

December 15, 2022

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

Invoice #3291193

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

REMITTANCE PAGE

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/22

Professional Services	7,475.50
Disbursements	
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$7,478.66

Previous Balance Due	7,836.67
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0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$7,478.66	\$7,836.67	\$0.00	\$0.00	\$0.00	\$0.00	\$15,315.33

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$15,315.33

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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December 15, 2022

Invoice # 3291193

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

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

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
11/01/22	MLF	Review and respond to inquiry about [REDACTED] meeting.	0.2	42.00
11/03/22	DLD	Review bid specifications for Ground Care Maintenance; draft correspondence to G. Tague providing opinion regarding same; phone call with L. Goldstein regarding OPRA; review requests regarding same; exchange correspondence with L. Goldstein regarding same.	1.1	231.00
11/04/22	DLD	Exchange correspondence with L. Goldstein providing our office's opinion regarding OPRA requests; review proposed responses and provide our office's recommendations regarding same.	0.5	105.00
11/07/22	MLF	Finalize [REDACTED] chrono and draft correspondence to B. Gamble regarding current status. Review student records in [REDACTED] matter.	2.5	525.00
11/07/22	RJS	Prepare electronic sets of records received from client for review by MLF, and organize same.	0.4	58.00
11/08/22	MLF	Telephone conference with Mr. Rubella regarding [REDACTED] student records and status of [REDACTED] matter. Review and respond to correspondence from B. Gamble regarding [REDACTED] matter.	1.0	210.00
11/09/22	MLF	Review and respond to correspondence from B. Gamble regarding status of [REDACTED] matter.	0.2	42.00
11/14/22	VAG	Exchange e-mails with C. Skurbe.	0.2	42.00
11/14/22	DLD	Review recent OPRA request; determine District's legal requirements regarding same; exchange correspondence with L. Goldstein regarding same; phone call with L. Goldstein regarding same.	0.4	84.00
11/15/22	VAG	Telephone conference with C. Skurbe and K. Bierman.	0.5	105.00
11/15/22	RHB	Review and analysis of email from C. Skurbe; prepare revised ethics complaint; preparation of email to C. Skurbe regarding [REDACTED]	2.6	546.00
11/15/22	MLF	Telephone conference with M. Ruela regarding [REDACTED] and review correspondence from her regarding same.	0.8	168.00

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
11/16/22	VAG	To Monroe Twp., attend Board meeting.	4.5	945.00
11/16/22	MLF	Review settlement agreement and spreadsheets regarding [REDACTED] and participate in meeting with M. Ruela , L. Allen, L. Pecorino, parent and attorney for parent. Review correspondence regarding prior issue brought up by parent at [REDACTED] meeting. Update chrono and review and respond to correspondence from M. Pattanite regarding [REDACTED] matter.	3.0	630.00
11/16/22	DLD	Review recent OPRA request; review potentially responsive records regarding same; exchange correspondence with L.Goldstein providing our office's opinion regarding same.	0.3	63.00
11/16/22	RJS	Draft response to auditors' request.	0.4	58.00
11/17/22	RHB	Review and respond to email from D. Rubin regarding ethics complaint.	0.2	42.00
11/17/22	MLF	Review and respond to correspondence from M. Pattanite regarding [REDACTED] and telephone conference with him regarding same.	2.0	420.00
11/17/22	DLD	Review Agreement with North Brunswick Township Aquatics Pool; provide our recommendations regarding same; draft correspondence to N.Tagliaferro regarding same	1.5	315.00
11/18/22	MLF	Review and return substitution attorney and draft correspondence to M. Pattanite with various requested documents.	1.0	210.00
11/21/22	RHB	Review and analysis of email from A. Layman; review and analysis of contract language; extended telephone conference with A. Layman and C. Chanley regarding [REDACTED]	2.4	504.00
11/21/22	DLD	Review recent OPRA request; determine District's legal responsibilities regarding same; exchange correspondence with L.Goldstein regarding same.	0.7	147.00
11/23/22	RHB	Review and analysis of email from DLD; review and analysis of legal invoice entries for OPRA privileges; preparation of responsive email to DLD regarding OPRA request.	0.6	126.00
11/23/22	DLD	Review responsive records to recent OPRA request; prepare recommendations regarding redactions regarding same.	1.0	210.00
11/27/22	VAG	Receive and review notice of tort claim, prepare email to L. Allen regarding same.	0.2	42.00
11/28/22	VAG	Exchange e-mails with K. Higgins; telephone conference with C. Chanley.	0.4	84.00
11/28/22	DLD	Remove and redact potentially responsive records regarding OPRA request; prepare response for the District's use regarding same; exchange correspondence with L.Goldstein regarding same; review inquiry from L.Goldstein regarding another OPRA request; review responsive record regarding same; exchange correspondence with L.Goldstein providing our office's opinion regarding same.	0.9	189.00
11/29/22	RHB	Review and analysis of email from K. Christie; review and analysis of drafts of agreement regarding Athletic Trainer.	0.5	105.00
11/29/22	WJK	Draft summaries of current status of 4 matters (J. Bonnain, P. Goddard-Post, and two L. Isaacs matters) in response to client audit request.	3.0	630.00
11/29/22	RJS	Revise response to auditors' request.	0.5	72.50
11/30/22	VAG	Telephone conference with C. Chanley.	0.5	105.00
11/30/22	DLD	Review statutory and regulatory guidance on worker's compensation regarding personnel issue; review statutory and regulatory guidance regarding referendum.	1.5	315.00

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
11/30/22	WJK	Review/analyze statutory authority (N.J.S.A. 19:60-2) and DOE guidance regarding [REDACTED] draft analysis of same to assist in making recommendation.	0.5	105.00
TOTAL FEES			36.0	\$7,475.50

DISBURSEMENTS

DATE	DESCRIPTION	AMOUNT
11/23/22	Telephone - Conference Call October 2022	3.16
TOTAL DISBURSEMENTS		\$3.16

TOTALS FOR THIS MATTER

Professional Services	7,475.50
Disbursements	3.16
Total Professional Services & Disbursements	7,478.66

BALANCE DUE THIS INVOICE	\$ 7,478.66
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Previous Balance Due	7,836.67
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	\$ 15,315.33
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FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Bauch, Richard H	Of Counsel 2	6.3	210.00	1,323.00
Disler, David L	Counsel	7.9	210.00	1,659.00
Fabian, Marie-Laurence	Of Counsel 3	10.7	210.00	2,247.00
Gagliardi, Vito A	Principal	6.3	210.00	1,323.00
Kulick, Weston J	Associate	3.5	210.00	735.00
Sisco, Rodger J	Paralegal	1.3	145.00	188.50
		TOTAL FEES	36.0	\$7,475.50

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
11/10/22	3289519	7,836.67	7,836.67
	CURRENT BALANCE DUE	\$7,836.67	\$7,836.67

December 15, 2022

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

Invoice #3291195

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 11/30/22

Professional Services	4,137.00
Disbursements	0.00
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$4,137.00
Previous Balance Due	2,394.00

0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$4,137.00	\$2,394.00	\$0.00	\$0.00	\$0.00	\$0.00	\$6,531.00

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$6,531.00

CHECKS	ACH WIRES:	CREDIT CARDS & ELECTRONIC CHECKS
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December 15, 2022

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

Invoice # 3291195

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 11/30/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
11/08/22	WJK	Amend draft responses to C interrogatories, C(2) interrogatories, plaintiff's supplemental interrogatories, and plaintiff's demand for discovery of insurance information to reflect student records request production.	3.6	756.00
11/09/22	WJK	Finish review of plaintiff's discovery responses produced; comparative analysis of [REDACTED]; begin drafting outline of plaintiff's discovery responses.	2.9	609.00
11/16/22	WJK	Review/analyze plaintiff's written discovery supplement; draft analysis of [REDACTED]	0.6	126.00
11/18/22	WJK	Draft outline of plaintiff's written discovery responses.	1.5	315.00
11/23/22	WJK	Begin drafting mediation statement.	3.3	693.00
11/25/22	WJK	Perform research [REDACTED] in order to continue drafting mediation statement.	2.4	504.00
11/28/22	WJK	preparation of exhibits to produce in connection with discovery responses.	0.9	189.00
11/29/22	WJK	Draft discovery deficiency letter to plaintiff regarding overdue discovery obligations and deficient interrogatory responses in light of specific requests propounded.	2.6	546.00
11/30/22	WJK	Draft status report to client regarding [REDACTED]; exchange email correspondence with plaintiff's counsel regarding consent to extend discovery.	1.9	399.00
TOTAL FEES			19.7	\$4,137.00

TOTALS FOR THIS MATTER

Professional Services	4,137.00
Disbursements	0.00
Total Professional Services & Disbursements	4,137.00

BALANCE DUE THIS INVOICE

\$ 4,137.00

Previous Balance Due

2,394.00

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$ 6,531.00

FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Kulick, Weston J	Associate	19.7	210.00	4,137.00
TOTAL FEES		19.7		\$4,137.00

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
11/10/22	3289521	2,394.00	2,394.00
	CURRENT BALANCE DUE	\$2,394.00	\$2,394.00

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

December 15, 2022

Invoice #3291194

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 11/30/22

Professional Services	2,709.00
Disbursements	0.00
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$2,709.00

Previous Balance Due	1,631.50
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0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$2,709.00	\$1,631.50	\$0.00	\$0.00	\$0.00	\$0.00	\$4,340.50

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$4,340.50

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December 15, 2022

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

Invoice # 3291194

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 11/30/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
11/18/22	WJK	Review/analyze plaintiff's responses to first set of interrogatories; determine nature of responses and identify deficiencies; begin drafting outline of plaintiff's discovery responses.	2.7	567.00
11/21/22	WJK	Draft outline of plaintiff's written discovery responses.	2.3	483.00
11/30/22	WJK	Draft status report to client regarding [REDACTED] begin drafting discovery deficiency letter to plaintiff's counsel outlining nonconforming responses to various interrogatories; exchange email correspondence with plaintiff's counsel regarding consent order to extend discovery.	7.9	1,659.00
TOTAL FEES			12.9	\$2,709.00

TOTALS FOR THIS MATTER

Professional Services	2,709.00
Disbursements	0.00
Total Professional Services & Disbursements	2,709.00

BALANCE DUE THIS INVOICE **\$ 2,709.00**

Previous Balance Due 1,631.50

TOTAL AMOUNT DUE INCLUDING THIS INVOICE **\$ 4,340.50**

FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Kulick, Weston J	Associate	12.9	210.00	2,709.00
		TOTAL FEES	12.9	\$2,709.00

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
11/10/22	3289520	1,631.50	1,631.50
CURRENT BALANCE DUE		\$1,631.50	\$1,631.50

December 15, 2022

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

Invoice #3291196

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

REMITTANCE PAGE

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/22

Professional Services	7,623.00
Disbursements	0.00
TOTAL PROFESSIONAL SERVICES & DISBURSEMENTS	\$7,623.00
Previous Balance Due	3,003.00

0-30 Days	31-60 Days	61-90 Days	91-120 Days	121-180 Days	>180 Days	Total
\$7,623.00	\$3,003.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10,626.00

TOTAL AMOUNT DUE INCLUDING THIS INVOICE

\$10,626.00

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

December 15, 2022

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

Invoice # 3291196

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

STATEMENT OF PROFESSIONAL SERVICES RENDERED THROUGH 11/30/22

DATE	TKPR	DESCRIPTION	HOURS	AMOUNT
11/21/22	RHB	Preparation of Board proposals regarding MTEA negotiations.	3.2	672.00
11/22/22	RHB	Continued preparation of Board proposals; participate in extended zoom conference with Board negotiations committee regarding MTEA negotiations.	4.8	1,008.00
11/23/22	RHB	Preparation of email to C. Garrick; review and respond to email from C. Garrick; review and analysis of [REDACTED]; preparation of detailed email to Board negotiations committee regarding [REDACTED]	2.7	567.00
11/28/22	RHB	Preparation of revised Board Proposals; preparation of revised ground rules; preparation of email to client regarding MTEA negotiations; preparation of Board counterproposals regarding MTSSA negotiations; preparation of email to client regarding MTEA negotiations.	3.2	672.00
11/29/22	RHB	Continued preparation of initial Board proposals; preparation of email to A. Layton; review and respond to email from A. Layton; revise Board proposals; preparation of follow-up email to A. Layton; finalize initial Board proposals; preparation of revised agreed-upon Ground Rules; preparation of email to A. Layton and Board Negotiations Committee; attend second negotiations session.	9.8	2,058.00
11/29/22	BG	Legal research regarding [REDACTED]	1.3	273.00
11/30/22	RHB	Continued preparation of Board counterproposal; preparation of email to A. Layton; attend second negotiations session with MTSSA and negotiate complete settlement for successor collective negotiations agreement.	11.3	2,373.00
TOTAL FEES			36.3	\$7,623.00

TOTALS FOR THIS MATTER

Professional Services	7,623.00
Disbursements	0.00
Total Professional Services & Disbursements	7,623.00

BALANCE DUE THIS INVOICE

\$ 7,623.00

Previous Balance Due	3,003.00
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TOTAL AMOUNT DUE INCLUDING THIS INVOICE	<u>\$ 10,626.00</u>
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FEE SUMMARY

TIMEKEEPER	TITLE	HOURS	RATE	VALUE
Bauch, Richard H	Of Counsel 2	35.0	210.00	7,350.00
Giardina, Brian	Associate	1.3	210.00	273.00
		TOTAL FEES	36.3	\$7,623.00

ACCOUNTS RECEIVABLE

INVOICE DATE	INVOICE NUMBER	INVOICE TOTAL	OUTSTANDING BALANCE
11/10/22	3289522	3,003.00	3,003.00
CURRENT BALANCE DUE		\$3,003.00	\$3,003.00