



INVOICE

Invoice # 579
Date: 09/30/2022
Due On: 10/14/2022

Morrison, Lareau & Weng

1600 - 5th Avenue
Rock Island, IL 61201
United States

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	09/01/2022	Revisions to letter to Neppi; communications with client representative regarding same.	0.50	\$140.78	\$70.39
Service	09/06/2022	Communications with counsel regarding copies of text messages that purport to make testimony relevant	0.50	\$140.78	\$70.39
Service	09/07/2022	Appear in Circuit Court for merits hearing on no-contact cases; resolve same without need for client representative to appear.	1.50	\$140.78	\$211.17
Service	09/19/2022	Communications with ASA and DGM regarding upcoming hearing concerning felon's FOID application.	0.40	\$140.78	\$56.31
Service	09/27/2022	Appear in Rock Island County Circuit Court for hearing on pro se motion concerning reinstatement of FOID.	1.00	\$140.78	\$140.78
Quantity Subtotal					3.9
Subtotal					\$549.04

00002-City of Rock Island

Chavez wrongful death

Type	Date	Notes	Quantity	Rate	Total
Service	09/01/2022	Drafted Notice of Hearing and Certificate of service; filed with Rock Island County Clerk w/Motion; saved	1.25	\$140.78	\$175.98

same to dropbox.

Service	09/02/2022	Prepare draft of letter regarding settlement within policy limits and potential bad-faith claim.	1.20	\$140.78	\$168.94
Service	09/06/2022	Work on summary judgment brief	4.00	\$140.78	\$563.12
Service	09/07/2022	Legal research and drafting on motion for summary judgment	2.80	\$140.78	\$394.18
Service	09/08/2022	continue work on MSJ brief	2.00	\$140.78	\$281.56
Service	09/09/2022	Conference with DGM regarding revisions to letter to excess carrier	0.20	\$140.78	\$28.16
Service	09/12/2022	Communications with plaintiff's counsel regarding summary judgment briefing schedule; work on brief for same.	2.20	\$140.78	\$309.72
Service	09/13/2022	Conference with DGM regarding response to plaintiff's requests and regarding establishing facts regarding excess carrier's duty to settle within policy limits.	0.40	\$140.78	\$56.31
Service	09/14/2022	Communications with third-party counsel regarding CMC; conference call with excess carrier's counsel regarding settlement prospects and MSJ; communications with plaintiff's counsel regarding CMC.	1.20	\$140.78	\$168.94
Service	09/14/2022	Mark Wolfe Conf call co-counsel	0.50	\$140.78	\$70.39
Service	09/15/2022	Appear in Rock Island County Circuit Court for case management conference and plaintiff's motion to set summary judgment deadlines.	0.50	\$140.78	\$70.39
Service	09/16/2022	Continue work on MSJ brief; conference call with DGM and excess carrier counsel	2.50	\$140.78	\$351.95
Service	09/21/2022	Receive and review draft release for third-party defendant; propose revisions to same.	0.80	\$140.78	\$112.62
Service	09/26/2022	Conference regarding facts and effect of federal regulations on admissibility; further conference regarding settlement with third party defendant.	0.40	\$140.78	\$56.31
Service	09/27/2022	research and go through 200 plus pages documents assembling facts MSJ Chavez	6.50	\$140.78	\$915.07
Expense	09/28/2022	Paoletti & Associates: Chavez vs. City of Rock Island. Transcripts Randy THompson and Brint Burrill.	1.00	\$796.25	\$796.25
Service	09/28/2022	review lease, amendments and FERC library documents preparing for MSJ	4.25	\$140.78	\$598.32
			Quantity Subtotal		30.7
			Subtotal		\$5,118.21

00003-City of Rock Island

Ordinances

Type	Date	Notes	Quantity	Rate	Total
Service	09/27/2022	Review proposed changes to sewer use ordinance required by USEPA and recommendations of environmental counsel; communications with client representative regarding same.	1.20	\$140.78	\$168.94
			Quantity Subtotal		1.2
			Subtotal		\$168.94

00005-City of Rock Island

CED matters

Type	Date	Notes	Quantity	Rate	Total
Expense	09/06/2022	Recorder of Deeds. Record Release of Demolition Lien 806 7th Avenue, Rock Island.	1.00	\$65.00	\$65.00
Service	09/12/2022	Communications with client representatives and from putative developer regarding changes to proposed development plans.	0.50	\$140.78	\$70.39
Service	09/13/2022	Review proposed changes to draft settlement agreement; communications with client representative regarding same.	0.50	\$140.78	\$70.39
Service	09/13/2022	Review purchase agreement Ridgewood Road property and make suggested edits	0.50	\$140.78	\$70.39
Service	09/19/2022	Meeting with CED Director and City Manager, regarding SSA.	1.25	\$140.78	\$175.98
Service	09/19/2022	Communications regarding meeting to discuss SSA notice; attend meeting with City Manager and staff to discuss same and several other pending CED matters.	1.80	\$140.78	\$253.40
Service	09/19/2022	SSA meeting	1.00	\$140.78	\$140.78
Service	09/20/2022	Review and comment on memorandum regarding donation of land.	0.20	\$140.78	\$28.16
Expense	09/22/2022	Lindquist Title: Title Searches on property East of 4608 78th Avenue and Industrial Park. DJ Mahar purchase which was cancelled.	1.00	\$148.50	\$148.50

Service	09/23/2022	Review draft letter regarding SSA; suggest revisions to same.	0.50	\$140.78	\$70.39
Service	09/28/2022	Review proposed special use ordinance; legal research regarding same; comments regarding change to proposed language	0.80	\$140.78	\$112.62
			Quantity Subtotal		7.05
			Subtotal		\$1,206.00

00018-City of Rock Island

Rock Island Realty

Type	Date	Notes	Quantity	Rate	Total
Service	09/08/2022	telephone status conference call with Judge Hawley, city representatives and opposing counsel on status of demolition	0.50	\$140.78	\$70.39
Service	09/08/2022	status hearing on RI Realty case and discussion after status hearing	0.60	\$140.78	\$84.47
			Quantity Subtotal		1.1
			Subtotal		\$154.86

00025-City of Rock Island

Estrada & Joy

Type	Date	Notes	Quantity	Rate	Total
Service	09/14/2022	Communications with plaintiff's counsel regarding CMC and expert deadlines; confer with DGM regarding same; communications with co-defendant's counsel regarding same.	0.50	\$140.78	\$70.39
Service	09/15/2022	Appear in Rock Island County Circuit Court for case management conference and expert deadlines	1.00	\$140.78	\$140.78
Service	09/15/2022	Estrada and Joy vs. City of Rock Island, Chavez et al	1.00	\$140.78	\$140.78
Service	09/19/2022	Communications with counsel and deponent regarding former employee deposition.	0.40	\$140.78	\$56.31
Service	09/21/2022	Communications with deponent and counsel regarding deposition dates.	0.60	\$140.78	\$84.47

Service	09/26/2022	Communications with deponent and counsel regarding dates for deposition.	0.50	\$140.78	\$70.39
Service	09/28/2022	Communications with counsel regarding deposition of Larry Cook; communications with Cook regarding same.	0.40	\$140.78	\$56.31
			Quantity Subtotal		4.4
			Subtotal		\$619.43

00021-City of Rock Island

Danielle Herber slip and fall on ped mall

Type	Date	Notes	Quantity	Rate	Total
Service	09/01/2022	Communications with all counsel regarding need for HIPAA release from plaintiff.	0.60	\$140.78	\$84.47
Service	09/09/2022	Receive and review executed HIPAA release	0.20	\$140.78	\$28.16
Service	09/15/2022	Appear in Rock Island County Circuit Court for case management conference.	1.00	\$140.78	\$140.78
Expense	09/23/2022	Iowa-Illinois Reporting. Deposition Transcripts of Danielle Denson regarding Herber vs, Born Entertainment 2020L31	1.00	\$241.90	\$241.90
			Quantity Subtotal		1.8
			Subtotal		\$495.31

00026-City of Rock Island

General real estate matters

Type	Date	Notes	Quantity	Rate	Total
Service	09/29/2022	telephone calls with Army Corp of Engineers and their attorney regarding easement agreement for sewer line for RI Arsenal, review proposed warranty deed of easement, title policy and related documents	1.20	\$140.78	\$168.94
			Quantity Subtotal		1.2
			Subtotal		\$168.94

00696-City of Rock Island**Public Works matters**

Type	Date	Notes	Quantity	Rate	Total
Service	09/28/2022	Review draft opinion letter to EPA regarding authority to enforce ordinance; research cited CFR and statute sections; revisions to letter; transmit same to client representative	1.50	\$140.78	\$211.17
			Quantity Subtotal		1.5
			Subtotal		\$211.17

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

Type	Date	Notes	Quantity	Rate	Total
Service	09/07/2022	Department Head Meeting	1.25	\$140.78	\$175.98
Service	09/21/2022	Meeting with mayor regarding Liquor ordinance and state statute matter	0.50	\$140.78	\$70.39
Service	09/28/2022	RI Human Rights Commission meeting with city manager	1.00	\$140.78	\$140.78
			Quantity Subtotal		2.75
			Subtotal		\$387.15

00583-City of Rock Island**Demolition Matters**

Type	Date	Notes	Quantity	Rate	Total
Service	09/08/2022	Prepare Demolition Lien 2714 8 1/2 Avenue.	0.40	\$71.44	\$28.58
Service	09/08/2022	Prepare Demolition Lien 2507 6th Avenue. Dropped off at City for Signatures.	0.40	\$71.44	\$28.58
Service	09/08/2022	Prepare Demolition Lien 1206 17th Street. Dropped off at City for Signatures.	0.40	\$71.44	\$28.58

Service	09/08/2022	Prepare Demolition Lien 2702 5 1/2 Avenue. Dropped off at City for Signatures.	0.40	\$71.44	\$28.58
Expense	09/22/2022	Recorder of Deeds: Record Notice of Interest 2702 5 1/2 Avenue, Rock Island, IL 61201	1.00	\$65.00	\$65.00
Expense	09/22/2022	Recorder of Deeds: Record Notice of Interest 1206 17th Street, Rock Island, IL 61201	1.00	\$65.00	\$65.00
Expense	09/22/2022	Recorder of Deeds: Record Notice of Interest 2714 8 1/2 Avenue, Rock Island, IL 61201	1.00	\$65.00	\$65.00
Expense	09/22/2022	Recorder of Deeds: Record Notice of Interest 2507 6th Avenue, Rock Island, IL 61201	1.00	\$65.00	\$65.00
			Quantity Subtotal		1.6
			Subtotal		\$374.32

00703-City of Rock Island

Bankruptcy Proceedings:

Type	Date	Notes	Quantity	Rate	Total
Service	07/01/2022	Memorandum of Judgment filed Requet Bankruptcy	0.10	\$140.78	\$14.08
Service	07/21/2022	Download and save all Request Bankruptcy Information.	0.30	\$140.78	\$42.23
Service	08/09/2022	Email and telephone correspondence with other creditors Attorney, regarding motion.	0.50	\$140.78	\$70.39
Service	08/11/2022	Review file regarding benefit of objection and Debtors request to disburse funds.	0.40	\$140.78	\$56.31
Service	08/15/2022	Review debtors financials and asset information.	0.30	\$140.78	\$42.23
Service	08/15/2022	Research Case law and Correspondence with other creditors.	0.90	\$140.78	\$126.70
Service	08/16/2022	Correspondence with Vandavelde regarding Requet Bankruptcy.	0.20	\$140.78	\$28.16
Service	08/17/2022	Review case files in preparation for 341 Hearing.	1.30	\$140.78	\$183.01
Service	08/25/2022	341 Hearing Requet	0.50	\$140.78	\$70.39
Service	09/06/2022	Requet Bankruptcy Hearing	0.70	\$140.78	\$98.55
Service	09/06/2022	Telephone conference with Vandavelde regarding Requet Bankruptcy. Information	0.50	\$140.78	\$70.39
Service	09/29/2022	reviewed motion for sale of real estate from debtor in	0.40	\$140.78	\$56.31

the P. Scott bankruptcy and proposed sale agreement attached to the motion

Quantity Subtotal 6.1

Subtotal \$858.75

00713-City of Rock Island

Augustana sewer case

Type	Date	Notes	Quantity	Rate	Total
Service	09/09/2022	Communications all counsel regarding final order of dismissal	0.30	\$140.78	\$42.23
Service	09/12/2022	Communications with all counsel regarding final dismissal order; receive and review same	0.50	\$140.78	\$70.39
			Quantity Subtotal		0.8
				Subtotal	\$112.62

00718-City of Rock Island Foreclosures

Foreclosures

Type	Date	Notes	Quantity	Rate	Total
Service	09/13/2022	Searched Laredo for 84 current foreclosures. Printed all Sheriff's Deeds.	1.50	\$71.44	\$107.16
Expense	09/13/2022	Pulled 40 pages of Foreclosure documents for City Foreclosures.	1.00	\$10.00	\$10.00
Service	09/26/2022	Received and reviewed 5 foreclosure notice. Calendared 2 notice and searched 3 notices in Laredo. Sent emails to City staff. Property addresses 2002 40th Street, 1155 39th Street, 1512 42nd Street.	1.25	\$71.44	\$89.30
			Quantity Subtotal		2.75
				Subtotal	\$206.46

00707-City of Rock Island

Finance matters

Type	Date	Notes	Quantity	Rate	Total
Service	09/28/2022	City /Mid American status hearings x 2 via telephone Illinois Commerce Commission v. Mid American Energy	0.50	\$140.78	\$70.39
			Quantity Subtotal		0.5
			Subtotal		\$70.39

00723-City of Rock Island

Library matters

Type	Date	Notes	Quantity	Rate	Total
Service	09/28/2022	Review offer to purchase and client concerns regarding same; communications with client representatives regarding survey and other pre-closing matters; communications with seller's counsel regarding all of the above	0.80	\$140.78	\$112.62
			Quantity Subtotal		0.8
			Subtotal		\$112.62

00732-City of Rock Island

Liquor Commission matters

Type	Date	Notes	Quantity	Rate	Total
Service	09/16/2022	Legal research regarding licensure for changed use premises	0.30	\$140.78	\$42.23
			Quantity Subtotal		0.3
			Subtotal		\$42.23

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

Type	Date	Notes	Quantity	Rate	Total
Service	09/08/2022	draft proposed intergovernmental agreement regarding radio systems	2.15	\$140.38	\$301.82
Service	09/20/2022	Review new appellate decision regarding odor of cannabis and probable cause; forward same to client representative for review.	0.40	\$140.38	\$56.15
			Quantity Subtotal		2.55
				Subtotal	\$357.97

00777-City of Rock Island**Human Rights Commission matters**

Type	Date	Notes	Quantity	Rate	Total
Service	08/05/2022	Receive and review proposed revisions to draft ordinance.	0.40	\$140.78	\$56.31
Service	09/02/2022	Respond to client request regarding redline version of proposed ordinance	0.40	\$140.78	\$56.31
Service	09/09/2022	Conference with DGM regarding scope of jurisdiction conferred by proposed ordinance; search for study sessions held with Council	0.40	\$140.78	\$56.31
			Quantity Subtotal		1.2
				Subtotal	\$168.93

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

Type	Date	Notes	Quantity	Rate	Total
Service	09/09/2022	Detailed review of draft discovery responses; communications with client representative regarding same.	1.20	\$140.78	\$168.94

Service	09/09/2022	Transferred material to pdf, saved in dropbox for review; Final review of answers and responses; changes and additions made; emailed signature pages to Lisa Perry with all answers and response documents attached.	2.50	\$140.78	\$351.95
Service	09/12/2022	Receive and review signature pages from client representative after corrections to errata	0.40	\$140.78	\$56.31
Service	09/13/2022	Changes to responses and answers; finalized discovery material for production; receive and review voluntary dismissal of Newt Marine.	3.70	\$140.78	\$520.89
Service	09/14/2022	Compiled all discovery in transfer link for review and approva; had issues with Adobe and multiple forms that had signatures; alternative resolution found;	3.00	\$140.78	\$422.34
Service	09/19/2022	Filed Notice of serving discovery responses; emailed copy to all attorneys of record; shared link via email to all attorneys containing discovery material.	1.50	\$140.78	\$211.17
Service	09/20/2022	Began drafting answers to Interrogatories and Responses for Plaintiff (non-select).	5.50	\$140.78	\$774.29
Service	09/20/2022	Continued work for discovery responses to Interrogatories by Plaintiff (non-select); served on City - August 21, 2021.	2.50	\$140.78	\$351.95
Service	09/21/2022	Continued drafting answers to Interrogatories and Responses to Plaintiffs discovery requests (non-select).	5.50	\$140.78	\$774.29
Service	09/27/2022	More work on Responses to Interrogatories.	5.80	\$140.78	\$816.52
Service	09/27/2022	Communications with counsel regarding desired deponents and dates for same.	0.40	\$140.78	\$56.31
Service	09/28/2022	Communications with counsel regarding discovery matters	0.60	\$140.78	\$84.47
Service	09/28/2022	Revisions to draft interrogatories; review factual bases for same.	2.50	\$140.78	\$351.95
Service	09/29/2022	Continued work on production of material in connection with the responses to RTP for Ravelingeen case.	4.50	\$140.78	\$633.51
			Quantity Subtotal		39.6
			Subtotal		\$5,574.89

00787-City of Rock Island

Unique Insurance Interpleader action

Type	Date	Notes	Quantity	Rate	Total
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Service	09/13/2022	Communications with counsel regarding City Council's approval of settlement.	0.30	\$140.78	\$42.23
Service	09/16/2022	Receive and review order approving settlement.	0.20	\$140.78	\$28.16
			Quantity Subtotal		0.5
				Subtotal	\$70.39

00796-City of Rock Island

Jermaine Jones 1983 action

Type	Date	Notes	Quantity	Rate	Total
Service	07/18/2022	Print documents, envelope/addressed copies of documents for Cert. Srvc Jermaine case; filed and mailed same.	0.50	\$140.78	\$70.39
Service	09/16/2022	Receive and review notification of officer's termination; brief conference regarding possible impact on litigation.	0.40	\$140.78	\$56.31
			Quantity Subtotal		0.9
				Subtotal	\$126.70

00809-City of Rock Island: Anchor Properties, LLC

Anchor Properties, LLC vs. City of Rock Island 2021CH74

Type	Date	Notes	Quantity	Rate	Total
Service	09/01/2022	Prepare for and appear in Circuit Court for hearing on motion to dismiss.	2.00	\$140.78	\$281.56
			Quantity Subtotal		2.0
				Subtotal	\$281.56
			Quantity Total		115.2
				Total	\$17,436.88

Please make all amounts payable to: David G. Morrison

Please pay within 14 days.