



determine the legal work I performed in this matter to defend the Plaintiff's claims against the Defendants.

5. Based upon my review of the records, I hereby attest that the following list accurately represents the professional services I performed in relation to defending this action and obtaining the dismissal, and the time spent on those tasks. I further attest that I believe the services performed were reasonable and necessary for the defense of this matter.

<u>Date</u>	<u>Work Performed</u>	<u>Time Spent</u>	<u>Fees Incurred</u>
2/21/20	Telephone conference with John Duval to discuss Stacy Lynne's new lawsuit. Reviewed Complaint.	1.1	203.50
2/24/20	Sent email to Stacy Lynne requesting additional time to file Answer. Drafted and filed motion for enlargement of time with proposed order.	.9	166.50
2/25/20	Exchanged emails with City Attorney's office regarding scheduling a meeting. Reviewed order granting motion for enlargement of time.	.5	92.50
3/16/20	Review of Complaint and prior lawsuit, briefing and orders. Office conference with John Duval and Chris Van Hall regarding our planned motion to dismiss. Met with Noah Beals.	2.1	388.50
3/23/20	Reviewed caselaw on willful and wanton exception. Emailed Stacy Lynne to request additional time for response. Received consent to file Motion for Enlargement of Time. Filed same.	1.1	203.50
3/24/20	Received and reviewed order granting extension for Answer.	.2	37.00
4/2/20	Researched case law on claim preclusion. Began drafting motion to dismiss.	1.9	351.50
4/5/20	Continued researching case law and drafting Motion to Dismiss Amended Complaint.	2.5	462.50
4/6/20	Continued drafting Motion to Dismiss Amended Complaint.	5	925.00
4/7/20	Made additional revisions to Motion to Dismiss. Forwarded to City Attorney's office for review and revisions. Drafted Proposed Order for Motion to Dismiss. Reviewed proposed changes made by City Attorney's office. Revised Motion and Order. Sent new copies to client for review. Received final copies with revisions. Filed the same. Sent service copy to Stacy Lynne.	4.4	814.00
4/9/20	Exchanged emails with Stacy Lynne to discuss dismissing the City as a defendant.	.4	74.00
4/28/20	Drafted Motion to Dismiss City. Reviewed and then sent revised copy to City Attorney's Office for review.	2.2	407.00
4/29/20	Revised Motion to Dismiss City per input of City Attorney's office. Drafted Proposed Order. Filed same and forwarded copy to City.	.9	166.50
5/5/20	Reviewed Order granting dismissal. Sent update emails to clients with copy of Order.	.7	129.50
5/26/20	Received and reviewed Order and Judgment dismissing case. Sent update email to City.	.4	74.00
6/8/20	Drafted Motion to Assess Attorney's Fees. Prepared Affidavit of Attorney's Fees and costs. Forwarded same to client for review.	1.5	277.50
	<b>TOTAL FEES</b>		<b>\$4,773.00</b>

6. Accordingly, as outlined in detail above, legal fees in the amount of \$4,773.00 have been incurred for my professional services relating to the defense in this matter.

**BILL OF COSTS**

The following costs have been incurred in the defense of this matter:

2/24/20	Court processing and recovery fee	\$6.00
3/23/20	Court processing and recovery fee	\$6.00
4/7/20	Court processing and recovery fee	\$14.44
4/29/20	Court processing and recovery fee	\$6.00
	<b>TOTAL</b>	<b>\$32.44</b>

Further, Affiant sayeth naught.



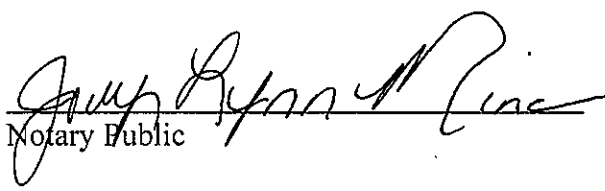
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ANDREW W. CALLAHAN

STATE OF COLORADO    )  
                                  )  
                                  )    ss.  
COUNTY OF LARIMER    )

Subscribed and sworn to before me this 11<sup>th</sup> day of June, 2020, by Andrew W. Callahan.

Witness my hand and official seal.

My commission expires: March 25, 2023.

  
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Notary Public

**JODY LYNN MINCH  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 19914004077  
MY COMMISSION EXPIRES MARCH 25, 2023**