



Larkin Hoffman Daly & Lindgren Ltd.

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GENERAL: 952-835-3800  
FED TAX ID#: 41-0953357

PERSONAL AND CONFIDENTIAL  
MINNESOTA SENATE  
ATTN: JOANNE ZOFF  
231 STATE CAPITOL  
75 DR. MARTIN LUTHER KING, JR. BLVD.  
ST. PAUL, MN 55155

Invoice Number 630500  
Invoice Date 05/21/13  
File Number 35256.00000

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Re: BRODKORB VS. MINNESOTA SENATE

**FOR PROFESSIONAL SERVICES RENDERED: FEBRUARY 1, 2013 THROUGH APRIL 30, 2013 (3 months)**

Date	Tkpr		Hours	Value
02/13/13	DWN	Telephone conference with T. Bottern; review court order; telephone conference with Associated Press	1.50	495.00
02/14/13	CJH	Review decision on Rule 12 and 21 motions; outline possible Rule 11 issues	0.70	231.00
02/14/13	DWN	Telephone conference with T. Bottern	0.90	297.00
02/14/13	RJR	Analysis of procedures for answering complaint after partial motion to dismiss; analysis of relevant caselaw concerning timing of response and content; confer with D. Nolan regarding same	2.40	504.00
02/15/13	DWN	Call Judge Nelson's office; draft letter; telephone conference with T. Bottern	1.00	330.00
02/15/13	RJR	Continue analysis of procedural steps for answering complaint after partial motion to dismiss; examine exemplar motions and judge's orders; confirm lack of applicable rules or standards; confer with D. Nolan regarding results of search	1.10	231.00
02/19/13	CJH	Office conference with D. Nolan regarding status, procedural issues, tactics (1.10); research various appellate issues, Rule 11 issues and discovery scope issues (2.10)	3.20	1,056.00
02/19/13	DWN	Office conference regarding projects and research necessary; review research; telephone conference with T. Bottern	1.10	363.00
02/20/13	CJH	Office conference with D. Nolan regarding answer; draft answer to complaint; review law on GERA preclusive effect	2.20	726.00
02/20/13	DWN	Office conference with C. Harristhal regarding drafting answer	0.40	132.00
02/20/13	RJR	Analysis of effect of partial dismissal on remaining parties; investigate applicable caselaw and Local Rules concerning motions to reconsider; report to D. Nolan regarding results of investigation	2.40	504.00
02/21/13	CJH	Revise answer (.80); conference call with client (No Charge)	0.80	264.00

Date	Tkpr		Hours	Value
02/21/13	DWN	Telephone conference with T. Bottern, et al.	0.80	264.00
02/22/13	CJH	Call to Judge Nelson's chambers (Lynn Holden) regarding our correspondence (.10); office conference with D. Nolan regarding letter drafts to Plaintiff's counsel, memo to client and revisions to answer (.70); draft letter to G. Walsh regarding sanctions (.70)	1.50	495.00
02/22/13	DWN	Telephone conference with T. Bottern; revise answer; office conference with C. Harristhal regarding strategy on answer	1.10	363.00
02/24/13	CJH	Partial draft of memo for client on sex discrimination and similarly situated analysis	1.00	330.00
02/25/13	CJH	Compile memo for client on gender discrimination theory and burdens of proof	0.70	231.00
02/26/13	CJH	Revise answer to original complaint; review letter from P. Villaume; call to court	1.20	396.00
02/26/13	DWN	Office conference regarding paragraph 7 of answer; review P. Villaume letter; office conference regarding call to court	0.50	165.00
02/28/13	CJH	Office conference with D. Nolan regarding Rule 11 letter (No Charge)	0.00	0.00
03/14/13	DWN	Review amended complaint; office conference regarding comparison; telephone conference with T. Bottern	0.60	198.00
03/15/13	DWN	Telephone conference with T. Bottern	0.25	82.50
03/22/13	CJH	Review amended complaint; draft answer to same; review privilege and immunities research for same	1.50	495.00
03/22/13	DWN	Telephone conference with T. Bottern	0.30	99.00
03/27/13	DWN	Do final review of and revisions to answer	0.30	99.00
03/27/13	DWN	Telephone conference with T. Bottern	0.60	198.00
03/28/13	CJH	Office conference with D. Nolan; email for clients regarding process and timing; review order from court on scheduling, email to client regarding same (0.70); telephone conference with T. Bottern and D. Nolan (.20)	0.90	297.00
03/28/13	DWN	Review order and memoranda regarding scheduling; telephone conference with T. Bottern	0.40	132.00
03/29/13	CJH	Call from P. Villaume regarding 26(f) conference	0.50	165.00
04/03/13	CJH	Office conference with D. Nolan regarding 26(f) report and disclosures, outline responses for 26(f) report	1.00	330.00
04/03/13	DWN	Office conference regarding Rule 26(f) conference and report issues; telephone conferences with T. Bottern	1.10	363.00
04/03/13	JAK	Research and analysis of federal constitutional issues regarding Minnesota Human Rights Act	0.20	41.00
04/03/13	JYJ	Draft Rule 26(f) report	0.30	52.50
04/04/13	CJH	Prepare draft 26(f) report and confidentiality stipulation	1.20	396.00
04/05/13	CJH	Revise protective order and 26(f) report draft; email same to plaintiff's counsel	0.80	264.00
04/06/13	CJH	Emails from P. Villaume; review his 26(f) report and news clippings regarding Villaume protective order admissions	0.30	99.00

Date	Tkpr		Hours	Value
04/07/13	CJH	Revise interrogatories and requests for production of documents to comport with amended complaint	1.00	330.00
04/08/13	CJH	Revise 26(f) report with Plaintiff's proposals; attend 26(f) meeting; office conference with D. Nolan (2.25); issue notice of deposition for Plaintiff; telephone conference with T. Bottern and D. Nolan; draft statement regarding protective order for client; revise protective order (1.90)	4.10	1,353.00
04/08/13	DWN	Office conference regarding results of Rule 26(f) conference; review draft report; telephone conference with T. Bottern; office conference with C. Harristhal	1.40	462.00
04/09/13	CJH	Email to client regarding protective order	0.30	99.00
04/09/13	DWN	Telephone conference with T. Bottern	0.50	165.00
04/11/13	CJH	Telephone conference with client regarding status, 26(f) report and disclosures	1.20	396.00
04/11/13	DWN	Telephone conference with T. Bottern; gather materials for conference call; telephone conference with committee; telephone conference with T. Bottern	2.40	792.00
04/15/13	CJH	Create initial disclosures form	0.30	99.00
04/16/13	CJH	Prepare initial disclosures	0.90	297.00
04/16/13	DWN	Revise letter to Plaintiff's attorneys regarding dismissal/sanctions; review database for documents to include in Rule 26(a)(1) disclosures	3.10	1,023.00
04/17/13	CJH	Revise disclosures (.30); review deposition notices (.10); telephone conference with T. Bottern and D. Nolan regarding same (.10); review rule on filing discovery and issues in same (1.0)	1.50	495.00
04/17/13	DWN	Review notices; office conference with C. Harristhal; telephone conferences with T. Bottern; telephone conference with C. Ludeman; telephone conference with C. Gerlach	2.50	825.00
04/18/13	CJH	Revise disclosures (.40); direct procedural research regarding deposition notices (.40); office conference with D. Nolan regarding disclosures (.30); review results of Rule 45 research (.30)	1.40	462.00
04/18/13	DWN	Office conference regarding Rule 26(a)(1) disclosures; revise same	0.50	165.00
04/18/13	RJR	Analysis of issues surrounding notices of deposition and requirements for service of subpoena; confer with C. Harristhal regarding the same; create and revise memorandum outlining findings; transmit memorandum to D. Nolan and C. Harristhal	2.30	483.00
04/19/13	CJH	Office conference with D. Nolan regarding deposition issues	0.30	99.00
04/19/13	DWN	Telephone conference with T. Bottern regarding Rule 26 disclosures; review Plaintiff's letter and cases cited	1.50	495.00
04/20/13	CJH	Draft letter to counsel regarding improper deposition notices	0.50	165.00
04/22/13	CJH	Review letter from Counsel; revise letter to counsel (.50); draft letter to Judge Boylan (1.50)	2.00	660.00
04/23/13	CJH	Office conference with D. Nolan; draft letter to G. Walsh regarding deposition	0.90	297.00

Date	Tkpr		Hours	Value
04/23/13	DWN	Review media reports; telephone conference with C. Nauen; office conference with C. Harristhal regarding Protective Order issue; telephone conference with T. Bottern	2.20	726.00
04/23/13	RJR	Research and analysis of caselaw concerning protective orders protecting privacy of third-party witnesses; confer with C. Harristhal regarding the same	2.70	567.00
04/24/13	CJH	Revise letter to Judge Boylan; review letter from Plaintiff's counsel; review protective order research	0.60	198.00
04/24/13	DWN	Review protective order research; finalize Boylan letter; office conference regarding chart and prepare notes; telephone conference with C. Robling	2.30	759.00
04/25/13	CJH	Review Plaintiff's initial disclosures; telephone conference with Judge Boylan; telephone conference with T. Bottern	1.20	396.00
04/25/13	DWN	Telephone conference with T. Bottern; revise letter; telephone conference with C. Harristhal; review disclosures; telephone conference with Judge Boylan's clerk; telephone conference with Judge Boylan; telephone conference with T. Bottern	3.70	1,221.00
04/26/13	CJH	Office conference with D. Nolan; outline research project; review press on disclosures	0.60	198.00
04/26/13	DWN	Review Plaintiff's Rule 26(a) disclosures; telephone conference with T. Bottern	2.90	957.00
04/26/13	RJR	Continue research and analysis; investigate 8th Circuit caselaw regarding same and perform broader nationwide search	1.80	378.00
04/27/13	CJH	Review discovery research and disclosures; review Senate's final disclosures	0.60	198.00
04/29/13	CJH	Revise letter to Judge Boylan (.40); review protective order research, outline issues for presentation of same (1.10)	1.50	495.00
04/29/13	RJR	Continue analysis of research; locate Rule 30 cases; transmit email to D. Nolan and C. Harristhal regarding findings	0.90	189.00
04/30/13	CJH	Review additional research, draft proposed protective order (.90); office conference with D. Nolan regarding same and strategy for hearing (.50)	1.40	462.00
04/30/13	DWN	Office conference with C. Harristhal; telephone conference with T. Bottern; revise list; office conference with C. Harristhal; email Judge Boylan; office conference with C. Harristhal	3.10	1,023.00
04/30/13	RJR	Analysis of cases under Rule 30	0.40	84.00

**Litigation Support Technical Services**

Date	Tkpr		Hours	Value
02/19/13	DLG	Document coding in Summation database (No Charge)	0.50	0.00
02/19/13	KES	Scan document images and load same to Summation database (No Charge)	0.40	0.00
03/04/13	DLG	Document coding in Summation database (No Charge)	0.10	0.00
03/04/13	KES	Scan document images and load same to Summation database (No Charge)	0.20	0.00

Date	Tkpr		Hours	Value
04/04/13	DLG	Document coding in Summation database (No Charge)	0.20	0.00
04/04/13	KES	Scan document images and load same to Summation database (No Charge)	0.30	0.00
04/15/13	DLG	Document coding in Summation database (No Charge)	0.10	0.00
04/15/13	KES	Scan document images and load same to Summation database (No Charge)	0.10	0.00
04/19/13	DLG	Document coding in Summation database (No Charge)	0.20	0.00
04/19/13	KES	Scan document images and load same to Summation database (No Charge)	0.30	0.00
04/26/13	DLG	Document coding in Summation database (No Charge)	0.30	0.00
04/26/13	KES	Scan document images and load same to Summation database (No Charge)	0.40	0.00
TOTAL HOURS			92.35	

TIMEKEEPER SUMMARY

Timekeeper	Title	Hours	Rate	Value
C. J. HARRISTHAL	SHAREHOLDER	37.80	at 330.00 =	12,474.00
D. W. NOLAN	SHAREHOLDER	36.95	at 330.00 =	12,193.50
R. J. REDING	ASSOCIATE	14.00	at 210.00 =	2,940.00
J. A. KVINGE	ASSOCIATE	0.20	at 205.00 =	41.00
J. Y. JAHN	PARALEGAL	0.30	at 175.00 =	52.50

CURRENT FEES 27,701.00

**TOTAL DUE UPON RECEIPT \$27,701.00**

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**REMITTANCE COPY**

Re: BRODKORB VS. MINNESOTA SENATE

FOR PROFESSIONAL SERVICES RENDERED: FEBRUARY 1, 2013 THROUGH APRIL 30, 2013

CURRENT FEES	27,701.00
CURRENT EXPENSES	<u>0.00</u>
TOTAL DUE UPON RECEIPT	<u>\$27,701.00</u>

PLEASE RETURN THIS PAGE WITH YOUR REMITTANCE

