




November 17, 2014

MEMORANDUM

TO: District Board of Trustees
FROM: Jim Murdaugh, President 
SUBJECT: Attorney Invoice - Andrews, Crabtree, Knox & Andrews, LLP October 27, 2014

Item Description

Request for approval to pay the Board's attorney.

Overview and Background

On a monthly basis, the Board's attorney submits an invoice for services provided.

Past Actions by the Board

The Board of Trustees approved the contract at the October 18, 2010 Board meeting and shall be effective through October 31, 2011. The contract may be renewed on an annual basis with four (4) consecutive one (1) year renewals for a total contract period of five (5) years. The Board approved year five (5) of the contract at the October 20, 2014 Board meeting which shall be effective until October 2015. The Board shall be billed on an annual flat fee of \$175,000 for services of the firm as approved by the Board at the October 21, 2013 Board meeting.

Funding/Financial Implications

Funding is budgeted in Fund 1, the Current Unrestricted Fund. The current amount due is \$14,583.33.

Staff Resource

Teresa Smith

Recommended Action

Authorize payment of invoice as presented.

ANDREWS, CRABTREE, KNOX & ANDREWS, LLP

1558 VILLAGE SQUARE BLVD.

SUITE 1

TALLAHASSEE, FL 32309

TAX ID #59-3621660

October 30, 2014

Teresa Smith
Vice President for Administrative Services and
Chief Financial Officer
Tallahassee Community College
444 Appleyard Drive
Tallahassee, FL 32304

Invoice# 12545 WRM
Our file# T00007 02276
Billing through 10/27/2014

Tallahassee Community College (General)
P.O. Number: 2015 00000778

FOR PROFESSIONAL SERVICES RENDERED

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| 09/26/2014 | BAA | Telephone conference with H. Parro at EEOC re extension request (.2); Receipt, review and analysis of correspondence from D. Wildes re Tax Ease contract for property (.1); Receipt, review and analysis of correspondence from R. Frazier re J. Young letter as to OSHA course completion (.2); | 0.50 hrs. |
| 09/26/2014 | JCK | Receipt and review of emails re public records request from H. Taylor (.1); Receipt and review of payments to North Florida Gulf Seafood (.1); Receipt and review of email from T. Smith re V. Wright lawsuit (.1); Receipt and review of email from B. Sloan re TCC, high school study abroad (.2); Receipt and review of TCC's Study Abroad documents (1.2); Receipt and review of legal memo from M. Kelly re minors studying abroad and duty of supervision (.8); Telephone conference with B. Sloan re TCC Study Abroad program (.3); | 2.80 hrs. |
| 09/26/2014 | JCK | Receipt and review of email from J. Niemczyk re acknowledgment of claim and preparation of coverage position re J. Steele case (.1); | 0.10 hrs. |
| 09/26/2014 | BJL | Review and analysis of Request for Production | 2.40 hrs. |

and contract for telecommunications contract with TCC (2.2); Preparation of correspondence to Bobby Hinson re Request for Production and contract for telecommunications contract with CenturyLink (.2);

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| 09/26/2014 | MK | Finished analyzing case law discussing the duty to supervise high school students in dual enrollment programs overseas (1.1); Analyzed case law regarding requirements for chaperones and their liability in case TCC wants to hire additional supervision for the study abroad program this summer (.8); Analyzed law on whether or not the high school student enrolled in study abroad program must pay expenses for the trip (1.4); | 3.30 hrs. |
| 09/29/2014 | BAA | Telephone conference with H. Parro at EEOC re extension to respond (x2) re S. Young complaint (.4); Preparation of correspondence to H. Parro re extension to respond re S. Young complaint (.2); Receipt, review and analysis of correspondence from L. Hope to D. Wildes re EDA Certificate of Engineer with plans (.4); Receipt, review and analysis of correspondence from C. Bush to FCSRMC re V. Wright lawsuit (.1); | 1.10 hrs. |
| 09/29/2014 | BAA | Conference with WRM re new lawsuit, EEOC complaint investigation and response (.4); Review and analysis of case law re splitting causes of action and required EEOC claims (.5); | 0.90 hrs. |
| 09/29/2014 | JCK | Conference with B. Mabile re pending issues, all resolved issues during his medical absence with college; and update on litigated college cases (.9); | 0.90 hrs. |
| 09/29/2014 | BJL | Telephone call from Jason Fowler re Request for Production and CenturyLink contract (.3); | 0.30 hrs. |
| 09/30/2014 | BAA | Preparation of correspondence to D. Wildes re contract for property purchase with Tax Ease (.2); Preparation of correspondence to R. | 1.70 hrs. |

Frazier re J. Young correspondence as to course completion (.2); Preparation of correspondence to S. Search re MOU document review (x2) (.3); Receipt, review and analysis of correspondence from H. Parro of EEOC re response to S. Young complaint (.1); Receipt, review and analysis of correspondence from R. Frazier re J. Young course completion (.1); Preparation of correspondence to H. Parro re extension request (.2); Preparation of correspondence to R. Tolson re records needed for S. Young response (.2); Receipt, review and analysis of correspondence from R. Frazier re new letter from J. Young (.3); Receipt, review and analysis of correspondence from H. Parro re extension request (.1);

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| 09/30/2014 | BJL | Review and analysis of initial Request for Production, compare with CenturyLink Contract (.6); Preparation of correspondence to Jason Fowler re comparison of initial Request for Production and CenturyLink contract (.1); | 0.70 hrs. |
| 09/30/2014 | WRM | Conference with R. Tolson re personnel issues (.5); Conference with T. Smith/R. Tolson re lawsuits, complaints, employee matters (2.0); | 2.50 hrs. |
| 09/30/2014 | MK | Reviewed pleadings and case file in preparation for answering Plaintiff's Complaint re V. Wright matter; | 0.60 hrs. |
| 10/01/2014 | BAA | Review file material compiled by Dr. Barrett on S. Young matter (.5); Emails to and from R. Tolson re: documents for S. Young's response and interviews (.2); Review and analysis of file material from S. Search re: proposed memo of understanding with GCSB and TCC for operation of child care facilities under grant, correspondence re: history of memorandum of understanding and needed language and review of proposed memorandum of understanding (.8); Telephone conferences (x2) with S. Search re: memorandum of | 2.60 hrs. |

understanding language, problems to address and issues unresolved (.5); Dictation and preparation of correspondence to S. Search re: problems with proposed memorandum of understanding and suggested changes (.4); Receipt, review and analysis of correspondence from S. Search re: revised memorandum of understanding (.1); Preparation of correspondence to S. Search re: additional revisions to memorandum of understanding (.1);

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| 10/01/2014 | BAA | Review and analysis of legal memorandum re: claims pursued under Title VII and whether all claims asserted with EEOC must be exhausted before suit (.5); Receipt, review and analysis of correspondence from I. Leonard re: OSHA classes and cards issued (.1); Preparation of correspondence to R. Tolson re: S. Young matter, documents needed and interviews (.2); | 0.80 hrs. |
| 10/01/2014 | WRM | Receipt and review of email from P. Locascio re domain name (.1); Receipt and review of email from L. Hope re WEI/EDA (.1); Receipt and review of email from A. Gaughf re Fl. Panthers agreement (.1); Receipt and review of email from D. Wildes re WEI/EDA (.1); Receipt and review of email from R. Hatfield re J. Steele presuit (.1); Receipt and review of email from T. Smith re DSO disclosure (.1); Receipt and review of email from B. Ingerman re online record requests (.1); Receipt and review of email from C. Summers re DOC Mutual Aid Agreement (.1); Receipt and review of email from R. Hatfield re Title IX (.1); Receipt and review of email from R. Frazier re former student (.1); Receipt and review of email from C. Summers re threat assessment (.1); | 1.10 hrs. |
| 10/02/2014 | BAA | Receipt, review and analysis of sponsorship agreement between TCC/FDOT and Florida Panthers, review as to legal issues (1.0); Review and analysis of sponsorship agreement | 6.40 hrs. |

between TCC/FDOT and Miami Dolphins, LTD, review as to legal issues (.8); Dictation and preparation of correspondence to A. Gaughf re: review of sponsorship contracts, legal issues raised, revisions and modifications needed (.7); E-mails to and from R. Tolson re: documents and response for S. Young claim (.3); Receipt, review and analysis of correspondence from D. Wildes re: EDA certificate (.1);

TCC - S. Young / Review and analysis of file material compiled by K. Barrett re: S. Young complaint (.7); Attend meeting with R. Tolson re: documents needed and information obtained (1.3); Attend interview with K. Barrett re: documents compiled and overview of claim (1.5);

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| 10/02/2014 | WRM | Receipt and review of e-mail from C. Dominguez re: litigation holds (.1); Receipt and review of e-mail from L. Golden re: litigation hold (.1); Telephone conferences (x2) with D. Wildes re: construction manager contract (.2); Review and analysis of construction manager contract (.5); E-mail to D. Wildes re: construction manager contract (.1); Review and analysis of Digital Marketing Agreement (.5); E-mail to T. Smith re: Digital Marketing Agreement (.1); | 1.60 hrs. |
| 10/03/2014 | BAA | Review and analysis of grievance filed by E. Stephens, memos as to reclassification and pay grade study, research as to market for pay range and classifications, and correspondence as to grievance filed and support (2.8); Dictation and preparation of investigation report to T. Smith and conclusions as to grievance claim filed by E. Stephens (2.5); | 5.30 hrs. |
| 10/03/2014 | BAA | Telephone conference with T. Smith of EEOC re response to V. Wright charge (x2); | 0.40 hrs. |
| 10/03/2014 | BAA | Dictation and preparation of correspondence to | 0.30 hrs. |

T. Smith re request for additional time for response to claim;

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| 10/06/2014 | BAA | Receipt, review and analysis of Sponsorship Agreement between Tampa Bay Arena and TCC/FDOT re indemnity, termination, damages, venue, arbitration (1.4); Dictation and preparation of correspondence to A. Gaughf re required revisions to contract between Tampa Bay and TCC/FDOT, recommended changes (1.2); Receipt, review and analysis of Sponsorship Agreement between Orlando Magic and TCC/FDOT re indemnity, termination, venue, damages, immunity, remedies, breach (1.6); Dictation and preparation of correspondence to A. Gaughf re recommended revisions and clarifications of Magic/TCC sponsorship agreement as to damages, termination, breach, and other recommended changes (1.0); | 5.20 hrs. |
| 10/06/2014 | BAA | Telephone conference with Tr. Smith re extension to respond to EEOC; | 0.20 hrs. |
| 10/06/2014 | JCK | Steele v TCC/ Receipt, review and analysis of legal memorandum from law clerk re Fair Credit Reporting Act (.4); | 0.40 hrs. |
| 10/06/2014 | JCK | Receipt, review and analysis of email from A. Moran re question re public records request (.1); Review case law under Chapter 119 (.6); Preparation of email to A. Moran re no basis to withhold information (.3); | 1.00 hrs. |
| 10/06/2014 | WRM | Receipt and review of emails (3) from D. Wildes re EDA certificate (.3); Receipt and review of email from T. Smith re employee grievance (.1); Receipt and review of email from L. Hope re EDA certificate (.1); Receipt and review of email from S. Gardner re litigation hold (.1); Receipt and review of email from B. Ingerman re public record process (.1); Receipt and review of email from K. Fernandes re litigation hold (.1); Receipt | 1.90 hrs. |

and review of emails (2) from D. Wildes re Wakulla EDA property descriptions (.2); Review and analysis of WTXL lease (.5); email to T. Smith/D. Wildes re WTXL lease (.1); Dictation and preparation of Litigation Report (.3);

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| 10/06/2014 | MK | Analyzed whether a public records exemption applies to marital status, job description, copies of incident reports, and other information requested by a party (1.8); | 1.80 hrs. |
| 10/07/2014 | BAA | Receipt, review and analysis of proposed lease agreement from D. Wildes between TCC & WAVE (.3); Preparation of correspondence to D. Wildes re review of lease TCC/WAVE (.2); Receipt, review and analysis of revised agreement between TCC/FDOT and Miami Dolphins, additional changes recommended (.4); Preparation of correspondence to A. Gaughf re Miami Dolphins contract review (.2); | 1.10 hrs. |
| 10/07/2014 | BAA | Receipt, review and analysis of correspondence from T. Smith re response to E. Stephens grievance claim (.1); Receipt and review of proposed grievance letter from T. Smith to E. Stephens (.1); | 0.20 hrs. |
| 10/07/2014 | JCK | Receipt, review and analysis of email from A. Moran re public records question (.1); | 0.10 hrs. |
| 10/07/2014 | WRM | Receipt and review of emails (2) from T. Smith re employee information, with attachments (.3); Revise litigation report (.1); Receipt and review of email from L. Golden re litigation hold with attachment (.2); Receipt and review of email from D. Wildes re WTXL lease (.1); Receipt and review of email from J. Murdaugh re employee grievance, with attachments (.2); Receipt and review of email from M. Miller re litigation hold (.1); Receipt and review of emails (2) from B. Sloan re faculty trip funding (.2); Receipt and review of | 4.60 hrs. |

emails (2) from A. Moran re public record request with email trail (.3); Receipt and review of email from B. Lienback re litigation hold (.1); Receipt and review of emails (3) from R. Tolson re employee grievance response (.3); Receipt and review of emails (5) from T. Smith re employee grievance response (.5); Receipt and review of emails (2) from B. Hinson re modified vendor application with attachment (.3); emails (2) to B. Hinson/T. Smith re modified vendor application (.2); emails (2) to T. Smith re litigation hold form (.2); emails (2) to T. Smith/R. Tolson re V. Wright EEOC charge (.2); Receipt and review of emails (2) from T. Smith re V. Wright EEOC charge (.2); Receipt and review of email from T. Smith re litigation hold form (.1); email to T. Smith re employee information (.1); Review and analysis of WEI/EDA engineer's revised certificate (.2); Review and analysis of EEOC charge, law, background information re V. Wright EEOC charge response (.7);

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| 10/08/2014 | JCK | Receipt, review and analysis of public records request from J. Long (.1); Preparation of answer to inquiry of J. Long's public records request (.4); Receipt, review and analysis of email from A. Maxwell re public records request from an employee (.1); Receipt, review and analysis of email from A. Moran re public records request from an employee (.1); Receipt, review and analysis of email from R. Tolson re employee public records requests (.2); Preparation of email to R. Tolson re potential policy re employee public records requests (.3); Receipt, review and analysis of email from R. Tolson re employee public records requests (.1); | 1.30 hrs. |
| 10/08/2014 | WRM | Receipt and review of emails (2) from T. Smith re V. Wright EEOC charge (.2); Receipt and review of emails (2) from T. Smith re employee grievance (.2); email to T. Smith re | 5.40 hrs. |

employee grievance (.1); Receipt and review of email from C. Dominguez re facility use (.1); Receipt and review of emails (2) from B. Hinson re vendor form (.2); email to B. Hinson re vendor form (.1); email to T. Smith re V. Wright EEOC charge (.1); Receipt and review of email from R. Tolson re employee grievance (.1); emails (3) to B. Ingerman re inquiry response (.3); Review and analysis of engineer's revised certificate, other documents re EDA certification - WEI (.5); emails (3) to D. Wildes re WEI/EDA certification (.3); Receipt and review of emails (2) from D. Wildes re WEI/EDA certification (.2); Dictation and preparation of correspondence to A. Williams re WEI/EDA certification (.3); Review and analysis of faculty travel questions (.7); emails (2) to B. Sloan re faculty travel (.2); Receipt and review of emails (2) from B. Ingerman re inquiry response (.2); Receipt and review of email from B. Sloan re faculty travel (.1); email to R. Tolson re employee grievances (.1); Telephone conference with R. Tolson re employee grievances (.2); Conference with R. Tolson/T. Smith re employee issues (1.2);

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| 10/09/2014 | JCK | Receipt, review and analysis of email from A. Moran re public records issue with employees (.1); Receipt, review and analysis of email from R. Tolson re public records issue with employees (.1); Receipt, review and analysis of email from A. Moran re public records issue with employees (.1); Receipt, review and analysis of email from A. Maxwell re letter of intent (.1); Preparation of email to A. Maxwell re letter of intent (.1); Receipt, review and analysis of email from A. Maxwell re letter of intent (.1); Receipt, review and analysis of email from L. Kling re Notice of Intent (.1); | 0.70 hrs. |
| 10/09/2014 | WRM | Receipt and review of emails (3) from A. Moran re employee record request (.3); Receipt and review of email from T. Smith re | 3.30 hrs. |

V. Wright EEOC charge (.1); Receipt and review of emails (3) from R. Tolson re employee record request (.3); email to R. Tolson re employee record request (.1); Telephone conference with R. Tolson re employee public record request (.1); Review and analysis of background information re V. Wright EEOC charge (2.4);

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| 10/10/2014 | BAA | Receipt, review and analysis of Notice of Intent to Sue served by J. Floyd re Environmental Institute (.3); Review file material re aquaculture program, funding loan issues and correspondence (.4); Conference with B. Mabile re coordinating response and investigation (.5); | 1.20 hrs. |
| 10/10/2014 | WRM | Telephone conference (2) with T. Smith re WEI student (.4); Review documents re WEI student (.3); Telephone conference with R. Tolson re employee issue (.3); Receipt and review of emails (2) from C. Stringer re dual enrollment students field trips (.2); Receipt and review of email from T. Smith re vendor form (.1); Receipt and review of email from B. Hinson re vendor form (.1); Receipt and review of emails (2) from T. Smith re WEI student (.2); email to C. Stringer re dual enrollment student (.1); | 1.70 hrs. |
| 10/13/2014 | BAA | Review and analysis of large notebook compiled by K. Barrett as to history of work performance by S. Young, issues in job duties, performance, non-compliance and probation; | 2.00 hrs. |
| 10/13/2014 | WRM | Receipt and review of email from T. Smith re litigation hold (.1); email to T. Smith re litigation hold (.1); Receipt and review of emails (3) from T. Smith re WEI student (.3); Receipt and review of email from R. Tolson re V. Wright EEOC charge (.1); Receipt and review of email from R. Tolson re revision to Policy 03-01 (.1); Receipt and review of email from C. Stringer re dual enrollment students | 3.70 hrs. |

(.1); Receipt and review of email from T. Smith re Gadsden TCC closing (.1); Receipt and review of email from R. Tolson re employee incident (.1); Receipt and review of email from A. Maxwell re WEI student (.1); Receipt and review of email from A. Gaughf re WEI student (.1); Telephone conference with R. Tolson re employee incident (.1); Review and analysis of documents re WEI student (.9); Conference with T. Smith, S. Cushman re WEI student (1.5);

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| 10/14/2014 | BAA | Continued review and analysis of comprehensive notebook and catalog of job performance by S. Young, including performance review, performance improvement plan, correspondence and related documents (1.8); Review and analysis of response of S. Young and grievance as to charge of discrimination (.9); Telephone conference with R. Tolson re response to EEOC (.4); Begin dictation and preparation of proposed Affidavit for use in response to EEOC request for information (1.0); | 4.10 hrs. |
| 10/14/2014 | BAA | S. Young v. TCC/ Review and analysis of EEOC request for information as to specific documents and items requested (.3); Dictation and preparation of first draft of response to EEOC charge of discrimination (.8); | 1.10 hrs. |
| 10/14/2014 | JCK | Conference with B. Mabile re TCC employment litigated cases (.8); | 0.80 hrs. |
| 10/14/2014 | WRM | Receipt and review of email from M. Mustian re FPSI refinancing (.1); Receipt and review of email from M. Healy re Title IX (.1); email to R. Tolson/C. Summers re Title IX (.1); Receipt and review of emails (2) from C. Summers re FDLE offender file (.2); email to C. Summers re FDLE offender file (.1); Review closing documents re FPSI refinancing (1.4); Review revisions to Policy 03-01, compare with Policy 06-16 (.5); Telephone conference (2) with R. | 3.90 hrs. |

Tolson re Policy 03-01 revision, employee grievance (.4); Telephone conference (2) with R. Tolson re domestic violence policy (.2); Receipt and review of email from R. Tolson re domestic violence (.1); Review and analysis of proposed domestic violence policy (.5); Telephone conference (2) with T. Smith re FPSI refinancing (.2);

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| 10/15/2014 | BAA | S. Young v. TCC/ Review, revise and finalize draft Affidavit of K. Barrett in response to claim (.7); Review, revise and finalize Respondent's Statement of Response to EEOC claim (.8); Review and analysis of disciplinary file of S. Young as to materials to produce, any redactions or withdrawals (.7); Review and analysis of employee personnel file as to compliance with request of EEOC, any material to withhold or redact (.8); Review and analysis of time and performance file of S. Young re documents requested by EEOC, what to redact or withhold (.8); Review and analysis of TCC employment policies re grievance, equal opportunity, harassment and discipline (.5); Preparation of correspondence to K. Barrett re draft affidavit (x3); Preparation of correspondence to R. Tolson re draft affidavit and Response to EEOC (x2) (.3); Telephone conference with K. Barrett re draft affidavit, material to review (x2) (.3); Telephone conference with R. Tolson re draft Response of TCC to EEOC claim, documents to produce (.4); Dictation and preparation of correspondence to H. Parra of EEOC re documents responsive to request, identification and clarification of requested material (.8); Telephone conference with H. Parra re time to respond (.2); email to H. Parra re additional time to respond (.2); | 6.90 hrs. |
| 10/15/2014 | JH | S. Young v. TCC/ Review 613 pages of records for redaction of Complainant's personal identification information for response to EEOC's request for documents; | 3.00 hrs. |

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| 10/15/2014 | WRM | Receipt and review of email from B. Sloan re employee incident (.1); Telephone conference with S. Conner re record request, employee incident (.2); email to B. Sloan re employee incident (.1); email to E. Eunice re FPSI dorm refinancing (.1); Review Agenda for Board Meeting 10-20-14 (.5); Telephone conference with R. Tolson re employee incident (.1); Receipt and review of email from S. Schroeder re Sunshine Law (.1); Continued review of documents re V. Wright EEOC charge (2.2); | 3.40 hrs. |
| 10/15/2014 | MK | Steele v. TCC/ Analyzed case law relating to general liability of TCC under FCRA 1681b(b) (1.2); Analyzed 250 documents relating to Plaintiff in making a timeline/report on when certain events occurred and what documents were produced by Plaintiff in her employment (1.6); | 2.80 hrs. |
| 10/16/2014 | BAA | S. Young v. TCC/ Telephone conference with K. Barrett re draft affidavit, issues as to reclassification of position, staffing changes (.9); Revise draft affidavit of K. Barrett (x2) (.5); Revise draft Response of TCC to EEOC claim (x2) (.5); emails to and from R. Tolson re revisions to Affidavit and Response (x2) (.2); emails to and from K. Barrett re revisions to draft affidavit (x3) (.3); Telephone conference with R. Tolson re revisions to Affidavit and response, issues to add (x2) (.6); | 3.00 hrs. |
| 10/16/2014 | WRM | Telephone conference (2) with R. Tolson re employee incident, V. Wright EEOC charge (.5); Receipt and review of emails (2) from S. Search re dual enrolled students (.2); Receipt and review of email from B. Sloan re employee incident (.1); Receipt and review of emails (7) from E. Eunice re FPSI dorm refinancing (.7); emails (2) to E. Eunice re FPSI dorm refinancing (.2); Telephone conference (2) with S. Search re dual enrolled students (.2); Review dual enrollment statutes | 4.80 hrs. |

(.4); Review all TCC policies re employee incident (.9); Review FPSI dorm refinancing documents (.6); Telephone conference with R. Tolson re employee incident (.4); Continued review of file documents re V. Wright EEOC charge (.5); email to R. Tolson re V. Wright EEOC charge (.1);

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| 10/16/2014 | MK | Steele v. TCC/ Analyzed case law relating to general liability of TCC under FCRA 1681a(b) (1.4); Communicated with R. Tolson about Plaintiff's personal appeal in another employment matter and also about obtaining additional documents that are in TCC's possession (.4); Finished analyzing 165 additional documents in making a timeline/report on when certain events occurred and what documents were produced by Plaintiff in her employment (1.8); Analyzed Plaintiff's attorney claim and defenses to claim relating to why Plaintiff was terminated (1.1); Analyzed case law related to TCC's requirements for compliance with FCRA (1.2); | 5.90 hrs. |
| 10/17/2014 | BAA | S. Young v. TCC/ Revise document production to EEOC per request (.3); Revise correspondence to H. Parro re response to EEOC claim (.5); Compile documents for production to EEOC (.4); | 1.20 hrs. |
| 10/17/2014 | JCK | Receipt, review and analysis of email from R. Tolson re Ms. Steele's unemployment approval (.1); Receipt, review and analysis of Notice of Appeal (.1); Receipt, review and analysis of Order of Reemployment Assistance Appeal (.4); Review Florida's Reemployment Assistance law re appeals (.7) Preparation of email to R. Tolson re outcome of appeal (.2); | 1.50 hrs. |
| 10/17/2014 | MK | Steele v. TCC/ Communicated via email with R. Tolson about when the specific dates were when adverse employment decisions occurred with Ms. Steele (.4); Analyzed case law on investigative consumer reports and their | 3.20 hrs. |

differences with a regular consumer report (.8); Analyzed whether a driving history background request falls under the definition for a consumer report (.7); Analyzed what occurs if an adverse employment decision occurs to a Plaintiff before Plaintiff receives a copy of the consumer report (1.3);

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| 10/20/2014 | WRM | Telephone conference with T. Smith re FPSI dorm refinancing (.2); Receipt and review of emails (4) from E. Eunice re FPSI dorm refinancing (.4); emails (2) to E. Eunice re FPSI dorm refinancing (.2); Receipt and review of email from T. Smith re WEI record demand (.1); Receipt and review of email from R. Frazier re former student (.1); Receipt, review and analysis of correspondence from J. Young re former student issues (.1); email to R. Frazier re former student (.1); Receipt and review of emails (2) from B. Ingerman re FDLE search warrant (.2); Receipt and review of email from T. Smith re FDLE search warrant (.1); email to B. Ingerman/T. Smith re FDLE search warrant (.1); Receipt and review of email from B. Babb re business associate agreements (.1); Receipt and review of email from S. Schroeder re business associate agreements (.1); Receipt and review of email from C. Dominguez re business associate agreements (.1); Receipt and review of emails (2) from T. Smith re domestic violence policy (.2); emails (2) to T. Smith, C. Summers re domestic violence policy (.2); Receipt and review of email from T. Smith re FPSI dorm refinancing (.1); Receipt and review of email from B. Mullaney re business associate agreements (.1); Receipt and review of email from M. Koehler re business associate agreements (.1); Analysis: authority for FPSI dorm refinancing (.4); Review and analysis of documents re Century Link agreement (.5); Telephone conference (2) with J. Fowler re Century Link agreement (2); Receipt and | 7.80 hrs. |
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review of email from T. Gilliam re business associate agreements (.1); email to R. Tolson re J. Steele allegation (.1); Telephone conference with M. Mustian re FPSI dorm refinancing (.1); Review TCC policy re equal opportunity and grievances - applicable to staff/faculty (.3); Receipt and review of email from C. Dominguez re firearms on campus (.1); email to C. Summers re firearms on campus (.1); Receipt and review of email from T. Smith re UDT proposal (.1); email to J. Fowler re Century Link agreement (.1); Attend Board Business Meeting and workshop (1.9); Conference with R. Tolson/B. Sloan re employee incident (.5); Conference with R. Tolson re employee issues (.7);

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| 10/20/2014 | MK | Steele v. TCC/ Analyzed email answers from R. Tolson in response to questions I had corresponded with her about (.8); Analyzed case law relating to damages that a Plaintiff can claim under a violation of the FCRA statutes (1.6); | 2.40 hrs. |
| 10/21/2014 | WRM | Receipt and review of email from D. Wildes re Capitol Center leases (.1); Receipt and review of emails (2) from R. Frazier re former student (.2); Receipt and review of emails (4) from J. Fowler re Century Link agreement (.4); Receipt and review of emails (2) from Ki. Moore re INIE bank account (.2); Receipt and review of email from D. Wildes re new Gadsden property (.1); Receipt and review of email from S. Prouty re subpoena for employee evaluations (.1); Receipt and review of email from B. Babb re subpoena for employee evaluations (.1); Receipt and review of email from L. Golden re subpoena for employee evaluations (.1); Receipt and review of email from C. Summers re firearms on campus (.1); Receipt and review of email from C. Summers re domestic violence policy (.1); Receipt and review of email from M. Healy re Violence Against Women Law (.1); Telephone | 5.60 hrs. |

conference with M. Mustian re FPSI dorm refinancing (.2); Receipt, review and analysis of correspondence from J. Young re former student complaint (.1); email to R. Frazier re former student complaint (.1); Receipt and review of email from P. Locascio re subpoena for employee evaluations (.1); Receipt and review of email from C. Summers re Violence Against Women law (.1); Receipt and review of email from M. Koehler re subpoena for employee evaluations (.1); Receipt and review of email from C. Dominguez re subpoena for employee evaluations (.1); Receipt and review of email from S. Schroeder re subpoena for employee evaluations (.1); email to D. Wildes re Capitol Center lease (.1); email to E. Eunice/T. Smith re FPSI dorm refinancing (.1); Review and analysis of INIE online bank agreement (.6); email to Ki. Moore re INIE online bank agreement (.1); email to D. Wildes re new Gadsden property (.1); Telephone conference with D. Wildes re new Gadsden property, Capitol Center liens (.2); Review and analysis of Century Link agreement - indemnity provisions (.4); email to J. Fowler re Century Link indemnity provision (.1); Review termination provision in Century Link agreement (.3); email to J. Fowler on Century Link termination provision (.1); Review and analysis of UDT agreement (.4); email to T. Smith/B. Ingerman re UDT agreement (.1); Receipt and review of emails (2) from S. Conner re domestic violence policy (.2); Telephone conference (2) with S. Conner re domestic violence policy (.2); Telephone conference with T. Smith re FPSI dorm refinancing (.1);

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| 10/22/2014 | WRM | Receipt and review of email from B. Ingerman re UDT proposal (.1); email to B. Ingerman re UDT proposal (.1); Receipt and review of email from J. Fowler re Century Link agreement (.1); email to J. Fowler re Century | 4.60 hrs. |
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Link agreement (.1); Receipt and review of email from R. Marquez re establishment of DSO (.1); Receipt and review of emails (3) from T. Smith re FPSI dorm refinancing (.3); Receipt and review of emails (2) from B. Babb re JAPC agency review, 120.74 (.2); Receipt and review of emails (2) from M. Mustian re FPSI dorm refinancing (.2); Telephone conference with J. Fowler re Century Link agreement (.1); Receipt and review of email from B. Mullowney re JAPC agency review, 120.74 (.1); email to M. Mustian re FPSI dorm refinancing (.1); Receipt and review of FPSI dorm refinancing documents from M. Mustian (.4); Review draft borrower's counsel's opinion, Secretary of State site for FPSI dorm refinancing (.4); Telephone conference with E. Eunice re FPSI dorm refinancing (.1); Review Florida Secretary of State records re PSAH (.4); email to E. Eunice re FPSI dorm refinancing, Secretary of State records (.1); Telephone conference with B. Nylen re FPSI dorm refinancing - insurance consultant (.1); emails (3) to T. Smith re FPSI dorm refinancing - insurance consultant (.3); email to J. Chaires-Lacey re V. Wright EEOC charge response (.1); Receipt and review of email from J. Chaires-Lacey re V. Wright EEOC charge response (.1); Receipt and review of email from T. Gilliam re JAPC agency review, 120.74 (.1); Telephone conference with E. Eunice re FPSI dorm refinancing (.1); Begin preparation of response to V. Wright's EEOC charge (.7); email to M. Hansard re FPSI dorm refinancing (.1); Telephone conference with T. Smith re FPSI dorm refinancing (.1);

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| 10/23/2014 | JCK | Receipt, review and analysis of email from E. Jones re public records request (.1); Receipt, review and analysis of Request to Produce to TCC in workers' compensation case (.2); Preparation of email to E. Jones re public records request (.2); | 0.50 hrs. |
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| 10/23/2014 | WRM | Receipt and review of email from B. Ingerman re Century Link agreement (.1); Telephone conference with B. Ingerman re Century Link agreement (.2); Receipt and review of email from H. Wright re response to V. Wright EEOC charge (.1); Receipt and review of email from J. Chaires-Lacey re reference request re former employee, with attachment (.2); email to J. Chaires-Lacey re reference request re former employee (.1); email to H. Wright re documents for response to V. Wright EEOC charge (.1); Receipt and review of email from J. Chaires-Lacey re employee grievance (.1); email to J. Chaires-Lacey re employee grievance (.1); Receipt and review of emails (2) from E. Eunice re PSAH refinancing (.2); Receipt and review of emails (2) from M. Hansard re PSAH refinancing (.2); emails (2) to T. Smith re PSAH refinancing (.2); Receipt and review of emails (3) from D. Wildes re new Gadsden property (.3); Receipt and review of emails (2) from T. Smith re student debt (.2); email to T. Smith re student debt (.1); Receipt and review of email from R. Frazier re former student complaint with attachment (.2); email to R. Frazier re former student complaint (.1); Telephone conference with R. Hatfield re PSAH refinancing (.1); email to T. Smith/E. Eunice re PSAH refinancing (.1); Receipt and review of email from T. Smith re PSAH refinancing (.1); email to J. Chaires-Lacey re V. Wright EEOC charge response (.1); Continued preparation of response to V. Wright EEOC charge (2.0); Telephone conference with T. Smith re PSAH refinancing (.1); | 5.00 hrs. |
| 10/24/2014 | JCK | Receipt, review and analysis of email from K. Williams re public records request in workers' compensation claim (.1); Receipt, review and analysis of email from K. Williams re public records request for emails between TCC employees (.1); Receipt, review and analysis | 1.70 hrs. |

of email from V. Wright re vendor dues in public records request (.1); Receipt, review and analysis of email from S. Conner re vendor dues in public records request (.1); Receipt, review and analysis of memo from law clerk re Fair Credit Reporting Act to state cause of action (1.3);

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| 10/27/2014 | JCK | Receipt, review and analysis of email from E. Jones re public records request (.1); | 0.10 hrs. |
| 10/27/2014 | WRM | Receipt and review of email from T. Smith re PSAH refinancing (.1); Receipt and review of emails (2) from K. Fernandes re contract management (.2); Receipt and review of email from S. Schroeder re contract management (.1); Receipt and review of email from G. Haile re contract management (.1); Receipt and review of email from M. Koehler re contract management (.1); Receipt and review of email from B. Mullooney re contract management (.1); Receipt and review of emails (2) from C. Summers re WEI incident (.3); Receipt and review of email from K. Williams re E/C production request (.1); Receipt and review of email from P. Manning re student debt (.1); Receipt and review of email to T. Smith/P. Manning re student debt (.1); Receipt and review of email from J. Chaires-Lacey re grievance appeal (.1); email to J. Chaires-Lacey/L. Kling re grievance appeal (.1); Receipt and review of email from G. Haile re charity raffles (.1); Receipt and review of email from S. Prouty re charity raffles (.1); Receipt and review of email from T. Gilliam re charity raffles (.1); Receipt and review of email from B. Sloan re adjunct faculty training (.1); Receipt and review of email from A. Gaughf re Orlando Magic contract (.1); Receipt and review of email from D. Wildes re new Gadsden property (.1); Receipt and review of email from B. Ingerman re Sunshine law (.1); email to B. Ingerman re Sunshine Law (.1); email to D. Wildes re new | 6.80 hrs. |

Gadsden property (.1); email to A. Gaughf re Orlando Magic contract (.1); email to B. Sloan re adjunct faculty training (.1); email to C. Summers re WEI incident (.1); email to T. Smith re PSAH refinancing (.1); Telephone conference with T. Smith re employee fingerprinting, student debt, Gadsden property (.3); Continued dictation and preparation of response to V. Wright EEOC charge (2.8); Receipt and review of email from T. Smith re employee fingerprinting (.1); email to T. Smith re WEI incident (.1); Receipt and review of email from T. Smith re PSAH refinancing (.1); Telephone conference with D. Wildes re new Gadsden property (.1); Telephone conference with T. Smith re WEI incident, employee grievance (.2); email to E. Eunice/T. Smith re PSAH refinance (.1); Telephone conference (2) with C. Summers re WEI incident (.2);

10/27/2014 Monthly Fee; 14,583.33

Fees for this matter \$14,583.33

BILLING SUMMARY

Andrews, Ben A. Partner 46.20 hrs

Knox, J. Craig Partner 11.90 hrs

Longfellow, B. Joe Associate 3.40 hrs

Mabile, William R Attorney 67.70 hrs

Hunter, Jessica Paralegal 3.00 hrs

Kelly, Michael Law Clerk 20.00 hrs

Fees 152.20 hrs

\$14,583.33

Disbursements

\$0.00

TOTAL CHARGES FOR THIS BILL

\$14,583.33