

KRAMER RAYSON LLP

P.O. Box 629

Knoxville, TN 37901

Phone (865) 525-5134 Tax ID No. 62-0920653

April 6, 2015

**Loudon County Government
100 River Rd., #109
Loudon, TN 37774**

**Bill # 101793
File# 02405-00215**

Truitt, Richard

BILLING SUMMARY THROUGH March 31, 2015

Services Rendered	\$3,801.50
Expenses and Advances	\$313.40
Total	\$4,114.90
CURRENT BILL	\$4,114.90

**Please make all checks payable to:
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Truitt, Richard

PROFESSIONAL SERVICES THROUGH March 31, 2015

03/06/15	RLB	Work on numerous ORA issues, phone calls with officials, draft response letter, e-mails to and from officials regarding ORA issues and miscellaneous other County matters.	1.20	Hrs.
03/07/15	RLB	Work on ORA issues, begin review of relevant controlling law.	0.90	Hrs.
03/10/15	RLB	Attend call, e-mail to Mr. Truitt, conversation with official regarding request.	0.70	Hrs.
03/11/15	RLB	Phone call with county official regarding whether Mr. Truitt has agreed to provide search times in order to avoid expense to the County.	0.20	Hrs.
03/15/15	RLB	Review research memoranda, e-mail to County official regarding fact Mr. Truitt has not responded to request for specific documents to research, further work on file.	0.70	Hrs.
03/16/15	RLB	Numerous e-mails to and from County IT and County official regarding production of documents, phone call with elected official regarding records, travel to Commissioner workshop in anticipation of issues being raised by Mr. Truitt's counsel and return to office.	1.70	Hrs.
03/17/15	RLB	Receive numerous e-mails to and from County IT Department regarding document productions, phone call with County official, conference with LAS regarding production documents, phone call with two County officials to make inquiries concerning production documents, memo to file regarding Commissioners' responses.	0.60	Hrs.
03/18/15	RLB	Communications with County officials relative to election of agenda change documents, phone calls and e-mail to communications regarding same, review documents for production, e-mail to Linda Noe for production of agenda change document, receive and review additional documents from IT Director.	0.50	Hrs.

03/18/15	LAS	Office conference with RLB re: new client documents to prepare for production; Electronic management of same; Preparation of production documents.	0.70	Hrs.
03/19/15	RLB	E-mail to Plaintiff's counsel to produce agenda change, e-mails, phone call from Plaintiff's counsel, e-mail from Mr. Truitt's counsel regarding privilege, conference with Mayor Bradshaw, conference with Commissioner regarding privilege issues.	0.90	Hrs.
03/20/15	RLB	Draft attorney-client privilege e-mail to Commissioners, phone call with Commissioner regarding e-mail.	0.70	Hrs.
03/20/15	RLB	Numerous phone calls with County officials regarding response, extensive phone call with Mr. Truitt's counsel, production e-mail to Mr. Truitt's counsel regarding additional e-mail, work on extensive communication with Commissioners relative to preservation obligations regarding issue relative to Mr. Truitt's request.	1.10	Hrs.
03/24/15	RLB	E-mails from Commission regarding production of documents from business e-mail server (x 3).	0.20	Hrs.
03/24/15	RLB	Numerous e-mails from Mr. Truitt's counsel.	0.20	Hrs.
03/24/15	RLB	E-mails to Commissioners regarding collection of documents.	0.20	Hrs.
03/24/15	RLB	Phone call with Commissioner regarding personal e-mail accounts and other matters.	0.30	Hrs.
03/25/15	RLB	Phone call with Commissioners regarding additional documents to be produced (x 3).	0.30	Hrs.
03/27/15	LAS	Receipt of additional e-mails from RLB forwarding Loudon County e-mails; Electronic management of same; Bates labeling process for all e-mails received; Preparation of RLB's working documents.	0.60	Hrs.
03/30/15	RLB	Receive additional e-mail from various Commissioners, work on production with LAS, e-mail to Linda Noe regarding production.	0.50	Hrs.
03/30/15	LAS	Office conference with RLB re: preparing production documents; Detailed redaction process for specific documents to be produced; Receipt of additional client documents via e-mail; Electronic management of same; Receipt of additional client documents from RLB; Electronic management of same; Final preparation of production documents.	1.80	Hrs.
03/31/15	RLB	Phone call with Commissioners (x 2) regarding documents, travel to County office building to review documents with Ms. Green and the Mayor, return to office, further work with LAS on document production, numerous e-mails to and from Steve Fritz regarding problems with electronic version of documents previously produced.	2.90	Hrs.

03/31/15 LAS Receipt of additional client documents; Electronic management of same; 0.60 Hrs.
work on production documents.

Total Fees **\$3,801.50**

Init.	Name	Rate	Hours	Amount
RLB	Bowman, Robert L.	250.00	13.80	3,450.00
LAS	Schaad, Lisa A.	95.00	3.70	351.50

EXPENSES

03/18/15	Mileage - 76 miles @ .575 per mile			\$43.70
03/20/15	Photocopies - 2,564 copies @ .10 each			\$256.40
03/30/15	Photocopies - 133 copies @ .10 each			\$13.30

Total Expenses **\$313.40**

BILLING SUMMARY

Services Rendered	\$3,801.50
Expenses and Advances	<u>\$313.40</u>
Total	\$4,114.90
Balance Forward	\$0.00
BALANCE DUE	\$4,114.90

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May 6, 2015

**Loudon County Government
100 River Rd., #109
Loudon, TN 37774**

**Bill # 102212
File# 02405-00215**

Truitt, Richard

BILLING SUMMARY THROUGH April 30, 2015

Services Rendered	\$1,654.00
Expenses and Advances	\$286.65
Total	\$1,940.65
CURRENT BILL	\$1,940.65

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May 06, 2015

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100 River Rd., #109
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Bill # 102212
File # 02405 00215

Truitt, Richard

PROFESSIONAL SERVICES THROUGH April 30, 2015

04/01/15	RLB	Receive additional documents from the Commissioner, work with LAS in correcting issues with electronic documents provided by office county server, e-mail from ██████████ counsel, reply e-mail, e-mail to County official regarding document production.	1.10	Hrs.
04/02/15	RLB	Final review of documents to be submitted as production documents.	0.90	Hrs.
04/02/15	RLB	Phone call with ██████████ and ██████████ regarding logistics for production of documents, begin drafting privilege log, e-mails to and from ██████████ regarding questions relative to privilege log and other matters.	1.40	Hrs.
04/02/15	LAS	Detailed review of 4 volumes of RLB's working notebooks to locate which e-mails did not have auto populated headers; Switched those pages out with the replacement pages from the new 000001 to 002564 documents; Preparation of volume 5 working notebook for RLB; E-mails with RLB re: redaction of specific documents; Office conference with RLB re: production documents; Detailed preparation of production documents.	2.80	Hrs.
04/03/15	RLB	Work on Privilege Log, receive reply e-mail from Commissioner.	0.50	Hrs.
04/03/15	RLB	Receive additional e-mails from Commissioner and add to production.	0.30	Hrs.
04/06/15	RLB	E-mails to and from ██████████ regarding production, phone call with officials regarding production and request ██████████ to conduct same, final review of documents before submission to Mayor's office for inspection by Mr. Truitt.	0.90	Hrs.
04/06/15	LAS	Preparation of additional production documents.	0.40	Hrs.
04/25/15	RLB	Receive and review e-mail from ██████████, reply to ██████████ forward e-mail to ██████████ and client to review.	0.30	Hrs.

Total Fees **\$1,654.00**

Init.	Name	Rate	Hours	Amount
RLB	Bowman, Robert L.	250.00	5.40	1,350.00
LAS	Schaad, Lisa A.	95.00	3.20	304.00

EXPENSES

04/01/15	Mileage - 74 miles @ .575 per mile	\$42.55
04/02/15	Photocopies - Production Documents - 2441 copies @ .10 each	\$244.10

Total Expenses **\$286.65**

BILLING SUMMARY

Services Rendered	\$1,654.00
Expenses and Advances	<u>\$286.65</u>
Total	\$1,940.65
Balance Forward	\$0.00
BALANCE DUE	\$1,940.65

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June 1, 2015

**Loudon County Government
100 River Rd., #109
Loudon, TN 37774**

**Bill # 102608
File# 02405-00215**

Truitt, Richard

BILLING SUMMARY THROUGH May 31, 2015

Services Rendered	\$575.00
Expenses and Advances	\$0.00
Total	\$575.00
CURRENT BILL	\$575.00

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June 01, 2015

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PROFESSIONAL SERVICES THROUGH May 31, 2015

05/11/15	RLB	E-mails to and from [REDACTED] e-mail to county official regarding request.	0.20	Hrs.
05/12/15	RLB	E-mails to and from county official regarding index and other matters.	0.30	Hrs.
05/20/15	RLB	E-mails to and from [REDACTED] regarding electronic production of documents, communication [REDACTED] regarding same, opinion letter request to ORA counsel regarding [REDACTED] for [REDACTED] of record.	0.70	Hrs.
05/21/15	RLB	Work with Open Records Act Counsel regarding opinion, phone call with [REDACTED] regarding same, e-mails to [REDACTED] regarding calculation of cost for production, e-mails to [REDACTED] regarding same, e-mail from County employees regarding [REDACTED] of [REDACTED]	0.90	Hrs.
05/22/15	RLB	Phone call with [REDACTED] regarding various mundane questions relative to documents and attorney bill.	0.20	Hrs.

Total Fees

\$575.00

Init.	Name	Rate	Hours	Amount
RLB	Bowman, Robert L.	250.00	2.30	575.00

EXPENSES

Total Expenses

\$0.00

BILLING SUMMARY

Services Rendered	\$575.00
Expenses and Advances	<u>\$0.00</u>

"02405" Loudon Co. Government

Invoice# 102608

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Total \$575.00

Balance Forward \$0.00

BALANCE DUE \$575.00