



BEGGS & LANE RLLP
ATTORNEYS and COUNSELLORS at LAW
SINCE 1883

April 25, 2017

IN ACCOUNT WITH

P. O. Box 12950
Pensacola, FL 32591-2950

City of Pensacola
The Honorable Ashton Hayward
Mayor of Pensacola
P. O. Box 12910
Pensacola, FL 32521-0044

Telephone (850) 432-2451
Fax (850) 469-3331

Matter ID: 2532-71207
Statement# 83069
Stmnt as of April 25, 2017

Re: Bayview Cross Litigation - Kondrat'yev v. The City of Pensacola -

To services as follows:

<u>Date</u>	<u>Attorney</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
1/30/2017	JKM	Prepare documents for production. Bates number documents for production.	3.50	385.00
1/30/2017	JKM	Prepare draft responses to Suhor's request for production.	1.50	165.00
1/31/2017	JKM	Meet with Brian Cooper re: interrogatory responses.	0.50	55.00
1/31/2017	JKM	Revise interrogatory responses for Brian Cooper.	0.30	33.00
1/31/2017	JKM	Revise interrogatory responses for Ashton Hayward based on additional information from Parks & Recreation.	0.30	33.00
1/31/2017	JKM	Meet with Brian Cooper; revise responses to discovery.	0.70	77.00
1/31/2017	JKM	Telephone call with Vicky Lowery regarding 5 gray tubs of Park & Recreation documents; revise discovery responses.	0.30	33.00
1/31/2017	JKM	Finalize responses to discovery for service; serve discovery responses on opposing counsel.	1.00	110.00

RP# 796177
V# 002112
510005.9335.119082
Bayview Cross - Fees
Bayview Cross - Exp

11,182.50
50.73

Beggs & Lane, RLLP

Re: 2532-71207

Page: 2

1/31/2017	JKM	Public records request to the City for any and all documents sent via mail or email from any entity related to opposing of the cross at Bayview Park.	0.20	22.00
1/31/2017	TLD	Office conference with Brian Cooper regarding interrogatories.	0.50	147.50
1/31/2017	TLD	Telephone conference with Robert Parker, former Jaycees member.	0.30	88.50
2/3/2017	TLD	Office conference with J. Nixon Daniel, III regarding discovery.	0.20	59.00
2/3/2017	TLD	Letter to Brian Cooper regarding discovery issue.	0.10	29.50
2/10/2017	TLD	Revise memorandum in support of motion for summary judgment; revise Brian Cooper's affidavit.	2.80	826.00
2/10/2017	TLD	Review City ordinances regarding special events and telephone conference with Brian Cooper regarding same.	0.50	147.50
2/13/2017	JKM	Email with Dean DeBolt and UWF General Counsel re: affidavit discussing the preservation of archived PNJ articles on microfilm.	0.30	33.00
2/14/2017	JKM	Conference with Terrie Didier re: documents and discovery needed for Motion for Summary Judgment.	0.20	22.00
2/14/2017	JKM	Telephone call with Brian Cooper re: affidavit.	0.10	11.00
2/14/2017	JND	Revise final draft of motion for summary judgement and affidavit of Brian Cooper.	0.70	206.50
2/14/2017	TLD	Revise motion for summary judgment.	0.20	59.00
2/15/2017	JKM	Meeting with Dean DeBolt, Professor at UWF Library re: research and affidavit.	2.50	275.00
2/16/2017	JKM	Meet with Brian Cooper re: affidavit.	0.10	11.00

Beggs & Lane, RLLP

Re: 2532-71207

Page: 3

2/20/2017	TLD	Review Bayview Park Master Plan.	0.20	59.00
2/27/2017	TLD	Review file to answer discovery question.	0.40	118.00
2/28/2017	TLD	Telephone conference with Vickie Lawley regarding discovery issues and e-mails with J. Nixon Daniel, III regarding same.	0.60	177.00
3/2/2017	JKM	Receipt and review of additional documents; Bates number for production.	2.70	297.00
3/2/2017	TLD	Draft response to discovery.	3.10	914.50
3/3/2017	JKM	Prepare for and attend meeting with Vicky Lawley re: discovery responses.	2.00	220.00
3/3/2017	JND	Review discovery issues; email from plaintiff's counsel re discovery issues.	0.50	147.50
3/3/2017	TLD	Telephone conferences with Brian Cooper, Vicki Lawley and Bill Kimball regarding discovery; e-mails to J. Nixon Daniel, III and Jodi K. McArthur regarding same; draft response to plaintiffs' discovery inquiry.	2.10	619.50
3/8/2017	TLD	Review documents produced by City.	0.50	147.50
3/9/2017	JND	Meeting with Brian Cooper and Terrie Didier re discovery issues; review responses to request for admissions; email to plaintiff's counsel re discovery.	1.40	413.00
3/9/2017	TLD	Review documents provided by City.	3.00	885.00
3/9/2017	TLD	Office conference with J. Nixon Daniel, III and City representatives regarding discovery issues.	1.00	295.00
3/12/2017	JND	Review and revise responses to requests to admit; email to Mayor Hayward, Mr. Cooper and Ms. Bowling.	0.60	177.00
3/14/2017	JKM	Telephone call with Bryan Cooper re: park rentals.	0.10	11.00

Beggs & Lane, RLLP

Re: 2532-71207

Page: 4

3/14/2017	TLD	Telephone conference with Vicki Lawley regarding discovery; research discovery issue and e-mail to J. Nixon Daniel, III regarding same.	1.00	295.00
3/22/2017	JKM	Receipt and review of 3rd set of supplemental documents from Parks & Recreation (1.68 GB data); Bates number responsive documents for production; conference with Terrie Didier re: amount of time to process data for production.	5.30	583.00
3/22/2017	TLD	Telephone conference with Vicki Lawley regarding discovery; e-mail to J. Nixon Daniel, III regarding same; draft clarification to response to interrogatories.	0.60	177.00
3/23/2017	JKM	Telephone call with Brian Cooper, Parks & Recreation re: interrogatory clarification.	0.10	11.00
3/23/2017	JKM	Finalize Brian Cooper's response to interrogatories; draft Ashton Hayward's response to interrogatories.	0.50	55.00
3/23/2017	JKM	Review documents from the City for supplemental responses to plaintiff; draft supplemental response based on additional information.	4.70	517.00
3/23/2017	JKM	Meet with Brian Cooper for verification of amended interrogatory response (.2); finalize and serve amended and supplemental discovery responses (.3); upload responsive documents to ShareFile for service (.7).	1.20	132.00
3/23/2017	TLD	Review supplemental responses to discovery.	0.30	88.50
3/23/2017	TLD	E-mail to opposing counsel regarding supplemental discovery.	0.20	59.00
3/27/2017	TLD	Review documents to respond to public request.	0.60	177.00
3/31/2017	TLD	Final review of motion and exhibits.	1.50	442.50
4/7/2017	TLD	Revise Brian Cooper's affidavit.	0.40	118.00

Beggs & Lane, RLLP

Re: 2532-71207

Page: 5

4/10/2017	TLD	Revise Brian Cooper's affidavit.	0.20	59.00
4/11/2017	JKM	Conference with Brian Cooper re: affidavit in support of Motion for Summary Judgment.	0.20	22.00
4/11/2017	JKM	Conference with S. Southerland and Terrie Didier re: Jaycees Manual and updated affidavit.	0.20	22.00
4/11/2017	JKM	Prepare revised exhibits to the City's Motion for Summary Judgment.	0.70	77.00
4/17/2017	JKM	Prepare exhibits in support of City's motion for Summary Judgment.	3.00	330.00
4/17/2017	TLD	Revise motion to increase word limit.	0.10	29.50
4/17/2017	TLD	Draft request for hearing.	0.20	59.00
4/18/2017	TLD	Final review of motion/memorandum for summary judgment with exhibits.	0.30	88.50
4/24/2017	JND	Review motion for summary judgement and memorandum of plaintiffs.	1.20	354.00
4/24/2017	TLD	Review plaintiffs' motion for summary judgment.	0.60	177.00
		Total Hours	<u>58.10</u>	<u>11,182.50</u>

Rate Summary

Jodi K. McArthur	32.20	hours at	110.00/hr	\$	3,542.00
Terrie L. Didier	21.50	hours at	295.00/hr	\$	6,342.50
J. Nixon Daniel, III	4.40	hours at	295.00/hr	\$	1,298.00
	<u>58.10</u>				
Total hours:	58.10		Total Fees	\$	11,182.50

Disbursements

Copy cost \$ 32.00

Beggs & Lane, RLLP

Re: 2532-71207

Page: 6

Reimbursement. \$ 18.73

Sub-total Expenses: \$ 50.73

Total Now Due: \$ 11,233.23