

The Russell Firm, LLC
 233 S. Wacker Drive
 84th Floor
 Chicago IL 60606

Paul Godfread

Invoice # 0000138
 Invoice Date September 29, 2015

Balance Due (USD)	\$51,870.91
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Task	Time Entry Notes	Rate	Hours	Line Total
Time	[02/28/13] Erin Russell: Draft and file Notice of Removal from Circuit Court of Cook County.	400.00	0.9	360.00
Time	[02/28/13] Erin Russell: Draft Motion to Correct Notice of Removal with exhibits.	400.00	0.5	200.00
Time	[03/01/13] Erin Russell: Received and reviewed email from Paul Duffy re: alleged amended complaint.	400.00	0.1	40.00
Time	[03/01/13] Erin Russell: Email to Paul Duffy requesting copy of purported amended St. Clair County complaint.	400.00	0.1	40.00
Time	[03/01/13] Erin Russell: Reviewed St. Clair County Court docket re: alleged amended complaint	400.00	0.3	120.00
Time	[03/01/13] Erin Russell: Telephone conference with P. Godfread re: alleged amended complaint	400.00	0.6	240.00
Time	[03/01/13] Erin Russell: Telephone conference with A. Cooper re: alleged amended complaint	400.00	0.2	80.00
Time	[03/01/13] Erin Russell: Review, edit and file Notice of Removal with exhibits.	400.00	0.7	280.00
Time	[03/02/13] Erin Russell: Telephone conference with P. Godfread re: alleged amended complaint	400.00	0.3	120.00
Time	[03/11/13] Erin Russell: Telephone conference with J. Sweet and P. Godfread re: allegations contained in Plaintiff's Motion to Remand	400.00	1.1	440.00
Time	[03/21/13] Erin Russell: Draft Answer to Complaint and Counterclaims;	400.00	2.7	1,080.00
Time	[03/21/13] Erin Russell: Review minute entry by	400.00	0.1	40.00

Judge Darrah setting for status. Advise client via email.

Time	[03/25/13] Erin Russell: Review minute order issued by Judge Darrah - draft email to client and Jason Sweet re: April status hearing.	400.00	0.1	40.00
Time	[04/10/13] Erin Russell: Received and reviewed Plaintiff's Motion to Remand to St. Clair County	400.00	1	400.00
Time	[04/10/13] Erin Russell: Telephone conference with P. Godfread re: Motion to Remand	400.00	0.5	200.00
Time	[04/10/13] Erin Russell: Confer with A. Cooper.	400.00	0.3	120.00
Time	[04/11/13] Erin Russell: Review Motion to Dismiss and Motion to Strike filed by Paul Duffy.	400.00	1.1	440.00
Time	[04/11/13] Erin Russell: Telephone conference with Jason Sweet re: Motion to Dismiss and Motion to Strike.	400.00	0.3	120.00
Time	[04/12/13] Erin Russell: Investigate circumstances surrounding filing of alleged amended complaint in St. Clair County (telephone calls to clerk's office and local counsel).	400.00	1.2	480.00
Time	[04/15/13] Erin Russell: Listen to voice mail left for P. Godfread by J. Steele and arrange for preparation of transcript.	400.00	1	400.00
Time	[04/16/13] Erin Russell: Research: Illinois law governing filing of amended complaints in removed cases.	400.00	1.7	680.00
Time	[04/16/13] Erin Russell: Draft Notice of Motion to accompany Anti-SLAPP Motion to Dismiss.	400.00	0.1	40.00
Time	[04/16/13] Erin Russell: Review and edit Motion to Dismiss pursuant to Minnesota Anti-SLAPP Act.	400.00	0.5	200.00
Time	[04/17/13] Erin Russell: Draft facts section for Response to Motion for Remand.	400.00	1.4	560.00
Time	[04/17/13] Erin Russell: Research: amended complaints, service and removal.	400.00	1.9	760.00
Time	[04/18/13] Erin Russell: Research: deadline for filing of motion to remand.	400.00	1.1	440.00
Time	[04/18/13] Erin Russell: Research effect of alleged amended complaint on diversity jurisdiction.	400.00	1.8	720.00
Time	[04/22/13] Erin Russell: Draft Motion to Stay Discovery pending resolution of Defendants' Anti-SLAPP Motion to Dismiss.	400.00	2.1	840.00

Time	[04/22/13] Erin Russell: Draft Notice of Motion for Motion to Stay.	400.00	0.1	40.00
Time	[04/23/13] Erin Russell: Travel to court for status hearing before Judge Darrah.	400.00	0.7	280.00
Time	[04/23/13] Erin Russell: Attend status hearing before Judge Darrah. Briefing schedule set for cross Motions to Dismiss and Motion to Strike Counterclaims.	400.00	1.5	600.00
Time	[04/23/13] Erin Russell: Email Jason Sweet and Paul Godfread re: briefing schedule. Godfread to update Cooper.	400.00	0.2	80.00
Time	[04/23/13] Erin Russell: Telephone conference with Jason Sweet regarding pending motions and allocation of responsibility in drafting responses.	400.00	0.6	240.00
Time	[04/23/13] Erin Russell: Travel from court.	400.00	0.6	240.00
Time	[05/06/13] Erin Russell: Draft and edit Response in Opposition to Motion to Remand.	400.00	2.7	1,080.00
Time	[05/06/13] Erin Russell: Confer with Laura Beasley re: affidavit of Judy Kent.	400.00	0.3	120.00
Time	[05/07/13] Erin Russell: Draft and edit Response in Opposition to Motion to Remand.	400.00	3.1	1,240.00
Time	[05/07/13] Erin Russell: Review finalized, signed affidavit of Judy Kent.	400.00	0.2	80.00
Time	[05/07/13] Erin Russell: Confer with J. Sweet and P. Godfread re: Kent affidavit.	400.00	0.4	160.00
Time	[05/08/13] Erin Russell: Review affidavit of Judy Kent.	400.00	0.3	120.00
Time	[05/09/13] Erin Russell: Draft and edit Response in Opposition to Motion to Remand.	400.00	1.6	640.00
Time	[05/10/13] Erin Russell: Final edit of Response in Opposition to Motion to Remand and review of exhibits.	400.00	1.5	600.00
General	[05/14/2013] Erin Russell: Travel from federal courthouse.	400.00	0.5	200.00
Time	[05/15/13] Erin Russell: Review Duffy Memorandum in Opposition to Defendants' Motion to Dismiss. Telephone conference with Jason Sweet.	400.00	0.9	360.00
Time	[06/06/13] Erin Russell: Review and Discuss Order from Judge Herndon denying Motion to Remand with J. Sweet and P. Godfread.	400.00	0.8	320.00
Time	[06/11/13] Erin Russell: Research and draft Motion to Reassign case ending 4341 to Judge	400.00	1.1	440.00

Darrah and Motion to Consolidate.

Time	[06/11/13] Erin Russell: Draft Notice of Motion for Motion to Transfer and Motion to Consolidate.	400.00	0.1	40.00
Time	[06/19/13] Erin Russell: Travel to federal courthouse for scheduled status hearing.	400.00	0.8	320.00
Time	[06/19/13] Erin Russell: Attend status hearing before Judge Darrah. Late arrival. Hearing re-set.	400.00	0.4	160.00
Time	[06/25/13] Erin Russell: Appear for status hearing before Judge Darrah.	400.00	1.1	440.00
Time	[06/25/13] Erin Russell: Travel to federal courthouse for status hearing before Judge Darrah.	400.00	0.7	280.00
Time	[06/25/13] Erin Russell: Draft email to Paul Duffy re: position on opposition to transfer and consolidation.	400.00	0.1	40.00
Time	[08/06/13] Erin Russell: Confer with P. Godfread.	400.00	0.3	120.00
Time	[08/12/13] Erin Russell: Review Plaintiff's Renewed Motion to Remand and discuss with J. Sweet and P. Godfread.	400.00	1.5	600.00
General	[08/14/2013] Erin Russell: Travel to federal courthouse.	400.00	0.5	200.00
Time	[08/14/13] Erin Russell: Appear for hearing on Plaintiff's Motion to Remand for Lack of Subject Matter Jurisdiction before Judge Darrah.	400.00	1.2	480.00
Time	[08/14/13] Erin Russell: Review Plaintiff's Motion to Withdraw Renewed Motion to Remand and discuss with J. Sweet and P. Godfread.	400.00	0.5	200.00
Time	[08/14/13] Erin Russell: Telephone conference with J. Sweet and P. Godfread re: outcome of hearing before Judge Darrah.	400.00	0.9	360.00
General	[08/14/2013] Erin Russell: Travel from federal courthouse.	400.00	0.7	280.00
Time	[08/14/13] Erin Russell: Review memorandum opinion issued by Judge Darrah.	400.00	0.9	360.00
Time	[08/16/13] Erin Russell: Draft and edit Response to Plaintiff's Renewed Motion to Remand.	400.00	2.4	960.00
Time	[08/16/13] Erin Russell: Confer with P. Godfread.	400.00	0.2	80.00

Time	[08/19/13] Erin Russell: Review and prepare exhibits to accompany Response to Plaintiff's Renewed Motion to Remand.	400.00	0.9	360.00
Time	[08/19/13] Erin Russell: Draft and edit Response to Motion to Remand.	400.00	1.5	600.00
Time	[08/20/13] Erin Russell: Final review of exhibits and edit of Response in Opposition to Renewed Motion to Remand.	400.00	0.9	360.00
Time	[08/20/13] Erin Russell: Attend status hearing and hearing on Plaintiff's Motion to Withdraw Renewed Motion to Remand before Judge Darrah.	400.00	1.2	480.00
Time	[08/20/13] Erin Russell: Confer with J. Sweet and P. Godfread re: hearing before Judge Darrah.	400.00	0.3	120.00
Time	[08/22/13] Erin Russell: Review transcripts of proceedings in preparation to file Rule 11 motion.	400.00	0.5	200.00
Time	[09/04/13] Erin Russell: Draft Motion for Extension of Time to File Rule 11 Motion, and Notice of Motion.	400.00	0.5	200.00
Time	[09/09/13] Erin Russell: Draft Motion for Sanctions and review related exhibits.	400.00	4.3	1,720.00
Time	[09/10/13] Erin Russell: Attend status hearing re: Motion for Sanctions.	400.00	1.1	440.00
Time	[09/10/13] Erin Russell: Confer with J. Sweet and P. Godfread.	400.00	0.3	120.00
Time	[09/13/13] Erin Russell: Draft Amended Counterclaim.	400.00	2.6	1,040.00
Time	[09/13/13] Erin Russell: Telephone conference with Jason Sweet re: amended counterclaims.	400.00	1.4	560.00
Time	[09/16/13] Erin Russell: Draft and file Amended Counterclaim.	400.00	2.1	840.00
Time	[09/24/13] Erin Russell: Telephone conference with Jason Sweet re: counterclaim issues and sanctions issues.	400.00	1.7	680.00
Time	[09/30/13] Erin Russell: Review Motion for Extension filed by Duffy.	400.00	0.2	80.00
Time	[10/07/13] Erin Russell: Draft and edit Reply in Support of Motion for Sanctions.	400.00	2.3	920.00
Time	[10/07/13] Erin Russell: Research General Order of Court pertaining to consent to service of process for Reply in Support of Motion for Sanctions.	400.00	0.4	160.00

Time	[10/08/13] Erin Russell: Travel to federal courthouse.	400.00	0.7	280.00
Time	[10/08/13] Erin Russell: Attend status hearing. Telephone conference regarding outcome of hearing with Jason Sweet and Paul Godfread. Godfread to advise Cooper.	400.00	1.8	720.00
Time	[10/22/13] Erin Russell: Review Duffy's Motion for Extension of Time to File Motion to Dismiss.	400.00	0.2	80.00
Time	[10/25/13] Erin Russell: Review minute entry by Judge Darrah granting Duffy Motion for Extension of Time. Advise Sweet and Godfread via email.	400.00	0.3	120.00
Time	[10/29/13] Erin Russell: Review Duffy Motion to Dismiss.	400.00	0.6	240.00
Time	[10/29/13] Erin Russell: Telephone conference with Jason Sweet re: Duffy Motion to Dismiss.	400.00	0.4	160.00
Time	[11/06/13] Erin Russell: Review sanctions order issued against Prenda by Judge Noel in Minnesota.	400.00	0.4	160.00
Time	[11/21/13] Erin Russell: Review Judge Darrah's Order granting Defendants' Motion for Extension of Time. Email Sweet and Godfread to advise.	400.00	0.3	120.00
Time	[11/25/13] Erin Russell: Research and draft Response in Opposition to Motion to Dismiss Amended Counterclaims.	400.00	1.2	480.00
Time	[11/26/13] Erin Russell: Draft Response in Opposition to Motion to Dismiss Amended Counterclaim. Filed with exhibits.	400.00	1.7	680.00
Time	[11/27/13] Erin Russell: Review sanctions order against Prenda by Judge Murphy in the Southern District of Illinois.	400.00	0.4	160.00
Time	[11/27/13] Erin Russell: Telephone conference with J. Sweet and P. Godfread re: Noel and Murphy sanctions orders.	400.00	0.8	320.00
Time	[12/10/13] Erin Russell: Draft and submit Notice of Supplemental Authority re: Noel and Murphy sanctions orders against Prenda in support of Motion for Sanctions.	400.00	0.5	200.00
Time	[01/22/14] Erin Russell: Review Plaintiff's Motion for Leave to File Surreply to Motion for Sanctions.	400.00	0.4	160.00
Time	[01/23/14] Erin Russell: Attend hearing re: ruling on Motion for Sanctions before Judge	400.00	1.3	520.00

Darrah.

Time	[01/23/14] Erin Russell: Telephone conference with J. Sweet and P. Godfread re: ruling on Motion for Sanctions.	400.00	0.7	280.00
Time	[02/03/14] Erin Russell: Review Court's Memorandum Opinion and Order granting Motion for Sanctions.	400.00	0.4	160.00
Time	[02/03/14] Erin Russell: Telephone conference with J. Sweet and P. Godfread re: Court's Memorandum Opinion.	400.00	0.5	200.00
Time	[02/05/14] Erin Russell: Research case law re: itemization of damages for sanctions award.	400.00	2.1	840.00
Time	[02/06/14] Erin Russell: Draft Affidavit of Erin K. Russell in support of Defendants' Itemization of Attorney's Fees.	400.00	0.8	320.00
Time	[02/06/14] Erin Russell: Prepare itemized invoice to support Itemization of Attorney's Fees re: sanctions order.	400.00	2.7	1,080.00
Time	[03/05/14] Erin Russell: Review Judge Darrah's Order granting Motion to Dismiss Amended Counterclaims.	400.00	0.2	80.00
Time	[03/05/14] Erin Russell: Telephone conference with Jason Sweet re: Judge Darrah's ruling.	400.00	0.8	320.00
Time	[04/02/14] Erin Russell: Draft and edit Defendants' Second Amended Counterclaims.	400.00	3.1	1,240.00
Time	[04/03/14] Erin Russell: Draft and edit Defendants' Second Amended Counterclaims.	400.00	2.7	1,080.00
Time	[04/04/14] Erin Russell: File Defendants' Second Amended Counterclaims.	400.00	0.3	120.00
Time	[05/08/14] Erin Russell: Travel to federal courthouse.	400.00	0.7	280.00
Time	[05/08/14] Erin Russell: Attend status conference before Judge Darrah.	400.00	1.6	640.00
Time	[05/08/14] Erin Russell: Telephone conference with Jason Sweet and Paul Godfread re: status conference.	400.00	0.4	160.00
Time	[08/25/14] Erin Russell: Draft Motion for Default and Notice of Motion.	400.00	2.3	920.00
Time	[08/25/14] Erin Russell: Travel to federal courthouse.	400.00	0.7	280.00
Time	[08/25/14] Erin Russell: Attend status conference before Judge Darrah.	400.00	1.7	680.00
Time	[08/25/14] Erin Russell: Telephone conference	400.00	0.3	120.00

with Jason Sweet re: status conference.

Time	[08/26/14] Erin Russell: File Motion for Default.	400.00	0.3	120.00
Time	[09/04/14] Erin Russell: Review minute entry by Judge Darrah.	400.00	0.2	80.00
Time	[09/10/14] Erin Russell: Research and draft Motion to Show Cause and Notice of Motion. Gather exhibits.	400.00	3.7	1,480.00
Time	[09/11/14] Erin Russell: Review Motion to Dismiss Second Amended Counterclaims filed by Duffy and Prenda.	400.00	0.4	160.00
Time	[09/11/14] Erin Russell: Telephone conference with Jason Sweet regarding Motion to Dismiss Second Amended Counterclaims.	400.00	0.9	360.00
Time	[09/18/14] Erin Russell: Travel to federal courthouse.	400.00	0.8	320.00
Time	[09/18/14] Erin Russell: Attend status conference before Judge Darrah.	400.00	1.6	640.00
Time	[09/18/14] Erin Russell: Telephone conference with Jason Sweet and Paul Godfread re: status conference.	400.00	0.3	120.00
Time	[10/15/14] Erin Russell: Research opposition to Motion to Dismiss Second Amended Counterclaims.	400.00	2	800.00
Time	[10/15/14] Erin Russell: Draft Brief in Opposition to Motion to Dismiss Second Amended Counterclaims.	400.00	3.2	1,280.00
Time	[10/17/14] Erin Russell: Review Response in Opposition to Motion for Contempt.	400.00	0.4	160.00
Time	[10/17/14] Erin Russell: Telephone conference with Jason Sweet re: opposition to contempt motion.	400.00	0.6	240.00
Time	[10/17/14] Erin Russell: Review, edit and file Brief in Opposition to Motion to Dismiss Second Amended Counterclaims.	400.00	1.1	440.00
Time	[10/28/14] Erin Russell: Review transcript from May 8, 2014.	400.00	0.2	80.00
Time	[10/28/14] Erin Russell: Review transcript from August 27, 2014.	400.00	0.2	80.00
Time	[11/06/14] Erin Russell: Travel to federal courthouse.	400.00	0.7	280.00
Time	[11/06/14] Erin Russell: Attend status hearing.	400.00	1.6	640.00
Time	[12/02/14] Erin Russell: Review response in opposition to joint and several liability motion.	400.00	0.3	120.00

Item	Description	Unit Cost	Quantity	Line Total
Expense	[Prenda v. Godfread, et al. 04/28/15] Taxi & Parking, ParkChicago: parking at federal court	24.50	1	24.50
Expense	[Prenda v. Godfread, et al. 02/12/15] Taxi & Parking, ParkChicago: parking at federal court	19.39	1	19.39
Expense	[Prenda v. Godfread, et al. 01/22/15] Taxi & Parking, ParkChicago: parking at federal court	13.00	1	13.00
Expense	[Prenda v. Godfread, et al. 01/22/15] Taxi & Parking, ParkChicago: parking at federal court	10.10	1	10.10
Expense	[Prenda v. Godfread, et al. 11/18/14] Taxi & Parking, ParkChicago: parking at federal court	10.10	1	10.10
Expense	[Prenda v. Godfread, et al. 08/27/14] Taxi & Parking, ParkChicago: parking at federal court	7.20	1	7.20
Expense	[Prenda v. Godfread, et al. 08/27/14] Taxi & Parking, ParkChicago: parking at federal court	12.42	1	12.42
Expense	[Prenda v. Godfread, et al. 08/20/13] Court Reporter, Mary M. Hacker: transcript of proceedings before Judge Darrah on June 25, 2013	24.20	1	24.20
Expense	[Prenda v. Godfread, et al. 08/14/13] Court Reporter, Mary M. Hacker: transcript of proceedings before Judge Darrah on August 14, 2013	58.00	1	58.00
Expense	[Prenda v. Godfread, et al. 05/31/13] Legal Fees, Laura Beasley: Local counsel fees incurred investigating circumstances of the filing of the St. Clair County amended complaint and obtaining the affidavit of Circuit Court Clerk's Office employee Judy Kent.	738.00	1	738.00
Expense	[Prenda v. Godfread, et al. 04/30/13] Legal Fees, Laura Beasley: Local counsel fees incurred investigating alleged St. Clair County amended complaint.	234.00	1	234.00
Total				51,870.91
Amount Paid				0.00
Balance Due (USD)				\$51,870.91