

Exhibit A

Affidavit of Marc Colin

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 14-cv-2822-RPM

SANDY PHILLIPS, individually and as surviving parent
of Jessica Ghawi, decedent; LONNIE PHILLIPS,
individually and as surviving parent of Jessica Ghawi,
decedent.

Plaintiffs,

v.

LUCKY GUNNER, d/b/a/ BULKAMMO.COM,
THE SPORTSMAN'S GUIDE,
Brian Platt, d/b/a/ BTP ARMS,
Gold Strike E Commerce LLC d/b/a/
BULLETPROOFBODYARMORHQ.COM,
and JOHN DOES 1 through 10, unknown individuals.

Defendants.

AFFIDAVIT OF MARC F. COLIN RE: FEES AND COSTS

Marc F. Colin swears to the truth of the following:

1. I have been licensed to practice law in the State of Colorado and admitted to practice before the United States District Court for the District of Colorado since 1979. I have been a shareholder in the law firm of Bruno, Colin, & Lowe, P.C., and its predecessors Bruno, Colin, Jewell & Lowe, P.C. and Bruno, Bruno & Colin P.C. since 1984. Since my admission to the bar, a primary focus of my practice has been the representation of public employees and government entities in civil matters arising from the performance of their duties. I have also had extensive experience litigating issues related to the firearms industry and regarding laws governing firearms. I have litigated several hundred cases in the United States District Court for the District of Colorado since my admission to the federal bar, primarily involving Constitutional and Civil

Rights claims.

2. The law firm of Bruno, Colin & Lowe, P.C. was retained by LuckyGunner, LLC (“LG”) to defend the above captioned matter, along with co-counsel from Swanson, Martin & Bell, LLP.

3. My experienced paralegals, Lori Micucci and Marla Brock, also assisted in preparing materials and pleadings necessary to the defense of this action. Ms. Micucci became a paralegal in 1994 and joined Bruno, Colin & Lowe, P.C. in 2014. Ms. Brock became a paralegal in 1987 and joined Bruno, Bruno & Colin P.C. shortly thereafter. Both have extensive experience assisting in federal court matters.

4. During the pendency of this litigation, the scheduled hourly fees billed to LG were as follows: Marc F. Colin (MC) -- \$325 per hour; Lori Micucci (LDM) -- \$110 per hour; Marla Brock (MB) -- \$110 per hour.

5. Based on my knowledge of the prevailing rates charged by attorneys performing similar services in the state of Colorado, and combined with the expertise offered by my firm and my co-counsel of Swanson, Martin & Bell, LLP with respect to claims of this nature, it is my opinion that the fee schedule of my firm discussed above and the fee schedule discussed in the Affidavit of James B. Vogts submitted by my co-counsel is both reasonable and within the range, if not below the rates, charged by other firms providing similar services.

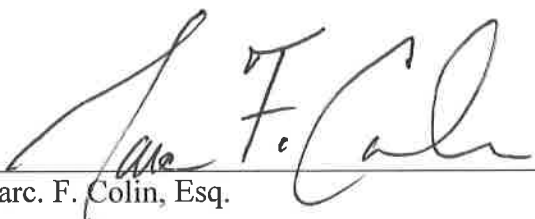
6. Attached to this Affidavit as Exhibit 1 is an itemization of the tasks billed to LG by my firm to defend this action. All of these fees and costs have been billed or will be billed to LG.

7. Based upon the legal and factual complexity of the claims of Plaintiffs’ original and amended complaints, the removal of the action to federal court, the extensive briefing and motion practice which occurred, including intervention of the Department of Justice and constitutional

and preemptive challenges to the federal and state immunity statutes, the time and entries reflected in the attached billing invoices were all reasonable and necessary for the defense of this lawsuit.

I declare under the penalty of perjury under the laws of the United States of America, and pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge and belief.

Dated this 8th day of April 2015.



Marc. F. Colin, Esq.

Exhibit 1

Invoices of Bruno, Colin, and Lowe, P.C.

BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
Denver, CO 80202

(303)831-1099

LUCKY GUNNER
[REDACTED]
[REDACTED]
[REDACTED]

Statement Date: October 31, 2014
Statement No. [REDACTED]
Account No. [REDACTED]
Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

FEES

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|--------|
| 09/22/2014 | MC | Review Amended Complaint; discuss with Jim Vogts; conference with Plaintiff's counsel Tina Habas in related case, and follow-up with Vogts regarding removal option and need to obtain preliminary hearing transcripts (1.1). | 325.00 | 1.10 | 357.50 |
| 09/26/2014 | LDM | Receive and review correspondence between MFC and James Vogst regarding obtaining a complete copy of the state court file in case no. 12CV1926 (.2); Begin retrieving 2678 pleadings in above matter at the request of James Vogst (5.6); Research on ICCES and found 2 additional cases regarding same subject matter, print docket to retrieve pleadings at a later time (.4). | 110.00 | 6.20 | 682.00 |
| 09/29/2014 | LDM | Continue pulling disclosure and discovery pleadings (1012 documents) from ICCES in case no 12CV1926 and cases 13CV810 and 14CV31829 at the request of James Vogts (5.2); Communicate with James Vogst x3 regarding cd containing court cases sent overnight on 9/30/14 (.2). | 110.00 | 5.40 | 594.00 |
| 09/30/2014 | LDM | Finalize retrieving pleadings from ICCES and scan to database in order to burn onto disc (3.8); Prepare correspondence to Mr. Vogst and send disc FedEx overnight (.3). | 110.00 | 4.10 | 451.00 |
| 10/01/2014 | LDM | Obtain pleadings in our client case- 14 CV 31946 from ICCES website (1.0); Prepare correspondence to Mr. Vogst emailing court file in above case (.2); Prepare pleadings index and pleadings notebook in above matter to be given to co-counsel at meeting on 10/2/14 (1.2); Begin drafting pleadings index in 12 CV 1926 case (NC 4.1). | 110.00 | 2.40 | 264.00 |

LUCKY GUNNER

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|----------|
| 10/02/2014 | MC | Review original Complaint and all pleadings; telephone conference with co-counsel Vogts and Lothson; review original and Amended Complaint in Phillips et al v Century Theaters, et al, research joinder and indispensable party rules (CR Civ. Pro 17, 18 and 19) and follow-up with co-counsel regarding strategy and concerns (2.8). | 325.00 | 2.80 | 910.00 |
| | MC | Confer with co-counsel regarding representation of BulletProof Body Armor defendant and follow-up with Andy Lothson regarding same (.6). | 325.00 | 0.60 | 195.00 |
| | LDM | Begin to prepare pleadings index and pleadings notebook in case no. 12 CV 1926- 2819 documents (NC 4.8) Prepare disclosure and discovery pleadings index and disclosure and discovery notebook in consolidated case 12 CV 1926 (NC 1.7). | | 6.50 | n/c |
| 10/03/2014 | MC | Meeting to discuss initial strategy and Motion to Dismiss (.4). | 325.00 | 0.40 | 130.00 |
| | LDM | Finalize creating a pleadings index in case no. 12 CV 1926 (NC 2.3); Scan article from Law Week Colorado regarding client's case (.2); Prepare correspondence to Mr. Vogst with copy of Law Week article, mail same (.2); Pull Plaintiffs' original complaint and amended complaint from consolidated case for review by MFC (.3). | 110.00 | 0.70 | 77.00 |
| | | For Current Services Rendered | | 23.70 | 3,660.50 |
| | | Total Non-billable Hours | | 6.50 | |

Recapitulation

| <u>Timekeeper</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|-------------|--------------|
| Marc F. Colin | 4.90 | \$325.00 | \$1,592.50 |
| Lori Micucci | 18.80 | 110.00 | 2,068.00 |

Advances

| | | |
|------------|-----------------------------------|-------------------|
| 09/26/2014 | Records | 40.00 |
| 10/03/2014 | 3,892 photocopies at \$0.20 each. | 778.40 |
| | Total Advances | 818.40 |
| | Total Current Work | 4,478.90 |
| | Balance Due | <u>\$4,478.90</u> |

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Please include file number with payment
Payment is due within 20 days of statement date.

BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
Denver, CO 80202

(303)831-1099

LUCKY GUNNER
[REDACTED]
[REDACTED]
[REDACTED]

Statement Date November 11, 2014
Statement No. [REDACTED]
Account No. [REDACTED]
Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Previous Balance \$4,478.90

FEES

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|--------|
| 10/07/2014 | LDM | Add disclosure documents individually to pleadings index in case no. 12 CV 1926 (NC 2.1). | | 2.10 | n/c |
| 10/08/2014 | MC | Review draft Petition for Removal; follow-up with co-counsel regarding representation in draft that the value of the claims at issue exceeds \$75,000 despite the fact that only injunctive relief is sought by Plaintiffs; review cited authority on support of this contention and draft declaration from client regarding same, and follow-up with co-counsel to finalize petition and exhibits (2.4). | 325.00 | 2.40 | 780.00 |
| | LDM | Tab pleadings to correlate with pleadings index in case no. 12 CV 1926 (NC 2.7); Receipt and review emails with co-counsel regarding notice of removal in district court and filing notice of removal in state court (.3). | 110.00 | 0.30 | 33.00 |
| 10/09/2014 | LDM | Tab pleadings to correlate with pleadings index in case nos. 14 CV 31829 and 13 CV 810 (1.7 NC). | | 1.70 | n/c |
| 10/10/2014 | MC | Review draft Motion to Dismiss; follow-up with co-counsel Jim Vogts regarding potential additional supporting authority on duty/special relationship issue and Colorado law on negligent entrustment (1.3). | 325.00 | 1.30 | 422.50 |
| | LDM | Check the docket on ICCES for additional documents filed in case (.3); Prepare file with 2 new motions filed in case (.3) Prepare email correspondence to Andrew Lothson with current state file pleadings and docket (.2); Update pleadings index (.3 NC). | 110.00 | 0.80 | 88.00 |

November 11, 2014

LUCKY GUNNER

Account No: [REDACTED]

Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|--------|
| 10/13/2014 | MC | Locate and review Columbine cases most relevant to duty/special relationship analysis, <u>DeShaney v Winnebago</u> decision and majority and dissenting opinions in <u>Gonzales v Castle Rock</u> ; prepare correspondence to co-counsel regarding same; redact legal analysis correspondence on negligent entrustment and forward to co-counsel (1.4). | 325.00 | 1.40 | 455.00 |
| | MB | Conferences MFC re: briefing on police duty to protect public and negligent entrustment issues (.2); research office case files and court documents, email to MFC with Gonzales v. Castle Rock Supreme Court Opinion and legal memo re: negligent entrustment (.4). | 110.00 | 0.60 | 66.00 |
| | LDM | Receipt and profile emails between co-counsel and MFC regarding removal to federal court (.3 NC). | | 0.30 | n/c |
| 10/14/2014 | MB | Research federal court ECF and review Gonzales v Castle Rock district and appellate courts docket reports for case and briefing information and date of archiving records, save reports to file for reference and email to MFC noticing briefs not available through ECF (.5); further internet research to locate appellate briefs and confer with JDW re: follow up with court clerk on availability of hard copy briefs and other potential sources (.5). | 110.00 | 1.00 | 110.00 |
| | MC | Confer with co-counsel (x 2) regarding options on filing Request to Exceed Page Limits on Motion to Dismiss, and timing of filing Petition to Remove and Motion to Dismiss (.4). | 325.00 | 0.40 | 130.00 |
| 10/15/2014 | MB | Save to file Gonzales v. Castle Rock Supreme Court Opinion and USDC and USCA docket reports for reference in obtaining appellate brief (.1); correspond with O'Hayre/SGR, save to file Defendants' 10th Circuit Answer brief and email to MFC (.4). | 110.00 | 0.50 | 55.00 |
| | LDM | Receipt, review and respond to email from Andy Lothson regarding checking to see if additional pleadings have been filed (.2); Check ICCES for updated docket to be filed with removal pleadings (.2). | 110.00 | 0.40 | 44.00 |
| 10/16/2014 | LDM | Receipt, review and profile email from Andy Lothson regarding filing of notice of removal in District Court and request to file notice with Arapahoe County Court (.2); Review format of pleading and re format to court's rules (1.0); Create caption for state court (.6); Incorporate Mr. Lothson's wording from notice of removal into reformatted pleading (.2); Submit to ICCES our Notice of Removal (.2); Prepare correspondence to Mr. Lothson with ICCES receipt of accepted filing (.2). | 110.00 | 2.40 | 264.00 |
| | MC | Confer with co-counsel regarding assignment of case to Judge Matsch and Magistrate Shaffer; prepare brief bios of each with my observations and experience with both; discuss rules regarding Notice of Related Cases and whether cases before Judge Jackson should be identified (.6). | 325.00 | 0.60 | 195.00 |
| 10/17/2014 | LDM | Receipt, review and profile emails from Andy Lothson regarding notice of who judge is in district court matter and notice to file our entry of appearance (.3); Draft our Entry of Appearance (.3); Submit to CM/ECF and co-counsel our entry of appearance (.2).; | | | |

November 11, 2014

LUCKY GUNNER

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|----------|
| | | Pull docket from current case to retrieve all documents that have been filed by co-counsel (.6); Retrieve Entry of Appearance by Paul Rodney, Esq. and Thomas Stoeber, Esq. (.2).; Update pleadings notebook and pleadings index (2.1 NC). | 110.00 | 1.60 | 176.00 |
| 10/20/2014 | MC | Review final draft of Motion to Dismiss; confer with co-counsel regarding media requests and Fafinski, Mark and Johnson firm entered on behalf of co-Defendant Sportsman's Guide (.8). | 325.00 | 0.80 | 260.00 |
| 10/21/2014 | LDM | Retrieve Entry of Appearance by Peter Carlson, Esq, Phillip Zuber, Esq., and Bruce Montoya, Esq. (.3 NC); Update pleadings notebook and pleadings index (.6 NC). | | 0.90 | n/c |
| 10/22/2014 | MC | Review Motion to Dismiss of BTP Arms and confer with co-counsel regarding potential need to expand arguments and provide U. S. Supreme Court and 10th Circuit Court of Appeals authority, and to supplement Colorado authority on negligent entrustment on "lack of duty" and "special relationship" exceptions (.9). | 325.00 | 0.90 | 292.50 |
| | LDM | Retrieve from CM/ECF system, Motion to Dismiss For Failure to State a Claim by Defendant Brian Platt (.2 NC); Update pleadings notebook and pleadings index (.4 NC); Receipt, scan and file into case file, various emails between counsel regarding co-counsel's motion to dismiss (.2 NC). | | 0.80 | n/c |
| 10/24/2014 | MC | Review Motion to Dismiss of Sportsman's Guide and follow-up with co-counsel regarding [REDACTED] for Bulletproof Body Armor (.7). | 325.00 | 0.70 | 227.50 |
| 10/27/2014 | LDM | Update file with email communication between counsel (.3 NC). | | 0.30 | n/c |
| 10/29/2014 | LDM | Update pleadings index and pleadings file (.6 NC). | | 0.60 | n/c |
| 10/30/2014 | MC | Telephone conference with Corporate Counsel for client regarding recovery of fees (.3 NC); telephone conference with Plaintiff's counsel regarding consolidated response to Motions to Dismiss and extension of time (.3); follow-up with co-counsel regarding same (.1). | 325.00 | 0.40 | 130.00 |
| | LDM | Receipt and review emails between counsel regarding plaintiffs' request for an extension (.2 NC). | | 0.20 | n/c |
| | | For Current Services Rendered | | 16.50 | 3,728.50 |
| | | Total Non-billable Hours | | 6.90 | |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|----------------|-------|----------|------------|
| Marc F. Colin | 8.90 | \$325.00 | \$2,892.50 |
| Lori Micucci | 5.50 | 110.00 | 605.00 |
| Marla A. Brock | 2.10 | 110.00 | 231.00 |

LUCKY GUNNER

November 11, 2014

Account No: [REDACTED]
 Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
 LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Advances

| | | |
|------------|---------------------------------|-------------------|
| 10/06/2014 | Overnight Courier | 33.46 |
| 10/14/2014 | Records from PACER | 2.40 |
| 10/16/2014 | Filing Fee through ICCES | 13.50 |
| 10/17/2014 | Answer Filing Fee | 158.00 |
| 10/17/2014 | Records from PACER | 11.80 |
| 10/20/2014 | Records from PACER | 0.30 |
| 10/22/2014 | Records from PACER | 34.90 |
| 10/29/2014 | Records from PACER | 0.20 |
| 10/31/2014 | 408 photocopies at \$0.20 each. | 81.60 |
| | Total Advances | <u>336.16</u> |
| | Total Current Work | 4,064.66 |
| | Balance Due | <u>\$8,543.56</u> |

Aged Due Amounts

| | | | | | | |
|--|-------------|--------------|--------------|---------------|----------------|-------------|
| | <u>0-30</u> | <u>31-60</u> | <u>61-90</u> | <u>91-120</u> | <u>121-180</u> | <u>181+</u> |
| | 8,543.56 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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 Please include file number with payment
 Payment is due within 20 days of statement date.

BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
Denver, CO 80202

(303)831-1099

LUCKY GUNNER
[REDACTED]
[REDACTED]
[REDACTED]

Statement Date: December 5, 2014

Statement No. [REDACTED]

Account No. [REDACTED]

Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Previous Balance \$8,543.56

FEES

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|--------|
| 11/04/2014 | MC | Review draft Motion to Reset Response and Reply deadlines and prepare correspondence to co-counsel regarding my concerns and suggested response (.4). | 325.00 | 0.40 | 130.00 |
| 11/05/2014 | MC | Follow-up with Plaintiff's counsel and co-counsel regarding proposed Joint Motion for Enlargement of Time (.3). | 325.00 | 0.30 | 97.50 |
| | LDM | Receipt notice from CM/ECF system and retrieve document, review and calendar deadline and profile Unopposed Motion For Modified Briefing Schedule Regarding Motions to Dismiss with Order (.2 NC). | | 0.20 | n/c |
| | | For Current Services Rendered | | 0.70 | 227.50 |
| | | Total Non-billable Hours | | 0.20 | |

Recapitulation

| <u>Timekeeper</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|-------------|--------------|
| Marc F. Colin | 0.70 | \$325.00 | \$227.50 |

Total Current Work 227.50

Payments

| | | |
|------------|----------------------|-----------|
| 11/21/2014 | Payment - thank you. | -4,478.90 |
| 11/26/2014 | Payment - thank you. | -4,064.66 |
| | Total Payments | -8,543.56 |

LUCKY GUNNER

Page: 2

December 05, 2014

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Balance Due

\$227.50

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Please include file number with payment
Payment is due within 20 days of statement date.

BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
 Denver, CO 80202

(303)831-1099

LUCKY GUNNER
 [REDACTED]
 [REDACTED]
 [REDACTED]

Statement Date: January 14, 2015
 Statement No. [REDACTED]
 Account No. [REDACTED]
 Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Previous Balance \$227.50

FEES

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|--------|
| 12/03/2014 | LDM | Receipt notification from CM/ECF system, retrieve and review Plaintiffs' Opposition to Defendants' Motions to Dismiss, and Plaintiffs' Notice of Constitutional Challenge pleadings (NC .2). | | 0.20 | n/c |
| 12/08/2014 | MC | Review Plaintiffs' Response Brief and Notice of Constitutional Challenge; draft e-mail to co-counsel regarding initial thoughts regarding same (1.2). | 325.00 | 1.20 | 390.00 |
| | MC | Conference call with co-counsel regarding Reply strategy (.3 NC). | | 0.30 | n/c |
| | | For Current Services Rendered | | 1.20 | 390.00 |
| | | Total Non-billable Hours | | 0.50 | |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---------------|-------|----------|----------|
| Marc F. Colin | 1.20 | \$325.00 | \$390.00 |

Total Current Work 390.00

Payments

01/13/2015 Payment - thank you. -227.50

Balance Due \$390.00

LUCKY GUNNER

Page: 2
January 14, 2015

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

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BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
Denver, CO 80202

(303)831-1099

LUCKY GUNNER
[REDACTED]
[REDACTED]
[REDACTED]

Statement Date: February 9, 2015
Statement No. [REDACTED]
Account No. [REDACTED]
Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Previous Balance \$390.00

FEES

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|--------|
| 01/06/2015 | MC | Telephone call with Andy Lothson regarding Reply, State Attorney General briefing and timing of our filing, and potential of certification of certain issues to Colorado S. Court. (0.2). | 325.00 | 0.20 | 65.00 |
| 01/13/2015 | LDM | Update pleadings index (0.8)(NC). | | 0.80 | n/c |
| 01/14/2015 | MC | Review Defendant Platt's Reply memorandum and Sportsman's Guide Reply and Brief in support of motions to dismiss (0.6-NC) | | 0.60 | n/c |
| 01/28/2015 | MC | Review correspondence from AUSA seeking permission to intervene; follow-up with clients and respond to AUSA (.2). | 325.00 | 0.20 | 65.00 |
| 01/29/2015 | LDM | Update pleadings index (NC 1.2). | | 1.20 | n/c |
| | | For Current Services Rendered | | 0.40 | 130.00 |
| | | Total Non-billable Hours | | 2.60 | |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---------------|-------|----------|----------|
| Marc F. Colin | 0.40 | \$325.00 | \$130.00 |

Total Current Work 130.00

Balance Due \$520.00

LUCKY GUNNER

Page: 2
February 09, 2015

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

| Aged Due Amounts | | | | | |
|------------------|--------------|--------------|---------------|----------------|-------------|
| <u>0-30</u> | <u>31-60</u> | <u>61-90</u> | <u>91-120</u> | <u>121-180</u> | <u>181+</u> |
| 520.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
Denver, CO 80202

(303)831-1099

LUCKY GUNNER
[REDACTED]
[REDACTED]
[REDACTED]

Statement Date: March 10, 2015
Statement No. [REDACTED]
Account No. [REDACTED]
Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Previous Balance \$520.00

FEES

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|--------|
| 02/02/2015 | MC | Review Notice of Intervention and Memorandum in Support of Constitutionality of PLCA (.4). | 325.00 | 0.40 | 130.00 |
| 02/05/2015 | LDM | Receipt and review court order setting motions to dismiss hearing on March 16, 2015 (.2 NC); Receipt and review entry of appearance by James Vogts, Esq. NC (.2); Update pleadings index (.4 NC). | | 0.80 | n/c |
| 02/24/2015 | MC | Review comments of co-counsel on Plaintiff's Response to DOJ's brief and respond (.3 NC). | | 0.30 | n/c |
| | | For Current Services Rendered | | 0.40 | 130.00 |
| | | Total Non-billable Hours | | 1.10 | |

Recapitulation

| <u>Timekeeper</u> | <u>Hours</u> | <u>Rate</u> | <u>Total</u> |
|-------------------|--------------|-------------|--------------|
| Marc F. Colin | 0.40 | \$325.00 | \$130.00 |

Total Current Work 130.00

Payments

| | | |
|------------|----------------------|---------|
| 02/06/2015 | Payment - thank you. | -390.00 |
| 02/26/2015 | Payment - thank you. | -130.00 |
| | Total Payments | -520.00 |

Page: 2
March 10, 2015

LUCKY GUNNER

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Balance Due

\$130.00

We accept all major credit cards.
Please include file number with payment
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BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
Denver, CO 80202

(303)831-1099

LUCKY GUNNER
[REDACTED]
[REDACTED]
[REDACTED]

Statement Date: April 6, 2015
Statement No. [REDACTED]
Account No. [REDACTED]
Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Previous Balance \$130.00

FEES

| | | | Rate | Hours | |
|------------|-----|---|--------|-------|--------|
| 03/12/2015 | LDM | 15105 Begin update of file for use at hearing on 3/16/15 (NC 1.4). | | 1.40 | n/c |
| 03/13/2015 | LDM | Update pleadings notebook, index and file for review by MFC in preparation for hearing on 3/16/15 (NC 2.6). | | 2.60 | n/c |
| 03/16/2015 | MC | Meet with co-counsel to discuss strategy for argument (1.1); meeting with co-counsel and clients for lunch and to discuss case (1.5 NC); Court appearance for hearing on Motion to Dismiss (1.2). | 325.00 | 2.30 | 747.50 |
| | | For Current Services Rendered | | 2.30 | 747.50 |
| | | Total Non-billable Hours | | 4.00 | |

Recapitulation

| <u>Timekeeper</u> | Hours | Rate | Total |
|-------------------|-------|----------|----------|
| Marc F. Colin | 2.30 | \$325.00 | \$747.50 |

Total Current Work 747.50

Balance Due \$877.50

Aged Due Amounts

| 0-30 | 31-60 | 61-90 | 91-120 | 121-180 | 181+ |
|--------|-------|-------|--------|---------|------|
| 877.50 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

LUCKY GUNNER

Page: 2
April 06, 2015

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

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BRUNO, COLIN, AND LOWE, P.C.

1999 Broadway, Suite 4300
 Denver, CO 80202

(303)831-1099

LUCKY GUNNER
 [REDACTED]
 [REDACTED]
 [REDACTED]

Statement Date: April 9, 2015
 Statement No. [REDACTED]
 Account No. [REDACTED]
 Page: 1

RE: LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL

LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

Previous Balance \$877.50

FEES

| | | | Rate | Hours | |
|------------|-----|--|--------|-------|--------|
| 03/30/2015 | LDM | Download docket from CM/ECF website for MFC to identify which pleadings to send to Counsel (NC .1); Prepare pleadings and exhibits and email same to counsel x3 from Carani v. Meisner, et al case (NC 2.0). | | 2.10 | n/c |
| | JPE | Review assignment from MFC regarding Attorney-Client Privilege as it relates to client advisements of potential liability and fee agreements and conducted preliminary research (0.2)NC | | 0.20 | n/c |
| | MC | Conference call with co-counsel and client representative regarding Order granting Motion to Dismiss and to discuss Attorney Fee Award and under 13-21-504.5 and potential Motion requesting award under 13-17-201 (.3); review Carani file and identify pleadings and Orders relating to seeking modification of attorney fee award to include Plaintiff's counsel and applicable procedures for doing so (.4); prepare research assignment memorandum to Law Clerk regarding potential for discovery to Plaintiff seeking any indemnity agreement between Plaintiff and Plaintiff's counsel (.3); compare and contrast 13-21-504.5 and 13-1-201 to determine any potential benefit to requesting award under 13-17-201 (.3). | 325.00 | 1.30 | 422.50 |
| | MC | Review Order dismissing case and awarding fees (.4). | 325.00 | 0.40 | 130.00 |
| 03/31/2015 | JPE | Conducted research on Attorney-Client Privilege as it relates to client advisements of potential liability and fee agreements; phone call to MFC to clarify the scope of the assignment and the Brady Center's legal relationship to the plaintiff (0.1)NC; drafted and sent electronic memo to MFC for review (2.8 NC). | | 2.80 | n/c |

LUCKY GUNNER

Account No: [REDACTED]
Statement No: [REDACTED]

LUCKY GUNNER D/B/A/ BULKAMMO.COM ADV PHILLIPS ETAL
LUCKY GUNNER D/B/A/ BULKAMMO.COM

NON LE

| | | | Rate | Hours | |
|------------|----|---|--------|-------|----------|
| 04/06/2015 | MC | Conference call with co-counsel and client representatives regarding A. Lothson's conference with opposing counsel (Stover) regarding attorneys' fees and costs award, and to discuss strategy moving forward on attorney fee and cost issues, potential Motion for enlargement of Time, potential Motion for and award of fees under CRS 13-17-201 and potential Motion for fees to be awarded jointly and severally against Plaintiffs' counsel; also discuss potential discovery directed to existence of indemnity agreement between Plaintiff and Brady Center and/or Arnold and Porter (1.4). | 325.00 | 1.40 | 455.00 |
| 04/07/2015 | MC | Review proposed redactions to invoices by client and respond to same (.2). | 325.00 | 0.20 | 65.00 |
| | MC | Telephone conference with co-counsel (Lothson) regarding his recent contacts with opposing counsel (Stover); review draft e-mail to Stover, client's revisions to same, and suggest additional changes; review and approve final draft (.6). | 325.00 | 0.60 | 195.00 |
| | | For Current Services Rendered | | 3.90 | 1,267.50 |
| | | Total Non-billable Hours | | 5.10 | |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---------------|-------|----------|------------|
| Marc F. Colin | 3.90 | \$325.00 | \$1,267.50 |

Total Current Work 1,267.50

Balance Due \$2,145.00

Aged Due Amounts

| 0-30 | 31-60 | 61-90 | 91-120 | 121-180 | 181+ |
|----------|-------|-------|--------|---------|------|
| 2,145.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

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