



Also Admitted: Arizona & Massachusetts

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March 1, 2006

STATEMENT- Time Spent- Avery (2003-06)

2003 (54.8 hours)

		<u>HOURS</u>
10/23/03	Conf. K. Casey-WIP & review clips of Avery case	0.3
10/27/03	Conf. K. Findley-WIP re civil case advise	0.5
10/29/03	Review press clips and check imm. law re: sheriff-prep UWLS Mtg.	3.0
10/30/03	Conf. WIP & Avery family-retain for exclusive eval.-fact and law prep for SMG	6.0
10/31/03	Rev. police acct. project cases, Qualif imm.; Conf. SMG; ret. letter to S.A.	2.4
11/03/03	Cases & Chi-7th Cir.-pol. acct. & conf SMG	3.7
11/04/03	Leg research-Brady cases-prosec imm & calls K.F., S.A., S.M.G. re 01/85 charges, Gundrum, A.G. & P.Kinne	3.1
11/05/03	Conf. S.A. re: Kinne; conf Kinne	0.2
11/06/03	Conf. Kinne; res re. Sh. Liability	1.1
11/10/03	Confs. Gingras, Kinne, Glynn	0.5
11/11/03	Conf. Avery re: Kinne, Gingras	0.2
11/14/03	Leg. res @ UWM re prosec. malp. & obstruction	2.5

Of Counsel

Hawks, Quindel, Ehlke & Perry, S.C.

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EXHIBIT

F

		<u>HOURS</u>
12/03/03	P.D. reports; review; legal res. on prosec. misconduct	1.5
12/10/03	Res. G. Allen & Prep A.G. conf and inv. rep.	0.3
12/11/03	Calls K.F., S.A., S.G. re A.G. report; Gundrum comm.	0.5
12/12/03	Mtg., prep. A.G. & file w/ S.G.-all matters; Mrs. Avery; Chi case file	4.5
12/16/03	Confs. & meeting w/Avery family & S.G.; media prep, coord reply w/ K.F. and J. Geske	6.2
12/17/03	A.G. report & confs. K.F., S.G., S.A., defense, media	0.9
12/18/03	A.G. report-facts & compare prior reports/documents	4.5
12/19/03	Res. immuns. re. A.G. report; S.G. conf; S.A. case summary	3.7
12/21/03	Madison-prep. S.A. legis. appearances	2.5
12/20/03	Conf. S.G. re: A.G. rept. defense discovery usage	0.2
12/22/03	S.A. app @ spec. leg. comm. & interviews	6.5

2004 (156.1 hours)

01/10/04	Prep & meet S.G. & files	4.0
01/12/04	Prep docs and conf. S.A.	1.5
01/13/04	State law claims, defenses, limits. laws & caps	1.5
01/19/04	Leg. research-st. of lims, claims, indemnity, state legal responsibility	2.0
01/20/04	Confs. S.G., K.F., J.G., S.A. re: mtg. P.B.	1.5
01/23/04	Conf. S.G. re press & S.A. claims	1.5

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		<u>HOURS</u>
02/04/04	Leg. res. re: A.G. rept. & prosec. Imm.	5.0
02/05/04	Leg. res. Re: Man. liability & prosec. imm. transfer	6.0
02/17/04	P.B. test, and U.W.L.S. for res. documents/files	7.0
02/24/04	U.W.L.S. docs file to S.G. for integrate case files @ GFA	6.0
03/09/04	Eval. docs & res. & prep. S.G. merits	3.0
03/12/04	<u>Brady</u> & Wis Law-S.G. conf. and theories/liab.	1.0
03/16/04	Leg. res. re: entity liab. & coll. sct & est res. jud.	4.0
03/29/04	Cont. leg. res. Re: jud. imm & Judge Hwood motions rulings & coll. est/res judicata	1.5
04/07/04	Eval. & draft & S.G. re S.A. op. letter & K	1.6
04/08/04	Op. letter eval. & K. Out to S.A.	0.5
04/19/04	Conf. P.B. re. S.A. & inv. & sheriff focus and drawing; eval § 1985 (2)	2.0
04/26/04	Confs. S.G., P.B., & J.G. & S.A. re: 04/08 letter; confs. WIP & K.F.	1.7
05/10/04	T. conf. S.G. re: P.B. & J.G.	0.2
05/17/04	T. conf. S.G. re: cancel P.B. & J.G.	0.2
06/17/04	Confs. WIP, S.G. & K.F. re: S of W comp. bd. draft & issues	0.2
06/23/04	Relate drafted fed. comp. to S of W comp. bd. claim	1.0
06/28/04	Conf. res. bd. claim; & liab. facts	2.4
07/15/04	Confs. S.G. & J.G. re: mtg w/ P.B. & S.A.	0.5
08/13/04	Drafting & S.G. re criminal aspects	1.5
08/19/04	Drafting and prep P.B. leg and 1306	1.0

		<u>HOURS</u>
08/23/04	Prep. mtg P.B. & J.G./sources of info.	3.0
08/24/04	Mtg. S.G., J.G., P.B.-all matters	4.8
09/02/04	Prep conf. @ U.W.L.S. re: WCB & complaints & conf. S.G.	2.5
09/03/04	Conf. U.W.L.S. re: C.B. & complaint fed.case	5.0
09/09/04	Rev. docs file & conf. K.F. & S.G.	3.5
09/10/04	L. research & prep. conf.	2.0
09/13/04	Prep. conf. w. attorneys/Court	2.0
09/16/04	Rev. file docs & relate to comp.facts	10.0
09/17/04	Rev. police reports & relate to comp. facts	5.0
09/20/04	Draft comp. & compare A.G. & P.B. & clips	2.0
09/21/04	S.G. conf. & redraft comp.-Brady derivative theories	1.5
09/23/04	WCB & S.G. conf. & drafts	1.6
09/27/04	Drafting-WCB & Fed Ct & Strategies re Sequencing and conf S.G.	4.0
09/28/04	All supp. docs. review & drafts for Ct & WSCB	4.3
10/01/04	More drafting & strategies re WSCB & Fed Ct.	1.5
10/04/04	Final drafting prep. and rewrites	2.6
10/05/04	Final draft & confs. S.G. & S.A. & T.K.	1.7
10/06/04	All docs & forms & filing final drafts	3.9
10/07/04	Finalize all filings & media rels.	2.1
10/08/04	Coordinate all media distribution & contacts	2.5

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		<u>HOURS</u>
10/11/04	Medical records review; documents organize & review; media organize	1.7
10/12/04	Conf. S.A., release docs., file action, invest. docs. for S.A.	2.0
11/04/04	Records request & file documents	0.3
11/05/04	Records & corresp. & conf. K.F.	0.5
11/08/04	Corres. & recs. S.A.	0.3
11/09/04	Corres. & recs. & service	0.2
11/10/04	Records search & P.B. evidence files	0.5
11/21/04	File prep. & D of C recs.	3.0
11/26/04	Disc. prep & recs.	1.5
11/27/04	Conf. S.G. & all records & strategy	2.0
11/29/04	Conf. S.G. & discovery plan & med. records, pysch records, & presentence records	3.7
11/30/04	D of C records review; disc plan & conf. S.G.	4.0
12/02/04	Madison-WSCB Hrg & S.A., K.F., WIP Strategy Plan	5.0
12/03/04	WSCB Petition, Legislation for S.A. and rel to suit	2.3
12/06/04	All files org. & prep. disc.	0.5
12/07/04	Presentence discovery-D of C Hazelwood	0.4
12/08/04	Research PTSD damages	0.3
12/13/04	Corres. Ct & defense answers	1.0
12/14/04	Corres. Ct & conf. S.G. re: jud. Disqual.	0.7
12/16/04	Presentence S.A. & discovery	1.0

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		<u>HOURS</u>
12/20/04	Defense in case; legis. & poss. settlement	0.5
12/22/04	Texas case research-similar situation	0.3
12/28/04	Scheduling order & res. comp. cases	0.6
2005 (534.5 hours)		
01/01/05	Happy New Year- Conf. S.G. re: discov. plan, sch. order & legis. w. K.F.	1.8
01/03/05	S.G. & K.F. & confs re: legal relationship between WSCB, Fed. Ct. & S of W Party	0.4
01/10/05	Prep. docs; plan schedule & conf. S.G.	0.8
01/11/05	Prep. witnesses list & docs. for p.trial work	1.5
01/12/05	Rev. & prep. docs for ptrial	1.0
01/20/05	Leg. res. re. exculpatory evidence definition; file-work on docs; party defense	2.2
01/21/05	WIP docs. files & pldgs. & pretrial prep.	3.0
01/24-25/05	Pretrial docs review & prep	6.5
02/07/05	Docs preparation & review & conf. all issues S.G.	3.3
02/08/05	Mtg. S.G., prep for Attys. conf., strategy planning	5.6
02/09/05	Confs. Defense and S.G. re: pretrial plan	3.4
02/15/05	Prep. Court report for schedule order	1.0
02/17/05	Confs. S.G. & investigator-prep fact dev.	1.5

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		<u>HOURS</u>
02/18/05	Case plan, confs defense counsel & S.G.	1.5
02/21/05	Confs. J.G. & S.G. & sch. order	1.2
02/22/05	Final drafting-sch. order-Ct. & counsel	1.0
02/23/05	Final draft-S.O. to Court	2.3
02/24/05	Rule 26 report prep & confs S.A. & S.G.	1.5
02/25/05	Rule 26 docs & disclosures	3.0
02/26/05	Rule 26 docs & WIP docs	6.0
02/27/05	Rule 26 WIP docs and report	8.0
02/28/05	Rule 26 rept. prep & S.G. conf.	3.0
03/01/05	Final Rule 26 filing, prep for 03/03 conf with Ct.	2.5
03/02/05	Confs and email defense counsel and S.G. re: Rule 26 repts & prep for 03/03 conf. W/ Ct.	3.8
03/03/05	Conf w/ Ct. & review w. S.G.	1.0
03/04/05	Confs S.G. & defense counsel re: discovery and locales	1.6
03/07/05	Confs S.G. and defense counsel re: disc. defense docs. controls	0.4
03/08/05	Documents & discovery, all sources-conf. S.G.	1.2
03/09/05	Documents, inspection, confs. w. S.G., K.F., & A.A.	0.5
03/10/05	All issues, strategy conf. S.G.	1.7
03/21/05	Docs authorizations, privileges, legal research	1.0
03/22/05	Authorizations, witness addresses	1.5
03/23/05	Discovery plan & prep S.G.	1.0
03/24/05	All documents discovery to defense; search witnesses	0.5

		<u>HOURS</u>
04/01/05	Conf. S.G. re: scheduling, docs., legal research, police misconduct workshop, authorizations	2.0
04/02/05	Plan deposition locales Madison & Manitowoc	0.5
04/06/05	Pleadings annotations-all facts and rel. legal issues	0.5
04/09/05	Drafting for depositions in Madison	3.0
04/11/05	Confs. Fox, A.G. office & service	2.5
04/12/05	Confs. A.G. attys re: investigation	1.5
04/13-14/05	Calls & drafts-A.G. scheduling	1.7
04/27/05	All dep. prep., ct. repr., & Madison	6.0
04/28/05	File org. for depositions and docs, correlate A.G. & W.I.P.	1.4
04/29/05	Prep A.G. discovery & depositions.	1.8
05/02/05	Docs review for A.G., search for WPD Investigators, Conf. K.F.	1.7
05/03/05	S.G., M.F., A.G. office, confs defense counsel re: A.G. discovery	3.9
05/04/05	Review M.Cty. Sh. & D.A. docs	6.0
05/07/05	Conf S.G. re: A.G. depositions/docs	2.7
05/09/05	Prep docs & depositions-A.G.	8.0
05/10/05	Prep depositions re: A.G. report & inv. notes	5.5
05/11/05	Prep depositions and docs-A.G.	12
05/12/05	Depositions A.G. and prep depositions	10.5
05/13/05	Depositions A.G.-confs. S.G., M.F., J.S.O.	7.0
05/14/05	Debrief A.G. depositions & strategy	1.5

		<u>HOURS</u>
05/17/05	SPD offices & docs search	1.1
05/18/05	Docs review Man. Cty & legal res. re: Bergner & city	2.7
05/19/05	Prep & strategy conf. S.G.	2.6
05/21/05	01/85 SPD file re: S.A.	2.0
05/24/05	Legal research re: city, and SPD trial & app.cases	2.5
05/25/05	City, PD & depos. plans	3.4
05/26/05	Org. ex & docs file	1.5
05/31/05	Leg. res. on Brady & Police-new cases re scope	5.0
06/01/05	File prep. for police docs & MPD witnesses	1.6
06/02/05	File work MPD docs & witnesses	2.7
06/06/05	Prep & Mtg. S.G. re: witnesses, police records, city-county rels. and state law	2.7
06/08/05	Legal res. City-County rel.-state law	0.8
06/09/05	Police/Sheriff coop & documents	1.2
06/13-15/05	Subpoenas, police records, all depts., all docs	9.0
06/18/05	S.G. meeting re: disc. & entities issues	2.3
06/20/05	Corres. counsel re: invs. & witnesses	2.2
06/21/05	Conf. S.G. re: employees, indisp. party, Fed. Ct. opinion Bembenek	2.6
06/22/05	Discovery, conf. call, leg. research HCRCLL rev.	2.7
06/23/05	Discovery, SPD docs, indisp. pty. defense	1.2
06/27/05	Indisp. pty, City of Manitowoc legal issues, sched. depts.	1.5
06/28/05	Docs prep. re: S.A. & G.Allen & police records research	3.2

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		<u>HOURS</u>
06/29/05	Defense's 1 st Ints. & RFPD & privileges	1.4
06/30/05	Leg. res. re: ind. pty & joinder of State/City	2.7
07/05/05	Police docs & depts. prep-S.G.	1.5
07/06/05	Conf. counsel for Muni Police & prep. depts.	6.0
07/07/05	All records custodians depts. prep & police counsel	3.2
07/08/05	Witness lists & invs. & depositions strategies	2.9
07/09/05	Conf. S.G. & ints, RFPDs, privileges A.G. & Rohrer	3.0
07/10/05	Conf. & prep. for police depts & A. Avery re: witnesses	4.5
07/11/05	SPD documents & prep. Rohrer documents & prep.	8.0
07/12/05	D.A., City, D of J & docs review	8.0
07/13/05	Records depts; WSCB & 1983 suit rel, Two Rivers recs.	8.0
07/14/05	Depositions police witnesses & disc. docs. issues	12.0
07/15/05	City Records issues & prep.	3.0
07/27/05	Corres., docs, city discovery	6.5
07/28/05	Conf. SG re: disc & city	1.5
07/29/05	Legal res. re: city & prep. depts.	5.2
08/01/05	Bolgert exs. & prep. disc. of Bolgert and crim. motions	8.0
08/02/05	Prep. depts. & rev. w.statements	4.4
08/04/05	Depositions police & inspect D.A. records	10.0
08/05/05	Depositions police, insp. D.A. records, inv. Beilke	7.8
08/09/05	Prep files fr. exhs. & witns. & doc review	1.6

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		<u>HOURS</u>
08/10/05	Mtg. S.G. re: city witnesses & disc. strategies	3.7
08/11/05	File prep; docs exchange; correspondence defense counsel	4.0
08/22/05	Prep depositions. Bolgert, Beilke, Peterson, Badker, Dvorak, review records for depositions.	2.8
08/23/05	S.G. conferences & disc prep	4.9
08/24/05	Depositions & depositions prep	8.5
08/25/05	Depositions & stipulations re scheduling	10.0
08/30/05	Documents org. & prep. depositions.	2.7
09/08/05	Files prep & org. & conf. S.G. re: cont. disc.	2.8
09/12-13/05	Review file; all legal research; res. jud. & interv. cause-conf. S.G.	8.0
09/14/05	Org. exhibits; conf. S.G. & new pldgs.	6.4
09/16/05	Disc. prep. & depositions.-file org, fact review	1.9
09/20/05	Depositions. review	0.5
09/21/05	Disc & depositions. prep.	3.7
09/22/05	Docs & depositions	12.0
09/26/05	Disc & depositions. prep.	5.3
09/28/05	Inv. reports & transcripts review	5.1
10/01/05	Conferences S.G. & depositions. prep.	2.7
10/03/05	Depositions. prep & plans	1.6
10/04/05	Depositions. prep & plans	4.3
10/05/05	Depositions. scheduling-conferences K.F. & S.G.	2.2

		<u>HOURS</u>
10/06/05	Deps. prep	1.9
10/07/05	Deps. prep. & service	3.5
10/10/05	Deps. prep.	3.6
10/11/05	Depositions	8.0
10/12/05	Deps. prep.	3.3
10/13/05	Depositions & plan schedule S.G.	11.0
10/14/05	S.G. conference re: discovery	2.5
10/18/05	Disc. prep & scheduling	2.4
10/19/05	Disc. prep & scheduling	0.4
10/20/05	Subpoenas, confs., witnesses, prep & tapes	3.0
10/24/05	Prep Bergner, Kusche	3.0
10/25/05	Bergner & Kusche prep	6.7
10/26/05	Kusche dep & Bergner ints.	12.0
10/27/05	Research on Kusche ex. and composites	1.5
10/28/05	Research Allen photos/police files & Kusche composite	6.5
10/30/05	Docs review MPD & legal res. on City	5.0
10/31/05	Ex. 154, disc prep. & am. complaint drafting	3.8
11/01/05	Dep, RFPD, XI Am Immunity & res.ex. 154	6.2
11/02/05	Ex. 154, prep deps, am. compl & City & 1986	4.3
11/05/05	SMG & SA & missing woman reports	3.0
11/07/05	Dep prep. Kocourek, motion & pldgs re: am.compl. & SA investigation	8.2

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		<u>HOURS</u>
11/08/05	Deps. prep. & S.A. investigation	6.5
11/16/05	Abate depositions-all counsel	0.5
11/17/05	Abate sch. depos.-all counsel, research	0.5
11/19/05	Confs. counsel & SG re: abate strategies & inv.	1.2
11/21/05	Conf prep. for SA & sch.	0.8
11/30/05	Legal research re: assgn. claims & survival & prep. stip.	1.1
12/06/05	S.A. Prelim. Hrg. & confs. Family re: civil case	8.0
12/07/05	Confs re: prelim. & rel. to civil case	0.5
12/08/05	Civil case-am. comp & city liability	2.9

2006 (8.3 hours)

01/03/06	Review all matters & prep. for settlement negs. w SG	1.2
01/04/06	Settlement discussions, R.P., C.C., & S.G.	0.5
01/07/06	S.G. & settle-all issues R.P.	1.5
01/09/06	S.G. & settle-all issues R.P.	1.5
01/13/06	S.G. & R.P. settlement R.P.	0.2
01/16/06	S.G. & settlement talks R.P.	0.3
01/17/06	S.G. & settlement, D.A. aspects, C.C.	1.2
01/18/06	S.G. & settlement discussions	0.4
01/19/06- 02/06/06	Confs S.G., S.A., M.F., J.S.O., R.P. re settlement and continuing jurisdiction	1.5

TOTAL HOURS: 753.70

Amount: \$226,110.00