

CERMELE & MATTHEWS, S.C.

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JENNIFER R. LAND
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RECEIVED

JUN 19 2014

OFFICE OF
CITY ATTORNEY

June 18, 2014

Mr. Ronald Leonhart
Attn: Marian Hartner
Milwaukee City Clerk
City Hall, Room 205
200 East Wells Street
Milwaukee, WI 53202

CITY CLERK

JIM
OWCZARSKI
CITY CLERK

Re: *Citizen Complaint of Nikki Harris Brown
Against MPD Officers Dean Lidwin and Timothy Meinecke
Submitted Pursuant to §895.35(1), Stats.*

CITY OF MILWAUKEE
2014 JUN 19 PM 3:40
CITY CLERK'S OFFICE

Dear Ms. Hartner:

Milwaukee police officers Dean Lidwin and Timothy Meinecke retained this firm to defend them with respect to a citizen complaint filed with the Milwaukee Fire and Police Commission. Consistent with the City Attorney's policy and ethical obligations, the City Attorney was unable to represent these officers in this matter.

As the allegations against Officers Lidwin and Meinecke arose out of the performance of their official duties, this matter is being submitted under §895.35(1), Stats.

As is evident from the attachments, the Circuit Court "voided" the decision of the Fire and Police Commission, and the City Attorney has ensured that both officers were made whole in terms of lost time and benefits stemming from what the Circuit Court determined to be the unconstitutional decision of the Fire and Police Commission.

Attached is a detailed account of the fees (at \$110.00 per hour) and expenses necessarily expended in the successful defense of Officers Lidwin and Meinecke.

Consistent with Article 58 of the Labor Agreement between the City and the Milwaukee Police Association, this claim is to be placed on the Common Council's agenda within 180 days of its receipt by your office.

REPRESENTING LAW ENFORCEMENT UNIONS AND INDIVIDUAL OFFICERS
THROUGHOUT THE STATE OF WISCONSIN.

Offices also located in Arbor Vitae, WI - Vilas County (715) 356-5164



Given that time frame, Assistant City Attorney Jan Smokowicz is being provided with a courtesy copy of this letter and its enclosures.

Sincerely,

CERMELE & MATTHEWS, S.C.

Jon Cermele

JC/cal

Enclosure

pc: Atty. Jan Smokowicz (w/encl. via US Mail)

CERMELE & MATTHEWS, S.C.

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BRENDAN P. MATTHEWS

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April 10, 2014

JENNIFER R. LAND

jennifer@cermelelaw.com

Mr. Ronald Leonhardt
Milwaukee City Clerk
City Hall, Room 205
200 East Wells Street
Milwaukee, WI 53202

RE: Citizen Complaint of Ms. Nikki Harris-Brown
Against PO's Dean Lidwin and Timothy Meinecke
FPC No: 2010-0105
Date of Incident: April 18, 2010
*C&M Reference No.: 2014-1

CITY OF MILWAUKEE
CITY CLERK'S OFFICE
2014 JUN 18 PM 3:45

Professional Services (Attorney's Fees)

	<u>Hours</u>	<u>Amount</u>
5/24/2011 Lengthy telephone call from PO Lidwin regarding new citizen complaint; e-mail to FPC Hearing Examiner; telephone call to same.	0.60	66.00
6/16/2011 Review all documentary evidence presented by the FPC; lengthy office conference with clients; meeting with potential MPD witnesses.	1.70	187.00
6/22/2011 Finish review of file; memo to file; conference call with Hearing Examiner and Cermele; intra-office conference with Cermele regarding claim; review FPC rules; several telephone calls to and from Hearing Examiner's office regarding rescheduling hearing and case procedure; review FPC intake guidelines and rules; intra-office conference with Cermele regarding same.	1.40	154.00
7/21/2011 E-mail from Hearing Examiner; direction to Matthews.	0.10	11.00

Mr. Ronald Leonhardt

	<u>Hours</u>	<u>Amount</u>
7/25/2011 Telephone call from Hearing Examiner regarding pretrial.	0.20	22.00
7/26/2011 Telephone call from Hearing Examiner rescheduling pretrial (at citizen's request).	0.10	11.00
8/22/2011 Receive and review message from Hearing Examiner confirming pre-trial; telephone call to FPC (requesting copy of amended Investigative Summary); intra-office conference with Matthews; direction to same.	0.30	33.00
Intra-office conference with Cermele regarding upcoming pre-trial and case theory; telephone call from Tobin.	0.30	33.00
8/25/2011 Pre-trial preparation; telephone call from Hearing Examiner regarding same; telephone call to Cermele regarding same; travel; attend pre-trial; return travel.	2.10	231.00
8/30/2011 Receive and review correspondence from FPC; receive and review correspondence from Hearing Examiner.	0.20	22.00
9/27/2011 Telephone call from FPC; receive and review correspondence from same with Witness and Exhibit List.	0.20	22.00
9/30/2011 Review file for Witness and Exhibit List; telephone call to Dept. of Corrections regarding training of agents for photo line-ups.	0.60	66.00
10/10/2011 Draft Witness and Exhibit List; intra-office conference with Cermele regarding same.	0.40	44.00
10/13/2011 Intra-office conference with Cermele regarding case; telephone call to Hearing Examiner; review of FPC Citizen Complaint trials with Cermele.	0.50	55.00
10/14/2011 Meetings with MPD Witnesses regarding officer's actions; several telephone calls to Department of Corrections; telephone call to clients regarding incident and questions; memo to file; determine additional witnesses and exhibits to file; meeting with MPD Detective regarding photo arrays.	1.20	132.00

	<u>Hours</u>	<u>Amount</u>
10/17/2011 Telephone call to Probation/Parole Supervisor.	0.10	11.00
10/18/2011 Trial preparation; intra-office conference with Cermele regarding witnesses, etc.; review "investigation" related SOP's; memo to file; texts to and from PO Meinecke.	1.10	121.00
10/19/2011 Intra-office conference with Cermele regarding new pre-trial; telephone call to Hearing Examiner regarding same; meeting with Crivello regarding positions/responsibilities of Sgts./Lts.; lengthy telephone call from Hearing Examiner regarding legal issues with case; telephone conference with complainant and Mr. Hankins; telephone call to PO Meinecke; meeting with MPD Personnel regarding CAD abbreviations and on-scene protocol.	1.10	121.00
10/21/2011 Office conference with MPD Detective regarding testifying, witness preparation, CAD details and records information; continue trial preparation.	1.20	132.00
10/22/2011 Trial preparation.	1.50	165.00
10/24/2011 Telephone call to PO Meinecke regarding office conference; reschedule same; texts to and from PO Lidwin regarding same; telephone call to MPD Accident Reconstructionist regarding his investigation; memo to file; telephone call to and from Hearing Examiner regarding hearing.	0.90	99.00
10/25/2011 Work on drafting motion(s); telephone call to and from FPC regarding subpoenas; intra-office conference with Cermele regarding motions; Westlaw legal research on Motions in Limine for police reports; office conference with clients; memo to file; telephone call to FPC; adjournment request to Hearing Examiner Carter; telephone call to and from Hearing Examiner regarding new hearing dates; telephone calls to clients regarding new hearing date; additional Westlaw legal research regarding admissibility of investigative reports; telephone call to FPC regarding subpoenas and new date.	1.50	165.00

Mr. Ronald Leonhardt

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	<u>Hours</u>	<u>Amount</u>
10/27/2011 Finish Motion in Limine; revise Witness and Exhibit List.	0.90	99.00
10/28/2011 Receive and review e-mail from Hearing Examiner; response to same; receive and review correspondence from same regarding new pretrial.	0.20	22.00
11/1/2011 Telephone call from Hearing Examiner regarding pretrial.	0.10	11.00
11/2/2011 Review documents at issue; intra-office conference with Cermele; travel; attend pre-trial; return travel; intra-office conference with Cermele regarding same and potential witnesses; memo to file.	2.30	253.00
11/9/2011 Telephone call to and from Atty. Carter regarding hearsay documents and evidence.	0.20	22.00
11/10/2011 Telephone call from FPC regarding subpoenas; receive and review e-mail from same regarding same; response regarding same.	0.30	33.00
11/15/2011 Telephone call from MPD Detective regarding testifying.	0.20	22.00
11/22/2011 Receive and review correspondence from PO Meinecke; receive and review e-mails from FPC regarding subpoenas; responses regarding same.	0.30	33.00
11/23/2011 Several telephone calls to MFD witnesses; memo to file.	0.60	66.00
11/28/2011 Trial preparation; meeting with MPD Personnel regarding officer responsibilities.	4.20	462.00
11/29/2011 Trial preparation; memo to file; intra-office conference with Cermele regarding witnesses; several telephone calls from FPC regarding MPD witness; telephone call to FPC; telephone call to MPD Detective; intra-office conference with Cermele; meeting with MPD Personnel; telephone call from MPD Detective; telephone call from Atty. Carter; office conference with clients; telephone call to Cermele regarding warrant.	5.10	561.00

	<u>Hours</u>	<u>Amount</u>
11/30/2011 Finish hearing preparation; travel; meeting with MPD Detective (witness); meeting with clients; meeting with PO Bruns (witness); attend trial; return travel; telephone call to Cermele regarding hearing; texts to and from client regarding hearing.	8.70	957.00
12/2/2011 Intra-office conference with Cermele regarding hearing; intra-office conference with Cermele regarding potential Phase II; telephone call to and from MPD; telephone call from FPC; Westlaw legal research regarding admitting summary evidence but excluding evidence.	0.90	99.00
Telephone call to FPC regarding additional hearing date.	0.10	11.00
12/12/2011 Telephone call from FPC regarding additional hearing date; receive and review e-mails from same; e-mails in response; receive and review correspondence from MPD regarding PO Lidwin and PO Meinecke and Phase II information.	0.40	44.00
12/14/2011 Intra-office conference with Cermele regarding new evidence; review Castenada decision; intra-office conference with Cermele regarding decision and findings; Westlaw research; receive and review e-mails from FPC; telephone call to Hearing Examiner; receive and review e-mails from same with attachments; review WI Trial Practice.	1.20	132.00
12/15/2011 Telephone call to and from Hearing Examiner Carter regarding new documents and motion(s); additional research regarding FPC Executive Director's Authority to re-open record.	0.70	77.00
12/16/2011 Receive and review e-mail from Hearing Examiner Carter; intra-office conference with Cermele regarding Motion.	0.20	22.00
12/19/2011 Receive and review e-mail from Atty. Carter.	0.10	11.00
12/20/2011 Review grounds for motion to exclude evidence.	0.40	44.00
12/23/2011 Work on new Motion to "Exclude" and Continuance; telephone call from Hearing Examiner Carter; intra-office conferences with Cermele regarding Motion; revisions to Motion per Cermele; send	1.10	121.00

	<u>Hours</u>	<u>Amount</u>
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same to Hearing Examiner Carter; telephone call from Hearing Examiner Carter's office.

12/30/2011	Review Phase II protocol.	0.30	33.00
1/7/2012	Telephone call from Hearing Examiner Carter and Harris-Brown regarding Motion hearing; telephone calls from Hearing Examiner Carter regarding same; receive and review e-mail from Hearing Examiner Carter regarding same.	0.30	33.00
1/12/2012	Review file; finalize Motion arguments; memo to file; intra-office conference with Cermele; meeting with MPD Personnel regarding Felony Checklist and application to case; intra-office conference with Cermele regarding same; telephone call from Hearing Examiner regarding complainant's unavailability; telephone call from Hearing Examiner regarding motion arguments, argue motions and withdraw of initial motion; intra-office conference with Cermele regarding same.	1.60	176.00
1/13/2012	Receive and review correspondence from FPC regarding hearing continuation.	0.10	11.00
1/16/2012	Telephone calls to Hearing Examiner regarding Motion.	0.20	22.00
1/19/2012	Receive and review e-mail from FPC regarding errors in Hearing Examiner's decision.	0.10	11.00
1/20/2012	Telephone call from FPC regarding new hearing date; receive and review e-mail from same regarding same.	0.20	22.00
1/24/2012	Telephone call to clients regarding motion hearing and adjournment; e-mail to FPC confirming new hearing date; receive and review correspondence from Hearing Examiner regarding Motion Decision.	0.40	44.00

	<u>Hours</u>	<u>Amount</u>
1/25/2012 Texts to and from PO's Meinecke and Lidwin regarding new dates for hearing; e-mails to FPC regarding same; receive and review several e-mails from FPC regarding same; telephone call to and from clients regarding same.	0.30	33.00
1/30/2012 Receive and review e-mail from Hearing Examiner with Amended Motion Decision; review Amended Decision.	0.30	33.00
1/31/2012 Telephone call to and from FPC.	0.10	11.00
2/1/2012 Telephone call to and from FPC regarding hearing dates.	0.20	22.00
2/2/2012 Receive and review e-mail from FPC regarding hearing date; text to both clients regarding same.	0.20	22.00
2/8/2012 Receive and review correspondence from FPC.	0.10	11.00
2/14/2012 Receive and review e-mails from Court Reporter; response regarding same.	0.20	22.00
2/17/2012 Texts to and from Meinecke regarding additional FPC investigation being conducted.	0.10	11.00
2/20/2012 Meeting with MPD; receive and review notice of transcript availability.	0.20	22.00
2/23/2012 Receive and review e-mail from court reporter; begin reviewing transcript; receive and review several e-mails from FPC; responses regarding same; intra-office conference with Cermele; telephone calls to Hearing Examiner Carter.	1.70	187.00
2/24/2012 E-mail from FPC regarding changing hearing date; continue review of transcript; e-mails to and from FPC; telephone call from Hearing Examiner; telephone call to Cermele; telephone calls to clients regarding availability for new hearing date; telephone call from Cermele regarding same; telephone calls to PO Meinecke regarding new hearing date; telephone call to Hearing Examiner.	0.50	55.00

Mr. Ronald Leonhardt

	<u>Hours</u>	<u>Amount</u>
2/27/2012 E-mails from and to FPC.	0.20	22.00
3/5/2012 Complete review of transcript.	1.60	176.00
4/17/2012 Telephone call to FPC regarding subpoenas; telephone call from FPC regarding same.	0.30	33.00
4/23/2012 Review file for potential subpoenas; discuss with Cermele; telephone call to Hearing Examiner regarding phase 2; review statute regarding same; review prior Atty notes; begin hearing prep.	1.10	121.00
4/24/2012 Hearing prep; review transcript, telephone call and texts to and from both clients; notes to file regarding same; telephone call to Cermele.	2.20	242.00
4/25/2012 Intra-office conference with Cermele regarding case prep; finish reviewing all relevant documents; prepare exhibits; prep Crivello for testimony; travel to City Hall for hearing; attend 2nd trial (Phase I); office conference with clients (both); attend Phase II hearing; return travel, attorney's notes to file, review appeal procedure; telephone call to and from Cermele regarding hearing.	7.50	825.00
4/27/2012 Review file; intra-office conference with Cermele regarding incomplete record.	0.30	33.00
4/30/2012 Telephone call to Hearing Examiner regarding incomplete record.	0.20	22.00
5/1/2012 Office conference with client (Lidwin) regarding appealing; intra-office conference with Cermele regarding same.	0.40	44.00
5/2/2012 Telephone call from Hearing Examiner regarding exhibits; review transcript for references to Exhibit 8a.	0.40	44.00
5/3/2012 Receive and review email from Hearing Examiner regarding incomplete record; discuss same with Cermele; email to Carter regarding exhibit problems and incomplete record.	0.30	33.00

	<u>Hours</u>	<u>Amount</u>
5/4/2012 Receive and review email from FPC regarding exhibits with attachments; Receive and review email from Hearing Examiner regarding same, reply to same; telephone call to Hearing Examiner regarding same.	0.40	44.00
5/7/2012 Receive and review FPC Decision.	0.40	44.00
5/9/2012 Office conference with client (PO Lidwin) and Cermele regarding strategy for moving forward with case; intra-office conference with Cermele regarding same.	0.70	77.00
Draft Petition for Certiorari.	0.50	55.00
Office conference with PO Meinecke	0.70	77.00
5/10/2012 Office conference with Meinecke and Cermele regarding moving forward with appeal; intra-office conference with Cermele regarding same; review charging documents.	1.00	110.00
5/14/2012 Telephone call to FPC regarding exhibit 8a being restored to original copy; review cases regarding Certiorari.	1.10	121.00
5/15/2012 Review file; additional research; receive and review email from court reporter with transcript attached, review transcript; intra-office conference with Cermele regarding FPC appeal; telephone call to FPC regarding file on appeal documents; travel to FPC and City Attorney's office to file statutory appeal; return travel.	3.20	352.00
5/16/2012 Telephone call from Hearing Examiner regarding record; continue work on Cert. Complaint; additional legal research into appeal factors; telephone call to Cermele regarding research findings.	1.10	121.00
5/18/2012 Telephone call to and from FPC (Janusz) regarding exhibits.	0.20	22.00
5/23/2012 Edit Cert complaint.	0.20	22.00

	<u>Hours</u>	<u>Amount</u>
6/5/2012 Receive and review email from ACA Houren regarding appeal; intra-office conference with Cermele regarding same; research issue; email to Atty. Houren/FPC Janusz regarding same.	0.60	66.00
6/6/2012 Receive and review email from FPC; intra-office conference with Cermele; email to ACA Houren regarding filing Statutory Appeal; telephone call from FPC regarding 62.50(20) and (21).	0.50	55.00
6/7/2012 Intra-office conference with Cermele regarding FPC conversation (6/6/12).	0.20	22.00
6/8/2012 Receive and review emails from ACA Houren regarding statutory appeal, reply to same.	0.20	22.00
6/11/2012 Receive and review email from ACA Houren; reply to same.	0.20	22.00
6/15/2012 Receive and review email from Houren; reply to email and discuss with Cermele.	0.20	22.00
6/28/2012 Receive and review correspondence from Circuit Court regarding Statutory Appeal; intra-office conference with Cermele regarding same.	0.20	22.00
7/10/2012 Intra-office conference with Cermele regarding briefing; email to ACA Houren regarding same.	0.20	22.00
7/12/2012 Receive and review email from ACA Houren; telephone call to same regarding filing Certiorari Appeal and consolidating cases; intra-office conference with Cermele regarding same; Westlaw research on "exceeding jurisdiction" and "incorrect theory of law".	2.30	253.00
7/18/2012 Finish Cert Complaint; work on stip and order for consolidation; review local rules and state statute on consolidation; email to Assistant City Attorney Houren regarding stipulation for consolidation.	0.90	99.00
7/19/2012 Draft summons; Receive and review email from ACA Houren; reply to same; file Certiorari Complaint; update stip and proposed order; travel to Milwaukee City Attorney's Office for meeting	2.10	231.00

	<u>Hours</u>	<u>Amount</u>
with ACA Houren; return travel; file proposed order and stip; return travel.		
8/6/2012 Receive and review correspondence from Circuit Court regarding Order and Stip to consolidate.	0.10	11.00
8/9/2012 Receive and review correspondence from ACA Houren regarding Cert Appeal; discuss with Cermele; memo to file.	0.30	33.00
8/22/2012 Telephone call to Judge Witkowiak's clerk regarding consolidation; Receive and review email from ACA Houren regarding consolidation; email to Cermele for review; email to Houren regarding stip and directions and phone conference with Judge Witkowiak.	0.40	44.00
8/29/2012 Receive and review emails from ACA Houren; emails to same regarding consolidation; telephone call to Judge Witkowiak's clerk; email to Houren regarding phone conference on 9/7; receive and review email from Houren regarding status conference and briefing schedule; reply to email.	0.50	55.00
9/4/2012 Receive and review correspondence from Circuit Court (Stip./Order/Consent).	0.10	11.00
9/7/2012 Telephone call to and from ACA Houren regarding case; conference call with same and Judge Witkowiak regarding briefing schedule and discovery memo.	0.60	66.00
9/13/2012 Westlaw research on discovery in Cert case; review Heil decision; intra-office conference with Cermele regarding same; telephone call to Hearing Examiner.	1.00	110.00
9/14/2012 Telephone call to and from Hearing Examiner; legal research; work on discovery brief; telephone call to Cermele regarding phone records/legal research.	1.60	176.00

	<u>Hours</u>	<u>Amount</u>
9/17/2012 Receive and review e-mails from ACA Houren regarding discovery; intra-office conference with Cermele regarding same; e-mails to ACA Houren; correspondence to Judge Witkowiak regarding discovery.	0.60	66.00
9/18/2012 Receive and review e-mail from ACA Houren regarding letter to Court; draft same; telephone call from ACA Houren regarding same; intra-office conference with Cermele; texts to and from KS regarding Matthews' phone records; telephone call to Hearing Examiner regarding same and evidence of Executive Director Tobin interfering in deliberations.	0.60	66.00
9/26/2012 Receive and review email from ACA Houren regarding documents for the record; reply to same; intra-office conference with Cermele regarding briefing schedule; email to ACA Houren regarding same.	0.40	44.00
9/28/2012 Receive and review e-mail from ACA Houren (x3) regarding briefing schedule; reply to e-mails (x4).	0.40	44.00
10/1/2012 Receive and review numerous e-mails from ACA Houren regarding briefing with attachments, reply to same with proposed stipulation; telephone call to ACA Houren regarding briefing.	0.30	33.00
10/4/2012 Receive and review correspondence from ACA Houren regarding Briefing schedule; telephone call to Judge Witkowiak's clerk; e-mail to ACA Houren regarding same; Receive and review e-mail from same regarding same.	0.40	44.00
11/2/2012 Begin review of file for Primary Brief.	1.00	110.00
11/5/2012 Continue file review; draft timeline of events; review caselaw; read SOPs that have relevance; intra-office conference with Cermele regarding same; e-mail to Fire and Police Commission regarding Code of Conduct; receive and review e-mail from same regarding same; reply.	5.10	561.00

	<u>Hours</u>	<u>Amount</u>
11/6/2012 Continue work on Primary Brief; review documents from Heil decisions (Circuit Court File, approx. 400 pages); attorney's notes to file.	5.30	583.00
11/7/2012 Continue review of documents; work on timeline; work on Appeal strategy; intra-office conference with Cermele regarding brief format; work on Matthews Affidavit documents.	2.10	231.00
11/8/2012 Continue work on Primary Brief.	3.20	352.00
11/9/2012 Continue work on Primary Brief.	2.10	231.00
11/12/2012 Continue work on Primary Brief; additional Westlaw caselaw and statutory research.	3.80	418.00
11/16/2012 Draft cover letter; draft Matthews affidavit; pull documents for affidavit; draft Cermele affidavit; intra-office conference with Cermele regarding certain brief sections (x4); revise brief; additional SOP conversations; edit brief; file same.	3.10	341.00
11/19/2012 E-mail to ACA Houren regarding Brief (x2); receive and review e-mail from Houren regarding same.	0.30	33.00
11/20/2012 Receive and review e-mail from ACA Houren (x3); reply to same (x3).	0.40	44.00
12/4/2012 E-mail to Hearing Examiner with courtesy copy of Brief attached; telephone call from Lidwin regarding Brief, review documents per Lidwin.	0.30	33.00
12/13/2012 E-mail to ACA Houren regarding brief deadlines.	0.10	11.00
12/14/2012 Receive and review e-mail from ACA Houren (x2); reply to e-mail (x2).	0.30	33.00

	<u>Hours</u>	<u>Amount</u>
12/18/2012 Receive and review e-mail from ACA Houren (x3); reply to e-mails; receive and review e-mail with stipulation attached; review and sign stipulation; e-mail to ACA Houren with stipulation attached.	0.40	44.00
12/19/2012 Receive and review correspondence from ACA Houren regarding new briefing schedule.	0.10	11.00
12/26/2012 Receive and review correspondence from ACA Houren; telephone call from same regarding new brief deadline.	0.20	22.00
12/27/2012 Telephone call from ACA Houren regarding Matthews Affidavit.	0.20	22.00
12/31/2012 E-mail to ACA Houren; receive and review e-mail from same (x2); begin reviewing City's Response Brief.	1.00	110.00
1/2/2013 Receive and review e-mail from ACA Houren; reply to e-mail; work on Reply to Motion to Strike (regarding Affidavits); review cases cited by City (x7); attorney's notes regarding documents; draft strategy outlines for Reply to Motion to Strike affidavits and Reply Brief; review Matthews affidavit; review Milwaukee local rules.	3.90	429.00
1/3/2013 Review all cases cited by ACA Houren in City's Brief; notes to file; work on Reply Brief theory; additional Westlaw research.	4.10	451.00
1/7/2013 Continued work on Reply Brief; Westlaw Affidavit research.	2.20	242.00
1/8/2013 Continued work on Reply Brief; revise brief outline and perform additional Westlaw case research.	2.00	220.00
1/9/2013 Continued work on Reply Brief.	2.90	319.00
1/11/2013 Intra-office conference with Cermele regarding Reply Brief strategy and legal decisions; attorney's notes to file; office conference with Buetow regarding MPD SOPs/rules interplay; attorney's notes to file.	2.50	275.00

	<u>Hours</u>	<u>Amount</u>
1/13/2013 Continued work on Reply Brief.	1.50	165.00
1/14/2013 Revise Reply Brief.	2.40	264.00
1/16/2013 Draft cover letter; research for Reply to Motion to Strike; intra-office conference with Cermele regarding same; continue drafting reply to motion to strike; revise same.	2.10	231.00
1/17/2013 Final revisions on Reply Brief; finalize Response to Motion to Strike; file documents.	1.90	209.00
1/30/2013 Receive and review correspondence from ACA Houren regarding Reply to Response to Motion to Strike; attorney's notes regarding same; e-mail to ACA Houren.	0.40	44.00
1/31/2013 Receive and review e-mail from ACA Houren; telephone call to same regarding Reply to Motion to Strike; review file (relevant documents); legal research regarding supplementing record and Wis Stats 227; numerous intra-office conference with Cermele regarding all; begin drafting reply to defendant's reply to strike.	3.00	330.00
2/1/2013 Westlaw research and numerous intra-office conferences with Cermele regarding reply to response to defendant's motion to strike.	1.50	165.00
5/1/2013 Review Circuit Court Decision reversing FPC; discuss same with Cermele.	0.90	99.00
5/20/2013 Receive and review e-mail from ACA Houren regarding repayment to Clients; reply to e-mail.	0.20	22.00
5/30/2013 Receive and review correspondence from ACA Houren regarding repayment to clients; draft correspondence to client (both) regarding same.	0.30	33.00
5/31/2013 E-mail to clients regarding repayment (x3); texts to and from Lidwin regarding same; close file.	0.20	22.00

Mr. Ronald Leonhardt

<u>Hours</u>	<u>Amount</u>
152.50	\$16,775.00

For professional services rendered

Costs Incurred/Disbursements Made:

8/25/2011 Mileage	5.55
Parking	2.00
11/2/2011 Mileage	5.55
Parking	2.75
11/30/2011 Mileage	5.55
Parking	18.00
2/20/2012 Transcript of 11/30/11 hearing	912.60
4/25/2012 Parking	6.00
Mileage	5.55
5/15/2012 Parking	1.50
Mileage	6.66
5/25/2012 Transcript of hearing on April 25, 2012	189.85
7/18/2012 Filing fee for Writ of Certiorari	133.50
7/19/2012 Mileage	17.76
Parking	6.50
11/16/2012 Mileage	4.44
Postage -	5.30

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Amount

11/16/2012

1.00

11/28/2012 Mileage

5.55

Parking

1.50

1/17/2013 Mileage

11.30

Parking

2.00

Mileage

5.65

Total Costs/Disbursements

\$1,356.06

Total amount of this bill

\$18,131.06

Balance due

\$18,131.06