

Morrison, Marquis, Campbell, Lareau & Weng

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

INVOICE

Invoice # 329
Date: 07/07/2021
Due On: 07/21/2021

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	06/03/2021	Receive and review PAC review letter; review documents related; prepare first draft of letter responding to PAC counsel.	0.80	\$140.78	\$112.62
Service	06/04/2021	Communications with RIPD regarding response to PAC review and rationale for denial.	0.40	\$140.78	\$56.31
Service	06/04/2021	Communications with RIPD FOIA officer regarding two new requests; legal research regarding same.	0.60	\$140.78	\$84.47
Service	06/07/2021	Telephone conference with FOIA officer regarding subpoena and several pending FOIA requests; revisions to PAC response letter; transmit same.	1.40	\$140.78	\$197.09
Service	06/08/2021	Receive and review communications from PAC Counsel to requester regarding possible mootness.	0.20	\$140.78	\$28.16
Service	06/10/2021	Communications with PAC Counsel regarding time to provide video.	0.30	\$140.78	\$42.23
Service	06/14/2021	Receive and review communications from PAC Counsel regarding production of video recordings; forward same to client representatives.	0.30	\$140.78	\$42.23
Service	06/14/2021	Conference call with DGM and client representative regarding pending response and possible redactions.	0.30	\$140.78	\$42.23
Service	06/21/2021	Receive and review requests regarding homicide and follow-up response regarding inmate request; telephone conference with FOIA officer regarding three complex pending requests.	1.00	\$140.78	\$140.78
Service	06/24/2021	Legal research regarding availability of executive	0.80	\$140.78	\$112.62

		session to discuss employee benefits.			
Service	06/28/2021	Review draft response letters and provide feedback to client representatives.	0.40	\$140.78	\$56.31
			Quantity Subtotal		6.5
			Subtotal		\$915.05

00002-City of Rock Island

Chavez wrongful death

Type	Date	Notes	Quantity	Rate	Total
Service	06/09/2021	Receive and review supplemental response to request for production from plaintiff.	0.20	\$140.78	\$28.16
Service	06/22/2021	Receive and review request for re-transmittal of electronic discovery data; assemble and transmit same.	0.40	\$140.78	\$56.31
Service	06/24/2021	Communications from plaintiff's counsel regarding evidence (canoe) being released from IDNR and into possession of plaintiff's counsel; receive and review response from third-party defendant's counsel regarding same; respond to same.	0.60	\$140.78	\$84.47
			Quantity Subtotal		1.2
			Subtotal		\$168.94

00005-City of Rock Island

CED matters

Type	Date	Notes	Quantity	Rate	Total
Service	06/01/2021	Legal research and response regarding abatement of dangerous property.	1.20	\$140.78	\$168.94
Service	06/02/2021	Communications regarding repairs and reinforcement of hazardous building.	0.40	\$140.78	\$56.31
Service	06/03/2021	Receive and review direction from City Manager regarding notice to abate to owner; telephone conference with CED director regarding service information; receive and review MUNICES documents; telephone conference with inspector regarding change of address; draft letter.	1.00	\$140.78	\$140.78

Service	06/07/2021	Finalize letter regarding hazardous property.	0.20	\$140.78	\$28.16
Service	06/10/2021	hydro plant meeting	1.00	\$140.78	\$140.78
Service	06/11/2021	conference regarding hydro plant	1.00	\$140.78	\$140.78
Service	06/16/2021	review correspondence and documents attached to email regarding listings of U-Haul property out-lots and owner's assertion of compliance	0.30	\$140.78	\$42.23
Service	06/18/2021	research on annexation and disconnection in preparation for meeting Friday afternoon	1.50	\$140.78	\$211.17
Service	06/18/2021	meeting on 2nd floor of city hall in ced conference room on disconnection and related matters	2.00	\$140.78	\$281.56
Service	06/20/2021	conference regarding hydro plant	48.22	\$140.78	\$6,788.41
Service	06/25/2021	Conference with DGM regarding contract and proposed revision; communications with client representatives regarding same.	0.30	\$140.78	\$42.23
Service	06/29/2021	meeting at CED to discuss zoning issues and special activity permit process for lots more than 10 acres south of Rock River.	1.50	\$140.78	\$211.17
Quantity Subtotal					58.62
Subtotal					\$8,252.52

00007-City of Rock Island

Steel Dam lease

Type	Date	Notes	Quantity	Rate	Total
Service	06/02/2021	Receive and review communications from FERC regarding surrender application.	0.30	\$140.78	\$42.23
Service	06/07/2021	Receive and review correspondence between client representative and FERC representative.	0.20	\$140.78	\$28.16
Service	06/10/2021	Conference call regarding several pending matters due to FERC and how to approach legal strategy for same.	1.00	\$140.78	\$140.78
Service	06/11/2021	Receive and review draft letter to FERC regarding exemption surrender; suggest revisions to same.	0.50	\$140.78	\$70.39
Service	06/14/2021	Further revisions to letter to FERC.	0.40	\$140.78	\$56.31
Quantity Subtotal					2.4
Subtotal					\$337.87

00011-City of Rock Island**MUNICES**

Type	Date	Notes	Quantity	Rate	Total
Expense	06/03/2021	Record Certificate of Judgment.	1.00	\$55.00	\$55.00
Service	06/10/2021	Review file on 948 20th Avenue. Telephone conference with Tim Delathower and Prepare Release of Judgment for signature. Research Laredo.	0.75	\$71.44	\$53.58
Expense	06/10/2021	Pacer Charges	1.00	\$2.25	\$2.25
Service	06/16/2021	Prepare 6 Notice of Registration of Administrative Judgments. Emails to Tim and Jen. Scan all documents for filing and filed the same. Properties 1023 14th Street, 4516 5th Avenue, 1117 15th Avenue, 1603 12th Avenue, 818 7th Avenue, 1322 14th Street.	3.75	\$71.44	\$267.90
Service	06/17/2021	Prepare 6 Municies Judgments for filing Documents and file with Rock Island County Clerk.	1.75	\$71.44	\$125.02
Expense	06/17/2021	Recorder of Deeds. File 6 Certificate of Judgments for Municies 4516 5th Avenue; 1117 15th Avenue; 1603 12th Avenue; 818 7th Avenue; 1023 14th Street; 1025 17th Avenue.	6.00	\$55.00	\$330.00
Expense	06/21/2021	Certified Mail, regarding 2201 45th Street.	1.00	\$6.96	\$6.96
Quantity Subtotal					6.25
Subtotal					\$840.71

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

Type	Date	Notes	Quantity	Rate	Total
Service	06/01/2021	Receive and review correspondence regarding settlement negotiations.	0.30	\$140.78	\$42.23
Service	06/09/2021	Telephone conferences with counsel regarding status and next steps.	0.40	\$140.78	\$56.31
Service	06/15/2021	Telephone conference with plaintiff's counsel regarding mediation.	0.20	\$140.78	\$28.16
Service	06/16/2021	Communications with counsel and mediator to schedule mediation, conditions of same, submissions,	0.80	\$140.78	\$112.62

etc.					
Service	06/17/2021	Assemble submissions to mediator regarding mediation; follow-up communications regarding same.	0.40	\$140.78	\$56.31
			Quantity Subtotal		2.1
			Subtotal		\$295.63

00018-City of Rock Island

Rock Island Realty

Type	Date	Notes	Quantity	Rate	Total
Service	06/04/2021	Receive and review detailed settlement conference order from federal judge.	0.20	\$140.78	\$28.16
			Quantity Subtotal		0.2
			Subtotal		\$28.16

00022-City of Rock Island

Scott v. Backwater Gamblers

Type	Date	Notes	Quantity	Rate	Total
Service	06/09/2021	Communications with counsel representing City as additional insured regarding status.	0.40	\$140.78	\$56.31
			Quantity Subtotal		0.4
			Subtotal		\$56.31

00025-City of Rock Island

Estrada & Joy

Type	Date	Notes	Quantity	Rate	Total
Service	06/09/2021	Communications with co-defendant's counsel regarding motion for summary judgment, whether fact discovery is concluded, what experts to anticipate from plaintiff, and retained expert for defense.	0.50	\$140.78	\$70.39

Service	06/24/2021	Receive and review email thread from client representative regarding status reporting to reinsurer; communications with adjuster regarding same.	0.40	\$140.78	\$56.31
Service	06/28/2021	Detailed review of discovery; draft and transmit status report to reinsurer.	1.20	\$140.78	\$168.94
			Quantity Subtotal		2.1
			Subtotal		\$295.64

00021-City of Rock Island

Danielle Herber slip and fall on ped mall

Type	Date	Notes	Quantity	Rate	Total
Service	06/02/2021	Finalize discovery responses; prepare and file notice of service; transmit discovery responses and exhibits to all counsel.	0.50	\$140.78	\$70.39
Service	06/03/2021	Receive and review DARI's discovery requests to plaintiff.	0.30	\$140.78	\$42.23
Service	06/25/2021	Communications with newly appearing counsel regarding transmission of pleadings and discovery developed before appearance; communications with other counsel regarding same.	0.80	\$140.78	\$112.62
			Quantity Subtotal		1.6
			Subtotal		\$225.24

00019-City of Rock Island

Beverly McAninch police chase

Type	Date	Notes	Quantity	Rate	Total
Service	06/01/2021	telephone conference with Mike Warner regarding protective order and discovery issues	0.30	\$140.78	\$42.23
Service	06/01/2021	Communications regarding discovery and protective order; review discovery, subpoena responses, and surveillance; work on status report to reinsurer.	2.20	\$140.78	\$309.72
Service	06/02/2021	Conference with DGM regarding 201(k) conference with plaintiff's counsel regarding protective order; draft motion for protective order; forward same for review.	2.20	\$140.78	\$309.72

Service	06/04/2021	Finalize, file, and serve motion for protective order.	4.00	\$140.78	\$563.12
Service	06/23/2021	Communications with client representative regarding notice to re-insurer.	0.20	\$140.78	\$28.16
Service	06/24/2021	Telephone conference with plaintiff's counsel regarding HIPAA order and related discovery protections.	0.30	\$140.78	\$42.23
				Quantity Subtotal	9.2
				Subtotal	\$1,295.18

00028-City of Rock Island

Sherry Brown v. City

Type	Date	Notes	Quantity	Rate	Total
Service	06/14/2021	Receive and review communications from IPMG regarding claim falling outside coverage; forward same to client representative with direction to provide notice to previous reinsurer.	0.40	\$140.78	\$56.31
				Quantity Subtotal	0.4
				Subtotal	\$56.31

00697-City of Rock Island

Governance matters

Type	Date	Notes	Quantity	Rate	Total
Service	06/03/2021	Communications regarding retention of special counsel for class action matter.	0.30	\$140.78	\$42.23
Service	06/16/2021	Question from client representative regarding challenge to noise ordinance; review briefs submitted with same; conduct research regarding precedential value of case; telephone conference with clerk regarding retrieving orders from 2003; communications with client representative regarding results of research.	1.20	\$140.78	\$168.94
Service	06/25/2021	Receive and review request from alderman requesting analysis of ethics issue.	0.20	\$140.78	\$28.16
Service	06/28/2021	Legal research and consultations with IML counsel, client representative, and DGM regarding structure, effect, and constraints on civilian-police committee.	1.80	\$140.78	\$253.40

Service	06/29/2021	Continue legal research regarding ethics question presented by alderman.	1.00	\$140.78	\$140.78
Service	06/30/2021	Finish legal research and draft memorandum responding to alderman inquiry on ethics question.	4.00	\$140.78	\$563.12
				Quantity Subtotal	8.5
				Subtotal	\$1,196.63

00584-City of Rock Island Attn: Human Resources

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Type	Date	Notes	Quantity	Rate	Total
Service	06/02/2021	Meeting with John Thorson and Chris Castelein.	1.00	\$140.78	\$140.78
Service	06/09/2021	Meeting with insurer regarding claims handling and procedures for handling litigation.	1.20	\$140.78	\$168.94
Service	06/09/2021	meeting with IMPG Bob Spring	1.20	\$140.78	\$168.94
Service	06/10/2021	Communications with IPMG regarding recently filed cases and assignment of counsel for same.	0.20	\$140.78	\$28.16
Service	06/23/2021	Dept. Head meeting	0.75	\$140.78	\$105.59
				Quantity Subtotal	4.35
				Subtotal	\$612.41

00713-City of Rock Island

Augustana sewer case

Type	Date	Notes	Quantity	Rate	Total
Service	06/07/2021	Communications with counsel regarding time to respond to supplemental document requests; communications regarding supplement to original production requests.	0.40	\$140.78	\$56.31
Service	06/09/2021	Receive and review supplemental document production from plaintiff; forward same to expert for review.	0.50	\$140.78	\$70.39
Service	06/10/2021	Communications with reinsurer counsel regarding upcoming representative depositions.	0.20	\$140.78	\$28.16
Service	06/11/2021	Telephone conference with court reporter regarding	0.20	\$140.78	\$28.16

		upcoming representative deposition and information she needs for zoom matters.			
Service	06/16/2021	Communications with counsel regarding upcoming depositions.	0.20	\$140.78	\$28.16
Service	06/17/2021	Communications with counsel regarding rescheduling and substance of R. 26 conference.	0.30	\$140.78	\$42.23
Service	06/18/2021	communications with counsel for third-party defendant regarding upcoming depositions.	0.30	\$140.78	\$42.23
Service	06/21/2021	telephone conference to discuss designation of witnesses with plaintiff's counsel William Rector	0.50	\$140.78	\$70.39
Service	06/21/2021	Conference call with counsel to narrow questions for representative deposition; file and serve notice of same.	1.00	\$140.78	\$140.78
Service	06/22/2021	Detailed review of over one thousand pages of discovery responses in preparation for representative deposition.	3.30	\$140.78	\$464.57
Service	06/23/2021	deposition of Chief Financial Officer (designee for Augustana College) pursuant to S. Ct. Rule	1.25	\$140.78	\$175.98
Service	06/23/2021	Finish preparing for and take deposition of Augustana representative.	3.60	\$140.78	\$506.81
Service	06/25/2021	Appear for depositions of representative witnesses.	4.80	\$140.78	\$675.74
Service	06/30/2021	Receive and review proposed deposition exhibits from plaintiff's counsel for next day's deposition.	0.40	\$140.78	\$56.31
Quantity Subtotal					16.95
Subtotal					\$2,386.22

00714-City of Rock Island

Brandt Construction declaratory judgment action

Type	Date	Notes	Quantity	Rate	Total
Service	06/10/2021	Legal research in preparation for motion for summary judgment.	2.00	\$140.78	\$281.56
Service	06/11/2021	Begin drafting motion for summary judgment; detailed review of video recordings of relevant city council meeting	2.50	\$140.78	\$351.95
Service	06/14/2021	Finish legal research and all factual work apart from necessary affidavit; finish draft of motion for summary judgment.	3.00	\$140.78	\$422.34

Service	06/18/2021	review motion for summary judgment	0.50	\$140.78	\$70.39
Service	06/22/2021	Finalize summary judgment motion; secure affidavit from client representative; file and serve same.	1.90	\$140.78	\$267.48
			Quantity Subtotal		9.9
			Subtotal		\$1,393.72

00718-City of Rock Island Foreclosures

Foreclosures

Type	Date	Notes	Quantity	Rate	Total
Expense	06/15/2021	Laredo searches on Foreclosures. Pull Documents to close City files on Foreclosed properties that have sold at sheriff sale, sold or have been dismissed.	1.00	\$5.00	\$5.00
Service	06/15/2021	Searched Laredo on Foreclosure properties. Pull Documents on Foreclosures that have sold at sheriff sale, sold or have been dismissed. Scanned all documents and emails to Caitlin, Jen, Christine and Nichole. (This is just a partial of all foreclosures the City has more to come.)	2.50	\$71.44	\$178.60
			Quantity Subtotal		2.5
			Subtotal		\$183.60

00725-City of Rock Island

O'Neil motorcycle crash

Type	Date	Notes	Quantity	Rate	Total
Service	06/03/2021	Draft letter to QC Towing counsel tendering defense.	0.30	\$140.78	\$42.23
			Quantity Subtotal		0.3
			Subtotal		\$42.23

00732-City of Rock Island

Liquor Commission matters

Type	Date	Notes	Quantity	Rate	Total
Service	06/25/2021	Legal research regarding restrictions on BYOB facilities.	0.50	\$140.78	\$70.39
Service	06/28/2021	Legal research regarding permissible scope of BYOB regulation, possible conflict with state liquor control act, and home rule authority.	0.70	\$140.78	\$98.55
Service	06/29/2021	Finish research and draft memorandum regarding options for BYOB regulation.	1.90	\$140.78	\$267.48
Quantity Subtotal					3.1
Subtotal					\$436.42

00765-City of Rock Island Tax Exempt Properties

Tax Exempt Property

Type	Date	Notes	Quantity	Rate	Total
Service	06/14/2021	Received 4 Take Notices. Searched Laredo and sent to Colleen and Caitlin. 1036 14th Street, 1006 33rd Avenue, 715 15th Street, 708 4th Street.	1.50	\$71.44	\$107.16
Quantity Subtotal					1.5
Subtotal					\$107.16

00768-City of Rock Island

Anthony Gay 1983 action

Type	Date	Notes	Quantity	Rate	Total
Service	06/10/2021	Receive and review executed agreed protective order; coordinate filing and service of same.	0.40	\$140.38	\$56.15
Service	06/18/2021	Conference call with DGM and plaintiff regarding discovery responses; telephone conference with clerk of court regarding entry of protective order.	0.60	\$140.38	\$84.23
Service	06/23/2021	Telephone conference with clerk of court inquiring when protective order would be entered.	0.30	\$140.38	\$42.11
Quantity Subtotal					1.3
Subtotal					\$182.49

00770-City of Rock Island**RIPD matters**

Type	Date	Notes	Quantity	Rate	Total
Service	06/02/2021	Conference with DGM regarding expungement issues; communications with client representative regarding same.	0.40	\$140.38	\$56.15
Service	06/16/2021	Communications regarding upcoming meeting concerning new expungement requirements.	0.30	\$140.38	\$42.11
Service	06/17/2021	Prepare for and attend meeting regarding expungements.	2.40	\$140.38	\$336.91
Service	06/29/2021	Review nuisance abatement letter; quick legal research regarding same; respond to deputy chief regarding same.	0.60	\$140.38	\$84.23
			Quantity Subtotal		3.7
				Subtotal	\$519.40

00785-City of Rock Island**Bolden IDHR complaint**

Type	Date	Notes	Quantity	Rate	Total
Expense	06/03/2021	Fed Ex Overnight Mail.	1.00	\$26.95	\$26.95
			Subtotal		\$26.95

00783-City of Rock Island**Ravelingeen drowning**

Type	Date	Notes	Quantity	Rate	Total
Service	06/11/2021	Telephone conference with counsel regarding possible conflict arising from substitution and other aspects of the case.	0.30	\$140.78	\$42.23
Service	06/15/2021	Telephone conferences with ISBA and ARDC ethics hotlines; independent legal research regarding disqualification.	1.00	\$140.78	\$140.78

Service	06/21/2021	Receive and review several documents from excess carrier counsel regarding potential experts and budget for same; prepare substitution of counsel; conference call with DGM and counsel regarding expert and affirmative defenses.	1.40	\$140.78	\$197.09
Service	06/23/2021	Telephone conference with counsel regarding additional affirmative defenses and unsigned substitution order.	0.40	\$140.78	\$56.31
Service	06/24/2021	Telephone conference with clerk of court regarding lack of signature on order; receive and review signed order; forward same to re-insurer's counsel.	0.60	\$140.78	\$84.47
				Quantity Subtotal	3.7
				Subtotal	\$520.88

00796-City of Rock Island

Jermaine Jones 1983 action

Type	Date	Notes	Quantity	Rate	Total
Service	06/02/2021	Receive and review new 1983 action, merit review order, and tender of defense; communications with client representative regarding reports and video associated with events.	0.80	\$140.78	\$112.62
Service	06/04/2021	Communications with deputy chief regarding new case; receive and review reports regarding same.	0.50	\$140.78	\$70.39
Service	06/11/2021	Communications with client representative regarding notice to reinsurer concerning §1983 action.	0.20	\$140.78	\$28.16
				Quantity Subtotal	1.5
				Subtotal	\$211.17
				Quantity Total	148.27
				Total	\$20,586.84

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
329	07/21/2021	\$20,586.84	\$0.00	\$20,586.84
Outstanding Balance				\$20,586.84
Total Amount Outstanding				\$20,586.84

Please make all amounts payable to: David G. Morrison

Please pay within 14 days.