

July 23, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97512452  
Client: 3870  
Matter: 1  
Billing Attorney: JEF

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### INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2020:

**RE: TOMA Integrity Litigation**

Professional Services	\$ 18,789.50
Total Disbursements	<u>    \$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 18,789.50</b>

Retainer Held on Account                      \$ 2,500.00

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

July 23, 2020  
Invoice: 97512452

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/01/20	JEF	Work on discovery response follow up, deposition scheduling; work on mediation scheduling; review materials for response to PIA request on removal petition issues.	.70
6/01/20	LRK	Review discovery needed to answer 6th requests for production; email client.	1.00
6/02/20	JEF	Comment on Flunker PIA response strategy; begin preparation for mediation.	.50
6/02/20	LRK	Review documents responsive to 6th RFPs.	.20
6/03/20	JEF	Work on review of responsive invoice for Flunker PIA request, and approaches to respond to same; emails regarding mediation.	.50
6/03/20	JTB	Phone calls and email correspondence with client regarding proposed mediation.	.50
6/03/20	LRK	Draft responses to 6th requests for production; prepare documents to be produced.	1.00
6/03/20	KWM	Assist with assignment from L. Killeen to bates number additional documents responsive to Sixth Set of Production of documents; email L. Killeen and J. de la Fuente regarding same.	.40
6/04/20	JEF	Work on mediation issues; work on discovery responses; work on follow up approach on Flunker PIA; review draft docket control order; emails with opposing counsel regarding discovery responses.	1.50
6/04/20	JTB	Begin work on supplemental discovery responses; review J. de la Fuente outline of discoverable issues and topics; review of internal files to respond to discovery requests; internal correspondence with J. de la Fuente and A. Cooper regarding same.	2.10
6/04/20	LRK	Finalize and review responses to 6th requests for production.	.60
6/04/20	AAC	Review correspondence from party requesting discoverable documents; search client files for discoverable documents related to rate increase and real estate appraisal; correspondence with J. Brewer regarding strategy.	.70
6/05/20	JEF	Emails regarding discovery and scheduling of same; work on approach to responding to Flunker PIA, including call to client; follow up on potentially responsive documents for supplementing discovery.	1.70
6/05/20	JTB	Continue work in reviewing and compiling documents for supplemental discovery response; review internal files and files provided by client for purposes of same; email correspondence and phone calls with client, S. O'Brien, A. Cooper, and J. de la Fuente regarding same.	2.70
6/05/20	AAC	Review FileDisk index and correspondence with I. Quiroz and R. Yeisley regarding possible paper files; discussion with J. Brewer regarding strategy for managing discovery and compiling discoverable documents.	.50
6/08/20	JEF	Work on discovery responses, including gathering additional documents; confer with T. Brewer regarding same; emails with co-defendant counsel regarding depositions and possible expert needed; emails with opposing counsel regarding depositions.	1.20
6/08/20	JTB	Continue document review and preparation for supplemental discovery response; conference call with J. de la Fuente and A. Cooper regarding same.	1.40

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

July 23, 2020  
Invoice: 97512452

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/08/20	AAC	Create index of discoverable documents based on discussions with J. Brewer and J. de la Fuente; participate in team conference call with J. Brewer and J. de la Fuente regarding discovery matters; compile potential discoverable documents and forward to J. Brewer.	3.50
6/09/20	JEF	Follow up call with T. Brewer and client contact on documents for discovery responses; review new incoming documents; review additional Flunker PIA and work on strategy to respond to same; emails with counsel for directors regarding additional case information; work on mediation form.	1.70
6/09/20	JTB	Continue work supplemental discovery response; conference call with J. de la Fuente and D. Taylor regarding same; email correspondence with A. Cooper regarding same; review of additional documents provided by client to determine responsiveness; review correspondence and documents from S. O'Brien.	2.10
6/09/20	AAC	Continue work on index of discoverable documents; cross check index with documents produced during previous rounds of discovery; email J. Brewer regarding same.	1.50
6/10/20	JEF	Review additional documents for discovery; review responsive information for new Flunker PIA request; review additional responsive facts for discovery; follow up emails with all parties on discovery and mediation; review additional emails regarding Flunker PIA.	1.40
6/10/20	JTB	Review additional documents forward from client for response to discovery requests; email correspondence with clients regarding same; phone call with D. Taylor regarding same; email correspondence with D. Norton regarding possible possession of responsive client documents.	1.80
6/10/20	AAC	Review additional documents from D. Taylor and update index of discoverable documents; email J. Brewer regarding same.	.50
6/11/20	JEF	Review documents potentially responsive to Flunker PIA, and prepare response to same; revise mediation form.	.70
6/12/20	JEF	Follow up on communications with requestor regarding Flunker PIA request; emails regarding deposition dates and requests; emails regarding protective order; review information regarding mitigation of site.	.80
6/14/20	JTB	Review documents forwarded from client as potentially responsive to pending discovery requests.	1.20
6/15/20	JEF	Review emails with additional case documents; prepare plan for discovery responses and possible mediation path; review correspondence regarding insurance claim; finalize production; review emails regarding deposition approach; emails regarding insurance claim.	1.60
6/15/20	JTB	Coordination call with J. de la Fuente and A. Cooper to discuss latest round of documents for production; phone call with D. Taylor to discuss additional potentially responsive documents to pending discovery requests; email correspondence and phone call with J. Gimenez regarding client files at water treatment plant and whether same could include potentially responsive documents.	1.80
6/15/20	KWM	Respond to email assignment to assist with Bates Numbering WOWSC's Seventh	.60

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

July 23, 2020  
Invoice: 97512452

Date	Atty	Description Of Services Rendered	Hours
		set of Production of Documents; email J. de la Fuente, T. Brewer and A. Cooper regarding same.	
6/15/20	AAC	Review additional discoverable documents provided from client files and update index of discovery documents; review documents previously produced and email J. Brewer regarding same; phone call with J. Brewer and J. de la Fuente regarding same.	1.80
6/16/20	JEF	Follow up on discovery with counsel for directors; prepare for and conduct executive session briefing on all litigation matters, including upcoming mediation; email from mediator.	1.80
6/16/20	JTB	Internal email correspondence and emails with clients regarding issues raised in review of latest documents received from client; review documents forwarded by client for purposes of same.	1.20
6/17/20	JEF	Review comments from board meeting; emails with mediator regarding mediation and settlement issues and questions; review emails among counsel regarding discovery issues; review incoming deposition notices and begin work on response to same.	1.30
6/17/20	LRK	Review updated filings in matter.	.30
6/18/20	JEF	Emails with counsel for directors regarding mediation; work on strategy for motion to quash deposition, email with client to discuss same.	.50
6/18/20	LRK	Begin drafting motion to quash Plaintiff's amended notice to corporate representative deposition.	3.10
6/19/20	JEF	Review additional issues for potential production; email and calls with mediator for next steps; emails with counsel for directors regarding videos; review correspondence regarding litigation; review additional documents for production; work on approach for motion for protection; review PIA litigation proposed judgment and approve same; work on motion to quash deposition.	1.30
6/19/20	JTB	Phone call with D. Taylor regarding discovery documents and related; review of additional appraisal, property, and budgetary/financial documents provided by client; review of outline of Chapter 22 ratification memo; draft updates to same; review Chapter 22 of Business Organizations Code for purposes of same and particularly to outline and address proper procedure for ratification of corporate acts at issue in current pleading; review Plaintiffs' correspondence to County Sheriff containing numerous criminal allegations against current and former Board members; internal correspondence regarding same.	3.50
6/19/20	LRK	Draft declaration for use in motion to quash; get signed by client.	.70
6/22/20	JEF	Finalize and file motion to quash; emails with opposing counsel and co-defendants regarding same, and letter to all residents; emails with clients regarding same; call with client contact regarding mediation attendance; work on mediation statement; work on approach for additional production.	2.80
6/22/20	JTB	Phone calls with clients and J. de la Fuente regarding upcoming mediation; review and organize additional discovery documents provided by client; phone calls with client regarding same.	1.60

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
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I.D.3870-1-JEF

July 23, 2020  
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<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/22/20	LRK	Finalize and file motion to quash corporate representative deposition.	.60
6/22/20	AAC	Review additional discoverable documents from D. Taylor and P. Mulligan and create new index of additional supplemental discovery documents; email J. Brewer regarding same.	2.00
6/23/20	JEF	Finalize and send mediation statement to mediator; confer with co-defendants' counsel regarding discovery, and pick up additional documents for production.	1.60
6/23/20	JTB	Phone calls with D. Taylor regarding discovery documents and other matters relevant to litigation; review statement to mediator; review discovery index file and zip drive prepared by A. Cooper.	1.40
6/23/20	AAC	Update index of additional discoverable documents provided by D. Taylor and other directors; compare documents with files that have already been produced and email J. Brewer and J. de la Fuente regarding same; prepare documents for production.	1.00
6/24/20	JEF	Work with mediator on prep for mediation, including preparation for Zoom, and discussion of possible paths; work with client representatives regarding same; review email from AG regarding PIA suit; emails regarding protective order.	2.10
6/25/20	JEF	Review email regarding soil sample results; prepare for and conduct mediation, including follow up communications regarding same.	5.60
6/26/20	JEF	Follow up on materials to continue mediation.	.30
6/26/20	JTB	Review and gather relevant portions of WOWSC insurance policies for director coverage following mediation developments; internal email correspondence regarding same; continue review and update of Chapter 22 ratification memo and considerations.	1.80
6/29/20	JEF	Review insurance documents and send same to opposing counsel for mediation; email with counsel for directors regarding same.	.40
6/30/20	JEF	Review order from court requesting status conference.	.20

**TOTAL PROFESSIONAL SERVICES \$ 18,789.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	30.20	300.00	9,060.00
J Troupe Brewer	Principal	23.10	270.00	6,237.00
Lindsay R Killeen	Associate	7.50	240.00	1,800.00
Karen W Mallios	Litigation Support Specia	1.00	140.00	140.00
Audrey A Cooper	Paralegal	11.50	135.00	1,552.50
<b>TOTALS</b>		<b>73.30</b>		<b>\$ 18,789.50</b>

**TOTAL THIS INVOICE \$ 18,789.50**

August 24, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97513408  
Client: 3870  
Matter: 1  
Billing Attorney: JEF

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### INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2020:

**RE: TOMA Integrity Litigation**

Professional Services	\$ 2,863.50
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 2,863.50</b>

Retainer Held on Account \$ 2,500.00

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

August 24, 2020  
Invoice: 97513408

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
7/01/20	JEF	Review and comment on PUC materials related to litigation; work on mediation recap to client; work on strategy to PIA response to Flunker.	.90
7/01/20	JTB	Email correspondence with representative for client insurance carrier; review current policy provided by same to find public officials coverage terms and send same to J. de la Fuente.	.40
7/02/20	JEF	Review PUC list of issues for relationship to litigation.	.20
7/03/20	JEF	Finalize and send mediation update to client.	.30
7/07/20	JEF	Review proposed status update and comment on same.	.30
7/09/20	JEF	Confer with opposing counsel regarding status report and settlement progress issues; follow up on status report issues in light of same.	.60
7/10/20	JEF	Work on revised status report, including multiple additional revisions before approving same for filing.	.50
7/13/20	JEF	Emails with counsel regarding depositions and document discovery; work on motion for protection issues; work on additional document production.	.70
7/13/20	JTB	Review Joint Status Report and Special Exceptions filed by Friendship Homes and Hangars; review latest request for discovery documents from K. Allen; internal correspondence regarding same; review outline of documents provided by A. Cooper.	1.20
7/13/20	AAC	Review correspondence from K. Allen requesting additional discovery documents related to client budget; review documents from D. Taylor and create index of documents to be produced; email J. Brewer regarding same.	1.40
7/14/20	JEF	Prepare for director deposition; review emails regarding motion for protection; review email containing additional WSC information regarding litigation.	1.30
7/14/20	KWM	Prepare and bates number additional documents identified by Lloyd Gosselink team for production to opposing counsel; email regarding same.	.60
7/14/20	AAC	Coordinate with K. Mallios to bates number and prepare documents for production; email J. Brewer and J. de la Fuente regarding same.	.50
7/15/20	JEF	Review additional email and update on protective order plan and issues.	.20
7/15/20	LRK	Review case updates; joint status report; PIA intervention status and updated discovery production.	.50
7/17/20	JEF	Emails regarding deposition scheduling.	.20
7/20/20	JEF	Work on scheduling hearings and related matters in both Ffrench litigation and PIA litigation.	.40
7/21/20	JTB	Phone call with client regarding status of litigation including mediation path forward and filing deadlines for Plaintiffs and WSC response thereto.	.30
7/27/20	JEF	Review response to motion for protective order, and share comments on same with co-defendants counsel.	.40
7/31/20	JEF	Work with counsel for directors regarding motion for protection; review correspondence from court regarding same.	.30

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

August 24, 2020  
Invoice: 97513408

**TOTAL PROFESSIONAL SERVICES** **\$ 2,863.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	6.30	300.00	1,890.00
J Troupe Brewer	Principal	1.90	270.00	513.00
Lindsay R Killeen	Associate	.50	240.00	120.00
Karen W Mallios	Litigation Support Specia	.60	140.00	84.00
Audrey A Cooper	Paralegal	1.90	135.00	256.50
<b>TOTALS</b>		<b>11.20</b>		<b>\$ 2,863.50</b>

**TOTAL THIS INVOICE** **\$ 2,863.50**

**ENOCH KEVER PLLC**  
7600 N. Capital of Texas Hwy  
Building B, Suite 200  
Austin, TX 78731  
(512) 615-1210  
Tax I.D. Number: 27-4508316

July 31, 2020

Joseph J. Gimenez III  
Windermere Oaks Water Supply Corporation  
424 Coventry Road  
Spicewood, Texas 78669

Invoice No.: 11475  
Client No.: 19062  
Matter No.: 00001  
Bill Through: 07/31/2020

Re: Land Sale Litigation

Balance of invoice dated: 06/30/2020	\$33,249.84
Net Balance Forward	\$33,249.84

PROFESSIONAL SERVICES

07/01/2020	SLO	Coordinate with court reporter regarding upcoming remote depositions; confer with clients (Bill Earnest and Pat Mulligan) regarding same; telephone calls with Dorothy Taylor and Joe Gimenez regarding mediation and status of case; confer with Bob Mebane regarding same.	1.30 hrs
07/01/2020	LL	Review order of the court.	0.20 hrs
07/02/2020	SLO	Confer with opposing counsel regarding potential protective order; confer with clients and court reporter regarding testing technology for upcoming remote depositions.	0.80 hrs
07/03/2020	SLO	Confer with Dorothy Taylor; confer with opposing counsel regarding protective order.	0.20 hrs
07/08/2020	SLO	Review proposed status report and confer with defense counsel regarding same.	0.30 hrs
07/09/2020	SLO	Confer with other counsel regarding status report requested by the court.	0.40 hrs
07/10/2020	SLO	Prepare for defending Pat Mulligan's deposition and for meeting with P. Mulligan; review and comment on final version of joint status report and confer with counsel regarding same.	1.50 hrs
07/13/2020	SLO	Review multiple email communications from clients and opposing counsel and respond to same; prepare for deposition with Pat Mulligan; telephone call with Dorothy Taylor.	3.50 hrs
07/13/2020	LL	Review YouTube channel and take screen shots of comments; review joint status report and calendar deadlines.	0.90 hrs
07/14/2020	SLO	Prepare for deposition with Bill Earnest; prepare for deposition with Pat Mulligan; confer with court reporter regarding depositions; revise motion for protective order and protective order in light of new threats; confer with clients regarding same.	3.80 hrs

07/15/2020	SLO	Confer with client (David Bertino) regarding motion for protective order; confer with defense counsel regarding same; locate and send documents to Pat Mulligan in relation to deposition; confer with opposing counsel regarding upcoming deposition.	1.10 hrs
07/16/2020	SLO	Proofread and finalize motion for protective order for filing.	0.50 hrs
07/17/2020	SLO	Confer with client (Bill Earnest) regarding deposition; finalize and file motion for protective order; multiple conferences with opposing counsel, defense counsel, and clients.	1.50 hrs
07/17/2020	LL	Proofread and revise motion for protection; draft exhibits for same; finalize exhibits; finalize motion for protection; file same.	1.20 hrs
07/20/2020	SLO	Multiple conferences with trial judge, defense counsel, and opposing counsel regarding motion for protective order and potential hearing; prepare potential exhibits for reply in support of motion.	0.90 hrs
07/20/2020	LL	Review Judge Mirabal's emailed orders.	0.20 hrs
07/21/2020	SLO	Review discovery and documents plaintiffs previously produced in case to Friendship Homes and other documents provided by Dana Martin.	3.00 hrs
07/23/2020	LL	Draft vacation letter for Shelby O'Brien; finalize and file same.	0.60 hrs
07/27/2020	MAL	Communication regarding response to motion for protection and preparing reply.	0.30 hrs
07/27/2020	SLO	Review Plaintiffs' response to motion for protective order and confer with clients and counsel for WOWSC regarding same.	0.60 hrs
07/28/2020	MAL	Communication regarding arguments for reply.	0.30 hrs
07/28/2020	SLO	Confer with clients regarding Plaintiffs' response to motion for protective order.	0.20 hrs
07/28/2020	PKL	Receive and review of Plaintiffs' response to motion for protective order; review background facts and Shelby O'Brien's notes on matters to address in reply; review comments on response received from counsel for WOWSC; begin preparing reply to plaintiffs' response.	6.70 hrs
07/29/2020	MAL	Communication with Paula Lear regarding draft reply.	0.10 hrs
07/29/2020	PKL	Review and analysis of law on presumptions in protective orders; finish preparing reply to plaintiffs' response and email to team for review.	7.50 hrs
07/30/2020	MAL	Review and revise reply in support of motion for protection; review motion and response to understand issues for reply.	3.10 hrs
07/30/2020	LL	Review proposed exhibits to reply in support of motion for protection; revise same.	0.80 hrs
07/31/2020	MAL	Assist with finalizing reply.	0.30 hrs
07/31/2020	SLO	Review and revise reply in support of motion for protective order; circulate draft reply to clients; conferences with clients regarding same.	1.70 hrs
07/31/2020	LL	Revise per Shelby O'Brien's instructions exhibits to reply in support of motion for protection; finalize same; review motion cites to exhibits.	1.20 hrs
07/31/2020	PKL	Review and revise reply in support of motion for protective order.	0.50 hrs

Timekeeper Summary

Timekeeper	Hours	Rate	Amount
Lindsey, Laci	5.10 hrs	150.00	\$765.00
Lorber, Melissa A.	4.10 hrs	300.00	\$1,230.00
Lear, Paula K.	14.70 hrs	300.00	\$4,410.00
O'Brien, Shelby	21.30 hrs	300.00	\$6,390.00

Total fees for this matter \$12,795.00

EXPENSES

07/31/2020	Westlaw/Electronic Research	98.82
	Total expenses for this matter	<u>\$98.82</u>

BILLING SUMMARY

TOTAL FEES	\$12,795.00
TOTAL EXPENSES	\$98.82
TOTAL CHARGES FOR THIS INVOICE	<u>\$12,893.82</u>
NET BALANCE FORWARD	\$33,249.84
TOTAL BALANCE NOW DUE	<u><u>\$46,143.66</u></u>

**ENOCH KEVER PLLC**  
7600 N. Capital of Texas Hwy  
Building B, Suite 500  
Austin, TX 78731  
(512) 615-1210  
Tax I.D. Number: 27-4508316

June 30, 2020

Joseph J. Gimenez III  
Windermere Oaks Water Supply Corporation  
424 Coventry Road  
Spicewood, Texas 78669

Invoice No.: 11342  
Client No.: 19062  
Matter No.: 00001  
Bill Through: 06/30/2020

Re: Land Sale Litigation

Balance of invoice dated: 05/31/2020	\$13,374.99
Net Balance Forward	\$13,374.99

PROFESSIONAL SERVICES

06/01/2020	SLO	Confer with Bill Earnest, Dorothy Taylor, and Pat Mulligan about status of case and plaintiffs' request for their depositions.	0.50 hrs
06/03/2020	SLO	Confer with Dorothy Taylor and Bill Earnest regarding requests for their depositions; confer with other counsel regarding depositions.	0.50 hrs
06/04/2020	SLO	Confer with counsel regarding proposed scheduling order and mediation.	0.20 hrs
06/05/2020	SLO	Telephone call with Troupe Brewer regarding documents; confer with each client regarding status of case, trial date, and other matters.	1.50 hrs
06/08/2020	SLO	Multiple conferences with clients and counsel regarding potential trial dates, scheduling order, and depositions.	1.50 hrs
06/09/2020	SLO	Multiple conferences with clients (David Bertino, Dorothy Taylor, Bill Earnest, Pat Mulligan, and Bob Mebane); confer with defense and opposing counsel regarding scheduling order, depositions, and protective order; review previous WOWSC board minutes regarding issues in case.	5.00 hrs
06/10/2020	SLO	Strategize with Gary Zausmer regarding various issues in litigation and expert witnesses; review YouTube's privacy policies; confer with opposing counsel regarding protective order governing discovery and depositions; draft protective order and confer with defense counsel and clients who will be deposed regarding same.	2.10 hrs
06/10/2020	LL	Revise draft motion for protective order.	0.50 hrs
06/10/2020	GEZ	Review case status, issues, potential areas of expert testimony and designations and provide multiple strategic options and recommendations to Shelby O'Brien.	0.70 hrs
06/12/2020	SLO	Draft protective order governing discovery; confer with co-counsel and clients regarding same; confer with opposing counsel regarding depositions.	1.80 hrs

06/15/2020	SLO	Telephone call with Joe Gimenez; telephone call with Dorothy Taylor; confer with opposing counsel regarding protective order.	1.80 hrs
06/16/2020	SLO	Telephone call with Dorothy Taylor regarding deposition and documents; confer with counsel for WOWSC; draft confidential mediation statement.	5.00 hrs
06/17/2020	SLO	Draft mediation statement; confer with clients and co-counsel regarding protective order issues.	2.30 hrs
06/17/2020	LL	Review client files to ensure all items are available for Shelby O'Brien's review.	0.20 hrs
06/18/2020	SLO	Draft mediation statement; review documents sent by clients; confer with clients, including call with Pat Mulligan; confer with defense counsel regarding motion to quash depositions.	6.80 hrs
06/18/2020	LL	Review notice of depositions; calculate associated deadlines.	0.60 hrs
06/18/2020	PKL	Confirm deadline to file a motion to quash deposition notices and for protective order and email Shelby O'Brien regarding same.	0.30 hrs
06/19/2020	SLO	Incorporate clients' comments into draft mediation statement; confer with clients regarding proposed protective order; review letter circulated in community by Plaintiffs regarding clients.	1.40 hrs
06/19/2020	PKL	Review materials pertinent to motion for entry of a protective order governing discovery.	0.80 hrs
06/22/2020	SLO	Draft motion for protective order; telephone calls with Dorothy Taylor regarding WOWSC documents; incorporate final comments, finalize, and email mediation statement and agreement to mediator; email clients regarding upcoming mediation; confer with mediator and counsel regarding upcoming mediation.	3.50 hrs
06/22/2020	LL	Proofread and cite check mediation statement; redline suggested changes.	1.30 hrs
06/22/2020	PKL	Review and analyze law on deposition testimony as public court records; review article on public postings of deposition testimony; prepare motion for entry of protective order and revise proposed protective order; email same to Shelby O'Brien for review. (2.0 hr. N/C)	5.00 hrs
06/23/2020	SLO	Draft motion for protective order; meeting with Dorothy Taylor regarding documents; meeting with Joe de la Fuente.	3.00 hrs
06/24/2020	SLO	Draft motion for protective order and assemble exhibits; confer with defense counsel regarding motion; pre-mediation call with mediator and other counsel; confer with clients regarding mediation.	6.60 hrs
06/24/2020	PKL	Review and analyze Burnet County Local Rules and the Texas Disciplinary Rules of Professional Conduct for any governing use of depositions; email Shelby O'Brien regarding same.	0.50 hrs
06/25/2020	SLO	Participate in mediation on behalf of directors; confer with clients regarding mediation.	8.00 hrs
06/25/2020	LL	Proofread and cite check defendant's motion for protective order; redline suggested changes; draft exhibits for same.	2.00 hrs

06/25/2020	PKL	Review and analyze law on invasion of privacy and email Shelby O'Brien regarding same.	1.00 hrs
06/29/2020	SLO	Confer with client David Bertino and his counsel regarding mediation; draft update to director clients regarding the mediation and other matters; answer clients' follow up questions regarding update; amend protective order and circulate to clients.	2.60 hrs
06/30/2020	SLO	Study documents and confer with Joe Gimenez regarding issues in case.	0.50 hrs
06/30/2020	LL	Review order of the court.	0.20 hrs

Timekeeper Summary

Timekeeper	Hours	Rate	Amount
Zausmer, Gary E.	0.70 hrs	300.00	\$210.00
Lindsey, Laci	4.80 hrs	150.00	\$720.00
Lear, Paula K.	7.60 hrs	300.00	\$2,280.00
O'Brien, Shelby	54.60 hrs	300.00	\$16,380.00
			\$19,590.00
Total fees for this matter			

EXPENSES

06/30/2020	Copy Expenses	57.33
06/30/2020	Westlaw/Electronic Research	227.52
Total expenses for this matter		\$284.85

BILLING SUMMARY

TOTAL FEES	\$19,590.00
TOTAL EXPENSES	\$284.85
TOTAL CHARGES FOR THIS INVOICE	\$19,874.85
NET BALANCE FORWARD	\$13,374.99
TOTAL BALANCE NOW DUE	\$33,249.84

August 24, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97513690  
Client: 3870  
Matter: 0  
Billing Attorney: JTB

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### INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2020:

**RE: General Counsel**

Professional Services	\$ 10,229.00
Total Disbursements	<u>          \$.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 10,229.00</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-JTB

August 24, 2020  
Invoice: 97513690

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
7/01/20	JTB	Review J. Gimenez revisions to Grissom settlement; phone call to discuss same; review draft response to P. Flunker PIA request; email correspondence with client and J. de la Fuente regarding same.	1.20
7/02/20	JTB	Review draft Board email regarding mediation update; draft revisions thereto.	.50
7/03/20	JTB	Finalize and send Board email to provide recap of mediation and update on path forward; email correspondence with J. de la Fuente regarding same; review email correspondence from D. Flunker to board member.	.50
7/06/20	JTB	Review latest PIA request from M. Christensen; review Water Code and Non-Profit Act provisions regarding member access to financial records; email correspondence with client regarding same.	1.10
7/06/20	AAC	Calendar 10 business day deadline for June 29th public information act request; case management; calendar 10 business day deadline for July 3rd public information act request.	.30
7/07/20	JTB	Review documents from Spicewood Airport Pilots Association regarding fencing along easement and alleged encroachment of WSC easement by neighboring property owner; phone call with client regarding same; email correspondence with client and client CPA regarding pending PIA requests and responsive documents.	1.70
7/10/20	JTB	Phone call with SAPA legal counsel; review map and other documents provided by SAPA legal counsel regarding potential encroachment upon WSC easement; email correspondence with J. de la Fuente regarding same and path forward for client; phone call with client regarding same.	1.60
7/13/20	JTB	Review client correspondence regarding threats and member communication from D. Flunker regarding invalidity of Piper lane transaction; internal correspondence regarding same and potential response; review correspondence from WSC CPA and documents provided by same; review correspondence from SAPA legal counsel to WSC Board President regarding potential issue with encroachment upon WOWSC easement and other documentation related to same.	2.00
7/14/20	JEF	Review emails from AG regarding intervention in PIA matter; review plea in intervention and motion for discovery, and work on strategy for response to same; update PUC litigation counsel on litigation issues; finalize production of WSC documents.	1.30
7/14/20	JTB	Review D. Flunker Motion to Intervene to contest settlement agreement between WOWSC and the Attorney General; internal correspondence and correspondence with client regarding same; review P. Flunker reply to J. Gimenez response to P. Flunker PIA request; review Open Records Decision cited by P. Flunker regarding same; correspondence with client and J. de la Fuente regarding path forward.	1.50
7/14/20	AAC	Case management.	.20
7/15/20	JEF	Work with staff on deadlines and response strategy for motion; emails with opposing counsel regarding same; review update from AG on second PIA opinion request.	.70

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-JTB

August 24, 2020  
Invoice: 97513690

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
7/15/20	JTB	Review AG ruling on D. Flunker open records decision request; review AG authorized redactions of responsive information; internal correspondence regarding same; email to client regarding same and relaying counsel on path forward; review draft correspondence to membership in response to D. Flunker email alleging impropriety regarding the conveyance of the Piper Lane tract.	1.50
7/15/20	LRK	Review motions needed for upcoming intervention hearing for PIA case; identify case law focus and plan litigation strategy.	1.00
7/15/20	AAC	Calendar 10 business day response deadline for P. Flunker public information act request; case management; review letter ruling from the Attorney General Open Records Division; review and compare AG decision to 2019 decision regarding attorney invoices and email J. Brewer regarding same; calendar deadline for appeal.	1.10
7/16/20	AAC	Discussion with J. Brewer regarding next steps on AG ruling on PIA request for legal bills; review redactions recommended by AG's Office and redact legal bills accordingly; case management.	1.20
7/20/20	LRK	Review relevant case law for upcoming reply motion for PIA case.	1.70
7/21/20	JEF	Review documents and plan for PIA response; emails with opposing counsel regarding scheduling hearing in PIA litigation.	.50
7/21/20	JTB	Finalize redactions on responsive documents to be released to requestor; internal email correspondence and correspondence with client regarding same; review documents and information regarding P. Flunker PIA request; email correspondence with client regarding same.	.90
7/21/20	LRK	Review plea in intervention and assign research to clerk.	.90
7/21/20	AAC	Case management.	.40
7/27/20	JTB	Email correspondence with J. Gimenez regarding P. Flunker PIA request for summarized information; email correspondence regarding CoBank loan documents and review same in preparation for conference call with finance subcommittee.	.80
7/28/20	JTB	Review documents from client in preparation for conference call with finance subcommittee to discuss CoBank loans; conference call to discuss same and other client business.	1.10
7/29/20	JTB	Review and edit response to P. Flunker for PIA request regarding amounts billed for various legal matters; correspondence with J. Gimenez and Board members regarding same.	.40
7/29/20	LRK	Review case law research from clerk for use in upcoming response motion.	.70
7/30/20	LRK	Draft reply motion to request for intervention to prevent requested discovery by intervenor.	5.10
7/31/20	JEF	Email with L. Killeen regarding upcoming hearing on PIA discovery and approach for same.	.20
7/31/20	LRK	Draft reply motion to request for intervention to prevent requested discovery by intervenor.	7.50
7/31/20	LCL	Monthly law clerk time.	8.50

**TOTAL PROFESSIONAL SERVICES**

**\$ 10,229.00**

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-JTB

August 24, 2020  
Invoice: 97513690

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	2.70	300.00	810.00
J Troupe Brewer	Principal	14.80	270.00	3,996.00
Lindsay R Killeen	Associate	16.90	240.00	4,056.00
Audrey A Cooper	Paralegal	3.20	135.00	432.00
Law Clerk	Law Clerk	8.50	110.00	935.00
<b>TOTALS</b>		<b>46.10</b>		<b>\$ 10,229.00</b>

**TOTAL THIS INVOICE \$ 10,229.00**

September 30, 2019

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97503797  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through August 31, 2019:

**RE: General Counsel**

Professional Services	\$ 8,123.00
Total Disbursements	<u>\$ 16.60</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 8,139.60</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

September 30, 2019  
Invoice: 97503797

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
8/01/19	MAG	Review and follow up regarding TPIA request; respond to and work on client's request regarding tax exempt election/status.	.50
8/01/19	JTB	Review new Flunker PIA request; review relevant provisions of Public Information Act regarding records held by third party contractors; draft email to client to relay findings and recommend path forward; review Comptroller database regarding tax exempt entities; review information on application process and eligibility for same; draft email to client to relay findings.	2.50
8/01/19	HEG	Review and calendar new TPIA request; case management.	.60
8/02/19	JTB	Continued work on Conflicts of Interest and Ethics policy.	1.50
8/05/19	MAG	Work on pending TPIA request and instructions and guidance to T. Brewer regarding same.	.20
8/05/19	JTB	Review and respond to Board President correspondence; review letter sent to WSC members by plaintiffs in suit vs client; finalize Conflict of Interest policy; review latest D. Flunker PIA request and review internal firm correspondence to locate potentially responsive documents; review of SAPA contract with WOWSC.	2.80
8/06/19	JEF	Assist with response to PIA request.	.20
8/08/19	MAG	Work with client regarding Flunker requests and issues; work on correspondence; telephone call with client; review incoming filings.	.90
8/08/19	JEF	Email with opposing counsel regarding substitution; review possible draft correspondence and comment on same.	.30
8/08/19	JTB	Continue work on ethics and conflicts of interest policy; review letter to TRWA general counsel requesting assistance; correspondence with client regarding same.	2.00
8/08/19	JTB	No Charge - Continue work on ethics and conflicts of interest policy; review letter to TRWA general counsel requesting assistance; correspondence with client regarding same.	.40
8/08/19	SPA	Office conference with T. Brewer regarding PIA.	.20
8/09/19	MAG	Review loan docs from CoBank; instructions and guidance to T. Brewer regarding same; telephone call with client; work on Flunker correspondence with client.	1.20
8/09/19	JEF	Follow up on proposed communication to TRWA.	.20
8/12/19	JTB	No Charge - Review draft email to TRWA general counsel.	.60
8/14/19	JTB	Finalize conflicts of interest and ethics policy; send same to Board president for review.	1.90
8/15/19	MAG	Follow up regarding client correspondence and pending requests from Flunkers.	.20
8/15/19	JEF	Review draft correspondence to TRWA, and review agenda issues regarding customer letter, and comment on same.	.50
8/15/19	JTB	Phone call with client to discuss ethics and conflicts policy and other outstanding items; revisions to policy following client input; review and work on agenda for upcoming Board meeting; review email to TRWA and attached documents.	2.50
8/15/19	JTB	No Charge - Phone call with client to discuss ethics and conflicts policy and other	.30

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

September 30, 2019  
Invoice: 97503797

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		outstanding items; revisions to policy following client input; review and work on agenda for upcoming Board meeting; review email to TRWA and attached documents.	
8/16/19	MAG	Work regarding CoBank loan documents and required resolution and legal opinion.	.40
8/16/19	JEF	Review response to PIA briefing and invoices to advise client as to next steps.	.40
8/16/19	JTB	Review CoBank Loan documents; discuss same with M. Gershon; review AG decision on Flunker PIA request over invoices; review AG redactions on responsive documents to determine if appeal is necessary; confer with J. de la Fuente and M. Gershon regarding same.	2.80
8/16/19	JTB	No Charge - Review CoBank Loan documents; discuss same with M. Gershon; review AG decision on Flunker PIA request over invoices; review AG redactions on responsive documents to determine if appeal is necessary; confer with J. de la Fuente and M. Gershon regarding same.	2.80
8/19/19	JTB	Finalize SAPA Agreement review and revisions; review board materials for upcoming board meeting.	3.30
8/20/19	MAG	Review and follow up regarding litigation, pending TPIA request.	.10
8/20/19	JTB	Phone call with Board President to discuss upcoming Board meeting and agenda, various assignments and work product, and other WSC action items.	.70
8/22/19	JTB	Review AG correspondence with client regarding D. Flunker compliant; discussion with client regarding same and path forward.	.80
8/23/19	JTB	Review latest PIA request and related correspondence.	.70
8/26/19	MAG	Review and instructions to T. Brewer regarding new TPIA matter regarding D. Flunker.	.10
8/28/19	JTB	Review agenda for upcoming Special Meeting; email correspondence regarding same; review additional correspondence with insurance company found by client in file review; discussion with client on path forward to supplement previous response to PIA request.	1.20
8/28/19	AAC	Monthly case management.	2.30

**TOTAL PROFESSIONAL SERVICES**

**\$ 8,123.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>	<b>N/C Hr</b>	<b>N/C \$</b>
Michael A Gershon	Principal	300.00	3.60	1,080.00	.00	.00
Jose E de la Fuente	Principal	300.00	1.60	480.00	.00	.00
Stefanie P Albright	Principal	285.00	.20	57.00	.00	.00
J Troupe Brewer	Associate	270.00	22.70	6,129.00	4.10	1,107.00
Hannah E Ging	Paralegal	130.00	.60	78.00	.00	.00
Audrey A Cooper	Paralegal	130.00	2.30	299.00	.00	.00
<b>TOTALS</b>			<b>31.00</b>	<b>\$ 8,123.00</b>	<b>4.10</b>	<b>\$ 1,107.00</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

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Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

September 30, 2019  
Invoice: 97503797

**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
	Color Prints	16.00
	Photocopying	.60

**TOTAL DISBURSEMENTS** **\$ 16.60**

**TOTAL THIS INVOICE** **\$ 8,139.60**

October 31, 2019

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97504693  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through September 30, 2019:

**RE: General Counsel**

Professional Services	\$ 5,865.00
Total Disbursements	<u>    \$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 5,865.00</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

October 31, 2019  
Invoice: 97504693

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
9/03/19	JTB	Revise Draft Agreement with SAPA following direction from general manager and Board president.	2.40
9/04/19	JTB	Continue work to revise and finalize SAPA agreement.	1.40
9/05/19	JTB	Finalize second round of SAPA agreement edits; email correspondence with client regarding same.	1.80
9/06/19	JTB	Review correspondence from client regarding HB 2840 and alleged non-compliance; review bill and existing client agenda documents and policies regarding same.	1.60
9/09/19	MAG	Research Texas Bus Org Code and follow up on client inquiry.	.60
9/09/19	JTB	Internal correspondence regarding potential responsive documents to PIA request.	.40
9/11/19	MAG	Research and work on pending issues regarding property sale and handling of correspondence to customer.	.40
9/11/19	JTB	Review correspondence from members regarding payment to PIO; confer with M. Gershon and J. de la Fuente regarding same; phone call with client regarding same; review WSC policies on reimbursement for expenses incurred.	2.00
9/12/19	JTB	Work session with S. Albright to discuss AG appellate process, timelines, and viability of appeal; confer with J. de la Fuente regarding same; review agenda for upcoming regular and special board meetings; draft appeal of AG ruling; phone call with client to discuss same.	5.20
9/13/19	JTB	Finalize AG Petition draft; correspondence with J. de la Fuente regarding same; review and incorporate J. de la Fuente comments and edits to draft Petition.	2.50
9/16/19	MAG	Review incoming correspondence and follow up with T. Brewer regarding HB 2840.	.10
9/16/19	JTB	Finalize Petition in Travis County District Court; prepare exhibits for same; draft response email to client to outline answers to questions/issues posed.	1.50
9/20/19	JTB	Finalize correspondence to notify requestor of petition challenging AG ruling.	1.00
9/23/19	JTB	Finalize notification letter to D. Flunker; send same.	.70

**TOTAL PROFESSIONAL SERVICES \$ 5,865.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Michael A Gershon	Principal	1.10	300.00	330.00
J Troupe Brewer	Associate	20.50	270.00	5,535.00
<b>TOTALS</b>		<b>21.60</b>		<b>\$ 5,865.00</b>

**TOTAL THIS INVOICE \$ 5,865.00**

November 29, 2019

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97505378  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through October 31, 2019:

**RE: General Counsel**

Professional Services	\$ 15,771.00
Total Disbursements	<u>\$ 11.80</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 15,782.80</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

November 29, 2019  
Invoice: 97505378

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
10/01/19	MAG	Review likely outcomes on appeal of AG's decision and options for client; follow up with T. Brewer regarding client counsel; review D. Flunker's correspondence and client's questions and proposed reply; assist with same.	.70
10/01/19	JEF	Review email and confer with client regarding petition appealing AG ruling; email with client regarding process for next meeting.	.40
10/02/19	JEF	Advise the client on PIA issues; work on agenda issues.	.40
10/02/19	JTB	Phone call with client regarding October 9 meeting and pending action items; confer with J. de la Fuente regarding same; draft statement for Board President to read at upcoming meeting regarding appeal of AG determination.	1.50
10/03/19	MAG	Work on issues to be covered at upcoming Board meeting; edit agenda.	.40
10/03/19	JEF	Work on language for agenda posting.	.20
10/03/19	JTB	Draft revisions to WSC Agenda; confer with M. Gershon and J. de la Fuente regarding same.	.80
10/04/19	JTB	Finalize agenda; email same to client; confer with J. de la Fuente on path forward for upcoming and future meetings and subjects thereof.	.80
10/07/19	MAG	Work on removal issues.	.40
10/07/19	JTB	Review potential responsive documents to latest D. Flunker PIA request; email correspondence with client to provide analysis regarding the responsive nature of documents in question; review bylaws and articles of incorporation regarding right of membership to petition for director removal; work session with M. Gershon to review board statement regarding AG appeal; draft revisions to same.	2.50
10/08/19	MAG	No Charge - Office conference with J. de la Fuente and T. Brewer.	.40
10/08/19	JEF	Work on issues for next meeting agenda, and work on impact of recall petition.	.40
10/08/19	JTB	Work session with M. Gershon and J. de la Fuente regarding upcoming board meetings and petition to remove Board President; review bylaws for purposes of same.	2.10
10/09/19	JEF	Email to client regarding statements and approach for October 26th meeting, and related matters.	.40
10/09/19	JTB	Email correspondence with client, M. Gershon and J. de la Fuente regarding Oct 26th meeting and purpose thereof; review information provided by client regarding director elections and positions; confer with J. de la Fuente regarding same and path forward for client in establishing positions.	2.20
10/10/19	MAG	Respond to telephone call from J. Gimenez regarding petition, TPIA issues, and yesterday's Board meeting; review correspondence and follow up regarding same with T. Brewer.	.80
10/10/19	MAG	Work on removal issues.	.30
10/10/19	JEF	Work on meeting agenda and public statements.	.40
10/10/19	JTB	Review Government Code and PIA Handbook from AG regarding inability of governmental entity to obtain potentially responsive documents; email	3.50

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

November 29, 2019  
Invoice: 97505378

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		correspondence with client regarding removal petition; discussion with J. de la Fuente and M. Gershon regarding same and path forward; review WSC bylaws for purposes of same; draft outline of relevant provisions and considerations for conference call with Board members and to provide guidance on path forward.	
10/11/19	MAG	Close the loop with client on policy issue; review several emails regarding petition and follow up with team.	.30
10/11/19	JEF	Work with client contacts on approach to recall election, and discuss specific requirements of by-laws and other law.	1.00
10/11/19	JTB	Preparation for conference call with client directors regarding membership petition; confer with J. de la Fuente regarding same; participate in call; draft email to follow-up on issues discussed during call.	3.50
10/13/19	MAG	Review and comment on proposed public notice for Board review/action on potential agreement.	.40
10/13/19	JTB	Review draft agenda, draft correspondence to members, and draft term summary for amended and superseding contract; review J. de la Fuente edits to same; make revisions to same and confer with M. Gershon and J. de la Fuente regarding drafts and path forward.	2.00
10/14/19	MAG	Work on agenda, agenda supplement (deal points) and correspondence, and TPIA request received today.	.50
10/15/19	JEF	Finalize agenda and related documents, send same to client; confer with client regarding plan for same.	1.10
10/16/19	JEF	Work on meeting agenda.	.20
10/16/19	JTB	Review petition to remove J. Gimenez filed by WOWSC members; review draft agenda for upcoming meeting and edits thereto; discussion with M. Gershon and J. de la Fuente regarding same and path forward.	1.20
10/17/19	MAG	Review and follow up on D. Flunker correspondence directed to M. Gershon, and other potential liability/coverage issues for Board Member based on threat from D. Flunker.	.20
10/18/19	JEF	Assist with PIA issues.	.20
10/18/19	JTB	Review client correspondence and questions regarding petition for removal and related procedure; discussion with J. de la Fuente regarding same.	.60
10/20/19	MAG	Brief review of client correspondence and petition, and follow up with team regarding same.	.10
10/20/19	JTB	Review email correspondence from board of directors regarding removal petition; review bylaws and statutes regarding same; confer with M. Gershon and J. de la Fuente regarding same.	1.50
10/23/19	JEF	Work on approaches for upcoming meeting; review issues related to petition for removal and special meeting.	.40
10/23/19	JTB	Conference call with client to discuss petition process and procedures as required by bylaws; review bylaws and business organizations code regarding same and membership meetings; draft email relaying research findings for J. de la Fuente and M. Gershon review; continue review and research into Business Organizations	4.70

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

November 29, 2019  
Invoice: 97505378

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		Code following J. de la Fuente review; phone call with J. de la Fuente to discuss same and path forward for client.	
10/24/19	JTB	Phone call with clients; draft letter to J. Fuller; confer with J. de la Fuente regarding same; phone call with L. Killeen to discuss draft Motion for Summary Judgment.	2.00
10/25/19	JEF	Prepare for tomorrow's board meeting.	1.90
10/26/19	JEF	Prepare for and assist with board meeting, travel to and from same.	2.80
10/27/19	MAG	Review today's correspondence from D. Flunker and forward to team.	.10
10/28/19	MAG	Assist with TPIA requests.	.30
10/28/19	JEF	Work on approaches for meeting on recall, and agenda issues; confer with client regarding same; work on summary of meeting communication.	1.10
10/28/19	JTB	Email correspondence with client regarding multiple PIA requests; review of same; work session with J. de la Fuente regarding several action items and assignments for client; preparation for conference call with client; conference call regarding same; review Board President draft letter to membership.	4.50
10/28/19	AAC	Review client by-laws for membership meeting notice requirements and removal notice requirements.	.60
10/29/19	JEF	Review and comment on draft meeting minutes; emails regarding processes and path for upcoming meetings; follow up on correspondence relating to removal petition; review and revise draft member communication.	.60
10/29/19	JTB	Email correspondence re: PIA requests; review previous work product regarding elements of res judicata and potential application to second lawsuit against WOWSC; phone call with board member regarding status of petition proceeding and path forward; finalize and send letter to J. Fuller regarding same.	3.10
10/30/19	JEF	Work on path forward for meetings and recall process.	.40
10/30/19	JTB	Review and edit draft agenda and other items relevant to petition proceeding provided by client; phone call with client regarding same; review bylaws for purposes of same.	1.90
10/31/19	JTB	Review documents potentially responsive to PIA request forwarded from client; email correspondence with client and J. de la Fuente and M. Gershon regarding same.	1.50

**TOTAL PROFESSIONAL SERVICES \$ 15,771.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>	<b>N/C Hr</b>	<b>N/C \$</b>
Michael A Gershon	Principal	300.00	4.50	1,350.00	.40	120.00
Jose E de la Fuente	Principal	300.00	11.90	3,570.00	.00	.00
J Troupe Brewer	Associate	270.00	39.90	10,773.00	.00	.00
Audrey A Cooper	Paralegal	130.00	.60	78.00	.00	.00
<b>TOTALS</b>			<b>56.90</b>	<b>\$ 15,771.00</b>	<b>.40</b>	<b>\$ 120.00</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

November 29, 2019  
Invoice: 97505378

**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
	Photocopying	11.80
<b>TOTAL DISBURSEMENTS</b>		<b>\$ 11.80</b>
<b>TOTAL THIS INVOICE</b>		<b>\$ 15,782.80</b>

December 18, 2019

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97505739  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through November 30, 2019:

**RE: General Counsel**

Professional Services	\$ 17,554.00
Total Disbursements	<u>\$ 25.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 17,579.00</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

December 18, 2019  
Invoice: 97505739

**PROFESSIONAL SERVICES RENDERED**

Date	Atty	Description Of Services Rendered	Hours
11/01/19	JEF	Review issues regarding scheduling member meeting on removal petition, comment on same.	.40
11/02/19	MAG	Respond to telephone calls from Directors regarding removal procedures and M. Zeppa's opinion.	.70
11/04/19	MAG	Review incoming correspondence from P. Flunker; follow up with team regarding same; work on research project to address plaintiff's allegations	.80
11/04/19	JEF	Assist with PIA issues; review issues raised by purported charges not contained in petition; work on approaches for indemnifying former and current directors in compliance with the law.	.80
11/04/19	JTB	Assist client in reviewing potentially responsive documents and responding to PIA requests; review bylaws regarding procedures related to removal petition and statement of charges against director sought to be removed.	1.80
11/05/19	MAG	Respond to telephone call from client Director; follow up with team regarding same--specifically bylaws and procedure with recall election.	.40
11/05/19	JTB	Phone call with client to discuss PIA requests and petition hearing; confer with M. Gershon and J. de la Fuente regarding same.	.90
11/06/19	MAG	Conference call with team regarding next steps on recall petition.	.70
11/06/19	JTB	Conference call with M. Gershon J. de la Fuente and L. Killeen to discuss multiple client issues and action items.	1.00
11/07/19	JEF	Emails regarding purported member meeting, and strategy for dealing with same.	.40
11/07/19	JTB	Correspondence with client regarding PIA requests and removal petition procedure; review bylaws for purposes of same; confer with J. de la Fuente on path forward; review of correspondence from members regarding attempt to call special members meeting; phone call with client regarding same.	1.80
11/08/19	MAG	Telephone calls; research of Gov't Code; review file.	2.40
11/08/19	JEF	Review and edit letter regarding membership meeting.	.40
11/08/19	JTB	Continued bylaw and statute review regarding removal petition and voting procedures; phone calls with client regarding same.	.90
11/09/19	MAG	Extended telephone calls with client Directors; follow up with M. Zeppa, then with team.	1.50
11/10/19	JEF	Review analysis of possible path on removal petition meeting and comment on same.	.20
11/11/19	MAG	Prepare Board agenda items; internal discussion; research-; place another call to M. Zeppa; telephone calls with client; work on recall petition issues.	3.20
11/11/19	JEF	Follow up on developments and path for member meeting; work on strategies for proper communication.	.50
11/11/19	JTB	Correspondence with M. Gershon and J. de la Fuente regarding client action items and upcoming Board meeting; review and edit agenda for same; review and finalize correspondence to members regarding removal petition process and path forward.	3.50

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

December 18, 2019  
Invoice: 97505739

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
11/11/19	AAC	Case management.	.20
11/12/19	JEF	Work on PIA issues regarding scope and costs.	.30
11/12/19	JTB	Review correspondence regarding D. Flunker 10/27 PIA request; review applicable provisions of Government Code regarding time limits on responding to requests from individual requests; confer with J. de la Fuente and M. Gershon regarding same; draft email to client regarding same; review additional correspondence from J. Fuller regarding attempted special membership meeting; email correspondence with client regarding applicable provisions in the Bus. Org Code and WSC Bylaws.	1.80
11/12/19	AAC	Case file management.	.10
11/13/19	MAG	Review several emails and proposal for Exec Session.	.40
11/13/19	JEF	Prepare for upcoming board meeting; work on insurance issues; review PIA information.	.70
11/13/19	AAC	Case file management.	.20
11/14/19	MAG	Work with team in preparation for upcoming Board meeting and other action items.	.80
11/14/19	MAG	Work regarding coop/wsc distinction and allegations regarding same in recently filed lawsuit.	2.20
11/14/19	JEF	Work on strategy for member meeting and related issues; review and edit resolution on member meeting.	.40
11/14/19	JTB	Work session with M. Gershon and J. de la Fuente to prepare for client Board meeting; draft resolution for board for upcoming meeting.	3.70
11/15/19	MAG	Review incoming correspondence and follow up regarding same with team.	.40
11/15/19	JEF	Work on post-meeting issues, agenda approach.	.20
11/15/19	JTB	Review Draft agenda; review correspondence to board from J. Fuller regarding removal petition and improperly called special members meeting; discussions with client regarding same.	1.50
11/18/19	JEF	Review discovery issues; coordinate defense matters; work on preparations for depositions; sign protective order on PIA appeal.	.70
11/18/19	JTB	Review and edit documents provided by D. Taylor in preparation for removal petition hearing; phone call with client regarding same.	1.80
11/19/19	MAG	Work with J. de la Fuente regarding allegations in recently filed lawsuit and prep for Board meeting regarding same.	.40
11/19/19	JEF	Work on matters for upcoming board meeting.	.40
11/19/19	JTB	Review email correspondence from petitioners; confer with J. de la Fuente and M. Gershon on path forward; draft documents for upcoming Board meeting; review agenda and other petition proceeding related documents from Board.	1.90
11/19/19	AAC	Case file management.	.20
11/20/19	JEF	Assist with preparation for board meeting; review and edit board correspondence regarding upcoming meeting and litigation; follow up on outcome of meeting.	.80
11/20/19	JTB	Preparation for client Board meeting; prepare resolutions for Board action; review and edit documents provided by client pertaining to member correspondence and the removal petition proceeding; phone call with client regarding same; attend client board meeting; travel to Spicewood for purposes of same.	8.50

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

December 18, 2019  
Invoice: 97505739

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
11/20/19	AAC	Case file management; review correspondence and calendar membership meeting deadlines.	.20
11/21/19	JTB	Phone calls with client regarding action items following board meeting; finalize Board correspondence to members regarding removal petition; work to finalize agenda and notice correspondence regarding December 14th meeting.	2.30
11/21/19	AAC	Case file management.	.10
11/22/19	JTB	Assist D. Taylor finalize correspondence and other documents for petition proceeding; email correspondence regarding same; phone call with B. Earnest regarding analysis of cost of PIA request compliance/fulfillment and assistance; draft email to client regarding same.	2.80
11/22/19	AAC	Case file management; save client documents to DMS file.	.10
11/25/19	JEF	Follow up with client regarding purported meeting on Saturday; work on board communications regarding removal petition meeting, and proper path for communication from J. Gimenez.	.60
11/25/19	JTB	Review draft ballot for removal petition; discussion with client and with J. de la Fuente regarding path forward on proposed correspondence from Director Gimenez to membership regarding charges brought against him; discussion with client regarding same.	1.30
11/25/19	AAC	Case file management; review client correspondence.	.20
11/26/19	JEF	Review agenda and comment on same; review draft letter to members and comment on same, including discussion of hearing procedures.	.80
11/26/19	JTB	Assist client in finalizing member correspondence and other documents encompassing notice for special membership meeting; confer with J. de la Fuente regarding same.	3.50
11/27/19	JTB	Review draft correspondence to membership regarding new public comment policy; review HB 2840 and bill analysis and TRWA correspondence; phone call with client regarding same.	1.50

**TOTAL PROFESSIONAL SERVICES \$ 17,554.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Michael A Gershon	Principal	13.90	300.00	4,170.00
Jose E de la Fuente	Principal	7.60	300.00	2,280.00
J Troupe Brewer	Associate	40.50	270.00	10,935.00
Audrey A Cooper	Paralegal	1.30	130.00	169.00
<b>TOTALS</b>		<b>63.30</b>		<b>\$ 17,554.00</b>

**DISBURSEMENTS**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

December 18, 2019  
Invoice: 97505739

<b>Date</b>	<b>Description</b>	<b>Amount</b>
	Photocopying	25.00

**TOTAL DISBURSEMENTS \$ 25.00**

**TOTAL THIS INVOICE \$ 17,579.00**

January 30, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97506478  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through December 31, 2019:

**RE: General Counsel**

Professional Services	\$ 10,695.50
Total Disbursements	<u>\$ 92.80</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 10,788.30</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

January 30, 2020  
Invoice: 97506478

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
12/02/19	MAG	Review incoming correspondence; work regarding client advisory to new Director.	.40
12/02/19	JEF	Review communication regarding members meeting outcome.	.20
12/02/19	JTB	Review email correspondence regarding attempted special members meeting and voting on removal petition; review statute and bylaws for purposes of same; internal email correspondence regarding same; correspondence with client regarding fulfillment of recent PIA request; finalize correspondence to newest Board members regarding duties and obligations.	1.80
12/02/19	KWM	Review PIA Appeal calendar deadline for Bates Production.	.10
12/02/19	AAC	Case management.	.20
12/03/19	MAG	Review and follow up on incoming correspondence and client action required.	.30
12/04/19	MAG	Review and follow up regarding D. Flunker correspondence.	.20
12/04/19	JEF	Review messages from Flunker re PIA officer and results of meeting.	.20
12/04/19	JTB	Continue work on Presiding Officer hearing script and other preparation for membership meeting.	1.10
12/04/19	AAC	Case management.	.10
12/05/19	DCN	No Charge - Office conference with M. Gershon regarding WSC issues.	.20
12/05/19	JEF	Work on issues regarding upcoming member meeting, and approach for same.	.40
12/05/19	JTB	Review correspondence from client regarding upcoming special membership meeting on removal petition; internal correspondence regarding same and path forward for client; continue work on presiding officer hearing script; work on position paper regarding the lawful payment to PIO for such services; review client Bylaws and Business Organizations Code for purposes of same.	1.70
12/06/19	JTB	Draft hearing script and preparation for membership meeting	3.50
12/07/19	JTB	Work on hearing script for presiding officer and other preparations for special members meeting.	1.50
12/09/19	JEF	Review processes and information for member meeting; review documents to assist with same and edit same.	.80
12/09/19	JTB	Finalize Hearing Script and memo/written statement on interpretation of WOWSC Bylaws and Articles of Incorporation as well as Bus Org and Water Codes regarding payment of PIO for services provided to WSC.	3.20
12/10/19	JTB	Review J. de la Fuente edits to Hearing Script and PIO Salary memo; draft revisions to same.	3.10
12/10/19	AAC	Review Agreed Protective Order from Attorney General PIA appeal; pull, review, and bates number legal invoices for production; draft cover letter; case file management.	1.20
12/11/19	JEF	Work on process and script for upcoming member meeting.	.20
12/11/19	JTB	Phone calls with client regarding upcoming special members meeting and documents regarding same; revisions to documents following client input.	1.70
12/12/19	JTB	Preparation for special members meeting; phone calls with client regarding same;	3.30

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

January 30, 2020  
Invoice: 97506478

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		review bylaws regarding voting list requirements.	
12/13/19	AAC	Case management.	.30
12/14/19	JTB	Attend special members meeting on removal petition for J. Gimenez; preparation for same.	4.50
12/16/19	JEF	Emails regarding holiday schedule, and interaction with PIA obligations.	.50
12/16/19	JTB	Review draft agenda and revisions thereto; draft edits to same; email correspondence with client; draft resolutions for holiday business hours and 2020 director elections.	2.20
12/16/19	AAC	Case management.	.10
12/17/19	JEF	Review updated member communication.	.20
12/17/19	JTB	Work on resolutions for upcoming meeting; call with J. Grissom regarding settlement offer for his claim related to grinder pump; phone calls with client regarding same and recent member actions following recall petition meeting.	2.70
12/17/19	CLT	Research system to locate information regarding unopposed elections and email same to T. Brewer and D. Klein.	1.00
12/18/19	JEF	Review and edit resolution on holidays.	.30
12/18/19	JTB	Draft holiday schedule and dates of closure for corporate business resolution; review AG complaint filed by D. Flunker and related documents; email correspondence with client regarding same.	2.80
12/18/19	AAC	Finalize production documents and cover letter related to PIA lawsuit with the Attorney General's office; email cover letter and production documents to opposing counsel.	.60
12/19/19	JEF	Review plan for member letter and discuss same with client.	.30
12/26/19	JEF	Review member meeting agenda and information, including member letter, and comment on same for proper approach.	.30

**TOTAL PROFESSIONAL SERVICES**

**\$ 10,695.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>	<b>N/C Hr</b>	<b>N/C \$</b>
Michael A Gershon	Principal	300.00	.90	270.00	.00	.00
Duncan C Norton	Principal	.00	.00	.00	.20	80.00
Jose E de la Fuente	Principal	300.00	3.40	1,020.00	.00	.00
J Troupe Brewer	Associate	270.00	33.10	8,937.00	.00	.00
Karen W Mallios	Litigation	135.00	.10	13.50	.00	.00
Christina L Thompson	Paralegal	130.00	1.00	130.00	.00	.00
Audrey A Cooper	Paralegal	130.00	2.50	325.00	.00	.00
<b>TOTALS</b>			<b>41.00</b>	<b>\$ 10,695.50</b>	<b>.20</b>	<b>\$ 80.00</b>

**DISBURSEMENTS**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

January 30, 2020  
Invoice: 97506478

<b>Date</b>	<b>Description</b>	<b>Amount</b>
11/30/19	Thomas Process Check # - 000037851 Thomas Process, Citation of Service, Service on Ken Paxton, Attorney General of State of Texas, Windermere Oaks Water Supply Corporation, 10/3/2019	80.00
	Color Prints	2.00
	Photocopying	10.80

**TOTAL DISBURSEMENTS \$ 92.80**

**TOTAL THIS INVOICE \$ 10,788.30**

February 27, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97507116  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through January 31, 2020:

**RE: General Counsel**

Professional Services	\$ 9,127.00
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 9,127.00</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

February 27, 2020  
Invoice: 97507116

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
1/02/20	MAG	Review correspondence and follow up with J. de la Fuente regarding options.	.30
1/07/20	JTB	Review of client correspondence with TRWA counsel regarding special assessment; review of tariff and Water Code provisions regarding same.	1.30
1/08/20	JTB	Continue review of tariff and PUC regulations regarding rate increase process and requirements for WSC.	1.40
1/10/20	JTB	Conference call with J. de la Fuente and client regarding draft agenda and related issues; review tariff and business organizations code in preparation for same; draft edits to agenda following call.	1.40
1/15/20	JTB	Phone call with client regarding path forward on special assessment and other action items facing board; confer with J. de la Fuente and M. Gershon regarding same; review applicable laws and regulations and TRWA guidance for special assessments; correspondence with J. Smith at TRWA regarding same.	4.00
1/16/20	MAG	No Charge - Office conference with Board agenda.	.20
1/16/20	JEF	Review issues relating to meeting agenda and plan for same.	.20
1/16/20	JTB	Review and revise agenda for upcoming meeting; confer with J. de la Fuente regarding pending client issues; continue research on special assessment and rate increase requirements.	2.30
1/17/20	JEF	Follow up on communications with Attorney General.	.20
1/17/20	JTB	Phone call with J. Smith with TRWA regarding pending issues before WOWSC, path forward, and upcoming meeting with WOWSC manager and Board members; draft outline of guidance for client regarding same.	1.30
1/17/20	AAC	Review and respond to correspondence from Attorney General's Office regarding PIA appeal.	.20
1/20/20	JEF	Review and comment on draft agenda.	.20
1/21/20	JEF	Work on topics to address at executive session.	.30
1/21/20	JTB	Conference call with Board President, Treasurer, Manager and TRWA representative regarding WOWSC financial state and path forward; preparation for same; work session with J. de la Fuente regarding same and addressing other pending client matters.	2.20
1/21/20	AAC	Case file management; review files for correspondence from M. Zeppa.	.20
1/22/20	JTB	Review of WOWSC tariff; review PUC regulations regarding rate approval; phone call with client regarding same.	1.50
1/22/20	AAC	Search client DMS folders for information regarding M. Zeppa's prior correspondence; email litigation team regarding same.	.50
1/23/20	MAG	Work with D. Norton and conference call with G. Burriss and D. Norton regarding decommissioning of old plant and related regulatory compliance liability-limiting options.	.50
1/23/20	JTB	Review Tariff regarding rate amendment process and requirements; review PUC rules regarding WSC tariff revision and required notice; phone call to client	2.30

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

February 27, 2020  
Invoice: 97507116

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		regarding same.	
1/24/20	MAG	Work on litigants' request/demand for opportunity to make PP presentation, in light of new statutory law under Texas Open Meetings Act.	.20
1/24/20	JEF	Review proposed agenda item from plaintiffs and comment on same.	.30
1/24/20	JEF	Follow up with Attorney General on documents.	.30
1/24/20	JTB	Review Chapter 22 of the Business Organizations Code, WOWSC Bylaws, and applicable Attorney General opinions regarding ability of WSC members to demand items be placed on membership meetings.	1.80
1/24/20	JTB	No Charge - Review Chapter 22 of the Business Organizations Code, WOWSC Bylaws, and applicable Attorney General opinions regarding ability of WSC members to demand items be placed on membership meetings.	1.00
1/24/20	AAC	Coordinate with litigation practice group regarding documents for AG appeal; email documents to opposing counsel.	.60
1/27/20	JTB	Review state law and Bylaws and Tariff regarding membership fees and amendment process; draft email to client relaying same and suggested path forward; review draft agenda and edits thereto; confer with J. de la Fuente regarding same.	1.80
1/28/20	JTB	Revise and edit draft agendas for annual member and Director meetings; revisions to member correspondence from litigation subcommittee; confer with J. de la Fuente regarding same; phone calls with client regarding same.	3.40
1/28/20	JTB	No Charge - Revise and edit draft agendas for annual member and director meetings; revisions to member correspondence from litigation subcommittee; confer with J. de la Fuente regarding same; phone calls with client regarding same.	1.00
1/29/20	JEF	Review response regarding agenda items at member meeting.	.30
1/29/20	JTB	Review member correspondence regarding requested agenda item; confer with client and J. de la Fuente regarding same; phone calls with client to discuss member vote and ballots at upcoming meeting.	1.10
1/30/20	JTB	Review client and member correspondence regarding status of lawsuit and claims against WOWSC; confer with J. de la Fuente on appropriate response.	1.30
2/05/20	MAG	Strategy/work session with J. de la Fuente and T. Brewer.	1.00
2/07/20	JEF	Revise and comment on agenda.	.30
2/18/20	JEF	Review invoices and confer with AG regarding same; email to client regarding same.	.50

**TOTAL PROFESSIONAL SERVICES**

**\$ 9,127.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>	<b>N/C Hr</b>	<b>N/C \$</b>
Michael A Gershon	Principal	320.00	2.00	640.00	.20	64.00
Jose E de la Fuente	Principal	320.00	2.60	832.00	.00	.00
J Troupe Brewer	Associate	275.00	27.10	7,452.50	2.00	600.00
Audrey A Cooper	Paralegal	135.00	1.50	202.50	.00	.00

**Lloyd Gosselink Rochelle & Townsend, P.C.**

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Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

February 27, 2020  
Invoice: 97507116

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<b>TOTALS</b>	<b>33.20</b>	<b>\$ 9,127.00</b>	<b>2.20</b>	<b>\$ 664.00</b>
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**TOTAL THIS INVOICE** **\$ 9,127.00**

March 30, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97508229  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through February 29, 2020:

**RE: General Counsel**

Professional Services	\$ 12,163.00
Total Disbursements	<u>          \$.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 12,163.00</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

March 30, 2020  
Invoice: 97508229

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
2/01/20	JTB	Attend WOWSC Annual Members and Directors meetings; travel to and from Spicewood; preparation for same.	5.50
2/03/20	JTB	Review and edit draft correspondence to members regarding rate increase; review WOWSC Tariff regarding required customer notice; confer with client regarding same; review POA architectural requirements regarding issue of compliance for new generator and infrastructure; review of state law and regulations regarding same and required setbacks for such facilities; draft release non admission document for J. Grissom regarding resolution of dispute over grinder pump.	4.10
2/04/20	JTB	Review draft of customer notice regarding rate increase; draft revisions thereto and email same to client for review; phone calls with client regarding same; review J. de la Fuente draft of response points to TOMA integrity email and video; review of Burnet County property records regarding easement recording issue with G. Marwih; review POA architectural guidelines document for purposes of same.	3.80
2/05/20	JTB	Review draft documents provided by client regarding rate increase; phone calls with client regarding same.	1.10
2/06/20	JTB	Continued work on draft member correspondence regarding rate increase; work on response points to TOMA Integrity email to members and associated video; draft email to client regarding same; continued review of POA restrictions and guidelines review regarding WOWSC easement issue; search Burnet County property records for purposes of same.	2.50
2/10/20	JTB	Review insurance counsel proposal and related correspondence from client.	.80
2/10/20	AAC	Case file management; calendar PIA requests for 10 business day deadline.	.20
2/11/20	JEF	Review and edit letter regarding rate change; work on response letter regarding recent plaintiff actions; prepare for upcoming executive session; review items regarding real property analysis.	.80
2/11/20	JTB	Continue work on member correspondence drafts and rate increase resolution; prepare for board meeting; participate in executive session by conference call.	3.50
2/11/20	AAC	Review tariff and bylaws for information regarding rate changes; research chapter 67 of the Texas Water Code for rate change provisions; case file management.	.80
2/12/20	JEF	Follow up on meeting control issues.	.20
2/12/20	JTB	Draft settlement and release document for grinder pump issue; review Texas Government Code provisions and AG opinions regarding intimidating conduct at public meetings under open meetings act; email correspondence and phone calls with client regarding same.	3.40
2/13/20	JEF	Emails with assistant AG regarding potential for settlement.	.20
2/13/20	JTB	Continue work on draft settlement agreement and mutual release.	1.80
2/14/20	JTB	Email correspondence with client regarding pending PIA requests; review requests and potentially responsive documents.	1.40
2/17/20	JTB	Research District documents and applicable law and regulation regarding invalid	2.50

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

March 30, 2020  
Invoice: 97508229

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		memberships and false representation of membership to WSC; phone call with client regarding same and other outstanding WSC action items; work on PUC filing for newly revised tariff.	
2/18/20	JTB	Review, edit, and comment on FAQ document for WOWSC website; phone calls with client regarding same.	1.70
2/18/20	KWM	Office conference with J. de la Fuente regarding PIA request for upcoming phone call with D. Gordon.	.30
2/18/20	AAC	Case file management.	.30
2/19/20	MAG	Work with D. Norton on next steps.	.10
2/19/20	DCN	Work regarding decommissioned wastewater treatment facilities; review and follow up regarding document forward by client.	1.00
2/19/20	AAC	Case file management.	.10
2/20/20	JTB	Continue work on draft settlement and mutual release.	1.20
2/24/20	JTB	Work on chapter 22 ratification outline; continued research on issue of illegal tap and voting without membership;	2.70
2/26/20	JTB	Research regarding open meeting requirements and ability to record private meeting; research Aqua Texas utility rates and issues in light of upcoming meeting between members and Aqua TX.	2.50
2/26/20	AAC	Case file management.	.10
2/27/20	JTB	Phone call with client; search Texas Comptroller online database and Burnet County records regarding Paradise City Holdings, LLC.	1.80

**TOTAL PROFESSIONAL SERVICES \$ 12,163.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Michael A Gershon	Principal	.10	320.00	32.00
Duncan C Norton	Principal	1.00	420.00	420.00
Jose E de la Fuente	Principal	1.20	320.00	384.00
J Troupe Brewer	Principal	40.30	275.00	11,082.50
Karen W Mallios	Litigation Support Specia	.30	140.00	42.00
Audrey A Cooper	Paralegal	1.50	135.00	202.50
<b>TOTALS</b>		<b>44.40</b>		<b>\$ 12,163.00</b>

**TOTAL THIS INVOICE \$ 12,163.00**

April 29, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97509686  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through March 31, 2020:

**RE: General Counsel**

Professional Services	\$ 3,007.50
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 3,007.50</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

April 29, 2020  
Invoice: 97509686

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
3/09/20	JEF	Edit member communication.	.40
3/09/20	JTB	Review client correspondence regarding Aqua Texas meeting and circulating to members third-party information; review and edit to proposed member communication regarding same; research Aqua Texas presence in central Texas.	3.00
3/10/20	JTB	Continue review of draft client correspondence; edits to same and review correspondence regarding same; review documents from previous Board meetings regarding rates and ongoing litigation.	2.50
3/13/20	JEF	Email with client regarding media process.	.30
3/16/20	JTB	Review TOMA integrity Inc information to develop response points; email correspondence with client regarding same.	1.60
3/24/20	JEF	Review proposed briefing schedule, email to client regarding same; email to opposing counsel regarding suggested revisions to same.	.40
3/24/20	JTB	Review proposed Rule 11 Agreement from Attorney General staff; phone call with J. de la Fuente to discuss same and proposed amendments thereto.	.50
3/24/20	CCR	Prepare advisory regarding COVID-19, including agency rule exceptions and recommendations.	1.40
3/27/20	CCR	Update advisory regarding COVID-19, including agency guidelines, rule exceptions and other orders regarding declared state of disaster.	1.00
3/31/20	AAC	Case management.	.10

**TOTAL PROFESSIONAL SERVICES \$ 3,007.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	1.10	320.00	352.00
J Troupe Brewer	Principal	7.60	275.00	2,090.00
Christian Cole Ruiz	Associate	2.40	230.00	552.00
Audrey A Cooper	Paralegal	.10	135.00	13.50
<b>TOTALS</b>		<b>11.20</b>		<b>\$ 3,007.50</b>

**TOTAL THIS INVOICE \$ 3,007.50**

June 25, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97511190  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through May 31, 2020:

**RE: General Counsel**

Professional Services	\$ 15,075.50
Total Disbursements	<u>\$ 20.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 15,095.50</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

June 25, 2020  
Invoice: 97511190

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
5/01/20	JTB	Phone calls with client regarding PUC Appeal, AG suit, upcoming Board meeting, and other recent developments; review PUC Order setting schedule for WOWSC response to appeal; review proposed settlement from AG and additional authorized redactions to legal bills subject of D. Flunker PIA request; confer with J. de la Fuente regarding same and path forward for client.	3.80
5/02/20	JTB	Continue review of proposed additional redactions to be authorized by AG; email correspondence with J. de la Fuente regarding same and recommended path forward for client.	.80
5/04/20	JTB	Finalize 10 day AG notice for request for determination regarding Flunker PIA request for privileged information; review PIA request filed by D. Flunker on 5/4/2020 and client correspondence related to same; review provisions of the Texas Government Code regarding redundant and repetitious requests; draft email to client to advise on path forward.	1.60
5/04/20	JTB	Work on AG brief outline for latest Flunker request; review previous filing for purposes of same; review tariff provisions regarding non-payment of bills following indications from members that such non-payment could be forthcoming.	1.30
5/04/20	AAC	Draft 10 day Office of the Attorney General request for decision on April 24th PIA request from D. Flunker; review and prepare all attachments for filing; forward draft request for decision to J. Brewer.	.80
5/05/20	JTB	Work on Flunker 10 day notification letter to AG; review briefing for previous PIA request for attorney invoices; begin work on brief for current request.	1.80
5/06/20	JTB	Call with D. Taylor and J. Gimenez regarding Monday board meeting by teleconference; draft edits to notice document following same; finalize Flunker 10 day AG notice.	1.60
5/06/20	AAC	Case management.	.20
5/07/20	JEF	Work on draft notice and agenda for executive session items.	.20
5/07/20	JTB	Finalize agenda for upcoming board meeting; phone call with client regarding same; review J. de la Fuente edits to same; review AG e-filing system and finalize notice for request for determination on Flunker 4.24.2020 PIA request; work on brief to AG regarding same.	1.80
5/07/20	AAC	Phone call with Attorney General Open Records Division regarding filing procedure during COVID-19; verify filing method and prepare letter and exhibits for filing; discussion with J. Brewer regarding filing of request for decision and client action items.	1.30
5/08/20	MAG	Follow up on Governor's and PUC's disaster-related orders, WWTP matter, TOMA, and rate matters, and upcoming Board agenda.	.50
5/08/20	JEF	Work on advice to client regarding utility billing dispute issues; work on meeting notice/agenda.	.50
5/08/20	JTB	Multiple calls with client regarding upcoming board meeting by Zoom, agenda for	3.20

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

June 25, 2020  
Invoice: 97511190

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		same, and pending issues and action items; finalize notice and agenda document; internal correspondence regarding same; work session with J. de la Fuente and D. Klein to develop cost estimate and strategy moving forward for PUC rate appeal; ensure filing of AG request for determination for D. Flunker PIA request; work on brief regarding same.	
5/08/20	DJK	Phone conference with T. Brewer and J. de la Fuente regarding case strategy.	.50
5/08/20	CCR	Provide PUC guidance regarding service disconnects under current state of emergency rule exceptions to T. Brewer, J. De la fuente, and M. Gershon.	1.20
5/08/20	AAC	Final substantive review of 10 day Attorney General request for decision filing; e-file request for decision and forward confirmation to J. Brewer; review insurance policy records for client for Directors and Officers coverage.	1.50
5/11/20	JTB	WOWSC Board meeting and Executive Session; preparation for same; work on brief to the OAG regarding D. Flunker PIA request.	4.50
5/12/20	JTB	Work on Flunker 15 Day brief to AG; review Governor's proclamation regarding extension of disaster declaration; email to client regarding same.	1.70
5/13/20	MAG	Address pending TPIA request.	.30
5/13/20	JTB	Continue work on brief to AG regarding D. Flunker PIA request.	1.10
5/13/20	AAC	Pull and review responsive documents for April 24 PIA request from D. Flunker; bates number exhibits and prepare attachments for 15 day Attorney General brief; forward documents to J. Brewer; review correspondence from client regarding May 4 PIA request.	1.80
5/14/20	JTB	Draft and finalize brief to OAG regarding Flunker PIA request for attorney bills; email correspondence with J. de la Fuente and A. Cooper regarding same; prepare same for filing.	3.60
5/15/20	JEF	Work on public information act briefing and potential settlement.	.40
5/15/20	JTB	Assist client in finalizing agenda for upcoming meeting; finalize and file brief with the Attorney General regarding D. Flunker PIA request for invoices for legal services; email correspondence with Requestor, client, J. de la Fuente, and A. Cooper regarding same.	3.50
5/15/20	AAC	Prepare 15 day brief for filing with the Attorney General's Office; pull and label exhibits for filing with brief; substantive review of letter brief in preparation for filing; correspondence with J. Brewer and J. de la Fuente regarding brief; e-file 15 day brief and email confirmation to J. Brewer.	2.60
5/16/20	JTB	Email and phone correspondence with client regarding agenda draft and easement issue; review documents prepared by J. Gimenez for presenting to Board and members at upcoming meeting; correspondence regarding same.	2.00
5/18/20	JEF	Review email on settlement terms.	.20
5/18/20	JTB	Review correspondence from assistant Attorney General regarding proposed settlement and path forward regarding appeal and latest Flunker PIA request implicating related issues; internal correspondence regarding same; preparation for Board meeting by Zoom video conference.	1.20
5/19/20	JTB	Review audio files from 5/11 meeting to assist D. Taylor edit and finalize draft	4.30

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

June 25, 2020  
Invoice: 97511190

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
5/20/20	JTB	minutes; phone call with client regarding same; participate in client zoom meeting and executive session; preparation for same; review P. Flunker PIA request. Phone calls with client to discuss issues following Board meeting; review D. Flunker PIA request; review internal files for responsive documents; internal correspondence regarding same; prepare large file transfer to client of public meeting recordings; email correspondence with client regarding potentially responsive documents; review same; review potentially responsive documents pertaining to P. Flunker request.	2.20
5/20/20	AAC	Review May 20 public information act request from D. Flunker and pull responsive documents; review legal invoices for line entries related to removal petition and email J. Brewer regarding same; review May 19 public information act request from P. Flunker; calendar PIA response deadlines.	1.40
5/21/20	JTB	Review invoices to identify responsive information to D. Flunker 5/20/2020 PIA request; internal correspondence regarding same.	.80
5/22/20	DJK	Phone conference with T. Brewer regarding next steps in defense of rate appeal; follow up phone conference with T. Brewer and J. Mauldin regarding the same and case strategy.	.80
5/26/20	JTB	Review client edits to J. Grissom release; edits and finalize same; review correspondence from plaintiff's attorney regarding D. Flunker allegation related to participating in Zoom board meeting.	1.60
5/28/20	JTB	Review draft member correspondence regarding increased rates, PUC appeal, and member messages sent with recent bills; phone calls with client regarding same.	1.60
5/29/20	JTB	Multiple calls with client regarding member correspondence drafts; work session with A. Cooper to determine responsive elements of LG invoices.	1.70
5/29/20	AAC	Phone call with J. Brewer regarding responsive documents for 5/20 PIA request from D. Flunker; review responsive documents and prepare redactions to invoices; case management.	1.00

**TOTAL PROFESSIONAL SERVICES**

**\$ 15,075.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Michael A Gershon	Principal	.80	320.00	256.00
Jose E de la Fuente	Principal	1.30	300.00	390.00
David J Klein	Principal	1.30	295.00	383.50
J Troupe Brewer	Principal	45.70	270.00	12,339.00
Christian Cole Ruiz	Associate	1.20	230.00	276.00
Audrey A Cooper	Paralegal	10.60	135.00	1,431.00
<b>TOTALS</b>		<b>60.90</b>		<b>\$ 15,075.50</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

June 25, 2020  
Invoice: 97511190

**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
5/08/20	Audrey Cooper Check # - 009907079 Filing Fee E-filing fee for 10-day notice with the Office of the Attorney General.	15.00
5/15/20	Audrey Cooper Check # - 009907079 Filing Fee E-filing fee for 15-day brief with the Office of the Attorney General.	5.00

**TOTAL DISBURSEMENTS** **\$ 20.00**

**TOTAL THIS INVOICE** **\$ 15,095.50**

July 30, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97513244  
Client: 3870  
Matter: 0  
Billing Attorney: MAG

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### INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2020:

**RE: General Counsel**

Professional Services	\$ 7,716.00
Total Disbursements	<u>          \$.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 7,716.00</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

July 30, 2020  
Invoice: 97513244

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/01/20	JTB	Review responsive invoices for D. Flunker PIA request for potential redactions of privileged/non responsive information.	.80
6/01/20	AAC	Redact production documents for 5/20 PIA request and forward finalized documents to J. Brewer.	.60
6/02/20	JTB	Continue review of invoices responsive to D. Flunker request; confer with J. de la Fuente regarding same and scope of releasable and non-privileged information contained therein.	1.20
6/03/20	JTB	Email correspondence regarding latest Flunker PIA request; phone calls with client regarding same; draft response to D. Flunker regarding PIA request; review potentially responsive documents to other items within request; work session with J. de la Fuente regarding same; review D. Flunker response to J. Gimenez correspondence provided responsive documents; discussion with client and J. de la Fuente regarding D. Flunker response and path forward.	1.70
6/04/20	JTB	Review correspondence from D. Flunker regarding pending/new PIA request; discussion with J. de la Fuente and client about response and path forward.	.60
6/08/20	JTB	Review latest PIA request from D. Flunker and responsive documents and information thereto; correspondence with client regarding same; review correspondence from P. Flunker regarding completed PIA request and discussion with client regarding issues raised.	1.30
6/09/20	JTB	Review correspondence sent to customers following statements sent to WSC along with recent bill payments following D. Flunker PIA request for same to G. Wheeler; email and phone discussion with J. Gimenez regarding same; review P. Flunker third PIA request for rate analysis; discussion with client regarding same; coordinate with J. de la Fuente and J. Gimenez to develop proper response.	2.10
6/11/20	JTB	Review correspondence from D. Flunker regarding request for correspondence from Board to WSC members; discussion with J. Gimenez regarding responses thereto; confer with J. de la Fuente regarding same; review documents responsive to latest D. Flunker request; internal correspondence with J. de la Fuente and client regarding potential applicability of litigation exception thereto; review and edit draft agenda provided by client and additional correspondence regarding approval of loan from CoBank; draft resolution for approval of loan terms provided by CoBank; review email from CoBank representative containing terms for purposes of same.	2.10
6/12/20	JEF	Work on meeting agenda.	.40
6/12/20	JTB	Correspondence with client and J. de la Fuente regarding Flunker PIA requests and appropriate response thereto; draft same; phone call with client regarding same; prepare zoom meetings for Board meeting and Executive Session Tuesday; assist in preparing agenda for Tuesday meeting; review draft NewGen engagement agreement; finalize resolution to authorize loan from CoBank.	3.70
6/12/20	AAC	Case management.	.20

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

July 30, 2020  
Invoice: 97513244

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/13/20	JTB	Finalize agenda; correspondence with client and J. de la Fuente regarding same; review Open Meetings Act provisions to determine form and sufficiency of notice for Board of Directors participating in mediation.	1.50
6/15/20	JEF	Review and comment on board resolution on loans.	.30
6/15/20	JTB	Finalize resolution for CoBank loans and send to J. de la Fuente for review; finalize NewGen contract review in preparation for upcoming Board meeting; phone calls with client regarding same; internal correspondence regarding same.	1.60
6/16/20	JTB	Review J. de la Fuente edits to CoBank Loan Agreement resolution and finalize same; preparations for client Board meeting and Executive session; participate in same; review and edit documents in preparation for Board Meeting; email correspondence regarding same.	4.50
6/17/20	JTB	Review NewGen master agreement; email correspondence with client and NewGen representative regarding same and proposed revisions thereto; review draft member correspondence regarding Consumer Confidence Report; email correspondence regarding same,	1.80
6/19/20	JTB	Finalize review of draft member correspondence; email correspondence with client regarding same; email correspondence regarding finding of additional document responsive to previous D. Flunker PIA request; discussion with client regarding same and releasing additional document to requestor; review new PIA request from M. Christenson for specific WSC financial information; email correspondence with J. Gimenez regarding same.	1.10
6/19/20	AAC	Case management.	.30
6/22/20	AAC	Calendar 10 day response deadline for 6/19 public information request from M. Christenson.	.20
6/24/20	AAC	Case management.	.20
6/25/20	JTB	Review Agreed Final Judgment and Notice to Requestor prepared by assistant AG; review soil sample report prepared by ELS; correspondence with J. Gimenez regarding Grissom settlement and CoBank loan path forward.	1.20
6/25/20	AAC	Case management.	.20
6/26/20	AAC	Case management.	.30
6/29/20	JTB	Review P. Flunker PIA request; correspondence with client and J. de la Fuente regarding same.	.80
6/30/20	JTB	Continue review of P. Flunker PIA request and J. Gimenez proposed responses to same; phone call with client regarding same and other WSC business.	.80

**TOTAL PROFESSIONAL SERVICES**

**\$ 7,716.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	.70	300.00	210.00
J Troupe Brewer	Principal	26.80	270.00	7,236.00

**Lloyd Gosselink Rochelle & Townsend, P.C.**

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Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-MAG

July 30, 2020  
Invoice: 97513244

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Audrey A Cooper	Paralegal	2.00	135.00	270.00
<b>TOTALS</b>		<b>29.50</b>		<b>\$ 7,716.00</b>

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**DISBURSEMENTS**

**TOTAL DISBURSEMENTS** **\$ .00**

**TOTAL THIS INVOICE** **\$ 7,716.00**

August 24, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97513690  
Client: 3870  
Matter: 0  
Billing Attorney: JTB

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### INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2020:

**RE: General Counsel**

Professional Services	\$ 10,229.00
Total Disbursements	<u>          \$.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 10,229.00</b>

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-JTB

August 24, 2020  
Invoice: 97513690

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
7/01/20	JTB	Review J. Gimenez revisions to Grissom settlement; phone call to discuss same; review draft response to P. Flunker PIA request; email correspondence with client and J. de la Fuente regarding same.	1.20
7/02/20	JTB	Review draft Board email regarding mediation update; draft revisions thereto.	.50
7/03/20	JTB	Finalize and send Board email to provide recap of mediation and update on path forward; email correspondence with J. de la Fuente regarding same; review email correspondence from D. Flunker to board member.	.50
7/06/20	JTB	Review latest PIA request from M. Christensen; review Water Code and Non-Profit Act provisions regarding member access to financial records; email correspondence with client regarding same.	1.10
7/06/20	AAC	Calendar 10 business day deadline for June 29th public information act request; case management; calendar 10 business day deadline for July 3rd public information act request.	.30
7/07/20	JTB	Review documents from Spicewood Airport Pilots Association regarding fencing along easement and alleged encroachment of WSC easement by neighboring property owner; phone call with client regarding same; email correspondence with client and client CPA regarding pending PIA requests and responsive documents.	1.70
7/10/20	JTB	Phone call with SAPA legal counsel; review map and other documents provided by SAPA legal counsel regarding potential encroachment upon WSC easement; email correspondence with J. de la Fuente regarding same and path forward for client; phone call with client regarding same.	1.60
7/13/20	JTB	Review client correspondence regarding threats and member communication from D. Flunker regarding invalidity of Piper lane transaction; internal correspondence regarding same and potential response; review correspondence from WSC CPA and documents provided by same; review correspondence from SAPA legal counsel to WSC Board President regarding potential issue with encroachment upon WOWSC easement and other documentation related to same.	2.00
7/14/20	JEF	Review emails from AG regarding intervention in PIA matter; review plea in intervention and motion for discovery, and work on strategy for response to same; update PUC litigation counsel on litigation issues; finalize production of WSC documents.	1.30
7/14/20	JTB	Review D. Flunker Motion to Intervene to contest settlement agreement between WOWSC and the Attorney General; internal correspondence and correspondence with client regarding same; review P. Flunker reply to J. Gimenez response to P. Flunker PIA request; review Open Records Decision cited by P. Flunker regarding same; correspondence with client and J. de la Fuente regarding path forward.	1.50
7/14/20	AAC	Case management.	.20
7/15/20	JEF	Work with staff on deadlines and response strategy for motion; emails with opposing counsel regarding same; review update from AG on second PIA opinion request.	.70

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-JTB

August 24, 2020  
Invoice: 97513690

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
7/15/20	JTB	Review AG ruling on D. Flunker open records decision request; review AG authorized redactions of responsive information; internal correspondence regarding same; email to client regarding same and relaying counsel on path forward; review draft correspondence to membership in response to D. Flunker email alleging impropriety regarding the conveyance of the Piper Lane tract.	1.50
7/15/20	LRK	Review motions needed for upcoming intervention hearing for PIA case; identify case law focus and plan litigation strategy.	1.00
7/15/20	AAC	Calendar 10 business day response deadline for P. Flunker public information act request; case management; review letter ruling from the Attorney General Open Records Division; review and compare AG decision to 2019 decision regarding attorney invoices and email J. Brewer regarding same; calendar deadline for appeal.	1.10
7/16/20	AAC	Discussion with J. Brewer regarding next steps on AG ruling on PIA request for legal bills; review redactions recommended by AG's Office and redact legal bills accordingly; case management.	1.20
7/20/20	LRK	Review relevant case law for upcoming reply motion for PIA case.	1.70
7/21/20	JEF	Review documents and plan for PIA response; emails with opposing counsel regarding scheduling hearing in PIA litigation.	.50
7/21/20	JTB	Finalize redactions on responsive documents to be released to requestor; internal email correspondence and correspondence with client regarding same; review documents and information regarding P. Flunker PIA request; email correspondence with client regarding same.	.90
7/21/20	LRK	Review plea in intervention and assign research to clerk.	.90
7/21/20	AAC	Case management.	.40
7/27/20	JTB	Email correspondence with J. Gimenez regarding P. Flunker PIA request for summarized information; email correspondence regarding CoBank loan documents and review same in preparation for conference call with finance subcommittee.	.80
7/28/20	JTB	Review documents from client in preparation for conference call with finance subcommittee to discuss CoBank loans; conference call to discuss same and other client business.	1.10
7/29/20	JTB	Review and edit response to P. Flunker for PIA request regarding amounts billed for various legal matters; correspondence with J. Gimenez and Board members regarding same.	.40
7/29/20	LRK	Review case law research from clerk for use in upcoming response motion.	.70
7/30/20	LRK	Draft reply motion to request for intervention to prevent requested discovery by intervenor.	5.10
7/31/20	JEF	Email with L. Killeen regarding upcoming hearing on PIA discovery and approach for same.	.20
7/31/20	LRK	Draft reply motion to request for intervention to prevent requested discovery by intervenor.	7.50
7/31/20	LCL	Monthly law clerk time.	8.50

**TOTAL PROFESSIONAL SERVICES**

**\$ 10,229.00**

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
General Counsel  
I.D.3870-0-JTB

August 24, 2020  
Invoice: 97513690

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	2.70	300.00	810.00
J Troupe Brewer	Principal	14.80	270.00	3,996.00
Lindsay R Killeen	Associate	16.90	240.00	4,056.00
Audrey A Cooper	Paralegal	3.20	135.00	432.00
Law Clerk	Law Clerk	8.50	110.00	935.00
<b>TOTALS</b>		<b>46.10</b>		<b>\$ 10,229.00</b>

**TOTAL THIS INVOICE**

**\$ 10,229.00**

October 16, 2019

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97504405  
Client: 3870  
Matter: 1  
Billing Attorney: JEF

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### INVOICE SUMMARY

For professional services and disbursements rendered through September 30, 2019:

**RE: TOMA Integrity Litigation**

Professional Services	\$ 9,984.00
Total Disbursements	<u>\$ 600.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 10,584.00</b>

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

October 16, 2019  
Invoice: 97504405

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
9/03/19	JEF	Review emails among all parties regarding case path; confer with counsel for Friendship homes regarding mediation; confer with client contact regarding case issues, overall path forward, and mediation specifics; review first requests for production to Dana Martin; email to insurance adjuster regarding coverage.	1.10
9/04/19	JEF	Call with all litigation counsel to discuss scheduling, case issues, and next steps; work with client to schedule mediation; confirm and set same, communicate with mediator; review live petition for case issues to prepare for mediation	.80
9/06/19	JEF	Begin work on mediation statement.	1.60
9/06/19	JTB	Review correspondence regarding upcoming mediation and attached documents from J. de la Fuente; correspondence with J. de la Fuente to assist in preparation for mediation; research regarding WSC authority to sell or convey property.	2.10
9/09/19	JEF	Prepare for mediation, including finalizing letter and exhibits to send to mediator, send same; preparatory call with client representatives; review possible issues with plaintiffs' claims.	1.70
9/09/19	JTB	Continue research into power and abilities of WSCs; correspondence with J. de la Fuente regarding same and relaying research findings.	1.70
9/10/19	JFP	Assess legal theories and possible avenues to ratify contract.	.20
9/10/19	JEF	Prepare for and conduct mediation, finalize settlement terms; review emails in underlying litigation.	6.40
9/11/19	JEF	Work on additional approaches and issues for possible settlement; follow up on plan for PIA appeal; review emails in underlying litigation.	.90
9/12/19	JEF	Emails with opposing counsel regarding settlement issues.	.20
9/13/19	JEF	Work on follow up to settlement agreement; review possible PIA appeal related to litigation, and edit same.	1.10
9/16/19	JEF	Review executed agreement and send same; review final draft of PIA appeal petition for filing.	.40
9/17/19	JEF	Review additional settlement update and possible timing issues.	.30
9/18/19	JEF	Prepare for and attend board meeting to address possible settlement and path forward; travel to and from same.	2.20
9/18/19	JEF	No Charge - Travel to and from Board meeting.	1.00
9/20/19	JFP	Revise and edit motion to quash depositions.	.20
9/20/19	JEF	Review deposition notices; prepare and file motion for protection from same; review email and issues regarding privileged document.	2.10
9/22/19	JEF	Review emails and respond to same with opposing counsel.	.40
9/23/19	JEF	Review email from S. O'Brien regarding depositions; review additional email from opposing counsel regarding discovery; review written discovery from plaintiffs; begin working on response plan, and plan for briefing plea to jurisdiction.	1.10
9/24/19	JEF	Email with client contact regarding certain documents; work on approaches for plea to jurisdiction and possible motion for summary judgment; review emails from	1.10

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

October 16, 2019  
Invoice: 97504405

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
		opposing counsel to court regarding possible discovery hearings; work with staff on hearing dates for plea to jurisdiction.	
9/24/19	JTB	Discussion with L. Killeen regarding prior research for WSC powers/abilities to sell or convey property; correspondence with J. de la Fuente and L. Killeen regarding same and path forward in responsive pleading; review discovery requests.	1.90
9/24/19	LRK	Get up to date on posture of the case; Read and review First Interrogatories and Request for Production; research ultra vires claim; determine if we will need an evidentiary plea to the jurisdiction or not; update J. de la Fuente	4.10
9/25/19	JEF	Emails with opposing counsel regarding various litigation matters; review order from court, and confer with team regarding same; confer with counsel for co-defendants regarding same.	.70
9/25/19	KWM	Review Intervenors' First Set of Interrogatories and Request for Production to Windermere Oaks; review Defendant Windermere's Motion for Protection and Motion to Quash Intervenors' Deposition Notice; review Defendant Mebane's Motion for Protection and Motion to Quash Plaintiffs/Intervenors Deposition Notice; calendar response deadlines for same.	.20
9/26/19	JEF	Review emails among counsel regarding scheduling and privilege issues; confer with client representatives regarding path forward; confer with co-defense counsel regarding same.	1.00
9/27/19	JEF	Call with co-defense counsel regarding planned agreed order; follow up on certain case facts regarding memberships; review email from D. Flunker; prepare for and conduct call with all counsel to reach agreement and submit same to court; review draft agreed report and edit same, send to all counsel.	1.30
9/28/19	JEF	Review final version of status report to court, email with all counsel to approve same.	.30
9/30/19	JEF	Review filing of final report to court; review additional discovery requests; review draft client correspondence in response to D. Flunker issues.	.40
9/30/19	KWM	Review Intervenors Second Request for Production of Documents to Windermere and calendar deadline for response.	.10

**TOTAL PROFESSIONAL SERVICES**

**\$ 9,984.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>	<b>N/C Hr</b>	<b>N/C \$</b>
Jose E de la Fuente	Principal	300.00	25.10	7,530.00	1.00	300.00
J Troupe Brewer	Associate	270.00	5.70	1,539.00	.00	.00
James F Parker	Principal	290.00	.40	116.00	.00	.00
Lindsay R Killeen	Associate	185.00	4.10	758.50	.00	.00
Karen W Mallios	Litigation	135.00	.30	40.50	.00	.00
<b>TOTALS</b>			<b>35.60</b>	<b>\$ 9,984.00</b>	<b>1.00</b>	<b>\$ 300.00</b>

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

October 16, 2019  
Invoice: 97504405

**DISBURSEMENTS**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
9/06/19	Clark Legal Services Check # - 000037271 Miscellaneous Expense, Clark Legal Services, PLLC, Mediator's fee for Windermere Oaks on 09/10/19, 09/06/2019	600.00

**TOTAL DISBURSEMENTS** **\$ 600.00**

**TOTAL THIS INVOICE** **\$ 10,584.00**

April 16, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97509397  
Client: 3870  
Matter: 1  
Billing Attorney: JEF

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### INVOICE SUMMARY

For professional services and disbursements rendered through March 31, 2020:

**RE: TOMA Integrity Litigation**

Professional Services	\$ 4,200.00
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 4,200.00</b>
Retainer Held on Account	\$ 2,500.00

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

April 16, 2020  
Invoice: 97509397

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
3/02/20	JEF	Review emails among counsel regarding discovery approach.	.20
3/02/20	JTB	Review of order issued on preliminary motions to work on Chapter 22 guidance document and suggested special exceptions.	2.50
3/03/20	JEF	Review emails among counsel regarding discovery; update client regarding same.	.40
3/03/20	JTB	Review correspondence from opposing counsel and J. de la Fuente regarding discovery requests and path forward following motion rulings; review Chapter 22 ratification outline as potential strategy to settle suit following filing of special exceptions; review correspondence from AG staff attorney regarding appeal of Open Records Ruling.	3.50
3/03/20	LRK	Review case status and order received; client team discussion on actions needed.	.40
3/04/20	JEF	Review other parties' draft special exceptions, finalize same for WOWSC and send to opposing counsel.	.70
3/05/20	JEF	Send draft special exceptions to opposing counsel; email responses and replies regarding same, including emails with co-defendants and client.	.80
3/05/20	JTB	Review correspondence from opposing counsel, client, and J. de la Fuente regarding discovery requests and additional filings following court ruling on pending motions.	.80
3/23/20	LRK	Read and review new filings by defendant directors.	.10
3/24/20	JEF	Review pleadings from director; review email from opposing counsel; email to client regarding strategies related to same.	.60
3/25/20	JEF	Review emails from opposing counsel and co-defendants regarding discovery; work on plan for dealing with same.	.30
3/26/20	JEF	Work on discovery issues, including emails among counsel regarding same; work on special exceptions and approach for same.	.40
3/26/20	JEF	Review emails regarding discovery; begin work on draft special exceptions.	.40
3/29/20	JEF	Work on draft special exceptions, finalize draft of same and send to staff to finalize; emails with counsel for directors regarding same and discovery.	1.10
3/30/20	JEF	Finalize and file special exceptions; prepare and send email to Plaintiffs' counsel regarding same.	.50
3/30/20	JTB	Review Special Exceptions filed on behalf of client in response to Plaintiffs' Second Amended Petition and J. de la Fuente correspondence regarding same.	.40
3/30/20	JTB	No Charge - Review Special Exceptions filed on behalf of client in response to Plaintiffs' Second Amended Petition and J. de la Fuente correspondence regarding same.	.40
3/30/20	LRK	Read and review special exceptions as filed.	.10
3/31/20	JEF	Review emails on discovery items.	.20
3/31/20	LRK	Review communication from opposing counsel regarding privilege log; review what was withheld and applicability of rule and relevant case law; formulate response to request.	1.80

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

April 16, 2020  
Invoice: 97509397

**TOTAL PROFESSIONAL SERVICES \$ 4,200.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>	<b>N/C Hr</b>	<b>N/C \$</b>
Jose E de la Fuente	Principal	300.00	5.60	1,680.00	.00	.00
J Troupe Brewer	Principal	270.00	7.20	1,944.00	.40	108.00
Lindsay R Killeen	Associate	240.00	2.40	576.00	.00	.00
<b>TOTALS</b>			<b>15.20</b>	<b>\$ 4,200.00</b>	<b>.40</b>	<b>\$ 108.00</b>

**TOTAL THIS INVOICE \$ 4,200.00**

May 26, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97510250  
Client: 3870  
Matter: 1  
Billing Attorney: JEF

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### INVOICE SUMMARY

For professional services and disbursements rendered through April 30, 2020:

**RE: TOMA Integrity Litigation**

Professional Services	\$ 1,815.00
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 1,815.00</b>
Retainer Held on Account	\$ 2,500.00

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

May 26, 2020  
Invoice: 97510250

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
4/01/20	JEF	Review document to be produced and comment on same.	.20
4/06/20	JEF	Review documents for privilege, email with S. O'Brien regarding same.	.20
4/13/20	JEF	Review plaintiffs' supplemental petition.	.30
4/13/20	JTB	Review Plaintiffs' Supplemental Petition.	1.20
4/14/20	JEF	Confer with client regarding supplemental petition and path forward; confer with co-defendant regarding same.	.40
4/27/20	JTB	Work on outline for District court brief and review prior AG submissions in preparation for work session with J. de la Fuente regarding filing deadline and brief draft.	1.20
4/28/20	JTB	WOWSC work session with J. de la Fuente on client action items and filing deadlines; begin work on district court briefing outline.	2.10
4/30/20	JEF	Confer with client regarding case status and possible paths forward; review PUC rate appeal notice and comment on same.	.90

**TOTAL PROFESSIONAL SERVICES \$ 1,815.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	2.00	300.00	600.00
J Troupe Brewer	Principal	4.50	270.00	1,215.00
<b>TOTALS</b>		<b>6.50</b>		<b>\$ 1,815.00</b>

**TOTAL THIS INVOICE \$ 1,815.00**

June 22, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97511429  
Client: 3870  
Matter: 1  
Billing Attorney: JEF

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### INVOICE SUMMARY

For professional services and disbursements rendered through May 31, 2020:

**RE: TOMA Integrity Litigation**

Professional Services	\$ 3,981.00
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 3,981.00</b>

Retainer Held on Account \$ 2,500.00

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

June 22, 2020  
Invoice: 97511429

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
5/01/20	JEF	Confer with assistant AG regarding possible settlement path.	.20
5/04/20	JEF	Work with J. Gimenez on settlement approaches, and billing issues related to dispute.	.40
5/05/20	JEF	Review additional RFP to WSC; review amended depo notice of WSC and prepare response to same.	.40
5/05/20	JTB	Review forwarded correspondence from Plaintiffs regarding latest allegations; review latest discovery request.	.80
5/05/20	LRK	Review seventh requests for production and related client communications.	.20
5/06/20	JEF	Review email from opposing counsel; review incoming discovery requests and email same to client with comments; review emails from other parties with additional documentation; emails with client regarding possible mediation; work on draft PIA response.	.90
5/07/20	JEF	Work on review of discovery issues and possible resolution of same.	.20
5/08/20	JEF	Work with insurance coverage counsel on case issues; review notice of nonsuit of Mr. Morse; work on approaches to privileges and confer with counsel for director defendants regarding same; review notice of deposition and prepare for motion to quash; call with opposing counsel regarding scheduling and Rule 11 agreement regarding same.	1.50
5/08/20	JTB	Review files to obtain copies of all applicable insurance coverage documents; email correspondence with J. de la Fuente and A. Cooper regarding same; review same for provisions related to coverage for official/director coverage for official acts following request from insurance counsel.	1.40
5/08/20	LRK	Send previously withheld documents for review based on new discovery requests.	.30
5/11/20	JEF	Confer with counsel for directors about path forward and strategy; prepare for and conduct executive session with client team at meeting regarding litigation issues and possible paths.	1.10
5/12/20	JEF	Confer with insurance coverage counsel regarding coverage issues and path.	.70
5/13/20	JEF	Email with client regarding possible paths forward; work on PIA response issues; work with insurance coverage attorney.	.40
5/17/20	JEF	Review draft letter to insurer regarding coverage and comment on same.	.40
5/18/20	JEF	Review and comment on draft letter to insurer; emails with opposing counsel regarding conference.	.30
5/18/20	JTB	Review letter sent by insurance counsel to Allied World to rebut denial of coverage in preparation for Executive Session discussion regarding same; email correspondence for purposes of same.	1.10
5/19/20	JEF	Confer with opposing counsel regarding mediation issues; prepare for and conduct executive session with client regarding litigation matters.	1.10
5/20/20	JEF	Review PIA request issues seeking litigation bills and comment on same.	.30
5/22/20	JEF	Confer with opposing counsel regarding discovery and mediation approaches; confer with counsel for directors regarding same.	.90

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

June 22, 2020  
Invoice: 97511429

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
5/26/20	JEF	Review emails regarding deposition scheduling, respond to same; confer with counsel for Friendship regarding possible mediation path and litigation path forward.	.60
5/27/20	JEF	No Charge - Review filings from Friendship Homes; review information regarding mediator availability.	.30
5/29/20	JEF	Confer with counsel for Friendship homes regarding path forward; confer with counsel for directors regarding same, and mediation plan; email opposing counsel regarding same.	.50

**TOTAL PROFESSIONAL SERVICES \$ 3,981.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>	<b>N/C Hr</b>	<b>N/C \$</b>
Jose E de la Fuente	Principal	300.00	9.90	2,970.00	.30	90.00
J Troupe Brewer	Principal	270.00	3.30	891.00	.00	.00
Lindsay R Killeen	Associate	240.00	.50	120.00	.00	.00
<b>TOTALS</b>			<b>13.70</b>	<b>\$ 3,981.00</b>	<b>.30</b>	<b>\$ 90.00</b>

**TOTAL THIS INVOICE \$ 3,981.00**

July 23, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97512452  
Client: 3870  
Matter: 1  
Billing Attorney: JEF

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### INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2020:

**RE: TOMA Integrity Litigation**

Professional Services	\$ 18,789.50
Total Disbursements	<u>          \$.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 18,789.50</b>

Retainer Held on Account	\$ 2,500.00
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Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

July 23, 2020  
Invoice: 97512452

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/01/20	JEF	Work on discovery response follow up, deposition scheduling; work on mediation scheduling; review materials for response to PIA request on removal petition issues.	.70
6/01/20	LRK	Review discovery needed to answer 6th requests for production; email client.	1.00
6/02/20	JEF	Comment on Flunker PIA response strategy; begin preparation for mediation.	.50
6/02/20	LRK	Review documents responsive to 6th RFPs.	.20
6/03/20	JEF	Work on review of responsive invoice for Flunker PIA request, and approaches to respond to same; emails regarding mediation.	.50
6/03/20	JTB	Phone calls and email correspondence with client regarding proposed mediation.	.50
6/03/20	LRK	Draft responses to 6th requests for production; prepare documents to be produced.	1.00
6/03/20	KWM	Assist with assignment from L. Killeen to bates number additional documents responsive to Sixth Set of Production of documents; email L. Killeen and J. de la Fuente regarding same.	.40
6/04/20	JEF	Work on mediation issues; work on discovery responses; work on follow up approach on Flunker PIA; review draft docket control order; emails with opposing counsel regarding discovery responses.	1.50
6/04/20	JTB	Begin work on supplemental discovery responses; review J. de la Fuente outline of discoverable issues and topics; review of internal files to respond to discovery requests; internal correspondence with J. de la Fuente and A. Cooper regarding same.	2.10
6/04/20	LRK	Finalize and review responses to 6th requests for production.	.60
6/04/20	AAC	Review correspondence from party requesting discoverable documents; search client files for discoverable documents related to rate increase and real estate appraisal; correspondence with J. Brewer regarding strategy.	.70
6/05/20	JEF	Emails regarding discovery and scheduling of same; work on approach to responding to Flunker PIA, including call to client; follow up on potentially responsive documents for supplementing discovery.	1.70
6/05/20	JTB	Continue work in reviewing and compiling documents for supplemental discovery response; review internal files and files provided by client for purposes of same; email correspondence and phone calls with client, S. O'Brien, A. Cooper, and J. de la Fuente regarding same.	2.70
6/05/20	AAC	Review FileDisk index and correspondence with I. Quiroz and R. Yeisley regarding possible paper files; discussion with J. Brewer regarding strategy for managing discovery and compiling discoverable documents.	.50
6/08/20	JEF	Work on discovery responses, including gathering additional documents; confer with T. Brewer regarding same; emails with co-defendant counsel regarding depositions and possible expert needed; emails with opposing counsel regarding depositions.	1.20
6/08/20	JTB	Continue document review and preparation for supplemental discovery response; conference call with J. de la Fuente and A. Cooper regarding same.	1.40

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

July 23, 2020  
Invoice: 97512452

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/08/20	AAC	Create index of discoverable documents based on discussions with J. Brewer and J. de la Fuente; participate in team conference call with J. Brewer and J. de la Fuente regarding discovery matters; compile potential discoverable documents and forward to J. Brewer.	3.50
6/09/20	JEF	Follow up call with T. Brewer and client contact on documents for discovery responses; review new incoming documents; review additional Flunker PIA and work on strategy to respond to same; emails with counsel for directors regarding additional case information; work on mediation form.	1.70
6/09/20	JTB	Continue work supplemental discovery response; conference call with J. de la Fuente and D. Taylor regarding same; email correspondence with A. Cooper regarding same; review of additional documents provided by client to determine responsiveness; review correspondence and documents from S. O'Brien.	2.10
6/09/20	AAC	Continue work on index of discoverable documents; cross check index with documents produced during previous rounds of discovery; email J. Brewer regarding same.	1.50
6/10/20	JEF	Review additional documents for discovery; review responsive information for new Flunker PIA request; review additional responsive facts for discovery; follow up emails with all parties on discovery and mediation; review additional emails regarding Flunker PIA.	1.40
6/10/20	JTB	Review additional documents forward from client for response to discovery requests; email correspondence with clients regarding same; phone call with D. Taylor regarding same; email correspondence with D. Norton regarding possible possession of responsive client documents.	1.80
6/10/20	AAC	Review additional documents from D. Taylor and update index of discoverable documents; email J. Brewer regarding same.	.50
6/11/20	JEF	Review documents potentially responsive to Flunker PIA, and prepare response to same; revise mediation form.	.70
6/12/20	JEF	Follow up on communications with requestor regarding Flunker PIA request; emails regarding deposition dates and requests; emails regarding protective order; review information regarding mitigation of site.	.80
6/14/20	JTB	Review documents forwarded from client as potentially responsive to pending discovery requests.	1.20
6/15/20	JEF	Review emails with additional case documents; prepare plan for discovery responses and possible mediation path; review correspondence regarding insurance claim; finalize production; review emails regarding deposition approach; emails regarding insurance claim.	1.60
6/15/20	JTB	Coordination call with J. de la Fuente and A. Cooper to discuss latest round of documents for production; phone call with D. Taylor to discuss additional potentially responsive documents to pending discovery requests; email correspondence and phone call with J. Gimenez regarding client files at water treatment plant and whether same could include potentially responsive documents.	1.80
6/15/20	KWM	Respond to email assignment to assist with Bates Numbering WOWSC's Seventh	.60

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

July 23, 2020  
Invoice: 97512452

Date	Atty	Description Of Services Rendered	Hours
		set of Production of Documents; email J. de la Fuente, T. Brewer and A. Cooper regarding same.	
6/15/20	AAC	Review additional discoverable documents provided from client files and update index of discovery documents; review documents previously produced and email J. Brewer regarding same; phone call with J. Brewer and J. de la Fuente regarding same.	1.80
6/16/20	JEF	Follow up on discovery with counsel for directors; prepare for and conduct executive session briefing on all litigation matters, including upcoming mediation; email from mediator.	1.80
6/16/20	JTB	Internal email correspondence and emails with clients regarding issues raised in review of latest documents received from client; review documents forwarded by client for purposes of same.	1.20
6/17/20	JEF	Review comments from board meeting; emails with mediator regarding mediation and settlement issues and questions; review emails among counsel regarding discovery issues; review incoming deposition notices and begin work on response to same.	1.30
6/17/20	LRK	Review updated filings in matter.	.30
6/18/20	JEF	Emails with counsel for directors regarding mediation; work on strategy for motion to quash deposition, email with client to discuss same.	.50
6/18/20	LRK	Begin drafting motion to quash Plaintiff's amended notice to corporate representative deposition.	3.10
6/19/20	JEF	Review additional issues for potential production; email and calls with mediator for next steps; emails with counsel for directors regarding videos; review correspondence regarding litigation; review additional documents for production; work on approach for motion for protection; review PIA litigation proposed judgment and approve same; work on motion to quash deposition.	1.30
6/19/20	JTB	Phone call with D. Taylor regarding discovery documents and related; review of additional appraisal, property, and budgetary/financial documents provided by client; review of outline of Chapter 22 ratification memo; draft updates to same; review Chapter 22 of Business Organizations Code for purposes of same and particularly to outline and address proper procedure for ratification of corporate acts at issue in current pleading; review Plaintiffs' correspondence to County Sheriff containing numerous criminal allegations against current and former Board members; internal correspondence regarding same.	3.50
6/19/20	LRK	Draft declaration for use in motion to quash; get signed by client.	.70
6/22/20	JEF	Finalize and file motion to quash; emails with opposing counsel and co-defendants regarding same, and letter to all residents; emails with clients regarding same; call with client contact regarding mediation attendance; work on mediation statement; work on approach for additional production.	2.80
6/22/20	JTB	Phone calls with clients and J. de la Fuente regarding upcoming mediation; review and organize additional discovery documents provided by client; phone calls with client regarding same.	1.60

**Lloyd Gosselink Rochelle & Townsend, P.C.**

Windermere Oaks Water Supply Corporation  
TOMA Integrity Litigation  
I.D.3870-1-JEF

July 23, 2020  
Invoice: 97512452

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/22/20	LRK	Finalize and file motion to quash corporate representative deposition.	.60
6/22/20	AAC	Review additional discoverable documents from D. Taylor and P. Mulligan and create new index of additional supplemental discovery documents; email J. Brewer regarding same.	2.00
6/23/20	JEF	Finalize and send mediation statement to mediator; confer with co-defendants' counsel regarding discovery, and pick up additional documents for production.	1.60
6/23/20	JTB	Phone calls with D. Taylor regarding discovery documents and other matters relevant to litigation; review statement to mediator; review discovery index file and zip drive prepared by A. Cooper.	1.40
6/23/20	AAC	Update index of additional discoverable documents provided by D. Taylor and other directors; compare documents with files that have already been produced and email J. Brewer and J. de la Fuente regarding same; prepare documents for production.	1.00
6/24/20	JEF	Work with mediator on prep for mediation, including preparation for Zoom, and discussion of possible paths; work with client representatives regarding same; review email from AG regarding PIA suit; emails regarding protective order.	2.10
6/25/20	JEF	Review email regarding soil sample results; prepare for and conduct mediation, including follow up communications regarding same.	5.60
6/26/20	JEF	Follow up on materials to continue mediation.	.30
6/26/20	JTB	Review and gather relevant portions of WOWSC insurance policies for director coverage following mediation developments; internal email correspondence regarding same; continue review and update of Chapter 22 ratification memo and considerations.	1.80
6/29/20	JEF	Review insurance documents and send same to opposing counsel for mediation; email with counsel for directors regarding same.	.40
6/30/20	JEF	Review order from court requesting status conference.	.20

**TOTAL PROFESSIONAL SERVICES \$ 18,789.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	30.20	300.00	9,060.00
J Troupe Brewer	Principal	23.10	270.00	6,237.00
Lindsay R Killeen	Associate	7.50	240.00	1,800.00
Karen W Mallios	Litigation Support Specia	1.00	140.00	140.00
Audrey A Cooper	Paralegal	11.50	135.00	1,552.50
<b>TOTALS</b>		<b>73.30</b>		<b>\$ 18,789.50</b>

**TOTAL THIS INVOICE \$ 18,789.50**

June 26, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97511347  
Client: 3870  
Matter: 4  
Billing Attorney: JLM

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### INVOICE SUMMARY

For professional services and disbursements rendered through May 31, 2020:

**RE: PUC Rate Appeal**

Professional Services	\$ 7,674.00
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 7,674.00</b>

Windermere Oaks Water Supply Corporation  
PUC Rate Appeal  
I.D.3870-4-JLM

June 26, 2020  
Invoice: 97511347

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
5/21/20	JTB	Internal correspondence regarding new matter and supplemental engagement letter for representation in PUC Rate Appeal; email correspondence and phone call with client regarding same.	.80
5/22/20	JLM	Calls with T. Brewer and D. Klein regarding new matter; review PUC filings and begin researching appropriate response; call and correspondence with C. Thompson regarding same.	2.50
5/22/20	JTB	Work session with J. Mauldin regarding PUC rate appeal; internal correspondence regarding same; email and phone correspondence with client for purposes of same; conference call with J. Mauldin and D. Klein regarding same and path forward for drafting.	2.20
5/22/20	CLT	Conference with J. Mauldin regarding assignment on response to ratepayer appeals; research regarding the same; prepare shell response to Order No. 1 and ratepayer appeal.	2.30
5/23/20	JLM	Continue researching law for Response to Order No. 1.; Begin drafting response to Order No. 1.	2.40
5/24/20	JEF	Prepare and send summary of litigation for preparation of PUC defense.	.30
5/25/20	JLM	Continue researching for Response to Order No. 1; continue drafting same.	3.60
5/26/20	JLM	Continue drafting Response to Order No. 1; correspondence with T. Brewer and J. dela Fuente regarding same.	6.70
5/26/20	JTB	Review draft response filing in PUC appeal; edits comments thereto; discussion with J. Mauldin regarding same; phone call with client regarding same.	1.50
5/26/20	CLT	Conference with J. Mauldin regarding exhibits to repose to Order No. 1; review and finalize draft of the same.	1.30
5/27/20	JLM	Finalize Response to Order No. 1; correspondence regarding same.	3.40
5/27/20	JTB	Review final draft of response to PUC rate appeal petition; edits to same; email correspondence with J. Mauldin regarding same; email with clients regarding same.	1.20
5/27/20	CLT	Correspond with J. Mauldin regarding response to Order No. 1; update response to Order No. 1; prepare the same for filing.	2.60

**TOTAL PROFESSIONAL SERVICES**

**\$ 7,674.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jose E de la Fuente	Principal	.30	300.00	90.00
J Troupe Brewer	Principal	5.70	270.00	1,539.00
Jamie L Mauldin	Principal	18.60	280.00	5,208.00
Christina L Thompson	Paralegal	6.20	135.00	837.00
<b>TOTALS</b>		<b>30.80</b>		<b>\$ 7,674.00</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**

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Windermere Oaks Water Supply Corporation  
PUC Rate Appeal  
I.D.3870-4-JLM

June 26, 2020  
Invoice: 97511347

**TOTAL THIS INVOICE**

**\$ 7,674.00**

August 26, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97513856  
Client: 3870  
Matter: 4  
Billing Attorney: JLM

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### INVOICE SUMMARY

For professional services and disbursements rendered through July 31, 2020:

**RE: PUC Rate Appeal**

Professional Services	\$ 5,110.50
Total Disbursements	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 5,110.50</b>

**Lloyd Gosselink Rochelle & Townsend, P.C.**Windermere Oaks Water Supply Corporation  
PUC Rate Appeal  
I.D.3870-4-JLMAugust 26, 2020  
Invoice: 97513856**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
7/01/20	JLM	Finalize List of Issues; call with J. Giminez regarding same and develop case strategy; follow-up correspondence regarding same with J. de la Fuente; review Staff's List of Issues.	2.20
7/01/20	JTB	Review list of issues for SOAH consideration; internal email correspondence regarding same.	.60
7/01/20	CLT	Receive and analyze the Commission Staff's List of Issues; prepare, file and serve the List of Issues; confer with J. Mauldin regarding the same; phone conference with SOAH regarding courtesy copy procedure; review and analyze the file stamped copy of Windermere's List of Issues.	1.20
7/02/20	JLM	Review Ratepayers' list of issues; Draft correspondence to J. Giminez and M. Nelson regarding PUC Staff and Ratepayers' list of issues.	.40
7/02/20	JTB	Review proposed list of issues from PUC staff and ratepayer appellants; internal correspondence regarding same.	.60
7/02/20	CLT	Review and analyze the Ratepayers List of Issues.	.20
7/07/20	JLM	Review new filing; follow-up correspondence with J. Giminez and J. de la Fuente regarding same.	.40
7/08/20	JLM	Draft Objection to Ratepayer Representative.	1.60
7/08/20	CLT	Review and analyze Notice of Addition Representation; confer with J. Mauldin and receive assignment regarding objection to Notice of Additional Representation; prepare shell objection to Notice of Additional Representation.	.60
7/09/20	JLM	Complete draft of Objection to Additional Representative; follow-up correspondence regarding same; review Draft Preliminary Order; follow-up correspondence regarding same.	2.10
7/09/20	JTB	Review draft order from PUC staff; review objection to representative status of P. Flunker; email correspondence with client regarding same.	.80
7/09/20	CLT	Review objection to ratepayers notice of additional representation; review and analyze draft preliminary order; calendar PUC open meeting regarding this docket's draft preliminary order.	.80
7/10/20	JLM	Review SOAH Order No. 1; draft correspondence to client regarding same.	.60
7/10/20	CLT	Prepare, file, and serve Windermere's Objection to Notice of Representation; review and analyze the file stamped version of the same; review and analyze SOAH Order No. 1 case description and general procedures; calendar deadline to file an agreed procedural schedule.	1.50
7/13/20	CLT	Review file and update project list with status.	.30
7/14/20	JLM	Telephone call with J. de la Fuente and T. Brewer regarding case strategy and background.	.40
7/14/20	JTB	Call with Jamie and J. de la Fuente to discuss litigation status and goals in light of path forward in PUC rate appeal.	.50
7/16/20	JLM	Prepare for call with J. Giminez and M. Nelson regarding procedural schedule; call	1.40



July 8, 2020

Windermere Oaks Water Supply Corporation  
Attn Joe Gimenez  
Board President  
424 Coventry Road  
Spicewood, TX 78669

Invoice: 97512426  
Client: 3870  
Matter: 4  
Billing Attorney: JLM

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### INVOICE SUMMARY

For professional services and disbursements rendered through June 30, 2020:

**RE: PUC Rate Appeal**

Professional Services	\$ 1,275.00
Total Disbursements	<u>          \$.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 1,275.00</b>

Windermere Oaks Water Supply Corporation  
PUC Rate Appeal  
I.D.3870-4-JLM

July 8, 2020  
Invoice: 97512426

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Atty</b>	<b>Description Of Services Rendered</b>	<b>Hours</b>
6/19/20	JLM	Review Staff's recommendation on administrative completeness; follow-up correspondence to J. Giminez and M. Nelson.	.30
6/24/20	JLM	Review Commission orders and draft correspondence to J. Giminez regarding same.	.40
6/24/20	CLT	Review, analyze and save PUC Order No. 3 finding the application administratively complete.	.20
6/26/20	JLM	Begin drafting list of issues.	.50
6/26/20	CLT	Research regarding examples for the List of Issues; confer with J. Mauldin regarding the same; prepare draft List of Issues.	2.00
6/30/20	JLM	Continue drafting List of Issues; follow-up correspondence regarding same.	2.10
6/30/20	CLT	Follow-up with J. Mauldin regarding status of List of Issues filing; review and revise Windermere's List of Issues.	.40

**TOTAL PROFESSIONAL SERVICES \$ 1,275.00**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Staff Level</b>	<b>Hours</b>	<b>Rate</b>	<b>Total</b>
Jamie L Mauldin	Principal	3.30	280.00	924.00
Christina L Thompson	Paralegal	2.60	135.00	351.00
<b>TOTALS</b>		<b>5.90</b>		<b>\$ 1,275.00</b>

**TOTAL THIS INVOICE \$ 1,275.00**