

City of Shreveport
Ms. Terri Scott
City Attorney's Office
505 Travis Street, Suite 420
Shreveport LA 71101

Attn: Ms. Terri Scott

Petition for Mandamus
Plaintiff: Cynthia Keith
Shreveport Dog Park Alliance

			Hours
03/30/2013	RFL	Reading letter from Ms. Scott re: potential lawsuit; Receipt and review of Petition for Writ of Mandamus; Receipt and review of Petitioner's First Interrogatories; Receipt and review of Resolution No. 133	2.30
03/31/2013	CRJ	Legal research re: mandamus	1.20
04/01/2013	CRJ	Review of file and preparation for conference with Ms. Scott; Legal research re: discretionary acts versus ministerial acts, standing; Review of Shreveport City Charter	2.80
	RFL	Legal research re: ministerial duties as defined by law; Review of City Charter	2.70
04/02/2013	CRJ	Conference with Ms. Scott re: defenses, litigation strategy	0.80
	RFL	Telecon with Mr. Keele re: status, service; Legal research re: ministerial duties, analogous cases; Conference with Ms. Scott re: status, strategy; Preparation of draft Exception of No Cause of Action and Memorandum in Support	5.80
04/03/2013	RFL	Telecon with Mr. Keele re: status of hearing, defenses; Telecon with Ms. Scott re: status	0.40
04/04/2013	RFL	Telecon with Mr. Keele; Reading letter from Mr. Keele re: motion to reset; Receipt and review of Joint Motion and Order to Reset Hearing; Conference with Mr. Keele and Judge Emanuel's secretary re: resetting of hearing	0.80
04/05/2013	RFL	Telecon with Ms. Scott re: status, continuance; Receipt and review of certified copy of Resolution 133 of 2012	1.30
04/06/2013	RFL	Reading letter from Ms. Scott re: Resolution 133; Receipt and review of Resolution 133 and attachments; Reading letter from Ms. Scott re: new file assignment; Review of attachments	0.90

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	RFL Letter to Ms. Scott re: file acknowledgment	0.20
04/12/2013	RFL Review of file and preparation of draft Answer to Petition; Review of and revise Exception of No Cause of Action; Preparation of draft discovery to plaintiff	3.30
	RFL Review of file and preparation of draft Exception of No Right of Action, Exception of Lack of Standing; Legal research re: ministerial duties, separation of powers issue	1.90
04/16/2013	SDH Legal research re: separation of powers, whether mayor can be forced to sign a contract	1.80
	RFL Legal research re: legislative powers of City Council (under City Charter); administrative and executive powers of the mayor; veto power; government and separation of powers	3.30
04/17/2013	RFL Legal research re: ministerial duty, potential pleadings; Preparation of draft Exception of No Cause of Action as it relates to Mayor Cedric Glover in his official capacity, and Memorandum in Support	3.90
	RFL Review of and revise Exception of No Cause of Action and Memorandum in Support as it regards Cedric Glover in his official capacity; Review of and revise Exception of No Cause of Action and Memorandum in Support as it regards Cedric Glover individually; Legal research re: individual claims	2.30
04/18/2013	RFL Review of file re: work on discovery responses; Revise Exception	1.60
	RFL Review of Cooperative Endeavor Agreements	0.60
	RFL Finalize Exception and Memorandum in Support on behalf of Cedric Glover as Mayor of Shreveport; Finalize Exception and Memorandum in Support on behalf of Cedric Glover, individually; Letter to Ms. Scott re: copy of exceptions; Letter to clerk to file Exceptions	2.60
04/19/2013	RFL Review of and revise responsive pleadings; Revise discovery responses; Legal research re: additional cases where mandamus was issued, potential exception of no right of action	2.30
04/20/2013	RFL Review of and revise Answer; Revise responses to Interrogatories propounded by plaintiffs; Revise discovery propounded to plaintiffs	2.40
04/23/2013	CRJ Review of file and preparation of draft Answer to Petition; Preparation of draft responses to discovery propounded by plaintiff; Letter to Mr. Keele re: discovery; Letter to Judge Emanuel re: hearing; Letter to Mr. Keele re: hearing	2.40

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	CRJ	Preparation of litigation strategy opinion	0.60	
	RFL	Telecon with Ms. Scott re: file status, strategy; Letter to Mr. Keele re: request for status conference, logistics of trial; Letter to Judge Emanuel re: request for status conference, logistics of trial; Preparation of draft Motion to Quash Subpoena	2.30	
04/24/2013	RFL	Review of file and work on Motion to Quash; Preparation of draft responses to discovery	1.30	
04/26/2013	RFL	Review of and revise Answer; Revise First Supplemental Interrogatories and Request for Production to plaintiff	0.80	
	RFL	Review of and revise discovery	0.30	
04/27/2013	RFL	Review of file re: status of setting of hearing on Exception; Work on examination questions of witnesses; Trial preparation re: work on Trial Notebook	1.90	
04/28/2013	RFL	Review of subpoena requests; Review of certified information relative to Resolution; Review of recent report/interview of Councilman Corbin regarding separation of powers	1.60	
04/29/2013	RFL	Review of subpoena request; Work on potential trial stipulations; Outline potential questions from plaintiff	2.60	
	RFL	Receipt and review of Rule to Show Cause setting hearing on Exception filed on behalf of Cedric Glover, individually	0.30	
04/30/2013	CRJ	Review of and revise Motion to Quash and Memorandum in Support	1.30	
	CRJ	Trial preparation re: legal research regarding mandamus; revise direct and cross examinations for Mayor Glover, Art Thompson, Shelly Ragle and Woodrow Wilson, respectively	3.00	
		For Current Services Rendered	63.60	7,314.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Ronald F. Lattier	Partner	49.70	\$115.00	\$5,715.50
Senae D. Hall	Associate	1.80	115.00	207.00
Curtis R. Joseph, Jr.	Associate	12.10	115.00	1,391.50

Expenses

04/18/2013	Filing Fees: Exception of No Cause (obo Glover individually)	150.00
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City of Shreveport

May 01, 2013

CLIENT/MATTER 340-0072M

Statement No: 18579

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Total Expenses	<u>150.00</u>
Total Current Work	7,464.00
Balance Due	<u>\$7,464.00</u>