

NEIL A. GROVER
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*Via Electronic Mail and
Hand Delivery*
December 20, 2013

Kirk Petroski, City Clerk
Martin Luther King, Jr., City Gov't Center
10 North 2nd Street, Suite 1, Lower Level
Harrisburg, PA 17101-1678
EMAIL: kpetroski@cityofhbg.com

Re: Summary Statement of Fees and Costs for Legal Services

Dear Kirk:

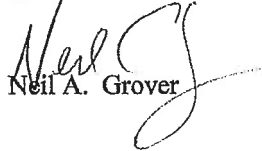
Attached please find

1. A *Summary Statement of Fees and Costs for Legal Services* to the City Council.
2. A related Invoice for a portion of legal services rendered on the parking transaction, submitted to be paid in the closing costs.
3. A copy of the executed and approved *Letter of Representation and Fee Agreement*
4. A copy of the W-9 submitted in July 2012

Thank you for your continued help and dedication to the City and its many long suffering and deserving people.

Sincerely,

LAW OFFICE OF NEIL A. GROVER


Neil A. Grover

NAG\
Encs.

cc: Wanda R. D. Williams, President
of Harrisburg City Council
Members of Council
William Lynch, Receiver
Robert J. Philbin, COO
Jason Hess, Solicitor

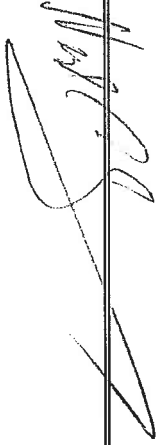
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Wanda R. D. Williams, President
Harrisburg City Council
c/o Kirk Petroski, City Clerk
Martin Luther King, Jr., City Gov't Center
10 North 2nd Street, Suite 1, Lower Level
Harrisburg, PA 17101-1678

For Professional Services Rendered by Neil A. Grover, Esquire, with Assisting Counsel*



**SUMMARY STATEMENT
OF FEES AND COSTS
FOR LEGAL SERVICES**

In Re: For Legal Representation, Advice and Counsel in Matters of the Receivership of the City of Harrisburg, Act 47, the Harrisburg Strong Plan and Related Matters, By Special Council to and for the City Council of Harrisburg, Pennsylvania and its Members

<u>Dates of Service</u>	<u>Description of Services</u>	July 2012 (Beginning 07/23/12)	<u>Amounts</u>
July 23, 2012	Provide comprehensive legal services to City Council and members, including: defense and contest of Mandamus proceeding in Commonwealth Court and preparation of matter for immediate appeal to PA Supreme Court;	NAG* 71.25 LEM* 32.00 BCG* .30	
to July 31, 2012	reconsideration and stay proceedings before Commonwealth	Monthly Total 103.55 hours @85/hr	\$8,801.75

Hours

Dates of Service	Description of Services	Hours	Amounts	
Aug 2012 - Dec 2012	Court, negotiations and coordination of stipulations and agreements of the Council and the Office of Receiver; in depth, ongoing strategy, reviews and updates of issues under original Recovery Plan and subsequent Harrisburg Strong Plan; research, propose, edit, approve and advise on legislation regarding EIT, renegotiated union contracts, transfer of water-sewer services and property; parking transaction, and RRF sale; review parking transaction proposals and deal structures, including host of related agreements and supporting documentation; review RRF sale agreements, related agreements including waste disposal contracts, and supporting documentation; review, monitor, and comment upon the governing and secondary documents drafted in the course of the parking transaction; routinely advise, communicate and update the positions and policies of City Council to representatives of the Office of Receiver; oversee and/or assist in the coordination of hearing witnesses for HSP related legislation within committee hearings and voting sessions; coordinate and communicate to retain independent financial advisers to advise council on aspects of HSP; coordinate and communicate to retain special bond counsel for City and Council for parking transaction; advise and review information with individual Council Members and the Council; and monitor and negotiate to secure the provisions of City benefits proposed in the HSP throughout course of development of transaction details; review and comment on all settlement agreements with creditors; and review and approve primary settlement agreement with primary creditors and receiver for compliance in accordance with ordinance mandates.	Aug 2012		
		NAG	216.45	
		LEM	50.1	
		BCG	18.5	
		<i>Monthly Total</i>	285.05 hrs @ \$85/hr	\$24,229.50
		Sept 2012		
		NAG	131.2	
		LM	4.5	
		<i>Monthly Total</i>	135.7 hrs @ \$85/hr	\$11,534.50
		Oct 2012		
	207.75 hrs @ \$85/hr	\$17,658.75		
	(all remaining entries NAG only)			
Nov 2012				
	18.65 hrs @ \$85/hr	\$1,585.25		
Dec 2012				
	21.25 hrs @ \$85/hr	\$1,806.25		
	2012 Total Fees		\$65,615.75	
	771.95 hours		\$ 1921.00	
Jan 2013				
	22.6 hrs @ \$85/hr			

<u>Dates of Service</u>	<u>Description of Services</u>	<u>Hours</u>	<u>Amounts</u>
Feb 2013 - Sept 2013	<p>Please Note: This is a summary of time worked on the matters requested by City Council in the course of Receivership. More detailed records can be provided, but this is submitted to serve as an invoice for services rendered in these complex matters.</p> <p>Counsel has incurred costs in excess of \$2,000.00, associated with train travel, meeting attendance, significant cell phone minute overages on a 2000 minute per month plan, significant printing and copying charges, court fees for issuance of subpoenas of potential witnesses, the cost of hearing transcripts and other miscellaneous costs. These are not being billed as a courtesy to the City.</p> <p>Litigation on the City Council's right to receive these paid outside legal services in this matter had been before the Commonwealth Court. It is the undersigned Counsel's understanding that the matter is no longer disputed by and with the Office of Receiver.</p>	<p>Feb 2013 11.00 hrs @\$85/hr</p> <p>March 2013 17.25 hrs @\$85/hr</p> <p>April 2013 12.9 hrs @\$85/hr</p> <p>May 2013 171.0 hrs @\$85/hr</p> <p>June 2013 227.75 hrs @85/hr</p> <p>July 2013 235.4 hrs @\$85/hr</p> <p>Aug 2013 248.50 hrs @\$85/hr</p> <p>Sept 2013 279.25 hrs @\$85/hr</p>	<p>\$ 935.00</p> <p>\$ 1466.25</p> <p>\$ 1096.50</p> <p>\$14,535.00</p> <p>\$19,358.75</p> <p>\$20,009.00</p> <p>\$21,122.50</p> <p>\$23,736.25</p>

<u>Dates of Service</u>	<u>Description of Services</u>	<u>Hours</u>	<u>Amounts</u>
Oct 2013 - Dec 19, 2013			
		Oct 2013	231.9 hrs @ \$85/hr
			\$19,711.50
		Nov 2013	221.25 hrs @ \$85/hr
			\$18,806.25
		Dec 2013 (thru 12/19/12)	157.25 hrs @ \$85 /hr
			<u>\$13,366.25</u>
		2013 Total Fees	<u>\$156,064.25</u>
		1836.05 hours @ \$85.00/hr	
		ATTORNEYS' FEES	
		TOTAL BALANCE	\$221,680.00
		<i>Attorney Fees to be Paid from Proceeds of Parking Transaction</i>	<u>\$50,000.00</u>
		BALANCE DUE:	\$171,680.00

* At the commencement of this legal representation, experienced Assisting Counsel also were representing City Council in the Mandamus proceedings. Lee E. Morrison, Esquire (LEM) and Bruce C. Grossman, Esquire (BCG), assisted in legal strategy, preparation, analysis, legal research, drafting and presentation at the Mandamus hearing and related proceedings. Neil A. Grover, Esquire, (NAG) will be responsible to make payment to these attorneys, who agreed to work at the same discounted hourly rate set forth in the approved and executed Letter of Representation and Fee Agreement.

RATE COMPARISON

This Statement is for a total of 2608 hours of legal services at an agreed discounted hourly rate. The value of that discount for the City of Harrisburg can be readily determined

- Discounted Rate: A charge for 2608 hours worked @ \$85.00 per hour is the stated sum of \$221,680.00.
- Federal EAJA Rate: A charge for 2068 hours worked at the rate provided under federal law for legal services in certain governmental disputes (per the Equal Access to Justice Act, 28 U.S.C. § 2412(d)(2)(A)), currently stands @ \$187.50 per hour. When this per se reasonable governmental rate is applied, fees incurred would equal the sum of \$489,000.00.
- Standard Hourly Rate: A charge for 2068 hours worked @\$300.00 per hour, a standard rate for such professional services by Attorney Grover, fees incurred would equal the sum of \$620,400.00.

The fees incurred in these complex matters be provides at a discount of roughly \$400,000.00.