

Morrison, Marquis, Campbell, Lareau & Weng

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

INVOICE

Invoice # 290
Date: 03/31/2021
Due On: 04/12/2021

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	03/15/2021	Receive and review redacted reports in response to PAC counsel direction; follow-up exchanges with client representative regarding same; receive and review bar fight reports and related subpoena; communications with client representatives and DGM regarding same.	1.40	\$140.78	\$197.09
Service	03/17/2021	Telephone conference with client representative regarding request relating to occurrence that did not result in investigation; receive and review related report.	0.50	\$140.78	\$70.39
Service	03/18/2021	Legal research regarding invasion of privacy exemption and application; communications with client representative regarding same.	1.20	\$140.78	\$168.94
			Quantity Subtotal		3.1
				Subtotal	\$436.42

00002-City of Rock Island

Chavez wrongful death

Type	Date	Notes	Quantity	Rate	Total
Service	03/15/2021	Review resistance to third-party's motion to dismiss; communications with counsel regarding same; receive and review file-stamped copy of same.	0.70	\$140.78	\$98.55

Service	03/18/2021	Receive and review reply regarding motion to dismiss.	0.50	\$140.78	\$70.39
Service	03/24/2021	Review status of motion to dismiss affirmative defense; draft resistance to same.	0.80	\$140.78	\$112.62
			Quantity Subtotal		2.0
			Subtotal		\$281.56

00005-City of Rock Island

CED matters

Type	Date	Notes	Quantity	Rate	Total
Service	03/04/2021	Received and review Bankruptcy Statement of Intentions. Emails to Caitlin, Jen, Christine and Nichole. Telephone conference with Nichole and Preparation of Reaffirmation Agreement. Had Dave look over document. Meeting with City Manager to have signed. Letter to Debtors Attorney with Reaffirmation agreement for signature.	1.45	\$71.44	\$103.59
Service	03/22/2021	draft proposed indemnity language and research files for examples of worker safety plans for construction and environmental workers at site	0.80	\$140.78	\$112.62
			Quantity Subtotal		2.25
			Subtotal		\$216.21

00007-City of Rock Island

Steel Dam lease

Type	Date	Notes	Quantity	Rate	Total
Service	03/16/2021	received and review letter from Illinois DNR with attachments and forwarded to public works, city manager, Lisa Perry and Hector L.	0.50	\$140.78	\$70.39
Service	03/17/2021	meeting to discuss lease cancellation letter from IDNR	1.00	\$140.78	\$140.78
Service	03/31/2021	telephone conference with IDNSR rep and follow up emails	0.30	\$140.78	\$42.23
			Quantity Subtotal		1.8
			Subtotal		\$253.40

00011-City of Rock Island

MUNICES

Type	Date	Notes	Quantity	Rate	Total
Service	03/12/2021	Prepare and file Notice of Registration of Administrative Judgment 1515 11th Street.	0.30	\$71.44	\$21.43
Service	03/12/2021	Prepare and file Notice of Registration of Administrative Judgment 1315 6th Avenue	0.30	\$71.44	\$21.43
Service	03/12/2021	Received filed stamped Notice of Registration of Administrative Judgment. Prepared Certificate of Judgment and file the same with Court. 1515 11th Street	0.20	\$71.44	\$14.29
Service	03/12/2021	Received file stamped copy of Notice of Administrative Judgment. prepared Certificate of Service filed with Court. 1315 6th Avenue	0.20	\$71.44	\$14.29
Expense	03/17/2021	Filing Fee Recorder of Deeds. File Certificate of Judgment. Property address 1515 11th Street, Rock Island.	1.00	\$55.00	\$55.00
Expense	03/17/2021	Filing Fee Recorder of Deeds. File Certificate of Judgment. Property address 1315 6th Avenue, Rock Island.	1.00	\$55.00	\$55.00
Service	03/17/2021	Prepare Certificate of Judgment 1515 11th Street	0.20	\$71.44	\$14.29
Service	03/17/2021	Prepare and File Certificate of Judgment 1315 6th Avenue	0.20	\$71.44	\$14.29
Service	03/22/2021	review letter from Human Rights Commission notice of perfection of claim by Holden regarding MUNICES judgments and emails to city staff members in inspections seeking assistance in collecting materials	0.30	\$140.78	\$42.23
Service	03/25/2021	Review two municies files and prepare for Certified Mail.	0.30	\$71.44	\$21.43
Expense	03/25/2021	Certified Mail \$824-25th Street and 605-41st Street. Municies Judgments	2.00	\$6.96	\$13.92
			Quantity Subtotal		2.0
				Subtotal	\$287.60

00015-City of Rock Island**Forrest Robb pothole**

Type	Date	Notes	Quantity	Rate	Total
Service	03/04/2021	Communications with plaintiff's counsel regarding summary judgment motion and briefing schedule for same; conference call with counsel and court administration to schedule same; prepare order for approval and transmit to counsel; prepare and file notice of hearing.	1.40	\$140.78	\$197.09
Service	03/05/2021	Communications from plaintiff's counsel approving scheduling order; submit same to court for execution; forward information regarding same to plaintiff's counsel.	0.60	\$140.78	\$84.47
Service	03/15/2021	Communications with court reporter regarding plaintiff's order of transcript; order, receive, and review copy of same.	0.50	\$140.78	\$70.39
Service	03/16/2021	Telephone conferences with plaintiff's counsel regarding upcoming case management conference.	0.40	\$140.78	\$56.31
			Quantity Subtotal		2.9
			Subtotal		\$408.26

00018-City of Rock Island**Rock Island Realty**

Type	Date	Notes	Quantity	Rate	Total
Service	03/01/2021	Conference call with parties and counsel regarding possible settlement; follow-up call with DGM and client representatives.	1.00	\$140.78	\$140.78
Service	03/02/2021	zoom conference with attorney Doak and Richard Getty	0.70	\$140.78	\$98.55
Service	03/04/2021	Receive and review correspondence from opposing counsel regarding scope of work; conference with DGM regarding framing response to forthcoming proposal.	0.50	\$140.78	\$70.39
Service	03/18/2021	telephone conference with Judge Hawley regarding status of case	0.30	\$140.78	\$42.23
Service	03/18/2021	Receive and review order from federal court regarding procedures going forward; conference with DGM regarding same.	0.80	\$140.78	\$112.62

Service	03/31/2021	correspondence with Defendant's counsel regarding possible settlement	0.20	\$140.78	\$28.16
			Quantity Subtotal		3.5
			Subtotal		\$492.73

00025-City of Rock Island

Estrada & Joy

Type	Date	Notes	Quantity	Rate	Total
Service	03/25/2021	Communications with client representative regarding initiation of law suit; select appropriate pleading and forward.	0.50	\$140.78	\$70.39
			Quantity Subtotal		0.5
			Subtotal		\$70.39

00021-City of Rock Island

Danielle Herber slip and fall on ped mall

Type	Date	Notes	Quantity	Rate	Total
Service	03/02/2021	Receive and review amended complaint.	0.50	\$140.78	\$70.39
Service	03/03/2021	Draft answer and affirmative defenses to plaintiff's first amended complaint.	1.00	\$140.78	\$140.78
Service	03/04/2021	Execute affidavit regarding answer to first amended complaint; file and serve same.	0.40	\$140.78	\$56.31
Service	03/15/2021	Receive and review summonses for five additional new defendants.	0.70	\$140.78	\$98.55
Service	03/16/2021	Telephone conference with plaintiff's counsel regarding upcoming case management conference and revised case management order; circulate proposed agreed order; several telephone conferences with plaintiff's counsel regarding misnomer of new defendant and procedural gambits for curing same.	0.80	\$140.78	\$112.62
Service	03/25/2021	Receive and review co-defendant Smoking Dog's answer to first amended complaint; separately filed affirmative defenses; and counter complaints for contribution against the five lately added defendants.	0.60	\$140.78	\$84.47

Service	03/29/2021	Receive and review voluminous supplemental discovery responses from plaintiff's counsel.	0.80	\$140.78	\$112.62
			Quantity Subtotal		4.8
			Subtotal		\$675.74

00019-City of Rock Island

Beverly McAninch police chase

Type	Date	Notes	Quantity	Rate	Total
Service	03/15/2021	Inquiries regarding surveillance services and rates.	0.60	\$140.78	\$84.47
Service	03/16/2021	Work on identifying needed discovery documents; communications with client representative regarding same; conference call with excess carrier counsel and DGM regarding exposure.	2.20	\$140.78	\$309.72
Service	03/17/2021	Telephone conference with client representative regarding documents to be produced; detailed review of same.	0.80	\$140.78	\$112.62
Service	03/23/2021	Conference with DGM regarding requests from excess carrier; conference call with DGM and client representative regarding same.	0.40	\$140.78	\$56.31
Service	03/25/2021	Communications with client representative regarding discussing reserves with excess carrier and regarding surveillance of plaintiff.	0.50	\$140.78	\$70.39
Service	03/26/2021	Work on assembling documents for production; communications with plaintiff's counsel regarding ways to ease process of production.	2.20	\$140.78	\$309.72
Service	03/30/2021	Work on assembling production request responses in digital format to transfer.	1.00	\$140.78	\$140.78
			Quantity Subtotal		7.7
			Subtotal		\$1,084.01

00700-City of Rock Island

Traffic discovery

Type	Date	Notes	Quantity	Rate	Total
Service	03/04/2021	Review and downloaded Discovery Files.	1.75	\$71.44	\$125.02

Service	03/10/2021	Review and worked on Traffic Discovery Files.	1.00	\$71.44	\$71.44
Service	03/12/2021	Prepared hard copies of discovery and download discovery regarding four filed. Prepared letters to attorney's and mailed out.	2.30	\$71.44	\$164.31
			Quantity Subtotal		5.05
			Subtotal		\$360.77

00028-City of Rock Island

Sherry Brown v. City

Type	Date	Notes	Quantity	Rate	Total
Service	03/16/2021	Telephone conferences with plaintiff's counsel regarding upcoming case management conference.	0.40	\$140.78	\$56.31
Service	03/23/2021	Communications with plaintiff's counsel regarding service of answer and affirmative defenses; forward same to plaintiff's counsel.	0.40	\$140.78	\$56.31
			Quantity Subtotal		0.8
			Subtotal		\$112.62

00696-City of Rock Island

Public Works matters

Type	Date	Notes	Quantity	Rate	Total
Service	03/08/2021	Conference call with DGM and IDNR representative regarding response to lease termination options.	0.20	\$140.78	\$28.16
Service	03/15/2021	Review correspondence from IDNR regarding lease termination procedures.	0.40	\$140.78	\$56.31
Service	03/17/2021	Conference call with client representatives regarding correspondence from IDNR detailing lease termination process and possible courses of action regarding same.	1.00	\$140.78	\$140.78
Service	03/18/2021	Receive and review IDNR access agreement proposal; conference with DGM regarding same.	0.60	\$140.78	\$84.47
Service	03/23/2021	Communications with client representatives regarding meeting with expert.	0.20	\$140.78	\$28.16

Quantity Subtotal **2.4**
Subtotal **\$337.88**

00697-City of Rock Island

Governance matters

Type	Date	Notes	Quantity	Rate	Total
Service	03/26/2021	Review statutes, ordinances, policies, and guidance documents regarding reimbursement of council expenses; conference with DGM regarding same.	1.50	\$140.78	\$211.17
			Quantity Subtotal		1.5
			Subtotal		\$211.17

00584-City of Rock Island Attn: Human Resources

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Type	Date	Notes	Quantity	Rate	Total
Service	03/03/2021	Department head meeting	0.75	\$140.78	\$105.59
Service	03/15/2021	telephone conference with City manager and Jerry Jones regarding human rights commission	0.50	\$140.78	\$70.39
Service	03/17/2021	Dept. head meeting	1.00	\$140.78	\$140.78
			Quantity Subtotal		2.25
			Subtotal		\$316.76

00708-City of Rock Island

THinc Mgt litigation

Type	Date	Notes	Quantity	Rate	Total
Service	03/01/2021	completed research and review of case materials and composed settlement conference memorandum per court order	3.25	\$140.78	\$457.54
Service	03/01/2021	Conferences with DGM regarding strategy for	0.80	\$140.78	\$112.62

		mediation submission; review same; conference with DGM and client representative regarding same.			
Service	03/02/2021	telephone conference with city manager about settlement conference	0.30	\$140.78	\$42.23
Service	03/04/2021	Conferences with DGM regarding 'prevailing party' and ultra vires arguments for settlement conference; legal research regarding prejudgment interest; receive and review order regarding settlement.	0.70	\$140.78	\$98.55
Service	03/04/2021	THINC Management v. City of Rock Island settlement conference	2.25	\$140.78	\$316.76
Service	03/16/2021	Revisions to draft release.	0.40	\$140.78	\$56.31
Service	03/18/2021	Review correspondence and timeline in preparation for client communication.	0.60	\$140.78	\$84.47
			Quantity Subtotal		8.3
				Subtotal	\$1,168.48

00710-City of Rock Island

Inspections matters

Type	Date	Notes	Quantity	Rate	Total
Service	03/03/2021	meeting Lori Clark meeting at residence during inspections with attorney Nick Mason present for homeowner.	1.00	\$140.78	\$140.78
			Quantity Subtotal		1.0
				Subtotal	\$140.78

00713-City of Rock Island

Augustana sewer case

Type	Date	Notes	Quantity	Rate	Total
Service	03/01/2021	Conference call with DGM and client representative regarding expert's document request.	0.30	\$140.78	\$42.23
Service	03/03/2021	Telephone conference with expert regarding meeting with staff to review documents; receive and review follow-up communications regarding same.	0.50	\$140.78	\$70.39

Service	03/15/2021	Communications regarding meeting with expert, pandemic exposure, and related matters.	0.50	\$140.78	\$70.39
Service	03/29/2021	Communications with client representatives regarding scheduling meeting with expert.	0.40	\$140.78	\$56.31
			Quantity Subtotal		1.7
			Subtotal		\$239.32

00718-City of Rock Island Foreclosures

Foreclosures

Type	Date	Notes	Quantity	Rate	Total
Service	03/25/2021	Laredo search 1425 34th Avenue. Email to Catlin, Jen, Nichole, Christine and Colleen.	0.30	\$71.44	\$21.43
Expense	03/25/2021	Laradeo charges searching Foreclosures.	1.00	\$3.00	\$3.00
Service	03/25/2021	Laredo Searches for Foreclosures.	0.50	\$71.44	\$35.72
			Quantity Subtotal		0.8
			Subtotal		\$60.15

00722-City of Rock Island

McGhee v. Mumma and Shappard

Type	Date	Notes	Quantity	Rate	Total
Service	03/01/2021	Receive and review plaintiff's motion for status.	0.20	\$140.78	\$28.16
Service	03/08/2021	Legal research regarding possible reply to plaintiff's unorthodox response to summary judgment motion; draft memorandum regarding strategic options for reply.	3.00	\$140.78	\$422.34
Service	03/25/2021	Receive and review docket entry from federal court regarding grant of summary judgment motion; communications with client representatives regarding same.	0.50	\$140.78	\$70.39
Service	03/26/2021	Receive and review clerk's final order of dismissal of case.	0.20	\$140.78	\$28.16
			Quantity Subtotal		3.9
			Subtotal		\$549.05

00725-City of Rock Island**O'Neil motorcycle crash**

Type	Date	Notes	Quantity	Rate	Total
Service	03/01/2021	Work on discovery responses.	3.00	\$140.78	\$422.34
Service	03/03/2021	Telephone conference with client representative regarding documents for production in discovery.	0.20	\$140.78	\$28.16
Service	03/08/2021	Communications with client representative regarding proof of insurance; receive and review certificate of insurance.	0.40	\$140.78	\$56.31
Service	03/18/2021	Receive and review several subpoenas for plaintiff's medical records.	0.60	\$140.78	\$84.47
Service	03/30/2021	Prepare for and depose plaintiff.	3.20	\$140.78	\$450.50
Quantity Subtotal					7.4
Subtotal					\$1,041.78

00768-City of Rock Island**Anthony Gay 1983 action**

Type	Date	Notes	Quantity	Rate	Total
Service	03/22/2021	reviewed proposed answer, motion to strike and affirmative defenses	0.70	\$140.38	\$98.27
Service	03/22/2021	Work on finalizing answer to complaint; communications with client representative regarding additional occurrence videos; download and review same; secure directions for service of filings; coordinate filing and begin initial work on pre-trial matters.	2.00	\$140.38	\$280.76
Service	03/24/2021	Work on assembling information for initial disclosures; review court's HIPAA order and revise protective order in light of same.	3.50	\$140.38	\$491.33
Service	03/25/2021	Review federal rules for initial disclosures and related procedures; work on document assembly for production; conference with DGM regarding protective order; letter to pro se plaintiff regarding same.	2.40	\$140.38	\$336.91
Quantity Subtotal					8.6

Subtotal \$1,207.27

00770-City of Rock Island

RIPD matters

Type	Date	Notes	Quantity	Rate	Total
Service	03/02/2021	Office conference with DGM, chief, and officers regarding internal investigation matter; legal research regarding potential liabilities.	2.40	\$140.78	\$337.87
Service	03/02/2021	Office conference with Hector, chief, and officers regarding internal investigation matter; legal research regarding potential liabilities.	1.25	\$140.78	\$175.98
Service	03/03/2021	Review case law; draft memorandum to client representative regarding impeachment of officers.	1.80	\$140.38	\$252.68
Quantity Subtotal					5.45
Subtotal					\$766.53

00777-City of Rock Island

Human Rights Commission matters

Type	Date	Notes	Quantity	Rate	Total
Service	03/15/2021	telephone conference regarding human rights commission ordinance and review email with proposed ordinance and hearing procedure	0.80	\$140.78	\$112.62
Service	03/18/2021	Receive and review draft ordinance and script for hearing process; conference with DGM regarding same; quickly compare to other municipal ordinances; conference call regarding next steps.	1.60	\$140.78	\$225.25
Service	03/23/2021	Detailed review of proposed ordinance; legal research regarding certain provisions included in and missing from same; draft memorandum regarding viability of ordinance.	4.30	\$140.78	\$605.35
Service	03/23/2021	Communications with client representative regarding timing of analysis of proposed ordinance.	0.40	\$140.78	\$56.31
Service	03/24/2021	Conference with DGM regarding his research and analysis; revisions to client communications regarding same; forward same to client representative for review.	1.60	\$140.78	\$225.25
Service	03/29/2021	Legal research regarding Salazar injunction currently in	0.50	\$140.78	\$70.39

place against IDHR; conference with DGM regarding same.

Quantity Subtotal 9.2

Subtotal \$1,295.17

00785-City of Rock Island

Bolden IDHR complaint

Type	Date	Notes	Quantity	Rate	Total
Service	03/29/2021	Research regarding IDHR procedures; conference with DGM regarding same and regarding position statement to IDHR; communications with client representatives regarding meeting to go over information requested by IDHR.	1.50	\$140.78	\$211.17
Service	03/30/2021	Communications with client representatives regarding assembling information for response to IDHR; research regarding same.	0.50	\$140.78	\$70.39
Service	03/31/2021	review materials and letter from Illinois HR Commission and requested documents	0.40	\$140.78	\$56.31
			Quantity Subtotal		2.4
				Subtotal	\$337.87

00783-City of Rock Island

Ravelingeen drowning

Type	Date	Notes	Quantity	Rate	Total
Service	03/29/2021	Receive and review complaint; begin work on answer; telephone conference with plaintiff's counsel regarding pre-answer discovery request.	1.20	\$140.78	\$168.94
			Quantity Subtotal		1.2
				Subtotal	\$168.94
			Quantity Total		92.5
				Total	\$12,520.86

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
290	04/12/2021	\$12,520.86	\$0.00	\$12,520.86
			Outstanding Balance	\$12,520.86
			Total Amount Outstanding	\$12,520.86

Please make all amounts payable to: David G. Morrison

Please pay within 12 days.