UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc., an Illinois non-profit corporation, and Danny Lee Shelton, individually,))) Case No.: 07-40098-FDS
Plaintiffs, v.)))
Gailon Arthur Joy and Robert Pickle,)
Defendants.)))

AFFIDAVIT OF ROBERT PICKLE

NOW COMES Robert Pickle of Halstad Township, Norman County, Minnesota, who deposes and testifies to the following under pain and penalty of perjury:

1. I have traveled to the Franklin County area on two occasions in order to conduct research pertaining to the instant case, and to gather documents. The mileage pertaining to the lawsuit that is associated with those trips appears in Table 1 below, along with a cost based on the IRS standard mileage rate for the years 2007 and 2008.

TABLE 1: Mileage from Fact-finding Trips

Destination (s)	Dates	Mileage	Standard Mi. Rate	Cost
Marion, Benton	June 6-7, 2008	819	\$0.485	\$397.22
Marion, Benton, Thompsonville, Mt. Vernon, Springfield, Madison	April 21-25, 2008	1181	\$0.505	\$596.41
Total				

2. Various miscellaneous expenses I have paid for in the course of this litigation are listed in Table 2 below. The list does not cover every expense of these sorts that was paid. Note the high cost of obtaining the records of MidCountry Bank, which the Defendants never

received.

TABLE 2: Various Miscellaneous Expenditures over the Course of the Litigation

Date	Item	Payee	Purpose	Cost
10/23/07	Mending Broken People (used)	Better World Books	Background, research	\$9.01
11/16/07	Postage for court documents	U.S. Postal Service	Opposition to emergency motion	\$15.75
11/19/07	Certified letter to Hayes	U.S. Postal Service	Notice for getting Rule 26(a)(1) mtrls	\$3.06
11/19/07	FaxAway deposit	FaxAway (email to fax)	Service of letters, etc.	\$10.00
11/27/07	Service of subpoena	Branch County Sheriff	Service on Remnant Publications	\$18.00
12/06/07	Service of subpoena	Branch County Sheriff	Service on Century Bank & Trust	\$18.00
12/06/07	Certified letter to Hayes	U.S. Postal Service	RPD's for Danny Shelton	\$4.54
12/28/07	Copying of court documents	Red River State Bank	Opposition: motion for protective order	\$6.75
12/28/07	Postage for court documents	U.S. Postal Service	Opposition: motion for protective order	\$21.25
01/03/07	Mundall, Miller, Hayes, Tommy	U.S. Postal Service	Certified service of possible motion	\$14.82
01/07/08	Filing of miscellaneous case	Clerk of W.D.MI	Necessary for issuing subpoenas	\$39.00
01/07/08	Accrued PACER charges	PACER	Downloading court filings	\$42.96
01/11/08	Copies: 3ABN's annual filings	Oregon DOJ	Research into 3ABN finances	\$10.20
01/15/08	Certified lt. to Derrell Mundall	U.S. Postal Service	Service of possible motion	\$3.23
02/01/08	Internet fax service	FaxAway	Sending documents to attorneys	\$10.00
02/15/08	Photocopies	Red River State Bank	Copies of court documents	\$2.40
02/19/08	Photocopies	Red River State Bank	Copies of court documents	\$1.70
02/21/08	Service of subpoena	Branch County Sheriff	Service on Remnant Publications	\$18.00
02/22/08	DVD recorder	Dyscern LLC	Old unit damaged(?) during CD recovery	\$35.50
03/14/08	Refund: canceling account	FaxAway	Now faxing using Brother 8860DN.	-\$8.19
03/14/08	Copies: 3ABN's annual filings	Illinois Attorney General	Research into 3ABN finances	\$8.25
04/04/08	Accrued PACER charges	PACER	Downloading court filings	\$14.24
04/22/08	Copies of real estate records	Franklin Co. Clerk	re: Real estate shenanigans	\$27.00
04/22/08	Copies of court records	Circuit Clerk	re: DLS's marital assets case	\$48.50
04/22/08	Room for the night	Amer. Best Value Inn	Lodging in West Frankfort, Illinois	\$49.90
04/24/08	Parking fee	Springfield courthouse	Research at courthouse	\$2.00
04/25/08	Shower	N. Lisbon Travel Center	Shower	\$6.00
04/30/08	Assistant for fact-finding trip	John Kannenberg	His charge to me to assist	\$395.00
05/01/08	Postage	U.S. Postal Service	Motion to compel Remnant	\$15.60
05/28/08	Records of MidCountry Bank	MidCountry Bank	Discovery re: private inurement	\$3,682.50
06/06/08	Drive enclosure	NewEgg.com	Preparation for on-site inspection of	\$23.42
06/06/08	Hard drive for enclosure	ZipZoomFly.com	Auditor's records	\$63.53
07/03/08	Postage for service	U.S. Postal Service	Motion to compel in S.D.IL	\$26.14
07/07/08	CD sleeves	Office Max	Protect discovery-related CD's	\$5.31
07/27/08	Cellphone excess minutes	John Kannenberg	Excess usage during April trip	\$50.40
07/07/08	Accrued PACER charges	PACER	Downloading court filings	\$19.52
08/20/08	Postage for service	U.S. Postal Service	Opposition to Remnant Appeal	\$17.29
09/12/08	Postage for service	U.S. Postal Service	Status report for S.D.IL	\$5.36
09/15/08	Articles: Duffy and McNeilus	Newslibrary.com	Background research	\$5.95
09/26/08	Postage for service	U.S. Postal Service	Revised RPD's	\$2.36
10/03/08	Accrued PACER charges	PACER	Downloading court filings	\$8.64
10/10/08	Records of MidCountry Bank	MidCountry Bank	Refund of excess shipping charge	-\$147.91
	Charges through Oct. 28, 2008	PACER (D.MA only)	Charges through October 28, 2008	\$9.92
		Total		\$4,614.90

3. I purchased a Brother 8860DN in order to scan or copy the large number of

documents we asked Gray Hunter Stenn LLP (hereafter "GHS") to produce, since we needed to protect GHS as far as possible from undue expense. The unit, toner, and drum which I purchased cost a total of \$522.66. I used the unit to prepare filings for the courts in the Western District of Michigan and the Southern District of Illinois, where ECF filing was not permitted. Table 3 presents the total number of copies run off of this unit for those filings (including copies for opposing counsel), times 10¢ per copy.

TABLE 3: Copying Costs

Date	Documents	Copies	Rate	Cost
05/01/08	Motion to Compel Remnant	548	\$0.10	\$54.80
07/03/08	Motion to Compel GHS	998	\$0.10	\$99.80
08/20/08	Opposition to Remnant's Appeal	500	\$0.10	\$50.00
09/12/08	Status Report to S.D.IL	21	\$0.10	\$2.10
Total				\$206.70

4. Table 4 is a summary of the hours I have logged working on my defense. There were times when I did not record my hours. For work I do in this locality where I live, I charge \$25 an hour.

TABLE 4: Hours Invested in Defense

Time Period	Hours Recorded	Rate	Cost
Nov. 2007	134.00	\$25.00	\$3,350.00
Dec. 2007	131.50	\$25.00	\$3,287.50
Jan. 2008	76.67	\$25.00	\$1,916.75
Feb. 2008	167.33	\$25.00	\$4,183.25
Mar. 2008	90.50	\$25.00	\$2,262.50
Apr. 2008	51.67	\$25.00	\$1,291.75
May 2008	41.75	\$25.00	\$1,043.75
Jun. 2008	78.00	\$25.00	\$1,950.00
Jul. 2008	57.00	\$25.00	\$1,425.00
Aug. 2008	84.75	\$25.00	\$2,118.75
Sep. 2008	163.75	\$25.00	\$4,093.75
Oct. 2008	127.67	\$25.00	\$3,191.75
	Total		\$30,114.75

5. Attached hereto as **Exhibit A** are a series of invoices I received from one of the experts we retained, which total \$20,342.32.

6. Attached hereto as **Exhibit B** is an invoice from Attorney Laird Heal to Gailon Arthur Joy in the amount of \$666.69. Attached hereto as **Exhibit C** is an invoice from Attorney Laird Heal to myself in the amount of \$53,600.25.

FURTHER DEPONENT TESTIFIES NOT.

Signed and sealed this 13th day of November, 2008.

/s/ Bob Pickle

Bob Pickle Halstad, MN 56548 Tel: (218) 456-2568

Subscribed and sworn to me this 13th day of November, 2008.

/s/ Lori J. Rufsvold Notary Public—Minnesota

My Commission Expires Jan. 31, 2010

Ex. A

1,397.58

Lynette Rhodes, CPA, CFE 2530 Vista Way #F114 Oceanside, California 92054

September 30, 2007 Invoice # 1350

Attn: Bob Pickle

1354 County Road 21

TOTAL DUE:

Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc

and Danny Lee Shelton v.
Gailon Arthur Joy and Robert Pickle

Professional services rendered through September 30, 2007:

		<u>Hours</u>	
9/4/2007	Telephone call to GAJ Email exchange with BP regarding Franklin	0.88	
9/5/2007	County research.	0.25	
9/6/2007	Franklin County Courthouse research and telephone calls to GAJ Summarize and email Franklin County	4.00	
9/7/2007	findings to BP/GAJ	1.00	
9/7/2007	Telephone call to Franklin County Clerk Telephone calls to BP regarding real	0.20	
9/12/2007	estate deeds	1.28	
9/13/2007	Telephone call to BP regarding real estate deeds	0.22	
	TOTAL HOURS	7.83	
	Hourly rate	\$ 175.00	
	Professional services billed		1,370.83
Expenses inc	urred:		
9/6/2007	Document copies - Franklin County		26.75

October 31, 2007 Invoice # 1372

Attn: Bob Pickle

1354 County Road 21

Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc

and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

BALANCE FORWARD: \$ 1,397.58

TOTAL DUE: \$ 1,397.58

November 30, 2007 Invoice # 1394

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

BALANCE FORWARD: \$ 1,397.58

Professional services rendered through November 30, 2007:

		<u>Hours</u>	
11/8/2007	Telephone call to BP regarding Form 990s	1.83	
	Create Form 990 Analysis Excel Spreadsheet	4.00	
	Create Form 990 Analysis Excel Spreadsheet	4.00	
	Telephone call to GAJ regarding Form 990s	0.03	
	Create Form 990 Analysis Excel Spreadsheet	2.00	
	Create Form 990 Analysis Excel Spreadsheet	6.00	
	Telephone call to BP regarding Form 990s	1.07	
	Preparation of initial request for documents	2.00	
	Telephone call to BP regarding document request	0.17	
	Travel from Paducah, Kentucky to Benton, Illinois	1.50	
	Franklin County Research	4.00	
	Telephone calls to BP regarding Franklin County research	1.32	
	Telephone call to GAJ regarding Franklin County research	0.03	
	Franklin County Courthouse Research	4.00	
	Travel from Benton, Illinois to Paducah, Kentucky	1.50	
	•		
	Telephone calls to BP regarding Franklin County research	1.03	
	Telephone calls to BP regarding Franklin County research	0.35	
	Telephone call to Franklin County Clerk	0.02	
11/20/2007	Telephone call to BP regarding Franklin County research Telephone call to GAJ regarding Franklin County research and	0.12	
11/20/2007	case status	4.85	
	Preparation of initial request for documents	1.50	
11/21/2007	Telephone calls to BP regarding document request	0.05	
11/23/2007	Telephone call to GAJ regarding document request	0.03	
11/24/2007	Telephone call to GAJ regarding document request	0.02	
11/26/2007	Telephone call to BP regarding Franklin County research	0.52	
11/27/2007	Telephone calls to BP regarding Franklin County research	0.85	
11/28/2007	Telephone call to GAJ regarding courthouse research	0.02	
11/28/2007	Telephone call to Franklin County Clerk	0.10	
11/28/2007	Telephone calls to Franklin County Supervisor of Assessments	0.37	
11/28/2007	Telephone calls to BP regarding Franklin county research	0.47	
11/29/2007	Telephone call to GAJ regarding Franklin County research	0.02	
11/29/2007	Telephone calls to BP regarding Franklin County research	0.38	
	TOTAL HOURS	44.13	
	Hourly rate	\$ 175.00	
	Professional services billed		\$ 7,723.33
Expenses inc	urred:		
11/15/2007	Mileage from Paducah, Kentucky to Benton, Illinois		34.44
	Document copies - Franklin County		19.50
	Document copies - Franklin County		27.50
	Lodging - Benton, Illinois		79.91
	Mileage from Paducah, Kentucky to Benton, Illinois		34.44
	TOTAL DUE:		\$ 9,316.70

December 31, 2007 Invoice # 1414

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Professional services billed

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

478.33

BALANCE FORWARD: 9,316.70 Professional services rendered through December 31, 2007: **Hours** 12/3/2007 Telephone call to BP regarding Tennessee research 0.15 12/7/2007 Tennessee Secretary of State Research 2.00 12/7/2007 Telephone call to BP regarding Tennessee research 0.03 12/18/2007 Telephone call to BP regarding Tennessee research 0.02 12/19/2007 Telephone calls to BP regarding Tennessee research 0.53 **TOTAL HOURS** 2.73 \$ 175.00 Hourly rate

Expenses incurred:

TOTAL DUE: \$ 9,795.03

January 31, 2008 Invoice # 1429

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

BALANCE FORWARD: \$ 9,795.03

Professional services rendered through January 31, 2008:

		<u>Hours</u>	
1/4/2008	Telephone call to BP regarding Franklin County research	0.63	
1/8/2008	Telephone calls to Franklin County Supervisor of Assessments	0.37	
1/8/2008	Telephone call to BP regarding Franklin County research	0.32	
1/11/2008	Telephone calls to BP regarding Franklin County research	0.38	
1/18/2008	Telephone call to BP regarding Franklin County research	0.44	
	Telephone calls to GAJ regarding Franklin County research and		
1/18/2008	case update	0.59	
1/28/2008	Telephone call to BP regarding Franklin County research	0.38	
1/29/2008	Telephone call to BP regarding ASI Missions Form 990s	0.11	
1/31/2008	Obtain and email Form 990s for ASI Missions	0.50	
	TOTAL HOURS	3.71	
	Hourly rate	\$ 175.00	
	Professional services billed		\$ 648.96

Expenses incurred:

TOTAL DUE: \$ 10,443.99

February 28, 2008 Invoice # 1443

Attn: **Bob Pickle**

> 1354 County Road 21 Halstad, Minnesota 56548

> > Re: Case No. 07-40098 FDS

> > > Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

BALANCE FORWARD: \$ 10,443.99

Professional services rendered through February 28, 2008:

		<u>Hours</u>		
	Telephone call to GAJ regarding Franklin County research and			
2/6/2008	case status update	1.63		
2/13/2008	Telephone call to BP regarding Franklin County research	0.02		
2/14/2008	Telephone calls to BP regarding Franklin County research	0.36		
2/19/2008	Telephone call to Franklin County Supervisor of Assessments	0.02		
2/19/2008	Telephone calls to BP regarding Franklin County research	0.19		
2/20/2008	Telephone call to BP regarding Franklin County research	0.08		
2/21/2008	Telephone call to Franklin County Supervisor of Assessments	0.07		
2/21/2008	Telephone call to BP regarding Franklin County research	0.08		
2/22/2008	Telephone call to Franklin County Clerk	0.17		
2/23/2008	Telephone call to BP regarding Franklin County research	0.53		
2/27/2008	Telephone call to BP regarding Franklin County research	0.12		
	TOTAL HOURS	3.24		
	Hourly rate	\$	175.00	
	Professional services billed			\$ 567.29
Expenses inc	curred:			

5.00 2/27/2008 Fax from Franklin County Clerk

TOTAL DUE: \$ 11,016.28

March 31, 2008 Invoice # 1465

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

BALANCE FORWARD: \$ 11,016.28

Professional services rendered through March 31, 2008:

		<u>Hours</u>	
3/6/2008	Telephone call to BP regarding Franklin County Research	0.09	
3/9/2008	Telephone call to GAJ regarding Franklin County Research	1.15	
3/10/2008	Telephone call to BP regarding Franklin County Research	0.13	
3/11/2008	Telephone calls to GAJ regarding Franklin County Research Telephone call to GAJ regarding Fran McDonald's Ebay	0.31	
3/13/2008	documents and case update Telephone calls to BP regarding Fran McDonald's Ebay	1.93	
3/14/2008	documents	0.19	
3/16/2008	Email from BP/GAJ re Fran McDonald's Ebay documents Telephone call to GAJ regarding Fran McDonald's Ebay	0.25	
3/16/2008	documents Telephone calls to BP regarding Fran McDonald's Ebay	0.42	
3/19/2008	documents	0.10	
	TOTAL HOURS	4.57	
	Hourly rate	\$ 175.00	
	Professional services billed		\$ 799.17

Expenses incurred:

TOTAL DUE: \$ 11,815.45

April 30, 2008 Invoice # 1487

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

BALANCE FORWARD: \$ 11,815.45

Professional services rendered through April 30, 2008:

		<u>Hours</u>	
4/4/2008	Telephone calls to BP regarding GarMar Form 990	0.29	
4/6/2008	Telephone call to BP regarding GarMar Form 990	0.08	
4/6/2008	Analysis of GarMar Form 990 and email to BP	1.50	
4/16/2008	Telephone calls to BP regarding property tax case	0.27	
4/17/2008	Telephone call to BP regarding property tax case	0.24	
4/20/2008	Review Illinois property tax case and appeal transcripts	2.00	
4/22/2008	Fran McDonald emails forwarded from GAJ	0.50	
	Telephone calls to GAJ regarding Ebay, property tax case and		
4/22/2008	case update	1.33	
4/23/2008	Review Illinois property tax Administrative Hearing transcript	1.00	
4/23/2008	Telephone call to GAJ regarding property tax case	0.09	
4/25/2008	Telephone call to BP regarding property tax case	0.02	
4/28/2008	Telephone calls to GAJ regarding property tax case	0.70	
4/29/2008	Telephone call to GAJ regarding property tax case	0.05	
	TOTAL HOURS	8.06	
	Hourly rate		\$ 175.00

Professional services billed \$ 1,410.21

Expenses incurred:

TOTAL DUE: \$ 13,225.66

May 31, 2008 Invoice # 1501

Attn: **Bob Pickle**

> 1354 County Road 21 Halstad, Minnesota 56548

> > Re: Case No. 07-40098 FDS

> > > Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

\$ 13,225.66 **BALANCE FORWARD:**

Professional services rendered through May 31, 2008:

		<u>Hours</u>		
	Telephone call to GAJ regarding IRS, Ebay and production of			
5/1/2008	documents	0.61		
	Telephone call to BP regarding IRS, Ebay and production of			
5/3/2008	documents	0.20		
5/6/2008	Telephone call to GAJ regarding subpoenas	0.77		
	Telephone call to BP regarding IRS, Ebay and production of			
5/25/2008	documents	0.56		
5/28/2008	Telephone call to BP regarding production of documents	0.38		
5/29/2008	Telephone call to GAJ regarding production of documents	0.51		
5/30/2008	Telephone call to BP regarding confidentiality agreement	0.18		
5/31/2008	Telephone call to GAJ regarding confidentiality agreement	0.68		
	TOTAL HOURS	3.89		
	Hourly rate	\$	175.00	
	Professional services billed			\$ 681.04

Expenses incurred:

TOTAL DUE: \$ 13,906.70

June 30, 2008 Invoice # 1522

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

\$

621.25

BALANCE FORWARD: \$ 13,906.70

Professional services rendered through June 30, 2008:

Professional services billed

		<u>Hours</u>	
6/1/2008	Review Fran McDonald emails forwarded from GAJ	1.00	
6/1/2008	Telephone call to GAJ regarding Fran McDonald emails	0.13	
6/2/2008	Review Fran McDonald emails forwarded from GAJ	0.50	
6/2/2008	Telephone call to BP regarding Fran McDonald info	0.22	
6/3/2008	Review Nicholas Miller emails forwarded from GAJ	0.50	
6/3/2008	Telephone call to GAJ regarding Fran McDonald emails	0.32	
6/4/2008	Telephone call to BP regarding confidentiality of documents	0.04	
6/5/2008	Telephone call to BP regarding confidentiality of documents	0.09	
6/8/2008	Telephone call to BP regarding confidentiality of documents Print and return Confidentiality Agreement (while out of the	0.09	
6/8/2008	office on vacation and away from printer/fax)	0.50	
6/9/2008	Telephone call to BP regarding Confidentiality Agreement	0.02	
6/12/2008	Telephone calls to BP regarding Confidentiality Agreement	0.03	
6/13/2008	Telephone calls to BP regarding Confidentiality Agreement	0.09	
6/18/2008	Telephone call to BP regarding Fran McDonald info	0.03	
			_
	TOTAL HOURS	3.55	_
	Hourly rate		\$ 175.00

Expenses incurred:

TOTAL DUE: \$ 14,527.95

July 31, 2008 Invoice # 1548

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

BALANCE FORWARD: \$ 14,527.95

Professional services rendered through July 31, 2008:

		<u>Hours</u>
7/2/2008	Telephone call to GAJ regarding documents	0.72
7/16/2008	Telephone call to BP regarding documents	0.23
7/21/2008	Review of list of provided documents and objections	2.00
7/21/2008	Telephone calls to BP regarding documents	0.36
7/22/2008	Review of non-confidential documents	1.00
7/22/2008	Telephone calls to BP regarding documents	0.45
7/23/2008	Telephone calls to BP regarding documents	0.56
	Read original complaint and initial response with regard to	
7/23/2008	relevancy of documents	1.00
7/23/2008	Obtain and review confidential documents provided	3.50
	Draft follow-up request for documents with regard to missing	
7/23/2008	documents originally requested	2.00
7/23/2008	Prepare email response to trial balance question	0.50
7/23/2008	Telephone conversation with GAJ regarding documents	0.26
7/24/2008	Telephone conversation with BP regarding documents	0.04
7/25/2008	Review Attorney Duffy letter regarding IRS investigation	0.17
7/25/2008	Telephone conversation with BP regarding IRS and documents	0.07
7/27/2008	Review Senator Grassley letters to televangelists	1.50
	Telephone conversation with BP regarding Fran McDonald & trip	
7/27/2008	to Texas	0.09

TOTAL HOURS 14.43

Hourly rate \$ 175.00

Professional services billed \$ 2,525.83

Expenses incurred:

TOTAL DUE: \$ 17,053.78

August 31, 2008 Invoice # 1561

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

794.79

BALANCE FORWARD: \$ 17,053.78

Professional services rendered through August 31, 2008:

Professional services billed

		<u>Hours</u>	
8/3/2008	Telephone call to BP regarding Form 990T	0.35	
8/6/2008	Telephone call to BP regarding Form 990T	0.03	
8/7/2008	Request for US Dream Academy 2001 Form 990	0.25	
8/11/2008	Telephone calls to BP regarding Fran McDonald info	0.34	
	Email exchange with BP regarding Fran McDonald's hard drive		
8/15/2008	and Ebay documents	0.25	
8/19/2008	Telephone call to BP regarding Fran McDonald info	0.28	
8/21/2008	Telephone call to BP regarding Fran McDonald info	0.10	
8/27/2008	Telephone call to BP regarding Fran McDonald info	0.30	
	Telephone call to GAJ regarding disk from Fran McDonald with		
8/27/2008	Ebay info and case update	1.10	
8/28/2008	Telephone call to BP regarding Fran McDonald info	0.25	
8/30/2008	Telephone call to BP regarding UCC filings	0.28	
	Email and telephone call with BP and research regarding UCC		
8/31/2008	filings	1.00	
	TOTAL HOURS	4.54	
	Hourly rate	\$ 175.00	

Expenses incurred:

TOTAL DUE: \$ 17,848.57

September 30, 2008 Invoice # 1589

Attn: Bob Pickle

1354 County Road 21 Halstad, Minnesota 56548

Re: Case No. 07-40098 FDS

Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

\$ 1,634.79

BALANCE FORWARD: \$ 17,848.57

Professional services rendered through September 30, 2008:

		<u>Hours</u>	
	Specific review of 2001-2004 Board of Director and Executive		
9/1/2008	Committee Meeting Minutes and analysis of missing documents	4.00	
	Specific review of 2005 - 4/16/07 Board of Director and		
	Executive Committee Meeting Minutes and analysis of missing		
9/2/2008	documents. Review of Articles of Incorporation and Bylaws.	3.00	
	Telephone call to BP regarding Bill Otterson memo about		
9/2/2008	Nicholas Miller and unauthorized disbursements	0.13	
9/3/2008	Telephone call to BP regarding missing documents	0.05	
	Telephone calls to GAJ regarding missing documents and case		
9/3/2008	update	1.24	
9/5/2008	Telephone calls to BP regarding documents	0.13	
9/7/2008	Telephone call to BP regarding documents	0.05	
9/12/2008	Telephone call to BP regarding documents	0.25	
9/18/2008	Telephone call to BP regarding documents	0.10	
9/22/2008	Telephone call to BP regarding documents	0.22	
9/23/2008	Telephone call to BP regarding documents	0.15	
9/27/2008	Telephone call to BP regarding documents	0.03	
	TOTAL HOURS	9.34	
	Hourly rate	\$	175.00

Expenses incurred:

Professional services billed

TOTAL DUE: \$ 19,483.36

October 31, 2008 Invoice # 1603

Attn: **Bob Pickle**

> 1354 County Road 21 Halstad, Minnesota 56548

> > Case No. 07-40098 FDS Re:

> > > Three Angels Broadcasting Network, Inc and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle

\$ 19,483.36 **BALANCE FORWARD:** Professional services rendered through October 31, 2008: **Hours** 10/8/2008 Telephone call to BP regarding Trust Department 0.19 10/9/2008 Telephone calls to BP regarding Trust Department 0.22 Email and telephone call with BP and research re Illinois gift law 10/12/2008 requirements 1.00 Telephone call with BP regarding Trust Department issues and 10/14/2008 review of emails 2.00 10/24/2008 Telephone call with BP regarding Plaintiffs Motion to Dismiss 0.50 10/31/2008 Telephone call with GAJ regarding case dismissal 1.00 **TOTAL HOURS** 4.91 \$ 175.00 Hourly rate Professional services billed \$ 858.96

Expenses incurred:

TOTAL DUE: \$ 20,342.32

Ex. B Invoice

Laird J. Heal, Esq.

78 Worcester Road P. O. Box 365 Sterling, MA 01564

Date	Invoice #
2008.11.10	7120356

Bill To
Gailon A Joy
P. O. Box 1425
Sterling, MA 01564-0625

Project

Description	Qty	Date	Amount
mail to Arthur Joy giving blank subpoena form	0.33333	2007.07.30	66.67
ravel to hearing	0.5	2007.08.09	100.00
ravel from hearing	0.5	2007.08.09	100.00
Memorandum from Arthur Joy to be submitted with Proposed Order		2007.08.27	66.67
uggest revisions to Arthur Joy's draft, typographical errors		2007.08.27	66.67
econd-final draft of Arthur Joy's memorandum		2007.08.27	66.67
Message to Arthur Joy showing text and format to submit		2007.08.27	66.67
Clarifying whether this office would file the Proposed Order lectronically	0.33333	2007.08.27	66.67
ile the Memorandum and Proposed Order for Arthur Joy	0.33333	2007.08.27	66.67
hank you for your business.			1

78 Worcester Road P. O. Box 365 Sterling, MA 01564

Ex. C Invoice

Date	Invoice #
2008.11.10	7120355

Bill To			
Bob Pickle			

Project

Description	Qty	Date	Amount
5:00 Speak to Bob Pickle and confirm service upon him and joint	0.5	2007.04.30	100.00
representation			
6:00 Investigate save3ABN website	2	2007.05.02	400.00
Spoke to client regarding the basic facts of the case	0.75	2007.05.03	150.00
6:00 Draft Opposition to Motion to Impound	2	2007.05.03	400.00
Receive email from client regarding Remnant Publications	0.25	2007.05.06	50.00
Receive email from client regarding 3ABN	0.25	2007.05.07	50.00
Receive 6 email messages from client regarding Danny Shelton and 3ABN, review	1.91667	2007.05.07	383.33
Receive 3 email messages from client, review	1.5	2007.05.08	300.00
Client email message regarding client's book	0.08333	2007.05.08	16.67
Client email on PTO and IP	0.5	2007.05.08	100.00
Draft letter to client with enclosed documents	0.66667	2007.05.11	133.33
email conversation with client regarding response to Complaint	1.25	2007.05.13	250.00
Client email with exhibit	0.25	2007.05.14	50.00
Client email regarding answer	0.5	2007.05.14	100.00
Draft Motion for A More Definite Statement	2	2007.05.14	400.00
Draft Answer		2007.05.15	400.00
Client email regarding meta tags and chronology	1.05	2007.05.17	210.00
Client email regarding Response to Complaint	0.5	2007.05.18	100.00
Make new draft of Answer including suggestions and corrections	1	2007.05.18	200.00
Client emails regarding answer and corrections	0.5	2007.05.20	100.00
Client email with corrections to Answer	0.25	2007.05.20	50.00
Add corrections to Answer for Bob Pickle	1.5	2007.05.20	300.00
Exhibit from client showing 3ABN-Atlantic Union conneciton	0.25	2007.05.20	50.00
Finish Answer and File	2	2007.05.21	400.00
Client message about need to keep site noncommercial	0.25	2007.05.23	50.00
Client email message about links from save3ABN.com	0.16667	2007.05.23	33.33
Client email message about links	0.25	2007.05.24	50.00
Receive demand for Answer, send another copy and reply.	1	2007.05.25	200.00
Receive Supplemental document filed with Court regarding impoundment, including affdavits, analyze, summarize for clients	1.5	2007.05.28	300.00
Client email asking about the Larry Ewing affidavit	0.25	2007.05.29	50.00

Thank you for your business.

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Date	Invoice #	
2008.11.10	7120355	

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Client message finding more missing from the copy of the pleading	0.25	2007.05.29	50.00
sent this office	0.20	2007102129	20.00
Another indication that the enclosures (affidavits) were incomplete as	0.25	2007.06.04	50.00
served			
Prepare response to supplemental pleading	2	2007.06.04	400.00
Message to client to review draft response.	0.5	2007.06.06	100.00
Draft Motion to strike the supplemental pleading on the basis of its	1	2007.06.08	200.00
shoddy and incorrect service, ask for sanctions			
Draft Motion for Extension of Time occasioned by not getting a	1	2007.06.08	200.00
straight answer from Gailon Joy about what he had filed. Note			
irregularities in service of Supplement by Plaintiffs.			
Client inquiry about Motion for Extension of Time	0.16667	2007.06.08	33.33
Client draft corrections of response to supplemental motion	0.25	2007.06.08	50.00
Final draft of supplemental memorandum	2	2007.06.10	400.00
Send client copy of documents filed (response to 'supplement')		2007.06.11	100.00
File documents (supplemental memorandum in opposition to	1.5	2007.06.11	300.00
impoundment)			
Client message indicating that the web page cited as an error was still	0.25	2007.06.12	50.00
available			
Client message about 3ABN fined in Washington state		2007.06.12	50.00
Client notified this office about Washington Consent Order		2007.06.12	50.00
Facsimile from Jerrie Hayes about missing correspondence; copy to	0.5	2007.06.12	100.00
client, detective work regarding service (DHL)			
Client asking if Dr. Walt Thompson is admitting fraud		2007.06.13	66.67
Note to client about privilege		2007.06.13	66.67
Client note about the land transactions		2007.06.13	50.00
Note to client about missing correspondence		2007.06.13	66.67
Client note about having to appear		2007.06.13	50.00
Note to client about having to appear		2007.06.13	50.00
Client memo about tax-exempt parsonage		2007.06.13	50.00
Client memo rehashing the need to send another copy		2007.06.13	50.00
Client memo about Fjarli		2007.06.13	50.00
Note to client explaining that the lawyer sends copies to client		2007.06.13	50.00
Client note indicating that email copies were adequate	0.25	2007.06.13	50.00

Thank you for your business.

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Date	Invoice #
2008.11.10	7120355

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Client analysis of Fjarli `liability'	0.25	2007.06.13	50.00
Client note about Ewing affidavit vis-a-vis impoundment		2007.06.13	50.00
Client analysis of Ewing Affidavit		2007.06.13	50.00
Client note regarding correspondence		2007.06.13	50.00
Client response to message of Arthur Joy	0.25	2007.06.13	50.00
Client memo on Fjarli 990's	0.25	2007.06.14	50.00
Facsimile message regarding telephone conference	0.25	2007.06.14	50.00
Client memo on response to Hayes	0.25	2007.06.17	50.00
Duplicates without warning	0.5	2007.06.17	100.00
Facsimile from Jerrie Hayes regarding dates for telephonic 26(f) conference	0.33333	2007.06.19	66.67
Client email with PDF of Jerrie Hayes' facsimile	0.25	2007.06.19	50.00
Note to client regarding Jerrie Hayes' gender and following his		2007.06.19	33.33
direction on 26(f) conference	0.10007	2007.00.19	33.33
Client memo on Hayes' fax and timing of 26(f) conference	0.25	2007.06.20	50.00
Duplicates including warning		2007.06.20	100.00
Client note on Amazing Facts		2007.06.20	50.00
Client forward email on Amazing Facts		2007.06.21	100.00
Client note on Amazing Facts officers		2007.06.21	33.33
Correction on earlier Amazing Facts note	0.16667	2007.06.21	33.33
Illinois Attorney General file request		2007.06.21	50.00
Further hearing on issue of impoundment - lifted - and oil on the	2	2007.06.21	400.00
stormy waters in the judge's rulings			
Electronic Order received	0.33333	2007.06.21	66.67
Electronic Order received	0.33333	2007.06.21	66.67
Electronic Order to unseal case	0.33333	2007.06.21	66.67
Clerk Notes of Hearing	0.33333	2007.06.21	66.67
Notice of Scheduling Conference	0.33333	2007.06.21	66.67
Client note on technology	0.25	2007.06.22	50.00
Request for information on Australia	0.25	2007.06.22	50.00
Client note giving links to case related documents following lifting of	0.25	2007.06.22	50.00
gag order			
Client note asking for clarification of who is representing whom	0.25	2007.06.22	50.00

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Date	Invoice #
2008.11.10	7120355

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
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ECF Notice of Transcript (2008.05.10)		2007.06.25	66.67
Client note about being in the lawsuit		2007.06.27	50.00
Client response to Arthur Joy's note to get the 26(f) conference done		2007.06.27	50.00
Client note expressing great temperance with respect to 3ABN's	0.25	2007.06.27	50.00
reputation			
Client note saying that 3ABN & co. are aware that Bob is webmaster	0.25	2007.06.27	50.00
and author			
Client inquiry of whether Stan Jensen has contributed		2007.06.27	50.00
Rule 26(f) conference call		2007.07.02	150.00
Notes for client information of 26(f) conference		2007.07.03	100.00
Client feedback on 26(f) notes		2007.07.05	50.00
Set up ftp server for transfer of files for discovery preparation		2007.07.05	100.00
Help client access ftp server		2007.07.05	50.00
Drafting Rule 26(f) disclosure		2007.07.05	200.00
Client note regarding file type	0.16667	2007.07.06	33.33
Maritime-SDA login provided, forum inspected	0.75	2007.07.06	150.00
Christian-Forums comment	0.16667	2007.07.06	33.33
Client request for further ftp help	0.25	2007.07.06	50.00
Discussion about sources	0.41667	2007.07.06	83.33
Client note pointing to discovery source	0.25	2007.07.06	50.00
Copy of letter to see if Christian-Forums can be accessed	0.16667	2007.07.08	33.33
Client note on status of providing documents	0.16667	2007.07.08	33.33
Client forwarded Christian-Forum thread on Danny and Linda	0.25	2007.07.08	50.00
Client copy of email to Roger Wilson	0.33333	2007.07.09	66.67
Client note about IL Attorney General document request	0.25	2007.07.10	50.00
Forwarded message to 'Ina Fog'	0.33333	2007.07.10	66.67
Forwarded messages from Rick and Jeanette Brantley	0.25	2007.07.10	50.00
Client copy of email message	0.25	2007.07.10	50.00
Client list for automatic disclosure	0.33333	2007.07.10	66.67
Client message including 3ABN affiliation with Seventh-day Adventist	0.25	2007.07.11	50.00
Church			
Client copy of information request	0.25	2007.07.11	50.00
Client message showing Dr. Walt Thompson's son's MySpace page	0.25	2007.07.11	50.00
Client note on file uploads	0.25	2007.07.11	50.00

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Date	Invoice #
2008.11.10	7120355

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Client note on email searches and Base64 encoding	0.25	2007.07.12	50.00
Client response on parishioner who possibly is paying legal bills for	0.25	2007.07.12	50.00
3ABN			
Review of documents	4	2007.07.14	800.00
Review of documents	4	=00/10/112	800.00
Client calll wondering about journalist privilege and discussing discovery	0.16667	2007.07.15	33.33
Client note to be inclusive with automatic discovery	0.25	2007.07.16	50.00
Client inquiry on need to provide index	0.33333	2007.07.16	66.67
Client response to relevance	0.25	2007.07.16	50.00
Reply to client noting the mass of documents being reviewed	0.16667	2007.07.16	33.33
Client concern about copyright issues		2007.07.16	50.00
Client uploading WMF file to view		2007.07.16	50.00
Client repeating that more self-discovery is better		2007.07.16	50.00
Client position on electronic discovery		2007.07.16	50.00
Client intent to include Tommy Shelton information in self-discovery		2007.07.16	50.00
Client note on uploading video		2007.07.16	50.00
Review of 3ABN Live file		2007.07.17	400.00
Client note on being inclusive with self-discovery		2007.07.17	50.00
Client note that video was uploaded		2007.07.17	50.00
Client note to discover everything to avoid any need for electronic discovery	0.25	2007.07.17	50.00
Question about Walter Rowley and client deferring to Arthur Joy	0.25	2007.07.17	50.00
Client message enclosing advertisement of 3ABN as Adventist	0.25	2007.07.17	50.00
Client message regarding Anti-SLAPP	0.25	2007.07.17	50.00
Email link of Anti-SLAPP for client review	0.33333	2007.07.17	66.67
Receive facsimile 26(f) draft from Jerrie Hayes	0.25	2007.07.17	50.00
Email message to Jerrie Hayes acknowledging fax of Rule 26(f) draft	0.33333	2007.07.17	66.67
Electronic-mail facsimile message	0.25	2007.07.17	50.00
Electronic-mail facsimile message (from Hayes to Joy) 25 pp including Plaintiffs' Rule 26(f) Report draft	0.5	2007.07.17	100.00
Electronic-Mail copy (from Jerrie Hayes' assistant) of Rule 26(f) Report draft	0.25	2007.07.17	50.00
Jerrie Hayes message on response after receipt of Plaintiffs' draft	0.33333	2007.07.17	66.67

Thank you for your business.

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Date	Invoice #
2008.11.10	7120355

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Reply to Jerrie Hayes' response	0.5	2007.07.17	100.00
Memo to client on where to conduct legal research and enclosing	0.75	2007.07.17	150.00
decision he had not been able to obtain			
Memo discussing how to search and review the number of	0.25	2007.07.17	50.00
discoverable documents			
Client note of his business dealings and how it behooves him to be	0.25	2007.07.17	50.00
3ABN's friend not foe			
Note from client that further uploads are ongoing and identifying them	0.25	2007.07.17	50.00
Message from Jerrie Hayes accusing defendants of dropping the	0.41667	2007.07.18	83.33
discovery ball			
Response to Jerrie Hayes suggesting that constructive issues be	0.5	2007.07.18	100.00
addressed			
Message from Jerrie Hayes suggesting separate reports		2007.07.18	50.00
Memo to client regarding the neverending Hayes discourse		2007.07.18	50.00
Memo to Arthur Joy about coordinating Rule 26(f) report		2007.07.18	50.00
Client note on further uploading progress		2007.07.18	50.00
Receive Arthur Joy's summary of defendant's claims, review		2007.07.19	100.00
Draft Rule 26(f) report		2007.07.19	600.00
Client note on his review of Defendants' 26(f) report enclosing drafts		2007.07.19	200.00
Client note regarding 26(f) draft		2007.07.19	50.00
Review and redrafting 26(f) report		2007.07.19	200.00
Memo to Arthur Joy on Anti-SLAPP		2007.07.19	116.67
Client proofreading of draft report		2007.07.19	50.00
Client note to Arthur Joy about John Lomacang		2007.07.19	50.00
Draft to client for review		2007.07.19	200.00
Copy of draft to Arthur Joy for review		2007.07.19	3.33
Defendant's Joint Report sent to Hayes		2007.07.19	50.00
Email from Jerrie Hayes rejecting Defendants' choices of language.		2007.07.19	50.00
Note to Jerrie Hayes that separate reports should be submitted as the	0.25	2007.07.19	50.00
time to exchange drafts had run out.			
Email from Jerrie Hayes indicating that separate reports would be	0.25	2007.07.20	50.00
submitted			
Email from client about ASI membership		2007.07.20	50.00
Email from client about ASI-3ABN 'suggestion'	0.25	2007.07.20	50.00

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Date	Invoice #
2008.11.10	7120355

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Email from J. Lizette Richards enclosing 26(f) report	0.25	2007.07.20	50.00
Client response to Plaintiffs' 26(f) report		2007.07.20	50.00
Client response to Frankins 20(1) report Client copies of ECF filings (26(f) reports)		2007.07.20	50.00
Email to J. Lizette Richards confirming transmission of 26(f) reports		2007.07.20	50.00
Email to client containing 26(f) report and comments		2007.07.20	66.67
Client possible clarification to Defendants' report		2007.07.20	33.33
Client note that protective order was not mentioned by Plaintiffs		2007.07.20	33.33
File Rule 26(f) report, serve per rule		2007.07.20	150.00
Received Plaintiffs' 26(f) report		2007.07.20	66.67
Received Flammins 25(f) report as filed		2007.07.20	66.67
Prepare Rule 16.1(d) submission		2007.07.20	800.00
Reply regarding Rule 16.1(d) submission		2007.07.21	50.00
Client email about additional documents		2007.07.21	33.33
Client email about additional documents		2007.07.21	33.33
Review additional documents		2007.07.22	100.00
Client email attaching email note of Walt Thompson		2007.07.22	50.00
Status Conference Hearing		2007.07.23	200.00
Receive notes of hearing, copy client and Arthur Joy		2007.07.23	66.67
Receive Order of Reference		2007.07.23	66.67
Receive Gluer of Reference Receive client response to Arthur Joy's email about beginning of		2007.07.24	66.67
discovery	0.55555	2007.07.24	00.07
Reply requesting information on the site hosting the web server	0.33333	2007.07.24	66.67
Receive copy of facsimile to Arthur Joy from the district court	0.16667	2007.07.24	33.33
Client email with host information for save3ABN.com	0.33333	2007.07.24	66.67
Email to client acknowledging receipt of host contact information	0.33333	2007.07.24	66.67
Further auto discovery review	2	2007.07.24	400.00
Further auto discovery review	2	2007.07.25	400.00
Email from Jerrie Hayes proposing teleconference for 8/1/07 at 2:30	0.33333	2007.07.26	66.67
PM EDT			
Further auto discovery review	2	2007.07.26	400.00
Email to client copying Jerrie Hayes'	0.33333	2007.07.26	66.67
Email from client indicating that hard drive would not be provided	0.33333	2007.07.26	66.67
Response to client mentioning encryption	0.33333	2007.07.27	66.67
Response to updated email discussing Intellectual Property	0.33333	2007.07.27	66.67

Thank you for your business.

78 Worcester Road P. O. Box 365 Sterling, MA 01564

In	VO	ice

Date	Invoice #
2008.11.10	7120355

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Email from client to here and Arthur Joy descrbiing Intellectual	0.5	2007.07.27	100.00
Property rights			
Email from client clarifying the trade secrets		2007.07.27	33.33
Email from client bringing upload period to January 2007		2007.07.27	33.33
Review of Documents		2007.07.28	1,600.00
Review of Documents	8		1,600.00
Facsimile from Jerrie Hayes received to fax server and by email, copy to client		2007.07.30	66.67
Email to client indicating that it might be well to use Loren Heal as a computer 'expert' at least to do the copying at 3ABN, as he lives in Effingham, Illinois.	0.33333	2007.07.30	66.67
Response to Jerrie Hayes noting that no agenda for conference call has been mentioned	0.33333	2007.07.30	66.67
Email from Jerrie Hayes skirting the agenda issue	0.33333	2007.07.30	66.67
Client note giving contacts who might intervene if their data were scheduled to be examined.	0.33333	2007.07.30	66.67
Client email directing attention to Illinois Attorney General charities income list, showing 3ABN had an increase	0.16667	2007.07.30	33.33
Client email giving html chart of 3ABN assets and income	0.25	2007.07.30	50.00
Memo to Jerrie Hayes expressing frustration with lack of definite request for an agenda of what data is desired to examine	0.41667	2007.07.30	83.33
Client email response to memo to Jerrie Hayes concluding that she has as yet proposed nothing.	0.25	2007.07.30	50.00
Note to client that we were certainly standing firm on what would be produced, and insisting that the scope of the discussion be established first and foremost	0.33333	2007.07.30	66.67
Review of Documents	2	2007.07.30	400.00
Client email response to computer expert proposal but actually giving statistics on the number of sensitive transactions his server has recorded.		2007.07.31	66.67
Email to client summarizing the latest issues, including his worries about his data.	0.33333	2007.07.31	66.67
Email to client and Arthur Joy informing them of an anticipatory counterclaim in a similar suit	0.33333	2007.07.31	66.67

Thank you for your business.

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Date	Invoice #	
2008.11.10	7120355	

Bill To			
Bob Pickle			

Project

Description	Qty	Date	Amount
Email to Jerrie Hays asking for clarification, if clarification is an answer in the first place	0.33333	2007.07.31	66.67
Email from Jerrie Hayes listing the types of electronic data sought by plaintiffs to be obtained through discovery	0.33333	2007.07.31	66.67
Email to Arthur Joy asking for less, not more, in communcations to Jerrie Hayes	0.33333	2007.07.31	66.67
Email to client advising that taubmansucks.com website and decision was good guidance on what could be done, after two brief leadin messages	0.33333	2007.07.31	66.67
Email to Arthur Joy asking what progress he had made with the subpoenas	0.33333	2007.07.31	66.67
Email from Jerrie Hayes reiterating the scope of the electronic discovery request	0.5	2007.07.31	100.00
Email from Jerrie Hayes to Arthur Joy indicating that recording the conference would probably not be possible	0.25	2007.07.31	50.00
Email to Jerrie Hayes saying that the format of electronic discovery was in the automatic disclosure and their further comments have not been satisfactory	0.25	2007.07.31	50.00
Review of Documents	2	2007.07.31	400.00
Email to Loren Heal about consulting as an expert.	0.25	2007.08.01	50.00
Facsimile received through email, anonymously accusing Pucci of representing a liar and a thief, with exhibits.	0.5	2007.08.01	100.00
Email facsimile "Joint Declaration of Commitment by SDA and 3ABN	0.33333	2007.08.01	66.67
Email facsimile "To Air is Divine" by Marc Fisher	0.33333	2007.08.01	66.67
Email to/from Loren Heal regarding consulting possibility	0.33333	2007.08.01	66.67
Determine law of electronic discovery	1.33333	2007.08.01	266.67
Email to client giving place where Sedona Principles can be downloaded (PDF)	0.33333	2007.08.01	66.67
Review of Documents	2	2007.08.01	400.00
Email messages from Arthur Joy containing 12 "addendi" to subpoenas - review and edit	1	2007.08.02	200.00
Email message to client and Arthur Joy regarding the content (addendi) of the subpoena requests	0.33333	2007.08.02	66.67

Thank you for your business.

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Date	Invoice #	
2008.11.10	7120355	

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Email message to Arthur Joy regarding subpoena procedure	0.33333	2007.08.02	66.67
Email response by Arthur Joy indicating he would serve subpoenas in	0.33333	2007.08.02	66.67
a particular manner.			
Email from Arthur Joy mollifying his earlier appearance of dogmatism.	0.33333	2007.08.02	66.67
Email to Arthur Joy clarifying concerns, namely the inevitable motions	0.33333	2007.08.02	66.67
to quash subpoenas			
Email from Arthur Joy indicating he was going to serve by DHL	0.33333	2007.08.02	66.67
Email from client relaying announcement that Amazing Facts was	0.16667	2007.08.02	33.33
pulling out of 3ABN merger			
Email from Arthur Joy responding to the merger cancellation	0.16667	2007.08.02	33.33
Review of Documents	2	2007.08.02	400.00
Email responding to merger cancellation	0.25	2007.08.03	50.00
Email to client about the Electronic Self-Discovery DVDs being	0.33333	2007.08.03	66.67
prepared			
Review of Documents	2	2007.08.03	400.00
Copy of Joy's Answer (in MS Word .doc format)	0.33333	2007.08.03	66.67
Create DVD for electronic discovery	1	2007.08.03	200.00
Email asking if there were other matters not covered by Arthur Joy to	0.25	2007.08.03	50.00
issue subpoenas on, also giving DVD directory list.			
Receive Notices of Deposition (misdated) and copy client	0.41667	2007.08.03	83.33
Receive facsimile of Plaintiff Disclosures, review and copy client	1	2007.08.03	200.00
Email facsimile of Plaintiffs' Initial Disclosures	0.16667	2007.08.03	33.33
Email facsimile of Notices of Deposition of Defendants	0.16667	2007.08.03	33.33
Email from client echoing my thoughts on appearing in the prior year	0.16667	2007.08.03	33.33
Email from client responding to the disclosures	0.33333	2007.08.03	66.67
Email from client about acquaintance of Walt Thompson	0.25	2007.08.03	50.00
Email about party issuing notices of deposition	0.25	2007.08.03	50.00
Email responding to questions about disclosures	0.41667	2007.08.03	83.33
Email to Arthur Joy and Client about deficiencies in Plaintiff	0.41667	2007.08.04	83.33
disclosures			
Research to detail failings of Plaintiff disclosures	1.5	2007.08.04	300.00
Email to client about need to make copies at our cost given plaintiff	0.5	2007.08.04	100.00
obstinance			
Further document review for disclosure	4	2007.08.04	800.00

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Date	Invoice #
2008.11.10	7120355

Bill To		
Bob Pickle		

Project

Description	Qty	Date	Amount
Further document review for disclosure	4	2007.08.05	800.00
Email to Arthur Joy noting that merely billing 40 hours per week since	0.25	2007.08.05	50.00
beginning of case would bring the bill to over \$100,000 already, and			
also coordinating subpoena notices.			
Research on Anti-SLAPP, choice of laws and procedure	2	2007.08.05	400.00
Research on Anti-SLAPP, choice of laws and procedure	2	2007.08.06	400.00
Email to client regarding anti-SLAPP	0.33333	2007.08.06	66.67
Draft demand letter for Pucci sent to Arthur Joy and client	1.16667	2007.08.06	233.33
Client response to draft demand letter	0.33333	2007.08.06	66.67
Email to client agreeing with comments on draft	0.33333	2007.08.06	66.67
Continued research on Anti-SLAPP	1	2007.08.06	200.00
Email to client showing Minnesota Anti-SLAPP case	0.33333	2007.08.06	66.67
Email to client enclosing case and repeating mention of the need for a First-Amendment affidavit.	0.08333	2007.08.06	16.67
Statement from client that he was not intending to provoke	0.33333	2007.08.06	66.67
governmental action Receive letter from Jerrie Hayes to court indicating that an evidentiary hearing was needed to help the Court resolve the issue	0.25	2007.08.06	50.00
Email from client analyzing his actions vis-a-vis Anti-SLAPP	0.33333	2007.08.07	66.67
Email from client indicating that I need to ask the clerk to allow video conference for hearing on August 9		2007.08.07	66.67
Call to clerk asking for video conference to be set up from Fargo ND courthouse.	0.16667	2007.08.07	33.33
Facsimile from Jerrie Hayes going to great length to explain why their disclosure did not go to enough length.	0.33333	2007.08.07	66.67
Email from client suggesting he be the computer expert	0.16667	2007.08.07	33.33
Email to client indicating that the court would test a linkage to Fargo courthouse	0.25	2007.08.07	50.00
Email from client offering single correction to draft response to Jerrie Hayes	0.16667	2007.08.08	33.33
Email to client responding to thought that he should be the computer expert	0.33333	2007.08.08	66.67
Letter to Jerrie Hayes and copy to client apologizing for the indignant tone	0.33333	2007.08.08	66.67

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2008.11.10	7120355

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Project

Description	Qty	D (
		Date	Amount
Email to Client and Arthur Joy about pending journalist shield	0.08333	2007.08.09	16.67
litigation			
Email from Arthur Joy regarding evidentiary hearing for afternoon	0.33333	2007.08.09	66.67
Prepare exhibits including Sedona Conventions as amended	2.5	2007.08.09	500.00
Evidentiary Hearing	1.5	2007.08.09	300.00
Email to client about hearing and Paul Levy's call	0.33333	2007.08.09	66.67
Client email of internet chat log regarding case	0.33333	2007.08.09	66.67
Email to client enclosing case and repeating mention of the need for a	0.16667	2007.08.10	33.33
First-Amendment affidavit.			
Client email indicating that Plaintiffs are trying to subvert Sedona	0.33333	2007.08.10	66.67
Principles			
Response to Client indicating that any quibbling about electronic	0.33333	2007.08.10	66.67
discovery should not start to compromise the scope of the discovery,			
which is to not allow it.			
Client response to ask that Sedona principles be incorporated into a	0.33333	2007.08.10	66.67
proposed order			
Email to Arthur Joy about Paul Levy and an appearance to handle the	0.33333	2007.08.11	66.67
IP issues			
Receive by mail Jerries Hayes disclaimer about her disclosures		2007.08.11	100.00
Email from Arthur Joy describing Levy's limitation	0.33333	2007.08.13	66.67
Copy client on court email messages	0.33333	2007.08.13	66.67
Receive Plaintiffs' 16.1 notification from Court	0.25	2007.08.13	50.00
Receive Electronic Order to submit Proposed Order with 14 Days	0.25	2007.08.13	50.00
Research regarding Proposed Order submission	1	2007.08.14	200.00
Research regarding Proposed Order submission	1	2007.08.15	200.00
Research regarding Proposed Order submission	1	2007.08.16	200.00
Note to client that Darrel Mundall has contributed \$500	0.33333	2007.08.17	66.67
Research regarding Proposed Order submission	1	2007.08.17	200.00
Receive by mail Jerries Hayes disclaimer about her disclosures	0.5	2007.08.18	100.00
	0.25	2007.08.20	50.00
Receive Plaintiffs' 16.1 notification from Court	0.25	2007.08.20	50.00
Research regarding Proposed Order submission	1	2007.08.21	200.00
Research regarding Proposed Order submission	1	2007.08.22	200.00
Receive Proposed Order from Plaintiffs	0.33333	2007.08.23	66.67

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In	VO	ice

Date	Invoice #
2008.11.10	7120355

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Project

Description	Qty	Date	Amount
Receive Interrogatories and Requests for Production of Documents	0.25	2007.08.23	50.00
Research regarding Proposed Order submission	1	2007.08.23	200.00
Copy of Proposed Order from Plaintiffs to client and Arthur Joy	0.33333	2007.08.24	66.67
Copy client with Interrogatories and Requests for Production	0.41667	2007.08.24	83.33
Research regarding Proposed Order submission	1	2007.08.24	200.00
Send Client Text of Plaintiff's Proposal	0.25	2007.08.27	50.00
Draft Proposed Order and circulate	1.66667	2007.08.27	333.33
Further draft of Proposed Order including clawback provisions	0.91667	2007.08.27	183.33
Response from Arthur Joy on the Plaintiff's Proposal message	0.16667	2007.08.27	33.33
File the Proposed Order for client	0.33333	2007.08.27	66.67
Facsimile about the Ellen G. White estate	0.25	2007.08.28	50.00
Client email including OCR of the document request	0.33333	2007.08.28	66.67
Arthur Joy email noting that Jim Gilley was the new President of	0.33333	2007.08.31	66.67
3ABN			
Email facsimile including a tract, review, file	0.33333	2007.09.04	66.67
Client request for an amended notice of deposition if any is to be	0.33333	2007.09.04	66.67
issued			
Email facsimile including a tract, review, file	0.33333	2007.09.06	66.67
Email from Gailon Joy indicating that 3ABN was declaring war on the	0.33333	2007.09.07	66.67
internet bloggers, not including themselves, apparently			
Email facsimile including a pastorial aphorism	0.33333	2007.09.07	66.67
Email facsimile of pages 13-17 of 3ABN brief	0.33333	2007.09.09	66.67
Email facsimile of pages 18-22 of 3ABN brief	0.33333	2007.09.09	66.67
Email facsimile of pages 23-27 of 3ABN brief	0.33333	2007.09.09	66.67
Email facsimile of pages 23-27 of 3ABN brief	0.33333	2007.09.09	66.67
Email facsimile of pages 28-32 of 3ABN brief	0.33333	2007.09.09	66.67
Email facsimile of first five pages of 3ABN brief to obtain tax exempt	0.33333	2007.09.09	66.67
status			
Email facsimile of next five pages (3-7) of 3ABN brief	0.33333	2007.09.09	66.67
Email facsimile of pages 8-12 of 3ABN brief	0.33333	2007.09.09	66.67
Telephone call to client indicating that not all pages of 3ABN brief had	0.1	2007.09.09	20.00
gone through and with the response that it would be sent later			
Email facsimile of pages 33-42 of 3ABN brief	0.33333	2007.09.10	66.67
Email facsimile of pages 48-49 of 3ABN brief	0.33333	2007.09.10	66.67

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2008.11.10	7120355

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Description	Qty	Date	Amount
Email facsimile of pages 43-47 of 3ABN brief	0.33333	2007.09.10	66.67
Email to client counseling against putting draft interrogatory answers	0.33333	2007.09.10	66.67
online			
Review Draft Interrogatory Answers	1.5	2007.09.10	300.00
Email from client sharing thoughts on grep and dd as preferred forensic	0.33333	2007.09.11	66.67
tools			
Client email requesting continuance of deposition	0.33333	2007.09.11	66.67
Response to Client and Arthur Joy regarding forensic techniques and	0.33333	2007.09.11	66.67
veracity			
Response to client request to continue deposition asking for	0.33333	2007.09.11	66.67
clarification			
Client further wondering just how much of an expert their forensic data	0.33333	2007.09.11	66.67
expert is			
Client response giving dates for deposition		2007.09.11	66.67
Receive amended notice of deposition for Robert Pickle, copy client		2007.09.11	66.67
Client response to copy of amended notice		2007.09.11	33.33
Answer for client about amended notice		2007.09.11	33.33
Email Facsimile newsletter "The 3ABN Lawsuit"		2007.09.11	66.67
Client copy of letter postponing the Joy deposition		2007.09.18	66.67
Client email containing final draft (signed) of discovery answers,	1	2007.09.18	200.00
review			
Email notes regarding the discovery answers		2007.09.18	66.67
Continued research on Anti-SLAPP		2007.09.18	200.00
Continued research on Anti-SLAPP		2007.09.19	200.00
Further critique, answer by answer, of discovery response		2007.09.20	200.00
Continued research on Anti-SLAPP		2007.09.20	200.00
Call to client to discuss discovery related issues		2007.09.21	50.00
Client indicating that the answers were final and changes would not	0.33333	2007.09.21	66.67
markedly improve them			
Continued research on Anti-SLAPP		2007.09.21	200.00
Response to Client discovery and anti-SLAPP directives		2007.09.21	66.67
Receive Client's discovery documents, review		2007.09.22	1,200.00
Receive Client's discovery documents, review		2007.09.23	800.00
Email facsimile of printed email from "Rosa & Jim Ware", 9 pp.	0.33333	2007.09.24	66.67

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Date	Invoice #
2008.11.10	7120355

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Bob Pickle		

Project

Description	Qty	Date	Amount
Receive Client's discovery documents, review	4	2007.09.24	800.00
Receive Client's discovery documents, review	4	2007.09.25	800.00
Receive Client's discovery documents, review	4	2007.09.26	800.0
Receive Client's discovery documents, review	4	2007.09.27	800.0
Receive Client's discovery documents, review	4	2007.09.28	800.0
Review Discovery Materials	4	2007.09.29	800.0
Review Discovery Materials	4	2007.09.30	800.0
Review Discovery Materials	4	2007.10.01	800.0
Speak with Arthur Joy regarding discovery status (his & client's)	0.25	2007.10.02	50.0
Review Discovery Materials	4	2007.10.02	800.0
Send discovery materials	1	2007.10.03	200.0
Review Discovery Materials	2	2007.10.03	400.0
Confirm discovery sent to client	0.33333	2007.10.04	66.6
Thank you for your business.		Total	\$53,600.2