Client Costs	:41	\$281.25
	Previous Balance		\$495.00
	Payments Received - Thank You!		\$495.00
	Balance Now Due		\$281.25

APR - 6 2018

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ATRD

April 5, 2018

\$555.25

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204

Attention:	Andrew Gasser, Highway Commissioner	Invoice #: 9772
Re:	Road Vacation - Vacant Lots on Roger Street, Algonquin, Illinois	File #: 05-0010.39
DATE	DESCRIPTION	HOURS
Mar-10-18	Receipt and review of e-mail concerning road vacation, respond to A. Pogonzelski, petitioner's attorney.	0.20
Mar-12-18	Pull Plat of Subdivision at Recorder of Deeds office.	0.50
Mar-13-18	Research provisions re: vacating roads.	0.50
Mar-14-18	Call to attorney A. Pogonzelski re: Rogers Road vacation.	0.25
Mar-22-18	Conference with JPK re: Rogers Road vacation, phone call to A. Pogonzelski.	0.50
Mar-30-18	Obtain information for legal description.	0.50
	Total Hours	2.45
	Total Fees	\$551.25
CLIENT CO	OSTS	
Mar-13-18	Copy of Plat of Subdivision	4.00
,	Total Client Costs	\$4.00

Total Fee & Client Costs

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3702 U.S. Highway 14 Crystal Lake, IL 60014-8204 APR - 6 2018

April 5, 2018

Attention: Andrew

Andrew Gasser, Highway Commissioner

Invoice #:

9771

Re:

Miscellaneous

Balance Now Due

File #:

05-0010

\$495.00

DATE	DESCRIPTION	HOURS	
Mar-08-18	E-mail from Highway Commissioner re: vacation of ROW Killarny Road, advise Highway Commissioner on permanent easement.	0.20	
	E-mail from Highway Commissioner re: Senior Bus Program, research question, send Highway Commissioner and Supervisor information on law providing for the operation of senior transportation programs.	0.75	
Mar-12-18	Call from Highway Commissioner regarding Equipment and Building Fund.	0.25	* 5 *
	Research Equipment and Building Fund uses.	1.00	
	Total Hours	2.20	
	Total Fees	\$495.00	·
8	Total Fee & Client Costs		\$495.00
*	Previous Balance		\$356.25
	Payments Received - Thank You!		\$356.25



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Algonquin Township 3702 U.S. Highway 14 Crystal Lake, Illinois 60014-8204 March 7, 2018

Attention:	Charles Lutzow	Invoice #:	9702
Re:	Gasser v. Lukasik (Case No. 17 CH 435)	File #: 0	5-0009.36
	* *	-1	
DATE	DESCRIPTION	HOURS	
Feb-14-18	Review file.	0.75	
Feb-21-18	Receipt and review of Second Amended Complaint, forward to Supervisor.	0.60	
Feb-22-18	Call from Kelly at CCMSI re: Release, call to opposing counsel re: Release.	0.25	
	Total Hours	1.60	
	Total Fees	\$360.00	
	Total Fee & Client Costs	-	\$360.00
	Previous Balance		\$16,495.00
	Payments Received - Thank You!		\$16,495.00
	Balance Now Due	-	\$360.00

5160.005

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ATRD

March 7, 2018

\$356.25

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204

Balance Now Due

Attention:	Andrew Gasser, Highway Commissioner	Invoice #:	9703
Re:	Miscellaneous	File #:	05-0010
DATE	DESCRIPTION	HOURS	
Feb-05-18	E-mail from Highway Commissioner regarding the Rogers Road Vacation and a second potential road vacation, discussion of personnel matter, email to attorney for Rogers' Road Petitioner requesting Plat of Subdivision.	0.75	
Feb-06-18	Rogers Road Vacation, review letter from Petitioner's attorney, Review GIS, Draft Letter attorney (copy client).	0.30	
Feb-23-18	Receipt and review of e-mail from Highway Commissioner re: FOIA	0.10	
Feb-26-18	Review code Re: expenditure of funds for senior bus program.	0.50	
	Total Hours	1.65	
	Total Fees	\$356.25	3 (1) 10
	TALLE OF CUITAGE	-	0056.05
	Total Fee & Client Costs Previous Balance		\$356.25 \$230.00
*		A.,	
	Payments Received - Thank You!		\$230.00

5160.005



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ATRD

Re:

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204



February 13, 2018

Attention:

Andrew Gasser, Highway Commissioner

Miscellaneous

Invoice #:

9653

File #:

05-0010

DATE	DESCRIPTION	HOURS
Jan-16-18	Receipt of Waiver of Privilege.	0.25
e es	Conference Re: waiver.	0.30
Jan-18-18	Phone call to Allstate Insurance Re: claim.	0.10
Jan-23-18	Receipt and review of e-mails between Highway Commissioner and NWHerald Re: FOIA.	0.10
Jan-26-18	Phone call to Allstate claim department Re: claim filed against road district, drafting of email to A. Gasser, receipt and review of emails from road district.	0.40
* 8	Total Hours	1.15
s *	Total Fees	\$230.00

Total Fee & Client Costs	*	·	*	\$230.00
Previous Balance				\$847.10
Payments Received - Thank You!	*			\$847.10
	- ×	· R		* .

Balance Now Due

\$230.00

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ATRD

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204 January 5, 2018

JAN -8 2018

Attention:

Andrew Gasser, Highway Commissioner

Invoice #:

9574

Re:

DATE

Miscellaneous

DESCRIPTION

File #:

HOURS

05-0010

	Total Fees	\$810.00
	Total Hours	4.05
Dec-29-17	E-mail to and from attorney for Mr. Skoropad Re: Vacation of Road, send reimbursement agreement.	0.20
Dec-20-17	Revise agreement and send agreement concerning contracting to Highway Commissioner with memo regarding the law.	1.20
* * * *	Research current status of Independent Contractor law, review draft Independent Contractor agreement.	1.50
· · · · · · · · · · · · · · · · · · ·	E-mail from Highway Commissioner Re: Budget and Budget hearing.	0.25
Dec-14-17	E-mail to Highway Commissioner Re: Independent Contractor Agreement and road vacation, phone call from Highway Commissioner regarding road vacation and independent contractors.	0.50
Dec-07-17	Review and comment on IGA with Village of Algonquin.	0.30
Dec-04-17	E-mail from Highway Commissioner Re: Tax Objection Lawsuits, e-mail two suits to Highway Commissioner.	0.10
DAIL	DESCRIPTION	HOURS

CLIENT COSTS

Dec-08-17

Publication Fee

37.10

Total Client Costs			\$37.10	
Total Fee & Client Costs Previous Balance			** ·-	\$847.10 \$640.00
Payments Received -	Thank You	!		\$640.00
Balance Now Due	*			\$847.10

5160.005

Previous Balance

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ATRD

December 12, 2017

\$1,410.00

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204

		·	
Attention:	Andrew Gasser, Highway Commissioner	Invoice #:	9516
Re:	Miscellaneous	File #:	05-0010
DATE	DESCRIPTION	HOURS	
Nov-15-17	Receipt and review of e-mail from Highway Commissioner Re: NJPA bid, draft and send opinion to Highway Commissioner Re: NJPA and statutory biding requirements.	0.75	
os.	E-mail from Highway Commissioner Re: Verizon bills.	0.20	
	Various e-mails Re: NJPA contracts.	0.40	**
	Call to Highway Commissioner Re: NJPA, discussion with Executive Director Re: NJPA, research Attorney General opinions.	0.40	
Nov-18-17	Opinion to Highway Commissioner on NJPA.	0.50	*
Nov-20-17	Receipt and review of various e-mails concerning NJPA, respond to e-mail from T. Chapman regarding CMS Joint Purchasing Resolution not being applicable to current Road District purchase.	0.75	
Nov-29-17	Receipt of e-mail concerning FOIA for subpoenas, send response to Highway Commissioner.	0.20	*
uta declaracione en esta esta esta esta esta esta esta esta	Total Hours	3.20	
	Total Face	0.410.00	
	Total Fees	\$640.00	
	Total Fee & Client Costs	-	\$640.00

Balance Now Due

<u>\$640.00</u>

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ATRD

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204 November 3, 2017

NOV 3 2017

Attention:

Andrew Gasser, Highway Commissioner

Invoice #:

9400

Re:

Miscellaneous

File #:

05-0010

DATE	DESCRIPTION	HOURS
Oct-18-17	Receipt and review of e-mail from the Highway Commissioner on status of Lake Killarney.	0.10
	Receipt and review of e-mails Re: Lake Killarney	0.20
Oct-24-17	Call from Highway Commissioner Re: Clerk's concern over the bidding of the Edwards Road Bridge project and contract.	0.30
	Research Edwards Road bid (split 1 hr between Clerk and Road District)	0.50
Oct-25-17	Call County Engineer, multiple calls to IDOT, research Administrative Code and IDOT Bulletins, Call from IDOT General Counsel, discussion with Highway Commissioner, draft letter to client, call to Highway Commissioner Re: status.	4.70
Oct-26-17	Reciept and review of various emails between the Highway Commissioner and Clerk Re: Bid, email to Clerk and Highway Commissioner.	0.40
Oct-30-17	Call to Highway Commissioner Re: Rogers Road Bid opening	0.25
Oct-31-17	E-mails between Highway Commissioner and Clerk Re: Bids.	0.00
	E-mail to Highway Commissioner and Supervisor Re: Bid process.	0.60
	Total Hours	7.05
	Total Fees	\$1,410.00

Total Fee & Client Costs	\$1,410.00
Balance Now Due	\$1,410.00

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ATRD

October 5, 2017

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204

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4	TT	en	T	n	m	•

Andrew Gasser, Highway Commissioner

Invoice #:

9312

Re:

Miscellaneous

File #:

05-0010

DATE	DESCRIPTION	HOURS
Sep-13-17	E-mail from Highway Commissioner Re: non-dedicated roads.	0.10
Sep-20-17	Prepare Request for Bid	0.50
Sep-28-17	Phone conversation with Highway Commissioner Re: levy, research, e-mail to Highway Commissioner.	0.60
	Review audits Re: various accounts.	0.20
	Total Hours	1.40
	Total Fees	\$280.00
	Total Fee & Client Costs OCT - 6 2017	\$280.00
	Previous Balance	\$647.50
	Payments Received - Thank You!	\$647.50
	Balance Now Due	\$280.00

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ATRD 3702 U.S. Highway 14 Crystal Lake, IL 60014-8204 September 8, 2017

Attention: Re:	Andrew Gasser, Highway Commissioner Miscellaneous	Invoice #: 9243 File #: 05-0010
DATE	DESCRIPTION	HOURS
Aug-16-17	Review Hold Harmless Agreement	0.30
	Phone conference with A. Gasser Re: Hold Harmless Agreement, draft agreement to be used as a template for HOA's using salt.	1.50
Aug-18-17	Memo to Highway Commissioner Re: corporate name, review and revise Village of Oakwood Hills IGA.	1.20
Aug-28-17	Review correspondence from Highway Commissioner.	0.20
Aug-31-17	Revisions to IGA.	0.50
	Total Hours	3.70
	Total Fees	\$647.50

Total Fee & Client Costs

Previous Balance

Payments Received - Thank You!

Balance Now Due



\$647.50 \$437.50 \$437.50

\$647.50

5160.005

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ATRD

August 3, 2017

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204

Attention:	Andrew Gasser, Highway Commissioner	Invoice #:	9144 05-0010
Re:	Miscellaneous	File #:	03-0010
DATE	DESCRIPTION	HOURS	
Jul-06-17	Review Commonwealth Edison agreement.	1.00	
Jul-25-17	Receive letter from client requesting opinion for auditor; review all client files; correspondence and emails from client and officers; verify court records; prepare letter to auditors.	1.20	
Jul-31-17	Receipt of e-mail re: FOIA, e-mail to Highway Commissioner and Clerk Re: FOIA response.	0.30	
	Total Hours	2.50	
	Total Fees	\$437.50	
*,	Total Fee & Client Costs		\$437.50
	Previous Balance		\$112.50
	Payments Received - Thank You!		\$112.50
	Balance Now Due	<u>-</u>	<u>\$437.50</u>

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ATRD 3702 U.S. Highway 14

Crystal Lake, IL 60014-8204

June 10, 2017

\$540.00

\$1,704.80

\$1,704.80

Attention:	Highway Commissioner	Invoice #: 8983	
Re:	Miscellaneous	File #: 05-0010	
DATE	DESCRIPTION	HOURS	
May-08-17	Phone conference with client	0.50	
May-10-17	Meeting with client, discussed NDR, Tax Objection ect.	1.00	
May-11-17	Call to and from Highway Commissioner regarding street sweeper.	0.30	
May-12-17	Call from Steve McArdle re: stormwater pipes in subdivision, call Highway Commissioner re: jurisdiction for Stormwater system.	0.25	
	Meeting with client	1.00	
May-23-17	Call from and to Highway Commissioner left voice mail,	0.10	
May-25-17	Call from Highway Commissioner re: FOIA	0.25	
May-26-17	E-mail to and from Highway Commissioner re: Food Pantry.	0.20	
	Total Hours	3.60	
	Total Fees	\$540.00	
	•		

Total Fee & Client Costs

Previous Balance

Payments Received - Thank You!



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ATRD

3702 U.S. Highway 14 Crystal Lake, IL 60014-8204 July 7, 2017

Attention:

Andrew Gasser, Highway Commissioner

Invoice #:

Re:

Miscellaneous

File #:

05-0010

DATE

DESCRIPTION

HOURS

Jun-02-17

Phone conference with Supervisor re: various matters.

0.75

Total Hours

0.75

Total Fees

\$112.50

CLIENT COSTS

Jun-20-17

Refund to Client- Overpayment

1,164.80

Total Client Costs

\$1,164.80

Total Fee & Client Costs

\$1,277.30

Payments Applied - Thank You!

\$1,164.80

Previous Balance

\$540.00

Payments Received - Thank You!

\$540.00

Balance Now Due

\$112.50

R+B 5160.005