



**Submit Via E-Mail Only –  
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**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

*Attorneys at Law*

Administrative Office  
50 International Drive  
Patewood IV, Suite 300  
Greenville, SC 29615  
Telephone: (864) 241-1801

December 30, 2025

Laura Drewry, Esq.  
City Attorney  
City of Richmond, VA  
900 East Broad Street, Suite 400  
Richmond, VA 23219  
laura.drewry@richmondgov.com

PERSONAL AND CONFIDENTIAL

Bill No. 91741344  
Client.Matter # 029115.000016

**Re: Clay v. City of Richmond, et al.  
PO No. 25000011214**

Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Fees .....\$34,415.50  
Expenses.....\$2,074.52  
**Total Due This Bill.....\$36,490.02**

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #: [REDACTED]	TD Bank	ABA #: [REDACTED]	PO Box 89
300 Delaware Ave	Account #: [REDACTED]	102 South Main St	Account #: [REDACTED]	Columbia, SC 29202
Wilmington, Delaware 19801	Swift Code: NRTHUS33XXX	Greenville, SC 29601		

For Wire Payments, Credit To: Ogletree Deakins Nash Smoak & Stewart and include bill number(s).  
For ACH Payments, Credit To: Ogletree Deakins and include bill numbers(s).  
For Check Payments, make payable to Ogletree Deakins and include bill number(s).  
Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

**Payable upon 30 days.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.

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Date	Initials	Description	Hours	Amount
05/01/25	WRW	Confer with opposing counsel regarding discovery issues and pending discovery motions.	0.50	192.50
05/02/25	WRW	Revise and edit proposed joint motion for protective order governing discovery of confidential information based on items plaintiff's counsel requested during meet and confer.	0.30	115.50
05/02/25	WRW	[REDACTED]	0.50	192.50
05/05/25	WRW	Attend court-ordered telephonic conference with opposing counsel regarding plaintiff's discovery motions and defendants' motion to compel.	1.00	385.00
05/05/25	WRW	[REDACTED]	0.60	231.00
05/06/25	JFR	Response to Motion for Protective order.	8.90	4,183.00
05/06/25	WRW	Communicate with opposing counsel regarding joint protective order and order regarding ADR for submission to court.	0.30	115.50
05/13/25	JFR	Case work-up and development.	7.90	3,713.00
05/13/25	WRW	Communications with opposing counsel regarding outstanding discovery issues and pending discovery motions filed by both parties.	0.60	231.00
05/15/25	WRW	Confer with opposing counsel regarding discovery motions.	0.80	308.00
05/15/25	WRW	[REDACTED]	0.30	115.50

Date	Initials	Description	Hours	Amount
05/16/25	WRW	[REDACTED]	0.30	115.50
05/16/25	WRW	Confer with opposing counsel regarding custodians and search terms for ESI.	0.40	154.00
05/19/25	JFR	Case work-up and development.	8.00	3,760.00
05/19/25	WRW	[REDACTED]	0.20	77.00
05/19/25	WRW	Continue drafting opposition to plaintiff's motion to compel and motion to quash.	4.30	1,655.50
05/20/25	JFR	Case work-up and development.	8.50	3,995.00
05/20/25	WRW	[REDACTED]	2.20	847.00
05/20/25	WRW	Communications with court and opposing counsel regarding sealing orders.	0.40	154.00
05/20/25	WRW	Continue drafting and revise and edit opposition to plaintiff's motion to compel and motion to quash; draft discovery chart for submission to court regarding outstanding discovery requests that plaintiff needs to supplement and/or that the court needs to compel discovery on based on defendants' motion to compel.	2.60	1,001.00
05/20/25	WRW	[REDACTED]	1.80	693.00
05/20/25	WRW	Revise, edit, and finalize defendants' opposition to plaintiff's motion to quash and motion for protective order limiting discovery and related to re-opening of plaintiff's deposition.	0.80	308.00
05/20/25	WRW	[REDACTED]	0.60	231.00
05/20/25	JD	Review and prepare Motions for submission.	4.00	600.00
05/20/25	JM	[REDACTED]	0.30	45.00

Date	Initials	Description	Hours	Amount
05/21/25	JM	[REDACTED]	0.50	75.00
05/22/25	WRW	[REDACTED]	0.60	231.00
05/22/25	WRW	Begin drafting plaintiff's supplemental answers to plaintiff's first set of interrogatories.	1.40	539.00
05/23/25	WRW	[REDACTED]	0.40	154.00
05/23/25	WRW	[REDACTED]	1.10	423.50
05/23/25	WRW	Communicate with opposing counsel regarding ESI culling report and outstanding discovery issues that the parties can agree upon before hearing on various discovery motions filed by both parties.	0.60	231.00
05/23/25	JJT	[REDACTED]	0.10	15.00
05/23/25	JM	[REDACTED]	0.50	75.00
05/25/25	WRW	[REDACTED]	1.10	423.50
05/26/25	WRW	[REDACTED]	1.60	616.00
05/27/25	WRW	Appear for hearing on hearing on defendants' motion to compel and plaintiff's motion to compel, motion to quash, and motion for protective order.	2.10	808.50
05/27/25	CJV	[REDACTED]	0.40	60.00
05/27/25	JD	Issue subpoena to update address for provider in Virginia.	1.00	150.00
05/27/25	JM	[REDACTED]	0.50	75.00
05/28/25	JFR	Case work-up and development.	8.40	3,948.00
05/28/25	WRW	[REDACTED]	0.40	154.00

Date	Initials	Description	Hours	Amount
05/28/25	WRW	[REDACTED]	0.40	154.00
05/28/25	JM	[REDACTED]	0.70	105.00
05/29/25	WRW	[REDACTED]	1.10	423.50
05/29/25	JM	[REDACTED]	0.80	120.00
05/30/25	WRW	[REDACTED]	4.10	1,578.50
05/30/25	WRW	[REDACTED]	0.30	115.50
05/30/25	WRW	[REDACTED]	1.20	462.00
05/30/25	JM	[REDACTED]	0.40	60.00
Total Services:			85.80	34,415.50

#### Timekeeper Summary

Timekeeper	Initials	Title	Rate	Hours	Amount
Jimmy F. Robinson, Jr.	JFR	Shareholder	470.00	41.70	19,599.00
William R. Waddell	WRW	Associate	385.00	34.90	13,436.50
Jessica E. Denver	JD	Paralegal	150.00	5.00	750.00
Jan J. Taylor	JJT	Litigation Support	150.00	0.10	15.00
Christopher VanKirk	CJV	Litigation Support	150.00	0.40	60.00
Jonathon Metcalfe	JM	Litigation Support Case Manager	150.00	3.70	555.00

Description	Expenses	Amount
Express Delivery/Postage	1.00 @ 16.71 ea.	16.71
VENDOR: Planet Depos LLC INVOICE#: 757392 DATE: 5/27/2025		495.00
Planet Depos LLC - Court reporter for Clay v. City of Richmond matter. - on 05/27/25		
Electronic Discovery Management Services provided by Managed Services Vendor.		1,562.81
Processing, Hosting, Review, or Production of Client's electronic records for May 2025.		
Total Expenses		2,074.52
		TOTAL FEES \$34,415.50
		TOTAL EXPENSES \$2,074.52
		TOTAL THIS BILL \$36,490.02



# Ogletree Deakins

Value  
Innovation  
Quality  
Collaboration  
Communication

## CLIENT PLEDGE

In addition to using paper checks, were you aware we can accept your remittances via three other payment methods? We encourage you to select the most convenient option, even if it's different from what you normally use. If you have a question about any of these payment methods or amounts owed, please send your inquiry to [acctsrec@odnss.com](mailto:acctsrec@odnss.com). We promise you will receive a prompt response. Thank you!

### 1. ACH Payment Instructions

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart  
ACH – use CTX file Format & include invoice numbers  
Email remittance to [paymentremittance@ogletree.com](mailto:paymentremittance@ogletree.com)

### 2. Wire Instructions (Within the USA)

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

### Wire Instructions (Outside the USA)

ABA # [REDACTED]

Account # [REDACTED]

Swift Code # NRTHUS33XXX

Credit to: Ogletree Deakins Nash Smoak & Stewart

Would you like to receive our bills by email? Send your request to [Billing2@ogletreedekins.com](mailto:Billing2@ogletreedekins.com)



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PERSONAL AND CONFIDENTIAL

Bill No. 91766725  
Client.Matter # 029115.000016

**Re: Clay v. City of Richmond, et al.  
PO No. 25000011214**

Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Fees .....\$25,287.50  
Expenses.....\$1,466.23  
**Total Due This Bill.....\$26,753.73**

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #: [REDACTED]	TD Bank	ABA #: [REDACTED]	PO Box 89
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Wilmington, Delaware 19801	Swift Code: NRTHUS33XXX	Greenville, SC 29601		

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Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

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Date	Initials	Description	Hours	Amount
06/02/25	WRW	[REDACTED]	1.10	423.50
06/02/25	JA	Initial relativity training for FOIA documents.	0.50	75.00
06/02/25	JM	[REDACTED]	0.30	45.00
06/03/25	JA	[REDACTED]	2.00	300.00
06/04/25	WRW	[REDACTED]	3.10	1,193.50
06/04/25	JA	[REDACTED]	3.00	450.00
06/04/25	JD	[REDACTED]	1.00	150.00
06/05/25	JA	[REDACTED]	3.00	450.00
06/05/25	JA	[REDACTED]	2.00	300.00
06/05/25	JD	[REDACTED]	5.00	750.00
06/06/25	WRW	[REDACTED]	4.20	1,617.00

Date	Initials	Description	Hours	Amount
		[REDACTED]		
06/09/25	WRW	Communications with Court regarding in-camera review of Burks personnel file.	0.30	115.50
06/09/25	WRW	Communicate with opposing counsel regarding Burks personnel file.	0.20	77.00
06/09/25	JD	[REDACTED]	2.00	300.00
06/10/25	WRW	[REDACTED]	1.30	500.50
06/11/25	WRW	[REDACTED]	1.70	654.50
06/11/25	WRW	[REDACTED]	0.20	77.00
06/12/25	WRW	[REDACTED]	2.20	847.00
06/12/25	JM	[REDACTED]	1.10	165.00
06/15/25	WRW	[REDACTED]	4.20	1,617.00
06/16/25	WRW	[REDACTED]	4.90	1,886.50
06/16/25	WRW	Communicate with opposing counsel regarding Plaintiff's request to amend complaint to remove certain damage components to avoid additional discovery on those issues.	0.40	154.00
06/16/25	WRW	[REDACTED]	0.20	77.00
06/16/25	WRW	Communicate with plaintiff's counsel regarding discovery status conference.	0.20	77.00
06/16/25	JM	[REDACTED]	0.30	45.00

Date	Initials	Description	Hours	Amount
06/17/25	WRW	Communicate with plaintiff's counsel regarding missing attachments from emails produced with plaintiff's second supplemental document production.	0.40	154.00
06/17/25	WRW	[REDACTED]	1.50	577.50
06/17/25	WRW	Attend plaintiff's deposition.	3.50	1,347.50
06/17/25	WRW	[REDACTED]	0.20	77.00
06/17/25	CJV	[REDACTED]	0.30	45.00
06/17/25	JA	Deposition of Connie Clay.	3.00	450.00
06/17/25	JM	[REDACTED]	0.80	120.00
06/18/25	WRW	[REDACTED]	0.40	154.00
06/18/25	WRW	[REDACTED]	0.80	308.00
06/18/25	CJV	[REDACTED]	0.40	60.00
06/18/25	JM	[REDACTED]	0.30	45.00
06/19/25	WRW	Communicate with opposing counsel regarding supplemental document production.	0.30	115.50
06/19/25	WRW	[REDACTED]	0.40	154.00
06/24/25	WRW	Communicate with opposing counsel regarding expert witness designations.	0.40	154.00
06/24/25	WRW	[REDACTED]	1.30	500.50
06/24/25	WRW	Call with opposing counsel to confer regarding alleged deficiencies in supplemental document production.	0.80	308.00
06/24/25	JA	[REDACTED]	0.50	75.00
06/24/25	JD	Send Health Attestation to follow-up regarding	1.00	150.00

Date	Initials	Description	Hours	Amount
		subpoena of medical records.		
06/25/25	WRW	[REDACTED]	0.50	192.50
06/25/25	WRW	[REDACTED]	0.50	192.50
06/25/25	WRW	Communicate with opposing counsel regarding depositions and alleged issues with City's supplemental document production.	0.80	308.00
06/26/25	WRW	[REDACTED]	0.20	77.00
06/26/25	WRW	[REDACTED]	0.20	77.00
06/26/25	WRW	[REDACTED]	0.40	154.00
06/26/25	WRW	Confer with opposing counsel regarding expert deadlines, depositions, and purported deficiencies with City's supplemental document production.	0.70	269.50
06/26/25	WRW	[REDACTED]	0.60	231.00
06/26/25	WRW	[REDACTED]	0.30	115.50
06/27/25	WRW	Draft supplemental interrogatory answers.	2.00	770.00
06/27/25	WRW	[REDACTED]	0.30	115.50
06/27/25	WRW	[REDACTED]	0.40	154.00
06/30/25	JFR	[REDACTED]	2.40	1,128.00
06/30/25	JFR	[REDACTED]	0.40	188.00
06/30/25	JFR	[REDACTED]	0.60	282.00
06/30/25	JFR	[REDACTED]	3.70	1,739.00
06/30/25	WRW	Attend court required discovery status hearing.	1.80	693.00
06/30/25	WRW	[REDACTED]	0.20	77.00

Date	Initials	Description	Hours	Amount
		[REDACTED]		
06/30/25	WRW	[REDACTED]	0.30	115.50
06/30/25	WRW	[REDACTED]	0.20	77.00
06/30/25	WRW	[REDACTED]	1.40	539.00
06/30/25	WRW	Draft Defendant Burks' first set of discovery to plaintiff; begin drafting City's Second Request for Production of Documents; [REDACTED]	1.30	500.50
06/30/25	JD	[REDACTED]	1.00	150.00
Total Services:			80.90	25,287.50

#### Timekeeper Summary

Timekeeper	Initials	Title	Rate	Hours	Amount
Jimmy F. Robinson, Jr.	JFR	Shareholder	470.00	7.10	3,337.00
William R. Waddell	WRW	Associate	385.00	46.30	17,825.50
Jessica E. Denver	JD	Paralegal	150.00	10.00	1,500.00
Christopher VanKirk	CJV	Litigation Support	150.00	0.70	105.00
Jonathon Metcalfe	JM	Litigation Support	150.00	2.80	420.00
Jurnee A. Agbowu	JA	Case Manager Law Clerk	150.00	14.00	2,100.00

#### Expenses

Description	Amount
VENDOR: Epiq eDiscovery Solutions, Inc.- AZ INVOICE#: 90975025 DATE: 6/8/2025	472.50
Epiq eDiscovery Solutions, Inc.- AZ - 029115-000016- Forensic Services for the month of May 2025 - on 06/08/25	
Electronic Discovery Management Services provided by Managed Services Vendor.	993.73
Processing, Hosting, Review, or Production of Client's electronic records for June 2025.	
Total Expenses	1,466.23

TOTAL FEES	\$25,287.50
TOTAL EXPENSES	\$1,466.23

TOTAL THIS BILL	\$26,753.73
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## CLIENT PLEDGE

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ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

ACH – use CTX file Format & include invoice numbers

Email remittance to [paymentremittance@ogletree.com](mailto:paymentremittance@ogletree.com)

### 2. Wire Instructions (Within the USA)

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

### Wire Instructions (Outside the USA)

ABA # [REDACTED]

Account # [REDACTED]

Swift Code # NRTHUS33XXX

Credit to: Ogletree Deakins Nash Smoak & Stewart

Would you like to receive our bills by email? Send your request to [Billing2@ogletreedekins.com](mailto:Billing2@ogletreedekins.com)



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Fees .....\$36,777.50  
Expenses.....\$4,325.10  
**Total Due This Bill.....\$41,102.60**

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #: [REDACTED]	TD Bank	ABA #: [REDACTED]	PO Box 89
300 Delaware Ave	Account #: [REDACTED]	102 South Main St	Account #: [REDACTED]	Columbia, SC 29202
Wilmington, Delaware 19801	Swift Code: NRTHUS33XXX	Greenville, SC 29601		

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For ACH Payments, Credit To: Ogletree Deakins and include bill numbers(s).  
For Check Payments, make payable to Ogletree Deakins and include bill number(s).  
Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

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Date	Initials	Description	Hours	Amount
07/01/25	JFR	Strategy and work-up on next steps.	0.90	423.00
07/01/25	SAS	[REDACTED]	0.20	94.00
07/01/25	WRW	Draft supplemental discovery requests to Plaintiff.	2.30	885.50
07/01/25	WRW	[REDACTED]	0.40	154.00
07/02/25	WRW	Communicate with opposing counsel regarding deposition notices.	0.30	115.50
07/02/25	WRW	Communicate with opposing counsel regarding supplemental discovery requests and Plaintiff's past due expert disclosures.	0.40	154.00
07/02/25	JD	[REDACTED]	2.00	300.00
07/02/25	ML	[REDACTED]	1.30	195.00
07/03/25	JFR	Strategy and work-up on next steps [REDACTED].	3.70	1,739.00
07/03/25	WRW	[REDACTED]	0.30	115.50
07/03/25	JD	[REDACTED]	1.00	150.00
07/07/25	TJ	[REDACTED]	2.50	375.00

Date	Initials	Description	Hours	Amount
		[REDACTED]		
07/09/25	JFR	Strategy and work-up on next steps.	9.80	4,606.00
07/11/25	WRW	[REDACTED]	0.80	308.00
07/21/25	WRW	[REDACTED]	1.60	616.00
07/21/25	WRW	Draft objections and written responses to Plaintiff's second requests for production of documents; review and analyze case documents to designate corresponding document production.	3.60	1,386.00
07/22/25	JFR	Strategy and work-up on next steps.	11.70	5,499.00
07/22/25	WRW	[REDACTED]	0.30	115.50
07/22/25	WRW	Oppose plaintiff's motion to compel location of Petula Burks' deposition.	4.10	1,578.50
07/22/25	WRW	[REDACTED]	0.30	115.50
07/22/25	WRW	Communicate with opposing counsel regarding requested depositions and other case issues raised by Plaintiff.	0.40	154.00
07/23/25	SAS	[REDACTED]	0.30	141.00
07/23/25	WRW	[REDACTED]	0.20	77.00
07/23/25	WRW	Communicate with Court regarding Plaintiff's motion to compel location of Burks deposition.	0.40	154.00
07/23/25	WRW	[REDACTED]	1.20	462.00
07/23/25	JA	[REDACTED]	1.00	150.00
07/23/25	JA	[REDACTED]	3.00	450.00
07/23/25	JD	Filed paperwork in person at Circuit Court.	1.00	150.00
07/24/25	WRW	Begin drafting deficiency letter to opposing counsel regarding plaintiff's responses to defendants' second set of written discovery requests.	0.60	231.00
07/24/25	WRW	[REDACTED]	2.20	847.00

Date	Initials	Description	Hours	Amount
		[REDACTED]		
07/24/25	WRW	Continue drafting objections and written responses to Plaintiff's second requests for production of documents.	1.30	500.50
07/24/25	WRW	Revise and edit written responses to Plaintiff's first requests for production of documents.	1.20	462.00
07/24/25	WRW	[REDACTED]	0.60	231.00
07/24/25	EH	[REDACTED]	0.60	90.00
07/24/25	EH	[REDACTED]	0.10	15.00
07/24/25	EH	[REDACTED]	0.10	15.00
07/24/25	EH	[REDACTED]	1.10	165.00
07/24/25	JA	[REDACTED]	3.00	450.00
07/25/25	WRW	Revise and edit motion for order restricting communications related to Plaintiff's series of FOIA requests intended to circumvent current protective order; begin drafting corresponding motion for protective order relating to Plaintiff's second requests for production of documents, the majority of which seek duplicative information sought in Plaintiff's recent FOIA requests.	2.60	1,001.00
07/28/25	WRW	[REDACTED]	0.40	154.00
07/28/25	WRW	[REDACTED]	0.20	77.00
07/28/25	WRW	[REDACTED]	3.30	1,270.50
07/28/25	WRW	Revise, edit, and finalize objections and written responses to Plaintiff's second requests for	1.80	693.00

Date	Initials	Description	Hours	Amount
		production of documents.		
07/28/25	WRW	[REDACTED]	0.90	346.50
07/29/25	WRW	[REDACTED]	0.60	231.00
07/29/25	WRW	[REDACTED]	1.80	693.00
07/29/25	WRW	[REDACTED]	0.30	115.50
07/29/25	WRW	[REDACTED]	0.40	154.00
07/30/25	JFR	Strategy and work-up on next steps including attendance a hearing. .	9.90	4,653.00
07/30/25	WRW	Appear for discovery hearing.	1.50	577.50
07/30/25	WRW	Draft required discovery report ordered by Court.	1.20	462.00
07/30/25	WRW	[REDACTED]	1.50	577.50
07/30/25	WRW	[REDACTED]	0.20	77.00
07/30/25	WRW	[REDACTED]	0.50	192.50
07/31/25	JFR	Strategy and work-up on next steps.	3.90	1,833.00
Total Services:			96.80	36,777.50

#### Timekeeper Summary

Timekeeper	Initials	Title	Rate	Hours	Amount
Jimmy F. Robinson, Jr.	JFR	Shareholder	470.00	39.90	18,753.00
Scott A. Siegner	SAS	Shareholder	470.00	0.50	235.00
William R. Waddell	WRW	Associate	385.00	39.70	15,284.50
Jessica E. Denver	JD	Paralegal	150.00	4.00	600.00
Jurnee A. Agbowu	JA	Law Clerk	150.00	7.00	1,050.00
Erroll Q. Headen	EH	Law Clerk	150.00	1.90	285.00
Michael Lehet	ML	Other	150.00	1.30	195.00
Tahari Johnson	TJ	Other	150.00	2.50	375.00

#### Expenses

Description	Amount
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Description	Amount
Computer Research-Lexis 1.00 @ 5.31 ea.	5.31
Computer Research-Westlaw 2.00 @ 259.20 ea.	518.40
VENDOR: Planet Depos LLC INVOICE#: 766141 DATE: 7/1/2025	1,234.75
Planet Depos LLC - Transcript with Index of Connie Clay, Volume 2 for the Clay v. City of Richmond matter. - on 06/17/25 - Connie Clay, Volume 2	
VENDOR: Planet Depos LLC INVOICE#: 766142 DATE: 7/1/2025	886.50
Planet Depos LLC - Videography services in the Clay v. City of Richmond matter. - on 06/17/25	
Electronic Discovery Management Services provided by Managed Services Vendor. Processing, Hosting, Review, or Production of Client's electronic records for July 2025.	1,185.14
VENDOR: Planet Depos LLC INVOICE#: 774490 DATE: 7/31/2025	495.00
Planet Depos LLC - Court reporter for in the Clay v City of Richmond matter. - on 07/30/25	
Total Expenses	4,325.10
TOTAL FEES TOTAL EXPENSES TOTAL THIS BILL	\$36,777.50 \$4,325.10 \$41,102.60



# Ogletree Deakins

Value  
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Quality  
Collaboration  
Communication

## CLIENT PLEDGE

In addition to using paper checks, were you aware we can accept your remittances via three other payment methods? We encourage you to select the most convenient option, even if it's different from what you normally use. If you have a question about any of these payment methods or amounts owed, please send your inquiry to [acctsrec@odnss.com](mailto:acctsrec@odnss.com). We promise you will receive a prompt response. Thank you!

### 1. ACH Payment Instructions

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart  
ACH – use CTX file Format & include invoice numbers  
Email remittance to [paymentremittance@ogletree.com](mailto:paymentremittance@ogletree.com)

### 2. Wire Instructions (Within the USA)

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

### Wire Instructions (Outside the USA)

ABA # [REDACTED]

Account # [REDACTED]

Swift Code # NRTHUS33XXX

Credit to: Ogletree Deakins Nash Smoak & Stewart

Would you like to receive our bills by email? Send your request to [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



**Submit Via E-Mail Only –  
Do Not Send Hard Copy**

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

*Attorneys at Law*

Administrative Office  
50 International Drive  
Patewood IV, Suite 300  
Greenville, SC 29615  
Telephone: (864) 241-1801

December 30, 2025

Laura Drewry, Esq.  
City Attorney  
City of Richmond, VA  
900 East Broad Street, Suite 400  
Richmond, VA 23219  
laura.drewry@richmondgov.com

PERSONAL AND CONFIDENTIAL

Bill No. 91766723  
Client.Matter # 029115.000016

**Re: Clay v. City of Richmond, et al.  
PO No. 25000011214**

Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Fees .....\$48,471.50  
Expenses.....\$1,035.58  
**Total Due This Bill.....\$49,507.08**

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #: [REDACTED]	TD Bank	ABA #: [REDACTED]	PO Box 89
300 Delaware Ave	Account #: [REDACTED]	102 South Main St	Account #: [REDACTED]	Columbia, SC 29202
Wilmington, Delaware 19801	Swift Code: NRTHUS33XXX	Greenville, SC 29601		

For Wire Payments, Credit To: Ogletree Deakins Nash Smoak & Stewart and include bill number(s).  
For ACH Payments, Credit To: Ogletree Deakins and include bill numbers(s).  
For Check Payments, make payable to Ogletree Deakins and include bill number(s).  
Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

**Payable upon 30 days.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.

Laura Drewry, Esq.  
City Attorney  
City of Richmond, VA  
900 East Broad Street, Suite 400  
Richmond, VA 23219  
laura.drewry@richmondgov.com

**Re: Clay v. City of Richmond, et al.**  
**PO No. 25000011214**

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Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Date	Initials	Description	Hours	Amount
08/01/25	JFR	Strategy and work-up on next steps.	3.80	1,786.00
08/04/25	JFR	[REDACTED]	2.90	1,363.00
08/05/25	JFR	Follow-up on FOIA requests.	2.80	1,316.00
08/06/25	JFR	[REDACTED]	3.80	1,786.00
08/08/25	JFR	Discovery issues and work-up.	4.80	2,256.00
08/08/25	WRW	Communications with opposing counsel regarding discovery disputes and objections to Plaintiff's proposed Rule 4:5(b)(6) deposition topics.	2.30	885.50
08/11/25	JFR	[REDACTED]	1.90	893.00
08/11/25	JFR	[REDACTED]	2.90	1,363.00
08/14/25	WRW	[REDACTED]	0.40	154.00
08/15/25	WRW	[REDACTED]	0.30	115.50
08/18/25	JFR	[REDACTED]	3.80	1,786.00
08/18/25	JFR	Meet and Confer Session w/ Opposing Counsel.	1.30	611.00
08/18/25	WRW	Confer regarding Rule 4:5(b)(6) notice and plaintiff's motion to compel.	1.50	577.50
08/18/25	WRW	[REDACTED]	0.20	77.00



Date	Initials	Description	Hours	Amount
08/20/25	JFR	[REDACTED].	2.30	1,081.00
08/20/25	JFR	Attend the Deposition of G. Westry.	3.50	1,645.00
08/20/25	WRW	Attend Gerald Westry Deposition.	4.00	1,540.00
08/20/25	WRW	Draft answer and affirmative defenses to plaintiff's first amended complaint.	2.20	847.00
08/20/25	WRW	[REDACTED].	0.50	192.50
08/22/25	WRW	[REDACTED].	0.30	115.50
08/22/25	WRW	Communicate with Plaintiff's counsel regarding revisions to Plaintiff's proposed Rule 4:5(b)(6) deposition topics, noting issues with proposed topics.	0.60	231.00
08/25/25	JFR	[REDACTED].	3.90	1,833.00
08/25/25	JFR	Hearing on Motion to Compel and Bifurcation.	2.90	1,363.00
08/25/25	JFR	Follow-up on Judge's order post-hearing on Motion to Bifurcate and Motion to Compel.	2.50	1,175.00
08/25/25	WRW	[REDACTED].	0.20	77.00
08/25/25	WRW	Develop strategy for [REDACTED].	0.70	269.50
08/25/25	WRW	Develop litigation strategy [REDACTED].	0.60	231.00
08/25/25	WRW	[REDACTED].	0.50	192.50
08/25/25	WRW	Begin drafting opposition to Plaintiff's motion to bifurcate liability and damages components of trial.	2.10	808.50
08/26/25	WRW	Continue draft and revise, edit, and finalize opposition to Plaintiff's motion to bifurcate.	5.50	2,117.50
08/26/25	WRW	[REDACTED].	0.80	308.00
08/26/25	JD	[REDACTED].	2.00	300.00
08/27/25	JFR	Communications with counsel at Deposition of Witnesses.	2.90	1,363.00
08/27/25	JFR	[REDACTED].	3.90	1,833.00
08/27/25	WRW	[REDACTED].	3.10	1,193.50
08/27/25	WRW	[REDACTED].	1.10	423.50

Date	Initials	Description	Hours	Amount
		[REDACTED]		
08/27/25	WRW	[REDACTED]	0.70	269.50
08/27/25	WRW	[REDACTED]	0.40	154.00
08/27/25	JD	[REDACTED]	3.00	450.00
08/28/25	WRW	[REDACTED]	0.30	115.50
08/28/25	WRW	[REDACTED]	0.40	154.00
08/28/25	JD	[REDACTED]	2.00	300.00
08/29/25	JFR	[REDACTED]	1.90	893.00
08/29/25	WRW	Begin drafting motion in limine and memorandum for bench trial on all triable issues.	3.80	1,463.00
08/29/25	WRW	[REDACTED]	0.60	231.00
08/29/25	WRW	[REDACTED]	0.50	192.50
08/29/25	WRW	[REDACTED]	1.30	500.50
08/29/25	WRW	Develop litigation strategy, [REDACTED]	0.80	308.00
08/29/25	WRW	Communicate with opposing counsel regarding forthcoming motions in limine.	0.40	154.00
08/29/25	EH	Confer with Attorney Ryan Waddell regarding case strategy and proceeding.	0.40	60.00
08/29/25	EH	Begin case review and document analysis and organization.	1.00	150.00
08/29/25	JD	Coordinate with team regarding update of case and prepare for trial.	1.50	225.00
08/30/25	JFR	Memorandum in Support of Motion in Limine to Exclude Expert.	6.80	3,196.00
08/31/25	JFR	Drafting of Motion in Limine and Supporting Memorandum to Exclude Late Expert Report of Robert Cook.	11.80	5,546.00
Total Services:			116.40	48,471.50

**Timekeeper Summary**

Timekeeper	Initials	Title	Rate	Hours	Amount
Jimmy F. Robinson, Jr.	JFR	Shareholder	470.00	70.40	33,088.00

Timekeeper	Initials	Title	Rate	Hours	Amount
William R. Waddell	WRW	Associate	385.00	36.10	13,898.50
Jessica E. Denver	JD	Paralegal	150.00	8.50	1,275.00
Evelyn Henschel	EH	Paralegal	150.00	1.40	210.00

### Expenses

Description	Amount
VENDOR: Richmond Express Courier Service INVOICE#: 1953-8185 DATE: 8/5/2025	25.94
Richmond Express Courier Service - Courier delivered documents to Richmond Circuit Court. - on 07/30/25	
Electronic Discovery Management Services provided by Managed Services Vendor. Processing, Hosting, Review, or Production of Client's electronic records for August 2025.	1,009.64
Total Expenses	1,035.58

TOTAL FEES	\$48,471.50
TOTAL EXPENSES	\$1,035.58
TOTAL THIS BILL	\$49,507.08



# Ogletree Deakins

Value  
Innovation  
Quality  
Collaboration  
Communication

## CLIENT PLEDGE

In addition to using paper checks, were you aware we can accept your remittances via three other payment methods? We encourage you to select the most convenient option, even if it's different from what you normally use. If you have a question about any of these payment methods or amounts owed, please send your inquiry to [acctsrec@odnss.com](mailto:acctsrec@odnss.com). We promise you will receive a prompt response. Thank you!

### 1. ACH Payment Instructions

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart  
ACH – use CTX file Format & include invoice numbers  
Email remittance to [paymentremittance@ogletree.com](mailto:paymentremittance@ogletree.com)

### 2. Wire Instructions (Within the USA)

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

### Wire Instructions (Outside the USA)

ABA # [REDACTED]

Account # [REDACTED]

Swift Code # NRTHUS33XXX

Credit to: Ogletree Deakins Nash Smoak & Stewart

Would you like to receive our bills by email? Send your request to [Billing2@ogletreedekins.com](mailto:Billing2@ogletreedekins.com)



**Submit Via E-Mail Only –  
Do Not Send Hard Copy**

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

*Attorneys at Law*

Administrative Office  
50 International Drive  
Patewood IV, Suite 300  
Greenville, SC 29615  
Telephone: (864) 241-1801

December 30, 2025

Laura Drewry, Esq.  
City Attorney  
City of Richmond, VA  
900 East Broad Street, Suite 400  
Richmond, VA 23219  
laura.drewry@richmondgov.com

PERSONAL AND CONFIDENTIAL

Bill No. 91766722  
Client.Matter # 029115.000016

**Re: Clay v. City of Richmond, et al.  
PO No. 25000011214**

Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Fees .....\$135,926.00  
Expenses.....\$12,587.62  
**Total Due This Bill.....\$148,513.62**

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #: [REDACTED]	TD Bank	ABA #: [REDACTED]	PO Box 89
300 Delaware Ave	Account #: [REDACTED]	102 South Main St	Account #: [REDACTED]	Columbia, SC 29202
Wilmington, Delaware 19801	Swift Code: NRTHUS33XXX	Greenville, SC 29601		

For Wire Payments, Credit To: Ogletree Deakins Nash Smoak & Stewart and include bill number(s).  
For ACH Payments, Credit To: Ogletree Deakins and include bill numbers(s).  
For Check Payments, make payable to Ogletree Deakins and include bill number(s).  
Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

**Payable upon 30 days.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.

Laura Drewry, Esq.  
City Attorney  
City of Richmond, VA  
900 East Broad Street, Suite 400  
Richmond, VA 23219  
laura.drewry@richmondgov.com

**Re: Clay v. City of Richmond, et al.**  
**PO No. 25000011214**

Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Date	Initials	Description	Hours	Amount
09/01/25	JFR	Finalization of Motions in Limine for upcoming trial.	6.70	3,149.00
09/01/25	WRW	Draft motion in limine to exclude expert designations based on untimely disclosures by Plaintiff.	2.30	885.50
09/02/25	JFR	Prep of Trial Motions.	3.90	1,833.00
09/02/25	WRW	Draft memorandum in support of motion in limine to exclude economist designate by Plaintiff.	6.30	2,425.50
09/02/25	WRW	Begin drafting response to Plaintiff's list of purported documents not produced during discovery.	1.20	462.00
09/02/25	WRW	[REDACTED]	1.10	423.50
09/02/25	WRW	Continue drafting, revise, edit, and finalize motion in limine requested bench trial.	2.10	808.50
09/02/25	EH	[REDACTED]	5.80	870.00
09/02/25	JD	[REDACTED]	5.00	750.00
09/03/25	JFR	Emails back and forth w/ Counsel regarding depositions and other discovery issues.	1.80	846.00
09/03/25	JFR	Follow-up on Plaintiff's List of Communications and Documents Not Produced.	2.70	1,269.00

Date	Initials	Description	Hours	Amount
09/03/25	WRW	[REDACTED]	0.30	115.50
09/03/25	WRW	Develop strategy for [REDACTED]	0.60	231.00
09/03/25	EH	[REDACTED]	1.80	270.00
09/03/25	EH	[REDACTED]	0.40	60.00
09/03/25	EH	Draft Defendants' Trial Witness and Exhibit List.	1.20	180.00
09/03/25	EH	[REDACTED]	0.40	60.00
09/03/25	EH	[REDACTED]	4.50	675.00
09/03/25	JD	[REDACTED]	6.00	900.00
09/03/25	JM	[REDACTED]	0.60	90.00
09/04/25	JFR	Trial Prep for upcoming trial.	2.90	1,363.00
09/04/25	WRW	Prepare witness and exhibit lists.	1.20	462.00
09/04/25	WRW	Confer with opposing counsel regarding motions.	0.60	231.00
09/04/25	WRW	[REDACTED]	0.70	269.50
09/04/25	WRW	[REDACTED]	0.80	308.00
09/04/25	WRW	[REDACTED]	1.10	423.50
09/04/25	WRW	[REDACTED]	1.20	462.00
09/04/25	WRW	[REDACTED]	0.30	115.50
09/04/25	EH	Update Defendant's Witness and Exhibit List.	0.30	45.00
09/04/25	EH	[REDACTED]	0.50	75.00
09/04/25	EH	Confer with Attorney Jimmy Robinson and Ryan Waddell regarding trial strategy and [REDACTED]	0.60	90.00
09/04/25	EH	[REDACTED]	3.60	540.00
09/04/25	JD	[REDACTED]	6.00	900.00

Date	Initials	Description	Hours	Amount
09/04/25	JM	[REDACTED]	0.50	75.00
09/05/25	JFR	Defend Depositions (Timeko Hunte-Brown) and Sabrina Joy-Hogg.	6.70	3,149.00
09/05/25	JFR	Prepare follow-up on discovery responses.	3.80	1,786.00
09/05/25	WRW	Defend deposition of T. Hume-Brown.	1.30	500.50
09/05/25	WRW	Defend deposition of S. Joxy-Hogg.	4.30	1,655.50
09/05/25	WRW	Revise and edit written responses to Plaintiff's requests for production of documents; supplement defendants' document production.	3.80	1,463.00
09/05/25	WRW	Revise, edit, and finalize court ordered written response to plaintiff's list of purported documents not produced during discovery.	1.10	423.50
09/05/25	JD	[REDACTED]	4.00	600.00
09/08/25	JFR	[REDACTED]	1.70	799.00
09/08/25	JFR	[REDACTED]	3.40	1,598.00
09/08/25	JFR	Witness and Exhibit List review, edits and inclusions.	1.40	658.00
09/08/25	JFR	Draft Reply Memorandum to Motion in Limine on Bench Trial issue.	2.80	1,316.00
09/08/25	WRW	[REDACTED]	2.80	1,078.00
09/08/25	WRW	[REDACTED]	1.30	500.50
09/08/25	WRW	[REDACTED]	0.60	231.00
09/08/25	EH	Confer with legal team and discuss strategy for [REDACTED]	0.30	45.00
09/08/25	EH	[REDACTED]	1.20	180.00
09/08/25	JD	[REDACTED]	5.00	750.00
09/08/25	JD	File witness and exhibit list with the court.	1.00	150.00
09/09/25	JFR	[REDACTED]	1.90	893.00
09/09/25	JFR	Deposition of Petula Burks.	8.70	4,089.00
09/09/25	JFR	Finalization of Reply Brief in Support of Motion in Limine for Bench Trial.	3.70	1,739.00
09/09/25	WRW	Attend portion of Petula Burks deposition.	4.00	1,540.00
09/09/25	WRW	Revise and edit reply in support of motion in limine	0.60	231.00



Date	Initials	Description	Hours	Amount
		in support of bench trial.		
09/09/25	EH	[REDACTED]	1.20	180.00
09/09/25	EH	[REDACTED]	5.40	810.00
09/09/25	JD	File in person Reply Motion with the Court.	1.00	150.00
09/09/25	KK	[REDACTED]	0.50	75.00
09/10/25	JFR	Deposition of Sheila White.	3.60	1,692.00
09/10/25	JFR	[REDACTED]	2.60	1,222.00
09/10/25	JFR	Deposition of Petula Burks including irregularities and back and forward w/ Court.	2.80	1,316.00
09/10/25	JFR	[REDACTED]	2.40	1,128.00
09/10/25	WRW	Defend SW deposition.	3.50	1,347.50
09/10/25	WRW	Return travel from SW deposition.	1.60	616.00
09/10/25	WRW	[REDACTED]	0.60	231.00
09/10/25	WRW	[REDACTED]	0.90	346.50
09/10/25	WRW	Draft miscellaneous motions in limine.	4.40	1,694.00
09/10/25	WRW	[REDACTED]	0.60	231.00
09/10/25	EH	[REDACTED]	4.60	690.00
09/11/25	JFR	Prep, revise and add to Motions in Limine.	3.80	1,786.00
09/11/25	JFR	[REDACTED]	0.70	329.00
09/11/25	WRW	Begin drafting opposition to Plaintiff's motion to strike and motions in limine.	3.40	1,309.00
09/11/25	WRW	Communicate with court regarding technology request for use at hearing.	0.30	115.50
09/11/25	WRW	[REDACTED]	0.30	115.50
09/11/25	WRW	[REDACTED]	1.20	462.00
09/11/25	EH	[REDACTED]	1.60	240.00
09/11/25	JD	[REDACTED]	5.00	750.00

Date	Initials	Description	Hours	Amount
09/12/25	JFR	Prep for upcoming trial.	3.90	1,833.00
09/12/25	WRW	[REDACTED]	1.10	423.50
09/12/25	WRW	[REDACTED]	1.40	539.00
09/12/25	EH	[REDACTED]	1.40	210.00
09/12/25	EH	Confer with Attorney Ryan Wadell regarding trial strategy.	0.40	60.00
09/12/25	JD	[REDACTED]	4.00	600.00
09/14/25	JFR	Trial Prep.	4.90	2,303.00
09/15/25	JFR	Prep for Trial including Motions in Limine.	3.90	1,833.00
09/15/25	WRW	[REDACTED]	0.30	115.50
09/15/25	WRW	[REDACTED]	0.60	231.00
09/15/25	WRW	Develop litigation and trial strategy.	1.50	577.50
09/15/25	WRW	[REDACTED]	1.10	423.50
09/15/25	WRW	[REDACTED]	3.10	1,193.50
09/15/25	EH	Begin drafting objections to Plaintiff's trial exhibits.	1.80	270.00
09/15/25	EH	[REDACTED]	3.60	540.00
09/15/25	EH	Draft summary index of Plaintiff's trial exhibits for purposes of drafting objections.	1.80	270.00
09/15/25	EH	Confer with Attorney Jimmy Robinson and Ryan Waddell regarding trial strategy [REDACTED]	0.50	75.00
09/15/25	EH	[REDACTED]	2.60	390.00
09/15/25	JD	Trial prep.	5.00	750.00

Date	Initials	Description	Hours	Amount
09/15/25	KK	[REDACTED]	1.00	150.00
09/16/25	JFR	Prep of several motions in opposition to Plaintiffs' Motions. (6.5) [REDACTED] and trial (3.3).	9.80	4,606.00
09/16/25	WRW	Continue drafting opposition to plaintiff's omnibus motion in limine and motion to strike.	6.20	2,387.00
09/16/25	WRW	Draft objections to Plaintiff's exhibit list to submit by scheduling order deadline.	2.60	1,001.00
09/16/25	WRW	[REDACTED]	1.10	423.50
09/16/25	EH	Continue drafting objections to Plaintiff's 124 trial exhibits.	6.80	1,020.00
09/16/25	EH	Prepare trial documents identified in Defendants' exhibit list.	1.20	180.00
09/16/25	EH	[REDACTED]	0.40	60.00
09/16/25	JD	Trial prep.	8.00	1,200.00
09/17/25	JFR	[REDACTED] (4.70) [REDACTED] (4.90) Prepare for Trial [REDACTED] (3.9).	13.50	6,345.00
09/17/25	WRW	[REDACTED]	2.20	847.00
09/17/25	WRW	[REDACTED]	2.20	847.00
09/17/25	WRW	[REDACTED]	0.60	231.00
09/17/25	WRW	Draft opposition to Plaintiff's motion in limine to exclude video presentations.	1.40	539.00
09/17/25	EH	[REDACTED]	3.80	570.00
09/17/25	EH	[REDACTED]	1.40	210.00
09/17/25	JD	Trial preparations.	8.00	1,200.00
09/18/25	JFR	[REDACTED]	2.90	1,363.00
09/18/25	JFR	Pre-Trial Hearing.	3.80	1,786.00
09/18/25	WRW	Attend pretrial conference.	3.50	1,347.50
09/18/25	WRW	Meet and confer with courtroom technology officer	0.20	77.00

Date	Initials	Description	Hours	Amount
		to setup media presentation for hearing.		
09/18/25	EH	Pull copies of missing Plaintiff's missing trial exhibits from discovery productions.	1.80	270.00
09/18/25	EH	[REDACTED]	2.30	345.00
09/18/25	KK	[REDACTED]	0.80	120.00
09/19/25	JFR	[REDACTED]	2.70	1,269.00
09/19/25	WRW	Begin drafting court ordered opposition to Plaintiff's latest motion to compel.	2.30	885.50
09/21/25	JFR	[REDACTED]	4.80	2,256.00
09/22/25	JFR	Follow-up on outstanding legal issues in case.	12.80	6,016.00
09/22/25	WRW	Draft response to Plaintiff's supplement in support of motion to compel.	4.10	1,578.50
09/22/25	WRW	[REDACTED]	1.30	500.50
09/22/25	WRW	Continue drafting court required opposition to Plaintiff's motion to compel.	3.10	1,193.50
09/23/25	JFR	[REDACTED].	2.90	1,363.00
09/23/25	JFR	Revisions to Response to Supplemental Filing.	3.80	1,786.00
09/23/25	WRW	[REDACTED]	2.20	847.00
09/23/25	WRW	Continue drafting response to plaintiff's supplement in support of motions to compel.	6.60	2,541.00
09/23/25	EH	Draft Requests for Admissions, using testimony from Plaintiff's depositions that occurred on March 27 and June 17, 2025, for purposes of summary judgment.	4.20	630.00
09/24/25	JFR	[REDACTED]	2.80	1,316.00
09/24/25	JFR	Hearing on Motions to Compel.	6.40	3,008.00
09/24/25	WRW	[REDACTED]	1.10	423.50
09/24/25	WRW	Attend hearing on motions to compel.	5.80	2,233.00
09/24/25	EH	[REDACTED]	1.20	180.00

Date	Initials	Description	Hours	Amount
09/25/25	JFR	[REDACTED]	1.90	893.00
09/26/25	JFR	Response to Discovery.	1.30	611.00
09/29/25	JFR	Follow-up with Court on outstanding issues.	0.30	141.00
09/30/25	SB	[REDACTED]	0.80	308.00
09/30/25	SB	[REDACTED]	0.50	192.50
09/30/25	SB	[REDACTED]	1.20	462.00
09/30/25	SB	[REDACTED]	0.50	192.50
09/30/25	SB	[REDACTED]	2.60	1,001.00
09/30/25	SB	[REDACTED]	0.40	154.00
09/30/25	SB	[REDACTED]	0.80	308.00
Total Services:			399.20	135,926.00

**Timekeeper Summary**

Timekeeper	Initials	Title	Rate	Hours	Amount
Jimmy F. Robinson, Jr.	JFR	Shareholder	470.00	150.40	70,688.00
Sebastian L. Brana	SB	Associate	385.00	6.80	2,618.00
William R. Waddell	WRW	Associate	385.00	112.00	43,120.00

<b>Timekeeper</b>	<b>Initials</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Jessica E. Denver	JD	Paralegal	150.00	58.00	8,700.00
Evelyn Henschel	EH	Paralegal	150.00	68.60	10,290.00
Jonathon Metcalfe	JM	Litigation Support	150.00	1.10	165.00
		Case Manager			
Karen Kowing	KK	Other	150.00	2.30	345.00

### Expenses

<b>Description</b>	<b>Amount</b>
Express Delivery/Postage	1.00 @ 16.92 ea. 16.92
Computer Research-Lexis	6.00 @ 99.00 ea. 594.00
Computer Research-Westlaw	5.00 @ 754.79 ea. 3,773.96
VENDOR: Planet Depos LLC INVOICE#: 782645 DATE: 9/2/2025	2,000.70
Planet Depos LLC - Court reporter for hearing on 8/25/2025 in the Clay matter. - on 08/25/25	
VENDOR: Halasz Reporting & Video Court Reporters INVOICE#: 255880 DATE: 9/4/2025	381.00
Halasz Reporting & Video Court Reporters - Deposition transcripts in the Clay v City of Richmond matter. - on 08/20/25 - Gerald Westry	
VENDOR: Planet Depos LLC INVOICE#: 780106 DATE: 9/4/2025	1,137.21
Planet Depos LLC - Transcripts for hearing in the Clay matter. - on 07/30/25 - Hearing	
Vendor: Jessica E. Denver Invoice#: 7681968109171908 Date: 9/17/2025 - CREXP 9.17.2025 Expense Reimbursement Request - Jessica E. Denver - Parking - Parking fee incurred outside the Richmond City Circuit Court for the purpose of filing the Defendant's Exhibit and Witness List for the trial. on 09/08/25	2.95
Vendor: Jessica E. Denver Invoice#: 7681968109171908 Date: 9/17/2025 - CREXP 9.17.2025 Expense Reimbursement Request - Jessica E. Denver - Parking - Parking fee incurred outside the Richmond City Circuit Court to file the Defendant's Motion in Limine for the upcoming trial. on 09/09/25	2.95
VENDOR: Halasz Reporting & Video Court Reporters INVOICE#: 255969 DATE: 9/9/2025	423.00
Halasz Reporting & Video Court Reporters - Transcripts of the deposition in the Clay v City of Richmond matter. - on 09/05/25 - Timeko Hunte-Brown	
Vendor: U. S. Bank Invoice#: 7691039009252104 Date: 9/25/2025 - CREXP CC Reconciliation Report 9.22.2025 Jacquemin Catherine A. - Catherine A. Jacquemin - Color Copies - Master Jury List for Clay v City of Richmond trial. ((N-A))	15.30
Vendor: Jessica E. Denver Invoice#: 7681968109171908 Date: 9/17/2025 - CREXP 9.17.2025 Expense Reimbursement Request - Jessica E. Denver - Parking - Parking fee incurred outside the Richmond City Circuit Court to obtain copies of the Master Jury List. on 09/16/25	2.95
Vendor: Halasz Reporting & Video Court Reporters Invoice#: 256121 Date: 9/16/2025 - CRINV 256121	150.00
Vendor: Halasz Reporting & Video Court Reporters Invoice#: 256113 Date: 9/16/2025 - CRINV 256113	552.20

Description	Amount
Vendor: Jessica E. Denver Invoice#: 7701927809291511 Date: 9/29/2025 - CREXP 9.23.2025 Expense Reimbursement Request - Jessica E. Denver - Parking - Parking at the Richmond City Circuit Court to submit two motions in the Clay v City of Richmond matter. on 09/17/25	2.95
Vendor: William R. Waddell Invoice#: 7702016509302206 Date: 9/30/2025 - CREXP 9.26.2025 Expense Reimbursement Request - William R. Waddell - Parking - Parking while attending the Clay v. City of Richmond hearing on September 18, 2025. on 09/18/25	22.00
Vendor: Halasz Reporting & Video Court Reporters Invoice#: 256200 Date: 9/19/2025 - CRINV 256200	506.50
Vendor: Jessica E. Denver Invoice#: 7701927809291511 Date: 9/29/2025 - CREXP 9.23.2025 Expense Reimbursement Request - Jessica E. Denver - Parking - Parking at the Richmond City Circuit Court to submit the Defendant's response to the Plaintiff's Supplement in Support of Motions to Compel in the Clay v City of Richmond matter. on 09/23/25	2.95
VENDOR: Planet Depos LLC INVOICE#: 789941 DATE: 9/25/2025 Planet Depos LLC - Transcripts for hearing in the Clay matter. - on 09/18/25 - Hearing	1,953.69
Electronic Discovery Management Services provided by Managed Services Vendor. Processing, Hosting, Review, or Production of Client's electronic records for September 2025.	1,046.39
Total Expenses	12,587.62
TOTAL FEES	\$135,926.00
TOTAL EXPENSES	\$12,587.62
TOTAL THIS BILL	\$148,513.62



# Ogletree Deakins

Value  
Innovation  
Quality  
Collaboration  
Communication

## CLIENT PLEDGE

In addition to using paper checks, were you aware we can accept your remittances via three other payment methods? We encourage you to select the most convenient option, even if it's different from what you normally use. If you have a question about any of these payment methods or amounts owed, please send your inquiry to [acctsrec@odnss.com](mailto:acctsrec@odnss.com). We promise you will receive a prompt response. Thank you!

### 1. ACH Payment Instructions

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

ACH – use CTX file Format & include invoice numbers

Email remittance to [paymentremittance@ogletree.com](mailto:paymentremittance@ogletree.com)

### 2. Wire Instructions (Within the USA)

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

### Wire Instructions (Outside the USA)

ABA # [REDACTED]

Account # [REDACTED]

Swift Code # NRTHUS33XXX

Credit to: Ogletree Deakins Nash Smoak & Stewart

Would you like to receive our bills by email? Send your request to [Billing2@ogletreedekins.com](mailto:Billing2@ogletreedekins.com)





Submit Via E-Mail Only –  
Do Not Send Hard Copy

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

*Attorneys at Law*

Administrative Office  
50 International Drive  
Patewood IV, Suite 300  
Greenville, SC 29615  
Telephone: (864) 241-1801

December 30, 2025

Laura Drewry, Esq.  
City Attorney  
City of Richmond, VA  
900 East Broad Street, Suite 400  
Richmond, VA 23219  
laura.drewry@richmondgov.com

PERSONAL AND CONFIDENTIAL

Bill No. 91832409  
Client.Matter # 029115.000016

**Re: Clay v. City of Richmond, et al.  
PO No. 25000011214**

Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Fees .....	\$80,494.00
Expenses.....	\$15,498.24
<b>Total Due This Bill.....</b>	<b>\$95,992.24</b>

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #: [REDACTED]	TD Bank	ABA #: [REDACTED]	PO Box 89
300 Delaware Ave	Account #: [REDACTED]	102 South Main St	Account #: [REDACTED]	Columbia, SC 29202
Wilmington, Delaware 19801	Swift Code: NRTHUS33XXX	Greenville, SC 29601		

For Wire Payments, Credit To: Ogletree Deakins Nash Smoak & Stewart and include bill number(s).  
For ACH Payments, Credit To: Ogletree Deakins and include bill numbers(s).  
For Check Payments, make payable to Ogletree Deakins and include bill number(s).  
Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

**Payable upon 30 days.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.

Laura Drewry, Esq.  
City Attorney  
City of Richmond, VA  
900 East Broad Street, Suite 400  
Richmond, VA 23219  
laura.drewry@richmondgov.com

**Re: Clay v. City of Richmond, et al.**  
**PO No. 25000011214**

Detailed Invoice  
Confidential and Privileged Information  
Subject to Section 2.2-3705.1 (3) of the Code of Virginia  
Exemption under Virginia Freedom of Information ACT (FOIA)

Date	Initials	Description	Hours	Amount
10/01/25	JFR	Strategy meeting.	0.90	423.00
10/01/25	SB	[REDACTED]	2.90	1,116.50
10/01/25	SB	[REDACTED]	0.70	269.50
10/01/25	SB	[REDACTED]	0.40	154.00
10/01/25	SB	[REDACTED]	1.30	500.50
10/02/25	JFR	Drafting of RFAs.	2.90	1,363.00
10/02/25	JFR	[REDACTED]	1.20	564.00
10/02/25	JFR	[REDACTED]	0.80	376.00
10/03/25	JFR	Case work-up and follow-up.	2.70	1,269.00
10/06/25	JFR	Follow-up with discovery issues.	3.90	1,833.00
10/08/25	EH	[REDACTED]	3.20	480.00
10/09/25	JFR	Follow-up with Court regarding mediation,	3.80	1,786.00

Date	Initials	Description	Hours	Amount
		depositions and discovery issues.		
10/10/25	JFR	Case strategy and work-up.	5.80	2,726.00
10/10/25	EH	[REDACTED]	2.40	360.00
10/13/25	WRW	Begin drafting objections and responses to Plaintiff's requests for admission.	1.30	500.50
10/13/25	WRW	[REDACTED]	0.60	231.00
10/13/25	WRW	Revise, edit, and continue drafting Defendants' First Set of Requests for Admission to Plaintiff.	0.80	308.00
10/14/25	JFR	Case Work-Up.	10.50	4,935.00
10/14/25	WRW	[REDACTED]	0.40	154.00
10/15/25	WRW	Begin drafting motion to compel discovery responses from Plaintiff and documents requested from Plaintiff's damages expert, Robert W. Cook.	2.20	847.00
10/15/25	WRW	Begin drafting motion for costs associated with expert motions.	1.10	423.50
10/15/25	WRW	Conference call with court.	0.30	115.50
10/15/25	WRW	[REDACTED]	0.50	192.50
10/15/25	WRW	Begin drafting court-ordered discovery declaration and supplemental discovery responses to select few supplemental requests for production propounded by Plaintiff.	1.30	500.50
10/15/25	WRW	[REDACTED]	0.50	192.50
10/15/25	WRW	[REDACTED]	0.40	154.00
10/16/25	WRW	[REDACTED]	1.10	423.50
10/17/25	WRW	Communications with court regarding mediation.	0.30	115.50
10/17/25	WRW	Communicate with opposing counsel regarding discovery and mediation.	0.40	154.00
10/17/25	EH	[REDACTED]	0.30	45.00
10/17/25	EH	[REDACTED]	1.20	180.00

Date	Initials	Description	Hours	Amount
		[REDACTED]		
10/17/25	EH	Draft out-of-state subpoena and include original Virginia subpoena for purposes of serving Plaintiff's expert, Robert W. Cook with a deposition subpoena and request to produce documents.	0.60	90.00
10/20/25	JFR	[REDACTED]	3.90	1,833.00
10/21/25	WRW	[REDACTED]	0.40	154.00
10/21/25	EH	Draft a new subpoena that complies with the rules of North Carolina and under the Uniform Interstate Deposition and Discovery Act, including the terms of the foreign subpoena, [REDACTED]	1.40	210.00
10/21/25	EH	[REDACTED]	0.60	90.00
10/22/25	WRW	[REDACTED]	1.50	577.50
10/22/25	WRW	[REDACTED]	0.80	308.00
10/24/25	JFR	[REDACTED]	3.90	1,833.00
10/24/25	WRW	Continue drafting court-ordered discovery declaration.	0.60	231.00
10/24/25	WRW	Continue drafting Motion to Compel and motion in support of attorney fees for expert motion in limine.	1.40	539.00
10/27/25	JFR	[REDACTED]	3.90	1,833.00
10/27/25	WRW	Revise, edit, and finalize responses to plaintiff's requests for admission.	0.50	192.50
10/28/25	JFR	[REDACTED]	1.80	846.00
10/28/25	EH	[REDACTED]	0.80	120.00
10/29/25	JFR	Finalization of Declarations [REDACTED]	4.90	2,303.00
10/29/25	WRW	Supplement written responses to second set of RFPs covered during 9/24 hearing.	0.70	269.50
10/29/25	WRW	Communications with court and opposing counsel	0.20	77.00

Date	Initials	Description	Hours	Amount
		regarding discovery supplements.		
10/29/25	WRW	Communications with plaintiff's counsel regarding supplemental discovery responses and Relativity emails.	0.60	231.00
10/29/25	WRW	[REDACTED]	0.70	269.50
10/29/25	WRW	[REDACTED]	0.20	77.00
10/29/25	WRW	Revise and edit discovery responses.	0.90	346.50
10/29/25	WRW	[REDACTED]	0.40	154.00
10/29/25	WRW	Continue drafting, revise, edit, and finalize court-ordered discovery declaration.	3.10	1,193.50
10/29/25	EH	[REDACTED]	2.40	360.00
10/29/25	EH	Edit and add Defendants' answers to its Second Supplemental production, based on the September 24, 2025 hearing.	2.80	420.00
10/29/25	EH	[REDACTED]	0.30	45.00
10/30/25	JFR	Draft Communication to Judge Cardwell regarding confidential communications associated with Petula Burks separation.	3.80	1,786.00
10/30/25	EH	Draft verification page for Defendants' responses to Plaintiff's First Set of Discovery Requests.	0.30	45.00
10/30/25	JD	Create pdf of documents for Judge review.	1.00	150.00
11/05/25	WRW	[REDACTED]	0.20	77.00
11/06/25	JFR	Case work up.	9.60	4,512.00
11/06/25	WRW	[REDACTED]	0.80	308.00
11/06/25	WRW	[REDACTED]	0.40	154.00
11/10/25	JFR	Case management and workup.	4.80	2,256.00
11/11/25	WRW	[REDACTED]	0.30	115.50
11/12/25	JFR	[REDACTED]	1.80	846.00

Date	Initials	Description	Hours	Amount
11/12/25	JFR	Responses to Various Motions.	4.90	2,303.00
11/12/25	JFR	[REDACTED].	2.90	1,363.00
11/12/25	WRW	[REDACTED]	0.30	115.50
11/13/25	SAS	Communicate with Court staff regarding hearing on Plaintiff's motion to reschedule Burks deposition and address strategy in connection with the same.	0.30	141.00
11/13/25	WRW	[REDACTED]	0.40	154.00
11/13/25	WRW	[REDACTED]	0.70	269.50
11/13/25	WRW	[REDACTED]	0.80	308.00
11/13/25	WRW	Communicate with court regarding Plaintiff's motion to unseal documents.	0.30	115.50
11/14/25	WRW	[REDACTED]	0.20	77.00
11/16/25	JFR	[REDACTED]	3.80	1,786.00
11/17/25	JFR	[REDACTED].	2.90	1,363.00
11/17/25	JFR	[REDACTED]	4.30	2,021.00
11/17/25	WRW	[REDACTED]	1.30	500.50
11/18/25	JFR	[REDACTED]	3.80	1,786.00
11/18/25	JFR	Hearing with Judge Cardwell.	1.40	658.00
11/18/25	WRW	Appear for hearing.	0.60	231.00
11/18/25	WRW	Finalize third-party subpoenas.	0.40	154.00
11/18/25	EH	Edit and finalize subpoena Duces Tecum for Plaintiff's expert, Robert Cook and arrange for filing with the North Carolina Superior Court.	0.60	90.00
11/19/25	JFR	[REDACTED].	3.90	1,833.00
11/19/25	TD	Revise documentation for submission to NC Superior Court of Hertford County.	0.40	154.00
11/19/25	TD	Domesticate foreign subpoena with Hertford County Superior Court.	0.30	115.50
11/19/25	EH	[REDACTED]	1.40	210.00
11/19/25	EH	Edit Subpoena Duces Tecum to Plaintiff's expert, Robert Cook, to identify location to send records, in lieu of deposition testimony.	0.30	45.00
11/20/25	WRW	Begin drafting opposition to plaintiff's motion for	4.20	1,617.00

Date	Initials	Description	Hours	Amount
		spoliation and motion to continue deposition of Petula Burks.		
11/20/25	EH	Draft cover letter to Plaintiff's expert, Robert Cook, regarding accepting service of subpoena Duces Tecum.	0.20	30.00
11/21/25	JFR	[REDACTED]	9.80	4,606.00
11/21/25	SAS	[REDACTED]	0.40	188.00
11/21/25	WRW	Revise and edit amended scheduling orders proposed by opposing counsel.	0.40	154.00
11/21/25	WRW	Revise and edit notice regarding plaintiff's failure to appear for court-ordered deposition.	0.60	231.00
11/21/25	WRW	Communicate with opposing counsel regarding proposed amended scheduling orders.	0.30	115.50
11/21/25	WRW	Begin drafting fee petition and motion in support of fees as directed by court relating to motion to exclude Plaintiff's expert designation.	2.10	808.50
11/24/25	JFR	Prep of Motion for Connie Clay matter.	9.80	4,606.00
11/24/25	WRW	Communicate with opposing counsel regarding amended scheduling orders required by the court.	0.40	154.00
11/24/25	WRW	Continue drafting opposition to spoliation motion, response to Plaintiff's motion to continue Petula Burks deposition, and motion in support of attorney fees relating to disqualification of Plaintiff's economist.	4.70	1,809.50
11/24/25	JD	[REDACTED]	4.00	600.00
11/25/25	JD	[REDACTED]	3.00	450.00
11/26/25	JFR	Case work-up.	3.80	1,786.00
Total Services:			198.30	80,494.00

#### Timekeeper Summary

Timekeeper	Initials	Title	Rate	Hours	Amount
Jimmy F. Robinson, Jr.	JFR	Shareholder	470.00	122.20	57,434.00
Scott A. Siegner	SAS	Shareholder	470.00	0.70	329.00
Tatiana M. Terry	TD	Associate	385.00	0.70	269.50
Sebastian L. Brana	SB	Associate	385.00	5.30	2,040.50
William R. Waddell	WRW	Associate	385.00	42.60	16,401.00
Jessica E. Denver	JD	Paralegal	150.00	8.00	1,200.00
Evelyn Henschel	EH	Paralegal	150.00	18.80	2,820.00

### Expenses

Description	Amount
Computer Research-Lexis 66.00 @ 68.50 ea.	4,520.88
Computer Research-Westlaw 3.00 @ 896.00 ea.	2,688.00
VENDOR: Halasz Reporting & Video Court Reporters INVOICE#: 256188 DATE: 9/19/2025	1,217.25
Halasz Reporting & Video Court Reporters - Videographer for the deposition of Petula Burks in the Clay matter. - on 09/09/25	
VENDOR: Planet Depos LLC INVOICE#: 792056 DATE: 10/3/2025	3,856.45
Planet Depos LLC - Court reporter for hearing in the Clay matter. - on 09/24/25	
Electronic Discovery Management Services provided by Managed Services Vendor. Processing, Hosting, Review, or Production of Client's electronic records for October 2025.	1,035.89
VENDOR: Sandy D. Gills INVOICE#: 7818736911192106 DATE: 11/19/2025	12.00
Sandy D. Gills - Parking - Fee for parking during a hearing regarding the Clay matter. on 11/18/25	
VENDOR: U. S. Bank INVOICE#: 7839179412041803 DATE: 12/4/2025	5.78
Beth A. Wirtz - Filing Fees - Filing fee for subpoena on 11/19/25	
VENDOR: U. S. Bank INVOICE#: 7839179412041803 DATE: 12/4/2025	200.00
Beth A. Wirtz - Filing Fees - Filing fee for subpoena on 11/19/25	
VENDOR: Planet Depos LLC INVOICE#: 806228 DATE: 11/26/2025	926.10
Planet Depos LLC - Court attendance and transcript for hearing in the Clay matter. - on 11/18/25 - Hearing	
Electronic Discovery Management Services provided by Managed Services Vendor. Processing, Hosting, Review, or Production of Client's electronic records for November 2025.	1,035.89
Total Expenses	15,498.24

TOTAL FEES	\$80,494.00
TOTAL EXPENSES	\$15,498.24
TOTAL THIS BILL	\$95,992.24





In addition to using paper checks, were you aware we can accept your remittances via three other payment methods? We encourage you to select the most convenient option, even if it's different from what you normally use. If you have a question about any of these payment methods or amounts owed, please send your inquiry to [acctsrec@odnss.com](mailto:acctsrec@odnss.com). We promise you will receive a prompt response. Thank you!

### **1. ACH Payment Instructions**

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

ACH – use CTX file Format & include invoice numbers

Email remittance to [paymentremittance@ogletree.com](mailto:paymentremittance@ogletree.com)

### **2. Wire Instructions (Within the USA)**

ABA # [REDACTED]

Account # [REDACTED]

Credit to: Ogletree Deakins Nash Smoak & Stewart

### **Wire Instructions (Outside the USA)**

ABA # [REDACTED]

Account # [REDACTED]

Swift Code # NRTHUS33XXX

Credit to: Ogletree Deakins Nash Smoak & Stewart

Would you like to receive our bills by email? Send your request to [Billing2@ogletreedekins.com](mailto:Billing2@ogletreedekins.com)

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