

# PATTERSON LAW FIRM, L.L.P.

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Executive Council of Iowa  
Victoria Newton, Executive Council  
1st Floor South, State Capitol  
1007 E. Grand Ave  
Des Moines, IA 50319  
Attn: Jonathan Bergman

Invoice Date: May 31, 2022  
Invoice #: 194792  
Account #: IA.0138  
RMC  
Federal Tax I.D.: 42-0894999

RE: Breckenridge v. Iowa Judicial Branch  
Claimant: Debra Breckenridge  
Employer: Iowa Judicial Branch  
D/I: 10/06/2015

## FINAL BILL

### Fees

			<u>Hours</u>	
05/09/2022	RMC	Correspondence to Jon Bergman reminding of 5/16/22 mediation.	0.10	16.00
	RMC	Receipt and review of correspondence from Jon Bergman confirming telephone conference to discuss claim on 5/12/22, in advance of upcoming mediation.	0.10	16.00
05/10/2022	RMC	Correspondence to Meredith Cooney requesting claimant's deposition.	0.10	16.00
	RMC	Cursory review of relevant file materials, including notes from claimant's deposition, rating reports and discovery responses in preparation for telephone conference with Jon Bergman to discuss claim and settlement authority.	0.70	112.00
	RMC	Correspondence to Jon Bergman regarding transcript of claimant's deposition.	0.10	16.00
	BNS	Review of claimant's deposition transcript in preparation for upcoming mediation.	1.30	156.00
05/11/2022	RMC	Receipt and review of correspondence from Erik Bair setting forth claimant's initial settlement demand (15 pages).	0.20	32.00
	RMC	Correspondence to Jon Bergman regarding claimant's initial settlement demand.	0.10	16.00
	RMC	Receipt and review of correspondence from Jon Bergman requesting copy of claimant's IME report, Answers to Interrogatories and printout of indemnity benefits paid.	0.10	16.00

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		<u>Hours</u>	
	RMC Correspondence to Jon Bergman regarding IME report from Dr. Kuhnlein, Claimant's Answers to Interrogatories and printout of indemnity paid by the State.	0.10	16.00
	RMC Receipt and review of 5/10/22 report from Dr. Chen, served by Meredith Cooney.	0.10	16.00
	RMC Correspondence to Jon Bergman regarding 5/10/22 report from Dr. Chen.	0.10	16.00
	BNS Mediation preparation, including review of claimant's demand letter, report of Dr. Kuhnlein, Claimant's discovery responses, indemnity payment history, and calculation of potential exposure for purposes of settlement.	1.90	228.00
	BNS Review of report of Dr. Chen in preparation for upcoming mediation.	0.20	24.00
05/12/2022	RMC Telephone conference with Jon Bergman discussing issues in the case, potential exposure and settlement value in preparation for upcoming mediation.	0.30	48.00
05/13/2022	RMC Receipt and review of 5/10/22 vocational evaluation report from Phil Davis, served by Erik Bair.	0.30	48.00
	RMC Correspondence to Jon Bergman regarding vocational report from Phil Davis, obtained on behalf of the claimant.	0.10	16.00
	BNS Review of report of Phil Davis, Claimant's vocational expert, finding permanent total disability (100% disability), and consideration of the same in preparation for upcoming mediation.	0.20	24.00
	BNS Preparation for upcoming mediation, including review of exposure analysis prepared by RMC.	0.50	60.00
05/16/2022	BNS Prepare for Mediation, including review of medical chronology and personnel file materials, job description, and termination/resignation letters.	2.00	240.00
	BNS Attend and participate in Mediation with Jon Bergman for the Second Injury Fund (Zoom Mediation-no travel time included).	3.30	396.00
	BNS Correspondence to and from Jon Bergman regarding confirmation of mediation agreement/settlement terms.	0.10	12.00
	BNS Correspondence to and from mediator and opposing counsel, confirming mediation agreement/settlement terms.	0.10	12.00
05/17/2022	RMC Receipt and review of proposed social security offset language for settlement documents, forwarded by Erik Bair.	0.10	16.00
	RMC Preparation of proposed Compromise Settlement agreement and		

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	Addendum thereto.		0.60	96.00
	RMC Correspondence to Erik Bair requesting execution and return of settlement documents.		0.10	16.00
	RMC Correspondence to Jon Bergman confirming preparation of settlement documents and regarding settlement check.		0.10	16.00
05/18/2022	RMC Preparation of Notice of Settlement as required for filing by the Division of Workers' Compensation.		0.20	32.00
05/24/2022	RMC Receipt and review of executed settlement documents from claimant's attorney, Erik Bair.		0.10	16.00
	RMC Correspondence to the Division of Workers' Compensation requesting review and approval of Compromise Settlement agreement.		0.10	16.00
05/25/2022	RMC Receipt and review of notice from Deputy Andrew Philips regarding required changes to settlement documents between claimant and the State prior to approval.		0.10	16.00
	RMC Receipt and review of notice from Deputy Philips requesting 2013 date of injury be included in settlement documents.		0.10	16.00
	RMC Revisions to Compromise Settlement agreement and Addendum to include 2013 date of injury per request of Deputy Philips.		0.10	16.00
	RMC Correspondence to Erik Bair advising of changes to settlement documents per Deputy Philips.		0.10	16.00
05/26/2022	RMC Receipt and review of approved settlement documents from the Division of Workers' Compensation.		0.10	16.00
	RMC Correspondence to Erik Bair regarding approved settlement documents and settlement check coming from the State.		0.10	16.00
	RMC Correspondence to Jon Bergman regarding approved settlement documents and settlement check.		0.10	16.00
	TOTAL FEES		14.10	1,872.00

Recapitulation

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Ryan M. Clark	Partner	4.50	\$160.00	\$720.00
Brittany N. Salyars	Associate	9.60	120.00	1,152.00

TOTAL THIS STATEMENT 1,872.00

Previous Balance \$592.00

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Payments

05/20/2022	Payment on Account - Thank you!	-592.00
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TOTAL BALANCE DUE	<u>\$1,872.00</u>
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