

3. The legal services of Melissa R. Jelen and myself, partners at Cadwell Sanford Deibert & Garry LLP (“Cadwell Law Firm”), were billed at a rate of \$185.00 per hour in this matter. This rate is below our standard rate of \$250 per hour for such litigation matters.
4. The legal services of Andrew S. Hurd, an associate at the Cadwell Law Firm, were billed at a rate of \$165.00 per hour in this matter. This rate is below Mr. Hurd’s standard rate of \$200 per hour for such litigation matters.
5. I have been a partner at the Cadwell Law Firm for 41 years. My practice areas include insurance defense, civil litigation, mediations, and alternative dispute resolution. I am a former State Bar President, and I have served on various legal committees, including the South Dakota Bar Disciplinary Committee.
6. Melissa R. Jelen is a partner at the Cadwell Law Firm. She has been at the Cadwell Law Firm for 12 years, and her practice areas include insurance defense, civil litigation, business litigation, adoptions, guardianships and intellectual property rights. Melissa R. Jelen graduated Sterling Honors from the University of South Dakota Law School in 2009, ranked number one in her class. Prior to joining the Cadwell Law Firm, she served as the law clerk for the First Judicial Circuit for the State of South Dakota.
7. Andrew S. Hurd is an associate attorney at the Cadwell Law Firm. He has been at the Cadwell Law Firm since August 2021, and his practice area is general litigation. Andrew S. Hurd graduated cum laude from the University of South Dakota Knudson School of Law in 2020, and prior to joining the Cadwell Law Firm, he served as a law clerk for the Second Judicial Circuit for the State of South Dakota.
8. Attached as Exhibit A are the itemized invoices showing the legal services and costs incurred in these two matters. Descriptions of services that are protected by the attorney-

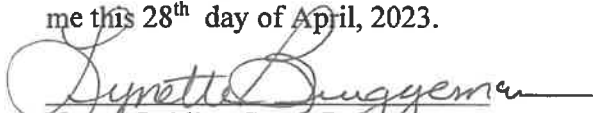
client privilege and work product doctrine have been redacted. Descriptions of services that are not related to these two matters have also been redacted.

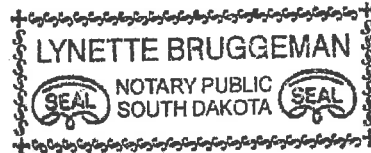
9. As of March 31, 2023, attorneys fees in the amount of \$23,824.50 have been incurred at the Cadwell Law Firm, which were necessarily incurred in defending these two matters.
10. As of March 31, 2023, costs in the amount of \$22.27 have been incurred at the Cadwell Law Firm, which were necessarily incurred in defending these two matters.

Dated this 28th day April, 2023.

By: 
William C. Garry

Subscribed and sworn before
me this 28th day of April, 2023.


Notary Public - South Dakota
My commission expires: 1/28/2027



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 28th day of April, 2023, a true and correct copy of the foregoing was served electronically using the Odyssey File and Serve system which will send notification of such filing to the following:

Joe Erickson
Lee Schoenbeck
Schoenbeck & Erickson, PC
1200 Mickelson Drive, Ste. 310
Watertown, SD 57201
joe@schoenbecklaw.com
lee@schoenbecklaw.com

Attorneys for Plaintiff

HUGHES LAW OFFICE

By: */s/ John R. Hughes* _____

John R. Hughes
101 East 38th Street
Sioux Falls, South Dakota 57105
Telephone: (605) 339-3939
Telecopier: (605) 339-3940
john@hugheslawyers.com

Attorneys for Respondents

CADWELL SANFORD DEIBERT & GARRY LLP
200 East 10th Street, Suite 200
Sioux Falls SD 57104
(605) 336-0828
TAX I.D.# 46-0234070

STATEMENT

South Dakota Public Assurance Alliance
c/o Claims Associates
PO Box 1898
Sioux Falls SD 57101

PAGE NO: 1
January 10, 2023

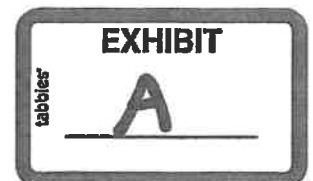
ACCOUNT NO: 5223351-005M
STATEMENT NO: 1

ATTN: Dave Sendelbach

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY -CLIENT PRIVILEGE
AND WORK PRODUCT DOCTRINE

		HOURS
12/01/2022	WCG Telephone call from John Hughes [REDACTED] [REDACTED] (.8)	0.80
12/02/2022	WCG Telephone call to Dave Sendelbach on [REDACTED] (.3), review and analyze Notice of Injury Pursuant to SDCL 3-21 and Notice of Appeal Pursuant to City's Zoning Regulations (.8); Verified Petition for Writ of Certiorari and Exhibits (89 pages) plus DANR warning letters to Brian Heft (60 pages) (1.8); Complaint seeking Declaratory Judgment with exhibits (197 pages) (1.8)	4.70
12/07/2022	WCG Review correspondence from John Hughes to counsel for Grant Park Capital on issues related to lack of subject matter jurisdiction (.3), telephone call from John Hughes on [REDACTED] (.3)	0.60
12/08/2022	WCG Review and analyze memo from Ryan Fods, City Maintenance Supervisor, on issues related to snow removal in Grant Park/Phillips Crossing, and emails between John Hughes and Anna Limoges on same	0.50
12/09/2022	WCG Review Baltic's Zoning and Subdivision Regulations (.8), brief research on [REDACTED] [REDACTED] (1.2)	2.00
12/19/2022	WCG E-mails to/from John Hughes on [REDACTED] [REDACTED]	



South Dakota Public Assurance Alliance

PAGE NO: 2
January 10, 2023

ACCOUNT NO: 5223351-005M
STATEMENT NO: 1

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY -CLIENT PRIVILEGE
AND WORK PRODUCT DOCTRINE

		HOURS
	(.4), review and analyze Motion for TRO/Injunction, Brief and Affidavits in Support of Motion (2.2)	2.60
12/20/2022	WCG Review and analyze City's Motion to Dismiss, Brief and Affidavit prepared by John Hughes and filed in the Petition for Writ of Certiorari matter, including review of cases cited in Brief (2.5), telephone conference with John Hughes and Melissa Jelen on [REDACTED] [REDACTED] (.7), emails to/from Judge Jon Sogn on Notice of Special Appearance for City of Baltic and hearing on Motion to Dismiss (.3), review and revise draft of Brief in Support of Motion to Dismiss in declaratory judgment action (1.5)	5.00
12/21/2022	WCG Telephone call from Anna Limoges on Notice of Appearance for City of Baltic and hearing on Motions to Dismiss (.4), telephone call from Attorney Alex Mastellar on Notice of Appearance and procedural issues (.4), draft Notice of Special Appearance in both lawsuits (.4), several calls to/from John Hughes on [REDACTED] [REDACTED] (.5), review proposed Development Agreement prepared by City (.5), review email string between John Hughes and Anna Limoges on discussion of issues/nature of dispute (.5), review final draft of Motion to Dismiss in declaratory judgment action, brief and affidavit (1.0), email to Dave Sendelbach on [REDACTED] [REDACTED] (.3)	4.10
12/28/2022	WCG Telephone call from Anna Limoges on City's Motion to Dismiss and hearing scheduled on appeal to Board of Adjustment	0.40
12/30/2022	WCG Review and analyze City's position relating to [REDACTED] [REDACTED] Garry, William C.	1.00 21.70
12/07/2022	MJ Preliminary review of Petition for Writ of Certiorari and exhibits, Summons and Complaint and exhibits, and other City records provided by John Hughes to analyze claims being made and potential defenses in anticipation of motion to dismiss	3.00
12/09/2022	MJ Review and analyze City of Baltic Subdivision	

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY -CLIENT PRIVILEGE AND
WORK PRODUCT DOCTRINE

			HOURS
		Regulations, ordinances and zoning ordinances, and SDCL Title 9, Title 11 and Title 31 to analyze Claimant's claims, defenses and defense strategy to Complaint and Petition for Certiorari (5.3); office conference with Bill Garry to discuss [REDACTED] (.3)	5.60
12/19/2022	MJ	Review application for TRO, preliminary injunction and permanent injunction, supporting affidavit of Hefty, affidavit of Limoges, affidavit of Petersen, proposed TRO, and Brief in support of motion for TRO and injunctive relief (2.0); review and analyze case law cited by Plaintiff in brief and analyze/evaluate options to respond to complaint and motion (2.0)	4.00
12/20/2022	MJ	Review and analyze motion for TRO and supporting documents and motion to dismiss and supporting affidavit and brief filed by City in petition for writ of cert action (2.5); phone conference with John Hughes to discuss [REDACTED] (.7); begin drafting motion to dismiss, supporting affidavit and brief in civil action (5.0)	8.20
12/21/2022	MJ	Review and revise motion to dismiss, affidavit of John Hughes, and Brief in Support of motion [REDACTED] and finalize the same for filing with the Court; multiple emails with John Hughes re: [REDACTED] (5.9); review documentation provided by John Hughes from prior matters in this case (2.0); numerous emails amongst counsel and Judge Sogn re: hearing and reassignment of case to a new judge (.2)	8.10
12/29/2022	MJ	Review petition for writ of cert, affidavit of Anna Limoges and complaint (1.2); outline issues [REDACTED] in preparation for meeting with opposing counsel and to [REDACTED] (1.2); review and evaluate [REDACTED] (1.3)	3.70
		Jelen, Melissa R.	32.60
12/19/2022	ASH	Research [REDACTED]	1.10
		Hurd, Andrew S.	1.10
FOR CURRENT SERVICES RENDERED			55.40
			10,227.00

South Dakota Public Assurance Alliance

PAGE NO: 4
January 10, 2023

ACCOUNT NO: 5223351-005M
STATEMENT NO: 1

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

RECAPITULATION

<u>TIMEKEEPER</u>	<u>Title</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Garry, William C.	Attorney	21.70	\$185.00	\$4,014.50
Jelen, Melissa R.	Attorney	32.60	185.00	6,031.00
Hurd, Andrew S.	Attorney	1.10	165.00	181.50

01/09/2023

Paid William C. Garry - 1/6/2023 mileage to/from Baltic for hearing (23 x .655 = \$22.27)

22.27

TOTAL EXPENSES

22.27

TOTAL CURRENT WORK

10,249.27

BALANCE DUE

\$10,249.27

CADWELL SANFORD DEIBERT & GARRY LLP
200 East 10th Street, Suite 200
Sioux Falls SD 57104
(605) 336-0828
TAX I.D.# 46-0234070

STATEMENT

South Dakota Public Assurance Alliance
c/o Claims Associates
PO Box 1898
Sioux Falls SD 57101

PAGE NO: 1
February 08, 2023

ACCOUNT NO: 5223351-005M
STATEMENT NO: 2

ATTN: Dave Sendelbach

REDACTIONS - ATTORNEY - CLIENT PRIVILEGE
AND WORK PRODUCT DOCTRINE

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

		HOURS
01/03/2023	WCG Continue review of [REDACTED] ir preparation for meeting with Hefty's counsel	1.20
01/04/2023	WCG Telephone call to John Hughes on [REDACTED] [REDACTED] (.4), telephone call from Anna Limoges on conference with Grant Park's counsel on appeal issues (.3)	0.70
01/05/2023	WCG Review emails from City's engineer on [REDACTED] [REDACTED] (.3), review emails between Hughes and Limoges on procedural issues for appeal hearing (.2), review Affidavit from DANR (.3), conference call with Melissa, John Hughes and Mayor on [REDACTED] [REDACTED] (1.2), review proposed development agreement (.5)	2.50
01/06/2023	WCG Review and analyze Affidavit of Kelli Buscher, DANR Program Administrator, along with Exhibits 1 - 6 indicating DANR's intent to commence enforcement action (.6), conference call with Melissa, Barry Sackett, Alex Mastellar, Andy Grocott and Anna Limoges on additional background and history of issues between City and Grant Park Capital and potential for resolution short of litigation (1.5), travel to Baltic (.5), attend appeal hearing before Board of Adjustment (1.0), conference with Mayor, Deb Mclsaac, City Attorney, John Hughes, and Planning and Zoning Chairman, Ed Wilson, on	

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY -CLIENT PRIVILEGE AND
WORK PRODUCT DOCTRINE

		HOURS
	[REDACTED] (.6), return to Sioux Falls (.5)	4.70
01/09/2023	WCG Review and analyze Board of Adjustments's decision on appeal	0.30
01/11/2023	WCG Telephone call to Dave Sendelbach on [REDACTED]	0.20
01/12/2023	WCG Review emails to/from John Hughes, Anna Limoges and Judge Barnett on status of Motions (.2), telephone call from Anna Limoges on hearing on Motions (.2)	0.40
01/13/2023	WCG Conference call with John Hughes and Melissa Jelen on [REDACTED] (.6), review and analyze additional information received from John Hughes on [REDACTED] (.4)	1.00
01/16/2023	WCG E-mails to/from Alex Mastellar and John Hughes on hearing on City's Motions to Dismiss (.4), review Grant Capital's proposed Development Agreement (.8), email to John Hughes on [REDACTED] (.2)	1.40
01/17/2023	WCG Telephone call from Alex Mastellar on issues raised in declaratory judgment action, proposed development agreement and hearing on Motion to Dismiss (.5), several calls to/from John Hughes on [REDACTED] (.4), telephone call from Court Administrator on hearing on Motion to Dismiss (.2)	1.10
01/18/2023	WCG Draft Notice of Hearing in both cases (.4), email to Dave Sendelbach on scheduled hearing on [REDACTED] (.2)	0.60
01/31/2023	WCG Review emails exchange between John Hughes and Anna Limoges on inquiry from Hammer Homes about building permits Garry, William C.	0.20 14.30
01/04/2023	MJ E-mails with John Hughes re: [REDACTED]	0.10
01/05/2023	MJ Conference call with Bill, John Hughes and Mayor Deb McIsaac to discuss [REDACTED]	

South Dakota Public Assurance Alliance

PAGE NO: 3
February 08, 2023

ACCOUNT NO: 5223351-005M
STATEMENT NO: 2

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY -CLIENT PRIVILEGE AND
WORK PRODUCT DOCTRINE

			HOURS	
		[REDACTED]	1.10	
01/06/2023	MJ	Review emails from City engineer and petition/motion in preparation for phone conference with Goosman (1.0); phone conference with Goosman lawyers and Bill Garry to discuss various issues and disputes between City of Baltic and Grant Park and strategy for exploring resolution and development (1.5); multiple emails from John Hughes re: [REDACTED] [REDACTED] (0.9)	3.40	
01/09/2023	MJ	Office conference with Bill Garry regarding [REDACTED]	0.20	
01/13/2023	MJ	Conference call with Bill and John Hughes to discuss [REDACTED] Jelen, Melissa R.	0.50 5.30	
		FOR CURRENT SERVICES RENDERED	19.60	3,626.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>Title</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Garry, William C.	Attorney	14.30	\$185.00	\$2,645.50
Jelen, Melissa R.	Attorney	5.30	185.00	980.50

TOTAL CURRENT WORK 3,626.00

PREVIOUS BALANCE \$10,249.27

01/20/2023 Received on account -10,249.27

BALANCE DUE \$3,626.00

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STATEMENT

South Dakota Public Assurance Alliance
c/o Claims Associates
PO Box 1898
Sioux Falls SD 57101

PAGE NO: 1
March 06, 2023
ACCOUNT NO: 5223351-005M
STATEMENT NO: 3

ATTN: Dave Sendelbach

REDACTIONS - ATTORNEY CLIENT PRIVILEGE, WORK
PRODUCT DOCTRINE, WORK RELATED TO THIRD
PENDING ACTION (49CIV23-310)

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

		HOURS
02/07/2023	WCG Receipt and review emails from John Hughes on [REDACTED] (.3), review and analyze Grant Park's Briefs in Opposition to Motions to Dismiss in both cases to plan response to same (2.2)	2.50
02/08/2023	WCG Conference call with John Hughs and Melissa Jelen on [REDACTED] (1.0) [REDACTED] review and analyze initial draft of Reply Brief in Support of Motions to Dismiss (.8)	1.80
02/09/2023	WCG Review and analyze draft of reply brief (.6), telephone call from John Hughes on [REDACTED] (.3), review and analyze edits to brief proposed by John Hughes (.6), [REDACTED]	1.50
02/10/2023	WCG Review final edits to reply brief (.3), email to Dave Sendelbach on [REDACTED] (.1), conference call with John Hughes and Melissa Jelen on [REDACTED] (.5)	0.90
02/14/2023	WCG Telephone call from Alex Mastellar on potential dismissal of pending lawsuits in exchange for City's agreement to move forward with specific requirements (.6), telephone call to John Hughes on Mastellar's proposal (.4), prepare	

South Dakota Public Assurance Alliance

PAGE NO: 2

March 06, 2023

ACCOUNT NO: 5223351-005M

STATEMENT NO: 3

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY CLIENT PRIVILEGE, WORK
PRODUCT DOCTRINE, WORK RELATED TO THIRD
PENDING ACTION (49CIV23-310)

		HOURS
	for and attend hearing on City's Motions to Dismiss (2.4)	3.40
02/15/2023	WCG Lengthy phone conference with Alex Mastellar on ramifications of Grant Park's litigation against City and plans to move forward with development (.8), email to Dave Sendelbach on [REDACTED] (.2)	1.00
02/20/2023	WCG Telephone call from Alex Mastellar on Grant Park's continued request for communication from City regarding requirements for moving forward with development	0.40
02/22/2023	WCG [REDACTED]	
02/27/2023	WCG Review document from John Hughes on [REDACTED]	0.50
02/28/2023	WCG [REDACTED] Garry, William C.	12.00
02/06/2023	MJ Review briefs in support of motions to dismiss two civil actions in preparation for receiving Plaintiff's response briefs and preparation of reply briefs	1.20
02/07/2023	MJ Review email from John Hughes re: [REDACTED]	0.20
	MJ Listen to numerous Meetings of Planning and Zoning Commission that are at issue in lawsuit in preparation for motion to dismiss hearing and reply brief in support of motion to dismiss	2.20
	MJ Review/analyze Declarations of Alex Mastellar and Grant Park's two response briefs in opposition to motions to dismiss	2.90
02/08/2023	MJ Draft Reply Brief in support of motions to dismiss in Petition for Writ of Cert case and civil action (7.7); phone call with John Hughes to discuss [REDACTED] (1.0); [REDACTED]	8.7

South Dakota Public Assurance Alliance

PAGE NO: 3

March 06, 2023

ACCOUNT NO: 5223351-005M

STATEMENT NO: 3

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY CLIENT PRIVILEGE, WORK
PRODUCT DOCTRINE, WORK RELATED TO THIRD
PENDING ACTION (49CIV23-310)

			HOURS
02/09/2023	MJ	Continue drafting/revising Reply Brief in Support of Motions to Dismiss in both cases	6.90
02/10/2023	MJ	Final review/ revisions to Reply Brief in Further Support of Motions to Dismiss, and incorporate John Hughes' suggested revisions	1.40
	MJ	Email courtesy copy of Reply Brief in Further Support of Motions to Dismiss to Judge Doug Barnett	0.20
	MJ	Phone call with John Hughes and Bill Garry to discuss [REDACTED]	0.30
02/13/2023	MJ	Review Brief in Support of Motion to Dismiss and Reply Brief in Support of Motion to Dismiss (1.5); prepare hearing oral argument outline [REDACTED] (1.2)	2.70
02/14/2023	MJ	Prepare for and attend hearing on Motions to Dismiss on behalf of the City of Baltic	2.40
02/17/2023	MJ	[REDACTED]	
02/20/2023	MJ	Multiple emails amongst counsel re: [REDACTED] [REDACTED]	0.30
02/21/2023	MJ	[REDACTED]	
	MJ	[REDACTED]	
	MJ	Emails amongst counsel re: [REDACTED]	0.30
02/22/2023	MJ	[REDACTED]	
	MJ	[REDACTED]	
02/28/2023	MJ	[REDACTED]	

South Dakota Public Assurance Alliance

PAGE NO: 4

March 06, 2023

ACCOUNT NO: 5223351-005M

STATEMENT NO: 3

Insured: City of Baltic
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Claim No.: GC22-113179

REDACTIONS - ATTORNEY CLIENT PRIVILEGE, WORK
PRODUCT DOCTRINE, WORK RELATED TO THIRD
PENDING ACTION (49CIV23-310)

MJ [REDACTED] HOURS

Jelen, Melissa R. [REDACTED] 29.70

FOR CURRENT SERVICES RENDERED [REDACTED]

TIMEKEEPER	RECAPITULATION	HOURS	HOURLY RATE	TOTAL \$
Garry, William C.	Attorney	12.0	\$185.00	2,220.00
Jelen, Melissa R.	Attorney	29.7	185.00	5,494.50
TOTAL CURRENT WORK			\$7,714.50	[REDACTED]
PREVIOUS BALANCE				[REDACTED]
BALANCE DUE				[REDACTED]

CADWELL SANFORD DEIBERT & GARRY LLP
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STATEMENT

South Dakota Public Assurance Alliance
c/o Claims Associates
PO Box 1898
Sioux Falls SD 57101

PAGE NO: 1
April 12, 2023
ACCOUNT NO: 5223351-005M
STATEMENT NO: 4

ATTN: Dave Sendelbach

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY CLIENT PRIVILEGE, WORK
PRODUCT DOCTRINE, WORK RELATED TO THIRD
PENDING ACTION (49CIV23-310)

		HOURS
03/02/2023	WCG Review lengthy email response from John Hughes to Alex Mastellar on proposed development agreements	0.60
03/03/2023	WCG [REDACTED]	
03/06/2023	WCG Phone conference with John Hughes and Melissa Jelen on [REDACTED]	0.50
03/07/2023	WCG Prepare for and attend hearing on Motion to Dismiss Civ. 22-2968 and Civ. 22-2573 (1.2), conference with Mayor and City Attorney on [REDACTED] (.8), email to Dave Sendelbach on [REDACTED] (.2)	2.20
03/13/2023	WCG Review transcript from Judge Barnett's oral ruling on City's motion to dismiss to determine scope of Order granting Motion	0.50
03/14/2023	WCG Review and revise proposed order granting City's Motion to Dismiss (.2), email to and from John Hughes on [REDACTED] (.3)	0.50

Insured: City of Baltic
 Claimant: Grant Park Capital, LLC
 Claim No.: GC22-113179

REDACTIONS - ATTORNEY CLIENT PRIVILEGE, WORK
 PRODUCT DOCTRINE, WORK RELATED TO THIRD
 PENDING ACTION (49CIV23-310)

		HOURS	
03/16/2023	WCG Telephone call from Alex Mastellar on proposed Order Granting City's Motions to Dismiss	0.30	
03/17/2023	WCG E-mails to/from John Hughes on [REDACTED] (2) telephone call from John on [REDACTED] (.2)	0.40	
03/21/2023	WCG Review Grant Park's proposed Order on Motions to Dismiss and Anna Limoges' communications with Judge Barnett on same Garry, William C.	0.20	5.2
03/02/2023	MJ [REDACTED]		
03/03/2023	MJ Emails amongst counsel and Judge Barnett re: additional authority submitted by Attorney John Hughes to support motions to dismiss	0.20	
	MJ [REDACTED]		
03/05/2023	MJ Review Anna Limoges' email to Judge Barnett arguing the application of the Hostler v Davison County Drainage Commission decision to the civil action and 2022 petition for writ of certiorari action	0.20	
03/06/2023	MJ Phone call with John Hughes and Bill Garry to discuss [REDACTED]	0.50	
03/07/2023	MJ Appear at hearing on Motions to Dismiss in civil declaratory judgment action and first petition for writ of certiorari filed by Grant Park and meet with clients and John Hughes and Bill Garry to discuss [REDACTED]	1.80	
	MJ Research procedure for [REDACTED] research statutory and case law authority to [REDACTED]	1.00	

South Dakota Public Assurance Alliance

PAGE NO: 3
April 12, 2023
5223351-005M
4

ACCOUNT NO:
STATEMENT NO:

Insured: City of Baltic
Claimant: Grant Park Capital, LLC
Claim No.: GC22-113179

REDACTIONS - ATTORNEY CLIENT PRIVILEGE, WORK
PRODUCT DOCTRINE, WORK RELATED TO THIRD
PENDING ACTION (49CIV23-310)

			HOURS
03/14/2023	MJ	Review and make suggested revisions to draft Order and Judgment for Dismissal prepared by John Hughes	0.90
03/16/2023	MJ	Emails between John Hughes and Alex Mastellar re: objection time to proposed order and judgment	0.20
03/17/2023	MJ	Email amongst Plaintiff's counsel and John Hughes re: proposed Order and Plaintiff's proposed revisions to the same	0.50
	MJ	Phone call with John Hughes re: [REDACTED]	0.50
	MJ	Review City Council meeting of March 14, 2023 discussing litigation update from John Hughes and public comment	0.70
	MJ	Email from John Hughes to Judge Barnett with proposed Order, and Respondent/Defendants' position re: same	0.20
03/21/2023	MJ	Review lengthy email from Anna Limoges to Judge Barnett and Plaintiff's proposed Order Jelen, Melissa R.	0.30

7.0

FOR CURRENT SERVICES RENDERED

RECAPITULATION

TIMEKEEPER	Title	HOURS	HOURLY RATE	TOTAL
Garry, William C.	Attorney	5.2	\$185.00	\$962.00
Jelen, Melissa R.	Attorney	7.0	185.00	\$1,295.00

TOTAL CURRENT WORK

\$2,257.00

PREVIOUS BALANCE

03/27/2023 Received on account

BALANCE DUE