

Law Offices of
STEVENS|CLAY^{PS}
1575 PAULSEN CENTER
421 WEST RIVERSIDE
SPOKANE, WA 99201-0402
TAX I.D. NO. 91-1272832

SPOKANE PUBLIC SCHOOLS
200 North Bernard Street
Spokane, WA 99201

ATTN: Dr. Mark E. Anderson

October 13, 2014

BILLING SUMMARY FOR SEPTEMBER 2014

GENERAL MATTERS

SERVICES RENDERED:	\$42,774.50
EXPENSES:	<u>\$ 5,158.10</u>

TOTAL AMOUNT DUE:	<u><u>\$47,932.60</u></u>
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Approved to Pay
[Signature]
10-17-14

601 970011-6702

RECEIVED

OCT 17 2014

SCHOOL SUPPORT SERVICES

STEVENS ~ CLAY, P.S.
 421 West Riverside
 Suite 1575, Paulsen Center
 Spokane, WA 99201-0402

Statement

Statement Date:
 Oct 13, 2014

Voice: (509) 838-8330
 Fax: (509) 623-2131

Customer Account ID:
 SSD

Account Of: SPOKANE SCHOOL DISTRICT NO. 81
 200 NORTH BERNARD
 SPOKANE, WA 99201-0282

Amount Enclosed
 \$

Date	Date Due	Reference	Paid	Description	Amount	Balance
10/13/14	11/12/14	9687			47,932.60	47,932.60
					Total	47,932.60

0 - 30	31 - 60	61 - 90	Over 90 days
47,932.60	0.00	0.00	0.00

Unpaid accounts will be imposed 1% per month interest (annual rate of 12%)

Stevens ~ Clay, P.S.

421 West Riverside, Suite 1575
Spokane, WA 99201
Tax #91-1272832

SPOKANE PUBLIC SCHOOLS
North 200 Bernard St.
Spokane WA 99201-0282

Invoice # 9687

October 13, 2014

ATTN: Dr. Mark E. Anderson

GENERAL MATTERS

- 9/1/2014 PEC CORRESPONDENCE RE EMPLOYEE EVALUATION GRIEVANCE; REVIEW SAME; REVIEW CBA RE SAME; FOLLOW UP WITH TENNILLE RE SAME
- 9/2/2014 PEC FURTHER WORK ON GRIEVANCE RESPONSE; FOLLOW UP WITH TENNILLE ET AL RE SAME; CORRESPONDENCE RE PRA REQUEST FOR PERSONNEL RECORD; FOLLOW UP WITH LAURA RE SAME; CORRESPONDENCE RE PRA PANEL; FOLLOW UP WITH TERRI RE SAME; CORRESPONDENCE RE EMPLOYEE RESOLUTION; FOLLOW UP WITH TENNILLE RE SAME
- 9/2/2014 BEK REVIEW CORRESPONDENCE RE LYBBERT DISCOVERY, EXTENDED REVIEW/REDACTION OF MATERIALS RE SAME
- 9/2/2014 ANA RESEARCH RE STUDENT DISCIPLINE AND PROCEDURAL SAFEGUARDS UNDER SECTION 504
- 9/2/2014 KNR PREPARE DOCUMENTS FOR REQUEST FOR PRODUCTION
- 9/3/2014 PEC CORRESPONDENCE RE RESIGNATION AGREEMENT; EXTENSIVE FOLLOW UP WITH TENNILLE RE SAME; CORRESPONDENCE RE PRA PANEL; WORK ON SAME; WORK ON INFORMAL DISCOVERY ISSUES FOR PENDING LITIGATION; CORRESPONDENCE RE INSURANCE ARCHAEOLOGY FOR PENDING LITIGATION; WORK ON SAME; FOLLOW UP WITH MICHELE PIERRO RE SAME; CORRESPONDENCE RE STUDENT VOLUNTEER ISSUE
- 9/3/2014 BEK CONTINUED REVIEW/REDACTION OF MATERIALS RE LYBBERT DISCOVERY, DRAFT CORRESPONDENCE RE SAME, PREPARE MATERIALS RE SAME, BRIEF TELEPHONE CONVERSATION WITH T. LEFORS RE SAME
- 9/4/2014 PEC TELEPHONE DISCUSSION WITH TENNILLE RE EMPLOYEE'S POTENTIAL RESIGNATION AGREEMENT; FOLLOW UP RE SAME; REVIEW CBA RE SAME; CORRESPONDENCE RE PARENT MEETING; FOLLOW UP WITH MARK RE SAME; CORRESPONDENCE RE AMICUS FOR SUPREME COURT CASE; CORRESPONDENCE RE PENDING LITIGATION AND MEDIATION; REVIEW MATERIALS RE SAME; CONFERENCE CALL RE INSURANCE ARCHAEOLOGY; FOLLOW UP WITH MARK RE SAME; WORK ON PENDING LITIGATION MATTER AND DISCOVERY ISSUES; FOLLOW UP WITH MARK RE SAME; CORRESPONDENCE RE PRA REQUEST AND ATTORNEY FOLLOW UP
- 9/4/2014 BEK REVIEW/PREPARATION OF MATERIALS RE LYBBERT DISCOVERY
- 9/5/2014 PEC CORRESPONDENCE RE PERSONNEL RECORD REQUEST; FOLLOW UP WITH LAURA RE SAME; TELEPHONE DISCUSSION WITH KIM FOX RE EVALUATION ISSUES; CORRESPONDENCE RE TPEP MOU; REVIEW AND REVISE SAME; FOLLOW UP WITH KIM H. RE SAME; CORRESPONDENCE RE ATTORNEY REQUEST; FOLLOW UP WITH LAURA RE SAME
- 9/6/2014 PEC CORRESPONDENCE FROM RAMON RE HRC RESPONSE; WORK ON SAME; REVIEW LYBBERT RECORDS; FOLLOW UP RE SAME; WORK ON SRO AGREEMENT

- 9/6/2014 ANA RESEARCH RE SECTION 504 NOTIFICATION AND ELIGIBILITY LAWS; RESEARCH RE ISOLATION AND RESTRAINT OF STUDENTS
- 9/6/2014 TLB FINAL REVIEW OF WASHINGTON STATE HUMAN RIGHTS COMMISSION RESPONSE
- 9/7/2014 PEC FURTHER WORK ON HRC RESPONSE; FOLLOW UP WITH RAMON RE SAME; BEGIN WORK ON PREDISIK MEDIATION STATEMENT; REVIEW DOCUMENTS RE SAME
- 9/7/2014 ANA CORRESPONDENCE RE SECTION 504; RESEARCH RE SCHOOL FINANCIAL PLANNING AND MANAGEMENT LAWS
- 9/8/2014 PEC CORRESPONDENCE RE STUDENT VOLUNTEER ISSUES; FOLLOW UP WITH MARK RE SAME; WORK ON SPED AND 504 POLICIES; CORRESPONDENCE RE PENDING LITIGATION; FOLLOW UP RE SAME
- 9/8/2014 ANA RESEARCH RE RECENT CHANGES TO SPECIAL EDUCATION LAW; FOLLOW UP WITH FRANKLIN DAY RE SAME
- 9/9/2014 PEC CORRESPONDENCE RE BOARD MEMBER CONCERNS; FOLLOW UP RE SAME; CORRESPONDENCE RE ATTORNEY INQUIRY ABOUT EMPLOYMENT RECORDS; FOLLOW UP WITH ATTORNEY RE SAME; CORRESPONDENCE RE PENDING LITIGATION; TELEPHONE DISCUSSION WITH MARK A. RE BOARD MEMBER FOLLOW UP; WORK ON SRO AGREEMENT; FINALIZE SAME AND FOLLOW UP WITH ADMINISTRATIVE TEAM RE SAME; FURTHER WORK ON PENDING LIABILITY LITIGATION; REVIEW MEDIATION STATEMENT RE SAME
- 9/9/2014 BEK EXTENDED REVIEW/PREPARATION OF LYBBERT PERSONNEL FILE, BRIEF TELEPHONE CONVERSATION WITH L. SUMNER RE SAME; ANALYSIS OF ISSUES RE LYBBERT DISCOVERY, PREPARE MATERIALS RE SAME
- 9/9/2014 TLB REVIEW OF PUBLIC DISCLOSURE COMMISSION PRESENTATIONS; DRAFT OF PROGRAM DESCRIPTION
- 9/9/2014 TLB REVIEW OF EMPLOYEE 360 DEGREE LEADERSHIP ASSESSMENT, DISTRICT EMAIL CORRESPONDENCE, PERSONNEL FOLDER, AND RETALIATION CLAIM DOCUMENTS RE RETALIATION AND DEMOTION CLAIM
- 9/10/2014 PEC CORRESPONDENCE RE PRA COMMITTEE; WORK ON AGENDA FOR SAME; FOLLOW UP WITH MARK RE SAME; TELEPHONE DISCUSSION WITH MEDIATOR RE LYBBERT; TELEPHONE DISCUSSION WITH RAMON RE SOCIAL MEDIA MISUSE; WORK ON MEDIATION STATEMENT; REVIEW DOCUMENTS RE SAME
- 9/10/2014 TLB RESEARCH RE FURTHER PROCEEDINGS/ORDERS NECESSARY AFTER COURT OF APPEALS AFFIRMS PRELIMINARY INJUNCTION; REVIEW OF EMPLOYEE 360 DEGREE LEADERSHIP ASSESSMENT, DISTRICT EMAIL CORRESPONDENCE, PERSONNEL FOLDER, AND RETALIATION CLAIM DOCUMENTS RE RETALIATION AND DEMOTION CLAIM; REVIEW AND REDLINE OF MEDIATION MEMORANDUM RE SEXUAL ABUSE ALLEGATION
- 9/11/2014 PEC WORK ON PREDISIK MEDIATION BRIEF; FINALIZE DRAFT RE SAME AND FOLLOW UP WITH TENNILLE AND MARK; CORRESPONDENCE RE REQUEST FOR PERSONNEL INVESTIGATIVE FILE; REVIEW SAME AND FOLLOW UP WITH LAURA RE SAME; CORRESPONDENCE RE TPEP MOU; FOLLOW UP WITH KIM RE SAME; TELEPHONE DISCUSSION WITH KIM RE SAME AND RE PRINCIPAL TRAINING; REVIEW AND REVISE TPEP MOU; FOLLOW UP WITH KIM RE SAME; CORRESPONDENCE RE SRO'S; FOLLOW UP WITH MARK ET AL RE SAME

9/11/2014 TLB REVIEW AND REDLINE OF MEDIATION MEMORANDUM RE SEXUAL ABUSE ALLEGATION; REVIEW OF EMPLOYEE 360 DEGREE LEADERSHIP ASSESSMENT, DISTRICT EMAIL CORRESPONDENCE, PERSONNEL FOLDER, AND RETALIATION CLAIM DOCUMENTS RE RETALIATION AND DEMOTION CLAIM

9/12/2014 PEC CORRESPONDENCE RE PENDING LITIGATION; FOLLOW UP RE SAME; PREPARE FOR CONFERENCE CALL RE PERSONNEL MEDIATION; WORK ON SAME; CORRESPONDENCE RE SRO AGREEMENT; FOLLOW UP RE SAME; CORRESPONDENCE RE APPELLATE CASE; REVIEW BRIEFING RE SAME; CORRESPONDENCE RE EASTERLING; CORRESPONDENCE RE MEDIATION ISSUES; WORK ON SAME

9/12/2014 BEK REVIEW MATERIALS RE MILITARY RECRUITER REQUEST, BRIEF RESEARCH RE SAME, TELEPHONE CONVERSATION WITH T. LEFORS RE SAME

9/12/2014 ANA RESEARCH RE FINANCIAL PLANNING AND MANAGEMENT LAWS

9/13/2014 PEC WORK ON STRATEGY FOR UPCOMING PERSONNEL MEDIATION; CORRESPONDENCE WITH TENNILLE RE SAME; CORRESPONDENCE RE TPEP TRAININGS; FOLLOW UP RE SAME

9/14/2014 PEC WORK ON PERSONNEL MEDIATION

9/15/2014 PEC CORRESPONDENCE RE AMICUS BRIEFING; FOLLOW UP RE SAME; PREPARE FOR CONFERENCE CALL RE PERSONNEL MEDIATION; FINALIZE MEDIATION STATEMENT; WORK ON PENDING LITIGATION AND POTENTIAL RESOLUTION; REVIEW AMICUS BRIEFS AND WORK ON RESPONSES TO SAME; REVIEW NEW TORT CLAIM; FURTHER WORK ON PENDING LITIGATION MATTER; CORRESPONDENCE RE SAME; TELEPHONE DISCUSSION WITH TENNILLE RE MEDIATION AND MISCELLANEOUS PERSONNEL MATTERS

9/15/2014 BEK REVIEW/PREPARATION OF PREDISIK-KATKE AMICUS BRIEFS

9/15/2014 ANA TELEPHONE DISCUSSION WITH FRANKLIN DAY RE SPECIAL EDUCATION PROCEDURES, RESEARCH RE SPECIAL EDUCATION LAWS; CORRESPONDENCE RE SAME; RESEARCH RE PATTERN OF REMOVALS

9/15/2014 TLB CONTINUE REVIEW OF DISTRICT EMAIL CORRESPONDENCE, PERSONNEL FOLDER, AND RETALIATION CLAIM DOCUMENTS RE RETALIATION AND DEMOTION CLAIM

9/16/2014 PEC WORK ON MEDIATION PREPARATION FOR PERSONNEL MATTER; CORRESPONDENCE RE MESA AGREEMENT; WORK ON RESPONSE RE SAME; FOLLOW UP WITH MARK RE SAME; WORK ON STUDENT SERVICES POLICY; TELEPHONE DISCUSSION WITH MARK A. RE SRO STATUS; WORK ON SAME; FOLLOW UP WITH MARK RE SAME; CORRESPONDENCE RE CHARTER SCHOOL FACILITY; FOLLOW UP WITH JEANNETTE RE SAME; CORRESPONDENCE RE AMICUS BRIEFING; FOLLOW UP WITH MARK AND TENNILLE RE SAME; TELEPHONE DISCUSSION WITH TENNILLE AND KIM RE OBSERVATIONS; WORK ON PANEL CASE STUDIES; CORRESPONDENCE RE MEDIATION SCHEDULING

9/17/2014 PEC CORRESPONDENCE RE SRO AGREEMENT; PREPARE FOR AND ATTEND MEDIATION RE PERSONNEL MATTER; WORK ON SAME; CORRESPONDENCE WITH MARK RE SAME; CORRESPONDENCE RE RECORDS COMMITTEE; FOLLOW UP RE SAME

9/17/2014 ANA CORRESPONDENCE RE PATTERN OF REMOVAL UNDER SECTION 504

9/17/2014 KNR WORK ON SCHEDULING MEDIATION

9/17/2014 TLB MEDIATION RE ALLEGATION OF INAPPROPRIATE COUNSELOR CONDUCT

9/18/2014 PEC CORRESPONDENCE RE CITIZENS COMMITTEE; FOLLOW UP AND WORK ON SAME; CORRESPONDENCE RE PRINCIPAL EVALUATION; PREPARE FOR AND MEET WITH MARK AND TERRI RE CITIZEN PANEL AND MISCELLANEOUS ADMINISTRATIVE MATTERS; MEET WITH MARK AND TENNILLE RE PERSONNEL MATTERS; TELEPHONE DISCUSSION WITH KIM FOX RE EVALUATION ISSUE; FOLLOW UP WITH ATTORNEY RE SAME; WORK ON PENDING LITIGATION MATTER; MEET WITH MARK RE SAME; FOLLOW UP RE SAME

9/18/2014 TLB CONTINUE REVIEW OF DISTRICT EMAIL CORRESPONDENCE, PERSONNEL FOLDER, AND RETALIATION CLAIM DOCUMENTS RE RETALIATION AND DEMOTION CLAIM

9/19/2014 PEC CORRESPONDENCE RE PERSONNEL MEDIATION; FOLLOW UP WITH MARK AND TENNILLE RE SAME; CORRESPONDENCE RE STUDENT RECORD REQUEST; FOLLOW UP WITH MARK RE SAME; CORRESPONDENCE RE ADMINISTRATOR MEDIATION; FOLLOW UP WITH TENNILLE RE SAME; TELEPHONE DISCUSSION WITH OPPOSING COUNSEL RE PENDING LITIGATION; FOLLOW UP WITH MARK RE SAME; WORK ON PENDING LIABILITY MATTER; TELEPHONE DISCUSSION WITH MARK RE CITIZENS COMMITTEE; TELEPHONE DISCUSSION WITH TERRI RE SAME

9/19/2014 ANA RESEARCH RE SCHOOL CONSTRUCTION LAWS

9/20/2014 PEC CORRESPONDENCE RE CITIZENS PANEL; WORK ON SAME; CORRESPONDENCE RE FERPA AND STUDENT VIDEO TAPING; RESEARCH RE SAME; FOLLOW UP WITH KEVIN AND BRENT RE SAME; CORRESPONDENCE RE PERSONNEL GRIEVANCE PROCESS

9/20/2014 ANA RESEARCH RE SCHOOL CONSTRUCTION LAWS AND ARCHITECT AND ENGINEERING SERVICES

9/21/2014 ANA RESEARCH RE SCHOOL CONSTRUCTION LAWS AND ENERGY SERVICE CONTRACTS

9/22/2014 PEC CORRESPONDENCE RE SRO AGREEMENT; FOLLOW UP WITH JASON ET AL RE SAME; CORRESPONDENCE RE DATA SHARING AGREEMENT; REVIEW AND WORK ON SAME; CORRESPONDENCE RE GRIEVANCE RESPONSES; FOLLOW UP RE SAME; PREPARE FOR CITIZENS PANEL MEETING; ATTEND MEETING RE SAME

9/22/2014 ANA RESEARCH RE SCHOOL BIDDING AND FACILITY USAGE LAWS; REVIEW CORRESPONDENCE RE AMPLIFY DATA SHARING AGREEMENT, ANALYZE ISSUES RE SAME

9/23/2014 PEC PREPARE FOR AND MEET WITH SHELLEY ET AL RE PERSONNEL MATTER AND RE AFTER SCHOOL CLUB; MEETING WITH TENNILLE RE GRIEVANCE AND RE ADMINISTRATOR EVALUATION; CORRESPONDENCE RE MEETING MINUTES; REVIEW SAME AND FOLLOW UP RE SAME; CORRESPONDENCE RE SEA GRIEVANCE DEMAND; FOLLOW UP WITH TENNILLE RE SAME; CORRESPONDENCE WITH WEA ATTORNEY RE PERSONNEL MATTER; CORRESPONDENCE RE CITIZENS PANEL; FOLLOW UP WITH TERRI RE SAME; CORRESPONDENCE RE COBRA NOTICE; REVIEW AND RESEARCH SAME; FOLLOW UP WITH LAURA RE SAME; CORRESPONDENCE RE RESOLUTION OF PERSONNEL MATTER; FOLLOW UP WITH TENNILLE RE SAME

9/23/2014 ANA RESEARCH RE SCHOOL BIDDING AND FACILITY USAGE LAWS; WORK ON SUGGESTIONS AND COMMENTS TO AMPLIFY DATA SHARING AGREEMENT

9/24/2014 PEC CORRESPONDENCE RE AMICUS BRIEFING; FOLLOW UP RE SAME; CONFERENCE CALL WITH PHIL BURI RE ORAL ARGUMENT; REVIEW PLEADINGS RE SAME; WORK ON DATA SHARING AGREEMENT AND CORRESPONDENCE RE SAME; CORRESPONDENCE RE PRINCIPAL AND ADMINISTRATOR EVALUATIONS; RESEARCH RE SAME; FOLLOW UP WITH KIM H. RE SAME

9/24/2014 ANA REVIEW AND REVISE SUGGESTIONS AND COMMENTS TO DATA SHARING AGREEMENT, CORRESPONDENCE WITH BARB CARSON RE SAME; FOLLOW UP RE SCHOOL BIDDING AND FACILITY USAGE LAW

9/25/2014 PEC TELEPHONE DISCUSSION WITH MARK RE SUPREME COURT APPEAL; WORK ON SAME; PREPARE CORRESPONDENCE RE SAME; TELEPHONE DISCUSSION WITH SHELLEY ET AL RE PERSONNEL MATTER; FOLLOW UP RE SAME

9/26/2014 PEC CORRESPONDENCE RE POTENTIAL RESOLUTION OF EMPLOYMENT MATTER; FOLLOW UP WITH TENNILLE RE SAME; CORRESPONDENCE RE CITIZENS COMMITTEE; TELEPHONE DISCUSSION WITH TENNILLE RE SRO ISSUE; CORRESPONDENCE RE PRINCIPAL TRANSFER STATUTE; FOLLOW UP WITH KIM RE SAME; CORRESPONDENCE RE PDC AND PAYROLL DEDUCTION MATTER; TELEPHONE DISCUSSION WITH MARK A. RE SAME; TELEPHONE DISCUSSION WITH TENNILLE RE SRO ISSUE; CORRESPONDENCE FROM SUPREME COURT RE AMICUS RESPONSE; CORRESPONDENCE WITH WEA ATTORNEY RE PERSONNEL MATTER; FOLLOW UP RE SAME

9/26/2014 JAM SUPPLEMENTAL DOCUMENT PRODUCTION RE POTENTIAL ROETH-BOTZON CLAIM, DOCUMENT REVIEW RE SAME, CORRESPONDENCE TO ATTORNEY MAXEY

9/27/2014 PEC REVIEW PREDISIK AMICUS BRIEFS FOR POSSIBLE RESPONSES

9/29/2014 PEC CORRESPONDENCE RE PROVISIONAL PRINCIPALS; FOLLOW UP WITH KIM H. RE SAME; REVIEW WCOG BRIEF; FOLLOW UP WITH PHIL BURI RE SAME

9/29/2014 BEK REVIEW CORRESPONDENCE/MATERIALS RE SERVICE DOGS, ANALYSIS OF ISSUES RE SAME, RESEARCH RE SAME, TELEPHONE CONVERSATION WITH J. CONLEY RE SAME

9/29/2014 ANA RESEARCH RE SECTION 504 ACCOMMODATIONS

9/30/2014 PEC CORRESPONDENCE RE MOU FOR SRO COVERAGE; REVIEW MOU AND PROPOSAL RE SAME; CORRESPONDENCE RE PERSONNEL RESTRUCTURING; FOLLOW UP RE SAME

9/30/2014 BEK WORK ON RESEARCH RE SERVICE DOGS, CORRESPONDENCE RE SAME

9/30/2014 ANA WORK ON LETTER RE RECENT SECTION 504 DECISIONS

For professional services rendered

\$42,774.50

Additional Charges :

9/30/2014 ONLINE RESEARCH CHARGES	3.70
9/30/2014 MISCELLANEOUS EXPENSES	19.80
9/30/2014 ONE0 DOCUMENT REVIEW FEES	134.00
9/30/2014 BURI FUNSTON CONSULTING FEE	775.00
9/30/2014 IAG CONSULTING FEES	4,225.60

Total costs

\$5,158.10

Total amount of this bill

\$47,932.60