



AlaFile E-Notice

02-CV-2023-901332.00

Judge: MICHAEL A YOUNGPETER

To: PATTON HAHN
phahn@bakerdonelson.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

SYNOVUS CORPORATE TRUST V. WATER WORKS AND SEWER BOARD OF CITY OF PRIC
02-CV-2023-901332.00

The following matter was FILED on 9/20/2024 2:57:07 PM

O001 JOHN S YOUNG JR LLC

MOTION FOR LEGAL FEES AND EXPENSES

[Filer: HAHN WILLIAM PATTON]

Notice Date: 9/20/2024 2:57:07 PM

SHARLA KNOX
CIRCUIT COURT CLERK
MOBILE COUNTY, ALABAMA
CIRCUIT CIVIL DIVISION
205 GOVERNMENT STREET 9TH FLOOR, N TOWER
MOBILE, AL, 36644

251-574-8420

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

SYNOVUS CORPORATE TRUST,)	
)	
Plaintiff,)	
)	
v.)	Case No. 02-CV-2023-901332.00
)	
WATER WORKS AND SEWER BOARD)	
OF CITY OF PRICHARD,)	
)	
Defendant.)	

RECEIVER’S MEMORANDUM IN RESPONSE TO AMENDED MOTION FOR LEGAL FEES AND EXPENSES FILED BY HELMSING, LEACH, HERLONG, NEWMAN & ROUSE ON BEHALF OF THE WATER WORKS AND SEWER BOARD OF THE CITY OF PRICHARD

COMES NOW John S. Young Jr. LLC, Court-appointed Receiver (“Receiver”) of the Prichard Water Works and Sewer Board of the City of Prichard (“PWWSB”), and files this memorandum in response to the Amended Motion for Legal Fees and Expenses filed by the Helmsing, Leach, Herlong, Newman & Rouse, PC law firm (the “Helmsing Firm”) on behalf of PWWSB. Since it appears on its face that the Amended Motion supplants the initial motion filed by the Helmsing Firm, the Receiver will not file a separate response to the initial motion. The Receiver states as follows in response to the Amended Motion:

1. On January 4, 2024, the Court entered an Order authorizing and directing the Receiver to pay Defendant’s legal fees and expenses in connection with the pending appeal only.
2. After the filing of the initial motion by the Helmsing Firm, the Receiver, through counsel, requested unredacted copies of all invoices that were listed as due and payable.

3. In response, the Helmsing Firm provided the invoice summary which is attached as Exhibit A to the Amended Motion. The summary reflects that the Helmsing Firm is seeking \$83,349.54 in fees and expenses for work that is “unrelated” to the appeal filed by PWWSB and \$119,924.45 in fees and expenses for work “related” to the appeal filed by PWWSB.

4. Although the Amended Motion did not attach the invoices which are listed in the summary, redacted copies were furnished counsel for the Receiver. Copies of the redacted invoices in question are attached hereto as Exhibit A.

5. With respect to the invoices that the Defendant contends are related to the appeal, the Receiver is not able to confirm that the work is exclusively related to the appeal due to the redactions that have been made. Further, the time entries are insufficient in that they do not identify the amount of time incurred on each entry by each timekeeper.

6. Further, in January of 2023, the Receiver, through counsel, requested Mark Parnell to provide a budget estimate for the cost of the appeal he expected PWWSB would incur. Mr. Parnell estimated the cost of the appeal at \$80,000. *See* Exhibit B. When Mr. Parnell’s fee request for the appeal (\$16,146.00) is combined with the Helmsing Firm’s appellate fee request (\$119,924.91), the total that is being sought is \$136,070.91, which exceeds the budget estimate by approximately \$56,000.

7. The Receiver understands that the Defendant is attempting to preserve its attorney client privilege related to the descriptions of work in the Helmsing invoices by submitting redacted copies; however, the Receiver simply is not in a position to approve the invoices without further direction from the Court. One option is for the Defendant to submit unredacted copies of the invoices under seal for the Court to inspect in camera and then direct the Receiver on the amount to pay for the work related to the appeal of the Receiver Order.

8. With respect to the invoices for work not related to the appeal of the Receiver Order, the Receiver needs direction from the Court on whether the invoices should be paid and in what amount. The fact remains that the operational revenue generated from the PWWSB water and sewer systems is still not sufficient to meet all normal operating expenses or to pay the amounts due the bond holders. There are simply not enough funds to pay the invoices for non-appeal related services.

WHEREFORE, premises considered, the Receiver requests that the Court give it direction on whether it is required to pay non-appeal related fees and expenses (and if so, the amount) and the amount of the appeal-related fees and expenses to pay.

Respectfully submitted this 20th day of September, 2024.



Joe A. Conner, Admitted *pro hac vice*
Counsel for the Receiver

OF COUNSEL:

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
1901 Sixth Avenue North Suite 2600
Birmingham, Alabama 35203
Telephone (205) 328-0480
Facsimile (205) 322-8007
jconner@bakerdonelson.com
phahn@bakerdonelson.com

CERTIFICATE OF SERVICE

I hereby certify that on September 20th, 2024, the foregoing has been sent via this Court's electronic filing system to all counsel of record:

Jeffery J. Hartley
HELMSING LEACH
Post Office Box 2767
Mobile, AL 36652
jjh@helmsinglaw.com

Lue E. Sullivan, Sr.
2204 Smiley Lane
Prichard, AL 36610
Sullivanlue79@gmail.com

K. Mark Parnell
Jeffery J. Hartley
Keri R. Coumanis
Rachel C. Buddrus
PARNELL THOMPSON, LLC
200 Office Park Drive, Suite 328
Birmingham, AL 35223
parnell@ptlawllc.com
jjh@helmsinglaw.com
krc@helmsinglaw.com
rbuddrus@helmsinglaw.com

Doug Jones
Cissy Jackson
ArentFox Schiff LLP
1717 K Street NW
Washington, DC 20006
doug.jones@arentfox.com
cissy.jackson@arentfox.com

Micah West
SOUTHERN POVERTY LAW CENTER
400 Washington Avenue
Montgomery, AL 36014
micah.west@aplcenter.org



OF COUNSEL

Exhibit A

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 130747

8/22/2023

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/Synovus Bank

Client No. 10840
Matter No. 24613

Professional Services Rendered for the Period Ending July 31, 2023:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>	<u>HOURS</u>
7/5/2023	Receipt and review of initial complaint from Synovus (.40); [REDACTED] Mr. Ross (.20); extended telephone call with Mr. Ross (.70); initial research [REDACTED] (1.10).	JJH	2.40
7/6/2023	Research [REDACTED] (.70); several emails from Mr. Ross regarding [REDACTED] (1.30); 1:00 p.m. conference call with Mr. Ross, Synovus counsel and others (1.30); 3:30 conference call with Mr. Ross, Mr. Lewis and KKR Investment Bankers (1.10).	JJH	4.40
7/7/2023	Continued work on [REDACTED].	JJH	0.60
7/7/2023	Some work on [REDACTED].	JJH	0.30
7/7/2023	Talked to Mr. Hartley about [REDACTED].	LBC	0.00
7/7/2023	Review of and prepare documents for review by Mr. Hartley.	KTM	0.90
7/10/2023	Research [REDACTED] question at direction of Mr. Ross.	JJH	1.20
7/10/2023	Assist Mr. Hartley in [REDACTED].	LBC	2.40
7/10/2023	Review of and prepare documents for review by Mr. Hartley.	KTM	1.20
7/11/2023	Back and forth with Mr. Ross [REDACTED].	JJH	2.20
7/12/2023	Three to four emails with Mr. Ross on [REDACTED] (.30); work on the Chapter 9 qualification question (.70).	JJH	1.00
7/12/2023	Spoke with [REDACTED] about [REDACTED].	LBC	0.00
7/13/2023	Back and forth with Mr. Ross and coordinate filing notice of appearance.	JJH	0.20
7/13/2023	Prepare and e-file notice of appearance for Mr. Hartley in state court matter (.30).	DWC	0.30
7/14/2023	Telephonic meeting with co-counsel regarding [REDACTED] (.50); receipt and review of Mr. Parnell's [REDACTED] (.10).	JJH	0.60

7/17/2023	Work through [REDACTED]; found and analyze [REDACTED].	LBC	0.90
7/18/2023	Back and forth with Mr. Ross and Mr. Parnell (.20); group conference call (.40); receipt and review of motion to continue and comment on same and scheduling motion and follow up emails (.30).	JJH	0.90
7/18/2023	Continue research of [REDACTED].	LBC	1.90
7/19/2023	Back and forth with Mr. Ross' office 2-3 times (.20); [REDACTED] telephone call with Mr. Ross (.20).	JJH	0.40
7/19/2023	Finished going through materials [REDACTED].	LBC	0.00
7/20/2023	Eight to ten emails with Mr. Ross, Ms. Neese, Mr. Parnell and Ms. Jackson.	JJH	0.40
7/21/2023	Telephone call with co-counsel and Mr. Underwood.	JJH	0.50
7/25/2023	Prepare for and telephone call with Synovus counsel (.30); follow-up with co-counsel and Mr. Underwood (.60); scheduling hearing with Judge Youngpeter (.60); follow-up with Mr. Parnell and Mr. Ross and many others (.90).	JJH	2.40
7/26/2023	Continued work on [REDACTED] (.20); research [REDACTED] (1.50); emails back and forth with Mr. Lewis (.10).	JJH	1.80
7/26/2023	Further [REDACTED], organized my research, and meeting(.2.1) to discuss post-meeting follow up research.	LBC	2.40
7/27/2023	Research previous [REDACTED] on PACER.	LBC	0.60
7/28/2023	Looked at [REDACTED]	LBC	0.00
7/31/2023	Further research on [REDACTED]	LBC	2.70
	Total		32.60
			\$8,673.00

**SUMMARY OF SERVICES
 ATTORNEY**

		<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
JJH	Jeffery J. Hartley	19.30	325.00	6,272.50
DWC	Diane W. Clausen	0.30	160.00	48.00
KTM	Kathy T. Mallette	2.10	160.00	336.00
LBC	Lisee B. Conwell	10.90	185.00	2,016.50

Prichard Water Works and Sewer Board
Prichard Water Works/Synovus Bank
10840 24613

8/22/2023
130747
Page 3

EXPENSES
DESCRIPTION

AMOUNT

Alacourt service charge for July 2023.

3.30

Total EXPENSES

\$3.30

Total

\$8,676.30

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 131189

9/22/2023

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/Synovus Bank

Client No. 10840
Matter No. 24613

Professional Services Rendered for the Period Ending August 31, 2023:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>	<u>HOURS</u>
8/1/2023	Continued work on [REDACTED] and next steps.	JJH	0.90
8/1/2023	Talked with Mr. Hartley about [REDACTED] [REDACTED]	LBC	0.00
8/2/2023	Looked at an argument Mr. Hartley [REDACTED] [REDACTED].	LBC	0.00
8/3/2023	Continued work on [REDACTED] [REDACTED] (1.0); several emails back and forth with Mr. Ross and Mr. Parnell (.10).	JJH	1.10
8/3/2023	Talked with [REDACTED] [REDACTED].	LBC	0.00
8/4/2023	[REDACTED] telephone call with Mr. Ross, Mr. Parnell and others (1.0); follow-up emails and texts (.20).	JJH	1.20
8/8/2023	Research - [REDACTED] [REDACTED]	LBC	0.00
8/14/2023	Eight to ten emails [REDACTED] [REDACTED]	JJH	0.80
8/15/2023	Conference call with all co-counsel [REDACTED].	JJH	0.50
8/16/2023	Work on [REDACTED].	JJH	0.60
8/17/2023	Eight to ten emails with co-counsel (.40); telephone call with Mr. Ross (.10).	JJH	0.50
8/17/2023	Office conference with Mr. Hartley regarding [REDACTED] [REDACTED].	JCP	0.20
8/18/2023	Office conference with Mr. Hartley regarding [REDACTED] [REDACTED].	JCP	0.40
8/18/2023	Review [REDACTED] and [REDACTED] research regarding [REDACTED].	JCP	1.80

8/18/2023	Research regarding [REDACTED] [REDACTED].	JCP	0.80
8/18/2023	Receipt and review of email from co-counsel [REDACTED] (.10); email to Mr. Parnell (.10); [REDACTED] telephone call with Mr. Parnell (.20); coordinate research [REDACTED] (.40); telephone calls with Mr. Ross [REDACTED] (1.0).	JJH	1.80
8/18/2023	Review email from Mr. Hartley regarding [REDACTED] [REDACTED].	RCP	0.10
8/18/2023	Office conference with Ms. Coumanis regarding [REDACTED] [REDACTED].	JCP	0.20
8/21/2023	Work on response to [REDACTED] and back and forth with Mr. Parnell (.40); receipt and review of [REDACTED] [REDACTED] (.10); coordinate [REDACTED] research (.10).	JJH	0.60
8/21/2023	Telephone call with in-house lawyer for MAWSS regarding [REDACTED] [REDACTED].	JCP	0.30
8/21/2023	Meet with Mr. Hartley regarding [REDACTED] [REDACTED].	RCP	0.20
8/21/2023	Review [REDACTED] and [REDACTED].	JCP	0.80
8/22/2023	Some work on [REDACTED].	JJH	0.20
8/22/2023	Review and draft [REDACTED].	JCP	0.20
8/23/2023	Examine case file [REDACTED] [REDACTED].	RCP	0.10
8/25/2023	Back and forth with Mr. Parnell [REDACTED].	JJH	0.30
8/28/2023	Receipt and review of [REDACTED] and 2-3 emails with Mr. Parnell.	JJH	0.40
8/28/2023	Research regarding [REDACTED] [REDACTED].	JCP	1.20
8/29/2023	Review [REDACTED] and research [REDACTED] [REDACTED].	KRC	1.50
8/29/2023	Research [REDACTED].	KRC	1.00
8/29/2023	[REDACTED] telephone call with Mr. Parnell (.50); meeting to coordinate [REDACTED] [REDACTED] (.60).	JJH	1.10

8/29/2023	Office conference with Mr. Hartley regarding [REDACTED]	JCP	0.20
8/29/2023	Legal research regarding [REDACTED] [REDACTED].	JCP	0.80
8/29/2023	Review correspondence [REDACTED] [REDACTED].	RCP	0.30
8/29/2023	Examine [REDACTED] records to [REDACTED] [REDACTED].	RCP	0.30
8/29/2023	Correspond and confer with Ms. Coumanis regarding [REDACTED] [REDACTED].	RCP	0.20
8/29/2023	Confer with Mr. Hartley regarding [REDACTED] [REDACTED].	RCP	0.30
8/30/2023	Research [REDACTED] concerning [REDACTED] [REDACTED].	KRC	0.30
8/30/2023	Back and forth with Mr. Parnell (.10); work on [REDACTED] [REDACTED] (.20).	JJH	0.30
8/30/2023	Office conference with Mr. Hartley.	JCP	0.10
8/30/2023	Office conference with Ms. Coumanis regarding [REDACTED] [REDACTED].	JCP	0.20
8/30/2023	Legal research regarding [REDACTED].	JCP	0.40
8/30/2023	Meet with Mr. Hartley regarding [REDACTED].	RCP	0.20
8/30/2023	Correspond with Mr. Parnell regarding [REDACTED] [REDACTED].	RCP	0.10
8/30/2023	Examine [REDACTED] and [REDACTED] from Mr. Parnell.	RCP	0.50
8/31/2023	Back and forth with Mr. Parnell (.10); back and forth with Mr. Parnell and Ms. Jackson a few times trying to schedule depositions (.20); conference call with Mr. Parnell, Mr. Pipes and Ms. Palmer (1.0); post-conference call work on [REDACTED] (.30).	JJH	1.60
8/31/2023	Review correspondence regarding [REDACTED] [REDACTED].	RCP	0.10
8/31/2023	Conference call with Mr. Hartley, Mr. Parnell, and Mr. Pipes to discuss [REDACTED].	RCP	1.00
8/31/2023	Correspond with Ms. Coumanis regarding [REDACTED] [REDACTED].	RCP	0.10
8/31/2023	Review file regarding [REDACTED].	JCP	0.60
8/31/2023	Review [REDACTED] with Mr. Parnell, Mr. Hartley, and Mrs. Palmer regarding [REDACTED].	JCP	1.00

Prichard Water Works and Sewer Board
Prichard Water Works/Synovus Bank
10840 24613

9/22/2023
131189
Page 4

Total

27.40

\$8,432.50

SUMMARY OF SERVICES

ATTORNEY

	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
JJH Jeffery J. Hartley	11.90	325.00	3,867.50
JCP J. Casey Pipes	9.20	325.00	2,990.00
KRC Keri R. Coumanis	2.80	250.00	700.00
LBC Lisee B. Conwell			0.00
RCP Rachel C. Palmer	3.50	250.00	875.00

EXPENSES

DESCRIPTION

AMOUNT

AT&T Teleconference Services - Conference call on 07/18/2023. 16.75

Alabama Secretary of State - Obtaining copies of business entity records. 31.50

Westlaw research for August 2023. 73.27

Alacourt service charge for August 2023. 25.90

Total EXPENSES

\$147.42

Total

\$8,579.92

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 131584

10/16/2023

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/Synovus Bank

Client No. 10840
Matter No. 24613

Professional Services Rendered for the Period Ending September 30, 2023:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>	<u>HOURS</u>
9/1/2023	Some work on [REDACTED] (.20); some work on [REDACTED] [REDACTED] (.20); receipt and review [REDACTED] (.10).	JJH	0.50
9/1/2023	Examine and analyze the [REDACTED].	RCP	1.50
9/1/2023	Correspond with Ms. Coumanis, Mr. Pipes and Mr. Hartley regarding [REDACTED].	RCP	0.10
9/1/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.20
9/1/2023	Review [REDACTED].	JCP	0.80
9/5/2023	Eight to twelve emails with Mr. Parnell and Mr. Underwood (.50); receipt and review [REDACTED] (.10)	JJH	0.60
9/5/2023	Review and comment on [REDACTED].	RCP	0.50
9/5/2023	Correspond with Mr. Parnell, Mr. Hartley and Mr. Pipes regarding [REDACTED].	RCP	0.10
9/6/2023	Review [REDACTED] and [REDACTED] with Mr. Hartley regarding [REDACTED].	JCP	0.50
9/6/2023	Back and forth with Mr. Parnell (.10); extended telephone call with Mr. Parnell (.20); continued research on [REDACTED] (.80).	JJH	1.10
9/7/2023	Continued research on [REDACTED].	JJH	1.10
9/7/2023	Examine and analyze [REDACTED] regarding [REDACTED].	RCP	0.50
9/8/2023	Research cases concerning [REDACTED].	KRC	2.00
9/11/2023	Back and forth with Mr. Parnell.	JJH	0.10

9/11/2023	Continued work on [REDACTED].	JJH	0.40
9/11/2023	Read and review [REDACTED] concerning [REDACTED]; review [REDACTED].	KRC	1.90
9/11/2023	Research [REDACTED] concerning [REDACTED].	KRC	0.50
9/12/2023	Status telephone call with co-counsel regarding [REDACTED] [REDACTED] (.20); to meeting with Water Works and brief Board Executive session.	JJH	1.40
9/12/2023	[REDACTED] law and secondary sources regarding [REDACTED] [REDACTED].	RCP	1.20
9/12/2023	Review of [REDACTED] and [REDACTED] [REDACTED].	KTM	1.20
9/13/2023	Emails back and forth with Mr. Parnell (.20); continued work on [REDACTED] [REDACTED] (1.70).	JJH	1.90
9/13/2023	Correspond with Mr. Parnell regarding [REDACTED] [REDACTED].	RCP	0.10
9/13/2023	Review email from Ms. Coumanis regarding [REDACTED] [REDACTED].	RCP	0.10
9/13/2023	[REDACTED] case law and secondary sources regarding [REDACTED] [REDACTED].	RCP	1.50
9/13/2023	Prepare [REDACTED] [REDACTED].	RCP	1.20
9/13/2023	Meet with Ms. Coumanis regarding [REDACTED] [REDACTED].	RCP	0.30
9/13/2023	Identify [REDACTED] and [REDACTED] [REDACTED].	KRC	0.70
9/13/2023	Review [REDACTED] [REDACTED].	KRC	1.90
9/14/2023	Work on [REDACTED] (.50); work on [REDACTED] [REDACTED] (.20); continued research on [REDACTED] (1.30); group call with [REDACTED] (1.10); 6-8 emails regarding [REDACTED] (.40).	JJH	3.50
9/14/2023	Meet with Mr. Hartley regarding [REDACTED] [REDACTED].	RCP	1.00

9/14/2023	Examine [REDACTED] [REDACTED] regarding [REDACTED] and correspond with Mr. Parnell, Mr. Hartley, Ms. Coumanis and Mr. Pipes regarding [REDACTED].	RCP	0.30
9/14/2023	Correspond with Ms. Coumanis regarding [REDACTED].	RCP	0.10
9/14/2023	[REDACTED] and [REDACTED] Alabama case law [REDACTED].	RCP	0.70
9/14/2023	Prepare [REDACTED] and amended [REDACTED].	RCP	0.30
9/14/2023	Correspond with Mr. Hartley, Ms. Coumanis, Mr. Parnell, and Mr. Ross regarding [REDACTED].	RCP	0.20
9/14/2023	[REDACTED] per Mr. Hartley to [REDACTED].	RCP	0.40
9/14/2023	Review [REDACTED] and [REDACTED].	KRC	1.50
9/14/2023	Confer with Mr. Hartley and Ms. Palmer regarding [REDACTED].	KRC	0.70
9/15/2023	Back and forth with Mr. Parnell regarding [REDACTED] [REDACTED] (.20); telephone call with Mr. Parnell and co-counsel (.90); further work on [REDACTED] (1.0).	JJH	2.10
9/15/2023	Prepare for [REDACTED] with Mr. Parnell, Ms. Coumanis and Mr. Hartley .	RCP	0.70
9/15/2023	Conference call with Mr. Parnell, Ms. Coumanis and Mr. Hartley to discuss [REDACTED].	RCP	0.60
9/15/2023	Meet with Mr. Hartley and Ms. Coumanis regarding [REDACTED].	RCP	0.40
9/15/2023	[REDACTED] Alabama case law [REDACTED].	RCP	1.50
9/15/2023	[REDACTED] and [REDACTED] and [REDACTED] based on feedback from Mr. Parnell [REDACTED].	RCP	1.00
9/15/2023	Correspond with Mr. Hartley regarding [REDACTED].	RCP	0.10

9/15/2023	Review [REDACTED] memorandum [REDACTED] regarding [REDACTED]	RCP	0.50
9/15/2023	Review memo received [REDACTED]	KRC	0.50
9/15/2023	Mtg. with Mr. Parnell and Mr. Hartley to discuss [REDACTED]	KRC	1.90
9/19/2023	Review [REDACTED] from Mr. Parnell regarding [REDACTED]	RCP	0.10
9/20/2023	Office conference with Mrs. Palmer regarding [REDACTED]	JCP	0.50
9/20/2023	Work on [REDACTED] and receipt and review of [REDACTED] with Mr. Parnell (.40); meeting regarding [REDACTED] (.40); email Mr. Ross (.10); email Mr. Parnell (.10); back and forth with Mr. Ross regarding [REDACTED] (.20).	JJH	1.20
9/20/2023	Correspond with Ms. Coumanis regarding [REDACTED]	RCP	0.20
9/20/2023	Telephone call with Ms. Clausen regarding [REDACTED]	RCP	0.10
9/20/2023	Review [REDACTED]	RCP	1.00
9/20/2023	[REDACTED] file for recent [REDACTED]	RCP	0.20
9/20/2023	Review [REDACTED]	RCP	1.00
9/20/2023	Correspond and confer with Ms. Coumanis regarding [REDACTED]	RCP	0.40
9/20/2023	Confer with Mr. Hartley regarding [REDACTED]	RCP	0.30
9/20/2023	Meet with Mr. Pipes regarding [REDACTED]	RCP	0.50
9/20/2023	Correspond with Mr. Parnell, Mr. Pipes, Mr. Hartley and Ms. Coumanis regarding [REDACTED]	RCP	0.20

9/20/2023	Correspond with Mr. Parnell, Mr. Pipes, Mr. Hartley and Ms. Coumanis regarding [REDACTED].	RCP	0.10
9/20/2023	[REDACTED] correspondence [REDACTED] regarding [REDACTED].	RCP	0.40
9/20/2023	Telephone conference with Ms. Palmer [REDACTED].	KRC	0.70
9/21/2023	Office conference with Mrs. Palmer [REDACTED].	JCP	0.20
9/21/2023	Research regarding [REDACTED].	JCP	0.20
9/21/2023	Emails from Ms. Jackson (.10); email to Mr. Parnell (.10); continued coordination on [REDACTED] (.30).	JJH	0.50
9/21/2023	Reschedule [REDACTED] and correspond with Mr. Parnell regarding [REDACTED].	RCP	0.20
9/21/2023	[REDACTED] with Mr. Parnell to discuss [REDACTED].	RCP	0.10
9/21/2023	Review [REDACTED] from Mr. Hartley regarding [REDACTED].	RCP	0.10
9/21/2023	Meet and confer with Ms. Coumanis regarding [REDACTED].	RCP	0.20
9/21/2023	Telephone call with Mr. Parnell to discuss [REDACTED].	RCP	0.90
9/21/2023	Meet with Mr. Pipes and discuss [REDACTED].	RCP	0.40
9/21/2023	Correspond with Mr. Hartley regarding [REDACTED].	RCP	0.10
9/21/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.30
9/21/2023	[REDACTED] supplemental and amended [REDACTED].	RCP	0.80
9/21/2023	Confer with Ms. Palmer [REDACTED].	KRC	0.90
9/22/2023	Some work on [REDACTED] (.40).	JJH	0.40

9/22/2023	[REDACTED] in reply brief from Plaintiff's counsel concerning [REDACTED] [REDACTED] reply brief.	KRC	3.00
9/25/2023	Back and forth with Mr. Parnell (.20); receipt and review of [REDACTED] [REDACTED] (.30); emails back and forth regarding [REDACTED] (.10).	JJH	0.60
9/25/2023	Research for [REDACTED] [REDACTED] [REDACTED]	RCP	4.00
9/25/2023	Prepare [REDACTED] [REDACTED]	RCP	1.00
9/25/2023	[REDACTED]	RCP	0.60
9/25/2023	Correspond and confer with Ms. Coumanis regarding [REDACTED] [REDACTED]	RCP	0.30
9/25/2023	Confer with Mr. Hartley regarding [REDACTED] [REDACTED]	RCP	0.20
9/25/2023	Review [REDACTED] from Mr. Hartely regarding [REDACTED] [REDACTED]	RCP	0.20
9/25/2023	Confer with Ms. Palmer [REDACTED]	KRC	0.60
9/26/2023	Counsel call in preparation [REDACTED] [REDACTED] [REDACTED]	JJH	1.40
9/26/2023	Conference call with Mr. Parnell, Mr. Hartley, and Ms. Coumanis [REDACTED] [REDACTED]	RCP	0.60
9/26/2023	Re-examine [REDACTED] and [REDACTED] regarding [REDACTED] [REDACTED]	RCP	1.00
9/26/2023	Participate in telephone conference with Mr. Parnell and Mr. Hartley; [REDACTED]	KRC	1.30
9/26/2023	Confer with Ms. Palmer [REDACTED]	KRC	0.50
9/28/2023	Receipt and review of emails from [REDACTED] [REDACTED] (.10); emails from co-counsel (.10); [REDACTED] from Synovus (.10).	JJH	0.30

9/29/2023	Back and forth with all counsel [REDACTED] (.20); [REDACTED] conference call with all co-counsel (.40).	JJH	0.60
9/29/2023	Revise [REDACTED] and [REDACTED] [REDACTED]	RCP	0.60
9/29/2023	Correspond regarding availability for conference call with Mr. Parnell, Ms. Coumanis, Mr. Hartley, and Mr. Ross.	RCP	0.10
9/29/2023	Conference call with Mr. Parnell, Ms. Coumanis, and Mr. Hartley regarding [REDACTED].	RCP	0.70
9/29/2023	Telephone conference with Mr. Parnell, Mr. Hartley and Ms. Palmer; [REDACTED]	KRC	1.50
	Total		73.20
			\$20,689.50

SUMMARY OF SERVICES

<u>ATTORNEY</u>		<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
JJH	Jeffery J. Hartley	17.70	325.00	5,752.50
JCP	J. Casey Pipes	2.20	325.00	715.00
KRC	Keri R. Coumanis	20.10	300.00	6,030.00
KTM	Kathy T. Mallette	1.20	160.00	192.00
RCP	Rachel C. Palmer	32.00	250.00	8,000.00

EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Westlaw research for September 2023.	516.67
Alacourt service charge for September 2023.	9.20
AT&T Teleconference Services - Conference Call on 08/31/2023.	23.38
Total EXPENSES	\$549.25
Total	\$21,238.75

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 133131

1/10/2024

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/Synovus Bank

Client No. 10840
Matter No. 24613

Professional Services Rendered for the Period Ending December 31, 2023:

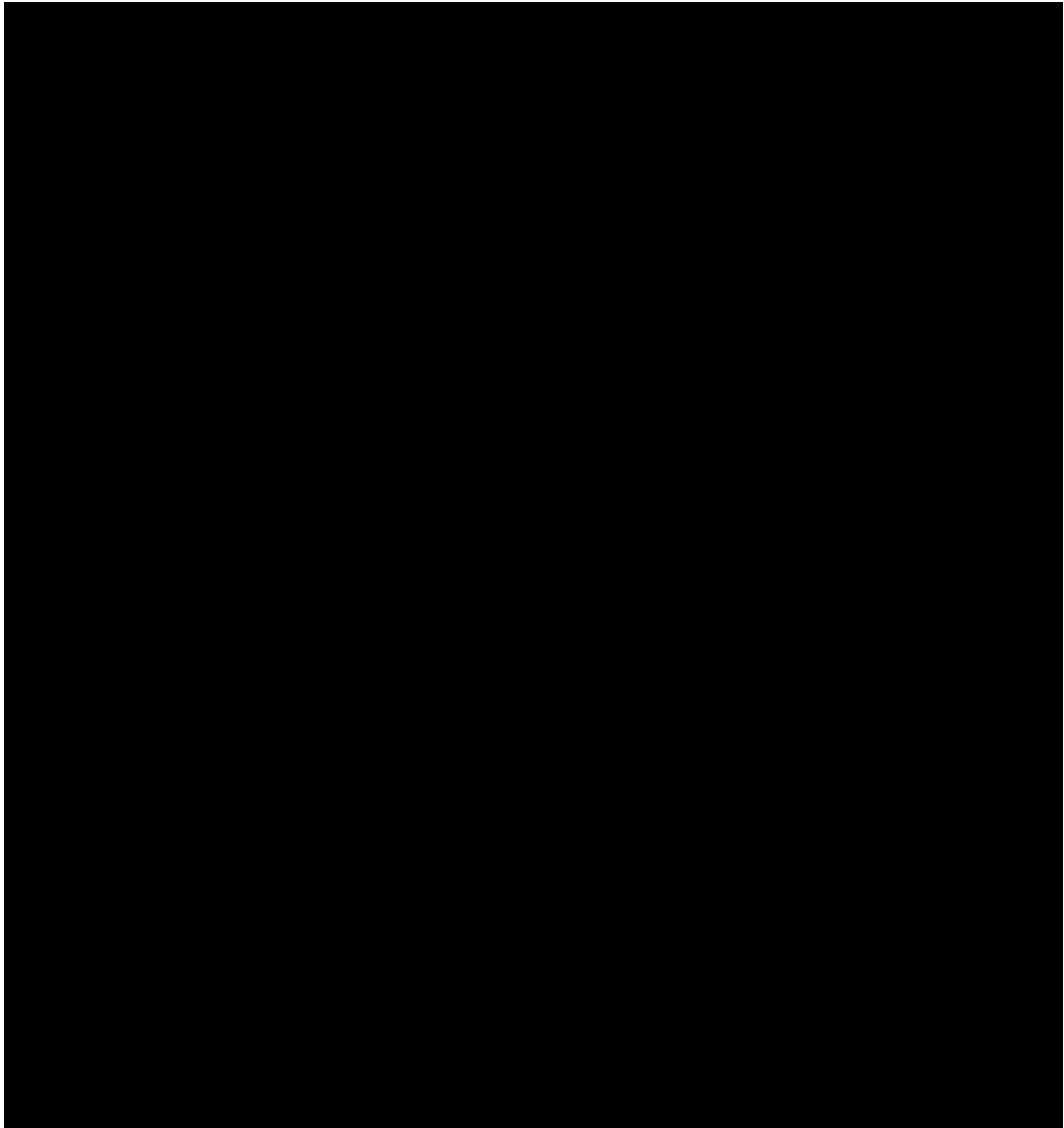
<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>	<u>HOURS</u>
9/26/2023	Review [REDACTED] for Chairman Heidelberg [REDACTED]	RCP	0.10
10/2/2023	Review [REDACTED]	KRC	0.70
10/2/2023	Continue research and draft [REDACTED]	KRC	2.80
10/2/2023	Draft supplemental objection; [REDACTED]	KRC	2.00
10/2/2023	Continue work on [REDACTED]	KRC	1.70
10/2/2023	Extended telephone call with [REDACTED] (.30); 4-6 emails with Mr. Parnell (.50); continued [REDACTED] (.70).	JJH	1.50
10/2/2023	Examine and analyze [REDACTED].	RCP	0.30
10/2/2023	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.10
10/2/2023	Download from AlaCourt [REDACTED] and prepare [REDACTED].	KTM	0.70
10/3/2023	Continue work on [REDACTED]	KRC	3.10
10/3/2023	Review applicable [REDACTED]	KRC	3.20
10/3/2023	Review [REDACTED].	KRC	1.00
10/3/2023	Six to eight emails [REDACTED] (.60); receipt and review of [REDACTED] (.30); [REDACTED] and work on [REDACTED] (1.0); back and forth with Mr. Ross 2-3 times (.20).	JJH	2.10
10/3/2023	Examine and analyze [REDACTED].	RCP	0.40
10/3/2023	Research [REDACTED].	RCP	0.30

10/3/2023	Review and revise [REDACTED].	RCP	1.50
10/3/2023	Confer with Mr. Hartley regarding [REDACTED] [REDACTED]	RCP	0.30
10/3/2023	Review of [REDACTED].	KTM	0.10
10/4/2023	Edit [REDACTED].	KRC	1.80
10/4/2023	Compile [REDACTED].	KRC	2.50
10/4/2023	Extended telephone call with Mr. Ross (.20); back and forth with Mr. Parnell (.10); 6-8 emails regarding [REDACTED] (.50); conference call with co-counsel [REDACTED] (1.60); coordinate [REDACTED] (.20).	JJH	2.60
10/4/2023	Review [REDACTED].	RCP	0.10
10/4/2023	Identify and assemble [REDACTED].	KTM	0.40
10/4/2023	Review of documents [REDACTED].	KTM	0.80
10/4/2023	Revise draft [REDACTED].	KRC	3.40
10/5/2023	Review [REDACTED] and [REDACTED].	KRC	1.90
10/5/2023	Meet with Mr. Parnell and Mr. Hartley.	KRC	0.50
10/5/2023	Telephone call with Mr. Ross and Mr. Copeland (.30); email Mr. Copeland (.10); work on [REDACTED] (1.0); work on [REDACTED] (1.50).	JJH	2.90
10/5/2023	Attend and participate in the depositions of Chairman Heidelberg and Mac Underwood.	RCP	9.00
10/5/2023	Review and revise [REDACTED].	RCP	1.50
10/5/2023	Meet with Mr. Parnell, Mr. Hartley and Ms. Coumanis [REDACTED].	RCP	0.20
10/5/2023	Continue [REDACTED] and prepare [REDACTED].	KTM	1.30
10/5/2023	Revise draft [REDACTED] research [REDACTED].	KRC	3.20

10/6/2023	Work on [REDACTED] with Mr. Parnell [REDACTED] (.30); to 9:00 a.m. hearing, meeting with lawyers for intervenors, meeting with counsel and to Board meeting at Prichard Water Works facility (2.20).	JJH	2.50
10/6/2023	Prepare for [REDACTED] with Mr. Parnell and Mr. Hartley.	RCP	0.40
10/6/2023	Attend hearing on Motions [REDACTED]	RCP	1.20
10/6/2023	Meet with [REDACTED] regarding the [REDACTED]	RCP	0.50
10/6/2023	Call with Judge Youngpeter to confirm court reporter for next week's hearing.	RCP	0.10
10/6/2023	Review [REDACTED] and prepare [REDACTED]	RCP	1.70
10/8/2023	Review [REDACTED] from Mr. Parnell and Mr. Hartley regarding [REDACTED].	RCP	0.10
10/9/2023	Office conference regarding [REDACTED].	JCP	0.10
10/9/2023	Confer with Mr. Parnell [REDACTED].	KRC	2.40
10/9/2023	Confer with Ms. Palmer; [REDACTED] to Mr. Parnell regarding [REDACTED].	KRC	0.80
10/9/2023	Continued work on [REDACTED] (1.0); extended telephone call with lead counsel (.70); receipt and review of [REDACTED] (.20); 12-15 emails [REDACTED] (1.50).	JJH	3.40
10/9/2023	Review the [REDACTED].	RCP	0.20
10/9/2023	Conference call with Ms. Coumanis, Mr. Hartley, and Mr. Parnell regarding [REDACTED].	RCP	0.70
10/10/2023	Meet with [REDACTED].	KRC	0.30
10/10/2023	Office conference with Ms. Coumanis regarding [REDACTED].	JCP	0.40
10/10/2023	Spend entire day at court on Synovus matter and post-court meeting with client and co-counsel.	JJH	9.30

Prichard Water Works and Sewer Board
Prichard Water Works/Synovus Bank
10840 24613

1/10/2024
133131
Page 4



10/13/2023	Six to ten emails and telephone calls and work on next steps and [REDACTED] (1.0).	JJH	1.00
10/13/2023	Review correspondence from Mr. Parnell regarding [REDACTED] and [REDACTED]	RCP	0.20
10/13/2023	Correspond regarding hearing exhibits and research of [REDACTED]	RCP	0.20
10/13/2023	Correspond with Ms. Sandra Presley regarding transcript of Judge Youngpeter's ruling from the bench at the end of the evidentiary hearing.	RCP	0.20
10/13/2023	Research [REDACTED].	KRC	0.90
10/13/2023	Review draft order and emails from Mr. Parnell and defense counsel.	KRC	1.10
10/13/2023	Research Alabama law regarding [REDACTED].	RCP	2.10
10/15/2023	Research [REDACTED]	KRC	1.20
10/15/2023	Review [REDACTED]	KRC	0.80
10/16/2023	Participate in post-trial [REDACTED] meeting with co-counsel (1.0); back and forth with Mr. Underwood (.10).	JJH	1.10
10/16/2023	Prepare for and participate in telephone conference with Mr. Hartley and Mr. Parnell concerning [REDACTED].	KRC	1.20
10/16/2023	Call with Ms. Sandra Presley regarding evidentiary hearing exhibits and transcript of Judge Youngpeter's ruling from the bench.	RCP	0.20
10/16/2023	Correspond with Mr. Parnell, Mr. Ross, Mr. Hartley, and Ms. Coumanis regarding [REDACTED].	RCP	0.10
10/16/2023	Conference call with Mr. Parnell, Mr. Ross, Mr. Hartley, Ms. Coumanis, Mr. Underwood, and Mr. Lewis to discuss [REDACTED].	RCP	1.20
10/17/2023	Receipt and review of draft of order from Southern Poverty Law (.20); 3-4 emails back and forth with Mr. Parnell (.20).	JJH	0.40
10/17/2023	Correspond with Mr. Parnell, Mr. Ross, Mr. Hartley, and Ms. Coumanis regarding [REDACTED].	RCP	0.10
10/17/2023	Review [REDACTED] and [REDACTED].	RCP	0.50
10/17/2023	Examine proposed order from Southern Poverty Law Center that includes creation of citizens council.	RCP	0.50

10/17/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.20
10/17/2023	Telephone call with Ms. Presley regarding transcript of Judge Youngpeter's ruling from the bench and hearing exhibits.	RCP	0.20
10/17/2023	Review of and scanning hearing exhibits.	KTM	1.20
10/18/2023	Back and forth with Synovus counsel (.10); set up conference call with our folks (.10); telephone call with Mr. Parnell [REDACTED] (.60); two emails from Synovus counsel (.10).	JJH	0.90
10/18/2023	Confer with Mr. Freidman [REDACTED].	KRC	0.90
10/18/2023	Confer with Mr. Hartley and Ms. Coumanis regarding [REDACTED].	RCP	0.20
10/18/2023	Telephone call with Ms. Presley regarding completed transcript of Judge Youngpeter's bench ruling.	RCP	0.10
10/18/2023	Receive and review [REDACTED].	RCP	0.30
10/18/2023	Correspond regarding [REDACTED].	RCP	0.30
10/18/2023	[REDACTED] conference with Ms. Coumanis.	JDF	0.10
10/18/2023	Review case law regarding [REDACTED].	JDF	0.50
10/18/2023	Prepare for conference call with Mr. Parnell to discuss [REDACTED].	KRC	1.40
10/18/2023	Conference call with Mr. Parnell, Ms. Coumanis, and Mr. Hartley regarding [REDACTED].	RCP	0.40
10/19/2023	Ten to twelve emails on [REDACTED].	JJH	0.60
10/19/2023	Confer with Ms. Coumainis and Mr. Hartley regarding [REDACTED].	RCP	0.30
10/19/2023	Review correspondence from Mr. Parnell [REDACTED] regarding [REDACTED].	RCP	0.20
10/19/2023	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.10
10/19/2023	Prepare draft of objection to proposed order.	RCP	0.50
10/19/2023	Research and [REDACTED].	KRC	1.60
10/19/2023	Review emails and draft objection; research [REDACTED].	KRC	2.10

10/19/2023	Research and review [REDACTED] at direction of Mr. Hartley for Mr. Parnell.	JDF	1.50
10/20/2023	Confer with Ms. Coumanis regarding [REDACTED]	RCP	0.20
10/20/2023	Call with Mr. Hartley to discuss [REDACTED]	RCP	0.20
10/20/2023	Review and revise motion for time to respond and object to proposed order.	RCP	0.80
10/20/2023	Review and revise objection to proposed order.	RCP	2.00
10/20/2023	Examine Alabama law regarding [REDACTED] and [REDACTED]	RCP	0.30
10/20/2023	Finalize and e-file motion for time to respond to Synovus Bank's proposed receivership order (.40).	DWC	0.40
10/20/2023	Draft [REDACTED]; send to Mr. Parnell; confer with Ms. Palmer.	KRC	5.80
10/23/2023	Emails over weekend regarding [REDACTED] (.20); coordinate [REDACTED] (.20); 4-5 emails regarding [REDACTED] (.20).	JJH	0.60
10/23/2023	Review [REDACTED] from Mr. Parnell; [REDACTED].	KRC	0.80
10/23/2023	Review [REDACTED] from Mr. Parnell; [REDACTED].	KRC	1.20
10/23/2023	Meet with Mr. Hartley regarding [REDACTED]	RCP	0.10
10/23/2023	Review correspondence regarding [REDACTED]	RCP	0.10
10/23/2023	Review of PWWSB's Motion for Time to Respond to Synovus Bank's Proposed Receivership Order, Order granting Motion for Time, and Intervenor WMEMCA's Proposed Order.	KTM	0.10
10/24/2023	Six to eight emails with co-counsel and others regarding [REDACTED]	JJH	0.40
10/24/2023	Continue research and draft objection to [REDACTED]	KRC	0.60
10/24/2023	Conference call with board members, Mr. Parnell, Mr. Mark Ezell, Mr. Underwood, Mr. Alston Ross, and Mr. Lewis to provide and receive updates [REDACTED]	RCP	0.50

10/24/2023	Review notes and prepare summary of conference call for recent updates on efforts with regard to [REDACTED] Mr. Hartley and Ms. Coumanis regarding [REDACTED].	RCP	0.50
10/25/2023	Eight to ten emails regarding [REDACTED].	JJH	0.60
10/25/2023	Review email from Mr. Underwood containing [REDACTED]; review Defendant's exhibits.	KRC	1.40
10/25/2023	Review correspondence from Mr. Underwood regarding [REDACTED].	RCP	0.20
10/25/2023	Continue research and draft objection to [REDACTED].	KRC	2.60
10/25/2023	Continue research and draft objection to [REDACTED].	KRC	2.10
10/25/2023	Prepare summary of October 10, 2023 hearing exhibits.	KTM	0.60
10/26/2023	Coordinate response [REDACTED] and [REDACTED] (.30); attach part of call [REDACTED] (.30).	JJH	0.60
10/26/2023	Review [REDACTED] in support of client's argument; add to [REDACTED].	KRC	2.50
10/26/2023	Review [REDACTED].	KRC	2.00
10/26/2023	Draft [REDACTED].	KRC	2.20
10/26/2023	Conference call with Ms. Coumanis and Mr. Underwood [REDACTED].	RCP	0.40
10/26/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.50
10/26/2023	Examine mobile county probate records to determine if Synovus filed notice of mortgage lien.	RCP	0.50
10/26/2023	Confer with Mr. Hartley regarding [REDACTED].	RCP	0.10
10/26/2023	Research Section [REDACTED] and identify [REDACTED] support of client's [REDACTED].	KRC	2.90
10/26/2023	Review and revise Response and Objection to Proposed Order.	RCP	4.20
10/26/2023	Examine and analyze provisions of [REDACTED] and relevant [REDACTED].	RCP	0.90
10/27/2023	Work on [REDACTED] and 8-10 emails regarding [REDACTED].	JJH	1.20

10/27/2023	Review brief and office conference with Ms. Coumanis regarding [REDACTED].	JCP	0.50
10/27/2023	Finalize objection to receivership order.	KRC	3.30
10/27/2023	Finalize objection to receivership order.	KRC	1.00
10/27/2023	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.20
10/27/2023	Correspond regarding [REDACTED] and [REDACTED] and [REDACTED].	RCP	0.10
10/27/2023	Search for Trustee Indenture in court record.	KTM	0.10
10/27/2023	Review and revise final draft of the Response and Objection to the Proposed Order.	RCP	1.90
10/30/2023	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.10
10/30/2023	Review recent article addressing the water board's filed response and objection to the proposed order.	RCP	0.20
10/30/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.20
10/30/2023	Review and revise notice of appearance as additional counsel of record.	RCP	0.20
10/31/2023	Twelve to fifteen emails through last two days [REDACTED] and [REDACTED].	JJH	1.20
10/31/2023	Correspond regarding [REDACTED] and [REDACTED] and [REDACTED].	RCP	0.20
10/31/2023	Filed response and objection to the proposed order.	RCP	0.30
10/31/2023	Confer with Ms. Coumanis regarding [REDACTED] and [REDACTED].	RCP	0.20
11/1/2023	Conference call with co-counsel and others regarding [REDACTED] and [REDACTED] regarding [REDACTED] (.90); work on [REDACTED] and [REDACTED] (.20).	JJH	1.10
11/1/2023	Participate in telephone conference with Mr. Parnell and Mr. Ross regarding [REDACTED]; research [REDACTED]; research [REDACTED].	KRC	1.80
11/1/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.20
11/1/2023	Conference call with Mr. Hartley, Ms. Coumanis, and Mr. Parnell regarding [REDACTED].	RCP	1.00
11/1/2023	Prepare Motion to Intervene for the City of Prichard.	RCP	1.30

11/2/2023	Work on [REDACTED] and [REDACTED] (.40); work on and [REDACTED] and [REDACTED] and [REDACTED] (.70); 4-6 emails on [REDACTED] (.30)	JJH	1.40
11/2/2023	Research [REDACTED] to support the [REDACTED].	RCP	1.00
11/2/2023	Prepare Motion to Intervene for the City of Prichard.	RCP	0.80
11/2/2023	Review and revise [REDACTED].	RCP	0.40
11/2/2023	Review and provide comments to [REDACTED] and [REDACTED].	RCP	1.50
11/2/2023	Review various [REDACTED] and [REDACTED].	KRC	0.80
11/2/2023	Review Motion to Appoint a Receiver and case law.	KRC	1.20
11/3/2023	Ten to fifteen emails on [REDACTED] and [REDACTED] (1.0); research [REDACTED] and [REDACTED] (1.30).	JJH	2.30
11/3/2023	Draft motion for oral argument.	KRC	0.60
11/3/2023	Correspond regarding [REDACTED].	RCP	0.10
11/3/2023	Review and revise [REDACTED] and [REDACTED].	RCP	0.50
11/3/2023	Revise and finalize [REDACTED].	KTM	0.20
11/6/2023	Receipt and review of motion to compel (.20); back and forth with Mr. Parnell [REDACTED] (.30); work on [REDACTED] (.10).	JJH	0.60
11/6/2023	Draft [REDACTED]; research [REDACTED]; research [REDACTED].	KRC	3.20
11/6/2023	Correspond with Sandra Presely requesting full transcript of October 10th hearing.	RCP	0.10
11/6/2023	Examine and analyze research for [REDACTED].	RCP	0.30
11/6/2023	Prepare draft [REDACTED] and [REDACTED].	KTM	0.60
11/6/2023	Prepare draft proposed [REDACTED].	KTM	0.80
11/7/2023	Telephone Conference with Ms. Buddrus concerning [REDACTED]; [REDACTED].	KRC	0.30

11/7/2023	Correspond with Ms. Presley regarding transcript from October 10 hearing.	RCP	0.20
11/7/2023	Correspond with Mr. Parnell, Mr. Hartley, and Mr. Coumanis regarding [REDACTED].	RCP	0.10
11/9/2023	Review emails from Mr. Parnell regarding [REDACTED].	RCP	0.10
11/10/2023	Review [REDACTED] and confer with Ms. Buddrus.	KRC	0.80
11/10/2023	Review and revise non-party subpoena to MAWSS.	RCP	0.20
11/10/2023	Correspond with Ms. Presley regarding full transcript of October 10th hearing.	RCP	0.10
11/10/2023	Review orders from the court.	RCP	0.30
11/10/2023	Review and revise motion to stay pending appeal.	RCP	1.00
11/10/2023	Prepare draft Notice of Intent to Serve and Subpoena requesting documents to be served on non-party MAWSS.	KTM	0.60
11/13/2023	Ten to fifteen emails (last Friday, weekend and today) [REDACTED] and [REDACTED].	JJH	1.50
11/13/2023	Correspond with Ms. Presley regarding full transcript.	RCP	0.10
11/13/2023	Review and revise motion to stay on appeal.	RCP	0.80
11/13/2023	Confer with Ms. Hartley regarding [REDACTED].	RCP	0.10
11/13/2023	Research [REDACTED].	KRC	2.10
11/13/2023	Continued review [REDACTED] and [REDACTED].	KRC	1.10
11/14/2023	Four to six status emails back and forth (.40); conference call with co-counsel to discuss [REDACTED] (.80).	JJH	1.20
11/14/2023	Participate in telephone conference with Mr. Parnell and Mr. Hartley concerning [REDACTED].	KRC	0.50
11/14/2023	Confer with Ms. Buddrus; email Mr. Parnell; research [REDACTED].	KRC	0.70
11/14/2023	Review [REDACTED] and confer regarding [REDACTED].	RCP	0.20
11/14/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.20
11/14/2023	Review sample notice of appeal and docketing statement.	RCP	0.20
11/14/2023	Research [REDACTED]; identify [REDACTED].	KRC	1.80
11/14/2023	Conference call with Mr. Parnell, Ms. Coumanis, and Mr. Hartley regarding [REDACTED].	RCP	0.80

11/14/2023	Review [REDACTED] and [REDACTED].	KTM	0.20
11/15/2023	Email Ms. Mallette concerning [REDACTED].	KRC	0.50
11/16/2023	Back and forth with Mr. Parnell and Mr. Ross (.20); [REDACTED] and [REDACTED] call with Mr. Parness and Mr. Ross (.50).	JJH	0.70
11/17/2023	Extended [REDACTED] and [REDACTED] call with Mr. Parnell and Mr. Ross (.80); 12-15 emails on various matters throughout the day (1.20).	JJH	2.00
11/17/2023	Call with Mr. Hartley regarding [REDACTED] and [REDACTED].	RCP	0.20
11/17/2023	Confer with Ms. Coumanis regarding [REDACTED] and [REDACTED].	RCP	0.50
11/17/2023	Research [REDACTED] addressing [REDACTED] and [REDACTED] and correspond with Mr. Hartley regarding [REDACTED].	RCP	0.30
11/17/2023	Correspond with Ms. Coumanis regarding [REDACTED].	RCP	0.20
11/17/2023	Correspond with Mr. Parnell and Mr. Ross regarding [REDACTED].	RCP	0.10
11/17/2023	Draft docketing statement [REDACTED]; confer with Ms. Buddrus; research [REDACTED].	KRC	2.90
11/17/2023	Prepare [REDACTED].	KTM	0.80
11/20/2023	Reviewing Docketing Statement and undertaking research regarding [REDACTED]; Preparing email to Keri Coumanis regarding [REDACTED].	WWW	0.70
11/20/2023	Review [REDACTED] received from Mr. Parnell and confer with Mr. Watts.	KRC	0.30
11/20/2023	Review and revise notice of appeal.	RCP	0.80
11/20/2023	Review emails regarding [REDACTED].	RCP	0.10
11/21/2023	Reviewing and replying to email from Keri Coumanis regarding [REDACTED]; Reviewing [REDACTED]; Further reviews and replies to email from Keri Coumanis suggesting [REDACTED].	WWW	0.70
11/21/2023	Review [REDACTED] and notice of appeal.	KRC	1.10

11/21/2023	Review and respond to emails (3-4) concerning [REDACTED] and [REDACTED]; revise docketing statement.	KRC	1.80
11/21/2023	Review analysis of [REDACTED] and revised [REDACTED].	RCP	0.50
11/21/2023	Review and revise [REDACTED].	RCP	0.20
11/21/2023	Confer with Ms. Coumanis regarding [REDACTED].	RCP	0.20
11/22/2023	Correspond with Ms. Presley regarding exhibits from October 10 hearing.	RCP	0.10
11/22/2023	Provide update regarding [REDACTED].	RCP	0.10
11/27/2023	Coordinate [REDACTED] from October 10 hearing.	RCP	0.20
11/27/2023	Review [REDACTED].	RCP	0.20
11/27/2023	Correspond with co-counsel regarding [REDACTED].	RCP	0.10
11/27/2023	Review and revise [REDACTED].	RCP	0.50
11/29/2023	(Last 5-7 business days) 15-20 emails and [REDACTED] and [REDACTED] and work on [REDACTED].	JJH	2.00
11/29/2023	Correspond regarding [REDACTED].	RCP	0.10
11/29/2023	Revise and finalize subpoena requesting documents to be served on non-party MAWSS.	KTM	0.30
12/1/2023	Call Judge Youngpeter's office to confirm availability of court reporter for hearing on motion to compel and correspond with Mr. Parnell regarding [REDACTED].	RCP	0.20
12/1/2023	Receipt and review of letter from Mr. Young, [REDACTED] Mr. Hartley and Mr. Parnell.	KRC	0.30
12/4/2023	Review correspondence regarding motion objecting to attorneys' fees and Receiver's position on the Board's attorneys' fees.	RCP	0.20
12/4/2023	Correspond regarding [REDACTED].	RCP	0.10
12/5/2023	Back and forth emails with Mr. Ross and Mr. Parnell (.20); set up [REDACTED] conference call (.60).	JJH	0.80
12/5/2023	Conference call with co-counsel to discuss [REDACTED].	RCP	0.60

12/5/2023	Meet with Mr. Hartley and Ms. Coumanis to discuss [REDACTED] [REDACTED]	RCP	0.50
12/5/2023	Examine and analyze Alabama law regarding [REDACTED] [REDACTED].	RCP	0.50
12/5/2023	Prepare [REDACTED] [REDACTED]	RCP	2.00
12/5/2023	Review receiver's letter regarding stay of litigation.	RCP	0.20
12/5/2023	Confer with Mr. Hartley regarding [REDACTED].	KRC	0.90
12/5/2023	Conference call with Mr. Parnell, Ms. Palmer and Mr. Hartley.	KRC	0.50
12/6/2023	Research regarding [REDACTED] for client entity.	JCP	1.50
12/6/2023	Identify and assemble ArentFox invoices and prepare summary of same.	KTM	1.10
12/6/2023	Correspond regarding [REDACTED] [REDACTED].	RCP	0.50
12/6/2023	Confer regarding [REDACTED].	RCP	0.20
12/6/2023	Review trustee's attorneys' invoices and index of invoices received through September 2023.	RCP	0.30
12/6/2023	Review suggested revisions to [REDACTED] and revise [REDACTED].	RCP	2.00
12/6/2023	Correspond regarding [REDACTED] [REDACTED]	RCP	0.50
12/6/2023	Examine and analyze [REDACTED] [REDACTED]	RCP	0.50
12/6/2023	Meet with Ms. Coumanis and Mr. Pipes to discuss [REDACTED] [REDACTED]	RCP	0.20
12/6/2023	Research [REDACTED] and [REDACTED].	KRC	1.20
12/6/2023	Revise draft motion to stay to be filed in the Alabama Supreme Court.	KRC	1.00
12/7/2023	Additional research regarding [REDACTED] and [REDACTED].	JCP	1.30
12/7/2023	Review of certified mail return receipt confirming service of Subpoena on non-party MAWSS.	KTM	0.10
12/7/2023	Review of Circuit Court pleadings filed to-date and prepare summary of same.	KTM	0.30

12/7/2023	Review [REDACTED] addressing [REDACTED] and correspond with Mr. Watts regarding [REDACTED].	RCP	0.20
12/7/2023	Review correspondence from Mr. Pipes, Ms. Coumanis, and Mr. Watts regarding [REDACTED].	RCP	0.30
12/7/2023	Revise draft motion [REDACTED].	KRC	0.70
12/7/2023	Research [REDACTED].	KRC	1.00
12/8/2023	Review and revise [REDACTED].	RCP	1.00
12/8/2023	Research [REDACTED] and [REDACTED]; confer with Mr. Hartley and Ms. Buddrus.	KRC	1.20
12/11/2023	Correspond with Ms. Presley regarding transcript of evidentiary hearing.	RCP	0.10
12/11/2023	Correspond with Mr. Parnell, Ms. Coumanis, and Mr. Hartley [REDACTED].	RCP	0.10
12/14/2023	Correspond with Judge Youngpeter's court reporter regarding W-9 and invoice for hearing transcript.	RCP	0.10
12/15/2023	Confer with Ms. Coumanis and Mr. Hartley regarding [REDACTED].	RCP	0.40
12/15/2023	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.10
12/18/2023	Call with Sandra Presley regarding completed transcript.	RCP	0.20
12/18/2023	Correspond with Ms. Presley regarding completed transcript and invoice for transcript.	RCP	0.10
12/18/2023	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.10
	Total		<u>274.60</u>
			\$77,744.50

SUMMARY OF SERVICES

<u>ATTORNEY</u>		<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
JJH	Jeffery J. Hartley	59.10	325.00	19,207.50
DWC	Diane W. Clausen	0.40	120.00	48.00
JCP	J. Casey Pipes	3.80	325.00	1,235.00
JDF	Joshua D. Friedman	2.10	250.00	525.00
KRC	Keri R. Coumanis	116.20	300.00	34,860.00
KTM	Kathy T. Mallette	10.40	120.00	1,248.00
KTM	Kathy T. Mallette	1.50	160.00	240.00
RCP	Rachel C. Palmer	79.60	250.00	19,900.00
RCP	Rachel C. Palmer	0.10	260.00	26.00
WWW	William W. Watts, III	1.40	325.00	455.00

EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Sandra Presley - Obtaining transcript from hearing on 10/11/2023.	100.00
Mobile County Probate Court - Obtaining copy of court documents.	0.32
Reggie Copeland, Jr., LLC - Fee for testimony at hearing on 10/11/2023.	1,600.00
AT&T Teleconference Services - Conference call on 09/15/2023.	15.33
AT&T Teleconference Services - Conference call on 09/26/2023.	19.95
AT&T Teleconference Services - Conference call on 09/29/2023.	19.25
Alacourt service charge for October 2023.	90.20
Westlaw research for October 2023.	814.28
Mobile County Circuit Court - Fee for filing non-party subpoena to MAWSS.	13.00
AT&T Teleconference Services - Conference call on 10/18/2023.	3.36
AT&T Teleconference Services - Conference call on 10/26/2023.	8.42
AT&T Teleconference Services - Conference call on 10/04/2023.	26.72
Alacourt service charge for November 2023.	18.10
Westlaw research for November 2023.	277.27
Alabama Secretary of State - Obtaining copies of corporate documents re: Water Works and Sewer Board of the City of Prichard.	31.50
U.S. District Court, Southern District of Alabama - Obtaining Certificate of Good Standing for Mr. Hartley.	21.00
Mobile County Law Library - Copies.	2.50

Prichard Water Works and Sewer Board
Prichard Water Works/Synovus Bank
10840 24613

1/10/2024
133131
Page 17

AT&T Teleconference Services - Conference call on 11/01/2023.	28.24
AT&T Teleconference Services - Conference call on 11/14/2023.	10.96
AT&T Teleconference Services - Conference call on 11/16/2023.	3.12
AT&T Teleconference Services - Conference call on 11/17/2023.	16.16
Alacourt service charge for December 2023.	23.20
Postage	9.49
Copying	3.75
Total EXPENSES	\$3,156.12

Total	\$80,900.62
--------------	--------------------

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 133948

2/23/2024

Client: Prichard Water Works and Sewer Board

Client No. 10840

Matter: Prichard Water Works/AL Supreme Court Appeal

Matter No. 25249

Professional Services Rendered for the Period Ending January 31, 2024:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>
1/11/2024	Review notice regarding completion of record on appeal and correspondence from Mr. Hartley, Ms. Coumanis, and Mr. Parnell regarding [REDACTED].	RCP
1/11/2024	Office conference with Mr. Hartley, Ms. Palmer and Ms. Coumanis regarding [REDACTED].	WWW
1/12/2024	Meet with Mr. Hartley, Ms. Coumanis and Mr. Watts regarding [REDACTED].	RCP
1/12/2024	Participate in telephone conference with Mr. Hartley, Mr. Watts and Mr. Buddrus.	KRC
1/16/2024	Work on [REDACTED] the last 7-10 days and coordinate [REDACTED] conference call tomorrow.	JJH
1/17/2024	Back and forth with co-counsel and work on and coordinate [REDACTED].	JJH
1/17/2024	Review correspondence regarding [REDACTED] with co-counsel to discuss [REDACTED].	RCP
1/17/2024	Confer with Mr. Hartley regarding [REDACTED].	KRC
1/18/2024	Coordinate and conduct [REDACTED] conference call and meeting and develop [REDACTED] (1.30); email to Synovus counsel regarding more time (.10); 4-5 follow-up emails (.30).	JJH
1/18/2024	Conference call with Mr. Parnell, Mr. Watts, Ms. Coumanis, and Mr. Hartley to discuss [REDACTED].	RCP
1/18/2024	Meet with Mr. Watts, Ms. Coumanis, and Mr. Hartley to discuss [REDACTED].	RCP
1/18/2024	Review [REDACTED] and [REDACTED] to assist in [REDACTED] and [REDACTED] and correspond with Mr. Hartley regarding same.	RCP
1/18/2024	Telephone conference with Mr. Parnell, Mr. Hartley, Ms. Parnell and Mr. Watts concerning [REDACTED].	KRC
1/18/2024	Telephone conference with Mr. Parnell, Mr. Hartley, Ms. Palmer and Ms. Coumanis regarding [REDACTED].	WWW
1/19/2024	Six to eight emails regarding [REDACTED].	JJH

1/19/2024	Review correspondence with Mr. Hartley and Ms. Jackson regarding extension for time to file briefs.	RCP
1/19/2024	Undertaking research regarding [REDACTED].	WWW
1/19/2024	Reviewing [REDACTED].	WWW
1/19/2024	Preparing email to Mr. Hartley regarding [REDACTED].	WWW
1/22/2024	Work on [REDACTED] and [REDACTED] and coordinate [REDACTED] and 6-8 emails regarding [REDACTED].	JJH
1/22/2024	Correspond regarding [REDACTED] and [REDACTED].	RCP
1/22/2024	Review correspondence regarding parties' agreement as to additional time to file appeal briefs and motion requesting same.	RCP
1/22/2024	Revise [REDACTED] per comments from Mr. Watts and Mr. Hartley.	KRC
1/22/2024	Research [REDACTED].	KRC
1/22/2024	Draft [REDACTED]; review [REDACTED].	KRC
1/22/2024	Telephone conference with Mr. Hartley regarding [REDACTED].	WWW
1/23/2024	Ten to twelve telephone call and emails and coordinate [REDACTED] and [REDACTED].	JJH
1/23/2024	Review correspondence regarding [REDACTED].	RCP
1/23/2024	Confer with Ms. Nieden regarding background of case on appeal, appeal file, and the Alabama Appellate Court System.	RCP
1/23/2024	Revisions to [REDACTED].	WWW
1/23/2024	Reviewing revisions to [REDACTED].	WWW
1/23/2024	Emailing Ms. Jackson enclosing motion for extension of time.	WWW
1/24/2024	Finalize motion to extend and back and forth telephone calls and emails with co-counsel and Ms. Jackson.	JJH
1/24/2024	Prepare [REDACTED] to use in appeal.	RCP
1/24/2024	Confer with Ms. Coumanis regarding [REDACTED].	RCP
1/24/2024	Correspond with Mr. Parnell, Mr. Watts, Ms. Coumanis and Mr. Hartley regarding [REDACTED].	RCP
1/24/2024	Telephone call to Alabama Supreme Court and further emails to S. Jackson	WWW
1/24/2024	Further revisions to [REDACTED].	WWW

1/24/2024	Reviewing email from Ms. Jackson and replying to email regarding motion for extension of time.	WWW
1/24/2024	Telephone calls to Ms. Jackson, staff attorney at Ala. S. Ct. and clerk's office regarding extension of time.	WWW
1/24/2024	Telephone conference with Ms. Coumanis regarding [REDACTED].	WWW
1/25/2024	Six to eight telephone calls and emails on [REDACTED] and [REDACTED].	JJH
1/25/2024	Prepare [REDACTED] for use in appeal.	RCP
1/25/2024	Further revisions to [REDACTED].	WWW
1/25/2024	Reviewing case law regarding [REDACTED] and [REDACTED].	WWW
1/26/2024	Organize pleadings from the appellate court for the file.	JNN
1/26/2024	Review Court's order granting partial expansion of time to file briefs.	RCP
1/26/2024	Prepare [REDACTED] for use in appeal.	RCP
1/26/2024	Correspond with co-counsel regarding [REDACTED].	RCP
1/26/2024	Reviewing [REDACTED]; preparing email to Mark Parnell; preparing email to K. Coumanis.	WWW
1/26/2024	Review [REDACTED] start building outline of appeal.	KRC
1/29/2024	Prepare [REDACTED] to assist in appeal.	RCP
1/29/2024	Correspond with Mr. Watts and Ms. Coumanis regarding [REDACTED].	RCP
1/29/2024	Conduct research identifying [REDACTED].	KRC
1/29/2024	Format and set up initial brief and begin draft of statement of facts and jurisdiction.	KRC
1/30/2024	Prepare summary of [REDACTED] at evidentiary hearing.	RCP
1/30/2024	Correspond with Mr. Watts and Ms. Coumanis as to [REDACTED] and [REDACTED].	RCP

1/30/2024	Confer with Ms. Coumanis and Ms. Nieden to [REDACTED] and [REDACTED].	RCP
1/30/2024	Correspond with Mr. Watts regarding [REDACTED].	RCP
1/30/2024	Reviewing [REDACTED] at hearing on Motion for Appointment of Receiver.	WWW
1/30/2024	Begin initial draft of statement of facts.	KRC
1/30/2024	Draft statement of the case.	KRC
1/31/2024	Prepare summary of Mr. John Young's testimony at evidentiary hearing.	RCP
1/31/2024	Conduct research regarding [REDACTED] and [REDACTED].	KRC
1/31/2024	Review filings from [REDACTED].	KRC
	Total	\$15,593.50

SUMMARY OF SERVICES

ATTORNEY		HOURS	RATE	AMOUNT
JJH	Jeffery J. Hartley	8.00	325.00	2,600.00
JNN	Noelle Neiden	0.60	160.00	96.00
KRC	Keri R. Coumanis	15.40	300.00	4,620.00
RCP	Rachel C. Palmer	19.20	250.00	4,800.00
WWW	William W. Watts, III	10.70	325.00	3,477.50

EXPENSES

DESCRIPTION	AMOUNT
Westlaw research for January 2024.	125.33
Total EXPENSES	\$125.33

Total	\$15,718.83
--------------	--------------------

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 134417

3/18/2024

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/AL Supreme Court Appeal

Client No. 10840
Matter No. 25249

Professional Services Rendered for the Period Ending February 29, 2024:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>
1/25/2024	Reviewing decision of [REDACTED] relating to [REDACTED].	WWW
2/1/2024	Reviewing case law regarding [REDACTED];	WWW
2/1/2024	Reviewing [REDACTED] filed in circuit court.	WWW
2/1/2024	Confer with Mr. Watts; research [REDACTED]; identify [REDACTED]; research [REDACTED].	KRC
2/1/2024	Review transcript of evidentiary hearing and prepare [REDACTED].	RCP
2/1/2024	Prepare summary of evidentiary hearing transcript addressing [REDACTED].	RCP
2/1/2024	Review correspondence regarding [REDACTED].	RCP
2/1/2024	Office conference with Ms. Coumanis regarding [REDACTED];	WWW
2/2/2024	Undertaking Research regarding [REDACTED].	WWW
2/2/2024	Reviewing motion [REDACTED] with Alabama Supreme Court.	WWW
2/2/2024	Reviewing [REDACTED].	WWW
2/2/2024	Reviewing case law regarding [REDACTED].	WWW
2/2/2024	Review research and organize research related to appeal [REDACTED].	KRC
2/2/2024	Complete summary of [REDACTED] testimony of [REDACTED] and [REDACTED].	RCP
2/2/2024	Reviewing memorandum of Ms. Coumanis regarding [REDACTED].	WWW
2/4/2024	Reviewing opposition of Synovus to Prichard Water Board's motion to stay filed with Alabama Supreme Court.	WWW
2/4/2024	Reviewing [REDACTED] of receiver.	WWW

2/4/2024	Reviewing case law regarding [REDACTED].	WWW
2/5/2024	Work on [REDACTED].	KRC
2/5/2024	Conference with Mr. Watts.	KRC
2/5/2024	Review correspondence from Mr. Watts regarding [REDACTED].	RCP
2/5/2024	Examine transcript of [REDACTED] and prepare summary of [REDACTED] of Mac Underwood.	RCP
2/5/2024	Preparing memorandum to Mr. Hartley and Ms. Coumanis regarding [REDACTED].	WWW
2/5/2024	Reviewing [REDACTED] from Alabama Supreme Court regarding [REDACTED].	WWW
2/5/2024	Reviewing [REDACTED] at issue in [REDACTED].	WWW
2/5/2024	[REDACTED] with Ms. Coumanis.	WWW
2/6/2024	Reviewing [REDACTED].	WWW
2/6/2024	Reviewing [REDACTED].	WWW
2/6/2024	Research issues pertaining to [REDACTED].	KRC
2/6/2024	Work on [REDACTED] and [REDACTED].	KRC
2/6/2024	Review [REDACTED] and prepare [REDACTED] of Mac Underwood.	RCP
2/6/2024	Prepare [REDACTED].	RCP
2/6/2024	Reviewing emails regarding [REDACTED].	WWW
2/6/2024	Email Ms. Palmer regarding [REDACTED].	WWW
2/7/2024	Reviewing [REDACTED] at hearing.	WWW
2/7/2024	Reviewing [REDACTED] regarding [REDACTED].	WWW
2/7/2024	Work on [REDACTED]; research [REDACTED] case; telephone conference with Mr. Parnell and Mr. Watts.	KRC
2/7/2024	Research [REDACTED].	KRC
2/7/2024	Work on [REDACTED].	KRC
2/7/2024	Continue drafting [REDACTED].	KRC
2/7/2024	Correspond with Mr. Watts regarding [REDACTED].	RCP
2/7/2024	Prepare [REDACTED] and [REDACTED] of Mac Underwood.	RCP

2/7/2024	Review [REDACTED]	RCP
2/7/2024	Telephone conference with Mr. Parnell regarding [REDACTED]	WWW
2/8/2024	Undertaking research regarding [REDACTED]	WWW
2/8/2024	Research [REDACTED]	KRC
2/8/2024	Compare [REDACTED]	KRC
2/8/2024	Continue [REDACTED]	KRC
2/8/2024	Examine and analyze [REDACTED]	RCP
2/8/2024	Confer with Ms. Coumanis regarding [REDACTED]	RCP
2/9/2024	[REDACTED] appeal documents [REDACTED]	JNN
2/9/2024	Review and organize [REDACTED] Appeal documents.	JNN
2/9/2024	Continue working on [REDACTED].	KRC
2/9/2024	Review [REDACTED] filings and its applicability to our case.	KRC
2/9/2024	Researching and identifying [REDACTED]	KRC
2/9/2024	Draft argument [REDACTED].	KRC
2/9/2024	Review record on appeal for [REDACTED].	RCP
2/9/2024	Office conference with Ms. Coumanis regarding [REDACTED].	WWW
2/9/2024	[REDACTED] email from Ms. Coumanis.	WWW
2/11/2024	Draft edit and revise [REDACTED] of appeal brief and send to Mr. Watts and Ms. Buddrus; research [REDACTED].	KRC
2/12/2024	[REDACTED] of appeal page by page.	JNN
2/12/2024	Undertaking research regarding [REDACTED] and [REDACTED]	WWW
2/12/2024	Prepare summary of [REDACTED] Mac Underwood [REDACTED].	RCP
2/12/2024	Confer with Mr. Watts regarding [REDACTED].	RCP
2/12/2024	Reviewing Ms. Coumanis' draft [REDACTED].	WWW

2/13/2024	Further preparation of [REDACTED] regarding [REDACTED] [REDACTED]	WWW
2/13/2024	Undertaking further research regarding [REDACTED].	WWW
2/13/2024	Undertaking research regarding [REDACTED] [REDACTED].	WWW
2/14/2024	Office conference with Mr. Watts regarding [REDACTED].	JCP
2/14/2024	Reviewing [REDACTED].	WWW
2/14/2024	Further preparation of legal argument regarding [REDACTED].	WWW
2/14/2024	Undertaking research regarding [REDACTED] [REDACTED]	WWW
2/14/2024	Further preparation of legal arguments relating to [REDACTED] [REDACTED]	WWW
2/14/2024	Research record; respond to emails from Mr. Watts and Ms. Buddrus; email Mr. Watts.	KRC
2/14/2024	Review correspondence from Mr. Watts regarding [REDACTED] [REDACTED].	RCP
2/14/2024	Examine and analyze plaintiff's evidentiary hearing exhibits for bond issue documents.	RCP
2/14/2024	Correspond with Ms. Coumanis regarding [REDACTED] [REDACTED].	RCP
2/14/2024	Review [REDACTED] on appeal.	RCP
2/14/2024	Correspond with Mr. Watts regarding [REDACTED] [REDACTED].	RCP
2/14/2024	Review correspondence from Ms. Coumanis regarding [REDACTED].	RCP
2/14/2024	Telephone conference with Mr. Hartley.	WWW
2/14/2024	Office conference with Ms. Palmer regarding [REDACTED].	WWW
2/15/2024	Undertaking research regarding [REDACTED] [REDACTED].	WWW
2/15/2024	Further research regarding [REDACTED] [REDACTED]	WWW
2/15/2024	Further preparation of legal arguments Appellant's brief including [REDACTED] [REDACTED]	WWW
2/15/2024	Meet with Mr. Watts regarding [REDACTED].	RCP

2/15/2024	Review [REDACTED].	RCP
2/15/2024	Correspond with Ms. Coumanis regarding [REDACTED].	RCP
2/15/2024	Review draft of appeal [REDACTED] from Ms. Coumanis [REDACTED].	RCP
2/15/2024	Examine and analyze [REDACTED].	RCP
2/15/2024	Examine and analyze [REDACTED].	RCP
2/16/2024	(Last two weeks) - coordinate appeal [REDACTED].	JJH
2/16/2024	Reviewing status of Prichard Water Works and Sewer Board [REDACTED].	WWW
2/16/2024	Undertaking research regarding [REDACTED].	WWW
2/16/2024	Further preparation of Appellant's brief.	WWW
2/17/2024	Examine and analyze plaintiff's [REDACTED].	RCP
2/17/2024	Prepare statement of facts [REDACTED].	RCP
2/18/2024	Further preparation of Appellant's brief.	WWW
2/18/2024	Draft statement of facts [REDACTED].	KRC
2/18/2024	Review [REDACTED] for inclusion in statement of facts.	KRC
2/18/2024	Revise [REDACTED] per instruction from Mr. Watts and Ms. Buddrus.	KRC
2/18/2024	Examine and analyze [REDACTED] and [REDACTED].	RCP
2/18/2024	Prepare [REDACTED] and [REDACTED].	RCP
2/18/2024	Examine and analyze evidentiary [REDACTED] and [REDACTED].	RCP
2/18/2024	Prepare [REDACTED] and [REDACTED] and [REDACTED].	RCP
2/19/2024	Office conference with Mr. Watts regarding [REDACTED].	JCP
2/19/2024	Revisions to [REDACTED].	WWW

2/19/2024	Further [REDACTED] in Appellant's brief.	WWW
2/19/2024	Review [REDACTED].	KRC
2/19/2024	Revise [REDACTED] portion of the brief.	KRC
2/19/2024	Confer with Mr. Watts.	KRC
2/19/2024	Continue revisions to [REDACTED] and [REDACTED].	KRC
2/19/2024	Prepare [REDACTED].	RCP
2/19/2024	Confer with Ms. Coumanis regarding [REDACTED].	RCP
2/19/2024	Prepare [REDACTED].	RCP
2/19/2024	Examine the [REDACTED] and [REDACTED] to support narrative of facts in appeal brief.	RCP
2/19/2024	Prepare [REDACTED] regarding [REDACTED] and the [REDACTED].	RCP
2/19/2024	Review and revise draft [REDACTED].	RCP
2/19/2024	Office conference with Ms. Palmer regarding [REDACTED].	WWW
2/19/2024	Office conference with Ms. Coumanis regarding [REDACTED] Appellant's Brief [REDACTED].	WWW
2/19/2024	Office conference with Mr. Pipes regarding [REDACTED].	WWW
2/20/2024	Further research regarding [REDACTED].	WWW
2/20/2024	Undertaking research regarding [REDACTED].	WWW
2/20/2024	Undertaking research regarding [REDACTED].	WWW
2/20/2024	Further [REDACTED] Appellant's brief.	WWW
2/20/2024	Continue revisions to [REDACTED] from Mr. Watts.	KRC
2/20/2024	Revise [REDACTED] Mr. Watts.	KRC
2/20/2024	Revise [REDACTED] Mr. Watts.	KRC
2/20/2024	Examine [REDACTED] regarding [REDACTED].	RCP
2/20/2024	Prepare [REDACTED].	RCP

2/20/2024	Prepare [REDACTED]	RCP
2/20/2024	Review and revise [REDACTED]	RCP
2/20/2024	Review and revise draft of appeal brief [REDACTED]	RCP
2/20/2024	Review and revise section of [REDACTED]	RCP
2/20/2024	Prepare section of [REDACTED]	RCP
2/20/2024	Reviewing [REDACTED]	WWW
2/21/2024	[REDACTED] Appellant's Brief.	JCP
2/21/2024	Undertaking research regarding [REDACTED]	WWW
2/21/2024	[REDACTED] Appellant's Brief.	WWW
2/21/2024	[REDACTED] on appeal and [REDACTED]	RCP
2/21/2024	[REDACTED] appeal brief to [REDACTED]	RCP
2/21/2024	Review correspondence from Ms. Coumanis regarding [REDACTED]	RCP
2/21/2024	Meet with Mr. Watts regarding [REDACTED]	RCP
2/21/2024	Revise [REDACTED] from Mr. Watts.	RCP
2/21/2024	Examine [REDACTED] and [REDACTED]	RCP
2/21/2024	Examine [REDACTED] and revise appeal brief to [REDACTED]	RCP
2/22/2024	Legal research regarding Appellant Brief issue [REDACTED]	JCP
2/22/2024	Undertaking research regarding case law relating to [REDACTED]	WWW
2/22/2024	Further review of case law regarding [REDACTED]	WWW
2/22/2024	Final revisions to and review of Appellant's Brief.	WWW

2/22/2024	Revise [REDACTED] in [REDACTED] concerning [REDACTED] and confer with Mr. Watts regarding [REDACTED].	KRC
2/22/2024	[REDACTED] throughout brief.	KRC
2/22/2024	[REDACTED] draft of appeal brief for [REDACTED].	RCP
2/22/2024	Correspond with Mr. Parnell regarding [REDACTED].	RCP
2/22/2024	Examine and analyze [REDACTED].	RCP
2/22/2024	Confer with Ms. Coumanis regarding [REDACTED].	RCP
2/22/2024	[REDACTED] appeal brief with [REDACTED].	RCP
2/22/2024	Examine and analyze [REDACTED] related to [REDACTED] and [REDACTED].	RCP
2/22/2024	Examine and analyze [REDACTED].	RCP
2/22/2024	Meet and confer with Mr. Watts regarding [REDACTED].	RCP
2/22/2024	[REDACTED] appeal brief [REDACTED].	RCP
2/23/2024	Correspond with Mr. Parnell regarding [REDACTED].	RCP
2/27/2024	[REDACTED] PWWSB documents to [REDACTED].	KRC
2/27/2024	Review correspondence regarding [REDACTED].	RCP
	Total	\$69,002.00

SUMMARY OF SERVICES

<u>ATTORNEY</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
JJH Jeffrey J. Hartley	4.00	325.00	1,300.00
JCP J. Casey Pipes	2.50	325.00	812.50
JNN Noelle Neiden	9.70	160.00	1,552.00
KRC Keri R. Coumanis	60.70	300.00	18,210.00
RCP Rachel C. Palmer	70.60	250.00	17,650.00
WWW William W. Watts, III	90.70	325.00	29,477.50

EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Source One Legal Copy, Inc. - Copy of brief.	89.10

Prichard Water Works and Sewer Board
Prichard Water Works/AL Supreme Court Appeal
10840 25249

3/18/2024
134417
Page 9

Westlaw research for February 2024.

1,978.60

Alacourt service charge for February 2024.

9.30

Copying

52.25

Total EXPENSES

\$2,129.25

Total

\$71,131.25

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 135211

4/12/2024

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/AL Supreme Court Appeal

Client No. 10840
Matter No. 25249

Professional Services Rendered for the Period Ending March 31, 2024:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
3/11/2024	Further research regarding [REDACTED] of post appeal proceedings in circuit court below.	WWW
3/11/2024	Undertaking review of [REDACTED].	WWW
3/11/2024	Preparing email to Mr. Parnell regarding [REDACTED].	WWW
3/12/2024	Preparing new argument regarding [REDACTED].	WWW
3/12/2024	Review correspondence regarding [REDACTED].	RCP
3/12/2024	Preparing email to Mr. Parnell regarding [REDACTED].	WWW
3/12/2024	Reviewing [REDACTED] and [REDACTED] and [REDACTED].	WWW
3/12/2024	Reviewing [REDACTED] and [REDACTED].	WWW
3/12/2024	Preparing [REDACTED] Mr. Parnell regarding [REDACTED].	WWW

3/13/2024	Reviewing [REDACTED] and [REDACTED]	WWW
3/14/2024	Review [REDACTED] regarding [REDACTED].	RCP
3/22/2024	Reviewing [REDACTED].	WWW
3/22/2024	Correspond regarding [REDACTED].	RCP
3/25/2024	Telephone call with Mr. Watts regarding [REDACTED].	RCP
3/25/2024	Correspond with Mr. Watts regarding [REDACTED].	RCP
3/25/2024	Correspond with Mr. Watts regarding [REDACTED].	RCP
3/25/2024	Further review of [REDACTED] and review of [REDACTED]; [REDACTED]; Undertaking research regarding [REDACTED]; [REDACTED]; further research regarding [REDACTED].	WWW
3/26/2024	Further research regarding [REDACTED].	WWW
3/26/2024	Examine and analyze [REDACTED].	RCP
3/26/2024	Examine [REDACTED].	RCP
3/26/2024	Incorporate [REDACTED].	RCP
3/27/2024	Last few weeks: work on and coordinate [REDACTED].	JJH
3/27/2024	Commencing preparation of [REDACTED]; [REDACTED] reviewing [REDACTED] and case law [REDACTED]; [REDACTED] further review of [REDACTED]; further research regarding [REDACTED].	WWW
	[REDACTED]; further research regarding [REDACTED].	
	[REDACTED] regarding [REDACTED].	

3/28/2024	Further preparation of [REDACTED] [REDACTED] further research regarding [REDACTED] [REDACTED] research regarding [REDACTED]	WWW
3/29/2024	Further [REDACTED] reply brief.	WWW
	Total	\$17,662.50

SUMMARY OF SERVICES

<u>ATTORNEY</u>		<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
JJH	Jeffery J. Hartley	3.00	325.00	975.00
KRC	Keri R. Coumanis	0.20	300.00	60.00
RCP	Rachel C. Palmer	5.80	250.00	1,450.00
WWW	William W. Watts, III	46.70	325.00	15,177.50

EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
AT&T Teleconference Services - Conference call on 01/18/2024.	11.42
Mobile County Law Library - Copies of case law	2.00
Alacourt service charge for March 2024.	8.10
Westlaw research for March 2024.	870.87
Total EXPENSES	\$892.39

New Charges	\$18,554.89
Previous Balance	\$86,850.08
Balance Due	\$105,404.97

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 135210

4/12/2024

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/Synovus Bank

Client No. 10840
Matter No. 24613

Professional Services Rendered for the Period Ending March 31, 2024:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>	<u>HOURS</u>
1/4/2024	Review of recent [REDACTED].	KTM	0.40
1/4/2024	Correspond with Mr. Hartley regarding [REDACTED].	RCP	0.10
1/4/2024	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.20
1/4/2024	Correspond with Ms. Presley regarding payment of invoice and follow up with co-counsel.	RCP	0.20
1/5/2024	[REDACTED] regarding appellate issues [REDACTED].	JCP	0.20
1/8/2024	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.30
1/8/2024	Correspond with Ms. Presley to provide update on payment of invoice for full transcript of evidentiary hearing.	RCP	0.20
1/9/2024	Review of [REDACTED] and prepare summary of same.	KTM	0.20
1/9/2024	Correspond with Mr. Parnell regarding [REDACTED].	RCP	0.20
1/9/2024	Correspond with Ms. Presley regarding overnight check for invoice related to evidentiary hearing transcript.	RCP	0.20
1/10/2024	Correspond with Mr. Parnell and Ms. Presley regarding received checks for invoices for transcript of evidentiary hearing and record on appeal.	RCP	0.40
1/24/2024	Review of [REDACTED] and prepare summary of same.	KTM	0.20
	Total		2.80
			\$643.00

SUMMARY OF SERVICES

<u>ATTORNEY</u>		<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
JCP	J. Casey Pipes	0.20	325.00	65.00
KTM	Kathy T. Mallette	0.80	160.00	128.00
RCP	Rachel C. Palmer	1.80	250.00	450.00

<u>EXPENSES</u>	
<u>DESCRIPTION</u>	<u>AMOUNT</u>
Westlaw research for December 2023.	125.15
AT&T Teleconference Services - Conference call on 12/05/2023.	25.89
Alacourt service charge for January 2024.	8.10
Westlaw research for January 2024.	17.21
Westlaw research for February 2024.	901.51
Copying	404.00
Copying	260.00
Total EXPENSES	<u>\$1,741.86</u>
New Charges	\$2,384.86
Previous Balance	\$89,480.54
Balance Due	<u>\$91,865.40</u>

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 135553

5/14/2024

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/AL Supreme Court Appeal

Client No. 10840
Matter No. 25249

Professional Services Rendered for the Period Ending April 30, 2024:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>
4/1/2024	[REDACTED] of Reply Brief.	WWW
4/1/2024	Further research regarding [REDACTED] relating to [REDACTED] [REDACTED]	WWW
4/2/2024	[REDACTED] of Reply Brief.	WWW
4/3/2024	[REDACTED] of Reply Brief;	WWW
4/3/2024	Reviewing case law regarding [REDACTED] [REDACTED].	WWW
4/4/2024	[REDACTED] of Reply Brief.	WWW
4/4/2024	Further research relating to [REDACTED] [REDACTED].	WWW
4/4/2024	[REDACTED] and [REDACTED] review of brief.	WWW
	Total	\$11,082.50

SUMMARY OF SERVICES

<u>ATTORNEY</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
WWW William W. Watts, III	34.10	325.00	11,082.50

EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Source One Legal Copy, Inc - Copy/Binding of Reply Brief	33.65
Westlaw research for April 2024.	63.08
Alacourt service charge for April 2024.	0.30
Total EXPENSES	\$97.03

New Charges \$11,179.53

Prichard Water Works and Sewer Board
Prichard Water Works/AL Supreme Court Appeal
10840 25249

5/14/2024
135553
Page 2

Previous Balance	\$105,404.97
Balance Due	<u>\$116,584.50</u>

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 136046

6/17/2024

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/AL Supreme Court Appeal

Client No. 10840
Matter No. 25249

Professional Services Rendered for the Period Ending May 31, 2024:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>
5/17/2024	Review [REDACTED] appeal and Mr. Watts	RCP
	Total	\$0.00

SUMMARY OF SERVICES

<u>ATTORNEY</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
RCP Rachel C. Palmer			0.00

EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Pacer service charge.	47.30
Alacourt service charge for May 2024.	0.80
Total EXPENSES	\$48.10

New Charges	\$48.10
Previous Balance	\$116,584.50
Balance Due	\$116,632.60

HELMSING, LEACH, HERLONG, NEWMAN & ROUSE, P.C.

A PROFESSIONAL CORPORATION

LAWYERS
POST OFFICE BOX 2767
MOBILE, ALABAMA 36652
251/432-5521

Tax Identification Number
63-0709069

Prichard Water Works and Sewer Board

Invoice# 136614

7/12/2024

Client: Prichard Water Works and Sewer Board
Matter: Prichard Water Works/AL Supreme Court Appeal

Client No. 10840
Matter No. 25249

Professional Services Rendered for the Period Ending June 30, 2024:

<u>DATE</u>	<u>SERVICES</u>	<u>ATTY</u>
5/17/2024	Reviewing opinion of Alabama Supreme Court.	WWW
	Total	\$162.50

SUMMARY OF SERVICES

<u>ATTORNEY</u>	<u>HOURS</u>	<u>RATE</u>	<u>AMOUNT</u>
WWW William W. Watts, III	0.50	325.00	162.50

EXPENSES

<u>DESCRIPTION</u>	<u>AMOUNT</u>
Alacourt service charge for June 2024.	0.20
Total EXPENSES	\$0.20

New Charges	\$162.70
Previous Balance	\$116,632.60
Balance Due	\$116,795.30

Exhibit B

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: K. Mark Parnell <parnell@ptlawllc.com>
Sent: Tuesday, January 30, 2024 10:26 AM
To: Conner, Joe <jconner@bakerdonelson.com>
Cc: jjh@helmsinglaw.com
Subject: Re: CV 2023-0901332: Synovus v Water Works and Sewer Board of the City of Prichard

Joe: Our best estimate for a budget for this appeal is \$80,000.00. It would be for this fiscal year.

I will respond separately to your request about my last invoice.

Thanks.

K. Mark Parnell
200 Office Park Drive, Suite 328
Birmingham, AL 35223
O 205.582.2652 | D 205.582.2766
parnell@ptlawllc.com | www.ptlawllc.com



NOTE: This transmission, including any attachments, is intended for the sole use of the addressee(s), and may contain information that by its privileged and confidential nature is exempt from disclosure under applicable law. You are hereby notified that any dissemination, distribution or duplication of this transmission by someone other than the intended recipient or its designated agent is strictly prohibited. If you have received this transmission in error, please notify the sender immediately and destroy all copies of the original message.

From: Conner, Joe <jconner@bakerdonelson.com>
Date: Wednesday, January 17, 2024 at 9:07 AM
To: K. Mark Parnell <parnell@ptlawllc.com>
Subject: FW: CV 2023-0901332: Synovus v Water Works and Sewer Board of the City of Prichard

Hi Mark,

In light of the Judge's ruling regarding payment of the attorney fees incurred by the Board on the pending appeal, could you provide me with a budget for your anticipated legal fees and expenses for the appeal presently pending before the Alabama Supreme Court. If you could break it down to include anticipated fees from January 1, 2024 through the end of the fiscal year (Sept 30, 2024) and then for the first six months of the next fiscal year that would be extremely helpful.

The Receiver needs the estimate to include in the revised budget for the System that he is presently preparing.

In addition in your last invoice, all the time entries were redacted. The Receiver will need to review the entries to confirm that the fees are limited to the representation for the appeal. I will be glad to discuss this with you at your earliest convenience.

Thank you....

Joe A. Conner, Esq.

Baker, Donelson, Bearman, Caldwell & Berkowitz
1900 Republic Centre
633 Chestnut Street
Chattanooga, TN 37450-1800
Direct: 423.752.4417
Cell: 423.605.2780
E-mail: jconner@bakerdonelson.com
www.bakerdonelson.com

Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
represents clients across the U.S. and abroad from
offices in Alabama, Florida, Georgia, Louisiana, Maryland,
Mississippi, North Carolina, South Carolina, Tennessee,
Texas, Virginia and Washington, D.C.

NOTICE: This electronic mail transmission with any attachments may constitute an attorney-client communication, protected health information (PHI) or other confidential information that is in fact confidential, legally protected from disclosure and/or protected by the attorney-client privilege. If you are the intended recipient, please maintain confidentiality and be aware that forwarding this e-mail to others may result in a waiver of these protections and privileges and regardless electronic communications may be at times illegally accessed and viewed. If you are not the intended recipient, this e-mail is not intended for transmission to you, nor to be read, reviewed, used, distributed or even received by you or any other unauthorized persons. If you have received this electronic mail transmission in error, please double delete it from your system immediately without copying, reading or disseminating it, and notify the sender by reply e-mail, so that our address record can be corrected. Thank you very much.