

**EXHIBIT A**  
**TO PLAINTIFF'S RESPONSE TO DEFENDANT'S OBJECTIONS**

**Haines/PRM Invoice**

Time:

DATE	DESCRIPTION	HOURS
4.24.12	Legal research regarding complaint, begin drafting complaint, conference with [client].	2.0
4.26.12	Legal Research regarding FOIA complaints, Conference with [client].	1.0
4.27.12	Legal Research regarding FOIA exemptions and litigation process (state law library), review samples.	3.0
5.2.12	Cite Check complaint (state law library)	2.0
5.3.12	Legal Research regarding remedies upon exhaustion of remedies, correspond with [client]	3.0
5.4.12	Legal Research, Exhaustion of Admin Remedies, Correspond with [client]	1.0
5.7.12	Revise Complaint, review sample complaints	2.0
5.11.12	Legal Research regarding FOIA exemptions 1, 3, 5	3.0
5.17.12	Review consultation with [outside counsel]. Call USDC clerk of court. Prepare Summons, Complaint, cover Sheet for filing, Review filing requirements.	3.0
5.18.12	Legal research regarding litigating exemptions 1, 3, 5	2.5
5.19.12	Legal research regarding litigating exemptions 1, 3, 5	2.0
5.21.12	Consultation with [outside counsel], review filings	2.0
5.22.12	Finalize Summons, Complaint, etc. Consult with [outside counsel], Conference with [client]. File complaint. File certificate of service.	4.0
7.2.12	Review Answer, research pretrial conference and 26f conference requirements	2.0
7.13.12	Conference with [client] regarding answer and settlement, Correspond with [counsel for defendant] re: settlement conference	.5
7.26.12	Conference with [counsel for defendant] to discuss 26f report and options for resolution; Research defendant's position of case; correspond with client regarding same	2.0

7.27.12	Research litigation considerations and local rules regarding discovery in FOIA cases	1.0
8.3.12	Review Draft 26f report. Correspond with [counsel for defendant] regarding Plaintiff's case, draft 26f revisions	2.5
8.4.12	Research discovery considerations, local rules and Fed Rules regarding 26f report and conference. Correspond with [client] regarding 26f report.	2.0
8.5.12	Draft Plaintiff's case narrative. Correspond with [counsel for defendant] and [client] regarding 26f meeting.	3.0
8.6.12	Prepare for and attend 26f meeting. Draft 26f report. Correspond with [counsel for defendant] and [client]. Review letter delivered by [counsel for defendant].	3.0
8.7.12	Finalize 26f report.	1.0
8.9.12	Draft settlement letter to Magistrate	2.0
8.13.12	Correspond with [counsel for defendant] regarding case and defendant representation. Legal research regarding same and discovery. Prepare for scheduling conference.	1.5
8.14.12	Attend scheduling conference with Magistrate and [counsel for defendant]. Conference with [client].	2.0
8.28.12	Conference with [client] regarding go-forward	.5
9.6.12/9.7.12	Consult with [outside counsel] regarding case	.5
9.17.12	Correspond with [counsel for defendant] regarding DOJ's request for stipulation	.5
9.18.12	Consult with [outside counsel] regarding case	.75
9.25.12	Review government's SJ brief. Review [client] notes regarding same. Draft memo to [client]. Consult with [outside counsel].	2.0
10.4.12	Prepare SJ response memo, research fees memo	2.0
10.5.12	Prepare SJ response memo, prepare fees argument	5.0
10.14.12	Conference with [client] regarding stipulation	0.5
10.15.12	Prepare stipulation agreement, correspond with [counsel for defendant].	3.0

10.16.12	Law library, legal research fees motion	3.0
10.17.12	Legal research regarding dismissal and fees, begin drafting fees motion	3.0
10.18.12	Draft joint stipulation and proposed order, correspond with [counsel for defendant] and [client] regarding same, file same	3.0
10.18.12	Fees motion research, writing	3.0
10.19.12	Fees motion research, writing	3.0
10.22.12	Fees motion research, writing	5.0
10.23.12	Fees motion research, writing	2.0
10.28.12	Finalize motion papers, review local and federal motion practice rules, correspond with chambers regarding procedural requirements of motion given the 10.26.12 Order, review Order, correspond with client regarding final documents	5.0
10.30.12	File Motion	1.0
Total at motion		95.75
12.3.12	Review Response Motion, Research and prepare to draft reply	3.0
12.11.12	Draft reply	7.0
12.12.12	Draft reply	6.0
12.14.12	Finalize and file reply	2.0
1.29.13	Review Order Granting Fees	[0]
2.14.13	Review Objections to Order, research 28USC626 and LR 72 and 7.1	2.0
2.14.13	Draft response to Objections	1.0
2.19.13	Draft response to Objections, conference with [client]	1.0
2.20.13	Draft response to Objections	2.0
2.22.13	Draft response to Objections, conference with [client]	7.0
2.23.13	Prepare documentation filing, Review Magistrate's Order and LR regarding filing requirements	1.0
2.25.13	Draft and finalize response to Objections, file.	5.0
Total (\$150/hr)		95.75 + 37 = 132.75 hours

Costs

DATE	DESCRIPTION	AMOUNT
5.22.12	USDC Filing Fee	\$350 (submitted)
Various	Mileage, Parking, Printing	(\$148.15, Not submitted)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

PUBLIC RECORD MEDIA, LLC,        )  
  )  
                                  Plaintiff,        )  
  )  
v.                                        )  
  )  
U.S. DEPARTMENT OF HEALTH        )  
AND HUMAN SERVICES,                )  
  )  
                                  Defendant        )  
\_\_\_\_\_ )

Case: 12-cv-03065-JRT-TNL

**Plaintiff's Letter Concerning  
Settlement**

Pursuant to the Order dated January 28, 2013 (Docket No. 11), Plaintiff respectfully submits this letter concerning settlement. Plaintiff filed this lawsuit because it seeks the production under FOIA of certain records previously and currently held by Defendant. In response to the suit, Defendant has begun its production of responsive records, and has indicated the existence of additional responsive records. In the parties' Joint 26(f) report (Docket No. 12), Defendant has indicated its intent to produce all or a significant portion of the responsive records by February 28, 2013, a deadline to which Plaintiff is amenable. The parties have discussed settlement, and have agreed that negotiations will be dependent in significant part on Defendant's remaining production. The parties have also discussed Plaintiff's expectation that responsibility under 5 U.S.C. § 552(a)(4)(E) for fees and costs incurred in this litigation will be a necessary component of its disposition. No settlement has been reached as of this letter. It does not appear that ADR would be of use at this time.

Date: February 20, 2013

Respectfully submitted,

/s/ JT Haines

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