

EXHIBIT D

The Russell Firm
233 S. Wacker Drive
84th Floor
Chicago IL 60606

Paul Godfread

Invoice #	0000001
Invoice Date	February 7, 2014
Amount Due	\$22,454.20 USD

Task	Time Entry Notes	Rate	Hours	Line Total
Time	[Prenda v. Godfread, et al. 03/01/13] Received and reviewed email from Paul Duffy re: alleged amended complaint.	400.00	0.1	40.00
Time	[Prenda v. Godfread, et al. 03/01/13] Email to Paul Duffy requesting copy of purported amended St. Clair County complaint.	400.00	0.1	40.00
Time	[Prenda v. Godfread, et al. 03/01/13] Reviewed St. Clair County Court docket re: alleged amended complaint	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 03/01/13] Telephone conference with P. Godfread re: alleged amended complaint	400.00	0.6	240.00
Time	[Prenda v. Godfread, et al. 03/01/13] Telephone conference with A. Cooper re: alleged amended complaint	400.00	0.2	80.00
Time	[Prenda v. Godfread, et al. 03/02/13] Telephone conference with P. Godfread re: alleged amended complaint	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 03/11/13] Telephone conference with J. Sweet and P. Godfread re: allegations contained in Plaintiff's Motion to Remand	400.00	1.1	440.00
Time	[Prenda v. Godfread, et al. 04/10/13] Received and reviewed Plaintiff's Motion to Remand to St. Clair County	400.00	1	400.00
Time	[Prenda v. Godfread, et al. 04/10/13] Telephone conference with P. Godfread re: Motion to Remand	400.00	0.5	200.00
Time	[Prenda v. Godfread, et al. 04/10/13] Confer with A. Cooper.	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 04/12/13] Investigate circumstances surrounding filing of alleged amended complaint in St. Clair County (telephone calls to clerk's office and local counsel).	400.00	1.2	480.00
Time	[Prenda v. Godfread, et al. 04/15/13] Listen to voice mail left for P. Godfread by J. Steele and arrange for preparation of transcript.	400.00	1	400.00
Time	[Prenda v. Godfread, et al. 04/16/13] Research: Illinois law governing filing of amended complaints in removed cases.	400.00	1.7	680.00
Time	[Prenda v. Godfread, et al. 04/17/13] Draft facts section for Response to Motion for Remand.	400.00	1.4	560.00

Task	Time Entry Notes	Rate	Hours	Line Total
Time	[Prenda v. Godfread, et al. 04/17/13] Research: amended complaints, service and removal.	400.00	1.9	760.00
Time	[Prenda v. Godfread, et al. 04/18/13] Research: deadline for filing of motion to remand.	400.00	1.1	440.00
Time	[Prenda v. Godfread, et al. 04/18/13] Research effect of alleged amended complaint on diversity jurisdiction.	400.00	1.8	720.00
Time	[Prenda v. Godfread, et al. 05/06/13] Draft and edit Response in Opposition to Motion to Remand.	400.00	2.7	1,080.00
Time	[Prenda v. Godfread, et al. 05/06/13] Confer with Laura Beasley re: affidavit of Judy Kent.	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 05/07/13] Draft and edit Response in Opposition to Motion to Remand.	400.00	3.1	1,240.00
Time	[Prenda v. Godfread, et al. 05/07/13] Review finalized, signed affidavit of Judy Kent.	400.00	0.2	80.00
Time	[Prenda v. Godfread, et al. 05/07/13] Confer with J. Sweet and P. Godfread re: Kent affidavit.	400.00	0.4	160.00
Time	[Prenda v. Godfread, et al. 05/08/13] Review affidavit of Judy Kent.	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 05/09/13] Draft and edit Response in Opposition to Motion to Remand.	400.00	1.6	640.00
Time	[Prenda v. Godfread, et al. 05/10/13] Final edit of Response in Opposition to Motion to Remand and review of exhibits.	400.00	1.5	600.00
Time	[Prenda v. Godfread, et al. 06/06/13] Review and Discuss Order from Judge Herndon denying Motion to Remand with J. Sweet and P. Godfread.	400.00	0.8	320.00
Time	[Prenda v. Godfread, et al. 06/25/13] Appear for status hearing before Judge Darrah.	400.00	1.1	440.00
Time	[Prenda v. Godfread, et al. 08/06/13] Confer with P. Godfread.	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 08/12/13] Review Plaintiff's Renewed Motion to Remand and discuss with J. Sweet and P. Godfread.	400.00	1.5	600.00
Time	[Prenda v. Godfread, et al. 08/14/13] Appear for hearing on Plaintiff's Motion to Remand for Lack of Subject Matter Jurisdiction before Judge Darrah.	400.00	1.2	480.00
Time	[Prenda v. Godfread, et al. 08/14/13] Review Plaintiff's Motion to Withdraw Renewed Motion to Remand and discuss with J. Sweet and P. Godfread.	400.00	0.5	200.00
Time	[Prenda v. Godfread, et al. 08/14/13] Telephone conference with J. Sweet and P. Godfread re: outcome of hearing before Judge Darrah.	400.00	0.9	360.00
Time	[Prenda v. Godfread, et al. 08/16/13] Draft and edit Response to Plaintiff's Renewed Motion to Remand.	400.00	2.4	960.00

Task	Time Entry Notes	Rate	Hours	Line Total
Time	[Prenda v. Godfread, et al. 08/16/13] Confer with P. Godfread.	400.00	0.2	80.00
Time	[Prenda v. Godfread, et al. 08/19/13] Review and prepare exhibits to accompany Response to Plaintiff's Renewed Motion to Remand.	400.00	0.9	360.00
Time	[Prenda v. Godfread, et al. 08/19/13] Draft and edit Response to Motion to Remand.	400.00	1.5	600.00
Time	[Prenda v. Godfread, et al. 08/20/13] Final review of exhibits and edit of Response in Opposition to Renewed Motion to Remand.	400.00	0.9	360.00
Time	[Prenda v. Godfread, et al. 08/20/13] Attend status hearing and hearing on Plaintiff's Motion to Withdraw Renewed Motion to Remand before Judge Darrah.	400.00	1.2	480.00
Time	[Prenda v. Godfread, et al. 08/20/13] Confer with J. Sweet and P. Godfread re: hearing before Judge Darrah.	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 09/10/13] Attend status hearing re: Motion for Sanctions.	400.00	1.1	440.00
Time	[Prenda v. Godfread, et al. 09/10/13] Confer with J. Sweet and P. Godfread.	400.00	0.3	120.00
Time	[Prenda v. Godfread, et al. 10/07/13] Draft and edit Reply in Support of Motion for Sanctions.	400.00	2.3	920.00
Time	[Prenda v. Godfread, et al. 10/07/13] Research General Order of Court pertaining to consent to service of process for Reply in Support of Motion for Sanctions.	400.00	0.4	160.00
Time	[Prenda v. Godfread, et al. 11/06/13] Review sanctions order issued against Prenda by Judge Noel in Minnesota.	400.00	0.4	160.00
Time	[Prenda v. Godfread, et al. 11/27/13] Review sanctions order against Prenda by Judge Murphy in the Southern District of Illinois.	400.00	0.4	160.00
Time	[Prenda v. Godfread, et al. 11/27/13] Telephone conference with J. Sweet and P. Godfread re: Noel and Murphy sanctions orders.	400.00	0.8	320.00
Time	[Prenda v. Godfread, et al. 12/10/13] Draft and submit Notice of Supplemental Authority re: Noel and Murphy sanctions orders against Prenda in support of Motion for Sanctions.	400.00	0.5	200.00
Time	[Prenda v. Godfread, et al. 01/22/14] Review Plaintiff's Motion for Leave to File Surreply to Motion for Sanctions.	400.00	0.4	160.00
Time	[Prenda v. Godfread, et al. 01/23/14] Attend hearing re: ruling on Motion for Sanctions before Judge Darrah.	400.00	1.3	520.00
Time	[Prenda v. Godfread, et al. 01/23/14] Telephone conference with J. Sweet and P. Godfread re: ruling on Motion for Sanctions.	400.00	0.7	280.00

Task	Time Entry Notes	Rate	Hours	Line Total
Time	[Prenda v. Godfread, et al. 02/03/14] Review Court's Memorandum Opinion and Order granting Motion for Sanctions.	400.00	0.4	160.00
Time	[Prenda v. Godfread, et al. 02/03/14] Telephone conference with J. Sweet and P. Godfread re: Court's Memorandum Opinion.	400.00	0.5	200.00
Time	[Prenda v. Godfread, et al. 02/05/14] Research case law re: itemization of damages for sanctions award.	400.00	2.1	840.00
Time	[Prenda v. Godfread, et al. 02/06/14] Draft Affidavit of Erin K. Russell in support of Defendants' Itemization of Attorney's Fees.	400.00	0.8	320.00
Time	[Prenda v. Godfread, et al. 02/06/14] Prepare itemized invoice to support Itemization of Attorney's Fees re: sanctions order.	400.00	2.7	1,080.00

Item	Description	Unit Cost	Quantity	Line Total
Expense	[Prenda v. Godfread, et al. 08/20/13] Court Reporter, Mary M. Hacker: transcript of proceedings before Judge Darrah on June 25, 2013	24.20	1	24.20
Expense	[Prenda v. Godfread, et al. 08/14/13] Court Reporter, Mary M. Hacker: transcript of proceedings before Judge Darrah on August 14, 2013	58.00	1	58.00
Expense	[Prenda v. Godfread, et al. 05/31/13] Legal Fees, Laura Beasley: Local counsel fees incurred investigating circumstances of the filing of the St. Clair County amended complaint and obtaining the affidavit of Circuit Court Clerk's Office employee Judy Kent.	738.00	1	738.00
Expense	[Prenda v. Godfread, et al. 04/30/13] Legal Fees, Laura Beasley: Local counsel fees incurred investigating alleged St. Clair County amended complaint.	234.00	1	234.00

Total	22,454.20
Amount Paid	-0.00
Amount Due	\$22,454.20 USD