

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: July 7, 2022
Invoice #: 195230
Account #: IA.0156
RMC
Federal Tax I.D.: 42-0894999

RE: Estrada v. Iowa State Penitentiary
Claimant: Toribio J. Estrada
Employer: Iowa State Penitentiary
Dates of Loss: 6/10/20 & 1/5/21

Activity through 06/30/2022

Fees

			<u>Hours</u>	
05/09/2022	RMC	Receipt and initial review of new transmittal and pleadings, forwarded by Jon Bergman.	0.30	48.00
	RMC	Correspondence to Jennifer Hart requesting the State's Answers to Petitions when available.	0.10	16.00
	RMC	Receipt and review of the State's Answers to Claimant's three Petitions, forwarded by Sarah Timko.	0.20	32.00
	RMC	Preparation of Answer to Claimant's Petition relative to 6/10/20 date of injury.	0.30	48.00
	RMC	Preparation of Answer to Claimant's Petition relative to 1/5/21 date of injury.	0.30	48.00
	RMC	Preparation of Interrogatories directed to the claimant relative to both dates of injury.	0.20	32.00
	RMC	Preparation of Interrogatories directed to the State/Employer with regard to both dates of injury.	0.20	32.00
	RMC	Preparation of Requests for Production of Documents directed to the Claimant with regard to both dates of injury.	0.10	16.00
	RMC	Preparation of Requests for Production of Documents directed to the State/Employer with regard to both dates of injury.	0.10	16.00
	RMC	Correspondence to Niko Pothitakis regarding the Fund's Answers to Petitions and discovery requests to the claimant.	0.10	16.00

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			<u>Hours</u>	
	RMC	Correspondence to Jon Bergman regarding the Fund's Answers to Claimant's Petitions and service of discovery requests on the Claimant and State of Iowa.	0.10	16.00
05/17/2022	RMC	Receipt and review of Agreement for Outside Counsel forwarded by Jodi Watson.	0.10	16.00
	RMC	Correspondence to Jodi Watson regarding executed Agreement for Outside Counsel and request for fully-signed contract when available.	0.10	16.00
05/19/2022	RMC	Receipt and cursory review of the State's Interrogatories and Requests for Production of Documents directed to the claimant, served by Sarah Timko.	0.20	32.00
05/26/2022	RMC	Receipt and review of all medical records in claimant's possession, from eight different providers (519 pages), served by Niko Pothitakis.	0.30	48.00
06/01/2022	RMC	Receipt and review of fully-executed Agreement for Outside Counsel, forwarded by Jodi Watson.	0.10	16.00
06/07/2022	KJP	Prepare a medical chronology and index with medical records received Claimant's counsel, Nicholas Pothitakis, inclusive of provider University of Iowa Hospitals & Clinics, consisting of 180 pages.	2.80	252.00
06/09/2022	KJP	Prepare a medical chronology and index with medical records received Claimant's counsel, Nicholas Pothitakis, inclusive of provider Athletico Physical Therapy, consisting of 98 pages.	0.80	72.00
06/15/2022	RMC	Receipt and review of correspondence from Niko Pothitakis proposing 5/15/23 primary hearing.	0.10	16.00
06/20/2022	RMC	Receipt and review of correspondence from Sarah Timko confirming her availability for 5/15/23 hearing.	0.10	16.00
	RMC	Receipt and review of correspondence from Niko Pothitakis to the Division of Workers' Compensation formally requesting 5/15/23 hearing.	0.10	16.00
06/21/2022	RMC	Receipt and cursory review of claimant's Interrogatories, Requests for Production of Documents and Requests for Admissions directed to the State/Employer relative to all three dates of injury, served by Niko Pothitakis.	0.30	48.00
	RMC	Receipt and review of claimant's Interrogatories, Requests for Production of Documents and Requests for Admissions directed to the Second Injury Fund, relative to 6/10/20 and 1/5/21 injury dates, served by Niko Pothitakis.	0.30	48.00
06/22/2022	RMC	Cursory review of relevant file materials in preparation for responding to Claimant's Requests for Admissions.	0.20	32.00
	RMC	Preparation of Responses to Claimant's Requests for Admissions relative to 6/10/20 date of injury.	0.30	48.00
	RMC	Preparation of Responses to Claimant's Requests for Admissions relative to 1/5/21 date of injury.	0.20	32.00

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		<u>Hours</u>	
RMC	Receipt and review of Hearing Assignment Order entered by the Division of Workers' Compensation.	0.10	16.00
RMC	Update to overall file evaluation and information to document hearing date and all prehearing deadlines.	0.20	32.00
RMC	Correspondence to Jon Bergman regarding 5/15/23 primary workers' compensation hearing.	0.10	16.00
RMC	Receipt and review of the State's Response to Claimant's Requests for Admissions relative to 6/10/20 date of injury, served by Sarah Timko.	0.10	16.00
RMC	Receipt and review of the State's Response to Claimant's Requests for Admissions relative to 1/5/21 date of injury, served by Sarah Timko.	0.10	16.00
TOTAL FEES		8.60	1,124.00

	<u>Recapitulation</u>			
<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Ryan M. Clark	Partner	5.00	\$160.00	\$800.00
Kelly J. Pering	Paralegal	3.60	90.00	324.00

TOTAL THIS STATEMENT 1,124.00

TOTAL BALANCE DUE \$1,124.00