

MUKWONAGO AREA SCHOOL DISTRICT
 PERSONAL & CONFIDENTIAL
 ATTENTION: DR. JOSEPH KOCH
 385 E. VETERANS WAY
 MUKWONAGO, WI 53149

Statement Date:
 Statement No.
 Account No.

January 8, 2025
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RE: GENERAL SCHOOL LAW

			<u>Fees</u>	
			Hours	
12/02/2024	ERT	Attend ERD prehearing conference; correspondence with client regarding the same; initial analysis of issues related to discovery request.	0.60	168.00
	JMC	Prepare for and participate in prehearing conference; review and analyze discovery requests.	0.80	236.00
	JMC	Correspondence and telephone conference with client regarding prehearing conference and related matters.	0.40	118.00
12/03/2024	ERT	Review and analysis of request for production of documents and interrogatories in ERD matter.	0.60	168.00
	JMC	Internal strategy conference regarding discovery responses.	0.20	59.00
12/04/2024	BCB	Review/analysis of plaintiffs discovery requests in [REDACTED] matter; strategy conference regarding responding to discovery in same; outline potential objections regarding same.	2.20	583.00
	JMC	Review and analysis of issues related to discovery responses.	0.20	59.00
12/05/2024	ERT	Correspondence with client regarding ERD discovery request; research and analysis of issues related to Superintendent evaluation rubric.	0.60	168.00
	BJW	Review and analysis of issues related to employee evaluation and status of employee collective bargaining rights; conference call with client to discuss same.	1.80	558.00
12/09/2024	BCB	Review/analysis of documents provided by School District in response to discovery requests for purposes of determining what needs to be provided in responses.	0.90	238.50
	JMC	Review and analysis of draft discovery responses.	0.20	59.00
12/10/2024	BCB	Review and analysis of documents provided by School District in response to discovery requests.	2.70	715.50
	BJW	Review and analysis of issues related to Act 10 litigation.	0.50	155.00
12/11/2024	BJW	Review and analyze issues related to employee evaluation, and draft language		

GENERAL SCHOOL LAW

			Hours	
		concerning same.	0.50	155.00
	JMC	Internal strategy and status conference regarding discovery responses.	0.20	59.00
12/13/2024	ERT	Initial review and analysis of records in response to discovery request.	0.50	140.00
12/16/2024	ERT	Analysis of issues related to ERD discovery request; review records provided from the client; correspondence with client regarding the same.	1.00	280.00
	JMC	Review and analysis regarding discovery responses and related strategic issues.	0.40	118.00
12/18/2024	ERT	Additional review of interrogatories in response to ERD discovery request.	0.40	112.00
	BCB	Begin drafting discovery responses.	0.80	212.00
	BJW	Conference call with client to discuss parent issue.	0.10	31.00
12/19/2024	ERT	Conference with client regarding responses to ERD discovery request; draft responses to interrogatories.	1.10	308.00
	BJW	Conference call with client to discuss termination of vendor agreement.	0.10	31.00
12/20/2024	BCB	Draft discovery responses and compile all documents for production.	2.80	742.00
	BJW	Review and analyze issues related to Board election, and conference call with client to discuss same.	0.70	217.00
12/23/2024	JMC	Review and revise discovery responses.	1.10	324.50
12/26/2024	JMC	Continue review and revision of discovery responses.	0.80	236.00
12/27/2024	JMC	Continue review, analysis, and revision of discovery responses.	2.10	619.50
12/30/2024	ERT	Revise draft of discovery response; correspondence with client regarding the same.	0.30	84.00
	BJW	Conference call with client to discuss issues related to Board election.	0.20	62.00
	JMC	Continue to review and revise discovery responses; attempt to contact opposing counsel regarding procedural issues.	3.60	1,062.00
12/31/2024	ERT	Review documents in response to ERD discovery request; correspondence with client regarding draft response to discovery request.	1.00	280.00
	JMC	Revise and finalize discovery responses and ensure transmission to clients for review.	3.40	1,003.00
		For Current Services Rendered	32.80	9,361.00
		Total Current Work		9,361.00
		Balance Due		<u>\$9,361.00</u>

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RE: GENERAL BENEFITS

Fees

			Hours	
12/02/2024	MJF	Research regarding Act 10 trust termination requirements.	1.40	476.00
12/04/2024	MJF	Finalize draft 403(b) Trust and review 403(b) Adoption Agreement regarding same.	1.60	544.00
12/09/2024	MJF	Prepare for and participate in discussion regarding OPEB documents and Board meeting.	1.00	340.00
12/10/2024	JMC	Review benefits trust documents.	0.90	265.50
12/12/2024	MJF	Review final documents and language; prepare correspondence regarding same.	0.30	102.00
		For Current Services Rendered	5.20	1,727.50
		Total Current Work		1,727.50
		Balance Due		<u>\$1,727.50</u>

MUKWONAGO AREA SCHOOL DISTRICT
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ATTENTION: DR. JOSEPH KOCH
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RE: GENERAL BENEFITS

Fees

			Hours	
11/01/2024	MJF	Prepare new draft Trust Agreements.	2.20	748.00
11/07/2024	MJF	Research regarding DPI Fund 73 guidance regarding the termination of an OPEB Trust and disposition of assets.	2.30	782.00
11/08/2024	MJF	Redraft new Trust agreements and background information and resolutions for Board action.	3.20	1,088.00
11/13/2024	MJF	Review current 403(b) language and prepare outline of steps needed to allocate funds.	1.70	578.00
11/22/2024	MJF	Prepare draft final packet of Board items for OPEB changes and new trusts.	2.20	748.00
		For Current Services Rendered	11.60	3,944.00
		Total Current Work		3,944.00
		Balance Due		<u>\$3,944.00</u>

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Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00099 GENERAL SCHOOL LAW					
0.00	9,361.00	0.00	0.00	0.00	\$9,361.00
2631-08287 GENERAL BENEFITS					
0.00	1,727.50	0.00	0.00	0.00	\$1,727.50
<u>0.00</u>	<u>11,088.50</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>\$11,088.50</u>

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	Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00099 GENERAL SCHOOL LAW	0.00	7,054.00	0.00	35.96	0.00	\$7,089.96
2631-08287 GENERAL BENEFITS	0.00	3,944.00	0.00	0.00	0.00	\$3,944.00
	<u>0.00</u>	<u>10,998.00</u>	<u>0.00</u>	<u>35.96</u>	<u>0.00</u>	<u>\$11,033.96</u>

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RE: GENERAL SCHOOL LAW

Fees

			Hours	
11/01/2024	BJW	Conference call with client to discuss issues related to public records request.	0.10	31.00
11/02/2024	BJW	Conference call with client to discuss school board matter.	0.20	62.00
11/05/2024	BJW	Review and analyze materials and issues related to public records requests, and communicate with client regarding same.	1.80	558.00
11/06/2024	BJW	Review and analyze issues related to public records request, and conference call with client to discuss same.	0.80	248.00
11/07/2024	BJW	Conference call with client regarding personnel matter; review and analyze issues related to public records request, and communicate with client regarding same.	1.40	434.00
	JSA	Review public records request for notes, review applicable case law, and conference to discuss obligations under the WI Public Records Law.	0.60	219.00
11/11/2024	BJW	Prepare for and attend closed session school board meeting to discuss potential litigation.	3.80	1,178.00
11/13/2024	BJW	Conference call with client to discuss issues related to public records request.	0.10	31.00
11/14/2024	BJW	Review and analyze Board policies regarding Board member vacancies, and conference call with client regarding same; conference call with client regarding grant program.	0.90	279.00
11/15/2024	BJW	Initial review of materials and issues related to grant program.	0.80	248.00
11/18/2024	ERT	Initial analysis of issues related to vendor contract.	0.50	140.00
	BJW	Review and analysis of materials and issues related to grant program, and communicate with client regarding same; review and analysis of issues related to public records request and communicate with client regarding same.	2.40	744.00

GENERAL SCHOOL LAW

			Hours	
11/19/2024	ERT	Analysis of public records request and potentially responsive records; draft response regarding the same; additional research regarding request for personal notes; review Board policy regarding class size; analysis of issues regarding the same.	1.30	364.00
	BJW	Review and analyze issues related to public records matter, and communicate with client regarding same.	1.70	527.00
11/20/2024	BJW	Review and analyze communications from parent and related legal issues, and conference call with client to discuss same; conference call with client to discuss issues related to grant program.	0.80	248.00
11/21/2024	BJW	Conference call with client to discuss Board vacancy matters, and review and analyze issues regarding same.	0.50	155.00
11/23/2024	BJW	Draft analysis for client regarding Board vacancy matters.	1.30	403.00
11/25/2024	ERT	Analysis of issues related to upcoming ERD prehearing conference; correspondence with client regarding the same.	0.20	56.00
	BJW	Review and analyze documents and legal issues related to public records matter; conference call with client to discuss same.	0.50	155.00
	JMC	Internal discussion regarding preparation for ERD prehearing conference.	0.20	59.00
11/26/2024	ERT	Review correspondence from client regarding ERD hearing availability; analysis of issues related to public records request; initial review of records regarding the same.	0.50	140.00
	BJW	Review and analysis of issues related to public records request, and communicate with client regarding same; review and analysis of issues related to public records mandamus action, and communicate with client regarding same; conference call with client to discuss personnel matter;	1.80	558.00
11/27/2024	BJW	Review and analyze issues related to mandamus action and participate in conference call with client regarding same.	0.70	217.00
		For Current Services Rendered	22.90	7,054.00

Advances

11/27/2024	Waukesha County Clerk of Courts - Notice of Appearance filing fees - Mathewson and Sallee.			35.96
	Total Advances			35.96
	Total Current Work			7,089.96
	Balance Due			<u>\$7,089.96</u>

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RE: GENERAL SCHOOL LAW

Fees

			Hours	
02/03/2025	BJW	Conference call with client to discuss personnel matter.	0.10	31.00
02/05/2025	BJW	Conference call with client regarding personnel matter.	0.20	62.00
02/06/2025	BJW	Conference call with client regarding policy issues.	0.20	62.00
02/07/2025	BJW	Conference call with client to discuss personnel matter.	0.30	93.00
02/12/2025	BJW	Conference call with client to discuss personnel issue.	0.20	62.00
	JMC	Correspondence with Ms. Vaccaro's counsel regarding discovery responses.	0.10	29.50
02/14/2025	BJW	Draft policy language related to background checks; draft guidance regarding modifications to various policies in response to recent executive actions.	1.80	558.00
02/17/2025	JMC	Correspondence with Ms. [REDACTED]'s counsel regarding discovery responses; review scheduling order.	0.20	59.00
02/18/2025	BJW	Initial review and analysis of issues related to school board member payments; review and analysis of employee medical questionnaire, and communicate with client regarding same; conference calls with client regarding personnel matters.	1.00	310.00
	JMC	Correspondence with Ms. [REDACTED]'s counsel regarding outstanding discovery responses.	0.20	59.00
02/19/2025	BJW	Continued review and analysis of issues related to school board member payments; review and analysis of materials from client and legal issues concerning personnel matter, and communicate with client regarding same.	1.20	372.00
02/20/2025	BJW	Review and analyze issues related to [REDACTED] discrimination complaint matter.	0.30	93.00
	JMC	Correspondence with Ms. [REDACTED]'s counsel regarding discovery/case status; internal strategy and analysis regarding same.	0.30	88.50

GENERAL SCHOOL LAW

			Hours	
02/22/2025	JMC	Draft motion to compel discovery responses and accompanying materials.	1.70	501.50
02/24/2025	ERT	Review and analysis of issues related to public records requests; analysis of dismissal of ERD complaint.	0.50	140.00
	BJW	Review and analysis of issues related to public records request; review and analyze issues related to [REDACTED] discrimination complaint matter; communicate with client regarding various issues.	0.80	248.00
	JMC	Finalize motion to compel; correspondence regarding dismissal of ERD matter; correspondence with/phone call to Dr. Koch regarding same.	1.00	295.00
02/25/2025	JMC	Phone conference with Dr. Koch regarding status of [REDACTED] matter.	0.20	59.00
02/26/2025	BJW	Review and analyze employee grievance and related materials and issues; review and analyze employee correspondence and reach out to employee's attorney; communicate with client regarding same.	1.50	465.00
02/27/2025	BJW	Communicate with client and employee's attorney regarding personnel matter; conference call with client to discuss additional personnel matter.	0.40	124.00
02/28/2025	JMC	Review [REDACTED] ERD dismissal order and transmit same to clients.	0.20	59.00
		For Current Services Rendered	12.40	3,770.50
		Total Current Work		3,770.50
		Balance Due		<u>\$3,770.50</u>

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2631-00013 MATHEWSON PUBLIC RECORDS LITIGATION					
0.00	1,533.00	0.00	0.00	0.00	<u>\$1,533.00</u>

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RE: MATHEWSON PUBLIC RECORDS LITIGATION

Fees

Hours

02/25/2025	JSA	Review Brief in Support of Motion to Dismiss, Petitioners' Brief in Opposition, and Respondents Reply Brief; review Amended Petitioner and Exhibits; draft outline for oral argument on the District's Motion to Dismiss.	4.20	1,533.00
		For Current Services Rendered	4.20	1,533.00
		Total Current Work		1,533.00
		Balance Due		<u>\$1,533.00</u>

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Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00013 MATHEWSON PUBLIC RECORDS LITIGATION					
0.00	6,310.00	0.00	0.00	0.00	<u>\$6,310.00</u>

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Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00008 PUPIL SERVICE MATTERS					
0.00	468.00	0.00	0.00	0.00	<u>\$468.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
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RE: PUPIL SERVICE MATTERS

			<u>Fees</u>	
			Hours	
11/01/2024	RWA	Correspondence with client regarding IDEA complaint response and Section 504 matter; consideration and analysis regarding same.	0.60	216.00
11/04/2024	ERT	Review student Section 504 and notice of suspension; draft abeyance and placement agreement; correspondence with client regarding the same; correspondence with DPI regarding response to IDEA complaint.	2.80	784.00
	RWA	Review and revise expulsion abeyance agreement; consideration regarding same; conferences with client regarding student discipline matter; consideration and analysis regarding same.	1.60	576.00
11/05/2024	RWA	Begin review and analysis of IDEA complaint response draft; correspondence with client regarding student discipline and placement matter; consideration and analysis regarding same.	0.80	288.00
	CAK	Analysis of TRO issues in preparation for upcoming hearing.	0.40	118.00
11/06/2024	ERT	Revise response to IDEA complaint.	0.80	224.00
	RWA	Prepare for and participate in IEP meeting regarding IDEA eligibility; correspondence with client regarding same and regarding student discipline matter; prepare for and participate in conference with client regarding student discipline matter; review and revise draft of IDEA complaint response to DPI; consideration and analysis regarding same.	6.10	2,196.00
11/07/2024	ERT	Draft additional revisions to IDEA complaint response; correspondence with client regarding the same.	0.80	224.00
	RWA	Finalize review and revision of draft IDEA complaint response; consideration and analysis regarding response strategy.	0.80	288.00
11/08/2024	ERT	Finalize response to IDEA complaint; correspondence with DPI regarding the same.	0.30	84.00
	RWA	Review and analysis of student file materials related to IDEA complaint response in preparation for upcoming IEP meeting; consideration and analysis regarding resolution strategies.	0.60	216.00

PUPIL SERVICE MATTERS

			Hours	
11/11/2024	RWA	Correspondence with client regarding student discipline matter; consideration regarding same.	0.20	72.00
11/12/2024	CAK	Review/analyze email from student's GAL regarding injunction hearing; emails with District witnesses in preparation for injunction hearing; telephone conference with GAL.	1.50	442.50
	RWA	Review and analysis of student file materials related to student discipline matter and upcoming injunction hearing; consideration and analysis of Guardian ad Litem settlement proposal related to injunction hearing; consideration and analysis of student discipline matter.	1.20	432.00
11/13/2024	CAK	Meeting with District witness in preparation for injunction hearing; review/analyze GAL concerns and potential response for stipulation; telephone conference with GAL; research case law regarding District's standing to bring injunction; draft update to client.	1.80	531.00
	ERT	Analysis of issues related to intersection of TRO and special education obligations.	0.30	84.00
	RWA	Further consideration and analysis regarding upcoming injunction hearing and resolution offer.	0.60	216.00
11/14/2024	RWA	Prepare for and participate in conference with client team regarding upcoming injunction hearing and resolution offers; consideration and analysis regarding same.	0.50	180.00
	CAK	Conference with clients to discuss settlement proposal on TRO issue; telephone conference and follow up correspondence with student's GAL; correspondence with witnesses to provide additional hearing details.	1.60	472.00
11/15/2024	CAK	Telephone conference with District witness in advance of injunction hearing; review/analyze notes and correspondence with additional witnesses; draft correspondence to GAL.	0.90	265.50
11/18/2024	CAK	Preparation session with two SROs and other District employee in preparation for injunction hearing; begin outline of direct exam questions; telephone conference with student's GAL regarding potential stipulation; draft update to client regarding discussions with GAL; draft follow up communication to GAL regarding discussions.	3.90	1,150.50
	RWA	Correspondence with client regarding student discipline matter and related policies; consideration and analysis regarding same and regarding temporary restraining order and student placement matter.	0.60	216.00
11/19/2024	CAK	Correspondence with GAL and court clerk regarding agreed upon injunction; draft update to clients; draft update to witnesses; revise order for injunction.	1.10	324.50
	HMC	Draft Mukwonago Area School District's Stipulation for Permanent Injunction; draft [REDACTED] Stipulation for Permanent Injunction; draft Mukwonago Area School District's Proposed Order for Permanent Injunction; draft [REDACTED] Proposed Order for Permanent Injunction.	1.80	477.00
11/20/2024	RWA	Prepare for and participate in conference with client and client team regarding upcoming IEP meeting and IDEA complaint; correspondence with client regarding same; consideration and analysis regarding resolution and continuing complaint response strategies.	2.10	756.00

PUPIL SERVICE MATTERS

		Hours	
	CAK Draft update to clients regarding status of stipulation for purposes of informing whether witnesses must attend hearing; correspondence with court clerk regarding when judge will sign injunctions; receipt and analysis of signed injunctions; correspondence with GAL; draft update to clients and all witnesses providing a copy of signed injunctions.	1.10	324.50
	HMC Correspondence to Mukwonago Area School District witnesses and [REDACTED] regarding signed order.	0.50	132.50
11/21/2024	RWA Prepare for and participate in annual IEP meeting related to IDEA complaint; conference with client team regarding same; consideration and analysis regarding ongoing response to IDEA complaint issues and resolution strategies; correspondence with client regarding same.	5.10	1,836.00
11/25/2024	RWA Review and analysis of IDEA complaint decision; correspondence with client regarding same; review and analysis of parent concerns for inclusion in IEP; correspondence with client regarding same.	0.90	324.00
	For Current Services Rendered	41.30	13,450.00
<u>Advances</u>			
11/05/2024	Waukesha County Sheriff - Service of process, Temporary Restraining Order and Notice of Injunction Hearing, upon		60.00
11/05/2024	Waukesha County Sheriff - Service of Process, Motion for DeNovo Review, upon		60.00
	Total Advances		120.00
	Total Current Work		13,570.00
	Balance Due		<u>\$13,570.00</u>

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Please include this page with your remittance.

Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00008 PUPIL SERVICE MATTERS					
0.00	13,450.00	0.00	120.00	0.00	<u>\$13,570.00</u>

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RE: PUPIL SERVICE MATTERS

			<u>Fees</u>		Hours	
02/03/2025	RWA	Conference with client and correspondence with client team regarding student evaluation matters; review and analysis of student file materials regarding same; consideration and analysis regarding same and IDEA complaint decision implementation.			1.10	396.00
02/05/2025	RWA	Conference and correspondence with client regarding student placement matter and student discipline matter; consideration and analysis regarding same.			0.80	288.00
02/06/2025	RWA	Correspondence with client regarding consent for assessments matter; consideration and analysis regarding same.			0.20	72.00
02/10/2025	RWA	Correspondence with client and with WSEMS mediator regarding upcoming mediation; consideration and analysis regarding same.			0.30	108.00
02/11/2025	RWA	Conference and correspondence with client regarding suspension appeal matter; consideration regarding same.			0.20	72.00
02/12/2025	RWA	Correspondence with WSEMS intake coordinator regarding upcoming mediation; consideration regarding same.			0.20	72.00
02/13/2025	RWA	Consideration and analysis of student records in preparation for mediation; correspondence with client regarding WSEMS intake meeting.			0.40	144.00
02/17/2025	RWA	Correspondence with client and with WSEMS intake coordinator regarding mediation; consideration regarding same.			0.20	72.00
02/19/2025	ERT	Initial analysis of due process hearing request.			0.30	84.00
	RWA	Review and analysis of due process hearing request; correspondence with client regarding same; conference with client regarding resolution and litigation strategies, due process hearing preparation; consideration and analysis regarding same.			1.40	504.00

MUKWONAGO AREA SCHOOL DISTRICT

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PUPIL SERVICE MATTERS

			Hours	
02/20/2025	ERT	Draft due process hearing timeline and checklist; analysis of issues regarding the same.	0.60	168.00
	RWA	Consideration and analysis regarding mediator selection and mediation strategy; correspondence with client regarding same.	0.20	72.00
02/21/2025	ERT	Finalize due process hearing timeline and checklist; correspondence with client regarding the same; analysis of issues related to next steps.	0.30	84.00
	RWA	Conference with client regarding upcoming mediation, mediation strategy and upcoming IEP meeting, student placement matter and upcoming IEP meeting; correspondence with client regarding same; correspondence with client regarding potential complaint and parent advocate correspondence; consideration and analysis regarding resolution strategies.	1.40	504.00
02/24/2025	RWA	Correspondence with client regarding potential claims related to parent advocate concerns; conference and correspondence with client regarding student placement matter and upcoming IEP meeting; correspondence with parent attorney regarding same; consideration and analysis regarding resolution strategies and interim placement options.	1.70	612.00
02/25/2025	RWA	Conference with parent attorney regarding upcoming IEP team meeting and student placement agreement; correspondence with client team regarding same; prepare for and participate in IEP team meeting; consideration and analysis regarding resolution strategies.	2.10	756.00
02/26/2025	RWA	Consideration and analysis regarding upcoming mediation.	0.20	72.00
02/28/2025	RWA	Conference with client regarding OCR complaint; initial review of OCR complaint; correspondence with parent advocate regarding OCR complaint; consideration and analysis regarding OCR complaint response and resolution strategies; conference with client team regarding upcoming IEP team meetings; consideration and analysis regarding same.	1.10	396.00
		For Current Services Rendered	12.70	4,476.00
		Total Current Work		4,476.00
		Balance Due		<u>\$4,476.00</u>

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RE: PUPIL SERVICE MATTERS

Fees

			Hours	
12/05/2024	RWA	Correspondence with client regarding DPI complaint decision and corrective action; consideration and analysis regarding same.	0.20	72.00
12/09/2024	RWA	Prepare for and participate in conference with client regarding IDEA complaint implementation; correspondence with client regarding same; consideration and analysis regarding same.	0.80	288.00
12/18/2024	RWA	Correspondence with client regarding special education matter; review and analysis of parent correspondence regarding same; consideration and analysis regarding resolution strategies.	0.30	108.00
		For Current Services Rendered	1.30	468.00
		Total Current Work		468.00
		Balance Due		<u>\$468.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
 PERSONAL & CONFIDENTIAL
 ATTENTION: DR. JOSEPH KOCH
 385 E. VETERANS WAY
 MUKWONAGO, WI 53149

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RE: [REDACTED] DUE PROCESS

Fees

					Hours	
02/21/2025	RWA	L120	A106	Conference with client regarding due process hearing preparation.	0.40	116.00
	RWA	L120	A103	Review and revise due process hearing preparation timeline.	0.30	87.00
	RWA	L120	A104	Consideration and analysis regarding resolution strategies and due process hearing preparation.	0.90	261.00
	RWA	L120	A104	Review and analysis of due process hearing exhibits and related records.	2.30	667.00
02/24/2025	ERT	L120	A104	Additional analysis of issues related to due process hearing request and answer.	1.00	275.00
	ERT	L120	A104	Begin to review records and draft response.	1.00	275.00
	RWA	L120	A104	Consideration and analysis regarding due process hearing preparation and strategy.	0.40	116.00
	RWA	L120	A107	Correspondence with EMC representative regarding due process hearing preparation.	0.20	58.00
	RWA	L120	A106	Conference with client regarding due process hearing preparation and strategy.	0.60	174.00
02/25/2025	ERT	L120	A104	Begin to review student records.	0.50	137.50
	ERT	L120	A106	Conference with client and staff members regarding due process hearing and next steps.	0.70	192.50
	ERT	L120	A103	Continue to draft answer to due process hearing request.	1.40	385.00
	ERT	L120	A103	Draft correspondence to parent regarding resolution session.	0.60	165.00
	RWA	L120	A108	Conference with due process hearing witnesses regarding due process hearing preparation and strategy.	3.20	928.00
02/26/2025	ERT	L120	A103	Finalize correspondence to parent regarding due process resolution session.	0.30	82.50
	ERT	L120	A103	Continue to draft response to due process hearing request.	0.50	137.50
	ERT	L120	A106	Correspondence with client regarding resolution session.	0.30	82.50
	RWA	L120	A104	Review and analysis of parent correspondence related to due process hearing allegations.	0.30	87.00

DUE PROCESS

					Hours	
	RWA	L120	A106	Correspondence with client regarding upcoming resolution session.	0.20	58.00
	RWA	L120	A106	Correspondence with client regarding due process hearing preparation.	0.20	58.00
	RWA	L120	A104	Consideration regarding DPI resolution session outcome form.	0.20	58.00
	RWA	L120	A104	Consideration and analysis regarding resolution and due process hearing strategies.	0.30	87.00
	RWA	L120	A106	Conference with client regarding due process hearing preparation.	0.20	58.00
02/27/2025	ERT	L120	A103	Continue to draft answer to due process hearing request and develop arguments.	2.20	605.00
	ERT	L120	A104	Review student records related to due process hearing request.	1.00	275.00
	RWA	L120	A104	Review and revise draft response to due process hearing request.	1.90	551.00
	RWA	L120	A106	Ongoing correspondence with client regarding parent concerns related to issues in due process hearing request.	0.50	145.00
02/28/2025	ERT	L120	A103	Revise and finalize answer to due process hearing request.	1.30	357.50
	ERT	L120	A108	Correspondence with complainant regarding answer to due process hearing request.	0.20	55.00
	RWA	L120	A106	Conference with client regarding resolution session and due process hearing preparation.	1.00	290.00
	RWA	L120	A104	Consideration and analysis regarding resolution session and due process hearing strategies.	0.50	145.00
	RWA	L120	A103	Continued review, revision and finalization of due process hearing response.	1.80	522.00
				For Current Services Rendered	26.40	7,491.00
				Total Current Work		7,491.00
				Balance Due		<u>\$7,491.00</u>

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L120	Analysis/Strategy	7491.00	0.00
L100	Case Assessment, Development and Administration	7,491.00	0.00

MUKWONAGO AREA SCHOOL DISTRICT
PERSONAL & CONFIDENTIAL
ATTENTION: DR. JOSEPH KOCH
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Please include this page with your remittance.

	Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00008 PUPIL SERVICE MATTERS	0.00	4,476.00	0.00	0.00	0.00	\$4,476.00
2631-00014 [REDACTED] DUE PROCESS	0.00	7,491.00	0.00	0.00	0.00	\$7,491.00
	<u>0.00</u>	<u>11,967.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>\$11,967.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
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Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00013 MATHEWSON PUBLIC RECORDS LITIGATION					
0.00	6,310.00	0.00	0.00	0.00	<u>\$6,310.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
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RE: MATHEWSON PUBLIC RECORDS LITIGATION

			<u>Fees</u>	Hours	
01/16/2025	JSA	Review Petitioners' Response to District's Motion to Dismiss; review issue cited therein; conference to discuss District's responses to records requests and responding to brief; outline issues for Reply Brief.		2.60	949.00
	ERT	Analysis of issues related to response to District's motion; review records previously provided to petitioners; correspondence with client regarding the same.		1.00	280.00
	BCB	Review Petitioners' Response to District's Motion to Dismiss; review cited authority in response brief; strategy conference to discuss reply brief arguments; outline issues for Reply Brief.		2.10	556.50
01/17/2025	ERT	Review correspondence from client regarding response to public records request.		0.20	56.00
	JSA	Conference to discuss documents produced to Mathewson; review arguments in Mathewson response brief; begin drafting reply brief.		1.20	438.00
01/21/2025	BCB	Review/analysis of Wisconsin procedural law to determine whether or not District should file a motion to strike, and the implications a motion to strike would have on reply briefing.		1.60	424.00
	JSA	Review research memo or motion to strike; strategy conference to discuss Reply Brief in support of motion to dismiss and addressing Petitioners' attempts to assert facts not found in the Petition.		1.20	438.00
01/23/2025	BCB	Outline Reply brief.		0.90	238.50
	BCB	Begin drafting reply brief in support of motion to dismiss.		2.10	556.50
01/24/2025	JSA	Review and revise Reply Brief in support of Motion to Dismiss; finalize same for filing.		2.80	1,022.00
	BCB	Continue drafting reply brief in support of motion to dismiss.		3.50	927.50
	BCB	Review/revise reply brief in support of motion to dismiss.		1.60	424.00
		For Current Services Rendered		20.80	6,310.00

MUKWONAGO AREA SCHOOL DISTRICT

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MATHEWSON PUBLIC RECORDS LITIGATION

Total Current Work

6,310.00

Balance Due

\$6,310.00

MUKWONAGO AREA SCHOOL DISTRICT
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	Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00099 GENERAL SCHOOL LAW	0.00	4,398.00	0.00	0.00	0.00	\$4,398.00
2631-08287 GENERAL BENEFITS	0.00	510.00	0.00	0.00	0.00	\$510.00
	<u>0.00</u>	<u>4,908.00</u>	<u>0.00</u>	<u>0.00</u>	<u>0.00</u>	<u>\$4,908.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
PERSONAL & CONFIDENTIAL
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RE: GENERAL BENEFITS

Fees

Hours

01/09/2025	MJF	Review final OPEB minutes and documents; begin steps to prepare closing opinion letter.	0.50	170.00
01/16/2025	MJF	Prepare draft opinion letters for recent OPEB transactions and documents.	1.00	340.00
		For Current Services Rendered	1.50	510.00
		Total Current Work		510.00
		Balance Due		<u>\$510.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
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RE: GENERAL SCHOOL LAW

			<u>Fees</u>	
			Hours	
01/02/2025	JMC	Review discovery response materials in [REDACTED] ERD matter; revise and update same.	2.20	649.00
01/03/2025	ERT	Finalize response to ERD discovery request; correspondence with client regarding the same; analysis of issues related to substitute teacher correspondence; conference with client regarding the same; initial analysis of issues related to unemployment appeal.	0.60	168.00
	JMC	Continue to review and revise discovery responses in [REDACTED] ERD matter.	2.30	678.50
01/06/2025	BJW	Review and analyze issues related to school board election; draft contract termination notice.	1.30	403.00
	JMC	Research and analysis regarding school board election question.	0.60	177.00
01/07/2025	BJW	Review and analysis of vendor contract issues, and communicate with client regarding same.	0.50	155.00
	JMC	Draft and transmit discovery to complainant in [REDACTED] ERD matter.	1.20	354.00
01/08/2025	BJW	Review and analysis of issues related to vendor agreement and school board election; and conference all with client regarding same.	0.30	93.00
01/09/2025	ERT	Research and analysis of issues related to election question; draft memorandum regarding the same.	1.30	364.00
	BJW	Review and analyze issue related to property tax bill related to sale of property; draft legal opinion regarding election issues; conference call with client to discuss parent issue.	1.70	527.00
01/15/2025	BJW	Review and analyze materials related to unemployment compensation appeal.	0.30	93.00
01/16/2025	BJW	Prepare for and participate in conference call with client regarding unemployment compensation hearing; review and analyze issues related to public records matter.	1.00	310.00

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GENERAL SCHOOL LAW

			Hours	
01/28/2025	BJW	Conference call with client regarding personnel matter.	0.20	62.00
	JMC	Correspondence with Equal Rights Division regarding missing scheduling order.	0.20	59.00
01/29/2025	BJW	Conference call with client regarding personnel matter; review and analyze unemployment compensation decision, and communicate with client regarding same.	0.50	155.00
01/30/2025	JMC	Review correspondence regarding scheduling order; update calendar accordingly.	0.30	88.50
01/31/2025	BJW	Conference call with client to discuss personnel matter.	0.20	62.00
		For Current Services Rendered	14.70	4,398.00
		Total Current Work		4,398.00
		Balance Due		<u>\$4,398.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
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Previous Balance	Fees	Expenses	Advances	Payments	Balance
2631-00008 PUPIL SERVICE MATTERS					
0.00	9,601.00	0.00	0.00	0.00	<u>\$9,601.00</u>

MUKWONAGO AREA SCHOOL DISTRICT
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RE: PUPIL SERVICE MATTERS

			<u>Fees</u>	
			Hours	
01/06/2025	ERT	Research and analysis of issues related to special education teacher licensure; correspondence with client regarding the same; initial consideration and analysis of issues related to student behavior and discipline.	1.20	336.00
	RWA	Conference with client regarding Section 504 training, licensure matter, least restrictive environment requirements; consideration and analysis regarding same and preparation for Section 504 training.	1.20	432.00
01/07/2025	ERT	Analysis of issues related to upcoming Section 504 training; draft Section 504 training materials.	1.70	476.00
01/08/2025	ERT	Analysis of issues related to talking points regarding least restrictive environment and student rights.	0.60	168.00
	RWA	Consideration and analysis of legal standards related to least restrictive environment standards and related guidelines; correspondence with client regarding additional services and IDEA complaint response; consideration and analysis regarding same.	0.50	180.00
01/09/2025	ERT	Review and revise principal talking points related to student discipline and least restrictive environment; correspondence with client regarding the same.	0.40	112.00
	RWA	Prepare for and participate in IEP team meeting regarding additional services consideration in response to IDEA complaint decision; review and analysis of updated legal research regarding additional services; prepare outline of legal standards regarding additional services and differences from compensatory education services for IEP team meeting; consideration and analysis regarding compliance and resolution strategies; review and revise draft guidelines regarding least restrictive environment requirements; continued preparation of outline materials for upcoming training regarding Section 504; consideration regarding same.	3.90	1,404.00
01/10/2025	ERT	Revise Section 504 training materials.	0.60	168.00
	BCB	Review/analysis of recent Title IX court decisions to determine impact the court decision has on Title IX requirements.	2.30	609.50

PUPIL SERVICE MATTERS

Hours

01/12/2025	RWA	Review and revise Section 504 materials in preparation for legal update regarding same; further consideration and analysis regarding impact of federal court decision vacating 2024 regulations on pending litigation.	1.30	468.00
	ERT	Finalize Section 504 training materials; correspondence with client regarding the same.	0.40	112.00
01/13/2025	BCB	Review/analysis of the Administrative procedures act to determine the impact the APA has on First Amendment concerns raised in recent Title IX case from Kentucky.	1.90	503.50
	RWA	Prepare for and present at staff training regarding Section 504 and presidential transition updates; conference with client regarding pending litigation and impact of Title IX decision, response to parent concerns/correspondence and continuing resolution strategies; consideration and analysis regarding resolution and litigation strategies, implementation of IDEA complaint decision.	5.40	1,944.00
01/14/2025	BCB	Review/analysis of federal law and executive order case law to determine the impact executive orders have on statutory and case law when they conflict; specifically as an executive order pertains to transgender rights in schools.	2.40	636.00
	RWA	Review and recommend revisions to draft IEP documents in IDEA complaint decision implementation matter; consideration and analysis regarding compliance strategies.	0.50	180.00
01/16/2025	RWA	Correspondence and conference with client regarding parent response to IEP team resolution of IDEA complaint and decision implementation; review and analysis of student file materials regarding same; correspondence with DPI consultant regarding decision implementation; consideration and analysis regarding same and regarding resolution strategies.	1.00	360.00
01/17/2025	RWA	Correspondence and conference with DPI consultant regarding compliance with DPI complaint decision and related resolution efforts; correspondence with client regarding same; consideration and analysis regarding implementation and resolution strategies.	0.90	324.00
01/20/2025	RWA	Review student file materials related to parent concerns; consideration and analysis regarding same; correspondence with client regarding same.	0.30	108.00
01/21/2025	RWA	Prepare for and participate in conference with client team regarding impact of executive orders; consideration and analysis regarding same; correspondence with client regarding same.	1.40	504.00
01/24/2025	RWA	Ongoing correspondence with client team regarding executive order compliance; consideration regarding same.	0.30	108.00
01/29/2025	RWA	Correspondence with client regarding IDEA complaint decision implementation and IEE matter; correspondence with clients regarding executive order implementation strategies; consideration and analysis regarding same.	0.80	288.00
01/30/2025	RWA	Correspondence with client team regarding executive order implementation; review and analysis of parent advocate concerns; correspondence with client regarding same in preparation for upcoming IEP meeting and IDEA complaint decision compliance.	0.50	180.00

PUPIL SERVICE MATTERS

	<u>Hours</u>	
For Current Services Rendered	29.50	9,601.00
Total Current Work		9,601.00
Balance Due		<u>\$9,601.00</u>