

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Case No.: 4:07-cv-40098 FDS

Three Angels Broadcasting Network,
Inc., an Illinois non-profit
corporation, and

Danny Lee Shelton, individually,

Plaintiffs,

v.

Gailon Arthur Joy and

Robert Pickle,

Defendants.

AFFIDAVIT OF LAIRD J. HEAL

I, Laird J. Heal, hereby depose and state as follows.

1. I am an attorney duly licensed to practice in the state and federal courts of this Commonwealth and I participated as counsel of record for the Defendants Gailon Arthur Joy and Robert Pickle.

2. Following graduation from Suffolk University School of Law in 1988, I was admitted to the practice of law in 1988 in New Hampshire, 1989 in Massachusetts and 1990 in Illinois.

3. I already had, however, a career as a software engineer which I continued with.

4. After many years as an inactive member of the bar, with rare court appearances and occasional other uses of the legal education, most particularly involving intellectual property and

software copyright and patentability, I have been actively practicing law since 2004.

5. I am familiar with the rates charged by private attorneys in the area and field of practice, most often by seeing fee applications and observing hearings on the same. The billing rate for attorneys in the Commonwealth and my practice areas is most commonly quoted at \$250 per hour. My currently quoted rates range from \$175 to \$200 per hour, with consideration given to clients who have a genuine inability to pay; this is indicative more of the clients I choose to represent than the value of my services.

6. An award of fees is not based on the contracted value agreed by the opposing party and counsel, but rather on the reasonable value of the services provided.

7. The billing submitted to the Defendant Robert Pickle represents a reasonable or even modest charge for the required work involved in the defense of complaint of defamation and infringement upon intellectual property.

8. Defendant Pickle chose to enter his appearance pro se but in the transition period this office continued to provide considerable service, first to forward all court orders until he had full ECF access, second to review the documents Mr. Pickle was preparing and third to provide access to the Court when needed. It is to Mr. Pickle's credit that he very quickly showed that he could rely on his own devices – although he has continued to ask when new situations have arisen.

9. The initial billing was prepared after being requested by Defendant Pickle after the case was dismissed. The amount of this invoice was \$53,600.25. The additional assistance rendered Defendant Pickle is detailed in the invoice covering the period from October 1, 2007 to January 1, 2008, with a few telephone calls shown in a later period. This amounted to an

additional \$9,524.00.

10. The invoices were prepared by taking time records and charges and adding the unbilled items in Quickbooks Professional. Each item has a source from a contemporaneous record; the preparation was complicated in that there is more than one source file and the software does not support combining sets of transactions other than by reentering them. The second invoice was prepared using these other records, for instance. While there is a standard charge for each document such as an electronic mail message which is, as a rule of thumb, the amount of time taken to review the document and electronically file it for later easy access as required (experience has shown this indexing step is essential), this time charge is adjusted where time records show that more or less time was taken.

11. The time spent by this office on behalf of Defendant Pickle in connection with the defense of the complaint and the fees billed are reflected in the invoices attached as Exhibit A. The rates charged and fees incurred are reasonable given the time and labor required, fees customarily charged in this area for similar legal services, the amount of work required and the results obtained and my experience, reputation and ability as a lawyer.

RESPECTFULLY SUBMITTED BY:

**Laird J. Heal Esq.
COUNSEL FOR DEFENDANT
ROBERT PICKLE**

By: /s/ Laird J. Heal
Laird Heal, Esq.
78 Worcester Road
P.O. Box 365
Sterling, MA 01564
978-422-0135

Date: December 8, 2008

Invoice

Laird J. Heal, Esq.
 78 Worcester Road
 P. O. Box 365
 Sterling, MA 01564

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| Date | Invoice # |
| 11/10/2008 | 7120355 |

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| Bill To |
| Bob Pickle |

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| Description | Qty | Date | Amount |
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| 5:00 Speak to Bob Pickle and confirm service upon him and joint representation | 0.5 | 4/30/2007 | 100.00 |
| 6:00 Investigate save3ABN website | 2 | 5/2/2007 | 400.00 |
| Spoke to client regarding the basic facts of the case | 0.75 | 5/3/2007 | 150.00 |
| 6:00 Draft Opposition to Motion to Impound | 2 | 5/3/2007 | 400.00 |
| Receive email from client regarding Remnant Publications | 0.25 | 5/6/2007 | 50.00 |
| Receive email from client regarding 3ABN | 0.25 | 5/7/2007 | 50.00 |
| Receive 6 email messages from client regarding Danny Shelton and 3ABN, review | 1.91667 | 5/7/2007 | 383.33 |
| Receive 3 email messages from client, review | 1.5 | 5/8/2007 | 300.00 |
| Client email message regarding client's book | 0.08333 | 5/8/2007 | 16.67 |
| Client email on PTO and IP | 0.5 | 5/8/2007 | 100.00 |
| Draft letter to client with enclosed documents | 0.66667 | 5/11/2007 | 133.33 |
| email conversation with client regarding response to Complaint | 1.25 | 5/13/2007 | 250.00 |
| Client email with exhibit | 0.25 | 5/14/2007 | 50.00 |
| Client email regarding answer | 0.5 | 5/14/2007 | 100.00 |
| Draft Motion for A More Definite Statement | 2 | 5/14/2007 | 400.00 |
| Draft Answer | 2 | 5/15/2007 | 400.00 |
| Client email regarding meta tags and chronology | 1.05 | 5/17/2007 | 210.00 |
| Client email regarding Response to Complaint | 0.5 | 5/18/2007 | 100.00 |
| Make new draft of Answer including suggestions and corrections | 1 | 5/18/2007 | 200.00 |
| Client emails regarding answer and corrections | 0.5 | 5/20/2007 | 100.00 |
| Client email with corrections to Answer | 0.25 | 5/20/2007 | 50.00 |
| Add corrections to Answer for Bob Pickle | 1.5 | 5/20/2007 | 300.00 |
| Exhibit from client showing 3ABN-Atlantic Union connecton | 0.25 | 5/20/2007 | 50.00 |
| Finish Answer and File | 2 | 5/21/2007 | 400.00 |
| Client message about need to keep site noncommercial | 0.25 | 5/23/2007 | 50.00 |
| Client email message about links from save3ABN.com | 0.16667 | 5/23/2007 | 33.33 |
| Client email message about links | 0.25 | 5/24/2007 | 50.00 |
| Receive demand for Answer, send another copy and reply. | 1 | 5/25/2007 | 200.00 |
| Receive Supplemental document filed with Court regarding impoundment, including affidavits, analyze, summarize for clients | 1.5 | 5/28/2007 | 300.00 |
| Client email asking about the Larry Ewing affidavit | 0.25 | 5/29/2007 | 50.00 |
| Thank you for your business. | | Total | |

Invoice

Laird J. Heal, Esq.
 78 Worcester Road
 P. O. Box 365
 Sterling, MA 01564

| Date | Invoice # |
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| Description | Qty | Date | Amount |
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| Client message finding more missing from the copy of the pleading sent this office | 0.25 | 5/29/2007 | 50.00 |
| Another indication that the enclosures (affidavits) were incomplete as served | 0.25 | 6/4/2007 | 50.00 |
| Prepare response to supplemental pleading | 2 | 6/4/2007 | 400.00 |
| Message to client to review draft response. | 0.5 | 6/6/2007 | 100.00 |
| Draft Motion to strike the supplemental pleading on the basis of its shoddy and incorrect service, ask for sanctions | 1 | 6/8/2007 | 200.00 |
| Draft Motion for Extension of Time occasioned by not getting a straight answer from Gailon Joy about what he had filed. Note irregularities in service of Supplement by Plaintiffs. | 1 | 6/8/2007 | 200.00 |
| Client inquiry about Motion for Extension of Time | 0.16667 | 6/8/2007 | 33.33 |
| Client draft corrections of response to supplemental motion | 0.25 | 6/8/2007 | 50.00 |
| Final draft of supplemental memorandum | 2 | 6/10/2007 | 400.00 |
| Send client copy of documents filed (response to 'supplement') | 0.5 | 6/11/2007 | 100.00 |
| File documents (supplemental memorandum in opposition to impoundment) | 1.5 | 6/11/2007 | 300.00 |
| Client message indicating that the web page cited as an error was still available | 0.25 | 6/12/2007 | 50.00 |
| Client message about 3ABN fined in Washington state | 0.25 | 6/12/2007 | 50.00 |
| Client notified this office about Washington Consent Order | 0.25 | 6/12/2007 | 50.00 |
| Facsimile from Jerrie Hayes about missing correspondence; copy to client, detective work regarding service (DHL) | 0.5 | 6/12/2007 | 100.00 |
| Client asking if Dr. Walt Thompson is admitting fraud | 0.33333 | 6/13/2007 | 66.67 |
| Note to client about privilege | 0.33333 | 6/13/2007 | 66.67 |
| Client note about the land transactions | 0.25 | 6/13/2007 | 50.00 |
| Note to client about missing correspondence | 0.33333 | 6/13/2007 | 66.67 |
| Client note about having to appear | 0.25 | 6/13/2007 | 50.00 |
| Note to client about having to appear | 0.25 | 6/13/2007 | 50.00 |
| Client memo about tax-exempt parsonage | 0.25 | 6/13/2007 | 50.00 |
| Client memo rehashing the need to send another copy | 0.25 | 6/13/2007 | 50.00 |
| Client memo about Fjarli | 0.25 | 6/13/2007 | 50.00 |
| Note to client explaining that the lawyer sends copies to client | 0.25 | 6/13/2007 | 50.00 |
| Client note indicating that email copies were adequate | 0.25 | 6/13/2007 | 50.00 |
| Thank you for your business. | | | Total |

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| Client analysis of Fjarli `liability' | 0.25 | 6/13/2007 | 50.00 |
| Client note about Ewing affidavit vis-a-vis impoundment | 0.25 | 6/13/2007 | 50.00 |
| Client analysis of Ewing Affidavit | 0.25 | 6/13/2007 | 50.00 |
| Client note regarding correspondence | 0.25 | 6/13/2007 | 50.00 |
| Client response to message of Arthur Joy | 0.25 | 6/13/2007 | 50.00 |
| Client memo on Fjarli 990's | 0.25 | 6/14/2007 | 50.00 |
| Facsimile message regarding telephone conference | 0.25 | 6/14/2007 | 50.00 |
| Client memo on response to Hayes | 0.25 | 6/17/2007 | 50.00 |
| Duplicates without warning | 0.5 | 6/17/2007 | 100.00 |
| Facsimile from Jerrie Hayes regarding dates for telephonic 26(f) conference | 0.33333 | 6/19/2007 | 66.67 |
| Client email with PDF of Jerrie Hayes' facsimile | 0.25 | 6/19/2007 | 50.00 |
| Note to client regarding Jerrie Hayes' gender and following his direction on 26(f) conference | 0.16667 | 6/19/2007 | 33.33 |
| Client memo on Hayes' fax and timing of 26(f) conference | 0.25 | 6/20/2007 | 50.00 |
| Duplicates including warning | 0.5 | 6/20/2007 | 100.00 |
| Client note on Amazing Facts | 0.25 | 6/20/2007 | 50.00 |
| Client forward email on Amazing Facts | 0.5 | 6/21/2007 | 100.00 |
| Client note on Amazing Facts officers | 0.16667 | 6/21/2007 | 33.33 |
| Correction on earlier Amazing Facts note | 0.16667 | 6/21/2007 | 33.33 |
| Illinois Attorney General file request | 0.25 | 6/21/2007 | 50.00 |
| Further hearing on issue of impoundment - lifted - and oil on the stormy waters in the judge's rulings | 2 | 6/21/2007 | 400.00 |
| Electronic Order received | 0.33333 | 6/21/2007 | 66.67 |
| Electronic Order received | 0.33333 | 6/21/2007 | 66.67 |
| Electronic Order to unseal case | 0.33333 | 6/21/2007 | 66.67 |
| Clerk Notes of Hearing | 0.33333 | 6/21/2007 | 66.67 |
| Notice of Scheduling Conference | 0.33333 | 6/21/2007 | 66.67 |
| Client note on technology | 0.25 | 6/22/2007 | 50.00 |
| Request for information on Australia | 0.25 | 6/22/2007 | 50.00 |
| Client note giving links to case related documents following lifting of gag order | 0.25 | 6/22/2007 | 50.00 |
| Client note asking for clarification of who is representing whom | 0.25 | 6/22/2007 | 50.00 |
| Thank you for your business. | | | Total |

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| ECF Notice of Transcript (2008.05.10) | 0.33333 | 6/25/2007 | 66.67 |
| Client note about being in the lawsuit | 0.25 | 6/27/2007 | 50.00 |
| Client response to Arthur Joy's note to get the 26(f) conference done | 0.25 | 6/27/2007 | 50.00 |
| Client note expressing great temperance with respect to 3ABN's reputation | 0.25 | 6/27/2007 | 50.00 |
| Client note saying that 3ABN & co. are aware that Bob is webmaster and author | 0.25 | 6/27/2007 | 50.00 |
| Client inquiry of whether Stan Jensen has contributed | 0.25 | 6/27/2007 | 50.00 |
| Rule 26(f) conference call | 0.75 | 7/2/2007 | 150.00 |
| Notes for client information of 26(f) conference | 0.5 | 7/3/2007 | 100.00 |
| Client feedback on 26(f) notes | 0.25 | 7/5/2007 | 50.00 |
| Set up ftp server for transfer of files for discovery preparation | 0.5 | 7/5/2007 | 100.00 |
| Help client access ftp server | 0.25 | 7/5/2007 | 50.00 |
| Drafting Rule 26(f) disclosure | 1 | 7/5/2007 | 200.00 |
| Client note regarding file type | 0.16667 | 7/6/2007 | 33.33 |
| Maritime-SDA login provided, forum inspected | 0.75 | 7/6/2007 | 150.00 |
| Christian-Forums comment | 0.16667 | 7/6/2007 | 33.33 |
| Client request for further ftp help | 0.25 | 7/6/2007 | 50.00 |
| Discussion about sources | 0.41667 | 7/6/2007 | 83.33 |
| Client note pointing to discovery source | 0.25 | 7/6/2007 | 50.00 |
| Copy of letter to see if Christian-Forums can be accessed | 0.16667 | 7/8/2007 | 33.33 |
| Client note on status of providing documents | 0.16667 | 7/8/2007 | 33.33 |
| Client forwarded Christian-Forum thread on Danny and Linda | 0.25 | 7/8/2007 | 50.00 |
| Client copy of email to Roger Wilson | 0.33333 | 7/9/2007 | 66.67 |
| Client note about IL Attorney General document request | 0.25 | 7/10/2007 | 50.00 |
| Forwarded message to 'Ina Fog' | 0.33333 | 7/10/2007 | 66.67 |
| Forwarded messages from Rick and Jeanette Brantley | 0.25 | 7/10/2007 | 50.00 |
| Client copy of email message | 0.25 | 7/10/2007 | 50.00 |
| Client list for automatic disclosure | 0.33333 | 7/10/2007 | 66.67 |
| Client message including 3ABN affiliation with Seventh-day Adventist Church | 0.25 | 7/11/2007 | 50.00 |
| Client copy of information request | 0.25 | 7/11/2007 | 50.00 |
| Client message showing Dr. Walt Thompson's son's MySpace page | 0.25 | 7/11/2007 | 50.00 |
| Client note on file uploads | 0.25 | 7/11/2007 | 50.00 |
| Thank you for your business. | Total | | |

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| Client note on email searches and Base64 encoding | 0.25 | 7/12/2007 | 50.00 |
| Client response on parishioner who possibly is paying legal bills for 3ABN | 0.25 | 7/12/2007 | 50.00 |
| Review of documents | 4 | 7/14/2007 | 800.00 |
| Review of documents | 4 | 7/15/2007 | 800.00 |
| Client call wondering about journalist privilege and discussing discovery | 0.16667 | 7/15/2007 | 33.33 |
| Client note to be inclusive with automatic discovery | 0.25 | 7/16/2007 | 50.00 |
| Client inquiry on need to provide index | 0.33333 | 7/16/2007 | 66.67 |
| Client response to relevance | 0.25 | 7/16/2007 | 50.00 |
| Reply to client noting the mass of documents being reviewed | 0.16667 | 7/16/2007 | 33.33 |
| Client concern about copyright issues | 0.25 | 7/16/2007 | 50.00 |
| Client uploading WMF file to view | 0.25 | 7/16/2007 | 50.00 |
| Client repeating that more self-discovery is better | 0.25 | 7/16/2007 | 50.00 |
| Client position on electronic discovery | 0.25 | 7/16/2007 | 50.00 |
| Client intent to include Tommy Shelton information in self-discovery | 0.25 | 7/16/2007 | 50.00 |
| Client note on uploading video | 0.25 | 7/16/2007 | 50.00 |
| Review of 3ABN Live file | 2 | 7/17/2007 | 400.00 |
| Client note on being inclusive with self-discovery | 0.25 | 7/17/2007 | 50.00 |
| Client note that video was uploaded | 0.25 | 7/17/2007 | 50.00 |
| Client note to discover everything to avoid any need for electronic discovery | 0.25 | 7/17/2007 | 50.00 |
| Question about Walter Rowley and client deferring to Arthur Joy | 0.25 | 7/17/2007 | 50.00 |
| Client message enclosing advertisement of 3ABN as Adventist | 0.25 | 7/17/2007 | 50.00 |
| Client message regarding Anti-SLAPP | 0.25 | 7/17/2007 | 50.00 |
| Email link of Anti-SLAPP for client review | 0.33333 | 7/17/2007 | 66.67 |
| Receive facsimile 26(f) draft from Jerrie Hayes | 0.25 | 7/17/2007 | 50.00 |
| Email message to Jerrie Hayes acknowledging fax of Rule 26(f) draft | 0.33333 | 7/17/2007 | 66.67 |
| Electronic-mail facsimile message | 0.25 | 7/17/2007 | 50.00 |
| Electronic-mail facsimile message (from Hayes to Joy) 25 pp including Plaintiffs' Rule 26(f) Report draft | 0.5 | 7/17/2007 | 100.00 |
| Electronic-Mail copy (from Jerrie Hayes' assistant) of Rule 26(f) Report draft | 0.25 | 7/17/2007 | 50.00 |
| Jerrie Hayes message on response after receipt of Plaintiffs' draft | 0.33333 | 7/17/2007 | 66.67 |
| Thank you for your business. | Total | | |

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| Reply to Jerrie Hayes' response | 0.5 | 7/17/2007 | 100.00 |
| Memo to client on where to conduct legal research and enclosing decision he had not been able to obtain | 0.75 | 7/17/2007 | 150.00 |
| Memo discussing how to search and review the number of discoverable documents | 0.25 | 7/17/2007 | 50.00 |
| Client note of his business dealings and how it behooves him to be 3ABN's friend not foe | 0.25 | 7/17/2007 | 50.00 |
| Note from client that further uploads are ongoing and identifying them | 0.25 | 7/17/2007 | 50.00 |
| Message from Jerrie Hayes accusing defendants of dropping the discovery ball | 0.41667 | 7/18/2007 | 83.33 |
| Response to Jerrie Hayes suggesting that constructive issues be addressed | 0.5 | 7/18/2007 | 100.00 |
| Message from Jerrie Hayes suggesting separate reports | 0.25 | 7/18/2007 | 50.00 |
| Memo to client regarding the neverending Hayes discourse | 0.25 | 7/18/2007 | 50.00 |
| Memo to Arthur Joy about coordinating Rule 26(f) report | 0.25 | 7/18/2007 | 50.00 |
| Client note on further uploading progress | 0.25 | 7/18/2007 | 50.00 |
| Receive Arthur Joy's summary of defendant's claims, review | 0.5 | 7/19/2007 | 100.00 |
| Draft Rule 26(f) report | 3 | 7/19/2007 | 600.00 |
| Client note on his review of Defendants' 26(f) report enclosing drafts | 1 | 7/19/2007 | 200.00 |
| Client note regarding 26(f) draft | 0.25 | 7/19/2007 | 50.00 |
| Review and redrafting 26(f) report | 1 | 7/19/2007 | 200.00 |
| Memo to Arthur Joy on Anti-SLAPP | 0.58333 | 7/19/2007 | 116.67 |
| Client proofreading of draft report | 0.25 | 7/19/2007 | 50.00 |
| Client note to Arthur Joy about John Lomacang | 0.25 | 7/19/2007 | 50.00 |
| Draft to client for review | 1 | 7/19/2007 | 200.00 |
| Copy of draft to Arthur Joy for review | 0.01667 | 7/19/2007 | 3.33 |
| Defendant's Joint Report sent to Hayes | 0.25 | 7/19/2007 | 50.00 |
| Email from Jerrie Hayes rejecting Defendants' choices of language. | 0.25 | 7/19/2007 | 50.00 |
| Note to Jerrie Hayes that separate reports should be submitted as the time to exchange drafts had run out. | 0.25 | 7/19/2007 | 50.00 |
| Email from Jerrie Hayes indicating that separate reports would be submitted | 0.25 | 7/20/2007 | 50.00 |
| Email from client about ASI membership | 0.25 | 7/20/2007 | 50.00 |
| Email from client about ASI-3ABN 'suggestion' | 0.25 | 7/20/2007 | 50.00 |
| Thank you for your business. | | | Total |

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| Email from J. Lizette Richards enclosing 26(f) report | 0.25 | 7/20/2007 | 50.00 |
| Client response to Plaintiffs' 26(f) report | 0.25 | 7/20/2007 | 50.00 |
| Client copies of ECF filings (26(f) reports) | 0.25 | 7/20/2007 | 50.00 |
| Email to J. Lizette Richards confirming transmission of 26(f) reports | 0.25 | 7/20/2007 | 50.00 |
| Email to client containing 26(f) report and comments | 0.33333 | 7/20/2007 | 66.67 |
| Client possible clarification to Defendants' report | 0.16667 | 7/20/2007 | 33.33 |
| Client note that protective order was not mentioned by Plaintiffs | 0.16667 | 7/20/2007 | 33.33 |
| File Rule 26(f) report, serve per rule | 0.75 | 7/20/2007 | 150.00 |
| Received Plaintiffs' 26(f) report | 0.33333 | 7/20/2007 | 66.67 |
| Received Defendants' 26(f) report as filed | 0.33333 | 7/20/2007 | 66.67 |
| Prepare Rule 16.1(d) submission | 4 | 7/21/2007 | 800.00 |
| Reply regarding Rule 16.1(d) submission | 0.25 | 7/21/2007 | 50.00 |
| Client email about additional documents | 0.16667 | 7/21/2007 | 33.33 |
| Client email about additional documents | 0.16667 | 7/22/2007 | 33.33 |
| Review additional documents | 0.5 | 7/22/2007 | 100.00 |
| Client email attaching email note of Walt Thompson | 0.25 | 7/23/2007 | 50.00 |
| Status Conference Hearing | 1 | 7/23/2007 | 200.00 |
| Receive notes of hearing, copy client and Arthur Joy | 0.33333 | 7/23/2007 | 66.67 |
| Receive Order of Reference | 0.33333 | 7/23/2007 | 66.67 |
| Receive client response to Arthur Joy's email about beginning of discovery | 0.33333 | 7/24/2007 | 66.67 |
| Reply requesting information on the site hosting the web server | 0.33333 | 7/24/2007 | 66.67 |
| Receive copy of facsimile to Arthur Joy from the district court | 0.16667 | 7/24/2007 | 33.33 |
| Client email with host information for save3ABN.com | 0.33333 | 7/24/2007 | 66.67 |
| Email to client acknowledging receipt of host contact information | 0.33333 | 7/24/2007 | 66.67 |
| Further auto discovery review | 2 | 7/24/2007 | 400.00 |
| Further auto discovery review | 2 | 7/25/2007 | 400.00 |
| Email from Jerrie Hayes proposing teleconference for 8/1/07 at 2:30 PM EDT | 0.33333 | 7/26/2007 | 66.67 |
| Further auto discovery review | 2 | 7/26/2007 | 400.00 |
| Email to client copying Jerrie Hayes' | 0.33333 | 7/26/2007 | 66.67 |
| Email from client indicating that hard drive would not be provided | 0.33333 | 7/26/2007 | 66.67 |
| Response to client mentioning encryption | 0.33333 | 7/27/2007 | 66.67 |
| Response to updated email discussing Intellectual Property | 0.33333 | 7/27/2007 | 66.67 |
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| Email from client to here and Arthur Joy describing Intellectual Property rights | 0.5 | 7/27/2007 | 100.00 |
| Email from client clarifying the trade secrets | 0.16667 | 7/27/2007 | 33.33 |
| Email from client bringing upload period to January 2007 | 0.16667 | 7/27/2007 | 33.33 |
| Review of Documents | 8 | 7/28/2007 | 1,600.00 |
| Review of Documents | 8 | 7/29/2007 | 1,600.00 |
| Facsimile from Jerrie Hayes received to fax server and by email, copy to client | 0.33333 | 7/30/2007 | 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 | 7/30/2007 | 66.67 |
| Response to Jerrie Hayes noting that no agenda for conference call has been mentioned | 0.33333 | 7/30/2007 | 66.67 |
| Email from Jerrie Hayes skirting the agenda issue | 0.33333 | 7/30/2007 | 66.67 |
| Client note giving contacts who might intervene if their data were scheduled to be examined. | 0.33333 | 7/30/2007 | 66.67 |
| Client email directing attention to Illinois Attorney General charities income list, showing 3ABN had an increase | 0.16667 | 7/30/2007 | 33.33 |
| Client email giving html chart of 3ABN assets and income | 0.25 | 7/30/2007 | 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 | 7/30/2007 | 83.33 |
| Client email response to memo to Jerrie Hayes concluding that she has as yet proposed nothing. | 0.25 | 7/30/2007 | 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 | 7/30/2007 | 66.67 |
| Review of Documents | 2 | 7/30/2007 | 400.00 |
| Client email response to computer expert proposal but actually giving statistics on the number of sensitive transactions his server has recorded. | 0.33333 | 7/31/2007 | 66.67 |
| Email to client summarizing the latest issues, including his worries about his data. | 0.33333 | 7/31/2007 | 66.67 |
| Email to client and Arthur Joy informing them of an anticipatory counterclaim in a similar suit | 0.33333 | 7/31/2007 | 66.67 |
| Thank you for your business. | Total | | |

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| Email to Jerrie Hays asking for clarification, if clarification is an answer in the first place | 0.33333 | 7/31/2007 | 66.67 |
| Email from Jerrie Hayes listing the types of electronic data sought by plaintiffs to be obtained through discovery | 0.33333 | 7/31/2007 | 66.67 |
| Email to Arthur Joy asking for less, not more, in communications to Jerrie Hayes | 0.33333 | 7/31/2007 | 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 | 7/31/2007 | 66.67 |
| Email to Arthur Joy asking what progress he had made with the subpoenas | 0.33333 | 7/31/2007 | 66.67 |
| Email from Jerrie Hayes reiterating the scope of the electronic discovery request | 0.5 | 7/31/2007 | 100.00 |
| Email from Jerrie Hayes to Arthur Joy indicating that recording the conference would probably not be possible | 0.25 | 7/31/2007 | 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 | 7/31/2007 | 50.00 |
| Review of Documents | 2 | 7/31/2007 | 400.00 |
| Email to Loren Heal about consulting as an expert. | 0.25 | 8/1/2007 | 50.00 |
| Facsimile received through email, anonymously accusing Pucci of representing a liar and a thief, with exhibits. | 0.5 | 8/1/2007 | 100.00 |
| Email facsimile "Joint Declaration of Commitment by SDA and 3ABN | 0.33333 | 8/1/2007 | 66.67 |
| Email facsimile "To Air is Divine" by Marc Fisher | 0.33333 | 8/1/2007 | 66.67 |
| Email to/from Loren Heal regarding consulting possibility | 0.33333 | 8/1/2007 | 66.67 |
| Determine law of electronic discovery | 1.33333 | 8/1/2007 | 266.67 |
| Email to client giving place where Sedona Principles can be downloaded (PDF) | 0.33333 | 8/1/2007 | 66.67 |
| Review of Documents | 2 | 8/1/2007 | 400.00 |
| Email messages from Arthur Joy containing 12 "addendi" to subpoenas - review and edit | 1 | 8/2/2007 | 200.00 |
| Email message to client and Arthur Joy regarding the content (addendi) of the subpoena requests | 0.33333 | 8/2/2007 | 66.67 |
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| Email message to Arthur Joy regarding subpoena procedure | 0.33333 | 8/2/2007 | 66.67 |
| Email response by Arthur Joy indicating he would serve subpoenas in a particular manner. | 0.33333 | 8/2/2007 | 66.67 |
| Email from Arthur Joy mollifying his earlier appearance of dogmatism. | 0.33333 | 8/2/2007 | 66.67 |
| Email to Arthur Joy clarifying concerns, namely the inevitable motions to quash subpoenas | 0.33333 | 8/2/2007 | 66.67 |
| Email from Arthur Joy indicating he was going to serve by DHL | 0.33333 | 8/2/2007 | 66.67 |
| Email from client relaying announcement that Amazing Facts was pulling out of 3ABN merger | 0.16667 | 8/2/2007 | 33.33 |
| Email from Arthur Joy responding to the merger cancellation | 0.16667 | 8/2/2007 | 33.33 |
| Review of Documents | 2 | 8/2/2007 | 400.00 |
| Email responding to merger cancellation | 0.25 | 8/3/2007 | 50.00 |
| Email to client about the Electronic Self-Discovery DVDs being prepared | 0.33333 | 8/3/2007 | 66.67 |
| Review of Documents | 2 | 8/3/2007 | 400.00 |
| Copy of Joy's Answer (in MS Word .doc format) | 0.33333 | 8/3/2007 | 66.67 |
| Create DVD for electronic discovery | 1 | 8/3/2007 | 200.00 |
| Email asking if there were other matters not covered by Arthur Joy to issue subpoenas on, also giving DVD directory list. | 0.25 | 8/3/2007 | 50.00 |
| Receive Notices of Deposition (misdated) and copy client | 0.41667 | 8/3/2007 | 83.33 |
| Receive facsimile of Plaintiff Disclosures, review and copy client | 1 | 8/3/2007 | 200.00 |
| Email facsimile of Plaintiffs' Initial Disclosures | 0.16667 | 8/3/2007 | 33.33 |
| Email facsimile of Notices of Deposition of Defendants | 0.16667 | 8/3/2007 | 33.33 |
| Email from client echoing my thoughts on appearing in the prior year | 0.16667 | 8/3/2007 | 33.33 |
| Email from client responding to the disclosures | 0.33333 | 8/3/2007 | 66.67 |
| Email from client about acquaintance of Walt Thompson | 0.25 | 8/3/2007 | 50.00 |
| Email about party issuing notices of deposition | 0.25 | 8/3/2007 | 50.00 |
| Email responding to questions about disclosures | 0.41667 | 8/3/2007 | 83.33 |
| Email to Arthur Joy and Client about deficiencies in Plaintiff disclosures | 0.41667 | 8/4/2007 | 83.33 |
| Research to detail failings of Plaintiff disclosures | 1.5 | 8/4/2007 | 300.00 |
| Email to client about need to make copies at our cost given plaintiff obstinance | 0.5 | 8/4/2007 | 100.00 |
| Further document review for disclosure | 4 | 8/4/2007 | 800.00 |
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| Further document review for disclosure | 4 | 8/5/2007 | 800.00 |
| Email to Arthur Joy noting that merely billing 40 hours per week since beginning of case would bring the bill to over \$100,000 already, and also coordinating subpoena notices. | 0.25 | 8/5/2007 | 50.00 |
| Research on Anti-SLAPP, choice of laws and procedure | 2 | 8/5/2007 | 400.00 |
| Research on Anti-SLAPP, choice of laws and procedure | 2 | 8/6/2007 | 400.00 |
| Email to client regarding anti-SLAPP | 0.33333 | 8/6/2007 | 66.67 |
| Draft demand letter for Pucci sent to Arthur Joy and client | 1.16667 | 8/6/2007 | 233.33 |
| Client response to draft demand letter | 0.33333 | 8/6/2007 | 66.67 |
| Email to client agreeing with comments on draft | 0.33333 | 8/6/2007 | 66.67 |
| Continued research on Anti-SLAPP | 1 | 8/6/2007 | 200.00 |
| Email to client showing Minnesota Anti-SLAPP case | 0.33333 | 8/6/2007 | 66.67 |
| Email to client enclosing case and repeating mention of the need for a First-Amendment affidavit. | 0.08333 | 8/6/2007 | 16.67 |
| Statement from client that he was not intending to provoke governmental action... | 0.33333 | 8/6/2007 | 66.67 |
| Receive letter from Jerrie Hayes to court indicating that an evidentiary hearing was needed to help the Court resolve the issue | 0.25 | 8/6/2007 | 50.00 |
| Email from client analyzing his actions vis-a-vis Anti-SLAPP | 0.33333 | 8/7/2007 | 66.67 |
| Email from client indicating that I need to ask the clerk to allow video conference for hearing on August 9 | 0.33333 | 8/7/2007 | 66.67 |
| Call to clerk asking for video conference to be set up from Fargo ND courthouse. | 0.16667 | 8/7/2007 | 33.33 |
| Facsimile from Jerrie Hayes going to great length to explain why their disclosure did not go to enough length. | 0.33333 | 8/7/2007 | 66.67 |
| Email from client suggesting he be the computer expert | 0.16667 | 8/7/2007 | 33.33 |
| Email to client indicating that the court would test a linkage to Fargo courthouse | 0.25 | 8/7/2007 | 50.00 |
| Email from client offering single correction to draft response to Jerrie Hayes | 0.16667 | 8/8/2007 | 33.33 |
| Email to client responding to thought that he should be the computer expert | 0.33333 | 8/8/2007 | 66.67 |
| Letter to Jerrie Hayes and copy to client apologizing for the indignant tone | 0.33333 | 8/8/2007 | 66.67 |
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| Email to Client and Arthur Joy about pending journalist shield litigation | 0.08333 | 8/9/2007 | 16.67 |
| Email from Arthur Joy regarding evidentiary hearing for afternoon | 0.33333 | 8/9/2007 | 66.67 |
| Prepare exhibits including Sedona Conventions as amended | 2.5 | 8/9/2007 | 500.00 |
| Evidentiary Hearing | 1.5 | 8/9/2007 | 300.00 |
| Email to client about hearing and Paul Levy's call | 0.33333 | 8/9/2007 | 66.67 |
| Client email of internet chat log regarding case | 0.33333 | 8/9/2007 | 66.67 |
| Email to client enclosing case and repeating mention of the need for a First-Amendment affidavit. | 0.16667 | 8/10/2007 | 33.33 |
| Client email indicating that Plaintiffs are trying to subvert Sedona Principles | 0.33333 | 8/10/2007 | 66.67 |
| Response to Client indicating that any quibbling about electronic discovery should not start to compromise the scope of the discovery, which is to not allow it. | 0.33333 | 8/10/2007 | 66.67 |
| Client response to ask that Sedona principles be incorporated into a proposed order | 0.33333 | 8/10/2007 | 66.67 |
| Email to Arthur Joy about Paul Levy and an appearance to handle the IP issues | 0.33333 | 8/11/2007 | 66.67 |
| Receive by mail Jerries Hayes disclaimer about her disclosures | 0.5 | 8/11/2007 | 100.00 |
| Email from Arthur Joy describing Levy's limitation | 0.33333 | 8/13/2007 | 66.67 |
| Copy client on court email messages | 0.33333 | 8/13/2007 | 66.67 |
| Receive Plaintiffs' 16.1 notification from Court | 0.25 | 8/13/2007 | 50.00 |
| Receive Electronic Order to submit Proposed Order with 14 Days | 0.25 | 8/13/2007 | 50.00 |
| Research regarding Proposed Order submission | 1 | 8/14/2007 | 200.00 |
| Research regarding Proposed Order submission | 1 | 8/15/2007 | 200.00 |
| Research regarding Proposed Order submission | 1 | 8/16/2007 | 200.00 |
| Note to client that Darrel Mundall has contributed \$500 | 0.33333 | 8/17/2007 | 66.67 |
| Research regarding Proposed Order submission | 1 | 8/17/2007 | 200.00 |
| Receive by mail Jerries Hayes disclaimer about her disclosures | 0.5 | 8/18/2007 | 100.00 |
| | 0.25 | 8/20/2007 | 50.00 |
| Receive Plaintiffs' 16.1 notification from Court | 0.25 | 8/20/2007 | 50.00 |
| Research regarding Proposed Order submission | 1 | 8/21/2007 | 200.00 |
| Research regarding Proposed Order submission | 1 | 8/22/2007 | 200.00 |
| Receive Proposed Order from Plaintiffs | 0.33333 | 8/23/2007 | 66.67 |
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| Receive Interrogatories and Requests for Production of Documents | 0.25 | 8/23/2007 | 50.00 |
| Research regarding Proposed Order submission | 1 | 8/23/2007 | 200.00 |
| Copy of Proposed Order from Plaintiffs to client and Arthur Joy | 0.33333 | 8/24/2007 | 66.67 |
| Copy client with Interrogatories and Requests for Production | 0.41667 | 8/24/2007 | 83.33 |
| Research regarding Proposed Order submission | 1 | 8/24/2007 | 200.00 |
| Send Client Text of Plaintiff's Proposal | 0.25 | 8/27/2007 | 50.00 |
| Draft Proposed Order and circulate | 1.66667 | 8/27/2007 | 333.33 |
| Further draft of Proposed Order including clawback provisions | 0.91667 | 8/27/2007 | 183.33 |
| Response from Arthur Joy on the Plaintiff's Proposal message | 0.16667 | 8/27/2007 | 33.33 |
| File the Proposed Order for client | 0.33333 | 8/27/2007 | 66.67 |
| Facsimile about the Ellen G. White estate | 0.25 | 8/28/2007 | 50.00 |
| Client email including OCR of the document request | 0.33333 | 8/28/2007 | 66.67 |
| Arthur Joy email noting that Jim Gilley was the new President of 3ABN | 0.33333 | 8/31/2007 | 66.67 |
| Email facsimile including a tract, review, file | 0.33333 | 9/4/2007 | 66.67 |
| Client request for an amended notice of deposition if any is to be issued | 0.33333 | 9/4/2007 | 66.67 |
| Email facsimile including a tract, review, file | 0.33333 | 9/6/2007 | 66.67 |
| Email from Gailon Joy indicating that 3ABN was declaring war on the internet bloggers, not including themselves, apparently | 0.33333 | 9/7/2007 | 66.67 |
| Email facsimile including a pastoral aphorism | 0.33333 | 9/7/2007 | 66.67 |
| Email facsimile of pages 13-17 of 3ABN brief | 0.33333 | 9/9/2007 | 66.67 |
| Email facsimile of pages 18-22 of 3ABN brief | 0.33333 | 9/9/2007 | 66.67 |
| Email facsimile of pages 23-27 of 3ABN brief | 0.33333 | 9/9/2007 | 66.67 |
| Email facsimile of pages 23-27 of 3ABN brief | 0.33333 | 9/9/2007 | 66.67 |
| Email facsimile of pages 28-32 of 3ABN brief | 0.33333 | 9/9/2007 | 66.67 |
| Email facsimile of first five pages of 3ABN brief to obtain tax exempt status | 0.33333 | 9/9/2007 | 66.67 |
| Email facsimile of next five pages (3-7) of 3ABN brief | 0.33333 | 9/9/2007 | 66.67 |
| Email facsimile of pages 8-12 of 3ABN brief | 0.33333 | 9/9/2007 | 66.67 |
| Telephone call to client indicating that not all pages of 3ABN brief had gone through and with the response that it would be sent later | 0.1 | 9/9/2007 | 20.00 |
| Email facsimile of pages 33-42 of 3ABN brief | 0.33333 | 9/10/2007 | 66.67 |
| Email facsimile of pages 48-49 of 3ABN brief | 0.33333 | 9/10/2007 | 66.67 |
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| Email facsimile of pages 43-47 of 3ABN brief | 0.33333 | 9/10/2007 | 66.67 |
| Email to client counseling against putting draft interrogatory answers online | 0.33333 | 9/10/2007 | 66.67 |
| Review Draft Interrogatory Answers | 1.5 | 9/10/2007 | 300.00 |
| Email from client sharing thoughts on grep and dd as preferred forensic tools | 0.33333 | 9/11/2007 | 66.67 |
| Client email requesting continuance of deposition | 0.33333 | 9/11/2007 | 66.67 |
| Response to Client and Arthur Joy regarding forensic techniques and veracity | 0.33333 | 9/11/2007 | 66.67 |
| Response to client request to continue deposition asking for clarification | 0.33333 | 9/11/2007 | 66.67 |
| Client further wondering just how much of an expert their forensic data expert is | 0.33333 | 9/11/2007 | 66.67 |
| Client response giving dates for deposition | 0.33333 | 9/11/2007 | 66.67 |
| Receive amended notice of deposition for Robert Pickle, copy client | 0.33333 | 9/11/2007 | 66.67 |
| Client response to copy of amended notice | 0.16667 | 9/11/2007 | 33.33 |
| Answer for client about amended notice | 0.16667 | 9/11/2007 | 33.33 |
| Email Facsimile newsletter "The 3ABN Lawsuit" | 0.33333 | 9/11/2007 | 66.67 |
| Client copy of letter postponing the Joy deposition | 0.33333 | 9/18/2007 | 66.67 |
| Client email containing final draft (signed) of discovery answers, review | 1 | 9/18/2007 | 200.00 |
| Email notes regarding the discovery answers | 0.33333 | 9/18/2007 | 66.67 |
| Continued research on Anti-SLAPP | 1 | 9/18/2007 | 200.00 |
| Continued research on Anti-SLAPP | 1 | 9/19/2007 | 200.00 |
| Further critique, answer by answer, of discovery response | 1 | 9/20/2007 | 200.00 |
| Continued research on Anti-SLAPP | 1 | 9/20/2007 | 200.00 |
| Call to client to discuss discovery related issues | 0.25 | 9/21/2007 | 50.00 |
| Client indicating that the answers were final and changes would not markedly improve them | 0.33333 | 9/21/2007 | 66.67 |
| Continued research on Anti-SLAPP | 1 | 9/21/2007 | 200.00 |
| Response to Client discovery and anti-SLAPP directives | 0.33333 | 9/21/2007 | 66.67 |
| Receive Client's discovery documents, review | 6 | 9/22/2007 | 1,200.00 |
| Receive Client's discovery documents, review | 4 | 9/23/2007 | 800.00 |
| Email facsimile of printed email from "Rosa & Jim Ware", 9 pp. | 0.33333 | 9/24/2007 | 66.67 |
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| Receive Client's discovery documents, review | 4 | 9/24/2007 | 800.00 |
| Receive Client's discovery documents, review | 4 | 9/25/2007 | 800.00 |
| Receive Client's discovery documents, review | 4 | 9/26/2007 | 800.00 |
| Receive Client's discovery documents, review | 4 | 9/27/2007 | 800.00 |
| Receive Client's discovery documents, review | 4 | 9/28/2007 | 800.00 |
| Review Discovery Materials | 4 | 9/29/2007 | 800.00 |
| Review Discovery Materials | 4 | 9/30/2007 | 800.00 |
| Review Discovery Materials | 4 | 10/1/2007 | 800.00 |
| Speak with Arthur Joy regarding discovery status (his & client's) | 0.25 | 10/2/2007 | 50.00 |
| Review Discovery Materials | 4 | 10/2/2007 | 800.00 |
| Send discovery materials | 1 | 10/3/2007 | 200.00 |
| Review Discovery Materials | 2 | 10/3/2007 | 400.00 |
| Confirm discovery sent to client | 0.33333 | 10/4/2007 | 66.67 |
| Thank you for your business. | | | Total \$53,600.25 |

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| Client email re: defamation | 0.33333 | 10/11/2007 | 66.67 |
| Facsimile from client | 0.33333 | 10/16/2007 | 66.67 |
| Facsimile from Client | 0.33333 | 10/16/2007 | 66.67 |
| Electronic Facsimile from client | 0.33333 | 10/16/2007 | 66.67 |
| Email from client re: Remnant Publications 990s | 0.33333 | 10/17/2007 | 66.67 |
| Email from client requesting review of Remnant webpage | 0.33333 | 10/21/2007 | 66.67 |
| Review of Remnant Webpage | 0.25 | 10/21/2007 | 50.00 |
| Email to client following conversation with Gailon Joy | 0.33333 | 10/25/2007 | 66.67 |
| Email from client about discovery | 0.33333 | 10/25/2007 | 66.67 |
| Response to client about Gailon Joy conversation | 0.33333 | 10/25/2007 | 66.67 |
| Facsmile from client | 0.33333 | 10/26/2007 | 66.67 |
| Email copy of docket entry | 0.33333 | 10/28/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 10/29/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 10/29/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 10/29/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 10/31/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 10/31/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/1/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/5/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/5/2007 | 66.67 |
| Email from client | 0.33333 | 11/5/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/6/2007 | 66.67 |
| Email from client complaining about violations of Judge Saylor's orders | 0.33333 | 11/7/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/8/2007 | 66.67 |
| Email containing Notice of Appearance | 0.33333 | 11/8/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/8/2007 | 66.67 |
| Email from client complaining about Jerrie Hayes | 0.33333 | 11/8/2007 | 66.67 |
| Email from client about email not arriving | 0.33333 | 11/8/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/9/2007 | 66.67 |
| Email confirming receipt of Notice of Appearance | 0.33333 | 11/10/2007 | 66.67 |
| Email advising client | 0.33333 | 11/10/2007 | 66.67 |
| Email about appearance | 0.33333 | 11/11/2007 | 66.67 |
| Telephone call from client | 2.15 | 11/12/2007 | 430.00 |
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| Email asking to review discovery request | 0.33333 | 11/12/2007 | 66.67 |
| Email containing draft subpoena (to Remnant Publications) | 0.33333 | 11/12/2007 | 66.67 |
| Followup Email about Remnant | 0.33333 | 11/12/2007 | 66.67 |
| Email reviewing subpoena drafting to date | 0.41667 | 11/13/2007 | 83.33 |
| Email with sample interrogatories and Notice of Deposition | 0.16667 | 11/13/2007 | 33.33 |
| Email with docket of bankruptcy case, per request | 0.41667 | 11/13/2007 | 83.33 |
| Reply email about bankruptcy docket | 0.16667 | 11/13/2007 | 33.33 |
| Final draft of Requests for Production | 0.5 | 11/14/2007 | 100.00 |
| Response to Final Draft email | 0.08333 | 11/14/2007 | 16.67 |
| Re: Response to final draft | 0.33333 | 11/14/2007 | 66.67 |
| Re: Response to final draft | 0.33333 | 11/14/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/14/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/14/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/14/2007 | 66.67 |
| Email about Remnant contacts | 0.16667 | 11/14/2007 | 33.33 |
| Electronic facsimile message from client | 0.33333 | 11/15/2007 | 66.67 |
| Email complaining about Jerrie Hayes copying previous facsimile | 0.16667 | 11/15/2007 | 33.33 |
| Telephone call from client | 0.05 | 11/16/2007 | 10.00 |
| Telephone call from client | 0.2 | 11/16/2007 | 40.00 |
| Email about drafting | 0.33333 | 11/16/2007 | 66.67 |
| Client reply about drafting | 0.33333 | 11/16/2007 | 66.67 |
| Reply to client about drafting | 0.33333 | 11/16/2007 | 66.67 |
| Email from client forwarding an ECF notice | 0.33333 | 11/19/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/19/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/19/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/19/2007 | 66.67 |
| Response to client forwarding email | 0.08333 | 11/19/2007 | 16.67 |
| Draft affidavit for review | 0.5 | 11/19/2007 | 100.00 |
| Electronic facsimile message from client | 0.33333 | 11/20/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/20/2007 | 66.67 |
| Email with response of Attorney Jerrie Hayes | 0.33333 | 11/20/2007 | 66.67 |
| Email followup to Jerrie Hayes question | 0.33333 | 11/20/2007 | 66.67 |
| Email with draft affidavit | 0.33333 | 11/20/2007 | 66.67 |
| Email responding to draft affidavit | 0.33333 | 11/20/2007 | 66.67 |
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Invoice

Laird J. Heal, Esq.
 78 Worcester Road
 P. O. Box 365
 Sterling, MA 01564

| Date | Invoice # |
|-----------|-----------|
| 12/8/2008 | 7120336 |

| |
|---|
| Bill To |
| Bob Pickle 1354 County Highway 21 Halstad, MN 56548 |

| Description | Qty | Date | Amount |
|---|---------|--------------|--------|
| Email detailing the Automatic Stay and grounds for relief | 0.33333 | 11/20/2007 | 66.67 |
| Email saying the affidavit had not been received | 0.08333 | 11/20/2007 | 16.67 |
| Email indicating that aresponse had been filed despite its mootness | 0.16667 | 11/20/2007 | 33.33 |
| Draft Remnant Subpoena | 0.33333 | 11/20/2007 | 66.67 |
| Draft letter to Jerrie Hayes | 0.41667 | 11/20/2007 | 83.33 |
| Revised Draft to Jerrie Hayes | 0.33333 | 11/20/2007 | 66.67 |
| Response of Jerrie Hayes | 0.33333 | 11/21/2007 | 66.67 |
| 3ABN Board Meeting info | 0.33333 | 11/21/2007 | 66.67 |
| Response re - remnant subpoena details | 0.33333 | 11/21/2007 | 66.67 |
| Requests to obtain clerk/judge signature on subpoena | 0.33333 | 11/21/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/23/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/23/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/27/2007 | 66.67 |
| Email to paralegal for transport to court and signature | 0.08333 | 11/27/2007 | 16.67 |
| Return call to Client | 0.5 | 11/28/2007 | 100.00 |
| Return call to Client | 0.3 | 11/28/2007 | 60.00 |
| Return call to Client | 0.65 | 11/28/2007 | 130.00 |
| Telephone call from Client | 0.15 | 11/28/2007 | 30.00 |
| Telephone call from Client | 0.5 | 11/28/2007 | 100.00 |
| Electronic facsimile message from client | 0.33333 | 11/28/2007 | 66.67 |
| Telephone call from Client | 0.1 | 11/29/2007 | 20.00 |
| Telephone call from Client | 0.1 | 11/29/2007 | 20.00 |
| Telephone call from Client | 0.2 | 11/29/2007 | 40.00 |
| Email about Requests for Production | 0.33333 | 11/29/2007 | 66.67 |
| Telephone call from Client | 0.15 | 11/30/2007 | 30.00 |
| Email about Motions to Compel | 0.33333 | 11/30/2007 | 66.67 |
| Email about 3ABN board | 0.33333 | 11/30/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/30/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/30/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/30/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 11/30/2007 | 66.67 |
| Email answering message about board and disclosures | 0.33333 | 12/1/2007 | 66.67 |
| Email answering message about motions to compel | 0.05 | 12/1/2007 | 10.00 |
| Email answering message about requests to produce | 0.75 | 12/1/2007 | 150.00 |
| | | Total | |

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|--|---------|------------|--------|
| Email detailing issues | 0.33333 | 12/2/2007 | 66.67 |
| Followup email on issues | 0.33333 | 12/2/2007 | 66.67 |
| Telephone call from client | 0.25 | 12/3/2007 | 50.00 |
| Return call to client | 0.2 | 12/3/2007 | 40.00 |
| Telephone call from client | 0.25 | 12/3/2007 | 50.00 |
| Electronic facsimile message from client | 0.33333 | 12/4/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 12/6/2007 | 66.67 |
| Client request for assistance on Midland Country Bank subpoena | 0.33333 | 12/12/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 12/12/2007 | 66.67 |
| Electronic facsimile message from client | 0.33333 | 12/14/2007 | 66.67 |
| Telephone call to client | 0.3 | 1/6/2008 | 60.00 |
| Telephone call to client | 0.35 | 1/6/2008 | 70.00 |
| Telephone call from client | 0.35 | 1/22/2008 | 70.00 |
| Telephone call from client | 0.2 | 1/30/2008 | 40.00 |
| Telephone call to client | 0.5 | 2/1/2008 | 100.00 |
| Telephone call to client | 0.05 | 2/1/2008 | 10.00 |
| Telephone call to client | 0.2 | 2/1/2008 | 40.00 |
| Telephone call to client | 0.2 | 2/1/2008 | 40.00 |
| Telephone call to client | 0.6 | 2/27/2008 | 120.00 |
| Telephone call from client | 0.1 | 7/24/2008 | 20.00 |
| Telephone call from client | 0.1 | 8/18/2008 | 20.00 |
| Telephone call from client | 0.1 | 8/19/2008 | 20.00 |
| Telephone call from client | 0.15 | 9/16/2008 | 30.00 |
| Telephone call from client | 0.15 | 9/22/2008 | 30.00 |
| Telephone call from client | 0.2 | 9/22/2008 | 40.00 |
| Telephone call from client | 0.15 | 10/28/2008 | 30.00 |
| Telephone call from client | 0.2 | 10/30/2008 | 40.00 |
| Telephone call from client | 0.1 | 10/30/2008 | 20.00 |
| Telephone call from client | 0.25 | 11/5/2008 | 50.00 |
| Telephone call from client | 0.1 | 11/6/2008 | 20.00 |
| Email order | 1 | 11/20/2007 | 75.00 |
| Email order | 1 | 11/21/2007 | 75.00 |
| Email order | 0.5 | 11/23/2007 | 37.50 |
| Scan subpoena | 1 | 11/29/2007 | 75.00 |
| Total | | | |

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| Bill To |
| Bob Pickle 1354 County Highway 21 Halstad, MN 56548 |

| Description | Qty | Date | Amount |
|---|---------|--------------|------------|
| Email document | 0.25 | 11/29/2007 | 18.75 |
| Phone call | 0.25 | 11/29/2007 | 18.75 |
| Email document | 0.25 | 11/30/2007 | 18.75 |
| Phone call | 0.08333 | 11/30/2007 | 6.25 |
| Subpoena Federal Court | 2 | 11/30/2007 | 150.00 |
| find letter from Hayes | 1 | 11/30/2007 | 75.00 |
| Client Copies | 3 | 12/3/2007 | 225.00 |
| phone call | 0.5 | 12/3/2007 | 37.50 |
| phone call from Pickle | 0.25 | 12/3/2007 | 18.75 |
| phone call from Pickle | 0.16667 | 12/4/2007 | 12.50 |
| Subpoena Federal Court Worcester | 2 | 12/6/2007 | 150.00 |
| Scanning Subpoena and email second time | 1 | 12/6/2007 | 75.00 |
| phone call | 0.16667 | 12/6/2007 | 12.50 |
| phone call | 0.08333 | 12/7/2007 | 6.25 |
| Called | 0.16667 | 12/7/2007 | 12.50 |
| Bob Pickle called for Motion | 0.5 | 12/10/2007 | 37.50 |
| called regarding subpoena | 0.25 | 12/10/2007 | 18.75 |
| subpoena federal court | 1 | 12/12/2007 | 75.00 |
| email order | 0.5 | 12/14/2007 | 37.50 |
| subpoena copies | 0.25 | 12/17/2007 | 18.75 |
| email order | 0.75 | 12/17/2007 | 56.25 |
| | | Total | \$9,524.00 |