

19325  
APR - 7 2015  
DH

### Right to Know Request Document Production – Joshua Prince

- A. Legal Defense Fund Account Screen Print (Produced)
- B. Online Contributions to 3/27/15 (Produced w/ Redactions)
- C. Cash and Check Contributions to 3/27/15 (Produced w/ Redactions)
- D. City of Lancaster Cash Account Fulton Bank (Produced)
- E. January 2015 Solicitor's Invoice (Produced)
- F. February 2015 Solicitor's Invoice (Produced)
- G. Insurance Claim Documentation (Produced)
- H. City emails regarding NRA lawsuit (Produced)
- I. Emails with Travelers regarding coverage of defense of lawsuit (Produced)
- J. Emails regarding Media Communication NRA lawsuit, establishment of legal defense fund, and process to set up communications website, use of funds (Produced w/ Redactions)
- K. Emails regarding Prince Right to Know Request (Produced w/ Redactions)
- L. Emails from Mayor (Withheld and Produced w/ Redactions)

	<b>Document</b>	<b>Date</b>	<b># of Pages</b>	<b>Description of Redaction</b>	<b>Privilege Type</b>
B.	Common Sense Lancaster Defense Fund Online Contributions	3/25/15	3	Name, address and email of contributors	Exempt Under Act
C.	Common Sense Lancaster Cash/Check Contributions	3/25/15	2	Name, address and email of contributors	Exempt Under Act
J.	Email string	1/19/15	2	Name	Exempt Under Act
J.	Email	1/15/15	1	Telephone number	Exempt Under Act
J.	Email String	1/15/15		Contains Account Usernames and/or Passwords	Privacy
J.	Email	1/15/15	1	Telephone number	Exempt Under Act
K.	Email	2/26/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
K.	Email	2/26/15	2	Communications Between Mayor's Office and City Solicitor	Attorney Client
K.	Email	2/26/15	3	Communications Between Mayor's Office and City Solicitor	Attorney Client
K.	Email	3/25/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	3/27/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	3/30/15	2	Communications Between Mayor's Office and City Solicitor	Attorney Client; Exempt Under Act
L.	Email String	3/24/15-3/30/15	5	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	3/30/15	2	Communications Between Mayor and City Solicitor	Attorney Client
L.	Email String	3/24/15-3/27/15	1	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email String	3/24/15-3/26/15	3	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email Attachment	3/24/15	7	Ordinance	Pre-decisional
L.	Email and Attachment	3/20/15	5	Communication between Mayor's Office, Solicitor's office and Assistant Counsel	Work Product and Attorney Client
L.	Email string	2/26/15	2	Communications Between Mayor's Office and City Solicitor	Attorney Client
L.	Email	2/25/15	1	Communications Between Mayor and City Solicitor	Attorney Client

ZIMMERMAN, PFANNEBECKER, NUFFORT & ALBERT  
 22 South Duke Street  
 Lancaster, PA 17602  
 (717) 299-0711  
 Fed. Tax ID #23-1721070

City of Lancaster

MARCH 31, 2015

126408  
 751215 0761

1 1/4% interest per month.

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Date	Initials	Description	Amount
		Co-Counsel	
02/11/15	NLA	Letter to client; letter to opposing counsel; dictate courthouse document; conference in office	1.00
02/11/15	NLA	Revise file document; conference in office; letter to opposing counsel; research	0.80
02/11/15	NLA	Correspond with opposing counsel regarding Motion	0.40
02/11/15	NLA	Letter to opposing counsel	0.20
02/11/15	BNH	Telephone conference with Ed Reagan, Esq	0.20
02/11/15	BNH	Memorandum from NLA	0.20
02/11/15	EJM	Finalize motion for stay and email to opposing counsel; prepare praecipe for business court	0.80
02/12/15	RLP	Review with NLA - emails - Insurance Counsel	0.30
02/12/15	NLA	Conference in office regarding filing; letter to opposing counsel and letter to client	0.60
02/12/15	NLA	Telephone opposing counsel	0.20
02/12/15	BNH	Memorandum from NLA	0.20
02/12/15	EJM	Prepare Motion for Submission to business court Judge	0.50
02/13/15	NLA	Letter to client and Courthouse file document; letter to opposing counsel	0.60
02/13/15	NLA	Telephone opposing counsel; conference in office	0.40
02/13/15	NLA	Telephone Judge and conference in office	0.40
02/13/15	NLA	Conference in office; letter to Co-Counsel	0.40
02/13/15	NLA	Conference in office; telephone conference with Judge; correspond with Co-Counsel and client	1.00
02/13/15	NLA	Conference in office regarding Motion; review opposing counsel Brief	0.70
02/13/15	NLA	Letter to Co-Counsel regarding telephone conference	0.20
02/13/15	BNH	Memorandum from NLA	0.20
02/13/15	BNH	Telephone conference with Mayor Gray	0.20
02/13/15	BNH	Email from Pat Brogan	0.20
02/13/15	BNH	Conference in office with NLA	0.20
02/13/15	BNH	Email from Marty Black	0.20
02/13/15	BNH	Conference in office with NLA	0.20
02/15/15	NLA	Conference in office regarding Brief	0.20

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02/16/15	NLA	Research Notice regarding Government Official	0.40
02/16/15	NLA	Conference in office regarding meeting with client	0.20
02/16/15	NLA	Conference in office; letter to co-counsel	0.40
02/16/15	NLA	Research; letter to opposing counsel	0.50
02/16/15	NLA	Revise Brief	1.00
02/16/15	BNH	Email from Daylin Leach	0.20
02/16/15	BNH	Conference in office with NLA	0.20
02/16/15	BNH	Review correspondence	0.20
02/17/15	NLA	Letter to Co-Counsel	0.20
02/17/15	NLA	Meeting with Co-Counsel	0.60
02/17/15	NLA	Conference in office	0.20
02/17/15	NLA	Revise Notice to Government	0.20
02/17/15	BNH	Conference in office with NLA	0.20
02/17/15	BNH	Review Briefs	1.00
02/17/15	BNH	Conference in office with NLA and Dave MacMaine; conference out of office with Mayor	1.00
02/17/15	EJM	Revise Preliminary Objections and Brief	1.00
02/18/15	NLA	Conference in office regarding filing document	0.20
02/18/15	NLA	Telephone client regarding document	0.30
02/18/15	NLA	Conference in office; review file; letter to client	0.50
02/18/15	BNH	Telephone conference with Bill Chisman of Chester County	0.20
02/18/15	AMB	File management and organization of legal research and ongoing Act 192 litigation in Commonwealth Court	0.70
02/19/15	NLA	Letter to Co-Counsel; conference in office regarding Brief	0.40
02/19/15	FPI	Proof Brief	0.60
02/19/15	BNH	Review correspondence	0.20
02/19/15	BNH	Telephone conference with Shiva Goodman of Lease Fire PA	0.20
02/19/15	BNH	Email from Bill Christman	0.20
02/20/15	RLP	Review Court Order - misc - telephone - rreview with BNH	0.30
02/20/15	NLA	Conference in office regarding official statement	0.40
02/20/15	BNH	Review Order and conference in office with NLA	0.20

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02/20/15	BNH	Dictate email to Mayor	0.20
02/20/15	BNH	Review and revise Brief	1.00
02/20/15	AMB	Conference with BNH; email correspondence to Travellers	0.30
02/22/15	NLA	Letter to Co-Counsel	0.20
02/23/15	RLP	Review, meet with NLA regarding emails - Stay - etc	0.20
02/23/15	RLP	Review Brief, status and misc matters with NLA	0.50
02/23/15	NLA	Telephone opposing counsel; conference; letter to client; research	1.00
02/23/15	NLA	Conference in office regarding Brief and revise Brief	0.40
02/23/15	BNH	Telephone conference with Shira Coldman of Lease Fire PA	0.20
02/23/15	BNH	Correspond with Dave MacMain and NLA	0.20
02/23/15	BNH	Conference in office with NLA	0.20
02/23/15	BNH	Review Order; conference with NLA	0.20
02/23/15	EJM	Revise Brief of Defendants in Support of Preliminary Objections	0.40
02/24/15	NLA	Conference in office regarding filing Brief	0.20
02/24/15	EJM	Revise Brief of Defendants in Support of Preliminary Objections and prepare to file with the court; letter to opposing counsel enclosing court stamped copy of brief;	0.50
02/24/15	EJM	Email copy of Brief to opposing counsel, Mayor Gray and Attorney MacMain	0.50
02/26/15	RLP	Right to Know Requests - review with BNH and NLA - etc	0.30
02/26/15	NLA	Conference in office	0.20
02/26/15	NLA	Conference in office regarding Discovery Document	0.20
02/26/15	BNH	Conference in office with RLP	0.30
02/26/15	BNH	Research Public Records Act Exception	0.20
02/26/15	BNH	Email from Pat Brogan	0.20
02/26/15	BNH	Email and Public Records Request from Patrick	0.20
02/26/15	BNH	Email from Pat Brogan; memorandum to RLP	0.20
02/26/15	BNH	Review correspondence from Shira Goodman	0.20
02/27/15	NLA	Conference regarding official statement and research	0.40
02/27/15	NLA	Letter to co counsel	0.20

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02/27/15	NLA	Conference in office	0.30
02/27/15	BNH	Conference in office with NLA	0.20
02/27/15	BNH	Review and analysis Opinion in Hoover vs. Harrisburg	0.20
02/27/15	BNH	Conference with NLA	0.20
02/27/15	BNH	Memorandum to DNG	0.20
02/27/15	BNH	Conference in office with NLA	0.20

Pfannebecker, R.L.	2.10	262.50
Albert, N.L.	24.60	3,075.00
Frank P. Ippolito	0.60	75.00
Handwerger, B.N.	12.00	1,500.00
Paralegal (EJM)	3.70	351.50
Angela M. Boyle	1.00	95.00

Total Fees	5,359.00
Photocopy, postage, fax and/or long distance	9.68
Total	\$5,368.68