

Yethunorid

*P.O. 2024 - 1801
Paying from Retainer
\$2500-*

**GAMMAGE
&
BURNHAM**
Attorneys at Law

City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney

40 NORTH CENTRAL AVENUE
20TH FLOOR
PHOENIX, ARIZONA 85004
TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

December 20, 2023

Invoice 318176

ID: MMV 12990-0001

RE: RLUIPA Lawsuit

For Services Rendered Through: November 30, 2023

Balance Forward	\$0.00
Current Fees	\$1,395.00
Total Current Charges	\$1,395.00
Less Trust Applied	-\$1,395.00
Total Due	\$0.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>

Gammage & Burnham

CLIENT: City of San Luis	Invoice Date 12/20/2023
RE: RLUIPA Lawsuit	Invoice Number 318176
ID MMV 12990-0001	Page 2

Fees					
Date	Atty	Description	Hours	Rate	Amount
11/28/2023	MMV	Emails with Cameron Artigue regarding response to City of San Luis	0.30	\$450	135.00
11/29/2023	CCA	Analysis of RLUIPA issues.	1.00	\$450	450.00
11/29/2023	MMV	Calls with Kay Macuil (City Attorney) and Mayor regarding RLUIPA; Conversations with Cameron Artigue regarding RLUIPA response;	0.50	\$450	225.00
11/30/2023	CCA	Review memo from Mr. Gimbut.	0.80	\$450	360.00
11/30/2023	CCA	Draft correspondence back to church.	0.50	\$450	225.00
Total Fees			3.10		1,395.00

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	2.30	450.00	1,035.00
MMV	Vaz, Manjula M.	0.80	450.00	360.00
Total Fees				\$1,395.00

Total Current Charges	\$1,395.00
Less trust applied	-\$1,395.00
Total Balance Due	\$0.00

Trust Account Summary		Payments	Deposits	Balance
Chase IOLTA Trust Account				
12/5/2023	Payment Received from: City of San Luis Check #: 107565 Retainer		2,500.00	\$2,500.00
12/20/2023	Client/Matter Code: 12990/0001 RLUIPA Lawsuit Trust applied to Bill #318176	1,395.00		\$1,105.00



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City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
jtaylor@sanluisaz.gov

January 9, 2024

Invoice 319795

ID: MMV 12990-0001
RE: RLUIPA Lawsuit

For Services Rendered Through: January 9, 2024

Balance Forward	\$0.00
Current Fees	\$3,780.00
Total Current Charges	\$3,780.00
Less Trust Applied	-\$1,105.00
Total Due	\$2,675.00

JAN - 9 2024

APPROVED
Kay Maion Macuil

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
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Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 01/09/2024

RE: RLUIPA Lawsuit

Invoice Number 319795

ID MMV 12990-0001

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Fees					
Date	Atty	Description	Hours	Rate	Amount
12/04/2023	CCA	Revise letter to Church regarding traffic and zoning infractions.	1.00	\$450	450.00
12/04/2023	CCA	Review comments from Mr. Gimbut.	0.30	\$450	135.00
12/04/2023	MMV	Review letter to City: Conversation with Cameron Artigue: email to City of San Luis	0.50	\$450	225.00
12/05/2023	MMV	Review City revisions; Conversation with CCA	0.30	\$450	135.00
12/06/2023	CCA	Call with City Attorney and Glenn Gimbut.	0.70	\$450	315.00
12/06/2023	CCA	Revise letter to Church based upon discussions with co-counsel.	0.50	\$450	225.00
12/06/2023	MMV	Review emails and letter revisions from Glenn Glimlet;	0.20	\$450	90.00
12/06/2023	MMV	Call with the City of San Luis	0.50	\$450	225.00
12/07/2023	CCA	Finalize letter to Gethsemani Church.	0.40	\$450	180.00
12/07/2023	MMV	Finalize letter; Email final letter to clients;	0.30	\$450	135.00
12/07/2023	MMV	Conversation with Cameron Artigue regarding final letter; Finalize letter;	0.30	\$450	135.00
12/13/2023	CCA	Review emails and research from Mr. Gimbut.	0.40	\$450	180.00
12/13/2023	CCA	Legal research regarding ripeness under RLUIPA.	1.00	\$450	450.00
12/15/2023	CCA	Additional legal research regarding scope of commercial activity that is protected under RLUIPA.	0.80	\$450	360.00
12/15/2023	CCA	Prepare email for client summarizing strategic points and use of CUP procedure against Gethsemani church.	0.90	\$450	405.00
12/15/2023	MMV	review emails from Glen Gimlet; Conversation with Cameron Artigue regarding RLUIPA issues and Council executive session;	0.30	\$450	135.00
Total Fees			8.40		3,780.00

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City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
jtaylor@sanluisaz.gov

February 15, 2024

ID: MMV 12990-0001

RE: RLUIPA Lawsuit

For Services Rendered Through: January 31, 2024

Previous Balance	\$2,675.00
Payments	\$0.00
Balance Forward	\$2,675.00

Total Due	\$2,675.00
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Prior Invoice Date	Invoice Number	Original Amount	Payments & Credits	Prior Invoice Balance
01/09/2024	319795	\$3,780.00	\$1,105.00	\$2,675.00
Total Outstanding Balance				\$2,675.00

Aged Accounts Receivable						
	0-30	31-60	61-90	91-120	120+	Total Due
Totals	\$0.00	\$2,675.00	\$0.00	\$0.00	\$0.00	\$2,675.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
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CLIENT: City of San Luis

Invoice Date 01/09/2024

RE: RLUIPA Lawsuit

Invoice Number 319795

ID MMV 12990-0001

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Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	6.00	450.00	2,700.00
MMV	Vaz, Manjula M.	2.40	450.00	1,080.00
Total Fees				\$3,780.00

Total Current Charges **\$3,780.00**

Less trust applied -\$1,105.00

Total Balance Due **\$2,675.00**

Trust Account Summary		Payments	Deposits	Balance
<u>Chase IOLTA Trust Account</u>				
12/20/2023	Balance as of 12/20/2023			\$2,500.00
12/22/2023	Client/Matter Code: 12990/0001 RLUIPA Lawsuit Trust applied to Bill #318176	1,395.00		\$1,105.00
1/23/2024	Client/Matter Code: 12990/0001 RLUIPA Lawsuit Trust applied to Bill #319795	1,105.00		\$0.00

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May 22, 2024

Invoice 323092

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: April 30, 2024

Balance Forward	\$0.00
Current Fees	\$21,207.50
Current Expenses	\$55.20
Discount	-\$2,201.84
Total Current Charges	\$19,060.86
Less Trust Applied	-\$19,060.86
Total Due	\$0.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
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4-2-2024

Gammage & Burnham

CLIENT: City of San Luis

RE: Gethsemani Baptist Church

ID MMV 12990-0002

Invoice Date 05/22/2024

Invoice Number 323092

Page 2

Fees					
Date	Atty	Description	Hours	Rate	Amount
03/19/2024	CCA	Review complaint and application for preliminary injunction	2.00	\$450	900.00
03/19/2024	CCA	Research regarding jurisdictional objections to RLUIPA complaint and related issues	1.80	\$450	810.00
03/19/2024	MMV	Review email and new complaint ; Conversaiton with Cameron Artigue regarding complaint; Call with Kay Macuil regarding new complaint;	0.50	\$450	225.00
03/20/2024	CCA	Review complaint and application for preliminary injunction	1.50	\$450	675.00
03/20/2024	CCA	Legal research regarding RLUIPA claims against individual defendants and city officials	0.60	\$450	270.00
03/20/2024	CCA	Outline possible defense strategies	0.80	\$450	360.00
03/20/2024	CCA	Emails with City Attorney regarding service of process and consultation	0.60	\$450	270.00
03/21/2024	CCA	Research regarding ripeness issues under RLUIPA and outline possible motion to dismiss	2.00	\$450	900.00
03/21/2024	CCA	Email to City attorney regarding municipal court action	0.30	\$450	135.00
03/21/2024	MMV	Meeting with Cameron Artigue regarding RLUIPA lawsuit	0.50	\$450	N/C
03/21/2024	MMV	Meeting with Cameron Artigue regarding complaint and response	0.50	\$450	N/C
03/22/2024	CCA	Call with City Attorney regarding service and response to complaint	1.00	\$450	450.00
03/22/2024	CCA	Outline issues for dismissal of individual defendants	0.80	\$450	360.00
03/22/2024	CCA	Legal research regarding ripeness of First amendment claims	0.50	\$450	225.00
03/22/2024	MMV	Call with City Attorney Kay Macuil and Cameron Artigue regarding case strategy and response	0.70	\$450	315.00
03/26/2024	MMV	Emails with Kay Macuil regarding church press opportunities	0.10	\$450	45.00
03/27/2024	MMV	Call with Kay Macuil regarding response to press;	0.20	\$450	90.00
04/02/2024	MMV	Call with Kay Macuil regarding scheduling conference	0.30	\$450	135.00
04/03/2024	CLH	Attend scheduling conference and phone call with K. Macuil	0.60	\$450	N/C

Gammage & Burnham

CLIENT: City of San Luis

RE: Gethsemani Baptist Church

ID MMV 12990-0002

Invoice Date 05/22/2024

Invoice Number 323092

Page 3

Fees

Date	Atty	Description	Hours	Rate	Amount
04/03/2024	EMR	Attend and take notes during status conference with opposing parties and Judge Snow.	0.40	\$325	130.00
04/03/2024	MMV	Emails with Cameron Artigue regarding response to scheduling conference: email to Kay Macuil regarding response for scheduling conference	0.50	\$450	225.00
04/03/2024	MMV	Review and respond to emails from Kay Macuil: Review public records request from Snell & Wilmer;	0.30	\$450	N/C
04/05/2024	CCA	Review emails regarding conference with Judge Snow and outline possible motion to dismiss for lack of jurisdiction	1.00	\$450	450.00
04/08/2024	MMV	Conversation with Cameron Artigue regarding schedule conference and executive session	0.30	\$450	135.00
04/09/2024	KB	Drafted templates for Answer to Complaint and Response to Motion for Preliminary Injunction	0.70	\$225	157.50
04/10/2024	CCA	Prepare for and attend executive session with City Council	2.00	\$450	900.00
04/10/2024	CCA	Prepare motion to dismiss complaint	2.00	\$450	900.00
04/10/2024	MMV	Attend executive session with San Luis City Council	1.00	\$450	450.00
04/12/2024	CCA	Start preparation of Motion to dismiss complaint for lack of jurisdiction	2.20	\$450	990.00
04/12/2024	EMR	Develop case strategy and necessary steps to take in moving forward with City's defense.	1.00	\$325	325.00
04/12/2024	MMV	Meeting with Cameron Artigue and Evan Russell regarding strategy	1.00	\$450	N/C
04/15/2024	CCA	Prepare motion to dismiss complaint	1.80	\$450	810.00
04/15/2024	CCA	Email to Snell regarding records and case management	0.20	\$450	90.00
04/15/2024	EMR	Review and analysis of Arizona case law interpreting FERA in preparation to draft motion to dismiss.	1.00	\$325	325.00
04/15/2024	MMV	Emails with Cameron Artigue regarding motion to dismiss; Email to Kay Macuil regarding status;	0.20	\$450	90.00
04/16/2024	CCA	Research regarding distinction between profit and nonprofit regulations under RLUIPA	0.80	\$450	360.00
04/16/2024	CCA	Prepare introduction for motion to dismiss and cases on supplemental jurisdiction over state law claims	1.00	\$450	450.00
04/16/2024	EMR	Review and analysis of different requirements for filing a motion to dismiss under rule 12(b)(1) versus 12(b)(6).	1.10	\$325	357.50
04/18/2024	CCA	Prepare for call with Church's lawyers	0.40	\$450	180.00
04/18/2024	CCA	Call with opposing counsel regarding status of pleadings and injunction request	0.80	\$450	360.00

4-2024-10

Gammage & Burnham

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RE: Gethsemani Baptist Church

ID MMV 12990-0002

Invoice Date 05/22/2024

Invoice Number 323092

Page 4

Fees

Date	Atty	Description	Hours	Rate	Amount
04/18/2024	CCA	Prepare motion to dismiss complaint for lack of jurisdiction	1.40	\$450	630.00
04/18/2024	EMR	Review and analysis of relevant documents prior to telephone call with Plaintiff's counsel to ensure thoroughness and effectiveness of call.	0.50	\$325	162.50
04/18/2024	EMR	Review and analysis of Federal Rules of Civil Procedure regarding time to respond to complaints as well as additional mailing days.	0.40	\$325	130.00
04/18/2024	EMR	Telephone call with Plaintiff's counsel, Ryan Regula and Charlene Warner, re case strategy, potential joint agreement, and steps necessary to resolve this case.	0.70	\$325	N/C
04/18/2024	MMV	Review emails from Kay Macuil related to police records for Gethseme church	0.20	\$450	N/C
04/19/2024	CCA	Call with City Attorney regarding strategy	0.50	\$450	225.00
04/22/2024	CCA	Emails to city attorney regarding city's position on enforcement	0.30	\$450	135.00
04/22/2024	CCA	Talk to Kay Macuil regarding communication to Church lawyers on use of trucks and related issues	0.30	\$450	135.00
04/23/2024	CCA	Emails to and from Church lawyers re city position and need for preliminary injunction	0.40	\$450	180.00
04/24/2024	CCA	Write motion to dismiss complaint against city and officials	2.20	\$450	990.00
04/24/2024	EMR	Continue to draft motion to dismiss, ensuring all citations are proper and conforming.	1.00	\$325	325.00
04/24/2024	EMR	Continue to draft motion to dismiss, elaborating on the jurisdictional element required under RLUIPA.	0.90	\$325	292.50
04/24/2024	EMR	Continue to draft motion to dismiss, focusing on grounds for dismissal of Plaintiffs' FERA claims.	1.00	\$325	325.00
04/25/2024	CCA	Prepare motion to dismiss complaint and related papers	1.00	\$450	450.00
04/25/2024	EMR	Continue to draft motion to dismiss, focusing on legal analysis related to dismissal of Plaintiffs' FERA claims.	1.00	\$325	325.00
04/25/2024	EMR	Review and analysis of federal case law related to the interpretation of "substantial burden" in the context of FERA.	1.00	\$325	325.00
04/25/2024	EMR	Continue to draft motion to dismiss, focusing on conclusion section and reiterating strong points of each dismissal ground.	1.00	\$325	325.00
04/25/2024	EMR	Review and analysis of federal case law related to the similarities between FERA and RLUIPA and dismissal grounds under each.	1.00	\$325	325.00

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 05/22/2024
Invoice Number 323092
Page 5

Fees					
Date	Atty	Description	Hours	Rate	Amount
04/25/2024	EMR	Review and analysis of federal case law related to when a RLUIPA claim becomes ripe.	0.50	\$325	162.50
04/25/2024	EMR	Continue to draft motion to dismiss, focusing on the inability to bring RLUIPA claims against individuals.	0.90	\$325	292.50
04/26/2024	CCA	Revise motion to dismiss in district court	1.50	\$450	675.00
04/28/2024	EMR	Draft certificate required to accompany motion to dismiss under U.S. District Court of Arizona local rule 12.1.	0.70	\$325	227.50
04/30/2024	CCA	Prepare Guzman declaration	0.60	\$450	270.00
04/30/2024	CCA	Add discussion of ripeness under state law to motion to dismiss	1.00	\$450	450.00
Total Fees			55.00		21,207.50

Disbursements				
Date	Description			Amount
04/09/2024	Photocopy Expense- Color	56 @	0.35	19.60
04/09/2024	Photocopy Expense	2 @	0.25	0.50
04/09/2024	Photocopy Expense	6 @	0.25	1.50
04/09/2024	Photocopy Expense- Color	56 @	0.35	19.60
04/09/2024	Photocopy Expense- Color	40 @	0.35	14.00
Total Disbursements				55.20

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 05/22/2024

RE: Gethsemani Baptist Church

Invoice Number 323092

ID MMV 12990-0002

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Timekeeper	Hours	Rate	Amount	
CCA Artigue, Cameron C.	33.30	450.00	14,985.00	
KB Brown, Kevin	0.70	225.00	157.50	
CLH Hering, Christopher L.	0.60	0.00	0.00	
EMR Russell, Evan M	0.70	0.00	0.00	
EMR Russell, Evan M	13.40	325.00	4,355.00	
MMV Vaz, Manjula M.	2.50	0.00	0.00	
MMV Vaz, Manjula M.	3.80	450.00	1,710.00	
Total Fees			\$21,207.50	
Total Disbursements			55.20	
Discount			-\$2,201.84	
Total Current Charges				\$19,060.86
Less trust applied				-\$19,060.86
Total Balance Due				\$0.00

Trust Account Summary		Payments	Deposits	Balance
<u>Chase IOLTA Trust Account</u>				
4/30/2024	Payment Received from: City of San Luis Check #: 108775 Retainer		50,000.00	\$50,000.00
5/22/2024	Client/Matter Code: 12990/0002 Gethsemani Baptist Church Trust applied to Bill #323092	19,060.86		\$30,939.14

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Attorneys at Law

City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
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PHOENIX, ARIZONA 85004
TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

June 14, 2024

Invoice 325224

ID: MMV 12990-0002
RE: Gethsemani Baptist Church

For Services Rendered Through: May 31, 2024

Balance Forward	\$0.00
Current Fees	\$8,895.00
Total Current Charges	\$8,895.00
Total Due	\$8,895.00

JUN 17 2024

APPROVED

Kay Maria Macuil

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 06/14/2024

RE: Gethsemani Baptist Church

Invoice Number 325224

ID MMV 12990-0002

Page 2

Fees

Date	Atty	Description	Hours	Rate	Amount
05/01/2024	CCA	Prepare Declaration of Jose Guzman	0.80	\$450	360.00
05/06/2024	CCA	Prepare declaration of Jose Guzman	0.50	\$450	225.00
05/06/2024	CCA	Prepare motion to dismiss by reworking arguments on section 1983 liability	2.20	\$450	990.00
05/07/2024	CCA	Prepare motion to dismiss claims against private defendants	1.00	\$450	450.00
05/07/2024	EMR	Review and analysis of Jose Guzman's declaration and proposed changes thereto.	0.30	\$325	97.50
05/08/2024	CCA	Prepare Declaration of Mr. Guzman	1.00	\$450	450.00
05/08/2024	CCA	Add case citations to motion to dismiss	0.90	\$450	405.00
05/10/2024	CCA	Revise motion to dismiss and email to client for review and comment	2.00	\$450	900.00
05/14/2024	CCA	Prepare motion to dismiss and related certificate	2.20	\$450	990.00
05/15/2024	CCA	Prepare notice of status for district court in federal lawsuit	0.80	\$450	360.00
05/15/2024	EMR	Review and finalize Defendant's Motion to Dismiss and corresponding Certification in preparation for filing.	1.50	\$325	487.50
05/15/2024	EMR	Review and analysis of Arizona District Court rules related to whether a "proof of service" is required for electronic filings.	0.40	\$325	130.00
05/15/2024	EMR	Evaluate reasons for Motion to Dismiss being held in abeyance and determine steps necessary to correct the same.	0.50	\$325	162.50
05/15/2024	EMR	Draft Notice of Status to submit to District Court.	0.50	\$325	162.50
05/15/2024	EMR	Telephone call with District Court Clerk re compliance with Court's May 15, 2024, order holding Defendant's Motion to Dismiss in abeyance.	0.20	\$325	65.00
05/16/2024	EMR	Review Plaintiffs' Response to Defendants' Notice of Status.	0.30	\$325	97.50
05/16/2024	EMR	Review Proposed Joint Stipulation.	0.40	\$325	130.00
05/17/2024	CCA	Prepare for and call with Kay Macuil regarding status and strategy for next week's conference with district court	0.60	\$450	270.00
05/17/2024	CCA	Call with opposing counsel regarding conversion of motion, status of injunction hearing, and amendment of complaint	0.70	\$450	315.00

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 06/14/2024
 Invoice Number 325224
 Page 3

Fees

Date	Atty	Description	Hours	Rate	Amount
05/17/2024	EMR	Telephone call with Kay Macuil re strategy for May 21, telephonic conference with Judge Snow.	0.70	\$325	227.50
05/21/2024	CCA	Telephonic status conference with District Court	0.70	\$450	315.00
05/21/2024	CCA	Email to client following call with court	0.20	\$450	90.00
05/23/2024	CCA	Email with City Attorney regarding witness interviews	0.30	\$450	135.00
05/24/2024	CCA	Review draft of proposed status report by plaintiff	0.40	\$450	180.00
05/28/2024	CCA	Email to Church council regarding joint status report	0.30	\$450	135.00
05/28/2024	CCA	Emails to and from Kay Macuil regarding joint status report	0.20	\$450	90.00
05/28/2024	CCA	Prepare statement of City's position for status report to court	1.30	\$450	585.00
05/29/2024	CCA	Review order regarding status of case	0.20	\$450	90.00

Total Fees 21.10 8,895.00

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	16.30	450.00	7,335.00
EMR	Russell, Evan M	4.80	325.00	1,560.00
Total Fees				\$8,895.00

Total Current Charges \$8,895.00

Total Balance Due \$8,895.00

Trust Account Summary

Chase IOLTA Trust Account

		Payments	Deposits	Balance
5/22/2024	Balance as of 05/22/2024			\$50,000.00
5/31/2024	Client/Matter Code: 12990/0002 Gethsemani Baptist Church Trust applied to Bill #323092	19,060.86		\$30,939.14

**GAMMAGE
&
BURNHAM**

Attorneys at Law

City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
jtaylor@sanluisaz.gov

40 NORTH CENTRAL AVENUE
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PHOENIX, ARIZONA 85004
TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

July 16, 2024

Invoice 326477

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: June 30, 2024

Previous Balance	\$8,895.00
Payments	\$0.00
Balance Forward	\$8,895.00
Current Fees	\$10,640.00
Total Current Charges	\$10,640.00
Total Due	\$19,535.00

Prior Invoice Date	Invoice Number	Original Amount	Payments & Credits	Prior Invoice Balance
06/14/2024	325224	\$8,895.00	\$0.00	\$8,895.00
Total Outstanding Balance				\$8,895.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>

Gammage & Burnham

CLIENT: City of San Luis	Invoice Date	07/16/2024
RE: Gethsemani Baptist Church	Invoice Number	326477
ID MMV 12990-0002	Page	2

Fees

Date	Atty	Description	Hours	Rate	Amount
06/04/2024	CCA	Review amended complaint and email to City Attorney	1.00	\$450	450.00
06/04/2024	EMR	Review and analysis of church's First Amended Complaint and corresponding Notice of Filing Amended Pleading.	0.90	\$325	292.50
06/04/2024	KB	Prepare template for new motion to dismiss anticipating Church's amended complaint	0.50	\$225	112.50
06/05/2024	CCA	Legal research re consistency of amended complaint with prior verified pleading	0.50	\$450	225.00
06/07/2024	EMR	Review and analysis of updates to Motion to Dismiss made in light of church's dismissal of individual defendants.	0.50	\$325	162.50
06/07/2024	EMR	Review and analysis of new cases cited by the church in their First Amended Complaint.	0.60	\$325	195.00
06/07/2024	EMR	Draft summary to file of church's First Amended Complaint and implications on case strategy moving forward.	2.30	\$325	747.50
06/07/2024	KB	Draft and edit amended motion to dismiss based on Church's amended complaint	1.00	\$225	225.00
06/10/2024	CCA	Call with Kay Macuil regarding public records and related issues	0.50	\$450	225.00
06/10/2024	CCA	Prepare motion to dismiss amended complaint	2.00	\$450	900.00
06/10/2024	KB	Correspondence re amended motion to dismiss and timeline moving forward	0.20	\$225	45.00
06/11/2024	EMR	Draft Defendant's Certification Under LRCiv 12.1 Regarding Motion to Dismiss Plaintiff's Amended Complaint.	1.70	\$325	552.50
06/11/2024	EMR	Review timeline of case to ensure clear outline of events described in Defendant's Certification Under LRCiv 12.1 Regarding Motion to Dismiss Plaintiff's Amended Complaint.	0.60	\$325	195.00
06/12/2024	CCA	Research regarding ripeness of 1983 claim	0.80	\$450	360.00
06/12/2024	CCA	Add new cases to revised motion to dismiss	1.00	\$450	450.00
06/13/2024	CCA	Revise motion to dismiss first amended complaint	1.00	\$450	450.00
06/13/2024	CCA	Email to Kay regarding watermelons and code compliance	0.10	\$450	45.00
06/13/2024	KB	Correspondence re City of San Luis Motion to Dismiss	0.10	\$225	22.50
06/14/2024	CCA	Revise motion to dismiss by adding new discussion of municipal 1983 liability	1.00	\$450	450.00

Gammage & Burnham

CLIENT: City of San Luis	Invoice Date	07/16/2024
RE: Gethsemani Baptist Church	Invoice Number	326477
ID MMV 12990-0002	Page	3

Fees

Date	Atty	Description	Hours	Rate	Amount
06/14/2024	CCA	Emails to and from Kay Macuil regarding dumpster and scheduling of motion	0.50	\$450	225.00
06/14/2024	EMR	Continue to draft renewed Motion to Dismiss, ensuring correct case cites, adhesion to federal court rules, accuracy of factual allegations, and strength of argument against church's state law claims.	6.60	\$325	2,145.00
06/14/2024	EMR	Review email from Kay Macuil regarding statements from potential fact witnesses.	0.20	\$325	65.00
06/14/2024	EMR	Review and analysis of Arizona District Court Local Rules 7.1 re capitalization of caption pages.	0.30	\$325	97.50
06/14/2024	KB	Correspondence re City of San Luis Motion to Dismiss for C. Artigue and E. Russell	0.20	\$225	45.00
06/17/2024	KB	Updates and correspondence re next steps for City of San Luis Motion to Dismiss	0.10	\$225	22.50
06/18/2024	CCA	Prepare motion to dismiss amended complaint and related papers	3.30	\$450	1,485.00
06/18/2024	EMR	Review and finalize renewed Motion to Dismiss in preparation to file.	0.90	\$325	292.50
06/18/2024	KB	Correspondence re filing City of San Luis Motion to Dismiss	0.10	\$225	22.50
06/19/2024	CCA	Review proposed citation for garbage and email to City Attorney regarding same	0.30	\$450	135.00
Total Fees			28.80		10,640.00

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 07/16/2024
Invoice Number 326477
Page 4

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	12.00	450.00	5,400.00
KB	Brown, Kevin	2.20	225.00	495.00
EMR	Russell, Evan M	14.60	325.00	4,745.00
Total Fees				\$10,640.00

Total Current Charges			\$10,640.00
6/14/2024	Previous balance		\$8,895.00
Net Balance Forward			\$8,895.00
Total Balance Due			\$19,535.00

Trust Account Summary	Payments	Deposits	Balance
<u>Chase IOLTA Trust Account</u>			
6/14/2024			Balance as of 06/14/2024
			\$30,939.14

GAMMAGE & BURNHAM

Attorneys at Law

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Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
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40 NORTH CENTRAL AVENUE
20TH FLOOR
PHOENIX, ARIZONA 85004
TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

August 29, 2024

Invoice 327604

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: July 31, 2024

Previous Balance	\$19,535.00
Payments	-\$19,535.00
Balance Forward	\$0.00
Current Fees	\$10,335.00
Current Expenses	\$0.70
Discount	-\$1,000.00
Total Current Charges	\$9,335.70
Less Trust Applied	-\$9,335.70
Total Due	\$0.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
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Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 08/29/2024

RE: Gethsemani Baptist Church

Invoice Number 327604

ID MMV 12990-0002

Page 2

Fees

Date	Atty	Description	Hours	Rate	Amount
07/08/2024	EMR	Review Stipulation for Extension of Time and corresponding Proposed Order sent by Plaintiff's counsel Ryan Regula.	0.30	\$325	97.50
07/12/2024	EMR	Review and analysis of Order entered by Judge Snow granting Stipulation to Extend Deadlines.	0.10	\$325	32.50
07/25/2024	CCA	Email to City Attorney	0.10	\$450	45.00
07/25/2024	CCA	Review response to motion to dismiss	1.00	\$450	450.00
07/25/2024	EMR	Review and analysis of Plaintiff's Opposition to Defendant's Motion to Dismiss.	1.10	\$325	357.50
07/28/2024	EMR	Draft summary of Plaintiff's Opposition to Defendant's Motion to Dismiss.	2.90	\$325	942.50
07/28/2024	EMR	Review and analysis of additional federal case law cited in Plaintiff's Opposition to Defendant's Motion to Dismiss.	0.90	\$325	292.50
07/30/2024	CCA	Email to city attorney.	0.30	\$450	135.00
07/30/2024	CCA	Review statement of interest by US Justice Department and related press.	1.00	\$450	450.00
07/30/2024	CCA	Read Pakdel opinions re ripeness analysis and outline arguments in response to DOJ Filing.	2.00	\$450	900.00
07/30/2024	EMR	Review and analysis of Statement of Interest filed by United States of America in support of Plaintiff's position.	1.30	\$325	422.50
07/30/2024	EMR	Review news articles concerning the United States' filing of its Statement of Interest in this matter.	0.40	\$325	130.00
07/30/2024	EMR	Review and analysis of Ninth Circuit case law regarding the "law of the circuit" in preparation to draft Reply in Support of Defendant's Motion to Dismiss.	1.10	\$325	357.50
07/30/2024	EMR	Draft Reply in Support of Motion to Dismiss, detailing the "law of the circuit" doctrine and its application to this case.	2.20	\$325	715.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 08/29/2024

RE: Gethsemani Baptist Church

Invoice Number 327604

ID MMV 12990-0002

Page 3

Fees

Date	Atty	Description	Hours	Rate	Amount
07/30/2024	EMR	Continue to draft Defendant's Reply in Support of Motion to Dismiss, highlighting the distinction between finality and exhaustion in the RLUIPA context, and explaining that Defendant has never sought exhaustion from Plaintiff.	1.10	\$325	357.50
07/30/2024	EMR	Review and analysis of 28 USC 517 and cases interpreting the same to determine significance of United States' Statement of Interest.	0.80	\$325	260.00
07/30/2024	EMR	Review and analysis of relevant legal articles discussing the impact of a DOJ Statement of Interest.	1.10	\$325	357.50
07/30/2024	EMR	Review and analysis of the DOJ website to better understand its process in filing Statements of Interest.	0.60	\$325	195.00
07/30/2024	EMR	Draft memorandum to file regarding the significance of DOJ Statements of Interest.	0.80	\$325	260.00
07/30/2024	EMR	Review and analysis of Ninth Circuit Case law regarding the distinction between exhaustion and finality in preparation to draft Defendant's Reply in Support of Motion to Dismiss.	0.80	\$325	260.00
07/30/2024	MMV	Review and respond to City of San Luis regarding Statement of Interest from DOJ	0.10	\$450	45.00
07/30/2024	MMV	Emails with City of San Luis regarding DOJ Statement of Interest: Conversation with Cameron Artigue;	0.30	\$450	135.00
07/31/2024	CCA	Call with City Manager and City Attorney re Justice Department and related strategy matters.	0.50	\$450	225.00
07/31/2024	CCA	Legal research re unpublished ninth circuit opinions on Pakdel ripeness issues	1.70	\$450	765.00
07/31/2024	CCA	Outline and dictate portions of reply to US Justice department filing.	3.00	\$450	1,350.00
07/31/2024	EMR	Draft Stipulation to Extend Deadlines and Corresponding Proposed Order related to Defendant's Reply in Support of Motion to Dismiss.	1.30	\$325	422.50
07/31/2024	EMR	Review and analysis of Arizona District Court Local Rules regarding extending motion deadlines in preparation to draft Stipulation and Proposed Order.	0.60	\$325	195.00
07/31/2024	MMV	Call with Jenny Torres, Kay Macuil and Cameron Artigue regarding DOJ Statement of Interest;	0.40	\$450	180.00
Total Fees			27.80		10,335.00

Disbursements

Date	Description	Amount
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Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 08/29/2024
 Invoice Number 327604
 Page 4

Disbursements

Date	Description	Amount
07/16/2024	Online research; Pacer Service Center - Online research - Q22024	0.70
Total Disbursements		0.70

Timekeeper	Hours	Rate	Amount
CCA	Artigue, Cameron C.	9.60	450.00
EMR	Russell, Evan M	17.40	325.00
MMV	Vaz, Manjula M.	0.80	450.00
Total Fees			\$10,335.00
Total Disbursements			0.70
Discount			-\$1,000.00
Total Current Charges			\$9,335.70
7/16/2024	Previous balance		\$19,535.00
07/29/2024	Payment from Trust Account		-\$8,895.00
07/29/2024	Payment from Trust Account		-\$10,640.00
Net Balance Forward			\$0.00
Less trust applied			-\$9,335.70
Total Balance Due			\$0.00

Trust Account Summary		Payments	Deposits	Balance
Chase IOLTA Trust Account				
7/16/2024	Balance as of 07/16/2024			\$30,939.14
7/31/2024	Client/Matter Code: 12990/0002 Gethsemani Baptist Church Trust applied to Bill #325224	8,895.00		\$22,044.14
7/31/2024	Client/Matter Code: 12990/0002 Gethsemani Baptist Church Trust applied to Bill #326477	10,640.00		\$11,404.14
8/29/2024	Client/Matter Code: 12990/0002 Gethsemani Baptist Church Trust applied to Bill #327604	9,335.70		\$2,068.44

**GAMMAGE
&
BURNHAM**
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20TH FLOOR
PHOENIX, ARIZONA 85004
TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

September 11, 2024

Invoice 328664

ID: MMV 12990-0002
RE: Gethsemani Baptist Church

For Services Rendered Through: August 31, 2024

Balance Forward	\$0.00
Current Fees	\$24,950.00
Total Current Charges	\$24,950.00
Less Trust Applied	-\$2,068.44
Total Due	\$22,881.56

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
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BALANCE OF \$50K ENDS HERE
RETAINED

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 09/11/2024

RE: Gethsemani Baptist Church

Invoice Number 328664

ID MMV 12990-0002

Page 2

Fees

Date	Atty	Description	Hours	Rate	Amount
08/01/2024	CCA	Dictate draft of response to Justice Department statement of interest	2.50	\$450	1,125.00
08/01/2024	CCA	Legal research re ninth circuit decisions on ripeness requirements since Knick and Pakdel decisions	1.00	\$450	450.00
08/01/2024	EMR	Review and analysis of Department of Justice press release regarding the United States' Statement of Interest filed in this matter.	0.40	\$325	130.00
08/01/2024	MMV	Email to Cameron Artigue regarding DOJ press release; Review DOJ press release	0.20	\$450	90.00
08/02/2024	CCA	Prepare argument re exhaustion and finality requirements	2.00	\$450	900.00
08/02/2024	CCA	Obtain stipulation re due date for answering brief on ripeness	0.50	\$450	225.00
08/05/2024	CCA	Review cases re differences between prudential and jurisdictional ripeness	0.90	\$450	405.00
08/06/2024	CCA	Review case law from around the Ninth Circuit on exhaustion	2.20	\$450	990.00
08/06/2024	CCA	Write discussion of effect of precedent and duty to obey it	1.50	\$450	675.00
08/06/2024	EMR	Finalize Stipulation to Extend Time and corresponding Proposed Order	0.30	\$325	97.50
08/06/2024	EMR	Exchange emails with Ryan Regula re Stipulation to Extend Time and corresponding Proposed Order.	0.20	\$325	65.00
08/07/2024	CCA	Review legislative history of RLUIPA and impact of Boerene decision	1.00	\$450	450.00
08/07/2024	CCA	Research re role and scope of DOJ participation	0.50	\$450	225.00
08/07/2024	CCA	Draft portions of reply brief	1.50	\$450	675.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 09/11/2024

RE: Gethsemani Baptist Church

Invoice Number 328664

ID MMV 12990-0002

Page 3

Fees

Date	Atty	Description	Hours	Rate	Amount
08/07/2024	EMR	Exchange additional emails with Ryan Regula regarding any potential objection from his client regarding the Stipulation to Extend Time and corresponding Proposed Order.	0.20	\$325	65.00
08/07/2024	EMR	Review and analysis of Church's Opposition to the City's Motion to Dismiss, focusing on their arguments in support of their 1983 claims.	0.40	\$325	130.00
08/07/2024	EMR	Review and analysis of federal case law regarding the final decision requirement in the context of 1983 claims.	0.80	\$325	260.00
08/07/2024	EMR	Review and analysis of federal case law cited by the Church in their Opposition to the City's Motion to Dismiss.	0.90	\$325	292.50
08/07/2024	EMR	Review and analysis of federal case law addressing the pattern of discriminatory behavior required for a plaintiff to maintain a 1983 claim against the government.	1.10	\$325	357.50
08/07/2024	EMR	Draft City's Reply in Support of its Motion to Dismiss, focusing on outlining responses to Church's arguments in support of its 1983 claims.	1.60	\$325	520.00
08/08/2024	EMR	Review and analysis of Federal Rules of Civil Procedure and Local Arizona District Court Rules to determine presumptive page limit for reply memoranda.	0.40	\$325	130.00
08/08/2024	EMR	Draft Motion to Exceed Page Limits and corresponding Proposed Order granting the same.	1.30	\$325	422.50
08/09/2024	CCA	Dictate portion of brief regarding nonconforming use issues	1.00	\$450	450.00
08/09/2024	CCA	Legal research re effect of recent supreme court decisions on RLUIPA cases generally	1.20	\$450	540.00
08/09/2024	CCA	More research on 1983 claim and deliberate indifference standard	0.90	\$450	405.00
08/09/2024	EMR	Revise Motion to Exceed Page Limits and corresponding Proposed Order.	0.40	\$325	130.00
08/09/2024	EMR	Review and analysis of Judge Snow's grant of Parties' Stipulation to Extend Deadlines.	0.20	\$325	65.00
08/12/2024	CCA	Prepare section on 1983 claim for reponse	1.20	\$450	540.00
08/12/2024	CCA	Research re scope and effect of DOJ submissions	0.80	\$450	360.00
08/12/2024	CCA	Thorough edit of response to DOJ submission and reply brief	2.20	\$450	990.00
08/13/2024	CCA	Prepare summary of litigation background for Senator Kelly	1.00	\$450	450.00
08/13/2024	MMV	Call with Kay Macuil regarding request for Senator Kelly	0.20	\$450	90.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 09/11/2024

RE: Gethsemani Baptist Church

Invoice Number 328664

ID MMV 12990-0002

Page 4

Fees

Date	Atty	Description	Hours	Rate	Amount
08/14/2024	CCA	Review and prepare narrative of case for Sen. Kelly and review edits by Kay	1.00	\$450	450.00
08/14/2024	CCA	Draft section of argument re exhaustion of administrative remedies	1.20	\$450	540.00
08/15/2024	CCA	Prepare stipulation to combine filings	0.40	\$450	180.00
08/15/2024	CCA	Research re 1983 claims and exhaustion requirements	1.00	\$450	450.00
08/15/2024	CCA	Revise reply memorandum	1.20	\$450	540.00
08/15/2024	EMR	Finalize Motion to Exceed Page Limits and corresponding Proposed Order prior to sending to opposing counsel for approval.	0.50	\$325	162.50
08/15/2024	EMR	Email Ryan Regula re Motion to Exceed Page Limits.	0.20	\$325	65.00
08/16/2024	CCA	Prepare opposition to motion to dismiss	1.50	\$450	675.00
08/16/2024	EMR	Revise Motion to Exceed Page Limits to include sentence regarding no objections from the Church.	0.20	\$325	65.00
08/16/2024	EMR	Exchange emails with Ryan Regula re filing of Motion to Exceed Page Limits.	0.20	\$325	65.00
08/18/2024	EMR	Review and analysis of Church's arguments in Opposition to City's Motion to Dismiss the Church's state law claims.	0.50	\$325	162.50
08/18/2024	EMR	Draft City's Motion to Dismiss, focusing on section related to potential dismissal of Church's state law claims under FERA.	2.50	\$325	812.50
08/19/2024	CCA	Revise discussion of futility and final decision arguments	1.40	\$450	630.00
08/21/2024	EMR	Review and analysis of Judge Snow's Order granting the City's Motion for Leave to File Combined Response and Reply that Exceeds Page Limits.	0.20	\$325	65.00
08/21/2024	EMR	Vet and formulate all citations included in the City's Reply in Support of its Motion to Dismiss to ensure compliance with all relevant Bluebook provisions.	3.60	\$325	1,170.00
08/21/2024	EMR	Revise and polish City's entire Reply in Support of Motion to Dismiss.	0.80	\$325	260.00
08/21/2024	EMR	Review and summarize the United States' position on and understanding of the Guatay case as articulated in its Statement of Interest.	1.20	\$325	390.00
08/21/2024	EMR	Review and summarize the United States' argument concerning the potential applicability of 42 U.S.C. 2000cc(a)(2)(B) to the present case as articulated in its Statement of Interest.	0.50	\$325	162.50

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 09/11/2024

RE: Gethsemani Baptist Church

Invoice Number 328664

ID MMV 12990-0002

Page 5

Fees

Date	Atty	Description	Hours	Rate	Amount
08/22/2024	CCA	Thorough edit and revision of response to United States and reply in support of motion to dismiss	2.90	\$450	1,305.00
08/23/2024	CCA	Incorporate new responses to United States arguments on commerce clause and final decision requirement	1.00	\$450	450.00
08/26/2024	EMR	Review and analysis of documents sent by Kay Macuil in support of factual changes to be made to Reply in Support of Motion to Dismiss.	0.60	\$325	195.00
08/27/2024	CCA	Thorough edit of motion document and incorporate comments by city attorney	2.60	\$450	1,170.00
08/28/2024	CCA	Incorporate edits from various people and do through read thru and comprehensive edit	3.50	\$450	1,575.00
08/28/2024	EMR	Revise Reply in Support of Motion to Dismiss to include citations to additional cases and add conclusion.	0.50	\$325	162.50
08/29/2024	CCA	Finalize reply filing and email to Kay Macuil re filing and comments to Justice Department	1.00	\$450	450.00
08/29/2024	EMR	Revise Reply in Support of Motion to Dismiss to include additional pincites to relevant case law.	0.30	\$325	97.50
Total Fees			61.00		24,950.00

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 09/11/2024
 Invoice Number 328664
 Page 6

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	40.60	450.00	18,270.00
EMR	Russell, Evan M	20.00	325.00	6,500.00
MMV	Vaz, Manjula M.	0.40	450.00	180.00
Total Fees				\$24,950.00

Total Current Charges **\$24,950.00**

Less trust applied -\$2,068.44

Total Balance Due **\$22,881.56**

Trust Account Summary		Payments	Deposits	Balance
<u>Chase IOLTA Trust Account</u>				
8/29/2024	Balance as of 08/29/2024			\$11,404.14
8/29/2024	Client/Matter Code: 12990/0002 Gethsemani Baptist Church Trust applied to Bill #327604	9,335.70		\$2,068.44
9/11/2024	Client/Matter Code: 12990/0002 Gethsemani Baptist Church Trust applied to Bill #328664	2,068.44		\$0.00

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&
BURNHAM**

Attorneys at Law

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TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
jtaylor@sanluisaz.gov

COPY

November 18, 2024

ID: MMV 12990-0002
RE: Gethsemani Baptist Church

For Services Rendered Through: October 31, 2024

Previous Balance	\$22,881.56
Payments	\$0.00
Balance Forward	\$22,881.56
Current Fees	\$1,747.50
Total Current Charges	\$1,747.50
Total Due	\$24,629.06

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 11/18/2024
Invoice Number 330807
Page 2

Prior Invoice Date	Invoice Number	Original Amount	Payments & Credits	Prior Invoice Balance
09/11/2024	328664	\$24,950.00	\$2,068.44	\$22,881.56
Total Outstanding Balance				\$22,881.56

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 11/18/2024
Invoice Number 330807
Page 4

Timekeeper	Hours	Rate	Amount
CCA Artigue, Cameron C.	0.20	450.00	90.00
EMR Russell, Evan M	5.10	325.00	1,657.50
Total Fees			\$1,747.50

Total Current Charges **\$1,747.50**

10/3/2024 Previous balance \$22,881.56

Net Balance Forward **\$22,881.56**

Total Balance Due **\$24,629.06**

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 11/18/2024
Invoice Number 330807
Page 3

Fees					
Date	Atty	Description	Hours	Rate	Amount
10/11/2024	CCA	Review order re oral argument and email to client	0.20	\$450	90.00
10/14/2024	EMR	Review and analysis of Judge Snow's Order setting Oral Argument for November 14, 2024.	0.20	\$325	65.00
10/15/2024	EMR	Telephone call with Judge Snow's clerk re virtual access to oral argument.	0.20	\$325	65.00
10/15/2024	EMR	Email Ryan Regula re virtual access to upcoming oral argument.	0.20	\$325	65.00
10/15/2024	EMR	Email to Kay Macuil regarding procedure for gaining remote access to November 14, Oral Argument.	0.20	\$325	65.00
10/16/2024	EMR	Draft Stipulation for Remote Access and corresponding Proposed Order to circulate to plaintiff.	1.10	\$325	357.50
10/17/2024	EMR	Email to Ryan Regula regarding Stipulation for Remote Access and corresponding Proposed Order.	0.20	\$325	65.00
10/23/2024	EMR	Exchange emails with Ryan Regula to follow-up on outstanding Stipulation for Remote Access and corresponding Proposed Order.	0.30	\$325	97.50
10/24/2024	EMR	Email to Kay Macuil regarding filing of Stipulation for Remote Access and corresponding Proposed Order.	0.20	\$325	65.00
10/28/2024	EMR	Email to Kay Macuil regarding Judge Snow's Order Granting Remote Access.	0.20	\$325	65.00
10/28/2024	EMR	Exchange emails with Vickie Guidas, Judge Snow's clerk, regarding dial-in access for November 14, Oral Argument.	0.20	\$325	65.00
10/28/2024	EMR	Review and analysis of Order entered by Judge Snow granting remote access for November 14, Oral Argument.	0.20	\$325	65.00
10/29/2024	EMR	Exchange emails Kay Macuil regarding dial-in access for November 14, Oral Argument.	0.30	\$325	97.50
10/30/2024	EMR	Prepare Oral Argument binder ahead of November 14, 2024, Oral Argument.	1.60	\$325	520.00
Total Fees			5.30		1,747.50

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 01/09/2024

RE: RLUIPA Lawsuit

Invoice Number 319795

ID MMV 12990-0001

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Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	6.00	450.00	2,700.00
MMV	Vaz, Manjula M.	2.40	450.00	1,080.00
Total Fees				\$3,780.00

Total Current Charges **\$3,780.00**

Less trust applied -\$1,105.00

Total Balance Due **\$2,675.00**

Trust Account Summary		Payments	Deposits	Balance
<u>Chase IOLTA Trust Account</u>				
12/20/2023	Balance as of 12/20/2023			\$2,500.00
12/22/2023	Client/Matter Code: 12990/0001 RLUIPA Lawsuit Trust applied to Bill #318176	1,395.00		\$1,105.00
1/9/2024	Client/Matter Code: 12990/0001 RLUIPA Lawsuit Trust applied to Bill #319795	1,105.00		\$0.00

**GAMMAGE
&
BURNHAM**

Attorneys at Law

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City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
jtaylor@sanluisaz.gov

February 24, 2025

Invoice 334078

COPY

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: January 31, 2025

Previous Balance	\$24,629.06
Payments	-\$24,629.06
Balance Forward	\$0.00
Current Fees	\$30,405.00
Total Current Charges	\$30,405.00
Total Due	\$30,405.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 02/24/2025
Invoice Number 334078
Page 2

Fees						
Date	Atty	Description	Hours	Rate	Amount	
11/03/2024	CCA	Emails to and from Justice Department re participation in argument	0.30	\$450	135.00	
11/04/2024	EMR	Review and analysis of emails received from United States attorney Noah Sacks concerning appearance at November 14, oral argument.	0.20	\$325	65.00	
11/05/2024	CCA	Emails to and from Department of Justice re participation in argument	0.80	\$450	360.00	
11/06/2024	CCA	Prepaere for federal court hearing on motion to dismiss	1.00	\$450	450.00	
11/08/2024	EMR	Review United States's Unopposed Motion for Leave to Argue and Modify Argument Times and corresponding Proposed Order.	0.40	\$325	130.00	
11/10/2024	CCA	Email to client re status	0.30	\$450	135.00	
11/10/2024	CCA	Begin preparation for oral argument in district court	2.00	\$450	900.00	
11/11/2024	EMR	Draft summary and outline of significant points to reinforce during November 14 oral argument.	2.30	\$325	747.50	
11/11/2024	EMR	Review case file to determine specific dates and information concerning citations issued to Plaintiff by the City.	0.30	\$325	97.50	
11/12/2024	CCA	Email to client re questions	0.40	\$450	180.00	
11/12/2024	CCA	Review briefs and prepare for oral argument	1.50	\$450	675.00	
11/12/2024	EMR	Review and analysis of Judge Snow's Order concerning Oral Argument details ahead of November 14, oral argument.	0.20	\$325	65.00	
11/12/2024	EMR	Review federal court docket to determine whether Judge Snow issued an order concerning the United States' request for appearance at oral argument.	0.20	\$325	65.00	
11/13/2024	CCA	Review pleadings and prepare for hearing in district court	2.00	\$450	900.00	
11/13/2024	EMR	Review and analysis of endorsed Order granting Unopposed Motion for Leave issued by Judge Snow.	0.20	\$325	65.00	

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 02/24/2025
Invoice Number 334078
Page 3

Fees					
Date	Atty	Description	Hours	Rate	Amount
11/13/2024	EMR	Draft Notice of Citation to Supplemental Authority.	1.10	\$325	357.50
11/14/2024	CCA	Outline and practice argument for hearing on motion to dismiss in district court	2.50	\$450	1,125.00
11/14/2024	CCA	Attend and argue motion to dismiss on behalf of city	2.00	\$450	900.00
11/14/2024	EMR	Exchange emails with Kay Macuil concerning information required to access oral argument virtually.	0.20	\$325	65.00
11/14/2024	EMR	Exchange additional emails with Kay Macuil concerning schedule for oral argument and rules for virtual attendance.	0.20	\$325	65.00
11/14/2024	EMR	Draft summary of November 14, oral argument for Kay Macuil and other City representatives.	1.90	\$325	617.50
11/22/2024	CCA	Review district court decision and email client	0.50	\$450	225.00
11/22/2024	EMR	Review and analysis of Judge Snow's Order denying Defendant's Motion to Dismiss.	0.90	\$325	292.50
11/25/2024	EMR	Review Federal Rules of Civil Procedure to determine proper timeline moving forward in light of Judge Snow's denial of Motion to Dismiss.	0.40	\$325	130.00
11/29/2024	EMR	Draft Answer to Plaintiff's First Amended Complaint, focusing on factual allegations section.	1.40	\$325	455.00
12/02/2024	EMR	Review and analysis of Federal Rules of Civil Procedure 12(a) to determine proper answer filing deadline in light of denial of Motion to Dismiss.	0.30	\$325	97.50
12/03/2024	EMR	Draft Answer to Plaintiff's First Amended Complaint.	3.90	\$325	1,267.50
12/04/2024	EMR	Evaluate responses to complaint and affirmative defenses to be included in forthcoming answer.	0.40	\$325	130.00
12/05/2024	CCA	Call with Kay Macuil re answer	0.30	\$450	135.00
12/05/2024	CCA	Edit and revise answer to complaint	1.00	\$450	450.00
12/05/2024	EMR	Exchange emails with Kay Macuil re draft Answer to Plaintiff's First Amended Complaint.	0.20	\$325	65.00
12/05/2024	EMR	Continue to draft Answer to Plaintiff's First Amended Complaint, incorporating changes received from the City.	0.50	\$325	162.50
12/06/2024	EMR	Finalize Answer to Plaintiff's First Amended Complaint before filing.	0.30	\$325	97.50
12/16/2024	CCA	Prepare for and call with Kay Macuil re status and strategy of lawsuit	0.60	\$450	270.00
12/16/2024	EMR	Telephone call with K. Macuil re strategy for forthcoming executive session.	0.60	\$325	195.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 02/24/2025

RE: Gethsemani Baptist Church

Invoice Number 334078

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
12/16/2024	EMR	Review Judge Murray's scheduling order to determine discovery priorities over next two months.	0.30	\$325	97.50
12/16/2024	EMR	Exchange emails with Kay Macuil re forthcoming conference call.	0.20	\$325	65.00
12/16/2024	EMR	Review and analysis of Federal Rules of Civil Procedure re filing deadlines for amending as a matter of course.	0.20	\$325	65.00
12/16/2024	EMR	Draft Amended Answer to Plaintiff's First Amended Complaint.	0.50	\$325	162.50
12/16/2024	EMR	Draft Notice of Filing Amended Answer required by Arizona District Court Local Rules 15.1.	0.90	\$325	292.50
12/17/2024	CCA	Review amended answer	0.30	\$450	135.00
12/17/2024	EMR	Finalize Amended Answer and corresponding Notice prior to filing the same.	0.50	\$325	162.50
12/23/2024	CCA	Outline plan for discovery schedule	0.30	\$450	135.00
12/26/2024	CCA	Prepare disclosure and outline discovery requests	1.00	\$450	450.00
12/30/2024	EMR	Review and analysis of Settlement Demand circulated by Plaintiff's Counsel.	0.30	\$325	97.50
12/31/2024	EMR	Exchange emails with Ryan Regula re forthcoming scheduling conference call.	0.20	\$325	65.00
01/03/2025	CCA	Call with opposing counsel re Rule 16 case management order	1.00	\$450	450.00
01/03/2025	EMR	Preparatory telephone call re forthcoming Rule 26 Meet and Confer.	1.00	\$325	325.00
01/03/2025	EMR	Appear for Rule 26 Meet and Confer with Plaintiff's Counsel.	0.60	\$325	195.00
01/03/2025	EMR	Review and analysis of American Law of Zoning chapters concerning legal nonconfirming use.	0.50	\$325	162.50
01/03/2025	EMR	Email summary to K. Macuil re Rule 26 Meet and Confer.	0.30	\$325	97.50
01/05/2025	CCA	Review proposed disclosure and research re immunity of Mayor to discovery	1.00	\$450	450.00
01/05/2025	EMR	Exchange emails with K. Macuil re further discussion on Rule 26 Meet and Confer.	0.20	\$325	65.00
01/06/2025	CCA	Research re fee provisions	0.30	\$450	135.00
01/06/2025	EMR	Exchange emails with K. Macuil re rescheduling of planned discussion.	0.20	\$325	65.00
01/07/2025	CCA	Call with Kay and Glenn re strategy and council executive session	1.00	\$450	450.00

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 02/24/2025
Invoice Number 334078
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Fees					
Date	Atty	Description	Hours	Rate	Amount
01/07/2025	EMR	Telephone call with K. Macuil and G. Gimbut re overall case strategy and decisions moving forward.	1.00	\$325	325.00
01/08/2025	CCA	Prepare for executive session with City council	0.50	\$450	225.00
01/08/2025	CCA	Participate in executive session and give update and discuss strategy	0.60	\$450	270.00
01/08/2025	EMR	Revise and organize notes from executive session.	0.30	\$325	97.50
01/08/2025	EMR	Appear for San Luis city council meeting and executive session to discuss path forward in lawsuit.	2.60	\$325	845.00
01/09/2025	CCA	Email to Kay re status	0.50	\$450	225.00
01/09/2025	CCA	Review options for discovery	1.00	\$450	450.00
01/09/2025	EMR	Finalize notes from executive session meeting before sending the same to K. Macuil.	0.50	\$325	162.50
01/09/2025	EMR	Evaluate case strategy moving forward in light of executive session and city council decision moving forward.	0.40	\$325	130.00
01/09/2025	EMR	Revise notes from executive session to reflect changes requested by K. Macuil.	0.20	\$325	65.00
01/10/2025	CCA	Emails to and from Kay re status of city court citations and position on discovery	0.80	\$450	360.00
01/13/2025	CCA	Review photos	0.30	\$450	135.00
01/13/2025	CCA	Outline revisions to proposed case management order	0.50	\$450	225.00
01/13/2025	EMR	Review draft Case Management Report sent by Plaintiff's counsel.	0.30	\$325	97.50
01/13/2025	EMR	Review photographs posted on Facebook by both Pastor Castro and Gethsemani Food Ministry,	0.30	\$325	97.50
01/14/2025	EMR	Draft Defendant's Position to include in Case Management Report.	2.20	\$325	715.00
01/14/2025	EMR	Review and analysis of Federal Rules of Civil Procedure concerning discovery limits and depositions.	0.50	\$325	162.50
01/14/2025	EMR	Debrief with K. Brown re forthcoming task of gathering all of Pastor Castro's and Church's online posts.	0.50	\$325	162.50
01/14/2025	EMR	Draft Defendant's Initial Disclosure Statement.	1.80	\$325	585.00
01/14/2025	EMR	Draft Notice of Serving Initial Disclosure Statement.	0.30	\$325	97.50
01/14/2025	EMR	Review and analysis of Arizona District Court local rules re Notice of Serving Initial Disclosure.	0.20	\$325	65.00
01/14/2025	KB	Analyzing Church's social media presence for relevant information and photographs on lawsuit	2.10	\$225	472.50

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 02/24/2025
Invoice Number 334078
Page 6

Fees					
Date	Atty	Description	Hours	Rate	Amount
01/15/2025	CCA	Review proposed disclosure and research re immunity of Mayor to discovery	1.00	\$450	450.00
01/15/2025	EMR	Finalize Case Management Report before sending to R. Regula.	0.30	\$325	97.50
01/15/2025	EMR	Exchange emails with K. Macuil re draft Initial Disclosure Statement.	0.20	\$325	65.00
01/15/2025	EMR	Finalize Initial Disclosure Statement before sending to K. Macuil.	0.30	\$325	97.50
01/15/2025	EMR	Exchange emails with R. Regula re draft Case Management Report.	0.20	\$325	65.00
01/16/2025	CCA	Propose changes to case management order	0.60	\$450	270.00
01/16/2025	EMR	Review Plaintiff's final edits to Case Management Report.	0.20	\$325	65.00
01/16/2025	EMR	Revise draft Case Management Report to outline potential discovery disagreements between the parties.	0.40	\$325	130.00
01/17/2025	EMR	Telephone call with R. Regula re final changes to Case Management Report.	0.30	\$325	97.50
01/17/2025	EMR	Telephone call with K. Macuil re changes to Initial Disclosure.	0.30	\$325	97.50
01/17/2025	EMR	Review and analysis of photographs sent by K. Macuil of the Food Ministry.	0.20	\$325	65.00
01/17/2025	EMR	Review and analysis of Plaintiff's Initial Disclosure Statement.	0.30	\$325	97.50
01/17/2025	EMR	Exchange emails with R. Regula re final revisions to Case Management Report.	0.20	\$325	65.00
01/17/2025	EMR	Finalize Initial Disclosure Statement incorporating changes from K. Macuil.	0.60	\$325	195.00
01/17/2025	EMR	Exchange additional emails with R. Regula re Plaintiff's filing of the Case Management Report.	0.20	\$325	65.00
01/20/2025	EMR	Draft summary of Plaintiff's Initial Disclosure Statement to file.	0.30	\$325	97.50
01/21/2025	EMR	Review and analysis of Plaintiff's Motion to Withdraw as Counsel and corresponding Proposed Order.	0.20	\$325	65.00
01/22/2025	EMR	Review and analysis of City's dismissal of municipal charges against Pastor Castro.	0.30	\$325	97.50
01/22/2025	EMR	Exchange emails with K. Macuil re meeting with members of Church neighborhood who may be willing to testify as witnesses.	0.20	\$325	65.00

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 02/24/2025
Invoice Number 334078
Page 7

Fees

Date	Atty	Description	Hours	Rate	Amount
01/23/2025	EMR	Review and analysis of Pastor Castro's Affidavit with Verification and Certificate of Translation.	0.20	\$325	65.00
01/24/2025	EMR	Appear for Scheduling Conference with Judge Snow.	0.50	\$325	162.50
01/24/2025	EMR	Prepare for scheduling conference with Judge Snow.	0.20	\$325	65.00
01/24/2025	EMR	Evaluate case strategy moving forward in light of scheduling conference.	0.30	\$325	97.50
01/24/2025	EMR	Discussion w I. Gonzalez re his potential assistance with San Luis matter.	0.30	\$325	97.50
01/24/2025	EMR	Review final Case Management Order entered by Judge Snow.	0.20	\$325	65.00
01/24/2025	EMR	Draft summary of Case Management Conference for K. Macuil.	0.30	\$325	97.50
01/27/2025	CCA	Research re foreign language depositions and legislative immunity	1.40	\$450	630.00
01/27/2025	EMR	Correspond with I. Gonzalez re his findings on Facebook pages of Pastor Castro and the Food Ministry.	0.20	\$325	65.00
01/27/2025	EMR	Leave voicemail for K. Macuil re further discussion on potential trial witnesses and testimony.	0.20	\$325	65.00
01/27/2025	IG	Review relevant documents in case file including complaint and order denying Defendant's motion to dismiss.	1.80	\$325	585.00
01/28/2025	EMR	Telephone call w K. Macuil re potential testimony of Mayor Riedel.	0.30	\$325	97.50
01/29/2025	CCA	Outline all legal contentions and update research on commercial activities argument	2.00	\$450	900.00
01/29/2025	EMR	Continue review of Pastor Castro's and Food Ministry's Facebook profiles to find relevant information about costs of food.	0.80	\$325	260.00
01/29/2025	EMR	Discussion with I. Gonzalez and C. C. Artigue re I. Gonzalez's assistance with the trial moving forward.	1.00	\$325	325.00
01/29/2025	IG	Review various documents in case file and publicly available information to assist with discovery strategy.	1.70	\$325	552.50
01/29/2025	IG	Confer with team re: litigation strategy.	1.00	\$325	325.00
01/29/2025	TR	Review Complaint and conduct background research related to the Church and its pastor Jose Manuel Castro and provide details to Attorney Gonzalez.	1.20	\$225	270.00
01/30/2025	IG	Confer with E. Russell re: discovery strategy.	0.30	\$325	97.50

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 02/24/2025
 Invoice Number 334078
 Page 8

Fees					
Date	Atty	Description	Hours	Rate	Amount
01/30/2025	TR	Multiple communications with First Legal regarding forensic collection of social media accounts.	0.40	\$225	90.00
01/31/2025	CCA	Outline master matrix of legal issues for motion and trial	1.40	\$450	630.00
01/31/2025	CCA	Legal research on commercial uses and RLUIPA	0.50	\$450	225.00
01/31/2025	CCA	Outline discovery requests	0.50	\$450	225.00
Total Fees			82.50		30,405.00

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	31.70	450.00	14,265.00
KB	Brown, Kevin	2.10	225.00	472.50
IG	Gonzalez, Ivan	4.80	325.00	1,560.00
TR	Roa, Traci	1.60	225.00	360.00
EMR	Russell, Evan M	42.30	325.00	13,747.50
Total Fees				\$30,405.00

Total Current Charges **\$30,405.00**

11/18/2024	Previous balance	\$24,629.06
12/10/2024	Payment - Thank you, Check # 110737	-\$22,881.56
12/10/2024	Payment - Thank you, Check # 110737	-\$1,747.50

Net Balance Forward **\$0.00**

Total Balance Due	\$30,405.00
--------------------------	--------------------

GAMMAGE & BURNHAM

Attorneys at Law

City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
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40 NORTH CENTRAL AVENUE
20TH FLOOR
PHOENIX, ARIZONA 85004
TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

March 20, 2025

Invoice 335160

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: February 28, 2025

Previous Balance	\$30,405.00
Payments	-\$30,405.00
Balance Forward	\$0.00
Current Fees	\$10,692.50
Total Current Charges	\$10,692.50
Total Due	\$10,692.50

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis

RE: Gethsemani Baptist Church

ID MMV 12990-0002

Invoice Date 03/20/2025

Invoice Number 335160

Page 2

Fees

Date	Atty	Description	Hours	Rate	Amount
02/03/2025	EMR	Exchange emails with K. Macuil re potential witness meetings.	0.20	\$325	65.00
02/04/2025	EMR	Review Google Maps area of Pastor Castro's home address to determine proximity to food ministry site.	0.30	\$325	97.50
02/04/2025	EMR	Review and analysis of draft outline of legal/factual issues in this matter.	0.30	\$325	97.50
02/04/2025	IG	Analyze legal issues in dispute to assist with written discovery.	0.30	\$325	97.50
02/06/2025	EMR	Review and analysis of documents evidencing Plaintiff's tax exempt status from 2000-2010.	0.80	\$325	260.00
02/06/2025	EMR	Exchange emails with J. Taylor re forthcoming potential witness meeting.	0.20	\$325	65.00
02/06/2025	IG	Analyze next steps as it pertains to preserving Plaintiff's Facebook data.	0.20	\$325	65.00
02/11/2025	EMR	Exchange emails with K. Macuil re need for potential witness meetings prior to March 20 due to impending subpoena and deposition notice deadline.	0.20	\$325	65.00
02/12/2025	EMR	Review and analysis of Amicus Brief filed in separate first amendment matter by First Liberty Institute.	0.50	\$325	162.50
02/12/2025	EMR	Exchange emails with K. Macuil re additional availability to meet with potential witnesses.	0.20	\$325	65.00
02/12/2025	IG	Review portion of First Liberty Institute amicus brief describing subject litigation.	0.10	\$325	32.50
02/12/2025	IG	Confer with E. Russel re: witness meeting strategy.	0.20	\$325	65.00
02/13/2025	EMR	Draft Requests for Production to Plaintiff.	2.80	\$325	910.00
02/13/2025	IG	Analyze information to be ascertained as it pertains to upcoming witnesses meeting.	0.20	\$325	65.00
02/13/2025	IG	Send email to K. Macuil re: witnesses meeting.	0.10	\$325	32.50

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 03/20/2025

RE: Gethsemani Baptist Church

Invoice Number 335160

ID MMV 12990-0002

Page 3

Fees

Date	Atty	Description	Hours	Rate	Amount
02/14/2025	EMR	Draft Non-Uniform Interrogatories to Plaintiff.	3.10	\$325	1,007.50
02/17/2025	EMR	Draft Requests for Admission to Plaintiff.	1.80	\$325	585.00
02/18/2025	EMR	Exchange emails with K. Macuil re scheduling conflict for potential witness meeting.	0.20	\$325	65.00
02/18/2025	IG	Review scheduling and strategy for upcoming meeting with potential witnesses.	0.20	\$325	65.00
02/19/2025	IG	Determine questions to ask witnesses during tomorrow's call.	0.20	\$325	65.00
02/20/2025	EMR	Review Facebook photos and videos posted by Pastor regarding the scale and operation of the Food Ministry.	0.50	\$325	162.50
02/20/2025	EMR	Review photographs and police report re accident involving Pastor Castro's truck, forwarded by K. Macuil.	0.70	\$325	227.50
02/20/2025	EMR	Review conditional use language used in Amicus Brief filed by First Liberty Institute in separate first amendment case.	0.30	\$325	97.50
02/20/2025	EMR	Appear for Zoom meeting with potential witnesses Angelica and Salvador Torres.	1.30	\$325	422.50
02/20/2025	EMR	Prepare questions for potential witnesses prior to Zoom meeting.	1.20	\$325	390.00
02/20/2025	EMR	Exchange emails with K. Macuil re finalizing times for potential witness meeting.	0.20	\$325	65.00
02/20/2025	EMR	Exchange emails with K. Macuil re contact information for Angelica Torres, a potential witness in this matter.	0.20	\$325	65.00
02/20/2025	IG	Review relevant documents in case file in preparation for witness call.	0.70	\$325	227.50
02/20/2025	IG	Zoom call with E. Russell, city attorney and staff, and witnesses.	1.20	\$325	390.00
02/20/2025	IG	Confer with E. Russell re: witness call and discovery strategy.	0.50	\$325	162.50
02/21/2025	IG	Review email correspondence and attachments from K. Macuil re: First Liberty amicus brief and Torres accident.	0.20	\$325	65.00
02/24/2025	EMR	Exchange emails with K. Macuil re uploading relevant documents to a share file folder.	0.20	\$325	65.00
02/24/2025	IG	Exchange emails with staff and K. Macuil to obtain evidence from City of San Luis.	0.20	\$325	65.00
02/26/2025	EMR	Review Notice of Service of Discovery filed by Plaintiff.	0.20	\$325	65.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 03/20/2025

RE: Gethsemani Baptist Church

Invoice Number 335160

ID MMV 12990-0002

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						Fees
Date	Atty	Description	Hours	Rate	Amount	
02/26/2025	EMR	Revise written discovery to include additional information re Plaintiff's foreign and domestic bank accounts, and clarify timeframes for document requests.	0.60	\$325	195.00	
02/26/2025	EMR	Review first set of written discovery served by Plaintiff and assess potential responses or objections to the same.	0.80	\$325	260.00	
02/26/2025	EMR	Review and analysis of Federal Rules of Civil Procedure 33-36 for bases for objections to written discovery to determine those applicable to Plaintiff's first set.	0.40	\$325	130.00	
02/26/2025	IG	Confer with E. Russell re: site inspection.	0.10	\$325	32.50	
02/27/2025	EMR	Review documents uploaded by K. Macuil and A. Gomez to iManage share file.	0.70	\$325	227.50	
02/27/2025	EMR	Assess potential benefits of drafting letter to First Liberty re their comments in the Amicus Brief.	0.20	\$325	65.00	
02/27/2025	EMR	Conduct post-meeting discussion with I. Gonzalez re witness meeting and next steps.	0.30	\$325	97.50	
02/27/2025	EMR	Review statement drafted by Angelica Torres re community's feelings towards Pastor Castro's actions and desire to stymie the food ministry.	0.20	\$325	65.00	
02/27/2025	EMR	Prepare questions for potential witnesses prior to Zoom meeting.	0.90	\$325	292.50	
02/27/2025	EMR	Appear for Zoom meeting with potential witnesses.	1.90	\$325	617.50	
02/27/2025	EMR	Exchange emails with K. Macuil re February 27, 2025, meeting with potential witnesses.	0.20	\$325	65.00	
02/27/2025	IG	Prepare for meeting with potential witnesses and participate in meeting with potential witnesses.	1.90	\$325	617.50	
02/27/2025	IG	Confer with E. Russell re: discovery and trial strategy.	0.30	\$325	97.50	
02/27/2025	IG	Analyze potential issues to address at trial with particular focus on commercial activity's effect on residents of neighborhood.	0.30	\$325	97.50	
02/27/2025	IG	Review M. Castro Facebook page posts and videos re: ministry activity	1.20	\$325	390.00	
02/28/2025	EMR	Review summary of September 24, 2023, Facebook video posted by Pastor Castro re incident involving his truck.	0.20	\$325	65.00	
02/28/2025	EMR	Draft subpoena to Pastor Castro.	1.30	\$325	422.50	
02/28/2025	EMR	Evaluate need for testimony from additional potential witnesses and foreseeable benefits from the same.	0.30	\$325	97.50	
02/28/2025	IG	Draft memo to file re: M. Castro's lengthy Facebook video.	0.40	\$325	130.00	

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 03/20/2025
Invoice Number 335160
Page 5

			Fees		
Date	Atty	Description	Hours	Rate	Amount
02/28/2025	IG	Review Defendant's first set of written discovery.	1.00	\$325	325.00
			Total Fees	32.90	10,692.50

Timekeeper		Hours	Rate	Amount
IG	Gonzalez, Ivan	9.50	325.00	3,087.50
EMR	Russell, Evan M	23.40	325.00	7,605.00
Total Fees				\$10,692.50

Total Current Charges				\$10,692.50
2/24/2025	Previous balance			\$30,405.00
03/04/2025	Payment - Thank you, Check # 111354			-\$30,405.00
Net Balance Forward				\$0.00
Total Balance Due				\$10,692.50

**GAMMAGE
&
BURNHAM**
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COPY

April 10, 2025
 Invoice 336347

ID: MMV 12990-0002
 RE: Gethsemani Baptist Church

For Services Rendered Through: March 31, 2025

Previous Balance	\$10,692.50
Payments	-\$10,692.50
Balance Forward	\$0.00
Current Fees	\$24,577.50
Total Current Charges	\$24,577.50
Total Due	\$24,577.50

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
 Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
 Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
 Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



Zelle

Gammage & Burnham

CLIENT: City of San Luis

RE: Gethsemani Baptist Church

ID MMV 12990-0002

Invoice Date 04/10/2025

Invoice Number 336347

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Fees

Date	Atty	Description	Hours	Rate	Amount
02/03/2025	CCA	Prepare outline of factual and legal issues for discovery and motion practice	1.50	\$450	675.00
02/04/2025	CCA	Outline discovery requests re Church and state and federal tax treatment	1.00	\$450	450.00
02/05/2025	CCA	Call with Glenn Gimbut re discovery	0.30	\$450	135.00
02/05/2025	CCA	Prepare outline of Rule 56 motion	0.80	\$450	360.00
02/07/2025	KB	Gathering evidence of commercial distribution of food supplies at Gethsemani Church	1.80	\$225	405.00
02/11/2025	KB	Correspondence re accumulation of evidence demonstrating commercial distribution of food supplies	0.20	\$225	45.00
02/20/2025	KB	Compiled photographs from Church's Facebook account to demonstrate commercial distribution of food and use of facilities	0.70	\$225	157.50
02/24/2025	CCA	Review discovery requests	1.00	\$450	450.00
02/26/2025	KB	Final review of Church Facebook page for photographs that may be used as evidence demonstrating commercial food distribution	1.20	\$225	270.00
02/28/2025	CCA	Review discovery requests and witness statements	0.30	\$450	135.00
03/03/2025	EMR	Review and incorporate input from K. Macuil on Defendant's written discovery.	0.50	\$325	162.50
03/03/2025	EMR	Review and incorporate changes from I. Gonzalez on Defendant's written discovery requests.	0.50	\$325	162.50
03/03/2025	EMR	Exchange emails with K. Macuil re Defendant's draft written discovery requests.	0.20	\$325	65.00
03/03/2025	IG	Review and modify first set of written discovery and confer with E. Russell re: the same.	0.30	\$325	97.50
03/04/2025	EMR	Review statement of Angelica and Salvador Torres re impact of Church food ministry on their neighborhood.	0.20	\$325	65.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 04/10/2025

RE: Gethsemani Baptist Church

Invoice Number 336347

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
03/04/2025	IG	Review witness statement from witness Ms. Torres.	0.10	\$325	32.50
03/05/2025	EMR	Exchange emails with K. Macuil re updates to Defendant's written discovery.	0.20	\$325	65.00
03/05/2025	IG	Analyze potential edits to written discovery requests and confer with E. Russell regarding the same.	0.30	\$325	97.50
03/06/2025	CCA	Review discovery plans and outline strategies for motion practice	1.00	\$450	450.00
03/06/2025	EMR	Review Defendant's draft Non-Uniform Interrogatories and incorporate changes from I. Gonzalez.	0.50	\$325	162.50
03/06/2025	EMR	Exchange emails with K. Macuil re Plaintiff's written discovery requests.	0.20	\$325	65.00
03/06/2025	IG	Review and modify draft discovery requests.	1.10	\$325	357.50
03/07/2025	EMR	Review Notices of Deposition for J. Torres and A. Gomez filed by Plaintiff.	0.30	\$325	97.50
03/07/2025	IG	Send email to K. Macuil and team re: document production.	0.10	\$325	32.50
03/10/2025	EMR	Review text message files sent by K. Macuil.	0.60	\$325	195.00
03/10/2025	EMR	Exchange emails with K. Macuil re uploading documents to sharefile.	0.20	\$325	65.00
03/10/2025	IG	Review emails and documents provided by client.	0.20	\$325	65.00
03/11/2025	EMR	Review NPR story re Gethsemani Church forwarded by K. Macuil.	0.20	\$325	65.00
03/13/2025	EMR	Conference with K. Macuil and team re written discovery responses.	1.20	\$325	390.00
03/13/2025	EMR	Confer with I. Gonzalez re written discovery response strategy ahead of meeting with team.	0.30	\$325	97.50
03/13/2025	EMR	Conduct in-depth review of written discovery requests from Plaintiff ahead of meeting with team on the same.	0.80	\$325	260.00
03/13/2025	EMR	Telephone call with K. Macuil re truck drivers' illicit use of public park adjacent to Church.	0.40	\$325	130.00
03/13/2025	EMR	Exchange emails with K. Macuil re Plaintiff's Notices of Deposition and links to upload case documents.	0.20	\$325	65.00
03/13/2025	IG	Review Plaintiff's requests for production and interrogatories.	0.50	\$325	162.50
03/13/2025	IG	Meeting with K. Macuil and team re: responding to discovery requests and depositions.	1.20	\$325	390.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 04/10/2025

RE: Gethsemani Baptist Church

Invoice Number 336347

ID MMV 12990-0002

Page 4

Fees

Date	Atty	Description	Hours	Rate	Amount
03/13/2025	IG	Determine next steps re: responding to discovery requests and defending depositions including objections and objecting to depositions locations.	0.20	\$325	65.00
03/13/2025	IG	Confer with E. Russell re: responding to discovery requests.	0.30	\$325	97.50
03/14/2025	EMR	Review and analysis of documents uploaded to sharefile by K. Macuil and team.	1.20	\$325	390.00
03/14/2025	EMR	Exchange emails with K. Macuil re Plaintiff's written discovery requests.	0.20	\$325	65.00
03/14/2025	EMR	Exchange emails with G. Gimbut re his input on Defendant's draft written discovery.	0.20	\$325	65.00
03/14/2025	IG	Review J. Torres and A. Gomez deposition notices and emails from K. Macuil.	0.20	\$325	65.00
03/17/2025	EMR	Review Church's and Pastor's social media pages and create timeline of relevant events.	1.60	\$325	520.00
03/17/2025	EMR	Review Federal Rules of Civil Procedure re the permissibility of deposing the same person twice; once in their individual capacity and once as a 30(b)(6) representative.	0.40	\$325	130.00
03/17/2025	IG	Send emails to E. Russell and K. Macuil re: witness meetings.	0.20	\$325	65.00
03/17/2025	IG	Confer with team re: discovery responses and potential visit to site.	0.20	\$325	65.00
03/18/2025	EMR	Telephone call with K. Macuil re discovery responses.	0.20	\$325	65.00
03/18/2025	IG	Send email to A. Gomez re: witness meeting and review emails from K. Macuil re: Plaintiff's discovery requests.	0.20	\$325	65.00
03/19/2025	EMR	Review emails and statements of Church neighbors forwarded by K. Macuil.	0.40	\$325	130.00
03/19/2025	EMR	Review of call to the public meeting minutes forwarded by K. Macuil.	0.40	\$325	130.00
03/19/2025	IG	Confer with C. Artigue regarding, among other things, discovery strategy.	0.20	\$325	65.00
03/19/2025	IG	Review documents in case file, including pleadings and motions, to assist with discovery strategy and preparing City of San Luis employees for depositions.	1.90	\$325	617.50
03/20/2025	EMR	Exchange emails with R. Gardner re potential call to discuss open discovery questions.	0.20	\$325	65.00

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 04/10/2025
Invoice Number 336347
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Fees

Date	Atty	Description	Hours	Rate	Amount
03/20/2025	IG	Microsoft Teams meeting with K. Macuil and potential witnesses.	2.00	\$325	650.00
03/20/2025	IG	Discussions with IT, T. Roa, and G. Carrillo re: strategy for obtaining electronically stored information from City employees in order to respond to requests for production.	1.10	\$325	357.50
03/20/2025	IG	Analyze Plaintiff's requests for production and interrogatories to determine potential objections and responses.	0.50	\$325	162.50
03/20/2025	IG	Phone call with K. Macuil re: discovery responses and case strategy.	0.80	\$325	260.00
03/20/2025	TR	Conduct research related to collection of text messages and photos, run test for possible software iMazing and provide results to attorney to provide to client.	1.00	\$225	225.00
03/21/2025	EMR	Review and analysis of additional documents uploaded to sharefile by K. Macuil and team.	2.10	\$325	682.50
03/21/2025	EMR	Exchange emails with K. Macuil re rescheduling of J. Torres's and A. Gomez's depositions.	0.20	\$325	65.00
03/21/2025	EMR	Exchange additional emails with K. Macuil re A. Gomez's boss and the proper contact person for scheduling his deposition.	0.20	\$325	65.00
03/21/2025	EMR	Exchange emails with K. Macuil re potential meeting with Osvaldo Rodriguez.	0.20	\$325	65.00
03/21/2025	EMR	Review email sent by K. Macuil re additional witnesses and documents helpful to Defendant's position in this matter.	0.30	\$325	97.50
03/21/2025	EMR	Review email from K. Macuil re potential witness descriptions and document production.	0.20	\$325	65.00
03/21/2025	IG	Review and exchange emails with legal team and City of San Luis employees re: witness interviews and discovery.	0.40	\$325	130.00
03/24/2025	EMR	Review accounts receivable ledgers documenting payments made to the Church forwarded by K. Macuil.	0.40	\$325	130.00
03/24/2025	EMR	Review Development Services Director's timeline of the Church forwarded by K. Macuil.	0.40	\$325	130.00
03/24/2025	EMR	Review of citations issued to Pastor Castro demonstrating a lack of proper permitting, forwarded by K. Macuil.	0.20	\$325	65.00
03/24/2025	EMR	Review email from K. Macuil re discovery questions and details evidencing expansion of the Food Ministry.	0.20	\$325	65.00
03/24/2025	IG	Review and exchange emails with K. Macuil and team re: responses to requests for production.	0.40	\$325	130.00

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 04/10/2025
Invoice Number 336347
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						Fees
Date	Atty	Description	Hours	Rate	Amount	
03/24/2025	IG	Draft list of search terms to use for purposes of response to requests for production.	0.40	\$325	130.00	
03/24/2025	IG	Confer with E. Russell regarding discovery responses and depositions.	0.30	\$325	97.50	
03/24/2025	IG	Review documents provided by K. Macuil in preparation for production.	0.50	\$325	162.50	
03/24/2025	IG	Review emails from K. Macuil re: discovery responses.	0.30	\$325	97.50	
03/25/2025	EMR	Telephone call with R. Gardner of First Liberty Institute re discovery timeline and potential deposition dates.	0.50	\$325	162.50	
03/25/2025	EMR	Exchange multiple emails with R. Gardner re open discovery questions and resolution of the same.	0.40	\$325	130.00	
03/25/2025	EMR	Review Federal Rules of Civil Procedure 12(i) and relevant commentary on the same to assess viability of potential 12(i) motion.	0.90	\$325	292.50	
03/25/2025	IG	Confer with E. Russell regarding, among other things, written discovery and depositions.	0.40	\$325	130.00	
03/26/2025	CCA	Conference re discovery status with co-counsel	1.00	\$450	450.00	
03/26/2025	EMR	Case assessment and strategy development meeting with I. Gonzalez and C. Artigue re written discovery, dispositive motions, and trial strategy.	1.10	\$325	357.50	
03/26/2025	EMR	Review file in preparation for strategy meeting with I. Gonzalez and C. Artigue.	0.20	\$325	65.00	
03/26/2025	EMR	Review Church's and Pastor Castro's Facebook profiles for information related to setting a price.	0.40	\$325	130.00	
03/26/2025	EMR	Review of Fire Inspection Report of Price Center Building where Pastor Castro was storing supplies, forwarded by K. Macuil.	0.40	\$325	130.00	
03/26/2025	EMR	Review emails from K. Macuil re subjects of forthcoming witness interview and Pastor's Facebook posts.	0.20	\$325	65.00	
03/26/2025	EMR	Review Pastor's Facebook profile for instances where he has sold equipment, materials, or other miscellaneous items outside the context of the Food Ministry.	0.70	\$325	227.50	
03/26/2025	IG	Confer with C. Artigue and E. Russell regarding, among other things, discovery, dispositive motions, and general strategy.	1.10	\$325	357.50	
03/26/2025	IG	Send email to K. Macuil re: Pastor Castro's social media activity.	0.20	\$325	65.00	

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 04/10/2025

RE: Gethsemani Baptist Church

Invoice Number 336347

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
03/26/2025	IG	Review relevant rules and pleadings to assist with dispositive motion strategy.	0.80	\$325	260.00
03/27/2025	CCA	Assemble outline of materials on zoning issues and prepare declaration of Jose Guzman	2.00	\$450	900.00
03/27/2025	EMR	Conduct witness interview of Osvaldo Rodriguez.	1.10	\$325	357.50
03/27/2025	EMR	Draft questions in preparation for meeting with Osvaldo Rodriguez.	0.30	\$325	97.50
03/27/2025	EMR	Telephone call with I. Gonzalez re e-discovery service and cost.	0.20	\$325	65.00
03/27/2025	EMR	Draft responses to Plaintiff's Non-Uniform Interrogatories.	3.60	\$325	1,170.00
03/27/2025	EMR	Conduct public record search to determine context of prior lawsuit between J. Torres and the City.	0.60	\$325	195.00
03/27/2025	EMR	Evaluate potential issues for dispositive motions, including ripeness and nonconforming use.	0.90	\$325	292.50
03/27/2025	EMR	Evaluate success of potential jury instruction re the fact that selling food is not a protected religious exercise and whether there's legal support for the same.	0.80	\$325	260.00
03/27/2025	IG	Zoom call with City attorney, E. Russell, and O. Rodriguez.	1.40	\$325	455.00
03/27/2025	IG	Review email from K. Macuil re: discovery and confer with E. Russell regarding the same.	0.30	\$325	97.50
03/28/2025	CCA	Prepare outline of zoning history of NCU issues and declaration of Jose Guzman for eventual use	1.00	\$450	450.00
03/28/2025	EMR	Discussion with T. Roa re information to send First Legal for quote on e-discovery.	0.30	\$325	97.50
03/28/2025	EMR	Draft 30(b)(6) Deposition Notice.	2.30	\$325	747.50
03/28/2025	EMR	Draft Notice of Deposition of Jose Manuel Castro.	0.50	\$325	162.50
03/28/2025	EMR	Draft Responses to Plaintiff's Requests for Production and begin organizing responsive documents.	3.80	\$325	1,235.00
03/28/2025	EMR	Review emails from K. Macuil re warehouse used by Pastor Castro and e-discovery issues.	0.20	\$325	65.00
03/28/2025	EMR	Continue drafting Subpoena Duces Tecum to Pastor Manuel Castro.	0.90	\$325	292.50
03/28/2025	IG	Review and modify notice of appearance.	0.10	\$325	32.50
03/28/2025	IG	Send emails to K. Macuil and team re: discovery and witness interviews.	0.20	\$325	65.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 04/10/2025

RE: Gethsemani Baptist Church

Invoice Number 336347

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
03/28/2025	TR	Review email from client with details related to email data; participate in multiple communications with First Legal regarding quote for discovery database for review and production of client emails.	0.90	\$225	202.50
03/31/2025	CCA	Prepare timeline and declaration of Jose Guzman	0.90	\$450	405.00
03/31/2025	CCA	Review new Ninth Circuit opinion	0.40	\$450	180.00
03/31/2025	IG	Review case management order to determine upcoming deadlines and develop strategy.	0.10	\$325	32.50
03/31/2025	IG	Confer with E. Russell re: depositions and subpoena for documents to Pastor Castro.	0.20	\$325	65.00
03/31/2025	IG	Review and modify depositions notices for Pastor Castro and 30(b)(6) designee(s).	1.40	\$325	455.00
Total Fees			73.10		24,577.50

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	11.20	450.00	5,040.00
KB	Brown, Kevin	3.90	225.00	877.50
IG	Gonzalez, Ivan	20.10	325.00	6,532.50
TR	Roa, Traci	1.90	225.00	427.50
EMR	Russell, Evan M	36.00	325.00	11,700.00
Total Fees				\$24,577.50

Total Current Charges			\$24,577.50
3/20/2025	Previous balance		\$10,692.50
04/01/2025	Payment - Thank you, Check # 111622		-\$10,692.50
Net Balance Forward			\$0.00
Total Balance Due			\$24,577.50

COPY

City of San Luis
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TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

May 21, 2025

Invoice 337403

ID: MMV 12990-0002
RE: Gethsemani Baptist Church

For Services Rendered Through: April 30, 2025

Previous Balance	\$24,577.50
Payments	-\$24,577.50
Balance Forward	\$0.00
Current Fees	\$63,737.50
Discount	-\$33,737.50
Total Current Charges	\$30,000.00
Total Due	\$30,000.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 05/21/2025
Invoice Number 337403
Page 2

				Fees		
Date	Atty	Description	Hours	Rate	Amount	
04/01/2025	CCA	Prepare outline of issues on nonconforming use issue	0.50	\$450	225.00	
04/01/2025	CCA	Review new Ninth Circuit decision on substantial burden	0.60	\$450	270.00	
04/01/2025	EMR	Review and analysis of new Ninth Circuit decision which may impact strategy decisions in this matter.	0.30	\$325	97.50	
04/01/2025	EMR	Exchange emails with K. Macuil re changes to written discovery drafts.	0.20	\$325	65.00	
04/01/2025	EMR	Review 30(b)(6) Deposition Notice circulated by Plaintiff's counsel.	0.20	\$325	65.00	
04/01/2025	EMR	Review finalized Notices of Deposition before sending to opposing counsel.	0.20	\$325	65.00	
04/01/2025	EMR	Exchange emails with K. Macuil re draft Notice of 30(b)(6) Deposition of the Church.	0.20	\$325	65.00	
04/01/2025	EMR	Exchange emails with K. Macuil re whether scheduled April 3, witness interview is necessary.	0.20	\$325	65.00	
04/01/2025	EMR	Exchange emails with R. Gardner re service of deposition notices.	0.20	\$325	65.00	
04/01/2025	IG	Confer with E. Russell re: depositions of Pastor Castro and Church.	0.30	\$325	97.50	
04/02/2025	CCA	Prepare narrative on conditional use issues, zoning history, and nonconforming use	1.00	\$450	450.00	
04/02/2025	EMR	Exchange emails with J. Torres re availability for her upcoming deposition.	0.20	\$325	65.00	
04/02/2025	EMR	Exchange emails with K. Macuil re her team's deposition availability.	0.20	\$325	65.00	
04/02/2025	IG	Confer with C. Artigue regarding, among other things, discovery and trial strategy.	0.40	\$325	130.00	

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 05/21/2025

RE: Gethsemani Baptist Church

Invoice Number 337403

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
04/02/2025	TR	Communication with First Legal regarding e-discovery platform Relativity, quote and processing data, up to 100gb's of data.	0.40	\$225	90.00
04/03/2025	CCA	Prepare strategy for trial schedule	0.40	\$450	180.00
04/03/2025	CCA	Revise timeline re zoning and NCU issues	0.40	\$450	180.00
04/03/2025	EMR	Assess need to move trial date to early 2026.	0.20	\$325	65.00
04/03/2025	EMR	Evaluate deposition schedule and sequencing for forthcoming May depositions of City employees.	0.20	\$325	65.00
04/03/2025	EMR	Exchange multiple emails with K. Macuil re forthcoming City employee depositions.	0.30	\$325	97.50
04/03/2025	EMR	Draft objections to Plaintiff's Written Discovery.	2.10	\$325	682.50
04/03/2025	IG	Confer with team re: using Relativity platform for purposes of reviewing emails provided by City of San Luis.	0.20	\$325	65.00
04/03/2025	IG	Prepare for and participate in meeting with City employee D. Zepeda and city attorney.	0.90	\$325	292.50
04/03/2025	IG	Review correspondence from K. Macuil and opposing counsel re: depositions and determine dates for rescheduling depositions of J. Torres and A. Gomez.	0.30	\$325	97.50
04/03/2025	TR	Communicate with First Legal regarding quote for e-Discovery services in this matter.	0.30	\$225	67.50
04/04/2025	CCA	Prepare outline of motion for summary judgment and insert cases	2.20	\$450	990.00
04/04/2025	EMR	Draft email to K. Macuil re outline of costs for conducting e-discovery using First Legal.	0.50	\$325	162.50
04/04/2025	EMR	Exchange emails with K. Macuil re engaging First Legal to conduct e-discovery.	0.20	\$325	65.00
04/04/2025	EMR	Draft email to R. Gardner re scheduling of forthcoming City employee depositions.	0.20	\$325	65.00
04/04/2025	EMR	Exchange multiple emails with K. Macuil re retention of First Legal for assistance with e-discovery.	0.30	\$325	97.50
04/04/2025	EMR	Continue to draft Defendant's Responses to Plaintiff's Written Discovery.	0.90	\$325	292.50
04/04/2025	IG	Email Plaintiff's counsel re: deposition scheduling.	0.20	\$325	65.00
04/04/2025	IG	Begin reviewing documents provided by client in preparation for disclosing in response to requests for production.	0.40	\$325	130.00
04/07/2025	CCA	Prepare motion for summary judgment on RLUIPA claim	1.70	\$450	765.00

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04/07/2025	EMR	Review proposed Service Agreement between City and First Legal re e-discovery.	0.30	\$325	97.50		
04/07/2025	EMR	Discussion with I. Gonzalez and C. Artigue re strategy for September trial and forthcoming motion practice.	0.50	\$325	162.50		
04/07/2025	IG	Confer with T. Roa and E. Russell re: discovery responses and e-discovery issues.	0.50	\$325	162.50		
04/07/2025	IG	Confer with C. Artigue and E. Russell re: litigation strategy and discovery.	0.50	\$325	162.50		
04/07/2025	IG	Determine potential issues to address in supplemental disclosure statement.	0.30	\$325	97.50		
04/07/2025	IG	Microsoft Teams meeting with City of San Luis staff and First Legal re: e-discovery.	0.70	\$325	227.50		
04/07/2025	TR	Participate in multiple communications with First Legal and the City of San Luis regarding collection, processing and production of data.	1.40	\$225	315.00		
04/08/2025	CCA	Add new cases on commercial activity to MSJ	1.00	\$450	450.00		
04/08/2025	CCA	Prepare Guzman declaration	0.50	\$450	225.00		
04/08/2025	EMR	Review notes from K. Macuil re proper 30(b)(6) City deponents by topic.	0.20	\$325	65.00		
04/08/2025	EMR	Review prior engagements with First Legal to determine whether any material changes were made to agreement between City and First Legal.	0.20	\$325	65.00		
04/08/2025	EMR	Review choice of law provisions to include in agreement with First Legal and assess benefits of Arizona versus California.	0.20	\$325	65.00		
04/08/2025	EMR	Continue to draft Defendant's Responses to Plaintiff's Written Discovery.	1.30	\$325	422.50		
04/08/2025	IG	Send email to R. Gardner re: deposition scheduling and related issues.	0.30	\$325	97.50		
04/08/2025	IG	Send email to B. Olsen re: retaining Spanish interpreters in Yuma County.	0.20	\$325	65.00		
04/08/2025	IG	Exchange emails with E. Russell and team re: document review.	0.40	\$325	130.00		
04/08/2025	IG	Send emails to K. Macuil and her legal team re: City's 30(b)(6) witness subpoena designees.	0.40	\$325	130.00		
04/08/2025	IG	Send emails to K. Macuil and her team re: retaining First Legal to assist with e-discovery.	0.20	\$325	65.00		

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04/08/2025	IG	Confer with E. Russel and T. Roa regarding, among other things, document review and responses to Plaintiff's discovery requests.	0.50	\$325	162.50
04/08/2025	IG	Review documents provided by client to assist with discovery responses.	0.80	\$325	260.00
04/08/2025	IG	Phone call with K. Macuil and her team regarding, among other things, responding to Plaintiff's requests for production.	0.50	\$325	162.50
04/08/2025	TR	Begin to download and analyze the first 5 folders of data received from the client (approx. 19gb's of data), review for responsiveness to discovery requests and create summary of the contents.	6.40	\$225	1,440.00
04/09/2025	CCA	Research re history of nonprofit law on religious and commercial activities and incorporation into RLUIPA	1.00	\$450	450.00
04/09/2025	EMR	Review revised agreement between First Legal and City.	0.20	\$325	65.00
04/09/2025	EMR	Review renewed listed of potential 30(b)(6) City deponents sent by K. Macuil.	0.20	\$325	65.00
04/09/2025	EMR	Exchange emails with R. Rivera of First Legal re organization of files in Relativity.	0.20	\$325	65.00
04/09/2025	EMR	Review Pastor Castro's Facebook video describing the expansion of his Food Ministry over the years.	0.50	\$325	162.50
04/09/2025	EMR	Finalize draft of Defendant's Responses to Plaintiff's Non-Uniform Interrogatories.	0.90	\$325	292.50
04/09/2025	EMR	Finalize Draft Response to Plaintiff's Requests for Production.	2.40	\$325	780.00
04/09/2025	IG	Review and modify responses to Plaintiff's first set of interrogatories and requests for production.	2.10	\$325	682.50
04/09/2025	IG	Send emails to team and K. Macuil re: document production.	0.30	\$325	97.50
04/09/2025	IG	Confer with T. Roa re: document production strategy.	0.20	\$325	65.00
04/09/2025	IG	Confer with E. Russell re: edits to responses to Plaintiff's interrogatories and requests for production.	0.30	\$325	97.50
04/09/2025	TR	Work with First Legal to load relevant data from first 5 folders into the platforms for review.	0.60	\$225	135.00
04/09/2025	TR	Continue to analyze the first set of data received from the client that has been loaded into Relativity for responsive and create issue tags to match each RFP number.	5.20	\$225	1,170.00
04/10/2025	CCA	Review interrogatory answers	0.80	\$450	360.00

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Date	Atty	Description	Hours	Rate	Amount
04/10/2025	CCA	Prepare Guzman timeline on nonconforming use issues	0.80	\$450	360.00
04/10/2025	EMR	Review draft Interrogatory Verification of J. Torres before finalizing the same.	0.20	\$325	65.00
04/10/2025	EMR	Revise Defendant's Response to Plaintiff's First Set of Interrogatories to incorporate changes from C. C. Artigue.	0.80	\$325	260.00
04/10/2025	EMR	Review and analysis of documents produced by the City to evaluate whether they should be disclosed in Defendant's Response to Plaintiff's First Set of Discovery requests.	1.30	\$325	422.50
04/10/2025	EMR	Continue to review documents potentially responsive to Plaintiff's First Set of Written Discovery.	0.80	\$325	260.00
04/10/2025	IG	Phone call with K. Macuil, J. Torres, and C. Artigue re: trial continuance, discovery, and general strategy.	0.60	\$325	195.00
04/10/2025	IG	Review and modify responses to Plaintiff's first set of interrogatories.	2.60	\$325	845.00
04/10/2025	IG	Review and modify J. Torres verification to responses to Plaintiff's first set of interrogatories.	0.20	\$325	65.00
04/10/2025	IG	Send emails to R. Gardner re: discovery and scheduling meeting.	0.20	\$325	65.00
04/10/2025	IG	Send email to K. Macuil re: responses to Plaintiff's first set of interrogatories.	0.20	\$325	65.00
04/10/2025	IG	Confer with E. Russell and T. Roa re: discovery responses and document review.	0.50	\$325	162.50
04/10/2025	IG	Review thousands of pages of documents provided by client in preparation for disclosure.	2.90	\$325	942.50
04/10/2025	IG	Confer with C. Artigue re: trial continuance and discovery.	0.20	\$325	65.00
04/10/2025	TR	Continue to analyze the first set of data received from the client that has been loaded into Relativity for responsive to discovery requests.	4.60	\$225	1,035.00
04/11/2025	EMR	Telephone call with Plaintiff's counsel re discovery and potential continuance of trial.	0.50	\$325	162.50
04/11/2025	EMR	Review numerous emails from R. Rivera of First Legal re format of production.	0.20	\$325	65.00
04/11/2025	EMR	Review document outlining all relevant citations issued by City police and assess responsiveness to Plaintiff's written discovery.	0.40	\$325	130.00
04/11/2025	EMR	Review draft Declaration of J. Guzman.	0.30	\$325	97.50

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Date	Atty	Description	Hours	Rate	Amount
04/11/2025	EMR	Review Defendant's finalized discovery responses before serving the same.	0.60	\$325	195.00
04/11/2025	EMR	Review documents tagged for disclosure and ensure they're tagged responsive to the correct requests.	0.70	\$325	227.50
04/11/2025	EMR	Finalize Defendant's responses to Plaintiff's written discovery.	0.70	\$325	227.50
04/11/2025	EMR	Review Yuma Food Bank agreement with City circulated by K. Macuil.	0.20	\$325	65.00
04/11/2025	EMR	Exchange emails with K. Macuil re J. Torres's signed verification.	0.20	\$325	65.00
04/11/2025	EMR	Update document tracking spreadsheet to reflect responsiveness of various documents to be produced by City.	0.30	\$325	97.50
04/11/2025	IG	Review documents provided by client requiring redactions and send email to team re: the same.	0.30	\$325	97.50
04/11/2025	IG	Send emails to R. Gardner re: today's meeting.	0.20	\$325	65.00
04/11/2025	IG	Prepare for today's phone call with Plaintiff's counsel by reviewing court orders and email correspondence and confer with E. Russell.	0.40	\$325	130.00
04/11/2025	IG	Microsoft Teams meeting with Plaintiff's counsel and E. Russell re: trial continuance and discovery.	0.50	\$325	162.50
04/11/2025	IG	Review and modify draft interrogatory responses.	1.50	\$325	487.50
04/11/2025	IG	Review and modify draft request for production responses.	1.50	\$325	487.50
04/11/2025	IG	Finalize review of thousands of pages of documents in preparation for production.	1.60	\$325	520.00
04/11/2025	IG	Exchanges emails with Gammage & Burnham team and confer with the same in preparation for finalizing document production.	0.40	\$325	130.00
04/11/2025	TR	Begin review and analyzing data received in Folder 2 from the client, this data is in the ECA platform and consists of 76 zip files that were collected during a request for public records, run key word search terms and create list of terms to eliminate data that is not needed..	2.10	\$225	472.50
04/11/2025	TR	Continue to tag for responsiveness, redact where needed and create report to attached to RFP responses.	3.90	\$225	877.50
04/14/2025	EMR	Draft Supplemental Disclosure Statement to include witnesses interviewed to date.	1.10	\$325	357.50
04/14/2025	EMR	Draft Notice of Service of Responses to Written Discovery.	0.30	\$325	97.50

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04/14/2025	EMR	Draft Notice of Service of Deposition Notices on Plaintiff.	0.30	\$325	97.50		
04/14/2025	EMR	Draft Notice of Service of First Supplemental Disclosure Statement.	0.30	\$325	97.50		
04/14/2025	IG	Confer with team regarding, among other things, upcoming document production, trial strategy, and witness interviews.	0.30	\$325	97.50		
04/14/2025	IG	Exchange emails with First Legal and F. Corona re: document production and Relativity.	0.30	\$325	97.50		
04/14/2025	IG	Review and modify draft list of search terms re: upcoming document production.	0.40	\$325	130.00		
04/14/2025	IG	Review and modify notice of service of discovery responses.	0.20	\$325	65.00		
04/14/2025	IG	Send emails to K. Macuil re: supplemental disclosure statement.	0.40	\$325	130.00		
04/14/2025	IG	Review and modify Defendant's draft supplemental disclosure statement and review Plaintiff's initial disclosure statement.	0.50	\$325	162.50		
04/14/2025	IG	Review communications between City of San Luis and First Legal.	0.10	\$325	32.50		
04/15/2025	CCA	Review emails re witness threats	0.30	\$450	135.00		
04/15/2025	CCA	Prepare MSJ	1.00	\$450	450.00		
04/15/2025	EMR	Review emails from K. Macuil re potential harassment of Church neighbors by Church employees.	0.20	\$325	65.00		
04/15/2025	EMR	Discussion with I. Gonzalez re strategy moving forward with disclosure of email records.	0.20	\$325	65.00		
04/15/2025	IG	Call with K. Macuil regarding, among other things, neighbor harassment issues, discovery responses, and general background.	1.10	\$325	357.50		
04/15/2025	IG	Send email to C. Artigue and E. Russell re: alleged harassment of Church's neighbors and potential next steps.	0.20	\$325	65.00		
04/15/2025	IG	Begin drafting motion to continue trial and related declarations.	1.70	\$325	552.50		
04/15/2025	TR	Evaluate quote from First Legal and participate in negotiations with First Legal regarding the same.	0.60	\$225	135.00		
04/15/2025	TR	Work with First Legal to identify the list of custodians in Folder 2.	0.80	\$225	180.00		
04/16/2025	IG	Review and modify Motion to Continue Trial and I. Gonzalez and C. Artigue declarations.	1.10	\$325	357.50		

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04/16/2025	IG	Confer with C. Artigue regarding, among other things, alleged harassment, trial continuance, and discovery.	0.40	\$325	130.00
04/16/2025	IG	Send email to opposing counsel re: trial continuance.	0.40	\$325	130.00
04/16/2025	IG	Begin preparing litigation budget.	0.80	\$325	260.00
04/16/2025	IG	Review Plaintiff's document production to determine next round of written discovery.	0.70	\$325	227.50
04/16/2025	TR	Work with First Legal to determine the stats related to how much data is in both the ECA platform and the review platform.	0.60	\$225	135.00
04/17/2025	EMR	Review draft Stipulated Motion to Continue Trial.	0.30	\$325	97.50
04/17/2025	EMR	Review finalized list of search terms for e-discovery.	0.20	\$325	65.00
04/17/2025	EMR	Review additional details from K. Macuil re potential harassment of Church neighbors by Church employees.	0.20	\$325	65.00
04/17/2025	EMR	Revise list of search terms to ensure responsive documents will be flagged during e-discovery.	0.40	\$325	130.00
04/17/2025	IG	Phone call with C. Artigue regarding, among other things, trial continuance and alleged harassment.	0.30	\$325	97.50
04/17/2025	IG	Continue preparing litigation budget.	0.50	\$325	162.50
04/17/2025	IG	Send emails to R. Gardner re: trial continuance.	0.60	\$325	195.00
04/17/2025	IG	Review and modify motion for trial continuance and declarations of I. Gonzalez and C. Artigue.	1.50	\$325	487.50
04/17/2025	IG	Review and modify document production search terms and confer with T. Roa re: the same.	0.40	\$325	130.00
04/17/2025	IG	Send email to C. Artigue and E. Russell re: Church's alleged harassment of neighbors.	0.20	\$325	65.00
04/17/2025	IG	Phone call with K. Macuil re: alleged harassment and trial continuance.	0.40	\$325	130.00
04/17/2025	TR	Begin to analyze the new data (all email from the client) to create list of keywords or search terms.	1.40	\$225	315.00
04/18/2025	CCA	Sign declaration and review motion to continue trial	0.30	\$450	135.00
04/18/2025	CCA	Legal research re witness harassment and admissibility of admission by conduct	0.50	\$450	225.00
04/18/2025	EMR	Review draft Order granting Motion to Continue Trial.	0.20	\$325	65.00
04/18/2025	EMR	Review and assess impact of lawsuit against City of Tempe re permit requirement to feed homeless people in a public park.	0.30	\$325	97.50

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Date	Atty	Description	Hours	Rate	Amount
04/18/2025	IG	Send emails to opposing counsel re: motion to continue trial.	0.20	\$325	65.00
04/18/2025	IG	Phone calls with R. Gardner re: motion to continue trial.	0.20	\$325	65.00
04/18/2025	IG	Review and modify motion to continue trial, I. Gonzalez declaration, and proposed order.	1.10	\$325	357.50
04/18/2025	IG	Send email to First Legal re: document production.	0.10	\$325	32.50
04/18/2025	RKM	Review case background and legal issues.	4.90	\$450	2,205.00
04/20/2025	EMR	Review email sent by City Police Chief to City Police Department re ongoing lawsuit.	0.20	\$325	65.00
04/21/2025	EMR	Review Police Report re possible harassment of Church neighbors by Church employees.	0.20	\$325	65.00
04/21/2025	EMR	Review and analysis of Plaintiff's Responses to Defendant's First Set of Written Discovery.	1.40	\$325	455.00
04/21/2025	EMR	Review documents produced by Plaintiff as responsive to Defendant's First Set of Requests for Production.	0.80	\$325	260.00
04/21/2025	EMR	Discussion re strategy moving forward with anticipated increase in discovery review.	0.50	\$325	162.50
04/21/2025	IG	Confer with team re: reviewing and producing voluminous documents uploaded to Relativity.	0.20	\$325	65.00
04/21/2025	IG	Confer with T. Roa regarding, among other things, search terms to use for upcoming document production.	0.30	\$325	97.50
04/21/2025	IG	Send emails to team re: document review and alleged harassment incident.	0.30	\$325	97.50
04/21/2025	IG	Send emails to K. Macuil re: alleged harassment incident.	0.20	\$325	65.00
04/21/2025	IG	Review and modify list of search terms re: document production.	0.50	\$325	162.50
04/21/2025	IG	Confer with T. Roa re: document review and production.	0.40	\$325	130.00
04/21/2025	IG	Confer with R. Mahrle regarding, among other things, discovery strategy.	0.50	\$325	162.50
04/21/2025	IG	Begin reviewing documents provided by client in preparation for document production.	1.00	\$325	325.00
04/21/2025	IG	Begin reviewing Plaintiff's discovery responses.	0.50	\$325	162.50
04/21/2025	RKM	Continue review of background materials. Outline issues. Strategy conference with C. C. Artigue.	2.60	\$450	1,170.00
04/21/2025	TR	Continue to evaluate data in the ECA platform (1.6 million documents); evaluate key search term list.	1.30	\$225	292.50

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04/22/2025	EMR	Review Judge Snow's Order setting Scheduling Conference.	0.20	\$325	65.00
04/22/2025	IG	Review and modify litigation budget.	0.20	\$325	65.00
04/22/2025	IG	Confer with T. Roa re: next steps as it pertains to document review.	0.30	\$325	97.50
04/22/2025	IG	Send email to J. Torres re: deposition.	0.20	\$325	65.00
04/22/2025	IG	Review documents in case file and analyze next steps as it pertains to scheduling depositions and potential witnesses to depose.	0.50	\$325	162.50
04/22/2025	IG	Confer with R. Mahrle re: litigation strategy.	0.30	\$325	97.50
04/22/2025	IG	Review documents in preparation for disclosure.	0.90	\$325	292.50
04/22/2025	RKM	Consult on discovery issues.	0.50	\$450	225.00
04/22/2025	TR	Work with First Legal regarding search term report, results from the ECA platform and evaluate if the results included the proper custodians (note: First Legal had a corrupt file from Documents Folder 2 that they are resolving and will update results).	1.30	\$225	292.50
04/23/2025	EMR	Review Internal Revenue Service website for 501(c)(3) filings by Plaintiff.	0.40	\$325	130.00
04/23/2025	EMR	Discussion with I. Gonzalez re Plaintiff's discovery responses and their impact on case strategy moving forward.	0.30	\$325	97.50
04/23/2025	IG	Confer with R. Mahrle regarding, among other things, discovery strategy and document review.	0.30	\$325	97.50
04/23/2025	IG	Confer with E. Russell and T. Roa re: document review.	0.40	\$325	130.00
04/23/2025	IG	Review Church's responses to City's discovery requests and determine potential issues to address.	1.10	\$325	357.50
04/23/2025	IG	Send emails to K. Macuil and J. Torres.	0.30	\$325	97.50
04/23/2025	IG	Review hundreds of emails, for responsiveness and privilege, in preparation for production.	3.20	\$325	1,040.00
04/23/2025	IG	Review and modify litigation budget.	0.50	\$325	162.50
04/23/2025	IG	Review and modify litigation update to City Council and Acting City Manager and send to K. Macuil.	0.40	\$325	130.00
04/23/2025	RKM	Work on budget. Continue review of background of case. Start review of plaintiff's discovery responses.	1.40	\$450	630.00

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04/23/2025	TR	Continue to work with First Legal regarding search terms for data and layout of platform for review, work within Relativity to review batches of documents and run various queries related to discovery requests.	1.40	\$225	315.00
04/24/2025	CCA	Prepare for and call with City Manager and City Attorney re status and budget	1.00	\$450	450.00
04/24/2025	IG	Phone calls with potential witnesses re: case status and disclosure statement.	0.60	\$325	195.00
04/24/2025	IG	Prepare plan for deposition scheduling in May.	0.50	\$325	162.50
04/24/2025	IG	Begin research re: legislative privilege in preparation for objecting to deposition of Mayor Riedel.	0.50	\$325	162.50
04/24/2025	IG	Review hundreds of emails and documents, for responsiveness and privilege, in preparation for production.	2.60	\$325	845.00
04/24/2025	IG	Phone call with K. Macuil, J. Torres, R. Mahrle, and C. Artigue.	0.80	\$325	260.00
04/24/2025	RKM	Continue review of the Church's discovery responses. Prep for meeting with City Attorney. Conference call with City Attorney.	1.90	\$450	855.00
04/25/2025	EMR	Review and mark responsive email documents for forthcoming disclosure.	1.90	\$325	617.50
04/25/2025	EMR	Discussion with I. Gonzalez re process for evaluating potentially relevant email documents from City.	0.20	\$325	65.00
04/25/2025	IG	Send email to opposing counsel re: depositions.	0.40	\$325	130.00
04/25/2025	IG	Confer with E. Russell re: document review and depositions.	0.20	\$325	65.00
04/25/2025	IG	Review law re: objecting to subpoena based on privilege.	0.40	\$325	130.00
04/25/2025	IG	Send emails to K. Macuil re: meeting with Torreses.	0.20	\$325	65.00
04/25/2025	IG	Phone calls with witnesses O. Padilla and G. Castillo.	0.40	\$325	130.00
04/25/2025	IG	Draft letter objecting to Mayor Riedel's deposition.	1.80	\$325	585.00
04/25/2025	IG	Continue reviewing documents in preparation for disclosure.	2.50	\$325	812.50
04/25/2025	RKM	Revise objection letter. Confer with I. Gonzalez re document production issues.	0.30	\$450	135.00
04/26/2025	IG	Review hundreds of documents in preparation for disclosure.	4.20	\$325	1,365.00
04/27/2025	EMR	Continue to review and mark responsive email documents for forthcoming disclosure.	3.90	\$325	1,267.50

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04/27/2025	IG	Review hundreds of documents in preparation for disclosure.	3.30	\$325	1,072.50
04/28/2025	CCA	Prepare budget and email client re same	0.70	\$450	315.00
04/28/2025	EMR	Continue to review and mark responsive email documents for forthcoming disclosure.	2.50	\$325	812.50
04/28/2025	EMR	Discussion with I. Gonzalez re continued review of potentially responsive email documents from the City.	0.20	\$325	65.00
04/28/2025	EMR	Exchange multiple emails with R. Rivera of First Legal re document retention following review.	0.30	\$325	97.50
04/28/2025	IG	Continue reviewing documents in preparation for disclosure.	1.40	\$325	455.00
04/28/2025	IG	Review case file to determine next round of written discovery requests.	0.50	\$325	162.50
04/29/2025	CCA	Prepare letter to First Liberty re objections to discovery requests	1.50	\$450	675.00
04/29/2025	EMR	Review draft letter to R. Gardner re Plaintiff's deficient discovery responses.	0.20	\$325	65.00
04/29/2025	EMR	Continue to review and mark responsive email documents for forthcoming disclosure.	2.10	\$325	682.50
04/29/2025	EMR	Revise Defendant's Second Set of Written Discovery.	0.50	\$325	162.50
04/29/2025	IG	Exchange emails with team re: discovery dispute and settlement.	0.30	\$325	97.50
04/29/2025	IG	Phone call with R. Gardner re: discovery and settlement.	0.40	\$325	130.00
04/29/2025	IG	Draft second set of interrogatories and requests for production.	1.50	\$325	487.50
04/29/2025	IG	Review and modify letter to R. Gardner re: religious privilege objections to Defendant's discovery requests.	0.50	\$325	162.50
04/29/2025	IG	Review and modify second set of interrogatories and requests for production.	0.40	\$325	130.00
04/29/2025	IG	Review hundreds of documents in preparation for production.	1.40	\$325	455.00
04/29/2025	IG	Send emails to R. Gardner re: discovery and scheduling call.	0.30	\$325	97.50
04/29/2025	RKM	Review draft of letter related to discovery issues.	0.10	\$450	45.00
04/30/2025	CCA	Prepare MSJ on equal terms argument of RLUIPA	1.40	\$450	630.00
04/30/2025	EMR	Continue to review and mark responsive email documents for forthcoming disclosure.	6.50	\$325	2,112.50

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 05/21/2025
 Invoice Number 337403
 Page 14

Fees					
Date	Atty	Description	Hours	Rate	Amount
04/30/2025	IG	Review and modify supplemental disclosure statement.	0.80	\$325	260.00
04/30/2025	IG	Review and modify notice of service of discovery and disclosure statement.	0.30	\$325	97.50
04/30/2025	IG	Confer with R. Mahrle re: discovery and settlement.	0.20	\$325	65.00
04/30/2025	IG	Confer with team re: document review.	0.30	\$325	97.50
04/30/2025	IG	Review thousands of documents in preparation for disclosure.	4.30	\$325	1,397.50
04/30/2025	IG	Send emails to K. Macuil re: depositions and settlement.	0.30	\$325	97.50
04/30/2025	RKM	Finish review of initial discovery responses from the church. Continue evaluation of defenses, legal responses.	2.00	\$450	900.00
04/30/2025	TR	Run query related to documents marked responsive in preparation for supplemental disclosure statement.	0.30	\$225	67.50
04/30/2025	TR	Communicate with First Legal regarding archiving data.	0.30	\$225	67.50

Total Fees 194.20 63,737.50

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	17.60	450.00	7,920.00
IG	Gonzalez, Ivan	82.60	325.00	26,845.00
RKM	Mahrle, Richard K.	13.70	450.00	6,165.00
TR	Roa, Traci	32.90	225.00	7,402.50
EMR	Russell, Evan M	47.40	325.00	15,405.00
Total Fees				\$63,737.50

Discount - \$33,737.50

Total Current Charges \$30,000.00

4/10/2025 Previous balance \$24,577.50

04/25/2025 Payment - Thank you, Check # 111821 -\$24,577.50

Net Balance Forward \$0.00

Total Balance Due	\$30,000.00
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**GAMMAGE
&
BURNHAM**

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FEDERAL TAX ID 86-0450146

June 30, 2025

Invoice 338446

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

COPY

For Services Rendered Through: May 31, 2025

Previous Balance	\$30,000.00
Payments	-\$30,000.00
Balance Forward	\$0.00
Current Fees	\$36,957.50
Current Expenses	\$3,715.05
Discount	-\$10,672.55
Total Current Charges	\$30,000.00
Total Due	\$30,000.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



Zelle®

Gammage & Burnham

CLIENT: City of San Luis

RE: Gethsemani Baptist Church

ID MMV 12990-0002

Invoice Date 06/30/2025

Invoice Number 338446

Page 2

Fees					
Date	Atty	Description	Hours	Rate	Amount
05/01/2025	IG	Confer with R. Mahrle re: settlement and general litigation strategy.	0.40	\$325	130.00
05/01/2025	IG	Zoom meeting with K. Macuil and Torreses re: recent incident involving church and nuisance issue.	1.30	\$325	422.50
05/01/2025	IG	Determine potential matters to address in supplemental disclosure statement including lay witnesses.	0.50	\$325	162.50
05/01/2025	IG	Review hundreds of documents provided by client in preparation for disclosure.	3.30	\$325	1,072.50
05/01/2025	IG	Send email to K. Macuil re: settlement.	0.20	\$325	65.00
05/01/2025	RKM	Continue evaluation of defenses. Consult with I. Gonzalez.	1.50	\$450	675.00
05/02/2025	CCA	Prepare motion for summary judgment on equal terms claim	1.40	\$450	630.00
05/02/2025	CCA	Review new cases on RLUIPA	0.80	\$450	360.00
05/02/2025	IG	Confer with R. Mahrle re: scheduling conference and litigation strategy.	0.30	\$325	97.50
05/02/2025	IG	Participate in scheduling conference.	0.30	\$325	97.50
05/02/2025	IG	Send email to K. Macuil re: scheduling conference.	0.10	\$325	32.50
05/02/2025	IG	Confer with C. Artigue re: scheduling conference and discovery.	0.20	\$325	65.00
05/02/2025	IG	Send emails to R. Gardner re: discovery.	0.30	\$325	97.50
05/02/2025	IG	Confer with E. Russell and T. Roa re: document production.	0.50	\$325	162.50
05/02/2025	IG	Exchange emails with E. Russell and T. Roa re: document production.	0.40	\$325	130.00
05/02/2025	IG	Phone call with K. Macuil re: settlement and general strategy.	0.70	\$325	227.50
05/02/2025	IG	Review hundreds of document in preparation for disclosure.	2.30	\$325	747.50

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 06/30/2025

RE: Gethsemani Baptist Church

Invoice Number 338446

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
05/02/2025	RKM	Prep for conference with Court. Continue evaluation of defenses. Trial setting conference.	4.00	\$450	1,800.00
05/04/2025	IG	Review thousands of documents in preparation for disclosure.	5.50	\$325	1,787.50
05/04/2025	RKM	Emails from client re burglary and DOJ issues. Continual evaluation of legal basis for defenses.	2.00	\$450	900.00
05/05/2025	IG	Review hundreds of documents in preparation for disclosure.	1.20	\$325	390.00
05/05/2025	IG	Confer with R. Mahrle re: litigation strategy and settlement.	0.40	\$325	130.00
05/05/2025	IG	Send email to K. Macuil re: settlement.	0.20	\$325	65.00
05/05/2025	RKM	Review court's order setting the trial. Strategy conference.	0.70	\$450	315.00
05/05/2025	TR	Make second pass review for responsiveness, privilege and redactions for batches 2, 4, 5, 12, and 10 approx. 5,000 documents, and work with First Legal to finalize Prod002.	4.80	\$225	1,080.00
05/06/2025	IG	Send emails to K. Macuil re: settlement and discovery.	0.30	\$325	97.50
05/06/2025	IG	Prepare second supplemental disclosure statement.	0.70	\$325	227.50
05/06/2025	IG	Confer with team regarding documents to be produced today and review documents.	0.70	\$325	227.50
05/06/2025	IG	Send email to opposing counsel re: discovery.	0.20	\$325	65.00
05/06/2025	RKM	Confer with I. Gonzalez re witness disclosure.	0.10	\$450	45.00
05/06/2025	TR	Review data and run search terms for specific documents requested by the team.	0.80	\$225	180.00
05/06/2025	TR	Finalize review of second set of documents for inconsistencies in tagging and prepare for Prod002 to go out today.	1.60	\$225	360.00
05/07/2025	IG	Phone call with R. Gardner.	0.40	\$325	130.00
05/07/2025	IG	Review Plaintiff's discovery responses and objections to determine next steps in discovery.	1.10	\$325	357.50
05/07/2025	IG	Review RLUIPA law to assist with trial preparation.	1.40	\$325	455.00
05/07/2025	IG	Zoom meeting with client.	0.60	\$325	195.00
05/07/2025	IG	Confer with R. Mahrle re: litigation strategy and settlement.	0.40	\$325	130.00
05/07/2025	RKM	Evaluate attorneys fees issue. Prep for conference with client. Conference call with client rep. Follow-up email.	2.40	\$450	1,080.00
05/07/2025	TR	Make second pass review for responsiveness, privilege and redactions for batches 6, 7, 10, 11, 14, 25 and those items in Folder 6 and Folder 7 (approx. 6,000 documents)	3.20	\$225	720.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 06/30/2025

RE: Gethsemani Baptist Church

Invoice Number 338446

ID MMV 12990-0002

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						Fees	
Date	Atty	Description	Hours	Rate	Amount		
05/07/2025	TR	Receive and review new documents from client (Folder 7), make arrangements to have them added to Relativity and tag them as responsive in preparation for upcoming production.	0.70	\$225	157.50		
05/08/2025	IG	Phone call with Judge Snow's chambers re: settlement conference.	0.10	\$325	32.50		
05/08/2025	IG	Review hundreds of documents in preparation for disclosure.	1.00	\$325	325.00		
05/08/2025	IG	Draft stipulation to extend unexpired deadlines and proposed order.	1.60	\$325	520.00		
05/08/2025	IG	Send R. Gardner emails re: settlement.	0.20	\$325	65.00		
05/08/2025	TR	Continue review and run queries relate to batches 6, 7, 10, 11, 14, 25 and those items in Folder 6 and Folder 7 in preparation for 3rd production.	3.60	\$225	810.00		
05/09/2025	IG	Review and modify stipulation to extend unexpired deadlines and related proposed order.	0.80	\$325	260.00		
05/09/2025	IG	Review thousands of documents in preparation for disclosure.	2.20	\$325	715.00		
05/09/2025	IG	Send email to R. Gardner re: stipulation to extend unexpired deadlines and related proposed order.	0.20	\$325	65.00		
05/09/2025	TR	Work with First Legal to finalize PROD003 to include responsive documents from batches 6, 7, 10, 11, 14, 25 and those items in Folder 6 and Folder 7.	3.10	\$225	697.50		
05/12/2025	IG	Finalize stipulation to extend unexpired deadlines and related proposed order.	0.30	\$325	97.50		
05/12/2025	IG	Confer with R. Mahrle re: settlement and discovery.	0.20	\$325	65.00		
05/12/2025	IG	Send email to K. Macuil re: mediation.	0.20	\$325	65.00		
05/12/2025	IG	Review documents in case file to determine potential questions re: M. Castro's deposition.	0.30	\$325	97.50		
05/12/2025	IG	Send emails to R. Gardner re: stipulation to extend unexpired deadlines and discovery dispute.	0.30	\$325	97.50		
05/12/2025	RKM	Discuss settlement conference issues.	0.10	\$450	45.00		
05/13/2025	IG	Develop strategy as it pertains to mediation with particular focus on mediator selection, timing, and obtaining council approval.	0.30	\$325	97.50		
05/13/2025	IG	Phone call with K. Macuil.	0.40	\$325	130.00		
05/13/2025	IG	Review profiles of potential mediators.	0.30	\$325	97.50		

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 06/30/2025

RE: Gethsemani Baptist Church

Invoice Number 338446

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
05/14/2025	IG	Phone call with K. Macuil.	0.10	\$325	32.50
05/14/2025	IG	Send email to K. Macuil re: mediation.	0.20	\$325	65.00
05/14/2025	IG	Send email to R. Gardner re: mediation.	0.20	\$325	65.00
05/14/2025	IG	Review next steps re: mediation with particular focus on timing, possible terms, and approval process.	0.40	\$325	130.00
05/15/2025	IG	Confer with T. Roa re: document disclosure and review next steps as it pertains to mediation.	0.30	\$325	97.50
05/15/2025	IG	Send emails to R. Gardner, Judge Albrecht, and K. Macuil re: mediation.	0.40	\$325	130.00
05/16/2025	IG	Send emails to K. Macuil re: mediation.	0.20	\$325	65.00
05/16/2025	IG	Begin drafting mediation memorandum.	0.30	\$325	97.50
05/16/2025	IG	Review documents provided by Judge Albrecht re: upcoming mediation.	0.20	\$325	65.00
05/16/2025	IG	Confer with R. Marhle re: mediation strategy.	0.30	\$325	97.50
05/16/2025	RKM	Start outline for mediation memo.	0.50	\$450	225.00
05/16/2025	TR	Draft data input/output log to track all incoming and outgoing data.	0.40	\$225	90.00
05/19/2025	IG	Phone call with K. Macuil.	0.40	\$325	130.00
05/19/2025	IG	Send emails to K. Macuil and R. Mahrle re: mediation.	0.20	\$325	65.00
05/19/2025	IG	Confer with R. Mahrle re: mediation strategy.	0.20	\$325	65.00
05/19/2025	IG	Continue drafting mediation memorandum.	1.10	\$325	357.50
05/20/2025	IG	Review applicable law to assist with drafting mediation memo legal background section.	1.50	\$325	487.50
05/20/2025	IG	Begin drafting mediation memo legal background section.	1.60	\$325	520.00
05/21/2025	IG	Draft mediation memorandum introduction, prior settlement discussions, anticipated outcome at trial, and additional information sections.	2.20	\$325	715.00
05/21/2025	IG	Draft mediation memorandum factual background section.	2.10	\$325	682.50
05/21/2025	IG	Draft mediation memorandum legal background section and modify factual background.	2.90	\$325	942.50
05/21/2025	IG	Microsoft Teams meeting with K. Macuil, J. Torres, and J. Guzman.	0.60	\$325	195.00
05/21/2025	IG	Attend City Council meeting.	0.90	\$325	292.50
05/21/2025	RKM	Prepare for meeting with the City re settlement discussions. Review proposed conditions. Meet with town officials on strategy. Meet with City Council.	1.80	\$450	810.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 06/30/2025

RE: Gethsemani Baptist Church

Invoice Number 338446

ID MMV 12990-0002

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						Fees
Date	Atty	Description	Hours	Rate	Amount	
05/22/2025	IG	Phone calls with K. Macuil.	0.40	\$325	130.00	
05/22/2025	IG	Confer with R. Mahrle re: mediation memo and mediation strategy.	0.30	\$325	97.50	
05/22/2025	IG	Prepare mediation memorandum exhibits with particular focus on photographs demonstrating nuisance created by Food Ministry.	1.50	\$325	487.50	
05/22/2025	IG	Modify mediation memorandum to incorporate edits from R. Mahrle and K. Macuil, and strengthen factual and legal background sections.	1.90	\$325	617.50	
05/22/2025	RKM	Revise draft of mediation memo.	0.60	\$450	270.00	
05/23/2025	IG	Send email to K. Macuil and J. Torres re: mediation memorandum.	0.10	\$325	32.50	
05/23/2025	IG	Send email to Judge Albrecht re: mediation.	0.10	\$325	32.50	
05/23/2025	IG	Send emails to R. Gardner re: mediation and discovery response extension.	0.20	\$325	65.00	
05/23/2025	IG	Send emails and calendar invites to City mediation attendees re: mediation.	0.10	\$325	32.50	
05/23/2025	IG	Confer with T. Roa re: document case file maintenance and next disclosure of documents.	0.20	\$325	65.00	
05/23/2025	IG	Prepare talking points for upcoming mediation.	0.40	\$325	130.00	
05/24/2025	RKM	Review emails re possible alternative sites.	0.10	\$450	45.00	
05/27/2025	IG	Prepare for mediation by reviewing mediation memorandum, pleadings, and other disclosures.	0.60	\$325	195.00	
05/27/2025	IG	Participate in mediation.	4.40	\$325	1,430.00	
05/27/2025	IG	Confer with R. Marhle re: mediation and send email to K. Macuil regarding the same.	0.20	\$325	65.00	
05/27/2025	IG	Review hundreds of documents in preparation for disclosure.	1.00	\$325	325.00	
05/27/2025	IG	Review email from K. Macuil re: Pastor Castro potentially disclosing confidential mediation communications to media and analyze next steps.	0.30	\$325	97.50	
05/27/2025	RKM	Prep for mediation. Mediation.	5.00	\$450	2,250.00	
05/28/2025	IG	Send email to K. Macuil re: Plaintiff's potential disclosure of confidential mediation communications.	0.10	\$325	32.50	
05/28/2025	IG	Confer with R. Mahrle re: next steps in litigation with particular focus on settlement.	0.20	\$325	65.00	

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 06/30/2025
 Invoice Number 338446
 Page 7

Fees

Date	Atty	Description	Hours	Rate	Amount
05/28/2025	IG	Continue reviewing documents in preparation for disclosure.	0.30	\$325	97.50
05/28/2025	RKM	Research re laches and waiver argument against the City.	3.20	\$450	1,440.00
05/28/2025	TR	Continue to review documents in First Legal database for responsiveness and provide shared link to Ivan for review of most recent production.	1.40	\$225	315.00
05/29/2025	IG	Confer with R. Mahrle re: dispute as it pertains to Church's financial documents and information.	0.20	\$325	65.00
05/29/2025	IG	Review Plaintiff's responses to discovery requests, correspondence between the parties, and applicable law to determine strategy as it pertains to discovery dispute re: Plaintiff's production of Church's financial documents and information.	1.40	\$325	455.00
05/29/2025	RKM	Review proposed discovery stipulations.	0.20	\$450	90.00
05/29/2025	TR	Organize all productions that have been made to date and provide saved search from Relativity to Ivan for review of the most recently prepared production.	1.40	\$225	315.00
05/30/2025	IG	Send emails to K. Macuil re: depositions and sending letter to Church to discuss issues with Food Ministry.	0.30	\$325	97.50
05/30/2025	IG	Send email to R. Gardner re: scheduling depositions.	0.20	\$325	65.00
05/30/2025	IG	Review client emails and documents re: issues to discuss with Church as it pertains to Food Ministry.	0.30	\$325	97.50
05/30/2025	IG	Draft letter for Church re: issues to discuss as it pertains to Food Ministry.	1.40	\$325	455.00
05/30/2025	RKM	Work on issues letter to send to the church.	0.50	\$450	225.00
Total Fees			110.60		36,957.50

Disbursements

Date	Description	Amount
05/21/2025	Express Mail; FedEx - Express Mail - G&B IG to Rebecca A. Albrecht - Delivered 5/22/2025	28.71
05/01/2025	Online research; Thomson Reuters - West - Online research - April Searches - Richard Mahrle	86.34
05/15/2025	Arbitrators/mediators; BOWMAN AND BROOKE, LLP - Arbitrators/mediators - Gethsemani Baptist Church v. City of San Luis Private Mediation	3,600.00
Total Disbursements		3,715.05

Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 06/30/2025
Invoice Number 338446
Page 8

Timekeeper	Hours	Rate	Amount	
CCA Artigue, Cameron C.	2.20	450.00	990.00	
IG Gonzalez, Ivan	64.70	325.00	21,027.50	
RKM Mahrle, Richard K.	22.70	450.00	10,215.00	
TR Roa, Traci	21.00	225.00	4,725.00	
Total Fees			\$36,957.50	
Total Disbursements			3,715.05	
Discount			-\$10,672.55	
Total Current Charges				\$30,000.00
5/21/2025 Previous balance			\$30,000.00	
06/10/2025 Payment - Thank you, Check # 112230			-\$30,000.00	
Net Balance Forward				\$0.00
Total Balance Due				\$30,000.00

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**GAMMAGE
&
BURNHAM**

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FEDERAL TAX ID 86-0450146

July 25, 2025

Invoice 339639

ID: MMV 12990-0002
RE: Gethsemani Baptist Church

For Services Rendered Through: June 30, 2025

Previous Balance	\$30,000.00
Payments	-\$30,000.00
Balance Forward	\$0.00
Current Fees	\$55,367.50
Current Expenses	\$1,172.78
Total Current Charges	\$56,540.28
Total Due	\$56,540.28

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 07/25/2025
Invoice Number 339639
Page 2

				Fees		
Date	Atty	Description	Hours	Rate	Amount	
06/02/2025	IG	Review and modify letter to R. Gardner re: Food Ministry discussion.	1.10	\$325	357.50	
06/02/2025	IG	Send emails to K. Macuil re: letter to Church pertaining to discussion with Church pertaining to issues with Food Ministry.	0.10	\$325	32.50	
06/02/2025	IG	Confer with R. Mahrle re: depositions and settlement discussions with Church.	0.20	\$325	65.00	
06/02/2025	RKM	Comment on letter outlining issues. Confer re depositions.	0.30	\$450	135.00	
06/03/2025	EMR	Continue to review emails and documents in advance of production of the same.	1.40	\$325	455.00	
06/03/2025	IG	Finalize deposition notices re: J. Castro and N. Castro.	0.20	\$325	65.00	
06/03/2025	IG	Analyze next steps in litigation with particular focus on depositions, discovery disputes, and settlement and confer with R. Mahrle re: the same.	0.40	\$325	130.00	
06/03/2025	IG	Send emails to K. Macuil re: depositions.	0.20	\$325	65.00	
06/04/2025	EMR	Continue to review emails and documents in advance of production of the same.	1.80	\$325	585.00	
06/04/2025	IG	Confer with C. Artigue and R. Mahrle re: discovery and summary judgment strategy.	0.40	\$325	130.00	
06/04/2025	IG	Send email to R. Gardner re: document production discovery dispute.	0.20	\$325	65.00	
06/04/2025	IG	Review law re: legislative privilege.	0.70	\$325	227.50	
06/04/2025	IG	Phone call with K. Macuil re: Mayor Reidel's deposition.	0.30	\$325	97.50	
06/04/2025	IG	Send email to K. Macuil re: Mayor Reidel's deposition.	0.10	\$325	32.50	
06/04/2025	IG	Develop strategy re: Mayor Reidel's deposition.	0.30	\$325	97.50	
06/04/2025	RKM	Confer about strategy re MPSJ and depositions.	0.20	\$450	90.00	
06/05/2025	EMR	Continue to review emails and documents in advance of production of the same.	1.80	\$325	585.00	

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 07/25/2025

RE: Gethsemani Baptist Church

Invoice Number 339639

ID MMV 12990-0002

Page 3

Fees

Date	Atty	Description	Hours	Rate	Amount
06/05/2025	IG	Send emails to R. Gardner re: discovery dispute.	0.20	\$325	65.00
06/06/2025	IG	Review correspondence and discovery responses in preparation for meet and confer with opposing counsel.	0.30	\$325	97.50
06/06/2025	IG	Phone call with opposing counsel regarding, among other things, settlement and discovery disputes.	0.60	\$325	195.00
06/06/2025	IG	Analyze next step re: discovery disputes and confer with R. Mahrle re: the same.	0.40	\$325	130.00
06/06/2025	RKM	Confer with I. Gonzalez re status.	0.40	\$450	180.00
06/09/2025	IG	Send emails to opposing counsel re: issues with Church's responses to second set of discovery requests.	0.20	\$325	65.00
06/09/2025	IG	Confer with R. Mahrle re: settlement and litigation strategy.	0.30	\$325	97.50
06/09/2025	IG	Confer with team re: technical issues with reviewing Church's responses to second set of discovery requests.	0.20	\$325	65.00
06/09/2025	IG	Continue reviewing Church's responses to second set of discovery requests and review items for potential disclosure.	0.50	\$325	162.50
06/09/2025	IG	Begin reviewing Church's responses to City's second set of discovery requests.	0.60	\$325	195.00
06/09/2025	TR	Receive and review Plaintiff's responses to second set of discovery, download video and discuss download issues.	0.40	\$225	90.00
06/10/2025	IG	Send email to R. Gardner re: discovery dispute and deposition of Mayor Riedel.	0.30	\$325	97.50
06/10/2025	IG	Confer with R. Mahrle re: discovery dispute and deposition of Mayor Reidel.	0.10	\$325	32.50
06/10/2025	IG	Send emails to K. Macuil re: deposition of Mayor Reidel.	0.10	\$325	32.50
06/10/2025	IG	Review items for potential disclosure.	0.20	\$325	65.00
06/10/2025	TR	Continue to review remaining documents for responsiveness, privilege and issue tagging.	1.60	\$225	360.00
06/10/2025	TR	Review Relativity regarding error message and communicate with First Legal regarding the same (Note: there was an issue with the ECA archive and First Legal will correct the issue so the errors will no longer appear)	0.40	\$225	90.00
06/11/2025	CCA	Prepare questions for deposition of pastor Castro	0.80	\$450	360.00
06/11/2025	IG	Confer with C. Artigue and R. Mahrle regarding, among other things, settlement and general strategy.	0.50	\$325	162.50
06/11/2025	IG	Send email to opposing counsel re: discovery dispute.	0.20	\$325	65.00
06/11/2025	IG	Send email to K. Macuil re: settlement.	0.20	\$325	65.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 07/25/2025

RE: Gethsemani Baptist Church

Invoice Number 339639

ID MMV 12990-0002

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Fees

Date	Atty	Description	Hours	Rate	Amount
06/11/2025	IG	Analyze next steps in litigation with particular focus on arguments for discovery dispute conference and settlement strategy.	0.60	\$325	195.00
06/11/2025	IG	Phone call with K. Macuil regarding, among other things, settlement.	0.50	\$325	162.50
06/11/2025	RKM	Start work on preparing for Pastor's deposition.	0.80	\$450	360.00
06/12/2025	IG	Phone call with opposing counsel re: discovery dispute and other items.	0.40	\$325	130.00
06/12/2025	IG	Review law re: 1st Amendment religious privilege to prepare for discovery dispute teleconference.	1.50	\$325	487.50
06/12/2025	IG	Send emails to court re: discovery dispute teleconference.	0.30	\$325	97.50
06/12/2025	IG	Confer with team re: deposition preparations.	0.30	\$325	97.50
06/12/2025	IG	Review disclosures and discovery responses to prepare for upcoming depositions of M. Castro and N. Castro.	1.10	\$325	357.50
06/12/2025	RKM	Review email re Castro's land purchase.	0.10	\$450	45.00
06/12/2025	TR	Continue to review remaining documents for responsiveness, privilege and issue tagging and work with First Legal regarding the processing of SANLUIS003.	1.40	\$225	315.00
06/13/2025	IG	Send email to opposing counsel re: interpreter selection.	0.20	\$325	65.00
06/13/2025	IG	Correspond with staff re: retaining interpreter for Castros depositions.	0.10	\$325	32.50
06/13/2025	IG	Begin preparing outline for discovery dispute telephone conference.	0.40	\$325	130.00
06/13/2025	IG	Send emails to K. Macuil and R. Mahrle re: settlement discussion.	0.20	\$325	65.00
06/16/2025	IG	Phone call with R. Gardner re: discovery dispute.	0.20	\$325	65.00
06/16/2025	IG	Send email to K. Macuil re: settlement discussion and phone call re: the same.	0.20	\$325	65.00
06/16/2025	IG	Draft discovery dispute joint report.	1.50	\$325	487.50
06/16/2025	IG	Review and modify third supplemental disclosure statement.	0.30	\$325	97.50
06/16/2025	IG	Review and modify outline for discovery dispute telephone conference.	0.50	\$325	162.50
06/16/2025	IG	Review thousands of documents in preparation for disclosure.	4.70	\$325	1,527.50
06/16/2025	IG	Confer with R. Mahrle re: discovery dispute strategy.	0.20	\$325	65.00
06/16/2025	RKM	Start prep for plaintiff depositions.	4.50	\$450	2,025.00

Gammage & Burnham

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Fees					
Date	Atty	Description	Hours	Rate	Amount
06/17/2025	CCA	Prepare for and call with City Attorney and City Manager re settlement points and strategy	0.60	\$450	270.00
06/17/2025	IG	Microsoft Teams meeting with J. Torres, K. Macuil, and attorneys.	0.90	\$325	292.50
06/17/2025	IG	Draft Joint Statement re: Discovery Dispute.	0.70	\$325	227.50
06/17/2025	IG	Review and modify third supplemental disclosure statement.	0.30	\$325	97.50
06/17/2025	IG	Confer with R. Mahrle re: discovery dispute conference strategy.	0.30	\$325	97.50
06/17/2025	RKM	Work on draft of joint statement of discovery dispute. Continue prep for Pastor Castro's deposition. Conference call with client.	5.70	\$450	2,565.00
06/17/2025	TR	Edit supplemental disclosure statement and finalize production.	1.00	\$225	225.00
06/17/2025	TR	Continue to review remaining documents for responsiveness, privilege and issue tagging.	1.50	\$225	337.50
06/18/2025	IG	Prepare and rehearse arguments for today's discovery dispute conference.	2.10	\$325	682.50
06/18/2025	IG	Participate in discovery dispute conference.	0.40	\$325	130.00
06/18/2025	IG	Send email to opposing counsel re: discovery dispute.	0.20	\$325	65.00
06/18/2025	IG	Send email to opposing counsel re: discovery dispute.	0.20	\$325	65.00
06/18/2025	IG	Send email to K. Macuil re: trip to San Luis, depositions, and discovery dispute victory.	0.40	\$325	130.00
06/18/2025	IG	Confer with team re: status of deposition interpreter and court reporter.	0.20	\$325	65.00
06/18/2025	IG	Review and modify notice of disclosure.	0.20	\$325	65.00
06/18/2025	IG	Send email to B. Olsen re: interpreters in Yuma County.	0.20	\$325	65.00
06/18/2025	IG	Confer with R. Mahrle re: various issues including discovery dispute victory, depositions, and discovery.	0.50	\$325	162.50
06/18/2025	IG	Review voluminous documents in preparation for disclosure.	1.00	\$325	325.00
06/18/2025	RKM	Continue prep for Pastor Castro's depo. Call with the Court.	5.70	\$450	2,565.00
06/18/2025	TR	Continue to review remaining documents for responsiveness, privilege and issue tagging with focus on batch 24 (approx. 1,000 documents)	1.70	\$225	382.50
06/19/2025	IG	Send email to K. Macuil re: upcoming depositions.	0.20	\$325	65.00

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Fees

Date	Atty	Description	Hours	Rate	Amount
06/19/2025	IG	Confer with R. Mahrle and staff re: upcoming depositions of J. Castro and N. Castro.	0.30	\$325	97.50
06/19/2025	RKM	Continue prep for pastor's depo.	1.70	\$450	765.00
06/19/2025	TR	Run various searches for documents tagged as Hot, download, organize and print those that have been produced for review in preparation for upcoming depositions, and prepare for production those documents that have not been produced and tagged as Hot.	3.30	\$225	742.50
06/20/2025	IG	Send email to K. Macuil re: court report issue.	0.10	\$325	32.50
06/20/2025	IG	Confer with R. Mahrle re: deposition and discovery strategy.	0.20	\$325	65.00
06/20/2025	IG	Send emails to R. Mahrle re: document disclosure.	0.20	\$325	65.00
06/20/2025	IG	Send email to R. Gardner re: deposition scheduling and protective order.	0.30	\$325	97.50
06/20/2025	RKM	Continue prep for Pastor's deposition. Conference with I. Gonzalez re issues to raise during deposition and scheduling issues.	1.60	\$450	720.00
06/20/2025	TR	Work on family conflict within document set for those being prepared for production, provide detailed instructions to First Legal to finalize production, draft fourth supplemental disclosure statement.	1.70	\$225	382.50
06/20/2025	TR	Continue to review remaining documents for responsiveness, privilege and issue tagging.	1.40	\$225	315.00
06/22/2025	IG	Send email to K. Macuil re: deposition scheduling.	0.10	\$325	32.50
06/22/2025	IG	Review thousands of documents in preparation for disclosure.	6.50	\$325	2,112.50
06/22/2025	RKM	Review new documents to be produced. Separate out those needed for Pastor's depo. Continue prep for Pastor's depositions.	3.50	\$450	1,575.00
06/23/2025	IG	Confer with T. Roa re: document disclosure strategy.	0.30	\$325	97.50
06/23/2025	IG	Confer with R. Marhle re: deposition strategy.	0.40	\$325	130.00
06/23/2025	IG	Review voluminous documents in preparation for disclosure.	2.10	\$325	682.50
06/23/2025	IG	Review documents in case file to assist with N. Castro's deposition preparation.	1.80	\$325	585.00
06/23/2025	IG	Send email to K. Macuil re: deposition preparation.	0.20	\$325	65.00
06/23/2025	RKM	Continue prep for Pastor Castro's depo. Consult with I. Gonzalez on discovery issues.	1.90	\$450	855.00

Gammage & Burnham

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Fees					
Date	Atty	Description	Hours	Rate	Amount
06/23/2025	TR	Assist with identifying and organizing key documents in preparation for upcoming depositions this week.	2.40	\$225	540.00
06/23/2025	TR	Work with First Legal to finalize document production for our Fourth Supplemental Disclosure Statement.	1.00	\$225	225.00
06/23/2025	TR	Edit and finalize fourth supplemental disclosure statement and provide links to production to all parties.	0.40	\$225	90.00
06/23/2025	TR	Create multiple saved searched in Relativity related to those documents that need further review and those remaining to be produced.	0.80	\$225	180.00
06/24/2025	IG	Call with R. Gardner re: protective order.	0.30	\$325	97.50
06/24/2025	IG	Send email to R. Gardner re: protective order.	0.30	\$325	97.50
06/24/2025	IG	Confer with R. Mahrle re: protective order.	0.40	\$325	130.00
06/24/2025	IG	Exchange emails with R. Mahrle re: protective order.	0.30	\$325	97.50
06/24/2025	IG	Review draft protective order.	0.50	\$325	162.50
06/24/2025	IG	Send email to K. Macuil re: depositions.	0.30	\$325	97.50
06/24/2025	IG	Review disclosures and discovery responses in preparation for N. Castro's deposition.	2.10	\$325	682.50
06/24/2025	IG	Draft N. Castro's deposition outline.	4.30	\$325	1,397.50
06/24/2025	RKM	Review proposed protective order. Conference with I. Gonzalez.	0.30	\$450	135.00
06/25/2025	IG	Review modified protective order and send email to R. Gardner re: the same.	0.40	\$325	130.00
06/25/2025	IG	Confer with R. Marhle re: N. Castro deposition strategy.	0.40	\$325	130.00
06/25/2025	IG	Review documents in case file and finalize N. Castro deposition exhibits.	1.00	\$325	325.00
06/25/2025	IG	Review voluminous documents in preparation for disclosure.	1.10	\$325	357.50
06/25/2025	IG	Finalize N. Castro deposition outline.	2.50	\$325	812.50
06/25/2025	IG	Travel to San Luis for depositions and visit key sites.	4.20	\$325	1,365.00
06/25/2025	RKM	Emails re marking of deposition exhibits. Continue depo prep. Travel to San Luis. Evaluate church property.	8.70	\$450	3,915.00
06/26/2025	IG	Finalize N. Castro deposition outline.	0.50	\$325	162.50
06/26/2025	IG	Attend deposition of J. Castro, take deposition of N. Castro, and meeting with K. Macuil and J. Torres	9.60	\$325	3,120.00
06/26/2025	RKM	Castro deposition in San Luis. Meet with clients.	9.70	\$450	4,365.00
06/27/2025	IG	Travel from Yuma to Phoenix.	3.00	\$325	975.00

Gammage & Burnham

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Fees

Date	Atty	Description	Hours	Rate	Amount
06/27/2025	IG	Email court reporter re: deposition exhibits.	0.10	\$325	32.50
06/27/2025	RKM	Return from San Luis depositions.	2.90	\$450	1,305.00
06/30/2025	IG	Confer with R. Mahrle re: deposition strategy.	0.30	\$325	97.50
06/30/2025	IG	Send calendar invites to several City of San Luis employees re: upcoming depositions.	0.30	\$325	97.50
06/30/2025	IG	Send emails to K. Macuil re: depositions.	0.20	\$325	65.00
06/30/2025	IG	Send email to A. Guevara and J. Campa re: upcoming depositions.	0.20	\$325	65.00
06/30/2025	IG	Review documents and pleadings to prepare A. Gomez, A. Guevara, and J. Campa for depositions.	1.50	\$325	487.50
06/30/2025	IG	Review thousands of documents in preparation for disclosure.	2.70	\$325	877.50
06/30/2025	RKM	Start depo prep outlines with focus on the Mayor.	3.40	\$450	1,530.00
Total Fees			155.90		55,367.50

Disbursements

Date	Description	Amount
06/27/2025	Translation; Patrick Brandlin - Translation - Interpreter/Translator - Depositions of Jose Miguel Castro and Maria Noemi Castro - Mileage - Per Diem	910.40
06/01/2025	Online research; Thomson Reuters - West - Online research - May Searches - Richard Mahrle	35.13
06/18/2025	Photocopy Expense	3 @ 0.25 0.75
06/20/2025	Photocopy Expense	95 @ 0.25 23.75
06/20/2025	Photocopy Expense- Color	177 @ 0.35 61.95
06/22/2025	Photocopy Expense	6 @ 0.25 1.50
06/22/2025	Photocopy Expense	3 @ 0.25 0.75
06/23/2025	Photocopy Expense	1 @ 0.25 0.25
06/25/2025	Photocopy Expense	18 @ 0.25 4.50
06/25/2025	Photocopy Expense	12 @ 0.25 3.00
06/25/2025	Photocopy Expense	1 @ 0.25 0.25
06/25/2025	Photocopy Expense- Color	14 @ 0.35 4.90
06/25/2025	Photocopy Expense- Color	4 @ 0.35 1.40
06/25/2025	Photocopy Expense- Color	10 @ 0.35 3.50
06/25/2025	Photocopy Expense- Color	6 @ 0.35 2.10
06/25/2025	Photocopy Expense- Color	4 @ 0.35 1.40
06/25/2025	Photocopy Expense- Color	8 @ 0.35 2.80
06/25/2025	Photocopy Expense- Color	2 @ 0.35 0.70
06/25/2025	Photocopy Expense- Color	4 @ 0.35 1.40

Gammage & Burnham

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 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

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Disbursements			
Date	Description		Amount
06/25/2025	Photocopy Expense- Color	22 @ 0.35	7.70
06/25/2025	Photocopy Expense- Color	24 @ 0.35	8.40
06/25/2025	Photocopy Expense- Color	42 @ 0.35	14.70
06/25/2025	Photocopy Expense- Color	4 @ 0.35	1.40
06/25/2025	Photocopy Expense- Color	4 @ 0.35	1.40
06/25/2025	Photocopy Expense- Color	3 @ 0.35	1.05
06/25/2025	Photocopy Expense- Color	20 @ 0.35	7.00
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	10 @ 0.35	3.50
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	20 @ 0.35	7.00
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	5 @ 0.35	1.75
06/25/2025	Photocopy Expense- Color	55 @ 0.35	19.25
06/25/2025	Photocopy Expense- Color	52 @ 0.35	18.20
06/25/2025	Photocopy Expense- Color	20 @ 0.35	7.00
Total Disbursements			1,172.78

Timekeeper		Hours	Rate	Amount
CCA	Artigue, Cameron C.	1.40	450.00	630.00
IG	Gonzalez, Ivan	79.10	325.00	25,707.50
RKM	Mahrle, Richard K.	51.40	450.00	23,130.00
TR	Roa, Traci	19.00	225.00	4,275.00
EMR	Russell, Evan M	5.00	325.00	1,625.00
Total Fees				\$55,367.50
Total Disbursements				1,172.78

Total Current Charges **\$56,540.28**

6/30/2025	Previous balance	\$30,000.00
07/08/2025	Payment - Thank you, Check # 112493	-\$30,000.00

Net Balance Forward **\$0.00**

Total Balance Due **\$56,540.28**

COPY

City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
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**GAMMAGE
&
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FEDERAL TAX ID 86-0450146

September 2, 2025

Invoice 340260

*July
Services*

ID: MMV 12990-0002
RE: Gethsemani Baptist Church

For Services Rendered Through: July 31, 2025

Previous Balance	\$56,540.28
Payments	-\$56,540.28
Balance Forward	\$0.00
Current Fees	\$49,600.00
Current Expenses	\$754.54
Total Current Charges	\$50,354.54
Total Due	\$50,354.54

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



Zelle

Gammage & Burnham

CLIENT: City of San Luis
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Date	Atty	Description	Hours	Rate	Amount
07/01/2025	IG	Microsoft Teams meeting with Mayor Reidel to prepare her for deposition.	1.50	\$450	675.00
07/01/2025	IG	Review voluminous documents in preparation for disclosure.	1.20	\$450	540.00
07/01/2025	IG	Review pleadings, disclosures, and discovery responses in preparation for meetings with A. Gomez and J. Guzman re: their upcoming depositions.	1.30	\$450	585.00
07/01/2025	IG	Send email to City staff re: Plaintiff's notice of Rule 30(b)(6) deposition.	0.20	\$450	90.00
07/01/2025	IG	Confer with R. Marhle re: deposition strategy.	0.30	\$450	135.00
07/01/2025	IG	Send email to O. Jenkins and Mayor Riedel re: the Mayor's upcoming deposition.	0.20	\$450	90.00
07/01/2025	RKM	Depo prep for Mayor. Work on Torres outline. Outline prep for Torres.	5.00	\$450	2,250.00
07/02/2025	IG	Review documents in case file to prepare A. Gomez for deposition.	1.80	\$325	585.00
07/02/2025	IG	Meeting with A. Gomez re: deposition.	1.80	\$325	585.00
07/02/2025	IG	Meeting with J. Torres re: deposition.	1.50	\$325	487.50
07/02/2025	IG	Meeting with J. Guzman re: deposition.	1.50	\$325	487.50
07/02/2025	IG	Phone call with K. Macuil.	0.30	\$325	97.50
07/02/2025	IG	Phone call with J. Campa re: 30(b)(6) deposition.	0.20	\$325	65.00
07/02/2025	IG	Send email to R. Gardner re: 30(b)(6) deposition.	0.30	\$325	97.50
07/02/2025	IG	Review and modify fifth supplemental disclosure statement and finalize document production.	0.40	\$325	130.00
07/02/2025	RKM	Continue depo prep. Attend part of Gomez depo prep. Emails with C. C. Artigue re legal issues. Conference I. Gonzalez re document production. Depo prep for Torres and Guzman.	5.20	\$450	2,340.00

Gammage & Burnham

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Fees					
Date	Atty	Description	Hours	Rate	Amount
07/02/2025	TR	Review final set of documents for production, create searches for those items tagged for redaction and perform redactions.	1.40	\$225	315.00
07/02/2025	TR	Create saved searches for any inconsistent tagging, review documents within that search to correct inconsistencies, prepare search for PROD005 and work with First Legal to finalize production.	1.30	\$225	292.50
07/03/2025	IG	Review disclosures, discovery responses, and City codes in preparation for A. Guevara's deposition.	1.80	\$325	585.00
07/03/2025	IG	Meeting with A. Guevara re: deposition.	1.80	\$325	585.00
07/03/2025	IG	Confer with R. Mahrle re: litigation strategy.	0.20	\$325	65.00
07/03/2025	RKM	Depo prep for Guevara.	2.20	\$450	990.00
07/04/2025	JAF	research the doctrine of legislative privilege as it relates to oral testimony	0.50	\$225	112.50
07/04/2025	JAF	research the doctrine of legislative privilege as it relates to written communications	0.70	\$225	157.50
07/07/2025	IG	Phone call with K. Macuil re: depositions.	0.30	\$325	97.50
07/07/2025	IG	Phone calls with A. Gomez and A. Guevara re: depositions.	0.10	\$325	32.50
07/07/2025	IG	Send emails to K. Macuil re: depositions and City of San Luis city council meeting.	0.10	\$325	32.50
07/07/2025	IG	Send emails to R. Gardner re: deposition scheduling.	0.20	\$325	65.00
07/07/2025	JAF	outline parameters for determining when an official act is considered to be legislative or administrative	1.20	\$225	270.00
07/07/2025	JAF	apply research to analyze issue of whether acts of enforcement of zoning laws are legislative or administrative	0.80	\$225	180.00
07/08/2025	IG	Determine next steps re: capturing Church and Pastor Castro's Facebook activity as it pertains to Facebook accounts and confer with T. Roa regarding the same.	0.20	\$325	65.00
07/08/2025	IG	Send email to R. Gardner re: deposition scheduling.	0.10	\$325	32.50
07/08/2025	IG	Send emails to K. Macuil and J. Torres re: aerial photos of Church and deposition scheduling.	0.20	\$325	65.00
07/08/2025	IG	Send email to R. Gardner re: deposition scheduling.	0.10	\$325	32.50
07/08/2025	JAF	catalog additional relevant and persuasive case law related to legislative privilege in the context of zoning enforcement actions	1.40	\$225	315.00
07/08/2025	RKM	Evaluate and report on church financials.	2.30	\$450	1,035.00

Gammage & Burnham

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Fees					
Date	Atty	Description	Hours	Rate	Amount
07/08/2025	TR	Review and evaluate emails for responsiveness in preparation for additional productions.	3.20	\$225	720.00
07/09/2025	IG	Phone call with K. Macuil and J. Torres re: settlement.	0.50	\$325	162.50
07/09/2025	IG	Confer with C. Artigue regarding, among other things, case and settlement strategy and depositions.	0.40	\$325	130.00
07/09/2025	IG	Phone call with K. Macuil and J. Guzman regarding, among other things, deposition scheduling, settlement strategy, and City Council meeting.	0.50	\$325	162.50
07/09/2025	IG	Send email to K. Macuil and J. Torres re: potential settlement terms and City Council meeting.	0.30	\$325	97.50
07/09/2025	IG	Review list of potential settlement terms provided by K. Macuil and City staff.	0.40	\$325	130.00
07/09/2025	IG	Phone call with R. Mahrle regarding, among other things, case and settlement strategy.	0.30	\$325	97.50
07/09/2025	IG	Attend City Council meeting.	1.60	\$325	520.00
07/09/2025	JAF	construct potential arguments for establishing how deposition testimony and internal communications might be protected from disclosure under legislative privilege	1.70	\$225	382.50
07/09/2025	RKM	Conference with I. Gonzalez re settlement options. Review settlement parameters being suggested by the City. Follow-up discussions with I. Gonzalez.	1.00	\$450	450.00
07/09/2025	TR	Review and evaluate emails for responsiveness in preparation for additional productions.	1.00	\$225	225.00
07/09/2025	TR	Follow-up with First Legal regarding collection of social media data.	0.30	\$225	67.50
07/10/2025	IG	Send email to R. Gardner re: deposition scheduling.	0.10	\$325	32.50
07/10/2025	IG	Draft letter to R. Gardner re: potential settlement.	4.50	\$325	1,462.50
07/10/2025	JAF	draft memorandum detailing research and arguments in furtherance of establishing legislative privilege for potential deposition testimony	1.60	\$225	360.00
07/10/2025	RKM	Review settlement parameters from City Council meeting. Telephone calls with I. Gonzalez. Review final calculation prepared by T. Roa. Revise draft of settlement letter.	1.40	\$450	630.00
07/10/2025	TR	Review and evaluate production from Plaintiff's related to its financial documents, create chart showing analysis regarding the same.	3.30	\$225	742.50
07/11/2025	CCA	Review terms of proposed settlement and edits to same	0.30	\$450	135.00
07/11/2025	CCA	Emails to and from City Attorney	0.20	\$450	90.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 09/02/2025

RE: Gethsemani Baptist Church

Invoice Number 340260

ID MMV 12990-0002

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Fees					
Date	Atty	Description	Hours	Rate	Amount
07/11/2025	IG	Phone call with K. Macuil re: settlement letter to Church and general litigation strategy.	0.40	\$325	130.00
07/11/2025	IG	Send email to R. Gardner re: deposition scheduling.	0.20	\$325	65.00
07/11/2025	IG	Send emails to K. Macuil re: deposition scheduling and settlement letter.	0.30	\$325	97.50
07/11/2025	IG	Send emails to N. Riedel, J. Torres, J. Guzman, A. Guevara, and A. Gomez re: depositions.	0.20	\$325	65.00
07/11/2025	IG	Review and modify settlement letter to Church.	1.10	\$325	357.50
07/14/2025	IG	Review Church business license documents provided by client.	0.20	\$325	65.00
07/14/2025	IG	Confer with staff re: disclosure of Church business license documents and aerial photographs.	0.20	\$325	65.00
07/14/2025	IG	Review legislative privilege memorandum in preparation for next week's depositions.	0.20	\$325	65.00
07/14/2025	TR	Review and evaluate documents for responsiveness in preparation for additional production and deposition preparation.	2.00	\$225	450.00
07/15/2025	IG	Review potential items to address before close of discovery and settlement strategy.	0.30	\$325	97.50
07/15/2025	IG	Confer with M. Vaz and C. Artigue re: settlement discussions.	0.40	\$325	130.00
07/15/2025	RKM	Conference with I. Gonzalez re strategy.	0.10	\$450	45.00
07/15/2025	TR	Review and evaluate emails for responsiveness in preparation for additional productions.	2.00	\$225	450.00
07/16/2025	CCA	Call with Kay Macuil re council meeting and settlement	0.50	\$450	225.00
07/16/2025	IG	Phone call with K. Macuil and C. Artigue re: settlement with particular focus on conditional use permit application process.	0.50	\$325	162.50
07/16/2025	IG	Phone calls with C. Artigue re: settlement strategy, City Council's authority as it pertains to settlement, and next steps.	0.80	\$325	260.00
07/16/2025	IG	Send emails to D. Peterson re: settlement.	0.20	\$325	65.00
07/16/2025	IG	Send email to K. Macuil re: Church's settlement term sheet.	0.30	\$325	97.50
07/16/2025	IG	Review Church's settlement term sheet.	0.40	\$325	130.00
07/16/2025	RKM	Review proposed terms sheet. Follow-up emails.	0.40	\$450	180.00
07/17/2025	CCA	Call with opposing counsel re settlement	0.50	\$450	225.00
07/17/2025	CCA	Outline response to term sheet and discuss settlement	0.40	\$450	180.00

Gammage & Burnham

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RE: Gethsemani Baptist Church
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Fees

Date	Atty	Description	Hours	Rate	Amount
07/17/2025	IG	Phone calls with C. Artigue and D. Peterson re: settlement.	0.90	\$325	292.50
07/17/2025	IG	Phone call with J. Torres and K. Macuil.	0.80	\$325	260.00
07/17/2025	IG	Send email to R. Marhle, C. Artigue, and M. Vaz re: settlement strategy.	0.20	\$450	90.00
07/17/2025	IG	Draft stipulation to extend unexpired deadlines and related proposed order.	1.80	\$450	810.00
07/17/2025	RKM	Emails re settlement terms.	0.30	\$450	135.00
07/18/2025	IG	Calls with D. Peterson re: deposition scheduling and settlement.	0.20	\$325	65.00
07/18/2025	IG	Review and modify Second Stipulation to Extend Unexpired Deadlines and related proposed order.	0.30	\$325	97.50
07/18/2025	IG	Exchange emails with R. Mahrle, C. Artigue, and M. Vaz re: settlement discussions and City Council executive session.	0.30	\$325	97.50
07/18/2025	IG	Send emails to Mayor Riedel, J. Torres, J. Guzman, A. Gomez, and A. Guevara re: deposition scheduling and case status.	0.40	\$325	130.00
07/20/2025	RKM	Email from Ms. Macuil re City Council request. Follow-up emails.	0.20	\$450	90.00
07/21/2025	IG	Exchange emails with R. Marhle, C. Artigue, and M. Vaz re: settlement strategy, discovery, and Court order denying stipulation to extend unexpired deadlines.	0.30	\$325	97.50
07/21/2025	IG	Send emails and text messages to D. Peterson and Church's attorneys re: discovery and settlement.	0.40	\$325	130.00
07/21/2025	IG	Phone calls with R. Mahrle re: discovery and settlement strategy.	0.30	\$325	97.50
07/21/2025	IG	Confer with M. Vaz and R. Mahrle re: discovery and settlement strategy.	0.30	\$325	97.50
07/21/2025	IG	Phone call with D. Peterson re: Court order denying stipulation to extend unexpired deadlines, discovery, and settlement.	0.20	\$325	65.00
07/21/2025	IG	Phone call with K. Macuil re: Court order denying stipulation to extend unexpired deadlines, depositions, and settlement.	0.20	\$325	65.00
07/21/2025	RKM	Confer with I. Gonzalez re discovery and settlement issues. Follow-up conference calls.	0.70	\$450	315.00
07/22/2025	IG	Send email to K. Macuil re: settlement conditions and next steps.	0.20	\$325	65.00

Gammage & Burnham

CLIENT: City of San Luis

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Fees

Date	Atty	Description	Hours	Rate	Amount
07/22/2025	IG	Send email to Mayor Riedel re: deposition scheduling.	0.10	\$325	32.50
07/22/2025	IG	Send emails to J. Torres, J. Guzman, A. Gomez, and A. Guevara re: deposition scheduling.	0.20	\$325	65.00
07/22/2025	IG	Send emails to J. Torres, K. Macuil, and J. Guzman re: settlement terms and next steps.	0.40	\$325	130.00
07/22/2025	IG	Review documents re: settlement terms from City and Church in preparation for drafting letter to Church.	0.50	\$325	162.50
07/22/2025	IG	Phone calls with K. Macuil re: discovery, settlement, and next steps.	0.60	\$325	195.00
07/22/2025	IG	Review letter from Church re: deposition scheduling and settlement.	0.10	\$325	32.50
07/22/2025	IG	Phone calls with D. Peterson and R. Gardner.	0.30	\$325	97.50
07/22/2025	IG	Confer with R. Mahrle re: settlement strategy.	0.20	\$325	65.00
07/22/2025	IG	Draft letter to Church re: settlement.	2.10	\$325	682.50
07/22/2025	IG	Exchange emails with R. Marhle and M. Vaz re: settlement status and negoations.	0.30	\$325	97.50
07/22/2025	RKM	Confer with I. Gonzalez re settlement approaches. Telephone call with I. Gonzalez re status.	0.50	\$450	225.00
07/23/2025	IG	Exchange emails with R. Mahrle and M. Vaz re: settlement response letter.	0.40	\$325	130.00
07/23/2025	IG	Prepare additional documents for disclosure and confer with T. Roa re: the same.	0.90	\$325	292.50
07/23/2025	IG	Review and modify settlement response letter.	1.00	\$325	325.00
07/23/2025	IG	Send emails to K. Macuil, J. Torres, J. Guzman and other City employees re: settlement response letter and deposition scheduling.	0.30	\$325	97.50
07/23/2025	RKM	Review City input and draft letter. Review and comment on final of letter to Church outlining settlement terms.	0.80	\$450	360.00
07/24/2025	IG	Review and modify settlement letter to Church.	1.40	\$450	630.00
07/24/2025	IG	Send emails to K. Macuil, J. Torres, and J. Guzman re: settlement discussions.	0.30	\$450	135.00
07/24/2025	IG	Exchange emails with R. Mahrle and M. Vaz re: settlement discussions.	0.30	\$450	135.00
07/24/2025	IG	Send emails to J. Torres and Mayor Riedel re: depositions.	0.20	\$450	90.00
07/24/2025	IG	Send email to R. Gardner re: deposition scheduling.	0.20	\$450	90.00
07/24/2025	IG	Review and modify supplemental disclosure statement.	0.30	\$450	135.00
07/24/2025	IG	Phone call with R. Mahrle re: settlement.	0.30	\$450	135.00

Gammage & Burnham

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RE: Gethsemani Baptist Church
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Fees

Date	Atty	Description	Hours	Rate	Amount
07/24/2025	RKM	Confer with I. Gonzalez re settlement strategy.	0.40	\$450	180.00
07/24/2025	TR	Review file and database to confirm we are producing all additional data for deadline of 7/25, have additional data added to Relativity database, draft supplemental disclosure statement.	1.50	\$225	337.50
07/25/2025	IG	Settlement meeting with Gethsemani Baptist Church.	4.20	\$325	1,365.00
07/25/2025	IG	Confer with R. Mahrle re: settlement discussions.	0.30	\$325	97.50
07/25/2025	IG	Prepare Fifth Supplemental Disclosure Statement and finalize document production.	0.80	\$325	260.00
07/25/2025	IG	Teleconference with J. Guzman, J. Torres, and K. Macuil	1.10	\$325	357.50
07/25/2025	RKM	Telephone calls with I. Gonzalez re settlement negotiations.	0.70	\$450	315.00
07/25/2025	TR	Identify additional documents to be disclosed and have them uploaded to the database, review and tag responsive photos and documents, work with First Legal to finalize production, edit and finalize supplemental disclosure statement.	2.70	\$225	607.50
07/28/2025	IG	Exchange emails with R. Mahrle, M. Vaz, and C. Artigue re: Church's new term sheet and next steps in settlement efforts.	0.40	\$325	130.00
07/28/2025	IG	Send emails K. Macuil, J. Torres, and J. Guzman re: Church's new term sheet.	0.40	\$325	130.00
07/28/2025	IG	Call with R. Mahrle re: Church's new settlement term sheet.	0.30	\$325	97.50
07/28/2025	IG	Send email to Church's attorneys re: Church property site inspecetion.	0.20	\$325	65.00
07/28/2025	IG	Make edits to Church's settlement term sheet and send email to K. Macuil, J. Torres, and J. Guzman re: the same.	1.60	\$325	520.00
07/28/2025	IG	Review Church's updated term sheet and prior versions of the same to advise client.	0.90	\$325	292.50
07/28/2025	RKM	Review church terms sheet and send comments. Follow-up emails. Conference call with I. Gonzalez.	0.90	\$450	405.00
07/29/2025	IG	Microsoft Teams meeting with K. Macuil, R. Mahrle, J. Torres, and J. Guzman re: settlement terms.	0.50	\$450	225.00
07/29/2025	IG	Microsoft Teams meeting with City staff, M. Castro, and Church attorneys re: settlement.	3.00	\$450	1,350.00
07/29/2025	IG	Exchange emails with R. Mahrle, M. Vaz, and C. Artigue re: settlement and City Council issues.	0.40	\$450	180.00
07/29/2025	IG	Send emails to K. Macuil and City staff re: settlement term.	0.30	\$450	135.00

Gammage & Burnham

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Fees

Date	Atty	Description	Hours	Rate	Amount
07/29/2025	IG	Send email to R. Gardner re: deposition scheduling and discovery.	0.10	\$450	45.00
07/29/2025	IG	Phone calls with R. Mahrle re: settlement issues.	0.40	\$450	180.00
07/29/2025	IG	Phone calls with K. Macuil re: settlement and City Council issues.	0.60	\$450	270.00
07/29/2025	IG	Review Church's draft settlement term sheet.	0.40	\$450	180.00
07/29/2025	RKM	Review latest edition of the terms sheet. Confer with I. Gonzalez. Follow-up emails re conference with clients. Conference call with client reps. Settlement conference. Conference with our clients. Follow-up with I. Gonzalez.	2.80	\$450	1,260.00
07/30/2025	CCA	Comment on settlement drafts	0.70	\$450	315.00
07/30/2025	IG	Review documents and correspondence from client and modify draft settlement term sheet.	1.40	\$450	630.00
07/30/2025	IG	Phone calls with K. Macuil and other City employees re: settlement terms.	0.80	\$450	360.00
07/30/2025	IG	Calls with R. Mahrle re: settlement terms and next steps.	0.50	\$450	225.00
07/30/2025	IG	Calls with M. Vaz re: settlement terms and City Council meeting.	0.20	\$450	90.00
07/30/2025	IG	Send emails to Mayor Riedel, J. Torres, J. Guzman, A. Gomez, and A. Guevara re: deposition scheduling.	0.30	\$450	135.00
07/30/2025	IG	Modify draft settlement term sheet based on comments and edits from City staff.	0.90	\$450	405.00
07/30/2025	IG	Send email to Church's attorneys re: draft settlement term sheet.	0.20	\$450	90.00
07/30/2025	IG	Send communications to K. Macuil re: settlement term sheet and City Council meeting.	0.20	\$450	90.00
07/30/2025	IG	Review City's inspection report re: Church property.	0.30	\$450	135.00
07/30/2025	IG	Prepare for City Council meeting.	0.80	\$450	360.00
07/30/2025	IG	Attend and participate in City Council meeting.	2.30	\$450	1,035.00
07/30/2025	IG	Review Church's response to draft settlement term sheet and determine next steps in settlement.	0.20	\$450	90.00
07/30/2025	RKM	Review and comment on our revised terms sheet. Review property inspection report. Confer with I. Gonzalez re strategy.	1.40	\$450	630.00
07/31/2025	IG	Phone calls with R. Gardner re: settlement terms.	0.60	\$450	270.00
07/31/2025	IG	Several phone calls with K. Macuil and other members of City Staff.	1.50	\$450	675.00

Gammage & Burnham

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Fees

Date	Atty	Description	Hours	Rate	Amount
07/31/2025	IG	Review Church's settlement term sheet counter.	0.40	\$450	180.00
07/31/2025	IG	Phone calls with R. Mahrle re: settlement term sheet and general settlement strategy.	0.90	\$450	405.00
07/31/2025	IG	Exchange emails with R. Mahrle and M. Vaz re: settlement term sheet and settlement generally.	0.20	\$450	90.00
07/31/2025	IG	Send emails to K. Macuil, J. Torres, and J. Guzman re: settlement term sheet and settlement generally.	0.30	\$450	135.00
07/31/2025	IG	Send email to R. Gardner re: settlement term sheet.	0.20	\$450	90.00
07/31/2025	IG	Draft updated settlement term sheet and send to Church's attorneys.	2.20	\$450	990.00
07/31/2025	RKM	Review latest proposal from the client. Strategy conferences with I. Gonzalez. Review and comment on revised terms sheet. Follow-up emails.	2.40	\$450	1,080.00
Total Fees			137.30		49,600.00

Disbursements

Date	Description	Amount
07/01/2025	Out-of-town travel; RADISSON HOTEL - Out-of-town travel - Hotel Accomodations for IG in San Luis During Depositions	234.82
07/01/2025	Out-of-town travel; RADISSON HOTEL - Out-of-town travel - RKM Hotel Accommodations in San Luis During Depositions	234.82
07/08/2025	MILEAGE; Ivan Gonzalez - Mileage Reimbursement - Travel to/from San Luis for Depos	407 @ 0.70 284.90
Total Disbursements		754.54

Gammage & Burnham

CLIENT: City of San Luis
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Timekeeper	Hours	Rate	Amount	
CCA Artigue, Cameron C.	2.60	450.00	1,170.00	
JAF Flickinger, Jessica A.	7.90	225.00	1,777.50	
IG Gonzalez, Ivan	49.60	325.00	16,120.00	
IG Gonzalez, Ivan	29.80	450.00	13,410.00	
RKM Mahrle, Richard K.	28.70	450.00	12,915.00	
TR Roa, Traci	18.70	225.00	4,207.50	
Total Fees			\$49,600.00	
Total Disbursements			754.54	
Total Current Charges				\$50,354.54
7/25/2025 Previous balance			\$56,540.28	
08/05/2025 Payment - Thank you, Check # 112837			-\$56,540.28	
Net Balance Forward				\$0.00
Total Balance Due				\$50,354.54

**GAMMAGE
&
BURNHAM**

Attorneys at Law

City of San Luis
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San Luis City Attorney
Janet Taylor
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TELEPHONE (602) 256-0566
FEDERAL TAX ID 86-0450146

September 18, 2025

Invoice 341729

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

August Services

For Services Rendered Through: August 31, 2025

Current Fees	\$8,685.00
Total Current Charges	\$8,685.00
Total Due	\$8,685.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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CLIENT: City of San Luis
RE: Gethsemani Baptist Church
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Invoice Date 09/18/2025
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Fees					
Date	Atty	Description	Hours	Rate	Amount
08/01/2025	IG	Phone calls with R. Gardner re: settlement terms.	0.80	\$450	360.00
08/01/2025	IG	Review and modify several drafts of settlement term sheet.	1.80	\$450	810.00
08/01/2025	IG	Send emails to K. Macuil and J. Torres re: settlement terms.	0.30	\$450	135.00
08/01/2025	IG	Exchange emails with R. Mahrle and M. Vaz re: settlement terms and City Council executive session.	0.40	\$450	180.00
08/01/2025	IG	Send emails to R. Gardner re: settlement terms.	0.30	\$450	135.00
08/01/2025	IG	Participate in City Council executive session.	0.50	\$450	225.00
08/01/2025	IG	Phone calls with K. Macuil and City staff re: settlement terms.	0.80	\$450	360.00
08/01/2025	RKM	Review and comment on our latest terms sheet. Review and comment on the church's proposal. Confer with I. Gonzalez re strategy. Review final response from clients.	2.60	\$450	1,170.00
08/02/2025	RKM	Review and comment on proposed counsel adoption of the settlement agreement.	0.10	\$450	45.00
08/04/2025	IG	Phone call with R. Gardner re: depositions and settlement agreement.	0.20	\$450	90.00
08/04/2025	IG	Send email to K. Macuil re: depositions.	0.10	\$450	45.00
08/05/2025	IG	Send emails to City employees re: cancelled depositions.	0.10	\$450	45.00
08/05/2025	IG	Draft notice of settlement and send email to R. Mahrle re: the same.	0.40	\$450	180.00
08/06/2025	IG	Review and modify Notice of Settlement and send to R. Gardner.	0.30	\$450	135.00
08/06/2025	RKM	Review and comment on draft notice of settlement.	0.20	\$450	90.00
08/07/2025	IG	Review proposed edits to Notice of Settlement and send email to R. Mahrle re: the same.	0.20	\$450	90.00
08/08/2025	IG	Review and modify Notice of Settlement.	0.30	\$450	135.00
08/08/2025	IG	Send email to R. Gardner re: notice of settlement.	0.10	\$450	45.00
08/08/2025	RKM	Email re notice of settlement language. Conference with I. Gonzalez.	0.20	\$450	90.00

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
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Fees

Date	Atty	Description	Hours	Rate	Amount
08/18/2025	RKM	Draft formal settlement agreement.	2.60	\$450	1,170.00
08/19/2025	IG	Review and modify draft settlement agreement and send to K. Macuil.	1.30	\$450	585.00
08/19/2025	RKM	Revise draft of formal settlement agreement. Review and comment on changes made by I. Gonzalez.	2.20	\$450	990.00
08/20/2025	RKM	Review Kay's proposed changes to formal settlement agreement. Make additional edits.	0.90	\$450	405.00
08/26/2025	IG	Send emails to R. Gardner re: settlement agreement.	0.20	\$450	90.00
08/26/2025	IG	Review draft settlement agreement and prepare exhibits to the same.	0.70	\$450	315.00
08/26/2025	IG	Phone calls with K. Macuil and R. Mahrle re: settlement agreement.	0.30	\$450	135.00
08/26/2025	RKM	Telephone call with I. Gonzalez re completion of settlement.	0.10	\$450	45.00
08/28/2025	IG	Review next steps in litigation with particular focus on finalizing settlement agreement.	0.20	\$450	90.00
08/29/2025	RKM	Review changes to settlement agreement sought by First Liberty. Comments to I. Gonzalez.	0.40	\$450	180.00
08/30/2025	IG	Review Church's edits to draft settlement agreement and make additional edits to the same.	0.70	\$450	315.00

Total Fees 19.30 8,685.00

Timekeeper		Hours	Rate	Amount
IG	Gonzalez, Ivan	10.00	450.00	4,500.00
RKM	Mahrle, Richard K.	9.30	450.00	4,185.00
Total Fees				\$8,685.00

Total Current Charges \$8,685.00

Total Balance Due	\$8,685.00
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GAMMAGE & BURNHAM

Attorneys at Law

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City of San Luis
Kay Macuil (kmacuil@sanluisaz.gov)
San Luis City Attorney
Janet Taylor
jtaylor@sanluisaz.gov

September 18, 2025

Invoice 341729

Aug Services

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: August 31, 2025

Previous Balance	\$50,354.54
Payments	\$0.00
Balance Forward	\$50,354.54
Current Fees	\$8,685.00
Total Current Charges	\$8,685.00
Total Due	\$59,039.54

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis
RE: Gethsemani Baptist Church
ID MMV 12990-0002

Invoice Date 09/18/2025
Invoice Number 341729
Page 2

Prior Invoice Date	Invoice Number	Original Amount	Payments & Credits	Prior Invoice Balance
09/02/2025	340260	\$50,354.54	\$0.00	\$50,354.54
Total Outstanding Balance				\$50,354.54

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 09/18/2025

RE: Gethsemani Baptist Church

Invoice Number 341729

ID MMV 12990-0002

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Fees

Date	Atty	Description	Hours	Rate	Amount
08/01/2025	IG	Phone calls with R. Gardner re: settlement terms.	0.80	\$450	360.00
08/01/2025	IG	Review and modify several drafts of settlement term sheet.	1.80	\$450	810.00
08/01/2025	IG	Send emails to K. Macuil and J. Torres re: settlement terms.	0.30	\$450	135.00
08/01/2025	IG	Exchange emails with R. Mahrle and M. Vaz re: settlement terms and City Council executive session.	0.40	\$450	180.00
08/01/2025	IG	Send emails to R. Gardner re: settlement terms.	0.30	\$450	135.00
08/01/2025	IG	Participate in City Council executive session.	0.50	\$450	225.00
08/01/2025	IG	Phone calls with K. Macuil and City staff re: settlement terms.	0.80	\$450	360.00
08/01/2025	RKM	Review and comment on our latest terms sheet. Review and comment on the church's proposal. Confer with I. Gonzalez re strategy. Review final response from clients.	2.60	\$450	1,170.00
08/02/2025	RKM	Review and comment on proposed counsel adoption of the settlement agreement.	0.10	\$450	45.00
08/04/2025	IG	Phone call with R. Gardner re: depositions and settlement agreement.	0.20	\$450	90.00
08/04/2025	IG	Send email to K. Macuil re: depositions.	0.10	\$450	45.00
08/05/2025	IG	Send emails to City employees re: cancelled depositions.	0.10	\$450	45.00
08/05/2025	IG	Draft notice of settlement and send email to R. Mahrle re: the same.	0.40	\$450	180.00
08/06/2025	IG	Review and modify Notice of Settlement and send to R. Gardner.	0.30	\$450	135.00
08/06/2025	RKM	Review and comment on draft notice of settlement.	0.20	\$450	90.00
08/07/2025	IG	Review proposed edits to Notice of Settlement and send email to R. Mahrle re: the same.	0.20	\$450	90.00
08/08/2025	IG	Review and modify Notice of Settlement.	0.30	\$450	135.00
08/08/2025	IG	Send email to R. Gardner re: notice of settlement.	0.10	\$450	45.00
08/08/2025	RKM	Email re notice of settlement language. Conference with I. Gonzalez.	0.20	\$450	90.00
08/18/2025	RKM	Draft formal settlement agreement.	2.60	\$450	1,170.00
08/19/2025	IG	Review and modify draft settlement agreement and send to K. Macuil.	1.30	\$450	585.00
08/19/2025	RKM	Revise draft of formal settlement agreement. Review and comment on changes made by I. Gonzalez.	2.20	\$450	990.00
08/20/2025	RKM	Review Kay's proposed changes to formal settlement agreement. Make additional edits.	0.90	\$450	405.00

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 09/18/2025
 Invoice Number 341729
 Page 4

Fees

Date	Atty	Description	Hours	Rate	Amount
08/26/2025	IG	Send emails to R. Gardner re: settlement agreement.	0.20	\$450	90.00
08/26/2025	IG	Review draft settlement agreement and prepare exhibits to the same.	0.70	\$450	315.00
08/26/2025	IG	Phone calls with K. Macuil and R. Mahrle re: settlement agreement.	0.30	\$450	135.00
08/26/2025	RKM	Telephone call with I. Gonzalez re completion of settlement.	0.10	\$450	45.00
08/28/2025	IG	Review next steps in litigation with particular focus on finalizing settlement agreement.	0.20	\$450	90.00
08/29/2025	RKM	Review changes to settlement agreement sought by First Liberty. Comments to I. Gonzalez.	0.40	\$450	180.00
08/30/2025	IG	Review Church's edits to draft settlement agreement and make additional edits to the same.	0.70	\$450	315.00

Total Fees 19.30 8,685.00

Timekeeper		Hours	Rate	Amount
IG	Gonzalez, Ivan	10.00	450.00	4,500.00
RKM	Mahrle, Richard K.	9.30	450.00	4,185.00
Total Fees				\$8,685.00

Total Current Charges \$8,685.00

9/2/2025 Previous balance \$50,354.54

Net Balance Forward \$50,354.54

Total Balance Due	\$59,039.54
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GAMMAGE & BURNHAM

Attorneys at Law

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Janet Taylor
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FEDERAL TAX ID 86-0450146

October 15, 2025

Invoice 342716

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: September 30, 2025

Previous Balance	\$59,039.54
Payments	-\$59,039.54
Balance Forward	\$0.00
Current Fees	\$7,110.00
Total Current Charges	\$7,110.00
Total Due	\$7,110.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



Zelle®

Gammage & Burnham

CLIENT: City of San Luis

RE: Gethsemani Baptist Church

ID MMV 12990-0002

Invoice Date 10/15/2025

Invoice Number 342716

Page 2

Fees

Date	Atty	Description	Hours	Rate	Amount
09/01/2025	IG	Send email to K. Macuil re: draft settlement agreement.	0.30	\$450	135.00
09/02/2025	IG	Modify draft settlement agreement.	0.80	\$450	360.00
09/02/2025	IG	Send email to K. Macuil and J. Guzman re: draft settlement agreement.	0.20	\$450	90.00
09/02/2025	IG	Send email to R. Gardner re: draft settlement agreement.	0.20	\$450	90.00
09/02/2025	IG	Phone call with R. Marhle re: settlement agreement.	0.10	\$450	45.00
09/02/2025	RKM	Review and comment on final of settlement agreement.	0.30	\$450	135.00
09/03/2025	IG	Phone call with R. Mahrle re: settlement.	0.10	\$450	45.00
09/03/2025	IG	Phone call with R. Gardner re: settlement and consent decree.	0.20	\$450	90.00
09/03/2025	IG	Send email to K. Macuil re: settlement.	0.10	\$450	45.00
09/03/2025	IG	Send email to K. Macuil re: settlement.	0.20	\$450	90.00
09/03/2025	IG	Phone calls with K. Macuil re: settlement.	0.40	\$450	180.00
09/03/2025	RKM	Confer with I. Gonzalez re consent decree issues.	0.10	\$450	45.00
09/04/2025	IG	Send email to K. Macuil re: settlement agreement edits.	0.10	\$450	45.00
09/04/2025	IG	PLACEHOLDER - Send emails to R. Garner and K. Macuil - Call with K. Macuil	0.80	\$450	360.00
09/08/2025	IG	Confer with R. Mahrle re: settlement issues.	0.20	\$450	90.00
09/08/2025	IG	Send emails to K. Macuil re: settlement issues.	0.20	\$450	90.00
09/08/2025	IG	Review draft settlement agreement and related exhibits and make edits to the same.	0.70	\$450	315.00
09/08/2025	IG	Phone call with K. Macuil re: settlement.	0.20	\$450	90.00
09/08/2025	RKM	Confer with I. Gonzalez re status of settlement agreement.	0.40	\$450	180.00
09/09/2025	IG	Confer with R. Mahrle re: settlement agreement and proposed consent decree.	0.30	\$450	135.00

Gammage & Burnham

CLIENT: City of San Luis

Invoice Date 10/15/2025

RE: Gethsemani Baptist Church

Invoice Number 342716

ID MMV 12990-0002

Page 3

Fees

Date	Atty	Description	Hours	Rate	Amount
09/09/2025	IG	Review and modify draft motion for consent decree and proposed consent decree.	1.60	\$450	720.00
09/09/2025	IG	Send emails to K. Macuil and City employees re: draft consent decree and proposed consent decree.	0.30	\$450	135.00
09/09/2025	IG	Phone call with K. Macuil re: settlement and City Council meeting.	0.10	\$450	45.00
09/09/2025	RKM	Confer with I. Gonzalez re Consent Decree.	0.20	\$450	90.00
09/10/2025	IG	Phone call with K. Macuil re: draft settlement agreement.	0.50	\$450	225.00
09/10/2025	IG	Send emails to K. Macuil and R. Gardner re: draft settlement agreement.	0.20	\$450	90.00
09/10/2025	IG	Review K. Macuil and J. Guzman's edits to draft settlement agreement.	0.70	\$450	315.00
09/11/2025	IG	Analyze issues re: 28 U.S.C. 2201 and motion for consent decree and proposed consent.	0.40	\$450	180.00
09/11/2025	IG	Review and modify motion for consent decree and proposed consent decree.	0.70	\$450	315.00
09/11/2025	IG	Send emails to K. Macuil re: motion for consent decree and proposed consent decree.	0.20	\$450	90.00
09/11/2025	IG	Send email to R. Gardner re: motion for consent decree and proposed consent decree.	0.10	\$450	45.00
09/12/2025	IG	Send email to R. Gardner re: status of settlement documents.	0.20	\$450	90.00
09/12/2025	RKM	Review and comment on agenda for special council meeting.	0.20	\$450	90.00
09/15/2025	IG	Send emails to K. Macuil re: settlement and consent decree documents.	0.20	\$450	90.00
09/15/2025	IG	Send emails to R. Gardner re: settlement and consent decree documents.	0.20	\$450	90.00
09/15/2025	IG	Modify and finalize settlement agreement with exhibits, joint motion for consent decree, and proposed consent decree.	1.00	\$450	450.00
09/15/2025	TR	Assist with finalizing Settlement Agreement.	0.40	\$225	90.00
09/16/2025	IG	Review correspondence and City Council materials from K. Macuil.	0.10	\$450	45.00
09/17/2025	RKM	Prepare for City Council meeting. Attend meeting for approval of the settlement.	0.60	\$450	270.00

Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 10/15/2025
 Invoice Number 342716
 Page 4

Fees					
Date	Atty	Description	Hours	Rate	Amount
09/18/2025	RKM	Emails related to getting settlement docs signed. Receive fully signed documents.	0.30	\$450	135.00
09/24/2025	RKM	Respond to email from Kay re changing the terms of the CUP.	0.10	\$450	45.00
09/27/2025	RKM	Provide responses to Kay re various questions and issues related to the settlement.	0.30	\$450	135.00
09/29/2025	RKM	Draft proposed public statement for the City re the settlement. Make revisions and forward to the City.	1.20	\$450	540.00
09/29/2025	TR	Review Order and Consent Decree and provide instructions regarding docketing upcoming deadlines.	0.20	\$225	45.00
09/30/2025	IG	Review consent decree entered by Court.	0.20	\$450	90.00
			Total Fees	16.10	7,110.00

Timekeeper		Hours	Rate	Amount
IG	Gonzalez, Ivan	11.80	450.00	5,310.00
RKM	Mahrle, Richard K.	3.70	450.00	1,665.00
TR	Roa, Traci	0.60	225.00	135.00
Total Fees				\$7,110.00

Total Current Charges **\$7,110.00**

9/18/2025	Previous balance	\$59,039.54
09/30/2025	Payment - Thank you, Check # 113356	-\$50,354.54
09/30/2025	Payment - Thank you, Check # 113356	-\$8,685.00

Net Balance Forward **\$0.00**

Total Balance Due	\$7,110.00
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**GAMMAGE
&
BURNHAM**

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November 17, 2025

Invoice 343820

Dot Sumner

ID: MMV 12990-0002

RE: Gethsemani Baptist Church

For Services Rendered Through: October 31, 2025

Previous Balance	\$7,110.00
Payments	-\$7,110.00
Balance Forward	\$0.00
Current Fees	\$675.00
Total Current Charges	\$675.00
Total Due	\$675.00

Pay via wire transfer – JPMorgan Chase ABA Routing 021000021 / Account 31903149
Pay via ACH – JPMorgan Chase ABA Routing 122100024 / Account 31903149
Pay online via credit card (3% service charge) – <https://www.gblaw.com/online-payments/>
Pay via Zelle - payments@gblaw.com (or scan QR code in your banking app)



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Gammage & Burnham

CLIENT: City of San Luis
 RE: Gethsemani Baptist Church
 ID MMV 12990-0002

Invoice Date 11/17/2025
 Invoice Number 343820
 Page 2

Fees

Date	Atty	Description	Hours	Rate	Amount
10/02/2025	RKM	Emails with Kay re payment terms and who payment should go to.	0.30	\$450	135.00
10/10/2025	IG	Confer with R. Marhle re: status of settlement tasks.	0.10	\$450	45.00
10/14/2025	IG	Send email to K. Macuil re: settlement agreement payment.	0.10	\$450	45.00
10/16/2025	IG	Send email to Kay Macuil re: the designation of point of contact for the Gethsemani Baptist Church litigation.	0.10	\$450	45.00
10/16/2025	IG	Send email to Ryan Gardner re: substantiation of the receipt of the settlement agreement payment.	0.20	\$450	90.00
10/21/2025	IG	Review Consent Decree and settlement agreement to determine compliance deadlines. Send emails to K. Macuil re: the same.	0.70	\$450	315.00

Total Fees 1.50 675.00

Timekeeper		Hours	Rate	Amount
IG	Gonzalez, Ivan	1.20	450.00	540.00
RKM	Mahrle, Richard K.	0.30	450.00	135.00
Total Fees				\$675.00

Total Current Charges **\$675.00**

10/15/2025	Previous balance	\$7,110.00
10/28/2025	Payment - Thank you, Check # 113602	-\$7,110.00

Net Balance Forward **\$0.00**

Total Balance Due	\$675.00
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