

Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803,799,2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 August 27, 2018 Invoice 1876459 Page 1

Our Matter # 041294/01735 For Services Through 07/31/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

06/07/18 Review of complaint.

L.J. WARCO 1.30 hrs.

06/07/18 Review communications to Mr. Dyer in preparation for responding to his complaint.

M.K. BELL 0.60 hrs.

06/07/18 Review and assess correspondence sent to Plaintiff regarding his conduct at Board

meetings; review and assess Plaintiff's complaint

confer with Attorney Warco to

B.O. MOULARD 3.10 hrs.

06/14/18 Draft Notice of Removal, Notice of Notice of Removal to Plaintiff, and Notice of Notice of

Removal to the Fulton Superior Court; draft Motion to Dismiss; draft outline for arguments to include in brief in support of Motion to Dismiss; begin drafting brief in support of Motion to

Dismiss.

B.O. MOULARD 3.40 hrs.

07/05/18 Review removal papers.

L.J. WARCO 0.20 hrs.

07/05/18 Revise Notice of Removal, Notice of Notice of Removal to Plaintiff, and Notice of Notice of

Removal to Fulton Superior Court and prepare documents for filing and service.

B.O. MOULARD 0.70 hrs.

07/05/18 Research First Amendment law involving public comment sessions during community

meetings in preparation for drafting Motion to Dismiss.

M.K. BELL 1.50 hrs.

07/05/18 Review complaint in preparation for drafting motion to dismiss.

M.K. BELL 0.50 hrs.

07/09/18 Review and sign removal papers.

L.J. WARCO 0.50 hrs.

07/09/18 Continue to research First Amendment law involving public comment sessions during

community meetings in preparation for drafting Motion to Dismiss argument that APS's

restriction on Mr. Dyer's speech was not unconstitutional.

M.K. BELL 0.50 hrs.

August 27, 2018 Invoice 1876459 Page 2

07/10/18 Begin drafting portions of Motion to Dismiss relating to Plaintiff's due process and state-law claims. **B.O. MOULARD** 3.00 hrs. Review commonly-cited Supreme Court cases involving restrictions on speech; research 07/10/18 First Amendment case law involving restrictions on profane speech in preparation for drafting argument that APS is entitled to restrict Mr. Dyer's profane speech; search for case law involving a restriction of profane speech during a public comment session to use in First Amendment section of Motion to Dismiss. M.K. BELL 3.30 hrs. 07/11/18 Continue drafting portions of Motion to Dismiss relating to Plaintiff's due process and statelaw claims. **B.O. MOULARD** 2.30 hrs. 07/11/18 Continue researching case law involving restrictions on profane or abusive speech for use in argument that APS was entitled to restrict Mr. Dyer's speech; research case law governing prior restraints on speech to incorporate into argument. M.K. BELL 1.50 hrs. Conduct research regarding whether attending a public Board meeting is a protected 07/12/18 property right; complete section of Motion to Dismiss relating to Plaintiff's due process claims; confer with Attorney Bell regarding continue drafting portion of Motion to Dismiss relating to Plaintiff state law claims. B.O. MOULARD 6.90 hrs. 07/12/18 Complete research needed for First Amendment section of Motion to Dismiss by searching for cases involving bans from public meetings, restrictions on racist speech, content-neutral restrictions; and the requirements of a time-place and manner restriction; correspond with Attorney Moulard regarding M.K. BELL 3.50 hrs. 07/12/18 Begin drafting Motion to Dismiss argument that any restriction on Mr. Dyer's speech did not violate his First Amendment rights. M.K. BELL 2.40 hrs. 07/13/18 Continue drafting portion of Motion to Dismiss relating to Plaintiff's state-law claims. **B.O. MOULARD** 07/13/18 Draft Statement of Facts section of Motion to Dismiss; draft First Amendment argument section of Motion to Dismiss, including arguments that Mr. Dyer's speech was not covered by the First Amendment and that APS's restriction on Mr. Dyer's speech met each of the elements of being a reasonable time, place, and manner restriction. M.K. BELL 6.70 hrs. Complete portions of Motion to Dismiss relating to Plaintiff discrimination, harassment, and 07/14/18 retaliation claims, sovereign immunity, and Plaintiff's First Amendment claims; email communications with Attorney Bell to **B.O. MOULARD** 3.30 hrs. 07/16/18 Edit second draft of portion of motion to dismiss brief relating to Plaintiff's First Amendment Claim; draft introduction to the brief; draft section concerning the timeliness of Plaintiff's claims; review and edit first full draft of the brief. B.O. MOULARD 5.30 hrs.

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Atlanta Public Schools

August 27, 2018 Invoice 1876459 Page 3

07/16/18	Revise First Amendment portion of Motion to Dismiss by reducing the length of the argument; draft road map of the First Amendment section; delete unnecessary legal citations.  M.K. BELL  2.50 hrs.			
07/16/18	Make final revisions to First Amendment section of the Motion to D for errors and prepare for filing.  M.K. BELL	ismiss; review	entire brief	
07/19/18	Determine next steps in responding to litigation. M.K. BELL	0.10 hrs.		
07/24/18	Review and assess order reassigning case to a new judge. B.O. MOULARD	0.10 hrs.		
Fees for Le	gal Services		\$14,547.50	
	CHARGES FOR OTHER SERVICES PROVIDED/EXPENSES I	<u>NCURRED</u>		
07/06/2018 07/10/2018	Westlaw VENDOR: Moulard, Brandon O. INVOICE#: 261483410710020 DATE: 7/9/2018 - Filing Fees 07/09/18 Filing of Notice of Ren with US District Court for the Northern District of GA		22.61 400.00	
07/10/2018	VENDOR: Moulard, Brandon O. INVOICE#: 261483410710020 DATE: 7/9/2018 - Filing Fees 07/09/18 Filing of Notice of Filin with Fulton Superior		7.23	
07/12/2018 Total Char	Westlaw ges for Other Services Provided/Expenses Incurred		22.61 <b>\$452.45</b>	
·	DISBURSEMENT SUMMARY			
Description Filing Fee Westlaw TOTAL		<u>Dollars</u> 407.23 45.22 \$452.45		
TOTAL FOR THIS INVOICE			\$14,999.95	

August 27, 2018 Invoice 1876459 Page 4

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 07/31/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$14,547.50

Charges for Other Services Provided/Expenses Incurred \$452.45

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611 (Only if required, in addition to SWIFT

Code FICOUS44, use ABA 061100606).



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Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303

M.K. BELL

September 25, 2018 Invoice 1887052 Page 1

0.70 hrs.

Our Matter # 041294/01735 For Services Through 08/31/18 APS Litigation Name of Matter: Dyer, Nathaniel (Litigation) 08/08/18 Confer with Attorney Warco regarding **B.O. MOULARD** 0.10 hrs. 08/08/18 Review Superior Court rules governing response to Complaint and response to Motion to Dismiss; confer with Attorney Moulard to M.K. BELL 0.20 hrs. 08/09/18 Review and assess notice of submission of Motion to Dismiss to the judge; review and assess Show Cause Order issued to Plaintiff; confer with Attorneys Warco and Bell regarding B.O. MOULARD 0.30 hrs. Begin drafting Initial Disclosures and initial draft of Joint Preliminary Report and Discovery 08/14/18 **B.O. MOULARD** 1.80 hrs. 08/15/18 Review and assess Plaintiff's response to the Show Cause Order; review and assess Plaintiff's response to Motion to Dismiss and formulate preliminary arguments for reply brief. **B.O. MOULARD** 1.50 hrs. 08/16/18 Conduct research to evaluate cases cited by Plaintiff in response to the arguments for dismissal of his due process claim. B.O. MOULARD 1.20 hrs. 08/17/18 Begin drafting portions of reply in support of Motion to Dismiss relating to Plaintiff's state law and due process claims. B.O. MOULARD 4.00 hrs. Begin review of Plaintiff's brief in response to Defendant's Motion to Dismiss. 08/20/18 M.K. BELL Begin drafting portion of reply in support of Motion to Dismiss relating to Plaintiff's due 08/21/18 process claims. **B.O. MOULARD** 2.00 hrs. 08/21/18 Continue to review arguments made in Plaintiff's brief in Response to Defendant's Motion to Dismiss.

September 25, 2018 Invoice 1887052 Page 2

08/22/18			
	M.K. BELL	0.50 hrs.	
08/22/18	Draft outline of arguments to present in Defendant's Reply Brief; corresponse to Defendant's Motion to Dismiss to arguments presented Dismiss.		
	M.K. BELL	1.70 hrs.	
08/23/18	Confer with Attorney Moulard and Attorney Warco to		
	M.K. BELL	0.20 hrs.	
08/24/18	Begin drafting portion of reply in support of Motion to Dismiss relating Plaintiff's claims.	ng to the timeliness of	
	B.O. MOULARD	1.60 hrs.	
08/26/18	Review cases cited by Plaintiff in his brief in response to Defendant determine	s' Motion to Dismiss and	
	M.K. BELL	1.50 hrs.	
08/27/18	Continue to review cases cited by Plaintiff in his brief in response to Dismiss.	Defendant's Motion to	
	M.K. BELL	0.20 hrs.	
08/27/18	Conduct research regarding the "discovery rule" regarding suspens limitations; draft portion of reply brief relating to the timeliness of Pla B.O. MOULARD		
08/28/18	Compare facts alleged in Complaint to facts alleged in Plaintiff's Remotion to Dismiss to determine whether Plaintiff added new facts.	sponse to Defendants'	
	M.K. BELL	0.50 hrs.	
08/28/18	Draft section of brief arguing that the restriction on Plaintiff's speech draft section of brief arguing that Plaintiff had adequate alternative of communication to convey his message.	channels of	
	M.K. BELL	3.90 hrs.	
08/28/18	Research Local Rule setting page limit for response to a motion to cargument that Plaintiff exceeded that page limit; research case law disruptive speakers from public meetings; research "fighting words" Plaintiff in his response brief.	involving banning	
	M.K. BELL	4.80 hrs.	
08/28/18	Draft section arguing the restrictions on Plaintiff's speech were cont based on other case law, AISS did not violate Plaintiff's First Amend him from public comment session.		
	M.K. BELL	4.00 hrs.	
08/28/18	Complete portions of reply in support of Motion to Dismiss relating to claims and the timeliness of his First Amendment claims; confer with		
	B.O. MOULARD	5.10 hrs.	
08/28/18	Conduct research regarding whether a pro se plaintiff may amend he through a response to a motion to dismiss	is or her pleading	
	through a response to a motion to dismiss.  B.O. MOULARD	1.30 hrs.	

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Atlanta Public Schools

September 25, 2018 Invoice 1887052 Page 3

08/29/18	Review and revise entire brief in preparation for filing. M.K. BELL	1.10 hrs.
08/29/18	Review and revise First Amendment argument within Reply Brief; re Defendant was entitled to restrict Plaintiff's speech as a result of his M.K. BELL	
08/29/18	Continue drafting section arguing the restrictions on Plaintiff's spee and that based on other case law, AISS did not violate Plaintiff's Fir removing him from public comment session.  M.K. BELL	
08/29/18	Review and edit First Amendment section of reply in support of Mot by Attorney Bell. B.O. MOULARD	otion to Dismiss prepared 1.40 hrs.
08/29/18	Conduct research regarding whether the First Amendment creates interest; supplement portion of reply brief relating to Plaintiff's due portion of reply brief relating to Plaintiff's state law claims; review ar brief.  B.O. MOULARD	process claim; complete
08/30/18	Begin drafting Answer, Initial Disclosures, and Joint Preliminary Re B.O. MOULARD	eport and Discovery Plan. 2.70 hrs.
Fees for L	egal Services	\$13,712.50
TOTAL FO	R THIS INVOICE	\$13,712.50

September 25, 2018 Invoice 1887052 Page 4

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 08/31/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$13,712.50

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary: Nelson Mulli

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611

(Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803,799,2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 October 12, 2018 Invoice 1894244 Page 1

For Services Through 09/30/18 Our Matter # 041294/01735 APS Litigation Name of Matter: Dyer, Nathaniel (Litigation) 08/15/18 Conference regarding L.J. WARCO 0.40 hrs. 08/29/18 Discuss L.J. WARCO 1.50 hrs. 09/18/18 Discuss with Attorney Brock and Attorney Moulard. L.J. WARCO 0.50 hrs. Review and assess Plaintiff's Surreply in opposition to Motion to Dismiss; conduct research 09/18/18 regarding moving to strike/exclude Plaintiff's brief; confer with Attorney Bell **B.O. MOULARD** 2.00 hrs. Review Entry of Appearance and ensure it is filed with Court. 09/18/18 M.K. BELL 0.30 hrs. 09/20/18 Email communications with Judge Batten's deputy clerk regarding opposing Plaintiff's recently filed brief. B.O. MOULARD 0.20 hrs. 09/20/18 Review and edit Motion to Disregard Plaintiff's Surreply drafted by Attorney Bell. **B.O. MOULARD** 0.50 hrs. Review Plaintiff's Surreply; research applicable law regarding filing of surreplies; draft 09/20/18 Defendant's Motion for Court to Disregard Plaintiff's Surreply. M.K. BELL 2.60 hrs. 09/21/18 Review and edit second draft of Motion to Disregard Plaintiff's Surreply and prepare it for **B.O. MOULARD** 0.30 hrs. 09/21/18 Revise Defendant's Motion for Court to Disregard Plaintiff's Surreply and prepare for filing. M.K. BELL 0.30 hrs. Fees for Legal Services ..... \$2,285.00

## Case 1:18-cv-03284-TCB Document 51-2 Filed 01/21/20 Page 10 of 45

Atlanta Public Schools

October 12, 2018 Invoice 1894244 Page 2

TOTAL FOR THIS INVOICE.......\$2,285.00

October 12, 2018 Invoice 1894244 Page 3

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 09/30/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$2,285.00

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA **SWIFT Code:** FICOUS44

**Beneficiary Account:** 1002720611 (Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

041294/01735

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303

Our Matter #

November 12, 2018 Invoice 1905345 Page 1

For Services Through 10/31/18

APS Name of Ma	atter:	Litigation  Dyer, Nathaniel (Litigation)		
Name of Me	atter.	Dyer, Nathanier (Enganon)		
10/05/18	Review case fi prepare summ B.O. MOULAR		, and upcoming action items to 0.40 hrs.	)
10/15/18	Discuss L.J. WARCO	with Attorney Moulard.	0.20 hrs.	
10/15/18	File Surreply; of	sess Plaintiff's Motion for Leave to File Out of conduct research to evaluate arguments for a uses to both motions. D		o
10/15/18	Communication M.K. BELL	n regarding	0.10 hrs.	
10/29/18	Surreply; draft	rch and draft response in opposition to Plain response to Plaintiff's Motion to Allow Late F prepare the same for filing. D		of
Fees for Le	egal Services		\$2,417	'.50
TOTAL FO	R THIS INVOICE		\$2,417	'. <b>5</b> 0

November 12, 2018 Invoice 1905345 Page 2

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 10/31/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$2,417.50

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

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Birmingham, Alabama, USA **SWIFT Code:** FICOUS44 **Beneficiary Account:** 1002720611 (Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803,799,2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 December 17, 2018 Invoice 1917509 Page 1

Our Matter # 041294/01735 For Services Through 11/30/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

11/16/18 Review and assess Plaintiff's Notice of Withdrawal of Surreply, Amended Response to

Motion to Dismiss, and other filings.

B.O. MOULARD 0.40 hrs.

11/16/18 Communications regarding .

M.K. BELL 0.10 hrs.

11/26/18 Review Plaintiff's recent filings to determine

M.K. BELL 1.00 hrs.

11/29/18 Begin drafting District's response to Plaintiff's Amended Response to Defendant's Motion to

Dismiss.

M.K. BELL 0.20 hrs.

11/30/18 Continue drafting Notice of Objection to Plaintiff's Amended Response to Defendant's Motion

to Dismiss.

M.K. BELL 1.90 hrs.

11/30/18 Review and edit first draft of Notice of Objection to Plaintiff's Amended Response to AISS's

Motion to Dismiss and prepare the same for filing.

B.O. MOULARD 1.10 hrs.

Fees for Legal Services \$1,212.50

## CHARGES FOR OTHER SERVICES PROVIDED/EXPENSES INCURRED

11/01/2018 VENDOR: PACER Service Center; INVOICE#: 4310666-Q32018; 5.10

DATE: 11/1/2018 - Quarterly Billing: 07/01/2018 to 09/30/2018

### DISBURSEMENT SUMMARY

<u>Description</u>	<u>Dollars</u>
Court Fees	5.10
TOTAL	\$5.10

## Case 1:18-cv-03284-TCB Document 51-2 Filed 01/21/20 Page 15 of 45

Atlanta Public Schools

December 17, 2018 Invoice 1917509 Page 2

December 17, 2018 Invoice 1917509 Page 3

## **REMITTANCE COPY**

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 11/30/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$1,212.50

Charges for Other Services Provided/Expenses Incurred \$5.10

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 10027

**Beneficiary Account:** 1002720611 (Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 January 17, 2019 Invoice 1926253 Page 1

\$385.00

Our Matter APS Name of Ma		041294/01735 Litigation Dyer, Nathaniel (Litigation)	For Services Th	ough 12/31/18
11/16/18	Review of late L.J. WARCO	st filings.	0.20 hrs.	
11/26/18	Review of ema L.J. WARCO	ails regarding	0.30 hrs.	l.
12/13/18	Review and as Objection; B.O. MOULAR		ave and proposed response to APS 0.70 hrs.	S's Notice of
12/13/18	Emails with At L.J. WARCO	torney Moulard regarding	0.20 hrs.	
Fees for Le	egal Services			\$385.00

TOTAL FOR THIS INVOICE.....

January 17, 2019 Invoice 1926253 Page 2

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 12/31/18

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$385.00

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

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Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611 (Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law Tax ID No. 57-0215445 Post Office Box 11070 / Columbia, South Carolina 29211 Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303

March 21, 2019 Invoice 1947495 Page 1

Our Matter # 041294/01735 For Services Through 02/28/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

02/01/19	Telephone conference with Attorney Warco regarding .		
	B.O. MOULARD	0.20 hrs.	
02/01/19	Emails Attorney Moulard regarding	and telephone	call with
	L.J. WARCO	0.40 hrs.	
02/11/19	Review matter to update audit response. M.K. BELL	0.20 hrs.	
Fees for Le	egal Services		\$215.00
	CHARGES FOR OTHER SERVICES PROVIDED/EXPI	ENSES INCURRED	
02/11/2019	VENDOR: PACER Service Center; INVOICE#: 431066 DATE: 2/11/2019 - Quarterly billing: 10/01/2018 to 12	•	3.40
Total Char	ges for Other Services Provided/Expenses Incurred		\$3.40
	DISBURSEMENT SUMMARY		
Description Court Fees		<u>Dollars</u> 3.40	
TOTAL	-	\$3.40	
TOTAL FO	R THIS INVOICE		\$218.40

March 21, 2019 Invoice 1947495 Page 2

## **REMITTANCE COPY**

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Nelson Mullins Riley & Scarborough LLP

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 02/28/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$215.00

Charges for Other Services Provided/Expenses Incurred \$3.40

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611

(Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 April 19, 2019 Invoice 1957196 Page 1

\$835.00

\$835.00

Our Matter # APS Name of Ma		041294/01735 Litigation Dyer, Nathaniel (Litigation)	For Services Through 03/31/19
03/14/19	Emails regardi L.J. WARCO	ng .	0.50 hrs.
03/14/19		sess order on Motion to Dismiss; prepare sum	nmary of the order; confer with
	Attorney Gupta B.O. MOULAR	<del>-</del> -	1.50 hrs.
03/14/19	Review Order M.K. BELL	on Motion to Dismiss.	0.10 hrs.
03/15/19	Review of info	mation and plan for next steps in light of court	order. 0.50 hrs.
03/27/19 Draft letter to Plaintiff to discuss obligation to discovery plan.		Plaintiff to discuss obligation to confer and crea	ate joint preliminary report and
	B.O. MOULAR		0.40 hrs.

Fees for Legal Services.....

TOTAL FOR THIS INVOICE.....

April 19, 2019 Invoice 1957196 Page 2

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Nelson Mullins Riley & Scarborough LLP

Post Office Drawer 11009 Columbia, South Carolina 29211 Telephone (803) 799-2000 accounts.receivable@nelsonmullins.com

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 03/31/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$835.00

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary: Nelson Mullins Riley &

Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA **SWIFT Code:** FICOUS44 **Beneficiary Account:** 1002720611 (Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 May 21, 2019 Invoice 1967333 Page 1

Our Matter # 041294/01735 For Services Through 04/30/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

04/02/19	Confer with Attorney Bell to discuss B.O. MOULARD	0.20 hrs.
04/04/19	Develop affirmative defenses for Answer to Complaint. B.O. MOULARD	0.80 hrs.
04/04/19	Prepare answer to complaint. L.J. WARCO	2.70 hrs.
04/04/19	Review Plaintiff's exhibits to determine	
	Joint Preliminary Report.  M.K. BELL	0.50 hrs.
04/05/19		lard and Attorney Brock
	and emails regarding	0.90 hrs.
04/05/19	Telephone conference with Plaintiff regarding preparation of joint p	reliminary report and
	related issues. B.O. MOULARD	0.30 hrs.
04/07/19	Prepare memo to Mr. Esteves and Dr. Carstarphen regarding	
	L.J. WARCO	1.90 hrs.
04/08/19	Review memo regarding with A	ttorney Warco regarding
	B.O. MOULARD	0.20 hrs.
04/08/19	Begin drafting Joint Preliminary Report in preparation for sending a M.K. BELL	draft to Mr. Dyer. 0.20 hrs.
04/08/19	Begin drafting the District's Initial Disclosures. M.K. BELL	0.20 hrs.
04/09/19	Review Court's Order on AISS's Motion to Dismiss in preparation for Preliminary Report; finalize drafting Joint Preliminary Report to sen	

Atlanta Put	olic Schools	May 21, 2019 Invoice 1967333 Page 2
	M.K. BELL	2.90 hrs.
04/10/19	Review of draft discovery plan. L.J. WARCO	0.30 hrs.
04/10/19	Review and edit first draft of Joint Preliminary Report and Discover Attorney Bell.	
	B.O. MOULARD	0.40 hrs.
04/10/19	Revise Joint Preliminary Report before sending to Mr. Dyer for rev M.K. BELL	iew. 0.30 hrs.
04/11/19	Emails regarding	0.30 hrs.
04/11/19	Continue drafting AISS's Initial Disclosures. M.K. BELL	0.70 hrs.
04/12/19	Emails regarding	0.30 hrs.
04/12/19	Emails with Plaintiff regarding edits to Joint Preliminary Report and B.O. MOULARD	d Discovery Plan. 0.10 hrs.
04/12/19	Draft the list of potential witnesses, list of potential evidence, and a sections of AISS's Initial Disclosures.  M.K. BELL	applicable case law 1.30 hrs.
04/15/19	Review edits proposed by Mr. Dyer to joint scheduling plan. L.J. WARCO	0.40 hrs.
04/15/19	Review and assess Plaintiff's proposed revisions to the Joint Prelir Discovery Plan. B.O. MOULARD	minary Report and
04/16/19		0.101113.
04/10/19	Emails regarding L.J. WARCO	0.40 hrs.
04/16/19	Review Mr. Dyer's proposed revisions to the Joint Preliminary Rep regarding same.	ort and communications
	M.K. BELL	0.20 hrs.
04/19/19	Emails	0.20 hrs.
04/22/19	Conference call to discuss	0.40 hrs.
04/22/19	Prepare for and attend 26(f) conference. B.O. MOULARD	0.70 hrs.
04/22/19	Participate in Rule 26(f) conference with Mr. Dyer to discuss the Joand likelihood of settlement. M.K. BELL	•
04/00/40		0.50 hrs.
04/22/19	Revise Joint Preliminary Report based on agreement during Rule 2 M.K. BELL	26(f) conference. 0.20 hrs.

## Case 1:18-cv-03284-TCB Document 51-2 Filed 01/21/20 Page 25 of 45

Atlanta Public Schools

May 21, 2019 Invoice 1967333 Page 3

04/02/40	Devices and edit first draft of initial displacemen		
04/23/19	Review and edit first draft of initial disclosures.  B.O. MOULARD	0.30 hrs.	
04/24/19	Communications with Mr. Dyer regarding revisions to Joint Preliminary Report as discussed during Rule 26(f) conference.		discussed
	M.K. BELL	0.20 hrs.	
04/25/19	Communications with Mr. Dyer regarding filing of Joint Preliminary I M.K. BELL	Report. 0.10 hrs.	
	W.R. DELL	0.101115.	
04/26/19	Prepare Joint Preliminary Report for filing. M.K. BELL	0.10 hrs.	
	W.N. DLLL	0.101113.	
Total Fees for Legal Services			\$4,847.50
TOTAL FOR THIS INVOICE			

May 21, 2019 Invoice 1967333 Page 4

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 04/30/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$4,847.50

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD) Transfer

Beneficiary: Nelson Mullins Riley &

Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611 (Only if required in addition to SWIF)

(Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law Tax ID No. 57-0215445 Post Office Box 11070 / Columbia, South Carolina 29211 Tel: 803.799.2000

041294/01735

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303

Our Matter #

June 19, 2019 Invoice 1978049 Page 1

For Services Through 05/31/19

APS	$\pi$	Litigation	TO Services Tillou	gii 03/3 i/ 13
Name of Ma	atter:	Dyer, Nathaniel (Litigation)		
05/02/19	Review and as B.O. MOULAR	ssess case management order. RD	0.20 hrs.	
05/06/19	Revise Initial D M.K. BELL	Disclosures; draft Rule 5.4 Certificate of Serv	vice; prepare to file. 1.20 hrs.	
05/22/19	Begin drafting B.O. MOULAR	APS's Initial Disclosures. RD	1.50 hrs.	
05/23/19	Review and as B.O. MOULAR	ssess Plaintiff's Initial Disclosures and attach	ned documents. 0.50 hrs.	
05/30/19	Review case f	ile to determine		
	B.O. MOULAF	RD .	0.40 hrs.	
Total Fees for Legal Services		\$1,015.00		
TOTAL FO	R THIS INVOIC	E		\$1,015.00

June 19, 2019 Invoice 1978049 Page 2

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 05/31/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$1,015.00

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD)
Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611

(Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 July 30, 2019 Invoice 1992147 Page 1

Our Matter APS Name of M		041294/01735 Litigation Dyer, Nathaniel (Litigation)	For Services Through 06/30/19	9
06/28/19	Review Plainti M.K. BELL	iff's Initial Disclosures in preparation for draftin	g discovery requests to Plaintiff. 0.20 hrs.	
06/30/19	0/19 Begin drafting Defendant's First Interrogatories, Requests for Admissions, and Re Production of Documents to Plaintiff. M.K. BELL 2.10 hrs.		•	
Total Fees	for Legal Serv	ices	\$575.00	)
TOTAL FOR THIS INVOICE			\$575.00	0

July 30, 2019 Invoice 1992147 Page 2

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 06/30/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$575.00

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD)
Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611 (Only if required, in addition to SWIFT

Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 August 27, 2019 Invoice 2002610 Page 1

\$1,445.00

Our Matter # For Services Through 07/31/19 041294/01735 APS Litigation Name of Matter: Dyer, Nathaniel (Litigation) 07/01/19 Continue drafting and finalize Defendant's First Interrogatories, Requests for Admission, and Requests for Production of Documents to Plaintiff; review Plaintiff's Initial Disclosures, documents Plaintiff produced pursuant to his Initial Disclosures, Complaint, Order on Motion to Dismiss, for purposes of drafting discovery requests. M.K. BELL 4.90 hrs. 07/10/19 Edit and supplement first draft of interrogatories to Plaintiff. B.O. MOULARD 0.80 hrs. Total Fees for Legal Services ..... \$1,445.00

TOTAL FOR THIS INVOICE.....

August 27, 2019 Invoice 2002610 Page 2

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 07/31/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$1,445.00

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD)
Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44

**Beneficiary Account:** 1002720611 (Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 September 10, 2019 Invoice 2007029 Page 1

Our Matter # APS Name of Matter:		041294/01735 Litigation Dyer, Nathaniel (Litigation)	For Services Through 08/31/19
08/08/19	Emails with At L.J. WARCO	torney Moulard regarding	0.40 hrs.
08/08/19 Review and edit requests for production of documer email to Plaintiff regarding discovery; telephone con discovery period.		iff regarding discovery; telephone	
	B.O. MOULAF		0.60 hrs.
08/12/19	Emails regard	ing	hrs.
08/15/19	Emails regard	ing .	0.50 hrs.
08/19/19	Begin preparir B.O. MOULAF	ng cross-examination outline for PI RD	aintiff's deposition. 1.70 hrs.
08/23/19	Corresponden M.K. BELL	ce with Mr. Dyer regarding his rec	eipt of amended notice of deposition. 0.20 hrs.
08/26/19	Continue prep B.O. MOULAF	aration for Plaintiff's deposition. RD	1.60 hrs.
08/26/19	Emails regard	ing	0.50 hrs.
08/28/19		ntiff's previous racially insensitive	Plaintiff's deposition; conduct research public statements and artwork. 2.10 hrs.
08/28/19	Emails regard L.J. WARCO	ing	0.20 hrs.
08/30/19	Telephone cor	nversation with Attorney Moulard r	egarding
	L.J. WARCO		1.20 hrs.

## Case 1:18-cv-03284-TCB Document 51-2 Filed 01/21/20 Page 34 of 45

Atlanta Public Schools

September 10, 2019 Invoice 2007029 Page 2

08/30/19	30/19 Communications to and summarize videos that Plaintiff provided with his Initial Disclosures and sum same in preparation for deposition.  M.K. BELL 1.60 hrs.		
Total Fees	for Legal Services	\$2,952.50	
TOTAL FO	R THIS INVOICE	\$2,952.50	

September 10, 2019 Invoice 2007029 Page 3

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 08/31/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$2,952.50

Charges for Other Services Provided/Expenses Incurred \$0.00

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD)
Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611 (Only if required in addition to SWIF)

(Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

041294/01735

Litigation

**B.O. MOULARD** 

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303

Our Matter #

APS

October 21, 2019 Invoice 2024520 Page 1

For Services Through 09/30/19

2.60 hrs.

Name of Matter: Dyer, Nathaniel (Litigation) 09/01/19 Complete cross-examination outline for Plaintiff's deposition. B.O. MOULARD 4.60 hrs. 09/02/19 Supplement cross-examination outline and identify and gather deposition exhibits. B.O. MOULARD 1.20 hrs. Prepare for and attend deposition. 09/03/19 L.J. WARCO 4.40 hrs. 09/03/19 Take deposition of Plaintiff. **B.O. MOULARD** 4.60 hrs. 09/04/19 Emails regarding L.J. WARCO 0.20 hrs. 09/04/19 Conduct research regarding First Amendment case for use in motion for summary judgment. B.O. MOULARD 2.00 hrs. 09/06/19 Begin drafting Motion for Summary Judgment and Statement of Material Facts. B.O. MOULARD 2.30 hrs. Begin review and assessment of deposition of Mr. Nathaniel Dyer. 09/09/19 B.O. MOULARD 1.70 hrs. Complete review and assessment of Plaintiff's deposition. 09/10/19 B.O. MOULARD 1.20 hrs. 09/12/19 Continue preparation of statement of material facts and summary judgment brief. B.O. MOULARD 2.00 hrs. Continue drafting Motion for Summary Judgment and Statement of Material Facts. 09/18/19 **B.O. MOULARD** 1.40 hrs. 09/20/19 Review and assess Plaintiff's responses to APS's discovery requests; conduct research regarding case law to support APS's Motion for Summary Judgment.

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<b>Atlanta</b>	Public	: Schools	
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Atlanta Put	onc Schools		ober 21, 2019 4520 Page 2	
09/20/19	Conference regarding	0.40 hrs.		
09/25/19	Continue drafting brief in support of Motion for Summary Judgment B.O. MOULARD	t. 1.40 hrs.		
09/27/19	Review case law from other circuits regarding the constitutionality of from a public meeting based on offensive language for purposes of Motion for Summary Judgment; incorporate research findings into the B.O. MOULARD	f draft brief in		
09/29/19	Conduct additional research regarding case law in other jurisdiction individuals from public meetings for purposes of drafting brief in su Summary Judgment.  B.O. MOULARD			
09/30/19	Complete incorporating relevant portions of Plaintiff's deposition into Material Facts in support of Motion for Summary Judgment. B.O. MOULARD	to the Statem	ent of	
09/30/19	Discuss with Attorney Moulard. L.J. WARCO	0.30 hrs.		
Total Fees	for Legal Services		\$10,037.50	
	CHARGES FOR OTHER SERVICES PROVIDED/EXPENSES II	NCURRED		
09/10/2019 09/29/2019 <b>Total Char</b>	DATE: 9/6/2019 - 09/06/19 - Deposition of Nate Dyer		1,768.78 95.57 <b>\$1,864.35</b>	
DISBURSEMENT SUMMARY				
Description Court Repo Westlaw TOTAL	rters	Dollars 1,768.78 95.57 \$1,864.35		
TOTAL FOR THIS INVOICE			\$11,901.85	

October 21, 2019 Invoice 2024520 Page 3

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 09/30/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$10,037.50

Charges for Other Services Provided/Expenses Incurred \$1,864.35

TOTAL FOR THIS INVOICE .......\$11,901.85

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD)
Transfer

Beneficiary: Nelson Mullins Riley &

Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA SWIFT Code: FICOUS44 Beneficiary Account: 1002720611 (Only if required in addition to SWIF)

(Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 November 8, 2019 Invoice 2030961 Page 1

Our Matter # 041294/01735 For Services Through 10/31/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

10/01/19 Complete first draft of Statement of Material Facts; continue drafting brief in support of

Motion for Summary Judgment.

B.O. MOULARD 3.80 hrs.

10/01/19 Draft update to audit letter regarding recent events in litigation.

M.K. BELL 0.20 hrs.

10/02/19 Conduct research regarding the criteria for narrowly-tailored restrictions on speech; conduct research regarding constitutionally adequate, alternative means of communication; complete First Amendment section of brief in support of Motion for Summary Judgment; begin drafting portion of brief relating to Plaintiff's due process claim; supplement first draft of Statement of

Material Facts to add new factual assertions; prepare Declaration of David Jernigan to support Motion for Summary Judgment.

B.O. MOULARD 9.10 hrs.

10/03/19 Review the court's standing order to ensure summary-judgment filings comply with all form

and content specifications and modify brief and Statement of Material Facts accordingly; complete procedural due process portion of summary judgment brief; draft introduction and conclusion sections for the brief; revise declaration of Mr. David Jernigan per Mr. Jernigan's suggestions; verify all citations in Statement of Material Facts and brief; prepare summary-

judgment packet for filing.

B.O. MOULARD 4.20 hrs.

10/03/19 Review procedural history and draft procedural history section of brief in support of Motion

for Summary Judgment.

M.K. BELL 1.50 hrs.

10/07/19 Conduct research regarding whether Federal Rule 68 permits recover of attorneys fees in

actions under 42 USC 1983.

B.O. MOULARD 1.20 hrs.

10/29/19 Review and assess Plaintiff's response to Motion for Summary Judgment, response to

Statement of Material Facts, and Cross-Motion for Summary Judgment and related filings; conduct research regarding Plaintiff's arguments; prepare outline of arguments for reply brief; conduct research regarding procedural issues and the timeliness of Plaintiff's Cross-

Motion for Summary Judgment.

B.O. MOULARD 2.70 hrs.

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November 8, 2019 Invoice 2030961 Page 2

10/30/19	Begin drafting reply in support of Statement of Material Facts.		
		1.50 hrs.	
10/30/19	/19 Develop strategy for drafting response to Plaintiff's Cross-motion for Summary Judgment and Response to APS's Motion for Summary Judgment.		
	,	0.20 hrs.	
10/31/19	Conduct research to assess Plaintiff's compliance with procedural re responding to APS's Motion for Summary Judgment and cross-movin judgment.	ng for summary	
	B.O. MOULARD	0.40 hrs.	
Total Fees	for Legal Services	\$6,772.50	
	CHARGES FOR OTHER SERVICES PROVIDED/EXPENSES INC	CURRED	
10/01/2019	Westlaw	108.68	
10/02/2019	Westlaw	337.63	
10/03/2019	Westlaw	61.37	
10/07/2019	Westlaw	27.17	
10/13/2019	Westlaw	135.85	
Total Char	ges for Other Services Provided/Expenses Incurred	\$670.70	
	DISBURSEMENT SUMMARY		
Description		Dollars	
Westlaw		670.70	
TOTAL		\$670.70	
TOTAL FOR THIS INVOICE\$7,443.2			

November 8, 2019 Invoice 2030961 Page 3

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Nelson Mullins Riley & Scarborough LLP

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Atlanta Public Schools ATTN: Skye Duckett 130 Trinity Avenue, SW Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 10/31/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$6,772.50

Charges for Other Services Provided/Expenses Incurred \$670.70

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD)
Transfer

Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201 Beneficiary Bank:

Synovus Bank (formerly NBSC, a division of Synovus Bank)

1148 Broadway Columbus, GA 31901

ABA/Routing Number: 061100606 Beneficiary Account: 1002720611 Beneficiary:

Nelson Mullins Riley & Scarborough, LLP 1320 Main Street Columbia, SC 29201

Beneficiary Bank: Synovus Bank

Birmingham, Alabama, USA **SWIFT Code:** FICOUS44 **Beneficiary Account:** 1002720611 (Only if required, in addition to SWIFT Code FICOUS44, use ABA 061100606).



Attorneys and Counselors at Law
Tax ID No. 57-0215445
Post Office Box 11070 / Columbia, South Carolina 29211
Tel: 803.799.2000

041294/01735

Atlanta Public Schools ATTN: Lisa Bracken 130 Trinity Avenue Atlanta, GA 30303

Our Matter #

December 13, 2019 Invoice 2043837 Page 1

For Services Through 11/30/19

APS Litigation Name of Matter: Dyer, Nathaniel (Litigation) 10/02/19 Review and comment on statement of material undisputed facts and work to obtain affidavits. L.J. WARCO 1.80 hrs. Emails regarding 10/03/19 L.J. WARCO 0.50 hrs. 10/28/19 Emails regarding L.J. WARCO 0.30 hrs. 11/05/19 Continue drafting reply in support of Motion for Summary Judgment. B.O. MOULARD 1.40 hrs. 11/06/19 Conduct research regarding Eleventh Circuit case law on prior restraints on free speech for purposes of preparing reply in support of Motion for Summary Judgment. B.O. MOULARD 2.20 hrs. 11/06/19 Research Federal Rules of Civil Procedure, Local Rules, and case law to determine whether AISS's response to Plaintiff's Cross-Motion for Summary Judgment has a different deadline than a regular motion for summary judgment. M.K. BELL 0.50 hrs. 11/07/19 Continue drafting portion of reply brief relating to Plaintiff's facial attack on APS's publiccomment policy; conduct research to locate analogous case law. **B.O. MOULARD** 5.50 hrs. 11/07/19 Emails regarding L.J. WARCO 0.30 hrs. 11/07/19 Research Federal Rule of Civil Procedure 6(d) to determine whether date on which AISS's response to Plaintiff's Cross-Motion for Summary Judgment is due in light of way in which Plaintiff filed the motion; contact Mr. Dyer to discuss same M.K. BELL 1.50 hrs. 11/07/19 Review Plaintiff's Cross-Motion for Summary Judgment and other filings in preparation for

preparing a response.

11/18/19

filing.

December 13, 2019 Invoice 2043837 Page 2

M.K. BELL 0.60 hrs. Complete portion of reply in support of Motion for Summary Judgment relating to Plaintiff's 11/08/19 facial attack on APS's public-comment policy; conduct additional research regarding criteria for lawful prior constraints of speech within limited public forums; continue drafting portion of reply in support of Motion for Summary Judgment relating to Plaintiff's prior restraint and viewpoint discrimination arguments. **B.O. MOULARD** 5.30 hrs. 11/08/19 Draft AISS's response to Plaintiff's Statement of Material Facts. M.K. BELL 1.70 hrs. 11/10/19 Continue to draft AISS's response to Plaintiff's Statement of Material Facts; review exhibits, including videos from multiple Board and community meetings, to which Plaintiff cites in his Statement of Material Facts to determine whether they support Plaintiff's Statement of Material Facts. M.K. BELL 3.80 hrs. Complete first draft of reply in support of Motion for Summary Judgment; revise first draft of 11/11/19 reply brief; review and edit first and second drafts of response to Plaintiff's Statement of Additional Material Facts; prepare both documents for filing. **B.O. MOULARD** 4.50 hrs. 11/11/19 Review and revise AISS's Response to Plaintiff's Statement of Material Facts and prepare same for filing. M.K. BELL 2.60 hrs. 11/12/19 Draft response to petitioners' cross-motion for summary judgment. M.K. BELL 1.60 hrs. Communications 11/13/19 M.K. BELL 0.10 hrs. Confirm FRCP 6(d) applies to response to cross-motion for summary judgment. 11/13/19 M.K. BELL 0.10 hrs. 11/15/19 Research Federal Rule of Civil Procedure 7 and related case law to determine what must be included in a motion for it to be a proper motion in preparation for drafting AISS's response to Plaintiff's cross-motion for summary judgment. M.K. BELL 0.80 hrs. 11/17/19 Research what must be included in a motion for summary judgment to constitute a proper motion for summary judgment in preparation for drafting AISS's response to Plaintiff's crossmotion. M.K. BELL 1.00 hrs. 11/18/19 Review and edit response in opposition to Plaintiff's cross-motion for summary judgment prepared by Attorney Bell. B.O. MOULARD 1.10 hrs. 11/18/19 Research other requirements for a motion for summary judgment for purposes of drafting AISS's response to Plaintiff's cross-motion for summary judgment; draft AISS's response to Plaintiff's cross-motion, including introduction, procedural history, and legal argument. M.K. BELL 2.50 hrs.

Revise AISS's response to Plaintiff's cross-motion for summary judgment and prepare for

## Case 1:18-cv-03284-TCB Document 51-2 Filed 01/21/20 Page 44 of 45

Atlanta Public Schools

December 13, 2019 Invoice 2043837 Page 3

M.K. BELL 0.90 hrs.

Total Fees for Legal Services .......\$10,722.50

## CHARGES FOR OTHER SERVICES PROVIDED/EXPENSES INCURRED

11/07/2019 Westlaw 163.02 **Total Charges for Other Services Provided/Expenses Incurred** \$163.02

**DISBURSEMENT SUMMARY** 

 Description
 Dollars

 Westlaw
 163.02

 TOTAL
 \$163.02

TOTAL FOR THIS INVOICE.......\$10,885.52

December 13, 2019 Invoice 2043837 Page 4

## **REMITTANCE COPY**

Please Return With Your Payment To:

ATTN: Accounts Receivable
Nelson Mullins Riley & Scarborough LLP

Post Office Drawer 11009 Columbia, South Carolina 29211 Telephone (803) 799-2000 accounts.receivable@nelsonmullins.com

Atlanta Public Schools ATTN: Lisa Bracken 130 Trinity Avenue Atlanta, GA 30303 United States of America

Our Matter # 041294/01735 For Services Through 11/30/19

APS Litigation

Name of Matter: Dyer, Nathaniel (Litigation)

Fees for Professional Services \$10,722.50

Charges for Other Services Provided/Expenses Incurred \$163.02

Terms of Payment: Balance due within thirty days of invoice date

#### **ELECTRONIC PAYMENT INSTRUCTIONS**

#### <u>Domestic Wire</u> <u>And ACH Transfer</u>

Foreign Wire (USD)
<u>Transfer</u>

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