Phone Number: 406-728-2911 Fax Number: 406-728-2912 EIN: 32-0051823

Invoice submitted to:

Seeley Lake Sewer District PO Box 403 Seeley Lake, MT 59868

June 30, 2020

In Reference To: SLS 17-00 Seeley Lake Sewer District (General Business) Submit Invoices via Email to: sbp@centric.net; jcurtiss53@gmail.com; slk2559@blackfoot.net

Invoice # 12214

Professional Services

		Hours	Amount
6/1/2020 JGB	Finalize correspondence to Goodover regarding mandatory sewer connection requirements in Missoula.	0.30	\$75.00
JGB	Review Goodover email regarding question on addressing putting out to bid on agenda and Curtiss position that Trondele must approve and need 100 people to agree to connection first.	0.20	\$50.00
SN	Factual research regarding Missoula City Ordinances #3336 and #2644 to determine language related to mandatory connection to sewer system in the City of Missoula.	0.40	\$36.00
SN	Finish drafting correspondence to the client regarding enforcement of mandatory sewer hookups in order to proceed with taking the project to bid following the dismissal of the litigation.	0.40	\$36.00
6/3/2020 JGB	Review Shaw email to Beal, Goodover, Curtiss and Myre regarding contracts forthcoming in next two weeks, DocuSign, TSEP Grant and establish system for receipt, processing and review.	0.30	\$75.00
6/5/2020 JGB	Review em from Fransisco/Sullivan with attached revised Pine Drive Agreement and respond requesting redline/strikeout to speed review of changes.	0.20	\$50.00
6/8/2020 JGB	Review email of Sullivan with attached redline version showing revisions and begin review of revisions.	0.50	\$125.00
6/9/2020 JGB	Correspondence to Goodover and Curtiss regarding TSEP contract and no further action being taken until advised otherwise; Review email from Pat regarding DocuSign.	0.50	\$125.00
JA	Research the current state of Montana law governing ultra vires actions of elected government officials in order to determine whether a decision by the Board not to pursue the sewer system project as it is currently designed and approved	1.00	\$195.00

THANK YOU FOR YOUR BUSINESS!

Invoice is due upon receipt. A service charge of 1% per month (12%APR) will be charged on all invoices not paid by the 1st of the month following the invoice date.

Seeley Lake Sew	er District	l	Page 2
		Hours	Amount
	pursuant to the District's Resolutions may subject individual directors to personal liability.		
6/10/2020 JGB	Review email of Curtiss regarding she accepts revisions and wants Goodover to sign before potential president change on Monday; review additional DocuSign email; review email of Goodover regarding availability to sign agreement; review Curtiss email regarding apology for not responding earlier and wants me to execute document using DocuSign.	0.60	\$150.00
6/11/2020 JGB	Review emails from Montana Department of Commerce regarding #MT-TSEP"-PL-21-190 "for signature" and attempt to access documents.	0.40	\$100.00
JGB	Review emails from Curtiss regarding provision of new attached agreement that goes with the certificate of authority she sent previously,WRDA/corps of engineers grant and county attorney Hart incorrectly listed as legal counsel with attached 5/19 email to other board members regarding same, forward of 6/8 email from Dillion that Curtiss did not attach to prior email to me.	0.50	\$125.00
6/12/2020 JGB	Review proposed revised Pine Drive and agreement and emails related to same from attorney Sullivan, Curtiss and Goodover.	0.80	\$200.00
JGB	Review email from Curtiss regarding execution of planning grant for phase 3 for the District's contract with Great West pursuant to Districts adopted budget with \$15,000 match; review Shaw email to Curtiss, et al regarding everyone must sign by DocuSign; Curtis email regarding getting review of TSEP contract on my schedule.	0.40	\$100.00
6/14/2020 JA	Revise letter to client setting forth the duties of existing and newly elected Board directors to include additional analyses regarding the directors' duties to pursue the design, construction, and installation of the public sewer system project as it is currently designed and approved pursuant to the District's duly adopted Resolutions.	0.80	\$156.00
6/15/2020 JGB	Revise and finalize letter to Goodover succinctly summarizing factual context and controlling legal concepts for new and existing board to ensure legal and ethical duties are understood and complied with.	0.90	\$225.00
JGB	Correspondence to Curtiss and Goodover regarding review of proposed revised Pine Drive Agreement.	0.30	\$75.00
JGB	Review message of Curtiss regarding she wants 4 original executed copies of the authorization for the WRDA grant; review email from Curtiss regarding form changed that she wants me to sign, inclusion of "whole deal"; review Curtiss email of 6:13 pm regarding "here is what we did" with attached board papers that were sent to attorney Semmens at 10:32 am that day.	0.50	\$125.00

Seeley Lake S	Sewer District		Page 3
		Hours	Amount
6/15/2020 JC	GB Begin substantive review and analysis of contract documents and emails from Curtiss forwarding documents she previously did not provide and outline issues to be addressed by Board before execution.	2.50	\$625.00
٩L	A Factual research of District Manager Jean Curtiss' June 15, 2020 correspondence to the Board re: its authorization to move forward with the project.	0.10	\$19.50
ĄĻ	A Factual research of issues raised during the 2020-06-15 Board Meeting, including statements made by directors regarding the sewer system project as it is currently planned and approved, the Board's election of director Tom Morris as Board President, and the Board's attempt to appoint director Morris as the spokesperson with the District's legal counsel, in order to determine what actions the District must take in order to comply with its ethical and legal duties for continued representation of the Board in general business matters. L129	1.20	\$234.00
12	N Finish drafting correspondence to the client regarding the statement of District board director duties and recommendation regarding election of board officers to include factual statements relating to the history of the District and revisions requested by Jon Beal.	0.50	\$45.00
SI	N Continue drafting correspondence to the clients regarding the WRDA Grant authorization by Jon Beal as counsel to the District to include revisions requested by Jon Beal.	0.20	\$18.00
18 N	N Factual research regarding the District's position and June 15, 2020 status update with respect to the ongoing litigation, assessment methodology, future adoption of resolution #08062020, seating of new board directors, election of new board officers, and legal guidance for proceeding following the dismissal of the litigation and seating of new board directors, which includes plaintiff Tom Morris.	1.20	\$108.00
RF	R Begin drafting a letter to the clients regarding Jon Beal's review and analysis of the Pine Drive Agreement, the Agreement Between the Department of the Army and Seeley Lake Sewer District, and the Montana Department of Commerce Treasure State Endowment Program Contract.	0.60	\$48.00
6/16/2020 JG	BB Draft correspondence to Board members Goodover, Hill, and Hutchinson regarding readily apparent conflict of interest and legal compliance issues in requesting and utilizing taxpayer funds for the designed and approved sewer works project that is opposed by the majority of the Board and request to address legal compliance issues.	3.00	\$750.00
JG	GB Analysis of conflict of interest issues and legal compliance requirements vis a vis election and installment of officers opposed to project as designed and approved, and contractual	1.80	\$450.00

Seeley Lake Sewer District			Page 4
	-	Hours	Amount
	requirements that I have been requested to review, approve and certify to prepare letter to the Board.		
6/16/2020 JA	Draft addition to letter to client regarding WRDA and TSEP grant documents that analyzes why our firm is unable to communicate with directors Tom Morris and Jason Gilpin in light of the Mont. R. Prof. 4.2 and the Board's legal and ethical duties to pursue the public sewer system project pursuant to its duly adopted Resolutions, which further preclude communication with directors who have publicly opposed the system as designed and approved.	0.40	\$78.00
JA	Draft addition to letter re: review of the WRDA and TSEP documents to include additional analyses of the Board's authority to enter into contracts affirming compliance with Montana law existing at the time of the contract in light of the stated intent and purpose of the majority of the Board not to pursue the system as planned and approved pursuant to the District's duly adopted Resolutions.	0.70	\$136.50
SN	Continue drafting correspondence to the clients regarding the resignation of Beal Law Firm, PLLC as business counsel for the District to include reference to the file closure and termination of representation letter and copies of documents being provided electronically from the District's file.	0.90	\$81.00
SN	Factual research regarding exhibits to correspondence to the clients regarding the TSEP Grant Contract and WRDA Grant authorization review and execution by Jon Beal as counsel to the District.	0.70	\$63.00
SN	Finish drafting correspondence to the clients regarding the TSEP Grant Contract and WRDA Grant authorization review and execution by Jon Beal as counsel to the District to include language relating to the existing conflict of interest, duties and purpose of the District and additional revisions requested by Jon Beal.	1.70	\$153.00
RR	Factual reserach on statements made by attorney Dan Semmens during the June 15, 2020 Seeley Lake Sewer District Board Meeting regarding the authority of the new Board and tasks that need to be completed by Seeley Lake Sewer District in order to move forward with financing for attorney review.	0.80	\$64.00
KJ	Close file according to office policy. Create electronic file for scanned documents; Review Insert Index to determine which documents are to be retained by BLF, returned to the Client, or destroyed; Prepare documents for scanning; Scan and save 0 pages of documents; Prepare and finalize Affidavit of Scanning; Prepare and Finalize Document Return Letter and send documents to Client; Box documents to be retained by BLF, and update office indexes accordingly; Remove all electronic and paper deadline reminders.	2.20	\$176.00

Seeley Lake Sewer District			Page 5
		Hours	Amount
6/17/2020 JGB	Review emails from Mike Boltz regarding Larson interference with director election; finalize resignation correspondence.	0.30	\$75.00
SN	Finish drafting correspondence to the clients regarding the resignation of Beal Law Firm, PLLC as business counsel for the District and the file closure and termination of representation letter and copies of documents being provided electronically from the District's file.	0.40	\$36.00
6/18/2020 JGB	Review Curtiss email with inaccurate statements, have correct and accurate emailed information compiled and finalize response to Curtiss correcting her misstatements.	0.50	\$125.00
JGB	Finish drafting letter requested by Goodover summarizing conference and issues facing the board with respect to sewerworks project and pending litigation completion.	2.80	\$700.00
AL	Revise letter to Pat Goodover analyzing reasons for resignation as general counsel of the District to include additional analyses of why continuing to represent the District in light of the election of adverse Board directors, including a plaintiff in DV-18-913 and DV-20-135, who are adverse to the public sewer system as it is currently designed and approved is legally and ethically inappropriate.	0.50	\$97.50
SN	Finish drafting correspondence to Pat Goodover regarding a summary of his June 17, 2020 conference with Jon Beal related to conflict of interest issues, resignation as counsel and completion of outstanding work.	1.20	\$108.00
SN	Factual research regarding Jean Curtiss' incorrect and dishonest statements relating to Jon Beal's review of the TSEP Grant Application documents; compile all communications related to review of the TSEP Grant Application documents to document the firm's efforts to request direction on what action was required and the clients' failure to provide direction until less than 3 business days prior to the deadline for execution and failure to acknowledge significant risk issues involved in executing the same.	0.40	\$36.00
6/24/2020 SN	Finish drafting correspondence to the clients regarding verification of Jon Beal's declination to sign the TSEP Grant Application with attached confirmation showing the declination verification.	0.20	\$18.00
6/26/2020 JGB	Review Hill letter regarding board's acceptance of BLF resignation from general business file, dismissal of declaratory action and direction to complete Larson litigation.	0.10	\$25.00
For	professional services rendered	33.90	\$6,292.50

Seeley Lake Sew	er District					Page 6
Additio	onal Charges :					
						Amount
6/24/2020 Copyi	ng/Printing costs	302 pages at \$0	.15 per page.			45.30
Posta	ge costs 1 at \$8.7	70.				8.70
Tota	al additional cha	arges			-	\$54.00
Tota	al amount of this	s bill				\$6,346.50
Pre	vious balance					\$583.80
BAI	ANCE DUE					\$6,930.30
Current	30 Days	60 Days	90 Days	120 Days	180 Days	210 Days

Current	30 Days	60 Days	90 Days	120 Days	180 Days	210 Days
6,346.50	583.80	0.00	0.00	0.00	0.00	0.00

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Seeley Lake Sewer District

Timekeeper Summary					
Name	Hours	Rate	Amount		
Jacob Anderson	4.70	195.00	\$916.50		
Jon G. Beal	17.40	250.00	\$4,350.00		
KARA JENKINS	2.20	80.00	\$176.00		
Renee Roragen	1.40	80.00	\$112.00		
Shaelynn Neel	8.20	90.00	\$738.00		

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121 Hickory St., Suite 4 Missoula, MT 59807-8898 PO Box 8898

> 406-728-2911 Phone Number: Fax Number: 406-728-2912 EIN: 32-0051823

Invoice submitted to:

Seeley Lake Sewer District PO Box 403 Seeley Lake, MT 59868

June 30, 2020

In Reference To: SLS 20-01 Seeley Lake Sewer District (Decl Judgment Action) Submit invoices via email to sbp@centric.net; jcurtiss53@gmail.com; slk2559@blackfoot.net

Invoice # 12215

Professional Services

		Hours	Amount
6/4/2020 JGB	Review Goodover email with attached thoughts on SLSD Board declaratory judgment complaint he wants filed before the 6/15 board meeting.	1.00	\$250.00
6/7/2020 JGB	Begin analysis and initial outline of Declaratory Judgment complaint facts and legal theories for additional research and drafting by associate and paralegal.	3.00	\$750.00
6/9/2020 JGB	Telephone conference with Goodover regarding declaratory judgment action he wants filed; update draft outline of facts and legal issues to address for factual and legal research to be completed by associate.	2.10	\$525.00
JA	Research the current state of Montana law governing the doctrine of laches to determine whether the doctrine may apply to prevent newly-elected Board directors Tom Morris and Jason Gilpin from taking action to prevent the District from pursuing its adopted Resolutions for the design, installation, and construction of the sewer system as it is currently planned and approved in order to state an actionable claim in the Complaint and request for declaratory judgment.	1.20	\$234.00
JA	Research the current state of Montana law governing declaratory judgment actions in order to determine what facts and law must be alleged in the Complaint in order for the District to state an actionable and justiciable claim for declaratory judgment.	1.50	\$292.50
JA	Research the current state of Montana law governing collateral estoppel to determine whether Defendant Tom Morris is collaterally estopped from denying allegations of fact and law set forth in the Complaint and request for declaratory judgment that were previously deemed admitted in DV-18-913 as a result of his failure to respond to discovery and to respond to the District's Rule 37 motion in that case.	1.00	\$195.00

THANK YOU FOR YOUR BUSINESS!

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Seeley Lake Sew	ver District		Page 2
	_	Hours	Amount
6/9/2020 JA	Research the current state of Montana law governing the doctrine of res judicata to determine whether the doctrine bars Defendant Tom Morris from re-litigating and/or challenging deemed admissions of the District's allegations of fact and law in DV-18-913, resulting from Morris' failure to respond to discovery and to respond to the District's Rule 37 motion in that case, for the purpose of conclusively establishing those issues in the present case as set forth in the Complaint and request for declaratory judgment.	1.00	\$195.00
JA	Research the current state of Montana law governing the law of the case doctrine to determine whether Defendant Tom Morris' deemed admissions of the District's allegations of fact and law in DV-18-913, resulting from his failure to respond to discovery and to respond to the District's Rule 37 motion in that case, are also conclusively established in the present case by the law of the case doctrine for the purpose of alleging facts and law in the Complaint and request for declaratory judgment.	0.90	\$175.50
6/10/2020 JGB	Analysis and update Declaratory Judgment Complaint outline to address additional legal requirements of board members, potential objections to avoid admissions, exhibit list, service timing and issues; retainer agreement and conflict issues to address with Goodover, verification of complaint; allegations; how to handle complaint allegation amendments pending meeting actions at 6/15 meeting; review Goodover's approval for cost of expedited service fee for service of complaint on Tuesday and status of Derry's confirmation of work locations for Morris and Gilpin; review Goodover email regarding executed complaint verification signature pages for complaint and potential amended complaint; analyze and update initial complaint draft for further work by associate and paralegal; analysis of hearing transcript for quotes, Judge Deschamps opinion and Judge Halligan opinions and statements to be added to complaint; review Botz message regarding Larson told tenants, including Boltz's son that if he voted for the sewer is rent would increase \$180 and have paralegal attempt to get actual documents for inclusion in complaint; finalize retainer agreement for new matter.	9.30	\$2,325.00
JA	Draft portion of Complaint setting forth comprehensive allegations regarding Defendants' Tom Morris' and Jason Gilpin's election to the Board and public statements reflecting their intent not to pursue the project as it is currently planned and approved pursuant to the District's duly adopted Resolutions and Bylaws in order to establish an actionable and justiciable controversy for the Court to adjudicate the declaratory judgment action.	0.70	\$136.50
JA	Draft portion of Complaint setting forth comprehensive allegations regarding the history and formation of the District, the nitrate contamination in Seeley Lake's groundwater, the statutory authority and duties of the District and its governing Board to pursue a sewer system in order to alleviate that	1.30	\$253.50

Seeley Lake Sev	ver District		Page 3
		Hours	Amount
	pollution to preserve the public health, and the Resolutions adopted by the District to that effect.		
6/10/2020 JA	Draft portion of Complaint setting forth comprehensive allegations regarding the affects of Defendant Tom Morris' litigation in DV-18-913 and DV-20-135 on the public sewer system project, including the increased costs to the project caused by his and his fellow-plaintiffs' and their counsel's actions, in order to provide factual and legal support for the District's position that it has been, and will continue to be harmed, if declaratory judgment is not granted prohibiting Morris and Gilpin from taking actions as Board directors to stop or delay the project as it is currently designed and approved.	1.00	\$195.00
JA	Draft portion of Complaint setting forth comprehensive allegations regarding each actionable and justiciable controversy subject to adjudication by declaratory judgment, including facts and law regarding the District's and its governing Board's duties to: (1) pursue a clean and healthful environment pursuant to Mont. Const. Art. II, §3; (2) to abate and prevent the further pollution of Seeley Lake's groundwater pursuant to MCA Title 75; (3) to comply with the Districts' duly adopted Resolutions and associated Bylaws provisions for the project; (4) to avoid taking actions that stop or delay the project; (5) to comply with statutory public trust and fiduciary duties pursuant to MCA §2-2-103(1); (6) personal liability for ultra vires acts taken without authorization by the District and/or applicable law; (7) to avoid conflicts of interest with the District's counsel pursuant to Montana law created by Defendants Tom Morris' and Jason Gilpin's election to the Board; and (8) to avoid improper disclosure and waiver of the District's attorney-client privileged communications with its counsel created by Morris' and Gilpin's election to the Board.	2.50	\$487.50
JA	Draft portion of Complaint setting forth comprehensive series requests for declaratory relief to the Court with respect to each of the actionable and justiciable controversies alleged therein, for attorney fees and costs under MCA §§27-8-311 and -313, and for such further relief as the Court deems just and proper.	2.70	\$526.50
SN	Communicate with Pat Goodover regarding a request for authorization for the Equity Process Management service fee of \$200.00 to serve Tom Morris and Jason Gilpin in Seeley Lake, Montana; confirm authorization by Pat Goodover.	0.10	\$9.50
SN	Begin drafting correspondence to Equity Process Management regarding rush service of the Complaint and Summons to Tom Morris and Jason Gilpin.	0.20	\$19.00
SN	Continue drafting the factual portion of the Complaint and Request for Declaratory Judgement to include pertinent language from the District's Statement of Undisputed Facts in DV-18-913.	0.40	\$38.00

Seeley Lake Sewer District Page 4 Hours Amount 6/10/2020 SN Finish drafting the Addition of New Matter Retainer Agreement 1.00 \$95.00 to include language related to attorney-client privilege and conflict of interest issues and to include revisions requested by Jon Beal. SN Communicate with Felicity Derry regarding questions related to 0.20 \$19.00 newly seated board members to verify their physical home and work addresses for service of the Complaint. SN Communicate with Jeri at Equity Process Management to 0.20 \$19.00 request quote for rush service of two individuals in Seeley Lake, Montana and confirm availability to complete service on Tuesday, June 16, 2020. SN Draft verification pages for Pat Goodover to be appended to the 0.30 \$28.50 finalized and approved Complaint and Amended Complaint, RR Draft of Retainer Agreement for attorney's review and 1.60 \$152.00 finalization. Run conflict checks and business entity searches as needed. Create insert index, organize documents and create corresponding files. Analyze factual record: board meeting minutes, TSEP program 6/11/2020 JGB 8.50 \$2,125.00 ranking, client and Rural Development information, record of consideration of alternatives to a centralized community system, Robertson statements on competitiveness of TSEP program for potential additions to complaint; draft and revise complaint and client letter on risks; review message of Derry regarding concerns over election of Morris as president and whether I will give guidance to the board; review Goodover email with executed retainer agreement; review Goodover email with comments and revisions on draft complaint; analysis of removal of res judicata argument. JA Research the current state of Montana law governing legal 0.80 \$156.00 bases for the recovery of attorney fees and costs in order to apprise the client of potential means of recovery by Defendants Tom Morris and Jason Gilpin if the Court dismisses the Complaint and/or decides the case in Defendants' favor. JA Research the current state of Montana law governing claims for 1.30 \$253.50 malicious prosecution in order to apprise the client of potential risks of filing and serving the Complaint and request for declaratory judgment on Defendants Tom Morris and Jason Gilpin, including potential claims for malicious prosecution if the Court dismisses the Complaint and/or adjudicates it in favor of Defendants. JA Pursuant to Jon Beal's direction research adverse law and draft 1.90 \$370.50 portions of letter to client analyzing Complaint and request for declaratory judgment, the claims raised therein, and the risks associated with filing and serving the Complaint.

Seeley Lake Sev	ver District		Page 5
		Hours	Amount
6/11/2020 SN	Communicate with Pat Goodover regarding a follow-up request for execution of the Addition of New Matter Retainer Agreement; confirm draft Complaint will be provided for his review today and will be filed immediately upon his approval.	0.10	\$9.50
SN	Factual research regarding exhibits to the Complaint and Request for Declaratory Judgement.	0.30	\$28.50
SN	Factual research regarding the legal portion of the Complaint and Request for Declaratory Judgement to confirm all legal concepts requested by Jon Beal to be included are addressed with supporting statements and/or exhibits.	0.50	\$47.50
SN	Continue drafting correspondence to Equity Process Management regarding rush service of the Complaint and Summons to Tom Morris and Jason Gilpin to include confirmed home and work addresses and references to photographs of the individuals for the process server's ease in identifying the individuals.	0.20	\$19.00
SN	Begin drafting electronic filing submission of the District's Complaint; draft new civil case filing; and manually add all parties to the action with contact and representation information pursuant to Missoula County's electronic filing procedure.	0.40	\$38.00
SN	Communicate with former Board director and president Mike Boltz regarding a request for documentation related to his complaint against Don Larson with the Commissioner of Political Practice; confirm he will try to send us emails with Commissioner of Political Practice and copy of letter sent to tenant by Don Larson.	0.10	\$9.50
SN	Draft correspondence to the client regarding the draft Complaint and Request for Declaratory Judgement for their review and approval.	0.60	\$57.00
SN	Communicate with Felicity Derry regarding confirmation of Tom Morris and Jason Gilpin's home and work addresses.	0.20	\$19.00
SN	Draft Summonses to defendants Tom Morris and Jason Gilpin.	0.30	\$28.50
SN	Finish drafting the factual portion of the Complaint and Request for Declaratory Judgement to include pertinent language from the District's Statement of Undisputed Facts in DV-18-913.	1.50	\$142.50
6/12/2020 JGB	Legal research regarding additional theories based on judicial and equitable estoppel and facts in record supporting same and revise complaint and prayer for relief; draft and revise letter to Goodover regarding revised complaint based on his input and additional factual and legal research; telephone conference with Goodover regarding revised complaint authorized all changes, filing same today and serving on Tuesday, after board meeting (or serving amended complaint depending on what happens at board meeting); review emails from Court confirming filing, approval/acceptance of filing and assignment of Judge Halligan	7.50	\$1,875.00

Seeley Lake Sewer District			Page 6
		Hours	Amount
	to case; telephone conference with Pat regarding assignment of Judge Halligan and ability of other side to have her removed without cause.		
6/12/2020 JA	Draft additions to Complaint setting forth: allegations regarding the intentions of Defendants Tom Morris and Jason Gilpin to prevent, hinder, and/or delay the design, construction, and installation of the public sewer system project as it is currently planned and approved, pursuant to each Defendants' public statements; affirmative allegations that Defendants are judicially and/or equitably estopped from taking positions contrary to the law and facts deemed well-taken and conclusively established in the related DV-18-913 and DV-20-135 litigations; and additional requests for declaratory relief judicially and/or equitably estopping Defendants from taking any action to prevent, hinder, and/or delay the project.	1.20	\$234.00
SN	Finish drafting Summonses to defendants Tom Morris and Jason Gilpin.	0.10	\$9.50
SN	Begin drafting correspondence to the client regarding the revised draft Complaint for his review and approval.	0.20	\$19.00
SN	Draft correspondence to Tom Morris and Jason Gilpin regarding litigation hold and preservation of evidence.	0.40	\$38.00
SN	Finish drafting electronic filing submission of the District's Complaint pursuant to Missoula County's electronic filing procedure.	0.40	\$38.00
SN	Continue drafting the District's Complaint to include numerical list of requested relief items and pursuant to revisions requested by Jon Beal.	0.50	\$47.50
6/15/2020 JGB	Review and follow up on summonses needed for service of complaint received in afternoon; have rush service canceled due delay in clerks issuance of summons.	0.50	\$125.00
JA	Factual research of issues raised during the 2020-06-15 Board Meeting, including statements made by directors regarding the sewer system project as it is currently planned and approved, and the Board's decisions with respect to pursuing grants for the project as it is currently planned and approved, in order to determine the effect of the new Board's position with respect to the current system and its effect on the instant litigation. L129	1.10	\$214.50
SN	Communicate with clerk of court Donna regarding a follow-up on the signed and sealed summonses to Tom Morris and Jason Gilpin; confirm summonses are being signed and returned this morning for service.	0.20	\$19.00
SN	Draft correspondence to attorney Colleen Dowdall regarding litigation hold and preservation of evidence.	0.20	\$19.00

Seeley Lake Sewer District Page 7 Hours Amount 6/15/2020 SN Factual research regarding the District's position and June 15, 1.20 \$114.00 2020 status update with respect to the ongoing litigation, assessment methodology, future adoption of resolution #08062020, seating of new board directors, election of new board officers, and legal guidance for proceeding following the dismissal of the litigation and seating of new board directors. which includes plaintiff Tom Morris. 6/16/2020 JGB Review message of Goodover regarding holding off on service 1.40 \$350.00 of complaint until he and I speak further; telephone conference with Goodover regarding he should provide complaint to Hutchinson and Hill for input before service and provide him the requested partial transcript form the meeting regarding authorization of additional court action; review filing receipt/invoice from court: review Goodover email asking to have Curtiss taken off the email list; review message of Goodover confirming he is sending complaint to board members Hutchinson and Hill. SN Communicate with Equity Process Management regarding 0.10 \$9.50 cancellation of rush service to Seeley Lake for service of Complaint and Summonses to Tom Morris and Jason Gilpin. SN Communicate with client regarding confirmation the complaint \$9.50 0.10 is being sent to all board members for their review. 6/17/2020 JGB Review emails of Goodover regarding Pathfinder inquiry; emails 2.00 \$500.00 from Goodover to Hill, Hutchinson regarding declaratory judgment action; Goodover emails regarding dismissal of declaratory judgment action, continuing to defend the board and fees claim; telephone conference with Goodover regarding same; pursuant to Goodover request, draft correspondence summarizing conference. 6/23/2020 JGB Review message of Goodover regarding directing to dismiss 0.50 \$125.00 case; finalize motion and file closure letter. JA Draft Rule 41 Notice of Dismissal Without Prejudice. 0.70 \$136.50 SN Communicate with Felicity Derry regarding her question related 0.20 \$19.00 to execution of the file closure letter; confirm both file closure letters sent to the Board must be executed and return to our office; send additional copies of file closure letters to Felicity Derry so that she may obtain the required signatures and ensure copies to returned to the firm with originals by U.S. mail. SN Communicate with Pat Goodover regarding confirmation of 0.10 \$9.50 receipt of his email regarding the withdrawal of the Declaratory Judgement action; inform him that a Rule 41 Notice of Withdrawal is being filed this morning. RR Draft electronic filing submission of Rule 41 Notice of Voluntary 0.10 \$9.50 Dismissal Without Prejudice pursuant to the Missoula County

electronic filing procedure.

Seeley Lake Sewer District			Page	8
	-	Hours	Am	ount
6/25/2020 SN	Factual research regarding all communications with Pat Goodover from May 4, 2020 to date to document his instruction and authorization to prepare and file the Declaratory Judgement action on behalf of the District.	0.40	\$3	8.00
KJ	Close file according to office policy. Create electronic file for scanned documents; Review Insert Index to determine which documents are to be retained by BLF, returned to the Client, or destroyed; Prepare documents for scanning; Scan and save 0 pages of documents; Prepare and finalize Affidavit of Scanning; Prepare and Finalize Document Return Letter and send documents to Client; Box documents to be retained by BLF, and update office indexes accordingly; Remove all electronic and paper deadline reminders.	0.40	\$3	8.00
For professional services rendered		69.40	\$14,22	2.00
Additi	onal Charges :			
6/12/2020 Missoula County District Court filing fee for Verified Complaint and Summo			12	6.00
6/24/2020 Copying/Printing costs 2 color pages at \$2.00 per page.				4.00
Copying/Printing costs 223 pages at \$0.15 per page.			3	3.45
Total additional charges			\$16	3.45
Total amount of this bill			\$14,38	5.45
BALANCE DUE			\$14,38	5.45

Seeley Lake Sewer District

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s Rate	Amount
0 195.00	\$4,056.00
0 250.00	\$8,950.00
0 95.00	\$38.00
0 95.00	\$161.50
95.00	\$1,016.50