

LANGDON LAW LLC  
Updated Timesheet for David R. Langdon  
*CCV v. Upper Arlington Public Library*

**Professional Services:**

<i>Date</i>	<i>Work Performed</i>	<i>Time</i>
18-Feb	Meeting with David Miller regarding potential case against Library (.1)	0.1
20-Feb	Meeting with David M. regarding Upper Arlington situation (.1)	0.1
22-Feb	Correspond with Tim Chandler regarding UA and UT lawsuits (timing, etc.) (.2); telephone conference with Tim regarding same (.6); correspond with David M. regarding same and review denial letter from UA (.2)	1.0
25-Feb	Meetings with David regarding library lawsuit (.2); review file and draft correspondence to Tim Chandler regarding same (.3)	0.5
26-Feb	Review correspondence from Tim regarding draft of pleadings, etc. (.1); review Complaint (.8)	0.9
27-Feb	Telephone conference with ADF counsel regarding case (.2); correspond with Tim (numerous) regarding timing of filing, phv motions, PI motion, etc. (.4); several meetings with client (David) regarding complaint, timing of filing, etc. (.4); review and revise complaint (2.4); telephone conference with Barry (and David) regarding complaint (discussions with Library, etc.) (.1)	3.5
28-Feb	Continue to review and revise complaint <a href="#">(4.1)</a> ; correspond and telephone conference (.6) with Tim throughout the day regarding same (my proposed changes, EC claim, compensatory or just nominal damages, timing of filing, etc.); correspond with Doug Napier of ADF regarding review of complaint on behalf of ADF, etc. <a href="#">(.3)</a> ; correspond and telephone conferences with Jeff Shafer of ADF regarding complaint (Est. Cl. issues) <a href="#">(.7)</a> ; meeting with David regarding complaint <a href="#">(.2)</a> ; correspond with Barry <a href="#">Sheets</a> regarding complaint <a href="#">(.2)</a> ; dinner meeting with David <a href="#">Miller and Doug Napier of ADF regarding case strategy, complaint, etc.</a> (1.5)	7.6
29-Feb	Review Shafer email regarding EC issues (.1); correspond with BMP regarding same (.1); telephone conference with Barry regarding complaint (correction) (.1); draft correspondence to Tim and KT and Doug regarding status of complaint, timing, etc. (.1); review correspondence in response to same (several) (.1); review correspondence from ADF media and review draft press release <a href="#">(n/c)</a> (.1)	0.56
3-Mar	Correspond with Doug, et al., regarding complaint, timing of filing, etc. (.2); review and revise PI memorandum (1.5); correspond with Tim regarding same (multiple) (.3); meeting with David regarding timing of filing, etc. (.2)	2.2
4-Mar	Correspond with Tim regarding complaint (.1); continue with final revisions to complaint, PI mtn/memo (2.9); correspond with Barry regarding complaint (.1)	3.1
5-Mar	Draft final revisions to complaint and telephone conference with Barry regarding same (2.2); draft final revisions to PI motion and memo (1.1)	3.3

6-Mar	Contemplate strategic issues for complaint and PI memo (religious speech/conduct distinction and religious meeting/service distinction) and correspond with Tim regarding same (1.8); meeting with David regarding same and status of complaint (.2); telephone conference with Tim regarding same (.8); review and revise complaint/memo (.5); online training for ECF filing of complaint ( <a href="#">n/c</a> .3); finalize complaint and prepare same for overnight filing (1.2; <a href="#">n/c for .9</a> ); correspond with co-counsel regarding same (.3)	<del>3.95</del>
7-Mar	Review docket (.1); correspond with client regarding filing (.1); correspond with co-counsel regarding same and Judge Smith (.2); correspond with Tim regarding other filings (PHV motions, PI motion, etc.) (.2); correspond (throughout the day) w/ Michele regarding same, service issues, etc. (.6); telephone conference with David M. (x2) regarding Judge Smith and possible local (Columbus) counsel (.3)	1.5
10-Mar	Telephone conference with Patrick Picinnini re representation of UA (.3); correspond with Barry regarding contact from Bryce Kurfees (.1); review media reports re complaint filing (.1); correspond with Michele regarding initial filing (.1); meeting with David regarding Kurfees (.1)	0.6
11-Mar	Research Judge Smith's webpage (.1); review local rules regarding preliminary conference for PI (.1)	0.2
14-Mar	Correspond with Barry regarding contact initiated by Bryce Kurfees	0.1
17-Mar	Telephone conference with JAS regarding status of case, etc. (.2)	0.2
19-Mar	Correspond with Barry regarding email to Bryce Kurfees (.1); draft correspondence to Tim regarding same and radio silence from Library (.1)	0.2
25-Mar	Telephone conference with David and Barry regarding Ch. 10 interview; follow up telephone conference with Barry regarding same; correspond with Tim and media dept regarding same (.3 for all media); telephone conference with Stephanie at Judge Smith's chambers regarding status and preliminary telephone conference (.2); correspond with Tim regarding same (.1)	0.3
3-Apr	Review Order regarding telephone conference (.1); correspond with Tim regarding contacting defendant (.1)	0.2
4-Apr	Correspond with Tim regarding service issues (.2)	0.0
7-Apr	Telephone conference with Tim regarding conference call on Thursday, service issues (.1)	0.1
8-Apr	Correspond with Tim regarding service	0.0
10-Apr	Telephone conference with Tim re preparation for conference call w/ court and follow up email to Tim (.3); telephone conference with court re scheduling for PI (.3); meeting with client re same and discovery, etc. (1.5)	2.1
11-Apr	Review Library's discovery requests (.2) and correspond with Tim regarding same (.2)	0.4
16-Apr	Telephone conference with Tim Chandler regarding discovery responses and PI (timing) strategy (.3)	0.3

21-Apr	Review correspondence from Tim regarding discovery responses (x2) (.1); draft correspondence to Tim and David regarding same (.1)	0.2
22-Apr	Correspond with Tim regarding discovery responses (.1)	0.1
23-Apr	Correspond with David (multiple times throughout the day) regarding discovery responses (.4); correspond with Tim regarding same (.1); review and revise draft of discovery responses (.5) and draft correspondence to Tim regarding same (.1); correspond with Bruce Purdy regarding same (.2); review and revise discovery responses per changes from Bruce and David (.3)	1.6
24-Apr	Meeting with client regarding discovery responses (1.0); review and finalize same (.1); draft correspondence to counsel regarding same (.1)	1.2
8-May	Correspond with Tim regarding PI posture, etc. (.1)	0.1
9-May	Review ECF entry re Notice of Pretrial conference ( <a href="#">n/c</a> )	0.04
13-May	Review Defendant's Memo in Opposition to Motion for PI	0.4
22-May	Correspond with Tim regarding reply brief (.1)	0.1
27-May	Review Reply Memorandum and correspond with Tim regarding same	0.3
29-May	Telephone conference with Barry regarding status, when to expect decision, etc. (.2)	0.2
2-Jun	Correspond with Tim regarding meet and confer conference with opposing counsel	0.1
4-Jun	Telephone conference with Tim in preparation for conference call with opposing counsel (.4) and follow up call regarding same (.1)	0.5
10-Jun	Telephone conference with Tim regarding discovery schedule	0.1
12-Jun	Review correspondence from Tim regarding 26(f) report, review same and draft correspondence to Tim re same (.2)	0.2
23-Jun	Meeting with David regarding call from reporter	0.0
24-Jun	Correspond with Tim and Kevin regarding UA preliminary pretrial conference on Weds (.1)	0.1
25-Jun	Review correspondence from Tim regarding pretrial conference (.1)	0.1
16-Jul	Review vm from Chelsea at Judge Smith's court; review correspondence from Michele regarding same and left vm for Chelsea (.2)	0.2
17-Jul	Telephone conference with Chelsea at Judge Smith's chambers re consolidation of PI motion with trial on merits (.2); correspond with Kevin and Tim regarding same (.3); meeting with David Miller regarding same (.5)	1.0
22-Jul	Correspond with Tim regarding consolidation	0.1
12-Aug	Telephone conference with Tim regarding status/strategy, initial disclosures (.2); review correspondence from Tim and Angel's response re same (.1); review correspondence from Tim re initial disclosures, and Angel's response (.1)	0.4

13-Aug	Review correspondence from Tim re decision expected soon (.1)	0.1
14-Aug	Meeting with BMP to discuss case, strategy, etc. (.1); review decision and opinion granting preliminary and permanent injunction and correspond with clients and co-counsel regarding same (1.0); media re same ( <a href="#">n/c</a> .4)	1.1
19-Aug	Review and respond to correspondence from Michele re fee application issues (.2)	0.2
20-Aug	Correspond with KT regarding postpone fee application until after appeal (.1)	0.1
21-Aug	Meeting with David regarding event on the 25th (.1); correspond with Tim regarding fee application (reasonable rate for him, etc.) (.2)	0.2
25-Aug	Draft correspondence to Sue and Angel regarding CCV event and appeal (.4); review correspondence from Angel in response and draft correspondence to co-counsel regarding same and attorney fee application (.1); forward Angel's email to clients ( <a href="#">n/c</a> .1); correspond with Tim, Michele and Kevin re attorney fee application, expert witness for rates, etc. (.9); correspond with WMT regarding serving as expert witness (.4); correspond with clients re event (.1)	1.78
27-Aug	Correspond with Tim re attorney fee motion and reasonable rates (.2.)	0.2
28-Aug	Telephone conference with Tim regarding attorney fee motion, proposed order re final judgment (.1)	0.1
29-Aug	Review our Attorney Fee motion and draft correspondence to opposing counsel regarding their interest in discussing settlement of same (.2); review response and correspond with Tim regarding same (.2)	0.4
2-Sep	Research attorney fee issues (reasonableness of rates - evidentiary or legal issue?) (.2); draft correspondence to opposing counsel re same and draft correspondence to Tim re same (.2); correspond with WMT re status of fee motion/expert testimony, schedule (.1); review correspondence from WMT re same (.1)	0.6
4-Sep	Correspond with Tim re brief and evidence in support of fee motion (.2); correspond with WMT re expert testimony (.1)	0.3
5-Sep	Review correspondence from Angel re settlement (.1); draft correspondence to Tim re same (.1); telephone conference with Chelsea re extension of time to file brief in support of mtn for atty fees (.2); draft correspondence to WMT re same (.1); draft correspondence to Angel re stipulation (.1)	0.6
9-Sep	Correspond with Tim re stipulation, message from Sue and Angel (.1)	0.1
12-Sep	Correspond with Tim re Library's fee offer, rates, expert, etc. (.2); telephone conference re expert affidavit (.2)	0.4
16-Sep	Review Library's objections to proposed final judgment order (.1); review settlement proposal letter from opposing counsel (.1)	0.2
17-Sep	Draft Declaration of DRL in support of fees (reasonableness of rate) and correspond with Tim re same (1.5)	1.5
18-Sep	Correspond with Tim re fees (response to settlement offer, potential stipulation re rates) (.1)	0.1

19-Sep	Correspond with WMT re expert declaration in support of motion for fees (.1)	0.1
23-Sep	Review correspondence from Angel re fee settlement, stipulation (.1); correspond with Tim re same and fee memorandum, declarations, etc. (.2)	0.3
24-Sep	Review draft of memo in support of fees and correspond with Tim re comments to same (.5); correspond with Tim and Kevin re same (.1); review proposed stipulation and draft proposed edits to same, and correspond with Tim re same (.3)	0.9
25-Sep	Correspond with Tim re fee memorandum, declaration, etc. (.2); prepare declaration in support of same and correspond with Tim re same (1.7)	1.9
29-Sep	Review final Memorandum in support of fees (n/c .1)	0.0
30-Sep	Research SD Ohio opinion released today re attorney fees under 42 USC 1988 (in <i>ABC v. Blackwell</i> ) (.3) and correspond with Tim re same (.1)	0.4
6-Oct	Correspond with Angel re consent for add'l time and review correspondence from Tim re same (.2)	0.2
16-Oct	Review final judgment and Prelim Inj order and review correspondence from Michele re Bill of Costs (.1)	0.1
24-Oct	Review Library's memo in opposition to motion for attorney fees (.7); correspond with Tim re same and reply brief (.1)	0.8
29-Oct	Correspond with Tim re reply brief in support of fee motion (.1)	0.1
30-Oct	Telephone conference with Tim re go over Library's memo contra to our motion for fees and discuss reply brief (.7)	0.7
6-Nov	Research and draft notes re Library's memorandum (1.1); begin drafting edits to reply brief (0.9)	2.0
7-Nov	Review and revise reply brief, including correspondence with Tim re <i>Estep, Stahl</i> , etc. and discuss strategy re that section of reply memo, research of applicable cases ( <i>Estep, Stahl, Disabled Patriots</i> ), cursory review of pleadings in <i>Estep/Lambert</i> (2.2)	2.2
10-Nov	Correspond with Tim re <i>Estep/Lambert</i> pleading comparison and status of reply memo (.1); review and revise same (.7)	0.8
11-Nov	Review and revise Reply Memo (2.1); draft correspondence to Tim regarding same (.1)	2.2
12-Nov	Correspond with Tim regarding final revisions to Reply Memorandum, Supplemental Declarations, etc. (.2); draft Supplemental Declaration (1.6)	1.8

TOTAL

62.7

**Summary:**

DRL	Langdon, David R.	51.0	hrs. @	\$285.00	/ hr.	\$14,535.00
DRL	Langdon, David R.	11.3	hrs. @	\$285.00	/ hr.	\$3,220.50

**Disbursements:**

Copies (324 x \$.20)	64.80
Copies (68 x \$.20)*	13.60
Computerized legal research	52.00
Computerized legal research*	18.25
Long distance charges	7.34
Federal Express	20.32

\* new charges

Total disbursements	\$176.31
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TOTAL FOR PROFESSIONAL SERVICES (THROUGH 9-25)	\$14,535.00
TOTAL FOR PROFESSIONAL SERVICES (SINCE 9-26)	\$3,220.50
TOTAL DISBURSEMENTS	\$176.31

<b>TOTAL OF NEW CHARGES FOR THIS INVOICE</b>	<b>\$17,931.81</b>
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