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Somerset County Clerk
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April 24, 2024
Invoice 40862752
Billing Attorney: GOLUMG
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Matter #170618.001
Election Matters

For Professional Services as
Recorded Through March 31, 2024

Account Summary

Outstanding Balance as of Invoice Dated 03-29-2024	\$ 5,024.15
Payment Received 04-08-2024	-5,024.15
Outstanding Balance Exclusive of This Invoice	\$ <u>0.00</u>
Amount Due This Invoice	50,654.24
Total Amount Due	\$ <u>50,654.24</u>

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INVOICE

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03/01/24	Somerset County - re: telephone with GJG and Rick Willey.		
	R. H. Tanzman	0.50 hrs.	\$ 125.00
03/01/24	Conference call with County Clerk and M. Coxwell; exchange email with S. Peter; confer R. Wille; call S. Peter and M. Coxwell; call Deputy County Counsel (DCC); review email from DCC; review email from R. Wille and DCC; prepare emails to DCC; review transcript of 2/29 conference with Judge Quraishi; review emails from Court; review discovery requested by some County Clerks; review emails from attorneys for County Clerks.		
	G. Golum	3.80 hrs.	950.00
03/01/24	Conference with co-defendant counsel; strategy discussion with Gordon before same; strategy call with Steve Peter and Maureen; review of transcript from conference and emails; update emails to Steve and DCC; and follow up emails to counsel regarding vendor affidavits. Research for opposition to motion for preliminary injunction and outline for draft brief.		
	R. Wille	3.80 hrs.	950.00
03/02/24	Review email from County Clerk Attorney J/ Carbone; review email R. Wille to S. Peter; review email from R. Wille to DCC; review law regarding indispensable parties to be named in litigation; review email from R. Wille in regard to case and references to case law; prepare email to R. Wille regarding issues.		
	G. Golum	1.30 hrs.	325.00
03/02/24	Research on cases for opposition to motion for preliminary injunction in Kim matter, including failure to join indispensable party argument, Purcel Principle and PI generally. Review of Conforti opinion and pleadings in relation to same. Strategy emails with Gordon Golum and DCC. Email follow up with co-defendants' counsel re vendor certifications and litigation strategy, and updates to client and team. Draft opposition papers.		
	R. Wille	5.20 hrs.	1,300.00

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03/03/24	Review emails from Parikh of Genova Burns, Malamut, R. Wille, S. Peter and Natale; prepare Certification of S. Peter; review email from S. Peter with regard to his Certification; review email R. Wille to DCC.	G. Golum	1.50 hrs.	375.00
03/03/24	Draft certification of Steve Peter, discussion of same and revisions with Gordon Golum, and notes on additional facts and point to clarify with client. Email updates to client, Gordon and DCC.	R. Wille	2.80 hrs.	700.00
03/04/24	Prepare Certification of S. Peter; confer R. Wille; conference call with S. Peter, M. Coxwell and R. Wille; review notices from Court; review email from DCC; review Motion to Intervene by Camden County Democratic Committee; call from S. Peter; review email from Natale; review documents; review emails from F. Komuves.	G. Golum	3.50 hrs.	875.00
03/04/24	Revisions to Peter Certification re opposition to preliminary injunction and challenges relating to same. Strategy call with Steve, Maureen, and Gordon re opposition papers. Follow up with defendants' counsel re vendor certs; and draft opposition papers and research for same.	R. Wille	12.00 hrs.	3,000.00
03/05/24	Review email from counsel for Plaintiffs and counsel for Defendants; review issues and substance for Certification of S. Peter and our Brief in Opposition to Motion for Preliminary Injunction; confer R. Wille; prepare Certification of S. Peter; review email R. Wille to S. Peter regarding Certification of S. Peter; review Court notices; review documents.	G. Golum	2.40 hrs.	600.00
03/05/24	Draft opposition brief and revisions to client Certification in opposition to motion for preliminary injunction in Kim v. Clerks.	R. Wille	10.30 hrs.	2,575.00
03/06/24	Review emails from multiple counsel for other parties in Andy Kim litigation; prepare Brief and Certification of S. Peter; review emails from S. Peter; review multiple Court notices; review emails from M. Coxwell; review email from Natale including Certification from Royal Printing Services President; review email from Decotis; review S. Peter's change to his Certification; confer R. Wille; review documents.			

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	G. Golum	2.80 hrs.	700.00
03/06/24	Draft opposition to motion for preliminary injunction, incorporation of additional helpful points/cases from co-defendants' submissions and review for consistency with same, strategy emails to client re revisions to certification and draft brief, discussion with Gordon Golum re same, strategy emails with co-defendants counsel. Proofread, revised, finalized and filed opposition papers. Update to client.		
	R. Wille	11.60 hrs.	2,900.00
03/07/24	Review Briefs and emails from counsel for parties regarding Motion for Preliminary Injunction; review Court notices; review papers from party seeking to join action as amicus; review legal issues, including indispensable party issue.		
	G. Golum	3.50 hrs.	875.00
03/08/24	Review Motions to Dismiss filed on behalf of several County Clerks; review emails from Court; review emails from counsel for parties; conference call with counsel for the parties - Plaintiffs and some Defendants - regarding discovery and joint submission to Court.		
	G. Golum	4.00 hrs.	1,000.00
03/08/24	Joint meet and confer call with plaintiffs and defense counsel regarding discovery issues, including my pushing for retainer agreements and notifying Plaintiffs that they are not privileged, and push to receive Plaintiffs' proposed witness list and exhibits on Monday before we submit ours.		
	R. Wille	1.20 hrs.	300.00
03/09/24	Review numerous emails from attorneys for County Clerks; review Briefs and law.		
	G. Golum	1.30 hrs.	325.00
03/10/24	Review numerous emails from attorneys for County Clerks; review email from F. Komuves, counsel fro Plaintiffs; conference call with attorneys for County Clerks and Plaintiffs' counsel; conference call with counsel for County Clerks.		
	G. Golum	1.30 hrs.	325.00
03/10/24	Joint call meet and confer with Plaintiffs and Defendants counsel re discovery issues and joint witness and exhibit list. Emails to Plaintiffs' counsel demanding timely discovery, joining requests and preserving objections. Strategy emails and callwith co-defendants' counsel.		
	R. Wille	1.50 hrs.	375.00

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03/11/24	Call County Clerks' attorneys; review email from M. Coxwell; confer R. Wille; review email from F. Komuves with documents including Brief; review and analysis of issues; call S. Peter and M. Coxwell.	G. Golum	4.00 hrs.	1,000.00
03/11/24	Joint defense strategy call, strategy discussions with litigation shareholder Don Taylor and Gordon Golum re hearing, potential for client to testify, co-defendants request for same and objections thereto, and comprehensive update to client.	R. Wille	3.50 hrs.	875.00
03/12/24	Review email notices from Court; review emails from M. Natale; prepare emails to S. Peter and M. Coxwell; review email from M. Coxwell; review Amicus Brief of ACLU; review and analysis of defenses; review email from P. Kaufman.	G. Golum	3.00 hrs.	750.00
03/12/24	Review of Plaintiffs' reply brief and co-defendants' briefs in opposition to preliminary injunction. Strategy calls and emails with counsel and updates to client.	R. Wille	2.00 hrs.	500.00
03/13/24	Review pleadings and certifications; strategy conference on mode of hearing.	D. Taylor	1.20 hrs.	300.00
03/13/24	Review Brief from Plaintiffs' attorney; review submission from Genova Burnes; conference call with counsel for County Clerks; review submissions; call to S. Peter and M. Coxwell; call with Spiro and Nelson regarding witnesses; confer D. Taylor and R. Wille; review emails from counsel for various Count Clerks; research law.	G. Golum	3.20 hrs.	800.00
03/13/24	Joint call with defendants' counsel re preliminary injunction hearing. Strategy meeting with Gordon Golum and litigation shareholder Don Taylor re potential for judge to call client as witness despite not being on witness list and preparation/potential objections to same. Call with co-defendants' counsel regarding hearing strategy and witnesses. Research on legislative history of bracketing statute and sent to co-defendants' counsel for incorporation to opposition. Strategy call with client and calls and emails with Gordon.	R. Wille	3.50 hrs.	875.00

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03/14/24	Conference call with attorneys for County Clerks; review multiple emails from counsel for County Clerks and Plaintiffs; review notices from Court; call S. Peter and M. Coxwell; review email with Plaintiffs' expert report from Macias; prepare Certification of S. Peter; review email Parikh to Amici; review Plaintiffs' counsel letter to Court; review email R. Wille to S. Peter; review experts privilege logs from Plaintiffs' counsel.	G. Golum	2.70 hrs.	675.00
03/14/24	Review of Plaintiffs' expert Macias certification report and notes on preparation for possible client testimony. Joint strategy call with co-defendants' counsel, strategy discussion with Gordon and Wilentz litigation team, and follow up note to file re PI hearing.	R. Wille	5.10 hrs.	1,275.00
03/15/24	Review notices from Court; review emails from counsel for parties; review documents and conference call with County Clerks' counsel; conference call with defense counsel and plaintiffs' counsel; review draft agenda to send to Court; call S. Peter and M. Coxwell; review counsel letters to Court; confer R. Wille; review email from M. DeAnna and prepare email to M. DeAnna.	G. Golum	4.70 hrs.	1,175.00
03/15/24	Joint call with Plaintiffs' and Defendants' counsel regarding joint witness and exhibits list, proposed revisions to same. Strategy call with Gordon Golum re hearing and strategy emails with co-defendants' counsel in preparation for hearing.	R. Wille	4.00 hrs.	1,000.00
03/16/24	Review email from counsel; conference call with F. Komuves, Bromberg and other counsel regarding privilege logs, etc.; exchange emails with other County counsel; exchange email with S. Peter and M. Coxwell; prepare letter to Court; review privilege logs and issues; prepare for hearing on 3/18/24 in Federal District Court; review file in preparation for 3/18/24 hearing.	G. Golum	4.50 hrs.	1,125.00
03/16/24	Meet and confer with Plaintiffs; counsel regarding demand to produce privilege logs, emails to Plaintiffs counsel re same, and strategy emails with co-defendants' counsel re same and other strategy. Draft and filed letter to Court in response to Plaintiffs' letter re privilege log and requesting it compel Plaintiffs to produce revised and complete privilege logs pursuant to Court order. Update to client re same. Preparation of exhibits for hearing.	R. Wille	8.40 hrs.	2,100.00

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03/17/24	Review emails from counsel for parties; review Court notices; call with S. Peter and R. Wille; review file and prepare for 3/18 Court appearance; 2 conference calls with attorneys for County Clerks; review Attorney General letter to Judge emailed today; review email R. Wille to S. Peter and M. Coxwell; review documents; review legal issues.	G. Golum	4.50 hrs.	1,125.00
03/17/24	Preparation for preliminary injunction hearing, including review of potential objections, preparation for potential Court questioning/cross-examination of client and related strategy, and preparation of exhibits. Review of letter from AG Platkin, urgent joint call with Co-defendants' counsel re same, research on why Court should not consider same and second strategic discussion re same with co-defendants' counsel. Emails and call with client and Gordon re same and hearing generally.	R. Wille	4.60 hrs.	1,150.00
03/18/24	Attend Federal District Court hearing in Trenton; review emails from counsel for the parties; review Court notices and trial documents that may be used in testimony.	G. Golum	12.20 hrs.	3,050.00
03/18/24	Travel to and appearance at hearing for preliminary injunction to represent Somerset County Clerk's interest, address any inquiries from Court or provide any necessary consents/stipulation, spot potential issues for appeal and potential request for relief from order if injunction granted, provide strategic insights to co-defendants' counsel re same, and be prepared with backup copies of potential exhibits. Left office 8:15 am, arrived back at 9:30 pm, courtesy to client of 1 hour 15 minutes.	R. Wille	12.00 hrs.	3,000.00
03/19/24	Review emails from attorneys for County Clerks; review notices from the Court; prepare email to S. Peter and M. Coxwell; prepare email to counsel for County Clerks; review Court notices; review email from M. Coxwell; review file regarding testimony at 3/18 Court hearing and issues.	G. Golum	2.20 hrs.	550.00
03/20/24	Review multiple emails from defense counsel; call counsel; call S. Peter; review Brief filed by AG in Conforti emailed by M. Williams, Middlesex County Counsel; review email from S. Peter with documents; confer R. Wille regarding AG, etc.; review joint letter; review Court notice; review email from Komuves, Plaintiff counsel, and review issues.	G. Golum	1.70 hrs.	425.00

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03/20/24	Joint call with defense counsel regarding post-hearing tasks and labor allocation. Review of notes and research for response to AG letter. Emails with counsel and client re bond certification, call with client re same. Draft letter response to AG's letter.		
	R. Wille	6.00 hrs.	1,500.00
03/21/24	Prepare letter to Judge regarding the AG letter to Court; prepare emails to S. Peter and M. Coxwell; review transcript of the 3/18/24 hearing before the Court; confer R. Wille regarding letter to Court and review R. Wille emails to defense counsel regarding letter relating to AG letter to Court; review multiple emails from defense counsel.		
	G. Golum	2.70 hrs.	675.00
03/21/24	Draft response to AG letter, submitted to Gordon Golum and discussed revisions to same. Revised letter and circulated to defense counsel for review and comment.		
	R. Wille	4.00 hrs.	1,000.00
03/22/24	Review emails from defense counsel; review email from M. Coxwell regarding Bond and costs to comply with preliminary injunction if issued; review email from S. Peter; review standard for appeal to Third Circuit Court of Appeals if preliminary injunction entered by Court; review court notices; review email from court reporter with corrected transcript of 3/18 hearing before the Court.		
	G. Golum	3.80 hrs.	950.00
03/22/24	Finalized, filed to Court and served on parties response to AG Platkin letter. Discussion of revisions and confirmation of consent with other clerks' counsel, as Judge asked for consolidated letter. Strategy and update discussion with client re letter, bond certification and relevant facts, and potential appeal of adverse decision. Review of supplemental filings by Plaintiffs.		
	R. Wille	3.10 hrs.	775.00
03/24/24	Review emails from counsel for defendants.		
	G. Golum	0.40 hrs.	100.00
03/25/24	Review emails from defense counsel; call defense counsel; call with S. Peter and M. Coxwell; review letters to Judge Quraishi regarding bond and request for Case Management Conference; review Court notices; review letter from attorneys of Campos Medina to Court; review letter from attorney for A. Kim; review letters from other counsel; review issues.		
	G. Golum	2.00 hrs.	500.00

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03/25/24	Joint defense call with all clerks' counsel re change in Kim's harm and need to establish record. Discussion of draft letter on behalf of all clerks raising change of harms issue and requesting supplemental hearing re same. Strategy discussion call with Steve Peter, Maureen Coxwell and Gordon Golum re request for emergency hearing, change of Kim's harms, post-hearing strategy re bond and potential appeal.	R. Wille	1.30 hrs.	325.00
03/26/24	Review file for conference call with Judge and counsel for the parties; conference call with Judge Quraishi; review email from Genova with letter by Tammy Murphy to Secretary of State; conference call with defense counsel; review email from Lebersfeld, Genova Burns, with draft summation; review text order from Court; review Court notices; review email letter from Plaintiffs' attorneys to Judge; review email from J. Carbone.	G. Golum	3.30 hrs.	825.00
03/26/24	Emergency hearing before Judge Quraishi re change in harms and supplementation of factual record. Strategy call with all defense counsel re consolidated 5 page submission to Court and potential arguments.	R. Wille	1.70 hrs.	425.00
03/27/24	Conference call with defense counsel; review text Order from Court; review emails from defense counsel; review issues; review record documents.	G. Golum	1.30 hrs.	325.00
03/27/24	Meeting with defense counsel regarding joint submissions to Court for (1) change in harm analysis due to Murphy dropping out and Kim getting lines; and (2) exhibits for Court's consideration.	R. Wille	0.50 hrs.	125.00
03/28/24	Review emails from defense counsel.	G. Golum	0.20 hrs.	50.00
03/29/24	Prepare emails to S. Peter and M. Coxwell; review email from Court with Order and opinion; call from DCC; review numerous emails from defense counsel; review notices from Court; review email from S. Peter; review multiple emails from Genova Burns and other defense counsel; prepare emails to A. Genova and review email from A. Genova regarding Somerset joining in application for a stay and appeal; review letter sent to Court on behalf of Morris County Republican Committee; review issues.			

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	G. Golum	5.00 hrs.	1,250.00
03/30/24	Review numerous emails from defense counsel; prepare emails to defense counsel; prepare emails to S. Peter and M. Coxwell; review email from Lebersfeld with Notice of Appeal; review Court notices; prepare email to A. Genova.		
	G. Golum	0.80 hrs.	200.00
03/31/24	Review numerous emails from defense counsel; review Court notices; review Motion to Intervene on behalf of Morris County Republican Committee; review email from counsel for Morris County Republican Committee; review email from R. Wille to M. Coxwell and S. Peter regarding Motion to Intervene and notices regarding Hudson and Bergen County Clerks withdrawal from appeal and stay application; review email from M. Coxwell; prepare emails to M. Coxwell and S. Peter.		
	G. Golum	1.20 hrs.	300.00
03/31/24	Review of Judge Quraishi's Order re scope of PI and Republican primary, and letters from Hudson and Burlington clerks withdrawing from appeal. Strategy emails with defense counsel and client re same. Review of filed Morris GOP position in Motion to Intervene and application for emergency decision re same.		
	R. Wille	1.00 hrs.	250.00

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SUMMARY OF FEES

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Dollars</u>
G. Golum	88.80	250.00	22,200.00
R. H. Tanzman	0.50	250.00	125.00
D. Taylor	1.20	250.00	300.00
R. Wille	109.10	250.00	27,275.00
TOTAL	199.60		49,900.00

Total Fees for Professional Services \$ 49,900.00

REIMBURSABLE COSTS

Westlaw Legal Research 754.24

Total Reimbursable Costs \$ 754.24

Current Billing for This Matter..... \$ 50,654.24

DUE UPON RECEIPT
FEDERAL TAX I.D. #22-2292919

WILENTZ

Attorneys at Law

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Somerset County Clerk
Steve Peter, Somerset County Clerk
Administration Bldg.
Po Box 3000, 20 Grove St.
Somerset, NJ 08876-1262

April 24, 2024
Invoice 40862752
Billing Attorney: GOLUMG
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TOTAL DUE FOR THIS MATTER.....	\$ 50,654.24
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Matter #170618.001
Election Matters

For Professional Services as
Recorded Through March 31, 2024

REMITTANCE PAGE

PLEASE RETURN THIS PAGE WITH YOUR PAYMENT

Fees for Professional Services.....	\$	49,900.00
Reimbursable Costs		754.24
Current Billing for This Invoice		50,654.24
TOTAL DUE	\$	50,654.24

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