

PORZIO

Bromberg & Newman

100 SOUTHGATE PARKWAY, PO BOX 1997
MORRISTOWN, NJ 07962-1997
TEL (973) 538-4006
FAX (973) 538-5146
TAX ID: 22-2005150

Laura Allen, CPA
Business Administrator
Monroe Township School District
423 Buckelew Avenue
Monroe Township, NJ 08831

January 26, 2023

Invoice #3292787

Re: *Special Counsel*
Our Matter # 022960.016304
Billing Attorney: Vito A. Gagliardi

REMITTANCE PAGE

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

Professional Services	7,361.00
Disbursements	0.00
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$7,361.00

Previous Balance Due	7,478.66
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0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$7,361.00	\$7,478.66	\$0.00	\$0.00	\$0.00	\$0.00	\$14,839.66

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$14,839.66

CHECKS	ACH WIRES:	CREDIT CARDS & ELECTRONIC CHECKS
Please remit payments to: PO Box 1997 100 Southgate Parkway Morristown, NJ 07962	M&T Bank 465 Main St., Lafayette Court, Buffalo, NY 14203 ABA: 022000046 Account No. 9864064457 Swift Code: MANTUS33	www.pbnlaw.com Scroll to the page bottom and click Porzio Invoice Payment

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Laura Allen, CPA
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Monroe Township School District
423 Buckelew Avenue
Monroe Township, NJ 08831

January 26, 2023

Invoice # 3292787

Re: *Special Counsel*
Our Matter # 022960.016304
Billing Attorney: Vito A. Gagliardi

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/01/22	VAG	Confer with DCH regarding referendum; prepare e-mail to C. Chanley and G. Tague.	0.5	105.00
12/01/22	DCH	Review materials, research, and call with VAG. Follow up.	1.2	252.00
12/01/22	MLF	Review and respond to correspondence from OAL regarding [REDACTED] matter and draft correspondence to M. Pattantite regarding same.	0.3	63.00
12/01/22	DLD	Phone call with L.Goldstein regarding OPRA requests.	0.6	126.00
12/02/22	VAG	Exchange e-mails with C. Chanley; review and revise draft response to auditor's letter.	0.4	84.00
12/02/22	DLD	Draft correspondence to C.Chanley and G.Tague regarding special election; review statutory and regulatory guidance regarding same; draft correspondence to K.Christine providing our office's opinion regarding worker's compensation.	1.0	210.00
12/02/22	BG	Draft response to K. Christie regarding application of worker's compensation to district employee.	1.0	210.00
12/05/22	MLF	Telephone conference with M. Ruela regarding [REDACTED], [REDACTED] and [REDACTED] matters. Telephone conference with M. Ruela regarding parent transportation matter and draft correspondence to her regarding same.	2.0	420.00
12/06/22	MLF	Review and respond to inquiry regarding transgender students.	1.5	315.00
12/06/22	DLD	Review recent OPRA request; review statutory and regulatory guidance regarding same; phone call with L.Goldstein regarding same.	0.5	105.00
12/06/22	RJS	Revise and finalize response to auditors' request; prepare agreement documents for review by BG.	0.8	116.00
12/07/22	MLF	Review correspondence from M. Pattanite regarding [REDACTED] matter.	0.2	42.00
12/08/22	VAG	Telephone conference with C. Lieber at NJSIG.	0.2	42.00
12/08/22	MLF	Review Board minutes regarding [REDACTED] matter.	0.2	42.00

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/09/22	MLF	Telephone conference with M. Ruela regarding [REDACTED], [REDACTED] and [REDACTED] matters. Draft correspondence to A. Meltzer regarding [REDACTED] records.	0.8	168.00
12/11/22	VAG	Exchange e-mails with L. Allen.	0.2	42.00
12/12/22	RHB	Review and analysis of email and Sidebar Agreement from K. Christie; preparation of Amended and Restated Sidebar Agreement; preparation of email to K. Christie regarding [REDACTED]	2.2	462.00
12/12/22	DLD	Review recent OPRA requests; determine District's response to same; phone call with L.Goldstein regarding various OPRA requests; phone call with R.Zielinski regarding personnel matter.	1.0	210.00
12/13/22	VAG	Telephone conference with C. Chanley; exchange e-mails with C. Chanley.	0.5	105.00
12/13/22	DLD	Phone call with L.Goldstein regarding OPRA request; review responsive records regarding same; draft correspondence for the business office's use regarding same; draft correspondence to L.Goldstein providing our office's recommendation regarding same.	1.0	210.00
12/14/22	VAG	Exchange e-mails with C. Skurbe; to Monroe Twp., attend Board meeting.	5.2	1,092.00
12/14/22	RHB	Telephone conference with R. Schwartz regarding vacation accrual and use issue with administrators.	0.3	63.00
12/14/22	DCH	Calls and emails regarding facilities review by NJDOE.	0.4	84.00
12/14/22	DLD	Phone call with G.Teague regarding special election and middle school project; draft resolution for the District's use regarding same; draft correspondence to G.Teague providing our office's opinion outline same; review recent OPRA request; determine District's legal responsibilities in response to same; draft correspondence to L.Goldstein providing our office's opinion to same.	1.1	231.00
12/15/22	DLD	Phone call with A.Layman regarding student college application issue; review relevant documentation regarding same; phone call with Debra Kradjian Stephans regarding same; draft agreement for the District's use regarding same; phone call with L.Goldberg to discuss various OPRA requests; phone call with C.Chanley regarding personnel and student matter; exchange correspondence with C.Chanley regarding same.	3.8	798.00
12/19/22	MLF	Review and respond to correspondence from A. Meltzer regarding request for student records, review records and draft correspondence to Mr. Meltzer regarding same.	0.4	84.00
12/19/22	DLD	Review potentially responsive records to OPRA request; provide our recommendations regarding same; phone call with E.Cridge regarding personnel matter; phone call with L.Goldstein regarding recent OPRA request; draft correspondence to C.Chanley regarding personnel matter.	3.7	777.00
12/20/22	VAG	Exchange e-mails with C. Chanley; review SEC decision, exchange e-mails with D. Rubin regarding same.	0.5	105.00
12/20/22	MLF	Review and respond to correspondence from M. Ruela regarding [REDACTED] matter.	0.2	42.00
12/20/22	DLD	Exchange correspondence with D.Stephans regarding student issue; exchange correspondence with A.Layman regarding same; provide recommended revisions to potentially responsive records regarding recent OPRA request; draft correspondence to L.Goldstein providing our office's opinion to same.	0.7	147.00
12/21/22	MLF	Telephone conference with J. Burke regarding [REDACTED] draft proposed statement for potential schools and correspondence to M. Ruela regarding same.	1.0	210.00
12/21/22	DLD	Phone call with L.Goldstein regarding recent OPRA requests.	0.3	63.00
12/22/22	RHB	Review and analysis of email string; telephone conference with C. Chanley; preparation of email to C. Chanley regarding [REDACTED] matter.	0.5	105.00

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/22/22	DLD	Review potentially responsive records regarding OPRA request; draft correspondence to L.Goldstein providing our office's recommendation regarding same.	0.7	147.00
12/23/22	VAG	Exchange e-mails with C. Chanley.	0.2	42.00
12/24/22	DLD	Finalize agreement with parent; draft correspondence to D.Stephens regarding same.	0.2	42.00
TOTAL FEES			35.3	\$7,361.00

TOTALS FOR THIS MATTER

Professional Services	7,361.00
Disbursements	0.00
Total Professional Services & Disbursements	7,361.00

BALANCE DUE THIS INVOICE	\$ 7,361.00
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Previous Balance Due	7,478.66
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	\$ 14,839.66
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FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Bauch, Richard H	Of Counsel 2	3.0	210.00	630.00
Disler, David L	Counsel	14.6	210.00	3,066.00
Fabian, Marie-Laurence	Of Counsel 3	6.6	210.00	1,386.00
Gagliardi, Vito A	Principal	7.7	210.00	1,617.00
Giardina, Brian	Associate	1.0	210.00	210.00
Hespe, David C	Of Counsel 2	1.6	210.00	336.00
Sisco, Rodger J	Paralegal	0.8	145.00	116.00
		TOTAL FEES	35.3	\$7,361.00

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
12/13/22	3291193	7,478.66	7,478.66
CURRENT BALANCE DUE		\$7,478.66	\$7,478.66

January 26, 2023

Laura Allen, CPA
Business Administrator
Monroe Township School District
423 Buckelew Avenue
Monroe Township, NJ 08831

Invoice #3292791

Re: *Labor Negotiations*
Our Matter # 022960.093446
Billing Attorney: Vito A. Gagliardi

REMITTANCE PAGE

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

Professional Services	5,817.00
Disbursements	4.83
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$5,821.83

Previous Balance Due 7,623.00

0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$5,821.83	\$7,623.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13,444.83

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$13,444.83

CHECKS	ACH WIRES:	CREDIT CARDS & ELECTRONIC CHECKS
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Laura Allen, CPA
Business Administrator
Monroe Township School District
423 Buckelew Avenue
Monroe Township, NJ 08831

January 26, 2023

Invoice # 3292791

Re: *Labor Negotiations*
Our Matter # 022960.093446
Billing Attorney: Vito A. Gagliardi

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/05/22	RHB	Commence preparation of memorandum of agreement regarding MTSSA negotiations.	1.4	294.00
12/06/22	RHB	Review and respond to email from A. Layman regarding preparation for MTEA negotiations.	0.2	42.00
12/06/22	BG	Review proposed evaluation clauses, evaluate [REDACTED];	0.4	84.00
12/08/22	RHB	Preparation of Memorandum of Agreement regarding MTSSA Negotiations settlement for successor collective negotiations agreement.	3.2	672.00
12/09/22	RHB	Review and respond to email from C. Skurbe; review and analysis of email from Dr. Jim Higgins; review of CNA; revise MOA to respond to Dr. Higgins' concerns; preparation of email to Dr. Higgins explaining revisions to Version 2 of MOA; preparation of text message to C. Skurbe regarding MTSSA negotiations and [REDACTED]	2.2	462.00
12/09/22	RHB	Preparation for Zoom conference; attend Zoom conference with K. MacDonald, C. Chanley, A. Layton, L. Allen, and K. Christie; review and respond to email from K. Christie; drafting of Additional Proposal regarding Article 24 - DRIVERS (MTEA Negotiations).	3.4	714.00
12/09/22	BG	Begin drafting memo regarding [REDACTED]; Research administrative applicable decisions	3.9	819.00
12/11/22	RHB	Review and respond to email from Dr. Higgins; review and analysis of annotated draft prepared by MTSSA; legal research; draft detailed response to Dr. Higgins regarding MTSSA Negotiations.	2.4	504.00
12/12/22	RHB	Review and respond to correspondence from C. Skurbe; confer with B. Giardina; review and analysis of email from C. Skurbe regarding MTEA negotiations.	0.6	126.00

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/12/22	RHB	Review and respond to email and proposal from Dr. Higgins; telephone conference with Dr. Higgins; preparation of correspondence to C. Skurbe; review and analysis of responsive correspondence from C. Skurbe; follow-up telephone conference with Dr. Higgins; preparation of revised MOA; preparation of detailed email to Dr. Higgins; review and analysis of email from Dr. Higgins; review and respond to correspondence from C. Skurbe regarding [REDACTED]	2.4	504.00
12/12/22	BG	Continue drafting memo in support of Board's counter-proposal and evaluation of [REDACTED]	0.5	105.00
12/13/22	RHB	Review and respond to text from C. Skurbe; review and respond to email from Dr. Higgins regarding MTSSA negotiations.	0.2	42.00
12/13/22	BG	Continue drafting memo on [REDACTED] including [REDACTED] and [REDACTED]	0.8	168.00
12/14/22	RHB	Review and respond to text from C. Skurbe; review and respond to email from C. Skurbe; confer with VAG regarding [REDACTED]	0.4	84.00
12/14/22	BG	Continue drafting memo regarding [REDACTED]	2.9	609.00
12/29/22	BG	Continue drafting memorandum on [REDACTED] including [REDACTED]	2.8	588.00
TOTAL FEES			27.7	\$5,817.00

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
12/27/22	Telephone - Conference Call November 2022	4.83
TOTAL DISBURSEMENTS		\$4.83

TOTALS FOR THIS MATTER

Professional Services	5,817.00
Disbursements	4.83
Total Professional Services & Disbursements	5,821.83

BALANCE DUE THIS INVOICE	\$ 5,821.83
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Previous Balance Due	7,623.00
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	\$ 13,444.83
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FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Bauch, Richard H	Of Counsel 2	16.4	210.00	3,444.00
Giardina, Brian	Associate	11.3	210.00	2,373.00
		TOTAL FEES	27.7	\$5,817.00

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
12/13/22	3291196	7,623.00	7,623.00
CURRENT BALANCE DUE		\$7,623.00	\$7,623.00

January 26, 2023

Laura Allen, CPA
Business Administrator
Monroe Township School District
423 Buckelew Avenue
Monroe Township, NJ 08831

Invoice #3292789

Re: *Joan Bonnain v. Monroe Township School District, et al*
Our Matter # 022960.091040
Billing Attorney: Vito A. Gagliardi

REMITTANCE PAGE

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

Professional Services	9,041.00
Disbursements	0.00
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$9,041.00

Previous Balance Due 4,137.00

0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$9,041.00	\$4,137.00	\$0.00	\$0.00	\$0.00	\$0.00	\$13,178.00

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$13,178.00

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Laura Allen, CPA
Business Administrator
Monroe Township School District
423 Buckelew Avenue
Monroe Township, NJ 08831

January 26, 2023

Invoice # 3292789

Re: *Joan Bonnain v. Monroe Township School District, et al*
Our Matter # 022960.091040
Billing Attorney: Vito A. Gagliardi

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/01/22	WJK	Receipt/review of email correspondence from plaintiff's counsel regarding stipulation to extend discovery; begin drafting consent order to extend discovery; continue drafting mediation statement.	3.8	798.00
12/02/22	WJK	Continue drafting mediation statement.	8.6	1,806.00
12/02/22	RJS	Compile and prepare discovery-related documents and deficiency letters for review by VAG.	0.3	43.50
12/03/22	VAG	Review and revise draft of mediation statement.	0.5	105.00
12/05/22	WJK	Continue drafting mediation statement; review/analyze caselaw regarding [REDACTED] to draft additional argument in mediation statement; exchange email correspondence with A. Layman regarding upcoming mediation; finishing drafting consent order extending discovery; exchange email correspondence with plaintiff's counsel regarding consent order.	7.3	1,533.00
12/05/22	JAC	Finalize and serve mediation statement.	0.3	43.50
12/06/22	WJK	Exchange email correspondence with plaintiff's counsel regarding approved language consent order to extend discovery; exchange email correspondence to mediator regarding virtual appearance at upcoming mediation, start time; exchange email correspondence with plaintiff's counsel regarding applicable insurance.	0.8	168.00
12/07/22	VAG	Review file in preparation for mediation.	0.5	105.00
12/07/22	WJK	Draft outline of [REDACTED] in preparation for upcoming mediation.	1.6	336.00
12/07/22	JAC	Finalize and file consent order.	0.2	29.00
12/08/22	VAG	Court-ordered mediation session with parties, counsel and mediator R. Margulies.	1.2	252.00

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/08/22	WJK	Correspondence with plaintiff's counsel regarding today's mediation; appear for mediation; receipt/review of correspondence from plaintiff's counsel regarding discovery; review of executed order extending discovery from court with new discovery deadlines; correspondence with mediator regarding second round of mediation; perform online research as to [REDACTED]; draft status report to A. Layman regarding outcome of today's mediation session, second round of mediation, strategy for pursuing discovery and fact investigation.	9.8	2,058.00
12/09/22	WJK	Receipt/review of email from A. Layman regarding [REDACTED].	0.1	21.00
12/22/22	WJK	Receipt/review of email correspondence from plaintiff's counsel regarding document request.	0.1	21.00
12/27/22	WJK	Review/analyze plaintiff's 12/22/22 discovery amendment; review/analyze plaintiff's 12/22/22 deposition notice; revise deficiency letter to include additional discussion of deficiencies in discovery amendments, deposition notice.	3.4	714.00
12/28/22	WJK	Receipt/review of email correspondence from plaintiff's counsel regarding supplemental discovery; draft email correspondence to A. Layman regarding [REDACTED]	0.4	84.00
12/29/22	WJK	Perform online research as to [REDACTED] review [REDACTED] regarding same and potential future discovery needed.	4.4	924.00
TOTAL FEES			43.3	\$9,041.00

TOTALS FOR THIS MATTER

Professional Services	9,041.00
Disbursements	0.00
Total Professional Services & Disbursements	9,041.00

BALANCE DUE THIS INVOICE	\$ 9,041.00
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Previous Balance Due	4,137.00
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	\$ 13,178.00
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FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Ciaburri, Jennifer A	Paralegal	0.5	145.00	72.50
Gagliardi, Vito A	Principal	2.2	210.00	462.00
Kulick, Weston J	Associate	40.3	210.00	8,463.00
Sisco, Rodger J	Paralegal	0.3	145.00	43.50
		TOTAL FEES	43.3	\$9,041.00

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
12/13/22	3291195	4,137.00	4,137.00
	CURRENT BALANCE DUE	\$4,137.00	\$4,137.00

January 26, 2023

Laura Allen, CPA
Business Administrator
Monroe Township School District
423 Buckelew Avenue
Monroe Township, NJ 08831

Invoice #3292788

Re: *Pauline Goddard-Post v. Monroe Township School District, et al.*
Our Matter # 022960.091039
Billing Attorney: Vito A. Gagliardi

REMITTANCE PAGE

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

Professional Services	2,738.00
Disbursements	0.00
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$2,738.00

Previous Balance Due 2,709.00

0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$2,738.00	\$2,709.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,447.00

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$5,447.00

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423 Buckelew Avenue
Monroe Township, NJ 08831

January 26, 2023

Invoice # 3292788

Re: *Pauline Goddard-Post v. Monroe Township School District, et al.*
Our Matter # 022960.091039
Billing Attorney: Vito A. Gagliardi

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
12/01/22	WJK	Exchange series of correspondence with A. Layman regarding [REDACTED]	1.3	273.00
12/02/22	WJK	Review/analyze recent caselaw regarding [REDACTED] to continue drafting discovery deficiency letter; continue drafting discovery deficiency letter.	3.4	714.00
12/05/22	WJK	Receipt/review of email correspondence from A. Layman regarding [REDACTED]	0.1	21.00
12/06/22	WJK	Draft consent order to extend discovery; correspondence with plaintiff's counsel regarding proposed consent order to extend discovery, approval of draft language and submission to court; begin drafting mediation statement.	4.6	966.00
12/07/22	VAG	Review and revise draft letter regarding deficiencies in Plaintiff's discovery responses.	0.3	63.00
12/07/22	JAC	Finalize and file consent order.	0.2	29.00
12/08/22	WJK	Correspondence with mediator regarding delaying upcoming mediation in light of developments in the J. Bonnain matter.	0.4	84.00
12/09/22	WJK	Review correspondence from Court regarding executed consent order; review order setting new discovery control dates.	0.2	42.00
12/28/22	WJK	Review/analyze plaintiff's 12/23/22 discovery amendment; review/analyze plaintiff's 12/23/22 deposition notice; revise deficiency letter to include additional discussion of deficiencies in discovery amendments and deposition notice.	2.6	546.00
TOTAL FEES			13.1	\$2,738.00

TOTALS FOR THIS MATTER

Professional Services	2,738.00
Disbursements	0.00
Total Professional Services & Disbursements	<u>2,738.00</u>

BALANCE DUE THIS INVOICE	\$ 2,738.00
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Previous Balance Due	2,709.00
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	<u>\$ 5,447.00</u>
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FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Ciaburri, Jennifer A	Paralegal	0.2	145.00	29.00
Gagliardi, Vito A	Principal	0.3	210.00	63.00
Kulick, Weston J	Associate	12.6	210.00	2,646.00
		TOTAL FEES	13.1	\$2,738.00

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
12/13/22	3291194	2,709.00	2,709.00
CURRENT BALANCE DUE		\$2,709.00	\$2,709.00