

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

March 29, 2019
Invoice: 97499158

Date	Atty	Description Of Services Rendered	Hours
2/26/19	JEF	Confer with counsel for appraiser Hinton.	.30
2/27/19	JEF	Review, edit, and send supplemental PIA response letter.	.20
2/28/19	KWM	Finalize correspondence to Attorney General with correction to Brief; arrange hand delivery; email B. Aleshire regarding same.	.20

TOTAL PROFESSIONAL SERVICES \$ 6,505.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Jose E de la Fuente	Principal	13.00	300.00	3,900.00
Ashley D Thomas	Associate	9.50	270.00	2,565.00
Karen W Mallios	Litigation Support Specia	.30	135.00	40.50
TOTALS		22.80		\$ 6,505.50

DISBURSEMENTS

Date	Description	Amount
	Photocopying	5.60
2/15/19	Corporate Couriers Check # - 000036430 Corporate Couriers, Courier services, 2/15/2019	32.00
2/28/19	Corporate Couriers Check # - 000036497 Corporate Couriers, Courier services, 2/28/2019	32.00
2/28/19	Corporate Couriers Check # - 000036497 Corporate Couriers, Courier services, 2/28/2019	20.00

TOTAL DISBURSEMENTS \$ 89.60

TOTAL THIS INVOICE \$ 6,595.10

April 22, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Rd
Spicewood, TX 78669

Invoice: 97499793
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through March 31, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 2,400.00
Total Disbursements	<u>\$ 13.40</u>
TOTAL THIS INVOICE	\$ 2,413.40

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

April 22, 2019
Invoice: 97499793

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
3/11/19	JEF	Confer with new board members regarding status and facts of disputes, and pending litigation, and discussion of possible paths forward; prepare notes regarding same.	.90
3/12/19	JEF	Email from counsel for TOMA Integrity; compile and send litigation-related documents to new board chair.	.40
3/14/19	JEF	Review questions from client and prepare and send answers to same regarding case status and approaches.	.60
3/18/19	JEF	Call from opposing counsel regarding case status.	.20
3/20/19	JEF	Work on PIA requests and client concerns and thoughts regarding same; work with staff on deadlines and process.	.40
3/25/19	JEF	Review and comment on draft agenda.	.20
3/26/19	JEF	Review summary judgment motion and email regarding same.	.40
3/27/19	JEF	Review and send litigation correspondence to client; emails with client regarding same; work with attorney team on strategies for meeting; review appellant's brief and prepare thoughts regarding same, including research of responsive cases.	1.30
3/28/19	JEF	Review PIA response approach and status; review correspondence from opposing counsel, and citations in same.	.50
3/29/19	JEF	Prepare for pre-meeting and board meeting; attend pre-meeting with litigation subcommittee to discuss litigation paths; prepare for and advise client at board meeting regarding different appellate and litigation paths and strategies.	3.10

TOTAL PROFESSIONAL SERVICES \$ 2,400.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Jose E de la Fuente	Principal	8.00	300.00	2,400.00
TOTALS		8.00		\$ 2,400.00

DISBURSEMENTS

Date	Description	Amount
	Photocopying	11.40
	Color Prints	2.00

TOTAL DISBURSEMENTS \$ 13.40

TOTAL THIS INVOICE \$ 2,413.40

Lloyd Gosselink Rochelle & Townsend, P.C.

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Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

April 22, 2019
Invoice: 97499793

May 23, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Rd
Spicewood, TX 78669

Invoice: 97500706
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through April 30, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 2,204.00
Total Disbursements	<u>\$ 10.29</u>
TOTAL THIS INVOICE	\$ 2,214.29

JEF

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

May 23, 2019
Invoice: 97500706

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
4/02/19	JEF	Review email from B. Aleshire regarding land sale issue; review correspondence between Aleshire and counsel for Friendship Homes regarding settlement demands.	.40
4/05/19	JEF	Review email regarding easement issues.	.30
4/07/19	ERL	Research on requirements of an enforceable easement for J. de la Fuente	.30
4/08/19	ERL	Finish J. de la Fuente easement research and review current client easement language based on research; Office conference with J. de la Fuente regarding easement; email to H. Ging regarding pulling Warranty Deed to analyze sufficiency of easement; review easement in Warranty Deed and note outstanding issues.	1.60
4/08/19	JEF	Confer with J. Gimenez regarding business organizations code and memo on same; prepare and send memo on same; discuss easement issue with J. Gimenez; review preliminary findings on easement issue.	.80
4/08/19	HEG	Research warranty deed with Friendship Homes.	.30
4/09/19	JEF	Email with client regarding suggested response to PIA requests.	.30
4/10/19	ERL	Draft follow up email response to J. de la Fuente regarding current easement and recommended supplements.	.30
4/10/19	JEF	Review notes on easement issues.	.30
4/12/19	JEF	Email with client regarding response to B. Aleshire.	.20
4/22/19	MAG	Follow up with J. de la Fuente regarding opposing counsel's correspondence and request regarding our bylaws and Tax Code issues.	.20
4/22/19	JEF	Review emails from opposing counsel; work on appellate issues and timing; review Attorney General response, and strategy for same; confer with client regarding subpoena.	.60
4/23/19	JEF	Confer with opposing counsel regarding appellate timeline; prepare and file motion for extension of time to file brief.	.50
4/24/19	JEF	Correspond with opposing counsel regarding PIA requests; review notice of hearing; follow up on plans for litigation relating to actions by third parties.	.40
4/25/19	JEF	Prepare and send correspondence regarding demand letter in response to public information act request and ruling; research for appellate brief items.	.90
4/25/19	HEG	Work on information responsive to B. Aleshire's PIA request.	.30
4/30/19	JEF	Work on issues for appellate brief.	.50

TOTAL PROFESSIONAL SERVICES

\$ 2,204.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Michael A Gershon	Principal	.20	300.00	60.00
Jose E de la Fuente	Principal	5.20	300.00	1,560.00
Emily R Linn	Associate	2.20	230.00	506.00

Lloyd Gosselink Rochelle & Townsend, P.C.

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Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I D.3870-1-JEF

May 23, 2019
Invoice: 97500706

Hannah E Ging	Paralegal	.60	130.00	78.00
TOTALS		8.20		\$ 2,204.00

DISBURSEMENTS

Date	Description	Amount
4/25/19	GL Grp 0012735/00014 Voucher # - 000000000 April 2019 eFiling fee, 6th Court of Appeals, Filing Fee	10.29

TOTAL DISBURSEMENTS **\$ 10.29**

TOTAL THIS INVOICE **\$ 2,214.29**

June 25, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Road
Spicewood, TX 78669

Invoice: 97501280
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through May 31, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 10,693.50
Total Disbursements	<u>\$ 15.50</u>
TOTAL THIS INVOICE	\$ 10,709.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D 3870-1-JEF

June 25, 2019
Invoice: 97501280

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
5/02/19	MAG	No Charge - Review easement issues and update from J. de la Fuente.	.30
5/02/19	JEF	Review client request for update on litigation topics; email M. Gershon information for client email.	.40
5/04/19	MAG	No Charge - Review incoming correspondence and easement documents; forward same to J. de la Fuente.	.30
5/06/19	JEF	Review copies of professional complaints regarding D. Martin.	.20
5/07/19	MAG	No Charge - Review and follow up with J. de la Fuente regarding opposing counsel's correspondence and valuation work to be disclosed over next several days.	.20
5/07/19	JEF	Call from counsel for Friendship Homes regarding appraisal issues and timing; call to client regarding same, and general update of litigation posture.	.30
5/11/19	JEF	Work on appellee's brief in response to TOMA Integrity appeal, including research and drafting.	2.20
5/12/19	JEF	Work on research and drafting of appellee's brief.	2.90
5/13/19	JEF	Work on research and drafting for appellate brief.	1.40
5/14/19	MAG	No Charge - Review today's correspondence from opposing counsel and follow up with J. de la Fuente regarding next steps.	.10
5/14/19	JEF	Work on draft appellee's brief, including review of relevant portions of Clerk's record; review new intervention from new plaintiffs in Burnet county matter; email same to client with comments on same; review Friendship Homes appraisal of property, and send email discussing same to client.	4.10
5/14/19	GCS	Research questions of statutory interpretation as to discretion with respect to voidability and potential mootness.	.40
5/14/19	GCS	Review and analyze Appellants' brief in support of appeal.	.40
5/14/19	GCS	Review and analyze the clerk's written record to compare factual assertions and provide factual support.	.50
5/14/19	GCS	Draft and revise Appellee brief to include relevant case law and citations.	2.70
5/15/19	JFP	Assess and develop appellate arguments for inclusion in brief with J. de la Fuente and G. Smith.	.40
5/15/19	JEF	Forward new pleadings and appraisal to client, with explanatory emails; work on appellate brief, including research and drafting.	3.90
5/15/19	GCS	Draft and revise brief in response to appeal; strategize regarding arguments for brief.	5.10
5/16/19	JFP	Revise and edit appellee's brief.	1.20
5/16/19	JEF	Work on appellee's brief with litigation team and staff, including additions and edits to same; work on specific issues for filing.	1.10
5/16/19	GCS	Draft and revise response brief; office conference with K. Mallios regarding additional revisions to brief.	3.00
5/16/19	KWM	Begin assistance with proof reading, cite checking and editing Brief for Appellee; office conference with G. Smith and J. de la Fuente regarding same.	3.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

June 25, 2019
Invoice: 97501280

Date	Atty	Description Of Services Rendered	Hours
5/17/19	JFP	Revise and edit brief.	1.00
5/17/19	JEF	Finalize and file appellate brief.	.90
5/17/19	GCS	Review and revise final briefing.	.60
5/17/19	KWM	Continued assistance with proof reading, cite checking and editing Brief for Appellee; office conference with J. de la Fuente regarding same; begin preparation of Appendices for Brief; finalize Brief and efile with Court; email all parties of record regarding same.	5.00
5/20/19	KWM	Retrieve file stamped copy of Brief for Appellee's; email all parties regarding same; case management.	.20
5/22/19	MAG	No Charge - Review client's correspondence and request and follow up with J. de la Fuente regarding same.	.20
5/22/19	JEF	Review additional emails regarding disputes, respond to same.	.40

TOTAL PROFESSIONAL SERVICES \$ 10,693.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Rate	Hours	Amount	N/C Hr	N/C \$
Michael A Gershon	Principal	.00	.00	.00	1.10	330.00
Jose E de la Fuente	Principal	300.00	17.80	5,340.00	.00	.00
James F Parker	Principal	290.00	2.60	754.00	.00	.00
Gabrielle C Smith	Associate	275.00	12.70	3,492.50	.00	.00
Karen W Mallios	Litigation	135.00	8.20	1,107.00	.00	.00
TOTALS			41.30	\$ 10,693.50	1.10	\$ 330.00

DISBURSEMENTS

Date	Description	Amount
	Postage	15.50

TOTAL DISBURSEMENTS \$ 15.50

TOTAL THIS INVOICE \$ 10,709.00

July 31, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Road
Spicewood, TX 78669

Invoice: 97502005
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 1,309.50
Total Disbursements	<u>\$ 1.80</u>
TOTAL THIS INVOICE	\$ 1,311.30

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

July 31, 2019
Invoice: 97502005

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
6/03/19	JEF	Review reply brief in TOMA Integrity appeal.	.40
6/03/19	HEG	Telephone conference with Director regarding service paperwork.	.20
6/04/19	HEG	Coordinate with Director to receive service paperwork.	.40
6/05/19	HEG	Work with secretary regarding citations of service and answer deadlines.	.30
6/11/19	HEG	Case management.	.30
6/12/19	JEF	Prepare for and conduct meeting with client Board regarding various pieces of litigation, and paths forward for same.	3.10
6/24/19	JEF	Review pleadings filed and opposing counsel comment on same.	.30
6/27/19	KWM	Review emails to and from M. Gershon and M. Nelson.	.10

TOTAL PROFESSIONAL SERVICES **\$ 1,309.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Jose E de la Fuente	Principal	3.80	300.00	1,140.00
Hannah E Ging	Paralegal	1.20	130.00	156.00
Karen W Mallios	Litigation Support Specia	.10	135.00	13.50
TOTALS		5.10		\$ 1,309.50

DISBURSEMENTS

Date	Description	Amount
	Photocopying	1.80

TOTAL DISBURSEMENTS **\$ 1.80**

TOTAL THIS INVOICE **\$ 1,311.30**

August 14, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Road
Spicewood, TX 78669

Invoice: 97502738
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 130.00
Total Disbursements	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 130.00

JEF

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

August 14, 2019
Invoice: 97502738

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
7/17/19	HEG	Case management.	1.00

TOTAL PROFESSIONAL SERVICES **\$ 130.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Hannah E Ging	Paralegal	1.00	130.00	130.00
TOTALS		1.00		\$ 130.00

TOTAL THIS INVOICE **\$ 130.00**

September 23, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Road
Spicewood, TX 78669

Invoice: 97503479
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through August 31, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 390.00
Total Disbursements	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 390.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

September 23, 2019
Invoice: 97503479

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
8/01/19	JEF	Work on mediation approach.	.30
8/20/19	JEF	Emails with opposing counsel regarding petition for review.	.20
8/27/19	JEF	Review email from new counsel for plaintiffs.	.20
8/29/19	JEF	Review email from K. Allen, respond to same; circulate same to client with comments.	.40
8/31/19	JEF	Review email from M. Mitchell responding to plaintiffs.	.20

TOTAL PROFESSIONAL SERVICES \$ 390.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Hours	Rate	Total
Jose E de la Fuente	Principal	1.30	300.00	390.00
TOTALS		1.30		\$ 390.00

TOTAL THIS INVOICE \$ 390.00

October 16, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Road
Spicewood, TX 78669

Invoice: 97504405
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through September 30, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 9,984.00
Total Disbursements	<u>\$ 600.00</u>
TOTAL THIS INVOICE	\$ 10,584.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

October 16, 2019
Invoice: 97504405

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
9/03/19	JEF	Review emails among all parties regarding case path; confer with counsel for Friendship homes regarding mediation; confer with client contact regarding case issues, overall path forward, and mediation specifics; review first requests for production to Dana Martin; email to insurance adjuster regarding coverage.	1.10
9/04/19	JEF	Call with all litigation counsel to discuss scheduling, case issues, and next steps; work with client to schedule mediation; confirm and set same, communicate with mediator; review live petition for case issues to prepare for mediation	.80
9/06/19	JEF	Begin work on mediation statement.	1.60
9/06/19	JTB	Review correspondence regarding upcoming mediation and attached documents from J. de la Fuente; correspondence with J. de la Fuente to assist in preparation for mediation; research regarding WSC authority to sell or convey property.	2.10
9/09/19	JEF	Prepare for mediation, including finalizing letter and exhibits to send to mediator, send same; preparatory call with client representatives; review possible issues with plaintiffs' claims.	1.70
9/09/19	JTB	Continue research into power and abilities of WSCs; correspondence with J. de la Fuente regarding same and relaying research findings.	1.70
9/10/19	JFP	Assess legal theories and possible avenues to ratify contract.	.20
9/10/19	JEF	Prepare for and conduct mediation, finalize settlement terms; review emails in underlying litigation.	6.40
9/11/19	JEF	Work on additional approaches and issues for possible settlement; follow up on plan for PIA appeal; review emails in underlying litigation.	.90
9/12/19	JEF	Emails with opposing counsel regarding settlement issues.	.20
9/13/19	JEF	Work on follow up to settlement agreement; review possible PIA appeal related to litigation, and edit same.	1.10
9/16/19	JEF	Review executed agreement and send same; review final draft of PIA appeal petition for filing.	.40
9/17/19	JEF	Review additional settlement update and possible timing issues.	.30
9/18/19	JEF	Prepare for and attend board meeting to address possible settlement and path forward; travel to and from same.	2.20
9/18/19	JEF	No Charge - Travel to and from Board meeting.	1.00
9/20/19	JFP	Revise and edit motion to quash depositions.	.20
9/20/19	JEF	Review deposition notices; prepare and file motion for protection from same; review email and issues regarding privileged document.	2.10
9/22/19	JEF	Review emails and respond to same with opposing counsel.	.40
9/23/19	JEF	Review email from S. O'Brien regarding depositions; review additional email from opposing counsel regarding discovery; review written discovery from plaintiffs; begin working on response plan, and plan for briefing plea to jurisdiction.	1.10
9/24/19	JFP	Email with client contact regarding certain documents; work on approaches for plea to jurisdiction and possible motion for summary judgment; review emails from	1.10

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

October 16, 2019
Invoice: 97504405

Date	Atty	Description Of Services Rendered	Hours
		opposing counsel to court regarding possible discovery hearings; work with staff on hearing dates for plea to jurisdiction.	
9/24/19	JTB	Discussion with L. Killeen regarding prior research for WSC powers/abilities to sell or convey property; correspondence with J. de la Fuente and L. Killeen regarding same and path forward in responsive pleading; review discovery requests.	1.90
9/24/19	LRK	Get up to date on posture of the case; Read and review First Interrogatories and Request for Production; research ultra vires claim; determine if we will need an evidentiary plea to the jurisdiction or not; update J. de la Fuente	4.10
9/25/19	JEF	Emails with opposing counsel regarding various litigation matters; review order from court, and confer with team regarding same; confer with counsel for co-defendants regarding same.	.70
9/25/19	KWM	Review Intervenor's First Set of Interrogatories and Request for Production to Windermere Oaks; review Defendant Windermere's Motion for Protection and Motion to Quash Intervenor's Deposition Notice; review Defendant Mebane's Motion for Protection and Motion to Quash Plaintiffs/Intervenor's Deposition Notice; calendar response deadlines for same	.20
9/26/19	JEF	Review emails among counsel regarding scheduling and privilege issues; confer with client representatives regarding path forward; confer with co-defense counsel regarding same.	1.00
9/27/19	JEF	Call with co-defense counsel regarding planned agreed order; follow up on certain case facts regarding memberships; review email from D. Flunker; prepare for and conduct call with all counsel to reach agreement and submit same to court; review draft agreed report and edit same, send to all counsel.	1.30
9/28/19	JEF	Review final version of status report to court, email with all counsel to approve same.	.30
9/30/19	JEF	Review filing of final report to court; review additional discovery requests; review draft client correspondence in response to D. Flunker issues.	.40
9/30/19	KWM	Review Intervenor's Second Request for Production of Documents to Windermere and calendar deadline for response.	.10

TOTAL PROFESSIONAL SERVICES

\$ 9,984.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Rate	Hours	Amount	N/C Hr	N/C \$
Jose E de la Fuente	Principal	300.00	25.10	7,530.00	1.00	300.00
J Troupe Brewer	Associate	270.00	5.70	1,539.00	.00	.00
James F Parker	Principal	290.00	.40	116.00	.00	.00
Lindsay R Killeen	Associate	185.00	4.10	758.50	.00	.00
Karen W Mallios	Litigation	135.00	.30	40.50	.00	.00
TOTALS			35.60	\$ 9,984.00	1.00	\$ 300.00

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
LD.3870-1-JEF

October 16, 2019
Invoice: 97504405

DISBURSEMENTS

Date	Description	Amount
9/06/19	Clark Legal Services Check # - 000037271 Miscellaneous Expense, Clark Legal Services, PLLC, Mediator's fee for Windermere Oaks on 09/10/19, 09/06/2019	600.00

TOTAL DISBURSEMENTS **\$ 600.00**

TOTAL THIS INVOICE **\$ 10,584.00**

November 25, 2019

Windermere Oaks Water Supply Corporation
Attn Joe Gimenez
Board President
424 Coventry Road
Spicewood, TX 78669

Invoice: 97505063
Client: 3870
Matter: 1
Billing Attorney: JEF

INVOICE SUMMARY

For professional services and disbursements rendered through October 31, 2019:

RE: TOMA Integrity Litigation

Professional Services	\$ 30,884.00
Courtesy Discount	<u>\$ -1,500.00</u>
Net Professional Services	\$ 29,384.00
Total Disbursements	<u>\$ 41.76</u>
TOTAL THIS INVOICE	\$ 29,425.76

Retainer Held on Account \$ 2,500.00



Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

November 25, 2019
Invoice: 97505063

PROFESSIONAL SERVICES RENDERED

Date	Atty	Description Of Services Rendered	Hours
10/01/19	JEF	Review update from court; work on strategy on discovery responses.	.30
10/01/19	LRK	Begin research for plea to the jurisdiction.	1.70
10/01/19	KWM	Review calendar deadlines pursuant to Joint Status Report.	.20
10/02/19	JEF	Work on discovery responses and Rule 11 agreement regarding same.	.20
10/02/19	LRK	Read and review new filings; read and review discovery ahead of call with client; research for PTJ.	3.60
10/02/19	KWM	Review Defendant Friendship Homes & Hangers' Plea to the Jurisdiction and First Amended Answer.	.10
10/03/19	JEF	Follow up communications regarding discovery agreements.	.30
10/03/19	LRK	Research and write plea to the jurisdiction.	1.70
10/04/19	JEF	Work on settlement and meeting issues relating to same, including agenda and communications for same.	.40
10/07/19	MAG	Review correspondence then work with T. Brewer on multiple issues pending before Board this week, including edit of Board President's outline/statement regarding litigation.	80
10/08/19	KWM	Review Petition for Review filed by TOMA Integrity and calendar deadline for response.	.10
10/09/19	JEF	Send letter to supreme court regarding petition for review.	.30
10/10/19	JEF	Work on discovery approaches; review emails among other parties regarding same; prepare materials for client discussion regarding discovery.	1.10
10/10/19	LRK	Read and review opposing counsel correspondence and approach to discovery dispute, coordinate approach on discovery; formulate questions for call with client; draft discovery responses.	3.10
10/10/19	LRK	No Charge - Read and review opposing counsel correspondence and approach to discovery dispute, coordinate approach on discovery; formulate questions for call with client; draft discovery responses	2.00
10/11/19	JEF	Work with client representatives on discovery responses and strategy for same; work on agenda and communications approaches for discussion of settlement and resolution; call to opposing counsel regarding same.	2.10
10/11/19	LRK	Draft discovery responses; Read and review deposition notices; call with client; update questions for call with B. Earnst.	3.20
10/14/19	JEF	Call with client representative regarding case facts for discovery responses; work with opposing counsel on approach to settlement, and discussion of same in open meeting; work on agenda approach for October 26 meeting; emails to additional witnesses regarding case facts.	2.10
10/14/19	LRK	Update discovery responses after call with client; call with B. Earnst on discovery responses; Read and review emails with board members lawyer on call; call paralegal to get responsive documents	2.80
10/15/19	JEF	Work on interview schedule for additional witnesses to answer discovery.	.40

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

November 25, 2019
Invoice: 97505063

Date	Atty	Description Of Services Rendered	Hours
10/15/19	LRK	Review what documents need to be pulled from records with paralegal for requests for production.	.50
10/16/19	JEF	Work on discovery responses.	.30
10/16/19	LRK	Read and review documents sent by paralegal, for ward to J. de la Fuente; read and review emails from clients on tracking down documents for production; work on updated Plea to the Jurisdiction.	1.80
10/16/19	AAC	Assist Litigation Practice Group with discovery responses; search DMS for responsive documents.	.80
10/17/19	JEF	Confer with co-defense counsel regarding motion strategy; work on plan for additional responsive discovery information.	.40
10/17/19	LRK	Research and draft plea to the jurisdiction and motion for summary judgment: call with J. de la Fuente regarding same.	2.80
10/17/19	LRK	No Charge - Research and draft plea to the jurisdiction and motion for summary judgment; call with J. de la Fuente regarding same.	1.50
10/18/19	JEF	Confer with witnesses in support of discovery responses and plea to jurisdiction and summary judgment issues; follow up on plan for same.	.90
10/18/19	LRK	Call with directors regarding discovery responses; work on discovery responses.	1.80
10/21/19	JEF	Work on discovery responses.	1.10
10/21/19	LRK	Review notes from Friday call with directors; incorporate into Draft discovery requests; email B. Earnst to follow up about document in his possession; call with paralegal about doing a general search of what appraisals are in our possession and if "Flunker" interest in property ever was put in writing; send draft discovery responses to J. de la Fuente for review; review new documents for production; send draft discovery to client	5.00
10/21/19	AAC	Assist L. Killeen and Litigation Practice Group with discovery responses.	1.50
10/22/19	JEF	Work on outline and drafting of motion for summary judgment; emails with opposing counsel regarding discovery; confer with board member regarding deal terms for meeting; work on discovery responses; work with opposing counsel on agreement language.	2.40
10/22/19	STG	Review of case file and pleadings; attention to status of case and summary of facts related to litigation; attention to strategy regarding preparation of plea to the jurisdiction and motion for summary judgment and planning for same	5.20
10/22/19	LRK	Prepare docs for J. de la Fuente call with opposing counsel; prepare document log with paralegal for production; send production to Joe for feedback; get S. Glasser read in, send material, work on ple to the jurisdiction draft and organization; meet with J. de la Fuente; give assignment to paralegal looking for 2006 appraisal.	2.20
10/22/19	LRK	No Charge - Prepare docs for J. de la Fuente call with opposing counsel; prepare document log with paralegal for production; send production to Joe for feedback; get S. Glasser read in, send material, work on ple to the jurisdiction draft and organization; meet with J. de la Fuente; give assignment to paralegal looking for 2006 appraisal	2.20
10/22/19	AAC	Assist Litigation Practice Group with client discovery responses; search DMS files	.50

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Date	Atty	Description Of Services Rendered	Hours
		for responsive documents.	
10/23/19	JEF	Work on discovery responses; work on strategies for motion to dismiss; work on approach to settlement agreement and consideration of same at meeting.	.60
10/23/19	STG	Attention to update regarding factual summary section of motion for summary judgment; review and comment on initial draft of Factual Summary in PTJ and MSJ; begin legal research regarding vote on Amended and Superseding Agreement to take place of prior agreement enacted in violation of TOMA.	6.00
10/23/19	STG	No Charge - Attention to update regarding factual summary section of motion for summary judgment; review and comment on initial draft of Factual Summary in PTJ and MSJ; begin legal research regarding vote on Amended and Superseding Agreement to take place of prior agreement enacted in violation of TOMA.	.70
10/23/19	LRK	Finalize responses to first discovery requests; meet with paralegal to organize production; email to board president with follow up call to get verification; work on PTJ and MSJ; draft responses to 2nd discovery requests; send to J. de la Fuente.	5.50
10/23/19	LRK	No Charge - Finalize responses to first discovery requests; meet with paralegal to organize production; email to board president with follow up call to get verification; work on PTJ and MSJ; draft responses to 2nd discovery requests; send to J. de la Fuente.	2.00
10/23/19	KWM	Office conference with L. Killeen regarding discovery responses due today.	.30
10/24/19	JEF	Finalize discovery responses; work on strategies for motion for summary judgment; review additional documents for agreement; confer with opposing counsel regarding same; confer with opposing counsel regarding discovery responses and approach, and possible new claims.	2.20
10/24/19	STG	Discussion with J. de la Fuente and L. Killeen regarding ratification of agreement and facts underlying same; legal research regarding using new transaction to moot claims; discussion regarding strategy in language at open meeting on 10/26; prepare initial draft of talking points related to same.	5.40
10/24/19	LRK	Finalize discovery; send 2nd round of discovery to J. de la Fuente; research and draft motion for summary judgment.	4.30
10/24/19	LRK	No Charge - Finalize discovery; send 2nd round of discovery to J. de la Fuente; research and draft motion for summary judgment.	1.00
10/24/19	KWM	Telephone call to Burnet County District Clerk regarding local rules; review Local Rules on county court website; begin bates labeling documents responsive to request for production of documents.	.50
10/25/19	JEF	Work on final forms of settlement documents.	.90
10/25/19	STG	Continued preparation of draft talking points addressing background of new superseding agreement; discussion with L. Killeen regarding status of motion for summary judgment; legal research regarding mootness argument in plea to the jurisdiction.	2.40
10/25/19	LRK	Read and review verification; send to paralegal to get e-filed; call with other defendant's attorney	.70
10/26/19	JEF	Prepare for and assist with discussion of litigation matters for board meeting.	1.70

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Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
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Date	Atty	Description Of Services Rendered	Hours
		travel to and from same.	
10/26/19	JEF	No Charge - Travel to and from Board meeting.	1.00
10/26/19	LRK	Edit and send to J. de la Fuente second set of requests for production;	.60
10/27/19	LRK	Draft motion for summary judgment.	3.00
10/27/19	LRK	No Charge - Draft motion for summary judgment.	1.30
10/28/19	JEF	Finalize responses to RFPs for service of same; follow up on issues from board meeting; work on closing documents necessary as exhibits for motion for summary judgment, including draft amended and restated agreement; review and comment on draft motion for summary judgment.	2.50
10/28/19	STG	Continued legal research regarding mootness argument in plea to the jurisdiction and preparation of argument in plea to the jurisdiction on same.	3.70
10/28/19	LRK	Finalize 2nd request for production; draft for MSJ.	4.30
10/28/19	LRK	No Charge - Finalize 2nd request for production; draft for MSJ.	2.00
10/28/19	KWM	Assist with additional production of documents for attorney review; office conference with L. Killeen regarding same; finalize and bates label documents responsive to Second Set of Request for Production of documents.	1.00
10/29/19	JEF	Work on draft motion for summary judgment, including res judicata element; work on exhibits for closing, including amended and restated agreement; call with counsel for co-defendants to discuss motion and strategies, and work on changes to motion relating to same.	2.00
10/29/19	STG	Review and revision to draft of plea to the jurisdiction and motion for summary judgment.	2.30
10/29/19	LRK	Edit motion for summary judgment; add new grounds to motion; incorporate J de la Fuente Edits; send to counsel; call with Shelby O'Brien; assign paralegal work for Exhibits; send to S. Glaser; work on affidavits;	7.30
10/29/19	GCS	Discuss res judicata arguments with litigation team in support of motion for summary judgment; review research on privity relating to claim preclusion.	.30
10/29/19	KWM	Office conference with L. Killeen to discuss assistance with ordering certified copies of documents from Secretary of State for exhibits to Brief in Support of the Plea to the Jurisdiction and Motion for Summary Judgment; order copies from Secretary of State website; procure documents sent via Secretary of State portal; begin compiling and assisting with exhibits to Brief.	3.00
10/30/19	JEF	Review and revise affidavits and draft motion for summary judgment; follow up with opposing counsel and client contacts regarding closing of exhibits to attach to motion.	2.20
10/30/19	LRK	Review S. Glaser edits on Motion for Summary Judgment; draft business record affidavit for Mike Nelson; send to J. de la Fuente for review; call with Mike Nelson; meet with Mike Nelson, review affidavit, get signature; draft affidavit for Bob Mebane; call with Shelby O' Brian regarding Bob's affidavit, call with Bob Mebane, send to J. de la Fuente for review; draft affidavit for Joe Ginenez; send to J. de la Fuente for review	9.10
10/30/19	GCS	Review and provide comment on draft business records affidavit to support motion	.20

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Date	Arty	Description Of Services Rendered	Hours
		for summary judgment.	
10/31/19	JEF	Work on evidence issues for motion for summary judgment; follow up with team on same; work on strategies for same.	.90
10/31/19	LRK	Finalize affidavit for B. Mebane, send to his counsel, call with his counsel; call B. Mebane, meet and sign affidavit; finalize affidavit of J. Gimenez, call with J. Gimenez; finalize and organize closing documents; call with Friendship counsel; meet with J. Gimenez, sign closing documents and affidavit, send finalized documents to Friendship Counsel; case update to J. de la Fuente; edit motion: incorporate current exhibits and modify language; assign exhibits to paralegal.	9.10
10/31/19	LRK	No Charge - Finalize affidavit for B. Mebane, send to his counsel, call with his counsel; call B. Mebane, meet and sign affidavit; finalize affidavit of J. Gimenez, call with J. Gimenez; finalize and organize closing documents; call with Friendship counsel; meet with J. Gimenez, sign closing documents and affidavit, send finalized documents to Friendship Counsel; case update to J. de la Fuente; edit motion: incorporate current exhibits and modify language; assign exhibits to paralegal.	2.00
10/31/19	LCL	Monthly law clerk time.	6.70
10/31/19	KWM	Continue assistance with cite checking, proof reading and editing Brief in Support of its Plea to the Jurisdiction and Motion for Summary Judgment; office conferences with L. Killeen regarding same; assist with Exhibits to Brief.	3.00

TOTAL PROFESSIONAL SERVICES	\$ 30,884.00
Courtesy Discount	\$ -1,500.00
NET PROFESSIONAL SERVICES	\$ 29,384.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Staff Level	Rate	Hours	Amount	N/C Hr	N/C \$
Michael A Gershon	Principal	300.00	.80	240.00	.00	.00
Jose E de la Fuente	Principal	300.00	25.30	7,590.00	1.00	300.00
Sarah T Glaser	Associate	280.00	25.00	7,000.00	.70	196.00
Lindsay R Killeen	Associate	185.00	74.10	13,708.50	14.00	2,590.00
Gabrielle C Smith	Associate	275.00	.50	137.50	.00	.00
Karen W Mallios	Litigation	135.00	8.20	1,107.00	.00	.00
Audrey A Cooper	Paralegal	130.00	2.80	364.00	.00	.00
Law Clerk	Law Clerk	110.00	6.70	737.00	.00	.00
TOTALS			143.40	\$ 30,884.00	15.70	\$ 3,086.00

DISBURSEMENTS

Lloyd Gosselink Rochelle & Townsend, P.C.

Lloyd Gosselink Rochelle & Townsend, P.C.

Windermere Oaks Water Supply Corporation
TOMA Integrity Litigation
I.D.3870-1-JEF

November 25, 2019
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Date	Description	Amount
10/26/19	Joe de la Fuente Check # - 009906254 Mileage JEF mileage to public comment meeting 10-26-2019.	41.76

TOTAL DISBURSEMENTS \$ 41.76

TOTAL THIS INVOICE \$ 29,425.76

g3 Public Relations
701 N U.S. Hwy 281
Ste. E #192
Marble Falls TX 78654
Phone: 713.478.8034



Creative Energy Communications

Windermere Oaks Water Supply Corp
Joseph Gimenez
P.O. Box 1247
Kingsland TX 78639

Invoice #:	0000607
Date:	August 11, 2019
Balance Due (USD):	\$416.00

To View Your Invoice Online »

1. Go to: <https://g3.freshbooks.com/code>
2. Enter this code: 3r5KZJRGcXvKWvL

Item	Description	Unit Cost (\$)	Quantity	Price (\$)
Public Information Officer Services	PIA request fulfilment since July 10, including 10 new requests for approximately 25 pieces of information, as well as fulfilment of eight requests in June, some of which needed completion in July	416.00	1	416.00
Subtotal:				416.00
Total:				416.00
Amount Paid:				0.00
Balance Due (USD):				\$416.00
Please pay in full by August 31, 2019				
ALL WORK PERFORMED IN UNITED STATES				
PLEASE PAY IN US DOLLARS				

g3 Public Relations
701 N U.S. Hwy 281
Ste. E #192
Marble Falls TX 78654
Phone: 713.478.8034



Creative Energy Communications

Windermere Oaks Water Supply Corp
Water Management Inc
P.O. Box 1247
Kingsland TX 78639

Invoice #:	0000618
Date:	October 10, 2019
Balance Due (USD):	\$416.00

To View Your Invoice Online »

1. Go to: <https://g3.freshbooks.com/code>
2. Enter this code: 3eeMLHQRHvEZ2erB

Item	Description	Unit Cost (\$)	Quantity	Price (\$)
Consulting	Public Information Officer duties in Sept-through Oct 9	416.00	1	416.00
Subtotal:				416.00
Total:				416.00
Amount Paid:				0.00
Balance Due (USD):				\$416.00
Please pay in full by October 31, 2019				
ALL WORK PERFORMED IN UNITED STATES				
PLEASE PAY IN US DOLLARS				

g3 Public Relations
701 N U.S. Hwy 281
Ste. E #192
Marble Falls TX 78654
Phone: 713.478.8034



Creative Energy Communications

Windermere Oaks Water Supply Corp
Water Management Inc
P.O. Box 1247
Kingsland TX 78639

Invoice #:	0000618
Date:	October 10, 2019
Balance Due (USD):	\$416.00

To View Your Invoice Online »

1. Go to: <https://g3.freshbooks.com/code>
2. Enter this code: 3eeMLHQRHvEZ2erB

Item	Description	Unit Cost (\$)	Quantity	Price (\$)
Consulting	Public Information Officer duties in Sept-through Oct. 9	416.00	1	416.00
Subtotal:				416.00
Total:				416.00
Amount Paid:				0.00
Balance Due (USD):				\$416.00
Please pay in full by October 31, 2019				
ALL WORK PERFORMED IN UNITED STATES				
PLEASE PAY IN US DOLLARS				

g3 Public Relations
701 N U.S. Hwy 281
Ste. E #192
Marble Falls TX 78654
Phone: 713.478.8034



Creative Energy Communications

Windermere Oaks Water Supply Corp
Joseph Gimenez
P.O. Box 1247
Kingsland TX 78639

Invoice #:	0000622
Date:	November 11, 2019
Balance Due (USD):	\$416.00

To View Your Invoice Online »

1. Go to <https://g3.freshbooks.com/code>
2. Enter this code: Z4tJMUH3WnpRRB

Item	Description	Unit Cost (\$)	Quantity	Price (\$)
Consulting	Public Information Officer responsibilities for October 11 - November 10.	416.00	1	416.00
Subtotal:				416.00
Total:				416.00
Amount Paid:				0.00
Balance Due (USD):				\$416.00
Please pay in full by November 20, 2016				
ALL WORK PERFORMED IN UNITED STATES				
PLEASE PAY IN US DOLLARS				

g3 Public Relations
701 N U.S. Hwy 281
Ste. E #192
Marble Falls TX 78654
Phone: 713.478.8034



Creative Energy Communications

Windermere Oaks Water Supply Corp
Joseph Gimenez
P.O. Box 1247
Kingsland TX 78639

Invoice #:	0000631
Date:	December 12, 2019
Balance Due (USD):	\$416.00

To View Your Invoice Online »

1. Go to: <https://g3.freshbooks.com/code>
2. Enter this code: 7W4NicZA3whMnMe

Item	Description	Unit Cost (\$)	Quantity	Price (\$)
Consulting	Service as Public Information Officer, Nov. 11 through Dec. 10.	416.00	1	416.00
Subtotal:				416.00
Total:				416.00
Amount Paid:				0.00
Balance Due (USD):				\$416.00
Please pay in full by December 31, 2019				
ALL WORK PERFORMED IN UNITED STATES				
PLEASE PAY IN US DOLLARS				

**Workpaper MN-2 is
VOLUMINOUS and being
provided in electronic file-
format on CD.**