

STATE OF MICHIGAN  
CIRCUIT COURT FOR THE COUNTY OF ALLEGAN

**BLANCHE HUDSON and  
PAT FOSTER,**  
**Plaintiffs,**

v

File No. 13-52422-NZ

**JOHN C. KLEUESSENDORF and  
JOHN T. BENSON,**  
**Defendants.**

**Hon. Kevin Cronin  
Circuit Court Judge**

\_\_\_\_\_/

Blanche Hudson and Pat Foster  
In Pro Per Plaintiff  
6079 Mallard Drive  
Fennville, MI 49408  
(269) 561-6268

\_\_\_\_\_/

Tyren R. Cudney (P46638)  
Lennon, Miller, O'Connor &  
Bartosiewicz, PLC  
Attorneys for Defendants  
151 South Rose Street, Suite 900  
Kalamazoo, MI 49007  
(269) 381-8844

AFFIDAVIT OF TYREN R. CUDNEY

Tyren R. Cudney, being sworn, states:

1. I am an attorney at law, licensed to practice in the State of Michigan.
2. I can testify to the matters contained in this affidavit if I am called to do so.
3. In connection with this case, I was retained to provide legal services on behalf of Defendants John C. Kleuessendorf and John T. Benson.
4. I, together with other members of my firm, expended significant effort and time (in excess of 400 hours) on behalf of my clients.
5. The services for which fees have been charged were actually performed.

<u>Date</u>	<u>Attorney # / Hours / Rate</u>	<u>Entry #</u>	<u>Explanation</u>	<u>Fees</u>
Oct 28/2013	Lawyer: 215 1.00 Hrs X 125.00	483838	Telephone conference with clients regarding Complaint and defenses.	\$ 125.00
Oct 31/2013	Lawyer: 215 6.80 Hrs X 125.00	483610	Meeting with clients in Fennville to review documents and inspect scene.	\$ 850.00
Nov 1/2013	Lawyer: 215 1.30 Hrs X 125.00	489069	Prepare and draft Answer to Complaint.	\$ 162.50
Nov 1/2013	Lawyer: 215 0.60 Hrs X 125.00	489070	Prepare and draft Affirmative Defenses.	\$ 75.00
Nov 1/2013	Lawyer: 215 0.20 Hrs X 125.00	489071	Prepare and draft Appearance.	\$ 25.00
Nov 1/2013	Lawyer: 215 0.30 Hrs X 125.00	489072	Telephone conference with client representative regarding Jury or not.	\$ 37.50
Nov 6/2013	Lawyer: 215 0.80 Hrs X 125.00	489021	Edit and revise Answer to Complaint.	\$ 100.00
Nov 6/2013	Lawyer: 215 0.30 Hrs X 125.00	489022	Email to clients regarding Jurysvs. Non-Jury.	\$ 37.50
Nov 8/2013	Lawyer: 215 0.30 Hrs X 125.00	489057	Email from client regarding Jury.	\$ 37.50
Nov 8/2013	Lawyer: 215 0.40 Hrs X 125.00	489058	Email from client representative regarding Jury.	\$ 50.00
Nov 8/2013	Lawyer: 215 0.40 Hrs X 125.00	489059	Telephone conference with clients regarding request for non-jury trial.	\$ 50.00
Nov 8/2013	Lawyer: 215 0.30 Hrs X 125.00	489060	Telephone conference with client representative regarding Plaintiff and non-jury.	\$ 37.50
Nov 8/2013	Lawyer: 215 0.30 Hrs X 125.00	489062	Email from clients with records for non-jury trial.	\$ 37.50
Nov 8/2013	Lawyer: 215 0.20 Hrs X 125.00	489063	Email to client representative with recommendations.	\$ 25.00
Nov 11/2013	Lawyer: 215 0.20 Hrs X 125.00	488935	Telephone conference with client regarding need for Sheriff at survey.	\$ 25.00
Nov 12/2013	Lawyer: 215 0.30 Hrs X 125.00	488534	Receipt and review of documents from clients.	\$ 37.50
Nov 18/2013	Lawyer: 215 0.10 Hrs X 125.00	488378	Telephone conference with client regarding responsive pleadings.	\$ 12.50
Nov 26/2013	Lawyer: 215 0.40 Hrs X 125.00	488784	Telephone conference with clients regarding PPO hearing and transcript.	\$ 50.00
Dec 4/2013	Lawyer: 215 0.10 Hrs X 125.00	493101	Telephone conference with client representative regarding reservation of rights letter.	\$ 12.50
Dec 4/2013	Lawyer: 215 0.30 Hrs X 125.00	493102	Telephone conference with clients regarding reservation of rights letter.	\$ 37.50
Dec 10/2013	Lawyer: 215 0.40 Hrs X 125.00	493059	Telephone conference with clients regarding hearing on personal protection order.	\$ 50.00
Dec 17/2013	Lawyer: 215 0.40 Hrs X 125.00	493404	Telephone conference from clients regarding PPO against Plaintiffs.	\$ 50.00
Dec 20/2013	Lawyer: 215 0.30 Hrs X 125.00	492982	Review Scheduling Order.	\$ 37.50
Dec 20/2013	Lawyer: 215 0.10 Hrs X 125.00	492983	Email client representative regarding Scheduling Order dates.	\$ 12.50
Dec 20/2013	Lawyer: 215 0.20 Hrs X 125.00	493311	Receipt and review of Reservation of Rights letter.	\$ 25.00
Dec 20/2013	Lawyer: 215 0.30 Hrs X 125.00	493312	Telephone conference with clients regarding receipt of Reservation of Rights letter.	\$ 37.50
Dec 20/2013	Lawyer: 215 0.20 Hrs X 125.00	493313	Review Pretrial Order regarding Interrogatory limit.	\$ 25.00
Dec 20/2013	Lawyer: 215 0.30 Hrs X 125.00	493314	Prepare Stipulation & Order to Exceed Interrogatory Limit.	\$ 37.50
Dec 20/2013	Lawyer: 215 1.50 Hrs X 125.00	493315	Prepare Interrogatories to Plaintiffs.	\$ 187.50
Dec 20/2013	Lawyer: 215 0.60 Hrs X 125.00	493316	Prepare Request for Production of Documents to Plaintiffs.	\$ 75.00
Dec 20/2013	Lawyer: 215 0.20 Hrs X 125.00	493318	Prepare letter to Plaintiff's attorney with Stipulation & Order to Exceed Interrogatory Limit.	\$ 25.00

<u>Date</u>	<u>Attorney # / Hours / Rate</u>	<u>Entry #</u>	<u>Explanation</u>	<u>Fees</u>
Apr 28/2014	Lawyer: 215 0.10 Hrs X 125.00	516769	Letter to Plaintiffs' attorney enclosing entered Order Denying Plaintiffs' Motion to Change Venue.	\$ 12.50
Apr 28/2014	Lawyer: 213 0.30 Hrs X 125.00	517448	Reveiw case law on motion for security for costs	\$ 37.50
Apr 29/2014	Lawyer: 213 0.60 Hrs X 125.00	517453	Review file and begin preparing motion for security for costs	\$ 75.00
Apr 30/2014	Lawyer: 213 6.00 Hrs X 125.00	517464	Continue file review and prepare motion for security for costs	\$ 750.00
May 1/2014	Lawyer: 213 1.10 Hrs X 125.00	520040	Prepare motion for security for costs.	\$ 137.50
May 1/2014	Lawyer: 213 3.20 Hrs X 125.00	520041	Finalize brief in support of motion for security for costs	\$ 400.00
May 1/2014	Lawyer: 213 1.60 Hrs X 125.00	524265	Telephone conference with clients re: plaintiff's inconsistencies in interrogatory responses.	\$ 200.00
May 5/2014	Lawyer: 213 0.20 Hrs X 125.00	520047	Review email from client re : revised timeline of events	\$ 25.00
May 7/2014	Lawyer: 213 0.20 Hrs X 125.00	520065	Phone call from client regarding updated timeline	\$ 25.00
May 9/2014	Lawyer: 213 0.30 Hrs X 125.00	520075	Telephone call from clients re: recent PPO violation by Plaintiff and upcoming show cause hearing	\$ 37.50
May 12/2014	Lawyer: 213 0.30 Hrs X 125.00	520100	Review records produced by Plaintiff	\$ 37.50
May 13/2014	Lawyer: 215 0.50 Hrs X 135.00	522618	Receipt and review of Plaintiff's Answers to Interrogatories and documents.	\$ 67.50
May 13/2014	Lawyer: 215 0.10 Hrs X 135.00	522619	Telephone conference with Court regarding Pretrial.	\$ 13.50
May 15/2014	Lawyer: 215 0.10 Hrs X 135.00	522567	Receipt and review of Plaintiff's Jury Demand.	\$ 13.50
May 15/2014	Lawyer: 215 4.80 Hrs X 135.00	523225	Prepare for and attend Pretrial Conference in Allegan.	\$ 648.00
May 15/2014	Lawyer: 215 1.40 Hrs X 135.00	523226	Edit and finalize Motion for Security for Costs.	\$ 189.00
May 15/2014	Lawyer: 215 0.30 Hrs X 135.00	523227	Telephone conference with client representative regarding Pretrial Conference and discovery.	\$ 40.50
May 15/2014	Lawyer: 215 0.30 Hrs X 135.00	523228	Prepare and draft Stipulation & Order on Service Protocol.	\$ 40.50
May 15/2014	Lawyer: 215 0.20 Hrs X 135.00	523229	Prepare and draft letter to Plaintiff's attorney regarding Stipulation & Order.	\$ 27.00
May 19/2014	Lawyer: 215 0.30 Hrs X 135.00	522792	Email from client representative regarding witnesses. Respond to client representative re: proposed	\$ 40.50
May 21/2014	Lawyer: 213 0.30 Hrs X 125.00	521109	discovery plan	\$ 37.50
May 27/2014	Lawyer: 213 0.50 Hrs X 125.00	521930	Prepare motion for summary disposition.	\$ 62.50
May 27/2014	Lawyer: 215 0.30 Hrs X 135.00	522919	Email from client representative regarding discovery and follow up on same.	\$ 40.50
May 27/2014	Lawyer: 213 0.50 Hrs X 125.00	524241	Prepare Brief in Support of Motion for Summary Disposition.	\$ 62.50
May 28/2014	Lawyer: 215 0.30 Hrs X 135.00	522504	Receipt and review of Plaintiff's First Amended Lay & Expert Witness list.	\$ 40.50
May 28/2014	Lawyer: 215 0.40 Hrs X 135.00	522988	Analyze Plaintiff's Amended Witness List for discovery and rebuttal.	\$ 54.00
May 28/2014	Lawyer: 215 0.30 Hrs X 135.00	522989	Telephone conference with client representative regarding discovery.	\$ 40.50

<u>Date</u>	<u>Attorney # / Hours / Rate</u>	<u>Entry #</u>	<u>Explanation</u>	<u>Fees</u>
May 28/2014	Lawyer: 215 1.40 Hrs X 135.00	522990	Plan for discovery.	\$ 189.00
Jun 3/2014	Lawyer: 215 0.70 Hrs X 135.00	528898	Telephone conference with client regarding Motion for Costs, inspections, photos and experts.	\$ 94.50
Jun 3/2014	Lawyer: 215 0.10 Hrs X 135.00	531636	Telephone conference with Judge' s office regarding Scheduling Order.	\$ 13.50
Jun 6/2014	Lawyer: 215 4.30 Hrs X 135.00	528971	Inspect property with client representative in Allegan. Receipt and review of Mr. Thinschmidt's letter and	\$ 580.50
Jun 9/2014	Lawyer: 215 0.30 Hrs X 135.00	531604	packet to Mallard Drive residents.	\$ 40.50
Jun 10/2014	Lawyer: 215 0.10 Hrs X 135.00	530838	Email from client representative regarding surveyor.	\$ 13.50
Jun 10/2014	Lawyer: 215 0.30 Hrs X 135.00	530839	Letter to Plaintiff's attorney regarding addresses of recipients of Plaintiff's counsel's letter.	\$ 40.50
Jun 11/2014	Lawyer: 213 0.10 Hrs X 125.00	528479	Voicemail from Mr. Benson and Walker re: cancelled PPO motions.	\$ 12.50
Jun 12/2014	Lawyer: 213 0.40 Hrs X 125.00	528491	Telephone conference with surveying expert Bren DeRose re: consultation and survey.	\$ 50.00
Jun 12/2014	Lawyer: 213 0.40 Hrs X 125.00	528494	Phone call from Mr. Benson and Mr. Kleussendorf re: their questions on status of litigation.	\$ 50.00
Jun 12/2014	Lawyer: 213 0.30 Hrs X 125.00	528499	Review/analyze Plaintiff's 1st amended witness list.	\$ 37.50
Jun 12/2014	Lawyer: 213 0.40 Hrs X 125.00	528500	Prepare expert witness interrogatories to Plaintiff	\$ 50.00
Jun 16/2014	Lawyer: 213 0.20 Hrs X 125.00	537796	Review correspondence from Brent Scholten, Drain Commission employee.	\$ 25.00
Jun 17/2014	Lawyer: 213 0.10 Hrs X 125.00	528612	Telephone call to Allegan County Drain Commissioner Brent Scholten.	\$ 12.50
Jun 18/2014	Lawyer: 213 0.30 Hrs X 125.00	528628	Prepare letter to Brent DeRose confirming initial site investigation.	\$ 37.50
Jun 18/2014	Lawyer: 213 0.30 Hrs X 125.00	537797	Phone conference with Allegan County drain commission employee Brent Scholten.	\$ 37.50
Jun 19/2014	Lawyer: 215 0.20 Hrs X 135.00	531539	Receipt and review of Scheduled Order from Pretrial Conference.	\$ 27.00
Jun 23/2014	Lawyer: 213 2.80 Hrs X 125.00	528651	Begin drafting Brief in Support of Motion for Partial Summary Disposition.	\$ 350.00
Jun 23/2014	Lawyer: 213 0.50 Hrs X 125.00	528653	Prepare Motion for Summary Disposition.	\$ 62.50
Jun 23/2014	Lawyer: 215 0.80 Hrs X 135.00	531192	Review Motion for Costs in preparation for hearing.	\$ 108.00
Jun 23/2014	Lawyer: 215 1.30 Hrs X 135.00	531193	Review documents from prior lawsuit for Motion. Analyze Plaintiff's response to Motion for Security	\$ 175.50
Jun 23/2014	Lawyer: 215 1.00 Hrs X 135.00	531194	Costs.	\$ 135.00
Jun 23/2014	Lawyer: 215 0.60 Hrs X 135.00	531195	Prepare notes for argument of Motion for Security for Costs.	\$ 81.00
Jun 23/2014	Lawyer: 215 6.50 Hrs X 135.00	531196	Attend Motion for Security for Costs in Allegan.	\$ 877.50
Jun 23/2014	Lawyer: 213 2.00 Hrs X 125.00	537798	Legal research on Michigan law of easement appurtenant and implied easement.	\$ 250.00
Jun 24/2014	Lawyer: 215 0.30 Hrs X 135.00	531197	Receipt and review of Plaintiff's list of recipients of letter to Plat owners.	\$ 40.50

<u>Date</u>	<u>Attorney # / Hours / Rate</u>	<u>Entry #</u>	<u>Explanation</u>	<u>Fees</u>
Jun 24/2014	Lawyer: 215 0.30 Hrs X 135.00	531198	Email regarding Motion to client representative.	\$ 40.50
Jun 24/2014	Lawyer: 215 0.20 Hrs X 135.00	531328	Receipt and review of entered Order regarding MTSC and Motion regarding Court Rights in Civil Suit.	\$ 27.00
Jun 24/2014	Lawyer: 215 0.10 Hrs X 135.00	531329	Letter to Mr. Thinschmidt enclosing entered Order regarding Service Protocol.	\$ 13.50
Jun 24/2014	Lawyer: 215 0.10 Hrs X 135.00	531330	Letter to clients enclosing entered Order regarding Service Protocol, Mr. Thinschmidt's packet to neighbors and entered Order regarding 2012 case.	\$ 13.50
Jun 25/2014	Lawyer: 215 0.20 Hrs X 135.00	529405	Telephone call to Judge Cronin's office re playing video at hearing.	\$ 27.00
Jun 25/2014	Lawyer: 215 8.20 Hrs X 135.00	529409	Continue drafting brief in support of motion for partial summary disposition.	\$ 1,107.00
Jun 26/2014	Lawyer: 213 0.40 Hrs X 125.00	529398	Revise and update witness list.	\$ 50.00
Jun 26/2014	Lawyer: 213 0.40 Hrs X 125.00	529399	Telephone conferece with clients regarding video taken by clients of Plaintiff	\$ 50.00
Jun 26/2014	Lawyer: 213 0.40 Hrs X 125.00	529403	Review client video of Plaintiff threatening lawsuit and transcribe.	\$ 50.00
Jun 26/2014	Lawyer: 213 0.20 Hrs X 125.00	537799	Continue drafting Motion for Partial Summary Disposition.	\$ 25.00
Jun 30/2014	Lawyer: 213 0.30 Hrs X 125.00	529412	Review tax map supplied by clients	\$ 37.50
Jul 1/2014	Lawyer: 213 0.20 Hrs X 125.00	531923	Telephone call with client re: rescheduled hearing date on Motion for Security for Costs.	\$ 25.00
Jul 3/2014	Lawyer: 213 0.20 Hrs X 125.00	537258	Telephone call from clients re inspection date.	\$ 25.00
Jul 8/2014	Lawyer: 213 0.30 Hrs X 125.00	531940	phone conference with excavator Rex Felker re: history of work on drainage ditch.	\$ 37.50
Jul 10/2014	Lawyer: 213 0.50 Hrs X 125.00	531949	Telephone conference with counsel for drain commission re deposition of drain commission employee	\$ 62.50
Jul 10/2014	Lawyer: 213 0.30 Hrs X 125.00	531950	Email to title search company Devon Title Agency re title search.	\$ 37.50
Jul 10/2014	Lawyer: 213 0.20 Hrs X 125.00	531959	Telephone conference with titlesearch company Devon Title re search request	\$ 25.00
Jul 10/2014	Lawyer: 213 0.30 Hrs X 125.00	531960	Email to title search company with requested documents for title search	\$ 37.50
Jul 10/2014	Lawyer: 213 0.20 Hrs X 125.00	537800	Email to client representative re authority to depose excavator.	\$ 25.00
Jul 11/2014	Lawyer: 213 0.20 Hrs X 125.00	535265	Prepare email response to client representative re: questions about deposing excavator Rex Felker.	\$ 25.00
Jul 14/2014	Lawyer: 213 0.20 Hrs X 125.00	535266	Telephone conference with Mr. Byberg of Municipal Risk Management re: deposition of Drain Commission Employee Brent Scholten.	\$ 25.00
Jul 14/2014	Lawyer: 213 2.00 Hrs X 125.00	535269	Prepare for deposition of Zoning Administrator Tasha Smalley	\$ 250.00
Jul 15/2014	Lawyer: 213 3.10 Hrs X 125.00	535690	Attend deposition of Ganges Township Zoning Administrator Tasha Smalley	\$ 387.50
Jul 16/2014	Lawyer: 213 0.30 Hrs X 125.00	535683	Prepare status report to client representative re: dceposition of Tasha Smalley, Zoning Administrator.	\$ 37.50

<u>Date</u>	<u>Attorney # / Hours / Rate</u>	<u>Entry #</u>	<u>Explanation</u>	<u>Fees</u>
Aug 13/2014	Lawyer: 213 0.50 Hrs X 125.00	538802	Revise Motion for Summary Disposition. Prepare affidavit of Drain Commission and forward to	\$ 62.50
Aug 13/2014	Lawyer: 213 0.50 Hrs X 125.00	538805	Allegan County attorney. Analyze for discovery to do to establish basis for Motion for Summary Disposition in relation to Court granting Defendant's Motion for Security and to avoid	\$ 62.50
Aug 13/2014	Lawyer: 205 1.60 Hrs X 135.00	539071	unnecessary costs.	\$ 216.00
Aug 13/2014	Lawyer: 205 0.20 Hrs X 135.00	539072	Telephone conference with client representative to discuss methods to reduce costs and still be ready to file Motion for Summary Disposition.	\$ 27.00
Aug 13/2014	Lawyer: 213 0.10 Hrs X 125.00	541254	Email from clients regarding Plaintiff's moving camping trailers out of road.	\$ 12.50
Aug 13/2014	Lawyer: 213 0.20 Hrs X 125.00	541255	Return telephone call to Brent Derosé confirming survey & topography.	\$ 25.00
Aug 13/2014	Lawyer: 213 8.00 Hrs X 125.00	541256	Travel to and attend inspection survey and topographical mapping of Defendant's/Plaintiff's and road way.	\$ 1,000.00
Aug 14/2014	Lawyer: 215 0.30 Hrs X 135.00	539112	Telephone conference with clients regarding Plaintiffs' moving of trailer for survey.	\$ 40.50
Aug 14/2014	Lawyer: 215 0.10 Hrs X 135.00	539113	Email from clients regarding survey.	\$ 13.50
Aug 25/2014	Lawyer: 215 0.20 Hrs X 135.00	540647	Email from client regarding fence photo.	\$ 27.00
Aug 25/2014	Lawyer: 215 0.20 Hrs X 135.00	540648	Email from client with photos of Plaintiff moving camping trailer.	\$ 27.00
Aug 25/2014	Lawyer: 215 0.10 Hrs X 135.00	540678	Review email from clients regarding photos of Plaintiffs moving camper trailer.	\$ 13.50
Aug 25/2014	Lawyer: 215 0.10 Hrs X 135.00	540679	Receipt and review of email from clients with picture showing fence building.	\$ 13.50
Aug 25/2014	Lawyer: 213 3.00 Hrs X 125.00	540705	Prepare for deposition of Blanche Hudson. Telephone call from clients regarding concerns over	\$ 375.00
Aug 25/2014	Lawyer: 213 0.20 Hrs X 125.00	540707	depositions.	\$ 25.00
Aug 25/2014	Lawyer: 213 3.40 Hrs X 125.00	540709	Prepare for deposition of Plaintiff Pat Foster.	\$ 425.00
Aug 25/2014	Lawyer: 213 0.20 Hrs X 125.00	541260	Email from Jim Dyer. Seven emails from client regarding pictures and video pertaining to rainwater run off at Defendant's	\$ 25.00
Aug 25/2014	Lawyer: 213 0.30 Hrs X 125.00	541261	property. Telephone call from clients regarding their surveillance of Plaintiff's and information for Plaintiff's	\$ 37.50
Aug 25/2014	Lawyer: 213 0.20 Hrs X 125.00	541262	depositions. Take deposition of Plaintiff Blanche Hudson (adjourned due to Plaintiffs aparent medical	\$ 25.00
Aug 26/2014	Lawyer: 213 1.80 Hrs X 125.00	540710	emergency).	\$ 225.00
Aug 26/2014	Lawyer: 213 0.20 Hrs X 125.00	540711	Telephone call to clients advising them of Blanche Hudson's deposition and adjournment of depositions of both Plaintiffs due to medicalemergency.	\$ 25.00
Aug 26/2014	Lawyer: 213 0.20 Hrs X 125.00	540712	Reply email to Allegan County Attorney regarding affidavit of drain commissioner and questions about litigation status.	\$ 25.00
Aug 26/2014	Lawyer: 213 0.10 Hrs X 125.00	540713	Telephone call from clients informing that Plaintiff Hudson returned home and appeared fine.	\$ 12.50

<u>Date</u>	<u>Attorney # / Hours / Rate</u>	<u>Entry #</u>	<u>Explanation</u>	<u>Fees</u>
Sep 15/2014	Lawyer: 213 0.30 Hrs X 125.00	546248	Telephone conference with clients regarding Plaintiff's Filing of Security Bond.	\$ 37.50
Sep 15/2014	Lawyer: 213 0.20 Hrs X 125.00	546251	Receipt and review of Surety Bond posted by Plaintiffs.	\$ 25.00
Sep 15/2014	Lawyer: 215 0.30 Hrs X 135.00	548038	Telephone call with client representative re; status.	\$ 40.50
Sep 15/2014	Lawyer: 215 0.30 Hrs X 135.00	548039	Analyze Surety Bond.	\$ 40.50
Sep 15/2014	Lawyer: 215 0.40 Hrs X 135.00	548041	Email to client representative re: status and bond.	\$ 54.00
Sep 15/2014	Lawyer: 215 0.20 Hrs X 135.00	548045	Telephone call to client representative re:posting bond.	\$ 27.00
Sep 15/2014	Lawyer: 215 1.20 Hrs X 135.00	555717	Work on strategy in lieu of Plaintiff's posting bond. Telephone conference with Plaintiff's attorney regardingscheduling depositions prior toMotion to	\$ 162.00
Sep 16/2014	Lawyer: 213 0.20 Hrs X 125.00	546213	Compel. Return telephone call to Plaintiffs' counsel regarding outstanding discovery and not adjourning our Motion	\$ 25.00
Sep 16/2014	Lawyer: 213 0.20 Hrs X 125.00	546214	to Compel. Finalize Stipulation & Order Extending Discovery and	\$ 25.00
Sep 16/2014	Lawyer: 213 0.20 Hrs X 125.00	546215	submitto Court.	\$ 25.00
Sep 16/2014	Lawyer: 213 0.20 Hrs X 125.00	546216	Email to Plaintiffs' attorney confirming telephone call regarding our outstanding discovery.	\$ 25.00
Sep 17/2014	Lawyer: 215 0.40 Hrs X 135.00	548191	Telephone call from clients re;water damages.	\$ 54.00
Sep 19/2014	Lawyer: 213 0.20 Hrs X 125.00	546234	Telephone call from clients regarding work being performedon Blue Goose Avenue.	\$ 25.00
Sep 22/2014	Lawyer: 215 0.10 Hrs X 135.00	544814	Receipt & review request for written deposition of William Flowers.	\$ 13.50
Sep 22/2014	Lawyer: 215 0.10 Hrs X 135.00	544815	Receipt & review Plaintiff's Offer for Judgment.	\$ 13.50
Sep 23/2014	Lawyer: 213 0.10 Hrs X 125.00	545119	Email Nederveld regarding topographical map/survey status.	\$ 12.50
Sep 23/2014	Lawyer: 213 0.10 Hrs X 125.00	545121	Receipt and review of topographical map/survey from Nederveld.	\$ 12.50
Sep 23/2014	Lawyer: 213 0.10 Hrs X 125.00	545123	Email clients with Plaintiffs' Offer For Judgment. Review Michigan Court Rules andcase law on "sum certain" requirement for Offer of Judgment in preparation to draft Motion to Strike Plaintiff's Offer	\$ 12.50
Sep 23/2014	Lawyer: 213 0.60 Hrs X 125.00	546096	of Judgment.	\$ 75.00
Sep 23/2014	Lawyer: 213 0.40 Hrs X 125.00	546097	Prepare Motion to Strike Plaintiff's Offer of Judgment. Prepare Brief in Support of Motion to Strike Plaintiff's	\$ 50.00
Sep 23/2014	Lawyer: 213 1.30 Hrs X 125.00	546098	Offer of Judgment.	\$ 162.50
Sep 23/2014	Lawyer: 213 0.60 Hrs X 125.00	546114	Review/analyze Plaintiff's Offer of Judgment in preparation to file Motion to Strike.	\$ 75.00
Sep 23/2014	Lawyer: 213 0.20 Hrs X 125.00	546115	Receipt/review Plaintiff's request for written depositionof William Flanders.	\$ 25.00
Sep 23/2014	Lawyer: 215 0.60 Hrs X 135.00	548294	Analyze Plaintiff's offer of Judgment.	\$ 81.00
Sep 24/2014	Lawyer: 213 0.30 Hrs X 125.00	546101	Revise and finalize Brief in Support of Motion to Strike.	\$ 37.50
Sep 24/2014	Lawyer: 213 0.30 Hrs X 125.00	546103	Telephone conference with clients regarding Plaintiff's Offer of Judgment.	\$ 37.50

<u>Date</u>	<u>Attorney # / Hours / Rate</u>	<u>Entry #</u>	<u>Explanation</u>	<u>Fees</u>
Apr 10/2015	Lawyer: 215 0.70 Hrs X 135.00	590821	Research re: election of Judge Cronin as alleged in Plaintiffs' motion.	\$ 94.50
Apr 14/2015	Lawyer: 215 0.90 Hrs X 135.00	590869	Analyze Plaintiff's appeal brief to Chief Judge to disqualify Judge Cronin for reply.	\$ 121.50
Apr 14/2015	Lawyer: 215 0.80 Hrs X 135.00	590870	Analyze transcript of 3-30-15 motion hearing to prepare brief.	\$ 108.00
Apr 14/2015	Lawyer: 215 2.40 Hrs X 135.00	590871	Prepare & draft brief to Chief Judge in opposition to Plaintiff's motion to disqualify Judge Cronin.	\$ 324.00
Apr 14/2015	Lawyer: 215 0.10 Hrs X 135.00	591459	Email to Court recorder requesting transcript of 3/30/15 hearing on Plaintiffs' motion to disqualify.	\$ 13.50
Apr 14/2015	Lawyer: 215 0.10 Hrs X 135.00	591466	Receipt & review email from Court recorder with transcript of 3/30/15 motion to disqualify Judge Cronin.	\$ 13.50
Apr 14/2015	Lawyer: 215 0.30 Hrs X 135.00	601268	Email from clients re: Plaintiffs' recent actions to block culvert.	\$ 40.50
Apr 20/2015	Lawyer: 215 0.20 Hrs X 135.00	591545	Receipt & review proof of service from ProPer Plaintiffs and Affidavit of Donald Thinschmidt.	\$ 27.00
Apr 24/2015	Lawyer: 215 4.80 Hrs X 135.00	591036	Prepare for and attend argument on Plaintiff's appeal of motion to disqualify Judge Cronin.	\$ 648.00
Apr 24/2015	Lawyer: 215 0.30 Hrs X 135.00	600993	Telephone call to clients re: hearing.	\$ 40.50
Apr 27/2015	Lawyer: 215 0.20 Hrs X 135.00	591875	Telephone call from client re: outcome of motion on 4-24-15.	\$ 27.00
Apr 27/2015	Lawyer: 215 0.20 Hrs X 135.00	591877	Prepare submission of order under 7-day rule.	\$ 27.00
Apr 27/2015	Lawyer: 215 0.10 Hrs X 135.00	591878	Prepare letter to Court filing order under 7 day rule.	\$ 13.50
Apr 27/2015	Lawyer: 215 0.40 Hrs X 135.00	591879	Prepare letter to Court filing order under 7 day rule.	\$ 13.50
Apr 27/2015	Lawyer: 215 0.40 Hrs X 135.00	591879	Email to client representative re: Plaintiffs' motion.	\$ 54.00
Apr 27/2015	Lawyer: 215 0.30 Hrs X 135.00	600994	Draft & prepare order denying Plaintiffs' appeal to Judge Bakker re: Judge Cronin's denial of Plaintiff's motion to disqualify himself.	\$ 40.50
May 4/2015	Lawyer: 215 0.30 Hrs X 135.00	597255	Receipt & review Plaintiff proof of service & affidavits by David Dowling, Mary Pat Foster, Blanche Hudson.	\$ 40.50
May 8/2015	Lawyer: 215 0.10 Hrs X 135.00	597582	Telephone call to Court Recorder re: status of ordered transcript of hearing on 4-20-15.	\$ 13.50
May 10/2015	Lawyer: 215 1.00 Hrs X 135.00	597124	Analyze Nederveld Report in preparation for MSD.	\$ 135.00
May 10/2015	Lawyer: 215 1.40 Hrs X 135.00	597125	Analyze deposition of Plaintiff's in preparation for MSD.	\$ 189.00
May 10/2015	Lawyer: 215 1.10 Hrs X 135.00	597127	Review deposition of excavator, Rex Felker, for MSD.	\$ 148.50
May 10/2015	Lawyer: 215 0.80 Hrs X 135.00	600995	Prepare demonstrative exhibits to argue MSD.	\$ 108.00
May 10/2015	Lawyer: 215 0.70 Hrs X 135.00	600996	Review deposition of Township Zoning official, Tasha Smally, for MSD.	\$ 94.50
May 11/2015	Lawyer: 215 5.20 Hrs X 135.00	597129	Prepare for & argue MSD in Allegan.	\$ 702.00
May 12/2015	Lawyer: 217 0.60 Hrs X 135.00	596819	Begin outline of argument for motion for costs and application of security bond to same	\$ 81.00
May 12/2015	Lawyer: 215 0.30 Hrs X 135.00	597132	Telephone call to client representative re: MSD and issues related to clients blocking culvert and Motion for Costs.	\$ 40.50