

# Morrison, Marquis, Campbell, Lareau & Weng

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

## INVOICE

Invoice # 490  
Date: 03/01/2022  
Due On: 03/21/2022

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	02/08/2022	Review request and documents to be redacted; communications with client representative regarding same.	0.60	\$140.78	\$84.47
Service	02/10/2022	Communications with client representative regarding response to narrowed request and handling of same.	0.40	\$140.78	\$56.31
Service	02/14/2022	research FOIA code and annotations and Atty. General's guide to FOIA for law enforcement and provided to Jason Foy	0.75	\$140.78	\$105.59
Service	02/14/2022	review foia response and prepare memo for RIPD on FOIA request	1.00	\$140.78	\$140.78
Service	02/14/2022	Legal research regarding exceptions to the Open Meetings Act.	0.80	\$140.78	\$112.62
Service	02/16/2022	Telephone conferences regarding surveillance video from after recent Council meeting.	0.80	\$140.78	\$112.62
Service	02/18/2022	Telephone conferences with client representative and DGM regarding release of documents and application of HR and ethics policies to requesting party.	0.50	\$140.78	\$70.39
Service	02/23/2022	Communications with client representative regarding response and necessary time; draft request for extension of time.	0.50	\$140.78	\$70.39
Service	02/24/2022	Communications with client representative regarding subpoena for information relating to drowning; receive and review same, along with responsive documents.	0.50	\$140.78	\$70.39

Service	02/28/2022	Communications with client representative regarding federal position on exemptions relating to request in connection with related criminal matter.	0.40	\$140.78	\$56.31
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**Quantity Subtotal 6.25**

**Subtotal \$879.87**

## 00002-City of Rock Island

### Chavez wrongful death

Type	Date	Notes	Quantity	Rate	Total
Service	02/03/2022	telephone calls and emails arranging for deposition dates	0.30	\$140.78	\$42.23
Service	02/22/2022	Depo preparation and witness prep	2.25	\$140.78	\$316.76
Service	02/22/2022	deposition preparation and meeting with witnesses	2.25	\$140.78	\$316.76
Service	02/25/2022	Finalize requests for admission and accompanying interrogatories for service.	0.50	\$140.78	\$70.39
Service	02/28/2022	Prepare letter and envelopes for mailing and emails to all attorney's of record. Filed Notice of Service with Court, regarding Chavez vs. City, Request for Admission to Plaintiff and Interrogatories to Plaintiff.	1.00	\$71.44	\$71.44

**Quantity Subtotal 6.3**

**Subtotal \$817.58**

## 00003-City of Rock Island

### Ordinances

Type	Date	Notes	Quantity	Rate	Total
Service	02/22/2022	Review "formal agreement" regarding food truck; conferences with DGM and client representatives regarding validity of same and regarding amendment of ordinance to authorize action.	0.70	\$140.78	\$98.55

**Quantity Subtotal 0.7**

**Subtotal \$98.55**

**00005-City of Rock Island****CED matters**

Type	Date	Notes	Quantity	Rate	Total
Service	02/01/2022	meeting regarding proposed property donation	1.00	\$140.78	\$140.78
Service	02/01/2022	Meeting regarding proposed land donation.	1.00	\$140.78	\$140.78
Service	02/03/2022	Contact owner's counsel regarding motion to vacate.	0.20	\$140.78	\$28.16
Service	02/08/2022	Telephone conference with opposing counsel and court administration to set hearing on motion to vacate.	0.50	\$140.78	\$70.39
Service	02/10/2022	Receive and review notice of hearing on motion to vacate default judgment.	0.20	\$140.78	\$28.16
Service	02/15/2022	telephone with Attorney for County and Miles Brainard regarding counties thoughts on land bank	0.50	\$140.78	\$70.39
Service	02/15/2022	Work on assembling facts to support response to motion to vacate; conference call with client representatives regarding factual basis for same.	1.00	\$140.78	\$140.78
Service	02/17/2022	Finish legal research; conference with client representatives regarding factual basis for resistance and history of inspection and progress with scaffolding; draft resistance to motion to vacate; letter to judge with authority cited in same.	1.20	\$140.78	\$168.94
Service	02/21/2022	Receive and review contract for scaffolding.	0.40	\$140.78	\$56.31
Service	02/22/2022	Communications with counsel regarding upcoming hearing.	0.30	\$140.78	\$42.23
Service	02/23/2022	Prepare for and appear at hearing on Riverview Lofts' motion to vacate judgment on default.	1.80	\$140.78	\$253.40
Expense	02/24/2022	City sale of property at 1419 11th Street. Buyer never closed.	1.00	\$121.00	\$121.00
Service	02/24/2022	Receive and review proposed order regarding motion to vacate default; draft revisions to same.	0.50	\$140.78	\$70.39
Service	02/25/2022	Communications with counsel regarding revisions to proposed order.	0.30	\$140.78	\$42.23
Service	02/28/2022	Receive and review executed and file-stamped order on motion to vacate.	0.20	\$140.78	\$28.16
			<b>Quantity Subtotal</b>		<b>9.1</b>
				<b>Subtotal</b>	<b>\$1,402.10</b>

**00006-City of Rock Island****Payne action for flood damages**

Type	Date	Notes	Quantity	Rate	Total
Service	02/03/2022	Work on trial preparation; review jury instructions.	1.70	\$140.78	\$239.33
Service	02/06/2022	prepare trial binder, review deposition transcript and reviewed pre-trial statements	5.25	\$140.78	\$739.10
Service	02/06/2022	trial preparation including review of deposition, discovery materials from plaintiff weather data, claimed damages documentation and prepare for possible evidentiary issues regarding admissibility	6.25	\$140.78	\$879.88
Service	02/06/2022	Preparation for jury trial.	3.50	\$140.78	\$492.73
Service	02/07/2022	Jury trial.	7.50	\$140.78	\$1,055.85
Service	02/07/2022	jury trial Payne v. City jury returned a zero verdict in favor of city	6.00	\$140.78	\$844.68
Service	02/18/2022	Draft judgment order; file same with clerk for judge's approval and entry.	0.30	\$140.78	\$42.23
Service	02/24/2022	Conference with plaintiff's counsel regarding proposed judgment order; revisions to same; communications with clerk of court and judge regarding same.	0.80	\$140.78	\$112.62
			<b>Quantity Subtotal</b>		<b>31.3</b>
				<b>Subtotal</b>	<b>\$4,406.42</b>

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

Type	Date	Notes	Quantity	Rate	Total
Service	02/15/2022	Status Conference all parties and Court	0.30	\$140.78	\$42.23
Service	02/15/2022	City vs. Rock Island Realty Status Conference	0.50	\$140.78	\$70.39
			<b>Quantity Subtotal</b>		<b>0.8</b>
				<b>Subtotal</b>	<b>\$112.62</b>

**00025-City of Rock Island****Estrada & Joy**

Type	Date	Notes	Quantity	Rate	Total
Service	02/08/2022	Communications with counsel and client representatives regarding deposition arrangements.	0.40	\$140.78	\$56.31
Service	02/09/2022	Communications regarding video arrangements for deposition, change in start time, and other details.	0.60	\$140.78	\$84.47
Service	02/11/2022	Appear for depositions of Augustana representatives Swanson and Rursch.	4.80	\$140.78	\$675.74
			<b>Quantity Subtotal</b>		<b>5.8</b>
				<b>Subtotal</b>	<b>\$816.52</b>

**00021-City of Rock Island****Danielle Herber slip and fall on ped mall**

Type	Date	Notes	Quantity	Rate	Total
Service	02/08/2022	Receive and review voluminous discovery responses from tavern.	0.80	\$140.78	\$112.62
Expense	02/27/2022	Herber vs. Born Entertainment. Order Transcripts.	1.00	\$101.20	\$101.20
			<b>Quantity Subtotal</b>		<b>0.8</b>
				<b>Subtotal</b>	<b>\$213.82</b>

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

Type	Date	Notes	Quantity	Rate	Total
Service	02/04/2022	Extended communications with counsel and court reporter regarding deposition of plaintiff's mother.	0.50	\$140.78	\$70.39
Service	02/15/2022	Communications regarding deposition; prepare notice of same and arrange for filing and service of same.	0.50	\$140.78	\$70.39
Service	02/23/2022	Prepare for and take deposition of plaintiff's mother.	2.40	\$140.78	\$337.87

Quantity Subtotal 3.4

Subtotal \$478.65

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

Type	Date	Notes	Quantity	Rate	Total
Service	02/01/2022	Communications with client representative regarding covid-related contract extension.	0.30	\$140.78	\$42.23
Service	02/02/2022	Conference call DGM and client representative regarding contract extension.	0.40	\$140.78	\$56.31
Service	02/17/2022	drafting extension of West Corridor Implementation performance contract	1.75	\$140.78	\$246.37
Service	02/19/2022	draft proposed agreement for next phase of West Corridor Agreement	2.00	\$140.78	\$281.56
			<b>Quantity Subtotal</b>		<b>4.45</b>
				<b>Subtotal</b>	<b>\$626.47</b>

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

Type	Date	Notes	Quantity	Rate	Total
Service	02/01/2022	Meeting re clerk and ARPA	1.00	\$140.78	\$140.78
Service	02/01/2022	Work on question regarding employee interest in City contract.	2.70	\$140.78	\$380.11
Service	02/08/2022	research issues for liquor commissioner regarding various liquor licensing issues and questions.	1.00	\$140.78	\$140.78
Service	02/17/2022	research issue of surplus property and law on gifts	0.75	\$140.78	\$105.59
Service	02/17/2022	Revisions to memorandum of law regarding gifts and completion of same.	0.40	\$140.78	\$56.31
Service	02/19/2022	research on ethics policy, ethics ordinance and state ethics statute and procedural steps when complaint is filed and prepared draft notices and related documents for hearing under city ordinance	2.00	\$140.78	\$281.56

Service	02/28/2022	Conferences and brief research regarding ratification of scrivener's error in published ordinance.	0.40	\$140.78	\$56.31
			<b>Quantity Subtotal</b>		<b>8.25</b>
			<b>Subtotal</b>		<b>\$1,161.44</b>

## 00583-City of Rock Island

### Demolition Matters

Type	Date	Notes	Quantity	Rate	Total
Service	02/23/2022	Prepare letter to Dispatch/Argus, Preparer Notice of Intent to Demolish. Sent letters to Dispatch and Approved Ad Proofs.	1.00	\$71.44	\$71.44
Service	02/23/2022	Prepare Letter to Dispatch, Prepared Notice of Intent to Demolish. Received and reviewed Proof Ad. Property address 2714 8 1/2 Avenue	1.00	\$71.44	\$71.44
Service	02/28/2022	Prepare 8 letters of Notice of Intent for Demolition property address 2507 6th Avenue. Prepared all Certified cards, copied and scanned all letters. All ready for mailing on 03-03-22.	1.50	\$71.44	\$107.16
Service	02/28/2022	Prepare letter and notice of Intent to demolish for dispatch. Prepare Affidavits for signature. 2507 6th Avenue. Sent to Dispatch/Argus for publication on March 3, 2022.	0.50	\$71.44	\$35.72
Service	02/28/2022	Prepare Certified Letters of Notice of Intent to Demolish. Prepare Certified Cards, copies all letters and supporting documents, copied and scanned all letters. Ready for mailing on 03-03-22. Property Address 2702 5 1/2 Avenue.	1.50	\$71.44	\$107.16
Service	02/28/2022	Prepare Certified Letters of Notice of Intent to Demolish. Prepare Certified Cards, copies all letters and supporting documents, copied and scanned all letters. Ready for mailing on 03-03-22. property address 1206 17th Street	1.50	\$71.44	\$107.16
Service	02/28/2022	Prepare Certified Letters of Notice of Intent to Demolish. Prepare Certified Cards, copies all letters and supporting documents, copied and scanned all letters. Ready for mailing on 03-03-22. Property address 2714 8 1/2 Avenue,	1.25	\$71.44	\$89.30
			<b>Quantity Subtotal</b>		<b>8.25</b>
			<b>Subtotal</b>		<b>\$589.38</b>

**00584-City of Rock Island Attn: Human Resources****Blank**

Type	Date	Notes	Quantity	Rate	Total
Service	02/23/2022	reviewed prior audit letters for finance dept. and began composing 2022 audit letter.	0.50	\$140.78	\$70.39
Service	02/24/2022	GLC meeting	1.50	\$140.78	\$211.17
Service	02/24/2022	Prepare form of release for claims against the City; forward same to client representative for review.	0.50	\$140.78	\$70.39
Service	02/25/2022	finish collecting info, and review of case materials for audit letter and finish composition	1.25	\$140.78	\$175.98
Service	02/25/2022	Detailed revisions to audit letter.	0.80	\$140.78	\$112.62
<b>Quantity Subtotal</b>					<b>4.55</b>
<b>Subtotal</b>					<b>\$640.55</b>

**00703-City of Rock Island****Bankruptcy Proceedings:**

Type	Date	Notes	Quantity	Rate	Total
Service	07/22/2021	John VanDeValde: Review of Summers, Ramos and NOC Bankruptcy filings Discussion of options.	0.60	\$140.78	\$84.47
Service	09/23/2021	John VanDeValde: Email from Marsha, review of documents, review of filing, email to Marsha	0.80	\$140.78	\$112.62
Service	09/28/2021	John VanDeVelde: Email from Marsha, review of Deanda Note, review of AB and Sofa, email to Marsha.	0.20	\$140.78	\$28.16
Service	10/26/2021	JOhn VanDeVelde: Email from David Morrison, review of statute and brief case law review. Email to Dave.	0.60	\$140.78	\$84.47
<b>Quantity Subtotal</b>					<b>2.2</b>
<b>Subtotal</b>					<b>\$309.72</b>



**00704-City of Rock Island****City Matters/Civil Contract**

Type	Date	Notes	Quantity	Rate	Total
Service	02/16/2022	Communications with client representative and DGM regarding information needed for extension of contract.	0.50	\$140.78	\$70.39
			<b>Quantity Subtotal</b>		<b>0.5</b>
			<b>Subtotal</b>		<b>\$70.39</b>

**00709-City of Rock Island****Clay v. Ledbetter**

Type	Date	Notes	Quantity	Rate	Total
Service	02/23/2022	hearing on motion to vacate default order filed by counsel for Best Building/Riverview Lofts LLC	0.75	\$140.78	\$105.59
Service	02/25/2022	Communications with plaintiff's counsel regarding delay in complying with court order.	0.40	\$140.78	\$56.31
			<b>Quantity Subtotal</b>		<b>1.15</b>
			<b>Subtotal</b>		<b>\$161.90</b>

**00713-City of Rock Island****Augustana sewer case**

Type	Date	Notes	Quantity	Rate	Total
Service	02/03/2022	Telephone conference with mediator regarding status of response to last offer; telephone conference with plaintiff's counsel regarding same.	0.40	\$140.78	\$56.31
Service	02/14/2022	Telephone conference with mediator regarding counter-offer from plaintiff.	0.40	\$140.78	\$56.31
Service	02/15/2022	Contact excess carrier's counsel regarding counter; communications with mediator regarding same.	0.50	\$140.78	\$70.39
Service	02/17/2022	Communications with all counsel and mediator regarding dates to resume mediation.	0.50	\$140.78	\$70.39

Service	02/18/2022	Conference with mediator regarding strategy for dealing with third-party defendant; conference call with DGM and mediator regarding possible inclusion of slough remedy in overall settlement negotiations.	0.60	\$140.78	\$84.47
Service	02/22/2022	Conference call with judge and DGM regarding possible settlement options.	0.40	\$140.78	\$56.31
Service	02/23/2022	Conference call with excess counsel regarding settlement tactics; conference call mediator regarding same.	0.50	\$140.78	\$70.39
Service	02/28/2022	Several telephone conferences regarding whether or not to include sewer repairs in settlement negotiations.	0.60	\$140.78	\$84.47
				<b>Quantity Subtotal</b>	<b>3.9</b>
				<b>Subtotal</b>	<b>\$549.04</b>

## 00718-City of Rock Island Foreclosures

### Foreclosures

Type	Date	Notes	Quantity	Rate	Total
Service	02/08/2022	Received and review new Foreclosure Notice. Searched Laredo and Email to Caitlin, Jen, Christine and Nichole.	0.30	\$71.44	\$21.43
Service	02/22/2022	Received and review Notice of Foreclosure 1809 43rd Street. Email to Caitlyn, Jen, Nichol and Christine. Searched Laredo	0.20	\$71.44	\$14.29
				<b>Quantity Subtotal</b>	<b>0.5</b>
				<b>Subtotal</b>	<b>\$35.72</b>

## 00732-City of Rock Island

### Liquor Commission matters

Type	Date	Notes	Quantity	Rate	Total
Service	02/03/2022	Begin research regarding license restrictions, inherent powers of commissioner, and interpretations of same.	1.00	\$140.78	\$140.78
Service	02/04/2022	Wrap up research; draft memorandum regarding ethics rules and conflicts.	1.80	\$140.78	\$253.40
Service	02/08/2022	Conference call with DGM and client representative	0.50	\$140.78	\$70.39

regarding licensure questions.

Service	02/10/2022	Appear for hearing before Illinois Liquor Commission	1.20	\$140.78	\$168.94
			<b>Quantity Subtotal</b>		<b>4.5</b>
			<b>Subtotal</b>		<b>\$633.51</b>

**00787-City of Rock Island**

**Unique Insurance Interpleader action**

Type	Date	Notes	Quantity	Rate	Total
Service	02/08/2022	Receive and review responses to requests for admission from Nationwide and its insured.	0.30	\$140.78	\$42.23
			<b>Quantity Subtotal</b>		<b>0.3</b>
			<b>Subtotal</b>		<b>\$42.23</b>

**00796-City of Rock Island**

**Jermaine Jones 1983 action**

Type	Date	Notes	Quantity	Rate	Total
Service	02/15/2022	Receive and review plaintiff's response to motion regarding discovery; conference with client representative regarding occurrence videos; assemble paper discovery for production.	1.00	\$140.78	\$140.78
Service	02/21/2022	Revisions to reply to discovery motion.	0.30	\$140.78	\$42.23
Service	02/24/2022	Receive and review text order regarding discovery and extension of fact discovery; receive and review exhibits to produce in discovery.	0.40	\$140.78	\$56.31
Service	02/25/2022	Finalize initial disclosures for transmission.	0.50	\$140.78	\$70.39
			<b>Quantity Subtotal</b>		<b>2.2</b>
			<b>Subtotal</b>		<b>\$309.71</b>
			<b>Quantity Total</b>		<b>105.2</b>
			<b>Total</b>		<b>\$14,356.19</b>
			<b>Payment (03/09/2022)</b>		<b>-\$281.56</b>

**Balance Owing      \$14,074.63**

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
490	03/21/2022	\$14,356.19	\$281.56	\$14,074.63
<b>Outstanding Balance</b>				<b>\$14,074.63</b>
<b>Total Amount Outstanding</b>				<b>\$14,074.63</b>

### Dave Illinois IOLTA Trust Account

Date	Type	Notes	Matter	Receipts	Payments	Balance
02/10/2022		Payment for trust request: #476	00732-City of Rock Island		\$281.56	\$281.56
03/09/2022		Payment for invoice #490	00732-City of Rock Island	\$281.56		\$0.00
<b>Dave Illinois IOLTA Trust Account Balance</b>						<b>\$0.00</b>

Please make all amounts payable to: David G. Morrison

Please pay within 20 days.