

EXHIBIT 3

Law Office of
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RE: Jaymee L. Walker and Anne M. Hinkle v. James W. Gruver, Thomas L. Ginnick,
George Bauserman, Sr., and Southampton Township

<u>Billing Line</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>TASK</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>LWYR</u>
1	Apr-01-13	Dictate part of Petition; emails to co-counsel and Attorney Serratelli; conference w/co-counsel.	BW	1.20	420.00	RPM
2		Work on remainder of Petition.	BW	2.80	980.00	RPM
3	Apr-02-13	Email from Attorney Serratelli.	BW	0.20	70.00	RPM
4		Review/revise portion of Brief; locate citations; draft remainder; deliver to office; instructions to assistant.	BW	7.80	2,730.00	RPM
5	Apr-03-13	Review/revise Petition 2nd draft; email from Serratelli.	BW	1.70	595.00	RPM
6	Apr-04-13	Review revisions to 2nd draft; email from co-counsel; email from Serratelli; review co-counsel's revisions.	BW	1.20	420.00	RPM
7	Apr-05-13	Continue w/Petition; comments from/responses to co-counsel and Serratelli; review draft from co-counsel and compare with my draft.	BW	5.80	2,030.00	RPM
8		Emails from/responses to co-counsel and Serratelli.	BW	1.40	490.00	RPM
9	Apr-06-13	Work on revisions; incorporate references to appellate law; email from assistant; review 4th draft of Petition.	BW	3.50	455.00	RPM
10	Apr-07-13	Finish draft of Petition; deliver to office; email to co-counsel and Serratelli.	BW	4.50	585.00	RPM
11	Apr-08-13	Email from assistant; review 6th draft of Petition.	BW	1.20	420.00	RPM

<u>Billing Use</u>						
12	Apr-09-13	Revisions to Petition; review Affidavits; emails to Serratelli and co-counsel; email to Steve Greecher, Esq.; Affidavit from Greecher; email to Greecher; review revisions from co-counsel and Serratelli; begin review of time sheets.	BW	6.30	2,205.00	RPM
13	Apr-10-13	Emails from/responses to co-counsel and Serratelli; conference w/co-counsel's assistant regarding records; conference w/co-counsel.	BW	2.40	840.00	RPM
14		Review records; compile "name list"; email to Serratelli; message to assistant.	BW	1.70	595.00	RPM
15	Apr-11-13	Emails to/responses from co-counsel and Serratelli; email from assistant; review next draft of Petition; conference w/co-counsel (x2); email from Serratelli; apply revisions to draft.	BW	2.00	700.00	RPM
16	Apr-12-13	Email from Serratelli.	BW	0.20	70.00	RPM
17		Review current draft of Petition and exhibits; revisions to assistant.	BW	1.00	350.00	RPM
18	Apr-13-13	Email from/response to co-counsel.	BW	0.20	70.00	RPM
19	Apr-15-13	Email from/response to co-counsel.	BW	0.20	70.00	RPM
20	May-17-13	Email from defense counsel; conference w/assistant.	BW	0.40	140.00	RPM
21	May-20-13	Emails to Serratelli, Reddings, and assistant.	BW	0.80	280.00	RPM
22		Call to Reddings.	BW	0.40	140.00	RPM
23	May-21-13	Email to/response from Serratelli.	BW	0.30	105.00	RPM
24	May-22-13	Review CFA; call to defense counsel.	BW	0.40	140.00	RPM
25	May-31-13	Email to co-counsel.	BW	0.30	105.00	RPM

Billable Line	Date	Description	Rate	Hours	Amount	Category
26	Jun-04-13	Review filings; email from opposing counsel; email from assistant; review Order; conference w/opposing counsel; email from/to opposing counsel.	BW	1.20	420.00	RPM
27	Jun-05-13	Email from assistant.	BW	0.20	70.00	RPM
28		Emails from assistant (Brief & Exhibit 20); conference w/assistant; call to co-counsel; pick up printed Brief and Exhibits; review expert's Exhibits.	BW	1.80	630.00	RPM
29	Jun-06-13	Email from opposing counsel.	BW	0.20	70.00	RPM
30	Jun-09-13	Review: Brief in Opposition to Plaintiffs' Petition for Attorney Fees and Hearing, including Exhibits.	BW	1.20	420.00	RPM
31	Jun-10-13	Conference w/assistant; email and corrected Exhibit from Attorney Serratelli; conference w/ Serratelli's office; calls to co-counsel; conference w/ co-counsel's assistant; begin review of Brief (outline/to-do; issues raised for Cross).	BW	2.60	910.00	RPM
32		Continue with Brief; review file from CED and PSATS publication.	BW	0.60	210.00	RPM
33	Jun-11-13	Email from Serratelli; comments on Petition/Brief; call to office; calls to co-counsel; email from and conference w/ co-counsel's assistant.	BW	0.70	245.00	RPM
34	Jun-12-13	Email from Serratelli.	BW	0.30	105.00	RPM
35		Conference w/ and email from co-counsel's assistant; copy Brief and Exhibits; prepare for conference w/ co-counsel (issues to discuss).	BW	0.90	315.00	RPM
36	Jun-13-13	Call from co-counsel's assistant; conference w/co-counsel; email from co-counsel.	BW	1.00	350.00	RPM
37		Email to/from Serratelli.	BW	0.30	105.00	RPM
38	Jun-14-13	Calls to opposing counsel; conference w/co-counsel's assistant; emails from opposing counsel; email from assistant;	BW	1.40	490.00	RPM

Billing Line

38 (cont.)		conference w/assistant re: concurrence; calls to opposing counsel; emails from opposing counsel; review filings.				
39		Email from Serratelli; check Rules and Judge's preferences; emails to opposing counsel; conference w/clerk; email to/from opposing counsel; draft Motion.	BW	3.00	1,050.00	RPM
40	Jun-15-13	Begin review of Brief w/outline and notes re: to-do and possible cross/rebuttle.	BW	3.10	1,085.00	RPM
41	Jun-19-13	Continue w/review of Brief; to-do outline; notes for cross/rebuttal.	BW	3.20	1,120.00	RPM
42	Jun-20-13	Continue with same.	BW	2.20	770.00	RPM
43	Jun-21-13	Continue with review; notes; outline; to-do and issues for cross.	BW	1.80	630.00	RPM
44	Jun-22-13	Review defense Brief - tablets for to-do outline; issues for direct and cross.	BW	2.40	840.00	RPM
45	Jun-23-13	Emails to co-counsel (x3); emails to clerk (x3); print research; review case; email to assistant.	BW	1.50	525.00	RPM
46	Jun-24-13	Email from Serratelli; email from assistant; review Toothman CV; email from assistant w/publications; conference w/Alexa re: research on Toothman (case excerpts - additional research).	BW	1.80	630.00	RPM
47	Jun-25-13	Work on coordinating phone conference - (conferences w/co-counsel; co-counsel assistant; assistant; Judge's office). Read literature on Toothman; emails to and from Serratelli.	BW	2.90	1,015.00	RPM
48	Jun-26-13	Email (Order); email to/from assistant regarding phone conference.	BW	0.40	140.00	RPM
49	Jun-27-13	Continue w/Brief; outline; to-do, potential cross examination issues.	BW	2.40	840.00	RPM

Billing Line	Date	Description	Unit	Rate	Amount	Code
50	Jun-28-13	Continue w/ review of Brief - outline; notes for cross; things to-do.	BW	1.50	525.00	RPM
51	Jun-29-13	Continue digesting Brief - outline; thoughts for cross; to-do list; look for correspondence; dates, memos in file.	BW	3.10	1,085.00	RPM
52	Jun-30-13	Continue working on Brief - outline; thoughts for cross, to-do list; emails to/from Serratelli; emails to/from clerk; look for items in files for verification and copying.	BW	4.60	1,610.00	RPM
53	Jul-01-13	Emails from Attorney Serratelli & law clerk; print cases; continue w/ digesting Brief - same method - look for items in files I have at home - start reading cases from Serratelli.	BW	4.80	1,680.00	RPM
54	Jul-02-13	Emails from assistant; conference w/assistant.	BW	0.30	105.00	RPM
55		Continue w/reading cases from clerk; review/revise "to do" list.	BW	3.80	1,330.00	RPM
56	Jul-03-13	Continue w/ Defendant's Brief and expert report; continue w/ tablets (outline, to-do, cross).	BW	2.60	910.00	RPM
57	Jul-05-13	Continue w/ Defendant's Brief; read additional articles of Toothman; additional research on Toothman; prepare list of items to raise during conference call.	BW	3.80	1,330.00	RPM
58	Jul-06-13	Review Toothman report and review time records attached.	BW	2.50	875.00	RPM
59	Jul-08-13	Continue w/ Defendant's Brief - notes; tablets - to-do, cross, & outline.	BW	2.10	735.00	RPM
60	Jul-10-13	Emails to co-counsel regarding Saturday's meeting; conference w/co-counsel's assistant.	BW	0.60	210.00	RPM
61	Jul-11-13	Continue w/Brief - outline to-do, cross, and argument for phone conference.	BW	2.30	805.00	RPM
62	Jul-12-13	Locate email w/cases attached; email to assistant; conference w/assistant re: to-do items.	BW	0.50	175.00	RPM

<u>Billing Line</u>						
63		Conference w/co-counsel; messages to co-counsel; continue w/Defendant's Brief & tablets; prepare list of items to discuss w/co-counsel.	BW	2.30	805.00	RPM
64	Jul-13-13	Meeting w/co-counsel; review arguments in Brief; assign things to do.	BW	4.50	1,575.00	RPM
65	Jul-14-13	Consolidate notes for Memo to co-counsel and Serratelli; messages to/from co-counsel and assistant; review to-do list.	BW	2.80	980.00	RPM
66	Jul-16-13	Continue outline of Brief and expert report; read case law regarding attorney's fees cited in Brief.	BW	2.80	980.00	RPM
67	Jul-17-13	Review/revise typed portion of "rebuttal"; continue dictating rebuttal.	BW	2.80	980.00	RPM
68	Jul-18-13	Review revisions and continue drafting rebuttal; emails re: Conference Call; conference w/assistant (x3).	BW	3.60	1,260.00	RPM
69	Jul-19-13	Email from assistant; call to co-counsel; conference w/co-counsel.	BW	0.40	140.00	RPM
70		Email from Serratelli.	BW	0.20	70.00	RPM
71	Jul-21-13	Reply to Serratelli; email from/response to co-counsel.	BW	0.60	210.00	RPM
72	Jul-22-13	Email to co-counsel; conference w/co-counsel; review co-counsel's comments on rebuttal; email response to co-counsel. Continue w/rebuttal of Brief, to-do list, and possible cross-examination issues for Defendants and expert emails to/from Serratelli and co-counsel.	BW	3.60	1,260.00	RPM
73	Jul-23-13	Read three Middle District cases on fees; prepare arguments for conference; email to/from Lori; email to Carol; conference w/Carol; Conference Call; conference w/Carol; email to Lori & co-counsel; email response from Pat; revise my response to his email questions/comments.	BW	6.20	2,170.00	RPM

<u>Billing Line</u>						
74	Jul-26-13	Emails from Court; email from assistant; review Order; call to/conference w/Greecher.	BW	0.70	245.00	RPM
75	Aug-14-13	Pick up Defendants' Brief and Expert Report; identify items to be produced (specific letters to be located).	BW	1.60	560.00	RPM
76	Aug-17-13	Continue with list for assistant to locate; refer to time records and docket entries for approximate time(s) of correspondence; review/revise rebuttal.	BW	3.50	1,225.00	RPM
77	Aug-18-13	Continue with list for assistant to locate; refer to time records and docket entries for approximate time(s) of correspondence; review/revise rebuttal.	BW	2.00	700.00	RPM
78	Aug-19-13	Emails to/from Carol; arrange conference call; conference w/assistant re: items to be produced; look for deposition summaries and legal memos.	BW	2.80	980.00	RPM
79	Aug-20-13	Emails to/from Carol; review comments from Lori.	BW	0.80	280.00	RPM
80	Aug-22-13	Email to Lori; multiple emails from/to Carol; call to/from Carol regarding things to produce; email Lori's comments to Carol; review with assistant.	BW	10.80	3,780.00	RPM
Totals				169.50	\$57,565.00	
Previous Balance					\$613,547.25	
TOTAL BALANCE DUE:					\$671,112.25	

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(717) 267-1440

Jayne Walker
Anne Hinkle

Billing Line ADDENDUM TO INVOICE RE ATTORNEY FEE PETITION (4-9-2013 thru 8-23-2013)

	DATE	PROFESSIONAL SERVICES RENDERED	TIME	ATTY
81	4/10/2013	Conference with co-counsel	.50	CAR/PJR
82	4/11/2013	Conference with co-counsel re re-draft of Petition	.50	CAR/PJR
83	4/12/2013	Emails between co-counsel, Serratelli, re final drafts of Petition	.50	CAR/PJR
84	4/13/2013	Emails with co-counsel	.25	CAR
85	4/15/2013	Emails with co-counsel	.25	CAR
86	5/20/2013	Teleconference with co-counsel	.50	CAR/PJR
87	5/31/2013	Email to co-counsel	.25	CAR
88	6/5/2013	Teleconference with co-counsel	.25	CAR
89	6/10/2013	Teleconference with co-counsel	.50	CAR
90	6/11/2013	Teleconference with co-counsel	.25	CAR
91	6/13/2013	Teleconference with co-counsel	1.00	CAR/PJR
92	6/23/2013	Emails (X3) to co-counsel	.50	CAR
93	6/25/2013	Teleconference with co-counsel to coordinate Conference call with Judge Connor	.25	CAR
94	7/10/2013	Emails to co-counsel re: meeting	.25	CAR
95	7/12/2013	Teleconference with co-counsel re meeting	.25	CAR

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96	7/13/2013	Meeting with co-counsel	4.50	CAR
97	7/14/2013	Emails and teleconference with co-counsel re to-do List re Fee Petition and Preparation	.50	CAR
98	7/19/2013	Telephone conference with co-counsel	.25	CAR
99	7/21/2013	Email to co-counsel	.25	CAR
100	7/22/2013	Email to co-counsel, conference with co-counsel	.50	CAR
101	7/23/2013	Multiple emails, teleconference with co-counsel	1.00	CAR
102	7/23/2013	Conference call with Judge Connor	.50	CAR
103	7/26/2013	Review of Order re Fee Petition Hearing	.25	CAR

TOTAL HOURS FOR THE ABOVE SERVICES
PJR/CAR 13.75 @ 300.00 HOURLY RATE \$4,125.00

TOTAL FEES	INVOICE	\$300,755.00
	ADDENDUM INVOICE	4,125.00
		\$304,880.00