

Kutsunis & Weng, P.C.  
 1515 4th Avenue, Suite 301  
 Rock Island, IL 61201

Invoice submitted to:  
 City of Rock Island  
 1528 Third Avenue  
 Rock Island, IL 61201

April 01, 2014

In Reference To: Monthly billing  
 Invoice #20511

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
2/25/2014 Legal Assistant: Call from Mary Chappell regarding various matters; ordered title work on 914 & 922 - 3rd Ave. regarding donation to ARC	0.50 62.68/hr	31.34
2/26/2014 Legal Assistant: William Slack - research file for Answer to Complaint; check service requirements, etc. - MW	0.50 62.68/hr	31.34
Legal Assistant: Meeting with Ted Kutsunis and Jeff Eder regarding various real estate matters	1.00 62.68/hr	62.68
Legal Assistant: Call from Mary Chappell regarding lease with Botanical Center for Children's Garden and provided her with some lease forms	0.20 62.68/hr	12.54
Botanical Center: Meet with Mary Chappel and director of Botanical Center; draft License Agreement	1.50 123.30/hr	184.95
Riverstone: Meet with Jeff Eder to discuss property	1.00 123.30/hr	123.30
Granado: Attend Citation hearing	0.50 123.30/hr	61.65
2/27/2014 Price Properties, LLC: Phone conference with Thomas Thomas	0.20 123.30/hr	24.66
Big Island RCD: Phone conference with Jeff Lang regarding response to Attorney Doak's letter on FOIA documents	0.20 123.30/hr	24.66
Legal Assistant: Phone conferences with Mary Chappell; research and preparation of a Resolution Providing for the Sale of Real Estate Owned by the City regarding 1730 - 8th Ave.	1.50 62.68/hr	94.02

	<u>Hrs/Rate</u>	<u>Amount</u>
2/27/2014 Legal Assistant: Receipt and review of Summons and Verified Complaint to Foreclose Mortgage (U.S. Bank v. Haynes, City of R.I., et al., 1009 - 14 1/2 St.); Laredo search regarding same and email to Randy Hollerud regarding same	0.50 62.68/hr	31.34
2/28/2014 Legal Assistant: Joan Fiame - email letter to City regarding Joan Fiame bankruptcy; research on bankruptcy; call to Attorney Dale Haake, attorney for debtor - MW	0.50 62.68/hr	31.34
Ridgewood Business Park: Meet with Jeff Eder and Dena of CED to discuss state funding grants; review Grant Agreements; draft comments to CED staff	2.80 123.30/hr	345.24
ARC: Meet with Jeff Eder and Mary Chappel to discuss file	0.20 123.30/hr	24.66
Rosenthal Bankruptcy: Discuss bankruptcy file with Bruce Crowe and Tom Ayers	0.20 123.30/hr	24.66
Liquor Commission/Platinum Club: Prepare for Liquor Commission hearing; attend hearing	1.30 123.30/hr	160.29
Legal Assistant: Receipt of copies of Notes and amounts due regarding Roessler foreclosure; completion of Answer and Affidavit of Amount Due	0.50 62.68/hr	31.34
Legal Assistant: Preparation of Release of Water/Sewer Lien regarding 561 - 20th Ave.		35.00
3/3/2014 Liquor Commission/Platinum Club: Draft Order from 2/28/14 hearing	0.80 123.30/hr	98.64
Sierra Morgan: Review file to prepare for depositions; attend depositions of plaintiff, Officer Brooks, and witnesses	4.70 123.30/hr	579.51
3/4/2014 Rosenthal Bankruptcy: Draft Motion to Extent Time to File Objections	0.40 123.30/hr	49.32
BIRCD: Meet with R. McMonagle to discuss Chad Larson FOIA response	0.50 123.30/hr	61.65
Legal Assistant: Rosenthal bankruptcy - conference with Ted Kutsunis regarding file; prepare and file Motion to Extent Time - MW	1.50 62.68/hr	94.02
Review Class Action Notice for Municipal Derivatives Class Action law suit; memo to Cinty Partchert	0.40 123.30/hr	49.32
Rosenthal bankruptcy: Review and revise draft of Motion to Extend Time to File Objection	0.40 123.30/hr	49.32
Legal Assistant: Receipt and review of Notice of Hearing to Approve Report of Sale; review file - City has special assessment; call to American Bank inquiring as to payment of same - not paid; call to Codilis & Associates	0.50 62.68/hr	31.34

		<u>Hrs/Rate</u>	<u>Amount</u>
	regarding city (Capital One Bank v. James Johnson, City of R.I., et al., 1715 - 86th Ave. W.)		
3/5/2014	Legal Assistant: Rosenthal bankruptcy - prepare Amended Motion to Extend Time and file; conference with Ted Kutsunis on file regarding Trustee filing to abandon the property - MW	1.00 62.68/hr	62.68
	Legal Assistant: Receipt and review of emails regarding legal title holder of Southwest Library Branch; Laredo search regarding same - too old for copy of deed; order Limited Title Search from Meridian Title; phone conference with Mary Chappel regarding an agreement that may have been signed	0.50 62.68/hr	31.34
	Vince Thomas: Legal research issues of dismissal of Complaint for Injunctive Relief	1.60 123.30/hr	197.28
	Schulz Citation: Appearance at Citation hearing; cause continued due to conflict because Judge Darrow was one of the respondent's attorneys	0.70 123.30/hr	86.31
	Legal Assistant: Receipt and review of Summons and Complaint to Foreclose Mortgage (Federal National Mortgage Assn. v. Courtney Almanza, City, et al., 1217 - 35th St.)	0.10 62.68/hr	6.27
3/6/2014	Legal Assistant: Secure City Manager's signature on Mark Mueller Purchase Agreement; brief conference with Jeff Eder regarding same; conference with Kim Reda regarding HUD closing and payment of final water/sewer bills at closing	0.80 62.68/hr	50.14
	Legal Assistant: Forwarded MUNICES lien, judgment information, and Notice of Ch. 7 bankruptcy to Steve Nelson regarding Rosenthal	0.20 62.68/hr	12.54
3/7/2014	Legal Assistant: Anderson bankruptcy - reviewed bankruptcy filing Ch. 7; send Notice to Mary Chappell, Kim Reda, and Randy Hollerud; regarding property located at 4519 - 9th Street, City Limits building/1428 - 34th Ave. - MW	0.50 62.68/hr	31.34
	Legal Assistant: Henderson bankruptcy - reviewed bankruptcy Ch. 13 Plan; send Notice to Mary Chappell, Kim Reda, and Randy Hollerud, regarding property located at 1021 - 14 1/2 St. - MW	0.50 62.68/hr	31.34
	Rosenthal bankruptcy: Draft and file Complaint objecting to discharge of MUNICES fine	1.20 123.30/hr	147.96
	Legal Assistant: Laredo search for copy of mortgage; email to Randy Hollerud regarding copy of Note and current balance due on Almanza foreclosure	0.30 62.68/hr	18.80
3/8/2014	Vince Thomas: Legal research; draft Brief in Opposition to Motion for Judgment on the pleadings	2.70 123.30/hr	332.91

	<u>Hrs/Rate</u>	<u>Amount</u>
3/10/2014 Legal Assistant: Ramirez - prepare subpoenas and had them issued at Federal Court; determine mileage and witness fees; transmittal letter to process service - MW	1.00 62.68/hr	62.68
Legal Assistant: Fiamme bankruptcy - reviewed file; secure Judgment of Dissolution and Separation Agreement from Clerk of the Court; phone conference with Attorney Hany Khoury's office and Attorney Steve Marsh's office; email and call to Mary Chappell regarding claim - MW	1.50 62.68/hr	94.02
Legal Assistant: Heinemen bankruptcy - email to Mary Chappell with update on case - MW	0.20 62.68/hr	12.54
Legal Assistant: Rosenthal bankruptcy - prepare subpoenas and mail; phone conference with Bankruptcy Court; conference with Ted Kutsunis; filed Certificate of Service with Court; prepare Motion to Withdraw Motion to Extend Time - MW	3.00 62.68/hr	188.04
Legal Assistant: Meeting with Mary Chappell regarding bankruptcy cases - MW	1.00 62.68/hr	62.68
Golden Citation: Meet with Tom Ayers and Bruce Crowe to discuss certified Judgment on 1324 - 4th Ave.; review file; email to Tom Ayers	0.50 123.30/hr	61.65
Blackhawk TV Demolition: Review demolition contract; phone conference with John Lester to discuss contract issues	0.30 123.30/hr	36.99
Hookah House: Meeting with Tom Mayers and Bruce Crowe to discuss Code issues	0.30 123.30/hr	36.99
Vince Thomas: Review and revise draft of Opposition to Motion for Judgment on the pleadings	0.20 123.30/hr	24.66
Dollar General: Discuss closing matter with legal assistant	0.20 123.30/hr	24.66
Rosenthal bankruptcy: Review documentation from Bankruptcy Court	0.30 123.30/hr	36.99
Price Properties, LLC: Exchange emails with attorney for Price Properties and Thomas Thomas to discuss Purchase Agreement	0.40 123.30/hr	49.32
Legal Assistant: Sale to DG Partners, LLC - receipt of email from Meridian Title regarding closing scheduled for March 11, 2014; prepare deed, Limited Power of Attorney and Alta Loan Statement and delivered same to City for signatures; call to Tim O'Brien regarding same; calls and emails to and from Meridian Title, buyer's agents, GIS Dept., regarding new parcel status, and Inspections regarding address regarding Dollar General; call to Board of Review regarding tax exempt status; email to Jeff Eder, Thomas Thomas, Mary Chappell and others regarding closing and funds needed	2.70 62.68/hr	169.24

	<u>Hrs/Rate</u>	<u>Amount</u>
3/11/2014 Mill Creek South Slough: Review status email from Attorney Harsch	0.30 123.30/hr	36.99
Rosenthal bankruptcy: Review and revise draft of Motion to Withdraw Motion to Extend Time	0.20 123.30/hr	24.66
Liquor Commission: Phone conference with Rich Landi regarding new Augie's license application	0.20 123.30/hr	24.66
LRC Development: Phone conference with attorney for LRC regarding status of Hill & Valley lease	0.40 123.30/hr	49.32
Legal Assistant: Dickerson bankruptcy - prepare subpoenas; secure issuance of subpoenas by Federal Court; transmittal letter to process server; email to Ken Flaxman, Deanna Levson address not good - MW	1.50 62.68/hr	94.02
Legal Assistant: MUNICES - call from Bruce Crowe regarding status of City v. Ryco Limited Co. (1035 - 17th St.), and review of file	0.30 62.68/hr	18.80
Legal Assistant: Call from Mary Chappell regarding appraisal back on 1730 - 8th Ave.; complete Resolution for approval by Council, and forward to Mary; phone conference with Jeff Eder regarding same; call to appraiser regarding item missing on appraisal	0.60 62.68/hr	37.61
Legal Assistant: Ridgewood Business Park - receipt and review of proposed letter from Attorney Frank Nowinski regarding extension of Temporary Construction Easement and forwarded same to Dena Grunewald for submission to the EDA	0.20 62.68/hr	12.54
Legal Assistant: Sale to DG Partners, LLC - call to Meridian Title regarding no tax proration being taken for 2014; call to and from Board of Review regarding exempt status of property; preparation of PTAX and email to Don Reichert regarding transfer of funds needed for closing; receipt of confirmation of funds transfer, prepare check for closing and having deed and tax declaration delivered to Meridian Title; receipt of final HUD and signing same on behalf of City; have Notice of Assignment of Sale contract signed by City Manager and forward same to Meridian	1.40 62.68/hr	87.75
3/12/2014 Legal Assistant: Anderson bankruptcy - phone conference with Don Reichert regarding food and alcohol tax; Ch. 7 bankruptcy cannot file claim; this is a priority claim if assets become available - MW	0.30 62.68/hr	18.80
Legal Assistant: Henderson bankruptcy - emailed Kim Reda; need printout of billing to attach to claim for Southern District of Iowa - MW	0.10 62.68/hr	6.27
Legal Assistant: Robert Anderson bankruptcy - prepare Reaffirmation Agreement; conference with Mary Chappell; sent Reaffirmation Agreement to Attorney Buckrop for signatures - MW	1.00 62.68/hr	62.68
Price Properties, LLC: Review draft Agreement; conference call with Price's attorney to discuss amendments thereto	1.50 123.30/hr	184.95

	<u>Hrs/Rate</u>	<u>Amount</u>
3/12/2014 Liquor Commission: Draft revision to Ch. 3-9 of Code of Ordinances	0.80 123.30/hr	98.64
Legal Assistant: Work on proposed letter agreement regarding the future purchase of property for development; call to Jeff Eder regarding same and emailing a copy to Jeff for review	0.80 62.68/hr	50.14
Legal Assistant: MUNICES - email from Tom Ayers regarding okay to release Certificate of Judgment against Golden regarding 1324 - 4th Ave.; call to Bi-State to confirm unpaid Court costs; call to Tom Ayers regarding accumulated out-of-pocket expenses with confirmation email	0.40 62.68/hr	25.07
3/13/2014 Legal Assistant: Ramirez: Meeting with process server regarding subpoenas and Julius Nettles, witness; research property address and email Ken Flaxman and Heidi Weller - MW	0.50 62.68/hr	31.34
Legal Assistant: MUNICES - call to and from Attorney Brett Marshall regarding signed Amended Stipulation regarding MUNICES judgment against Ryco Limited Co. regarding 1035-37 - 17th Street; receipt of fully signed Amended Stipulation and forwarded same to Bruce Crowe	0.40 62.68/hr	25.07
Legal Assistant: Phone conference with Mary Chappell regarding 2011 tax bill for 1204 - 2nd Avenue that didn't get paid and title to adjoining properties	0.70 62.68/hr	43.88
3/14/2014 Legal Assistant: Receipt and review of Limited Title Search regarding Southwest Library Branch and forwarded same to Ted Kutsunis, Mary Chappell, and Jeff Eder	0.80 62.68/hr	50.14
Legal Assistant: Phone conferences with Jill Pauley at Meridian Title Co. regarding changes to deed to RIEC from 2013; call to Amy at Growth; make changes to deed	1.00 62.68/hr	62.68
3/17/2014 Casey Hunter: Review file and prepare Response to Motion to Stop Summary Judgment, and Motion to Strike; review Federal Rule of Civil Procedure 56 - DGM	1.80 123.30/hr	221.94
Legal Assistant: File documents with Federal Court (Motion to Strike Plaintiff's Motion to Stop Summary Judgment - MW	0.30 62.68/hr	18.80
Trotter Construction: Discuss file update with David Morrison	0.20 123.30/hr	24.66
Fiame Bankruptcy: Review file; discuss filing claim with legal assistant	0.40 123.30/hr	49.32
Legal Assistant: MUNICES - call from Bruce Crowe regarding Keith Broderick found in his home deceased (930 - 4th Ave.)	0.20 62.68/hr	12.54
3/18/2014 Legal Assistant: Henderson bankruptcy - email Kim Reda for City's bill for Proof of Claim; prepare and file Proof of Claim in Southern District of Iowa	0.50 62.68/hr	31.34

	<u>Hrs/Rate</u>	<u>Amount</u>
3/18/2014 Attend General Liability Committee meeting	1.50 123.30/hr	184.95
Vince Thomas: Legal research issues of incompatibility of office	1.00 123.30/hr	123.30
Price Properties: Emails from City Manager; email to attorney for Price Properties regarding discussion of contract issues	0.40 123.30/hr	49.32
3/19/2014 Attend General Liability Committee meeting - DGM	1.50 123.30/hr	184.95
Legal Assistant: Flame bankruptcy - conference with Ted Kutsunis; conference with Attorney Steve Andich regarding adversary proceeding; file Proof of Claim in Bankruptcy Court - MW	1.50 62.68/hr	94.02
3/20/2014 Griffen: Appearance at mandatory Case Management Conference - MJW	0.40 123.30/hr	49.32
Oaks: Appearance at mandatory Case Management Conference - MJW	0.40 123.30/hr	49.32
3/21/2014 Casey Hunter: Research on Exclusionary Rule regarding whether evidence suppressed in criminal case can be used in a civil trial and collateral estoppel - DGM	3.50 123.30/hr	431.55
3/22/2014 Bender: Legal research on propriety of Request to Admit Facts in Administrative Law proceeding	1.20 123.30/hr	147.96
3/23/2014 Landing at Schweibert Park: Review emails from Ben Griffith; review attached documents; phone conference with Ben Griffith	0.50 123.30/hr	61.65
Bender: Legal research on issue of sufficiency of service of NOV.; draft Objections to Request to Admit and Brief	2.50 123.30/hr	308.25
3/24/2014 Review FOIA request for several police reports; review reports; email to Wayne Sharer	1.10 123.30/hr	135.63
Legal Assistant: Preparation of Water/Sewer Lien Release (1336 - 41st St.), and Weed Cutting Lien Release (1020 - 14th Ave.); secure City Clerk's signature and deliver to Finance for recording		60.00
Legal Assistant: Black Hawk College - email to Attorney Allison VanNatta regarding delay in closing with Black Hawk College and phone conference with Jeff regarding same	0.20 62.68/hr	12.54
Legal Assistant: Call from Inspections regarding foreclosure in Federal Court - Deutsch Bank v. Shawn Biswell, et al, regarding Sheriff's Sale of 2908 - 22nd Ave.; search of Judicia; call to Circuit Clerk and call to Federal Court Clerk, who bid in at sale 3/14/14	0.50 62.68/hr	31.34

	<u>Hrs/Rate</u>	<u>Amount</u>
3/24/2014 Legal Assistant: Watchtower - emails from and to Margot Wickman, attorney for Price Properties, regarding finalization of agreement this week	0.20 62.68/hr	12.54
3/25/2014 Dickerson: Deposition preparation and attend deposition of Deanne Levson; attempted depositions of Rodney McBride and Julius Hughes (did not appear) - DGM	2.25 123.30/hr	277.43
Review litigation files; draft summaries of status to Thomas Thomas	0.80 123.30/hr	98.64
Sierra Morgan: Phone conference with plaintiff's attorney regarding school record of plaintiff; review file; draft status to Thomas Thomas	0.50 123.30/hr	61.65
Liquor Commission: Legal research, Moline Ordinances; email to Ben McCreedy	0.50 123.30/hr	61.65
Bender: Draft Objections to Request to Admit	0.50 123.30/hr	61.65
Legal Assistant: Preparation of Answer to Complaint to Foreclose Mortgage and Affidavit of Amount Due regarding Federal National Mortgage v. Almanza, City, et al., 1217 - 35th Street	0.80 62.68/hr	50.14
Legal Assistant: Further email from Inspections regarding information on foreclosure of 2908 - 22nd Ave.; phone conference with Sharon and Captain Marlier regarding was a sheriff's sale conducted - no; further call to Kerin at Federal Court regarding who conducts foreclosure sales at the Federal level; call to Chrystal Gregory, Forefeitures and Foreclosures, in Springfield regarding who conducted sale	0.50 62.68/hr	31.34
Legal Assistant: Black Hawk College - receipt and review of responsive email from Dr. Baynum, President of Black Hawk College, regarding closing; call to and from Dena Grunewald to secure proof of all payments by City; call to Chuck Meyer, Project Manager, regarding same; further review of purchase agreement regarding closing contingencies; respond to Dr. Baynum	1.10 62.68/hr	68.95
3/26/2014 Almanza foreclosure: Review and execute Answer to Complaint for Foreclosure	0.20 123.30/hr	24.66
Bender: Review and revise draft of Objections to Request to Admit	0.30 123.30/hr	36.99
Hill & Valley: Review emails from Jeff Eder; review Development Agreement of 2/14	0.40 123.30/hr	49.32
Review emails from Thomas Thomas on litigation report; review Vince Thomas file; review Bender file; revise draft of litigation summary; email to Jeff Lang; phone conference with Ray Harsch	1.20 123.30/hr	147.96

	<u>Hrs/Rate</u>	<u>Amount</u>
3/27/2014 Phone conference with employment lawyer Pappas regarding pending matter on retired employees; phone conference with Patrick Doherty regarding Payne claim; review litigation summary from R. McMonagle; email final draft to Ben McCreedy	0.60 123.30/hr	73.98
3/28/2014 Legal Assistant: Nazareus bankruptcy - phone conference with Tracy Ott regarding parking tickets; letter to Randy, Mary & Kim regarding bankruptcy; phone conference with Attorney Bingar, debtor's attorney (hold all collections until discharge) - MW	0.50 62.68/hr	31.34
Legal Assistant: Leifler bankruptcy - email to Kim, Mary, and Randy; phone conference with Mike Williams' office, second mortgage (this is not the City, but Illinois Housing & Development); Laredo search for mortgage - MW	0.50 62.68/hr	31.34
Legal Assistant: Ambort bankruptcy - review file and put accounting into T-Value - MW	0.20 62.68/hr	12.54
Dickerson: Two emails to Ken Flaxman; phone conference with Heidi Weller, State's Attorney's Office, regarding possible settlement; must have a demand to take to Council - DGM	0.50 123.30/hr	61.65
Bender: Phone conference with Attorney Jim Eagle regarding Objections to Request to Admit	0.20 123.30/hr	24.66
Police & Fire Commission: Review officer disciplinary letter from Lt. Landi	0.10 123.30/hr	12.33
Dickerson: Review emails from David Morrison and Ken Flaxman; discuss file with David Morrison	0.30 123.30/hr	36.99
Sierra Morgan: Attend Case Management Conference at Courthouse	1.00 123.30/hr	123.30
Legal Assistant: Call to Casey in GIS regarding request by Tom Ayers for a parcel number for the new Dollar General property and call to Tom Ayers regarding same	0.20 62.68/hr	12.54
Legal Assistant: Short conference with Tom Ayers regarding information on foreclosure and ownership of 2908 - 22nd Ave.; call to Crystal Gregory at Federal Marshall's Office regarding who conducted foreclosure sale; search of the Judicial Sales Corporation regarding sale; call from Bruce Crowe regarding City posted 2x2 Notice of Demolition; preparation of Affidavit of Posting to be signed by Bruce; left voice message for Tom Ayers - first mortgage holder, Deutsche Bank National Trust Company bid in at foreclosure sale 3/14/14	1.30 62.68/hr	81.48
3/30/2014 Dickerson: Prepare for depositions of Officer Ramirez and Rodney McBride - DGM	0.70 123.30/hr	86.31
Schweibert Boat Dock: Review Grant Contract with State; email to Ben Griffith	1.00 123.30/hr	123.30

	<u>Hrs/Rate</u>	<u>Amount</u>
3/31/2014 Dickerson: Meeting with Officer Ramirez prior to deposition; deposition of Officer Ramirez and Rodney McBride - DGM	3.00 123.30/hr	369.90
Attend meeting of Board of Local Improvements at Public Works	1.00 123.30/hr	123.30
For professional services rendered	<hr/> 97.35	<hr/> \$9,734.09
Additional Charges :		
2/28/2014 Pacer charges for Joan Fiame bankruptcy		0.50
3/7/2014 Rosenthal bankruptcy: Filing fee for Adversary Complaint in Bankruptcy Court		293.00
3/10/2014 Sierra Morgan: Professional Investigation Services - service of deposition subpoenas on three witnesses (\$40.00 each)		120.00
3/11/2014 Dickerson: Deanna Levson, witness fee and mileage for deposition		42.53
Dickerson: Julius Hughes - witness fee and mileage for deposition		40.81
Dickerson: Rodney McBride - witness fee and mileage for deposition		45.00
Fiame bankruptcy: Clerk of the Court - copies of Judgment of Dissolution of Marriage and Separation Agreement		7.00
3/12/2014 Iowa-Illinois Reporting: Depositions of five witnesses regarding Morgan v. City		564.60
3/17/2014 Meridian Title: Limited Title Search regarding Southwest Library Branch & Fire Station		75.00
Casey Hunter: Pacer charge - recover documents		3.30
3/18/2014 Recorder of Deeds: re-record Warranty Deed, City to RIEC		42.50
3/19/2014 Dickerson: Professional Investigation Services - service of subpoenas on witnesses (3 @ \$40.00 each)		120.00
Total additional charges		<hr/> \$1,354.24
Total amount of this bill		<hr/> \$11,088.33
Previous balance		\$6,458.22
Accounts receivable transactions		
3/10/2014 Payment - thank you		(\$6,458.22)
3/19/2014 Credit for advanced expenses billed but never presented for honoring (City/DeSmet and City/Smith)		(\$32.71)
Total payments and adjustments		<hr/> (\$6,490.93)

	<u>Amount</u>
Balance due	<u>\$11,055.62</u>

FOR YOUR CONVENIENCE, WE ARE NOW ACCEPTING VISA, MASTERCARD, AMERICAN EXPRESS, AND DISCOVER CREDIT AND DEBIT CARDS.