

10/26/2016

Castle Rock Town Council
100 N Wilcox St
Castle Rock, CO 80104

To Castle Rock Town Council,

Pursuant to Ordinance No. 2016-026, I am formally requesting a reimbursement of \$13,995.94 plus one month service charge in the amount of approximately \$70.00 for expenses I personally incurred challenging the sufficiency of the recall petition filed against me in April, 2016.

Abraham Laydon was the attorney from Burns, Figa and Will, PC who represented my interests in the protest proceedings in April. I have included a copy of the bill that was generated by Burns, Figa, and Will, P.C. as of Tuesday, 10/18/16, in regard to those specific proceedings.

In my opinion, these expenses are qualified for reimbursement consideration from the Castle Rock Town Council under Ordinance 2016-026 as I was able to retain my seat on Town Council and these expenses are directly related to determining the sufficiency of the recall petition.

I have paid \$10,000 out of my own pocket as of 10/26/16 and still owe \$3,995.94 to Burns, Figa and Will.

Thank you for your consideration of this matter,

Paul Donahue

In Account With:

Burns, Figa & Will, P.C.
6400 S. Fiddlers Green Circle
Suite 1000
Greenwood Village, Colorado 80111
(303) 796-2626
Fed Tax ID 84-0818134

Paul Donahue

Castle Rock CO

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April 30, 2016

Account No: 6810-0000M
Statement No: 140358



Recall Protest and Related Negotiations

Legal Fees through 04/30/2016

Hours

04/20/2016	AJL	NO CHARGE: Review correspondence from Councilmember Green regarding matter and representation; review message from Mr. Donahue; substantive telephone conference with Mayor Donahue regarding recall and status.	1.60	n/c
	AJL	Legal analysis and review media coverage regarding recall; draft email correspondence to Mayor Donahue regarding same.	2.30	
04/21/2016	OZ	NO CHARGE: Legal research regarding procedural requirements; review related documents provided by Mayor Donahue.	1.80	n/c
	AJL	Attention to draft protest of recall; review petitions and associated protest addenda; draft protest correspondence; substantive telephone conference with Mayor Donahue and multiple email exchanges regarding same; confer with Attorney Zhivnitskaya regarding protest of recall; legal analysis regarding same.	7.40	
04/22/2016	AJL	Review substantive correspondence from Ms. Misare regarding hearing; legal analysis and attention to witness and hearing preparations; attention to communications with GOP supporters regarding same.	3.20	
04/25/2016	AJL	Meet and confer with Mayor Donahue in office regarding status and strategy; telephone conference with Vice Chair Brad Wann; mobilize political support for Mayor Donahue; draft substantive email regarding same and confer with DCGOP officers regarding messaging; confer with Attorney Zhivnitskaya regarding Town Charter and statutory requirements for recall; attention to witness preparations.	6.30	
04/26/2016	OZ	NO CHARGE: Confer with Attorney Laydon regarding hearing on petition for recall; attention to same.	3.00	n/c

Recall Protest and Related Negotiations

Hours

AJL Substantive telephone conference with Councilwoman Green regarding social media flare up and associated issues; telephone conference with Mayor. Donahue regarding same, answer questions regarding status, and strategize together regarding next steps; confer with Attorney Zhivnitskaya regarding additional options for resolution; telephone conference with political activist and DCGOP Vice Chair regarding organizing support for Mayor Donahue and conversations with opposition; substantive telephone conference with Attorney Placke regarding status and options to resolve; issue analysis and attention to witness list and hearing preparations.

9.80

04/27/2016 OZ Attention to preparation for the hearing related to protest to recall petition.

2.40

AJL Hearing preparation; finalize trial binder; review and revise cross and direct of witnesses; finalize opening statement and closing statement; confer with Attorney Zhivnitskaya regarding same; multiple confer with Mayor Donahue regarding same; draft substantive email correspondence to Attorney Placke; coordinate political support from DCGOP; multiple conversations regarding same; telephone conference with FOX31 News reporter; meet with same in office for televised interview in support of Mayor Donahue; issue analysis regarding same.

11.40

04/28/2016 OZ NO CHARGE: Travel to and attend a hearing related to the protest of the recall petition; confer with Attorney Laydon regarding the same.

3.20

n/c

AJL Finalize hearing preparation and travel to Castle Rock; confer with Mayor Donahue regarding testimony; confer with witnesses regarding same; attend hearing and present case before hearing officer in Council Chambers; review and debrief with Attorney Zhivnitskaya; legal analysis regarding same.

7.30

For Current Services Rendered

50.10

12,345.00

Professional Summary

Timekeeper

Hours

Rate

Abraham J. Laydon, Esq.

47.70

\$250.00

Olga Zhivnitskaya, Esq.

2.40

175.00

Expenses

04/28/2016 Mileage; Hearing in Castle Rock; Olga Zhivnitskaya

19.21

Total Expenses

19.21

Total Current Work Due

12,364.21

Payments Received through 04/30/2016

Total Payments for 04/30/2016

-1,000.00

Balance as of 04/30/2016**\$11,364.21**

Paul Donahue

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April 30, 2016

Account No: 6810-0000M

Statement No: 140358

Recall Protest and Related Negotiations

Client Funds

	Beginning Client Funds Balance	\$0.00
04/21/2016	Deposit to client funds - credit cards	1,000.00
04/30/2016	Payment	-1,000.00
	Ending Client Funds Balance	\$0.00
	Please Remit	<u>\$11,364.21</u>

Payments received after the date of this invoice will be reflected on your next statement.

PAYMENT IS DUE OCTOBER 31, 2016

Please include account # on payment.

We appreciate the opportunity to serve your legal needs.

In Account With:

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May 31, 2016

Account No: 6810-0000M
Statement No: 140870

Recall Protest and Related Negotiations

Legal Fees through 05/31/2016

Hours

05/02/2016	OZ	Legal research related to deadlines and procedure to appeal decision by a hearing officer.	0.50	
	AJL	Review final orders; legal analysis and contact clerk for transcript of hearing; respond to multiple inquiries regarding orders; telephone conference with Mr. Donahue regarding same.	2.80	
05/03/2016	OZ	Review the decision of the hearing officer; contact town clerk regarding the appeal procedure; advise Attorney Laydon of the same; review the video recording of the hearing.	1.20	
05/04/2016	OZ	Confer with Attorney Laydon regarding the record of the hearing; review relevant parts of the video.	0.60	
	AJL	Review hearing video and confer with Attorney Zhivnitskaya regarding considerable errors made by the hearing officer; draft substantive correspondence to Mayor Donahue regarding option to appeal and errors made by Ms. Goldman in the protest hearing; options moving forward.	1.20	
05/06/2016	AJL	NO CHARGE: Review voicemail message from Mr. Donahue indicating he does not want to continue fighting and is ready to move toward the recall election; draft response and note of appreciation regarding same.	0.80	
		For Current Services Rendered	7.10	1,402.50

Professional Summary

Timekeeper	Hours	Rate
Abraham J. Laydon, Esq.	0.80	\$0.00
Abraham J. Laydon, Esq.	4.00	250.00
Olga Zhivnitskaya, Esq.	2.30	175.00

Total Current Work Due 1,402.50

Previous Balance \$11,364.21

Paul Donahue

Recall Protest and Related Negotiations

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May 31, 2016
Account No: 6810-0000M
Statement No: 140870

Balance as of 05/31/2016

\$12,766.71

Please Remit

\$12,766.71

Payments received after the date of this invoice will be reflected on your next statement.

PAYMENT IS DUE OCTOBER 31, 2016

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June 30, 2016

Account No: 6810-0000M
Statement No: 142813

Recall Protest and Related Negotiations

Previous Balance	\$12,766.71
<u>Payments Received through 06/30/2016</u>	
Total Payments for 06/03/2016	-5,000.00
Finance Charge	3.14
<u>Balance as of 06/30/2016</u>	<u>\$7,769.85</u>
Please Remit	<u>\$7,769.85</u>

Payments received after the date of this invoice will be reflected on your next statement.

PAYMENT IS DUE OCTOBER 31, 2016

Please include account # on payment.

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July 31, 2016

Account No: 6810-0000M
Statement No: 144748

Recall Protest and Related Negotiations

Previous Balance	\$7,769.85
<u>Payments Received through 07/31/2016</u>	
Total Payments for 07/05/2016	-1,000.00
Total Payments for 07/27/2016	-1,000.00
Total Payments	-2,000.00
Finance Charge	67.41
<u>Balance as of 07/31/2016</u>	<u>\$5,837.26</u>
Please Remit	<u>\$5,837.26</u>

Payments received after the date of this invoice will be reflected on your next statement.

PAYMENT IS DUE OCTOBER 31, 2016

Please include account # on payment.

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August 31, 2016

Account No: 6810-0000M

Statement No: 145917

Recall Protest and Related Negotiations

Previous Balance	\$5,837.26
Finance Charge	88.16
<u>Balance as of 08/31/2016</u>	<u>\$5,925.42</u>
Please Remit	<u>\$5,925.42</u>

Payments received after the date of this invoice will be reflected on your next statement.

PAYMENT IS DUE OCTOBER 31, 2016

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September 30, 2016

Account No: 6810-0000M

Statement No: 147555

Recall Protest and Related Negotiations

Previous Balance	\$5,925.42
<u>Payments Received through 09/30/2016</u>	
Total Payments for 09/07/2016	-1,000.00
Finance Charge	70.52
<u>Balance as of 09/30/2016</u>	<u>\$4,995.94</u>
Please Remit	<u>\$4,995.94</u>

Payments received after the date of this invoice will be reflected on your next statement.

PAYMENT IS DUE OCTOBER 31, 2016

Please include account # on payment.

We appreciate the opportunity to serve your legal needs.