

**ARNA TOWNSHIP -- HUGHES ENFORCEMENT LEGAL SERVICES BILLINGS**

<u>Date</u>	<u>Amount billed</u>
2/2/2021	\$770.00
3/12/2021	\$935.00
4/16/2021	\$605.00
5/10/2021	\$660.00
6/4/2021	\$165.00
10/6/2021	\$1,650.00
11/5/2021	\$815.00
12/9/2021	\$110.00
2/9/2022	\$287.50
3/2/2022	\$460.00
4/14/2022	\$4,451.70
5/10/2022	\$460.00
6/6/2022	\$287.50
8/3/2022	\$2,300.00
9/9/2022	\$575.00
10/6/2022	\$3,682.50
11/11/2022	\$345.00
12/5/2022	\$1,782.50
<b>TOTAL</b>	<b>\$20,341.70</b>

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
1/14/2021	Telephone conference with Bob Brewster regarding ordinance violations and procedure to bring a court action.	0.75 \$220.00/hr	\$165.00 Hourly
1/18/2021	Review materials sent by Bob Brewster regarding Hughes enforcement; check deed records at Pine County Recorder's website to get copies of deeds regarding ownership of properties; check rules regarding service of summons and complaint when defendants are deceased.	1.00 \$220.00/hr	\$220.00 Hourly
1/19/2021	Work on abatement agreement.	1.25 \$220.00/hr	\$275.00 Hourly
1/22/2021	Telephone conference with Bob Brewster regarding Hughes property violations.	0.50 \$220.00/hr	\$110.00 Hourly
	SUBTOTAL:	[ 3.50	<u>\$770.00]</u>

Hrs/Rate      Amount

**HUGHES ENFORCEMENT**

2/5/2021	Review email and photos sent by Bob Brewster; email back to Bob.	0.25 \$220.00/hr	\$55.00 Hourly
2/22/2021	Review relevant zoning ordinance provisions and nuisance ordinance provisions; review photos and correspondence from Bob Brewster; draft letter to Hughes citing all ordinance and law violations; telephone conference with Bob Brewster regarding same.	2.50 \$220.00/hr	\$550.00 Hourly
			\$115
2/25/2021	Review zoning ordinance enforcement provisions; revise letter to Hughes to comply with steps; revise notice of violation form; draft email to Bob Brewster regarding next steps.	1.50 \$220.00/hr	\$330.00 Hourly
			\$115
SUBTOTAL:		[ 4.25	\$935.00]

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
3/1/2021	Review changes to letter and notice made by Bob Brewster.	0.25 \$220.00/hr	\$55.00 Hourly
	Review changes to Hughes documents suggested by Bob Brewster; make changes and email document to Bob for review before sending to Hughes.	0.75 \$220.00/hr	\$165.00 Hourly
	Telephone conference with Bob Brewster regarding Hughes letter.	0.25 \$220.00/hr	\$55.00 Hourly
3/9/2021	Conference with staff regarding Hughes litigation.	0.50 \$220.00/hr	\$110.00 Hourly
3/15/2021	Telephone conference with Bob Brewster regarding procedure on Hughes property.	0.25 \$220.00/hr	\$55.00 Hourly
3/26/2021	Telephone conference with Bob Brewster regarding Hughes resolution to authorize litigation; telephone conference with Al Brixius of Northwest Associated Consultants regarding appearing as a zoning expert witness.	0.75 \$220.00/hr	\$165.00 Hourly
	SUBTOTAL:	[ 2.75	\$605.00]

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
3/29/2021	Telephone conference with Bob Brewster regarding authorization to proceed and timing of administrative search warrant on the property.	0.25 \$220.00/hr	\$55.00 Hourly
4/2/2021	Conference with staff regarding Hughes administrative search warrant.	0.25 \$220.00/hr	\$55.00 Hourly
4/5/2021	Work on application for administrative search warrant and conference with staff.	2.00 \$220.00/hr	\$440.00 Hourly
4/6/2021	Conference with staff regarding administrative search warrant.	0.25 \$220.00/hr	\$55.00 Hourly
4/12/2021	Review administrative search warrant.	0.25 \$220.00/hr	\$55.00 Hourly
SUBTOTAL:		[ 3.00	<u>\$660.00]</u>

6/4/2021

Arna Township

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Hrs/Rate

Amount

**HUGHES ENFORCEMENT**

5/13/2021	Telephone conference with Bob Brewster regarding Hughes property moving RVs to Johnson property and issues related to zoning ordinance amendments.	0.75 \$220.00/hr	\$165.00 Hourly
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SUBTOTAL:

[ 0.75

\$165.00]

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
9/15/2021	Telephone conference with Bob Brewster regarding complaint to be filed against the Hughes property.	0.25 \$220.00/hr	\$55.00 Hourly
9/23/2021	Work on Hughes complaint.	1.00 \$220.00/hr	\$220.00 Hourly
9/26/2021	Review file and draft summons and complaint.	3.50 \$220.00/hr	\$770.00 Hourly
9/28/2021	Revise complaint; email to Bob Brewster regarding same.	1.75 \$220.00/hr	\$385.00 Hourly
9/29/2021	Telephone conference with Bob Brewster regarding Hughes court complaint and changes to same.	1.00 \$220.00/hr	\$220.00 Hourly
	SUBTOTAL:	[ 7.50	<u>\$1,650.00</u> ]

Hrs/Rate      Amount

**HUGHES ENFORCEMENT**

10/7/2021	Telephone conference with Bob Brewster regarding alley claim in Hughes complaint.	0.25 \$220.00/hr	\$55.00 Hourly
10/8/2021	Research case law on standard for issuing an injunction prohibiting Hughes from maintaining a nuisance; email to Bob Brewster regarding same.	1.50 \$220.00/hr	\$330.00 Hourly <b>\$57</b>
10/11/2021	COST ADVANCED: PINE COUNTY SHERIFF FOR CIVIL PROCESS FEE (SERVICE OF SUMMONS AND COMPLAINT ON HUGHES).		\$75.00 Flat
10/19/2021	Telephone conference with Bob Brewster regarding new RV moved onto Hughes property.	0.25 \$220.00/hr	\$55.00 Hourly
11/1/2021	COST ADVANCED: PINE COUNTY DISTRICT COURT FOR COURT FILING FEE (SUMMONS & COMPLAINT, CIVIL COVER SHEET, CERTIFICATE OF SERVICE FROM PINE COUNTY SHERIFF).		\$300.00 Flat
SUBTOTAL:		[ 2.00	<u>\$815.00]</u>



**COURI & RUPPE, P.L.L.P.**

**Michael C. Couri**  
**Robert T. Ruppe**

*\*Also licensed in Illinois*

*\*\*Also licensed in California*

*Attorneys at Law*  
*705 Central Avenue East*  
*PO Box 369*  
*St. Michael, MN 55376-0369*  
**(763) 497-1930**  
*(763) 497-2599 (FAX)*  
*www.couriruppe.com*

December 9, 2021

Arna Township  
Cheryl Wickham, Clerk  
49910 First Avenue  
Markville, MN 55072

Re: Professional Services Rendered

	<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>		
11/12/2021	0.25 \$220.00/hr	\$55.00 Hourly
11/19/2021	0.25 \$220.00/hr	\$55.00 Hourly
SUBTOTAL:	[ 0.50	<u>\$110.00</u> ]

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**Michael C. Couri**  
**Robert T. Ruppe**

*Attorneys at Law*

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705 Central Avenue East  
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*(763) 497-2599 (FAX)*  
*www.couriruppe.com*

February 9, 2022

Arna Township  
Cheryl Wickham, Clerk  
49910 First Avenue  
Markville, MN 55072

Re: Professional Services Rendered

	<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>		
1/24/2022 Amend Complaint to include a count alleging a zoning violation and research law regarding requirements to amend the complaint.	1.25 \$230.00/hr	NO CHARGE Hourly
1/25/2022 Review Court's scheduling order and calendar all deadlines.	0.25 \$230.00/hr	\$57.50 Hourly
Telephone conference with Bob Brewster regarding amendment to Hughes complaint and clean up Hughes has done to date.	1.00 \$230.00/hr	\$230.00 Hourly
SUBTOTAL:	[ 2.50	<u>\$287.50</u> ]

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**Michael C. Couri**  
**Robert T. Ruppe**

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March 2, 2022

Arna Township  
Cheryl Wickham, Clerk  
49910 First Avenue  
Markville, MN 55072

Re: Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
2/1/2022	Search court mediator list to choose potential mediators; email to selected mediators for rates and willingness to perform mediation.	0.50 \$230.00/hr	\$115.00 Hourly
2/2/2022	Emails to mediators; draft letter to Hughes regarding mediation.	0.50 \$230.00/hr	\$115.00 Hourly
2/7/2022	Draft discovery request to inspect property.	0.50 \$230.00/hr	\$115.00 Hourly
2/14/2022	Draft email to Bob Brewster regarding discovery issued to Hughes for inspection of the property.	0.25 \$230.00/hr	\$57.50 Hourly
2/21/2022	Telephone conference with Al Brixius regarding property inspection of Hughes property.	0.25 \$230.00/hr	\$57.50 Hourly
SUBTOTAL:		[ 2.00	<u>\$460.00</u>

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April 14, 2022

Arna Township  
Cheryl Wickham, Clerk  
49910 First Avenue  
Markville, MN 55072

Re: Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
2/28/2022	Issue new Request to Inspect property and draft letter to Hughes regarding same.	0.25 \$230.00/hr	\$57.50 Hourly
3/14/2022	Telephone conference with Bob Brewster regarding inspection of Hughes property.	0.25 \$230.00/hr	\$57.50 Hourly
3/17/2022	Prepare for inspection of Hughes property; travel to Arna Township and view and photograph Hughes property.	3.75 \$230.00/hr	\$862.50 Hourly
	Review all Hughes pictures to determine what items violate the nuisance ordinance; draft affidavit of Al Brixius.	3.00 \$230.00/hr	\$690.00 Hourly
3/18/2022	Review motion for summary judgment regarding Hughes violation and conference with staff.	1.00 \$230.00/hr	\$230.00 Hourly
	Draft memorandum of law in support of summary judgment; draft affidavit of Mike Couri; draft proposed order; draft notice of motion; prepare all exhibits and draft letter to David Hughes.	7.00 \$230.00/hr	\$1,610.00 Hourly

4/14/2022

Arna Township

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	<u>Hrs/Rate</u>	<u>Amount</u>
3/22/2022 Telephone conference with Bob Brewster regarding Hughes motion and issues related to the alley.	0.50 \$230.00/hr	\$115.00 Hourly
4/5/2022 COST ADVANCED: PINE COUNTY SHERIFF FOR DEPUTY TIME AT SITE INSPECTION ON 3/17/2022.		\$134.00 Flat
COST ADVANCED: NORTHWEST ASSOCIATED CONSULTANTS, INC. FOR CODE ENFORCEMENT SITE INSPECTION ON 3/17/2022.		\$695.20 Flat
<b>SUBTOTAL:</b>	<b>[ 15.75</b>	<b><u>\$4,451.70</u></b>

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May 10, 2022

Arna Township  
Cheryl Wickham, Clerk  
49910 First Avenue  
Markville, MN 55072

Re: Professional Services Rendered

	<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>		
4/19/2022 Prepare for summary judgment motion.	0.75 \$230.00/hr	\$172.50 Hourly
4/20/2022 Prepare for motion hearing; attend motion hearing and argue motion for summary judgment; revise proposed order and send to Court.	1.25 \$230.00/hr	\$287.50 Hourly
SUBTOTAL:	[ 2.00	<u>\$460.00</u> ]

Hrs/Rate      Amount

**HUGHES ENFORCEMENT**

4/29/2022	Telephone conference with Bob Brewster regarding Hughes moving stuff to another property in the Township.	0.25 \$230.00/hr	\$57.50 Hourly
5/4/2022	Telephone conference with Bob Brewster regarding Hughes moving items to Tracy Erickson's property.	0.25 \$230.00/hr	\$57.50 Hourly
5/13/2022	Telephone conference with Bob Brewster regarding items moved from Hughes property to other properties in the Township.	0.50 \$230.00/hr	\$115.00 Hourly
5/18/2022	Telephone conference with Bob Brewster regarding timing of getting bids and removing nuisances from Hughes property.	0.25 \$230.00/hr	\$57.50 Hourly
SUBTOTAL:		[ 1.25	<u>\$287.50]</u>

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
6/24/2022	Telephone conference with Bob Brewster regarding cleanup of Hughes property and timing of same.	0.25 \$230.00/hr	\$57.50 Hourly
	Telephone conference with Terry Peterson regarding potential cleanup of Hughes property; letter to Hughes regarding cleanup.	0.50 \$230.00/hr	\$115.00 Hourly
7/1/2022	Conference with staff and telephone conference with Sheriff's office regarding Hughes property.	0.25 \$230.00/hr	\$57.50 Hourly
7/6/2022	Telephone conference with Bob Brewster regarding inspection of Hughes property scheduled for July 7, 2022.	0.25 \$230.00/hr	\$57.50 Hourly
	Revise Affidavit of Mike Couri; revise memo to Court; research legal standard for compelling discovery; revise proposed order; review exhibits to affidavit; telephone conference with Court regarding hearing date.	1.50 \$230.00/hr	\$345.00 Hourly
7/7/2022	Travel to Arna Township and meet with contractor to inspect Hughes property to determine what needs cleaned up; travel back.	5.50 \$230.00/hr	\$1,265.00 Hourly
7/12/2022	Telephone conference with Bob Brewster regarding Hughes cleanup quote.	0.50 \$230.00/hr	\$115.00 Hourly
7/13/2022	Telephone conference with Bob Brewster regarding Hughes cleanup bid and timing of cleanup.	0.50 \$230.00/hr	\$115.00 Hourly
7/14/2022	Draft emails to Chad Lucas regarding cleanup; determine which pictures to send to Chad.	0.50 \$230.00/hr	\$115.00 Hourly
7/20/2022	Telephone conference with Bob Brewster regarding Lucas cleanup quote; review quote.	0.25 \$230.00/hr	\$57.50 Hourly
	<b>SUBTOTAL:</b>	[ 10.00	<b><u>\$2,300.00</u></b> ]



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705 Central Avenue East  
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September 9, 2022

Arna Township  
Cheryl Wickham, Clerk  
49910 First Avenue  
Markville, MN 55072

Re: Professional Services Rendered

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
8/2/2022	Telephone conference with Bob Brewster regarding clean up of Hughes property on August 18th.	0.25 \$230.00/hr	\$57.50 Hourly
8/11/2022	Telephone conference with Pine County Sheriff's office regarding police staffing during Hughes clean up.	0.25 \$230.00/hr	\$57.50 Hourly
8/12/2022	Telephone conference with Pine County Sheriff's Office and Jones Excavating regarding cleanup date change; email to Bob Brewster regarding Hughes cleanup date and Sheriff's presence.	0.75 \$230.00/hr	\$172.50 Hourly <b>\$57</b>
8/16/2022	Telephone conference with Christy Atkins regarding court ordered cleanup of Hughes property; telephone conference with Bob Brewster regarding same.	0.75 \$230.00/hr	\$172.50 Hourly <b>\$115</b>
8/19/2022	Draft letter to Christy Atkins; telephone conference with Bob Brewster regarding status of property to be cleaned up.	0.50 \$230.00/hr	\$115.00 Hourly <b>\$57</b>

9/9/2022

Arna Township

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	<u>Hrs/Rate</u>	<u>Amount</u>
SUBTOTAL:	[ 2.50	<u>\$575.00</u>

Hrs/Rate      Amount

**HUGHES ENFORCEMENT**

8/24/2022	Travel to Hughes property and attend the cleanup of the Hughes property; travel back.	8.50 \$230.00/hr	\$1,955.00 Hourly
	COST ADVANCED: PINE COUNTY SHERIFF'S OFFICE FOR DEPUTY TIME AT HUGHES PROPERTY CLEANUP.		\$670.00 Flat
8/26/2022	Email to Bob Brewster regarding invoice for cleanup from contractor and summary of cleanup of the property.	0.25 \$230.00/hr	\$57.50 Hourly
	Telephone conference with Bob Brewster regarding assessment process to recover Hughes' costs and items that Hughes moved elsewhere in the Township.	1.00 \$230.00/hr	\$230.00 Hourly
9/12/2022	Telephone conference with Bob Brewster regarding assessment process and costs to be assessed to Hughes property.	0.50 \$230.00/hr	\$115.00 Hourly
	Compile all costs of cleaning Hughes property and draft resolution setting assessment hearing.	1.00 \$230.00/hr	\$230.00 Hourly
9/13/2022	COST ADVANCED: PINE COUNTY DISTRICT COURT ADMINISTRATION FOR MOTION FILING FEE FILED ON MARCH 23, 2022.		\$80.00 Flat
	Compile all costs; draft resolution setting assessment hearing; draft email to Bob Brewster regarding same.	1.00 \$230.00/hr	\$230.00 Hourly
9/15/2022	Telephone conference with Bob Brewster regarding Town Board decisions on Hughes property.	0.50 \$230.00/hr	\$115.00 Hourly
	SUBTOTAL:	[ 12.75	<b>\$3,682.50]</b>

\$57

Hrs/Rate      Amount

**HUGHES ENFORCEMENT**

10/14/2022	Draft mailed and published notice of assessment hearing; email to Bob Brewster.	1.00 \$230.00/hr	\$230.00 Hourly \$57
10/19/2022	Prepare mailed notice of assessment hearing; conference with staff regarding mailing notice to all siblings of David Hughes.	0.50 \$230.00/hr	\$115.00 Hourly
SUBTOTAL:		[ 1.50	<u>\$345.00</u> ]

		<u>Hrs/Rate</u>	<u>Amount</u>
<b><u>HUGHES ENFORCEMENT</u></b>			
11/8/2022	Telephone conference with Bob Brewster regarding Hughes trailer that has been moved back onto his property and options for removing same.	0.25 \$230.00/hr	\$57.50 Hourly
11/10/2022	Telephone conference with Bob Brewster regarding Hughes case and Town Board decision regarding same.	0.25 \$230.00/hr	\$57.50 Hourly
11/11/2022	Draft assessment resolution and certification of assessment in preparation for Monday's special assessment hearing.	0.75 \$230.00/hr	\$172.50 Hourly
11/14/2022	Travel to Arna Township for special assessment hearing; attend hearing and travel back.	6.50 \$230.00/hr	\$1,495.00 Hourly
SUBTOTAL:		[ 7.75	<u>\$1,782.50</u> ]

Bob Brewster's total communication with lawyer \$3,779 = 16.5Hr

Lawyers travel fees to Arna X4 \$5,577.50 = 24.5 Hr

Total Bob Brewster communication, with and travel for lawyer \$9356.50