

# Hughes Law Office

101 East 38th Street  
 Sioux Falls, SD 57105  
 accounting@hugheslawyers.com  
 O: (605) 339-3939

# INVOICE

Number	1036
Issue Date	3/31/2023
Matter	4816228 - Grant Park Phillips Crossing Issues

## REDACTIONS - ATTORNEY - CLIENT PRIVILEGE AND WORK PRODUCT DOCTRINE

### Bill To:

City of Baltic  
 Box 327  
 Baltic, SD 57003

### Flat Fees

Flat Fees	Billed By	Price	Qty	Sub
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### Time Entries

Time Entries	Billed By	Rate	Hours	Sub
3/13/2023 Telephone conference from Deborah; Work on draft of Order and Judgment of Dismissal; Email from Lacey attaching spreadsheet of lot sale and construction status in Grant Park/Phillips Crossing; Email from Court Reporter Lisa Carlson attaching Official Transcript of March 9, 2023 hearing and examine same; Email to Court Reporter Lisa Carlson	JRH	\$195.00	1.50	\$292.50
3/14/2023 Work on proposed draft of Order and Judgment of Dismissal; Examine Official Transcript for specific points ruled upon by Judge Barnett; Email to Attorney Bill Garry and Attorney Melissa Jelen; Work on revisions to proposed Email to Deborah attaching draft of Order and Judgment of Dismissal; Email to Attorney Bill Garry and Attorney Melissa Jelen attaching proposed draft of Order and Judgment of Dismissal; Telephone conference with Deborah; Email from Attorney Bill Garry and Attorney Melissa Jelen with revisions to draft of Order and Judgment of Dismissal; Email from Attorney Bill Garry and Attorney Melissa Jelen with final proposed draft of Order and Judgment of Dismissal; Draft email to opposing counsel with proposed draft of Order for and Judgment of Dismissal; Email from Attorney Limoges requesting additional time for response; Email to Attorney Limoges rejecting additional time; Email to Deborah and Ed Wilson; Email from Attorney Bill Garry; Email to Attorney Bill Garry; Email from Attorney Anna Limoges; Email to Attorney Anna Limoges; Email from Deborah; Email to Deborah; Telephone conference from Attorney Ann Mines Bailey; Department of Agriculture and Natural Resources	JRH	\$195.00	7.60	\$1,482.00



REDACTIONS - ATTORNEY - CLIENT PRIVILEGE AND WORK PRODUCT DOCTRINE

Time Entries	Billed By	Rate	Hours	Sub
<p>3/15/2023</p> <p>Telephone conference from Ryan Fods on Grant Park construction with pre-existing foundation permit and discuss authorization to proceed to next level of construction; Exchange text messages with Deborah and Ryan Fods to proceed with authorization; Telephone conference from Deborah; [REDACTED]</p>	JRH	\$195.00	1.00	\$195.00
<p>3/16/2023</p> <p>Email from Attorney Alex Mastellar requesting additional time to respond to proposed Order and Judgment of Dismissal emailed on Tuesday, March 15; Draft email response to Attorney Mastellar and opposing counsel; Email from Attorney Alex Mastellar; Email to Attorney Alex Mastellar; Email to Court Reporter Roxie Osborn on status of motions hearing transcript on February 14, 2023 before Judge Barnett;</p>	JRH	\$195.00	1.20	\$234.00
<p>3/17/2023</p> <p>Email from Attorney Alex Mastellar; Email to Attorney Alex Mastellar requesting substantial deletions to our proposed Order and Judgment of Dismissal and examine same; Legal research SD Supreme Court opinions on fact findings by the Court in ruling on a Motion to Dismiss for Lack of Subject Matter Jurisdiction under Rule 12(b)(5); Email to Attorney Bill Garry and Attorney Melissa Jelen attaching excerpts from Alone v. C. Brunsch, Inc., 2019 SD 41; Email from Attorney Alex Mastellar; Email to Attorney Bill Garry and Attorney Melissa Jelen requesting conference call; Email from Attorney Melissa Jelen; Email to Attorney Melissa Jelen; Email from Attorney Alex Mastellar; Email to Attorney Alex Mastellar; Email from Attorney Melissa Jelen; Email to Attorney Melissa Jelen; Telephone conference with Attorney Melissa Jelen; Telephone conference with Deborah; Work on extracting Judge Barnett's findings of fact from the Hearing Transcript on March 7; Work on draft of email to Judge Barnett; Email from Court Reporter Roxie Osborne; Email from Court Reporter Roxie Osborne; Draft email to Judge Barnett attaching proposed Order and Judgment of Dismissal in Word and pdf, Exhibit A Hearing, Transcript, and incorporating pages and lines corresponding to Judge Barnett's findings of fact at the March 7, 2023, Hearing; File proposed Order and Judgment of Dismissal and Exhibit A on Odyssey File and Serve; Email from Attorney Anna Limoges to Judge Barnett; Email from Judge Barnett; Email from Attorney Anna Limoges; Emails to Mayor, Council, and P&amp;Z attaching copies of all emails exchanged with opposing counsel and the Court, including proposed Order and Judgment of Dismissal in Word and pdf, Exhibit A Hearing, Transcript, and incorporating pages and lines corresponding to Judge Barnett's findings of fact at the March 7, 2023, Hearing</p>	JRH	\$195.00	4.30	\$838.50
<p>3/20/2023</p> <p>Email from Court Reporter Roxie Osborn; Email to Court Reporter Roxie Osborn; Email from Court Reporter Roxie Osborn; Email to Court Reporter Roxie Osborn; Email from Court Reporter Roxie Osborn; Email to Court Reporter Roxie Osborn; Email from Court Reporter Roxie Osborn; Email to Court Reporter Roxie Osborn; Email from Court Reporter Roxie Osborn; Email to Court Reporter Roxie Osborn; Email from Court Reporter Roxie Osborn; Telephone conferences with Deborah; [REDACTED]</p>	JRH	\$195.00	1.00	\$195.00



**REDACTIONS - ATTORNEY - CLIENT PRIVILEGE AND WORK PRODUCT DOCTRINE**

Expense	Billed By	Price	Qty	Sub
Trial transcripts 3/23/2023 Lisa Carlson Reporting; HLO Check #15055; transcript fees	MH	\$12.46	1.00	\$12.46
<b>Expenses Total:</b>			<b>2.00</b>	<b>\$16.26</b>

<b>Total (USD)</b>	<b>\$3,838.26</b>
<b>Paid</b>	<b>\$0.00</b>
<b>Balance</b>	<b>\$3,838.26</b>

**Terms & Conditions**

Statements are due and payable upon receipt

**Trust Account Balance**

Date	Item	Amount	Balance
<b>4/2/2023</b>	<b>Current Balance</b>		<b>\$0.00</b>