

FILED

JUN - 5 2014

SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF SPOKANE

STATE OF WASHINGTON,

Plaintiff,

vs.

GAIL H. GERLACH,

Defendant.

No. 13-1-01907-9

PA# 13-9-48758-0

COVERSHEET FOR BILLING AND COSTS

COVERSHEET FOR BILLING AND COSTS

Richard Lee
Attorney at Law
P.O. Box 7550
Spokane, WA 99207
(509) 536-0986

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COLUMBIA INTERNATIONAL FORENSICS LABORATORY

202 Casey Court, Newport, WA 99156-9363
PH: (509) 447-2067 / FX: (509) 447-4184
GAYLAD WARREN * FORENSIC MICROSCOPIST
4n6@povn.com www.povn.com/4n6/

Invoice number - b3.0709 Invoice date - 31 July 2013

Requesting Agent: Richard Lee
Attorney at Law
P. O. Box 7550
Spokane, WA 99207
509-536-0986
Reference: Re: Gerlach, Gail H.

Table with columns: DATE, Hr:Min, \$/hr., DESCRIPTION, \$total. Rows include dates from 06/20/13 to 07/17/13 with descriptions like 'Examination / Consultation', 'Travel time', and 'mileage'. Total Due: \$2875.00.

Payable upon receipt

ALL CHARGES ARE DUE AND PAYABLE WITHIN 30 DAYS UNLESS OTHER ARRANGEMENTS HAVE BEEN MADE.

Thank You!

Please make check payable to: COLUMBIA INT. FORENSICS LAB.

Remit to:

COLUMBIA INT'L FORENSICS LAB
202 Casey Court
Newport, Wa. 99156-9363
(509) 447-2067

COLUMBIA INTERNATIONAL FORENSICS LABORATORY

202 Casey Court, Newport, WA 99156-9363
 Ph. (509) 447-2067 / Fax. (509) 447-4184
 Gaylan WARREN * FORENSIC MICROSCOPIST
 gaw@pcvn.com www.pcvn.com/4n67

=====
 Invoice number - **b3.0709a** Invoice date - 31 August 2013
 =====

Requesting Agent: Reference:
 Richard F. Lee Re: Gerlach, Gail H.
 Attorney at Law 13-1-01907-9
 P. O. Box 7550
 Spokane, WA 99207
 509-536-0986

DATE	Hr:Mn	\$\$/hr.	DESCRIPTION	\$total
08/13/13	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	2:00	250.	Examination / Consultation:	\$ 500.00
"			Expenses:	\$ NA.
08/22/13	:30	250.	Examination / Consultation:	\$ 125.00
08/23/13	:30	250.	Examination / Consultation:	\$ 125.00
08/29/13	1:00	250.	Examination / Consultation:	\$ 250.00
08/30/13	6:00	250.	Examination / Consultation:	\$1500.00
/ /	:00	250.	Examination / Consultation:	\$
/ /	:	250.	Examination / Consultation:	\$
"	1	1100.	Expert witness fee: 1st Hour 1st Day	\$
"		125.	after first hour: 1st Day	\$
"		250.	Court subsequent days:	\$
"			Expenses:	\$

Total Due: \$2792.12

Payable upon receipt
 ALL CHARGES ARE DUE AND PAYABLE WITHIN 30 DAYS
 UNLESS OTHER ARRANGEMENTS HAVE BEEN MADE.

Thank You!

=====
 Please make check payable to: COLUMBIA INT. FORENSICS LAB.
 Remit to:
 COLUMBIA INT'L FORENSICS LAB
 202 Casey Court
 Newport, Wa. 99156-9363
 (509) 447-2067

COLUMBIA INTERNATIONAL FORENSICS LABORATORY

202 Casey Court, Newport, WA 99156-9363
 PH. (509) 447-2067 / FAX. (509) 447-4184
 GAYL AN WARREN * FORENSIC MICROSCOPIST
 gaw@pcyn.com - www.pcyn.com/4467

=====

Invoice number - b3.0709c Invoice date - 30 October 2013

Requesting Agent: Reference:

Richard F. Lee Re: Gerlach, Gail H.
 Attorney at Law 13-1-01907-9
 P. O. Box 7550
 Spokane, WA 99207
 509-536-0986

DATE	Hr:Mn	\$\$/hr.	DESCRIPTION	\$total
10/01/13	2:00	125.	Travel time:	\$ NA.
"	mileage:		.54 X 78 Miles:	\$
"	:30	250.	Examination / Consultation:	\$ 125.00
"	<u>Expenses:</u>			\$ NA.
10/02/13	2:00	125.	Travel time:	\$ 250.00
"	mileage:		.54 X 78 Miles:	\$ 42.12
"	3:00	250.	Examination / Consultation:	\$ 750.00
"	<u>Expenses:</u>			\$ NA.
10/25/13	2:00	125.	Travel time:	\$ 250.00
"	mileage:		.54 X 78 Miles:	\$ 42.12
"	3:30	250.	Examination / Consultation:	\$ 875.00
"	<u>Expenses:</u>			\$ NA.
/ /	:00	250.	Examination / Consultation:	\$
/ /	:00	250.	Examination / Consultation:	\$
/ /	:	250.	Examination / Consultation:	\$
"	1	1100.	Expert witness fee: 1st Hour 1st Day	\$
"		125.	after first hour: 1st. Day	\$
"	:	250.	Court subsequent days:	\$
"	<u>Expenses:</u>			\$

Total Due: \$2334.24.

Payable upon receipt

ALL CHARGES ARE DUE AND PAYABLE WITHIN 30 DAYS
 UNLESS OTHER ARRANGEMENTS HAVE BEEN MADE.

Thank You!

Please make check payable to: COLUMBIA INT. FORENSICS LAB.

Remit to:

COLUMBIA INT'L FORENSICS LAB
 202 Casey Court
 Newport, Wa. 99156-9363
 (509) 447-2067

COLUMBIA INT'L FORENSICS LAB

GAYLAN WARREN - FORENSIC MICROSCOPIST
202 Casey Court, Newport, Washington 99156-9363
406@povn.com - www.povn.com/406
(509) 447-2067 PH. (509) 447-4184 FX.

Statement of Account

Requesting Agent:

Reference:

Richard F. Lee
Attorney at Law
P. O. Box 7550
Spokane, WA 99207
509-536-0986

Re: Gerlach, Gail H.
13-1-01907-9

30 May 2014

Date	Invoice	\$ Balance
07/31/13	b3.0709	\$ 2875.00
08/31/13	b3.0709a	\$ 2792.12
09/30/13	b3.0709b	\$ 250.00
10/30/13	b3.0709c	\$ 2334.24
01/31/14	b3.0709d	\$ 542.12
03/31/14	b3.0709e	\$ 2709.24
04/10/14	b3.0709f	\$11144.84

Total Due: \$22647.56

ALL CHARGES ARE DUE AND PAYABLE WITHIN 30 DAYS
UNLESS OTHER ARRANGEMENTS HAVE BEEN MADE.

Thank You!

Gaylan Warren - dba = COLUMBIA INT'L. FORENSICS LAB.

COLUMBIA INTERNATIONAL FORENSICS LABORATORY

202 Casey Court, Newport, WA 99156-9363
PH: (509) 447-2067 / FX: (509) 447-4184
CAYLOR WARREN * FORENSIC MICROSCOPIST
406@povt.com . www.povt.com/4067

=====
Invoice number - b3.0709d Invoice date - 31 January 2014
=====

Requesting Agent: Reference:
Richard F. Lee Re: Gerlach, Gail H.
Attorney at Law 13-1-01907-9
P. O. Box 7550
Spokane, WA 99207
509-536-0986

DATE	Hr:Mn	\$\$/hr.	DESCRIPTION	\$total
01/22/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	1:00	250.	Examination / Consultation:	\$ 250.00
"			Expenses:	\$ NA.
/ /	:00	250.	Examination / Consultation:	\$.
/ /	:00	250.	Examination / Consultation:	\$.
/ /	:	250.	Examination / Consultation:	\$.
"	1	1100.	Expert witness fee: 1st hour 1st day	\$.
"		125.	after first hour: 1st day	\$.
"		250.	Court subsequent days:	\$.
"			Expenses:	\$.

Total Due: \$ 524.12.

Payable upon receipt

ALL SERVICES ARE PAID UPON RECEIPT WITHIN 30 DAYS
UNLESS OTHERWISE INDICATED OR AGREED UPON.

Thank You!

Please make check payable to: COLUMBIA INT. FORENSICS LAB.

Remit to:

COLUMBIA INT'L FORENSICS LAB
202 Casey Court
Newport, Wa. 99156-9363
(509) 447-2067

COLUMBIA INTERNATIONAL FORENSICS LABORATORY

202 Casey Court, Newport, WA 99156-9363
PH. (509) 447-2067 / FX. (509) 447-4184
Gaylan Warren * FORENSIC MICROSCOPIST
info@covn.com www.covn.com/1067

Invoice number - b3.0709e Invoice date - 31 March 2014

Requesting Agent:

Reference:

Richard F. Lee
Attorney at Law
P. O. Box 7550
Spokane, WA 99207
509-536-0986

Re: Gerlach, Gail H.
13-1-01907-9

Table with columns: DATE, Hr:Mn, \$\$/hr., DESCRIPTION, \$total. Rows include travel time, mileage, and examination/consultation services for various dates in March 2014.

Total Due: \$2709.24

Payable upon receipt

ALL CHARGES ARE DUE AND PAYABLE WITHIN 30 DAYS UNLESS OTHER ARRANGEMENTS HAVE BEEN MADE.

Thank You!

Please make check payable to: COLUMBIA INT. FORENSICS LAB.

Remit to:

COLUMBIA INT'L FORENSICS LAB
202 Casey Court
Newport, Wa. 99156-9363
(509) 447-2067

COLUMBIA INTERNATIONAL FORENSICS LABORATORY

202 Casey Court, Newport, WA 99156-9363
 PH: (509) 447-2067 / FX: (509) 447-4184
 DAYLAD WORKS • FORENSIC MICROSCOPIST
 info@pavn.com • www.pavn.com/4067

=====
 Invoice number - **b3.0709f** Invoice date - 10 April 2014
 =====

Requesting Agent:

Reference:

Richard F. Lee
 Attorney at Law
 P. O. Box 7550
 Spokane, WA 99207
 509-536-0986

Re: Gerlach, Gail H.
 13-1-01907-9

DATE	Hr:Mn	\$\$/hr.	DESCRIPTION	\$total
04/01/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	3:00	250.	Court Consultation:	\$ 750.00
04/02/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	6:30	250.	Court Consultation:	\$1500.00
04/03/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	7:40	250.	Court Consultation:	\$1750.00
04/04/14	2:00	250.	Examination / Consultation:	\$ NA.
04/05/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	2:00	250.	Examination / Consultation:	\$ 500.00
04/07/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	6:30	250.	Court Consultation:	\$1625.00
04/08/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	1	1100.	Expert witness fee: 1st Hour 1st Day	\$1100.00
"	7:00	125.	after first hour: 1st. Day	\$ 875.00
"	:	250.	Court subsequent days:	\$
"			Expenses:	\$ NA.
04/09/14	2:00	125.	Travel time:	\$ 250.00
"			mileage: .54 X 78 Miles:	\$ 42.12
"	8:00	250.	Court subsequent days:	\$1000.00
"			Expenses:	\$ NA.

Total Due: \$11144.84.

Payable upon receipt

ALL CHARGES ARE DUE AND PAYABLE WITHIN 30 DAYS
 UNLESS OTHER ARRANGEMENTS HAVE BEEN MADE.

Thank You!

=====
 Please make check payable to: COLUMBIA INT. FORENSICS LAB.
 =====

Remit to:

COLUMBIA INT'L FORENSICS LAB
 202 Casey Court
 Newport, Wa. 99156-9363
 (509) 447-2067

Robert B. Smith

Stay safe,

SAFE LLC



INVOICE

INVOICE #2013 02, PAGE 1

DATE: APRIL 12, 2014


TO:

Richard Lee, J.D., M.Div., WSBA#32329
 Attorney at Law
 P.O. Box 7550
 Spokane, WA 99207

FOR:

State of Washington v. Gail Gerlach
 Expert Witness

DESCRIPTION	HOURS	RATE	AMOUNT
9/14/2013 Phone discussion of case with Mr. Lee. Set up Drop Box account for discovery, e-mail. NO CHARGE.	1.75	\$150./hr.	0.
Review case files/discovery. Initial discovery review fee to determine acceptance of case.	1.5		\$1,000.
9/15/2013 Review discovery. Accept case.	3.0		Incl.
9/16/2013 Review discovery. Start paper and electronic files, organize same.	3.0	\$150./hr.	\$450.
9/17/2013 Meeting with Mr. Lee at SAFE Spokane office.	2.5	\$150./hr.	\$375.
9/19/2013 Meeting with Mr. Lee on case.	2.0	"	\$300.
9/19/2013 Sent Mr. Lee light calculator and time/distance charts/data after consulting with associate on same.	1.0	"	\$150.
Additional review of discovery incl. review scene video done by SPD.	1.0	"	\$150.
Research on Springfield XD handgun.	0.5	"	\$75.
9/21/2013 Interviewed Gail Gerlach.	1.5	"	\$225.
9/24/2013 Test fire and video same, a Springfield XD pistol per Mr. Lee request. Includes travel to and time on range.	3.0	"	\$450.
9/27/2013 Second test fire and video of Springfield XD pistol. Includes travel to and time on range.	3.0	"	\$450.
9/28/2013 Simulate/re-create moving vehicle time/distance measurements utilizing MPH and FPS and gun draw. Action/reaction study.	2.0	"	\$300.
10/2/2013 Examined vehicle involved at Alki storage location w/attorneys and SPD Det. Gallion.	1.5	"	\$225.
10/7/2013 Meeting w/Mr. Lee at SAFE Spokane office.	2.75	"	\$412.50.
10/25/2013 Court w/Mrs. Lee and Stevens, suppression hearing.	2.0	"	\$300.
SUB TOTAL			\$4,862.50

Robert B. Smith*Stay safe,*SAFE LLC
**INVOICE**INVOICE #2013 02, PAGE 2
DATE: APRIL 12, 2014**TO:**Richard Lee, J.D., M.Div., WSBA#32329
Attorney at Law
P.O. Box 7550
Spokane, WA 99207**FOR:**State of Washington v. Gail Gerlach
Expert Witness

DESCRIPTION	HOURS	RATE	AMOUNT
11/12/2013 Meeting w/Mr. Lee.	1.5	\$150./hr.	\$225.
11/14/2013 Formulate questions for Mr. Lee to ask, provide answers.	2.0	"	\$300.
1/19/2014 Communications w/Mr. Lee.	0.5	"	\$75.
1/22/2014 Property bldg. on Alki w/Mr. Lee, Mr. Warren to view XD pistol and child car seat.	1.0	"	\$150.
1/21/2014 Phone consultation w/Mr. Lee.	.25	"	\$37.50.
3/10/2014 Case notes review.	2.0	"	\$300.
3/11/2014 Case notes review, formulate questions.	2.5	"	\$375.
3/12/2014 Lengthy discussion w/peer investigator over concerns of strategy of defense over issues of use of lethal force.	2.5	"	\$375.
3/13/2014 As above w/expert Warren, phone consultation.	0.5	"	\$75.
3/13/2014 As above w/expert Ayoob, phone consultation.	0.5	"	\$75.
3/13/2014 Meeting w/Mr. Lee, peer investigator over strategy in light of above consultations.	2.5	"	\$375.
3/24/2014 Review case notes, video, photos.	2.5	"	\$375.
3/25/2014 Meet w/Mr. Lee, case review.	1.5	"	\$225.
3/27/2014 Meet at Mr. Lee's office, court preparation, review. Phone consultation w/expert Ayoob.	2.25	"	\$337.50.
3/29/2014 Case research.	1.0	"	\$150.
3/29/2014 Case review/practice w/Mr. Stevens.	2.25	"	\$337.50.
3/30/2014 Case review.	0.5	"	\$75.
SUB TOTAL			\$8725.00

Robert B. Smith*Stay safe,***INVOICE**SAFE LLC


INVOICE #2013 02, PAGE 3

DATE: APRIL 14, 2014

TO:Richard Lee, J.D., M.Div., WSBA#32329
Attorney at Law
P.O. Box 7550
Spokane, WA 99207**FOR:**State of Washington v. Gail Gerlach
Expert Witness

DESCRIPTION	HOURS	RATE	AMOUNT
3/30/2014 Expert testimony preparation.	2.5	\$150./hr.	\$375.
3/31/2014 Day 1 of Trial. Trial day rate is \$1500/day to include all day in court and/or immediately available for recall to court if stepped out. Observe trail and advise counsel during same.		\$1,500./day	\$1,500.
3/31/2014 After court practice expert qualification.	2.5	\$150./hr.	\$375.
4/1/2014 Day 2 of trial. As above.			\$1,500.
4/1/2014 After court case preparation w/Mr.'s Lee and Stevens.	1.5	"	\$225.
4/2/2014 Day 3 of trial. As above.			\$1,500.
4/3/2014 Day 4 of trial. As above.			\$1,500.
4/4/2014 Consultation and review w/Mr. Stevens at Mr. Lee's office.	3.0	\$150./hr.	\$450.
4/5/2014 Practice/review w/Mr. Stevens at Mr. Lee's office.	2.0	"	\$300.
4/6/2014 Practice/review w/Mr. Stevens at Mr. Lee's office.	2.0	"	\$300.
4/7/2014 Day 5 of trial. As above.			\$1,500.
4/8/2014 Day 6 of trial. As above and includes my testimony in most of afternoon.			\$1,500.
4/9/2014 Day 7 of trial. As above.			\$1,500.
4/10/2014 To court for rendering of verdicts.	2.5	\$150./hr.	\$375.
4/12/2014 Final billing preparation. Close file.	2.0	"	\$300.
2/14/2014 Court hearing. Advise counsel during testimony.	5.0	"	\$750.
2/24/2014 Case review w/Mr. Lee	.75	"	112.50.
		TOTAL	\$22,787.50.



SPOKANE POLICE DEPARTMENT

FRANK G. STRAUB, JR.
CHIEF OF POLICE



PUBLIC REQUEST FEE NOTIFICATION

Date: June 29, 2013

RICHARD LEE
PO BOX 7550
SPOKANE WA 99207

Date Request Received: April 04, 2013

Customer No/Transaction No.

Report Number(s) Requested:

Multiple reports for Brendon Kaluza-Graham

This is to notify you that the following copy fees have been applied to your request for copies of the listed report(s). Fees may be paid by cash or check and **must** be received prior to sending the requested documents. Payment for fees may be made in person or by mail. **DO NOT MAIL CASH.**

Item	Number of Units	PRICE
\$0.15 per page	281	\$42.15
CD/DVD (includes Tech time, disc, label and paper sleeve)		\$0.00
Deposit previously paid:		
Total cost to Pick up requested documents in person:		\$42.15
<p>If you would like to pick up the requested documents, please bring a copy of this letter with you to Police Records. Our business hours are Mondays, Tuesdays, Thursdays and Fridays between 8:30am and 4:00pm. If you would like to have the requested documents mailed to you, there are additional costs for envelopes and postage. Those costs are as follows:</p>		
Envelope and Postage	8-9oz Lg Flat envelope and postage	2.27
Total cost to have documents mailed to you:		\$44.42

PAYMENT FOR OR ARRANGEMENTS TO VIEW REQUESTED DOCUMENTS MUST BE RECEIVED WITHIN 30 DAYS OF THE DATE OF THIS LETTER. NON-PAYMENT OR FAILURE TO MAKE AND KEEP ARRANGEMENTS TO VIEW REQUESTED DOCUMENTS WILL RESULT IN A CANCELLATION OF THE REQUEST. TO OBTAIN A COPY OR VIEW DOCUMENTS AFTER EXPIRATION WILL REQUIRE YOU TO SUBMIT A NEW REQUEST.

Please make checks payable to: City of Spokane

Mailing Address: SPD Records Division, 1100 W. Mallon Ave., Spokane, WA 99260

Sincerely,

Frank G. Straub, Jr.
Chief of Police

DC
Police Records Specialist
Spokane Police Department

Multiple Reports, Lee, Richard 040413
FILE NAME



SPOKANE POLICE DEPARTMENT

FRANK G. STRAUB, JR.
CHIEF OF POLICE



PUBLIC REQUEST FEE NOTIFICATION

Date: June 29, 2013

RICHARD LEE
PO BOX 7550
SPOKANE WA 99207

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\$0.15 per page	281	\$42.15
CD/DVD (includes Tech time, disc, label and paper sleeve)		\$0.00
Deposit previously paid:		
Total cost to <u>Pick up</u> requested documents in person:		\$42.15
<p>If you would like to <u>pick up</u> the requested documents, please bring a copy of this letter with you to Police Records. Our business hours are Mondays, Tuesdays, Thursdays and Fridays between 8:30am and 4:00pm. If you would like to have the requested documents <u>mailed</u> to you, there are additional costs for envelopes and postage. Those costs are as follows:</p>		
Envelope and Postage	8-9oz Lg Flat envelope and postage	2.27
Total cost to have documents <u>mailed</u> to you:		\$44.42

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Please make checks payable to: City of Spokane

Mailing Address: SPD Records Division, 1100 W. Mallon Ave., Spokane, WA 99260

Sincerely,

Frank G. Straub, Jr.
Chief of Police

DC
Police Records Specialist
Spokane Police Department

Multiple Reports, Lee, Richard 040413
FILE NAME



SPOKANE POLICE DEPARTMENT

FRANK G. STRAUB, JR.
CHIEF OF POLICE



PUBLIC REQUEST FEE NOTIFICATION

Date: June 29, 2013

RICHARD LEE
 PO BOX 7550
 SPOKANE WA 99207

Date Request Received: April 04, 2013

Customer No/Transaction No.

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\$0.15 per page	281	\$42.15
CD/DVD (includes Tech time, disc, label and paper sleeve)		\$0.00
Deposit previously paid:		
Total cost to <u>Pick up</u> requested documents in person:		\$42.15
<p>If you would like to <u>pick up</u> the requested documents, please bring a copy of this letter with you to Police Records. Our business hours are Mondays, Tuesdays, Thursdays and Fridays between 8:30am and 4:00pm. If you would like to have the requested documents <u>mailed</u> to you, there are additional costs for envelopes and postage. Those costs are as follows:</p>		
Envelope and Postage	8-9oz Lg Flat envelope and postage	2.27
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Please make checks payable to: City of Spokane

Mailing Address: SPD Records Division, 1100 W. Mallon Ave., Spokane, WA 99260

Sincerely,

Frank G. Straub, Jr.
 Chief of Police

DC
 Police Records Specialist
 Spokane Police Department

Multiple Reports, Lee, Richard 040413
 FILE NAME

State v. Gail H. Gerlach, Spokane County Superior Court No. 13-1-01907-9

Richard Lee billing

Drafted NOA and discovery .25 5/29/2013
0.25

Conferred with witness Sharon Gerlach, .40 5/30/13
0.4

Worked on Jury Instructions from WPIC .5 5/30/13
0.5

Went to courthouse to file documents, served prosecutor NOA and discovery demand. 1.5 5/30/13
1.5

Research in the Sentencing Guidelines 1.5 5/30/13
1.5

Research on caselaw related to self defense. 1.0 6/1/13
1

Conferred with client regarding arraignment .5 6/7/13
0.5

Phone call with client .25 6/11/13
0.25

Arraignment with client including meeting and follow up. 1.5 6/12/13
1.5

Conferred with client concerning research and defense. 3.5 6/13/13
3.5

Conferred with client over insurance and discovery acquisitions .5 6/14/13
0.5

Spoke with prospective expert witnesses 1.5 hours 6/17/13
1.5

Spoke with eyewitness Mrs. Webb, .5 hours 6/17/13
0.5

Began review of law enforcement reports 1.5 hours 6/17/13
1.5

First comparison and contrast in law enforcement document review 3.0 hrs 6/17/13

3

Drafted response to State's Omnibus application, delivered and filed, served Prosecutor's Office. .75
6/18/13

0.75

Conference with co-counsel, and reviewed photographs. .5 6/18/13

0.5

Conference with assistant legal counsel and working out details on expert witness. .40 6/18/13
t witness Gaylan Warren and Don Brockett.

t .4 6/18/13

0.4

Began drafting jury instructions with all references 3.0 hrs. 6/19/13

3

Conference with Gaylan Warren on case. .5 hrs 6/20/13

0.5

Conferred with client and discussed investigation of case. .75 6/20/13

0.75

Went over case materials with client. 2 hrs. 6/20/13

2

Studied each investigative report; 4 hrs. 6/23/13

4

Conference with client; 2 hours 6/23/13

2

Researched and prepared jury instructions; 2.5 hrs 6/23/13

24/13

2.5

Conference with client; .25 6/24/13

.25 6/25/13

0.25

Contacted forensics report unit; went to retrieve discovery; .5 6/27/13

0.5

Went over discovery videography; conference with client; co-counsel 2.5 6/27/13

2.5

Prepared schedule for witness interviews. .40 6/27/13
0.4

Prepared another draft of jury instructions, reviewed message from opposing counsel. 1.5 hrs 7/1/13
1.5

Met with client and went over defense and witnesses. 2.75hrs 7/1/13
2.75

Conference with expert witness Gaylan Warren and client. 1.25 7/2/13
1.25

Follow up with expert and exploration of the crash site. .25 7/2/13
0.25

1

Beginning closing argument and drafting witness list, reviewing witness statements.
7/15/13 3.5 hrs 3.5

Conversed with Gaylan Warren on case 7/16/13 .75
0.75

Conversed with co-counsel Dave Stevens 7/16/13 .25
0.25

Follow up message to prosecutor 7/17/13 .25
0.25

Conferred with Gail Gerlach 7/18/13 1.0
1

Worked on scheduling for all witness interviews. Mon 7/29/13 .25
0.25

Conference with Gail Gerlach Tue 7/30/13 1.5
1.5

Spoke with Gaylan Warren on case, and witness Dave Williams Wed 7/31/13 .5
0.5

Conference with Gail Gerlach Tue 8/06/13 1.0
1

Conference with co-counsel Dave Stevens Wed 8/07/13 1.5
1.5

Analysis of case facts; travel time to Holy Family Hospital to interview witness. Thur 8/08/13 .75
0.75

Interview of Dr. Sally Aiken. Thurs 8/08/13 .5
0.5

Follow up with prosecutor; finalizing notations; discussion of case Thurs 8/08/13 .75
0.75

Drafting pleadings, research into trial motions Thurs 8/08/13
1.5 1.5

Drafting Motions, declaration, order and developing defense Thurs 8/08/13 2.0
2

Travel time to interview Fri 8/09/13 .40
0.4

Interview with Officers Honiker and House Fri 8/09/13 2.0
2

Travel time from interview Fri 8/09/13 .40
0.4

Discussion of case and summaries, formating motions. Fri 8/09/13
0.4

Travel time to interview Mon 8/12/13 .40
0.4

Preparation for interview Mon 8/12/13 .40
0.4

Interview of Off. Cordis Mon 8/12/13 2.60
2.6

Return from interview Mon 8/12/13 .40
0.4

Interview and updated status of case with Mr. Gerlach Mon 8/12/13 2.0
2

Conference on case and reviewed witnesses' reports. Tues 8/13/13 2.0
2

Travel time to courthouse Tues 8/13/13 .40
0.4

Met with Heidi Clarke re: Preassignment Tues 8/13/13 .20
0.2

Conducted interview with Det. Cestnik Tues 8/13/13 1.5
1.5

Filed motion, conformed copies, provided courtesy copies to Judge Plese, prosecutor Tues 8/13/13 .30
0.3

Present for interview with Det. Cestnik Tues 8/13/13 1.5 with Forensic scientist Davis Tues
8/13/13 .30 0.3

Follow up with expert Gaylan Warren Tues 8/13/13 1.0
1

Travel time from courthouse Tues 8/13/13 .40
0.4

Conferred with Gail Gerlach 8/13/13 .5
0.5

Travel time to meet with Officer B. Aitken Wed 8/14/13 .40
0.4

Interview with Officer B. Aitken Wed 8/14/13 .5
0.5

Follow up with Heidi Clarke; discussed trial date and confirmation of hearing Wed 8/14/13 .30
0.3

Conference with co-counsel and advisory counsel on self-defense Wed 8/14/13 2.0
2

Travel time to prosecutor's office Wed 8/14/13 .30
0.3

Interview with Officer K. Applewhaite and Det. B. Estes Wed 8/14/13 2.70
2.7

Follow up with prosecutor on CrR 3.6 motion; scheduling Wed 8/14/13 .10
0.1

Discussion of case with co-counsel and meeting with client Gail Gerlach Wed 8/14/13
1

Continuing work on closing summation and conference with counsel. Mond 8/19/13
3

Work on closing summation continued. Tuesday 8/20/13
3

Follow up and continued work on summation, discussion of motions with counsel. Wed 8/21/13
2.5

Worked on closing argument. Mon. 9/9/13
3

Drafting pleadings, communicated with co-counsel Tues 9/10/13
3.5

Continued on closing argument, legal research on admissions Tues 9/10/13 1.0
1

Started on legal briefing. Wed. 9/11/13 1.5
1.5

Conferred with client. Wed 9/11/13
0.5

Worked on evidentiary research Wed 9/11/13
1

Communicated with co-counsel Wed 9/11/13 .10
0.1

Continued on closing argument. Wed 9/11/13 1.2
1.2

Worked on admissions research Wed 9/11/13 2.5
2.5

Updated file and reviewed signed orders Wed 9/11/13 .10
0.1

Conferred with client spouse re: additional expert Fri 9/13/13 .30
0.3

Conferred with additional expert witness; follow up with documentation Sat. 9/14/13 3.0
3

Worked on closing argument. Mon. 9/9/13 Sunday 9/15/13 .30
0.3

Follow up with additional witness Sun. 9/15/13 .30
0.3

Worked with exhibits, closing argument drafting Mon. 9/16/13 1.0
1

Continued working on closing, Mon. 9/17/13 2.0 Mon. 9/16/13 2.0
2

Preparing illustrative exhibits, workproduct Mon 9/16/13 1.0
2

Case and trial preparation Tues 9/17/13 2.5
2.5

Reviewed correspondence from civil attorney (no charge) Tues 9/17/13 .40
0.4

Conference with client on trial Tues 9/17/13 1.20
1.2

Travel time to see expert Robert Smith Tues 9/17/13 .5
0.5

Conference with Robert Smith on testimony to be given at trial Tues 9/17/13 2.0

2

Travel time from conference with expert Smith Tues 9/17/13 .5

0.5

Meeting with Gail Gerlach and expert witness Bob Smith Thurs 9/18/13 3.5

3.5

Conference with Gaylan Warren Frid 9/20/13 .40

0.4

Drafted brief for motion to be heard Oct. 3, conferred with co-counsel. Fri 9/20/13 .60

0.6

Went over concepts for closing argument; Sunday 9/22/13 1.0

1

Spoke with Gaylan Warren; drafted motion and brief to compel. Monday 9/23/13 1.5

1.5

Edited motions to compel; reviewed motion to suppress. Mon. 9/23/13 3.5

3.5

Continued edits over motions. 3

Tues 9/24/13 3.7

3.7

Travel time to Superior court. Tues 9/25/13 .40

Tues 9/24/13 .3

0.4

Filed motions, conformed copies, served prosecutor's office. Tues 9/25/13 .30

Tues 9/24/13 .30

0.3

Travel time from Superior Court clerk. Tues 9/25/13 .40

Tues 9/24/13

0.4

Review and composed outlines for closing summation, and evidentiary issues. Wed. 9/26/13 4.5

9/25/2013 4.5

4.5

Conference with client on trial and interviews. Thurs. 9/27/13 2.0

9/26/2013 2

2

Constructed and reviewed demonstrative exhibits, and approved final exhibits. Thurs 9/27/13 1.0
9/26/2013 1

1

Conference with co-counsel; and response to clerk. Friday 9/28/13 1.5
Friday 9/27/13 13 1.5 1.5

Discussed draft of closing argument with co-counsel and trial strategy. Sun 9/29/13 1.0
1

Reviewed interview questions for witnesses Mon. 9/30/13 .5
0.5

Interviewed morning witness with opposing counsel present. Mon 9/30/13 1.0
1

Follow up with notations; conferred with co-counsel Mon. 9/30/13 .5
0.5

First afternoon witness Mond 9/30/13 .5
0.5

Second afternoon witness Mond 9/30/13 .75
0.75

Third afternoon witness Mond 9/30/13 .5
0.5

All notations updated; served new notice for hearing; conformed copies, served prosecutor Mond
9/30/13 1.0
1

Follow up with updating trial notebook, discussed questions and approaches to witnesses for trial. Mond
9/30/13 2.0
2

Contacted expert witnesses for meeting times, and discussed scene reconstruction for trial. Mond
9/30/13 .75
0.75

Reviewed trial notebook for next set of witness interviews. Mond 9/30/13 .75
0.75

First Tuesday witness interview; Tues 10/1/13 .5
0.5

Follow up and conferred with expert Warren. Tues 10/1/13 .5
0.5

Travel time to Public Safety Building, conferred with co-counsel on questions. Tues 10/1/13 .60
0.6

Present at Forensics; went over reports and waited for prosecutor. Tues 10/1/13 .5
0.5

Interview with Forensics' Jodie Dewey. Tues 10/1/13 .40
0.4

Interview with Sgt. Joel Fertakis. Tues 10/1/13 .40
0.4

Follow up with co-counsel, went over notations. Tues 10/1/13 .70
0.7

Reviewed possible cross examination; closing argument. Tues 10/1/13 1.5
1.5

Discussed questions for interview, travel time to Alki property warehouse. Wed. 10/2/13 .40
0.4

Present with two expert witnesses for their examination of vehicle. Wed. 10/2/13 .5
0.5

Follow up with expert witnesses Warren and Smith. Wed. 10/2/13 .10
0.1

Follow up with co-counsel, prepared for interview with State's witness Det. Gallion. Wed. 10/2/13 .5
0.5

Travel time to Public Safety Building. Wed 10/2/13 .40
0.4

Conferred with expert witnesses. Wed. 10/2/13 .10
0.1

Interview with Det. Gallion. Wed. 10/2/13 1.5

1.5

Travel time return. Wed. 10/2/13 .40

0.4

Debriefing with co-counsel, discussed findings, prepared for cross exam. Wed 10/2/13

13 .60

0.6

Reviewed officer reports in anticipation of interviews. Thurs 10/3/13 1.0

1

Travel time to prosecutor's office. Thurs 10/3/13 .40

0.4

Present for interview with Lt. Mark Griffiths, Medic Grooms, Fire Marshall Jones, and Forensic specialist Swenson. Thurs 10/3/13 3.0

3

Travel time back to office. Thurs 10/3/13 .40

0.4

Debriefing with co-counsel, discussed findings, prepared for cross exam. Thurs 10/3/13

0.6

0.6

Conference with client Gerlach with co-counsel. Thurs 10/3/13 1.5

1.5

Prepared for afternoon interview with Officer Tilley. Frid 10/4/13 .40

0.4

Travel time to prosecutor's office. Frid. 10/4/13 .40

0.4

Present for interview with Off. Tilley. Frid 10/4/13 1.0

1

Follow up with prosecutor, discussed further dates and viewing of evidence. Fri 10/4/13 .10

0.1

Travel time back to office. Frid 10/4/13 .40

0.4

Follow up with message to prosecutor, clerical time. Frid 10/4/13 .10
0.1

Discussion with co-counsel, trial strategy. Frid 10/4/13 .30
0.3

Discussion with expert Warren and trial strategy. Mon. 10/7/13 .5
0.5

Travel time to meet with expert Smith. Mon. 10/7/13 .5
0.5

Meeting with expert Bob Smith to discuss testimony of witnesses and his expert testimony. Mon.
10/7/13 2.5
2.5

Travel time back to office. Mon. 10/7/13 .5
0.5

Reviewed maps and documents/diagrams. Tues. 10/8/13 .60
0.6

Conferred with client on testimony and strategy. Tues 10/8/13 2.0
2

Interview with defense witness. Wed. 10/9/13 .10
0.1

Update to defense witness list. Wed. 10/9/13 .30
0.3

Update to subpoenas. Wed. 10/9/13 .20
0.2

Began prepatory work for jury selection. Thurs 10/17/13 4.5
4.5

Continued preparation for closing summation and cross exam. Frid. 10/18/13 4.5
4.5

Conferred with expert Bob Smith. Frid 10/18/13 .75
0.75

Confirmed hearing with client. Sat. 10/19/13 .25
0.25

Conferred with Medical Expert office; responded to message re hearing. Mond 10/21/13 .40
0.4

Continued with direct and cross exam; jury selection preparation. Mond 10/21/13 3.5
3.5

Met with client and expert Bob Smith. Mond 10/21/13 2.0
2

Conferred with expert Gaylan Warren. Tues 10/22/13 .30
0.3

Continued preparation for cross exam; direct exam. Tues 10/22/13 2.0
2

Continued with direct and cross exam preparation, jury selection process. Wed. 10/23/13 3.5
3.5

Closing summation preparation, conferral with co-counsel Dave Stevens. Wed. 10/23/13 3.0
3

Reviewed opposing counsel brief. Thurs 10/24/13 .30
0.3

Jury selection preparation. Thurs 10/24/13 .10
0.1

Reviewed photos for interview. Thurs 10/24/13 .60
0.6

Conferred with expert Bob Smith. Thurs. 10/24/13 .40
0.4

Continued review of photos, police report. 10/24/13 .50
0.5

Travel time to Forensics. Thurs 10/24/13 .40
0.4

Conference with prosecutor, interview with Natalie Shrum. Thurs 10/24/13 .60
0.6

Follow up with prosecutor. Thurs 10/24/13 .40

0.4

Travel time from prosecutor's office. Thurs 10/24/13 .40

0.4

Follow up with co-counsel, updated notations. Thurs 10/24/13 .10

0.1

Preparing closing summation. Thurs 10/24/13 1.0

1

Prepared notes for each witness, continued with closing summation. Thurs 10/24/13 2.5

2.5

Conference with prosecutor via e-mail, response. Frid 10/25/13 .10

0.1

Notations prepared, reviewed both motions for afternoon docket. Frid 10/25/13 2.0

2

Travel time to court. Friday 10/25/13 .40

0.4

Interviewed last defense witness. Fri. 10/25/13 .30

0.3

Present for CrR 3.5 hearing, notations; motion to compel and continuance. Fri. 10/25/13 3.5

3.5

Follow up with client. Fri. 10/25/13 .30

0.3

Reviewed jury instructions; did advance trial preparation. Fri. 10/25/13 .30

0.3

Conference with client. Mond. 10/28/13 .5

0.5

Further preparing closing summation Tues. 10/29/13 3.5

3.5

Sent message to prosecutor for follow up. Mon. 11/4/13 .10

0.1

Conference with co-counsel and inquiry into transcript. Mon. 11/4/13 .10
0.1

Responded to Prosecutor Martin inquiry about continuance. Tues. 11/19/13 .10
0.1

Began briefing on part two of hearing, motion to compel. Fri. 1/3/14 2.0
2

Conference with co-counsel. Fri. 1/3/14 .20
0.2

Drafting motion, preparing subpoenas, and brief. Mon. 1/6/14
3.5 3.5

Consulted expert witness Smith. Mon. 1/6/14 .10
0.1

Finalized Motion to dismiss or compel. Tues. 1/7/14 2.5
2.5

Travel time to court. Tues. 1/7/14 .40
0.4

Filed and served documents. Tues. 1/7/14 .20
0.2

Travel time-returned. Tues. 1/7/14 .40
0.4

Prepared for summation. Wed. 1/8/14 .40
0.4

Prepared defense witness list. Fri. 1/10/14 .5
0.5

Travel time to courthouse to file witness list. Fri. 1/10/14 .40
0.4

Filed and served Defense witness list on Prosecutor. Fri. 1/10/14 .20
0.2

Travel time-returned. Fri. 1/10/14 .40
0.4

Conferred with client. Fri. 1/10/14 .10
0.1

Preparation for trial including jury selection, examination, opening statement. Sun. 1/12/14 1.5
1.5

Reviewed law enforcement reports; notations. Mon. 1/13/14 2.5
2.5

Conference with Gaylan Warren. Mon. 1/13/14 .20
0.2

Finished notations for trial. Mon. 1/13/14 2.5
2.5

Conferred with counsel on closing argument. Wed. 1/15/14 .5
0.5

Conferred with client. Wed. 1/15/14 .5
0.5

Reviewed opposing counsel brief. Wed. 1/15/14 .30
0.3

Worked on witness statements for closing arguments; Mond. 1/20/14 6.5
6.5

Scheduled viewing of evidence, conferred with two expert witnesses. Tues 1/21/14 .30
0.3

Worked on closing argument presentations for all witnesses. Tues 1/21/14 7.5
7.5

Travel time to evidence location. Wed. 1/22/14 .20
0.2

Meeting to go over physical evidence with opposing counsel and experts. Wed. 1/22/14
0.5

Conference with two experts and debriefing; travel time return. Wed. 1/22/14 .5
0.5

Continued with closing argument preparation; demonstrative exhibits. Thurs 1/23/14 9.5
9.5

Began summarizing testimony with photos and closing argument. Frid. 1/24/14 6.5
6.5

Discussed follow up brief. Frid 1/24/14 .10
0.1

Continued with closing argument and exhibit pictures. Frid 1/24/14 3.5
3.5

Met with client to discuss testimony and evidence. Sat. 1/25/14 1.0
1

Began drafting and editing opening statement; closing argument presentations with extensive exhibits. Mon. 1/27/14 10.5
10.5

Contined with edits to closing statement. Wed. 1/29/14 1.0
1

Prepared supplemental response to State's supplement; conferred with co-counsel. Thurs.
1/30/14 3.0
3

Reviewed edits of supplemental response. Frid. 1/31/14 .30
0.3

Travel time to court for filing. Frid. 1/31/14 .40
0.4

Filed and served conformed copies. Frid. 1/31/14 .20
0.2

Travel time, returned. Frid. 1/31/14 .40
0.4

Edited additions to closing argument. Frid. 1/31/14 4.5
4.5

Preparing direct examination questions for defense. Mond. 2/3/14 5.5
5.5

Revising expert witness questions and presentation. Tues. 2/4/14 5.5
5.5

7.5 Gathering exhibits, more edits to questions, opening statement, closing argument. Wed. 2/5/14
7.5

Further revisions to closing argument, questions, and upgrades to closing. Thurs. 2/6/14 8.0
8

Conferred with Gaylan Warren. Frid 2/7/14 .30
0.3

Prepared response to Prosecutor. Frid 2/7/14 .10
0.1

Prepared questions for both experts and feedback from experts. Frid 2/7/14 .30
0.3

Conferred with client. Frid 2/7/14 .20
0.2

Reviewed reports and preparation for trial; hearing. Frid. 2/7/14 2.5
2.5

Follow up with co-counsel. Frid 2/7/14 .10
0.1

Confirmed hearing for Friday. Mond. 2/10/14 .10
0.1

Reworked entire presentation for closing. Mond. 2/10/14 11.5
11.5

Conferred with Robert Smith. Mond. 2/10/14 .20
0.2

Met with client to go over hearing. Mond. 2/10/14 1.0
1

Met with Robert Smith. Mond. 2/10/13 2.0
2 2/10/14 2.0

Continued drafting questions for expert witnesses. Mond. 2/10/14
14 1.0 1

Went over the presentation and reports/witnesses. Tues. 2/11/14 2.5
2.5

Reviewed Detective Gallion testimony. Tues. 2/11/14 1.5
1.5

Updated and revised closing argument, with edits. Thurs 2/13/14 3.0
3

Prepared outline for CrR 3.5 and mtn to compel. Thurs 2/13/14 1.5
1.5

Reviewed all briefing: prepared for hearing. Frid. 2/14/14 1.5
1.5

Travel time to court with client. Frid. 2/14/14 .40
0.4

Present for CrR 3.5 hearing and cross exam, argument; closing. Frid 2/14/14 2.5
2.5

Returned to office. Frid. 2/14/14 .40
0.4

Updates to argument, discussed exhibits with co-counsel David Stevens. Fri. 2/14/14 .5
0.5

Reviewed Det. Gallion Testimony in anticipation of trial. Sat. 2/15/14 2.0
2

Updated closing argument. Sat. 2/15/14 .40
0.4

Prepared photographic exhibits for defense. Sat. 2/15/14 .5
0.5

Prepared exhibits and all exhibit books, proofreading and selection. Sat. 2/15/14 4.5
4.5

Letter to opposing counsel. Sat. 2/15/14 .20
0.2

Conference with client. Mond. 2/17/14 .60
0.6

Conferred with co-counsel; began drafting findings and conclusions. Mond. 2/17/14 2.5
2.5

Drafting findings of fact and conclusions of law for submission. Mond. 2/17/14 2.0

2

Drafted two notices for submission to Court. Mond. 2/17/14 1.0

1

Prepared letter to civil counsel. Mond. 2/17/14 .20

0.2

Edited motion in limine for filing. Mond. 2/17/14 .20

0.2

Finalized Notices for filing, conferred with co-counsel. Tues. 2/18/14 .5

0.5

Travel time to court. Tues. 2/18/14 .40

0.4

Filed and serviced notices. Tues 2/18/14 .30

0.3

Travel time returned. Tues. 2/18/14 .40

0.4

Conferred with co-counsel, edited presentment order. Tues. 2/18/14 .30

0.3

Travel time back to court. Tues. 2/18/14 .40

0.4

Filed and served presentment order with Note for Hearing. Tues. 2/18/14 .30

0.3

Travel time returned. Tues. 2/18/14 .40

0.4

Follow up with co-counsel and Gail Gerlach. Tues 2/18/14 .5

0.5

Edited Joint Trial Management Report and conferred with co-counsel. Wed. 2/19/14 .5

0.5

Conference with co-counsel on subpoenas to be issued in event of trial. Wed. 2/19/14 .5

0.5

Edited closing argument. Wed. 2/19/14 .5
0.5

Prepared for closing summation. Wed. 2/19/14 1.0
1

Reviewed witness interviews. Thurs. 2/20/14 2.0
2

Legal research on RCW 46.61.600. Thurs. 2/20/14 .5
0.5

Received call from prosecutor to discuss case. Frid. 2/21/14
0.2 0.2

Conferred with client. Frid. 2/21/14 1.0
1

Went over case with co-counsel. Frid. 2/21/14 .30
0.3

Trial preparation. Sat. 2/22/14 .5
0.5

Conferred with prosecutor, co-counsel. Mond. 2/24/14 .10
0.1

Discussed testimony with expert witness Smith. Mond. 2/24/14 1.2
1.2

Trial preparation. Mond. 2/24/14 1.0
1

Continued with joint management report. Tues. 2/25/14 2.5
2.5

Responded to Prosecutor Martin. Tues. 2/25/14 .10
0.1

Conferred with client. Tues. 2/25/14 .10
0.1

Conference with David Stevens. Wed. 2/26/14 .5
0.5

Drafted order to compel. Wed. 2/26/14 .40
0.4

Reviewed motions and memo in limine. Wed. 2/26/14 .5
0.5

Updated closing argument. Wed. 2/26/14 3.5
3.5

Following up with co-counsel. Wed. 2/26/14 .5
0.5

Went over filings to be submitted to Court with Dave Stevens. Thurs. 2/27/14 .30
0.3

Conferred with Dave Stevens by phone. Thurs. 2/27/14 .20
0.2

Worked on closing argument and conferred with co-counsel. Thurs. 2/27/14 .30
0.3

Conference with co-counsel. Frid. 2/28/14 .30
0.3

Reviewed closing argument and opening statement. Frid. 2/28/14 2.5
2.5

Prepared documents for filing. Frid. 2/28/14 .10
0.1

Travel time to courthouse. Frid. 2/28/14 .40
0.4

Served documents on prosecutor's office, conformed copies, filed original. Frid. 2/28/14 .20
0.2

Travel time, returned. Frid. 2/28/14 .40
0.4

Conferred with co-counsel on final documents for presentment. Mond. 3/3/14 .20
0.2

Discussed pretrial and presentment with client and testimony. Tues. 3/4/14 1.2
1.2

Travel time to court for presentment/pretrial. Wed. 3/5/14 .40
0.4

Pretrial hearing and presentment. Wed. 3/5/14 .5
0.5

Follow up with client. Wed. 3/5/14 1.0
1

Travel time returned. Wed. 3/5/14 .40
0.4

Edited closing argument. Thurs. 3/6/14 1.5
1.5

Continued with closing argument, and reviewed case file for testimony. Thurs 3/6/14 .20
0.2

Travel time to courthouse to file jury questionnaire and serve. Thurs. 3/6/14 .40
0.4

Filed and served jury questionnaire. Thurs. 3/6/14 .20
0.2

Returned to office. Thurs. 3/6/14 .40
0.4

Continued with closing argument. Frid. 3/7/14 .5
0.5

Legal research on self-defense. Mond. 3/10/14 2.0
2

Conference with client. Mond. 3/10/14 1.0
1

Conferred with Bob Smith, closing preparation. Tues. 3/11/14 .60
0.6

Meeting with Gaylan Warren; went over exhibits. Wed. 3/12/14 1.0
1

Worked on closing presentation. Wed. 3/12/14 1.5
1.5

Conference with investigator; and expert Bob Smith. Thurs. 3/13/14 1.5
1.5

Continued with closing argument. Thurs. 3/13/14 2.0

2

Follow up with experts information; conferred with co-counsel. Fri. 3/14/14 .30

0.3

Continued with closing summation. Frid. 3/14/14 2.5

2.5

Reviewed demonstrative exhibits; jury instructions. Frid. 3/14/14 2.0

2

Edits on closing summation, conferred with both expert witnesses. Sat. 3/15/14 .5

0.5

Conferred with client; trial preparation. Sat. 3/15/14 2.0

2

Edits on closing summation, conferred with co-counsel. Sat. 3/15/14 1.5

1.5

Conferred with expert Bob Smith; reviewed officer reports; met with client. Mon. 3/17/14 2.0

2

Continued with witness/officer statements; final summation. Mond. 3/17/14 4.5

4.5

More closing argument edits; trial preparation checklist. Mond. 3/17/14 2.0

2

Conferred with expert on testimony, more additions/edits to closing summation. Tues. 3/18/14

2.5

2.5

Continued preparation of closing summation. Thurs. 3/20/14 2.0

2

Conferred with associate counsel on case; jury selection and closing argument. Frid. 3/21/14 2.5

2.5

Preparing subpoena duces tecum. Frid. 3/21/14 .5

0.5

Drafted subpoena duces tecum. Frid. 3/21/14 .40
0.4

Travel time to courthouse. Frid. 3/21/14 .40
0.4

Filed and served subpoena duces tecum. Frid. 3/21/14 .20
0.2

Returned time. Frid. 3/21/14 .40
0.4

Conferred with co-counsel on case. Sund. 3/23/14 1.5
1.5

Began drafting adjusted closing and opening statements. Mond. 3/24/14 5.5
5.5

Conference with Gaylan Warren. Mond. 3/24/14 .5
0.5

Conference with Gaylan Warren. Mond. 3/24/14 .5
0.5

Reviewed each officer/investigator testimony highlights. 2.0
Mond. 3/24/14 2.0 2

2.0 Prepared questions for Gaylan Warren. with Gaylan Warren Mond. 3/24/14
2

Prepared questions for Bob Smith. Mond. 3/24/14 1.0 with Bob Smith Mond.
3/24/14 2.0 2

Discussed trial planning with co-counsel. Mond. 3/24/14 1.5
1.5

Met with new associate counsel Teresa Border. Tues. 3/25/14 .75
0.75

Conference on order of witnesses. Tues. 3/25/14 .20
0.2

Conference with expert witness Bob Smith and client. Tues. 3/25/14 3.5
3.5

Reviewed/proofread motions in limine/response. Tues. 3/25/14 .20
0.2

Police report review and preparation for cross exam. Tues. 3/25/14 2.0
2

Minor corrections to briefs; responded to clerk. Wed. 3/26/14 .30
0.3

Travel time to court for filing. Wed. 3/26/14 .40
0.4

Filed documents, provided exhibits to court and opposing counsel, served subpoena. Wed.
3/26/14 .60
0.6

Return time. Wed. 3/26/14 .40
0.4

Reviewed documents, opposing counsel memo, conferred with co-counsel. Wed. 3/26/14 .40
0.4

Conferred with clerk on exhibits. Wed. 3/26/14 .10
0.1

Met with Gaylan Warren for testimony review. Thurs. 3/27/14 2.0
2

Debriefed with co-counsel. Thurs. 3/27/14 .30
0.3

Met with Bob Smith for testimony review. Thurs. 3/27/14 1.5
1.5

Reviewed pleadings; worked on closing summation revision. Thurs. 3/27/14 1.0
1

Police report review. Thurs. 3/27/14 1.0
1

Reviewed pleadings; conferred with co-counsel, proofread brief. Frid. 3/28/14 .75
0.75

Travel time to court. Frid. 3/28/14 .40
0.4

Filed and conformed documents; conferred with client, present for hearing. Frid. 3/28/14 .75
0.75

Follow up; and travel time returned. Frid. 3/28/14 .5
0.5

Conferred with expert witness Smith. Frid. 3/28/14 .40
0.4

Communicated with Gaylan Warren, researched ER 704. Sat. 3/29/14 .5
0.5

Worked on closing summation. Sat. 3/29/14 .5
0.5

Met with expert witness Bob Smith for trial preparation. Sat. 3/29/14 1.5
1.5

Sunday session: Voir Dire review; case theme review; Powerpoint edits for closing argument.
Sund. 3/30/14 4.5
4.5

Travel time to court; conference with client. Mond. 3/31/14 .5
0.5

Met with co-counsel; conferred with Teresa Border; present for jury selection. Mon. 3/31/14 2.5
2.5

Prepared jury selection questions with both counsel, and discussed selection. Mond. 3/31/14
4.5
4.5

Follow up with expert witnesses; planning opening statement with client and co-counsel. Mond.
3/31/14 .5
0.5

Return time from courthouse for evening preparation. Mond. 3/31/14 .40
0.4

Continued with opening statement preparation; reviewed reports. Mond. 3/31/14 1.5
1.5

Monday evening preparation: Opening statement preparation with Powerpoint and revisions.
Mond. 3/31/14 4.0
4

Travel time to court. Tues. 4/1/14 .40
0.4

Assisted with jury preparation/selection. Feedback for co-counsel. Tues. 4/1/14 3.5
3.5

Final review over jury selection questionnaire; present with client and co-counsel into afternoon session. Tues. 4/1/14 5.5
5.5

Followed up with both expert witnesses and discussed case. Tues. 4/1/14 1.5
1.5

Travel time from courthouse for evening preparation. Tues. 4/1/14 .40
0.4

Tuesday evening session: Finalized opening statement for presentation. Tues. 4/1/14 1.0
4.5 4.5

Wednesday travel time to court. Wed. 4/2/14 .40
0.4

Present for beginning of state's opening statement. Wed. 4/2/14 .5
0.5

Present for court; defense opening statement presentation with follow up notations for cross examination. Wed. 4/2/14 .5
0.5

Notations done for case in chief in anticipation of defense case in chief, cross-examination. Wed. 4/2/14 3.0
3

Follow up with client Wed. 4/2/14 .40
0.4

Afternoon session; present for state's case; continued cross examination; conference. Wed 4/2/14 3.5
3.5

Return time from courthouse for evening session. Wed. 4/2/14 .40

0.4

Trial notebook and exhibit preparation. Wed. 4/2/14 1.5

1.5

Evening trial preparation; witness list review, began further revisions to closing argument. Wed.
4/2/14 3.0

3

Thursday travel time to courthouse. Thurs 4/3/14 .40

0.4

Resume trial notations and present for direct and cross exam; defense preparation. Thurs.
4/3/14 3.0

3

Afternoon session of state's trial in chief, notations of each witness for impeachment. Thurs.
4/3/14 3.5

3.5

Resume trial notations and follow up with co-counsel. Notations for closing argument. Thurs.
4/3/14 1.5

1.5

Defense briefing with experts on their observations for testimony of state's witnesses. Thurs.
4/3/14 1.5

1.5

Travel time from courthouse for Thursday evening session. Thurs. 4/3/14 .40

0.4

Evening trial preparation, reviewed each necessary exhibit; continued with Powerpoint changes
for closing argument. Thurs. 4/3/14 4.0

Friday, no court, defense debriefing with co-counsel and closing argument preparation. Frid.
4/4/14 3.0

3

Reviewed state witness testimony; notations reviewed and closing argument planning. Frid.
4/4/14 4.0

4

Saturday trial preparation; including closing argument preparation and Powerpoint revisions based upon State's witnesses' testimonies. Sat. 4/5/14 3.0

Sunday trial preparation. Sund. 4/6/14

Review of witness statements in anticipation of closing summation. Sund. 4/6/14 1.0

1

Closing argument preparation with continued update on planned Powerpoint presentation. Sund. 4/6/14 2.5

2.5

Travel time to courthouse. Mond. 4/7/14 .40

0.4

Present for state's case in chief, final witnesses for the State with notations done for impeachment purposes. Mond. 4/7/14 3.0

3

Monday afternoon session; final witnesses for the State. Notations done. Mond. 4/7/14 3.5

3.5

Follow up with experts for observations of state's last witnesses, comparison of notes with co-counsel. Mond. 4/7/14 1.5

1.5

Travel time from courthouse for Monday evening session. Mond. 4/7/14 .40

0.4

Conferred with client and discussed trial strategy. Mond. 4/7/14 1.0

1

Went over proposed trial strategy; met with witnesses. Mond. 4/7/14 1.0

1

Notations for closing argument and updates to Powerpoint presentation. Mond. 4/7/14 2.5

2.5

Travel time to courthouse. Tues. 4/8/14 .40

0.4

Tuesday, beginning of defense case in chief; beginning notations. Tues. 4/8/14 3.0

3

Notations done and reviewed during lunch break; prepared for re-direct with updated questions. Tues. 4/8/14 1.0

1

Exhibit sorting with clerk. Tues. 4/8/14 .20

0.2

Debriefed with expert witnesses, observations for direct and re-direct for co-counsel. Tues. 4/8/14 2.5

2.5

Notations done for expert witness Bob Smith. Tues. 4/8/14 1.5

1.5

Follow up assessment of expert witness testimony of Gaylan Warren and Bob Smith; for closing argument. Tues. 4/8/14 1.0

1

Travel time from courthouse for Tuesday evening trial session: Tues. 4/8/14 .40

0.4

Conferred with client in anticipation of direct testimony questioning. Tues. 4/8/14 1.0

1

Conference with co-counsel, follow up questions, and summation of final witnesses before client testimony. Tues. 4/8/14 .5

0.5

Continued with closing argument preparation in anticipation of final summation. Tues. 4/8/14

3.5

3.5

Travel time to courthouse. Wed. 4/9/14 .40

0.4

Arrived with co-counsel, final conference with client before his testimony. Wed. 4/9/14 .5

0.5

Notations for co-counsel on direct examination and follow up with client. Wed. 4/9/14 3.0

3

1.0 Follow up with expert witnesses Warren and Smith; closing argument notations. Wed. 4/9/14

1

Exhibit preparation for closing argument. Wed. 4/9/14 .20

0.2

Present for State's closing argument/summation with notations done; continued with Powerpoint revisions during prosecutor's closing argument. Wed. 4/9/14 1.0

Notations for closing argument done. Wed. 4/9/14 .30

0.3

Defense closing argument. Wed. 4/9/14 1.20

1.2

Resumed closing argument after break. Wed. 4/9/14 .5

0.5

Follow up with client and both expert witnesses upon conclusion of closing argument; debriefing with co-counsel. Wed. 4/9/14 1.0

Return time from courthouse. Wed. 4/9/14 .40

0.4

Travel time to court for verdict. Thurs. 4/10/14 .40

0.4

Conference with client and co-counsel, then present for verdict. Thurs. 4/10/14 1.0

1

Argument for special self-defense finding. Thurs. 4/10/14 .20

0.2

Time allotted waiting for special verdict. Thurs. 4/10/14 2.5

2.5

Present for special verdict. Thurs. 4/10/14 .20

0.2

Follow up with client and final notations for billing. Thurs. 4/10/14 .5
0.5

Returned from courthouse. Thurs. 4/10/14 .40
0.4

Lead counsel Rate: \$300.00 an hour

Total hours: 594.55

Total calculated: \$178,365.00

Gaylan Warren/Columbia Int'l Forensics Lab: \$11,144.84

b \$22,647.84

Robert Smith, SAFE, LLC: \$22,787.50

Teresa Border Law Firm: \$2,412.50

David L. Stevens, Attorney at Law:

\$110,978.00

Additional Per Diem expenses for David Stevens: from August 8, 2013 to August 22, 2013: \$1,100.00

Total funds raised for Gerlach defense expenses: \$8,311.00
minus

\$1,100.00 Per Diem for David Stevens 8/8/13; 8/15/13; 8/22/13
\$1,548.00 flight for Dave Stevens 3/14/14
\$15.00 City of Spokane 6/13/13
\$2.25 Superior Court clerk 5/30/13
\$6.00 Superior Court clerk 6/4/13
\$46.00 Bar Office copies 6/5/13
\$17.00 Spokane County 911 recording 6/6/13
\$7.59 Hays Park post office mailing to expert witness 5/3/14
\$87.00 Fed Ex 11/5/13
\$5.42 Radio Shack exhibit items 9/17/13
\$199.21 Fed Ex exhibits 2/15/14
\$93.57 Staples exhibit items 2/15/14
\$15.00 City of Spokane photo CD 11/7/13
\$15.00 City of Spokane photo CD 6/27/13
\$3.50 Bar copies 6/27/13
\$13.66 Fed Ex items for exhibits 8/7/13
\$45.90 Staples items for exhibits 8/13/13
\$1.50 Superior Court clerk copies 8/13/13
\$238.30 Fed Ex exhibits/pictures 9/23/13
\$475.60 flight for Dave Stevens 10/23/13
\$2.30 parking cost 2/14/14
\$3.30 parking cost 3/5/14
\$3.30 parking cost 3/31/14

\$3.30 parking cost 4/1/14
\$3.30 parking cost 4/2/14
\$3.30 parking cost 4/3/14
\$3.30 parking cost 4/7/14
\$3.30 parking cost 4/8/14
\$3.30 parking cost 4/9/14
\$2.30 parking cost 4/10/14
\$19.00 parking cost 4/13/14
Total: \$3,985.50

Richard Lee Law Office, subtracted from billing: \$178,365.00

- \$4,325.50 14.42 hours at \$300.00 an hour

Balance: \$174,039.50

State v. Gail H. Gerlach, Spokane County Superior Court No. 13-1-01907-9

David L. Stevens billing

Description

Hours at \$200 an hour

Hours at \$300 an hour

5/30/2013 Discussed case via email with Richard Lee agreed to be co-counsel with contract to be signed when I get to Spokane
0.45

05/30/13 Reviewed lesser included offenses and sentencing guidelines for lesser included.
2

05/31/13 Discussed with Richard Lee via email prosecutor.
0.5

06/08/13 Reviewed documents from Richard Lee regarding charging. Researched statutes and caselaw regarding manslaughter.
2

06/09/13 Reviewed of law enforcement reports.
5

06/13/12 Reviewed police report request from Richard Lee.
0.5

06/17/13 Reviewed police reports 6/17/2013
6

06/18/13 Reviewed photos of scene and emailed co-counsel.
4

06/18/13 Conference with co-counsel, and reviewed photographs.
4

06/18/13 Conference working out details on expert witness.
3

06/20/13 Conferred with Gail Gerlach and discussed investigation of case.
0.75

06/22/13 Notes for further investigation and questions for Gail Gerlach.
3

- 06/23/13 Studied each investigative report and noted questions for follow up.
4
- 06/26/13 Discussed scheduling with Richard Lee.
0.3
- 06/27/13 Conference with client and Richard Lee.
2.5
- 06/27/13 Reviewed and replied to email from co-counsel regarding DPA's forwarding Twitter comments from client.
0.4
- 06/29/13 Researched 404(b) and use of Twitter posts in trial: foundation.
1.7
- 07/02/13 Reviewed and made notes as to police reports.
2
- 07/07/13 Reviewed Sharon Gerlach's interview with police.
2.5
- 07/16/13 Reviewed email from expert Gaylan Warren and responded.
0.25
- 07/16/13 Reviewed C.V. of Gaylan Warren, expert.
0.5
- 07/16/13 Researched caselaw on reconstruction experts: foundation.
1
- 07/16/13 Discussed case with Richard Lee.
0.25
- 07/16/13 Researched use of force experts caselaw.
3
- 07/16/13 Reviewed and commented on follow up message to prosecutor.
1
- 07/18/13 Conferred with Gail Gerlach and co-counsel.
0.25
- 07/20/13 Discussed pre-assignment with co-counsel.
0.45

08/07/13	Travel from Sacramento to Spokane.	4
08/07/13	Drafted agreed order on preassignment and emailed to co-counsel and DPA.	2
08/07/13	Reviewed police reports for interviews.	4.7
08/08/13	Travel Time to Holy Family Hospital to interview witness.	0.75
08/08/13	Interview of Dr. Sally Aiken.	0.75
08/08/13	Finalized notes from interview of Dr. Sally Aiken.	1
08/08/13	Follow up with prosecutor; finalizing notations; discussion of case.	0.5
08/08/13	Researched trial motions.	0.75
08/08/13	Drafting Motions and declaration, order.	1.5
08/09/13	Travel time to interview.	0.4
08/09/13	Interview with Officers Honiker and House.	0.4
08/09/13	Travel time from interview.	2
08/09/13	Discussion of case and summaries and formating motions.	0.4
08/12/13	Travel time to interview.	0.4
08/12/13	Preparation for interview.	0.4

08/12/13 Interview of Ofc. Cordis.
0.4

08/12/13 Return from interview travel time.
2.6

08/12/13 Interview and updated status of case with Mr. Gerlach.
0.4

08/13/13 Conference on case and reviewed witnesses' reports.
2

08/13/13 Conducted interview with Det. Cestnik.
2

08/13/13 Reviewed motions for filing.
1.5

08/13/13 Interview of Det. Cestnik.
0.3

08/13/13 Follow up with expert Gaylan Warren.
0.3

08/13/13 Travel time from courthouse.
1

08/13/13 Talked to Gail Gerlach.
0.4

08/14/13 Travel time to meet with Ofc. B. Aitken.
0.5

08/14/13 Interview with Ofc. B. Aitken.
0.4

08/14/13 Conference with co-counsel and advisory counsel on self-defense.
0.3

08/14/13 Travel time to prosecutor's office.
2

08/14/13 Interview with Officer K. Applewhaite and Det. B. Estes.
0.3

08/14/13 Follow up with prosecutor on CrR 3.6/3.5 motion and scheduling. 2.7

08/14/13 Discussion of case with co-counsel and meeting with client Gail Gerlach. 0.1

08/19/13 Conference with Richard Lee. 1

09/02/13 Researched officers submitting to recording of interviews. 1.3

09/06/13 Researched eliciting opinions of experts on police investigations. 1.6

09/13/13 Reviewed CV of Robert Smith, expert. 0.5

08/14/13 Reviewed website of Robert Smith regarding expertise. 0.3

09/14/13 Reviewed email regarding expert Robert Smith and responded. 0.3

09/14/13 Set up online DropBox for photos and documents. 0.3

09/15/13 Researched contesting lesser included offenses. 2

09/22/13 Travel from Spokane back to Sacramento. 4.15

09/24/13 Finished draft of 3.5 motion and brief. 6

09/24/13 Edited motion to compel. 2.5

09/24/13 Reviewed comments of expert Robert Smith and articles on self-defense. 2

09/24/13 Travel from Sacramento to Spokane. 6

10/02/13 Present with two expert witnesses for their examination of vehicle. 2.5

10/02/13 Follow up with expert witnesses Warren and Smith. 1

10/02/13 Follow up with co-counsel, prepared for interview with State's witness Det. Gallion. 0.1

10/02/13 Travel time to Public Safety Building. 0.5

10/02/13 Conferred with expert witnesses. 0.4

10/02/13 Interview with Det. Gallion. 0.1

10/02/13 Travel time return. 1.5

10/04/13 Reviewed email to prosecutor again asking for Dr. Aiken's notes. 0.2

10/03/13 Reviewed Jury Instructions. Made notations on use of instructions for close. 1.5

10/05/13 Travel from Spokane back to Sacramento. 3

10/06/13 Research and drafting of motions in limine. 4

10/11/13 Reviewed spousal privilege in WA State. 2.3

10/16/13 Reviewed email from prosecutor regarding diagrams and CrashZone program.
Forwarded to expert. 0.2

10/18/13 Reviewed video on semiautomatic pistol cartridge ejection sent by Robert Smith. 0.3

- 10/18/13 Reviewed email from prosecutor regarding Dr. Aiken's notes.
0.2
- 10/20/13 Made notes of questions based on interviews of State's witnesses. Reviewed tape-recorded interviews of officers.
3
- 10/22/13 Preparation for suppression, 3.5, hearing.
2
- 10/24/13 Discussed case and status of hearings with Richard Lee.
0.1
- 10/24/13 Reviewed brief prosecutor filed in response to 3.5 hearing; research caselaw as to custodial interrogation.
3
- 10/25/13 Reviewed email response from prosecutor regarding witness interviews.
0.1
- 10/25/13 Reviewed articles provided by Robert Smith regarding shooting dynamics.
2
- 10/25/13 Reviewed prosecutor's response to motion to compel. Legal research checking prosecutor's cites.
2
- 10/25/13 Travel to court.
0.3
- 10/25/13 3.5 suppression hearing.
2
- 10/25/13 Return from court. Travel time.
0.3
- 10/29/13 Reviewed notes on self-defense from Robert Smith.
1
- 11/04/13 Reviewed email to prosecutor discussing viewing physical evidence.
0.1

12/10/13 Researched stitulations to evidence as trial strategy.
2.2

12/14/14 Researched ER 405.
6.4

01/03/14 Conference with Richard Lee.
0.2

01/04/14 Conference with Richard Lee.
0.1

01/06/14 Reviewed supplemental brief to compel discovery. Research on compelling officers' field
notes.
4.2

01/07/14 Redrafted and edited supplemental brief to compel discovery.
2.7

01/15/14 Reviewed prosecutor's response to motion to compel field notes/quash subpoenas.
Researched caselaw.
2.5

01/16/14 Reviewed information on Springfield pistols XD.
0.5

01/23/14 Discussed by email with Richard Lee viewing of evidence.
0.2

01/28/14 Reviewed prosecutor's supplemental resonse to 3.5 hearing. Checked cites for negative
treatment.
4.1

01/30/14 Reviewed Richard Lee's response to prosecutor's supplemental response.
1

02/06/14 Reviewed photos to be used as exhibits for trial. Made notes.
4.5

02/07/14 Reviewed offer by prosecutor to resolve case with Man 2 and no firearm enhancement
and agreed exceptional downward recommendation.
1

02/07/14 Researched agreed exceptional downward sentences.
0.4

02/07/14	Discussed offer with Richard Lee. 0.5
02/08/14	Further discussions with Richard Lee regarding prosecutor's offer. 0.5
02/10/14	Additional discussions with Richard Lee regarding offer. 1
02/14/14	Discussed status with Richard Lee. 0.5
02/15/14	Reviewed Lee's letter to opposing counsel; suggested changes. 0.2
02/14/14	Discussed prevailing on 3.5 motion with Richard Lee. 1
02/16/14	Researched defendant's suppressed statements coming in as impeachment. 2.7
02/17/14	Reviewed findings of fact and redrafted same. 3
02/17/14	Reviewed Lee's letter to civil counsel. 0.3
02/18/14	Discussed status with Richard Lee. 0.2
02/17/14	Reviewed filings on spousal privilege and autopsy results/legal research. 1
02/18/14	Discussed presentment order with Richard Lee. 0.3
02/18/14	Follow up with Richard. Discussed viewing crime scene. 0.3
02/19/14 draft JTMR.	Discussed Joint Trial Management Report and conferred with Richard Lee and reviewed 1

02/19/14 Discussed subpoenas to be issued for trial, voir dire, and public records request for mug shot of deceased.
0.5

02/20/14 Via email, discussed jury instructions with Richard Lee.
0.5

02/21/14 Reviewed letter to client confirming rejection of prosecutor's offer.
0.5

02/21/14 Discussed status of case with Richard Lee and prosecutor's offer to settle case.
0.5

02/24/14 Reviewed email from prosecutor regarding offer to settle.
0.3

02/25/14 Discussed status of case with Richard Lee and prosecutor's offer.
0.1

02/01/14 Conference with Richard Lee.
0.5

02/26/14 Reviewed amended Joint Management Report. Redrafted same.
2

02/26/14 Reviewed letter from police department refusing to release deceased mug shots without deceased's permission.
0.3

02/01/14 Reviewed notes on client's possible testimony from Richard Lee.
0.5

02/26/14 Discussed status with Richard Lee and prosecutor's offer to settle.
0.5

02/27/14 Went over filings with Richard Lee.
0.3

02/27/14 Reviewed draft closing statement PowerPoint from Richard Lee.
2

02/27/14 Conferred with Richard Lee by phone regarding PowerPoint closing statement. 0.2

02/27/14 Discussed status of prepping for trial with Richard Lee. 0.15

02/28/14 Conference with Richard Lee on Opening Statement PowerPoint. 0.3

03/02/14 Reviewed prosecutor's filed motion for reconsideration of 3.5 ruling. Researched DPA's citations. 3

03/03/14 Via email, discussed prosecutor's motion for reconsideration with Richard Lee. 0.2

03/03/14 Researched jury questionnaires and drafted same. 0.3

03/03/14 Reviewed prosecutor's proposed 3.5 findings. 1

03/04/14 Reviewed prosecutor's Criminal Joint Management Report. 1

03/05/14 Reviewed prosecutor's Combined Criminal Joint Management Report. 0.5

03/05/14 Reviewed Findings of Fact and Conclusions of Law signed by judge. 0.3

03/06/14 Reviewed prosecutor's witness list. 0.2

03/06/14 Via email, discussed filing objections to FFCL for possible appeal purposes. 0.3

03/10/14 Reviewed email from expert Robert Smith regarding trial. 0.2

- 03/10/14 Via email, discussed statutes on justifiable homicide with Richard Lee.
0.3
- 03/14/14 Discussed jury questionnaire via email with Richard Lee.
0.1
- 03/14/14 Discussed expert testimony with Richard Lee.
0.3
- 03/15/14 Travel from Pristina, Kosovo (Europe) to Spokane Washington (US). Actually, 27 hours
but slept 7 hours.
20
- 03/17/14 Reviewed voir dire questions on self defense sent by Richard Lee.
2
- 03/19/14 Via email, discussed with Richard Lee prosecutor's possible cross examination question
of Gail Gerlach.
0.5
- 03/20/14 Reviewed prosecutor's filed Trial Memorandum/researched cases cited.
5
- 03/21/14 Conferred with Richard Lee on case. Discussed prosecutor's Trial Memorandum.
0.5
- 03/21/14 Via email, discussed with Richard Lee subpoena duces tecum to get deceased's mug shot
photos.
0.3
- 03/23/14 Reviewed 911 tape. Made notations and drafted transcript of call for trial.
2
- 03/23/14 Reviewed Richard Lee's notes on interviews of prosecutor's witnesses.
0.7
- 03/23/14 Via email discussed qualifications with Robert Smith.
0.5

03/23/14 Conferred with Richard Lee on case.
1.5

03/23/14 Drafted response to prosecutor's Trial Memorandum/Motions in Limine:
7

03/24/14 Discussed trial strategy with Richard Lee.
2

03/25/14 Discussed case with Teresa Border, associate counsel.
0.5

03/26/14 Edited and filed response to prosecutor's Trial Memorandum/Motions in Limine.
4

03/26/14 Reviewed email from prosecutor complaining about response to Trial Memorandum.
0.1

03/26/14 Reviewed new motion in limine from prosecutor to exclude expert Robert Smith from
testifying/legal research.
4

03/26/14 Contacted Robert Smith and discussed prosecutor's new motion.
0.5

03/27/14 Began drafting response to new motion in limine.
7

03/27/14 Reviewed email from prosecutor agreeing to scene view by jury.
0.1

03/27/14 Reviewed approximately 70 megabytes of materials that the prosecutor requested from
Robert Smith.
3

03/28/14 Reviewed prosecutor's exhibit log email.
0.2

03/28/14 Reviewed emailed edits of proposed voir dire by associate counsel Teresa Border.
0.4

03/28/14	Hearing of prosecutor's new motion in limin travel time returned.	0.5
03/29/14	Prepared trial binder.	2
03/29/14	Witness prep with expert witness Robert Smith.	2.25
03/29/14	Discussed closing summation wither Richard Lee. Reviewed PowerPoint for opening and close.	2
03/29/14	Witness prep with Robert Smith for trial.	2.5
03/30/14	Reviewed transcript of 911 call emailed by prosecutor.	0.2
03/30/14	Discussed incorporating 911 call transcript into PowerPoint with co-counsel.	0.5

Total Hours 281.2 total cost \$56,240.00

03/31/14	Morning trial preparation. Reviewed notes for voir dire.	3.3	\$300
03/31/14	Travel time to court. Tues. 4/1/14 .40	0.4	
03/31/14	Jury selection.	2.5	
03/31/14	Lunch break. Discussed case with experts, co-counsel, and client.		1
03/31/14	Resumed jury selection.	3.5	

03/31/14	Follow up with expert witnesses; planning opening statement with client and Richard Lee.	0.5	
03/31/14	Travel time from court.	0.4	
03/31/14	Reviewed police reports and voir dire notes.		6
04/01/14	Morning trial preparation. Reviewed notes for voir dire. Trial preparation.	3.1	
04/01/14	Travel time to court.	0.4	
04/01/14	Jury preparation. Discussed case with co-counsel.		3.5
04/01/14	Final review over jury selection questionnaire; present with client and co-counsel into afternoon session.	5.5	
04/01/14	Followed up with both expert witnesses and discussed case.		1.5
04/01/14	Travel time from court.	0.4	
04/01/14	Tuesday evening session. Reviewed qualifying expert and Richard Lee's opening statement.	8.1	
04/02/14	Morning trial preparation. Reviewed opening and impeachment notes.		3
04/02/14	Wednesday travel time to court.	0.4	
04/02/14	State's opening statement.	0.5	

04/02/14	Defense opening statement presentation with follow up notations for cross examination.	0.5	
04/02/14	Notations done for case in chief in anticipation of defense case in chief, cross-examination.	3	
04/02/14	Discussed status of witness preparation with Gail Gerlach.		0.4
04/02/14	Afternoon session; present for State's case; cross examination; conference.		
		3.5	
04/02/14	Return time from court.	0.4	
04/02/14	Went over exhibits with co-counsel.		1.5
04/02/14	Evening trial preparation.	9.2	
04/03/14	Morning trial preparation.	2.7	
04/03/14	Thursday travel time to courthouse.		0.4
04/03/14	Resumed trial. State's case in chief.	3	
04/03/14	Afternoon session of state's trial in chief, notations of each witness for impeachment.		
		3.5	
04/03/14	Resume trial notations and follow up with co-counsel. Notations for closing argument.		
		1.5	
04/03/14	Defense briefing with experts on their observations for testimony of state's witnesses.		
		1.5	

04/03/14	Travel time from courthouse.	0.4
04/03/14	Evening trial preparation. Went over foundation questions. Exhibits. Witness testimony. Police reports. Jury instructions.	7
04/04/14	Friday morning, no court, defense debriefing with co-counsel and closing argument preparation.	14.4
04/04/14	Friday evening. Reviewed witness testimony. Prepared for direct testimony of defense witnesses.	4
04/05/14	Saturday trial preparation. Various. Added notes from State's case in chief to prepare direct questions for defense witnesses.	13.2
04/06/14	Sunday trial preparation. Went over photos, exhibits, prosecutor's opening statements, and witness testimony.	7.3
04/06/14	Went over expert witness questions.	1.7
04/06/14	Closing argument preparation with continued update on planned Powerpoint presentation.	2.5
04/07/14	Morning trial preparation. Reviewed notes. Went over trial strategy to determine if all concessions were on record.	2.1
04/07/14	Travel time to courthouse.	0.4
04/07/14	State's case in chief concludes.	3
04/07/14	Monday afternoon session.	3.5
04/07/14	Follow up with experts for observations of state's last witnesses, comparison of notes with co-counsel.	1.5

04/07/14	Travel time from courthouse for Monday evening session.		0.4
04/07/14	Conferred with client and discussed trial strategy.		1
04/07/14	Went over proposed trial strategy. Met with witnesses.		1
04/07/14	Went over PowerPoint with co-counsel.	2.5	
04/08/14	Morning trial preparation.	2	
04/08/14	Travel time to courthouse.	0.4	
04/08/14	Tuesday, beginning of defense case in chief.		3
04/08/14	Went over redirect and conferred with co-counsel.		1
04/08/14	Exhibit sorting with clerk.	0.2	
04/08/14	Debriefed with expert witnesses, observations for direct and re-direct for co-counsel.		
		2.5	
04/08/14	Notations done for expert witness Bob Smith.		1.5
04/08/14	Went over rebuttal testimony with expert witnesses.		2.2
04/08/14	Travel time from courthouse for Tuesday evening trial session.		0.4
04/08/14	Witness preparation and cross examination with Gail Gerlach.		1
04/08/14	Conference with co-counsel, follow up questions, and summation of final witnesses before client testimony.	0.5	

04/08/14	Trial preparation. Went over witness testimony.	4.2
04/09/14	Morning trial preparation. Went over strategy for closing argument incorporating prosecutor's opening statement.	1.7
04/09/14	Travel time to courthouse.	0.4
04/09/14	Arrived with co-counsel, final conference with Gail Gerlach before his testimony.	0.5
04/09/14	Notations for co-counsel on direct examination and follow up with client.	3
04/09/14	Follow up with expert witnesses Warren and Smith; closing argument notations.	1
04/09/14	Went over use of exhibits with co-counsel.	0.2
04/09/14	Present for State's closing argument. Notations for closing argument.	2
04/09/14	Notations for closing argument done.	0.3
04/09/14	Defense closing argument.	1.2
04/09/14	Present for closing argument after break.	0.5
04/09/14	Follow up with client and both expert witnesses upon conclusion of closing argument; debriefing with co-counsel.	1
04/09/14	Return time from courthouse.	0.4

04/10/14	Travel time to court for verdict.	0.4	
04/10/14	Conference with client and co-counsel, then present for verdict.		1
04/10/14	Argument for special self-defense finding.	0.2	
04/10/14	Time allotted waiting for special verdict.	2.5	
04/10/14	Present for special verdict.	0.2	
04/10/14	Follow up with client and final notations for billing.		0.5
04/10/14	Returned from courthouse.	0.4	

Total trial hours 177.3 total cost \$53,190.00

Total at \$200 an hour: \$56,240.00

Total at \$300 an hour: \$53,190.00

Cost of plane ticket: \$1,548.00

Total Billing: \$110,978.00


BORDER LAW FIRM

Criminal Defense, Family Law

Teresa L. Border, P.S.

Sent via email:

Monday, April 14, 2014

Attn: David Stevens

RE: State v. Gerlach Attorney Fees

Dear David,

Here are the dates and hours worked on the Gerlach case:

DATE	TIME	WORK
3-21-14	2.50	Review and Assist R. Lee-Closing
3-21-14	.50	Review and Edit-Voir Dire
3-21-14	.10	T. Call- R. Lee
3-25-14	.30	Review Trial Memo
3-25-14	.50	Meet/Discuss case with RL and DS
3-26-14	.50	Review defense Trial Memo
3-27-14	.50	Review and Edit-Voir Dire
3-28-14	.75	Review Police Reports
3-31-14	.50	Review Response- Motion in Limine
3-31-14	1.50	Court
4-1-14	1.75	Court
4-7-14	.25	Review Response-2 nd Motion in Limine

I worked a total of 9.65 hours on the case. My normal hourly rate is \$250. Total fees would be \$2412.50 at that rate. Let me know if anything further is needed.

Sincerely,

Teresa L. Border
 Attorney at Law
 WSBA #19222
 (509) 599-2676

 827 W. 1st Avenue, Suite 306 Spokane, Washington 99201 Phone (509) 599-2676

PROSECUTING ATTORNEY DISCOVERY UNIT

YOUR RECEIPT
THANK YOU

06-27-13

14 @
0.25 @
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*3.5000

000-7934
* 1-19

YOUR RECEIPT
THANK YOU

06-05-13

184 @
0.25 @
02 *46.00

*46.0000

000-7761
* 1-57

XFINITY Connect

lawyerattomey@comcast.net

± Font Size -

FW: eTicket Itinerary and Receipt for Confirmation F8NFR4

From : David Stevens <[REDACTED]>
Subject : FW: eTicket Itinerary and Receipt for Confirmation F8NFR4
To : Richard Lee <[REDACTED]>

Sat, Apr 26, 2014 03:31 PM

----- Forwarded Message -----

From: "United Airlines, Inc." <unitedairlines@united.com>
To: [REDACTED]
Sent: Thursday, March 13, 2014 8:22 PM
Subject: eTicket Itinerary and Receipt for Confirmation F8NFR4

Confirmation:
F8NFR4
Check-In >

Issue Date: March 14, 2014

Traveler	eTicket Number	Frequent Flyer	Seats
STEVENS PEREZ/DAVID LMR	0162400805785		--/--/--/--

FLIGHT INFORMATION

Day, Date	Flight	Class	Departure City and Time	Arrival City and Time	Aircraft	Meal
Fri, 14MAR14	OS93	W	VIENNA, AUSTRIA (VIE) 10:25 AM	WASHINGTON, DC (IAD - DULLES) 3:35 PM	767-300	
Flight operated by TYROLEAN AIRLINES FOR LUFTHANSA.						
Fri, 14MAR14	UA1578	W	WASHINGTON, DC (IAD - DULLES) 5:25 PM	SPOKANE, WA (GEG) 11:39 PM	757-300	Purchase
Sat, 29MAR14	UA195	S	SPOKANE, WA (GEG) 6:00 AM	DENVER, CO (DEN) 9:12 AM	737-900	Purchase
Sat, 29MAR14	UA8879	S	DENVER, CO (DEN) 6:30 PM	FRANKFURT, GERMANY (FRA) 11:55 AM (30MAR)	747-400	
Flight operated by LUFTHANSA. If this is an originating flight on your itinerary, please check in at the LUFTHANSA ticket counter.						
Mon, 31MAR14	JP115	S	FRANKFURT, GERMANY (FRA) 9:30 AM	PRISTINA YU (PRN) 11:45 AM	A-319	Snack
Flight operated by ADRIA AIRWAYS.						

FARE INFORMATION

Fare Breakdown

Airfare:	662.00EUR
Equivalent Airfare:	919.00USD
U.S. Federal Transportation Tax:	35.00
September 11th Security Fee:	7.50
International Surcharge:	426.10
International Surcharge (YR):	1.40
U.S. Customs User Fee:	5.50
U.S. Immigration User Fee:	7.00

Form of Payment:

VISA
Last Four Digits 7386

U.S. APHIS User Fee:	5.00
Austria Passenger Security Charge:	10.70
Austria Air Transport Levy Domestic:	48.60
Austrian Airport Passenger Service Charge:	25.10
Germany Airport Security Charge:	9.10
Germany Air Transportation Tax:	10.40
Germany Passenger Service Charge:	28.60
U.S. Passenger Facility Charge:	9.00
Per Person Total:	1,548.00USD
eTicket Total:	1,548.00USD

The airfare you paid on this itinerary totals: 919.00 USD

The taxes, fees, and surcharges paid total: 629.00 USD

Fare Rules: Additional charges may apply for changes in addition to any fare rules listed.

NONREF/FL/CHG RESTRICTED

Baggage allowance and charges for this itinerary.

Baggage fees are per traveler

In compliance with U.S. Department of Transportation regulations, checked baggage policies for your entire itinerary are determined by Austrian Airlines. Visit united.com/baggage for more information.

Origin and destination for checked baggage	1 st bag	2 nd bag	Max wt. / dim per piece
3/14/2014 Vienna, Austria (VIE) to Spokane, WA (GEG)	0.00 USD	104.00 USD	50.0lbs (23.0kg) - 62.0in (158.0cm)
3/29/2014 Spokane, WA (GEG) to Frankfurt, Germany (FRA)	0.00 USD	100.00 USD	50.0lbs (23.0kg) - 62.0in (157.0cm)
3/31/2014 Frankfurt, Germany (FRA) to Pristina YU (PRN)	0.00 USD	104.00 USD	50.0lbs (23.0kg) - 62.0in (158.0cm)

Additional Baggage Information

Carry-on baggage information

United accepts one carry-on item with maximum dimensions of 9"x14"x22" (22 cm + 35 cm + 56 cm) in the aircraft cabin, along with one personal item such as a laptop bag with maximum dimensions of 9"x10"x17" (22 cm + 25 cm + 43 cm).

Due to FAA regulations, operating carriers may have different carry-on requirements.

Please check with the operating carrier for more information or go to united.com.

General Baggage Information

First and second bag service charges do not apply to active-duty members of the U.S. military and their accompanying dependents. For additional information regarding baggage charges

allowances, weight/size restrictions, exceptions or embargoes, or charges for overweight, oversized, excess, odd-sized baggage, special items

or sporting equipment, visit united.com/baggage.

International eTicket Reminders

Check-in Requirement - Bags must be checked and boarding passes obtained at least 60 minutes prior to scheduled departure. Baggage will not be accepted and advance seat assignments may be canceled if this condition is not met.

Boarding Requirement - Passengers must be prepared to board at the departure gate with their boarding pass at least 30 minutes prior to scheduled departure.

Failure to meet the **Boarding Requirements** may result in cancellation of reservations, denied boarding, removal of checked baggage from the aircraft and loss of eligibility for denied boarding compensation.

Bring this eTicket Receipt along with photo identification, proof of citizenship, passport and/or visa to the ticket lobby for check-in.

City of Spokane Receipt

Receipt Number: 758772



Spokane Police Department

Spokane, WA 99260

Phone: (509) 625-4030

Fax: (509) 625-4059

<http://www.spokanepolice.org>

Site Information:

Parcel #:

Address:

Permit #: S1308136MISC

Date Issued: 06/13/2013

Permit Type:

Parent Permit:

Processed By: WSA

Applicant:

RICHARD LEE

RICHARD LEE

SPOKANE, WA

Description of Work:

CD

Payee:

Photo CD

1

0

\$15.00

Total Fees:

\$15.00

Payments:

Payment Comments:

Date Paid:
06/13/2013

Cashier:
WSA

Ref #:

Amount:
\$15.00

Cash

Estimated Balance Due:

\$0.00

This Is Not A Permit

Gerlach

z

SPOKANE SUPERIOR COURT
SPOKANE WA
THOMAS R FALLEQUIST
SPOKANE COUNTY CLERK

Rcpt. Date: 05/30/2013
Acct. Date: 05/30/2013
Receipt #: 2013-02-05934
Cashier ID: MEM
Time: 11:51 AM

Item	Case Number	Amount
01	- - -	\$2.25
1505: Fee-Copies		
mbk		
Total Due:		\$2.25
Cash Tendered:		\$2.25
Change Due:		\$0.00

Paid By: CASH, PAYER UNKNOWN

*Gerlach
Case*

z

SPOKANE SUPERIOR COURT
SPOKANE WA
THOMAS R FALLOUJIST
SPOKANE COUNTY CLERK

Rcpt. Date: 06/04/2013
Acct. Date: 06/04/2013
Receipt #: 2013-03-08657
Cashier ID: MEN
Time: 02:54 PM

Item	Case Number	Amount
01	- - -	\$334.00
1505: Fee-Copies emh		
Total Due:		\$334.00
Cash Tendered:		\$340.00
Change Due:		\$6.00

Paid By: CASH, PAYER UNKNOWN

YOUR RECEIPT

THANK YOU

06-05-13

184 Q
0.25 @
02 46.00

46.00

000-7761

* 1-57

SPOKANE COUNTY

Received From: RICHARD LEE

Receipt No. 294586

Address: _____

Date: 6-6-13

Acct. No.: _____

Cash:

Amount Paid: 17.-

Amt. of Acct: _____

Money Order:

Sales Tax: _____

Amt. Paid _____

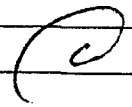
Check: Check # _____

Total Paid 17.-

Balance Due: _____

Credit Card: Exp. Date: _____

Purpose: 911 RECORDING (13-93763)

Received by: 

HAYS PARK STATION
SPOKANE, Washington
992079998
5480520027-0097

05/03/2014 (800)275-8777 11:21:32 AM

=====
Sales Receipt
=====

Product Description	Sale Qty	Unit Price	Final Price
Bubble Mailer 8.5" x 12"	1	\$1.79	\$1.79
@@ ~ NEWPORT WA 99156-9363 \$5.80			
Zone-1			
Priority Mail 1-Day By Weight			
1 lb. 1.90 oz.			
Expected Delivery: Mon 05/05/14			
USPS Tracking #:			
9114901230801792954021			
Includes \$50 insurance			

Issue PVI: =====
\$5.80

Total: =====
\$7.59

Paid by:
Debit Card \$7.59
Account #: XXXXXXXXXXXX
Approval #: 812808
Transaction #: 39
23903550051
Receipt#: 005418

@@ For tracking or inquiries go to
USPS.com or call 1-800-222-1811.

~~ Save this receipt as evidence of
insurance. For information on filing
an insurance claim go to
usps.com/ship/file-domestic-claims.htm

Order stamps at usps.com/shop or
call 1-800-Stamp24. Go to
usps.com/clicknship to print
shipping labels with postage. For
other information call
1-800-ASK-USPS.

Get your mail when and where you
want it with a secure Post Office
Box. Sign up for a box online at
usps.com/poboxes.

Bill#:1000302422331
Clerk:05



7116 N Division St
Spokane, WA 99208-6524
Tel: (509) 484-2579

11/5/2013 8:59:30 PM PST
Trans.: 6377 Branch: 2894
Register: 004 T111:01145156
Team Member: Joshua C.
Customer: Richard Lee

DEPOSIT ON ORDER



* 2 8 9 4 0 0 4 6 3 7 7 *

Order Number: 28940144J
Order Due Date: 11/08/2013

Sub-Total	86.95
Total	86.95
Deposit Paid	86.95
Estimated Tax	6.96

(Tax will be recalculated at the applicable rate at time of tender.)

Balance Due 0.00

Cash	87.00
Total Tender	87.00
Change Due	(0.05)



* 2 8 9 4 0 0 4 6 3 7 7 *

All jobs produced for customers will be retained for 30 days after the order due date reflected on this receipt. FedEx Office is not responsible for retaining any work not picked up by customer after such 30 day period and is entitled to collect and retain any deposits or other payment for all work performed on customer's behalf.

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Customer Copy

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RADIOSHACK
NORTHPOINT PLAZA
9656 N NEWPORT HWY #5A
SPOKANE, WA 99218-1221
(509) 468-4273

Last Valid Day for Return is 10/17/2013,
see back of receipt for full return policy

2603017 \$4.99
5-PACK CDR COOL COLORS PUCK

SubTotal \$4.99
Tax 8.70% \$0.43
TOTAL \$5.42

Debit \$5.42
CHANGE \$0.00

Total Items Sold: 1

Card number: *****
Auth #: 019879
Gateway# 326077812321
Date/Time: 09/17 13:09

E-Cycle Washington: Free recycling of
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For recycling locations, call
1-800-RECYCLE.
www.ecyclewashington.org

Store: 013766 Register: 01 Tran: 1040
Operator: KDB Sales Associate: KDB
Ticket #: 011040 9/17/2013 1:09:25 PM



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receipt are required for all refunds.
Sales and returns are subject to the terms
and conditions identified on the back.

Shop online 24/7 at
<http://www.radioshack.com>

* Tell us about your *
* shopping experience! *
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7116 N Division St
Spokane, WA 99208-6524
Tel: (509) 484-2679

2/15/2014 2:56:45 PM PST
Team Member: Joshua C.

SALE

CLR 1S CvrGloss	123 @	1.4900 T
002509 Reg. Price	1.49	
Regular Total	183.27	
Discounts	0.00	
Total	183.27	

Sub-Total	183.27
Tax	15.94
Deposit	0.00
Total	199.21
Visa (S)	199.21
Account: [REDACTED]	
Auth: 015653 (A)	
Total Tender	199.21
Change Due	0.00

Total Discounts 0.00



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fedex.com/welisten or 1-800-398-0242
Offer Code: _____ Offer expires 3/31/14



Low prices. Every item. Every day.

9960 N. NEWPORT HWY.

SPOKANE, WA 99218

(509) 466-8989

SALE 1508473 2 004 21311
0486 02/15/14 01:58

QTY SKU PRICE

REWARDS NUMBER 3982921730

1	MULTI PAGE SHEET P 713103089968	6.79
1	HEAVY DUTY VIEW BN 077711796959	8.99
1	STAPLES 8-TAB INSE 713103060325	6.29
1	MULTI PAGE SHEET P 713103089968	6.79
1	HEAVY DUTY VIEW BN 077711796959	8.99
1	STAPLES 8-TAB INSE 713103060325	6.29
1	MULTI PAGE SHEET P 713103089968	6.79
1	HEAVY DUTY VIEW BN 077711796959	8.99
1	STAPLES 8-TAB INSE 713103060325	6.29
1	MULTI PAGE SHEET P 713103089968	6.79
1	MULTI PAGE SHEET P 713103089968	6.79
1	STAPLES 8-TAB INSE 713103060325	6.29

SUBTOTAL 86.08

Standard Tax 8.70% 7.49

TOTAL \$93.57

Visa 93.57

Card No.: XXXXXXXXXXXX [S]

Auth No.: 015630

TOTAL ITEMS 12

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1-800-Recycle

City of Spokane Receipt

Receipt Number: 769437



Spokane Police Department
Spokane, WA 99260
Phone: (509) 625-4030
Fax: (509) 625-4059
<http://www.spokanepolice.org>

Site Information:		Date Issued:	11/07/2013
Parcel #:		Permit Type:	
Address:		Parent Permit:	
Permit #:	S1313252MISC	Processed By:	KMJ

Applicant:

RICHARD LEE
RICHARD LEE
SPOKANE, WA

Description of Work:

13-93763 PHOTOS

Payee:

Photo CD	1	0	\$15.00
Total Fees:			\$15.00

Payments:	Payment Comments:	Date Paid:	Cashier:	Ref #:	Amount:
Cash		11/07/2013	KMJ		\$15.00

Estimated Balance Due: \$0.00

This Is Not A Permit

City of Spokane Receipt

Receipt Number: 759867



Spokane Police Department

Spokane, WA 99260

Phone: (509) 625-4030

Fax: (509) 625-4059

<http://www.spokanepolice.org>

Site Information:	Date Issued:	06/27/2013
Parcel #:	Permit Type:	
Address:	Parent Permit:	
Permit #: S1308692MISC	Processed By:	TTE

Applicant:

RICHARD LEE
RICHARD LEE
SPOKANE, WA

Description of Work:

DVD

Payee:

Photo CD	1	0	\$15.00
----------	---	---	---------

Total Fees:			\$15.00
--------------------	--	--	---------

Payments:	Payment Comments:	Date Paid:	Cashier:	Ref #:	Amount:
Cash		06/27/2013	TTE		\$15.00

Estimated Balance Due:	\$0.00
-------------------------------	--------

This Is Not A Permit

YOUR RECEIPT

THANK YOU

06-27-13

14 Q
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02 *3.50

*3.50

000-7934
* 1-19



FedEx Office is your destination
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7116 N Division St
Spokane, WA 99208-6524
Tel: (509) 484-2679

8/7/2013 11:54:25 AM PST
Team Member: Dianne C.

SALE

HiLitr Hi-Liter 2Ylw	1 @	1.7900 T
006447 Reg. Price	1.79	
Post-it Flag 4Primry	1 @	5.3900 T
004145 Reg. Price	5.39	
Post-it Flag 4Primry	1 @	5.3900 T
004145 Reg. Price	5.39	
Regular Total	12.57	
Discounts	0.00	
Total	12.57	

Sub-Total	12.57
Tax	1.09
Deposit	0.00
Total	13.66
Cash	13.66
Total Tender	13.66
Change Due	0.00

Total Discounts 0.00



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\$5 off your next \$25 print project
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2624 North Division Rd
Spokane, WA 99207
(509) 328-6495

SALE 1660608 5 009 77271
0635 08/13/13 10:43
QTY SKU PRICE

REWARDS NUMBER 3684577723

1	STPLS PERF PAD LGL 718103021418	14.29
1	FEBREEZE AIR EFFCT 037000166290	4.99
1	PAPERMATE PROFILE 041540894711	2.00
1	STAPLES 8-TAB WRIT 718103060264	7.79
1	NESTLE PURE LIFE 068274934711	3.99N
1	NEUTRA AIR MORNING 019200791960	3.49
1	POST-IT 3X3 SS EL 021200976223	6.00
SUBTOTAL		42.55
Standard Tax 8.70%		3.35
TOTAL		\$45.90

Debit Tender: 45.90
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TOTAL ITEMS 7

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SPOKANE WA
THOMAS R FALLQUIST
SPOKANE COUNTY CLERK

∴ Date: 08/13/2013
∴ Date: 08/13/2013
dpt #: 2013-02-09766
ier ID: MEH
∴ 03:19 PM

Case Number	Amount
05: Fee-Copies	\$1.50
Due:	\$1.50
entered:	\$1.50
Due:	\$0.00

∴ CASH, PAYER UNKNOWN

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Team Member: David L.
Customer: RICHARD LEE

SALE

SELF-DEFENSE Qty 1 73.50

Matte Paper/SqFt 6 @ 7.2500 T
001450 Reg. Price 7.25
24x36 Foam Mount 1 @ 30.0000 T
000400 Reg. Price 30.00

Price per piece 73.50
Regular Total 73.50
Discounts 0.00

BURDEN OF PROOF Qty 1 61.25

Matte Paper/SqFt 5 @ 7.2500 T
001450 Reg. Price 7.25
Foam Mount/SqFt 5 @ 5.0000 T
000404 Reg. Price 5.00

Price per piece 61.25
Regular Total 61.25
Discounts 0.00

24X36 Qty 1 42.24

Banner Design 1 @ 39.9900 T
002839 Reg. Price 39.99
CLR 11x17 Design 1 @ 2.2500 T
002869 Reg. Price 2.25

Price per piece 42.24
Regular Total 42.24
Discounts 0.00

18X36 Qty 1 42.24

Banner Design 1 @ 39.9900 T
002839 Reg. Price 39.99
CLR 11x17 Design 1 @ 2.2500 T
002869 Reg. Price 2.25

Price per piece 42.24
Regular Total 42.24
Discounts 0.00

WORKING COPY

Qty 1	42.24
anner Design	1 @ 39.9900 T
002839 Reg. Price	39.99
LR 11x17 Design	1 @ 2.2500 T
002869 Reg. Price	2.25
Price per piece	42.24
Regular Total	42.24
Discounts	0.00

Sub-Total	219.23
Tax	19.07
Deposit	84.48

Total	238.30
--------------	---------------

Visa (S)	153.82
----------	--------

Account: XXXXXXXXXX
Auth: 023672 (A)

Total Tender	153.82
Change Due	0.00

Total Discounts 0.00



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lawyerattorney@comcast.net

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FW: Southwest Airlines Confirmation-STEVEN/DAVID L-Confirmation: ZLHMM9

From : Sharon Gerlach <[REDACTED]>
Subject : FW: Southwest Airlines Confirmation-STEVEN/DAVID L-Confirmation: ZLHMM9
To : Richard Lee <[REDACTED]>

Mon, Apr 28, 2014 07:50 PM

How's this? J

From: Southwest Airlines [mailto:SouthwestAirlines@luv.southwest.com]
Sent: Wednesday, October 16, 2013 6:23 PM
To: S [REDACTED]
Subject: Southwest Airlines Confirmation-STEVEN/DAVID L-Confirmation: ZLHMM9

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AIR Itinerary

AIR Confirmation: ZLHMM9

Confirmation Date: 10/16/2013

Passenger(s)	Rapid Rewards #	Ticket #	Expiration	Est. Points Earned
STEVEN/DAVID L	20209256933	5262165154683	Oct 16, 2014	2593

Rapid Rewards points earned are only estimates. Visit your (MySouthwest, Southwest.com or Rapid Rewards) account for the most accurate totals - including A-List & A-List Preferred bonus points.

Date	Flight	Departure/Arrival
Wed Oct 23	2810	Depart SACRAMENTO CA (SMF) on Southwest Airlines at 10:20 AM Arrive in PHOENIX AZ (PHX) at 12:05 PM <u>Wanna Get Away</u>
	1024	Change planes to Southwest Airlines in PHOENIX AZ (PHX) at 1:15 PM Arrive in SPOKANE WA (GEG) at 3:55 PM Travel Time 5 hrs 35 mins <u>Wanna Get Away</u>

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Mon Oct 28 1642 Depart **SPOKANE WA** (GEG) on Southwest Airlines at **12:20 PM**
 Arrive in **PHOENIX AZ** (PHX) at 3:00 PM
[Wanna Get Away](#)

2240 Change planes to Southwest Airlines in **PHOENIX AZ** (PHX) at 4:25 PM
 Arrive in **SACRAMENTO CA** (SMF) at **6:25 PM**
 Travel Time 6 hrs 5 mins
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SMF WN X/PHX WN GEG200.93WLA7PNRO WN X/PHX WN SMF200.93WLA7PNRO 401.86
 END ZPSMFPHXGEGPHX XFSMF4.5PHX4.5GEG4.5PHX4.5 AY10.00\$SMF2.50 PHX2.50
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Cost and Payment Summary

AIR - ZLHMM9

Base Fare	\$ 401.86	Payment Information
Excise Taxes	\$ 30.14	Payment Type: Visa XXXXXXXXXXXXXXX
Segment Fee	\$ 15.60	Date: Oct 16, 2013
Passenger Facility Charge	\$ 18.00	Payment Amount: \$475.60

September 11th Security Fee \$ 10.00
Total Air Cost \$ 475.60



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Fri, Feb 14, 2014 02:06 PM



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B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$2.00
Convenience Fee:	\$0.30
Total:	\$2.30

Expires: 02/14/2014 06:06 PM

E: support@calltopark.com
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From : noreply@calltopark.com
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To : s [REDACTED]

Wed, Mar 05, 2014 08:19 AM



Pay for Parking Receipt

B278
428 W. Dean Ave.
Spokane

Location Code:	201278
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 03/05/2014 06:19 PM

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From : noreply@calltopark.com
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To : [REDACTED]

Mon, Mar 31, 2014 08:22 AM



Pay for Parking Receipt

B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 03/31/2014 06:21 PM

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From : noreply@calltopark.com

Tue, Apr 01, 2014 07:52 AM

Subject : CallToPark Receipt

To : [REDACTED]



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B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 04/01/2014 05:51 PM

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To : [Redacted]

Wed, Apr 02, 2014 09:04 AM



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B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 04/02/2014 07:03 PM

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To : [REDACTED]

Thu, Apr 03, 2014 08:55 AM



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B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 04/03/2014 06:55 PM

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From : noreply@calltopark.com
Subject : CallToPark Receipt
To : [REDACTED]

Mon, Apr 07, 2014 12:48 PM



Pay for Parking Receipt

B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 04/07/2014 10:48 PM

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Subject : CallToPark Receipt
To : [Redacted]

Tue, Apr 08, 2014 08:15 AM



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B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 04/08/2014 06:15 PM

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CallToPark Receipt

From : noreply@calltopark.com
Subject : CallToPark Receipt
To : [REDACTED]

Wed, Apr 09, 2014 08:29 AM



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B279
1210 W. College Ave.
Spokane

Location Code:	201279
Parking Paid:	\$3.00
Convenience Fee:	\$0.30
Total:	\$3.30

Expires: 04/09/2014 06:28 PM

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From : noreply@calltopark.com

Thu, Apr 10, 2014 01:19 PM

Subject : CallToPark Receipt

To : [Redacted]



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B279
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Spokane

Location Code:	201279
Parking Paid:	\$2.00
Convenience Fee:	\$0.30
Total:	\$2.30

Expires: 04/10/2014 05:19 PM

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From : NoReply@DiamondParking.com

Sun, Apr 13, 2014 04:57 PM

Subject : Notice Payment Receipt

To : [Redacted]



Thank you for your payment

This is a confirmation of your payment submitted on **04-13-2014** at **4:57 PM** for **Sharon Gerlach**

Payment Details

Confirmation Number: 165749

Card Number: [Redacted]

Card Type: Visa

Payment Amount: \$19.00

Convenience Fee: \$0.00

Total Amount: \$19.00

Notice Date	Notice Number	Notice Amount	Plate	City	State
04/02/2014	1001379025	\$19.00	[Redacted]	SPOKANE	WA

i If you have questions about this payment or need assistance, please call customer service at 206-729-0590/800-828-4197.
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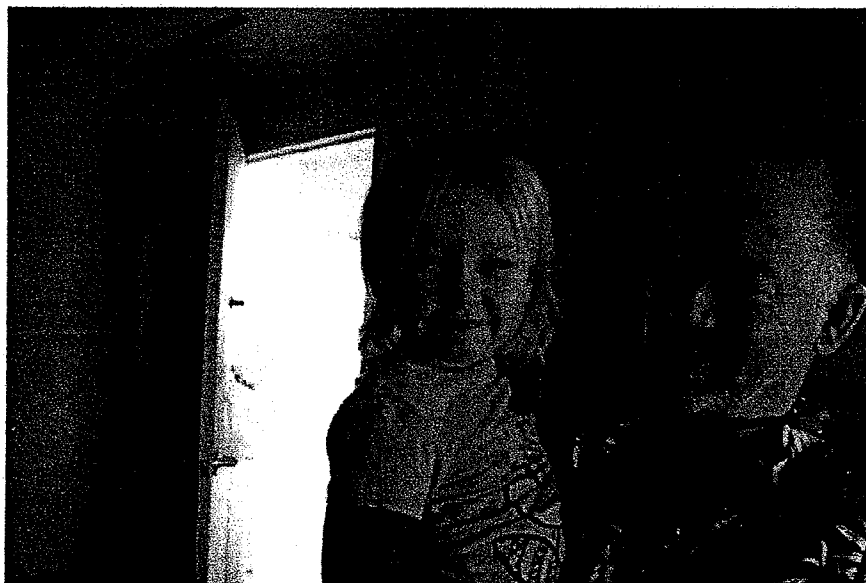
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Created by
Sharon Gerlach

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Raised: \$8,111.00

Goal: \$15,000.00



Updated posted by Sharon Gerlach 23 days ago
We are ecstatic that we received a NOT GUILTY verdict and the jury found for self-defense. What a victory!

Any donations received from this point forward will be given to our legal counsel for any ongoing expenses related to the trial. It will take some time for the State of Washington to settle their bill.

We also encourage you to turn your attention to other cases of self-defense that are being taken to trial, one such case being that of USAF Tech Sgt Matthew Pinkerton.

Our debt to all of you is enormous, exceeded only by our gratitude for your willingness to come to the aid of (to some of you) complete strangers. God has truly blessed us, and it is our hope that He will greatly bless you as well.

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\$8,111 raised by 114 people in 11 months.

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Mary Roy
28 days ago

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Daniel Francis
1 month ago

Praying for Mr. Gerlach's acquittal every day.

\$200.00

Various donors
1 month ago (Offline Donation)

\$50.00

Anonymous

Date: August 22, 2013
Receipt # 1

David L. Stevens
Attorney at Law
[City, ST ZIP Code]
(509) 869-4547
David_stevens@davidstevens.or
g

SOLD TO Gail H. Gerlach
[Redacted]
Spokane, WA 99202
[Redacted]

PAYMENT METHOD

cash

Legal representation

DESCRIPTION	DATE	LINE TOTAL
Per diem expense upon arrival	Thursday, August 8, 2013	\$300.00
Per diem expense	Thursday, August 15, 2013	\$400.00
Per diem expense before next session.	Thursday, August 22, 2013	\$400.00

SUBTOTAL
SALES TAX
TOTAL \$1,100.00

Thank you for your business!

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APR 14 2014

SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

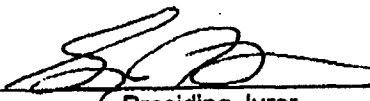
STATE OF WASHINGTON)	
)	
Plaintiff,)	No. 13-1-01907-9
)	
v.)	VERDICT FORM A
)	
GAIL HERBERT GERLACH,)	
Defendant.)	

We, the jury, find the defendant, GAIL HERBERT GERLACH,

Not Guilty of the crime of MANSLAUGHTER IN THE FIRST DEGREE
(write in not guilty or guilty)

as charged.

DATE: 4/10/14


Presiding Juror

FILED
APR 14 2014
SPOKANE COUNTY CLERK

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

STATE OF WASHINGTON)
)
 Plaintiff,)
)
 v.)
)
 GAIL HERBERT GERLACH,)
 Defendant.)

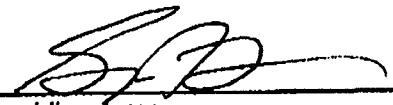
No. 13-1-01907-9
VERDICT FORM B

We, the jury, having found the defendant not guilty of the crime of
MANSLAUGHTER IN THE FIRST DEGREE as charged, or being unable to unanimously agree as
to that charge, find the defendant

Not Guilty of the lesser included crime of MANSLAUGHTER IN THE
(write in not guilty or guilty)

SECOND DEGREE.

DATE: 4/10/14


Presiding Juror

FILED

APR 14 2014

SPOKANE COUNTY CLERK

ORIGINAL
IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF SPOKANE

STATE OF WASHINGTON)	
)	
Plaintiff,)	No. 13-1-01907-9
)	
v.)	SPECIAL INQUIRY FORM
)	
GAIL HERBERT GERLACH,)	
Defendant.)	

We, the jury, return a special verdict by answering as follows:

QUESTION 1: Did the defendant, Gail Herbert Gerlach prove by a preponderance of the evidence that the use of force was justified?

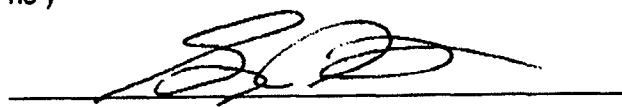
ANSWER: Yes
(write "yes" or "no")

(DIRECTION: If you answered "no" to Question 1, sign this verdict and notify the judicial assistant. If you answered "yes" to Question 1, answer Question 2, then sign the form and notify the judicial assistant.)

QUESTION 2: Was the defendant engaged in criminal conduct substantially related to the events giving rise to the crime with which the defendant was charged?

ANSWER: No
(write "yes" or "no")

DATED: 4/10/14



Richard F. Lee

Attorney at Law

AGREEMENT FOR LEGAL SERVICES

The undersigned, Gale H. Gerlach, hereinafter called "client," employs Richard Lee, hereinafter called "attorney", for the purpose of representing him in Spokane County Superior Court case for the homicide allegation arising on or about Monday, March 25, 2013. Attorney will not represent client in any civil claim.

Client and attorney mutually agree as follows:

Legal Fees

1. The rate will be \$300.00 an hour including all research, interviews, travel time, consultation time with experts, court time, and trial time. Lawyer reserves the right to collect legal fees under statute from the State of Washington/County of Spokane in the event of an acquittal at trial as per statute.

Costs

2. The client agrees to pay or reimburse the attorney for all costs and disbursements incurred in the investigation and defense of this matter, which may include out-of-pocket expenses including, but not limited to, court filing fees, copying charges, court reporter's charge, records fees, professional service fees charged by experts, travel, long distance telephone, fax charges, taxes from city, county and/or state, and other disbursements. The client agrees to promptly pay such costs and disbursements upon receipt of invoice from the attorney or the provider of the services. In the event suit is brought, client agrees to pay costs, including reasonable attorney fees, venue to be in Spokane County, State of Washington.

Withdrawal and Discharge

3. Either party may terminate this agreement upon reasonable advance written notice to the other party. Upon termination, the client shall pay all fees, expenses and costs incurred prior to termination to the attorney. Thereafter, the attorneys will deliver to the client original documents entrusted to him, as well as any documents which client has paid for which have not previously been delivered. Upon termination, the client may obtain copies of any other documents maintained in the attorneys' files on the client's behalf upon request and upon payment in advance of photocopying charges. Attorney shall also be entitled to copies of all documents not previously copied and client shall pay such copying expenses.

Power of Attorney

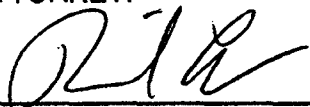
4. Clients grants attorney client's power of attorney to act as client's attorney in fact to do all things necessary and proper in handling clients' claim and defense, including the execution of pleadings, contracts, and releases.


No Guarantee

5. **Attorney makes no warranties regarding the successful handling of the defense. There is no guarantee of an acquittal, reimbursement from the State, or that the felony charge will be dropped or reduced.** All expressions relative thereto are matters of attorney's opinion only.

ATTORNEY:

CLIENT:

BY: 
Richard F. Lee

BY: 
Gail H. Gerlach

DATE: June 20, 2013

DATE: June 20, 2013

David Stevens, Attorney at Law

AGREEMENT FOR LEGAL SERVICES

The undersigned, Gale H. Gerlach, hereinafter called "client," employs David Stevens, hereinafter called "attorney", for the purpose of representing him in Spokane County Superior Court case for the homicide allegation arising on or about Monday, March 25, 2013. Attorney will not represent client in any civil claim.

Client and attorney mutually agree as follows:

Legal Fees

1. The rate will be \$200.00 an hour including all research, interviews, travel time, consultation time with experts, court time, and trial time. The rate at trial will be \$300.00 an hour. Lawyer reserves the right to collect legal fees under statute from the State of Washington/County of Spokane in the event of an acquittal at trial as per statute.

Costs

2. The client agrees to pay or reimburse the attorney for all costs and disbursements incurred in the investigation and defense of this matter, which may include out-of-pocket expenses including, but not limited to, court filing fees, copying charges, court reporter's charge, records fees, professional service fees charged by experts, travel, per diem, long distance telephone, fax charges, taxes from city, county and/or state, and other disbursements. The client agrees to promptly pay such costs and disbursements upon receipt of invoice from the attorney or the provider of the services. In the event suit is brought, client agrees to pay costs, including reasonable attorney fees, venue to be in Spokane County, State of Washington.

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3. Either party may terminate this agreement upon reasonable advance written notice to the other party. Upon termination, the client shall pay all fees, expenses and costs incurred prior to termination to the attorney. Thereafter, the attorneys will deliver to the client original documents entrusted to him, as well as any documents which client has paid for which have not previously been delivered. Upon termination, the client may obtain copies of any other documents maintained in the attorneys' files on the client's behalf upon request and upon payment in advance of photocopying charges. Attorney shall also be entitled to copies of all documents not previously copied and client shall pay such copying expenses.

Power of Attorney

4. Clients grants attorney client's power of attorney to act as client's attorney in fact to do all things necessary and proper in handling clients' claim and defense, including the execution of pleadings, contracts, and releases.

No Guarantee

5. Attorney makes no warranties regarding the successful handling of the defense. There is no guarantee of an acquittal, reimbursement from the State, or that the felony charge will be dropped or reduced. All expressions relative thereto are matters of attorney's opinion only.

ATTORNEY:

CLIENT:

BY: 
David Stevens

BY: 
Gail H. Gerlach

DATED: August 6, 2013

DATED: August 6, 2013

ORIGINAL

BORDER LAW FIRM RETAINER AGREEMENT

I have discussed my case with and initially accept, Teresa L. Border, of the BORDER LAW FIRM, as my attorney on the following case(s): Co-counsel advice and representation for pending criminal charge of First Degree Manslaughter.

1. **MINIMUM ADVANCE FEES.** The minimum advance fee for representation in this proceeding will be \$ N/A. The minimum fee will be not be placed in a trust account, but will rather be deposited into the attorney's general checking account. This minimum advanced fee retainer is un-refundable and shall be retained by the Border Law Firm even if the client chooses to cease representation by the Border Law Firm.

Both of the undersigned parties agree that the minimum advance fee is an estimated figure only, and is not what total costs may be. It is specifically understood by the client that this figure is not guaranteed and would depend on a great many factors which cannot all be foreseen at the beginning of this case. The Border Law Firm cannot state at this point the number of hours that will be necessary to represent the client in this case, and therefore, cannot guarantee what the actual fee will be at conclusion. The type of tasks that will be performed by the attorney on behalf of the client will depend a great deal on the actions of the opposing party and his or her counsel.

If the attorney fees, computed at the hourly rate listed below, exceed the minimum advance fee, an additional advance fee will be required for continued representation.

AA
Client's Initials

2. **HOURLY ATTORNEY RATE.** The hourly rate for Teresa L. Border of the Border Law Firm is \$250.00 per hour. In the event this case goes to trial, the trial fee is \$2000 per day.

3. **ADVANCE FEE AND COSTS RETAINER.** When the attorney fees computed at the hourly rate have depleted the minimum advance fee as designated above, the client shall pay an additional advance fee of \$ N/A. This additional fee will be placed in the attorney's trust account with said amount to be designated as future payment of attorney's fees

and/or anticipated costs. Appropriate amounts shall be withdrawn from the attorneys trust account as fees are earned and expenditures made. The Border Law Firm agrees that if any portion of this amount in trust is unexpended at the conclusion of the case that it will be refunded to the client. Client will be billed monthly for all current and outstanding balances and hereby consents to the payment of the obligation with the firm from the funds remaining in the attorneys trust account. If the amount in the trust account is insufficient then any deficiency will be billed and paid by the client promptly.

- a) Current charges are to be paid in full by the 15th day of the month in which the bill is sent, unless otherwise agreed by the parties. In the event that the parties agree to a payment plan other than payment in full of current charges, the outstanding balance will under no circumstances be permitted to exceed \$5000.00.
- b) FAILURE TO COMPLY WITH THE TERMS OF THIS AGREEMENT AS SET OUT ABOVE MAY RESULT IN WITHDRAWAL OF THE ATTORNEY'S SERVICES UPON NOTICE TO THE CLIENT.

4. MISCELLANEOUS COSTS AND EXPENSES. In the course of this action, and in order to adequately protect client's interests, it may be necessary to incur various expenses. These may include the following costs and expenses:

- a) Expert witness fees;
- b) Long distance telephone charges, postage & machine copies;
- c) Travel, meals, and lodging, where such are reasonably required;
- d) All other out-of-pocket expenses directly devoted to client's cause such as filing fees, witness fees, depositions, travel expenses of depositions, investigative expenses, and other incidental expenses.

5. WITHDRAWAL. The Border Law Firm reserves the right to withdraw from client's cause of action subject to prior notice, and client reserves the right to terminate the services of the Border Law Firm subject to prior notice. The Border Law Firm Attorney specifically reserves the right to withdraw upon client's failure to pay legal fees and costs on a current basis. In case of withdrawal or termination, it is understood and agreed that all fees and costs previously incurred will immediately be paid in full by client.

6. INQUIRIES ABOUT BILL. Should the client at any time prior to the conclusion of Teresa L. Border's services have a questions, disagreements, or other concerns regarding the outstanding fees or costs balances, the attorney responsible for the file will review the client's questions, disagreements, or concerns without charge. Once the Border law Firm's services have been terminated, questions, disagreements, or concerns must be received within 10 days from the date the final bill is sent or they will be deemed waived.

7. LATE CHARGES. Late charges are added to the outstanding balance of any amount not paid in full each month. The unpaid balance will accrue interest at 1% per

month (12 % per annum).

The undersigned has read the above, understands it, and agrees to abide by all terms and conditions herein, and has been provided with a copy of this agreement.

DATED THIS 20th day of March, 2014.

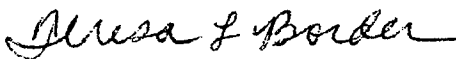
Approved and Accepted by:



Client's Signature

GAIL GERBACE

Client's Printed Name



TERESA L. BORDER