

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
SHELBY, ILLINOIS

| | | |
|------------------------------------|---|--------------------|
| FEATHERSTUN, GAUMER, STOCKS, |) | |
| FLYNN AND ECK, LLP |) | |
| Plaintiffs, |) | |
| v. |) | Case No. 20-LM- 22 |
| |) | |
| SHELBY COUNTY and ERICA FIRNHABER, |) | |
| Shelby County Treasurer, |) | |
| Defendants, |) | |

AMENDED COMPLAINT

NOW COMES the law firm of Featherstun, Gaumer, Stocks, Flynn and Eck, LLP, here and after Plaintiffs and in support of its Complaint states:

COUNT I - BREACH OF CONTRACT

1. Edward F. Flynn is a partner in the law firm of Featherstun, Gaumer, Stocks, Flynn and Eck, LLP.
2. Since 2014, Edward F. Flynn has provided legal service for Shelby County on general civil matters primarily focusing upon employment, collective bargaining and contractual matters.
3. This relationship started in 2014 when Edward F. Flynn was approached by members of the Shelby County board to provide these services. After a brief meeting, Shelby County offered to retain Edward F. Flynn for his services.
4. Edward F. Flynn agreed to provide these legal services subject to the approval of the Shelby County State’s Attorney to approve of Edward F. Flynn and Featherstun, Gaumer, Stocks, Flynn and Eck, LLP to provide legal services.

5. Edward F. Flynn and the law firm of Featherstun, Gaumer, Stocks, Flynn and Eck, LLP were approved by the Shelby County State's Attorney to provide legal services; and have fulfilled all of the legal services requested by the Shelby County State's Attorney.

6. Edward F. Flynn advised members of the Shelby County Board Official on multiple occasions that he and his firm provide legal services for Shelby County subject to the approval of the State's Attorney.

7. Edward F. Flynn from 2014 to the present has kept the Shelby County State's Attorney advised of all of the legal services provided.

8. Defendant Shelby County has failed to fulfill their obligation in that Defendants have failed to pay to law firm Featherstun, Gaumer, Stocks, Flynn and Eck, LLP the sum of \$15,443.43; a copy of the unpaid legal bills is attached hereto marked as Exhibit "A".

9. Featherstun, Gaumer, Stocks, Flynn and Eck, LLP have sent repeated demands for the payments that were due for the services that were rendered.

10. Defendants have still failed and/or neglected to fulfill their obligation to satisfy their payment for the services rendered.

11. As of the time of the filing of this Complaint the amount due to Plaintiffs from Defendants is plus prejudgment interest.

WHEREFORE, Plaintiffs pray that judgment be in entered in their favor against Defendants in the sum of \$15,443.42 plus costs and prejudgment interest.

COUNT II – QUANTUM MERUIT

1. Plaintiffs repeat and alleges paragraph 1,2,5-9 from Count I as for paragraphs 2-7 in Count II.

8. Plaintiffs have performed all services requested of them including but not limited to a labor arbitration, in which Plaintiffs represented Defendants on the 5th day of February 2020 in the labor arbitration.

9. The services provided by Plaintiffs for Defendants benefited Defendants in the defense of the claims raised by the FOP union in labor arbitration and all other related employment matters.

10. It is unjust for the Defendants to reap the benefits of Plaintiffs' services without paying Plaintiffs for the services rendered.

WHEREFORE, Plaintiffs prays that judgment be entered in their favor against Defendants in the sum of \$15,444.43 plus costs.

**COUNT III - COMPLAINT FOR ISSUANCE OF WRIT OF MANDAMUS
AGAINST SHELBY COUNTY TREASURER, ERICA FIRNHABER**

NOW COMES, Plaintiffs, Featherstun, Gaumer, Stocks, Flynn and Eck, LLP in support of their Issuance of Writ Mandamus states as follows:

1. This action is brought pursuant to 735 ILCS 5/14-101 et seq., mandamus.
2. Plaintiffs restates and alleges paragraphs 1-9 of Count I as in for paragraphs 2- 10 of Count 3.

11. Erica Firnhaber is the elected Treasurer of Shelby County and upon information the belief is the Shelby County official responsible for issuing checks for the payment of approved bills and expenses of Shelby County.

12. Upon information and belief, the Shelby County Board has approved for payment of all the bills attached hereto sent to Shelby County by Featherstun, Gaumer, Stocks, Flynn and Eck, LLP.

13. Edward F. Flynn has been advised that Erica Firnhaber refuses to pay these legal bills on the basis that Featherstun, Gaumer, Stocks, Flynn and Eck, LLP was hired illegally.

14. Edward F. Flynn has discussed this matter with the Shelby County States Attorney who stated she has advised Erica Firnhaber to pay the legal bills of Featherstun, Gaumer, Stocks, Flynn and Eck, LLP.

15. Erica Firnhaber assisted in providing information and data to Edward F. Flynn for the defense of the Shelby County in the labor arbitration and never advised Edward F. Flynn that she was going to refuse to pay Featherstun, Gaumer, Stocks, Flynn and Eck, LLP for their legal services.

16. Erica Firnhaber on February 14, 2020 and various times in 2019 reached out to Edward F. Flynn seeking legal advice; all of the legal fees for services rendered at the request of Erica Firnhaber in 2019 were paid in full.

17. Erica Firnhaber is exceeding her statutory authority by refusing to pay the legal expenses to Featherstun, Gaumer, Stocks, Flynn and Eck, LLP.

18. Erica Firnhaber's decision to refuse to pay the bills is based on her legal conclusion; without the support of the Shelby County States Attorney, that hiring Featherstun, Gaumer, Stocks, Flynn and Eck, LLP was illegal is tantamount to the unauthorized practice of law.

WHEREFORE, Plaintiffs pray this Court enter a judgment in their favor against Defendant, Erica Firnhaber in the form of a Writ of Mandamus ordering and directing her to pay the attorney's fees of Featherstun, Gaumer, Stocks, Flynn and Eck, LLP, \$15,4443.43 plus costs and prejudgment interest and to pay future legal fees approved the by Shelby County Board.

Featherstun, Gaumer, Stocks, Flynn and Eck, LLP,
Plaintiffs,

By: FEATHERSTUN, GAUMER, STOCKS,
FLYNN & ECK, LLP
Their Attorneys,

By: /s/ Edward F. Flynn

Edward F. Flynn
ARDC No. 06192240
FEATHERSTUN, GAUMER, STOCKS,
FLYNN & ECK, LLP
101 S. State Street, Ste. 240
P. O. Box 1760
Decatur, IL 62525-1760
Telephone: (217) 429-4453
E-mail: eflynn@decatur.legal

STATE OF ILLINOIS)
) SS.
COUNTY OF MACON)

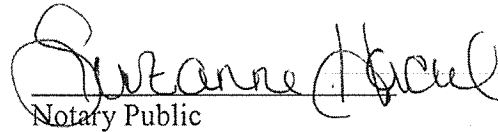
RULE 222(b) AFFIDAVIT

I, Edward F. Flynn, being duly sworn under oath, do hereby affirm that the damages for which recovery is sought in the cause herein does not exceed \$50,000 that Exhibit "A" attached hereto set for the Plaintiffs claims; and that the undersigned will testify under oath this allegations set forth in this Complaint are true and accurate to the best of his knowledge.

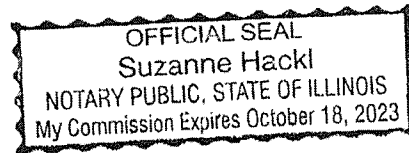
Further affiant sayeth not.

/s/ Edward F. Flynn

Subscribed and sworn to before me this 18th day of May, 2020.


Notary Public

Edward F. Flynn
ARDC No. 06192240
FEATHERSTUN, GAUMER, STOCKS,
FLYNN & ECK, LLP
101 S. State Street, Ste. 240
P. O. Box 1760
Decatur, IL 62525-1760
Telephone: (217) 429-4453
E-mail: eflynn@decatgur.legal



Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810
P. O. Box 1760
Decatur, IL 62525-1760
Telephone: 217-429-4453
Fax: 217-425-8892

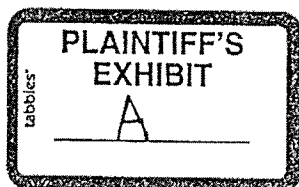
Shelby County
Shelby County
Attention: Erica Firnhaber
Shelbyville, IL 62565

Billing Summary

| Date of Bill | Matter No. Matter Description | Prior Balance | Payments Received | New Billing | Current Balance |
|---------------|--|------------------|-------------------|-------------------|--------------------|
| <hr/> | | | | | |
| Shelby County | | | | | |
| 4/20/2020 | 3958 Shelby County - General | 1,904.50 | 0.00 | \$780.00 | \$2,684.50 |
| 4/20/2020 | 4635 Shelby County - Negotiations - 2018 - County Emplo | 92.50 | 92.50 | \$77.99 | \$77.99 |
| 4/20/2020 | 4636 Shelby County - Negotiations - 2018 - Sheriff | 12,681.94 | 0.00 | \$0.00 | \$12,681.94 |
| | | <u>14,678.94</u> | <u>92.50</u> | <u>\$857.99</u> | <u>\$15,444.43</u> |
| | | | | Total Amount Due: | <u>\$15,444.43</u> |

* - Prior Balance/Payment not included in the Current Balance

** - Current Balance does not include all prior balances and payments received



Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

January 20, 2020

Invoice No. 8989

Shelby County
Attention: Dave Cruitt
Shelbyville, IL 62565

Client Number: 2410 Shelby County
Matter Number: 3958 Shelby County - General
For Services Rendered Through 12/31/2019.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|------------------------|-------------------|--|--------------|---------------|
| 12/10/2019 | RJM | Research FOIA requirements to determine if request by Treasurer to police department is valid and enforceable. | 0.30 | \$55.50 |
| 12/17/2019 | EFF | meeting with Gina regarding issues arising between elected officials | 2.40 | \$444.00 |
| 12/20/2019 | EFF | Meeting with Brian; review his research; Conferred with Gina and Erica | 3.00 | \$555.00 |
| 12/20/2019 | BDE | confer w/ EFF re legal question on county officer discretion to expend funds appropriated, ministerial nature of treasurer's duty in said circumstances; legal research regarding same and drafted memorandum to EFF re same | 2.50 | \$462.50 |
| 12/31/2019 | EFF | Draft correspondence to client regarding arbitration status | 0.25 | \$46.25 |
| Billable Hours / Fees: | | | 8.45 | \$1,563.25 |

Timekeeper Summary

Timekeeper EFF worked 5.65 hours at \$185.00 per hour, totaling \$1,045.25.

Timekeeper BDE worked 2.50 hours at \$185.00 per hour, totaling \$462.50.

Timekeeper RJM worked 0.30 hours at \$185.00 per hour, totaling \$55.50.

Client Number: 2410
Matter Number: 3958

1/20/2020
Page: 2

Payment Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|-------------|---------------------------------------|---------------|
| 1/10/2020 | Check Number 071426 against Inv# 8766 | (S111.00) |
| | Total Payments Received: | (S111.00) |

Current Invoice Summary

| | | |
|-----------------------|-------------------|-------------------------|
| Prior Balance: | \$111.00 | |
| Payments Received: | (S111.00) | Last Payment: 1/10/2020 |
| Unpaid Prior Balance: | <u>\$0.00</u> | |
| Current Fees: | \$1,563.25 | |
| Advanced Costs: | \$0.00 | |
| TOTAL AMOUNT DUE: | <u>\$1,563.25</u> | |

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.
Please include Invoice Number with Payment

Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

February 25, 2020

Invoice No. 9313

Shelby County
Attention: Erica Firnhaber
Shelbyville, IL 62565

Client Number: 2410 Shelby County
Matter Number: 3958 Shelby County - General
For Services Rendered Through 1/31/2020.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|---|------------------------|--------------------|
| 1/21/2020 | EFF | put together chart regarding comparable county population, household income, medial home values and per capita income | 1.25 | \$243.75 |
| | | | Billable Hours / Fees: | 1.25 \$243.75 |

Timekeeper Summary

Timekeeper EFF worked 1.25 hours at \$195.00 per hour, totaling \$243.75.

Current Invoice Summary

| | |
|--------------------------|-------------------|
| Prior Balance: | \$1,563.25 |
| Payments Received: | \$0.00 |
| Unpaid Prior Balance: | \$1,563.25 |
| Current Fees: | \$243.75 |
| Advanced Costs: | \$0.00 |
| TOTAL AMOUNT DUE: | \$1,807.00 |

Thank You for Letting Us Serve You.
NOW ACCEPTING ALL MAJOR CREDIT CARDS
Please include Invoice Number with Payment
Payment Due Upon Receipt.

Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

March 18, 2020

Invoice No. 9433

Shelby County
Attention: Erica Firnhaber
Shelbyville, IL 62565

Client Number: 2410 Shelby County
Matter Number: 3958 Shelby County - General
For Services Rendered Through 2/29/2020.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|--|-------------------------------|----------------------------|
| 2/6/2020 | EFF | Draft opinion letter regarding new union legislation | 0.50 | \$97.50 |
| | | | <u>Billable Hours / Fees:</u> | <u>0.50</u> <u>\$97.50</u> |

Timekeeper Summary

Timekeeper EFF worked 0.50 hours at \$195.00 per hour, totaling \$97.50.

Current Invoice Summary

| | |
|-----------------------|-------------------|
| Prior Balance: | \$1,807.00 |
| Payments Received: | \$0.00 |
| Unpaid Prior Balance: | <u>\$1,807.00</u> |
| Current Fees: | \$97.50 |
| Advanced Costs: | \$0.00 |
| TOTAL AMOUNT DUE: | <u>\$1,904.50</u> |

Thank You for Letting Us Serve You.

NOW ACCEPTING ALL MAJOR CREDIT CARDS

Please include Invoice Number with Payment

Payment Due Upon Receipt.

Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

February 25, 2020

Invoice No. 9313

Shelby County
Attention: Erica Firnhaber
Shelbyville, IL 62565

Client Number: 2410 Shelby County
Matter Number: 3958 Shelby County - General
For Services Rendered Through 1/31/2020.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|---|-------------------------------|-----------------------------|
| 1/21/2020 | EFF | put together chart regarding comparable county population, household income, medial home values and per capita income | 1.25 | \$243.75 |
| | | | <u>Billable Hours / Fees:</u> | <u>1.25</u> <u>\$243.75</u> |

Timekeeper Summary

Timekeeper EFF worked 1.25 hours at \$195.00 per hour, totaling \$243.75.

Current Invoice Summary

| | |
|-----------------------|-------------------|
| Prior Balance: | \$1,563.25 |
| Payments Received: | \$0.00 |
| Unpaid Prior Balance: | <u>\$1,563.25</u> |
| Current Fees: | \$243.75 |
| Advanced Costs: | \$0.00 |
| TOTAL AMOUNT DUE: | <u>\$1,807.00</u> |

Thank You for Letting Us Serve You.
NOW ACCEPTING ALL MAJOR CREDIT CARDS
Please include Invoice Number with Payment
Payment Due Upon Receipt.

Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

April 20, 2020

Invoice No. 9566

Shelby County
Attention: Erica Firnhaber
Shelbyville, IL 62565

Client Number: 2410 Shelby County
Matter Number: 3958 Shelby County - General
For Services Rendered Through 3/31/2020.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|--|-------------------------------|-----------------------------|
| 3/4/2020 | EFF | edit closing argument brief | 1.50 | \$292.50 |
| 3/5/2020 | EFF | Internet Arbitration - finalize brief for internet arbitration | 2.50 | \$487.50 |
| | | | <u>Billable Hours / Fees:</u> | <u>4.00</u> <u>\$780.00</u> |

Timekeeper Summary

Timekeeper EFF worked 4.00 hours at \$195.00 per hour, totaling \$780.00.

Client Number: 2410
Matter Number: 3958

4/20/2020
Page: 2

Current Invoice Summary

| | |
|-----------------------|-------------------|
| Prior Balance: | \$1,904.50 |
| Payments Received: | \$0.00 |
| Unpaid Prior Balance: | <u>\$1,904.50</u> |
| Current Fees: | \$780.00 |
| Advanced Costs: | \$0.00 |
| TOTAL AMOUNT DUE: | <u>\$2,684.50</u> |

Thank You for Letting Us Serve You.
NOW ACCEPTING ALL MAJOR CREDIT CARDS
Please include Invoice Number with Payment
Payment Due Upon Receipt.

Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

April 20, 2020

Invoice No. 9567

Shelby County
Attention: Dave Cruitt
Shelbyville, IL 62565

Client Number: 2410 Shelby County
Matter Number: 4635 Shelby County - Negotiations - 2018 - County Emplo
For Services Rendered Through 3/31/2020.

Cost Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> | <u>Check No.</u> |
|-------------|--|--------------------|------------------|
| 3/11/2020 | VENDOR:UPS; INVOICE#:0000F3752R100; DATE:3/11/2020 - Courier Charges-UPS - Greg Szuter IL Payee: UPS | \$49.53 | 42434 |
| 3/11/2020 | VENDOR:UPS; INVOICE#:0000F3752R100; DATE:3/11/2020 - Courier Charges-UPS Greg Szuter OH Payee: UPS | \$28.46 | 42434 |
| | | <u>Total Costs</u> | <u>\$77.99</u> |

Payment Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> | |
|-------------|---------------------------------------|---------------------------------|------------------|
| 3/15/2019 | Check Number 068960 against Inv# 6299 | (\$92.50) | |
| | | <u>Total Payments Received:</u> | <u>(\$92.50)</u> |

Client Number: 2410
Matter Number: 4635

4/20/2020
Page: 2

Current Invoice Summary

| | | |
|-----------------------|------------------|-------------------------|
| Prior Balance: | \$92.50 | |
| Payments Received: | <u>(\$92.50)</u> | Last Payment: 3/15/2019 |
| Unpaid Prior Balance: | \$0.00 | |
| Current Fees: | \$0.00 | |
| Advanced Costs: | <u>\$77.99</u> | |
| TOTAL AMOUNT DUE: | <u>\$77.99</u> | |

Thank You for Letting Us Serve You.
NOW ACCEPTING ALL MAJOR CREDIT CARDS
Please include Invoice Number with Payment
Payment Due Upon Receipt.

Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

February 17, 2020

Invoice No. 9125

Shelby County
Attention: Dave Cruitt
Shelbyville, IL 62565

Client Number: 2410 Shelby County

Matter Number: 4636 Shelby County - Negotiations - 2018 - Sheriff

For Services Rendered Through 1/31/2020.

Fees

| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
|-------------|-------------------|---|--------------|---------------|
| 1/17/2020 | EFF | send FOIA request to 12 counties to prepare comparables for the arbitration; review Union and employer final proposals; meeting with Bruce Cannon; review insurance documentation | 5.50 | \$1,072.50 |
| 1/22/2020 | EFF | preparation for arbitration multiple conferences with Union attorney regarding comparable counties review and summarize the contracts from Moultrie, Christian, Douglas Counties and the employer and Union proposals | 4.00 | \$780.00 |
| 1/23/2020 | EFF | meeting with Shelby County Negotiations Committee; meeting with Treasurer; meeting with County Clerk, multiple conferences with Union attorney | 4.20 | \$819.00 |
| 1/24/2020 | EFF | prepare for arbitration - regarding comparable counties review and examine the population, median household income, median home value, median family income and per capital income for Bond, Christian, Clark, Clay, Dewitt, Douglas, Edgar, Fayette, Logan, Moultrie, and Piatt Counties vs Shelby County. REview and calculate FY 18, 19 & 20 wages in comparable counties for deputies and correction officers at base, and start of 5 year, 10 year, 15 and 20 year | 6.00 | \$1,170.00 |
| 1/26/2020 | EFF | review and edit pre hearing arbitration stipulation Drafted correspondence to FOP attorney; draft correspondence to FOP attorney with reply to request for information | 0.75 | \$146.25 |

Continued On Next Page

Client Number: 2410
 Matter Number: 4636

2/17/2020
 Page: 2

| | | | | |
|-----------|-----|---|------|----------|
| 1/29/2020 | RJM | Meet with EFF to discuss exhibits needed for labor arbitration trial on 2/5/20. Draft/revise salary comparison exhibits for deputies, corrections, and dispatch employees. | 3.00 | \$585.00 |
| 1/29/2020 | EFF | edit joint stipulation (2) conferences with FOP counsel | 1.20 | \$234.00 |
| 1/30/2020 | RJM | Draft exhibit of "civilian" employees with salaries comparable to non-union employees with similar job duties. Draft/revise exhibits comparing salaries of deputies, corrections, and dispatch employees. Phone call to Moultrie, Clay, Fayette & Douglas Counties to determine whether their dispatch employees were subject to a collective bargaining agreement. | 4.00 | \$780.00 |
| 1/31/2020 | RJM | Meet with EFF to finalize exhibits for labor arbitration trial on 2/5/20. Draft/revise exhibits based on comments and suggestions from EFF. | 3.50 | \$682.50 |
| 1/31/2020 | EFF | review and evaluate the exhibits and wage calculations in the exhibits ; Conferred with Sheriff and Rob; draft final offer proposal | 2.70 | \$526.50 |

Billable Hours / Fees: 34.85 \$6,795.75

Timekeeper Summary

Timekeeper EFF worked 24.35 hours at \$195.00 per hour, totaling \$4,748.25.

Timekeeper RJM worked 10.50 hours at \$195.00 per hour, totaling \$2,047.50.

Payment Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> |
|--------------------------|---------------------|-------------------|
| 10/30/2019 | Check Number 070918 | (\$629.00) |
| Total Payments Received: | | <u>(\$629.00)</u> |

Client Number: 2410
Matter Number: 4636

2/17/2020
Page: 3

Current Invoice Summary

| | | |
|-----------------------|-------------------|--------------------------|
| Prior Balance: | \$629.00 | |
| Payments Received: | (\$629.00) | Last Payment: 10/30/2019 |
| Unpaid Prior Balance: | <u>\$0.00</u> | |
| Current Fees: | \$6,795.75 | |
| Advanced Costs: | \$0.00 | |
| TOTAL AMOUNT DUE: | <u>\$6,795.75</u> | |

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.
Please include Invoice Number with Payment

Featherstun, Gaumer, et al.

Federal Tax ID: 37-0561810

P. O. Box 1760

Decatur, IL 62525-1760

Telephone: 217-429-4453

Fax: 217-425-8892

March 18, 2020

Invoice No. 9434

Shelby County
Attention: Dave Cruitt
Shelbyville, IL 62565

Client Number: 2410 Shelby County
Matter Number: 4636 Shelby County - Negotiations - 2018 - Sheriff
For Services Rendered Through 2/29/2020.

| <u>Fees</u> | | | | |
|-------------|-------------------|--|--------------|---------------|
| <u>Date</u> | <u>Timekeeper</u> | <u>Description</u> | <u>Hours</u> | <u>Amount</u> |
| 2/3/2020 | RJM | Prepare comparable county map exhibits for trial. Prepare exhibits for trial related to recreational activities offered in comparable counties. Draft/revise wage comparison exhibits for trial. | 1.50 | \$292.50 |
| 2/3/2020 | EFF | Multiple conferences with Union attorney; exchange emails with Arbitrator; prepare trial notebook and arguments | 8.40 | \$1,638.00 |
| 2/4/2020 | RJM | Calculate hours worked per year by deputies using a 4 on/4 off schedule. Draft wage comparison exhibit for deputies using hourly wages instead of annual wages. Calculate employer wages for wage comparison exhibits with cost of insurance subtracted from wages paid. Review/proofread exhibit packet to be used at trial. Meet with EFF to discuss comments and suggestions on exhibit packet. | 3.00 | \$585.00 |
| 2/4/2020 | EFF | multiple emails with Union attorney; Telephone conference with Gina; Telephone conference with Erica(2); finalize arbitration proposal; prepare oral argument | 6.75 | \$1,316.25 |
| 2/5/2020 | EFF | Attend labor arbitration | 6.50 | \$1,267.50 |
| 2/19/2020 | EFF | Conferred with Union attorney regarding arbitrator bill and briefing issue; draft correspondence to client regarding bill | 0.25 | \$48.75 |
| 2/23/2020 | EFF | Review Union exhibits and AFSCME Contract; review County proposal and exhibits; dictate first draft of Brief | 3.60 | \$702.00 |

Continued On Next Page

Client Number: 2410
Matter Number: 4636

3/18/2020
Page: 2

Billable Hours / Fees: 30.00 \$5,850.00

Timekeeper Summary

Timekeeper EFF worked 25.50 hours at \$195.00 per hour, totaling \$4,972.50.

Timekeeper RJM worked 4.50 hours at \$195.00 per hour, totaling \$877.50.

Cost Detail

| <u>Date</u> | <u>Description</u> | <u>Amount</u> | <u>Check No.</u> |
|-------------|--|---------------|------------------|
| 2/6/2020 | VENDOR:UPS; INVOICE#:0000F3752R050; DATE:2/6/2020 - Courier Charges-UPS Overnight to James Daniels Payee: UPS | \$36.19 | 42330 |
| | Total Costs | \$36.19 | |

Current Invoice Summary

| | |
|-----------------------|-------------|
| Prior Balance: | \$6,795.75 |
| Payments Received: | \$0.00 |
| Unpaid Prior Balance: | \$6,795.75 |
| Current Fees: | \$5,850.00 |
| Advanced Costs: | \$36.19 |
| TOTAL AMOUNT DUE: | \$12,681.94 |

Thank You for Letting Us Serve You.
NOW ACCEPTING ALL MAJOR CREDIT CARDS
Please include Invoice Number with Payment
Payment Due Upon Receipt.