

# Morrison, Marquis, Campbell, Lareau & Weng

1515 4th Avenue, Suite 301  
Rock Island, IL 61201

## INVOICE

Invoice # 244  
Date: 12/31/2020  
Due On: 01/30/2021

City of Rock Island  
1528 3rd Avenue  
Rock Island, IL 61201

### 00001-City of Rock Island

### FOIA & Subpoena

Type	Date	Notes	Quantity	Rate	Total
Service	12/01/2020	Communications with client representative regarding response to request; prepare draft; follow-up communications.	0.80	\$140.78	\$112.62
Service	12/03/2020	Receive and review inquiry from client representative regarding attorney request; respond to same.	0.60	\$140.78	\$84.47
Service	12/09/2020	Communications with client representative regarding subpoena for personnel records; discussion regarding possible motion to quash subpoena.	0.60	\$140.78	\$84.47
Service	12/17/2020	Receive and review documents produced in response to subpoena; review course of dealings with subpoena and FOIA response; draft long memorandum to DGM regarding same and regarding next steps.	2.90	\$140.78	\$408.26
Service	12/22/2020	Confer with DGM regarding extension language and problematic disclosure previously made.	0.60	\$140.78	\$84.47
Service	12/30/2020	Conference call with client representative regarding unavailability of responsive records, his conversation with requester, and options for response; revisions to letter to requester; communications with client representative regarding further revisions to accommodate time needed to gather documents.	1.20	\$140.78	\$168.94
				<b>Quantity Subtotal</b>	<b>6.7</b>
				<b>Subtotal</b>	<b>\$943.23</b>

**00002-City of Rock Island****Chavez wrongful death**

Type	Date	Notes	Quantity	Rate	Total
Service	12/02/2020	work on discovery responses to 4th and 5th request to produce	1.00	\$140.78	\$140.78
Service	12/09/2020	Receive and review voluminous supplemental production; repeated efforts to effect digital receipt of same.	1.20	\$140.78	\$168.94
Service	12/13/2020	work on responses to Plaintiff's 4th and 5th requests for production	1.50	\$140.78	\$211.17
Service	12/14/2020	Conference with DGM regarding next steps to re-pleading third party complaint.	0.30	\$140.78	\$42.23
Service	12/15/2020	Receive and review answer to affirmative defenses; receive and review motion to strike fifth affirmative defense.	0.50	\$140.78	\$70.39
Service	12/21/2020	Secure copies of third-party defendant transcripts; review same to identify fact issues for amending third-party claim.	1.80	\$140.78	\$253.40
Service	12/22/2020	Work on second amended third party complaint.	1.00	\$140.78	\$140.78
Expense	12/23/2020	Chavez vs. City of Rock Island Depositions of Klossing, Littlejohn and Bowers	1.00	\$921.75	\$921.75
<b>Quantity Subtotal</b>					<b>7.3</b>
<b>Subtotal</b>					<b>\$1,949.44</b>

**00005-City of Rock Island****CED matters**

Type	Date	Notes	Quantity	Rate	Total
Service	12/02/2020	review, edit and modify grant agreement regarding funds for covid relief small businesses	1.50	\$140.78	\$211.17
Service	12/03/2020	Review documents related to 80 shore acres and then telephone conference regarding 80 shore acres	1.00	\$140.78	\$140.78
Service	12/03/2020	telephone conference regarding property purchased at tax sale by city with former owner claiming right to possession	0.50	\$140.78	\$70.39

Service	12/03/2020	research on removing trespasser from city owned abandoned property	0.50	\$140.78	\$70.39
			<b>Quantity Subtotal</b>		<b>3.5</b>
			<b>Subtotal</b>		<b>\$492.73</b>

**00011-City of Rock Island**

**MUNICES**

Type	Date	Notes	Quantity	Rate	Total
Service	12/02/2020	Searched Tax Exempt Properties on City Assessment Notices.	0.50	\$71.44	\$35.72
Service	12/09/2020	Prepare and file Notice of Registration of Judgment 2523-2525 6th Avenue	0.50	\$71.44	\$35.72
Service	12/09/2020	Prepare Notice of Registration of Administrative Judgment	0.50	\$71.44	\$35.72
Service	12/10/2020	Prepare Certificate of Judgment and file accordingly. 2523-2525 6th Street	0.50	\$71.44	\$35.72
Service	12/10/2020	Prepare Certificate of Judgment 2519 29 1/2 Street.	0.50	\$71.44	\$35.72
Expense	12/11/2020	Certified Mail Municipal Judgments: 2023 11th Street and 1509 6th Avenue.	2.00	\$6.90	\$13.80
Service	12/11/2020	Prepare two Certified Letters; 2023 11th Street and 1509 6th Avenue.	0.50	\$71.44	\$35.72
			<b>Quantity Subtotal</b>		<b>3.0</b>
			<b>Subtotal</b>		<b>\$228.12</b>

**00013-City of Rock Island**

**Cleveland ADA pool**

Type	Date	Notes	Quantity	Rate	Total
Service	12/01/2020	Prepare proof draft of motion in limine; forward same to DGM for review.	4.20	\$140.78	\$591.28
Service	12/07/2020	Communications with DGM regarding motion in limine; review medical records actually produced; revise and file motion; receive and review order regarding pretrial conference.	1.60	\$140.78	\$225.25

Service	12/09/2020	Receive digital version of supplemental records production; long struggles to make file transfer work.	0.60	\$140.78	\$84.47
Service	12/11/2020	telephone conference with attorney Doak	0.30	\$140.78	\$42.23
Service	12/14/2020	Prepare for and appear for executive session to discuss settlement prospects.	1.00	\$140.78	\$140.78
Service	12/15/2020	Legal research regarding motion in limine and local rules regarding reply briefs; conference with DGM regarding seeking leave of court to reply.	1.20	\$140.78	\$168.94
Service	12/21/2020	work on matters related to Case including time line proposed settlement and related matters	2.75	\$140.78	\$387.15
Service	12/21/2020	Conference with DGM regarding pre-trial preparation; revisions to executive session information.	0.50	\$140.78	\$70.39
Service	12/22/2020	Conference with DGM regarding executive session; conference call with plaintiff's counsel regarding possible settlement.	0.50	\$140.78	\$70.39
Service	12/23/2020	Work on settlement, with emphasis on non-disclosure terms.	0.80	\$140.78	\$112.62
			<b>Quantity Subtotal</b>		<b>13.45</b>
				<b>Subtotal</b>	<b>\$1,893.50</b>

## 00015-City of Rock Island

### Forrest Robb pothole

Type	Date	Notes	Quantity	Rate	Total
Service	12/08/2020	Communications with counsel for MidAmerican regarding affidavit.	0.40	\$140.78	\$56.31
			<b>Quantity Subtotal</b>		<b>0.4</b>
				<b>Subtotal</b>	<b>\$56.31</b>

## 00018-City of Rock Island

### Rock Island Realty

Type	Date	Notes	Quantity	Rate	Total
Service	12/02/2020	finalized responses to Rock Island Realty discovery requests	1.25	\$140.78	\$175.98

Service	12/02/2020	Detailed review and revision of discovery documents.	1.00	\$140.78	\$140.78
			<b>Quantity Subtotal</b>		<b>2.25</b>
			<b>Subtotal</b>		<b>\$316.76</b>

## 00025-City of Rock Island

### Estrada & Joy

Type	Date	Notes	Quantity	Rate	Total
Expense	12/16/2020	Check to McCorkle Litigation Services, Inc for Depositions.	1.00	\$206.50	\$206.50
			<b>Subtotal</b>		<b>\$206.50</b>

## 00021-City of Rock Island

### Danielle Herber slip and fall on ped mall

Type	Date	Notes	Quantity	Rate	Total
Service	12/15/2020	Telephone conference with plaintiff's counsel regarding forthcoming amended complaint and regarding discovery matters.	0.30	\$140.78	\$42.23
			<b>Quantity Subtotal</b>		<b>0.3</b>
			<b>Subtotal</b>		<b>\$42.23</b>

## 00019-City of Rock Island

### Beverly McAninch police chase

Type	Date	Notes	Quantity	Rate	Total
Service	12/02/2020	Prepare 20 Subpoena Ducas Tecum and envelopes for service. McAninch vs. City	2.25	\$71.44	\$160.74
Service	12/02/2020	Receive and review executed HIPAA order; coordinate issuance of subpoenas.	0.30	\$140.78	\$42.23
Service	12/08/2020	Revisions to subpoenas to health care providers.	0.20	\$140.78	\$28.16
Service	12/09/2020	Scan and file 19 Subpoena's for issuance with County.	1.50	\$71.44	\$107.16

Expense	12/10/2020	Postage for 19 Subpoena's, regarding McAninch case.	1.00	\$12.65	\$12.65
Service	12/10/2020	Received issued subpoena's from court put together with Hippa order and mailed.	0.50	\$71.44	\$35.72
Service	12/16/2020	Receive and review voluminous documents responsive to subpoenas to health care providers.	0.80	\$140.78	\$112.62
Expense	12/23/2020	McAninch vs. City of Rock Island: Advance Radiology Statement for Billing records	1.00	\$20.00	\$20.00
Service	12/23/2020	Receive and review subpoena response from medical billing agency.	0.20	\$140.78	\$28.16
Expense	12/28/2020	Unity Point Health. Medical Records Beverly McAninch	1.00	\$72.70	\$72.70
Service	12/30/2020	Receive and review subpoena response.	0.20	\$140.78	\$28.16
<b>Quantity Subtotal</b>					<b>5.95</b>
<b>Subtotal</b>					<b>\$648.30</b>

## 00696-City of Rock Island

### Public Works matters

Type	Date	Notes	Quantity	Rate	Total
Service	12/01/2020	Communications with client representative regarding contract for services; correspondence to vendor regarding same; exchange executed contracts.	0.80	\$140.78	\$112.62
Service	12/04/2020	Review draft submission for surrendering exemption.	0.40	\$140.78	\$56.31
Service	12/06/2020	Send feedback to client regarding draft exemption surrender.	0.20	\$140.78	\$28.16
Service	12/11/2020	telephone conference with Mike Bartels, Jason Upton and Lisa Perry on DNR lease cancellation and additional conversation about emergency snow removal contract possibilities	0.40	\$140.78	\$56.31
Service	12/14/2020	Communications regarding lease termination letter.	0.30	\$140.78	\$42.23
<b>Quantity Subtotal</b>					<b>2.1</b>
<b>Subtotal</b>					<b>\$295.63</b>

**00697-City of Rock Island****Governance matters**

Type	Date	Notes	Quantity	Rate	Total
Expense	12/03/2020	Certified Mail on 10 Electoral Objection Petitions.	1.00	\$77.00	\$77.00
Service	12/03/2020	Work with David G. Morrison on Objectors Petition to Electoral submissions. Prepared letters, Certified Cards, Envelopes, copies, telephone conference with process server, reviewed documents made changes and correlated documents for serve.	3.00	\$71.44	\$214.32
			<b>Quantity Subtotal</b>		<b>3.0</b>
			<b>Subtotal</b>		<b>\$291.32</b>

**00583-City of Rock Island****Demolition Matters**

Type	Date	Notes	Quantity	Rate	Total
Service	12/30/2020	Prepared Demolition lien and created billing sheet for properties. 2205 12th Street.	0.50	\$71.44	\$35.72
Service	12/30/2020	Prepare Demolition liens and billing statement on Demolitions. 1924 9th Street	0.50	\$71.44	\$35.72
Service	12/30/2020	Prepare Demolition liens and billing statement on Demolitions. 1518 14th Street	0.50	\$71.44	\$35.72
Service	12/30/2020	Prepare Demolition liens and billing statement on Demolitions. 611 5th Street	0.50	\$71.44	\$35.72
Service	12/30/2020	Prepare Demolition liens and billing statement on Demolitions. 516 14th Avenue	0.50	\$71.44	\$35.72
Service	12/30/2020	Prepare Demolition liens and billing statement on Demolitions. 1221-16th Street	0.50	\$71.44	\$35.72
Service	12/30/2020	Prepare Demolition liens and billing statement on Demolitions. 1700 8th Street	0.50	\$71.44	\$35.72
Service	12/30/2020	Prepare Demolition liens and billing statement on Demolitions. 1706 8th Street	0.50	\$71.44	\$35.72
Expense	12/30/2020	Record Demolition Lien 2205 12th Street	1.00	\$65.00	\$65.00
Expense	12/30/2020	Record Demolition Lien 1924 9th Street	1.00	\$65.00	\$65.00

Expense	12/30/2020	Record Demolition Lien 1518 14th Street	1.00	\$65.00	\$65.00
Expense	12/30/2020	Record Demolition Lien 611 5th Street	1.00	\$65.00	\$65.00
Expense	12/30/2020	Record Demolition Lien 516 14th Avenue	1.00	\$65.00	\$65.00
Expense	12/30/2020	Record Demolition Lien 1700 8th Street	1.00	\$65.00	\$65.00
Expense	12/30/2020	Record Demolition Lien 1706 8th Street	1.00	\$65.00	\$65.00
Expense	12/30/2020	Record Demolition Lien 1221 16th Street	1.00	\$65.00	\$65.00
				<b>Quantity Subtotal</b>	<b>4.0</b>
				<b>Subtotal</b>	<b>\$805.76</b>

**00584-City of Rock Island Attn: Human Resources**

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Type	Date	Notes	Quantity	Rate	Total
Service	12/09/2020	Department head meeting	0.60	\$140.78	\$84.47
Service	12/15/2020	Dept head meeting and telephone conference with John Gripp thereafter	0.80	\$140.78	\$112.62
Service	12/21/2020	research on PSEBA and RI code of ordinances on PSEGA	0.50	\$140.78	\$70.39
Service	12/21/2020	composed amended proposed findings of fact and decision on objections previously drafted to include new matters related to objector offering proof of residency of candidate from the hearing on Dec. 16, 2020	2.00	\$140.78	\$281.56
				<b>Quantity Subtotal</b>	<b>3.9</b>
				<b>Subtotal</b>	<b>\$549.04</b>

**00703-City of Rock Island**

**Bankruptcy Proceedings:**

Type	Date	Notes	Quantity	Rate	Total
Service	12/22/2020	Emails to Caitlin, Jen, Christine, Nichole, regarding Flores Bankruptcy. Hold open for responses.	0.15	\$71.44	\$10.72
				<b>Quantity Subtotal</b>	<b>0.15</b>

**Subtotal            \$10.72**

## 00713-City of Rock Island

### Augustana sewer case

Type	Date	Notes	Quantity	Rate	Total
Service	12/01/2020	Contact expert; communications with all counsel regarding order.	0.40	\$140.78	\$56.31
Service	12/07/2020	Research potential experts; emails and telephone conferences with several of them.	1.20	\$140.78	\$168.94
Service	12/08/2020	Communications with two potential experts regarding background review.	0.60	\$140.78	\$84.47
Service	12/09/2020	Assemble televising data and forward same to possible experts for review.	0.70	\$140.78	\$98.55
Service	12/15/2020	telephone conference with Doug Erickson regarding engineering issues related to case.	0.50	\$140.78	\$70.39
Service	12/15/2020	telephone conference with City Manager regarding issue of pipe maintenance and repair program in city since 2003.	0.50	\$140.78	\$70.39
Service	12/15/2020	Call in advance of conference call with attorney Hoey; conference call with new expert and all City counsel; follow-up telephone conference with City manager and other client representatives regarding expert's questions.	1.80	\$140.78	\$253.40
Service	12/17/2020	telephone conference with multiple public works employees and proposed expert regarding sewer	1.00	\$140.78	\$140.78
Service	12/17/2020	Receive and review updated case management order; conference call with expert and City representatives regarding background facts and next steps.	0.80	\$140.78	\$112.62
			<b>Quantity Subtotal</b>		<b>7.5</b>
			<b>Subtotal</b>		<b>\$1,055.85</b>

## 00718-City of Rock Island Foreclosures

### Foreclosures

Type	Date	Notes	Quantity	Rate	Total
Service	12/22/2020	Researched 9 Foreclosure files. Found Sheriff's deed	1.00	\$71.44	\$71.44

for one property, email to Caitilin, Jen, Nichols and Christine.

Expense	12/22/2020	Pulled Foreclosure documents from Lareo.	1.00	\$1.00	\$1.00
			<b>Quantity Subtotal</b>		<b>1.0</b>
			<b>Subtotal</b>		<b>\$72.44</b>

## 00722-City of Rock Island

### McGhee v. Mumma and Shappard

Type	Date	Notes	Quantity	Rate	Total
Service	12/07/2020	Check appellate court to find ruling on criminal case; review same; prepare and file status report with federal court regarding same.	0.80	\$140.78	\$112.62
Service	12/08/2020	Receive and review order from court regarding further status report.	0.20	\$140.78	\$28.16
			<b>Quantity Subtotal</b>		<b>1.0</b>
			<b>Subtotal</b>		<b>\$140.78</b>

## 00725-City of Rock Island

### O'Neil motorcycle crash

Type	Date	Notes	Quantity	Rate	Total
Service	12/02/2020	Receive and review discovery from co-defendant to plaintiff.	0.40	\$140.78	\$56.31
Service	12/17/2020	Receive and review notice of changed address.	0.20	\$140.78	\$28.16
			<b>Quantity Subtotal</b>		<b>0.6</b>
			<b>Subtotal</b>		<b>\$84.47</b>

## 00732-City of Rock Island

### Liquor Commission matters

Type	Date	Notes	Quantity	Rate	Total
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Service	12/04/2020	prepare meeting minutes for liquor commission hearings, prepare agenda, review police reports, motion to reconsider and prepare notices of hearing for liquor commission hearings	3.90	\$140.78	\$549.04
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**Quantity Subtotal**                      **3.9**

**Subtotal**                                      **\$549.04**

## 00752-City of Rock Island

### Aaron Brown

Type	Date	Notes	Quantity	Rate	Total
Service	12/23/2020	Receive and review motion to dismiss and order granting dismissal of case against the City.	0.20	\$140.78	\$28.16

**Quantity Subtotal**                      **0.2**

**Subtotal**                                      **\$28.16**

## 00761-City of Rock Island

### Electoral Board matters

Type	Date	Notes	Quantity	Rate	Total
Service	12/02/2020	Review of election law/objection statutes and materials related to objections, hearings and notice procedures	1.00	\$140.78	\$140.78
Service	12/02/2020	received objections to election petitions, reviewed statute and objection and cases related to objection process	1.75	\$140.78	\$246.37
Service	12/02/2020	prepare documents regarding election objections drafted Call notices, compiled packets for hearing arrange for court reporter	4.25	\$140.78	\$598.32
Service	12/03/2020	put together information for electoral board with analysis for each separate objection for delivery to electoral board members for their review prior to hearing	3.20	\$140.78	\$450.50
Service	12/04/2020	research using electoral board handbook to prepare for hearing and help set up agenda and matters related to electoral board hearing scheduled for Dec. 9 2020	2.75	\$140.78	\$387.15
Service	12/06/2020	Review objection materials filed with clerk and begin work on summary of issues brought up in objections to	4.50	\$140.78	\$633.51

		petitions			
Service	12/09/2020	Research on objection to election petitions, prepare 3 ring binder for hearing with case annotations and references to standard decisions from elections manual and reviewed other procedural and related matters in manual.	6.20	\$140.78	\$872.84
Service	12/10/2020	Election Board hearing arrived 30 minutes prior to hearing to set up and prepare for hearing	2.50	\$140.78	\$351.95
Service	12/10/2020	Research on Election law, review decisions posted on web site of Chicago election board which were relevant to 15 total objections for two hearings in the afternoon. telephone conference with Attorney who presented on election law questions at CLE event hosted by Ancel Glink.	3.50	\$140.78	\$492.73
Service	12/12/2020	research Chicago Election Board, Illinois Compiled statutes on issues of non-precedent nature of board decisions case law on residency requirements, code sections setting out candidacy requirements and the cases set forth in the annotations to each of those statutes	3.20	\$140.78	\$450.50
Service	12/12/2020	compose draft ruling for Gilbert v. Westerfield 7 individual rulings combined into on ruling with 7 parts (one part for each different category from the 14 objections) for dispositional hearing.	3.90	\$140.78	\$549.04
Service	12/13/2020	composed draft ruling which can be modified at hearing of electoral commission.	1.00	\$140.78	\$140.78
Service	12/15/2020	completed proposed rulings and findings check box form electoral board draft for hearings in afternoon	1.75	\$140.78	\$246.37
Service	12/16/2020	appear at city council chambers to set up for electoral board hearings and hearings on objections by electoral board.	2.50	\$140.78	\$351.95
Service	12/16/2020	Review detailed draft orders; conferences with DGM regarding best practices and operation of applicable ordinances.	1.00	\$140.78	\$140.78
Service	12/16/2020	research statutes and case law regarding information presented at hearing aaaaaaa	3.75	\$140.78	\$527.93
Service	12/16/2020	Research on issues presented at electoral board hearing	3.75	\$140.78	\$527.93
Service	12/17/2020	Conference with DGM regarding unauthorized practice of law issues; research applicable supreme court rules; telephone conferences to ISBA and ARDC regarding same.	1.40	\$140.78	\$197.09
Service	12/22/2020	composed proposed findings and reviewed materials, case law and motion received from Attorney Stengle's office	2.75	\$140.78	\$387.15

Service	12/22/2020	Conference with DGM regarding decision and grounds for same.	0.40	\$140.78	\$56.31
			<b>Quantity Subtotal</b>		<b>55.05</b>
			<b>Subtotal</b>		<b>\$7,749.98</b>
			<b>Quantity Total</b>		<b>125.25</b>
			<b>Total</b>		<b>\$18,410.31</b>

**Detailed Statement of Account**

**Current Invoice**

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
244	01/30/2021	\$18,410.31	\$0.00	\$18,410.31
			<b>Outstanding Balance</b>	<b>\$18,410.31</b>
			<b>Total Amount Outstanding</b>	<b>\$18,410.31</b>

Please make all amounts payable to: David G. Morrison

Please pay within 30 days.