

# MWH

## LAW GROUP

Madison Metropolitan School District  
Attn: Sherry M. Terrell-Webb  
545 West Dayton Street  
Madison, WI 53703

Date: February 18, 2021  
Account #: XXXXXXXXXX  
Invoice #: 15110

**Invoice Total: \$10,009.00**

**RE: Internal Investigation**

### For Professional Services Rendered:

Date	TK	Professional Services	Hours	Rate	Amount
01/11/2021	ELA	Multiple correspondence to and from the client regarding investigation assignment.	0.20	\$190.00	\$38.00
01/15/2021	EKH	Correspondence with Sherry Terrell Webb regarding investigation; review of news reports regarding previous camera issue.	0.60	\$265.00	\$159.00
01/18/2021	EKH	Working with Sherry Terrell Webb regarding investigation issues; continued review of background research on camera issues.	0.50	\$265.00	\$132.50
01/19/2021	EKH	Call with Ms. Terrell-Webb regarding investigation.	0.60	\$265.00	\$159.00
01/20/2021	EKH	Review and analysis of documents received in connection with investigation	1.80	\$265.00	\$477.00
01/20/2021	TLT	Preliminary analysis of factual overview to determine scope of investigation to be conducted.	0.20	\$150.00	\$30.00
01/20/2021	ELA	Internal meeting to discuss investigation assignments for MMSD matter.	0.30	\$190.00	\$57.00
01/20/2021	ELA	Review and analyze file material received from MMSD in anticipation of investigating camera incident.	2.40	\$190.00	\$456.00
01/20/2021	EKH	Correspondence with Eric Kestin regarding investigation.	0.30	\$265.00	\$79.50
01/21/2021	TLT	Review MMSD investigation report and email file relating to camera installation to identify timeline and key witnesses.	0.60	\$150.00	\$90.00
01/21/2021	EKH	Strategy call with Eric Andrews and Tracy Tompkins; working with Eric Keslin on interviews; continued review of policies and investigation records.	2.20	\$265.00	\$583.00
01/21/2021	TLT	Preliminary review of the Madison Metropolitan School District Employee Handbook to identify policies relevant to the placement of cameras as a tool of investigation.	0.20	\$150.00	\$30.00

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01/21/2021	TLT	Designate fact witnesses to be interviewed, strategy of interview order, and scope of interviews.	0.40	\$150.00	\$60.00
01/21/2021	EKH	Working with Eric Kestin on witness interview logistics; review of interview notes; strategy discussion with Eric Andrews and Tracy Tompkins.	0.80	\$265.00	\$212.00
01/21/2021	ELA	Appear for internal meeting to discuss matter strategy.	0.30	\$190.00	\$57.00
01/21/2021	ELA	Multiple correspondence to and from the client regarding interviews.	0.20	\$190.00	\$38.00
01/22/2021	TLT	Telephone call with [REDACTED] relative to conducting fact finding interview.	0.20	\$150.00	\$30.00
01/22/2021	ELA	Review and analyze multiple documents received from the client related to the investigation.	0.40	\$190.00	\$76.00
01/22/2021	TLT	Draft outline of general interview questions.	0.50	\$150.00	\$75.00
01/22/2021	TLT	Review voice mail message left by [REDACTED] claiming to have information related to the investigation and research identity of [REDACTED]	0.40	\$150.00	\$60.00
01/22/2021	EKH	Review of communications with witnesses; correspondence with Tracy Tompkins and Eric Andrews; review of message from witness.	1.20	\$265.00	\$318.00
01/25/2021	TLT	Analysis of status of investigation and scope of report to be drafted.	0.10	\$150.00	\$15.00
01/25/2021	EKH	Preparation for witness interview of [REDACTED]	1.40	\$265.00	\$371.00
01/25/2021	EKH	Correspondence with Eric Kestin; review of records and policies relating to investigation.	1.70	\$265.00	\$450.50
01/26/2021	EKH	Preparation for witness interviews.	0.80	\$265.00	\$212.00
01/26/2021	TLT	Review email from Eric Kestin providing additional information in preparation for conducting fact finding interviews.	0.10	\$150.00	\$15.00
01/26/2021	TLT	Review documents and prepare for fact finding interviews of [REDACTED] and [REDACTED]	0.80	\$150.00	\$120.00
01/26/2021	TLT	Electronic correspondence from [REDACTED] providing camera policies and guidelines.	0.10	\$150.00	\$15.00
01/26/2021	TLT	Conduct fact finding interview of [REDACTED].	0.90	\$150.00	\$135.00
01/26/2021	ELA	Appear for interview with [REDACTED]	0.50	\$190.00	\$95.00
01/26/2021	TLT	Multiple electronic correspondence exchanges with [REDACTED] relative to conducting fact finding interview.	0.10	\$150.00	\$15.00
01/26/2021	TLT	Review background and prepare for fact finding interviews of [REDACTED], [REDACTED], [REDACTED] including outline of scope of interview.	0.70	\$150.00	\$105.00

01/26/2021	TLT	Begin outlining investigation report.	0.20	\$150.00	\$30.00
01/26/2021	EKH	Conduct fact interview of [REDACTED].	0.70	\$265.00	\$185.50
01/26/2021	TLT	Conduct fact finding interview of [REDACTED].	0.70	\$150.00	\$105.00
01/26/2021	EKH	Review interview notes.	0.60	\$265.00	\$159.00
01/27/2021	EKH	Correspondence with Sherry Terrell-Webb regarding investigatory issues; preparation for interviews; interview of [REDACTED]; working with Eric Keslin regarding witness interviews.	2.80	\$265.00	\$742.00
01/27/2021	TLT	Analysis of information obtained from witness interviews to date and scope of additional witness interviews to be conducted.	0.20	\$150.00	\$30.00
01/27/2021	ELA	Attend interview with [REDACTED]	0.70	\$190.00	\$133.00
01/27/2021	TLT	Conduct fact finding interview of witness [REDACTED].	0.60	\$150.00	\$90.00
01/27/2021	ELA	Review and analyze documents received from [REDACTED]	0.30	\$190.00	\$57.00
01/27/2021	TLT	Review BOE policies and guidelines governing the installation of surveillance cameras.	0.30	\$150.00	\$45.00
01/27/2021	TLT	Conduct fact finding interview of [REDACTED].	0.80	\$150.00	\$120.00
01/27/2021	TLT	Conduct fact finding interview of [REDACTED].	0.10	\$150.00	\$15.00
01/27/2021	ELA	Multiple correspondence to and from the client regarding investigation.	0.20	\$190.00	\$38.00
01/27/2021	TLT	Prepare for fact finding interview of [REDACTED] including drafting outline of scope of interview and key questions.	0.20	\$150.00	\$30.00
01/27/2021	TLT	Electronic correspondence from Eric Kestin discussing the fact finding interview of [REDACTED]	0.10	\$150.00	\$15.00
01/27/2021	TLT	Electronic correspondence from [REDACTED] providing investigation related documents.	0.10	\$150.00	\$15.00
01/28/2021	TLT	Analysis of interviews to date and determine scope of investigation going forward.	0.40	\$150.00	\$60.00
01/28/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED].	0.80	\$150.00	\$120.00
01/28/2021	TLT	Review media and the principal's email release of information.	0.20	\$150.00	\$30.00
01/28/2021	TLT	Analyze and draft portions of Introduction, Background Information, and MWH Investigation sections of the Report.	1.70	\$150.00	\$255.00

01/28/2021	TLT	Telephone conference with Sherry Terrell-Webb, Deirdre Hargrove-Kriehoff, and Emery Harlan relative to status and strategy.	0.40	\$150.00	\$60.00
01/28/2021	TLT	Draft interview outlines of key information for each witness and prepare for fact finding interviews of [REDACTED], [REDACTED], [REDACTED], [REDACTED] and [REDACTED].	0.80	\$150.00	\$120.00
01/28/2021	EKH	Correspondence with Eric Andrews and Tracy Tompkins regarding witness interviews; preparation for interview of [REDACTED]; interviewing [REDACTED]; status update call with Ms. Webb-Terrell and Ms. Hargrove-Kriehoff.	3.20	\$265.00	\$848.00
01/28/2021	ELA	Multiple correspondence to and from the client regarding interviews and investigation.	0.20	\$190.00	\$38.00
01/29/2021	EKH	Preparation for and participation in interview of [REDACTED], [REDACTED] and [REDACTED]; correspondence with Tracy Tompkins and Eric Andrews regarding status and report; working on scheduling final interviews; review and analysis of additional records.	3.50	\$265.00	\$927.50
01/29/2021	TLT	Identify diagrams and photographs for discussion during fact finding interview of [REDACTED] and prepare set for distribution.	0.10	\$150.00	\$15.00
01/29/2021	TLT	Electronic correspondence to [REDACTED] providing a set of diagrams and photographs to be discussed during fact finding interview.	0.10	\$150.00	\$15.00
01/29/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED].	0.60	\$150.00	\$90.00
01/29/2021	TLT	Draft summary of key points in [REDACTED]'s interview for use in [REDACTED]'s interview.	0.20	\$150.00	\$30.00
01/29/2021	TLT	Electronic correspondence from [REDACTED] relative to his fact finding interview.	0.10	\$150.00	\$15.00
01/29/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED].	0.70	\$150.00	\$105.00
01/29/2021	TLT	Electronic correspondence to [REDACTED] requesting that he provide his investigation related text messages and photographs.	0.10	\$150.00	\$15.00
01/29/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED].	1.10	\$150.00	\$165.00
01/29/2021	TLT	Summarize key information from [REDACTED]'s interview for use in interviews of additional witnesses.	0.30	\$150.00	\$45.00
01/29/2021	TLT	Conduct fact finding interview of [REDACTED].	0.50	\$150.00	\$75.00
01/29/2021	TLT	Add additional discussion section topics to the draft Report.	0.10	\$150.00	\$15.00
01/29/2021	TLT	Electronic correspondence from [REDACTED] providing additional investigation related information and documents.	0.10	\$150.00	\$15.00
01/29/2021	TLT	Electronic correspondence from [REDACTED] providing additional case related information and documents.	0.10	\$150.00	\$15.00

01/29/2021	ELA	Conduct fact finding interview with [REDACTED].	0.80	\$190.00	\$152.00
01/29/2021	TLT	Electric correspondence from [REDACTED] providing additional information and documents.	0.10	\$150.00	\$15.00
01/29/2021	ELA	Conduct fact finding interview with [REDACTED].	0.60	\$190.00	\$114.00
01/30/2021	EKH	Review of correspondence from Eric Kestin.	0.30	\$265.00	\$79.50

**For Professional Services Rendered**

**47.20      \$10,009.00**

**Fee Recap**

TK	Name	Rate	Hours	Amount
EKH	Emery K. Harlan	\$265.00	23.00	\$6,095.00
TLT	Tracy L. Tompkins	\$150.00	17.10	\$2,565.00
ELA	Eric L. Andrews	\$190.00	7.10	\$1,349.00

Total Current Fees      \$10,009.00  
**Total Current Charges      \$10,009.00**

Previous Balance      \$0.00  
Payments Applied      \$0.00

**BALANCE DUE      \$10,009.00**

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# MWH

## LAW GROUP

Madison Metropolitan School District  
Attn: Sherry M. Terrell-Webb  
545 West Dayton Street  
Madison, WI 53703

Date: March 9, 2021

Account #: [REDACTED]

Invoice #: 15299

**Invoice Total: \$19,979.50**

**RE: Internal Investigation**

### For Professional Services Rendered:

Date	TK	Professional Services	Hours	Rate	Amount
02/01/2021	ELA	Multiple communications with [REDACTED] regarding evidence in possession.	0.20	\$190.00	\$38.00
02/01/2021	TLT	Conduct fact finding conference of [REDACTED]	1.10	\$150.00	\$165.00
02/01/2021	TLT	Electronic correspondence from [REDACTED] providing additional information and documents for investigation.	0.10	\$150.00	\$15.00
02/01/2021	ELA	Attend interview with [REDACTED]	0.70	\$190.00	\$133.00
02/01/2021	ELA	Review and analyze documents and evidence received from multiple MMSD interviewees.	0.30	\$190.00	\$57.00
02/01/2021	ELA	Multiple correspondence to and from the client regarding interviews.	0.10	\$190.00	\$19.00
02/01/2021	ELA	Attend interview with [REDACTED]	0.60	\$190.00	\$114.00
02/01/2021	TLT	Review facts and create interview outline for [REDACTED], [REDACTED], [REDACTED], and [REDACTED]	0.60	\$150.00	\$90.00
02/01/2021	TLT	Analysis of investigation interviews and determine next steps.	0.50	\$150.00	\$75.00
02/01/2021	ELA	Attend interview with [REDACTED]	0.60	\$190.00	\$114.00
02/01/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED]	0.60	\$150.00	\$90.00
02/01/2021	ELA	Draft MMSD Report of Investigation.	4.60	\$190.00	\$874.00
02/01/2021	TLT	Prepare for and conduct fact finding investigation of [REDACTED]	0.60	\$150.00	\$90.00

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02/01/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED].	0.50	\$150.00	\$75.00
02/01/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED].	0.50	\$150.00	\$75.00
02/01/2021	TLT	Electronic correspondence from [REDACTED] relative to fact finding interview.	0.10	\$150.00	\$15.00
02/01/2021	TLT	Electronic correspondence from [REDACTED] providing additional information relevant to the investigation.	0.10	\$150.00	\$15.00
02/01/2021	TLT	Electronic correspondence from [REDACTED] confirming his attendance at the fact finding conference.	0.10	\$150.00	\$15.00
02/01/2021	EKH	Preparation for witness interviews; working with Eric Andrews and Tracy Tompkins on investigation issues; conducting interviews of [REDACTED] and [REDACTED].	3.40	\$265.00	\$901.00
02/02/2021	TLT	Draft outline for interview of [REDACTED].	0.20	\$150.00	\$30.00
02/02/2021	TLW	Electronic communication with City of Madison Police Department regarding records request.	0.10	\$90.00	\$9.00
02/02/2021	TLT	Review all notes from fact finding interviews in preparation for drafting Report of Investigation.	0.70	\$150.00	\$105.00
02/02/2021	TLT	Prepare for and conduct fact finding interview of [REDACTED].	1.40	\$150.00	\$210.00
02/02/2021	TLT	Review additional documents and email provided by witness interviewed to date.	0.70	\$150.00	\$105.00
02/02/2021	TLT	Draft correspondence to the Madison Police Department requesting its investigation file.	0.20	\$150.00	\$30.00
02/02/2021	TLT	Electronic correspondence to Eric Kestin requesting status of scheduling interview of [REDACTED].	0.10	\$150.00	\$15.00
02/02/2021	EKH	Continued work on investigation; review of material from MMSD; correspondence with Eric Andrews.	1.60	\$265.00	\$424.00
02/02/2021	TLT	Electronic correspondence from [REDACTED] providing screenshots of the Facebook post discussing the surveillance cameras in question.	0.10	\$150.00	\$15.00
02/02/2021	TLT	Review Facebook posts made about the camera situation by MMSD personnel forwarded by [REDACTED].	0.20	\$150.00	\$30.00
02/02/2021	TLT	Electronic correspondence with [REDACTED] discussing any documentary evidence in [REDACTED] possession relative to [REDACTED] and the camera installation.	0.10	\$150.00	\$15.00
02/02/2021	TLT	Draft the Report of Investigation.	1.20	\$150.00	\$180.00
02/02/2021	TLT	Review prior interview notes and draft outline of additional questions for [REDACTED] second fact finding interview.	0.20	\$150.00	\$30.00
02/02/2021	ELA	Continue drafting MMSD Report of Investigation.	2.20	\$190.00	\$418.00

02/02/2021	TLT	Review electronic correspondence from Eric Kesten discussing the identity of the involved Forward Electric personnel.	0.10	\$150.00	\$15.00
02/02/2021	ELA	Multiple correspondence to and from the client regarding interview requests.	0.20	\$190.00	\$38.00
02/03/2021	TLT	Conduct fact finding conference of [REDACTED] and draft summary of key findings.	0.70	\$150.00	\$105.00
02/03/2021	TLT	Review other fact investigation interview notes and draft additional questions for the second fact finding interview of [REDACTED].	1.20	\$150.00	\$180.00
02/03/2021	TLT	Electronic correspondence with [REDACTED] discussing fact finding.	0.10	\$150.00	\$15.00
02/03/2021	TLT	Draft outline of questions and prepare for fact finding interview of [REDACTED].	0.30	\$150.00	\$45.00
02/03/2021	TLT	Conduct fact finding interview of [REDACTED].	0.70	\$150.00	\$105.00
02/03/2021	TLT	Conduct second fact finding interview of [REDACTED] and summarize key findings.	0.60	\$150.00	\$90.00
02/03/2021	ELA	Attend interview with [REDACTED]	0.70	\$190.00	\$133.00
02/03/2021	ELA	Continue drafting MMSD Report of Investigation.	3.80	\$190.00	\$722.00
02/03/2021	EKH	Work on interview of Forward Electric personnel; interview of [REDACTED].	1.20	\$265.00	\$318.00
02/03/2021	ELA	Review and analyze multiple exhibits produced by interviewees.	0.20	\$190.00	\$38.00
02/04/2021	ELA	Continue drafting MMSD Report of Investigation.	4.10	\$190.00	\$779.00
02/04/2021	TLT	Draft Report of Investigation.	7.20	\$150.00	\$1,080.00
02/04/2021	EKH	Preparation for witness interviews; conduct interview of [REDACTED] and [REDACTED]; work on arranging interview of Forward Electric employees; review and comment to draft report; work on issues relating to [REDACTED].	2.60	\$265.00	\$689.00
02/04/2021	ELA	Multiple communications with the client and interviewees regarding investigation.	0.20	\$190.00	\$38.00
02/04/2021	ELA	Attend interview of [REDACTED].	0.70	\$190.00	\$133.00
02/04/2021	TLT	Prepare for and draft outline of questions for the [REDACTED] fact finding interview.	0.20	\$150.00	\$30.00
02/04/2021	TLT	Conduct fact finding interview of [REDACTED] and summarize key points.	0.70	\$150.00	\$105.00
02/04/2021	TLT	Draft interview outline and conduct fact finding interview of [REDACTED].	0.60	\$150.00	\$90.00



02/04/2021	TLT	Electronic correspondence from [REDACTED] relative to contact with Forward Electric for fact finding purposes.	0.10	\$150.00	\$15.00
02/04/2021	TLT	Electronic correspondence from [REDACTED] relative to supplemental fact finding interview.	0.10	\$150.00	\$15.00
02/05/2021	ELA	Multiple correspondence to and from the client and MMSD employees regarding fact investigation.	0.30	\$190.00	\$57.00
02/05/2021	EKH	Provide comments to draft report; conduct interview of [REDACTED]; review of sworn statement from [REDACTED]	1.40	\$265.00	\$371.00
02/05/2021	ELA	Additional interview with [REDACTED]	0.40	\$190.00	\$76.00
02/05/2021	TLT	Draft Report of Investigation.	4.00	\$150.00	\$600.00
02/05/2021	TLT	Conduct fact finding interview of [REDACTED]	0.40	\$150.00	\$60.00
02/05/2021	TLT	Conduct second fact finding interview of [REDACTED] and summarize key information.	0.50	\$150.00	\$75.00
02/05/2021	TLT	Analysis of scope of investigation in light of additional information provided by [REDACTED] in [REDACTED] second interview and determine next steps in the investigation.	0.40	\$150.00	\$60.00
02/05/2021	TLT	Draft outline of interview questions for [REDACTED]	0.10	\$150.00	\$15.00
02/05/2021	TLT	Conduct fact finding interview of [REDACTED]	0.40	\$150.00	\$60.00
02/05/2021	TLT	Telephone call to Sue Fichtel, Records Custodian for the City of Madison Police Department, requesting that the records request be expedited.	0.10	\$150.00	\$15.00
02/05/2021	TLT	Multiple electronic correspondence exchanges with [REDACTED] relative to fact finding interview.	0.20	\$150.00	\$30.00
02/05/2021	TLT	Electronic correspondence from [REDACTED] relative to identifying employees involved in the camera installation.	0.10	\$150.00	\$15.00
02/05/2021	TLT	Electronic correspondence from [REDACTED] relative to interviewing Forward Electric employees involved in the camera installation.	0.10	\$150.00	\$15.00
02/05/2021	TLT	Telephone call from [REDACTED] requesting a time for the fact finding interview.	0.10	\$150.00	\$15.00
02/07/2021	TLT	Draft Statement of [REDACTED]	1.80	\$150.00	\$270.00
02/07/2021	TLT	Draft Report of Investigation.	0.80	\$150.00	\$120.00
02/08/2021	ELA	Revise [REDACTED] sworn statement.	0.50	\$190.00	\$95.00
02/08/2021	ELA	Attend interview with [REDACTED]	0.40	\$190.00	\$76.00

02/08/2021	TLT	Telephone call from Dave Barbian of the Madison Police Department responding to request for expedition of the requested investigation materials.	0.10	\$150.00	\$15.00
02/08/2021	EKH	Email correspondence with Ms. Terrell-Webb regarding investigation and emails; review of executed statement; review of supplemental interview notes.	1.10	\$265.00	\$291.50
02/08/2021	TLT	Draft outline of second interview of [REDACTED].	0.10	\$150.00	\$15.00
02/08/2021	TLT	Conduct second fact finding interview of [REDACTED] and summarize key findings.	0.40	\$150.00	\$60.00
02/08/2021	TLT	Draft interview outline for second interview of [REDACTED].	0.20	\$150.00	\$30.00
02/08/2021	TLT	Draft Report of Investigation.	0.20	\$150.00	\$30.00
02/08/2021	TLT	Multiple electronic correspondence exchanges with [REDACTED] relative to fact investigation.	0.20	\$150.00	\$30.00
02/08/2021	TLT	Multiple electronic correspondence exchanges with [REDACTED] relative to fact investigation.	0.20	\$150.00	\$30.00
02/08/2021	TLT	Multiple electronic correspondence exchanges with [REDACTED] relative to fact investigation.	0.20	\$150.00	\$30.00
02/09/2021	TLT	Electronic correspondence from Sherry Terrell-Webb approving the draft of [REDACTED] statement.	0.10	\$150.00	\$15.00
02/09/2021	TLT	Electronic correspondence from Sherry Terrell-Webb discussing status of production of [REDACTED] email file.	0.10	\$150.00	\$15.00
02/09/2021	TLT	Prepare for and conduct supplemental fact finding interview of [REDACTED].	0.30	\$150.00	\$45.00
02/09/2021	TLT	Draft Report of Investigation.	3.10	\$150.00	\$465.00
02/09/2021	ELA	Multiple correspondence to and from the client regarding emails.	0.20	\$190.00	\$38.00
02/09/2021	TLT	Electronic correspondence from Sherry Terrell-Webb advising that a search did not yield any additional email with [REDACTED].	0.10	\$150.00	\$15.00
02/10/2021	EKH	Work on Report issues; review of witness interview notes; review of [REDACTED] email and investigation materials.	1.80	\$265.00	\$477.00
02/10/2021	TLT	Draft Report of Investigation (now totaling 22 single spaced pages).	5.90	\$150.00	\$885.00
02/10/2021	ELA	Attend Supplemental Interview with [REDACTED].	0.40	\$190.00	\$76.00
02/10/2021	ELA	Multiple correspondence to and from [REDACTED].	0.10	\$190.00	\$19.00
02/10/2021	ELA	Revise statement of [REDACTED].	0.10	\$190.00	\$19.00
02/10/2021	ELA	Revise MMSD Investigation Report.	1.60	\$190.00	\$304.00

02/10/2021	TLT	Conduct second supplemental fact finding interview of [REDACTED]	0.40	\$150.00	\$60.00
02/11/2021	EKH	Work with Tracy Tompkins on Report; review of additional records obtained during investigation.	1.50	\$265.00	\$397.50
02/11/2021	TLT	Review electronic correspondence from [REDACTED] to identify changes to be made to [REDACTED] interview summary based on [REDACTED] feedback to [REDACTED] written statement.	0.10	\$150.00	\$15.00
02/11/2021	TLT	Draft Report of Investigation.	4.30	\$150.00	\$645.00
02/11/2021	ELA	Continue revision of MMSD Report.	1.80	\$190.00	\$342.00
02/11/2021	ELA	Multiple correspondence to and from [REDACTED] regarding statement.	0.20	\$190.00	\$38.00
02/12/2021	EKH	Additional edits to investigation report; review of revised report and additional interview materials.	1.00	\$265.00	\$265.00
02/12/2021	TLT	Electronic correspondence from Sherry Terrell-Webb relative to review of draft Report of Investigation.	0.10	\$150.00	\$15.00
02/18/2021	EKH	Continued work on investigation; communication with Tracy Tomkins and Sherry Terrell-Webb; review of additional records.	1.40	\$265.00	\$371.00
02/18/2021	TLT	Review the MMSD's Bullying and Harrassment policies to determine if either were violated during the surveillance [REDACTED]	0.20	\$150.00	\$30.00
02/18/2021	TLT	Review the police report excerpt provided by MMSD, [REDACTED]'s interview notes, and [REDACTED] interview notes to determine scope of discrepancy between the statements about knowledge at the time.	0.50	\$150.00	\$75.00
02/18/2021	ELA	Review and analyze Madison Police Report regarding East High School Camera incident.	0.50	\$190.00	\$95.00
02/19/2021	TLT	Analysis of additional information to be included in the Report of Investigation.	0.10	\$150.00	\$15.00
02/19/2021	TLT	Analysis of conducting supplemental interviews of [REDACTED] and [REDACTED]	0.10	\$150.00	\$15.00
02/19/2021	TLT	Electronic correspondence with [REDACTED] requesting supplemental interview.	0.10	\$150.00	\$15.00
02/19/2021	TLT	Electronic correspondence to [REDACTED] requesting supplemental interview.	0.10	\$150.00	\$15.00
02/22/2021	TLT	Review the [REDACTED] and additional questions posed by Sherry Terrell-Webb for incorporation into the final report.	0.20	\$150.00	\$30.00
02/22/2021	TLT	Prepare for supplemental interviews of [REDACTED] and [REDACTED]	0.20	\$150.00	\$30.00
02/22/2021	TLT	Conduct supplemental interview of [REDACTED], post-interview review of police report, and analysis of continued discrepancy.	0.40	\$150.00	\$60.00
02/22/2021	EKH	Review of witness interview narratives; update investigation report; preparation for additional witness interviews; communication with Sherry Terrell-Webb;	2.90	\$265.00	\$768.50

review of police department materials obtained from  
MMSD.

02/23/2021	TLT	Electronic correspondence to [REDACTED] relative to [REDACTED] statement to the Madison Police Department.	0.10	\$150.00	\$15.00
02/23/2021	TLT	Draft Report of Investigation.	2.70	\$150.00	\$405.00
02/23/2021	TLT	Electronic correspondence to [REDACTED] relative to contents of the police report.	0.10	\$150.00	\$15.00
02/23/2021	TLT	Conduct supplemental interview of [REDACTED]	0.20	\$150.00	\$30.00
02/23/2021	TLT	Review the Madison Police Department Case Report for discrepancies and information potentially contradictory to information obtained through witness interviews.	0.60	\$150.00	\$90.00
02/23/2021	EKH	Conduct interview of [REDACTED] correspondence with [REDACTED]	0.30	\$265.00	\$79.50
02/24/2021	TLT	Draft Report of Investigation.	2.30	\$150.00	\$345.00
02/24/2021	TLT	Conduct third supplemental interview of [REDACTED].	0.10	\$150.00	\$15.00
02/24/2021	LSK	Edit Report of Investigation.	1.40	\$190.00	\$266.00
02/25/2021	EKH	Review of revised investigation report; preparation for call with [REDACTED] participation in call.	1.70	\$265.00	\$450.50
02/25/2021	TLT	Attend conference with Sherry Terrell-Webb, Richard McGregory, and Deidre Hargrove-Krieghoff discussing investigation findings and recommendations.	0.50	\$150.00	\$75.00
02/25/2021	TLT	Attend conference with Sherry Terrell-Webb, Richard McGregory, Deidre Hargrove-Krieghoff, and Carlton Jenkins in the afternoon reporting investigation findings and discussing recommendations.	0.90	\$150.00	\$135.00
02/25/2021	TLT	Draft Report of Investigation.	1.00	\$150.00	\$150.00
02/26/2021	EKH	Edit Report of Investigation.	1.20	\$265.00	\$318.00

**For Professional Services Rendered**

**108.30      \$19,979.50**

**Fee Recap**

TK	Name	Rate	Hours	Amount
EKH	Emery K. Harlan	\$265.00	23.10	\$6,121.50
TLW	Tammy L. Williams	\$90.00	0.10	\$9.00
TLT	Tracy L. Tompkins	\$150.00	58.00	\$8,700.00
ELA	Eric L. Andrews	\$190.00	25.70	\$4,883.00
LSK	Logan S Kraus	\$190.00	1.40	\$266.00

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Total Current Fees	\$19,979.50
<b>Total Current Charges</b>	<b><u>\$19,979.50</u></b>

Previous Balance	\$10,009.00
Payments Applied	\$0.00

<b>BALANCE DUE</b>	<b>\$29,988.50</b>
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ok to pay  
GLEN 5/14/21

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# MWH

## LAW GROUP

Madison Metropolitan School District  
Attn: Sherry M. Terrell-Webb  
545 West Dayton Street  
Madison, WI 53703

Date: April 14, 2021  
Account #: [REDACTED]  
Invoice #: 15461

**Invoice Total: \$159.00**

**RE: General Advice, Counsel and Representation**

### For Professional Services Rendered:

Date	TK	Professional Services	Hours	Rate	Amount
03/12/2021	EKH	Call with Sherry Terrell-Webb regarding investigation and update.	0.60	\$265.00	\$159.00
For Professional Services Rendered			0.60		\$159.00

### Fee Recap

TK	Name	Rate	Hours	Amount
EKH	Emery K. Harlan	\$265.00	0.60	\$159.00

Total Current Fees	\$159.00
<b>Total Current Charges</b>	<b>\$159.00</b>

Previous Balance	\$4,439.50
Payments Applied	\$0.00
<b>BALANCE DUE</b>	<b>\$4,598.50</b>

*OK to pay  
BWW 5/14/21*

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West Des Moines, IA

# MWH

## LAW GROUP

Madison Metropolitan School District  
Attn: Sherry M. Terrell-Webb  
545 West Dayton Street  
Madison, WI 53703

Date: April 14, 2021  
Account #: [REDACTED]  
Invoice #: 15508

**Invoice Total: \$1,873.00**

**RE: Internal Investigation**

### For Professional Services Rendered:

Date	TK	Professional Services	Hours	Rate	Amount
03/03/2021	EKH	Review of draft Report; correspondence with Sherry Terrell-Webb; review of media accounts of issue at District.	0.80	\$265.00	\$212.00
03/11/2021	EKH	Correspondence with Sherry Terrell-Webb; preparation for call regarding finalizing report.	0.60	\$265.00	\$159.00
03/12/2021	TLT	[REDACTED]	0.10	\$150.00	\$15.00
03/15/2021	TLT	[REDACTED]	1.80	\$150.00	\$270.00
03/15/2021	TLT	Draft Timeline of Events section in the Report of Investigation.	0.50	\$150.00	\$75.00
03/15/2021	TLT	Electronic correspondence from the Madison Police Department relative to its Case Report.	0.10	\$150.00	\$15.00
03/15/2021	EKH	Continued work on report; review and analysis of full police report material.	1.60	\$265.00	\$424.00
03/16/2021	TLT	Draft final edits to the updated draft of the Report of Investigation.	0.40	\$150.00	\$60.00
03/16/2021	EKH	[REDACTED] review of notes from discussion with Sherry Terrell-Webb; continued review and analysis of police material.	2.20	\$265.00	\$583.00
03/17/2021	TLT	Finalize updated Report of Investigation and prepare for submission to the MMSD.	0.10	\$150.00	\$15.00
03/17/2021	TLT	Review the Madison Police Department Case Report.	0.30	\$150.00	\$45.00
<b>For Professional Services Rendered</b>			<b>8.50</b>		<b>\$1,873.00</b>

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## Fee Recap

TK	Name	Rate	Hours	Amount
EKH	Emery K. Harlan	\$265.00	5.20	\$1,378.00
TLT	Tracy L. Tompkins	\$150.00	3.30	\$495.00

Total Current Fees	\$1,873.00
<b>Total Current Charges</b>	<b>\$1,873.00</b>

Previous Balance	\$29,988.50
Payments Applied	\$10,009.00 - Pd

<b>BALANCE DUE</b>	<b>\$21,852.50</b>
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*due*

## Payments and Adjustments

Date	Ref.	Description	Amount
03/22/2021	Chk 1146291	Payment for Invoice 15110	\$10,009.00

*Out to pay  
AUM 5/14/21*

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# MWH

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## LAW GROUP

July 29, 2020

**VIA ELECTRONIC MAIL**

**E-mail:** [snterrellwebb@madison.k12.wi.us](mailto:snterrellwebb@madison.k12.wi.us)

Sherry M. Terrell-Webb  
General Counsel  
Madison Metropolitan School District  
545 West Dayton Street  
Madison, Wisconsin 53703

**Re: Letter of Engagement and Agreement for General Advice,  
Counsel and Representation**

Dear Ms. Terrell-Webb:

We are pleased you have chosen MWH Law Group LLP ("MWH" or the "firm") to assist you by providing general advice, counsel and representation. The purpose of this letter is to briefly document the terms of our agreed-upon representation. The terms outlined herein will be in effect for the duration of our engagement, unless you are notified of specific changes.

Scope of Representation. The legal services which we will provide may include review and preparation of agreements; research; investigation; advice and counsel, unless otherwise agreed in writing. The work that will be performed by MWH under this Agreement does not include any legal services required for any other purpose. MWH makes no promises or guarantees to you about the outcome of the representation undertaken by the firm.

Conflict of Interest Check. Our firm's internal conflicts check reveals no conflict of interest due to us representing you.

Fees. Our billing rate is as follows:

- \$265 for Senior Partners
- \$250 for Junior Partners
- \$190-225 for Associates
- \$150 for Paralegals

Expenses. In addition to the hourly legal fees described above, you have agreed to pay the reasonable costs and expenses we will incur on your behalf in connection with this matter. Such expenses may include, to the extent applicable, filing fees, charges for photocopying, transcripts of legal proceedings, long distance phone charges, postage, travel charges and computer-assisted

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July 29, 2020

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legal research, as necessary.

Billing. We will bill you for fees and expenses on a monthly basis with payment due within 30 days of receipt of the invoice. We reserve the right to withdraw representation if monthly bills are not promptly paid.

If at any time during our representation you have questions about any matters or your monthly billing statement, please contact me. I will be happy to discuss your concerns and respond to your questions. If I am unavailable, please contact Kerrie Murphy, our managing partner, for assistance.

If we are required to engage a collection agency or an attorney to collect an unpaid account balance, you agree that the non-prevailing party will be required to pay the reasonable attorney's fee and costs of the prevailing party.

Governing Law. The validity of this Agreement and of any of its terms or provisions, as well as the rights and duties of the parties under this Agreement, shall be construed pursuant to and in accordance with Wisconsin law.

Termination of Relationship. We have the right to withdraw as your attorneys at any time in the event of your non-cooperation or non-payment, or other such valid cause, and, of course, you are at liberty to terminate this arrangement at any time you desires. Upon termination, you will be entitled to the immediate return of all funds in our Client Trust Account less accrued fees and costs as of the date of the termination.

Full Cooperation. To enable us to effectively represent you, it is necessary for us to have full cooperation and disclosure from you. This may include you fully and accurately disclose to us all facts that may be relevant or that we may otherwise request, and to make yourself reasonably available to attend meetings, conferences, hearings and other proceedings. Your responsibilities will also include, to the extent applicable, approving negotiation, discovery and litigation strategy, approving causes of action and parties to any litigation and determining acceptable terms of any compromise, settlement, or agreement.

File Retention and Destruction. After our services conclude, MWH will, upon your request, deliver the file for this matter to you, along with any funds or property of yours in our possession. We will retain copy of the file in electronic format for a period of six (6) years after this matter is closed. At any point during the six (6) year period, you may request delivery of the file. If you do not request delivery of the file for this matter before the end of the six (6) year period, we will have no further obligation to retain the file and may, at our discretion, destroy it.

We will keep you informed of the progress of this matter and any significant developments as they occur. You are always welcome to call if you have any questions about the status of your case.

You are encouraged to discuss the terms of this Engagement Letter with independent counsel of your choice. Please call me to discuss any aspect of this Engagement.

If the terms and conditions set forth in this letter are satisfactory, please sign and date this letter and return to me for my file. Please retain a copy for your records.

July 29, 2020

Page 3

We greatly appreciate the opportunity to work with you and provide legal services to you. You are a valued client and we look forward to working with you. Thank you for retaining MWH, and we look forward to representing you.

Sincerely,

/s/ Emery K. Harlan

Emery K. Harlan

Accepted and Agreed as of July 30, 2020.

**MADISON METROPOLITAN SCHOOL DISTRICT**

By: 

Sherry Terrell-Webb  
General Counsel

Billing Address:

Brenda France

Attention

545 W Dayton

Street

MADISON, WI 53703

City, State, Zip

bfrance@madison.k12.wi.us

Email

608.443.1868

Phone Number