

115.4

PATRICK BUCHANAN V. TOWN OF GREENFIELD

Matter ID: 16354-150792

Date Opened: 11/23/2015

LEGAL FEES

Date	Initials	Description	Hours	Rate	Amount
11/20/2015	TJR	Conference with Mr. Buchanan	2.00	425.00	850.00
11/24/2015	TJR	Review file in detail	1.50	425.00	637.50
11/25/2015	JAD	Fee agreement and Letter to client	0.30	95.00	28.50
11/30/2015	TJR	Telephone conference with Mr. Buchanan re status.	0.20	425.00	85.00
2/23/2016	TJR	Telephone conference with client re status.	0.30	425.00	127.50
2/25/2016	TJR	Work on File	1.00	425.00	425.00
3/28/2016	TJR	Draft MCAD Complaint	2.50	425.00	1,062.50
3/29/2016	TJR	Work on MCAD Complaint	1.00	425.00	425.00
3/30/2016	ECM	Prepare Exhibit A , cover sheet for MCAD, and review file for information.	1.25	95.00	118.75
3/31/2016	TJR	Work on MCAD Complaint	2.00	425.00	850.00
4/4/2016	TJR	Work on Complaint, office conference Buchanan	3.00	425.00	1,275.00
4/5/2016	TJR	Finalize Complaint, file with MCAD	1.00	425.00	425.00
5/19/2016	TJR	Review file re time-line	1.00	425.00	425.00
6/6/2016	TJR	Review Defendants response, send to Mr. Buchanan.	0.40	425.00	170.00
6/8/2016	TJR	Office conference with Mr. Buchanan regarding status	1.50	425.00	637.50
7/20/2016	TJR	Review file, prepare for Investigative Conference	2.50	425.00	1,062.50
7/21/2016	TJR	Preparation for and representation at Investigative Conference	2.50	425.00	1,062.50
7/22/2016	TJR	Review first amendment/confederate flag cases/public employees.	2.00	425.00	850.00
7/25/2016	JAD	Legal research government employee posting Confederate flag on facebook (Duke v Hamil 977 F.Supp.2d 1291 - police officer); (Buker v. Howard County - fireman)	2.30	95.00	218.50
7/26/2016	TJR	Begin draft of Reply for Position Statement	1.50	425.00	637.50
7/26/2016	JAD	Legal research displaying confederate flag issue	0.50	95.00	47.50

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7/27/2016	TJR	Work on file, reply memo to MCAD, continue legal research.	2.50	425.00	1,062.50
7/29/2016	TJR	Work on Reply Statement	2.00	425.00	850.00
8/12/2016	TJR	Telephone conference with investigator, draft letter to Mr Marotta at MCAD	1.50	425.00	637.50
8/15/2016	TJR	Revise letter to Mr. Marotta at MCAD.	0.50	425.00	212.50
9/21/2016	TJR	Inquiry from Mr. Marotta at MCAD.	0.40	425.00	170.00
9/22/2016	TJR	Work on Response to Mr. Marotta inquiry, file with MCAD	1.50	425.00	637.50
11/7/2016	TJR	Telephone conference with client, work on pleadings.	1.00	425.00	425.00
11/18/2016	TJR	Telephone conference with Mr. Marotta at MCAD	0.50	425.00	212.50
12/29/2016	TJR	Prepare to file Notice of Withdrawal with MCAD	0.50	425.00	212.50
1/30/2017	TJR	Work on Superior Court Complaint.	1.50	425.00	637.50
1/30/2017	JAD	Prepare Buchanan's portion of Complaint v. Town of Greenfield	1.40	95.00	133.00
2/1/2017	TJR	Legal research re venue for filing.	1.00	425.00	425.00
2/3/2017	TJR	Revise Superior Court Complaint regarding Buchanan.	2.00	425.00	850.00
2/14/2017	TJR	Work on Superior Court Complaint.	3.00	425.00	1,275.00
2/15/2017	TJR	Work on Complaint and forward to client.	0.50	425.00	212.50
2/23/2017	TJR	Finalize and file Complaint.	4.00	425.00	1,700.00
2/28/2017	JAD	Prepare Summons to Town of Greenfield for service of Complaint	0.20	95.00	19.00
3/2/2017	JAD	Letter to Franklin County Sheriff for service of Complaint on Town Clerk, Town of Greenfield	0.30	95.00	28.50
3/10/2017	TJR	Work on discovery requests to Town	1.50	425.00	637.50
3/16/2017	TJR	Email with Defense Counsel re Answer	0.20	425.00	85.00
3/21/2017	TJR	Work on Buchanan discovery requests to Defendant.	1.50	425.00	637.50
3/30/2017	JAD	Telephone conference with Lisa at Franklin County Sheriff's department for original Summons with Return of Service	0.10	95.00	9.50
4/5/2017	TJR	Work on Buchanan discovery requests.	2.50	425.00	1,062.50

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4/7/2017	TJR	Work on Buchanan discovery requests.	2.00	425.00	850.00
4/11/2017	JAD	Telephone conference with and letter to Franklin County Sheriff re: return of service on Summons	0.30	95.00	28.50
4/13/2017	TJR	Finalize Buchanan discovery.	1.00	425.00	425.00
5/16/2017	JAD	Input Defendant Town of Greenfield's discovery requests to P. Buchanan into ProLaw to begin answering discovery.	0.30	95.00	28.50
6/2/2017	TJR	Conference with Pat Buchanan, work on discovery answers.	5.00	425.00	2,125.00
6/9/2017	TJR	Work on discover issues.	2.00	425.00	850.00
6/12/2017	TJR	Work on Buchanan discovery responses.	1.20	425.00	510.00
7/5/2017	JAD	Prepare 9C letter to defense counsel re: overdue document response and answers to interrogatories to plaintiffs	0.30	95.00	28.50
8/7/2017	TJR	Work on Buchanan discovery responses.	1.50	425.00	637.50
8/15/2017	JAD	Letter to defense counsel with Patrick Buchanan's Answers to Defendant's First Set of Interrogatories	0.30	95.00	28.50
8/15/2017	JAD	Update pleading index with recently filed documents	0.10	95.00	9.50
8/28/2017	TJR	Review Greenfield's Discovery Responses.	1.20	425.00	510.00
8/30/2017	LAP	Assemble exhibits to defendant's response to plaintiff Buchanan's request for production of documents per J. DeCosmo.	1.70	95.00	161.50
9/6/2017	TJR	Prepare Case Management Statement.	1.50	425.00	637.50
9/7/2017	TJR	Case Management Conference in Hampshire Superior Court	2.00	425.00	850.00
9/14/2017	TJR	Work on file; review damages.	1.00	425.00	425.00
9/18/2017	TJR	Office conference with client re demand.	1.00	425.00	425.00
9/29/2017	TJR	Review Town's discovery responses.	2.00	425.00	850.00
10/2/2017	TJR	Work on discovery review; ongoing revision of Town's discovery response.	1.20	425.00	510.00

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Date	Initials	Description	Hours	Rate	Amount
10/3/2017	TJR	Review documents produced by Town.	2.00	425.00	850.00
10/5/2017	TJR	Review records produced by Town.	1.00	425.00	425.00
10/19/2017	TJR	Work on document review; review of Town's discovery response.	2.00	425.00	850.00
10/20/2017	TJR	Finish revision of Town's discovery document review.	1.50	425.00	637.50
11/10/2017	TJR	Work on file.	2.00	425.00	850.00
2/26/2018	JAD	Prepare draft Motion to Extend Discovery Deadline to June 30, 2018 for Atty. T. Ryan	0.40	125.00	50.00
2/27/2018	TJR	Work on file/demand.	1.00	425.00	425.00
3/1/2018	TJR	Office conference with client, Pat Buchanan, re status.	2.00	425.00	850.00
3/2/2018	TJR	Work on discovery, demand letter.	1.00	425.00	425.00
3/29/2018	TJR	Schedule deposition of Chief	0.60	425.00	255.00
4/3/2018	TJR	Begin preparing for Chief Haigh's deposition	2.50	425.00	1,062.50
4/6/2018	TJR	Work on discovery preparation	1.00	425.00	425.00
4/12/2018	TJR	Deposition Preparation/Chief Haigh.	4.00	425.00	1,700.00
4/13/2018	TJR	Deposition Preparation/Chief Haigh.	4.00	425.00	1,700.00
4/16/2018	TJR	Work on deposition preparation	6.00	425.00	2,550.00
4/17/2018	TJR	Prepare for and conduct deposition of Chief Haigh, telephone conference with client as to status	6.50	425.00	2,762.50
4/18/2018	TJR	Draft second request for documents for Buchanan; advise clients as to deposition date.	1.00	425.00	425.00
4/23/2018	TJR	Review file as to future discovery; review deposition transcript	1.50	425.00	637.50
5/2/2018	TJR	Telephone conference with client, Pat Buchanan, re: status	0.30	425.00	127.50
5/17/2018	TJR	Email with counsel re: discovery schedule	0.30	425.00	127.50
5/22/2018	TJR	Prepare Deposition Notices for Mayor Martin and Sgt. McCarthy	0.50	425.00	212.50
5/23/2018	JIO	Draft deposition notices (2) and letter to counsel re: same	0.50	125.00	62.50
5/25/2018	TJR	Work on file/revise documents for Buchanan deposition.	1.50	425.00	637.50
5/30/2018	TJR	Deposition preparation for Pat Buchanan	3.00	425.00	1,275.00

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6/5/2018	TJR	Telephone conference/emails re: depositions	0.40	425.00	170.00
6/12/2018	JIO	Receive/review/schedule deposition notice; correspondence to client re: same	0.20	125.00	25.00
6/18/2018	TJR	Work on depositions of Town	0.50	425.00	212.50
6/20/2018	TJR	Review/draft Confidentiality Order.	0.50	425.00	212.50
6/26/2018	TJR	Work on scheduling depositions	1.00	425.00	425.00
6/27/2018	JAD	Email to Philbin & Associates with new dates for depositions of Mayor Martin and Sgt. McCarthy	0.20	125.00	25.00
6/27/2018	JAD	Prepare Re-Notice of Deposition for Mayor William Martin and Re-Notice of Deposition for Sgt. Daniel McCarthy	0.30	125.00	37.50
6/27/2018	TJR	Work on scheduling depositions	5.00	425.00	2,125.00
7/12/2018	TJR	Work on Buchanan document production	1.00	425.00	425.00
7/25/2018	TJR	Work on file/Buchanan discovery status	1.00	425.00	425.00
7/27/2018	TJR	Work on Buchanan discovery responses	1.00	425.00	425.00
7/30/2018	TJR	Correspondence with counsel regarding document production.	0.20	425.00	85.00
8/7/2018	JIO	Receipt and review of Pretrial Conference Notice from Court, update file and schedule	0.20	125.00	25.00
8/7/2018	TJR	Begin deposition preparation for Mayor Martin and Sgt. McCarthy	2.00	425.00	850.00
8/8/2018	TJR	Preparation for deposition of Mayor Martin	1.00	425.00	425.00
8/9/2018	TJR	Prepare for Mayor's deposition	2.50	425.00	1,062.50
8/10/2018	TJR	Work on deposition preparation, review additional documents from Town	4.00	425.00	1,700.00
8/13/2018	TJR	Work on deposition preparation/Mayor Martin.	2.00	425.00	850.00
8/14/2018	TJR	Work on scheduling depositions	0.50	425.00	212.50
8/15/2018	TJR	Begin review of Police Department's IA's reports regarding Buchanan.	2.00	425.00	850.00
8/16/2018	JIO	Begin re-noticing depositions; email with Atty. T. Ryan re: same	0.40	125.00	50.00

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