



1155 Brewery Park Blvd, Ste 200
Detroit, Michigan 48207
313-446-1530
Tax I.D. 38-1879991

April 15, 2025

Invoice 642447

Charles Widmaier
Tyrone Township
123 Brighton Lake Rd., Ste. 205
Brighton, MI 48116



Re: *In Re: Chris Ropeta*
Claim #:

Client 8126
Matter 1

For Legal Services Rendered Through 3/31/2025

Date	Timekpr	Description of Services Performed	Hours
03/05/25	BTIGA	Initial analysis and review of complaint for superintending control as filed by plaintiff for possible arguments and avenues of response.	.60
03/05/25	BTIGA	Outline response and potential defenses and arguments against superintending control, including standing, the requirements of superintending control, and the merits of plaintiff's arguments.	.60
03/05/25	BTIGA	Analyze court rules and statutes related to jurisdiction for superintending control cases and court rule related to superintending control to determine elements and possible arguments against plaintiff.	.80
03/05/25	BTIGA	Analyze cases related to standing and timing of injury as related to superintending control complaints after a removal from a municipal commission.	1.00
03/05/25	BTIGA	Analyze cases related to superintending control to discern elements for plaintiff and potential defenses for seeking dismissal.	1.60
03/05/25	DS	Confer with appellate partner B. Tigay to continue initial assessment of the pleading filed by petitioner Repeta to streamlining Mr. Tigay's analysis and preparation of a brief in response to the Complaint for Superintending Control.	.40
03/05/25	DS	Conduct initial analysis of Petitioner Ropeta's Complaint for Superintending Control, with attachments, to assess specific nature of the dispute and the potential availability of rebuttal factual and legal argument points to approximate the scope of the briefing project needed to respond to the pleading in circuit court effectively and timely.	.80
03/06/25	BTIGA	Discussion with attorney JJG regarding case posture and strategy in written response in preparation for client.	.40
03/06/25	BTIGA	Call with JJG and township attorney Mr. Widmaier to discuss case background and written response.	.40
03/06/25	BTIGA	Analyze court rule related to superintending control and derivative cases with attention to alternative remedies for party seeking superintending control as part of merits argument and standing argument.	.60
03/06/25	BTIGA	Additional arguments analysis from trial court pleadings and orders in other cases involving superintending control for additional persuasive arguments.	.70
03/06/25	BTIGA	Analyze cases related to judicial nature of the planning commission as it relates to applicability of court rule on superintending control and as to merits arguments	.90

		based on standards applicable in quasi judicial proceedings.	
03/06/25	BTIGA	Analyze cases related to merits arguments on whether petitioner has shown the two required elements for superintending control and analogous cases discussing nature of proceedings.	1.40
03/06/25	BTIGA	Analyze cases cited by petitioner on procedural issues and on merits issue, including case and line of cases related to sufficiency of "charging document" and arguments related to alleged deficiency.	1.60
03/06/25	JJG	Conference with appellate specialist Benjamin Tigay regarding meeting with Township Attorney	.40
03/06/25	JJG	Participation in meeting with Township Attorney	.40
03/06/25	JJG	Preliminary review of Complaint and order forwarded by Township Attorney	.60
03/07/25	BTIGA	Analyze complaint for potential allegations related to implication of political question elements.	.40
03/07/25	BTIGA	Analyze cases related to availability of other legal remedies when responding to a complaint for superintending control..	.60
03/07/25	BTIGA	Analyze plaintiff's complaint with specific attention to any alleged injury from plaintiff for part of standing analysis and argument.	.60
03/07/25	BTIGA	Analyze cases related to plaintiff's requirement to show a failure to perform a clear legal duty and potential analogous cases with removal.	.70
03/07/25	BTIGA	Prepare portions of brief in opposition, including standard of review specific to superintending control and part of first argument related to standing.	.90
03/07/25	BTIGA	Prepare and finalize standing argument, including illustrative case and references to alleged injury in complaint as part of an actual injury.	1.20
03/07/25	BTIGA	Analyze cases related to potential new argument related to political question doctrine as defense to superintending control.	1.30
03/07/25	JJG	Correspondence from / to Township Attorney Charles Widmaier regarding proposed agenda	.20
03/07/25	JJG	Correspondence with enclosures x 5 from Township Attorney Widmaier regarding Township communications, etc.	.50
03/10/25	BTIGA	Prepare final argument, arguing for dismissal of the action because of the political question doctrine and unique nature of the proceedings.	.70
03/10/25	BTIGA	Organize arguments and response brief for cohesion and clarity and preparation of introduction based on final disposition of brief arguments.	.80
03/10/25	BTIGA	Prepare statement of facts based on client materials and plaintiff's pleadings, establishing the proceedings and necessary background for the court given the nature of the unique proceedings.	.80
03/10/25	BTIGA	Analyze materials provided, including resolutions, charges, and emails and text messages, and compare materials and charges to those items referenced and quoted in plaintiff's complaint.	1.10
03/10/25	BTIGA	Analyze cases related to review of superintending control or quasi judicial proceedings for use in merits arguments and substantial evidence arguments in response brief.	1.10
03/10/25	BTIGA	Prepare second argument on elements of superintending control and arguments for dismissal based on plaintiff's failure to establish the necessary elements.	1.20
03/10/25	BTIGA	Prepare third argument section of response brief, with arguments on the merits of plaintiff's claims as to the charges and arguments on the merits of review of those charges based on the posture of proceedings.	1.40
03/11/25	BTIGA	Analyze additional materials and Board meeting minutes and resolutions for potential use as exhibits in support of arguments in response brief.	.70
03/11/25	BTIGA	Analyze plaintiff's complaint and other Board documents with specific attention to things mentioned at township board meetings and arguments made by plaintiff	.90

		through his attorney.	
03/11/25	BTIGA	Review and analysis of two separate Township Board of Trustee hearings that included testimony and discussion of plaintiff and plaintiff's charges.	2.20
03/12/25	BTIGA	Organization of arguments and revisions to brief with attention to simplifying the issues for the judge given the unique nature of superintending control proceedings.	.80
03/12/25	BTIGA	Review of client materials and potential necessary exhibits and comparison of exhibits to items quoted and referenced in plaintiff's complaint for potential arguments based on any inconsistency in plaintiff's version of documents.	.90
03/12/25	JJG	Correspondence to Township Attorney Widmaier regarding requested review of proposed brief	.20
03/12/25	ZBOWM	Conducted a detailed review and analysis of Plaintiff's Amended Complaint to identify the legal and factual basis of Plaintiff's claims, evaluated potential defenses, and assessed the implications for overall case strategy.	.40
03/13/25	BTIGA	Reorganization of arguments and edits to response brief with focus on facts and suggested edits from client and review of response in advance of filing.	.90
03/13/25	JJG	Telephone call with Township Attorney regarding final revisions to brief in opposition to request for order of superintending control	.20
03/13/25	JJG	Telephone call x 2 from Township Treasurer regarding status of filing of brief in opposition to request for order for superintending control and oral argument	.20
03/13/25	JJG	Lengthy telephone call from / to Sarah Dollman Jersey regarding brief in opposition to motion for order of superintending control	.30
03/13/25	JJG	Correspondence to Township Clerk Widmaier regarding filing of brief in opposition to request for order for superintending control	.40
03/13/25	JJG	Draft final revisions to brief in opposition to request for order of superintending control	.90
03/13/25	ZBOWM	Traveled from the Detroit office to Livingston County Circuit Court and back to personally submit physical copies of our Answer to Plaintiff's Complaint to both the judge and the court, ensuring proper filing and compliance with court procedures.	2.40
03/14/25	JJG	Review and analysis of Board meeting footage from Trustee Dollman-Jersey	.40
03/17/25	JJG	Correspondence x 4 from / to WHMI radio regarding request for a sound bite	.30
03/17/25	JJG	Prepare for oral argument on plaintiff's motion for entry of order for superintending control	1.80
03/18/25	JJG	Interview with Hannah Young of the Tri County Times	.10
03/18/25	JJG	Interview with WHMI radio	.20
03/18/25	JJG	Telephone call from / to Township Clerk regarding conversations overheard	.20
03/18/25	JJG	Correspondence to Township Attorney regarding attendance in court and expected outcome of hearing	.30
03/18/25	JJG	Conference with client representative and final review of notes in advance of oral argument on plaintiff's motion for order of superintending control	.50
03/18/25	JJG	Post oral argument conference with client representative regarding what is meant by the court taking the matter under advisement	.50
03/18/25	JJG	Appear for oral argument on plaintiff's motion for order of superintending control 830 - 925--delay in start time	.90
03/18/25	JJG	Return travel from Livingston County Circuit Court for oral argument on plaintiff's motion for order of superintending control	.90
03/18/25	JJG	Travel to Livingston County Circuit Court for oral argument on plaintiff's motion for order of superintending control	.90
03/19/25	JJG	Correspondence from / to Reporter Hannah Young of Tri-County Times regarding issuance of favorable Opinion.	.20

03/19/25	JJG	Radio interview with WHMI regarding favorable Opinion	.20
03/19/25	JJG	Correspondence x 4 from / to Township Clerk regarding protocol going forward	.40
03/19/25	JJG	Review and analysis of favorable opinion from Livingston County Circuit Court	.40
03/20/25	JJG	Correspondence from / to Township Clerk regarding protocol going forward	.20
03/20/25	JJG	Correspondence from / to Hannah Wilson of the Tri-County Times regarding interview	.30
03/25/25	JJG	Telephone call from / to Township Attorney Widmaier regarding requested attendance at April 15, 2025 Board meeting	.20
03/25/25	JJG	Correspondence to counsel for Plaintiff Chris Ropeta regarding requested attendance at April 15, 2025 Board meeting	.20
03/27/25	JJG	Correspondence to / from counsel for Mr. Ropeta regarding availability for attendance at public hearing	.20
03/27/25	ZBOWM	Review and analysis of file documentation on diary date, including all correspondences, client documents, and discovery, for purpose of identifying case needs and development of case strategy going forward.	.30
03/28/25	JJG	Correspondence from Township Attorney regarding authorized charges for public hearing	.10
03/28/25	JJG	Correspondence to counsel for Mr. Ropeta regarding authorized charges and date for public hearing	.20
03/31/25	JJG	Correspondence from counsel for Mr. Ropeta confirming authorized charges and date for public hearing	.10
Total Hours			<u>48.10</u>
Total Value of Services			<u>\$16,447.50</u>

Time Summary by Timekeeper	Hours	Amount
Benjamin Tigay	29.80	10,430.00
Daniel S. Saylor	1.20	420.00
John J. Gillooly	14.00	4,900.00
Zachary Bowman	3.10	697.50

Costs Advanced:

Date	Description	Amount
03/13/25	Fee to Zachary Bowman for Mileage Charge - 12.2 miles from 204 S Highlander Way, Howell, MI 48843, USA to 224 N 1st St, Brighton, MI 48116, USA	8.54
03/13/25	Fee to Zachary Bowman for Mileage Charge - 45.8 miles from 224 N 1st St, Brighton, MI 48116, USA to 1155 Brewery Park Blvd, Detroit, MI 48207, USA	32.06
03/13/25	Fee to Zachary Bowman for Mileage Charge - 56.9 miles from 1155 Brewery Park Blvd, Detroit, MI 48207, USA to 204 S Highlander Way, Howell, MI 48843, USA	39.83
03/18/25	Fee to John J. Gillooly for Mileage Charge - 113.8 miles from 1155 Brewery Park Blvd, Detroit, MI 48207, USA to 204 S Highlander Way, Howell, MI 48843, USA - Return Trip	79.66
Total Costs Advanced		<u>\$ 160.09</u>
Total Due This Invoice		\$16,607.59

Invoices for legal services are due upon receipt. To ensure proper application of your payment, please indicate our invoice number and client/matter number on your remittance.