

Municipal LAW

& LITIGATION GROUP

Municipal Law & Litigation Group, S.C.

730 N. Grand Avenue
Waukesha, WI 53186
Phone: (262) 548-1340
www.municipallawsc.com

INTERIM INVOICE

Invoice # 9704
Date: 04/24/2023
Due On: 05/24/2023

Kenosha County
Ms. Jennifer Kopp - via email
Jennifer.Kopp@kenoshacounty.org
Kenosha County Corporation Counsel
912 56th St, Lower Level 13
Kenosha, WI 53140-3736

Mathewson, Kevin v. Kenosha County - Public Records Matter - Kmiec Body Cam Videos

CONFIDENTIAL

THIS DOCUMENT IS ATTORNEY-CLIENT PRIVILEGED AND ATTORNEY WORK PRODUCT

IT IS NOT SUBJECT TO DISCLOSURE UNDER THE PUBLIC RECORDS LAW WITHOUT APPROVAL BY THE
CLIENT AND ATTORNEY

Services

Attorney	Date	Description	Quantity	Rate	Total
PA	03/16/2023	Initial Analysis of Pleadings and Paper Concerning Petition for Writ; Analysis of Correspondence Concerning Release of Records.	1.30	\$210.00	\$273.00
KW	03/17/2023	Draft Notice of Appearance for Attorney Remzy Bitar and Attorney Paul Alexy, Acceptance of Service and Certificate of Service	0.30	\$0.00	\$0.00
PA	03/17/2023	Research of Wisconsin Law for Preparation of Proposed Records Response Letter.	0.50	\$210.00	\$105.00

PA	03/17/2023	Preparation of Revisions to Proposed Records Response Letter.	0.80	\$210.00	\$168.00
PA	03/19/2023	Analysis of Petitioner's Request for Third-Party Subpoena	0.10	\$210.00	\$21.00
PA	03/20/2023	Initial Preparation of Notice of Motion and Motion to Dismiss Petition for Writ of Certiorari.	0.50	\$210.00	\$105.00
PA	03/20/2023	Review Notice of Hearing from Circuit Court; Correspondence from Petitioner Concerning Electronic Filing Status.	0.20	\$210.00	\$42.00
PA	03/20/2023	Analysis of Wisconsin Law Concerning Standard of Review for Petition for Writ of Certiorari.	0.60	\$210.00	\$126.00
PA	03/21/2023	Telephone Conference with Counsel for Record Subject Concerning Record Subject's Receipt of Notice of Deposition, Potential Appearance in Support of Named Defendants.	0.50	\$210.00	\$105.00
RDB	03/21/2023	Correspondence with Kopp Regarding Third Party Subpoena and Current Strategy	0.20	\$210.00	\$42.00
PA	03/21/2023	Correspondence with Counsel for Record Subject Concerning Availability of Video(s) Released to Petitioner.	0.20	\$210.00	\$42.00
RDB	03/22/2023	Draft Correspondence to Court Regarding Staying Action until Motion to Dismiss Filed	0.30	\$210.00	\$63.00
RDB	03/22/2023	Review Correspondence from Clients and Other Developments as to Discovery	0.20	\$210.00	\$42.00
PA	03/22/2023	Analysis of Correspondence Concerning Additional Records Requests' Correspondence from Counsel for Record Subject Concerning Obtaining Redacted Body Camera Footage; Preparation of Correspondence to Court Concerning Impending Motion to Dismiss.	0.90	\$210.00	\$189.00
PA	03/23/2023	Correspondence with Petitioner Concerning Courtesy Copy (N/C) Analysis of Correspondence from Petitioner Concerning Filing of Motion to Dismiss.	0.20	\$210.00	\$42.00
PA	03/23/2023	Research: Analysis of Wisconsin Law Concerning Issuance of Writ of Mandamus .	2.30	\$210.00	\$483.00
PA	03/23/2023	Draft Documents: Initial Preparation of Brief in Opposition to Petition for Mandamus.	1.80	\$210.00	\$378.00
PA	03/24/2023	Review Document: Analysis of Amended Petition and Petitioner's Correspondence to Court.	0.60	\$210.00	\$126.00
PA	03/24/2023	Review Document: Preparation of Argument Concerning Petitioner's Failure to Establish Clear Right/ Duty for Inclusion in Brief in Opposition to Petition for Writ.	2.40	\$210.00	\$504.00

PA	03/24/2023	Review Document: Preparation of Argument Concerning Petitioner's Failure to Establish Substantial Damages for Inclusion in Brief in Opposition to Petition for Writ.	1.90	\$210.00	\$399.00
PA	03/24/2023	Research of Wisconsin Law Concerning Requirements for Substantial Damages for Writ of Mandamus.	0.90	\$210.00	\$189.00
PA	03/25/2023	Research of Wisconsin Law Concerning Requirements for Alternative Remedies for Writ of Mandamus.	1.30	\$210.00	\$273.00
PA	03/26/2023	Review Document: Preparation of Argument Concerning Petitioner's Failure to Establish a Lack of an Alternative at Law for Inclusion in Brief in Opposition to Petition for Writ.	1.70	\$210.00	\$357.00
RDB	03/27/2023	Continue Drafting Brief in Support of Motion to Dismiss	1.00	\$210.00	\$210.00
PA	03/27/2023	Correspondence: Correspondence with Corporation Counsel Concerning Amended Petition.	0.30	\$210.00	\$63.00
PA	03/27/2023	Draft Documents: Preparation of Revisions to Draft Memorandum in Support of Motion to Dismiss,	0.40	\$210.00	\$84.00
PA	03/27/2023	Correspondence: Correspondence from Petitioner Concerning Amended Petition.	0.10	\$210.00	\$21.00
PA	03/27/2023	Analysis of Correspondence From Corporation Counsel and Sheriff's Office Concerning Submitted Records Response Letters.	0.40	\$210.00	\$84.00
PA	03/27/2023	Analysis of Court Filings Concerning Judicial Assignment.	0.10	\$210.00	\$21.00
PA	03/28/2023	Analysis of Correspondence (x2) from Cooperation Counsel Concerning Dispatch Audio Redactions.	0.20	\$210.00	\$42.00
RDB	03/31/2023	Correspondence with Clients - Judicial Substitution	0.10	\$210.00	\$21.00
PA	03/31/2023	Analysis of Correspondence from Client Concerning Draft; Correspondence with Client Concerning Response Letter to Petitioner Concerning Audio File Requests.	0.50	\$210.00	\$105.00
RDB	04/03/2023	Review Correspondence from Kopp Regarding Original and Redacted Audio	0.10	\$210.00	\$21.00
PA	04/03/2023	Analysis of File Materials and Preparation of Proposed Response Letter to Petitioner Concerning Audio File Requests.	1.80	\$210.00	\$378.00
PA	04/03/2023	Analysis of Correspondence from Client Concerning Draft Brief, Related Filings.	0.20	\$210.00	\$42.00
RDB	04/03/2023	Provide Additional Authority and Argument for Brief in Support of Motion to Dismiss Regarding Fourth Amendment, Add Introduction and Other Revisions	0.90	\$210.00	\$189.00

RDB	04/04/2023	Draft Affidavit and Prepare Exhibits for Motion to Dismiss	0.50	\$210.00	\$105.00
RDB	04/04/2023	Finalize Brief in Support of Motion to Dismiss	0.50	\$210.00	\$105.00
PA	04/04/2023	Draft Revisions to Brief in Support of Motion to Dismiss Pending Petition. Correspondence with Client Concerning Proposed Reply Letter to 911 Audio File Request.	0.80	\$210.00	\$168.00
RDB	04/05/2023	Review Correspondence from Mathewson Regarding Refiling Suit and OLR Complaint	0.10	\$210.00	\$21.00
RDB	04/05/2023	Draft Objections and Responses to Plaintiff's Discovery	0.90	\$210.00	\$189.00
PA	04/05/2023	Review Correspondence from Petitioner Concerning Pending Litigation; Correspondence with Client Concerning Proposed 911 Records Response Letter and Review of Proposed Revisions to Same. Review correspondence Concerning 911 Response Letter and Petitioner Discovery Request.	1.00	\$210.00	\$210.00
RDB	04/05/2023	Review Correspondence from Kopp Regarding Mathewson Communication with Sheriff on Requests for Admission	0.10	\$210.00	\$21.00
				Quantity Subtotal	29.7
				Services Subtotal	\$6,174.00

Expenses

Attorney	Date	Description	Quantity	Rate	Total
KW	03/17/2023	Kenosha County Circuit Court eFiling Fee	1.00	\$20.55	\$20.55
				Expenses Subtotal	\$20.55

Time Keeper	Quantity	Rate	Total
Paul Alexy	24.5	\$210.00	\$5,145.00
Remzy D. Bitar	4.9	\$210.00	\$1,029.00
Kimm Whitaker	0.3	\$0.00	\$0.00
		Quantity Total	29.7
		Subtotal	\$6,194.55
		Total	\$6,194.55

Please make all amounts payable to: Municipal Law & Litigation Group, S.C. 730 N. Grand Avenue, Waukesha, WI

53186 Tax ID No: 391510894

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INTERIM INVOICE

Invoice # 9964
Date: 05/25/2023
Due On: 06/24/2023

Kenosha County
Ms. Jennifer Kopp - via email
Jennifer.Kopp@kenoshacounty.org
Kenosha County Corporation Counsel
912 56th St, Lower Level 13
Kenosha, WI 53140-3736

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Attorney	Date	Description	Quantity	Rate	Total
RDB	04/06/2023	Correspondence with Clients Regarding Settlement Offer from Mathewson, Response Brief, Attention to Hearing Date and Review of Discovery	0.40	\$210.00	\$84.00
RDB	04/06/2023	Review Notice of Assignment, Telephone Conference with Corporation Counsel and Prepare Judicial Substitution	0.40	\$210.00	\$84.00
RDB	04/06/2023	Review Subpoena Signed by Judge and Requested by Mathewson	0.10	\$210.00	\$21.00
PA	04/06/2023	Initial Analysis of Petitioner's Brief in Opposition to Motion to Dismiss. Review of Notice of Judicial Assignment.	0.40	\$210.00	\$84.00

RDB	04/10/2023	Correspondence with Kopp Regarding Judicial Substitution Status	0.10	\$210.00	\$21.00
PA	04/10/2023	Review Correspondence from Petitioner Concerning Request for Judicial Assignment, Offer of Settlement. Review Correspondence from Client Concerning Potential Transfer to Racine.	0.30	\$210.00	\$63.00
PA	04/10/2023	Analysis of Petitioner's Offer of Settlement (Amended) and Correspondence from Client Regarding Same.	0.20	\$210.00	\$42.00
RDB	04/10/2023	Review Correspondence from Mathewson Regarding Substitution of Judge	0.10	\$210.00	\$21.00
PA	04/12/2023	Analysis of Petitioner's Response Memorandum to Motion to Dismiss; Analysis of Case Cited..	0.80	\$210.00	\$168.00
PA	04/12/2023	Preparation of Reply Memorandum to Petitioner's Response Brief.	3.30	\$210.00	\$693.00
RDB	04/13/2023	Review Correspondence from Gagliardi Regarding Intervention and Motion to Quash	0.10	\$210.00	\$21.00
RDB	04/13/2023	Complete Reply Brief in Support of Motion to Dismiss	0.80	\$210.00	\$168.00
RDB	04/13/2023	Complete Objection and Responses to Admissions	0.80	\$210.00	\$168.00
RDB	04/13/2023	Draft Letter Resonse to Mathewson on Offer of Judgment, Motion to Dismiss and Offering to Waive Costs	0.30	\$210.00	\$63.00
RDB	04/13/2023	Complete Responses to Requests for Admissions	0.30	\$210.00	\$63.00
PA	04/13/2023	Preparation of Revisions to Draft Reply Brief;	1.30	\$210.00	\$273.00
PA	04/13/2023	Participation in Scheduled Teleconference with Corporation Counsel's Office Concerning Reply Brief, Settlement Proposal, Discovery Issues.	1.00	\$210.00	\$210.00
PA	04/13/2023	Correspondence with Corporation Counsel's Office Concerning Draft Reply Brief.	0.40	\$210.00	\$84.00
PA	04/14/2023	Review Correspondence from Petitioner Concerning Settlement Offer Response, Reply Brief.	0.10	\$210.00	\$21.00
RDB	04/16/2023	Review Correspondence from Mathewson Regarding Rejection of Settlement Offer	0.10	\$210.00	\$21.00
PA	04/17/2023	Analysis of Circuit Court Application for Judicial Assignment.	0.10	\$210.00	\$21.00
RDB	04/18/2023	Review New Judicial Assignment, Intervention Papers and Correspondence Regarding Updates on Case	0.50	\$210.00	\$105.00
PA	04/18/2023	Review Notification from Circuit Court Concerning Judicial Assignment; Correspondence from First Ass't Corporation Counsel Concerning Transfer to Walworth County.	0.20	\$210.00	\$42.00

RDB	04/19/2023	Review Correspondence from Gagliardi Regarding Intervention and Settlement Proposal from Mathewson	0.20	\$210.00	\$42.00
RDB	04/19/2023	Review New Settlement Proposal from Mathewson and Correspondence with Clients	0.10	\$210.00	\$21.00
PA	04/19/2023	Review Document: Notice from Court Concerning Application for Specific Judicial Assignment.	0.10	\$210.00	\$21.00
PA	04/20/2023	Analysis of Wisconsin Law Concerning Petitioner's Settlement Proposal.	0.30	\$210.00	\$63.00
RDB	04/21/2023	Correspondence with Clients Regarding Mathewson Settlement Proposal	0.10	\$210.00	\$21.00
PA	04/21/2023	Participation in Teleconference with Corporation Counsel's Office Concerning Settlement Proposal; Impending Transfer of Case.	0.80	\$210.00	\$168.00
PA	04/21/2023	Correspondence with Records Requestor Concerning Settlement Proposal, Alternative Proposals.	0.20	\$210.00	\$42.00
RDB	04/26/2023	Correspondence with Mathewson - Settlement Response	0.20	\$210.00	\$42.00
RDB	04/26/2023	Correspondence with Gagliardi - Status on Hearing for Motion to Dismiss	0.10	\$210.00	\$21.00
PA	04/26/2023	Analysis of Correspondence from Petitioner Concerning Settlement Response. Analysis of Wisconsin Law Concerning Alternative Transcript.	0.50	\$210.00	\$105.00

Non-billable entries

RDB	04/13/2023	Telephone Conference with Corporation Counsel's Office Regarding Status, Judicial Substitution, Offer of Judgment and Other Litigation Issues	1.00	\$210.00	\$210.00
RDB	04/21/2023	Participation in Teleconference with Corporation Counsel's Office Concerning Settlement Proposal; Impending Transfer of Case.	0.80	\$210.00	\$168.00

Quantity Subtotal 16.5

Time Keeper	Quantity	Rate	Total
Paul Alexy	10.0	\$210.00	\$2,100.00
Remzy D. Bitar	4.7	\$210.00	\$987.00
Quantity Total			16.5
Subtotal			\$3,087.00
Total			\$3,087.00

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INTERIM INVOICE

Invoice # 10274
Date: 07/28/2023
Due On: 08/27/2023

Kenosha County
Ms. Jennifer Kopp - via email
Jennifer.Kopp@kenoshacounty.org
Kenosha County Corporation Counsel
912 56th St, Lower Level 13
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Attorney	Date	Description	Quantity	Rate	Total
RDB	05/12/2023	Review New Judicial Assignment	0.10	\$210.00	\$21.00
RDB	05/12/2023	Correspondence with Clients Regarding Status	0.10	\$210.00	\$21.00
RDB	05/15/2023	Telephone Conference with Clients Regarding Status	0.10	\$210.00	\$21.00
RDB	05/31/2023	Review for Status on Court Docket	0.10	\$210.00	\$21.00
RDB	06/05/2023	Review Regarding Roberts Request for Video and Response Thereto	0.10	\$210.00	\$21.00
Quantity Subtotal					0.5

Time Keeper	Quantity	Rate	Total
Remzy D. Bitar	0.5	\$210.00	\$105.00
		Quantity Total	0.5
		Subtotal	\$105.00
		Total	\$105.00

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INTERIM INVOICE

Invoice # 10505
Date: 08/29/2023
Due On: 09/28/2023

Kenosha County
Ms. Jennifer Kopp - via email
Jennifer.Kopp@kenoshacounty.org
Kenosha County Corporation Counsel
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Attorney	Date	Description	Quantity	Rate	Total
RDB	07/27/2023	Review Notice of Hearing	0.10	\$210.00	\$21.00
RDB	07/30/2023	Correspondence from Mathewson Seeking Adjournment Due to Medical Issue	0.10	\$210.00	\$21.00
RDB	07/30/2023	Review Plaintiff Proposed Motion for Adjournment	0.10	\$210.00	\$21.00
Quantity Subtotal					0.3

Time Keeper	Quantity	Rate	Total
Remzy D. Bitar	0.3	\$210.00	\$63.00

Quantity Total	0.3
Subtotal	\$63.00
Total	\$63.00

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INTERIM INVOICE

Invoice # 10658
Date: 09/26/2023
Due On: 10/26/2023

Kenosha County
Ms. Jennifer Kopp - via email
Jennifer.Kopp@kenoshacounty.org
Kenosha County Corporation Counsel
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RDB	08/04/2023	Begin Reviewing File Materials in Preparation for Hearing	0.30	\$210.00	\$63.00
RDB	08/07/2023	Review Correspondence from Corporation Counsel Regarding Transcription of Video	0.10	\$210.00	\$21.00
RDB	08/07/2023	Telephone Conference with Kopp Regarding Status	0.20	\$210.00	\$42.00
RDB	08/07/2023	Correspondence with Corporation Counsel Regarding Transcription of Videos and Review File Materials for Preparation to Court Reporter	0.40	\$210.00	\$84.00
RDB	08/07/2023	Correspondence with Cardamone Regarding Status of Hearing	0.10	\$210.00	\$21.00

RDB	08/07/2023	Correspondence with Clients Regarding Status of Hearing	0.10	\$210.00	\$21.00
RDB	08/07/2023	Call with Clerk of Court Regarding Status of Hearing	0.10	\$210.00	\$21.00
RDB	08/07/2023	Correspondence with Kopp Potential Hearing Tomorrow	0.10	\$210.00	\$21.00
RDB	08/07/2023	Correspondence with Mathewson and Court Clerk Regarding Adjournment	0.10	\$210.00	\$21.00
RDB	08/07/2023	Review Notice of Hearing for Adjourned Hearing	0.10	\$210.00	\$21.00
RDB	08/07/2023	Telephone Conference with Kopp and Cardamone Regarding Status	0.10	\$210.00	\$21.00
RDB	08/07/2023	Correspondence with Attorney Gagliardi Regarding Status	0.10	\$210.00	\$21.00
RDB	08/09/2023	Attention to Transcript Order for Body Cam Videos	0.10	\$210.00	\$21.00
TS	08/09/2023	Communications with Veritext relative to transcription services for 4 Body Camera Officer Videos. (TLG)	0.10	\$95.00	\$9.50
TS	08/10/2023	Further communications with Veritext relative to transcription services for 4 Body Camera Officer Videos, including completion of Audio Transcription Form requesting same. (TLG)	0.10	\$95.00	\$9.50
RDB	08/11/2023	Correspondence with Judge's Clerk Regarding Motion Hearing on Intervention by Kmiec	0.10	\$210.00	\$21.00
RDB	08/11/2023	Review Correspondence from Gagliardi to Court Seeking intervention in Case	0.10	\$210.00	\$21.00
RDB	08/25/2023	Review Transcripts Returned from Court Reporter and Correspondence with Clients Regarding Same	0.20	\$210.00	\$42.00
TS	08/25/2023	Follow-up communication with Veritext relative to transcription services for 4 Body Camera Officer Videos. (TLG)	0.10	\$95.00	\$9.50
RDB	08/31/2023	Correspondence with Gott Regarding Transcriptions	0.10	\$210.00	\$21.00
TS	09/05/2023	Follow-up communication with Peggy Nelson at Veritext relative to revisions to transcription services for 4 Body Camera Officer Videos. (TLG)	0.10	\$95.00	\$9.50

Quantity Subtotal 2.8

Time Keeper	Quantity	Rate	Total
Remzy D. Bitar	2.4	\$210.00	\$504.00
Tari Schulte	0.4	\$95.00	\$38.00

Quantity Total 2.8

Subtotal	\$542.00
Total	\$542.00

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