

October 22, 2020
Invoice No.: 427198-01

Client Matter: 1815.180

RE: Conforti v. Covello, et al

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
8/24/20	JB	Review and reply to email from AJG regarding new matter and review complaint.	.50	100.00
8/25/20	JB	(Mercer Clerk) Review emails and documents sent by AJG for new complaint and call with him, including complaint and previous case from Middlesex with same attorneys and theme; telephone conference with CZ and AJG to discuss new matter and first steps on research.	1.30	260.00
8/25/20	CZ	Review complaint, amended complaint, plaintiff's brief in support of order to show cause, and background documents and information.	1.40	280.00
8/25/20	CZ	Conference call with AJG and JB regarding election issues, answer to complaint, and background on matter.	.40	80.00
8/26/20	JB	Continued review of documents sent by AJG for complaint.	.80	160.00
8/27/20	CZ	Conduct research on similar and analogous litigations from other jurisdiction in preparation for filing answer to complaint.	.60	120.00
8/28/20	CZ	Conduct research on similar and analogous litigations from other jurisdiction in preparation for filing answer to complaint.	.80	160.00
9/03/20	JB	Review email from AJG regarding status of research and review reply from CZ; review and reply to email from AJG regarding deadline for answer; review rule to determine due date for Answer; prepare email to AJG and CZ with deadline; review replies.	.60	120.00
9/03/20	CZ	Review court docket for service of process.	.10	20.00
9/03/20	CZ	Review letter from opposing counsel, B. Pugach, Esq., to court regarding complaint.	.10	20.00
9/10/20	CZ	Review email from co-counsel, P. Adezio, Esq., regarding upcoming Freeholder meeting.	.10	20.00

October 22, 2020
 Invoice No.: 427198-01

Date	Atty	Description Of Services Rendered	Hours	Amount
9/11/20	JB	Review emails with team regarding Judge Jacobson's decision in the gender ballot case and what it means for our case; review order from the court; review emails with AJG and GM regarding decision; review and analyze decision sent by AJG for input on our case.	1.20	240.00
9/11/20	CZ	Review court order and opinion in related matter (CJPD v. Flynn) for inclusion in responsive pleading.	.30	60.00
9/14/20	JB	Review email from AJG enclosing article on Judge Jacobson gender decision and review article.	.30	60.00
9/15/20	JB	Review CZ's email enclosing findings / memo from research on ballot cases; review cases; review reply from AJG regarding Mochary case; review email from CZ with summary of Mochary case and attaching same and discussing motion to dismiss; review replies; review email with CZ's findings on ballot placement and affect on votes; review reply from AJG regarding 1st amendment arguments.	1.20	240.00
9/15/20	CZ	Conduct research on recent case law and news for inclusion into responsive pleading.	1.80	360.00
9/15/20	CZ	Draft memorandum detailing research on caselaw pertinent to responsive pleading.	.40	80.00
9/15/20	CZ	Research statistics on whether ballot placement results in more favorable outcomes in elections for inclusion in responsive pleading to plaintiff's complaint.	.40	80.00
9/21/20	JB	Continued review of CZ's research memo and cases he sent me for our analysis of a motion to dismiss.	1.00	200.00
9/21/20	CZ	Conduct further research for studies regarding whether ballot position directly correlates to successful election.	.50	100.00
TOTAL PROFESSIONAL SERVICES				\$ 2,760.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jennifer Borek	200.00	6.90	1,380.00
Christopher Zamlout	200.00	6.90	1,380.00
TOTALS		13.80	\$ 2,760.00

GENOVA BURNS LLC

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TOTAL THIS MATTER

\$ 2,760.00

November 11, 2020
Invoice No.: 428164-01

Client Matter: 1815.180

RE: Conforti v. Covello, et al

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
10/07/20	JB	Review with AJG and CZ regarding status and memo on motion to dismiss; review email from CZ enclosing memo and review with CZ regarding discussing timing on answer / motion.	.40	80.00
10/07/20	CZ	Draft memorandum and outline detailing potential motion to dismiss plaintiff's complaint and arguments in support of same.	2.30	460.00
10/08/20	JB	Review and analyze CZ's memo on motion to dismiss and review cases cited by CZ; review with AJG regarding call with client; review emails with client regarding call to discuss motion to dismiss and any conversations with co-defendants' counsel; review and reply to emails with clients regarding scheduling a call; confirm court rule on 14 day extension and review with CZ regarding same.	1.60	320.00
10/08/20	CZ	Review emails from client, P. Sollami-Covello, and county counsel, P. Adezio, Esq., regarding responsive pleading to plaintiff's complaint, potential motion to dismiss, and overall strategy.	.20	40.00
10/12/20	JB	Review and analyze Bergen County's motion to intervene.	.40	80.00
10/13/20	AJG	Review outline in support of motion to dismiss	.20	40.00
10/13/20	JB	Review and reply to emails with AJG and CZ regarding extension of time to answer.	.30	60.00
10/14/20	AJG	Telephone call with Clerk Covello-Salami and P Adezio and JB and CZ re strategy and status	.60	120.00
10/14/20	JB	Prepare for call with clients by reviewing research from CZ; telephone conference with clients, AJG and CZ to discuss strategy and motion to dismiss; review email from P. Adezio with case he mentioned and review case; review email from CZ enclosing application for extension of time to file.	1.40	280.00
10/14/20	CZ	Conference call with AJG, JB, client, P. Sollami-Covello, and P. Adezio, Esq., regarding response to plaintiff's complaint, potential motion to dismiss, and overall strategy of matter.	.60	120.00

November 11, 2020
 Invoice No.: 428164-01

Date	Atty	Description Of Services Rendered	Hours	Amount
10/14/20	CZ	Draft application for extension of additional 14 days for time to file responsive pleading.	.20	40.00
10/14/20	CZ	Draft notices of appearance for AJG, JB and CZ.	.10	20.00
10/15/20	JB	Prepare notice of appearance and e-file same; revise and edit extension of time application and e-file same; review order from court entering extension of time to answer; review order from court extending time to answer for co-defendant; prepare email to clients enclosing order; review replies; review application for extension of time to answer filed by other co-defendant.	1.20	240.00
10/15/20	CZ	Review court notice and granted order requesting clerk's extension to file responsive pleading to plaintiff's complaint.	.10	20.00
10/16/20	JB	Review notice of appearance from E. Anderson; review application for extension of time to answer from co-defendant; review clerk's order granting extension.	.30	60.00
10/16/20	JB	Telephone conference with E. Andersen regarding his representation of co-defendant and strategy.	.20	40.00
10/16/20	CZ	Review co-defense counsel, E. Anderson, Esq., application to extend time to answer.	.10	20.00
10/20/20	JB	Review plaintiff's reply to Bergen County's motion to intervene.	.20	40.00
10/20/20	CZ	Review letter from opposing counsel, B. Pugach, Esq., in response to Bergen County Clerk's motion to intervene.	.10	20.00
10/20/20	CZ	Review email from county counsel, P. Adezio, Esq., regarding plaintiff's opposition to Bergen County motion to intervene.	.10	20.00
10/22/20	JB	Review e-filing from court granting Bergen County's motion to intervene.	.10	20.00
10/23/20	JB	Review email from AJG enclosing Trump v. Way decision for issue on standing in our case and review NJ Supreme Court decision; review email from AJG enclosing US Supreme Court decision on Andrew Goodman Foundation and briefly review decision.	.70	140.00
10/23/20	CZ	Review order granting motion to intervene.	.10	20.00

November 11, 2020
 Invoice No.: 428164-01

Date	Atty	Description Of Services Rendered	Hours	Amount
10/24/20	CZ	Draft brief in support of motion to dismiss plaintiff's complaint.	1.10	220.00
10/26/20	CZ	Draft brief in support of motion to dismiss plaintiff's complaint.	1.10	220.00
10/27/20	JB	Review with CZ regarding status of contacting co-defendants' counsel.	.10	20.00
10/28/20	JB	Review with AJG regarding extension of time to answer; prepare email to clients regarding extension; review reply; review with CZ regarding extension; prepare email to B. Pugach requesting consent for extension; review reply.	.50	100.00
10/28/20	CZ	Review court docket for notices of appearance filed by co-defendants.	.10	20.00
10/29/20	JB	Review with CZ regarding preparation of consent order; revise and edit consent order; telephone conference with E. Andersen regarding his answer for co-defendant (X3 vm's); prepare email to B. Pugach enclosing consent order.	.70	140.00
10/29/20	CZ	Draft consent order extending time to answer or respond to plaintiff's complaint.	.20	40.00
10/30/20	JB	Review email from B. Pugach regarding approval for consent order; finalize and e-file order; review order from court approving extension of time; telephone conference with E. Andersen regarding answer v. motion to dismiss; review co-defendant C Khatami's application for extension of time to answer; prepare email to clients regarding getting extension and my call with co-defendant; review reply from AJG regarding speaking to Bergen County's attorney.	.70	140.00

TOTAL PROFESSIONAL SERVICES**\$ 3,200.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Angelo J. Genova	200.00	.80	160.00
Jennifer Borek	200.00	8.80	1,760.00
Christopher Zamlout	200.00	6.40	1,280.00
TOTALS		16.00	\$ 3,200.00

GENOVA BURNS LLC

November 11, 2020
Invoice No.: 428164-01

DISBURSEMENTS

Description		Amount
9/20/20	WestLaw Research, Thomson Reuters - West Payment Center, 843150715	57.11
TOTAL DISBURSEMENTS		\$ 57.11
TOTAL THIS MATTER		\$ 3,257.11

December 4, 2020
 Invoice No.: 428718-01

Client Matter: 1815.180

RE: Conforti v. Covello, et al

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
11/06/20	JB	Review and analyze various cases and court decisions in preparation for filing motion to dismiss.	1.80	360.00
11/09/20	JB	Review with CZ regarding brief; review and analyze two of the key cases for brief as per CZ; review with AJG regarding call with all defense counsel.	1.20	240.00
11/09/20	CZ	Conduct research for case law in outside jurisdictions where ballot draw procedures were challenged and upheld for inclusion in draft motion to dismiss plaintiff's complaint.	1.20	240.00
11/10/20	JB	Prepare email to all defense counsel regarding call to discuss strategy; review with AJG regarding same; review replies; begin revise and edit of motion to dismiss brief and review with CZ regarding same.	1.00	200.00
11/10/20	CZ	Draft brief in support of motion to dismiss plaintiff's complaint.	3.60	720.00
11/10/20	CZ	Review emails from co-defense counsel, J. Placek, Esq., and C. Khatami, Esq., regarding coordinating efforts for responsive pleadings to plaintiff's complaint.	.10	20.00
11/11/20	JB	Review and reply to emails with counsel regarding call to discuss strategy; review with AJG and CZ regarding call and our brief; continued revise and edit motion to dismiss brief; review emails with AJG and CZ regarding authorities on ballot positioning and preferential treatment.	1.50	300.00
11/11/20	CZ	Review and revise brief in support of motion to dismiss plaintiff's complaint.	.50	100.00
11/11/20	CZ	Review emails from co-defense counsel, J. Placek, Esq., E. Anderson, Esq., and C. Khatami, Esq., regarding scheduling conference call to coordinate efforts for responsive pleadings to plaintiff's complaint.	.10	20.00
11/11/20	CZ	Conduct additional research and draft outline of similar challenges to Title 19 as plaintiff's complaint and articles/research advancing theories that ballot position leads to more favorable outcomes for inclusion in motion to dismiss brief, per AJG.	1.20	240.00

December 4, 2020
 Invoice No.: 428718-01

Date	Atty	Description Of Services Rendered	Hours	Amount
11/11/20	CZ	Conduct research and review additional cases filed outside of New Jersey regarding bracketing and ballot position in district court, per AJG, for inclusion in brief in support of motion to dismiss and anticipated oral argument on same; correspond with AJG and JB regarding additional research and case law.	1.50	300.00
11/12/20	AJG	Telephone conference with counsel for co parties, JB and CZ re strategy , motions to dismiss, legal theories, and extension of time to respond	1.00	200.00
11/12/20	JB	Review and analyze some of the cases / decisions sent by AJG and the treatise sent by CZ; telephone conference with C. Khatami regarding call; continued revise and edit motion to dismiss brief; review with AJG regarding call with counsel; prepare email to P. Adezio regarding call and review reply; telephone conference with all defense counsel to discuss strategy and coordinate motions to dismiss; telephone conference with B. Pugach regarding extension of time to answer; review with AJG regarding same; prepare email to B. Pugach regarding same and review and reply to replies.	4.50	900.00
11/12/20	CZ	Prepare for conference call with co-defense counsel regarding potential joint motion to dismiss; review case law and draft brief in support of motion.	.50	100.00
11/12/20	CZ	Conference call with AJG, JB and co-defense counsel, C. Khatami, Esq., E. Anderson, Esq., J. Placek, Esq., and R. Corbalan, Esq., regarding responsive pleading to plaintiff's complaint, arguments in favor of motion to dismiss same, and general strategy for litigation.	.60	120.00
11/12/20	CZ	Draft email to co-defense counsel, C. Khatami, Esq., E. Anderson, Esq., J. Placek, Esq., and R. Corbalan, Esq., regarding Rutgers Law Review article by B. Pugach, Esq., concerning advantages of county line.	.10	20.00
11/12/20	CZ	Review and respond to email from co-defense counsel, J. Placek, Esq., attaching pleadings in Singh v. Murphy (state and Warren County) for review and possible inclusion in motion to dismiss brief; review Sing briefs.	.40	80.00

December 4, 2020
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Date	Atty	Description Of Services Rendered	Hours	Amount
11/13/20	JB	Telephone conference with B. Pugach regarding extension of time to answer and call with AJG; prepare email to defense counsel regarding my call and consent order; prepare email to client regarding call with defense attorneys and plaintiff and new deadline; continued review of treatises AJG sent for motion to dismiss brief; prepare consent order extending time to answer; review and reply to email from C. Khatami regarding same; prepare email to all counsel sending proposed order; review replies.	2.30	460.00
11/13/20	CZ	Review emails from count counsel, P. Adezio, Esq., and co-defense counsel, C. Khatami, Esq., regarding extension of time to file responsive pleading.	.10	20.00
11/13/20	CZ	Review email from opposing counsel, B. Pugach, Esq., regarding consent order extending time to respond to Plaintiff's complaint; review consent order.	.10	20.00
11/16/20	JB	Review brief sent by AJG for standing argument; review replies on consent order; finalize and e-file consent order and send to client; review e-filing from court signing order granting extension of time; review order and send to clients.	1.00	200.00
11/16/20	CZ	Review standing arguments in briefs in support of motion to dismiss filed in various recent election challenges, per AJG, for inclusion of similar argument in motion to dismiss brief.	.60	120.00
11/16/20	CZ	Review filed and signed second consent order extending time to answer.	.10	20.00
11/19/20	JB	Continued review of relevant cases and treatises; revise and edit brief.	1.30	260.00
11/20/20	JB	Continued revise and edit motion to dismiss brief; continued review and analyze of pertinent case law.	2.30	460.00
11/23/20	JB	Review third circuit decision sent by AJG relevant to case.	.30	60.00
11/23/20	JB	Review with CZ regarding brief; continued review and revise of motion to dismiss brief and review of relevant resources.	2.00	400.00
11/24/20	JB	Review with CZ regarding summary / outline of cases that discuss factual issues related to primacy effect; continued review and revise brief.	1.20	240.00
11/25/20	JB	Review Bognet case sent by AJG and review with him regarding status of brief.	.50	100.00

December 4, 2020
Invoice No.: 428718-01

Date	Atty	Description Of Services Rendered	Hours	Amount
11/29/20	CZ	Review additional case law to be included in brief in support of motion to dismiss.	.40	80.00

TOTAL PROFESSIONAL SERVICES **\$ 6,600.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Angelo J. Genova	200.00	1.00	200.00
Jennifer Borek	200.00	20.90	4,180.00
Christopher Zamlout	200.00	11.10	2,220.00
TOTALS		33.00	\$ 6,600.00

DISBURSEMENTS

	Description	Amount
9/03/20	PACER SERVICE	.40
10/07/20	WestLaw Research, Thomson Reuters - West Payment Center, 843309701	54.34

TOTAL DISBURSEMENTS **\$ 54.74**

TOTAL THIS MATTER **\$ 6,654.74**

January 12, 2021
Invoice No.: 431157-01

Client Matter: 1815.180

RE: Conforti v. Covello, et al

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours	Amount
11/30/20	JB	Review Georgia and Texas authority sent by AJG and continued revisions to brief.	1.70	340.00
12/01/20	AJG	Review status of brief with CZ and JB	.20	40.00
12/01/20	JB	Review and reply to emails with AJG and CZ regarding status of brief; review treatise sent by AJG on subject; continued revise and edit brief; review with CZ regarding brief.	1.00	200.00
12/02/20	JB	Revise and edit statement of facts; review with CZ regarding extensive additional facts needed for brief; continued revisions to legal section; telephone conference with CZ regarding my comments and changes to be sent on rolling basis; review changes to first section as per my comments and incorporate in brief.	5.20	1,040.00
12/02/20	CZ	Call with JB regarding revisions to brief in support of motion to dismiss.	.10	20.00
12/02/20	CZ	Review and revise legal argument section of motion to dismiss brief, per edits from JB.	.30	60.00
12/03/20	JB	Review CZ's edits and responses to my queries on brief; continued revise and edit brief with CZ edits; prepare email to clients and AJG enclosing draft brief; review with AJG regarding his questions about GA and FL cases; briefly review cases.	4.00	800.00
12/03/20	CZ	Review and revise legal argument section of motion to dismiss brief, per edits from JB; conduct further research on case law and include same in draft.	2.30	460.00
12/04/20	JB	Review with AJG regarding brief; review email from client with comments on brief; review with CZ regarding status of brief; review cases from AJG for inclusion is applicable; review email from CZ with latest draft of facts; begin revise and edit facts; review with CZ regarding additional changes needed and additions to facts; review with CZ regarding statutes being challenged and review and analyze statutes again for more direct inclusion in facts.	3.80	760.00

January 12, 2021
 Invoice No.: 431157-01

Date	Atty	Description Of Services Rendered	Hours	Amount
12/04/20	CZ	Review emails from clients, P. Adezio, Esq., and P. Sollami-Covello, regarding review of brief in support of motion to dismiss plaintiff's complaint.	.20	40.00
12/04/20	CZ	Review and revise statement of facts section of motion to dismiss brief, per edits from JB	1.30	260.00
12/05/20	JB	Review with CZ regarding brief; continued review of relevant cases cited by AJG; continued revise and edit of brief.	2.40	480.00
12/06/20	JB	Review with CZ regarding revised facts; revise and edit in detail facts for motion to dismiss as prepared by CZ; review various election law articles for additional facts; prepare email to AJG enclosing revised brief.	6.80	1,360.00
12/06/20	CZ	Review and revise motion to dismiss brief, per edits from JB	1.40	280.00
12/07/20	AJG	Review and edit brief in support of Motion to Dimiss; provide comment	2.00	400.00
12/07/20	JB	Continued revise and finalize brief; review with CZ regarding various follow up legal research questions and incorporate into brief; revise and edit notice of motion and proposed order; review with AJG regarding brief; prepare email to clients forwarding latest version of brief; review replies; review with AJG regarding his comments on brief; finalize and e-file brief; prepare email to clients forwarding filed papers; review e-filings enclosing co-defendants' filings.	7.80	1,560.00
12/07/20	CZ	Revise and finalize motion to dismiss brief.	.70	140.00
12/07/20	CZ	Draft notice of motion to dismiss, certification of JB in support of same, and proposed order.	.50	100.00
12/07/20	CZ	Review court notice regarding motion to dismiss filed by co-defense counsel, E. Anderson, Esq., on behalf of co-defendant, C. G. Hanlon; review brief and exhibits.	.30	60.00
12/08/20	JB	Review and analyze both co-defendants' motions to dismiss pleadings, including certifications and briefs for both.	2.30	460.00
12/08/20	JB	Review email from client regarding filed brief; review e-filing from court setting deadlines for motion; review email from co-defendant regarding motions.	.30	60.00

January 12, 2021
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Date	Atty	Description Of Services Rendered	Hours	Amount
12/08/20	CZ	Review court notice regarding motion to dismiss filed by co-defense counsel, C. Khatami, Esq., on behalf of co-defendant, S. M. Colabella; review brief and exhibits.	.30	60.00
12/08/20	CZ	Draft email to opposing counsel, Y. Bromberg, Esq., and B. Pugach, Esq., providing courtesy copies of filed motion to dismiss.	.10	20.00
12/18/20	AJG	Review request for extension to file reply	.10	20.00
12/18/20	JB	Review e-filing enclosing plaintiff's automatic extension for motion pleading and review; review email from B. Pugach enclosing same.	.20	40.00
12/21/20	JB	Review e-filing resetting deadlines for motion to dismiss.	.10	20.00
12/21/20	CZ	Review court notice regarding letter filed by opposing counsel, B. Pugach, Esq., requesting automatic extension of the return date of motion to dismiss; review letter; review email from opposing counsel regarding same.	.30	60.00
12/21/20	CZ	Review court notice resetting deadlines as to motion to dismiss based on letter from opposing counsel, B. Pugach, Esq., requesting same.	.10	20.00
12/22/20	CZ	Review letter from opposing counsel, B. Pugach, Esq., to court requesting automatic extension of time to file opposition to motion to dismiss and briefing schedule for same.	.10	20.00
12/30/20	JB	Telephone conference with B. Pugach regarding plaintiff going to amend complaint and consent order for that a new briefing schedule; review with AJG regarding my call and thoughts on whether to consent.	.60	120.00

TOTAL PROFESSIONAL SERVICES**\$ 9,300.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Angelo J. Genova	200.00	2.30	460.00
Jennifer Borek	200.00	36.20	7,240.00
Christopher Zamlout	200.00	8.00	1,600.00
TOTALS		46.50	\$ 9,300.00

January 12, 2021
Invoice No.: 431157-01

DISBURSEMENTS

	Description	Amount
11/11/20	WestLaw Research, Thomson Reuters - West Payment Center, 843487637	333.45
	TOTAL DISBURSEMENTS	\$ 333.45
	TOTAL THIS MATTER	\$ 9,633.45