

STATE OF MINNESOTA  
COUNTY OF MARTIN

IN DISTRICT COURT  
FAMILY DIVISION  
FIFTH JUDICIAL DISTRICT  
Dissolution with Children

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Court File No. 46-FA-19-1151

In Re the Marriage of:

Linda Rae Olson,

Petitioner,

and

**AFFIDAVIT OF JASON C. KOHLMAYER**

Stephen Daniel Olson,

Respondent.

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**COMES NOW** Jason C. Kohlmeyer, being duly sworn upon oath, states and alleges as follows:

1. My name is Jason C. Kohlmeyer and I am Petitioner's attorney. I am duly licensed to practice law in the State of Minnesota. My attorney registration number is 0303963. My office is located at 150 St. Andrews Court, Suite 110, Mankato, Minnesota 56001.
2. Petitioner's discovery requests in the form of Interrogatories and Request for Production of Documents were served upon Respondent via US Mail on March 23, 2020. (See **EXHIBIT 1**). Respondent's discovery responses were due on April 27, 2020.
3. On April 29, 2019, a firm lawyer, David Samb, mailed a deficiency correspondence to Mr. Olson notifying him that his responses were deficient and

requested responses by May 8, 2020 (nearly two weeks after they were due). (See

**EXHIBIT 2)**

4. On May 6, 2020, Respondent called my office and spoke with a paralegal. Respondent said he had received the letter requesting documents by May 8, 2020 but did not plan to produce any documents as doing so would impact his ability to get financing for his farm.
5. On May 14, 2020, I mailed correspondence to Respondent informing him we had scheduled a Motion to Compel hearing. (See **EXHIBIT 3)**.
6. Pursuant to Rule 37.01(b), I certify in good faith that we have attempted to confer with the person or party failing to respond to discovery in an effort to secure the information or material without court action. With trial quickly approaching, I am forced to bring this Motion to Compel.
7. Based upon Respondent's failure to comply with the Rules of Civil Procedure, I am requesting attorneys' fees on behalf of Petitioner pursuant to Rule 37(d) of the Minnesota Rules of Civil Procedure.
8. Petitioner has expended attorneys' fees in the amount of \$845.50 for having to bring this motion. The time spent bringing this motion was 4.3 hours. I charge \$395 per hour, my associate charges \$250 per hour and my paralegal charges \$150 per hour. This rate is consistent with the local market. There are no charges for unnecessary or duplicative work on the billing statement. This work consisted of reviewing all emails, preparing letters to Respondent, serving Respondent with

documents, preparing the motion, preparing this affidavit and exhibits; and filing the documents. The billing statement is attached as **EXHIBIT 4**.

9. Petitioner also incurred a Motion filing fee of \$80 that should be reimbursed by the Respondent.
10. It is anticipated that additional time will be billed in order to prepare for the motion hearing, meet with my client prior to the hearing, and attend the hearing with my client.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT PER MINN. STAT. §358.116.

Dated: May 28, 2020

/s/ Jason C. Kohlmeyer  
Jason C. Kohlmeyer



Jason C. Kohlmeier  
Thomas K. Hagen  
Steven P. Groschen  
Terrance J. Zawacki  
David A. Samb

March 23, 2020

*VIA US MAIL*

Mr. Stephen Olson  
602 254<sup>th</sup> Ave  
Fairmont, MN 56031

**Re: In Re the Marriage of: Linda Rae Olson and Stephen Daniel Olson  
Court File No.: 46-FA-19-1151**

Dear Mr. Olson:

Enclosed herein and served upon you by U.S. Mail, please find the following documents regarding the above matter:

1. Petitioner's Interrogatories to Respondent;
2. Petitioner's Request for Production of Documents; and
3. Affidavit of Service by U.S. Mail.

Sincerely,

/s/Jason C. Kohlmeier

Jason C. Kohlmeier  
[jkohlmeier@khmnlaw.com](mailto:jkohlmeier@khmnlaw.com)

JCK/gmp

Encls.

cc: Ms. Linda Rae Olson (via email only)

**EXHIBIT**




**1**

**MANKATO**

150 St. Andrews Court, Suite #110  
Mankato, MN 56001

**ROCHESTER**

206 S. Broadway, Suite #411A  
Rochester, MN 55904

 507.625.5000  
 507.625.5004  
 [khmnlaw.com](http://khmnlaw.com)

STATE OF MINNESOTA

IN DISTRICT COURT

COUNTY OF MARTIN

FIFTH JUDICIAL DISTRICT  
Case Type: Dissolution with Child  
Court File No. 46-FA-19-1151

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In Re the Marriage of:

Linda Rae Olson,

Petitioner,

and

**PETITIONER'S INTERROGATORIES  
TO RESPONDENT**

Stephen Daniel Olson

Respondent.

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**TO: RESPONDENT ABOVE NAMED, 602 254<sup>th</sup> AVENUE, FAIRMONT, MN  
56031:**

**YOU WILL PLEASE TAKE NOTICE** that Petitioner above-named demands answers, under oath, to the following interrogatories within 30 days of service, pursuant to Rules 26 and 33 of the Minnesota Rules of Civil Procedure. These interrogatories are to be continuing in nature. This means that if new or additional information is discovered by, or becomes known to, you, your attorney, or anyone else acting on your behalf, after you have answered the interrogatories, which would change or add to your responses, you are directed to furnish that information to the Petitioner's attorney immediately.

PLEASE NOTE THAT OBJECTION WILL BE MADE AT OR BEFORE THE TIME OF TRIAL TO ANY ATTEMPT TO INTRODUCE EVIDENCE WHICH IS SOUGHT BY THESE INTERROGATORIES, AND TO WHICH FULL DISCLOSURE HAS NOT BEEN MADE.

## DEFINITIONS AND INSTRUCTIONS

As used in these Interrogatories, the terms listed below are defined as follows:

1. The words “you,” “your,” and “Respondent” refer to the party to which these interrogatories are directed.

2. “Person” means any person, firm, corporation, partnership, proprietorship, joint venture, organization, group of persons or other associations separately identifiable, whether or not such association has a separate legal existence in its own right, and also, any agency board, commission, or other governmental entity of any kind.

3. “Possession,” “custody” or “control” includes the joint or several possession, custody, or control not only by the party to whom these interrogatories are addressed, but also the joint and several possession, custody, or control by each or any other person acting or purporting to act on behalf of the party, whether as employee, attorney, accountant, agent, sponsor, spokesman, or otherwise.

4. The singular form of a word -- e.g. “document” or “person” -- shall also refer to the plural and vice-versa, words used in the masculine, feminine or neutral gender refer to and include all genders, and the disjunctive includes the conjunctive and vice-versa.

5. In the event your Answer to any Interrogatory or subpart thereof is “not applicable” or any similar phrase or answer, you shall describe in detail why the Interrogatory or subpart thereof is not applicable.

6. In the event you Answer to any Interrogatory or subpart thereof is “unknown” or “do not know” or any similar phrase or answer, please explain in detail all efforts made by you or your attorney or representative to obtain all information which would pertain to said Interrogatory or subpart.

7. If, in responding to or failing to respond to these interrogatories, you invoke or rely upon privilege of any kind, state specifically the nature of the privilege, the basis upon which you invoke, rely, or claim it, including statutory or decisional reference, and identify all documents or other information, including contracts and communications which you believe to be embraced by the privilege invoked.

8. These interrogatories are deemed to be continuing in nature and should you, your counsel, or anyone representing your interests become aware of or acquire any additional knowledge or information which affects the completeness or accuracy of any answers to these interrogatories, or if any witnesses are added, it is hereby demanded that such knowledge or information be immediately transmitted to the undersigned by way of supplemental answer and by way of giving timely notice thereof.

## INTERROGATORIES

1. **Employment History.** Set forth with particularity all employment you've held in the past 5 years, stating for each such job:

- a. The name and address of your employer.
- b. Your job title.
- c. The dates of your employment.
- d. The responsibilities and/or tasks you were to perform.

2. **Education and Skills.** Set forth with particularity your education and all certificates, degrees, licenses, and other employment-related skills you have acquired. For each, state when it was received and from where.

3. **Financial Accounts.** State the name and address of each financial institution in which you have or have had any interest in any financial accounts, including savings accounts, checking accounts, investment accounts, retirement accounts, trust accounts or certificates of deposit for any other accounts during the past 5 years. In each case, please state:

- a. The name and address of bank or financial institution.
- b. The number of the account or certificate.
- c. The stated ownership of the account or certificate.
- d. The balance in each account or value of each certificate. If account has been closed, the balance withdrawn at closing and the date the account was closed.

5. **Real Estate.** Do you now have any ownership interest in any real estate? If so, for each property state:

- a. The nature of the property and the extent of your interest therein
- b. The address of the property.
- c. The date and mode of acquisition by you, whether by purchase, gift, inheritance, or otherwise
- d. The purchase price or, if otherwise acquired, the value at the time of acquisition.
- e. The extent of current encumbrance and the amount of the monthly payments thereon.
- f. The approximate present value and the source of such valuation.

- g. The monthly rental derived therefrom in the case of rental property.
- h. The sources of down payment and purchase price of the property.

6. **All Cash Assets.** List any other cash assets that you claim interest in or have access to, including but not limited to, foreign currency, precious metals, checks, drafts, money orders, and traveler's checks.

7. **Life Insurance.** For each policy of life insurance in which you have an interest as owner, beneficiary, or insured, state the name of the insurer, the type of policy, the policy number, the amount of insurance, the present cash value of the policy, the owner, and the beneficiary.

8. **Safe Deposit Box.** If you have a safe deposit box, state the date you commenced rental of the box, the name and address of the bank, and the itemized contents thereof, and state the names of all persons who have access to the box.

9. **Assets Held On Your Behalf.** If you have an interest in any asset being held on your behalf by a person or persons other than yourself or your spouse, state the person or entity holding the asset and describe the circumstances under which they are holding the asset as well as the current fair market value and how you determined the value.

10. **Assets Held.** If you are holding any asset for persons other than yourself or your spouse, set forth with particularity each asset, the circumstances under which you are holding it, and identify the owner or owners of each such asset.

11. **Trusts.** If you are the settlor, beneficiary, or trustee of any trust, describe the trust and your interest therein fully.

12. **Present Indebtedness.** List your present indebtedness, setting forth for each

debt:

- a. The name of the creditor.
- b. Whether the account is solely in your name or a joint obligation with any other party and, if joint, the names and addresses of any other obligees.
- c. The nature of the indebtedness.
- d. The original date and amount of indebtedness.
- e. The present balance due.
- f. The terms of repayment.
- g. The nature of collateral, if any.

13. **Stock Shares.** Do you own, either legally or equitably as a pledgee or nominee, any shares of stock of any corporation or any rights, warrants to, or options to purchase such stock? If so, please identify as to each of the shares:

- a. Issuing corporation.
- b. The number of shares of each class owned by you.
- c. The date and mode of acquisition by you, whether by purchase, gift, inheritance, or otherwise.
- d. The purchase price or, if otherwise acquired, the value at the time of acquisition.
- e. The present market value of each such share, stating your source for such valuation.

14. **Bonds.** Do you own any bonds or debentures, including savings bonds? If so, state as to each of such bonds:

- a. The name of the issuing entity.
- b. The date of acquisition by you.
- c. Identify method of purchase whether by purchase, gift, inheritance, or otherwise.
- d. The maturity or due date.
- e. The present value and the source of such valuation.

15. **Retirement Accounts.** List each retirement account, including but not limited to 401(k), 403(b), Pension, Profit sharing, IRA or SEP plans that you currently have an interest, or have had in interest in for the past 5 years, include:

- a. Name of account
- b. Date opened

- c. Current value
  - d. Date of value at marriage
  - e. If the account is a pension, include your projected monthly income.
16. **Motor Vehicles.** List all motor vehicles in which you have an interest including:
- a. Make, model & year of vehicle.
  - b. Date purchased
  - c. Present value, and the source of such valuation.
  - d. If encumbered, list terms of repayment including monthly cost and length of payment.
17. **Other Items of Property.** List all other items of property in which you have an interest, with a value of \$500 or more than, setting forth, in regard to each item:
- a. The type of the property and its location.
  - b. The date and method of acquisition, whether by purchase, gift, inheritance, or otherwise.
  - c. The purchase price or, if otherwise acquired, the value at the time of acquisition.
  - d. The amount of encumbrance on each item, if any.
  - e. If encumbered, list terms of repayment including monthly cost and length of payment.
  - f. The present value of said property and the source of such valuation.
18. **Transfers of Property.** List any transfers of any property (including, but not limited to real property, personal property and financial assets) in which you have made since January 1, 2018, including the following:
- a. Item transferred.
  - b. To whom it was transferred to.
  - c. If any compensation was given for transfer list amount received.
  - d. Value of item at the time of transfer.
19. **Marital Estate.** Describe your desired disposition of all property and debts included in the marital estate. Additionally, describe your position as to the value of all property and debts in the marital estate, and describe the basis upon which you formulate your position.

20. **Monthly Living Expenses.** Set forth with particularity an itemized breakdown of your average monthly living expenses. If you expect your monthly living expenses to change in the next twelve months, itemize the expected changes and explain the reasons for each expected change.

21. **Non-marital Property.** Do you claim any assets as non-marital? If so, please state for each:

- a. Description of the item.
- b. Current estimated value and basis for valuation.
- c. How acquired when, and value at the time of acquisition.
- d. Basis for claiming property as non-marital.

22. Set forth what you propose for custody of the minor child and all the facts upon which you will rely in support of your position. State whether in your opinion the Petitioner is fit to be awarded custody of the minor child. If your answer is no, state all facts upon which you rely in support of your position, giving specific dates, times, places and other individuals involved. If it is your contention that the best interests and welfare of the minor child will be served by granting custody to you rather than the Petitioner, set forth all facts upon which you rely in reaching this conclusion.

23. Provide the date, full names of the parties, county, cause of action, and court file number of all other civil proceedings not listed above in which you have been a party, including proceedings from other states.

24. Set forth all facts upon which you rely in denying Petitioner's proposal for custody and parenting time including the following factors:

- a. The child's physical, emotional, cultural, spiritual, and other needs, and the effect of the proposed arrangements on the child's needs and development;
- b. Any special medical, mental health, or educational needs that the child may have that may require special parenting arrangements or access to recommended services;
- c. The reasonable preference of the child, if the court deems the child to be of sufficient ability, age, and maturity to express an independent, reliable preference;
- d. Whether domestic abuse has occurred between the and the parent of your child or in either parent's household or relationship; the nature and context of the domestic abuse; and the implications of the domestic abuse for parenting and for the child's safety, well-being, and developmental needs;
- e. Any physical, mental, or chemical health issue of a parent that affects the child's safety or developmental needs;
- f. The history and nature of each parent's participation in providing care for the child;
- g. Each parent's willingness and ability to provide ongoing care for the child; to meet the child's ongoing developmental, emotional, spiritual, and cultural needs; and to maintain consistency and follow through with parenting time;
- h. The effect on the child's well-being and development of changes to home, school, and community;
- i. The effect of the proposed arrangements on the ongoing relationships between the child and each parent, siblings, and other significant persons in the child's life;
- j. The benefit to the child in maximizing parenting time with both parents and the detriment to the child in limiting parenting time with either parent;
- k. The disposition of each parent to support the child's relationship with the other parent and to encourage and permit frequent and continuing contact between the child and the other parent;

- l. The willingness and ability of parents to cooperate in the rearing of their child; to maximize sharing information and minimize exposure of the child to parental conflict; and to utilize methods for resolving disputes regarding any major decision concerning the life of the child;
- m. Substantial reasons for the court to find that the Petitioner is not capable of having the capacity to develop and sustain nurturing relationships with their child; and
- n. Reports by either you or the Petitioner that a person has committed sexual abuse, physical abuse, or neglect of a child, knowing that the allegation is false or is without reason to believe that the alleged abuser committed the abuse or neglect; and made with the intent that the information influence a child custody hearing.

Dated: March 23, 2020

**KOHLMEYER HAGEN,  
Law Office Chtd.**

By: /s/ Jason C. Kohlmeyer  
Jason C. Kohlmeyer  
Attorney for Petitioner  
Attorney No.: 0303963  
150 St. Andrews Court, Suite 110  
Mankato, Minnesota 56001  
(507) 625-5000  
[jkohlmeyer@kbmnlaw.com](mailto:jkohlmeyer@kbmnlaw.com)

STATE OF MINNESOTA

IN DISTRICT COURT

COUNTY OF MARTIN

FIFTH JUDICIAL DISTRICT  
Case Type: Dissolution with Child  
Court File No. 46-FA-19-1151

---

In Re the Marriage of:

Linda Rae Olson,

Petitioner,

and

**PETITIONER'S REQUEST FOR  
PRODUCTION OF DOCUMENTS**

Stephen Daniel Olson,

Respondent.

---

**TO: RESPONDENT ABOVE NAMED, 602 254<sup>th</sup> AVENUE, FAIRMONT, MN  
56031:**

Pursuant to Rule 34 of the Minnesota Rules of Civil Procedure, demand is hereby made on you to answer the following Demand for Production of Documents under oath in writing, and that you serve your answers and provide documents as demanded to upon the undersigned attorney at 150 St. Andrews Court, Suite 110, Mankato, MN 56001 within 30 days after service of these Demand for Production of Documents upon you.

The Requests are continuing in nature and if you obtain, discover or have knowledge of additional information which would cause you to amend to supplement any of your answers, demand is hereby made upon you to disclose such information immediately upon receipt and so amend or supplement your answer(s).

1. All documents, records, notes, and files used or referred to in answering Petitioner's Interrogatories.

2. All documents which reflect any income received by you from January 1, 2016, to the present including, but not limited to:
  - a. Federal and State Tax Returns and/or all other Tax-related documents;
  - b. IRS Forms W-2, 1099, and K-1;
  - c. paycheck stubs (last three months);
  - d. bonus check stubs;
  - e. income receipts or vouchers;
  - f. expense reimbursement records;
  - g. dividend or interest statements; and
  - h. rental income records.
3. All documents that detail or reflect any interest that you have had at any time during the period from the date of your marriage to the date of your response to this Request in any vested and unvested employment benefits including, but not limited to:
  - a. bonus or incentive plans;
  - b. benefit booklets;
  - c. medical, dental, health, disability, and life insurance policies;
  - d. any other retirement plans.
4. All financial statements prepared by you or on your behalf at any time during the period from January 1, 2016 to the date of your response to this Request.
5. All personal financial account records for the period from January 1, 2016 to the date of your response to this Request, for any joint or separate account, including but not limited to, checking, savings, credit union, money market, and brokerage firm accounts, used by you, or in which you have or have had any interest at any time during said period, specifically including account statements.
6. All documents relating to any contingent assets or expectancies, such as annuities, trusts, wills, probate and estate records and evidence of distributions.
7. All documents for the period from the date of your marriage to the date of your response to this Request relating to any joint and/or separate interest you have or have had in and to any stock, bonds, debentures, Treasury Bills, notes, or other investments at any time during said period.
8. All documents from the period from the date of your marriage to the date of your response to this Request pertaining to any retirement assets including, but not limited to, retirement savings accounts, 401(k), other pension benefits, IRAs, and Roth IRAs in which you had any interest during said period, regardless of whether you are fully vested, specifically including individual account statements.

9. All documents relating to any real property in which you have or have had any interest at any time during the period from the date of your marriage to the present, jointly or individually, specifically including:
  - a. purchase agreements;
  - b. closing documents; and
  - c. appraisals.
10. All documents relating to insurance assets in which you have or have had any interest at any time during the period from the date of your marriage to the present, jointly or individually, specifically including:
  - a. copies of each policy;
  - b. loan statements;
  - c. premium statements; and
  - d. statements of actual or projected cash value.
11. All documents from January 1, 2016 to the present evidencing any debts that you have incurred, jointly or individually, specifically including:
  - a. promissory notes;
  - b. invoices;
  - c. bills;
  - d. credit card statements; and
  - e. other account statements.
12. All documentation, including estimated values, pertaining to motor vehicles, boats, recreational vehicles and farm equipment in which you have any interest.
13. All documents, records, notes and files that establish, support, trace, and/or prove your claims of non-marital contributions or entitlements.
14. All documents, records, notes and files that establish, support, trace, and/or prove your claims to non-marital real or personal property.
15. All documents, records, notes, and files, not already provided in response to any of the foregoing requests, relating to any assets worth more than \$500.00 in which you have an interest in.
16. Copies of all invoices, records and other documentation used by you in connection with the calculation of any budget for your monthly living expenses, together with any other work papers created by you or on your behalf in connection with budget preparation.

Dated: March 23, 2020

**KOHLMEYER HAGEN,  
Law Office Chtd.**

By: /s/ Jason C. Kohlmeier  
Jason C. Kohlmeier  
Attorney for Petitioner  
Attorney No.: 0303963  
150 St. Andrews Court, Suite 110  
Mankato, Minnesota 56001  
(507) 625-5000  
[jkohlmeier@kbmnlaw.com](mailto:jkohlmeier@kbmnlaw.com)

STATE OF MINNESOTA            )  
  ) ss.       AFFIDAVIT OF SERVICE  
COUNTY OF BLUE EARTH        )       BY U.S. MAIL

Brandi Forstner of Kohlmeyer Hagen, Law Office Chtd., 150 St. Andrews Court, Suite 110, Mankato, MN 56001, being first duly sworn, deposes and states that on March 23, 2020 I served the attached documents:

1.     Petitioner's Interrogatories to Respondent; and
2.     Petitioner's Request for Production of Documents

Upon Respondent, Stephen Daniel Olson, by depositing true and correct copies thereof in the U.S. Mail in the City of Mankato, Blue Earth County, Minnesota, with postage prepaid, in an envelope directed and addressed to said individual as follows:

Stephen Daniel Olson  
602 254<sup>th</sup> Avenue  
Fairmont, MN 56031

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT PER MINN. STAT. §358.116.

/s/ Brandi Forstner  
Brandi Forstner



Jason C. Kohlmeyer  
Thomas K. Hagen  
Steven P. Groschen  
Terrance J. Zawacki  
David A. Samb

April 29, 2020

VIA US MAIL

Mr. Stephen Olson  
602 254th Ave  
Fairmont, MN 56031

Re: **In Re the Marriage of: Linda Rae Olson and Stephen Daniel Olson**  
Court File No. 46-FA-19-1151

Dear Mr. Olson:

We have not received your responses to Petitioner's Interrogatories and Requests for Production of Documents that were mailed to you on March 23, 2020. Your responses were due on April 27, 2020.

We are now requesting either your responses or correspondence stating when you will have your responses to us by **May 8, 2020**, or we will be forced to file a motion to compel and seek appropriate attorneys' fees.

Sincerely,

*/s/ David A. Samb*

David A. Samb  
[dsamb@khmnlaw.com](mailto:dsamb@khmnlaw.com)

DAS:gmp

cc: Ms. Linda Olson (via email only)




**EXHIBIT**  
**2**

**MANKATO**

150 St. Andrews Court, Suite #110  
Mankato, MN 56001

**ROCHESTER**

206 S. Broadway, Suite #411A  
Rochester, MN 55904

 507.625.5000  
 507.625.5004  
 [khmnlaw.com](http://khmnlaw.com)

May 14, 2020

VIA US MAIL

Mr. Stephen Olson  
602 254<sup>th</sup> Ave  
Fairmont, MN 56031

**Re: In Re the Marriage of: Linda Rae Olson and Stephen Daniel Olson  
Court File No.: 46-FA-19-1151**

Dear Mr. Olson:

I am writing to inform you that a Motion to Compel Hearing has been scheduled for June 19 2020 at 10:30 a.m. The hearing will take place via telephone conference. The directions for attending the telephone conference are below:

1. Call the following number at the designated hearing time: **1-888-742-5095**
2. Enter the conference code when prompted which is: **3856546827#** (make sure to use the # sign)

The reason for the hearing is you have failed to answer the interrogatories and request for production of documents as required by Minn. R. Civ. P. 26. You will be served with the motion papers as the rule requires.

Very truly yours,

/s/ Jason Kohlmeyer

Jason Kohlmeyer  
jkohlmeyer@khhmlaw.com

JCK/bf

cc: Ms. Linda Olson (via email)

**EXHIBIT**

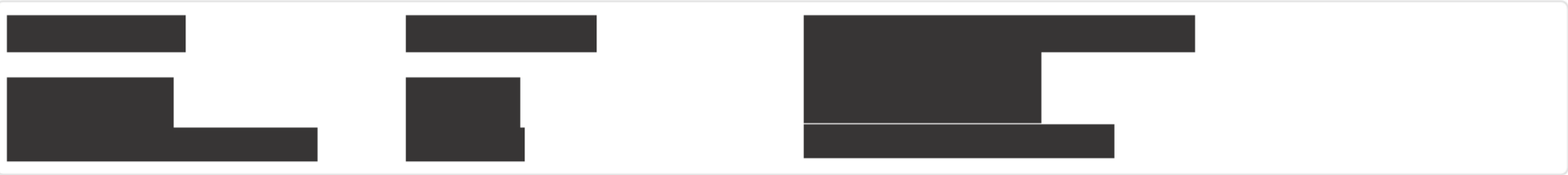
**3**

# Olson, Linda v. Stephen Olson - JCK

Case details generated 05/27/2020

Date Range: 04/29/2020 - 05/27/2020

Add Time Entry



Text Size 00

DATE	ACTIVITY	DURATION	DESCRIPTION	RATE	TOTAL	STATUS	USER
May 27, 2020	Paralegal Activity	0.5	efiled notice of motion and motion, affidavit of JCK, and exhibits, uploaded all documents to mycase and shared with client	\$150.00/hr	\$75.00	Open	Brandi L Forstner
May 27, 2020	Paralegal Activity	0.5	Draft letter to OPP serving motion & affidavit, draft aff of service, prepare exhibits, finalize all documents for efilng and service by mail. Mailed documents.	\$150.00/hr	\$75.00	Open	Brandi L Forstner
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
May 27, 2020	Jason Kohlmeyer Hourly	0.7	edit Motion to Compel, Affidavit.	\$395.00/hr	\$276.50	Open	Jason C Kohlmeyer
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Samb
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
May 20, 2020	Paralegal Activity	0.5	finish drafting motion to compel documents, sent to Jason for approval	\$150.00/hr	\$75.00	Open	Brandi L Forstner
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
May 18, 2020	Paralegal Activity	0.3	drafted letter and aff of service, sent to Dave to approve. Printed all documents and mailed.	\$150.00/hr	\$45.00	Open	Brandi L Forstner
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
May 14, 2020	Paralegal Activity	0.1	finalized, printed, and mailed letter to Stephen re: notice of motion hearing	\$150.00/hr	\$15.00	Open	Brandi L Forstner
May 13, 2020	Paralegal Activity	0.6	drafted motion to compel, affidavit	\$150.00/hr	\$90.00	Open	Brandi L Forstner
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	Samb
May 13, 2020	Paralegal Activity	0.1	finish drafting letter to OPP re: notice of motion hearing	\$150.00/hr	\$15.00	Open	Brandi L Forstner
May 13, 2020	Paralegal Activity	0.2	emails with Court re: motion date. Called Linda re: motion hearing date scheduled for 6/19	\$150.00/hr	\$30.00	Open	Brandi L Forstner
May 12, 2020	Paralegal Activity	0.1	email to ct admin re: date for motion to compel hearing	\$150.00/hr	\$15.00	Open	Brandi L Forstner
May 12, 2020	Paralegal Activity	0.1	draft letter to opposing party re: motion to compel hearing	\$150.00/hr	\$15.00	Open	Brandi L Forstner
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
May 6, 2020	Paralegal Activity	0.2	Phone call with Stephen Olson re: discovery requests	\$150.00/hr	\$30.00	Open	Brandi L Forstner

DATE	ACTIVITY	DURATION	DESCRIPTION	RATE	TOTAL	STATUS	USER
Apr 29, 2020	Gayle Parish - Paralegal Hourly	0.2	Organize correspondence to opposing party regarding overdue discovery responses.	\$150.00/hr	\$30.00	Invoiced	Gayle M. Parish
Apr 29, 2020	David Samb - Hourly	0.2	Draft letter to opposing party.	\$295.00/hr	\$59.00	Invoiced	David A. Samb

**TOTAL HOURS: 4.3****TOTAL BILLED: \$845.50**