



von Briesen & Roper, s.c. | Attorneys at Law

Kenosha County
c/o Jim Kupfer
19600 75th Street
Bristol, WI 53104

Invoice Date: October 14, 2021
Invoice Number: 370957
Attorney: Andrew T. Phillips
Tax ID: 39-1576289

*For Professional Services through **September 30, 2021***

Matter: Redistricting Litigation
Matter Number: 035167-00036

Total Fees	\$	5,900.00
Total Costs	\$	<u>41.10</u>
Total Due This Invoice	\$	5,941.10

Please contact Jodi Miller - jmiller@vonbriesen.com - (414) 287-1402
if you would like to receive your invoices by email or pay by credit card.
We accept Mastercard and VISA.

Time Detail

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
09/16/21	ATP	Telephone conference with Atty Cardamone regarding redistricting.	0.20	59.00
09/17/21	ATP	Analysis of materials and emails regarding lawsuit.	0.30	88.50
09/20/21	ATP	Telephone conference with Attys Caradmone and Kopp (.5); analysis of applicable precedent regarding redistricting considerations in light of equal protection requirements (2.4).	2.90	855.50
09/21/21	MJT	Call with client to discuss litigation; conduct initial research re: legal standards.	1.40	413.00
09/21/21	ATP	Conference call with County Executive and Corporation Counsel (.5); conference call with LIO, Corporation Counsel and Atty Thome (1.3); telephone conference with Atty Cardamone (.2); analysis of materials and maps (.4).	2.40	708.00
09/22/21	MJT	Confer with A. Phillips re: dispute and review caselaw relevant to issues.	0.50	147.50
09/22/21	ATP	Emails regarding status (.1); telephone conference with Atty Cardamone (.1).	0.20	59.00
09/23/21	ATP	Research and analysis of precedent regarding potential equal protection challenge (1.1); telephone conference with Atty Cardamone (.1).	1.20	354.00
09/24/21	MJT	Join call with client re: litigation.	0.30	88.50
09/24/21	ARM	Began researching Wisconsin law revolving around redistricting and considerations in cases of deviation from 10% rule.	2.40	708.00
09/24/21	ATP	Review materials (.1); conference call with Atty Cardamone and Atty Thome (.3).	0.40	118.00
09/27/21	ARM	Continued researching law revolving around redistricting.	2.30	678.50
09/28/21	ARM	Continued researching Wisconsin law on redistricting.	0.80	236.00
09/29/21	ARM	Continued researching for a case on redistricting and equal protection.	2.70	796.50
09/29/21	MJT	Review draft notice of appearance.	0.10	29.50
09/29/21	ATP	Telephone conference with Atty Nudo (.2); analysis of maps, statutes and information (.9).	1.10	324.50
09/30/21	MJT	Call with client and confer A. Phillips afterward.	0.30	88.50
09/30/21	ATP	Conference call with Attys Kopp and Thome (.3); emails regarding meeting (.2).	0.50	147.50
Total Fees			20.00	\$5,900.00

Kenosha County

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October 14, 2021
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Timekeeper Summary

<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Audrey R. Merkel	Associate	8.20	295.00	2,419.00
Andrew T. Phillips	Shareholder	9.20	295.00	2,714.00
Matthew J. Thome	Shareholder	2.60	295.00	767.00
	Total	20.00		\$5,900.00

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
09/29/21	Corporate Card - Kenosha County Clerk of Court re: filing fee	1.00	20.55
09/29/21	Corporate Card - Kenosha County Clerk of Court re: filing fee	1.00	20.55
	Total Costs		\$41.10
	Matter Total		\$5,941.10

VON Briesen

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Invoice Date: November 18, 2021
Invoice Number: 374766
Attorney: Andrew T. Phillips
Tax ID: 39-1576289

*For Professional Services through **October 31, 2021***

Matter: Redistricting Litigation
Matter Number: 035167-00036

Total Fees	\$	23,275.50
Total Costs	\$	<u>64.00</u>
Total Due This Invoice	\$	23,339.50
Previous Balance Due	\$	<u>5,941.10</u>
Amount Due	\$	<u>29,280.60</u>

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10/04/21	ARM	Continued researching case law on redistricting.	3.10	914.50
10/04/21	ATP	Telephone conference with Atty Cardamone.	0.10	29.50
10/04/21	MJT	Confirm service date of complaint; review other redistricting cases to identify cases with similar facts.	0.70	206.50
10/05/21	ARM	Continued researching law on redistricting.	1.00	295.00
10/05/21	ATP	Meeting regarding strategy for defense.	0.20	59.00
10/05/21	MJT	Determine proper response time to complaint.	0.20	59.00
10/06/21	MJT	Call with opposing counsel re: status; review documents; prepare for interview with S. Schutze.	0.90	265.50
10/06/21	ARM	Continued researching law relating to redistricting.	1.60	472.00
10/06/21	ATP	Telephone conference with Atty Cardamone.	0.20	59.00
10/07/21	ATP	Analysis of notes from meeting and consider strategy.	0.20	59.00
10/07/21	ARM	Went through notes from meeting with Scott Schutze; emailed typed notes to Matt Thome and Andy Phillips.	1.40	413.00
10/07/21	MJT	Meet with S. Schutze to discuss case.	3.30	973.50
10/08/21	MJT	Coordinate filing of stipulation of time to answer complaint.	0.20	59.00
10/11/21	MJT	Analyze legal issues presented by plaintiffs' claims; email correspondence with client re: additional maps prepared by plaintiffs and requests for information.	1.80	531.00
10/11/21	ATP	Analysis of Notice of Hearing and telephone conference with Atty Thome.	0.10	29.50
10/12/21	MJT	Review case materials and beginning analyzing legal issues; correspondence with client re: same.	2.00	590.00
10/12/21	ARM	Watched the video of Kenosha County's board meeting on September 15; began watching the Redistricting Public Hearing on September 15.	2.60	767.00
10/13/21	MJT	Analyze issues re: constitutional claim filed against County; call with client re: case; work on partial motion to dismiss.	5.00	1,475.00
10/13/21	ATP	Telephone conference with Atty Nudo (.1); analysis of materials and pleadings (.7); conference call with Corporation Counsel's office regarding strategy (.6); meeting with Atty Thome regarding strategy (.2).	1.60	472.00
10/13/21	ARM	Reviewed redistricting county meetings.	4.00	1,180.00
10/15/21	MJT	Prepare for and attend status hearing; e-mail correspondence with S. Schutze.	1.90	560.50
10/15/21	ATP	Telephone conferences with Atty Thome	0.80	236.00

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
		throughout day regarding strategy on imminent motion for injunctive relief (.4); zoom hearing with Court (.4).		
10/18/21	MJT	Call with client re: status of case; e-mail S. Schutze re: schedule; analyze issues relevant to Plaintiffs' claims.	1.60	472.00
10/18/21	ATP	Telephone conference with Corporation Counsel and Atty Thome.	0.40	118.00
10/19/21	ATP	Emails regarding prior litigation with City (.1); emails with Atty Cardamone (.2).	0.30	88.50
10/19/21	MJT	Address issues re: preparation of motion to dismiss and answer; e-mail questions to S. Schutze.	4.60	1,357.00
10/20/21	MJT	Prepare draft answer to complaint; review injunction paperwork filed by Plaintiffs.	3.40	1,003.00
10/20/21	ATP	Telephone conference with Atty Cardamone (.2); review materials filed in support of motion for temporary injunction (.5).	0.70	206.50
10/21/21	MJT	Travel to and from Kenosha for meeting with S. Schutze; meet with S. Schutze to prepare draft affidavit and to prepare for testimony.	7.50	2,212.50
10/21/21	ATP	Telephone conference with Atty Thome regarding strategy (.2); telephone conference and emails with reporter (.2).	0.40	118.00
10/22/21	MJT	Finalize affidavit of Scott Schutze; finalize and coordinate filing of partial motion to dismiss and answer to complaint.	6.40	1,888.00
10/22/21	ATP	Analysis of draft Schutze Affidavit and emails with Atty Thome (.3); revisions to Answer and emails with Atty Thome (.4).	0.70	206.50
10/22/21	ARM	Begin drafting the response to the motion for temporary injunction.	2.60	767.00
10/25/21	MJT	Work on opposition to motion for temporary injunction.	4.10	1,209.50
10/25/21	ATP	Telephone conference with Atty Cardamone.	0.20	59.00
10/26/21	MJT	Revise draft of opposition to motion for temporary injunction.	5.70	1,681.50
10/26/21	ATP	Analysis of statutes and emails regarding notice deadlines for Spring election.	0.30	88.50
10/27/21	MJT	Finalize response to motion for preliminary injunction.	3.60	1,062.00
10/27/21	ATP	Review and revise Brief in Opposition to Injunction (.8); series of telephone conferences with Atty Thome (.3); emails regarding briefing and status (.2).	1.30	383.50
10/28/21	ATP	Telephone conference with Atty Cardamone.	0.30	88.50
10/29/21	MJT	Email correspondence to client and opposing	1.60	472.00

Kenosha County

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/29/21	ATP	counsel re: case; prepare for injunction hearing. Telephone conference with Atty Cardamone regarding schedule (.2); telephone conference with Atty Thome (.1).	0.30	88.50
Total Fees			78.90	\$23,275.50

Timekeeper Summary

<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Audrey R. Merkel	Associate	16.30	295.00	4,808.50
Andrew T. Phillips	Shareholder	8.10	295.00	2,389.50
Matthew J. Thome	Shareholder	54.50	295.00	16,077.50
Total		78.90		\$23,275.50

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Amount</u>
10/28/21	General Delivery Charges	1.00	64.00
Total Costs			\$64.00
Previous Balance Due			\$5,941.10
Matter Total			\$29,280.60

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Invoice Date: December 15, 2021
Invoice Number: 377375
Attorney: Andrew T. Phillips
Tax ID: 39-1576289

*For Professional Services through **November 30, 2021***

Matter: Redistricting Litigation
Matter Number: 035167-00036

Total Fees	\$	<u>3,127.00</u>
Total Due This Invoice	\$	3,127.00
Previous Balance Due	\$	<u>23,339.50</u>
Amount Due	\$	<u>26,466.50</u>

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/01/21	MJT	E-mail correspondence with client re: preparation for temporary injunction hearing; e-mail correspondence with opposing counsel and court re: deadline for noticing hearing for motion to dismiss; prepare for upcoming hearing on temporary injunction.	1.60	472.00
11/01/21	ATP	Telephone conferences with Atty Thome and Atty Cardamone.	0.30	88.50
11/02/21	MJT	Prepare for temporary injunction hearing; attend temporary injunction hearing.	5.00	1,475.00
11/02/21	ATP	Prepare for and represent County in injunction hearing; follow-up calls regarding decision.	2.20	649.00
11/03/21	MJT	Prepare proposed order denying temporary injunction and correspondence and coordination of filing re: same.	0.40	118.00
11/03/21	ATP	Telephone conference with Atty Cardamone regarding status and procedure for finalizing plan.	0.20	59.00
11/09/21	MJT	Correspondence with opposing counsel re: scheduling.	0.20	59.00
11/15/21	MJT	Analyze common discovery issues in redistricting litigation.	0.40	118.00
11/16/21	MJT	Email to client re: document preservation.	0.10	29.50
11/18/21	ATP	Telephone conference with Atty Cardamone.	0.20	59.00
Total Fees			10.60	\$3,127.00

Timekeeper Summary

<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Andrew T. Phillips	Shareholder	2.90	295.00	855.50
Matthew J. Thome	Shareholder	7.70	295.00	2,271.50
Total		10.60		\$3,127.00
Previous Balance Due				\$23,339.50
Matter Total				\$26,466.50

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Invoice Date: January 16, 2022
Invoice Number: 380019
Attorney: Andrew T. Phillips
Tax ID: 39-1576289

*For Professional Services through **December 31, 2021***

Matter: Redistricting Litigation
Matter Number: 035167-00036

Total Fees	\$	<u>236.00</u>
Total Due This Invoice	\$	236.00

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Kenosha County

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January 16, 2022
380019
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Time Detail

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/01/21	MJT	Communicate with opposing counsel and client re: voluntary dismissal of case.	0.30	88.50
12/02/21	MJT	Revise draft stipulation of dismissal; email correspondence with opposing counsel and client re: same.	0.40	118.00
12/07/21	MJT	Email correspondence to client re: dismissal of case.	0.10	29.50
Total Fees			0.80	\$236.00

Timekeeper Summary

<u>Name</u>	<u>Timekeeper Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Matthew J. Thome	Shareholder	0.80	295.00	236.00
Total		0.80		\$236.00
Matter Total				\$236.00

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Total Fees	\$	<u>236.00</u>
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