

Morrison, Marquis, Campbell, Lareau & Weng

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

INVOICE

Invoice # 474
Date: 02/01/2022
Due On: 02/15/2022

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	01/06/2022	Receive and review executed order for release of juvenile records; communications regarding same with FOIA officer.	0.50	\$140.78	\$70.39
Service	01/07/2022	Communications with client representative regarding response to subpoena.	0.30	\$140.78	\$42.23
Service	01/10/2022	Communications with client representative regarding subpoena response; receive and review report regarding same; forward same to counsel. Respond to client question regarding subpoena issued by Illinois State Board of Education.	1.00	\$140.78	\$140.78
Service	01/12/2022	Pick up optical disk from RIPD; copy same; telephone conference with and hand deliver to counsel who issued subpoena; telephone conference with client representative regarding follow-up request; receive and forward responsive documents regarding same.	1.00	\$140.78	\$140.78
			Quantity Subtotal		2.8
				Subtotal	\$394.18

00002-City of Rock Island

Chavez wrongful death

Type	Date	Notes	Quantity	Rate	Total
Service	01/25/2022	Conference regarding strategies for deposition of plaintiff's ex-husband; receive and review 15th supplemental response to request for production; review assignment correspondence to private investigator regarding occurrence witnesses.	0.90	\$140.78	\$126.70
Service	01/26/2022	Work on requests for admission to plaintiff regarding FERC letter; conference with DGM regarding depositions of FERC personnel; communications with supervising counsel regarding self-authentication of FERC documents.	1.40	\$140.78	\$197.09
Service	01/28/2022	Check on status of eLibrary filing of request for admission documents; telephone conference with client representative regarding same; correspondence to supervising counsel regarding tactics concerning admissions.	0.80	\$140.78	\$112.62
Service	01/30/2022	review depo transcripts	4.25	\$140.78	\$598.32
Quantity Subtotal					7.35
Subtotal					\$1,034.73

00005-City of Rock Island

CED matters

Type	Date	Notes	Quantity	Rate	Total
Service	01/04/2022	Receive and review motion to vacate default judgment; telephone conference with attorney for Roemer regarding same and regarding next steps; conference call with DGM and client representatives; communications with client representatives regarding emergency contract.	1.00	\$140.78	\$140.78
Service	01/11/2022	Review Notice of Hearings on 5 Tax Petition Properties, 2830 8th Avenue, 1614 12th Avenue, 1206 17th Street, 1030 21st Avenue, and Water Tower, Searched all properties in Laredo and email to Caitlin, Colleen and Miles.	1.75	\$71.44	\$125.02
Service	01/12/2022	initial research and review regarding CRLIF loans	0.80	\$140.78	\$112.62
Service	01/12/2022	Conference call with building inspector regarding options to address risks with Best Building.	0.30	\$140.78	\$42.23
Service	01/12/2022	Start research on Assessment page, regarding Tax Exempt Properties.	1.50	\$71.44	\$107.16
Service	01/13/2022	research, review loan documents and mortgage and	2.20	\$140.78	\$309.72

draft extension of obligation document					
Service	01/15/2022	Continue working on Tax Exempt Properties Search Laredo for each individual property.	4.50	\$71.44	\$321.48
Service	01/16/2022	Continued to work on Tax Exempt Properties. (226) properties to search.	5.00	\$71.44	\$357.20
Service	01/18/2022	meeting to discuss munices matter and Best Building	1.00	\$140.78	\$140.78
Service	01/18/2022	Meeting with Alan Fries, Miles Brainard and Building inspector regarding code enforcement matter	0.80	\$140.78	\$112.62
Service	01/20/2022	Meeting with Miles and Tara to discuss property purchase issue.	0.30	\$71.44	\$21.43
Service	01/21/2022	Continued searches of City owned properties. 31 properties left to search and determine.	4.00	\$71.44	\$285.76
Service	01/21/2022	Finished property searches for Assessors Office. Combined and drew up clean copy for filing with Assessors Office.	1.50	\$71.44	\$107.16
Service	01/24/2022	meeting with CED, inspections and city manager	0.50	\$140.78	\$70.39
Service	01/24/2022	Office conference with client representatives regarding next steps on protecting pedestrians.	0.60	\$140.78	\$84.47
Service	01/26/2022	Prepare Notice of Default for property sale. Email to David Morrison and Miles for approval.	0.20	\$71.44	\$14.29
Expense	01/26/2022	Certified mail to Stevenson Notice of Default.	1.00	\$8.36	\$8.36
Service	01/31/2022	Communications regarding proposed land donation; review map regarding same.	0.20	\$140.78	\$28.16
Service	01/31/2022	Communications with owner's counsel regarding Best Building litigation.	0.20	\$140.78	\$28.16
Quantity Subtotal					26.35
Subtotal					\$2,417.79

00006-City of Rock Island

Payne action for flood damages

Type	Date	Notes	Quantity	Rate	Total
Service	01/06/2022	Receive and review plaintiff's exhibit list; review jury instructions and pretrial memorandum; submit same to clerk and court.	1.00	\$140.78	\$140.78
Service	01/10/2022	Prepare for closed session meeting with Council.	0.50	\$140.78	\$70.39

Service	01/11/2022	Prepare for and appear in Circuit Court for pre-trial conference.	1.40	\$140.78	\$197.09
			Quantity Subtotal		2.9
			Subtotal		\$408.26

00011-City of Rock Island

MUNICES

Type	Date	Notes	Quantity	Rate	Total
Expense	01/11/2022	Record Release of Judgment with Recorder of Deeds. 540 46th Street.	1.00	\$55.00	\$55.00
Service	01/12/2022	Went to Recorder of Deeds and filed Release of Certificate of Judgment.	0.20	\$71.44	\$14.29
Service	01/26/2022	Prepare and file Notice of Registration of Administration Judgment 914 14 1/2 Street.	0.50	\$71.44	\$35.72
Service	01/26/2022	Prepare and file Notice of Registration of Administration Judgment 1600 9th Street.	0.50	\$71.44	\$35.72
Expense	01/28/2022	Record Certificate of Judgment 1600 9th Street and 914 14 1/2 Street,	2.00	\$55.00	\$110.00
Service	01/28/2022	Prepare and file Certificate of Judgment filed with Rock Island County Clerk. Received return and prepared for filing with recorder of Deeds. 16600 9th Street, 914 14 1/2 Street.	1.25	\$71.44	\$89.30
Service	01/28/2022	Prepare Certified Mail for 14 1/2 Street Trust.	0.15	\$71.44	\$10.72
Expense	01/28/2022	Certified Mail 14 1/2 Street Trust. Municies Judgment Documents.	1.00	\$7.33	\$7.33
			Quantity Subtotal		2.6
			Subtotal		\$358.08

00025-City of Rock Island

Estrada & Joy

Type	Date	Notes	Quantity	Rate	Total
Service	01/18/2022	Communications with all counsel regarding case management conference and deposition dates.	0.60	\$140.78	\$84.47

Service	01/19/2022	Communications with client representatives regarding availability for deposition.	0.40	\$140.78	\$56.31
Service	01/20/2022	Communications with counsel regarding depositions of Augustana personnel.	0.40	\$140.78	\$56.31
Service	01/26/2022	Communications with counsel regarding depositions of City witnesses.	0.40	\$140.78	\$56.31
Expense	01/31/2022	Deposition transcript for Estrada and Joy. from Paszkiewicz Court Reporting.	1.00	\$503.65	\$503.65
Quantity Subtotal					1.8
Subtotal					\$757.05

00021-City of Rock Island

Danielle Herber slip and fall on ped mall

Type	Date	Notes	Quantity	Rate	Total
Service	01/10/2022	Receive and review voluminous discovery responses from Quality Construction.	0.50	\$140.78	\$70.39
Service	01/11/2022	Receive and review further discovery responses.	0.30	\$140.78	\$42.23
Quantity Subtotal					0.8
Subtotal					\$112.62

00019-City of Rock Island

Beverly McAninch police chase

Type	Date	Notes	Quantity	Rate	Total
Service	01/04/2022	Receive and review executed release and stipulation for dismissal; forward same to City Clerk.	0.40	\$140.78	\$56.31
Quantity Subtotal					0.4
Subtotal					\$56.31

00028-City of Rock Island**Sherry Brown v. City**

Type	Date	Notes	Quantity	Rate	Total
Service	01/11/2022	Communications with plaintiff's counsel regarding deposition of mother.	0.40	\$140.78	\$56.31
			Quantity Subtotal		0.4
			Subtotal		\$56.31

00031-City of Rock Island**Municipal contracts**

Type	Date	Notes	Quantity	Rate	Total
Service	01/06/2022	Prepare Release of Municipies Judgment 540 46th Street.	0.30	\$71.44	\$21.43
			Quantity Subtotal		0.3
			Subtotal		\$21.43

00697-City of Rock Island**Governance matters**

Type	Date	Notes	Quantity	Rate	Total
Service	01/04/2022	meeting with city officials to prepare for meeting with Attorney for Appellant and Appellant in Liquor Commission Appeal	0.50	\$140.78	\$70.39
Service	01/04/2022	meeting with city officials and Appellant and Appellant's attorney to discuss possible resolution of pending appeal to State Liquor Commission.	0.50	\$140.78	\$70.39
Service	01/05/2022	Dept Head Meeting	1.00	\$140.78	\$140.78
Service	01/10/2022	research on appointment of new council member and related issues	0.50	\$140.78	\$70.39
Service	01/10/2022	work on preparation of Temp restraining order/ preliminary injunction regarding open burning	1.50	\$140.78	\$211.17

		complaints and citations and telephone calls with Fire Marshall and respondent			
Service	01/19/2022	Department Head meeting	0.50	\$140.78	\$70.39
Service	01/24/2022	Legal research and analysis regarding application of ethics act to contract for services.	2.00	\$140.78	\$281.56
Service	01/26/2022	Work on ethics question regarding employee interest in contract.	0.70	\$140.78	\$98.55
Service	01/27/2022	Detailed review of cases and statutes.	1.20	\$140.78	\$168.94
Service	01/31/2022	revisions to memorandum regarding possible conflicts.	1.00	\$140.78	\$140.78
			Quantity Subtotal		9.4
				Subtotal	\$1,323.34

00584-City of Rock Island Attn: Human Resources

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Type	Date	Notes	Quantity	Rate	Total
Service	01/27/2022	research on issue of compatibility of offices and employee and officers. Reviewed statutes, IICLE and case law materials.	6.00	\$140.78	\$844.68
Service	01/30/2022	completed research and memo about incompatible offices and conflicts	1.20	\$140.78	\$168.94
			Quantity Subtotal		7.2
				Subtotal	\$1,013.62

00703-City of Rock Island

Bankruptcy Proceedings:

Type	Date	Notes	Quantity	Rate	Total
Service	01/23/2022	Review Chapter 11 plan and supporting financial documents, reviewed supplement to Chapter 11 bankruptcy plan received from debtor and reviewed city claims and proposed treatment of debts owed to city under plan	1.80	\$140.78	\$253.40
Service	01/26/2022	review filings and Chapter 11 plan and city ballot for acceptance or rejection of plan and reviewed city	0.80	\$140.78	\$112.62

claims against debtor					
Quantity Subtotal					2.6
Subtotal					\$366.02

00709-City of Rock Island

Clay v. Ledbetter

Type	Date	Notes	Quantity	Rate	Total
Service	01/05/2022	Communications with all counsel regarding upcoming hearing.	0.60	\$140.78	\$84.47
Service	01/06/2022	Conference call all counsel and court administration to reschedule hearing because of counsel's covid exposure.	0.50	\$140.78	\$70.39
Service	01/20/2022	Clay v. Ledbetter hearing motions to dismiss filed by city.	0.80	\$140.78	\$112.62
Quantity Subtotal					1.9
Subtotal					\$267.48

00713-City of Rock Island

Augustana sewer case

Type	Date	Notes	Quantity	Rate	Total
Service	01/03/2022	Conference with DGM regarding submission to mediator; communications with clerk regarding closed session before mediation; communications with excess counsel regarding mediation tactics and strategies.	1.00	\$140.78	\$140.78
Service	01/05/2022	Review pleadings and discovery; draft position statement to mediator.	1.00	\$140.78	\$140.78
Service	01/06/2022	Receive response from excess counsel regarding statement to mediator; assemble documents and video and transmit same to mediator.	0.50	\$140.78	\$70.39
Service	01/07/2022	Receive and review motion for summary judgment regarding affirmative defenses; communications regarding same with excess counsel.	0.80	\$140.78	\$112.62
Service	01/09/2022	Communications from mediator regarding missing document; locate same and forward to him for review.	0.50	\$140.78	\$70.39

Service	01/10/2022	Conference with DGM regarding preparation for closed session meeting with counsel; prepare visual and outline for same.	0.80	\$140.78	\$112.62
Service	01/14/2022	Communications with counsel regarding upcoming mediation.	0.40	\$140.78	\$56.31
Service	01/18/2022	Telephone conference with supervising counsel regarding arrangements for mediation.	0.30	\$140.78	\$42.23
Service	01/19/2022	mediation at Plaintiff counsel's office with mediator for mediation	6.50	\$140.78	\$915.07
Service	01/20/2022	Participate in mediation.	7.00	\$140.78	\$985.46
Service	01/25/2022	Receive and review correspondence from our expert.	0.20	\$140.78	\$28.16
Service	01/27/2022	Communications with mediator regarding timing of response to last offer.	0.20	\$140.78	\$28.16
			Quantity Subtotal		19.2
			Subtotal		\$2,702.97

00718-City of Rock Island Foreclosures

Foreclosures

Type	Date	Notes	Quantity	Rate	Total
Service	01/31/2022	Receive and review foreclosure notice for 4519 18th Avenue. Searched Laredo and email to City staff.	0.50	\$71.44	\$35.72
			Quantity Subtotal		0.5
			Subtotal		\$35.72

00747-City of Rock Island

Parks matters

Type	Date	Notes	Quantity	Rate	Total
Service	01/03/2022	Reviewed email from Todd Winter. Searched Properties. Telephone conference with Todd. No changes. Sign and return form.	0.75	\$71.44	\$53.58
			Quantity Subtotal		0.75
			Subtotal		\$53.58

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

Type	Date	Notes	Quantity	Rate	Total
Service	01/10/2022	Conference with DGM to prepare for closed session.	0.20	\$140.38	\$28.08
Service	01/13/2022	Telephone conference with AUSA regarding forthcoming subpoena from Gay, deposition, and related matters; communications with client representative regarding same; receive and review subpoena from AUSA; communications with client representatives regarding same.	1.00	\$140.38	\$140.38
Service	01/14/2022	Receive and review subpoena to officer for testimony; forward same to client representatives; prepare motion to quash subpoena; receive and review order denying motion to compel.	1.20	\$140.38	\$168.46
Service	01/18/2022	Finalize and file motion to quash subpoena in criminal matter; communications with court and all involved counsel regarding setting hearing.	1.20	\$140.38	\$168.46
Service	01/19/2022	Receive information from Assistant US Attorney regarding plaintiff's disclosure of confidential video; research regarding same and regarding plaintiff's speech at City Council; prepare first draft of notice of violation of protective order.	4.40	\$140.38	\$617.67
Service	01/20/2022	Prepare two Notice of Service and prepare documents for filing with the Court.	0.50	\$71.44	\$35.72
Service	01/24/2022	Motion to quash	1.00	\$140.38	\$140.38
Service	01/24/2022	Telephone conferences with court chambers to track down information for hearing on motion to suppress; receive and review motion for sanctions.	0.80	\$140.38	\$112.30
Service	01/25/2022	Conference with DGM regarding deposition of plaintiff, notice to stand-by counsel in pending criminal case, and subjects to address; receive and review correspondence from AUSA regarding further subpoenas authorized.	0.50	\$140.38	\$70.19
Service	01/27/2022	Conference call with RIPD representatives regarding newly issued subpoena; conference with DGM regarding same; draft new motion to quash same.	0.40	\$140.38	\$56.15
Service	01/28/2022	review of motion to quash warrant Officer May, telephone call to Lt. Landi, appeared in Fed Court via zoom on motion to quash, city's motion granted officer does not have to travel to Peoria for hearing	0.60	\$140.38	\$84.23

Quantity Subtotal 11.8

Subtotal \$1,622.02

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

Type	Date	Notes	Quantity	Rate	Total
Service	01/04/2022	FOIA requests to agencies responding to occurrence.	1.00	\$140.78	\$140.78
Service	01/05/2022	Receive and review initial FOIA response; communications with RICO Sheriff regarding clarification; receive and review follow-up response with report.	0.80	\$140.78	\$112.62
Service	01/10/2022	Receive and review IDNR report and audio from dispatch.	0.60	\$140.78	\$84.47
Service	01/11/2022	Extended communications with RICO Sheriff regarding FOIA request and tracking down the responsive documents; set up electronic transfer of voluminous IDNR FOIA response.	1.00	\$140.78	\$140.78
Service	01/12/2022	Deal with IT snarls in transferring information to IPMG.	0.80	\$140.78	\$112.62
Service	01/13/2022	Finally manage to electronically transfer documents to claims supervisor.	0.50	\$140.78	\$70.39
Service	01/19/2022	Communications with RIPD regarding police department request for IDNR records.	0.20	\$140.78	\$28.16
Service	01/26/2022	Receive and review appearance of additional counsel for plaintiff; prepare first draft of requests for admission to plaintiff regarding FERC letter.	1.40	\$140.78	\$197.09
Service	01/27/2022	Communications with IDNR regarding reports and regarding insurance information.	0.80	\$140.78	\$112.62
Service	01/28/2022	Check on status of eLibrary filing of request for admission documents; telephone conference with client representative regarding same; correspondence with supervising counsel regarding tactics for authentication and regarding third-party defendant.	0.80	\$140.78	\$112.62
			Quantity Subtotal		7.9
			Subtotal		\$1,112.15

00787-City of Rock Island**Unique Insurance Interpleader action**

Type	Date	Notes	Quantity	Rate	Total
Service	01/07/2022	Receive and review order setting aside default of one co-defendant.	0.20	\$140.78	\$28.16
Service	01/12/2022	Review damages evidence in preparation for requests for admission; communications with client representative regarding same.	0.50	\$140.78	\$70.39
Service	01/13/2022	Receive and review response from client representative regarding damages information; draft requests for admission to each of the many co-defendants regarding same.	2.20	\$140.78	\$309.72
Service	01/14/2022	Prepare notice of service; file same with court; serve requests for admission on all parties.	0.50	\$140.78	\$70.39
Service	01/18/2022	Communications with NWI counsel regarding requests for admission.	0.40	\$140.78	\$56.31
Service	01/19/2022	Receive and review appearance, answer, and affirmative defenses on behalf of Nationwide Insurance.	0.40	\$140.78	\$56.31
Service	01/27/2022	Conference with co-defendant's counsel regarding voluntary withdrawal of of requests for admission (No).	0.20	\$140.78	\$28.16
Quantity Subtotal					4.4
Subtotal					\$619.44

00796-City of Rock Island**Jermaine Jones 1983 action**

Type	Date	Notes	Quantity	Rate	Total
Service	01/10/2022	review file and send letter to Jermaine Jones at new address he has now provided along with copies of 2 letters returned as undeliverable prior tot his providing new address	0.20	\$140.78	\$28.16
Service	01/12/2022	Final revisions to motion to stay and exhibits.	0.60	\$140.78	\$84.47
Quantity Subtotal					0.8
Subtotal					\$112.63

00809-City of Rock Island: Anchor Properties, LLC**Anchor Properties, LLC vs. City of Rock Island 2021CH74**

Type	Date	Notes	Quantity	Rate	Total
Service	01/14/2022	Communications regarding conference call to discuss claim with excess carrier.	0.30	\$140.78	\$42.23
Service	01/18/2022	Review motion to dismiss in preparation for conference call with excess carrier.	0.40	\$140.78	\$56.31
Service	01/20/2022	meeting with city manager and property owner and his client to discuss proposal	0.50	\$140.78	\$70.39
Quantity Subtotal					1.2
Subtotal					\$168.93

00818-Tweet**Willie Reese 1983 action**

Type	Date	Notes	Quantity	Rate	Total
Service	11/22/2021	Receive and review new federal lawsuit; analyze motion possibilities and respond to client representatives; receive and briefly review voluminous video evidence from client representative.	1.00	\$140.78	\$140.78
Service	11/29/2021	Continue to review videos; draft answer and affirmative defenses to plaintiff's complaint; arrange for filing and service of same.	2.80	\$140.78	\$394.18
Service	12/22/2021	Draft motion to stay in light of plaintiff's unavailability.	0.80	\$140.78	\$112.62
Service	01/14/2022	review court's text order and review answer and affirmative defenses	0.50	\$140.78	\$70.39
Service	01/14/2022	Receive and review text order regarding motion to stay; conference with DGM regarding answer and affirmative defenses; finalize same for filing and service.	0.80	\$140.78	\$112.62
Service	01/24/2022	Prepare initial litigation management report; prepare budget.	1.40	\$140.78	\$197.09
Service	01/25/2022	Research regarding disposition of criminal case; work on initial disclosures.	1.00	\$140.78	\$140.78
Service	01/26/2022	Gather information and identify needed information for issuance of medical subpoenas.	0.50	\$140.78	\$70.39

Service	01/31/2022	Finalize and forward litigation management report and budget.	0.30	\$140.78	\$42.23
			Quantity Subtotal		9.1
			Subtotal		\$1,281.08
			Quantity Total		122.45
			Total		\$16,295.74

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
474	02/15/2022	\$16,295.74	\$0.00	\$16,295.74
			Outstanding Balance	\$16,295.74
			Total Amount Outstanding	\$16,295.74

Please make all amounts payable to: David G. Morrison

Please pay within 14 days.