

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440

Iselin, NJ 08830

Telephone: 7327094182

Fax: 7327911555

January 29, 2024

Invoice No. 18100

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold

Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action

For Services Rendered from 10/1/2023 Through 1/29/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
1/2/2024	RHG	Correspondence to Peter Valesi re: status and review response.	0.30	\$58.50
1/3/2024	MMW	Conducted case preparation and drafting of the notice to property owner of record.	1.50	\$292.50
1/3/2024	MMW	Drafted the ordinance for eminent domain acquisition.	1.20	\$234.00
1/3/2024	MMW	Made edits and completed final review of notice letter to property owner.	0.40	\$78.00
1/3/2024	DF	Request Title; emails to/from Laura Kaczur	0.20	\$24.00
1/3/2024	RHG	Telephone conference with Steve Schepis, attorney for Reservoir Rd., re: status and negotiations.	0.30	\$58.50
1/3/2024	RHG	Correspondence to Steve Schepis re: negotiations and appraisal.	0.30	\$58.50
1/3/2024	RHG	Review title issues, draft 14-day letter and draft ordinance and issues re: same.	1.30	\$253.50
1/4/2024	DF	Receipt and review of order confirmation from Stephanie Finch	0.20	\$24.00
1/5/2024	RHG	Review and revise authorizing ordinance; correspondence to Peter Valesi re: same.	0.40	\$78.00
1/17/2024	RHG	Review title binder report of title, record owner Starges and back title documents and information.	0.70	\$136.50
1/18/2024	RHG	Review correspondence from Paul Femicola and correspondence to clients re: same; review response.	0.20	\$39.00

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Matter Number: 149-0001

1/29/2024

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1/18/2024	RHG	Review issues raised by Paul Fernicola and public purpose issue.	0.40	\$78.00
1/19/2024	RHG	Review correspondence from Paul Fernicola and respond re: public purpose.	0.30	\$58.50
1/19/2024	RHG	Review title issues, easements and restrictive covenants.	1.20	\$234.00
Billable Hours / Fees:			8.90	\$1,705.50

Timekeeper Summary

Timekeeper MMW worked 3.10 hours at \$195.00 per hour, totaling \$604.50.

Timekeeper RHG worked 5.40 hours at \$195.00 per hour, totaling \$1,053.00.

Timekeeper DF worked 0.40 hours at \$120.00 per hour, totaling \$48.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
1/2/2024	B/W Photocopies	\$1.95	
1/2/2024	B/W Photocopies	\$1.95	
1/3/2024	B/W Photocopies	\$0.65	
1/3/2024	B/W Photocopies	\$0.65	
1/3/2024	B/W Photocopies	\$1.30	
1/3/2024	B/W Photocopies	\$0.95	
1/3/2024	B/W Photocopies	\$2.10	
1/3/2024	B/W Photocopies	\$0.95	
1/3/2024	B/W Photocopies	\$0.95	
1/3/2024	B/W Photocopies	\$85.65	
1/3/2024	B/W Photocopies	\$0.60	
1/3/2024	B/W Photocopies	\$1.30	
1/3/2024	B/W Photocopies	\$0.90	
1/4/2024	Postage	\$19.15	
1/4/2024	Postage	\$26.40	
1/17/2024	Title Search	\$455.00	
Total Costs		\$600.45	

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Client Number: 4738
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1/29/2024
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Current Invoice Summary

Current Fees:	\$1,705.50
Advanced Costs:	\$600.45
TOTAL AMOUNT DUE:	<u>\$2,305.95</u>

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Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,

Suite 440

Iselin, NJ 08830

Telephone: 7327094182

Fax: 7327911555

February 28, 2024

Invoice No. 18353

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold

Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action

For Services Rendered from 1/1/2024 Through 2/28/2024.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
2/5/2024	AZ	Review Freehold Township eminent domain matter and issues	0.30	\$58.50
2/6/2024	RHG	Telephone conference with Paul Femicola re: status and negotiations.	0.30	\$58.50
2/6/2024	RHG	Review correspondence and documents from Paul Femicola.	0.20	\$39.00
2/20/2024	RHG	Review correspondence from Peter Valesi and respond re: status.	0.20	\$39.00
2/21/2024	AZ	Prepare pleadings re Reservoir Road Paterson, LLC	1.20	\$234.00
2/22/2024	MRB	Update and status review regarding condemnation action.	0.50	\$97.50
2/23/2024	MRB	Research and analysis regarding public purpose and bona fide negotiations argument.	1.80	\$351.00
2/23/2024	MRB	Receipt and review correspondence from property owner counsel regarding negotiation position and public purpose argument.	0.30	\$58.50
2/23/2024	MRB	Status update and review of file regarding verified complaint and order to show cause.	0.30	\$58.50
2/23/2024	MMW	Case preparation and review for upcoming court filing.	0.50	\$97.50
2/23/2024	MMW	Began drafting complaint for taking in eminent domain action.	0.80	\$156.00
2/23/2024	MRB	Telephone conference with appraiser regarding valuation.	0.30	\$58.50

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2/28/2024
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2/27/2024	MMW	Drafting of complaint to be filed for condemnation of 3670 Route 9.	2.80	\$546.00
2/28/2024	MMW	Editing complaint for condemnation re: Block 70.05 Lot 10	1.50	\$292.50
Billable Hours / Fees:			11.00	\$2,145.00

Timekeeper Summary

Timekeeper MMW worked 5.60 hours at \$195.00 per hour, totaling \$1,092.00.

Timekeeper RHG worked 0.70 hours at \$195.00 per hour, totaling \$136.50.

Timekeeper MRB worked 3.20 hours at \$195.00 per hour, totaling \$624.00.

Timekeeper AZ worked 1.50 hours at \$195.00 per hour, totaling \$292.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
1/4/2024	B/W Photocopies	\$0.30	
1/5/2024	B/W Photocopies	\$1.95	
1/5/2024	B/W Photocopies	\$0.65	
1/5/2024	B/W Photocopies	\$0.90	
1/17/2024	B/W Photocopies	\$36.80	
1/17/2024	B/W Photocopies	\$15.90	
1/17/2024	B/W Photocopies	\$0.30	
Total Costs		\$56.80	

Current Invoice Summary

Current Fees:	\$2,145.00
Advanced Costs:	\$56.80
TOTAL AMOUNT DUE:	\$2,201.80

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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

December 27, 2024

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Invoice No. 21078

Client Number: 4738 Township of Freehold
Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action
For Services Rendered from 7/1/2024 Through 12/27/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/27/2024	MRB	Receipt and review correspondence regarding status of project.	0.20	\$39.00
12/16/2024	MRB	Receipt and review correspondence from developer regarding site plan approval.	0.20	\$39.00
12/16/2024	MRB	Receipt and review correspondence from administration regarding meeting.	0.10	\$19.50
12/19/2024	MRB	Preparation and attendance at meeting with developer regarding planning submissions.	0.90	\$175.50
12/23/2024	MRB	Receipt and review correspondence from opposing counsel. Review of motion and brief seeking attorney's fees with attached documentation of time.	1.50	\$292.50
12/23/2024	SJ	Receipt and review courts notification re Defendant Reservoir Notice of Motion for Recovery of Attorney Fees and Cost.	0.20	\$24.00
Billable Hours / Fees:			3.10	\$589.50

Timekeeper Summary

Timekeeper MRB worked 2.90 hours at \$195.00 per hour, totaling \$565.50.

Timekeeper SJ worked 0.20 hours at \$120.00 per hour, totaling \$24.00.

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12/27/2024
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Current Invoice Summary

Current Fees:	\$589.50
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	<u>\$589.50</u>

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Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

March 28, 2024

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Invoice No. 18614

Client Number: 4738 Township of Freehold
Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action
For Services Rendered from 1/1/2024 Through 3/28/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
2/23/2024	RHG	Review status and open issues re: property acquisition and issues re: proposed development and negotiations.	0.40	\$78.00
2/23/2024	LNR	Phone conference with Peter Valesi.	0.20	\$39.00
2/23/2024	LNR	Phone conference with Marty Allen.	0.30	\$58.50
2/28/2024	MRB	Draft and revise Verified Complaint. Review of County records regarding property.	1.20	\$234.00
2/28/2024	MRB	Review of title report and easement statuses	0.50	\$97.50
2/29/2024	MMW	Edited verified complaint for taking.	0.50	\$97.50
2/29/2024	MMW	Drafted Order to Show Cause for taking.	1.50	\$292.50
2/29/2024	MMW	Drafting Order for Payment to the Court for taking.	1.00	\$195.00
2/29/2024	MMW	Drafting Declaration of Taking for taking.	1.00	\$195.00
2/29/2024	MRB	Review and editing draft taking complaints documents with attachments.	0.80	\$156.00
3/12/2024	MRB	Receipt and review correspondence regarding condemnation complaint.	0.20	\$39.00
3/14/2024	MMW	Review and compilation of drafted verified complaint; declaration of taking; order for payment to the court; and order to show cause.	0.40	\$78.00
3/14/2024	MRB	Review of file. Research regarding public purpose and response to property owner correspondence.	1.30	\$253.50

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Matter Number: 149-0001

3/28/2024
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3/15/2024	MRB	Review and revisions to draft condemnation complaint and order to show cause.	0.50	\$97.50
3/15/2024	MMW	Edited verified complaint.	0.30	\$58.50
3/15/2024	MMW	Edited Order to For Payment to Court.	0.20	\$39.00
3/15/2024	MMW	Edited Order to Show Cause.	0.20	\$39.00
3/20/2024	MRB	Update regarding status of negotiations and additional concerns regarding filing and eminent domain litigation.	0.30	\$58.50
3/21/2024	LNR	Phone conference with Irina Elgart.	1.00	\$195.00
3/21/2024	LNR	Phone conference with Irina Elgart.	0.30	\$58.50
3/21/2024	LNR	Meeting with Paul Fernicola, property owner and P. Valeri.	2.00	\$390.00
Billable Hours / Fees:			14.10	\$2,749.50

Timekeeper Summary

Timekeeper MRB worked 4.80 hours at \$195.00 per hour, totaling \$936.00.

Timekeeper LNR worked 3.80 hours at \$195.00 per hour, totaling \$741.00.

Timekeeper MMW worked 5.10 hours at \$195.00 per hour, totaling \$994.50.

Timekeeper RHG worked 0.40 hours at \$195.00 per hour, totaling \$78.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
2/7/2024	B/W Photocopies	\$0.65	
2/7/2024	B/W Photocopies	\$0.65	
3/14/2024	B/W Photocopies	\$2.15	
3/14/2024	B/W Photocopies	\$0.90	
3/14/2024	B/W Photocopies	\$0.30	
3/14/2024	B/W Photocopies	\$1.50	
3/21/2024	B/W Photocopies	\$0.95	
Total Costs		\$7.10	

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3/28/2024
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Current Invoice Summary

Current Fees:	\$2,749.50
Advanced Costs:	\$7.10
TOTAL AMOUNT DUE:	<u>\$2,756.60</u>

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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

September 09, 2024

Invoice No. 20135

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold

Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action

For Services Rendered from 5/1/2024 Through 8/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/2/2024	SJ	receipt and review courts notification re motion to intervene will be decided 8/16	0.20	\$24.00
8/5/2024	MRB	Update regarding status of motion to intervene. Review and analysis regarding appraisal and engineering plans.	0.50	\$97.50
8/7/2024	MRB	Receipt and review correspondence regarding engineering and plan designs. Review proposed engineering adjustments and site layout.	0.40	\$78.00
8/7/2024	MRB	Update, review and conference regarding case status and motion to intervene. Review and analysis regarding appraisal.	0.50	\$97.50
8/7/2024	MRB	Correspondence with engineers regarding plan revisions.	0.20	\$39.00
8/7/2024	MRB	Receipt and review correspondence from developer regarding follow-up engineering designs.	0.10	\$19.50
8/9/2024	MRB	Preparation and attendance at conference with administration and developers.	0.80	\$156.00
8/9/2024	LNR	Review revised Brookdale Access Plan.	0.30	\$58.50
8/12/2024	MRB	Status update and conference regarding motion to intervene.	0.30	\$58.50
8/13/2024	MRB	Draft correspondence to Court regarding motion to intervene.	0.40	\$78.00

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Client Number: 4738
 Matter Number: 149-0001

9/9/2024
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8/14/2024	MRB	Receipt and review correspondence from engineers with proposed driveway improvements. Review of appraisal regarding impact of proposal. Correspondence regarding outstanding issues for consideration.	0.30	\$58.50
8/14/2024	SJ	receipt and review courts notification re ltr to the court re motion to intervene	0.20	\$24.00
8/16/2024	MRB	Initial receipt review and analysis of opposition to eminent domain action and motion to dismiss.	1.70	\$331.50
8/16/2024	MRB	Receipt and review correspondence from Court with attached order.	0.20	\$39.00
8/16/2024	SJ	receipt and review courts notification re Order to intervene - Granted	0.20	\$24.00
8/18/2024	MRB	Review and analysis regarding opposition to eminent domain. Research regarding claims.	2.60	\$507.00
8/19/2024	MRB	Correspondence with developer's counsel.	0.20	\$39.00
8/19/2024	MRB	Telephone conference with developer counsel.	0.50	\$97.50
8/19/2024	MRB	Research and preparation of reply to opposition regarding non-contiguous parcels.	2.10	\$409.50
8/19/2024	MRB	Research and analysis regarding requirements of bona fide negotiations in preparation for reply to opposition brief.	2.30	\$448.50
8/20/2024	SJ	receipt and review courts notification re Defendant Reservoir Road Paterson NOM to Dismiss Plaintiff's complaint	0.20	\$24.00
8/20/2024	LJH	Conduct research regarding zoning laws and merger doctrine	2.20	\$429.00
8/20/2024	MRB	Receipt and review correspondence from Court regarding motion.	0.20	\$39.00
8/20/2024	MRB	Research regarding preparation of response to motion to dismiss.	1.20	\$234.00
8/21/2024	SJ	receipt and review courts notification re MTD will be decided on 9-13	0.20	\$24.00
8/21/2024	LJH	Draft memo regarding merging of properties under merger doctrine	1.90	\$370.50
8/21/2024	MRB	Receipt and review correspondence and memorandum regarding merger doctrine.	0.40	\$78.00
8/22/2024	MRB	Telephone conference with developer counsel.	0.20	\$39.00
8/28/2024	MRB	Receipt and review of opposition to order to show cause from defendant.	0.70	\$136.50
8/28/2024	SJ	receipt and review courts notification re Defendant Brookdale opposition & cert of D. Stout	0.20	\$24.00

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9/9/2024
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Billable Hours / Fees: 21.40 \$4,083.00

Timekeeper Summary

Timekeeper MRB worked 15.80 hours at \$195.00 per hour, totaling \$3,081.00.

Timekeeper SJ worked 1.20 hours at \$120.00 per hour, totaling \$144.00.

Timekeeper LJH worked 4.10 hours at \$195.00 per hour, totaling \$799.50.

Timekeeper LNR worked 0.30 hours at \$195.00 per hour, totaling \$58.50.

Current Invoice Summary

Current Fees:	\$4,083.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$4,083.00

Thank You for Letting Us Serve You.
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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

May 31, 2024

Invoice No. 19209

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold
Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action
For Services Rendered from 2/1/2024 Through 5/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/1/2024	MRB	Receipt and review correspondence regarding opposing counsel, negotiations and Township Engineer.	0.30	\$58.50
5/1/2024	MRB	Receipt and review correspondence regarding deposit of funds and Superior Court proceedings.	0.20	\$39.00
5/1/2024	MRB	Receipt and review correspondence from Developer regarding eminent domain matter	0.10	\$19.50
5/1/2024	MRB	Receipt and review correspondence regarding county engineer certification and Route 537 corridor development.	0.20	\$39.00
5/1/2024	MRB	Receipt and review correspondence from engineer regarding master plan. Review of master plan with respect to takings provisions and implementation of PUD-1.	1.10	\$214.50
5/1/2024	MRB	Research regarding public policy taking intersection with commercial development.	0.80	\$156.00
5/6/2024	MRB	Receipt and review correspondence from developer.	0.20	\$39.00
5/7/2024	MRB	Receipt and review correspondence regarding meeting on eminent domain matter.	0.20	\$39.00
5/7/2024	MRB	Receipt and review correspondence from developer.	0.20	\$39.00
5/7/2024	MRB	Receipt and review correspondence from developer counsel regarding taking.	0.20	\$39.00
5/7/2024	LNR	Phone conference with Irene Elgert.	0.30	\$58.50

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5/31/2024
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5/9/2024	MRB	Receipt and review correspondence regarding BOA condemnation (x4)	0.20	\$39.00
5/13/2024	MRB	Attendance at conference regarding taking and public purpose determinations.	0.60	\$117.00
5/13/2024	LNR	Phone conference with Edgewood Properties.	0.50	\$97.50
5/14/2024	MRB	Correspondence with developer counsel regarding preparation of certifications.	0.20	\$39.00
5/17/2024	MRB	Receipt and review correspondence from developer counsel.	0.20	\$39.00
5/30/2024	MRB	Receipt and response to correspondence from developer counsel regarding eminent domain action.	0.20	\$39.00
5/30/2024	MRB	Editing and preparation of Complaint in Condemnation.	1.20	\$234.00
Billable Hours / Fees:			6.90	\$1,345.50

Timekeeper Summary

Timekeeper MRB worked 6.10 hours at \$195.00 per hour, totaling \$1,189.50.

Timekeeper LNR worked 0.80 hours at \$195.00 per hour, totaling \$156.00.

Current Invoice Summary

Current Fees:	\$1,345.50
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$1,345.50

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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

September 27, 2024

Invoice No. 20273

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold

Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action

For Services Rendered from 6/1/2024 Through 9/27/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
9/4/2024	MRB	Telephone conference with developer's counsel.	0.20	\$39.00
9/4/2024	MRB	Draft correspondence to Court regarding reply timelines.	0.30	\$58.50
9/4/2024	SJ	receipt and review courts notification re ltr to the judge re briefing due dates	0.20	\$24.00
9/4/2024	SJ	telephone call to chambers re briefing schedule x 2	0.20	\$24.00
9/4/2024	SJ	review and finalize ltr to chambers re briefing schedule due dates for our reply	0.20	\$24.00
9/4/2024	MRB	Research and preparation of reply to opposition to order to show cause.	2.10	\$409.50
9/5/2024	MRB	Receipt and response to correspondence from administration regarding engineering plans. Review of attached documents.	0.40	\$78.00
9/5/2024	MRB	Telephone conference with law clerk regarding amendments to scheduling order.	0.30	\$58.50
9/5/2024	MRB	Receipt and review correspondence from Court regarding OTSC and Motion for Dismissal.	0.20	\$39.00
9/5/2024	MRB	Receipt and review correspondence from Brookdale counsel.	0.20	\$39.00
9/5/2024	MRB	Review and drafting of reply brief to motion to dismiss.	1.60	\$312.00
9/6/2024	MRB	Telephone conference with Brookdale counsel regarding status of negotiations and engineering issues.	0.30	\$58.50

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Client Number: 4738
Matter Number: 149-0001

9/27/2024
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9/6/2024	MRB	Receipt and response to correspondence from administration regarding access agreements.	0.20	\$39.00
9/6/2024	MRB	Correspondence with engineer.	0.20	\$39.00
9/6/2024	MRB	Receipt and review correspondence from Court.	0.20	\$39.00
9/6/2024	MRB	Draft correspondence with administration regarding avenues for resolution.	0.30	\$58.50
9/6/2024	MRB	Correspondence with administration regarding procedure and negotiation points.	0.30	\$58.50
9/6/2024	SJ	receipt and review courts notification re OTSC hearing 9/27	0.20	\$24.00
9/6/2024	SJ	receipt and review courts notification re OTSC hearing 9/13 adjourned	0.20	\$24.00
9/8/2024	MRB	Review and preparation of reply brief.	0.50	\$97.50
9/9/2024	LNR	Phone conference with J. Morris.	0.30	\$58.50
9/11/2024	MRB	Research and analysis regarding public purpose, easement takings and right of access takings.	1.60	\$312.00
9/11/2024	MRB	Draft reply brief.	1.20	\$234.00
9/12/2024	MRB	Draft reply brief.	0.60	\$117.00
9/13/2024	MMW	Drafting index of documents, exhibits, and related filings of defendants cross motion to dismiss	0.50	\$97.50
9/13/2024	MMW	Document review of exhibits and related filings of defendants cross motion to dismiss marked 1 - 508	0.50	\$97.50
9/13/2024	MRB	Revision and final draft of reply brief. Submission of reply brief to Court.	7.50	\$1,462.50
9/13/2024	SJ	review and edit reply brief; draft a TOA and TOC	0.80	\$96.00
9/13/2024	SJ	receipt and review courts notification re reply brief	0.20	\$24.00
9/16/2024	SJ	receipt and review courts notification re adjournment request	0.20	\$24.00
9/16/2024	MRB	Research and preparation in anticipation of oral argument.	0.80	\$156.00
9/16/2024	MRB	Receipt and review correspondence from opposing counsel to Court.	0.20	\$39.00
9/16/2024	MRB	Receipt and response to correspondence from Court.	0.20	\$39.00
9/16/2024	MRB	Receipt and review correspondence from opposing counsel to court.	0.20	\$39.00

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Client Number: 4738
Matter Number: 149-0001

9/27/2024
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9/16/2024	MRB	Receipt and review correspondence from opposing counsel to court.	0.10	\$19.50
9/16/2024	MRB	Receipt and review correspondence from Court regarding OTSC and Motion to Dismiss.	0.20	\$39.00
9/17/2024	SJ	receipt and review courts notification re OTSC hearing on 9/27 adjourned	0.20	\$24.00
9/17/2024	MRB	Receipt and review correspondence from Court.	0.20	\$39.00
9/18/2024	SJ	receipt and review courts notification re OTSC hearing 9/25	0.20	\$24.00
9/18/2024	MRB	Receipt and review correspondence from Court.	0.20	\$39.00
9/24/2024	MRB	Telephone conference with counsel for developer.	0.60	\$117.00
9/24/2024	MRB	Review of file and preparation for hearing.	1.90	\$370.50
9/25/2024	MRB	Research review and preparation for hearing.	1.60	\$312.00
9/25/2024	SJ	receipt and review courts notification re status conference 10/25	0.20	\$24.00
9/25/2024	SJ	receipt and review courts notification re OA granted scheduled for 10/25	0.20	\$24.00
9/25/2024	RHG	Review litigation status and legal arguments for Order to Show Cause.	0.40	\$78.00
9/25/2024	MRB	Attendance at Court hearing.	2.60	\$507.00
Billable Hours / Fees:			31.70	\$5,956.50

Timekeeper Summary

Timekeeper SJ worked 3.00 hours at \$120.00 per hour, totaling \$360.00.
Timekeeper MRB worked 27.00 hours at \$195.00 per hour, totaling \$5,265.00.
Timekeeper LNR worked 0.30 hours at \$195.00 per hour, totaling \$58.50.
Timekeeper RHG worked 0.40 hours at \$195.00 per hour, totaling \$78.00.
Timekeeper MMW worked 1.00 hours at \$195.00 per hour, totaling \$195.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
9/4/2024	B/W Photocopies	\$31.85	
Total Costs		\$31.85	

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9/27/2024
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Current Invoice Summary

Current Fees:	\$5,956.50
Advanced Costs:	\$31.85
TOTAL AMOUNT DUE:	<u>\$5,988.35</u>

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Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

May 02, 2024

Invoice No. 18937

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold

Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action

For Services Rendered from 1/1/2024 Through 4/30/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
4/9/2024	MRB	Update and final review regarding eminent domain ordinance.	0.30	\$58.50
4/9/2024	LNR	Phone conference with P. Valesi.	0.20	\$39.00
4/11/2024	MRB	Review of verified complaint, order to show cause and draft documents for filing.	0.40	\$78.00
4/15/2024	MRB	Correspondence with administration regarding draft verified complaint.	0.20	\$39.00
4/16/2024	MRB	Receipt and review correspondence from administration regarding verified complaint.	0.20	\$39.00
4/16/2024	MRB	Preparation of verified complaint and order to show cause for filing.	0.40	\$78.00
4/16/2024	MRB	Receipt, review and analysis regarding counteroffer from property owner. Research regarding response.	0.60	\$117.00
4/16/2024	MRB	Additional research regarding public purpose takings.	0.80	\$156.00
4/16/2024	LNR	Review letter from Femicola; email client.	0.40	\$78.00
4/17/2024	MRB	Preparation and review regarding exhibits and appraisal report for verified complaint.	0.50	\$97.50
4/22/2024	MRB	Review and update regarding deposit of funds into Court and eminent domain ordinance. Correspondence with administration.	0.30	\$58.50
4/22/2024	MRB	Receipt and review correspondence from administration regarding ordinance.	0.20	\$39.00

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Matter Number: 149-0001

5/2/2024
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4/22/2024	MRB	Research and analysis regarding order to deposit funds and deposit requirements.	0.60	\$117.00
4/29/2024	LNR	Review letter from Fornicola, respond.	0.20	\$39.00
4/29/2024	LNR	Review GDP agreement outline notice to developers.	0.50	\$97.50
4/29/2024	LNR	Review GDP Agreement letter to Edgewoiod.	0.50	\$97.50
Billable Hours / Fees:			6.30	\$1,228.50

Timekeeper Summary

Timekeeper LNR worked 1.80 hours at \$195.00 per hour, totaling \$351.00.

Timekeeper MRB worked 4.50 hours at \$195.00 per hour, totaling \$877.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
4/17/2024	B/W Photocopies	\$0.95	
4/17/2024	B/W Photocopies	\$0.95	
Total Costs		\$1.90	

Current Invoice Summary

Current Fees:	\$1,228.50
Advanced Costs:	\$1.90
TOTAL AMOUNT DUE:	\$1,230.40

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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

October 31, 2024

Invoice No. 20523

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold

Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action

For Services Rendered from 6/1/2024 Through 10/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
9/26/2024	MRB	Receipt and review correspondence from opposing counsel regarding access plan.	0.20	\$39.00
9/26/2024	MRB	Receipt and review correspondence from Court.	0.10	\$19.50
9/26/2024	MRB	Correspondence with administration regarding Court appearance and required actions.	0.30	\$58.50
9/26/2024	MRB	Receipt and response to correspondence from opposing counsel regarding meeting with NJDOT.	0.20	\$39.00
9/27/2024	MRB	Receipt and review correspondence from opposing counsel regarding additional investigations.	0.20	\$39.00
9/27/2024	MRB	Telephone conference with developer counsel regarding status.	0.40	\$78.00
9/30/2024	MRB	Receipt and review correspondence from Court with Case Management Order.	0.20	\$39.00
9/30/2024	SJ	receipt and review courts notification re Order granted hearing will be 10/25	0.20	\$24.00
10/2/2024	MRB	Receipt and response to correspondence from developer counsel.	0.20	\$39.00
10/9/2024	MRB	Receipt and review correspondence from defense counsel regarding meeting with NJDOT.	0.20	\$39.00
10/9/2024	MRB	Receipt and review correspondence from Brookdale counsel regarding status.	0.20	\$39.00
10/9/2024	MRB	Correspondence with developer's counsel regarding update on court mandated meetings.	0.20	\$39.00

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10/31/2024

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10/10/2024	MRB	Telephone conference with developer counsel regarding meetings with DOT.	0.30	\$58.50
10/11/2024	MRB	Draft correspondence regarding meetings with DOT and County regarding taking.	0.30	\$58.50
10/14/2024	MRB	Telephone conference with developers counsel regarding proposed intersection. Review and analysis regarding proposed modifications and submissions to court.	0.30	\$58.50
10/14/2024	MRB	Correspondence with opposing counsel regarding draft intersection modifications.	0.20	\$39.00
10/14/2024	MRB	Receipt and review correspondence from developer's counsel regarding engineers.	0.20	\$39.00
10/16/2024	MRB	Receipt and review correspondence from developer counsel regarding updated access plan. Review of updated access plan.	0.20	\$39.00
10/18/2024	MRB	Follow up with opposing counsel regarding DOT meeting.	0.20	\$39.00
10/18/2024	MRB	Receipt and review correspondence from opposing counsel.	0.20	\$39.00
10/18/2024	MRB	Correspondence with developer counsel regarding status update and alternate proposals.	0.20	\$39.00
10/18/2024	MRB	Receipt and response to correspondence from Brookdale counsel regarding settlement conference.	0.20	\$39.00
10/22/2024	SJ	receipt and review courts notification re defendant reservoir road paterson llc, ltr to judge request a ruling on the pending OTSC	0.20	\$24.00
10/22/2024	MRB	Receipt and review correspondence from Court regarding conference. Receipt and review correspondence from opposing counsel regarding conference.	0.30	\$58.50
10/22/2024	MRB	Telephone conference with administration regarding status of meetings and development plan updates.	0.40	\$78.00
10/23/2024	MRB	Telephone conference with developer counsel regarding meetings with DOT.	0.30	\$58.50
10/23/2024	MRB	Receipt and review correspondence from administration. Review of proposed concept plan.	0.30	\$58.50
10/23/2024	MRB	Receipt and review correspondence from opposing counsel and Court regarding case status conference (x4)	0.30	\$58.50

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10/31/2024
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10/23/2024	MRB	Receipt and review correspondence from property developer regarding proposed alternate concept plan. Review of attached documents.	0.20	\$39.00
10/24/2024	MRB	Receipt and review correspondence from administration regarding preparation for Court. Telephone conference with administration regarding updated concept plans.	0.30	\$58.50
10/24/2024	MRB	Review of file, master plan and documentation regarding improvements. Draft certifications for submission to Court.	2.10	\$409.50
10/24/2024	SJ	Draft ltr to judge lemieux enclosing two certifications each of them having an exhibit	0.50	\$60.00
10/24/2024	SJ	receipt and review courts notification re ltr to judge lemieux with certifications attached	0.20	\$24.00
10/24/2024	MRB	Correspondence with administration regarding certifications (x3)	0.30	\$58.50
10/24/2024	MRB	Preparation and review of file in anticipation of Court conference with Judge.	0.60	\$117.00
10/25/2024	MRB	Preparation and attendance at case management conference.	0.50	\$97.50
10/25/2024	MRB	Telephone conference with administration regarding case status.	0.20	\$39.00
10/25/2024	MRB	Draft language regarding court order with opposing counsel. Correspondence with opposing counsel.	0.70	\$136.50
10/25/2024	MRB	Correspondence with Court regarding order.	0.20	\$39.00
10/25/2024	MRB	Receipt and response to correspondence regarding eminent domain status and meeting.	0.20	\$39.00
10/25/2024	MRB	Telephone conference with developer counsel regarding status. Review status of Court order.	0.30	\$58.50
10/28/2024	MRB	Receipt and review correspondence regarding roundabout (x3)	0.30	\$58.50
10/28/2024	MRB	Receipt and review correspondence regarding meeting on proposed design changes.	0.20	\$39.00
10/31/2024	MRB	Conference with administration regarding litigation.	0.50	\$97.50

Billable Hours / Fees:	14.00	\$2,647.50
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10/31/2024
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Timekeeper Summary

Timekeeper MRB worked 12.90 hours at \$195.00 per hour, totaling \$2,515.50.

Timekeeper SJ worked 1.10 hours at \$120.00 per hour, totaling \$132.00.

Current Invoice Summary

Current Fees:	\$2,647.50
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	<u>\$2,647.50</u>

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Payment Due Upon Receipt.

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

August 02, 2024

Invoice No. 19779

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold
Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action
For Services Rendered from 4/1/2024 Through 7/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
7/1/2024	MRB	Receipt and response to correspondence from counsel for property developer. Review of order to show cause and filed documents.	0.50	\$97.50
7/2/2024	MRB	Receipt and review correspondence from developer's counsel.	0.20	\$39.00
7/2/2024	MRB	Receipt and review correspondence from administration regarding potential additional litigants.	0.20	\$39.00
7/11/2024	MRB	Preparation and filing regarding proof of service.	0.20	\$39.00
7/15/2024	MRB	Telephone conference with counsel for developer regarding OTSC and judicial orders. Review of file regarding updates to orders.	0.40	\$78.00
7/16/2024	MRB	Draft and submission of certification of service to Court.	0.30	\$58.50
7/17/2024	MRB	Receipt and review correspondence from counsel for Brookdale regarding intervening in eminent domain matter. Review of easement documents, appraisal and complaint.	0.80	\$156.00
7/17/2024	MRB	Review of appraisal. Research regarding taking, easement and underlying rights.	1.20	\$234.00
7/18/2024	MRB	Review of title report, utility easements and site plans. Conference regarding access easements.	0.80	\$156.00
7/18/2024	MRB	Correspondence with working group regarding access easement.	0.20	\$39.00

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8/2/2024
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7/18/2024	MRB	Telephone conference with counsel for Brookdale.	0.20	\$39.00
7/18/2024	MRB	Telephone conference with opposing counsel.	0.20	\$39.00
7/18/2024	MRB	Receipt and response to correspondence from opposing counsel. Review and analysis regarding order to show cause.	0.30	\$58.50
7/18/2024	MRB	Draft adjournment request.	0.20	\$39.00
7/18/2024	MRB	Telephone conference with Brookdale council regarding adjournment and settlement negotiations.	0.30	\$58.50
7/18/2024	MRB	Receipt and review correspondence from opposing counsel requesting amendments to briefing schedule.	0.20	\$39.00
7/18/2024	RHG	Review legal and procedural issues re: easements and taking.	0.30	\$58.50
7/18/2024	LNR	Review letter from the County.	0.20	\$39.00
7/18/2024	LNR	Conference call re Brookdale intervention.	0.50	\$97.50
7/19/2024	SJ	receipt and review courts notification re adjournment request re Reservior Road Paterson, LLC	0.20	\$24.00
7/19/2024	MRB	Research and analysis regarding condemnation of access easements.	2.30	\$448.50
7/19/2024	SJ	receipt and review courts notification re defendants request for new briefing scheduling dates	0.20	\$24.00
7/19/2024	MRB	Preparation and review of site plans, taking area and response to jurisdictional questions. Draft memorandum regarding valuation.	1.70	\$331.50
7/24/2024	SJ	receipt and review courts notification re order prepared by the court hearing will be on 9/13/24 in person (Reservoir road paterson)	0.20	\$24.00
7/24/2024	MRB	Receipt and review correspondence from Court regarding case management order. Review of amended case management order.	0.30	\$58.50
7/24/2024	MRB	Receipt and review correspondence from Court.	0.20	\$39.00
7/25/2024	SJ	receipt and review courts notification re hearing will be on 9/13	0.20	\$24.00
7/26/2024	MRB	Receipt and review motion to intervene filed by Brookdale.	0.50	\$97.50
7/26/2024	SJ	receipt and review courts notification Defendant Brookdale community college NOM to intervene	0.20	\$24.00
7/29/2024	SJ	receipt and review courts notification Motion to intervene will be decided	0.20	\$24.00

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Matter Number: 149-0001

8/2/2024
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7/29/2024	MRB	Receipt and review correspondence regarding Brookdale, County involvement and alternative egress. Review and preparation for telephone conference with County.	0.50	\$97.50
7/29/2024	MRB	Receipt and review correspondence from Court regarding motion to intervene.	0.20	\$39.00
7/29/2024	LNR	Conference call with County.	0.80	\$156.00
7/29/2024	MRB	Attendance at conference with County and engineers.	0.80	\$156.00
7/29/2024	MRB	Site visitation and review of proposed amendments to site plan.	0.70	\$136.50
7/31/2024	MRB	Review and analysis regarding additional taking, appraisal and engineering plans.	0.60	\$117.00
Billable Hours / Fees:			17.00	\$3,225.00

Timekeeper Summary

Timekeeper MRB worked 14.00 hours at \$195.00 per hour, totaling \$2,730.00.

Timekeeper LNR worked 1.50 hours at \$195.00 per hour, totaling \$292.50.

Timekeeper SJ worked 1.20 hours at \$120.00 per hour, totaling \$144.00.

Timekeeper RHG worked 0.30 hours at \$195.00 per hour, totaling \$58.50.

Current Invoice Summary

Current Fees:	\$3,225.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$3,225.00

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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

November 27, 2024

Invoice No. 20810

Township of Freehold
One Municipal Plaza
Freehold, NJ 07728

Client Number: 4738 Township of Freehold
Matter Number: 149-0001 FREEHOLD TWP Eminent Domain Action
For Services Rendered from 7/1/2024 Through 11/27/2024.

<u>Date</u>	<u>Timekeeper</u>	<u>Fees</u> <u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/30/2024	MRB	Receipt and response to correspondence from Court regarding case management order. Review of case management order.	0.30	\$58.50
10/30/2024	MRB	Receipt and response to correspondence from Brookdale counsel regarding case management order.	0.20	\$39.00
10/30/2024	MRB	Correspondence with administration and developer regarding case management order.	0.20	\$39.00
10/31/2024	MRB	Telephone conference with administration.	0.50	\$97.50
10/31/2024	SJ	Receipt and review courts notification re Order prepared by the court	0.20	\$24.00
11/1/2024	SJ	Receipt and review courts notification re CMC on 11/12.	0.20	\$24.00
11/1/2024	MRB	Receipt and review correspondence from Court.	0.20	\$39.00
11/1/2024	MRB	Receipt and response to correspondence from opposing counsel regarding notification to public entities.	0.20	\$39.00
11/4/2024	MRB	Correspondence with administration regarding meeting with public entities.	0.20	\$39.00
11/4/2024	MRB	Preparation and attendance at conference with developers, engineers and administration regarding taking.	1.20	\$234.00
11/4/2024	LNR	Conference call with client and Edgewood properties.	0.60	\$117.00

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Client Number: 4738
Matter Number: 149-0001

11/27/2024
Page: 2

11/5/2024	MRB	Draft stipulation of dismissal without prejudice. Correspondence with opposing counsel regarding ongoing negotiations.	0.80	\$156.00
11/5/2024	MRB	Receipt and review correspondence from Brookdale counsel regarding stipulation of dismissal.	0.20	\$39.00
11/7/2024	MRB	Receipt and review correspondence from opposing counsel regarding stipulation of dismissal.	0.30	\$58.50
11/7/2024	MRB	Telephone conference with administration regarding dismissal language.	0.20	\$39.00
11/7/2024	MRB	Receipt and response to correspondence from Brookdale counsel regarding stipulation.	0.20	\$39.00
11/7/2024	MRB	Research and analysis regarding abandonment of condemnation complaint.	0.50	\$97.50
11/7/2024	MRB	Receipt and response to emails from opposing counsel regarding attorney fees and costs (x4)	0.60	\$117.00
11/8/2024	MRB	Telephone conference with developer's counsel regarding dismissal without prejudice. Correspondence with counsel.	0.40	\$78.00
11/8/2024	MRB	Receipt and response to correspondence from opposing counsel regarding fees.	0.20	\$39.00
11/8/2024	MRB	Research and analysis regarding attorney fee provisions. Correspondence with developer counsel.	0.60	\$117.00
11/11/2024	MRB	Review case management order and court notices. Correspondence with developer counsel regarding stipulation of dismissal.	0.30	\$58.50
11/11/2024	MRB	Receipt and review correspondence from developer counsel.	0.20	\$39.00
11/11/2024	MRB	Draft stipulation of dismissal.	0.80	\$156.00
11/11/2024	MRB	Correspondence with Court regarding stipulation of dismissal.	0.20	\$39.00
11/11/2024	MRB	Telephone conference with developer's counsel regarding stipulation of dismissal.	0.30	\$58.50
11/12/2024	MRB	Receipt and response to correspondence from administration.	0.10	\$19.50
11/12/2024	MRB	Receipt and review correspondence from Court regarding stipulation of dismissal.	0.10	\$19.50
11/12/2024	SJ	Receipt and review courts notification re Stipulation of Dismissal. Case settled.	0.20	\$24.00
11/15/2024	MRB	Receipt and review correspondence from administration regarding taking maps. Telephone conference with administration.	0.50	\$97.50

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Client Number: 4738
Matter Number: 149-0001

11/27/2024
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11/20/2024	MRB	Receipt and review correspondence from Court regarding motion results.	0.20	\$39.00
11/20/2024	MRB	Receipt and response to correspondence from developer counsel regarding next steps.	0.20	\$39.00
11/21/2024	MRB	Receipt and review correspondence from developer counsel regarding eminent domain matters.	0.10	\$19.50
11/26/2024	MRB	Receipt and review correspondence from developer counsel	0.20	\$39.00

Billable Hours / Fees:	11.40	\$2,178.00
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Timekeeper Summary

Timekeeper MRB worked 10.20 hours at \$195.00 per hour, totaling \$1,989.00.

Timekeeper LNR worked 0.60 hours at \$195.00 per hour, totaling \$117.00.

Timekeeper SJ worked 0.60 hours at \$120.00 per hour, totaling \$72.00.

Current Invoice Summary

Current Fees:	\$2,178.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$2,178.00

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