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 Federal Tax I.D. #65-0500793

CITY OF MARCO ISLAND
 C/O RONY JOEL
 50 BALD EAGLE DRIVE
 MARCO ISLAND, FLORIDA 34145

Invoice 47542 - 73490
 April 13, 2010

Re: CITY OF MARCO ISLAND ADV CITIZENS ADVOCATING RESPONSIBLE
 ENVIRONMENTAL SOLUTIONS INC.

ID: 783-003 - KSH

CONFIDENTIAL- ATTORNEY CLIENT PRIVILEGED

For Services Rendered Through October 26, 2009

Current Fees	194,072.50	
Current Disbursements	10,793.94	
Total Current Charges	204,866.44	
Total Current Due		204,866.44

Fee Recap

		Hours	Rate/Hour	Amount
KEVIN S. HENNESSY	1 - EQUITY	10.30	250.00	2,575.00
KEVIN S. HENNESSY	1 - EQUITY	31.50	245.00	7,717.50
KEVIN S. HENNESSY	1 - EQUITY	141.30	225.00	31,792.50
KEVIN S. HENNESSY	1 - EQUITY	1.00	0.00	0.00
TERRY E. LEWIS	1 - EQUITY	1.00	245.00	245.00
DANIEL D. RICHARDSON	1 - EQUITY	2.40	235.00	564.00
MAGGIE D. MOONEY-	2 - NON-EQUITY	2.80	195.00	546.00
MAGGIE D. MOONEY-	2 - NON-EQUITY	136.80	185.00	25,308.00
H. HAMILTON RICE JR.	4 - SENIOR ATTORNEY	0.60	280.00	168.00
R. DAVID JACKSON	5 - ASSOCIATE	26.70	200.00	5,340.00
R. DAVID JACKSON	5 - ASSOCIATE	180.50	195.00	35,197.50
R. DAVID JACKSON	5 - ASSOCIATE	440.70	175.00	77,122.50
RICINDA H. PERRY	5 - ASSOCIATE	12.20	185.00	2,257.00
SANDRA BATTLE	8 - PARALEGAL	40.50	100.00	4,050.00
MELANIE MARKEN	8 - PARALEGAL	12.30	100.00	1,230.00
FRANCINE SHAY	8 - PARALEGAL	1.70	110.00	187.00
Totals		1,042.30		194,300.00

Disbursements

Description	Amount
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COST SURCHARGE	6,783.15
COMPUTER RESEARCH	757.29
	145.52
MILEAGE CHARGES	324.79
COPY CHARGES	128.01
	132.41
	128.98
	1,021.11
DEPOSITION	1,262.70
TELEPHONE CHARGES	43.23
	66.75
Total Disbursements	10,793.94

Fees					
Date	Atty	Description	Hours	Rate	Amount
03/10/06	KSH	PHONE CONFERENCE WITH B. MOSS RE: REPRESENTATION.(NO CHARGE)	1.00		
03/17/06	MDM	RECEIVE AND REVIEW COMPLAINT, AMENDED COMPLAINT AND SUMMONS; CALENDAR RESPONSIVE PLEADING DEADLINE.	1.10	185.00	203.50
03/20/06	KSH	OFFICE CONFERENCE WITH B. MOSS RE: COMPLAINT; WORK SESSION WITH M. MOONEY.	1.00	225.00	225.00
03/20/06	RDJ	CONFER WITH M. MOONEY RE: MATTER AND NEED FOR PRELIMINARY RESEARCH; RECEIVE AND REVIEW AMENDED COMPLAINT; RESEARCH CONCERNING AIR QUALITY REGULATION IN FLORIDA AND COMPLIANCE WITH THE CLEAN AIR ACT.	2.40	175.00	420.00
03/21/06	RDJ	WORK SESSION WITH K. HENNESSY AND M. MOONEY RE: APPROACH TO MATTER; PHONE CONFERENCE WITH B. MOSS, CITY MANAGER, K. HENNESSY AND M. MOONEY RE: CURRENT STATUS OF PROJECT AND SERVICE OF COMPLAINT TO CITY; PHONE CONFERENCE WITH K. HENNESSY, M. MOONEY AND G. URBANIC, CITY'S ATTORNEY, RE: SERVICE OF COMPLAINT AND RECEIPT OF OTHER FILINGS; RECEIVE AND REVIEW VARIOUS DOCUMENTS FROM CITY'S ATTORNEY; RECEIVE AND REVIEW DOCUMENTS FROM CITY INCLUDING CONTRACT WITH QUALITY ENTERPRISES; RECEIVE AND REVIEW ALL DOCUMENTS FILED TO DATE INCLUDING MOTION FOR PRELIMINARY INJUNCTION AND ORDER DENYING TEMPORARY RESTRAINING ORDER AND SETTING MOTION FOR PRELIMINARY INJUNCTION FOR HEARING; NATIONAL EMISSION STANDARDS FOR	4.60	175.00	805.00

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Date	Atty	Description	Hours	Rate	Amount
03/21/06	SB	HAZARDOUS AIR POLLUTANTS CASES IN GENERAL. CONFIRM MIDDLE DISTRICT RULES ON DISCOVERY FILING, MOTION FILING AND OTHER DEADLINES; REVIEW FLORIDA STATUTES PERTAINING TO SAME.	1.90	100.00	190.00
03/21/06	MDM	RECEIVE AND REVIEW CORRESPONDENCE RE: MEETING RE: TEMPORARY RESTRAINING ORDER, ORDER ON TEMPORARY RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION; RECEIVE AND REVIEW NOTICE OF EVIDENTIARY HEARING AND AFFIDAVITS FROM F. NEYLON, E. FOSTER AND S. GOLD FILED IN SUPPORT OF TEMPORARY RESTRAINING ORDER; RECEIVE AND REVIEW ORDER FROM JUDGE STEELE ON TEMPORARY RESTRAINING ORDER AND EVIDENTIARY HEARING ON MOTION FOR INJUNCTIVE RELIEF; FINALIZE NOTICE OF APPEARANCE; REVIEW COURT DOCKET; PHONE CONFERENCE AND OFFICE CONFERENCE WITH B. MOSS AND K. HENNESSY RE: STATUS, UPCOMING HEARING, CITY COUNSEL'S SERVICE OF MOTIONS; CONFERENCE CALL WITH K. HENNESSY AND G. URBANIC RE: DOCUMENTS TRANSMITTED TO R. YOVANOVICH AND SERVED BY PLAINTIFFS, BASIS FOR MOTION FOR CONTINUANCE OF HEARING; WORK SESSION WITH K. HENNESSY AND D. JACKSON RE: PREPARATION OF RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION, MOTION TO DISMISS AND MOTION FOR CONTINUANCE; REVIEW CONTRACTS WITH CONTRACTOR; REVIEW CITY DOCUMENTS; RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCES FROM G. URBANIC.	3.90	185.00	721.50
03/21/06	DDR	TELEPHONE CALL FROM D. JACKSON RE: CITY OF MARCO ISLAND; REVIEW GUIDANCE DOCUMENTS; SEND SAME TO D. JACKSON.	1.40	235.00	329.00
03/21/06	KSH	RECEIVE AND REVIEW PLEADINGS; OFFICE CONFERENCE WITH M. MOONEY; PHONE CONFERENCE WITH B. MOSS; PHONE CONFERENCE WITH CITY ATTORNEY; PHONE CONFERENCE WITH B. MOSS; RECEIVE AND REVIEW EMAILS FROM B. MOSS.	3.00	225.00	675.00
03/22/06	RDJ	PHONE CONFERENCE WITH K. HENNESSY, B. MOSS, CITY MANAGER, R. JOEL, CITY ENGINEER, M. DANIEL, CONSTRUCTION MANAGER AND J. SNIDER, ENVIRONMENTAL CONSULTANT, RE: SPECIFICS OF CONSTRUCTION PROJECT, ASBESTOS TESTING AND MONITORING THAT HAS BEEN CONDUCTED ON SITE AND CITY'S UPCOMING MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION;	7.40	175.00	1,295.00

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Date	Atty	Description	Hours	Rate	Amount
		WORK SESSION WITH D. RICHARDSON RE: AMENDED COMPLAINT; RESEARCH CONCERNING ASBESTOS-CEMENT PIPES, CLEAN AIR ACT, NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS AND ISSUES RE: STANDING; PHONE CONFERENCE WITH B. MOSS RE: CITY'S HIRING OF ENVIRONMENTAL CONSULTANT; PHONE CONFERENCE WITH K. HENNESSY, B. MOSS AND R. JOEL TO FOLLOW UP ON CITY'S MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; STRATEGY SESSION WITH K. HENNESSY RE: PREPARATION OF AFFIDAVITS FOR HEARING ON MOTION FOR PRELIMINARY INJUNCTION; PHONE CONFERENCE WITH J. SNIDER RE: AFFIDAVIT AND RESULTS OF ASBESTOS TESTING AND MONITORING CONDUCTED ON SITE; PHONE CONFERENCE WITH A. WRIGHT, ASSISTANT DIRECTOR OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION, RE: AFFIDAVIT FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF.			
03/22/06	SB	REVIEW AND ORGANIZE PLEADINGS AND OTHER FILE MATERIALS IN PREPARATION FOR HEARING CALENDARED FOR MARCH 27; PHONE CALLS TO THE MIDDLE DISTRICT COURT; CALENDAR UPDATE RE: PENDING DEADLINES.	2.50	100.00	250.00
03/22/06	MDM	RESEARCH CONCERNING FEDERAL RULES AND LOCAL RULES IN PREPARATION FOR DRAFTING MOTION FOR CLARIFICATION; RESEARCH CONCERNING NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS ACTION; SEVERAL EMAIL CORRESPONDENCES AND PHONE CONFERENCES WITH K. HENNESSY AND D. JACKSON RE: CITY'S CONSULTANTS' AVAILABILITY, BANS FOR MOTION FOR CONTINUANCE, LOCAL RULE COMPLIANCE, FEDERAL RULES AND DISCOVERY JUDGMENT; SEVERAL PHONE CONFERENCES WITH S. GOLD RE: AGREEMENT TO MOTION FOR CONTINUANCE PER LOCAL RULE REQUIREMENT AND PLAINTIFF'S REQUEST FOR AGREEMENT ON MOTION FOR LEAVE TO AMEND; DRAFT MOTION FOR CONTINUANCE; RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCES RE: SUMMARY OF CITY MEETINGS FOR B. MOSS, CIRCUIT COURT ACTION, CARES FORMATION AND NOTICE OF HEARING; DRAFT CORRESPONDENCE TO S. GOLD RE: LACK OF AGREEMENT TO MOTION FOR LEAVE TO AMEND THE AMENDED COMPLAINT.	4.40	185.00	814.00

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03/22/06	DDR	RECEIVE AND REVIEW COMPLAINT; DRAFT COMMENTS TO D. JACKSON; TELEPHONE CONFERENCE WITH D. JACKSON RE: STRATEGY; REVIEW REGULATIONS.	1.00	235.00	235.00
03/22/06	KSH	ATTEND CONFERENCE CALL WITH CITY RE: MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; RECEIVE AND REVIEW EMAILS FROM B. MOSS, R. JOEL AND D. JACKSON; RECEIVE AND REVIEW FACSIMILE OF DEPARTMENT OF ENVIRONMENTAL PROTECTION CONTACTS AND CONTRACTOR CONTACTS; REVIEW AND REVISE MOTION FOR POSTPONEMENT; WORK SESSION WITH D. JACKSON RE: TASKS AND RESEARCH; WORK SESSION WITH M. MOONEY RE: MOTION; PHONE CONFERENCE WITH C. ROE.	2.50	225.00	562.50
03/23/06	RDJ	DRAFT AFFIDAVIT FOR M. DANIEL, CONSTRUCTION MANAGER FOR CITY OF MARCO ISLAND; PHONE CONFERENCES WITH B. MOSS, CITY MANAGER AND M. DANIEL RE: AFFIDAVIT; RECEIVE AND REVIEW SIGNED AFFIDAVIT FROM M. DANIEL; DRAFT AFFIDAVIT FOR A. WRIGHT, ASSISTANT DIRECTOR OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S SOUTH DISTRICT OFFICE; EMAIL CORRESPONDENCE WITH A. WRIGHT RE: AFFIDAVIT; DRAFT AFFIDAVIT OF J. SNIDER, PRESIDENT OF AMERICAN MANAGEMENT RESOURCES CORPORATION; PHONE CONFERENCE WITH J. SNIDER RE: AFFIDAVIT; REVISE AFFIDAVIT FOR J. SNIDER; RECEIVE AND REVIEW CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL'S MEMORANDUM IN OPPOSITION TO CITY'S REQUEST FOR POSTPONEMENT OF HEARING; RESEARCH CONCERNING NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS CASES, ASBESTOS AND ISSUES RELATED TO STANDING; PHONE CONFERENCE WITH R. JOEL RE: UPDATED PLANS FOR SECURING AND CLEANING UP SITE AND REQUEST TO REVIEW CITY'S LETTER TO CONTRACTOR; RECEIVE AND REVIEW VARIOUS DOCUMENTS FROM R. JOEL INCLUDING LETTER CITY WANTS TO SEND TO CONTRACTOR.	6.20	175.00	1,085.00
03/23/06	MDM	RECEIVE AND REVIEW PLAINTIFF'S MOTION IN OPPOSITION TO REQUEST FOR POSTPONEMENT; STRATEGY SESSION WITH D. JACKSON RE: PREPARATION OF AFFIDAVITS IN RESPONSE TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION; SEVERAL EMAIL CORRESPONDENCES WITH D. JACKSON AND S. BATTLE RE: LOCAL RULES AND	0.80	185.00	148.00

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		DEADLINE FOR RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION, CONTACT WITH CONTRACTOR, REVIEW OF DOCKET, REVIEW OF DOCUMENTS PROVIDED BY CITY AND CONTACT WITH CITY CONTRACTORS RE: APPEARANCE IN LITIGATION.			
03/23/06	KSH	RECEIVE AND REVIEW NUMEROUS EMAILS FROM B. MOSS; RECEIVE AND REVIEW REVISED LETTER FROM D. JACKSON.	0.80	225.00	180.00
03/24/06	MDM	SEVERAL EMAIL CORRESPONDENCES AND PHONE CONFERENCES WITH D. JACKSON RE: CONTACT WITH CONTRACTORS, PREPARATION OF REVISIONS TO LETTER TO CONTRACTOR, AFFIDAVIT AND AVAILABILITY OF CONSULTANTS AND OTHER WITNESS, AND CONTACT WITH CLIENT; EMAIL CORRESPONDENCE WITH K. HENNESSY RE: CARES CORRESPONDENCES AND SOLICITATION, COURT POSTPONEMENT OF HEARING AND CONTACT WITH CLIENT; RECEIVE AND REVIEW ORDER ON POSTPONEMENT OF HEARING.	0.70	185.00	129.50
03/24/06	RDJ	RECEIVE AND REVIEW ORDER GRANTING CITY'S REQUEST FOR POSTPONEMENT OF HEARING ON PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION; PHONE CONFERENCE WITH B. MOSS, CITY MANAGER, RE: ORDER, LETTER FROM CITY TO CONTRACTOR AND WARNING LETTER FROM FDEP TO CONTRACTOR; RECEIVE AND REVIEW WARNING LETTER FROM FDEP TO CONTRACTOR; WORK SESSION WITH M. MOONEY RE: CITY'S LETTER TO CONTRACTOR; REVIEW, EDIT AND FINALIZE LETTER FROM CITY TO CONTRACTOR RE: APPROPRIATE MANAGEMENT OF SITE "A"; PHONE CONFERENCE WITH J. SNIDER OF AMRC RE: POSTPONEMENT OF HEARING; RECEIVE AND REVIEW SIGNED AFFIDAVIT FROM J. SNIDER; PHONE CONFERENCE WITH B. MOSS AND R. JOEL RE: CONCERNS ABOUT EFFECT THAT PRELIMINARY INJUNCTION COULD HAVE IN DELAYING THE PROJECT; RECEIVE AND REVIEW CORRESPONDENCE TO CITY COUNCIL FROM B. MOSS AND CARES; RESEARCH CONCERNING CITIZEN SUITS IN CLEAN AIR ACT AND NESHAP CASES.	3.80	175.00	665.00
03/27/06	RDJ	RECEIVE AND REVIEW DOCUMENT FROM B. MOSS, CITY MANAGER, RE: REPLIES FROM CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS TO THE CITY COUNCIL; RECEIVE AND REVIEW CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS' MOTION FOR LEAVE	5.30	175.00	927.50

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		TO FILE AMENDED AND SUPPLEMENTAL COMPLAINT AND CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS' SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; STRATEGY SESSION WITH M. MOONEY RE: CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT; PHONE CONFERENCE WITH M. MOONEY, B. MOSS TO INFORM HIM OF CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS' MOTION AND AMENDED COMPLAINT AND TO DISCUSS MERITS OF RICO CLAIM; RECEIVE AND REVIEW MEMO FROM S. BATTLE RE: INDEMNIFICATION CLAUSE IN CONTRACT BETWEEN CITY AND CONTRACTOR; RESEARCH CONCERNING NOTICE REQUIREMENTS FOR CITIZEN SUITS UNDER THE CLEAN AIR ACT, ELEMENTS OF NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS AND CLEAN AIR ACT VIOLATIONS.			
03/27/06	MDM	RECEIVE AND REVIEW PLAINTIFF'S MOTION FOR LEAVE TO AMEND THE AMENDED COMPLAINT AND SECOND AMENDED COMPLAINT; PHONE CONFERENCE WITH B. MOSS AND D. JACKSON RE: PLAINTIFF'S LEAVE TO AMEND COMPLAINT, ALLEGATIONS IN SECOND AMENDED COMPLAINT AND STRATEGY; RESEARCH CONCERNING RICO CLAIM; STRATEGY SESSION WITH D. JACKSON AND S. BATTLE RE: STRATEGY, PREPARATION OF RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION, MOTION TO DISMISS, RICO ACTION, DEADLINES TO FILE RESPONSES, RULE 11 MOTION AND RESEARCH; EMAIL CORRESPONDENCE WITH K. HENNESSY RE: STATUS OF MOTION; RECEIVE AND REVIEW CERTIFICATE OF INTERESTED PARTIES.	1.70	185.00	314.50
03/27/06	KSH	RECEIVE AND REVIEW EMAILS FROM CONTRACTOR, R. JOEL AND B. MOSS; RESPOND TO SAME; PHONE CONFERENCE WITH D. JACKSON AND M. MOONEY.	1.00	225.00	225.00
03/27/06	SB	REVIEW CONTRACT BETWEEN CITY OF MARCO ISLAND AS OWNER AND QUALITY ENTERPRISES AS CONTRACTOR PERTAINING TO INDEMNITY CLAUSES) PREPARE MEMORANDUM TO D. JACKSON; WORK SESSION WITH D. JACKSON AND M. MOONEY; BEGIN RESEARCH RE: RICO ACT AND RULE 11 PERTAINING TO SANCTIONS; RESEARCH CHARTER REVIEW COMMITTEE MEMBERS AND CONTACT INFORMATION FOR SAME.	3.70	100.00	370.00
03/28/06	MDM	PREPARE CERTIFICATE OF INTERESTED PARTIES;	1.10	185.00	203.50

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		WORK SESSION WITH K. HENNESSY RE: STRATEGY AND PREPARATION OF RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND COMPLAINT; PREPARATION OF RESPONSE TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION; STRATEGY SESSION WITH D. JACKSON RE: SAME; REVIEW AND REVISE RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO AMEND; RECEIVE AND REVIEW EMAIL TO C. WOODWARD RE: BRIEF AND INTERVENTION BY FRIENDS OF COURT.			
03/28/06	RDJ	RESEARCH CONCERNING ELEMENTS FOR PRELIMINARY INJUNCTION; DRAFT MEMORANDUM IN OPPOSITION TO CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS MOTION FOR PRELIMINARY INJUNCTION; EMAIL CORRESPONDENCE WITH C. WOODWARD, ESQUIRE, REPRESENTING MARCO ISLAND CHAMBER OF COMMERCE AND MARCO ISLAND BOARD OF REALTORS RE: FRIEND OF COURT BRIEF; DRAFT AND REVISE RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED AND SUPPLEMENTAL COMPLAINT.	7.00	175.00	1,225.00
03/28/06	KSH	WORK SESSION WITH M. MOONEY RE: HEARING AND AMENDED COMPLAINT; RECEIVE AND REVIEW EMAIL FROM C. WOODWARD; PHONE CONFERENCE WITH B. MOSS; RECEIVE AND REVIEW EMAIL FROM C. WOODWARD; WORK SESSION WITH D. JACKSON RE: SAME.	3.00	225.00	675.00
03/29/06	MDM	REVIEW, REVISE, AND FINALIZE DEFENDANT'S RESPONSE TO PLAINTIFF'S REQUEST FOR LEAVE TO FILE SECOND AMENDED COMPLAINT AND FILE SECOND AMENDED COMPLAINT AND FILE CERTIFICATE OF INTERESTED PARTIES; RECEIVE AND REVIEW CORRESPONDENCE FROM S. GOLD RE: LETTER OF COMPLIANCE WITH CLEAN AIR ACT.	0.40	185.00	74.00
03/29/06	RDJ	WORK SESSION WITH K. HENNESSY RE: FOLLOW UP WITH AMERICAN MANAGEMENT RESOURCES CORPORATION; PHONE CONFERENCE WITH T. JACOBSEN AND J. SNIDER FROM AMERICAN MANAGEMENT RESOURCES CORPORATION RE: HIRING OF AMERICAN MANAGEMENT RESOURCES CORPORATION BY KRAMER GOLD LAW FIRM TO ANALYZE CONSTRUCTION MATERIALS, SCOPE OF WORK PERFORMED FOR KRAMER GOLD, CONVERSATIONS WITH KRAMER GOLD, HIRING OF AMERICAN MANAGEMENT RESOURCES CORPORATION BY CITY OF MARCO ISLAND AND	1.70	175.00	297.50

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		RELEVANT CONVERSATIONS WITH KRAMER GOLD AND CITY OF MARCO ISLAND RE: SAME; PREPARE SUMMARY OF CONVERSATIONS WITH T. JACOBSEN AND J. SNIDER FOR K. HENNESSY.			
03/29/06	SB	RECEIVE AND REVIEW DOCUMENTS FROM S. GOLD.	0.40	100.00	40.00
03/29/06	KSH	PHONE CONFERENCE WITH R. JOEL TO SCHEDULE CONFERENCE CALL; REVIEW AND REVISE MOTION FOR LEAVE TO FILE AMENDED AND SUPPLEMENTAL COMPLAINT; ATTEND CONFERENCE CALL WITH R. JOEL AND B. MOSS RE: REPRESENTATION; RECEIVE AND REVIEW NOTICE OF APPEARANCE.	2.60	225.00	585.00
03/30/06	MDM	PHONE CONFERENCE WITH K. DEES, PLAINTIFF'S ATTORNEY, RE: NO OPPOSITION TO SCHEDULING REQUESTS IN RESPONSE TO MOTION FOR LEAVE TO AMEND COMPLAINT AND FILING OF MOTION RE: SAME; EMAIL CORRESPONDENCE TO D. JACKSON AND K. HENNESSY RE: MOTION FILED BY PLAINTIFFS RE: RESPONSE TO MOTION TO LEAVE TO AMEND.	0.40	185.00	74.00
03/30/06	SB	WORK SESSION WITH J. SANTOS AND F. SHAY RE: ORGANIZATION OF CLIENT DOCUMENTS FOR BATES STAMPING IN PREPARATION OF FURTHER LITIGATION; BEGIN BATES NUMBERING OF EMAILS AND CONTRACTS.	2.20	100.00	220.00
03/30/06	KSH	RECEIVE AND REVIEW EMAILS FROM R. JOEL, B. MOSS AND D. JACKSON; REVIEW AND REVISE RESPONSE TO TEMPORARY INJUNCTION; OFFICE CONFERENCE WITH D. JACKSON; PHONE CONFERENCE WITH R. JOEL AND B. MOSS; OFFICE CONFERENCE WITH M. MOONEY.	1.50	225.00	337.50
03/30/06	RDJ	PHONE CONFERENCE WITH S. BUNNER, REPRESENTATIVE OF QUALITY ENTERPRISE, RE: SCHEDULING OF CONFERENCE CALL BETWEEN QUALITY AND CITY TO DISCUSS FILING OF PLEADINGS AND PREPARATIONS FOR ANY HEARINGS; DRAFT MEMORANDUM IN OPPOSITION TO CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.'S MOTION FOR PRELIMINARY INJUNCTION; RESEARCH CONCERNING ENVIRONMENTAL PROTECTION ASSOCIATION REGULATIONS FOR ASBESTOS CONTAINING MATERIALS AND SUPPORT FOR MEMORANDUM OPPOSING PRELIMINARY INJUNCTION.	6.50	175.00	1,137.50
03/31/06	SB	REVIEW RELATED CASE ORDER AND TRACK TWO NOTICE PERTAINING TO THE SIXTY DAY DEADLINE TO CONFER WITH OPPOSING COUNSEL AND COMPLETE CASE MANAGEMENT FORM; WORK WITH M. MOONEY RE: SAME.	1.20	100.00	120.00

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03/31/06	KSH	PHONE CONFERENCE WITH B. MOSS RE: STATUS; RECEIVE AND REVIEW SEVERAL EMAILS FROM B. MOSS, R. JOEL AND D. JACKSON; RESPOND TO SAME; PHONE CONFERENCE WITH R. JOEL AND B. MOSS.	1.00	225.00	225.00
03/31/06	MDM	RECEIVE AND REVIEW PLAINTIFF'S NOTICE OF NON OBJECTION TO CITY'S RESPONSE TO CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.'S MOTION FOR LEAVE; RECEIVE AND REVIEW DEPARTMENT OF ENVIRONMENTAL PROTECTION'S CORRESPONDENCE RE: DEPARTMENT OF ENVIRONMENTAL PROTECTION'S WAIVER OF TIME FOR CLEANUP; RECEIVE AND REVIEW PLAINTIFF'S NOTICE OF WITHDRAWAL OF MOTION FOR PRELIMINARY INJUNCTION; RECEIVE AND REVIEW AFFIDAVIT OF J. SNIDER AND M. DANIEL; REVIEW AND EDIT CITY'S MEMORANDUM IN OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION; RECEIVE AND REVIEW ORDER ON PLAINTIFF'S NOTICE OF WITHDRAWAL OF MOTION FOR PRELIMINARY INJUNCTION; SEVERAL EMAIL CORRESPONDENCES AND STRATEGY SESSIONS WITH S. BATTLE RE: RULE 26 DISCLOSURE OBJECTIONS AND MEETING OBLIGATIONS UNDER FEDERAL RULES AND DISCOVERY; RECEIVE AND REVIEW SEVERAL EMAILS RE: CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS' WITHDRAWAL OF MOTION FOR PRELIMINARY INJUNCTION; STRATEGY SESSION WITH D. JACKSON RE: FILING OF RESPONSE IN OPPOSITION TO MOTION FOR PRELIMINARY INJUNCTION DESPITE CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.'S WITHDRAWAL OF MOTION.	1.80	185.00	333.00
03/31/06	RDJ	DRAFT, EDIT AND FINALIZE MEMORANDUM IN OPPOSITION TO CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.'S MOTION FOR PRELIMINARY INJUNCTION; RECEIVE AND REVIEW SITE PLAN FOR CITY OF MARCO ISLAND ROAD CONSTRUCTION PROJECT; PHONE CONFERENCE WITH M. DANIEL, PROJECT MANAGER, RE: STATUS OF CONSTRUCTION PROJECT; PHONE CONFERENCES WITH B. MOSS, CITY MANAGER, RE: CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.'S WITHDRAWAL OF MOTION FOR PRELIMINARY INJUNCTION; DRAFT MOTION TO DISMISS AMENDED COMPLAINT.	6.10	175.00	1,067.50
04/03/06	MDM	SEVERAL PHONE CONFERENCES AND STRATEGY SESSIONS WITH D. JACKSON RE: PREPARATION AND	0.60	185.00	111.00

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		FILING OF MOTION TO DISMISS THE AMENDED COMPLAINT, CONTACT WITH JUDGE'S CLERK'S OFFICE RE: MOTION FOR LEAVE TO AMEND SECOND AMENDED COMPLAINT AND CITY'S RESPONSE TO MOTION FOR LEAVE AND COURT RULING ON MOTION TOMORROW AND FILING OF SAME.			
04/03/06	KSH	RECEIVE AND REVIEW EMAIL RE: ORDER FROM COURT; RECEIVE AND REVIEW EMAIL FROM W. MOSS; WORK SESSION WITH D. JACKSON RE: FILING MOTION TO DISMISS.	1.20	225.00	270.00
04/03/06	RDJ	DRAFT, EDIT AND FINALIZE MOTION TO DISMISS AMENDED COMPLAINT; RESEARCH CONCERNING STANDING AND INJURY IN FACT IN ENVIRONMENTAL CASES, NOTICE REQUIREMENTS IN CITATIONS SUITS, GENERAL ALLEGATIONS RE: VIOLATIONS OF CLEAN AIR ACT; PHONE CONFERENCES WITH CLERK'S OFFICE RE: PENDING MOTION FOR LEAVE TO FILE AMENDED COMPLAINT.	6.80	175.00	1,190.00
04/04/06	MDM	CONFERENCE CALL WITH W. MOSS, R. JOEL, S. BUNNER, D. JACKSON AND K. HENNESSY RE: STRATEGY, PREPARATION OF RESPONSIVE PLEADING TO SECOND AMENDED COMPLAINT, PREPARATION OF RULE 11 SANCTIONS MOTION, PREPARATION OF MOTION TO STRIKE RULE 26 CONFERENCE REQUIREMENTS AND OUTSTANDING MOTIONS BEFORE THE COURT, PIPE REMOVAL STATUS, CONTACT WITH THE DEPARTMENT OF ENVIRONMENTAL PROTECTION, PLAINTIFF'S REQUEST FOR INJUNCTIVE RELIEF, FILING OF MOTION TO DISMISS THE AMENDED COMPLAINT, SHADE MEETING WITH CITY COUNCIL RE: LITIGATION; RECEIVE AND REVIEW CITIZENS ADVOCATING RESPONSIVE ENVIRONMENTAL SOLUTIONS, INC.'S NOTICE OF NON OBJECTION BY PLAINTIFF TO QUALITY'S REQUEST FOR LEAVE TO FILE RESPONSE TO SECOND AMENDED COMPLAINT; RESEARCH CONCERNING REVIEW OF RULE 11 RE: SAFE HARBOR REQUIREMENT BEFORE FILING MOTION FOR SANCTIONS; RECEIVE AND REVIEW ORDER ON PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT; RECEIVE AND REVIEW QUALITY'S RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE AMENDED SUPPLEMENTAL COMPLAINT; REVIEW SITE PLAN OF VETERAN COMMUNITY PARK IN PREPARATION FOR CONFERENCE CALL; RECEIVE AND REVIEW NOTICE OF APPEARANCE BY QUALITY COUNSEL; EMAIL	2.80	185.00	518.00

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		CORRESPONDENCE WITH B. LAWRENCE RE: MISSING PLEADINGS AND REQUEST FOR DOCUMENTS.			
04/04/06	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH CITY AND QUALITY; RECEIVE AND REVIEW MOTION TO DISMISS; RECEIVE AND REVIEW RESPONSE FROM QUALITY; WORK SESSION WITH D. JACKSON; RECEIVE AND REVIEW MEMO IN OPPOSITION TO INJUNCTION; RECEIVE AND REVIEW NOTICE OF APPEARANCE; RECEIVE AND REVIEW NOTICES OF FILING AFFIDAVITS.	2.90	225.00	652.50
04/04/06	RDJ	CONFERENCE CALL WITH M. MOONEY, K. HENNESSY, W. MOSS, R. JOEL AND S. BUNNER; STRATEGY SESSION WITH M. MOONEY, K. HENNESSY RE: MOTIONS AND DISCOVERY; DRAFT MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; RESEARCH CONCERNING PLEADING REQUIREMENTS FOR REQUESTS FOR INJUNCTIVE RELIEF AND REQUESTS FOR CIVIL PENALTIES UNDER THE CLEAN AIR ACT; RECEIVE AND REVIEW ORDER GRANTING MOTION FOR LEAVE TO FILE AMENDED COMPLAINT.	5.30	175.00	927.50
04/05/06	MDM	STRATEGY SESSION AND MEETING WITH D. JACKSON, S. BATTLE AND K. HENNESSY RE: DOCUMENT MANAGEMENT AND ORGANIZATION, ISSUE IDENTIFICATION AND PREPARATION FOR RULE 26 DISCLOSURE REQUIREMENTS; RESEARCH CONCERNING RULE 11 SANCTIONS REQUIREMENT IN PREPARATION FOR DRAFTING MOTION FOR SANCTIONS.	1.60	185.00	296.00
04/05/06	KSH	ATTEND STRATEGY SESSION.	1.00	225.00	225.00
04/05/06	RDJ	WORK SESSION WITH M. MOONEY, S. BATTLE, J. SANTOS AND F. SHAY RE: UTILIZATION OF SUMMATION FOR ORGANIZING EMAILS AND OTHER DOCUMENTS PERTAINING TO CARES' LAWSUIT; PHONE CONFERENCE WITH W. MOSS RE: ORDER GRANTING CARES' MOTION FOR LEAVE TO STRIKE SECOND AMENDED COMPLAINT; DRAFT MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; DRAFT MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT.	4.30	175.00	752.50
04/05/06	FS	ATTEND STRATEGY MEETING ON ORGANIZATION OF EVIDENTIARY DOCUMENTS.	0.70	110.00	77.00
04/05/06	SB	CONTINUE ORGANIZATION OF DOCUMENTS FOR BATES LABELING AND ENTERING INTO SUMMATION.	1.50	100.00	150.00
04/06/06	KSH	RECEIVE AND REVIEW EMAIL FROM QUALITY'S ATTORNEY; RESPOND TO SAME; EMAIL TO W. MOSS.	0.50	225.00	112.50

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04/06/06	RDJ	RESEARCH CONCERNING STRIKING OR DISMISSING IMPROPER PARTIES; DRAFT AND REVISE MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT.	1.60	175.00	280.00
04/06/06	SB	CONTINUE ORGANIZATION AND BATES LABELING OF CLIENT DOCUMENTS FOR UTILIZATION IN DOCUMENT PRODUCTION REGARDING ANTICIPATED DISCOVERY REQUESTS.	1.00	100.00	100.00
04/07/06	MDM	CONTINUE RESEARCH CONCERNING RULE 11, ELEMENTS OF RICO ACTION FOR RULE 11 MOTION AND TITLE; DRAFT RULE 11 LETTER REQUIRED BY RULE; CONTINUE TO PREPARE AND DRAFT RULE 11 MOTION FOR SANCTIONS AND MEMORANDUM OF LAW; WORK SESSION WITH F. SHAY AND S. BATTLE RE: ORGANIZATION OF FILE, EMAILS AND CITY RECORDS IN ANTICIPATION OF DISCOVERY EXCHANGE.	3.60	185.00	666.00
04/07/06	RDJ	DRAFT AND REVISE MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; DRAFT AND REVISE MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; RESEARCH CONCERNING NOTICE REQUIREMENTS, AUTHORITY TO BRING CITIZEN SUITS AND PAYMENT OF CIVIL PENALTIES UNDER THE CLEAN AIR ACT; PHONE CONFERENCE WITH J. TENNEY RE: AMICUS BRIEF ON BEHALF OF MARCO ISLAND CHAMBER OF COMMERCE, ET AL.	5.60	175.00	980.00
04/07/06	FS	STRATEGY SESSION ON ORGANIZATION OF PRIVILEGED AND POTENTIAL EVIDENTIARY DOCUMENTS USING SUMMATION.	1.00	110.00	110.00
04/07/06	KSH	RECEIVE AND REVIEW EMAILS FROM W. MOSS; RECEIVE AND REVIEW EMAILS FROM R. JOEL; RESPOND TO SAME; WORK SESSION WITH M. MOONEY AND D. JACKSON.	1.00	225.00	225.00
04/07/06	SB	BATES LABEL DOCUMENTS FOR ENTRY INTO SUMMATION IN PREPARATION FOR UTILIZATION IN ANTICIPATED DISCOVERY.	1.40	100.00	140.00
04/09/06	RDJ	DRAFT AND REVISE MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; DRAFT AND REVISE MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; RESEARCH CONCERNING REDRESSABILITY REQUIREMENT TO ESTABLISH STANDING AND ITS APPLICABILITY TO CITIZEN SUITS IN ENVIRONMENTAL CASES, SOVEREIGN IMMUNITY, LIMITATIONS ON CLAIMS AGAINST GOVERNMENT EMPLOYEES ACTING WITHIN	3.90	175.00	682.50

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		THE SCOPE OF THEIR EMPLOYMENT.			
04/10/06	RDJ	STRATEGY SESSION WITH M. MOONEY RE: MOTION TO STRIKE AND MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; RESEARCH CONCERNING REQUIREMENT TO ALLEGE CITY EMPLOYEES ARE ACTING OUTSIDE THE SCOPE OF THEIR EMPLOYMENT, PLEADING REQUIREMENT RE: DEMANDS FOR JURY TRIAL; DRAFT AND EDIT MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; DRAFT AND EDIT MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT.	5.80	175.00	1,015.00
04/10/06	MDM	SEVERAL STRATEGY SESSIONS WITH D. JACKSON RE: SEPARATION OF ALLEGATIONS IN MOTION TO DISMISS AND MOTION TO STRIKE; PREPARATION OF MOTION TO DISMISS ARGUMENT RE: RICO CLAIM; CONTINUE RESEARCH CONCERNING RICO CAUSE OF ACTION AND FEDERAL RULES OF CIVIL PROCEDURE RULE 11 FOR SANCTIONS MOTION; DRAFT MOTION FOR RULE 11 SANCTIONS AND SUPPORTING MEMORANDUM OF LAW RE: CITY, R. JOEL AND W. MOSS; SEVERAL EMAIL CORRESPONDENCES TO K. HENNESSY AND D. JACKSON RE: DOCUMENT RETENTION, PRIVILEGE AND PRODUCTION FROM CITY.	5.70	185.00	1,054.50
04/10/06	KSH	REVIEW AND REVISE MOTION TO STRIKE; WORK SESSION WITH D. JACKSON RE: MOTIONS; RECEIVE AND REVIEW SEVERAL EMAILS FROM W. MOSS AND R. JOEL.	1.10	225.00	247.50
04/11/06	RDJ	DRAFT AND EDIT MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; RESEARCH CONCERNING LIMITATIONS ON CAUSES OF ACTION AGAINST GOVERNMENT EMPLOYEES, STANDARDS FOR STRIKING SCANDALOUS AND UNSUPPORTED ALLEGATIONS; DRAFT AND EDIT MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; DRAFT MOTION FOR RULE 11 SANCTIONS RE: REQUESTS FOR INJUNCTIVE RELIEF.	6.50	175.00	1,137.50
04/11/06	MDM	DRAFT MOTION TO DISMISS ON RICO COUNT; REVISE AND EDIT MOTION TO DISMISS; REVISE AND EDIT MOTION FOR SANCTIONS; STRATEGY SESSION WITH D. JACKSON RE: BASIS FOR SANCTIONS FOR PLAINTIFF'S MOTION FOR INJUNCTIVE RELIEF, WITHDRAWAL AND PUBLICITY OF SAID MOTION.	2.10	185.00	388.50
04/11/06	SB	SUMMARIZE DOCUMENTS IN SUMMATION IN	2.20	100.00	220.00

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		PREPARATION OF FURTHER LITIGATION.			
04/11/06	KSH	RECEIVE AND REVIEW EMAILS RE: CARES FROM W. MOSS; RECEIVE AND REVIEW LETTER FROM S. GOLD RE: CLEAN AIR ACT NOTICE; WORK SESSION WITH M. MOONEY AND D. JACKSON; RECEIVE AND REVIEW MOTION TO DISMISS; RECEIVE AND REVIEW MOTION TO STRIKE; WORK SESSION WITH M. MOONEY RE: SANCTIONS.	2.00	225.00	450.00
04/12/06	RDJ	DRAFT, EDIT AND FINALIZE MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; REVISE AND FINALIZE MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; RESEARCH CONCERNING NOTICE REQUIREMENTS FOR CITIZEN SUITS UNDER CLEAN AIR ACT; PHONE CONFERENCE WITH K. HENNESSY, M. MOONEY, W. MOSS AND R. JOEL RE: PRIVILEGED COMMUNICATIONS, PREPARED MOTIONS, STATUS OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION MATTER; REVISE MOTION FOR RULE 11 SANCTIONS.	5.50	175.00	962.50
04/12/06	MDM	EMAIL CORRESPONDENCE WITH K. HENNESSY RE: CONFERENCE CALL WITH CITY OFFICIALS ON DISCOVERY AND ATTORNEY/CLIENT PRIVILEGES; STRATEGY SESSION WITH D. JACKSON AND K. HENNESSY RE: REVISIONS TO MOTION FOR SANCTIONS, ADDITION OF ALLEGATIONS RE: IMPROPER NOTICE AND MISREPRESENTATION BY PLAINTIFFS TO COURT; REVISE, EDIT AND ADD ADDITIONAL ARGUMENT RE: MISREPRESENTATION OF NOTICE BY PLAINTIFFS; EMAIL CORRESPONDENCE TO W. MOSS AND R. JOEL RE: REVIEW OF MOTION TO DISMISS, MOTION TO STRIKE AND COVER LETTER RE: SAME; CONFERENCE CALL WITH W. MOSS, R. JOEL, K. HENNESSY AND D. JACKSON RE: PROTECTION OF ATTORNEY/CLIENT PRIVILEGES AND WORK PRODUCT MATERIAL, CREATION OF SEPARATE FILE, UPCOMING SHADE MEETING, MOTION FOR SANCTIONS, MOTION TO STRIKE, MOTION TO DISMISS, COVER LETTER TO S. GOLD RE: MOTION FOR SANCTIONS, STATUS OF OTHER LITIGATION BY CARES AND UPCOMING MEETING WITH DEP.	4.10	185.00	758.50
04/12/06	KSH	RECEIVE AND REVIEW MOTION TO STRIKE; REVIEW AND REVISE RULE 11 LETTER TO S. GOLD; PREPARE FOR AND ATTEND CONFERENCE CALL; WORK SESSION WITH M. MOONEY RE: RULE 26 DISCLOSURES; RECEIVE AND REVIEW MOTION FOR SANCTIONS.	2.50	225.00	562.50

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04/13/06	RDJ	REVIEW AND REVISE MOTION FOR RULE 11 SANCTIONS; RESEARCH CONCERNING MOTIONS FOR RULE 11 SANCTIONS; PHONE CONFERENCE WITH S. GOLD TO GET UPDATED CONTACT INFORMATION AND TO CONFER RE: MOTION TO STRIKE AS REQUIRED UNDER LOCAL RULES; PHONE CONFERENCES WITH R. JOEL, W. MOSS AND M. MOONEY RE: VARIOUS MODIFICATIONS TO MOTION TO STRIKE, MOTION TO DISMISS AND MOTION FOR SANCTIONS; REVISE MOTION TO STRIKE AND MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT.	5.90	175.00	1,032.50
04/13/06	MDM	REVIEW R. JOEL'S COMMENTS ON MOTION TO STRIKE AND MOTION TO DISMISS; STRATEGY SESSION WITH K. HENNESSY RE: REVISIONS TO MOTION FOR SANCTIONS; REVIEW, REVISE AND EDIT MOTION FOR SANCTIONS AND CONDENSE DISCUSSION RE: INJUNCTIVE RELIEF TO FOOTNOTE; REVISE AND EDIT RULE 11 SANCTIONS LETTER; EMAIL RESPONSE TO R. JOEL'S COMMENTS ON MOTION TO STRIKE, MOTION TO DISMISS AND RULE 11 LETTER AND MOTION FOR SANCTIONS; SEVERAL CONFERENCE CALLS WITH R. JOEL, B. MOSS AND D. JACKSON RE: COMMENTS AND REVISIONS TO MOTION TO STRIKE, MOTION TO DISMISS AND MOTION FOR SANCTIONS AND RULE 11 SANCTIONS LETTER, DEPARTMENT OF ENVIRONMENTAL PROTECTION MEETING AND SCHEDULING OF CONFERENCE WITH OPPOSING COUNSEL.	4.30	185.00	795.50
04/14/06	RDJ	PREPARE AND FILE NOTICE OF APPEARANCE ON BEHALF OF B. MOSS AND R. JOEL; REVISE, FINALIZE AND FILE MOTION TO STRIKE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT AND MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; REVISE AND FINALIZE MOTION FOR RULE 11 SANCTIONS AND LETTER RE: SAME; SEND LETTER AND MOTION FOR RULE 11 SANCTIONS TO S. GOLD.	2.10	175.00	367.50
04/14/06	MDM	SEVERAL EMAIL CORRESPONDENCES AND PHONE CONFERENCE WITH D. JACKSON RE: FINALIZING MOTION FOR SANCTIONS, FILING OF MOTION TO STRIKE AND MOTION TO DISMISS, PREPARATION OF NOTICE OF APPEARANCE AND CLERK'S FILING OF SECOND AMENDED COMPLAINT.	0.50	185.00	92.50
04/17/06	MDM	RECEIVE AND REVIEW DEFENDANT QUALITY'S MOTION TO DISMISS SECOND AMENDED COMPLAINT.	0.50	185.00	92.50

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04/17/06	RDJ	EMAIL CORRESPONDENCE WITH S. BUNNER RE: SCHEDULING OF VARIOUS MEETINGS; RECEIVE AND REVIEW QUALITY ENTERPRISES USA'S MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; RECEIVE AND REVIEW AMICUS BRIEF IN SUPPORT OF CITY OF MARCO ISLAND FROM C. WOODWARD REPRESENTING MARCO ISLAND CHAMBER OF COMMERCE, ET AL.	1.80	175.00	315.00
04/17/06	KSH	RECEIVE AND REVIEW EMAIL WITH MOTIONS TO CLIENT; RECEIVE AND REVIEW EMAILS RE: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION MEETING; RECEIVE AND REVIEW LETTER TO S. GOLD FOR RULE 11 SANCTIONS; RECEIVE AND REVIEW MOTION TO DISMISS; RECEIVE AND REVIEW EMAIL FROM S. BUNNER; RECEIVE AND REVIEW MOTION TO STRIKE.	1.50	225.00	337.50
04/18/06	MDM	REVIEW AND COMMENT ON AMICUS BRIEF BY CHAMBER OF COMMERCE AND MARCO BUSINESS; STRATEGY SESSION WITH D. JACKSON RE: SAME.	1.20	185.00	222.00
04/18/06	SB	CONTINUE LABELING AND SUMMARIZING CONTRACTS.	0.50	100.00	50.00
04/18/06	RDJ	EMAIL CORRESPONDENCE WITH S. GOLD RE: RULE 26 MEETING; PHONE CONFERENCE WITH S. BUNNER RE: SCHEDULING OF VARIOUS MEETINGS; RESEARCH CONCERNING FILING OF AN AMICUS BRIEF IN A UNITED STATES DISTRICT COURT CASE AND LOCAL RULES RE: AMICUS BRIEFS; PHONE CONFERENCE WITH J. TENNEY RE: AMICUS BRIEF TO BE FILED IN SUPPORT OF CITY OF MARCO ISLAND BY MARCO ISLAND CHAMBER OF COMMERCE, ET AL.	1.50	175.00	262.50
04/19/06	MDM	PHONE CONFERENCE AND DRAFT CORRESPONDENCE WITH K. DEES RE: INCORRECT SERVICE OF CIRCUIT CIVIL PLEADING AND REQUEST FOR CORRECTION OF CERTIFICATE OF SERVICE.	0.40	185.00	74.00
04/20/06	RDJ	RESEARCH CONCERNING SOVEREIGN IMMUNITY AND NOTICE PROVISIONS UNDER FLORIDA STATUTES; WORK SESSION WITH M. MOONEY RE: RESEARCH.	1.50	175.00	262.50
04/20/06	KSH	RECEIVE AND REVIEW LETTER TO K. DEES RE: RESTRAINING ORDER; WORK SESSION WITH D. JACKSON.	0.50	225.00	112.50
04/20/06	MDM	RECEIVE AND REVIEW EMAIL RE: PLAINTIFF'S COUNSEL'S RELOCATION OF LAW FIRM; STRATEGY SESSION WITH K. HENNESSY RE: DISCOVERY AND PREPARATION FOR RULE 26 MEETING AND DISCLOSURES AND REQUIREMENTS AND ADDITIONAL MOTION TO DISMISS GROUNDS; EMAIL	1.10	185.00	203.50

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		CORRESPONDENCE TO D. JACKSON RE: RESEARCH ADDITIONAL MOTION TO DISMISS GROUNDS RELATING TO SOVEREIGN IMMUNITY, RESPONSE TIME FOR PLAINTIFF, RULE 26 DISCLOSURES AND DISCOVERY REQUIREMENTS; STRATEGY SESSION WITH D. JACKSON RE: SOVEREIGN IMMUNITY STATUTES, POSSIBLE APPLICABILITY TO LITIGATION.			
04/21/06	RDJ	EMAIL CORRESPONDENCE WITH S. BUNNER, S. GOLD, K. DEES RE: SCHEDULING OF RULE 26 MEETING; REVIEW CASE MANAGEMENT REPORT AND LOCAL RULES TO PREPARE FOR RULE 26 MEETING; ORGANIZE RESEARCH AND VARIOUS DOCUMENTS FOR FILE AND PREPARATION OF DISCOVERY REQUESTS.	2.80	175.00	490.00
04/24/06	MDM	EMAIL CORRESPONDENCE WITH S. BATTLE AND D. JACKSON RE: PREPARATION OF INTERESTED PARTY CERTIFICATE FOR W. MOSS AND R. JOEL.	0.20	185.00	37.00
04/24/06	RDJ	RESEARCH CONCERNING SOVEREIGN IMMUNITY RE: CLEAN AIR ACT VIOLATIONS AND RICO CLAIMS, REQUIREMENTS FOR RULE 26 MEETINGS, CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENTS; PHONE CONFERENCES WITH ATTORNEY FOR CARES RE: REQUESTS FOR ADDITIONAL TIME TO RESPOND TO MOTIONS TO DISMISS AND STRIKE CARES' SECOND AMENDED AND SUPPLEMENTAL COMPLAINT.	5.30	175.00	927.50
04/25/06	SB	CONFIRM FEDERAL RULES RE: DISCOVERY DEADLINES.	0.40	100.00	40.00
04/25/06	MDM	RECEIVE AND REVIEW NOTICE OF SPECIAL CLOSED MEETING; PHONE CONFERENCE WITH K. DEES RE: REQUEST FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO MOTION TO DISMISS AND MOTION TO STRIKE; REVIEW CIVIL RULES OF PROCEDURE RE: TIMEFRAME FOR PLAINTIFF'S RESPONSE; PREPARE CORRESPONDENCE TO K. DEES CONFIRMING EXTENSION; RECEIVE AND REVIEW PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO MOTION TO DISMISS; RECEIVE AND REVIEW PLAINTIFF'S RESPONSE TO QUALITY'S MOTION TO DISMISS; EMAIL CORRESPONDENCE WITH D. JACKSON AND K. HENNESSY RE: PLAINTIFF'S REQUEST FOR EXTENSION AND LOCAL RULE REQUIREMENTS RE: SAME.	1.40	185.00	259.00
04/25/06	KSH	RECEIVE AND REVIEW EMAILED PUBLIC NOTICES FROM W. MOSS; OFFICE CONFERENCE WITH M. MOONEY RE: EXTENSION TO K. DEES FOR RESPONSE.	0.50	225.00	112.50
04/26/06	MDM	RECEIVE AND REVIEW NOTICE OF FILINGS, NOTICES	0.40	185.00	74.00

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		AND LETTERS PREPARED BY KRAMER GOLD FIRM PRIOR TO INITIATION OF LITIGATION.			
04/26/06	RDJ	RECEIVE AND REVIEW CARES' MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT QUALITY ENTERPRISES USA'S MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT; PREPARE FOR MEETING RE: DISCOVERY UNDER RULE 26.	1.50	175.00	262.50
04/27/06	SB	RECEIVE AND REVIEW MIDDLE DISTRICT FILING RE: CONFLICT OF INTEREST FORM; CONTINUE SUMMARIZATION OF CLIENT DOCUMENTS INCLUDING THE CONTRACTS.	1.70	100.00	170.00
04/27/06	RDJ	RECEIVE AND REVIEW EXHIBITS TO CARES' MEMORANDUM IN OPPOSITION TO QUALITY'S MOTION TO DISMISS SECOND AMENDED AND SUPPLEMENTAL COMPLAINT RE: NOTICE OF INTENT TO FILE SUIT PURSUANT TO THE CLEAN AIR ACT; PHONE CONFERENCE WITH W. MOSS RE: CARES' ATTORNEY SENDING NOTICE OF INTENT TO FILE SUIT TO CITY ATTORNEY'S OFFICE; PHONE CONFERENCES AND EMAIL CORRESPONDENCE WITH GOODLETTE COLEMAN & JOHNSON, CITY'S ATTORNEY, RE: NOTICES OF INTENT TO FILE SUIT; RECEIVE AND REVIEW FROM CITY'S ATTORNEY NOTICES OF INTENT TO FILE SUIT FROM CARES DATED MARCH 9, 2006 AND MARCH 14, 2006; RECEIVE AND REVIEW LETTER FROM CARES' ATTORNEY RE: MOTION FOR SANCTIONS; PHONE CONFERENCES WITH W. MOSS AND R. JOEL RE: POSSIBILITY OF CONFLICTS WITH JUDGES; PREPARE AND FILE CERTIFICATES OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENTS FOR W. MOSS AND R. JOEL.	2.70	175.00	472.50
04/27/06	MDM	STRATEGY SESSION WITH D. JACKSON RE: PREPARATION OF CERTIFICATES OF INTERESTED PARTIES FOR BW MOSS AND R. JOEL AND NOTICES RECEIVED BY CITY'S GENERAL COUNSEL; EMAIL CORRESPONDENCE TO D. JACKSON AND K. HENNESSY RE: SAME; RECEIVE AND REVIEW CORRESPONDENCE FROM S. GOLD RE: WITHDRAWAL OF MOTION FOR SANCTIONS; RECEIVE AND REVIEW EMAIL FROM CARES TO GOVERNOR AND DEPARTMENT OF ENVIRONMENTAL PROTECTION'S RESPONSE TO CARES COMPLAINT.	0.40	185.00	74.00
04/27/06	KSH	OFFICE CONFERENCE WITH D. JACKSON; RECEIVE AND REVIEW EMAIL OF LETTERS TO R. YOVANOVICH; RECEIVE AND REVIEW EMAILS FROM W. MOSS;	1.00	225.00	225.00

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		RECEIVE AND REVIEW LETTER FROM S. GOLD RE: RULE 11 SANCTIONS; RECEIVE AND REVIEW LETTER FROM S. GOLD TO R. YOVANOVICH; OFFICE CONFERENCE WITH D. JACKSON; RECEIVE AND REVIEW EMAIL FROM S. GOLD.			
04/28/06	RDJ	DRAFT REQUEST FOR ADMISSIONS; ORGANIZE DOCUMENTS AND PREPARE FOR MEETING RE: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S ENFORCEMENT MATTER, EXECUTIVE SESSION WITH MARCO ISLAND CITY COUNCIL AND RULE 26 DISCOVERY MEETING WITH ATTORNEYS FOR QUALITY AND CARES; EMAIL CORRESPONDENCE WITH ATTORNEY FOR QUALITY RE: REMEDIATION PLAN TO BE SUBMITTED TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION.	5.10	175.00	892.50
04/28/06	MDM	STRATEGY SESSION WITH K. HENNESSY AND D. JACKSON RE: REVISION AND GROUNDS FOR MOTION FOR SANCTIONS, OUTLINE FOR UPCOMING EXECUTIVE SESSION WITH CITY, PREPARATION FOR MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION, QUALITY REPRESENTATIVES AND QUALITY ATTORNEY, PREPARATION OF RESPONSE TO S. GOLD'S LETTER RE: MOTION FOR SANCTIONS AND NOTICE OF MEDIATION FOR CIRCUIT COURT PROCEEDING.	0.90	185.00	166.50
05/01/06	MDM	RECEIVE AND REVIEW ORDER ON PLAINTIFF'S REQUEST FOR ENLARGEMENT OF TIME; DRAFT CORRESPONDENCE TO S. GOLD RE: CORRESPONDENCE RESPONDING TO MOTION FOR SANCTIONS; RECEIVE AND REVIEW PRESS RELEASE FROM C.A.R.E.S. RE: VICTORIES.	0.50	185.00	92.50
05/01/06	SB	REVIEW C.A.R.E.S. NEWS RELEASE TO SUPPORTERS; REVIEW SUNBIZ CORPORATE INFORMATION IN SEARCH OF C.A.R.E.S.' OFFICER NAMES; REVIEW EMAILS CONTAINED WITHIN DOCUMENTS RECEIVED FROM THE CITY OF MARCO FOR C.A.R.E.S' INDIVIDUAL MEMBERS; PREPARE EMAIL MEMO TO D. JACKSON RE: SAME.	0.50	100.00	50.00
05/01/06	RDJ	TRAVEL TO AND FROM MARCO ISLAND CITY HALL FOR VARIOUS MEETINGS; PREPARE FOR AND ATTEND MEETING WITH K. HENNESSY, R. JOEL AND M. DANIEL FROM THE CITY OF MARCO ISLAND AND REPRESENTATIVES FROM QUALITY ENTERPRISES TO DISCUSS UPCOMING MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AND PROPOSED REMEDIATION PLAN FOR	8.40	175.00	1,470.00

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		CONSTRUCTION SITE; MEETING WITH K. HENNESSY, W. MOSS, R. JOEL, R. YOVANOVICH AND ATTORNEYS REPRESENTING CITY OF MARCO ISLAND IN STATE COURT MATTER TO DISCUSS STATUS OF PENDING LAWSUITS; PREPARE FOR AND ATTEND "SHADE" MEETING WITH K. HENNESSY AND CITY COUNCIL FOR CITY OF MARCO ISLAND TO DISCUSS STRATEGIES RE: PENDING LAWSUIT FILED IN FEDERAL COURT BY C.A.R.E.S.			
05/01/06	KSH	PREPARE FOR AND ATTEND MEETING WITH QUALITY REPRESENTATIVES IN MARCO ISLAND; PREPARE FOR AND ATTEND MEETING WITH CITY'S ATTORNEYS IN BOND CASE; RECEIVE AND REVIEW EMAIL FROM W. MOSS WITH CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.'S PUBLIC RECORDS.	8.00	225.00	1,800.00
05/02/06	MDM	REVISE CORRESPONDENCE TO S. GOLD RE: MOTION FOR SANCTIONS AND WITHDRAWAL OF PART OF MOTION AND REQUEST TO SERVE PROPER PARTIES; REVIEW RULE 26(A) DISCLOSURE REQUIREMENTS IN PREPARATION FOR MEETING WITH S. BUNNER AND S. GOLD PURSUANT TO RULE; RECEIVE AND REVIEW PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION TO CITY'S MOTION TO DISMISS AND MOTION TO STRIKE; STRATEGY SESSION WITH D. JACKSON RE: SAME; RECEIVE AND REVIEW AMICUS CURIAE IN SUPPORT OF CITY FILED BY CHAMBER OF COMMERCE; STRATEGY SESSION WITH K. HENNESSY AND D. JACKSON RE: UPCOMING MEETING WITH DEP AND QUALITY AND RULE 26 MEETING WITH OPPOSING COUNSEL AND MEETING WITH CITY OFFICIALS; PREPARE DRAFT RULE 26 OUTLINE WITH D. JACKSON; RECEIVE AND REVIEW EMAIL CORRESPONDENCE FROM S. GOLD RE: THREAT OF SANCTIONS; MOTION OF WITHDRAWAL OF MOTION AND UPCOMING MEETING; RECEIVE AND REVIEW ORDER DENYING AMICUS BRIEF FILED BY MARCO CHAMBER.	2.50	185.00	462.50
05/02/06	RDJ	RECEIVE AND REVIEW C.A.R.E.S.' MEMORANDA OF LAW IN OPPOSITION TO THE MOTIONS TO DISMISS AND STRIKE THE SECOND AMENDED AND SUPPLEMENTAL COMPLAINT FILED ON BEHALF OF THE CITY OF MARCO ISLAND, W. MOSS AND R. JOEL; DRAFT LETTER TO W. MOSS AND R. JOEL RE: FILING OF C.A.R.E.S.' MEMORANDA OF LAW OPPOSING MOTIONS TO DISMISS AND STRIKE REVIEW DRAFT PIPE REMOVAL OPERATIONS AND DEBRIS PILE	6.80	175.00	1,190.00

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		MANAGEMENT PLAN PREPARED BY CONSULTANTS FOR QUALITY ENTERPRISES; WORK SESSION WITH M. MOONEY AND K. HENNESSY TO PREPARE FOR RULE 26 AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION MEETINGS; RECEIVE AND REVIEW MOTION FOR LEAVE TO FILE BRIEF AMICUS CURIAE FROM MARCO ISLAND CHAMBER OF COMMERCE, ET AL.; RECEIVE AND REVIEW COURT'S ORDER DENYING MOTION FOR LEAVE TO FILE BRIEF AMICUS CURIAE; PHONE CONFERENCE WITH C. WOODWARD, ATTORNEY FOR MARCO ISLAND CHAMBER OF COMMERCE, AND W. MOSS RE: ORDER; PHONE CONFERENCE WITH R. JOEL RE: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION MEETING.			
05/02/06	KSH	RECEIVE AND REVIEW EMAIL FROM S. GOLD; RESPOND TO SAME; RECEIVE AND REVIEW DENIAL; RECEIVE AND REVIEW EMAIL FROM P. GENZLER OF REQUEST FOR AMICUS BRIEF; PHONE CONFERENCE WITH P. GENZLER.	1.00	225.00	225.00
05/03/06	MDM	TRAVEL TO AND FROM FT. MYERS FOR MEETING AT DEPARTMENT OF ENVIRONMENTAL PROTECTION WITH QUALITY REPRESENTATIVES, DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT STAFF, R. JOEL AND D. JACKSON.	8.00	185.00	1,480.00
05/03/06	RDJ	TRAVEL TO AND FROM FT. MYERS FOR MEETINGS; ATTEND MEETING WITH M. MOONEY AND R. JOEL FROM THE CITY OF MARCO ISLAND, REPRESENTATIVES FROM QUALITY ENTERPRISES, AND THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF TO DISCUSS PROPOSAL RE: FUTURE PIPE REMOVAL AND DEBRIS PILE MANAGEMENT PLAN AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S PROPOSED SETTLEMENT RE: ALLEGED VIOLATIONS; ATTEND AND FOLLOW UP MEETING WITH M. MOONEY, R. JOEL AND REPRESENTATIVES FROM QUALITY; ATTEND MEETING WITH M. MOONEY AND ATTORNEYS FOR QUALITY ENTERPRISES AND C.A.R.E.S. TO PREPARE CASE MANAGEMENT REPORT AS REQUIRED UNDER RULE 26.	8.00	175.00	1,400.00
05/03/06	KSH	RECEIVE AND REVIEW EMAIL FROM S. GOLD; PHONE CONFERENCE WITH M. MOONEY AND D. JACKSON; RECEIVE AND REVIEW EMAILS FROM W. MOSS; RECEIVE AND REVIEW EMAILS FROM R. JOEL; WORK SESSION WITH M. MOONEY AND D. JACKSON; PHONE CONFERENCE WITH W. MOSS AND R. JOEL.	1.00	225.00	225.00

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05/04/06	MDM	REVIEW DOCUMENTS PRODUCED FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION FILE; STRATEGY SESSION WITH K. HENNESSY AND D. JACKSON RE: MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AND MEETING WITH OPPOSING COUNSEL, PREPARATION OF SUMMARY OF SAME AND PREPARATION OF MOTION FOR SANCTIONS; RECEIVE AND REVIEW FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S OFFICIAL STATEMENT RE: MEETING WITH QUALITY REPRESENTATIVES AND CITY OFFICIALS.	1.10	185.00	203.50
05/04/06	RDJ	PREPARE SUMMARY OF MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AND RULE 26 MEETING; REVIEW AND ANALYZE ASBESTOS TESTING RESULTS OF SAMPLES COLLECTED BY FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; REVIEW DOCUMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S ENFORCEMENT FILE; REVIEW AND ANALYZE ENVIRONMENTAL PROTECTION AGENCY DOCUMENTS RE: THE ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS; RESEARCH CONCERNING NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS TO THE REMOVAL OF ASBESTOS CEMENT PIPE USED FOR WATER OR SEWER MAINS; PHONE CONFERENCE WITH K. HENNESSY, W. MOSS AND R. JOEL RE: STATUS OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER.	7.30	175.00	1,277.50
05/04/06	KSH	OFFICE CONFERENCE WITH D. JACKSON AND M. MOONEY RE: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION MEETING AND RULE 26 MEETING; STRATEGIZE ON SANCTIONS; WORK SESSION WITH D. JACKSON RE: NESHAP RESEARCH; RECEIVE AND REVIEW EMAIL FROM D. JACKSON; PHONE CONFERENCE WITH W. MOSS; PHONE CONFERENCE WITH P. GENZLER RE: NESHAP; PHONE CONFERENCE WITH S. CULLIVER, DEPARTMENT OF ENVIRONMENTAL PROTECTION.	1.50	225.00	337.50
05/05/06	SB	REVIEW MATERIALS SUBMITTED BY THE DEPARTMENT OF ENVIRONMENTAL PROTECTION IN PREPARATION FOR INCLUSION TO SUMMATION; BEGIN IDENTIFYING SCHEDULE OF PHOTOGRAPHS.	2.50	100.00	250.00
05/05/06	RDJ	PHONE CONFERENCES WITH ENVIRONMENTAL PROTECTION AGENCY REGIONAL ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS COORDINATOR RE: APPLICABILITY	4.00	175.00	700.00

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		OF ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS TO REMOVAL OF "IN GROUND" PIPES; RESEARCH APPLICABILITY OF ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS AND WHAT CONSTITUTES A "FACILITY" UNDER THE ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS; PHONE CONFERENCE WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES RE: INFORMATION FROM THE ENVIRONMENTAL PROTECTION AGENCY, APPLICABILITY OF THE ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER.			
05/05/06	KSH	RECEIVE AND REVIEW EMAILS FROM S. GOLD.	0.30	225.00	67.50
05/08/06	MDM	RECEIVE AND REVIEW EMAIL CORRESPONDENCE FROM S. GOLD, D. JACKSON AND K. HENNESSY RE: RICO CASE LAW ON INAPPLICABILITY TO MUNICIPALITIES AND RESEARCH OF OPINION CITED BY S. GOLD.	0.40	185.00	74.00
05/08/06	RDJ	LEGAL RESEARCH RE: RICO CLAIMS ALLEGED AGAINST A MUNICIPALITY INCLUDING CASE LAW CITED BY C.A.R.E.S. IN ITS MEMORANDUM IN OPPOSITION TO MOTION TO DISMISS AND DRAFT MEMORANDUM RE: THIS RESEARCH FOR K. HENNESSY.	2.70	175.00	472.50
05/08/06	KSH	PHONE CONFERENCE WITH D. JACKSON RE: MOTION TO DISMISS.	0.30	225.00	67.50
05/09/06	RDJ	RESEARCH CONCERNING ASBESTOS NESHAP AND IT'S APPLICABILITY TO PENDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER.	1.80	175.00	315.00
05/10/06	MDM	RECEIVE AND REVIEW DRAFT CASE MANAGEMENT REPORT.	0.20	185.00	37.00
05/10/06	RDJ	RECEIVE AND REVIEW DRAFT CASE MANAGEMENT REPORT; EMAIL CORRESPONDENCE WITH COUNSEL FOR QUALITY ENTERPRISES AND C.A.R.E.S. RE: CHANGES TO CASE MANAGEMENT REPORT; FILE ORGANIZATION.	1.50	175.00	262.50
05/10/06	KSH	RECEIVE AND REVIEW EMAILS FROM W. MOSS.	0.20	225.00	45.00
05/15/06	MDM	RECEIVE AND REVIEW COURT'S CASE MANAGEMENT ORDER.	0.20	185.00	37.00
05/15/06	SB	BEGIN ENTRY OF DEPARTMENT OF ENVIRONMENTAL PROTECTION DOCUMENTS INTO SUMMATION FOR	3.00	100.00	300.00

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		TRIAL PREPARATION.			
05/15/06	RDJ	RECEIVE AND REVIEW CASE MANAGEMENT AND SCHEDULING ORDER.	0.20	175.00	35.00
05/16/06	MDM	RECEIVE AND REVIEW C.A.R.E.S.' PRESS RELEASE ON BOND VALIDATION HEARING.	0.20	185.00	37.00
05/16/06	SB	RESEARCH RULE 26; PREPARE MEMO WITH ITEMS THAT HAVE TO BE DISCLOSED PURSUANT TO RULE 26; BEGIN RESEARCH AND REVIEW OF FILES TO CREATE DISCLOSURE OF ALL PARTIES' ADDRESSES, ETC.	2.70	100.00	270.00
05/16/06	KSH	RECEIVE AND REVIEW EMAIL FROM W. MOSS RE: VALIDATION OF BONDS.	0.20	225.00	45.00
05/17/06	SB	REVIEW COURT ORDER OF MAY 15 RE: SELECTION OF MEDIATOR AND RESEARCH AND REVIEW DEADLINES.	0.70	100.00	70.00
05/17/06	KSH	RECEIVE AND REVIEW EMAIL FROM W. MOSS.	0.20	225.00	45.00
05/18/06	MDM	SEVERAL EMAIL CORRESPONDENCES WITH K. HENNESSY, D. JACKSON AND H. RICE RE: MEDIATION SELECTION PER CASE MANAGEMENT ORDER.	0.30	185.00	55.50
05/18/06	RDJ	RESEARCH CONCERNING POTENTIAL MEDIATORS; PREPARE AND ORGANIZE MATERIALS FOR DISCOVERY; DRAFT REQUEST FOR ADMISSIONS AND INTERROGATORIES; RESEARCH CONCERNING EPA ENFORCEMENT UNDER THE ASBESTOS NESHAP.	3.30	175.00	577.50
05/19/06	RDJ	STRATEGY SESSION WITH H. RICE AND M. MOONEY RE: POSSIBLE MEDIATORS; RESEARCH CONCERNING POSSIBLE MEDIATORS; DRAFT, EDIT, FINALIZE LETTER TO COUNSEL FOR QUALITY ENTERPRISES AND C.A.R.E.S. RE: SELECTION OF MEDIATOR AND POSSIBLE SETTLEMENT OFFER.	2.60	175.00	455.00
05/19/06	HHR	PHONE CONFERENCE WITH FT. MYERS CITY ATTORNEY, G. ALLEY, RE: INFORMATION ON POTENTIAL FEDERAL MEDIATORS; PHONE CONFERENCE WITH M. MOONEY RE: SAME.	0.60	280.00	168.00
05/19/06	MDM	STRATEGY SESSION WITH D. JACKSON AND H. RICE RE: MEDIATION SELECTION, CONTACT WITH OPPOSING COUNSEL; EMAIL CORRESPONDENCE WITH K. HENNESSY AND D. JACKSON RE: PREPARATION OF CORRESPONDENCE TO C.A.R.E.S. RE: CONFIRMING C.A.R.E.S.' SETTLEMENT OFFER AND PREPARATION OF MEETING SUMMARY WITH C.A.R.E.S. AND QUALITY; REVIEW CORRESPONDENCE TO S. GOLD AND S. BUNNER RE: MEDIATION SELECTION AND SETTLEMENT OFFER.	0.80	185.00	148.00
05/19/06	KSH	INVESTIGATE MEDIATORS; RECEIVE AND REVIEW	0.40	225.00	90.00

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		EMAIL FROM W. MOSS; RESPOND TO SAME; RECEIVE AND REVIEW LETTER.			
05/22/06	KSH	RECEIVE AND REVIEW LETTER FROM D. JACKSON TO S. GOLD RE: MEDIATION.	0.20	225.00	45.00
05/23/06	RDJ	RECEIVE AND REVIEW LETTER FROM ATTORNEY FOR QUALITY ENTERPRISES RE: SELECTION OF MEDIATOR; RESEARCH CONCERNING POTENTIAL MEDIATOR.	0.80	175.00	140.00
05/23/06	KSH	RECEIVE AND REVIEW EMAIL FROM W. MOSS RE: CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.	0.20	225.00	45.00
05/24/06	RDJ	RECEIVE AND REVIEW QUALITY ENTERPRISES' DRAFT RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S PROPOSED PENALTY WORKSHEET AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION LETTER TO QUALITY ENTERPRISES RE: PROPOSED DEBRIS PILE SAMPLING AND REMOVAL PLAN; EMAIL CORRESPONDENCE WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, AND R. JOEL RE: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S POSITION ON DEBRIS PILE; EMAIL CORRESPONDENCE WITH ATTORNEYS FOR C.A.R.E.S. AND QUALITY ENTERPRISES RE: SELECTION OF MEDIATOR; PHONE CONFERENCE WITH CITY OF MARCO ISLAND STAFF RE: DOCUMENT REVIEW MEETING.	3.10	175.00	542.50
05/24/06	KSH	RECEIVE AND REVIEW EMAILS RE: SELECTION OF MEDIATOR; RECEIVE AND REVIEW EMAILS ON CITIZENS ADVOCATING RESPONSIBLE ENVIRONMENTAL SOLUTIONS, INC.	0.40	225.00	90.00
05/25/06	MDM	SEVERAL EMAIL CORRESPONDENCE WITH S. BATTLE AND D. JACKSON RE: RULE 26 DISCLOSURES AND STATUS; REVIEW CORRESPONDENCE FROM R. BLACKBURN RE: FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION COMMENTS; REVIEW OF QUALITY'S PLAN.	0.50	185.00	92.50
05/25/06	SB	WORK SESSION WITH D. JACKSON RE: MEDIATOR SELECTION; PREPARE JOINT STIPULATION FOR MEDIATOR SELECTION.	1.00	100.00	100.00
05/25/06	RDJ	PHONE CONFERENCE WITH D. PROLMAN'S OFFICE RE: HIS SELECTION AND AVAILABILITY AS MEDIATOR; WORK SESSION WITH S. BATTLE RE: PREPARATION OF JOINT STIPULATION FOR SELECTION OF MEDIATOR; REVIEW AND ANALYZE QUALITY ENTERPRISES' DRAFT RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S PROPOSED PENALTY WORKSHEET; PREPARE EDITS TO RESPONSE	3.90	175.00	682.50

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		TO PROPOSE TO QUALITY ENTERPRISES' ATTORNEY; RESEARCH CONCERNING FLORIDA STATUTES RE: LICENSED ASBESTOS ABATEMENT CONTRACTORS.			
05/25/06	KSH	RECEIVE AND REVIEW EMAILS FROM D. JACKSON WITH DRAFT RESPONSES TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AND SCHEDULING CONFERENCE CALL.	1.00	225.00	225.00
05/26/06	RDJ	STRATEGY SESSION WITH K. HENNESSY RE: ISSUES WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER; PHONE CONFERENCE WITH K. HENNESSY AND P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: STATUS OF DEBRIS PILE MANAGEMENT PLAN AND RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION RE: ENFORCEMENT MATTER; FOLLOW UP WITH P. GENZLER RE: K. HENNESSY'S PHONE CONFERENCE WITH J. IGLEHART FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION.	2.30	175.00	402.50
05/26/06	KSH	OFFICE CONFERENCE WITH D. JACKSON; PREPARE FOR AND ATTEND CONFERENCE CALL WITH P. GENZLER; PHONE CONFERENCE WITH J. IGLEHART; RECEIVE AND REVIEW EMAIL FROM P. GENZLER.	1.20	225.00	270.00
05/27/06	KSH	RECEIVE AND REVIEW LETTER FROM D. JACKSON TO D. PROLMAN.	0.30	225.00	67.50
05/30/06	MDM	RECEIVE AND REVIEW CORRESPONDENCE FROM P. GENZLER RE: REVISION TO QUALITY'S PROPOSED RESPONSE TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; RECEIVE AND REVIEW CORRESPONDENCE FROM S. GOLD TO REPORTER RE: COURT RULING ON REMOVAL OF CASE TO TALLAHASSEE.	0.20	185.00	37.00
05/30/06	RDJ	RECEIVE AND REVIEW LETTER FROM P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: CITY OF MARCO ISLAND'S RESPONSIBILITY FOR ALLEGED VIOLATIONS OF ASBESTOS NESHAP UNDER FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER; DRAFT LETTER TO W. MOSS AND R. JOEL RE: GENZLER LETTER; PREPARE FOR MEETING WITH CITY OF MARCO ISLAND STAFF.	1.40	175.00	245.00
05/30/06	KSH	RECEIVE AND REVIEW LETTER FROM P. GENZLER; WORK SESSION WITH D. JACKSON RE: SAME.	0.50	225.00	112.50
05/31/06	RDJ	TRAVEL TO AND FROM MARCO ISLAND CITY HALL TO REVIEW DOCUMENTS; REVIEW DOCUMENTS; ATTEND MEETING WITH R. JOEL, T. PINTER, M. DANIEL AND W. MOSS.	8.00	175.00	1,400.00

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06/01/06	RDJ	EMAIL CORRESPONDENCE WITH ATTORNEYS FOR CARES AND QUALITY ENTERPRISES RE: SCHEDULING OF MEDIATION; ORGANIZE DOCUMENTS RECEIVED FROM CITY OF MARCO ISLAND STAFF.	1.30	175.00	227.50
06/02/06	KSH	SCHEDULE MEETING.	0.20	225.00	45.00
06/05/06	KSH	WORK SESSION WITH D. JACKSON AND R. PERRY RE: TASKS.	0.50	225.00	112.50
06/05/06	RDJ	WORK SESSION WITH R. PERRY RE: MOTION FOR SANCTIONS.	0.30	175.00	52.50
06/05/06	RHP	PREPARE INITIAL DRAFT OF PLEADINGS.	2.40	185.00	444.00
06/05/06	RHP	REVIEW FILES AND PAST CORRESPONDENCE; CONTINUE DRAFTING PLEADINGS.	1.40	185.00	259.00
06/06/06	SB	REVIEW PLEADINGS AND FILE MATERIALS RE: LETTER OF TRANSMITTAL FROM PLAINTIFFS.	0.60	100.00	60.00
06/06/06	RHP	LEGAL RESEARCH RE: NOTICES AND SANCTIONS.	1.20	185.00	222.00
06/08/06	KSH	RECEIVE AND REVIEW MOTION FOR SANCTIONS.	0.20	225.00	45.00
06/08/06	RHP	LEGAL RESEARCH RE: NOTICE.	0.50	185.00	92.50
06/08/06	RDJ	WORK SESSION WITH K. HENNESSY RE: STATUS OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER; WORK SESSION WITH R. PERRY RE: "NOTICING" ISSUES.	0.40	175.00	70.00
06/09/06	RHP	REVIEW FILE AND EMAIL CORRESPONDENCE; REVIEW AND REVISE MOTION FOR SANCTIONS AND MOTION TO STRIKE; LEGAL RESEARCH RE: VALIDITY OF CLAIMS RAISED BY PLAINTIFF AND CASES TO SUPPORT MOTION TO STRIKE AND FOR SANCTIONS.	3.50	185.00	647.50
06/09/06	RHP	WORK SESSION WITH K. HENNESSY AND D. JACKSON RE: MOTIONS AND PLEADINGS.	0.30	185.00	55.50
06/09/06	RDJ	PHONE CONFERENCE WITH R. JOEL, J. IGLEHART (FDEP) RE: STATUS OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER AND SCHEDULING OF A MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF.	0.40	175.00	70.00
06/09/06	SB	COPY AND ORGANIZE CONSTRUCTION MINUTES FROM MARCH 15, 2005 THROUGH MAY 23, 2006 FOR PURPOSES OF IDENTIFYING KEY ISSUES RE: DUST, ASBESTOS, CONCRETE CRUSHING.	2.10	100.00	210.00
06/12/06	RHP	REVIEW AND REVISE MOTION TO STRIKE.	1.00	185.00	185.00
06/12/06	SB	REVIEW CONSTRUCTION MINUTES; PREPARE SUMMARY OF IDENTIFIED ISSUES.	1.70	100.00	170.00
06/12/06	KSH	WORK SESSION WITH D. JACKSON RE: MEETING WITH DEPARTMENT OF ENVIRONMENTAL PROTECTION.	0.30	225.00	67.50

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06/13/06	RDJ	PHONE CONFERENCE WITH AND EMAIL CORRESPONDENCE WITH P. GENZLER, ATTORNEY FOR QUALITY, RE: STATUS OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER AND MEETINGS WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF.	0.50	175.00	87.50
06/14/06	SB	STRATEGY SESSION WITH D. JACKSON RE: RESPONSES TO RULE 26; DRAFT DISCLOSURE.	1.20	100.00	120.00
06/15/06	RDJ	WORK SESSION WITH S. BATTLE RE: MANDATORY INITIAL DISCLOSURES; ORGANIZE AND PREPARE INFORMATION RE: MANDATORY DISCLOSURES.	1.70	175.00	297.50
06/16/06	SB	REVISE DRAFT OF INITIAL DISCLOSURES PURSUANT TO RULE 26(A)(1); WORK SESSION WITH D. JACKSON RE: SAME.	0.70	100.00	70.00
06/16/06	RDJ	PHONE CONFERENCE WITH S. BONNER, ATTORNEY FOR QUALITY, RE: STATUS OF VARIOUS ISSUES; PREPARE INFORMATION FOR MANDATORY INITIAL DISCLOSURES.	2.00	175.00	350.00
06/19/06	MDM	RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCES RE: PRESS RELEASE ON ASBESTOS CONTENT BY CARES; REVIEW AND EDIT RULE 26 DISCLOSURE; WORK SESSION WITH S. BATTLE AND D. JACKSON RE: SAME.	0.70	185.00	129.50
06/19/06	RDJ	PREPARE INFORMATION FOR MANDATORY DISCLOSURES UNDER RULE 26; REVIEW AND REVISE DRAFT OF MANDATORY INITIAL DISCLOSURES; DRAFT REQUEST FOR ADMISSIONS.	2.90	175.00	507.50
06/19/06	KSH	RECEIVE AND REVIEW EMAILS FROM W. MOSS; RESPOND TO SAME.	0.30	225.00	67.50
06/19/06	SB	PHONE CALLS TO L. LITZAN; STRATEGY SESSIONS WITH D. JACKSON; REVISE INITIAL DISCLOSURES; PREPARE FAX CORRESPONDENCE MEMOS TO OPPOSING COUNSEL AND CO-DEFENSE COUNSEL; FORWARD SAME.	3.20	100.00	320.00
06/20/06	RHP	REVIEW RULE 11; REVIEW CASE LAW RE: SANCTION AND TIMEFRAMES; PREPARE REVISIONS AND FINALIZE MOTION FOR K. HENNESSY REVIEW.	1.50	185.00	277.50
06/22/06	KSH	RECEIVE AND REVIEW QUALITY ENTERPRISE'S INITIAL DISCOVERY; OFFICE CONFERENCE WITH D. JACKSON.	0.50	225.00	112.50
06/23/06	RDJ	RESEARCH CONCERNING FAILURE TO MAKE MANDATORY INITIAL DISCLOSURES UNDER RULE 26 AND POSSIBLE COURSES OF ACTION.	1.50	175.00	262.50
06/26/06	RDJ	PHONE CONFERENCE WITH FLORIDA DEPARTMENT	0.80	175.00	140.00

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		OF ENVIRONMENTAL PROTECTION TO FINALIZE ARRANGEMENT FOR CONFERENCE CALL; DRAFT LETTER TO J. IGLEHART TO CONFIRM CONFERENCE CALL TO DISCUSS ISSUES INVOLVING DEBRIS PILE ON MARCO ISLAND.			
06/26/06	KSH	PHONE CONFERENCE WITH R. JOEL RE: MEDIATION; WORK SESSION WITH D. JACKSON.	0.30	225.00	67.50
06/27/06	KSH	RECEIVE AND REVIEW EMAIL FROM P. GEIZLER AND RESPOND TO SAME.	0.30	225.00	67.50
06/28/06	RDJ	RESEARCH CONCERNING "FACILITY" AND "FACILITY COMPONENT"; PREPARE FOR MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; PHONE CONFERENCE WITH P. GENZLER AND L. GAUDIO FROM QUALITY ENTERPRISES RE: AGENDA FOR MEETING WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION.	2.20	175.00	385.00
06/28/06	KSH	WORK SESSION WITH D. JACKSON.	0.30	225.00	67.50
06/28/06	RHP	WORK SESSION WITH K. HENNESSY RE: MOTION FOR SANCTIONS.	0.20	185.00	37.00
06/29/06	RDJ	STRATEGY SESSION WITH K. HENNESSY RE: CONFERENCE CALL WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; PREPARE AND ORGANIZE DOCUMENTS FOR CONFERENCE CALL; PHONE CONFERENCE WITH P. GENZLER RE: STATUS OF CARES LAWSUIT AND FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT ACTION; CONFERENCE CALL WITH K. HENNESSY, R. JOEL, P. GENZLER, L. GAUDIO (QUALITY ENTERPRISES), J. IGLEHART FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION AND VARIOUS FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF TO DISCUSS APPLICABILITY OF ASBESTOS NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS TO REMOVAL OF DEBRIS PILE AND OTHER RELATED ISSUES; CONFERENCE CALL WITH K. HENNESSY AND P. GENZLER TO FOLLOW UP ON ISSUES DISCUSSED WITH FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF AND STRATEGIES GOING FORWARD.	3.20	175.00	560.00
06/29/06	KSH	OFFICE CONFERENCE WITH D. JACKSON IN PREPARATION FOR CONFERENCE CALL WITH DEPARTMENT OF ENVIRONMENTAL PROTECTION; PHONE CONFERENCE WITH R. JOEL BEFORE MEETING; PREPARE FOR AND ATTEND CONFERENCE WITH DEPARTMENT OF ENVIRONMENTAL PROTECTION;	2.50	225.00	562.50

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		PHONE CONFERENCE WITH RE: OMBUDSMAN'S PROPOSAL; PHONE CONFERENCE WITH P. LENZEN; PHONE CONFERENCE WITH CONSULTANT.			
07/03/06	RDJ	PHONE CONFERENCE WITH S. GOLD, ATTORNEY FOR CARES, RE: SERVICE OF CARES INITIAL DISCLOSURES AND MOTION FOR SANCTIONS; DRAFT REQUEST FOR ADMISSIONS, INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS.	1.60	175.00	280.00
07/03/06	RHP	ELECTRONICALLY FILE MOTION FOR SANCTIONS.	0.20	185.00	37.00
07/03/06	KSH	FINALIZE MOTION FOR SANCTIONS; OFFICE CONFERENCE WITH D. JACKSON RE: CALL FROM S. GOLD.	0.90	225.00	202.50
07/05/06	KSH	WORK SESSION WITH D. JACKSON RE: STATUS; PREPARE OUTLINE OF POINTS FOR THE FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION.	1.10	225.00	247.50
07/05/06	RDJ	DRAFT LETTER TO S. GOLD RE: DEADLINE FOR PROVIDING INITIAL DISCLOSURES; PHONE CONFERENCE WITH S. BUNNER, ATTORNEY FOR QUALITY ENTERPRISES, RE: STATUS OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ENFORCEMENT MATTER, REMOVAL OF DEBRIS PILE, DISCOVERY ISSUES; WORK SESSION WITH K. HENNESSY RE: VARIOUS FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION ISSUES AND REVISE DOCUMENT TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION RE: SAME.	1.90	175.00	332.50
07/06/06	RDJ	DRAFT LETTER TO J. IGLEHART (FDEP) RE: ISSUES INVOLVING APPLICABILITY OF NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS TO REMOVAL OF DEBRIS PILE AND DURING ROAD CONSTRUCTION AND REVISE DOCUMENT RE: THESE ISSUES: RECEIVE AND REVIEW INITIAL DOCUMENTS FROM CARES; DRAFT REQUEST FOR ADMISSIONS.	3.90	175.00	682.50
07/07/06	RDJ	PHONE CONFERENCES WITH R. JOEL RE: SUBMITTAL OF POINT PAPER TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; EMAIL CORRESPONDENCE WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: SUBMITTAL TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; REVISE POINT PAPER; LETTER TO J. IGLEHART; DRAFT INTERROGATORIES.	2.80	175.00	490.00
07/07/06	KSH	RECEIVE AND REVIEW EMAIL COMMENTS ON POINT PAPER FROM P. GENZLER; RECEIVE R. JOEL'S CONCERNS; RESPOND TO SAME; REVIEW AND REVISE POINT PAPER.	1.00	225.00	225.00

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07/10/06	KSH	RECEIVE AND REVIEW WORK PLAN; FINALIZE LETTER TO J. IGLEHART.	0.50	225.00	112.50
07/10/06	RDJ	RECEIVE AND REVIEW DRAFT WORK PLAN FOR REMOVAL OF DEBRIS PILE; PHONE CONFERENCE WITH R. JOEL RE: WORK PLAN AND SUBMITTAL OF POINT PAPER TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION; RECEIVE AND REVIEW COMMENTS ON POINT PAPER FROM CLIENT; REVISE AND FINALIZE POINT PAPER AND LETTER TO J. IGLEHART; DRAFT INTERROGATORIES.	3.30	175.00	577.50
07/11/06	RDJ	RECEIVE AND REVIEW DOCUMENTS FROM J. SNIDER, ASBESTOS CONSULTANT, RE: ASSESSMENT AND SAMPLING OF DUST, DEBRIS PILE AND AIR MONITORING; PHONE CONFERENCE WITH R. JOEL RE: REVISIONS TO WORK PLAN FOR REMOVAL OF DEBRIS PILE; DRAFT INTERROGATORIES AND REQUEST FOR ADMISSIONS.	2.90	175.00	507.50
07/11/06	KSH	WORK SESSION WITH D. JACKSON; RECEIVE AND REVIEW EMAILS.	0.30	225.00	67.50
07/12/06	RDJ	PHONE CONFERENCES WITH R. JOEL AND J. SNIDER, ASBESTOS CONSULTANT, RE: REVISIONS TO WORK PLAN FOR REMOVAL OF DEBRIS PILE; RECEIVE AND REVIEW QUALITY ENTERPRISES COMMENTS ON WORK PLAN; RECEIVE AND REVIEW FINALIZED WORK PLAN SUBMITTED TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION BY J. SNIDER; DRAFT REQUESTS FOR ADMISSIONS.	3.10	175.00	542.50
07/14/06	RDJ	PHONE CONFERENCE WITH ATTORNEY FOR CARES RE: RESPONSE TO MOTION FOR SANCTIONS; RECEIVE AND REVIEW ORDER RE: MOTION TO DISMISS AMENDED COMPLAINT AND PHONE CONFERENCE WITH B. MOSS RE: SAME; DRAFT REQUEST FOR ADMISSIONS AND INTERROGATORIES.	3.40	175.00	595.00
07/14/06	MDM	RECEIVE AND REVIEW COURT ORDER ON MOTION TO DISMISS; STRATEGY SESSION WITH D. JACKSON RE: RULING BY JUDGE STEELE, REQUEST FOR EXTENSION OF TIME BY PLAINTIFFS; RECEIVE AND REVIEW MOTION FOR EXTENSION OF TIME.	0.50	185.00	92.50
07/14/06	KSH	RECEIVE AND REVIEW CARES HEARING SUMMARY FROM B. MOSS; RESPOND TO SAME; RECEIVE AND REVIEW EMAIL FROM B. MOSS RE: MOTION TO DISMISS ORDER.	0.50	225.00	112.50
07/16/06	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS WITH SUMMARY BY R. YOVANOVICH; RECEIVE AND REVIEW ORDER ON MOTION TO DISMISS.	0.30	225.00	67.50

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Date	Atty	Description	Hours	Rate	Amount
07/17/06	RDJ	RECEIVE AND REVIEW CARES' MOTION REGARDING RESPONSE TO MOTION FOR SANCTIONS; DRAFT AND REVISE INTERROGATORIES, REQUEST FOR ADMISSION.	3.80	175.00	665.00
07/17/06	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS.	0.20	225.00	45.00
07/18/06	RDJ	RECEIVE AND REVIEW ORDER GRANTING EXTENSION OF TIME FOR RESPONSE TO MOTION FOR SANCTIONS; DRAFT AND REVISE INTERROGATORIES AND REQUEST FOR ADMISSIONS.	2.10	175.00	367.50
07/19/06	RDJ	DRAFT AND REVISE INTERROGATORIES, REQUEST FOR ADMISSIONS.	1.90	175.00	332.50
07/20/06	RDJ	DRAFT AND REVISE INTERROGATORIES AND REQUEST FOR ADMISSIONS.	1.70	175.00	297.50
07/20/06	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS.	0.20	225.00	45.00
07/24/06	MDM	RECEIVE AND REVIEW CARES MEMORANDUM IN OPPOSITION TO SANCTIONS; MOTION FOR SANCTIONS; MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SANCTIONS; STRATEGY SESSION WITH D. JACKSON RE: SAME.	0.80	185.00	148.00
07/24/06	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS; RESPOND TO SAME.	0.20	225.00	45.00
07/25/06	MDM	RECEIVE AND REVIEW SEVERAL EMAILS FROM K. HENNESSY AND D. JACKSON RE: PLAINTIFF'S REQUEST FOR SANCTIONS AND BASIS FOR SAME.	0.40	185.00	74.00
07/25/06	RDJ	RECEIVE AND REVIEW CARES' MEMORANDUM OF LAW IN OPPOSITION TO MOTION FOR SANCTIONS; RECEIVE AND REVIEW CARES' MOTION FOR SANCTIONS AND MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SANCTIONS; RESEARCH CONCERNING MOTIONS FOR SANCTIONS UNDER 28 U.S.C., SECTION 1927; DRAFT AND REVISE INTERROGATORIES AND REQUEST FOR ADMISSION.	3.30	175.00	577.50
07/25/06	KSH	WORK SESSION WITH D. JACKSON RE: DISCOVERY AND RESPONSE TO MOTION FOR SANCTIONS; RECEIVE AND REVIEW MOTION, MEMORANDUM OF LAW AND RESPONSE.	2.50	225.00	562.50
07/26/06	RDJ	RECEIVE AND REVIEW ENVIRONMENTAL PROTECTION AGENCY OPINION LETTER REGARDING APPLICABILITY OF NESMAP TO DO CONSTRUCTION ACTIVITIES ON MARCO ISLAND; RESEARCH CONCERNING SANCTIONS UNDER 28 U.S.C. SECTION 1927	2.60	175.00	455.00
07/27/06	MDM	RECEIVE AND REVIEW NEWSPAPER ARTICLE ON SANCTIONS MOTION.	0.30	185.00	55.50
07/27/06	RDJ	LEGAL RESEARCH RE: SANCTIONS UNDER 28 U.S.C.	3.50	175.00	612.50

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		SECTION 1927; DRAFT MEMORANDUM OF LAW IN OPPOSITION TO MOTION FOR SANCTIONS.			
07/27/06	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS; WORK SESSION WITH D. JACKSON.	0.30	225.00	67.50
08/01/06	RDJ	DRAFT AND REVISE REQUEST FOR ADMISSIONS AND INTERROGATORIES.	1.30	175.00	227.50
08/02/06	RDJ	DRAFT MEMORANDUM IN OPPOSITION TO MOTION FOR SANCTIONS.	2.20	175.00	385.00
08/03/06	RDJ	DRAFT AND REVISE MEMORANDUM IN OPPOSITION TO MOTION FOR SANCTIONS; LEGAL RESEARCH RE: SANCTIONS PURSUANT TO 28 U.S.C. SECTION 1927; DRAFT AND EDIT INTERROGATORIES AND REQUEST FOR ADMISSIONS.	3.50	175.00	612.50
08/04/06	RDJ	LEGAL RESEARCH RE: MOTIONS FOR SANCTIONS; REVISE MEMORANDUM IN OPPOSITION TO MOTION FOR SANCTIONS; REVIEW CORRESPONDENCE RE: SANCTIONS AND CARES' MEDIA RELEASES; DRAFT AND EDIT INTERROGATORIES AND REQUEST FOR ADMISSIONS.	3.50	175.00	612.50
08/07/06	KSH	RECEIVE AND REVIEW MEMORANDUM OF LAW; WORK SESSION WITH D. JACKSON.	0.50	225.00	112.50
08/07/06	KSH	RECEIVE AND REVIEW LETTER FROM I. NICHOLSON RE: ASBESTOS WORK PLAN; WORK SESSION WITH D. JACKSON.	0.30	225.00	67.50
08/07/06	RDJ	REVISE AND FINALIZE MEMORANDUM IN OPPOSITION TO MOTION FOR SANCTIONS; DRAFT AND EDIT INTERROGATORIES, REQUEST FOR ADMISSIONS AND REQUEST FOR PRODUCTION OF DOCUMENTS.	5.20	175.00	910.00
08/08/06	MDM	STRATEGY SESSION WITH D. JACKSON RE: CITY'S RESPONSE AND MEMORANDUM OF LAW IN OPPOSITION TO MOTION FOR SANCTIONS AND CARES' PREPARATION OF OBJECTION TO SAME.	0.40	185.00	74.00
08/08/06	RDJ	RECEIVE AND REVIEW OBJECTION TO MEMORANDUM IN OPPOSITION TO MOTION FOR SANCTIONS; LEGAL RESEARCH RE: EXTENSIONS OF TIME; DRAFT, EDIT, FINALIZE MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO MOTION FOR SANCTIONS; PHONE CONFERENCES WITH ATTORNEY FOR CARES RE: FILING OF MOTION FOR ENLARGEMENT OF TIME; DRAFT AND EDIT INTERROGATORIES AND REQUEST FOR ADMISSIONS.	7.10	175.00	1,242.50
08/09/06	MDM	RECEIVE AND REVIEW AUDIO AND VIDEO EXCERPTS OF R. JOEL STATEMENTS AT 3/6/06 PUBLIC MEETING; RECEIVE AND REVIEW ORDER GRANTING MOTION FOR ENLARGEMENT OF TIME.	0.60	185.00	111.00

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08/09/06	RDJ	REVISE INTERROGATORIES; DRAFT AND EDIT REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUEST FOR ADMISSIONS; RECEIVE AND REVIEW ORDER GRANTING MOTION FOR ENLARGEMENT OF TIME.	4.50	175.00	787.50
08/09/06	MAM	EXAMINE FILE; PHONE CONFERENCE WITH CLERK'S OFFICE RE: RECENT FILINGS TO CONFIRM STATUS OF CASE.	0.50	100.00	50.00
08/09/06	KSH	RECEIVE AND REVIEW DRAFT INTERROGATORIES; RECEIVE AND REVIEW EMAILS FROM K. DEES; WORK SESSION WITH D. JACKSON RE: MOTION FOR EXTENSION.	1.50	225.00	337.50
08/10/06	RDJ	REVISE INTERROGATORIES; DRAFT AND EDIT REQUEST FOR PRODUCTION OF DOCUMENTS AND REQUEST FOR ADMISSIONS.	2.30	175.00	402.50
08/11/06	RDJ	REVISE INTERROGATORIES; DRAFT AND EDIT REQUEST FOR ADMISSIONS, REQUEST FOR PRODUCTION OF DOCUMENTS; RECEIVE AND REVIEW ASBESTOS WORK PLAN SUBMITTED TO FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION.	4.80	175.00	840.00
08/14/06	KSH	RECEIVE AND REVIEW EMAIL FROM D. JACKSON AND MARCO ISLAND OFFICIALS; RESPOND TO SAME.	0.30	225.00	67.50
08/15/06	RDJ	EDIT AND REVISE INTERROGATORIES, REQUEST FOR ADMISSIONS AND REQUESTS FOR PRODUCTION.	2.10	175.00	367.50
08/16/06	RDJ	RECEIVE AND REVIEW "DUST CONTROL AND WATER RETENTION WORK PLAN" FOR SITE "A" AND FOLLOW UP; REVISE INTERROGATORIES, REQUEST FOR ADMISSIONS AND REQUESTS FOR PRODUCTION.	2.40	175.00	420.00
08/17/06	KSH	RECEIVE AND REVIEW WORK PLAN AND EMAIL FROM D. JACKSON.	0.30	225.00	67.50
08/17/06	RDJ	RECEIVE AND REVIEW REVISED "DUST CONTROL AND WATER RETENTION WORK PLAN" FOR SITE "A"; REVISE INTERROGATORIES, REQUEST FOR ADMISSIONS AND REQUEST FOR PRODUCTION.	2.60	175.00	455.00
08/18/06	RDJ	REVISE AND FINALIZE INTERROGATORIES, REQUEST FOR ADMISSION AND REQUEST FOR PRODUCTION.	2.80	175.00	490.00
08/23/06	KSH	WORK SESSION WITH D. JACKSON RE: WORK PLAN ISSUES.	0.30	225.00	67.50
08/24/06	MDM	RECEIVE AND REVIEW MEDIATION CONFIRMATION; EMAIL CORRESPONDENCE FROM B. MOSS RE: RECENT PRESS ABOUT ASBESTOS REMOVAL.	0.20	185.00	37.00
08/24/06	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS; WORK SESSION WITH D. JACKSON.	0.20	225.00	45.00
08/25/06	MDM	SEVERAL EMAIL CORRESPONDENCES WITH K.	0.20	185.00	37.00

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Date	Atty	Description	Hours	Rate	Amount
		HENNESSY AND CITY OF MARCO ISLAND RE: SETTLEMENT DISCUSSIONS WITH S. GOLD (CARES).			
08/25/06	KSH	EMAIL B. MOSS RE: CONVERSATION WITH S. GOLD RE: SETTLEMENT; SCHEDULE CONFERENCE CALL.	0.50	225.00	112.50
08/28/06	RDJ	CONFERENCE CALL WITH K. HENNESSY, B. MOSS, AND OTHER ATTORNEYS FOR THE CITY OF MARCO ISLAND RE: POSSIBLE SETTLEMENT OF LAWSUITS WITH CARES; DRAFT FOLLOW UP LETTER TO B. MOSS.	0.90	175.00	157.50
08/28/06	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH B. MOSS, R. YOVANOVICH AND OUTSIDE COUNSEL FOR BOND VALIDATION CASE; WORK SESSION WITH D. JACKSON.	1.00	225.00	225.00
08/30/06	RDJ	REVIEW REQUIREMENTS FOR EXPORT TESTIMONY DISCLOSURES; REVIEW AND ANALYZE REPORTS PREPARED BY J. SNIDER (AMRC) RE: "WEEKLY AIR MONITORING" AND "INITIAL ASSESSMENT AND SAMPLING FOR ASBESTOS" FOR PURPOSES OF EXPERT TESTIMONY.	1.70	175.00	297.50
08/31/06	MDM	RECEIVE AND REVIEW EMAIL CORRESPONDENCE FROM K. HENNESSY AND D. JACKSON RE: EXPERT DISCLOSURE.	0.20	185.00	37.00
08/31/06	RDJ	PHONE CONFERENCE WITH J. SNIDER, ASBESTOS CONSULTANT, RE: EXPERT TESTIMONY; STRATEGY SESSION WITH K. HENNESSY RE: DISCLOSURE OF EXPERT TESTIMONY; PREPARE EXPERT TESTIMONY DISCLOSURE.	2.30	175.00	402.50
09/01/06	MDM	RECEIVE AND REVIEW S. GOLD'S REQUEST FOR SCHEDULING OF DEPOSITIONS; EMAIL CORRESPONDENCE TO K. HENNESSY AND D. JACKSON RE: SAME.	0.20	185.00	37.00
09/01/06	RDJ	PHONE CONFERENCE WITH J. SNIDER (AMERICAN MANAGEMENT RESOURCES CORPORATION) RE: EXPERT WITNESS SERVICES AND DISCLOSURE; REVIEW REPORTS PREPARED BY J. SNIDER RE: SAMPLING AND TESTING; PREPARE DISCLOSURE RE: EXPERT WITNESS TESTIMONY.	5.50	175.00	962.50
09/01/06	KSH	RECEIVE AND REVIEW EMAIL FROM S. GOLD.	0.20	225.00	45.00
09/05/06	RDJ	PHONE CONFERENCE WITH J. SNIDER (AMERICAN MANAGEMENT RESOURCES CORPORATION) RE: EXPERT WITNESS DISCLOSURE; REVISE, FINALIZE DISCLOSURE OF EXPERT WITNESS TESTIMONY AND ALL REQUIRED DOCUMENTS; CONFERENCE CALL WITH K. HENNESSY, L. DOUGLASS AND B. MOSS RE: ENVIRONMENTAL PROTECTION AGENCY INVOLVEMENT WITH PLAN TO REMOVE DEBRIS PILE;	4.30	175.00	752.50

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		RECEIVE AND REVIEW VARIOUS CORRESPONDENCE FROM L. DOUGLASS RE: ENVIRONMENTAL PROTECTION AGENCY INQUIRIES AND OTHER RELATED ISSUES.			
09/05/06	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH CITY AND B. MOSS; RECEIVE AND REVIEW NUMEROUS EMAILS FROM L. DOUGLASS AND PHOTOS OF SITE; RECEIVE AND REVIEW RESCHEDULING OF ENVIRONMENTAL PROTECTION AGENCY CONFERENCE CALL; RECEIVE AND REVIEW EMAILS OF NEWS ARTICLES.	1.90	225.00	427.50
09/06/06	RDJ	CONFERENCE CALL WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, AND L. GAUDIO, QUALITY ENTERPRISES, RE: ENVIRONMENTAL PROTECTION AGENCY INVOLVEMENT WITH PLAN TO REMOVE DEBRIS PILE; EMAIL CORRESPONDENCE WITH L. DOUGLASS RE: PLEADINGS IN FEDERAL LAW SUIT.	0.70	175.00	122.50
09/06/06	KSH	RECEIVE AND REVIEW EMAILS FROM L. DOUGLASS (SEVERAL); RESPOND TO SAME.	0.40	225.00	90.00
09/07/06	RDJ	PHONE CONFERENCE WITH S. GOLD, ATTORNEY FOR CARES, RE: SCHEDULING OF DEPOSITIONS AND FOLLOW UP.	0.40	175.00	70.00
09/08/06	RDJ	PHONE CONFERENCE WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: QUESTIONS INVOLVING REMOVED PIPE; PHONE CONFERENCE WITH CARES ATTORNEYS' OFFICE RE: SCHEDULING OF DEPOSITIONS.	0.80	175.00	140.00
09/11/06	RDJ	PHONE CONFERENCES WITH L. GAUDIO RE: VARIOUS QUESTIONS RE: REMOVAL OF PIPE AND DEBRIS PILE; PREPARE FOR CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY; CONFERENCE CALL WITH K. HENNESSY, REPRESENTATIVES FROM THE CITY OF MARCO ISLAND, J. SNIDER, L. GAUDIO AND EPA STAFF AND GENERAL COUNSEL TO DISCUSS VARIOUS ISSUES RE: REMOVAL OF PIPE AND WORK PLAN TO REMOVE DEBRIS PILE; PHONE CONFERENCE WITH L. DOUGLASS RE: CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY, DOCUMENTS TO BE SENT TO ENVIRONMENTAL PROTECTION AGENCY, AND SCHEDULING OF DEPOSITIONS.	3.80	175.00	665.00
09/11/06	KSH	RECEIVE AND REVIEW EMAIL FROM L. GAUDIO RE: EPA; RECEIVE AND REVIEW EMAIL FROM L. DOUGLASS; RECEIVE AND REVIEW EMAIL FROM D.	1.20	225.00	270.00

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		JACKSON RE: SAME; RECEIVE AND REVIEW EMAIL FROM D. JACKSON RE: CITY ATTORNEYS; RECEIVE AND REVIEW EMAIL FROM D. JACKSON TO L. DOUGLASS.			
09/11/06	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH EPA.	1.90	225.00	427.50
09/12/06	RDJ	DRAFT LETTER TO CARES' ATTORNEY RE: DEPOSITION SCHEDULING AND REQUESTS.	0.40	175.00	70.00
09/13/06	RDJ	REVIEW AND REVISE PLAN SUMMARY AND ADDENDUM TO WORK PLAN TO REMOVE DEBRIS PILE PREPARED FOR SUBMITTAL TO ENVIRONMENTAL PROTECTION AGENCY; EMAIL CORRESPONDENCE WITH J. SNIDER, L. GUADIO, AND L. DOUGLASS RE: CHANGES TO DOCUMENTS; REVISE, FINALIZE LETTER TO CARES' ATTORNEY RE: DEPOSITION SCHEDULING AND REQUESTS.	2.80	175.00	490.00
09/13/06	KSH	FINALIZE LETTER TO S. GOLD; WORK SESSION WITH D. JACKSON.	0.30	225.00	67.50
09/14/06	RDJ	EMAIL CORRESPONDENCE WITH J. SNIDER, L. GAUDIO, L. DOUGLASS RE: FINAL SUBMITTAL OF WORK PLAN DOCUMENTS TO ENVIRONMENTAL PROTECTION AGENCY; ORGANIZE DOCUMENTS FOR DEPOSITION.	2.40	175.00	420.00
09/15/06	RDJ	ORGANIZE DOCUMENTS TO PREPARE FOR DEPOSITIONS; RECEIVE AND REVIEW NOTICES SETTING DEPOSITIONS FROM CARES.	1.80	175.00	315.00
09/15/06	KSH	RECEIVE AND REVIEW NOTICES OF DEPOSITION OF J. IGELHART; S. CULLIVER, M. DANIEL, B. UTSLER, R. JOEL AND B. MOSS.	0.30	225.00	67.50
09/18/06	RDJ	RECEIVE AND REVIEW DEPOSITIONS NOTICES FROM CARES; PHONE CONFERENCE WITH CITY OF MARCO ISLAND STAFF RE: PUBLIC RECORDS REQUEST FOR ASBESTOS TESTING RESULTS; RECEIVE AND REVIEW LETTER RE: REQUEST; DRAFT, EDIT, FINALIZE DEPOSITION NOTICE FOR E. FOSTER, CHAIRMAN OF CARES; PREPARE FOR DEPOSITIONS.	2.60	175.00	455.00
09/19/06	RDJ	PHONE CONFERENCE WITH S. BUNNER, ATTORNEY FOR QUALITY ENTERPRISES, RE: DISCOVERY RESPONSES AND DEPOSITIONS; PHONE CONFERENCES WITH COUNSEL FOR CARES RE: REQUEST FOR ADDITIONAL TIME TO RESPOND TO DISCOVERY REQUESTS; DRAFT LETTER TO CARES' ATTORNEY RE: SAME; RESEARCH CONCERNING PUBLIC RECORDS REQUEST RECEIVED BY CITY OF MARCO ISLAND RE: ASBESTOS TESTING; PREPARE FOR DEPOSITIONS.	3.20	175.00	560.00
09/19/06	KSH	RECEIVE AND REVIEW NOTICE OF TAKING	0.20	225.00	45.00

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		DEPOSITION DUCES TECUM OF E. FOSTER.			
09/20/06	RDJ	FINALIZE LETTER TO CARES' ATTORNEY RE: REQUEST FOR ADDITIONAL TIME TO RESPOND TO DISCOVERY; RESEARCH CONCERNING REQUESTS FOR ADMISSION.	0.80	175.00	140.00
09/20/06	KSH	RECEIVE AND REVIEW LETTER TO S. GOLD; WORK SESSION WITH D. JACKSON.	0.30	225.00	67.50
09/21/06	MDM	SEVERAL EMAIL CORRESPONDENCES AND STRATEGY SESSION WITH D. JACKSON AND K. HENNESSY RE: UPCOMING DEPOSITIONS AND SCHEDULING DEPOSITIONS PREPARATION OF R. JOEL AND B. MOSS.	0.50	185.00	92.50
09/21/06	RDJ	DRAFT MEDIATION STATEMENT; CONFERENCE CALL WITH K. HENNESSY, B. MOSS, AND L. DOUGLASS RE: PHONE CALL FROM ENVIRONMENTAL PROTECTION AGENCY ATTORNEY RE: STATUS OF WORK PLAN TO REMOVE DEBRIS PILE.	1.70	175.00	297.50
09/21/06	KSH	ATTEND CONFERENCE CALL WITH L. DOUGLASS AND B. MOSS.	0.50	225.00	112.50
09/22/06	RDJ	PHONE CONFERENCE WITH K. HENNESSY AND P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: STRATEGY FOR RESOLVING POTENTIAL ISSUES WITH ENVIRONMENTAL PROTECTION AGENCY; PHONE CONFERENCE WITH B. MOSS RE: STATUS WITH ENVIRONMENTAL PROTECTION AGENCY AND QUALITY'S POSITION; PHONE CONFERENCE WITH R. CAPLAN, EPA ATTORNEY, RE: REMOVAL OF DEBRIS PILE AND SCHEDULING OF CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY TO DISCUSS OPTIONS AND FOLLOW UP; DRAFT MEDIATION STATEMENT.	4.80	175.00	840.00
09/22/06	MDM	STRATEGY SESSION WITH K. HENNESSY AND D. JACKSON RE: UPCOMING DEPOSITION, COVERAGE QUESTIONS FOR CARES REPRESENTATIVE AND E. FOSTER; PREPARATION OF CITY OFFICIALS, STRATEGY.	1.00	185.00	185.00
09/22/06	KSH	PHONE CONFERENCE WITH P. GENZLER RE: CONVERSATION WITH ENVIRONMENTAL PROTECTION AGENCY; WORK SESSION WITH D. JACKSON.	0.50	225.00	112.50
09/25/06	MDM	REVIEW CARES WEBSITE FOR UPCOMING DEPOSITION OF E. FOSTER; BEGIN OUTLINE OF DEPOSITION QUESTIONS FOR E. FOSTER; STRATEGY SESSION WITH D. JACKSON RE: DISCOVERY RESPONSES FROM CARES, DEPOSITION RESCHEDULING AND UNAVAILABILITY OF DEPARTMENT OF ENVIRONMENTAL PROTECTION REPRESENTATIVES, CARES WEBSITE.	2.10	185.00	388.50

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09/25/06	RDJ	PREPARE FOR DEPOSITIONS; DRAFT MEDIATION STATEMENT.	2.60	175.00	455.00
09/26/06	MDM	RECEIVE AND REVIEW UNEXECUTED NOTICES OF CANCELLATION OF DEPOSITION; SEVERAL EMAIL CORRESPONDENCES AND PHONE CONFERENCE WITH S. GOLD'S OFFICE RE: DEPOSITION CANCELLATION AND SCHEDULING, DEMAND FOR E. FOSTER'S DEPOSITION, CARES' DISCOVERY RESPONSE, DEMAND FOR SAME; SEVERAL EMAIL CORRESPONDENCE AND PHONE CONFERENCE WITH D. JACKSON AND K. HENNESSY RE: STATUS AND COMMUNICATION FROM S. GOLD'S OFFICE; PHONE CONFERENCE WITH B. MOSS AND R. JOEL RE: S. GOLD'S ATTEMPT TO CANCEL DEPOSITIONS AND CONTINUATION OF AND PREPARE FOR SAME; CONTINUE TO PREPARE FOR DEPOSITION OF E. FOSTER AND REVIEW CARES WEBSITE INFORMATION; PHONE CONFERENCE WITH J. IGLEHART AND I. NICHOLSON (GENERAL COUNSEL) RE: STATUS OF DEPARTMENT OF ENVIRONMENTAL PROTECTION'S DEPOSITIONS; DRAFT CORRESPONDENCE TO S. GOLD RE: DELIVERY OF DISCOVERY RESPONSES FROM CARES; PREPARE AND FILE SECOND RE-NOTICE OF TAKING DEPOSITIONS DUCES TECUM.	3.90	185.00	721.50
09/26/06	RDJ	PREPARE FOR, ORGANIZE DOCUMENTS FOR DEPOSITIONS; CONFERENCE CALL WITH K. HENNESSY, P. GENZLER (ATTORNEY FOR QUALITY) AND ENVIRONMENTAL PROTECTION AGENCY STAFF REGARDING ISSUES WITH DEBRIS PILE.	3.40	175.00	595.00
09/26/06	KSH	WORK SESSION WITH M. MOONEY RE: DEPOSITION ISSUES; RECEIVE AND REVIEW EMAILS FROM M. MOONEY.	0.30	225.00	67.50
09/27/06	RDJ	PREPARE FOR, ORGANIZE DOCUMENTS FOR DEPOSITIONS; TRAVEL TO MARCO ISLAND; MEETING WITH M. MOONEY, B. MOSS, M. DANIEL AND R. JOEL TO PREPARE FOR DEPOSITIONS; STRATEGY SESSION WITH M. MOONEY REGARDING DEPOSITIONS; DRAFT MEDIATION STATEMENT.	8.80	175.00	1,540.00
09/27/06	MDM	REVIEW PRESS RELEASES, EMAILS AND DOCUMENTS IN FILE AUTHORED BY E. FOSTER RE: CARES PUBLIC RELATIONS AND PRESS IN PREPARATION FOR UPCOMING DEPOSITION OF E. FOSTER; SEVERAL EMAIL CORRESPONDENCE WITH S. GOLD RE: E. FOSTER DEPOSITION AND TIMING OF SAME; EMAIL CORRESPONDENCE WITH K. HENNESSY RE: SAME; FINALIZE OUTLINE FOR E. FOSTER DEPOSITION;	5.90	185.00	1,091.50

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		TRAVEL TO MARCO ISLAND FOR DEPOSITION PREPARATION WITH M. DANIELS, B. MOSS, R. JOEL; SEVERAL EMAIL CORRESPONDENCES WITH S. GOLD RE: CANCELLATION NOTICES, FEDERAL RULES GOVERNING DEPOSITION; TRAVEL FOR SAME; CONTINUE TO DRAFT DEPOSITION QUESTIONS FOR E. FOSTER; MEETING WITH M. DANIELS, R. JOEL AND B. MOSS RE: PRE-DEPOSITION PREPARATION.			
09/27/06	KSH	RECEIVE AND REVIEW EMAIL FROM P. GENZLER WITH LETTER TO ENVIRONMENTAL PROTECTION AGENCY; RESPOND TO SAME; RECEIVE AND REVIEW EMAILS FROM S. GOLD RE: DEPOSITIONS; RECEIVE AND REVIEW EMAILS RE: DEPOSITIONS AND TIME LIMITS; PHONE CONFERENCE WITH D. JACKSON; PHONE CONFERENCE WITH M. MOONEY.	1.00	225.00	225.00
09/28/06	RDJ	PREPARE FOR AND ATTEND DEPOSITIONS OF B. UTSLER (QUALITY ENTERPRISES) M. DANIEL, B. MOSS AND R. JOEL; DEPOSITION PREPARATION WITH B. MOSS AND R. JOEL AND M. MOONEY; STRATEGY SESSION WITH M. MOONEY REGARDING DEPOSITION OF E. FOSTER; PREPARE FOR DEPOSITION OF E. FOSTER.	11.50	175.00	2,012.50
09/28/06	MDM	ATTEND DEPOSITION OF B. UTSLER; MEET WITH R. JOEL, B. MOSS AND M. DANIELS RE: DEPOSITION PREPARATION; STRATEGY SESSION WITH D. JACKSON RE: PREPARATION OF OUTLINE FOR E. FOSTER DEPOSITION; CONTINUE TO PREPARE FOR DEPOSITION OF E. FOSTER; REVIEW DOCUMENTS FROM CARES WEBSITE, EMAILS, PROPAGANDA, COMMENTARY BY E. FOSTER ON RECALL, PETITION, SEWER OPPOSITION, COMMENTS ON W. MOSS AND R. JOEL; CONTINUE TO REVISE PREPARATION OUTLINE OF QUESTIONS FOR UPCOMING DEPOSITION OF B. MOSS.	14.30	185.00	2,645.50
09/28/06	KSH	RECEIVE AND REVIEW EMAIL FROM P. GENZLER WITH LETTER TO ENVIRONMENTAL PROTECTION AGENCY; RESPOND TO SAME WITH REVISIONS; RECEIVE AND REVIEW EMAIL FROM P. GENZLER TO S. BRUNNER.	0.50	225.00	112.50
09/29/06	RDJ	PREPARE FOR AND ATTEND DEPOSITION OF E. FOSTER, CHAIRMAN OF CARES; TRAVEL FROM NAPLES TO BRADENTON.	9.00	175.00	1,575.00
09/29/06	MDM	PREPARE EXHIBITS FOR DEPOSITION OF E. FOSTER; ATTEND DEPOSITION OF E. FOSTER; TRAVEL FROM MARCO ISLAND TO SARASOTA.	8.80	185.00	1,628.00
09/29/06	KSH	PHONE CONFERENCE WITH M. MOONEY AND D. JACKSON RE: DEPOSITION.	0.30	225.00	67.50

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10/02/06	MAM	WORK SESSION WITH M. MOONEY AND D. JACKSON; RESEARCH CONCERNING REQUEST FOR ADMISSIONS; LEGAL RESEARCH RE: REQUEST FOR ADMISSIONS DEEMED ADMITTED WHEN RESPONSE UNTIMELY; DRAFT MOTION; ORGANIZE EXHIBITS; PREPARE FOR TRANSMITTAL OF SAME TO COURT.	1.90	100.00	190.00
10/02/06	MDM	STRATEGY SESSION WITH M. MARKEN RE: PREPARATION OF MOTION TO DEEM REQUEST FOR ADMISSIONS ADMITTED, FEDERAL RULE OF CIVIL PROCEDURE RE: REQUEST FOR ADMISSIONS; STRATEGY SESSION WITH D. JACKSON RE: PREPARATION OF SUMMARY OF STATUS OF LITIGATION FOR COUNCIL; REVIEW AND EDIT MEDIATION STATEMENT; STRATEGY SESSION WITH D. JACKSON RE: SAME; PREPARE AND FILE NOTICE OF CONTINUED DEPOSITION OF E. FOSTER; RECEIVE AND REVIEW AND EMAIL COMMENTS ON JOINT MOTION ON ENLARGEMENT OF TIME TO S. GOLD; SEVERAL EMAIL CORRESPONDENCES TO S. GOLD, K. HENNESSY AND D. JACKSON RE: MEDIATION CONTINUATION; RECEIVE AND REVIEW JOINT MOTION FOR ENLARGEMENT OF TIME TO COMPLETE DEPOSITION.	2.10	185.00	388.50
10/02/06	RDJ	DRAFT, EDIT AND FINALIZE MEDIATION STATEMENT; RECEIVE AND REVIEW STIPULATED MOTION FOR ENLARGEMENT OF TIME TO COMPLETE DEPOSITIONS; REVISE MOTION TO DEEM REQUESTS FOR ADMISSION ADMITTED; LEGAL RESEARCH RE: REQUESTS FOR ADMISSION.	4.40	175.00	770.00
10/02/06	KSH	RECEIVE AND REVIEW MEDIATION STATEMENT; RECEIVE AND REVIEW EMAIL FROM P. GENZLER TO M. FITE; RECEIVE AND REVIEW EMAIL FROM S. GOLD; RECEIVE AND REVIEW EMAIL FROM S. BUNNER.	1.00	225.00	225.00
10/03/06	MAM	LEGAL RESEARCH RE: RULE ELEVEN FEDERAL RULES OF CIVIL PROCEDURE; LEGAL RESEARCH RE: CERTIFICATE OF SERVICE AND SIGNATURE REQUIREMENTS UNDER RULE ELEVEN AND IN CASE LAW; WORK SESSION WITH M. MOONEY ON FINDINGS.	2.10	100.00	210.00
10/03/06	MDM	RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCES RE: UPCOMING MEDIATION; REVIEW E. FOSTER OUTLINE; REVIEW, REVISE AND EDIT MOTION TO DEEM REQUEST FOR ADMISSIONS ADMITTED; DRAFT ADDITIONAL ARGUMENT RE: PLAINTIFF'S FAILURE TO EXECUTE OR SUBMIT TIMELY DISCOVERY RESPONSES; RECEIVE AND REVIEW PLAINTIFF'S MOTION TO STRIKE EXPERT WITNESS; RECEIVE AND REVIEW PLAINTIFF'S	2.50	185.00	462.50

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		REQUEST TO DEEM RESPONSE; RECEIVE AND REVIEW ORDER ON STIPULATION TO EXTEND DISCOVERY DEADLINE; DRAFT SUMMARY OF LITIGATION STATUS; PHONE CONFERENCE WITH AND EMAIL CORRESPONDENCE TO B. MOSS RE: SAME.			
10/03/06	RDJ	REVISE MOTION TO DEEM REQUESTS FOR ADMISSION ADMITTED; RECEIVE AND REVIEW CARES' MOTION TO EXCLUDE EXPERT WITNESS REPORT AND MOTION TO AMEND RESPONSE TO REQUESTS FOR ADMISSION; RECEIVE AND REVIEW ORDER RE: EXTENSION FOR COMPLETING DISCOVERY; REVIEW AND REVISE SUMMARY OF LITIGATION PREPARED FOR B. MOSS; PREPARE FOR MEDIATION.	3.40	175.00	595.00
10/03/06	KSH	RECEIVE AND REVIEW EMAIL FROM P. GENZLER TO R. CAPLAN WITH MEMO; REVIEW AND REVISE SUMMARY FOR CLIENT; RECEIVE AND REVIEW EMAIL FROM M. MOONEY TO B. MOSS WITH SUMMARY; RECEIVE AND REVIEW EMAIL FROM R. CAPLAN RE: RESPONSE; PREPARE FOR MEDIATION.	2.00	225.00	450.00
10/04/06	RDJ	PREPARE FOR AND ATTEND MEDIATION CONFERENCE WITH K. HENNESSY, B. MOSS AND R. JOEL; TRAVEL TO AND FROM NAPLES FOR MEDIATION CONFERENCE.	14.50	175.00	2,537.50
10/04/06	KSH	PREPARE FOR AND ATTEND MEDIATION IN NAPLES; RETURN TO BRADENTON; RECEIVE AND REVIEW EMAILS FROM P. GENZLER WITH DRAFT LETTER; RESPOND TO SAME.	14.50	225.00	3,262.50
10/05/06	KSH	RECEIVE AND REVIEW EMAILS FROM P. GENZLER RE: EPA DISCUSSIONS; PHONE CONFERENCE WITH B. MOSS RE: SETTLEMENT, EXECUTIVE SESSION AND STATUS WITH EPA; PHONE CONFERENCE WITH P. GENZLER AND D. JACKSON; RECEIVE AND REVIEW EMAIL TO COUNCIL FROM B. MOSS.	2.00	225.00	450.00
10/06/06	RDJ	RECEIVE AND REVIEW ORDER RE: REQUESTS FOR ADMISSION; FILE ORGANIZATION FOR LITIGATION AND REGULATORY ISSUES; PHONE CONFERENCE WITH K. HENNESSY, B. MOSS AND R. JOEL RE: REMOVAL OF DEBRIS PILE, ENVIRONMENTAL PROTECTION AGENCY AND QUALITY ENTERPRISES; FOLLOW UP PHONE CONFERENCE WITH P. GENZLER; DRAFT AND EDIT GENERAL RELEASE TO BE USED IN SETTLEMENT.	4.40	175.00	770.00
10/06/06	KSH	WORK SESSION WITH D. JACKSON RE: RELEASE; ATTEND PHONE CONFERENCE WITH R. JOEL AND B. MOSS.	1.00	225.00	225.00
10/07/06	KSH	RECEIVE AND REVIEW ORDER GRANTING CARES'	1.60	225.00	360.00

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		MOTION TO AMEND RESPONSE TO REQUEST FOR ADMISSIONS; RECEIVE AND REVIEW ORDER GRANTING EXTENSION OF TIME ON DISCOVERY; RECEIVE AND REVIEW ORDER GRANTING ENLARGEMENT OF TIME; RECEIVE AND REVIEW NOTICE OF COMPLIANCE; RECEIVE AND REVIEW EMAIL WITH LETTER TO ENVIRONMENTAL PROTECTION AGENCY FROM P. GENZLER.			
10/09/06	MDM	SEVERAL EMAIL CORRESPONDENCES RE: E. FOSTER RESIGNATION AS CARES CHAIRMAN, PRESS RELEASES ON SETTLEMENT AND MEDIATION; RECEIVE AND REVIEW DEPOSITION TRANSCRIPT OF E. FOSTER; RECEIVE AND REVIEW DRAFT LETTER OF SUPPORT BY CARES TO AGENCIES.	0.80	185.00	148.00
10/09/06	RDJ	PHONE CONFERENCES WITH R. JOEL RE: COLLIER BOULEVARD CONSTRUCTION PROGRAM; REVISE GENERAL RELEASE; REVIEW AND REVISE LETTER FROM P. GENZLER TO BE SENT TO ENVIRONMENTAL PROTECTION AGENCY ON BEHALF OF QUALITY AND THE CITY OF MARCO ISLAND; EMAIL CORRESPONDENCE WITH P. GENZLER RE: CHANGES TO LETTER; EMAIL CORRESPONDENCE WITH S. BUNNER, ATTORNEY FOR QUALITY, RE: GENERAL RELEASE; RECEIVE AND REVIEW NEWS ARTICLE RE: CARES' PUBLIC COMMENTS ON SETTLEMENT AGREEMENT; EMAIL CORRESPONDENCE WITH AND PHONE CONFERENCES WITH S. GOLD RE: GENERAL RELEASE AND LETTERS REQUIRED FROM CARES PURSUANT TO SETTLEMENT AGREEMENT; RECEIVE AND REVIEW LETTER OF SUPPORT FROM CARES RE: REMOVAL OF DEBRIS PILE.	2.40	175.00	420.00
10/09/06	KSH	REVIEW AND REVISE LETTER TO ENVIRONMENTAL PROTECTION AGENCY; RECEIVE AND REVIEW FINAL STATEMENT; REVIEW AND REVISE GENERAL RELEASE; FAX FROM R. JOEL; RECEIVE AND REVIEW EMAILS FROM P. GENZLER AND D. JACKSON; RECEIVE AND REVIEW EMAILS RE: RESIGNATION AND LETTER OF SUPPORT; PREPARE FOR AND ATTEND EXECUTIVE SESSION OF CITY COUNCIL IN MARCO ISLAND; RETURN TO BRADENTON.	8.00	225.00	1,800.00
10/10/06	MDM	SEVERAL EMAIL CORRESPONDENCES RE: RELEASE LANGUAGE AND REQUEST BY CARES FOR MODIFICATION OF SAME; RECEIVE AND REVIEW EMAIL FROM B. MOSS RE: PRESS ON SETTLEMENT.	0.40	185.00	74.00
10/10/06	RDJ	EMAIL CORRESPONDENCE WITH ATTORNEYS FOR CARES RE: MODIFICATIONS TO DRAFT GENERAL	0.40	175.00	70.00

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		RELEASE.			
10/10/06	KSH	RECEIVE AND REVIEW ORDER CLOSING FILE; RECEIVE AND REVIEW EMAILS RE: RELEASES; RECEIVE AND REVIEW NEWS RESPONSES; WORK SESSION WITH D. JACKSON RE: RELEASE; RECEIVE AND REVIEW NOTICE OF SETTLEMENT.	1.20	225.00	270.00
10/11/06	RDJ	EMAIL CORRESPONDENCE WITH ATTORNEYS FOR CARES AND QUALITY ENTERPRISES RE: LANGUAGE IN GENERAL RELEASE; REVISE GENERAL RELEASE.	1.00	175.00	175.00
10/11/06	KSH	RECEIVE AND REVIEW EMAIL FROM D. JACKSON TO S. GOLD RE: RELEASE; RECEIVE AND REVIEW RESPONSE FROM S. GOLD; RESPOND TO S. GOLD'S EMAIL; RECEIVE AND REVIEW RESPONSE FROM S. GOLD.	1.00	225.00	225.00
10/13/06	RDJ	RECEIVE AND REVIEW CORRESPONDENCE FROM ATTORNEY FOR QUALITY ENTERPRISES AND COUNSEL FOR ENVIRONMENTAL PROTECTION AGENCY RE: REMOVAL OF DEBRIS PILE; RECEIVE AND REVIEW DRAFT GENERAL RELEASE, LETTER OF SUPPORT RE: PLAN TO REMOVE DEBRIS PILE, AND LETTER RE: RICO CLAIM FROM S. GOLD.	0.60	175.00	105.00
10/13/06	KSH	PHONE CONFERENCE WITH L. DOUGLASS RE: DEBRIS PILE; RECEIVE AND REVIEW EMAILS FROM S. GOLD RE: SETTLEMENT DOCUMENTS; RECEIVE AND REVIEW EMAILS FORM R. CAPLAN RE: DEBRIS PILE; RECEIVE AND REVIEW EMAILS FROM P. GENZLER.	1.80	225.00	405.00
10/16/06	KSH	WORK SESSION WITH D. JACKSON RE: REVISIONS TO RELEASE AND LETTERS; RECEIVE AND REVIEW EMAIL FROM D. JACKSON TO S. GOLD; RECEIVE AND REVIEW FAX FROM S. GOLD; RECEIVE AND REVIEW PHOTOGRAPHS OF DEBRIS PILE; RECEIVE AND REVIEW AMENDED NOTICE OF HEARING.	1.20	225.00	270.00
10/18/06	KSH	RECEIVE AND REVIEW EMAIL FROM S. GOLD.	0.20	225.00	45.00
10/19/06	RDJ	EMAIL CORRESPONDENCE WITH S. GOLD RE: ISSUES WITH DRAFTS OF GENERAL RELEASE AND LETTERS REQUIRED PURSUANT TO MEDIATION SETTLEMENT AGREEMENT; RECEIVE AND REVIEW GENERAL RELEASE AND LETTERS FROM S. GOLD AND CARES; RECEIVE AND REVIEW CORRESPONDENCE FROM P. GENZLER AND COUNSEL FOR ENVIRONMENTAL PROTECTION AGENCY RE: REMOVAL OF DEBRIS PILE; PHONE CONFERENCE WITH S. BUNNER RE: SUPPORT LETTER FROM S. GOLD AND CARES.	1.30	175.00	227.50
10/19/06	MDM	RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCES FROM B. MOSS, S. BUNNER, K. HENNESSY AND D. JACKSON RE: STATUS OF RELEASE,	0.40	185.00	74.00

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		SUPPORT LETTER AND PARTIES APPROVAL OF THE SAME.			
10/19/06	KSH	RECEIVE AND REVIEW EMAILS FROM B. MOSS RE: CARES ACTIONS; RECEIVE AND REVIEW EMAILS FROM S. GOLD, S. BUNNER AND D. JACKSON RE: RELEASE AND LETTERS; RECEIVE AND REVIEW EMAILS FROM P. GENZLER, R. CAPLAN AND L. GAUDRO RE: AGGREGATE PILE AND PHOTOS; WORK SESSION WITH D. JACKSON.	1.20	225.00	270.00
10/23/06	MDM	RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCE FROM B. MOSS RE: PUBLIC RECORDS REQUESTS FROM CARES MEMBERS AND IMPACT ON SETTLEMENT AGREEMENT.	0.30	185.00	55.50
10/23/06	RDJ	EMAIL CORRESPONDENCE WITH B. MOSS, CITY MANAGER, REGARDING PUBLIC RECORDS REQUEST FROM MEMBER OF CARES; REVIEW AND ANALYZE MEDIATION SETTLEMENT AGREEMENT.	0.40	175.00	70.00
10/23/06	KSH	RECEIVE AND REVIEW NUMEROUS EMAILS FROM B. MOSS AND D. JACKSON RE: CARES ACTIONS.	0.50	225.00	112.50
10/25/06	RDJ	PHONE CONFERENCES WITH P. GENZLER AND R. JOEL REGARDING DISPOSAL OF DEBRIS PILE; RECEIVE AND REVIEW DRAFT LETTER TO COLLIER COUNTY LANDFILL; EMAIL CORRESPONDENCE WITH P. GENZLER RE: SAME.	0.70	175.00	122.50
10/25/06	KSH	RECEIVE AND REVIEW EMAILS FROM P. GENZLER; RECEIVE AND REVIEW EMAILS IN REPLY FROM D. JACKSON.	0.30	225.00	67.50
10/26/06	RDJ	PHONE CONFERENCES WITH COUNSEL FOR CARES RE: B. NEYLON'S RESIGNATION FROM CARES.	0.30	175.00	52.50
10/26/06	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS RE: INVESTIGATION STATEMENT; RECEIVE AND REVIEW EMAIL FROM R. CAPLAN TO P. GENZLER; WORK SESSION WITH D. JACKSON RE: CONTACTING S. BUNNER; RECEIVE AND REVIEW EMAIL TO R. JOEL RE: LANDFILL DEAL.	1.00	225.00	225.00
11/01/06	KSH	RECEIVE AND REVIEW EMAIL FROM S. BUNNER RE: CARES SETTLEMENT CHECK; RESPOND TO SAME; WORK SESSION WITH D. JACKSON RE: SAME.	0.30	225.00	67.50
11/02/06	MDM	STRATEGY SESSION WITH D. JACKSON RE: FOSTER'S POSTING ON WEBSITE AND CONFERENCE CALL WITH MEDIATOR; REVIEW E. FOSTER'S RESIGNATION LETTER ON CARES WEBSITE IN PREPARATION FOR RESEARCH ON VIOLATIONS OF SETTLEMENT AGREEMENT AND MEDIATION CONFIDENTIALITY.	1.10	185.00	203.50
11/02/06	KSH	OFFICE CONFERENCE WITH D. JACKSON RE: STATUS;	1.90	225.00	427.50

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		PHONE CONFERENCE WITH D. JACKSON AND S. BUNNER; PHONE CONFERENCE WITH D. PROLMAN; PHONE CONFERENCE WITH B. MOSS; RECEIVE AND REVIEW EMAILS FROM L. DOUGLASS RE: DEPOSITIONS; RESPOND TO SAME.			
11/02/06	RDJ	CONFERENCE CALL WITH K. HENNESSY AND S. BUNNER RE: ISSUES INVOLVING SETTLEMENT AGREEMENT; PHONE CONFERENCE WITH B. MOSS RE: SETTLEMENT AGREEMENT ISSUES AND REMOVAL OF DEBRIS PILE; RECEIVE AND REVIEW DRAFT LETTER TO COLLIER COUNTY LANDFILL RE: REMOVAL OF DEBRIS PILE; PHONE CONFERENCE WITH K. HENNESSY AND D. PROLMAN (MEDIATOR) RE: VIOLATION OF MEDIATION CONFIDENTIALITY; ORGANIZE DOCUMENTS RE: SETTLEMENT AGREEMENT AND RELATED ISSUES.	2.20	175.00	385.00
11/03/06	MDM	STRATEGY SESSION WITH K. HENNESSY RE: RESEARCH NEEDED ON SETTLEMENT AGREEMENT ENFORCEMENT, BREACH OF CONFIDENTIALITY AND POSTING BY E. FOSTER ON WEBSITE AND OTHER ACTION BY CARES MEMBERS; REVIEW SETTLEMENT AGREEMENT; BEGIN RESEARCH ON ENFORCEABILITY OF SETTLEMENT AGREEMENT.	2.10	185.00	388.50
11/03/06	KSH	OFFICE CONFERENCE WITH M. MOONEY RE: RESEARCH FOR MOTION FOR SANCTIONS AND TO ENFORCE SETTLEMENT; PHONE CONFERENCE WITH COUNCILMAN POPOFF; OFFICE CONFERENCE WITH D. JACKSON; RECEIVE AND REVIEW EMAIL TO B. NEYLON.	2.00	225.00	450.00
11/03/06	RDJ	PHONE CONFERENCE WITH COUNCILMAN POPOFF; RECEIVE AND REVIEW CORRESPONDENCE RE: PROPOSED RESOLUTIONS.	0.40	175.00	70.00
11/06/06	MDM	RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCE FROM S. BUNNER AND K. HENNESSY RE: CARES BREACH OF SETTLEMENT AGREEMENT, HOLDING OF FUNDS AND CONTACT FROM PRESS.	0.40	185.00	74.00
11/06/06	KSH	RECEIVE AND REVIEW EMAIL FROM S. BUNNER; RESPOND TO SAME; RECEIVE AND REVIEW EMAILS FROM B. MOSS; WORK SESSION WITH D. JACKSON.	0.90	225.00	202.50
11/07/06	MDM	RESEARCH CONCERNING FEDERAL RULES, LOCAL RULES, CASE MANAGEMENT ORDER AND CASE LAW ON ENFORCEMENT OF SETTLEMENT AGREEMENT, BREACH OF MEDIATION CONFIDENTIALITY, SANCTIONS AND PENALTIES FOR VIOLATIONS; STRATEGY SESSION WITH K. HENNESSY RE: SAME	4.60	185.00	851.00

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		AND PREPARATION OF MOTION FOR SANCTIONS, MOTION FOR CONTEMPT OR MOTION TO ENFORCE SETTLEMENT AGREEMENT; CONFERENCE CALL WITH K. HENNESSY AND B. MOSS RE: OPTIONS, PREPARATION OF MOTIONS TO ENFORCE SETTLEMENT AGREEMENT AND/OR MOTION FOR CONTEMPT; EMAIL CORRESPONDENCE WITH K. HENNESSY RE: MOTION TO REOPEN CASE FOR PURPOSES OF FILING MOTION FOR SANCTIONS, CONTEMPT AND ENFORCEMENT OF SETTLEMENT AGREEMENT.			
11/07/06	KSH	RECEIVE AND REVIEW RESEARCH ON MOTION FOR SANCTIONS; WORK SESSION WITH M. MOONEY; RECEIVE AND REVIEW EMAIL FROM T. DISCIULLO; RESPOND TO SAME; PHONE CONFERENCE WITH B. MOSS; PHONE CONFERENCE WITH L. DILLON; RECEIVE AND REVIEW NEWS ARTICLES.	1.50	225.00	337.50
11/08/06	MDM	SEVERAL EMAIL CORRESPONDENCE WITH K. HENNESSY RE: PREPARATION OF MOTION TO REOPEN CASE; CONFERENCE CALL WITH B. MOSS, D. JACKSON AND K. HENNESSY RE: STRATEGY, RESPONSE TO B. NEYLON'S RESOLUTION, PREPARATION OF MOTION FOR CONTEMPT AND ENFORCEMENT OF SETTLEMENT AGREEMENT, CONTINUED INVESTIGATION OF ASBESTOS, PREPARATION OF MOTION FOR SANCTIONS AND ENFORCEMENT OF SETTLEMENT AGREEMENTS; SEVERAL EMAIL CORRESPONDENCE RE: RESPONSE TO PROPOSED REFERENDUM BY B. NEYLON.	1.40	185.00	259.00
11/08/06	KSH	PHONE CALL WITH B. MOSS RE: RESPONSE TO RESOLUTION FROM B. NEYLON; CONTAMINATION CLEANUP AND MOTIONS; RECEIVE AND REVIEW EMAILS TO T. DISCIULLO.	0.50	225.00	112.50
11/08/06	RDJ	STRATEGY SESSION WITH K. HENNESSY AND M. MOONEY TO DISCUSS ISSUES RE: RESOLUTION PROPOSED BY B. NEYLON AND ENFORCEMENT OF SETTLEMENT AGREEMENT; FOLLOW UP PHONE CONFERENCE WITH B. MOSS RE: SAME; DRAFT RESPONSE TO PROPOSED RESOLUTION FROM B. NEYLON; DRAFT LETTER TO S. GOLD, ATTORNEY FOR CARES, RE: NEED TO DISCUSS OUTSTANDING ISSUES.	2.50	175.00	437.50
11/09/06	MDM	SEVERAL EMAIL CORRESPONDENCE WITH B. MOSS RE: CONFERENCE CALL ON STRATEGY; CONFERENCE CALL WITH B. MOSS, D. JACKSON AND T. DISCIULLO RE: STRATEGY, CONTACT WITH S. GOLD AND CARES, MEDIATION DISCLOSURES AND VIOLATIONS OF	1.00	185.00	185.00

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		LOCAL RULES AND COURT ORDER, SANCTIONS, ENFORCEMENT OF SETTLEMENT AGREEMENT; PHONE CONFERENCE WITH K. HENNESSY RE: SAME.			
11/09/06	RDJ	CONFERENCE CALL WITH M. MOONEY, B. MOSS AND T. DISCIULLO TO DISCUSS ISSUES INVOLVING CARES AND SETTLEMENT AGREEMENT AND FOLLOW UP; PHONE CONFERENCES WITH CARES' ATTORNEY RE: CONFERENCE CALL TO DISCUSS OUTSTANDING ISSUES.	1.00	175.00	175.00
11/13/06	KSH	RECEIVE AND REVIEW EMAILS FROM L. DONALDSON; RESPOND TO SAME; PHONE CONFERENCE WITH S. BUNNER AND D. JACKSON RE: SAME; PREPARE FOR AND ATTEND CONFERENCE CALL WITH S. GOLD; EMAIL FROM S. BUNNER; PHONE CONFERENCE WITH B. MOSS RE: SAME; WORK SESSION WITH D. JACKSON.	1.80	225.00	405.00
11/13/06	RDJ	PHONE CONFERENCES WITH K. HENNESSY, S. BUNNER, S. GOLD AND B. MOSS.	1.00	175.00	175.00
11/15/06	MDM	SEVERAL EMAIL CORRESPONDENCE WITH D. JACKSON AND K. HENNESSY RE: NEWS POSTINGS ON CARES WEBSITE BY E. FOSTER AND COMMUNICATIONS FROM D. ERMAN RE: TERMS OF SETTLEMENT, SETTLEMENT ENFORCEMENT, CONTACT WITH S. GOLD AND STRATEGY RE: RESPONDING TO SAME.	0.60	185.00	111.00
11/15/06	RDJ	PHONE CONFERENCE WITH T. DISCIULLO RE: RESPONSE FROM CARES TO ISSUES RAISED BY CITY; RECEIVE AND REVIEW CORRESPONDENCE FROM CITY RE: COMMENTS FROM CARES AND E. FOSTER; PHONE CONFERENCES WITH ATTORNEYS FOR CARES : CARES' RESPONSE: FOLLOW UP CONFERENCE CALL.	1.80	175.00	315.00
11/15/06	KSH	RECEIVE AND REVIEW EMAIL FROM D. ERMAN AND J. DISCIULLO RE: CARES RESPONSE; RESPOND TO SAME; RECEIVE AND REVIEW EMAIL FROM D. JACKSON; RESPOND TO SAME; RECEIVE AND REVIEW L. DOUGLASS EMAIL RE: WEBSITE.	1.20	225.00	270.00
11/17/06	MDM	RECEIVE AND REVIEW EMAIL CORRESPONDENCE FROM B. MOSS RE: PRESS RELATING TO SETTLEMENT WITH CARES.	0.20	185.00	37.00
11/17/06	KSH	RECEIVE AND REVIEW PROPOSED LANGUAGE; RECEIVE AND REVIEW REVISED LANGUAGE; RESPOND TO SAME.	2.00	225.00	450.00
11/20/06	MDM	RECEIVE AND REVIEW PLAINTIFF'S MOTION TO REOPEN, ENFORCE SETTLEMENT AGREEMENT AND MEMORANDUM OF LAW.	0.30	185.00	55.50
11/20/06	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH	1.50	225.00	337.50

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		S. GOLD AND S. BUNNER; RECEIVE AND REVIEW NUMEROUS EMAILS; PHONE CONFERENCE WITH B. MOSS AND L. DOUGLASS RE: SAME; RECEIVE AND REVIEW EMAILS FROM L. DILLON; RECEIVE AND REVIEW NOTIFICATION OF FILING OF MOTION BY CARES.			
11/20/06	RDJ	RECEIVE AND REVIEW CORRESPONDENCE FROM CITY RE: VARIOUS ISSUES INVOLVING CARES AND SETTLEMENT AGREEMENT; PHONE CONFERENCES WITH S. BUNNER RE: SETTLEMENT AGREEMENT ISSUES; CONFERENCE CALL WITH K. HENNESSY, S. BUNNER, AND S. GOLD RE: SETTLEMENT AGREEMENT ISSUES; FOLLOW UP CONFERENCE CALL WITH B. MOSS AND L. DOUGLASS RE: SAME; RECEIVE AND REVIEW CARES' MOTION TO REOPEN CASE, ENFORCE SETTLEMENT AGREEMENT.	3.20	175.00	560.00
11/21/06	MAM	WORK SESSION WITH M. MOONEY; RECEIVE AND REVIEW EMAIL; RESEARCH CONCERNING DEADLINE; RESPOND TO SAME.	0.60	100.00	60.00
11/21/06	MDM	CONTINUE RESEARCH CONCERNING CORPORATE AGENT RESIGNATION AND DISCLOSURE OF CONFIDENTIAL MEDIATION DETAILS; CONTINUE TO REVIEW PLAINTIFF'S MOTION TO REOPEN AND ATTACHED EXHIBITS; STRATEGY SESSION WITH K. HENNESSY AND D. JACKSON RE: PREPARATION OF RESPONSE TO SAME, CONTACT WITH THE CITY, CARES AND QUALITY ENTERPRISES RE: ENFORCEMENT OF SETTLEMENT AND DISCUSSIONS WITH CARES; REVIEW SEVERAL NEWS ARTICLES RE: CARES STATEMENT ON SETTLEMENT ENFORCEMENT.	4.30	185.00	795.50
11/21/06	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH CITY; PHONE CONFERENCE WITH S. BUNNER; RECEIVE AND REVIEW RESEARCH MEMORANDUM FROM S. BUNNER; RECEIVE AND REVIEW EMAIL FROM B. MOSS; REVIEW AND REVISE LETTER TO S. GOLD; PHONE CONFERENCE WITH S. GOLD AND D. ERMAN AND CITY; RECEIVE AND REVIEW EMAIL FROM S. GOLD TO L. DILLON; PHONE CONFERENCE WITH L. DILLON; RECEIVE AND REVIEW LETTER FROM S. GOLD.	3.00	225.00	675.00
11/21/06	RDJ	CONFERENCE CALL WITH K. HENNESSY, M. MOONEY, B. MOSS AND L. DOUGLASS TO DISCUSS SETTLEMENT AGREEMENT ISSUES AND FOLLOW UP; RECEIVE AND REVIEW LETTER FROM S. GOLD RE: MOTION TO REOPEN CASE AND ENFORCE SETTLEMENT AGREEMENT AND RELATED ISSUES; CONFERENCE	5.30	175.00	927.50

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		CALL WITH K. HENNESSY, B. MOSS, L. DOUGLASS, T. DISCIULLO, S. GOLD AND D. ERMAN TO DISCUSS ISSUES RE: SETTLEMENT AGREEMENT; FOLLOW UP PHONE CONFERENCE WITH CLIENT; DRAFT LETTER TO S. GOLD RE: CITY OF MARCO ISLAND'S DEMANDS ON QUALITY ENTERPRISES TO RECOVER EXPENSES DUE TO REMEDIATION; REVIEW AND REVISE "LETTER OF SUPPORT" TO BE PROVIDED BY CARES; DRAFT LETTER RE: B. NEYLON AND E. FOSTER; DRAFT LETTER TO S. GOLD RE: DOCUMENTS AND SETTLEMENT AGREEMENT; PHONE CONFERENCE WITH S. BUNNER AND K. HENNESSY RE: ISSUES WITH SETTLEMENT AGREEMENT.			
11/22/06	MAM	WORK SESSION WITH D. JACKSON AND M. MOONEY; RESEARCH CONCERNING DEADLINE AND DUE DATE IN FEDERAL RULES; EXAMINE FILE RE: CASE MANAGEMENT ORDER; REVIEW SAME; CALCULATE DATE; CALENDAR SAME.	1.30	100.00	130.00
11/22/06	MDM	STRATEGY SESSION WITH D. JACKSON RE: DEADLINE TO FILE RESPONSE TO CARES' MOTION; SEVERAL EMAIL CORRESPONDENCE AND STRATEGY SESSIONS WITH M. MARKEN RE: DEADLINE TO FILE RESPONSE TO CARES REQUEST TO REOPEN AND ENFORCE SETTLEMENT; RECEIVE AND REVIEW MEMORANDUM RE: MEDIATION DISCLOSURE.	0.60	185.00	111.00
11/22/06	RDJ	PHONE CONFERENCE WITH B. MOSS RE: LETTERS TO BE SENT TO CARES PURSUANT TO SETTLEMENT DISCUSSIONS; DRAFT, EDIT AND FINALIZE LETTER AND DOCUMENTS TO S. GOLD PURSUANT TO SETTLEMENT DISCUSSIONS.	1.50	175.00	262.50
11/27/06	KSH	PHONE CONFERENCE WITH L. DOUGLASS RE: CALL WITH DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENVIRONMENTAL PROTECTION AGENCY; WORK SESSION WITH D. JACKSON.	0.30	225.00	67.50
11/28/06	KSH	PHONE CONFERENCE WITH L. DOUGLASS RE: PHONE CONFERENCE; WORK SESSION WITH D. JACKSON RE: PHONE CONFERENCE WITH S. GOLD.	0.50	225.00	112.50
11/28/06	RDJ	PHONE CONFERENCES WITH L. DOUGLASS AND P. GENZLER RE: CONFERENCE CALL WITH DEPARTMENT OF ENVIRONMENTAL PROTECTION; PHONE CONFERENCES WITH S. GOLD'S OFFICE RE: CONFERENCE CALL WITH ALL PARTIES TO DISCUSS SETTLEMENT AGREEMENT; PHONE CONFERENCE WITH S. GOLD TO DISCUSS LETTERS AND DOCUMENTS PROVIDED BY THE CITY OF MARCO ISLAND PURSUANT TO SETTLEMENT NEGOTIATIONS; FOLLOW	1.20	175.00	210.00

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		UP.			
11/28/06	MDM	SEVERAL EMAIL CORRESPONDENCE WITH K. HENNESSY AND D. JACKSON RE: SETTLEMENT ENFORCEMENT BY CARES, CONTACT WITH CARES AND S. GOLD RE: CONFERENCE CALL TO DISCUSS SAME; PREPARE RESPONSE TO MOTION TO ENFORCE SETTLEMENT.	0.40	185.00	74.00
11/29/06	MAM	WORK SESSION WITH M. MOONEY; RESEARCH CONCERNING ELEMENTS AND DATES OF SIGNIFICANT EVENTS AND ACTIONS FOR TIMELINE; EXAMINE FILE FOR DATES AND ELEMENTS OF TIMELINE; ASSIST M. MOONEY IN DRAFTING SAME.	2.70	100.00	270.00
11/29/06	MDM	PREPARE OUTLINE OF RESPONSE TO CARES' MOTION TO ENFORCE SETTLEMENT; SEVERAL EMAIL CORRESPONDENCE WITH AND STRATEGY SESSION WITH M. MARKEN RE: PREPARATION OF CHRONOLOGY OF RELEVANT DATES OF ACTIONS BY B. NEYLON AND E. FOSTER AFTER MEDIATION AND SETTLEMENT; STRATEGY SESSION WITH D. JACKSON RE: EXTENSION OF TIME TO PREPARE RESPONSE TO CARES' MOTION TO ENFORCE SETTLEMENT, CONTACT WITH S. GOLD'S OFFICE, MEDIATION; CONTINUE TO DRAFT RESPONSE TO CARES' MOTION TO ENFORCE SETTLEMENT AGREEMENT; SEVERAL EMAIL CORRESPONDENCE WITH K. HENNESSY AND D. JACKSON RE: TRANSCRIPTION OF DEPOSITIONS AND REQUEST BY CARES FOR COST SHARING; REVIEW WEBSITE ("EARNMARCO.COM" AND "MARCOISLANDBLOG.COM") FOR STATEMENTS AND LETTERS BY B. NEYLON.	3.80	185.00	703.00
11/29/06	RDJ	PHONE CONFERENCE WITH B. MOSS RE: CARES' RESPONSE TO LETTERS AND DOCUMENTS OFFERED BY CITY PURSUANT TO SETTLEMENT DISCUSSIONS; DRAFT AND REVISE MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO CARES' MOTION TO REOPEN AND ENFORCE SETTLEMENT AGREEMENT; DRAFT AND REVISE LETTER TO S. GOLD TO FOLLOW UP ON STATUS OF DOCUMENTS AND SETTLEMENT DISCUSSIONS; REVIEW AND ORGANIZE DOCUMENTS RE: ENVIRONMENTAL PROTECTION AGENCY INVOLVEMENT IN REMOVAL OF DEBRIS PILE.	4.30	175.00	752.50
11/29/06	KSH	RECEIVE AND REVIEW EMAILS FROM B. MOSS, L. DOUGLASS AND D. JACKSON RE: SETTLEMENT ISSUES WITH DEP AND EPA; RECEIVE AND REVIEW EMAILS; WORK SESSION WITH D. JACKSON; WORK SESSION WITH M. MOONEY RE: RESPONSE TO MOTION.	1.20	225.00	270.00

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11/30/06	RDJ	REVIEW AND FINALIZE MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO CARES' MOTION TO REOPEN AND ENFORCE SETTLEMENT AGREEMENT; CORRESPOND S. BUNNER RE: MOTION FOR ENLARGEMENT OF TIME; FINALIZE LETTER TO S. GOLD RE: DOCUMENTS PURSUANT TO SETTLEMENT DISCUSSIONS; PHONE CONFERENCE WITH P. GENZLER RE: ENVIRONMENTAL PROTECTION AGENCY ISSUES: FOLLOW UP; RECEIVE AND REVIEW DRAFT WORK PLAN FOR REMOVAL OF DEBRIS PILE.	1.80	175.00	315.00
11/30/06	MDM	SEVERAL EMAIL CORRESPONDENCE AND PHONE CONFERENCE WITH D. JACKSON AND S. BUNNER RE: PREPARATION AND FILING OF JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO CARES' MOTION TO REOPEN AND ENFORCE SETTLEMENT AGREEMENT; CONTINUE TO DRAFT RESPONSE TO CARES' MOTION TO REOPEN AND ENFORCE SETTLEMENT; RESEARCH CONCERNING MOTION TO REOPEN; STRATEGY SESSION WITH D. JACKSON RE: ISSUES WITH MOTION TO ENFORCE SETTLEMENT AND COURT JURISDICTION.	2.40	185.00	444.00
11/30/06	KSH	REVIEW AND REVISE LETTERS TO S. GOLD RE: RESPONSE TO LETERS; RECEIVE AND REVIEW MOTION FOR EXTENSION; RECEIVE AND REVIEW EMAILS TO AND FROM S. BUNNER.	1.00	225.00	225.00
11/30/06	KSH	RECEIVE AND REVIEW EMAILS TO S. BUNNER RE: JOINT MOTION FOR EXTENSION OF TIME FOR RESPONSE; RECEIVE AND REVIEW EMAILS FROM S. BUNNER IN RESPONSE.	0.30	225.00	67.50
12/01/06	RDJ	RECEIVE AND REVIEW REVISED WORK PLAN FOR REMOVAL OF DEBRIS PILE; RECEIVE AND REVIEW CORRESPONDENCE RE: ENVIRONMENTAL PROTECTION AGENCY AND DEPARTMENT OF ENVIRONMENTAL PROTECTION INVOLVEMENT WITH REMEDIATION EFFORTS AT SITES "A" AND "C"; PREPARE FOR AND PARTICIPATE IN CONFERENCE CALL WITH K. HENNESSY, CITY REPRESENTATIVES, QUALITY ENTERPRISES, CONSULTANT, ENVIRONMENTAL PROTECTION AGENCY STAFF AND DEPARTMENT OF ENVIRONMENTAL PROTECTION STAFF RE: REMEDIATION OF SITES "A" AND "C" AND FOLLOW UP; RECEIVE AND REVIEW ORDER GRANTING MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO CARES' MOTION TO REOPEN TO ENFORCE SETTLEMENT AGREEMENT.	3.30	175.00	577.50
12/01/06	MDM	STRATEGY SESSION WITH D. JACKSON RE: STATUS OF	1.80	185.00	333.00

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		COURT RULING ON MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO MOTION TO REOPEN TO ENFORCE SETTLEMENT AND CONTACT WITH MAGISTRATE JUDICIAL ASSISTANT; CONTINUE TO DRAFT RESPONSE TO REOPEN TO ENFORCE SETTLEMENT; RECEIVE AND REVIEW ORDER GRANTING MOTION FOR EXTENSION OF TIME TO ENFORCE SETTLEMENT.			
12/01/06	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH DEPARTMENT OF ENVIRONMENTAL PROTECTION AND ENVIRONMENTAL PROTECTION AGENCY; RECEIVE AND REVIEW ORDER GRANTING ENLARGEMENT OF TIME; RECEIVE AND REVIEW EMAIL FROM P. GENZLER; RECEIVE AND REVIEW EMAIL FROM R. CAPLAN RE: CLEANUP PLAN; RECEIVE AND REVIEW COMMENTS ON WORK PLAN.	1.50	225.00	337.50
12/04/06	MAM	RESEARCH CONCERNING ELEMENTS TO INCLUDE IN MOTION FOR SANCTIONS.	2.80	100.00	280.00
12/04/06	RDJ	RECEIVE AND REVIEW SITE "C" WORK PLAN.	0.50	175.00	87.50
12/06/06	MDM	RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCE WITH CITY COUNCIL AND CARES RE: REQUEST FOR PAYMENT OF DEPOSITION TRANSCRIPT COSTS AND STRATEGY SESSION WITH K. HENNESSY AND D. JACKSON RE: SETTLEMENT STATUS AND CONTACT WITH S. GOLD.	0.40	185.00	74.00
12/06/06	KSH	RECEIVE AND REVIEW EMAIL FROM T. DISCIULLO; RESPOND TO SAME.	0.30	225.00	67.50
12/06/06	RDJ	EMAIL CORRESPONDENCE WITH T. DISCIULLO RE: STATUS OF SETTLEMENT AGREEMENT WITH CARES AND FOLLOW UP PHONE CONFERENCE RE: SAME; RECEIVE AND REVIEW CORRESPONDENCE RE: SETTLEMENT AGREEMENT AND FOLLOW UP.	0.90	175.00	157.50
12/08/06	KSH	RECEIVE AND REVIEW EMAIL FROM L. DOUGLASS WITH ARTICLE.	0.20	225.00	45.00
12/11/06	MDM	STRATEGY SESSION WITH D. JACKSON RE: STATUS OF CARES' WITHDRAWAL OF MOTION TO ENFORCE SETTLEMENT, TRANSCRIPTION OF DEPOSITIONS, AND PREPARATION OF RESPONSE TO MOTION TO ENFORCE SETTLEMENT.	0.30	185.00	55.50
12/11/06	RDJ	PHONE CONFERENCE WITH S. GOLD RE: SETTLEMENT AGREEMENT AND ISSUE OF PAYING FOR DEPOSITION TRANSCRIPTS AND FOLLOW UP.	0.40	175.00	70.00
12/11/06	KSH	OFFICE CONFERENCE WITH D. JACKSON RE: CONTACT WITH S. GOLD.	0.20	225.00	45.00
12/12/06	MDM	SEVERAL EMAIL CORRESPONDENCE WITH D.	0.20	185.00	37.00

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		JACKSON RE: CARES WITHDRAWAL OF REQUEST FOR DEPOSITION TRANSCRIPTION AND WITHDRAWAL OF MOTION.			
12/12/06	RDJ	REVIEW CORRESPONDENCE RE: SETTLEMENT AGREEMENT; REVISE AND FINALIZE LETTERS REQUIRED TO FINALIZE SETTLEMENT AGREEMENT; DRAFT, EDIT AND FINALIZE OFFICIAL NOTIFICATION THAT CITY COUNCIL RATIFIED SETTLEMENT AGREEMENT; RECEIVE AND REVIEW NOTICE OF WITHDRAWAL OF MOTION TO REOPEN TO ENFORCE SETTLEMENT AGREEMENT; FOLLOW UP WITH S. GOLD; DRAFT, EDIT AND FINALIZE NOTICE OF WITHDRAWAL OF MOTION FOR SANCTIONS; PHONE CONFERENCE WITH B. MOSS RE: SETTLEMENT.	2.80	175.00	490.00
12/12/06	KSH	RECEIVE AND REVIEW NUMEROUS EMAILS AND DRAFT LETTERS FROM S. GOLD; RECEIVE AND REVIEW EMAILS AND LETTERS FROM D. JACKSON; RECEIVE AND REVIEW EMAILS FROM S. BUNNER; RECEIVE AND REVIEW EMAILS FROM B. MOSS; WORK SESSION WITH D. JACKSON; RECEIVE AND REVIEW NOTICE OF WITHDRAWAL OF MOTION FOR SANCTIONS; RECEIVE AND REVIEW NOTICE OF WITHDRAWAL; RECEIVE AND REVIEW LETTER FROM D. JACKSON TO S. GOLD RE: RATIFIED SETTLEMENT; RECEIVE AND REVIEW LETTER FROM D. JACKSON TO S. GOLD RE: RESPONSE TO SETTLEMENT PROPOSAL.	1.80	225.00	405.00
12/13/06	MDM	RECEIVE AND REVIEW CARES NOTICE OF VOLUNTARY DISMISSAL; RECEIVE AND REVIEW SUMMARY OF STATUS OF ALL CARES LITIGATION PREPARED BY B. MOSS.	0.40	185.00	74.00
12/13/06	KSH	RECEIVE AND REVIEW EMAILS FROM S. BUNNER, D. JACKSON AND S. GOLD RE: FINAL SETTLEMENT TASKS; RECEIVE AND REVIEW NOTICE OF DISMISSAL WITH PREJUDICE; RECEIVE AND REVIEW ORDER WITHDRAWING MOTION FOR SANCTIONS AND MOTION TO REOPEN CASE.	1.00	225.00	225.00
12/13/06	RDJ	PHONE CONFERENCE WITH B. MOSS RE: SETTLEMENT OF LAWSUIT; EMAIL CORRESPONDENCE WITH ATTORNEYS FOR CARES AND QUALITY ENTERPRISES RE: STATUS OF CASE; RECEIVE AND REVIEW CARES' NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE.	0.40	175.00	70.00
12/14/06	KSH	RECEIVE AND REVIEW ORDER CLOSING CASE WITH PREJUDICE.	0.20	225.00	45.00
12/15/06	KSH	RECEIVE AND REVIEW JUDGMENT SIGNED BY DEPUTY CLERK.	0.20	225.00	45.00
12/19/06	KSH	RECEIVE AND REVIEW LETTERS FROM CARES.	0.20	225.00	45.00

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12/22/06	RDJ	PHONE CONFERENCE WITH R. JOEL RE: STATUS OF SITE CLEANUP AND FOLLOW UP.	0.30	175.00	52.50
12/22/06	KSH	RECEIVE AND REVIEW STATUS ON MARCO CLEANUP.	0.20	225.00	45.00
01/10/07	RDJ	REVIEW AND REVISE WORK PLAN FOR SITE "A" CLEAN UP; PHONE CONFERENCE WITH R. JOEL AND L. GAUDIO RE: WORK PLAN AND FOLLOW UP CORRESPONDENCE.	2.40	195.00	468.00
01/12/07	RDJ	RECEIVE AND REVIEW WORK PLAN FOR SITE "A" SUBMITTED TO ENVIRONMENTAL PROTECTION AGENCY.	0.30	195.00	58.50
01/12/07	KSH	RECEIVE AND REVIEW SITE "A" WORK PLAN; PHONE CONFERENCE WITH D. JACKSON RE: SAME.	0.50	245.00	122.50
03/01/07	RDJ	CONFERENCE CALL WITH R. JOEL AND L. GAUDIO (QUALITY ENTERPRISES) RE: PREPARATION OF AGREEMENT PERTAINING TO DISPOSAL OF DEBRIS PILE AND DRAFT THE SAME; RECEIVE AND REVIEW EMAILS RE: AGREEMENT BETWEEN QUALITY AND THE CITY.	3.70	195.00	721.50
03/01/07	KSH	REVIEW EMAILS BETWEEN CITY AND D. JACKSON AND EPA; WORK SESSION WITH D. JACKSON RE: SAME.	0.50	245.00	122.50
03/02/07	RDJ	DRAFT CONTRACT BETWEEN CITY OF MARCO ISLAND AND QUALITY ENTERPRISES RE: REMOVAL OF DEBRIS PILE.	2.00	195.00	390.00
03/06/07	RDJ	DRAFT CONTRACT BETWEEN THE CITY OF MARCO ISLAND AND QUALITY ENTERPRISES RE: REMOVAL OF DEBRIS PILE.	4.70	195.00	916.50
03/07/07	RDJ	DRAFT CONTRACT BETWEEN THE CITY OF MARCO ISLAND AND QUALITY ENTERPRISES RE: REMOVAL OF DEBRIS PILE; PHONE CONFERENCES WITH B. MOSS, R. JOEL AND CITY STAFF RE: VARIOUS ISSUES WITH CONTRACT; RECEIVE AND REVIEW DOCUMENTS FROM CITY STAFF FOR USE AS EXHIBITS TO CONTRACT.	7.00	195.00	1,365.00
03/08/07	RDJ	DRAFT AND REVISE CONTRACT BETWEEN THE CITY OF MARCO ISLAND AND QUALITY ENTERPRISES RE: REMOVAL OF DEBRIS PILE; CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY, DEPARTMENT OF ENVIRONMENTAL PROTECTION, AND THE CITY TO DISCUSS VARIOUS ISSUES RE: REMOVAL OF DEBRIS PILE; PHONE CONFERENCE WITH R. JOEL RE: REVISIONS TO CONTRACT AND REVISE CONTRACT ACCORDINGLY; RECEIVE AND REVIEW LETTER FROM CITY TO ENVIRONMENTAL PROTECTION AGENCY.	5.50	195.00	1,072.50

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03/12/07	RDJ	EDIT CONTRACT BETWEEN CITY AND QUALITY ENTERPRISES RE: REMOVAL OF DEBRIS PILE AND PREPARE EXHIBITS FOR CONTRACT.	1.40	195.00	273.00
03/13/07	KSH	RECEIVE AND REVIEW EMAILS RE: CONFERENCE AND SETTLEMENT; RECEIVE AND REVIEW CONTRACT.	1.00	245.00	245.00
03/13/07	RDJ	REVISE AND EDIT CONTRACT BETWEEN THE CITY AND QUALITY ENTERPRISES; PHONE CONFERENCE WITH B. MOSS RE: REVISIONS TO CONTRACT; FOLLOW UP CORRESPONDENCE RE: REVISIONS.	1.80	195.00	351.00
03/14/07	KSH	RECEIVE AND REVIEW PROPOSED CONTRACT; OFFICE CONFERENCE WITH D. JACKSON RE: SAME.	1.00	245.00	245.00
03/14/07	RDJ	REVISE CONTRACT BETWEEN CITY OF MARCO ISLAND AND QUALITY ENTERPRISES; VARIOUS PHONE CONFERENCES WITH AND CORRESPONDENCE WITH R. JOEL AND B. MOSS RE: CONTRACT; DRAFT, EDIT, FINALIZE LETTER TO P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: DEMANDS BY CITY ON QUALITY FOR SITE REMEDIATION COSTS.	5.20	195.00	1,014.00
03/15/07	RDJ	RECEIVE AND REVIEW COMMENTS AND REQUESTED CHANGES TO CONTRACT BY QUALITY ENTERPRISES; CONFERENCE CALL WITH B. MOSS AND R. JOEL RE: CONTRACT LANGUAGE AND QUALITY'S REQUESTED CHANGES; RECEIVE AND REVIEW PROPOSED REVISED CONTRACT FROM P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES; FOLLOW UP CONFERENCE CALL WITH B. MOSS AND R. JOEL; NEGOTIATE CONTRACT LANGUAGE WITH P. GENZLER; REVISE, FINALIZE CONTRACT BETWEEN CITY AND QUALITY ENTERPRISES.	7.50	195.00	1,462.50
03/16/07	RDJ	EMAIL CORRESPONDENCE WITH B. MOSS AND R. JOEL RE: FINALIZED CONTRACT BETWEEN CITY OF MARCO ISLAND AND QUALITY ENTERPRISES; EMAIL CORRESPONDENCE WITH QUALITY'S ATTORNEY RE: SIGNING OF CONTRACT AND TIMELY DELIVERY TO THE CITY OFFICES.	0.30	195.00	58.50
04/12/07	MDM	RECEIVE AND REVIEW SEVERAL EMAIL CORRESPONDENCE RE: NEW LAWSUIT FILED BY CARES, ARTICLES RE: SAME.	0.40	195.00	78.00
04/12/07	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS RE: NEW COMPLAINT; RESPOND TO SAME; RECEIVE AND REVIEW RESPONSE FROM B. MOSS; VOICE MAIL FROM S. GOLD; EMAIL TO S. GOLD; PHONE CONFERENCE WITH L. DILLON; RECEIVE AND REVIEW COMPLAINT AND ATTACHMENTS.	1.80	245.00	441.00
04/12/07	KSH	RECEIVE AND REVIEW EMAIL FROM L. DOUGLASS RE:	0.30	245.00	73.50

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		CALL FROM B. CAPLIN AND MEETING WITH EPA; RESPOND TO SAME.			
04/12/07	RDJ	REVIEW CORRESPONDENCE RE: NEW COMPLAINT FILED BY CARES AGAINST THE CITY: CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY RE: SITE "C" REMEDIATION; RECEIVE AND REVIEW COMPLAINT FOR DECLARATORY RELIEF FILED BY CARES AGAINST THE CITY OF MARCO ISLAND AND QUALITY ENTERPRISES; RECEIVE AND REVIEW CITY COUNCIL MINUTES FROM MARCH 19, 2007 MEETING PROVIDED TO ENVIRONMENTAL PROTECTION AGENCY BY B. NEYLON; REVIEW AND ORGANIZE SETTLEMENT AGREEMENT, DRAFTS OF SETTLEMENT AGREEMENT, NOTES FROM MEDIATION AND RELATED DOCUMENTS.	3.80	195.00	741.00
04/13/07	MDM	SEVERAL EMAIL CORRESPONDENCE RE: ARTICLES AND SUIT BROUGHT BY CARES.	0.40	195.00	78.00
04/13/07	KSH	RECEIVE AND REVIEW EMAILS FROM L. DOUGLASS RE: MEETING WITH EPA; SCHEDULE MEETING; RECEIVE AND REVIEW NAPLES NEWS ARTICLE; RECEIVE AND REVIEW INFORMATION RE: B. NEYLON AND CARES CONTRIBUTION; REVIEW EMAIL FROM B. MOSS WITH ATTACHMENTS.	1.50	245.00	367.50
04/13/07	RDJ	REVIEW CORRESPONDENCE FROM B. MOSS RE: CARES LAWSUIT; RECEIVE AND REVIEW DOCUMENTATION RELATED TO PUBLIC RECORDS REQUEST MADE BY B. NEYLON ON CITY AND PAYMENT BY CARES.	0.50	195.00	97.50
04/16/07	RDJ	FILE ORGANIZATION RE: REMEDIATION EFFORTS AT SITE "C"; PREPARE FOR CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY; CONFERENCE CALL WITH K. HENNESSY, CITY STAFF AND CONSULTANT RE: SITE "C" CLEAN-UP AND LAWSUIT FILED BY CARES; CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY, DEPARTMENT OF ENVIRONMENTAL PROTECTION, CITY STAFF AND CONSULTANTS, QUALITY ENTERPRISES AND K. HENNESSY RE: ISSUES WITH SITE "C" REMEDIATION AND STATUS OF SITE "A" CLEAN-UP.	3.80	195.00	741.00
04/16/07	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH EPA; WORK SESSION WITH D. JACKSON.	1.90	245.00	465.50
04/18/07	KSH	RECEIVE AND REVIEW EMAILS FROM CLIENT WITH LETTERS FROM SHERIFF AND B. NEYLON; ATTEND CONFERENCE CALL WITH THE CITY; WORK SESSION WITH D. JACKSON.	1.50	245.00	367.50
04/18/07	RDJ	RECEIVE AND REVIEW EMAIL CORRESPONDENCE	1.60	195.00	312.00

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		WITH B. MOSS RE: B. NEYLON'S INVOLVEMENT WITH POLICE INVESTIGATION; LETTER FROM B. MOSS TO U.S. DEPARTMENT OF JUSTICE AND LETTER FROM CITIZENS OF MARCO ISLAND; PHONE CONFERENCE WITH B. MOSS RE: MATTER WITH U.S. DEPARTMENT OF JUSTICE; RECEIVE AND REVIEW LETTER FROM COLLIER COUNTY SHERIFF'S OFFICE TO B. MOSS RE: FBI INVESTIGATING ASBESTOS ISSUES; CONFERENCE CALL WITH K. HENNESSY AND CITY STAFF RE: SAME.			
04/20/07	KSH	REVIEW NEWS ARTICLES; PHONE CONFERENCE WITH CITY OFFICIALS; WORK SESSION WITH D. JACKSON RE: STATUS.	0.70	245.00	171.50
04/23/07	KSH	RECEIVE AND REVIEW EMAIL FROM B. MOSS RE: SUPREME COURT HEARING.	0.20	245.00	49.00
04/25/07	KSH	WORK SESSION WITH D. JACKSON RE: COMPLAINT AND SERVICE; PHONE CONFERENCE WITH MARCO ISLAND.	0.50	245.00	122.50
04/25/07	MDM	STRATEGY SESSION AND EMAIL CORRESPONDENCE WITH D. JACKSON AND K. HENNESSY RE: SERVICE OF COMPLAINT BY CARES.	0.30	195.00	58.50
04/25/07	RDJ	PHONE CONFERENCE WITH B. MOSS RE: CARES LAWSUIT; CONFER WITH K. HENNESSY RE: CARES' FAILURE TO SERVE COMPLAINT; PHONE CONFERENCES WITH COLLIER COUNTY CLERK OF COURT TO CONFIRM COMPLAINT HAS NOT BEEN SERVED.	0.80	195.00	156.00
04/27/07	RDJ	DRAFT NOTICE OF APPEARANCE IN CIRCUIT COURT CASE FILED BY CARES; DRAFT LETTER TO S. GOLD RE: NOTICE OF APPEARANCE AND LACK OF SERVICE OF COMPLAINT ON CITY.	1.00	195.00	195.00
04/30/07	KSH	REVIEW DRAFT NOTICE OF APPEARANCE AND LETTER TO S. GOLD.	0.30	245.00	73.50
04/30/07	RDJ	REVISE AND FINALIZE NOTICE OF APPEARANCE IN CARES CIRCUIT CASE AND LETTER TO S. GOLD RE: SAME.	0.30	195.00	58.50
05/03/07	RDJ	LEGAL RESEARCH RE: ISSUES RELATED TO CARES' COMPLAINT FOR DECLARATORY RELIEF.	1.50	195.00	292.50
05/08/07	RDJ	LEGAL RESEARCH RE: VARIOUS ISSUES RELATED TO CARES' COMPLAINT FOR DECLARATORY RELIEF.	2.20	195.00	429.00
05/14/07	KSH	WORK SESSION WITH D. JACKSON RE: STATUS OF SERVICE OF THE COMPLAINT AND CONTACT WITH EPA AND CONTACT WITH QUALITY'S ATTORNEY.	0.50	245.00	122.50
05/14/07	RDJ	DRAFT LETTER TO B. MOSS AND R. YOVANOVICH RE: SERVICE OF CARES' COMPLAINT; LEGAL RESEARCH RE: VARIOUS ISSUES RELATED TO CARES' COMPLAINT	3.60	195.00	702.00

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		FOR DECLARATORY RELIEF; PHONE CONFERENCES WITH CITY STAFF RE: CLEANUP OF SITE A; PHONE CONFERENCE WITH S. BUNNER, ATTORNEY FOR QUALITY ENTERPRISES, RE: NEW LAWSUIT; DRAFT ANSWER TO COMPLAINT.			
05/16/07	MDM	RECEIVE AND REVIEW CORRESPONDENCE FROM CITY RE: SUMMONS.	0.30	195.00	58.50
05/16/07	KSH	RECEIVE AND REVIEW COMPLAINT SERVED ON CITY; WORK SESSION WITH D. JACKSON RE: RESPONSE; EMAIL FROM D. JACKSON RE: CALL WITH CITY.	1.50	245.00	367.50
05/16/07	RDJ	PHONE CONFERENCES WITH CITY STAFF RE: SERVICE OF CARES' COMPLAINT AND REMEDIATION EFFORTS AT SITE A; RECEIVE AND REVIEW CARES' COMPLAINT FOR DECLARATORY RELIEF SERVED ON CITY; LEGAL RESEARCH RE: ACTIONS FOR DECLARATORY RELIEF.	1.40	195.00	273.00
05/17/07	RDJ	LEGAL RESEARCH RE: DECLARATORY JUDGMENT; REVIEW AND ANALYZE COMPLAINT, SETTLEMENT AGREEMENT, AND CONTRACT WITH QUALITY ENTERPRISES.	2.40	195.00	468.00
05/18/07	RDJ	LEGAL RESEARCH RE: DECLARATORY JUDGMENTS; REVIEW AND ANALYZE COMPLAINT AND RELATED DOCUMENTS; PREPARE ANSWER TO COMPLAINT.	3.10	195.00	604.50
05/21/07	RDJ	LEGAL RESEARCH RE: DECLARATORY JUDGMENT ACTIONS; REVIEW AND ANALYZE COMPLAINT AND RELATED DOCUMENTS; DRAFT ANSWER TO COMPLAINT.	2.70	195.00	526.50
05/22/07	RDJ	LEGAL RESEARCH RE: DECLARATORY JUDGMENTS AND MOTIONS TO DISMISS.	1.80	195.00	351.00
05/24/07	RDJ	LEGAL RESEARCH RE: DECLARATORY JUDGMENT ACTIONS AND MOTIONS TO DISMISS; STRATEGY SESSION WITH K. HENNESSY RE: RESPONSE TO CARES' COMPLAINT FOR DECLARATORY RELIEF; LEGAL RESEARCH RE: FAILURE TO ATTACH EXHIBITS TO COMPLAINT AND VARIOUS ISSUES RELATED TO COMPLAINT.	3.70	195.00	721.50
05/25/07	MDM	RECEIVE AND REVIEW CORRESPONDENCE TO S. GOLD RE: INCOMPLETE FILING AND SERVICE.	0.10	195.00	19.50
05/25/07	RDJ	DRAFT LETTER TO S. GOLD RE: FAILURE TO ATTACH EXHIBITS TO COMPLAINT; LEGAL RESEARCH RE: FAILING TO ATTACH EXHIBITS TO A COMPLAINT, INCONSISTENCIES BETWEEN A COMPLAINT AND ITS EXHIBITS; DRAFT MOTION TO DISMISS COMPLAINT AND CONDUCT LEGAL RESEARCH RE: VARIOUS ISSUES.	3.20	195.00	624.00
05/25/07	KSH	FINALIZE LETTER TO S. GOLD RE: EXHIBITS.	0.20	245.00	49.00

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Date	Atty	Description	Hours	Rate	Amount
05/29/07	RDJ	DRAFT MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: VARIOUS ISSUES RAISED IN MOTION.	2.50	195.00	487.50
06/04/07	KSH	REVIEW AND REVISE MOTION FOR EXTENSION OF TIME TO ANSWER.	0.30	245.00	73.50
06/04/07	RDJ	DRAFT, EDIT, FINALIZE MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT FOR DECLARATORY RELIEF; DRAFT MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF.	4.50	195.00	877.50
06/05/07	RDJ	DRAFT MOTION TO DISMISS COMPLAINT AND LEGAL RESEARCH RE: VARIOUS ISSUES RELATED TO MOTION.	2.60	195.00	507.00
06/06/07	RDJ	DRAFT MOTION TO DISMISS COMPLAINT AND LEGAL RESEARCH RE: ISSUES RAISED IN MOTION.	2.00	195.00	390.00
06/07/07	RDJ	DRAFT MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: RELATED ISSUES.	3.20	195.00	624.00
06/11/07	RDJ	DRAFT MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: ISSUES RELATED TO MOTION.	4.50	195.00	877.50
06/12/07	RDJ	DRAFT MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: VARIOUS ISSUES.	2.90	195.00	565.50
06/13/07	RDJ	LEGAL RESEARCH RE: VARIOUS ISSUES RAISED IN COMPLAINT FOR DECLARATORY RELIEF AND IN MOTION TO DISMISS COMPLAINT; DRAFT MOTION TO DISMISS.	2.70	195.00	526.50
06/14/07	RDJ	LEGAL RESEARCH RE: VARIOUS ISSUES RAISED IN COMPLAINT; DRAFT MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: ISSUES RELATED TO MOTION.	3.90	195.00	760.50
06/15/07	RDJ	LEGAL RESEARCH RE: AFFIRMATIVE DEFENSES, ACTIONS FOR DECLARATORY RELIEF, AND VARIOUS ISSUES RAISED IN MOTION TO DISMISS; DRAFT MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF.	3.70	195.00	721.50
06/18/07	RDJ	DRAFT AND EDIT MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY RELIEF.	2.80	195.00	546.00
06/19/07	RDJ	DRAFT AND EDIT MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY RELIEF; LEGAL RESEARCH RE: VARIOUS ISSUES RELATED TO MOTION TO DISMISS.	5.70	195.00	1,111.50
06/20/07	KSH	PHONE CONFERENCE WITH ATTORNEY M. POPOK'S OFFICE; REVIEW AND REVISE DRAFT MOTION TO DISMISS; PHONE CONFERENCE WITH M. POPOK'S	1.80	245.00	441.00

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		OFFICE RE: MOTION TO DISMISS.			
06/21/07	RDJ	WORK SESSION WITH K. HENNESSY RE: MOTION TO DISMISS AND PENDING LITIGATION IN GENERAL; REVISE MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: ISSUES RAISED IN MOTION.	3.60	195.00	702.00
06/22/07	RDJ	REVISE MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: ISSUES RELATED TO MOTION.	4.70	195.00	916.50
06/25/07	RDJ	REVISE MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: ISSUES RELATED TO MOTION; PHONE CONFERENCE WITH AND EMAIL CORRESPONDENCE WITH M. POPOK (WEISS SEROTA) RE: REVISIONS TO MOTION TO DISMISS AND VARIOUS OTHER ISSUES.	4.40	195.00	858.00
06/26/07	RDJ	DRAFT AND REVISE MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: VARIOUS ISSUES RELATED TO MOTION.	4.50	195.00	877.50
06/27/07	MAM	WORK SESSION WITH J. SANTOS RE: CALENDARING; RESEARCH CONCERNING FLORIDA RULES OF CIVIL PROCEDURE 1.420 AND 1.090.	0.40	100.00	40.00
06/27/07	RDJ	WORK SESSION WITH T. LEWIS RE: MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF; DRAFT, EDIT, FINALIZE MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND LEGAL RESEARCH RE: ISSUES RELATED TO MOTION.	5.30	195.00	1,033.50
06/27/07	TEL	REVIEW AND REVISE MOTION TO DISMISS; CONFERENCE WITH D. JACKSON.	1.00	245.00	245.00
06/28/07	RDJ	DRAFT LETTER TO CLIENT RE: MOTION TO DISMISS; ORGANIZE RESEARCH AND OTHER DOCUMENTS PERTAINING TO MOTION TO DISMISS.	1.00	195.00	195.00
06/29/07	RDJ	EMAIL CORRESPONDENCE WITH M. POPOK RE: MOTION TO DISMISS; RECEIVE AND REVIEW QUALITY ENTERPRISES' MOTION TO DISMISS; FOLLOW UP PHONE CONFERENCE WITH QUALITY'S ATTORNEY RE: SCHEDULING OF HEARING.	0.70	195.00	136.50
07/12/07	RDJ	EMAIL CORRESPONDENCE WITH M. POPOK RE: HEARING FOR MOTION TO DISMISS AND PHONE CONFERENCE WITH QUALITY'S ATTORNEY'S OFFICE RE: SAME.	0.30	195.00	58.50
07/18/07	RDJ	EMAIL CORRESPONDENCE AND PHONE CONFERENCE WITH S. BUNNER, ATTORNEY FOR QUALITY ENTERPRISES, RE: HEARING FOR MOTION TO DISMISS.	0.30	195.00	58.50
07/20/07	MDM	SEVERAL EMAIL CORRESPONDENCE WITH D. JACKSON RE: AVAILABILITY TO ATTEND HEARING ON	0.70	195.00	136.50

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		MOTION TO DISMISS, COORDINATION WITH CO-COUNSEL AND COUNSEL FOR QUALITY; REVIEW MOTION TO DISMISS FILED BY CITY AND QUALITY.			
07/25/07	RDJ	REVIEW AND REVISE NOTICE OF HEARING FOR MOTIONS TO DISMISS AND EMAIL CORRESPONDENCE WITH QUALITY'S ATTORNEY RE: SAME.	0.30	195.00	58.50
10/29/07	MDM	SEVERAL EMAIL CORRESPONDENCE AND STRATEGY SESSION WITH D. JACKSON RE: PLAINTIFF'S REQUEST TO RESCHEDULE HEARING ON MOTION TO PRODUCE.	0.20	195.00	39.00
10/29/07	RDJ	PHONE CONFERENCE WITH S. GOLD'S OFFICE RE: POSTPONEMENT OF HEARING ON MOTION TO DISMISS AND LEFT VOICE MAIL WITH S. BUNNER, COUNSEL FOR QUALITY ENTERPRISES, RE: SAME; ORGANIZE, FINALIZE AND LEGAL RESEARCH RE: MOTION TO DISMISS.	0.90	195.00	175.50
10/30/07	RDJ	PHONE CONFERENCE WITH CARES ATTORNEY'S OFFICE RE: POSSIBLE DATES FOR RESCHEDULING HEARING ON MOTION TO DISMISS.	0.20	195.00	39.00
10/31/07	RDJ	EMAIL CORRESPONDENCE AND PHONE CONFERENCES WITH COUNSEL FOR QUALITY ENTERPRISES, D. ABBOTT (ATTORNEY FOR CITY OF MARCO ISLAND) AND OFFICE OF CARES RE: RESCHEDULING OF HEARING ON MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF AND FOLLOW UP; PHONE CONFERENCE WITH B. MOSS RE: STATUS.	1.00	195.00	195.00
10/31/07	KSH	OFFICE CONFERENCE WITH D. JACKSON RE: POSTPONEMENT REQUEST, CITY'S POSITION AND NEED FOR REASONABLE ALTERNATIVE DATES FOR HEARING.	0.30	245.00	73.50
11/02/07	KSH	OFFICE CONFERENCE WITH D. JACKSON RE: STATUS OF HEARING.	0.20	245.00	49.00
11/02/07	RDJ	REVIEW AND ANALYZE CARES' MOTIONS FOR CONTINUANCE OF HEARING ON MOTIONS TO DISMISS AND QUALITY ENTERPRISES' RESPONSE IN OPPOSITION; RECEIVE AND REVIEW CORRESPONDENCE FROM COUNSEL FOR QUALITY ENTERPRISES RE: RESCHEDULING OF HEARING ON MOTIONS TO DISMISS AND FOLLOW UP.	0.40	195.00	78.00
11/05/07	MDM	SEVERAL EMAIL CORRESPONDENCE WITH D. JACKSON AND K. HENNESSY RE: CONTINUATION AND RESCHEDULING OF HEARING ON MOTION TO DISMISS; CONTACT WITH JUDGE'S ASSISTANT RE: SAME.	0.40	195.00	78.00
11/05/07	RDJ	PHONE CONFERENCES WITH COUNSEL FOR QUALITY ENTERPRISES RE: RESCHEDULING OF HEARING ON	0.50	195.00	97.50

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		MOTIONS TO DISMISS AND FOLLOW UP; RECEIVE AND REVIEW NOTICE OF HEARING RE: MOTIONS TO DISMISS.			
11/05/07	KSH	RECEIVE AND REVIEW OPPOSITION TO MOTION FOR CONTINUANCE; OFFICE CONFERENCE WITH D. JACKSON RE: CANCELLATION OF HEARING.	0.30	245.00	73.50
11/06/07	KSH	RECEIVE AND REVIEW NOTICE OF HEARING.	0.20	245.00	49.00
11/07/07	RDJ	PREPARE FOR HEARING ON MOTION TO DISMISS AND REVIEW AND ORGANIZE DOCUMENTS RE: SAME.	1.80	195.00	351.00
11/08/07	RDJ	PREPARE FOR HEARING ON MOTION TO DISMISS.	1.00	195.00	195.00
11/09/07	KSH	RECEIVE AND REVIEW ORDER RE: HEARING.	0.20	245.00	49.00
11/09/07	RDJ	RECEIVE AND REVIEW ORDER RE: HEARING ON MOTION TO DISMISS AND FOLLOW UP.	0.20	195.00	39.00
11/14/07	RDJ	LEGAL RESEARCH RE: VARIOUS ISSUES AND PREPARE FOR HEARING ON MOTION TO DISMISS.	2.60	195.00	507.00
11/15/07	RDJ	PREPARE FOR HEARING ON MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY RELIEF.	1.00	195.00	195.00
11/19/07	RDJ	PREPARE FOR HEARING ON MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY RELIEF.	1.40	195.00	273.00
11/20/07	RDJ	PREPARE FOR HEARING ON MOTION TO DISMISS COMPLAINT FOR DECLARATORY RELIEF.	1.20	195.00	234.00
11/20/07	KSH	RECEIVE AND REVIEW HEARING BINDER ON MOTION TO DISMISS COMPLAINT; PHONE CONFERENCE WITH R. JOEL; WORK SESSION WITH D. JACKSON.	1.20	245.00	294.00
11/21/07	RDJ	PREPARE FOR HEARING ON MOTION TO DISMISS COMPLAINT.	2.00	195.00	390.00
11/26/07	RDJ	PREPARE FOR HEARING ON MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY JUDGMENT; REVIEW FILE; LEGAL RESEARCH RE: VARIOUS ISSUES.	5.00	195.00	975.00
11/27/07	KSH	TRAVEL TO NAPLES; PREPARE FOR AND ATTEND HEARING ON MOTION TO DISMISS.	5.50	245.00	1,347.50
11/27/07	RDJ	TRAVEL TO NAPLES; PREPARE FOR AND ATTEND HEARING ON MOTION TO DISMISS CARES' COMPLAINT FOR DECLARATORY JUDGMENT AND FOLLOW UP.	5.50	195.00	1,072.50
11/28/07	KSH	PHONE CONFERENCE WITH MARCO ISLAND TIMES; WORK SESSION WITH D. JACKSON.	0.20	245.00	49.00
12/13/07	KSH	RECEIVE AND REVIEW EMAIL FROM GOLD LAW FIRM.	0.20	245.00	49.00
12/17/07	KSH	RECEIVE AND REVIEW EMAIL FROM S. GOLD'S OFFICE.	0.20	245.00	49.00
12/21/07	RDJ	RECEIVE AND REVIEW CARES' MOTION FOR ENLARGEMENT OF TIME TO FILE AMENDED COMPLAINT AND FOLLOW UP.	0.30	195.00	58.50
12/21/07	KSH	RECEIVE AND REVIEW MOTION FOR ENLARGEMENT OF TIME; WORK SESSION WITH D. JACKSON RE: SAME.	0.30	245.00	73.50

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12/26/07	RDJ	CONFER WITH K. HENNESSY RE: CARES' MOTION FOR ENLARGEMENT OF TIME TO FILE AMENDED COMPLAINT AND FOLLOW UP PHONE CONFERENCES WITH T. SHOEMAKER AND S. BUNNER (COUNSEL FOR QUALITY ENTERPRISES) RE: SAME.	0.70	195.00	136.50
12/27/07	KSH	RECEIVE AND REVIEW EMAIL FROM R. JOEL RE: DEMAND FOR PAYMENT; RESPOND TO SAME.	0.20	245.00	49.00
12/28/07	KSH	RECEIVE AND REVIEW EMAILS FROM D. JACKSON AND D. ABBOTT RE: MOTION FOR ENLARGEMENT OF TIME; RESPOND TO SAME; OFFICE CONFERENCE WITH D. JACKSON; RECEIVE AND REVIEW EMAIL TO D. ABBOTT.	0.50	245.00	122.50
12/28/07	RDJ	EMAIL CORRESPONDENCE WITH D. ABBOTT (CITY ATTORNEY) RE: CARES' MOTION FOR ENLARGEMENT OF TIME; STRATEGY SESSION WITH K. HENNESSY; LEGAL RESEARCH RE: MOTIONS FOR ENLARGEMENT OF TIME AND AMENDING COMPLAINTS.	1.30	195.00	253.50
12/31/07	KSH	RECEIVE AND REVIEW EMAIL FROM R. JOEL RE: QUALITY; RESPOND TO SAME.	0.20	245.00	49.00
01/07/08	RDJ	REVIEW AND ANALYZE EMAILS BETWEEN CITY AND QUALITY ENTERPRISES RE: CHANGE ORDER DISPUTE AND PAYMENTS TO COLLIER COUNTY; CONFERENCE CALL WITH K. HENNESSY, R. JOEL, AND T. SHOEMAKER RE: SAME; REVIEW AND ANALYZE CORRESPONDENCE FROM COLLIER COUNTY, MEMORANDUM OF UNDERSTANDING BETWEEN COLLIER COUNTY AND CITY RE: DISPOSAL OF MATERIALS; DRAFT LETTER TO COLLIER COUNTY RE: RESOLVING ISSUE OF PAYMENTS FOR DISPOSAL OF MATERIAL.	2.20	195.00	429.00
01/07/08	KSH	RECEIVE AND REVIEW EMAILS CONCERNING ISSUES WITH QUALITY FROM R. JOEL; RESPOND TO SAME; ATTEND CONFERENCE CALL RE: SAME.	1.00	245.00	245.00
01/08/08	RDJ	CONFERENCE CALL WITH R. JOEL AND A. GABRIEL RE: RESPONSE TO COLLIER COUNTY AND QUALITY ENTERPRISES FOR LANDFILL/PAYMENT ISSUES; DRAFT LETTER TO COLLIER COUNTY.	0.70	195.00	136.50
01/09/08	RDJ	REVISE AND FINALIZE LETTER TO COLLIER COUNTY AND FOLLOW UP; EMAIL CORRESPONDENCE WITH COUNSEL FOR QUALITY ENTERPRISES RE: LANDFILL PAYMENT ISSUE; DRAFT LETTER TO QUALITY'S ATTORNEY RE: SAME; PHONE CONFERENCE WITH CITY STAFF RE: BALANCE DUE TO LANDFILL.	1.90	195.00	370.50
01/09/08	KSH	REVIEW AND REVISE LETTER TO COUNTY; RECEIVE AND REVIEW EMAIL TO QUALITY ATTORNEYS; WORK	1.10	245.00	269.50

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		SESSION WITH D. JACKSON; REVIEW AND REVISE REDRAFT OF LETTER TO COUNTY AND QUALITY; RECEIVE AND REVIEW EMAIL FROM P. GENZLER.			
01/10/08	RDJ	DRAFT, EDIT AND FINALIZE LETTER TO ATTORNEYS FOR QUALITY ENTERPRISES; EMAIL CORRESPONDENCE WITH CITY STAFF AND CITY ATTORNEY RE: LETTERS TO COLLIER COUNTY AND QUALITY ENTERPRISES; RECEIVE AND REVIEW EMAIL FROM P. GENZLER AND FOLLOW UP.	1.60	195.00	312.00
01/10/08	KSH	RECEIVE AND REVIEW DRAFT LETTER; RECEIVE AND REVIEW EMAIL FROM A. GABRIEL; RECEIVE AND REVIEW EMAIL FROM T. SHOEMAKER; RECEIVE AND REVIEW RESPONSE FROM D. JACKSON.	0.50	245.00	122.50
01/15/08	RDJ	PHONE CONFERENCE WITH R. JOEL RE: LANDFILL ISSUE AND FOLLOW UP.	0.20	195.00	39.00
01/15/08	KSH	WORK SESSION WITH D. JACKSON RE: CONTACT WITH R. JOEL RE: QUALITY ENTERPRISES LETTER.	0.30	245.00	73.50
01/16/08	RDJ	EMAIL CORRESPONDENCE WITH P. GENZLER RE: COLLIER COUNTY LANDFILL ISSUE.	0.20	195.00	39.00
01/16/08	KSH	RECEIVE AND REVIEW EMAIL FROM D. JACKSON TO P. GENZLER; RECEIVE AND REVIEW RESPONSE FROM P. GENTZLER.	0.30	245.00	73.50
01/22/08	RDJ	PHONE CONFERENCE WITH R. JOEL AND FOLLOW UP EMAIL CORRESPONDENCE WITH ATTORNEYS FOR QUALITY ENTERPRISES RE: COLLIER COUNTY LANDFILL ISSUE; FOLLOW UP PHONE CONFERENCE WITH R. JOEL.	0.40	195.00	78.00
01/22/08	KSH	RECEIVE AND REVIEW EMAIL FROM P. GENZLER; RECEIVE AND REVIEW EMAILS FROM D. JACKSON; RECEIVE AND REVIEW EMAIL FROM N. OWENSTEIN.	0.90	245.00	220.50
01/28/08	KSH	RECEIVE AND REVIEW EMAILS FROM T. BEESON WITH RESULTS OF TESTING.	0.30	245.00	73.50
01/30/08	KSH	WORK SESSION WITH D. JACKSON RE: STATUS OF COMPLAINT; RECEIVE AND REVIEW ARTICLE ON ELECTION.	0.30	245.00	73.50
01/31/08	KSH	WORK SESSION WITH D. JACKSON RE: OVERDUE AMENDED COMPLAINT AND STRATEGY.	0.50	245.00	122.50
02/01/08	KSH	REVIEW NOTICE OF DISMISSAL; RECEIVE AND REVIEW EMAILS FROM S. BUNNER.	0.30	245.00	73.50
02/04/08	RDJ	REVIEW NOTICE OF VOLUNTARY DISMISSAL FROM CARES AND FOLLOW UP.	0.20	195.00	39.00
02/13/08	KSH	PHONE CONFERENCE WITH R. JOEL RE: INQUIRY FROM NEWSPAPER; WORK SESSION WITH D. JACKSON.	0.30	245.00	73.50

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02/22/08	RDJ	REVIEW AND REVISE AUDIT LETTER; REVIEW FILE RE: CARES LITIGATION AND DRAFT SUMMARY FOR AUDIT LETTER.	0.80	195.00	156.00
03/19/09	RDJ	RECEIVE AND REVIEW LETTER FROM ENVIRONMENTAL PROTECTION AGENCY RE: REQUEST FOR INFORMATION; CONFERENCE CALL WITH CLIENT AND K. HENNESSY; REVIEW FILE RE: PREVIOUSLY PROVIDED INFORMATION; LEFT VOICE MAILS FOR ENVIRONMENTAL PROTECTION AGENCY STAFF AND ATTORNEY.	2.20	200.00	440.00
03/19/09	KSH	RECEIVE AND REVIEW EMAIL WITH ENVIRONMENTAL PROTECTION AGENCY LETTER FROM R. JOEL; TELEPHONE CONFERENCE WITH R. JOEL AND D. JACKSON; WORK SESSION WITH D. JACKSON.	1.00	250.00	250.00
03/23/09	RDJ	TELEPHONE CONFERENCE WITH ENVIRONMENTAL PROTECTION AGENCY STAFF RE: REQUEST FOR INFORMATION AND CONFER WITH K. HENNESSY RE: SAME TO PREPARE FOR CONFERENCE CALL WITH CLIENT AND QUALITY ENTERPRISES.	0.60	200.00	120.00
03/23/09	KSH	SCHEDULE TELEPHONE CALL; PREPARE FOR AND ATTEND CONFERENCE CALL; RECEIVE AND REVIEW EMAIL FROM P. GENZLER; WORK SESSION WITH D. JACKSON.	1.90	250.00	475.00
03/26/09	RDJ	CONFER WITH K. HENNESSY RE: LETTER TO ENVIRONMENTAL PROTECTION AGENCY; EMAIL CORRESPONDENCE WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: COMMUNICATIONS WITH ENVIRONMENTAL PROTECTION AGENCY; DRAFT, EDIT AND FINALIZE LETTER TO ENVIRONMENTAL PROTECTION AGENCY RE: CONSOLIDATED RESPONSE WITH QUALITY ENTERPRISES AND REQUEST FOR ADDITIONAL TIME RESPOND TO REQUEST FOR INFORMATION.	1.00	200.00	200.00
03/26/09	KSH	WORK SESSION WITH D. JACKSON.	0.30	250.00	75.00
03/26/09	RDJ	PREPARE CORRESPONDENCE TO P. MCILVAINE AND R. CAPLAN RE: EXTENSION OF TIME TO RESPOND TO DEPARTMENT OF ENVIRONMENTAL PROTECTION REQUEST FOR INFORMATION.	0.50	200.00	100.00
04/01/09	KSH	RECEIVE AND REVIEW EMAIL FROM P. GENZLER RE: EXTENSION; RESPOND TO SAME.	0.20	250.00	50.00
04/02/09	KSH	RECEIVE AND REVIEW EMAIL FROM R. CAPLAN RE: EXTENSION; WORK SESSION WITH D. JACKSON RE: SAME.	0.20	250.00	50.00
04/02/09	RDJ	WORK SESSION WITH K. HENNESSY RE: EPA MATTER.	0.20	200.00	40.00
04/07/09	KSH	RECEIVE AND REVIEW EMAIL FROM P. GENZLER;	0.50	250.00	125.00

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		WORK SESSION WITH D. JACKSON.			
04/07/09	RDJ	WORK SESSION WITH K. HENNESSY RE: RESPONSE TO EPA LETTER.	0.20	200.00	40.00
04/08/09	RDJ	REVIEW LETTER FROM ENVIRONMENTAL PROTECTION AGENCY AUTHORIZING EXTENSION OF TIME TO RESPOND TO INFORMATION REQUEST LETTER AND FOLLOW UP.	0.30	200.00	60.00
04/08/09	KSH	RECEIVE AND REVIEW EMAIL RE: REQUEST FOR INFORMATION FROM ENVIRONMENTAL PROTECTION AGENCY.	0.20	250.00	50.00
04/14/09	RDJ	REVIEW AND REVISE LETTER TO ENVIRONMENTAL PROTECTION AGENCY RE: REQUESTED INFORMATION; REVIEW AND ANALYZE SUPPORTING DOCUMENTATION PREPARED BY QUALITY ENTERPRISES AND FOLLOW UP WITH P. GENZLER RE: SAME; CONFER WITH K. HENNESSY RE: STATUS.	1.10	200.00	220.00
04/14/09	KSH	TELEPHONE CONFERENCE WITH R. JOEL; RECEIVE AND REVIEW EMAIL FROM P. GENZLER WITH ENVIRONMENTAL PROTECTION AGENCY RESPONSE; OFFICE CONFERENCE WITH D. JACKSON.	1.00	250.00	250.00
04/15/09	RDJ	REVIEW AND REVISE LETTER TO ENVIRONMENTAL PROTECTION AGENCY RE: REQUESTED INFORMATION; CONFER WITH K. HENNESSY RE: SAME.	0.50	200.00	100.00
04/15/09	KSH	EMAIL R. JOEL; RECEIVE AND REVIEW DRAFT RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY.	0.30	250.00	75.00
04/16/09	RDJ	TELEPHONE CONFERENCE WITH R. JOEL RE: DOCUMENTS TO BE PROVIDED TO ENVIRONMENTAL PROTECTION AGENCY; FINALIZE REVISIONS TO LETTER TO ENVIRONMENTAL PROTECTION AGENCY AND TRANSMIT SAME TO P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES.	0.50	200.00	100.00
04/16/09	KSH	RECEIVE AND REVIEW EMAIL FROM D. JACKSON TO P. GENZLER WITH REVISIONS.	0.50	250.00	125.00
04/17/09	RDJ	REVIEW AND ANALYZE DOCUMENTS RE: SITE "C" WASTE DISPOSAL; TELEPHONE CONFERENCE WITH AND EMAIL CORRESPONDENCE WITH P. GENZLER RE: SITE "C" DOCUMENTS AND STATUS OF SUBMITTAL TO ENVIRONMENTAL PROTECTION AGENCY.	2.80	200.00	560.00
04/20/09	RDJ	WORK SESSION WITH K. HENNESSY; FOLLOW UP WITH P. GENZLER RE: STATUS OF SUBMITTAL TO ENVIRONMENTAL PROTECTION AGENCY; EMAIL CORRESPONDENCE WITH L. GAUDIO, QUALITY ENTERPRISES, RE: SAME.	0.30	200.00	60.00
04/20/09	KSH	RECEIVE AND REVIEW EMAIL FROM L. GAUDIO RE:	0.20	250.00	50.00

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		SUBMISSIONS TO ENVIRONMENTAL PROTECTION AGENCY; WORK SESSION WITH D. JACKSON.			
04/21/09	KSH	RECEIVE AND REVIEW EMAIL FROM P. GENZLER; WORK SESSION WITH D. JACKSON.	0.20	250.00	50.00
04/21/09	RDJ	WORK SESSION WITH K. HENNESSY RE: EPA MATTER.	0.20	200.00	40.00
04/23/09	RDJ	EMAIL CORRESPONDENCE WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES, RE: COPIES OF SUBMITTAL TO ENVIRONMENTAL PROTECTION AGENCY.	0.20	200.00	40.00
04/27/09	RDJ	RECEIVE AND REVIEW FINAL SUBMITTAL TO ENVIRONMENTAL PROTECTION AGENCY IN RESPONSE TO REQUEST FOR INFORMATION JOINTLY MADE ON BEHALF OF CITY OF MARCO ISLAND AND QUALITY ENTERPRISES.	1.70	200.00	340.00
08/13/09	RDJ	RECEIVE AND REVIEW REQUESTS FOR INFORMATION FROM ENVIRONMENTAL PROTECTION AGENCY SENT TO CLIENT AND QUALITY ENTERPRISES; TELEPHONE CONFERENCE WITH R. JOEL RE: SAME; EMAIL CORRESPONDENCE AND TELEPHONE CONFERENCE WITH P. GENZLER, ATTORNEY FOR QUALITY ENTERPRISES; CONFER WITH K. HENNESSY; REVIEW FILE; FOLLOW UP EMAIL CORRESPONDENCE WITH R. JOEL RE: RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY'S FIRST REQUEST FOR INFORMATION.	1.80	200.00	360.00
08/14/09	RDJ	REVIEW FILE RE: RESPONSE TO FIRST REQUEST FOR INFORMATION FROM ENVIRONMENTAL PROTECTION AGENCY; REVIEW AND ANALYZE ENVIRONMENTAL PROTECTION AGENCY'S SECOND REQUEST FOR INFORMATION; EMAIL CORRESPONDENCE WITH CLIENT AND P. GENZLER RE: SCHEDULING CONFERENCE CALL TO DISCUSS RESPONSE; RECEIVE AND REVIEW VARIOUS DOCUMENTS RESPONSIVE TO SECOND REQUEST FOR INFORMATION.	2.00	200.00	400.00
08/17/09	RDJ	REVIEW AND ANALYZE DOCUMENTS TO PREPARE RESPONSE TO REQUEST FOR INFORMATION FROM ENVIRONMENTAL PROTECTION AGENCY. □	0.80	200.00	160.00
08/18/09	RDJ	RECEIVE AND REVIEW DOCUMENTS RESPONSIVE TO ENVIRONMENTAL PROTECTION AGENCY'S REQUEST FOR INFORMATION.	0.30	200.00	60.00
08/19/09	RDJ	PREPARE FOR AND PARTICIPATE ON CONFERENCE CALL WITH K. HENNESSY, CLIENT, AND QUALITY ENTERPRISES RE: RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY'S REQUEST FOR INFORMATION AND FOLLOW UP; EMAIL CORRESPONDENCE AND	2.20	200.00	440.00

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Date	Atty	Description	Hours	Rate	Amount
		TELEPHONE CONFERENCE WITH P. GENZLER RE: FOLLOW UP TELEPHONE CONFERENCE WITH ENVIRONMENTAL PROTECTION AGENCY ATTORNEY; ORGANIZE DOCUMENTS FOR RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY.			
08/19/09	KSH	PREPARE FOR AND ATTEND CONFERENCE CALL WITH CLIENT.	0.90	250.00	225.00
08/20/09	RDJ	REVIEW AND ANALYZE ADDENDUM TO SOUTH COLLIER BOULEVARD BID DOCUMENTS; SEVERAL EMAIL CORRESPONDENCE WITH P. GENZLER AND R. CAPLAN, ATTORNEY FOR ENVIRONMENTAL PROTECTION AGENCY.	1.00	200.00	200.00
08/21/09	RDJ	STRATEGY SESSION WITH K. HENNESSY; CONFERENCE CALL WITH R. CAPLAN, P. MCILVANE, ENVIRONMENTAL PROTECTION AGENCY, P. GENZLER, QUALITY ENTERPRISES, AND K. HENNESSY RE: ENVIRONMENTAL PROTECTION AGENCY'S SECOND REQUEST FOR INFORMATION AND SEVERAL EMAIL CORRESPONDENCE WITH PARTIES RE: SAME; FOLLOW UP CONFERENCE CALL WITH K. HENNESSY AND P. GENZLER; FOLLOW UP EMAIL CORRESPONDENCE WITH P. GENZLER RE: RESPONSE TO SPECIFIC QUESTIONS FROM ENVIRONMENTAL PROTECTION AGENCY; REVIEW AND ANALYZE, ORGANIZE DOCUMENTS FOR RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY.	2.50	200.00	500.00
08/21/09	KSH	RECEIVE AND REVIEW EMAILS FROM R. CAPLAN AND P. GENZLER (SEVERAL); PREPARE FOR AND ATTEND CONFERENCE CALL WITH ENVIRONMENTAL PROTECTION AGENCY ATTORNEY; TELEPHONE CONFERENCE WITH D. JACKSON AND P. GENZLER RE: RESPONSE TO INQUIRY; PHONE CONFERENCE WITH D. JACKSON RE: TASKS.	2.10	250.00	525.00
08/24/09	RDJ	CONFERENCE CALL WITH R. JOEL AND T. PINTER RE: RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY'S SECOND REQUEST FOR INFORMATION; REVIEW, ANALYZE AND ORGANIZE DOCUMENTS TO PREPARE RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY.	1.50	200.00	300.00
08/25/09	RDJ	REVIEW AND ANALYZE VARIOUS DOCUMENTS AND PREPARE RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY'S SECOND REQUEST FOR INFORMATION.	1.20	200.00	240.00
08/28/09	RDJ	REVISE RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY'S SECOND REQUEST FOR INFORMATION; SEVERAL EMAIL CORRESPONDENCE WITH P.	1.10	200.00	220.00

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Date	Atty	Description	Hours	Rate	Amount
		GENZLER (QUALITY ENTERPRISES) AND R. CAPLAN (ENVIRONMENTAL PROTECTION AGENCY) RE: REQUEST FOR EXTENSION OF TIME AND FOLLOW UP CONFERENCE CALL.			
08/28/09	KSH	RECEIVE AND REVIEW EMAILS FROM P. GENZLER (SEVERAL); RECEIVE AND REVIEW EMAILS FROM D. JACKSON (SEVERAL); RECEIVE AND REVIEW EMAIL FROM R. CAPLAN.	0.80	250.00	200.00
Total Fees			1,042.30		194,300.00

Disbursements

Date	Description	Amount
	COST SURCHARGE	6,783.15
	COMPUTER RESEARCH	757.29
05/19/06	TRAVEL TO ATTEND SHADE MEETING IN MARCO ISLAND ON 5/1/06 ; R. DAVID JACKSON	145.52
05/19/06	MILEAGE CHARGES; TRAVEL TO ATTEND MEETING WITH DEP AND RULE 26 MEETING WITH COUNSEL IN MARCO ISLAND ON 5/3/06 ; MAGGIE D. MOONEY	84.55
07/26/06	COPY CHARGES; COPY CHARGES	128.01
07/31/06	TRAVEL TO ATTEND DOCUMENT REVIEW AND MEETING WITH CITY STAFF IN MARCO ISLAND ON 5/31/06 ; R. DAVID JACKSON	132.41
09/29/06	MEALS WHILE ATTENDING DEPOSITONS IN MARCO ISLAND ON 9/27/06-9/28/06 ; R. DAVID JACKSON	128.98
09/29/06	TRAVEL TO ATTEND DEPOSITION IN MARCO ISLAND ON 9/27/06-9/29/06 ; MAGGIE D. MOONEY	1,021.11
10/19/06	DEPOSITION; APPEARANCE FEE AND TRANSCRIPT FOR DEPOSITION OF E. FOSTER TAKEN ON 9/29/06 ; COLLIER COURT REPORTING, INC.	745.80
10/20/06	MILEAGE CHARGES; TRAVEL TO ATTEND MEDIATION IN NAPLES ON 10/4/06 ; R. DAVID JACKSON	105.91
10/31/06	DEPOSITION; TRANSCRIPT OF DEPOSITION OF W. UTSLER TAKEN ON 9/28/06 ; COLLIER COURT REPORTING, INC.	353.35
12/19/06	TELEPHONE CHARGES; FOR TELEPHONE CONFERENCE ON 11/21/06	30.75
03/22/07	DEPOSITION; APPEARANCE FEE AND COPY OF TRANSCRIPT FOR DEPOSITION OF B. MOSS ON 9/28/06 ; COLLIER COURT REPORTING, INC.	163.55
12/07/07	TELEPHONE CHARGES; TELEPHONE CONFERENCING	12.48
12/10/07	TRAVEL TO ATTEND HEARING IN COLLIER COUNTY ON 11/27/07 ; KEVIN HENNESSY	66.75
01/10/08	MILEAGE CHARGES; MILEAGE TO ATTEND MEETING WITH CLIENT IN MARCO ISLAND ON 1/9/08 ; R. DAVID JACKSON	134.33

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Date	Description	Amount
Total Disbursements		10,793.94
