

Exhibit 1

SASSCER, CLAGETT & BUCHER

5407 WATER STREET, SUITE 101
 UPPER MARLBORO, MD 20772
 (301) 627-5500 (301) 627-4156 FAX
 TAX IDENTIFICATION NO. 52-0609117

January 21, 2015

Invoice # 42097

Brian Platt
 BTP Arms
 214 West Golden Lane
 New Oxford, PA 17350

Re: Phillips, et al. v. BTP Arms, et al.
 Our File No. 6470/39516

Date of Last Bill: 01/01/1900	\$0.00
Payments received since last bill (last payment 01/01/1900)	\$0.00
Net balance forward	\$0.00
PROFESSIONAL SERVICES	Hours

09/24/2014	PRZ	Review of Complaint; meeting with client [REDACTED] [REDACTED]	1.50
09/25/2014	JVW	Search for docket entries.	0.20
09/29/2014	PRZ	Review of research on potential local counsel and Arapahoe County; draft lengthy e-mail to [REDACTED] [REDACTED] regarding possible retention as local counsel	0.90
09/29/2014	PRZ	Receipt of memorandum from [REDACTED] re: Conflict.	0.10
09/29/2014	PRZ	Draft memorandum to [REDACTED] re: Amended Complaint.	0.10
09/29/2014	PRZ	Draft memorandum to [REDACTED] re: Amended Complaint.	0.10
09/30/2014	PRZ	Draft memorandum to [REDACTED] regarding [REDACTED]	0.10

BTP Arms

Page 2

[REDACTED]

09/30/2014 PRZ Review of biographies of potential local counsel; draft memorandum to Messrs. [REDACTED]
[REDACTED]

09/30/2014 PRZ Draft memorandum to Brian Platt re: [REDACTED]
[REDACTED]

09/30/2014 PRZ Draft memorandum to [REDACTED]
[REDACTED]

10/01/2014 PRZ Receipt of memorandum from Andrew Lothson re:
[REDACTED]

10/01/2014 PRZ Draft memorandum to client regarding [REDACTED]
[REDACTED]

10/01/2014 PRZ Review of Notice of Removal; review of citations in support of removal

10/01/2014 PRZ Lengthy telephone conference with Mr. Lothson regarding [REDACTED]
[REDACTED]

10/01/2014 PRZ Telephone conference with [REDACTED]
[REDACTED]

10/01/2014 PRZ Research on [REDACTED]
[REDACTED] regarding potential retention; draft memorandum to same

10/01/2014 PRZ Legal research on statutory protection for gun and ammunition sellers; legal research on negligent entrustment under Colorado law

10/01/2014 PRZ Draft memorandum to client regarding [REDACTED]
[REDACTED]

10/02/2014 JWV Draft memorandum to co-defendant counsel re:
[REDACTED]

10/02/2014 JWV Draft and submit application to U.S. District Court for Colorado.

10/02/2014 JWV Upload pleadings filed sent by defense counsel; draft index of pleadings.

BTP Arms		Page	3
10/02/2014	PRZ	Review of application for admission to U.S. Dist. Court for Colorado; review of Local Rules	0.60
10/02/2014	PRZ	Draft memorandum to client regarding [REDACTED]	0.20
10/02/2014	PRZ	Lengthy telephone conference with Mr. Lothson regarding [REDACTED]	0.40
10/03/2014	PRZ	Comprehensive outlining of Amended Complaint to prepare for motion to dismiss	1.20
10/03/2014	PRZ	Legal research on duty of care/negligence issues involving the use of firearms, ammunition and tear gas	0.90
10/03/2014	PRZ	Receipt and review of materials from [REDACTED]	0.10
10/05/2014	PRZ	Draft lengthy memorandum to client regarding [REDACTED]	0.40
10/06/2014	PRZ	Review of Memorandum Opinion denying defense motions for summary judgment in Alexrod v. Century Theater case	0.40
10/06/2014	PRZ	Detailed review of materials provided by client [REDACTED]	0.90
10/06/2014	PRZ	Legal research on all state statutes on tear gas sales, possession and use; multiple searches for any Colorado statute governing use of tear gas	1.50
10/06/2014	PRZ	Begin legal research on Colorado law on negligent entrustment; examine other state decisional law for negligent entrustment cases relating to tear gas	0.50
10/06/2014	PRZ	Begin draft memorandum of law in support of motion to dismiss; draft preliminary statement, alleged facts, nature of claims and standard of review; begin outline of arguments	2.30
10/13/2014	PRZ	Further work on motion to dismiss; partial revisions to portion of draft memorandum of law; review of	1.30

BTP Arms	Page	4
various state statutes on teargas possession and use; review associated cases		
10/13/2014 PRZ	Review of first draft of motion to dismiss [REDACTED] [REDACTED]	0.60
10/13/2014 PRZ	Further legal research on claims of negligent entrustment under Colorado law; review and analyze multiple cases decided in Colorado	1.30
10/13/2014 PRZ	Further legal research on cases rejecting general negligence theories against sellers of guns and ammunition, including Maryland and New York cases	0.80
10/13/2014 PRZ	Lengthy telephone conference with Mr. Lothson regarding [REDACTED]	0.30
10/13/2014 PRZ	Legal research on public nuisance statutes in Colorado and Aurora County; find and review public nuisance cases in Colorado and other states and elements for injunctive relief; further review of <i>draft</i> Motion to Dismiss by Lucky Gunner	1.70
10/14/2014 PRZ	Further legal research on and review and analysis of Colorado cases on negligent entrustment; draft portion of Memorandum of Law on negligent entrustment claim; review of Dobbs, The Law of Torts (2nd edition); review of Restatement sections 308 and 390 and comments	2.20
10/14/2014 PRZ	Further legal research on and review and analysis of Colorado cases on negligence and foreseeability; draft portion of Memorandum of Law on negligence claim	1.30
10/14/2014 PRZ	Further drafting of Memorandum of Law relating to preliminary statement and statement of facts	0.50
10/15/2014 JWV	Format and revisions to Memorandum of Law Supporting Motion to Dismiss.	0.80
10/15/2014 JWV	Shepardize cases cited in Memorandum of Law (Ashcraft v. Igbal, 556 US. 662, 129 S.Ct. 1937 (2009), Bell Atlantic v. Twombly, 550 US 544, 127 S.Ct. 1955(2007), Baker v. Bratrsovsky, 689 P.2d 722(Colo. App 1984), Leibelt v. Bob Penkhus Volvo-Mazda, 961 P.2d 1147 (Colo. App. 1998),	0.40

BTP Arms

Page 5

Perreira v. State, 768 P.2d 1147 (Colo. App. 1998),
 Perreira v. State, 768 P.2d 1198 (Colo. 1989), Univ.
 of Denver v. Whitlock, 744 P.2d 54 (Colo. 1987),
 Valentine v. On Target, 353 Md. 544, 527 A2d
 947(1999), Hampton v. Beretta USA Corp., 96 NY2d
 222, 750 N.E. 2d loss (2001), Sanders v. Acclaim
 Entertainment, 188 F. Supp 2d 1964 (Colo. 2002),
 Walcott v. Total Petroleum, 964 P.2d 609 (Colo.
 App. 1998), Reigel v. Savasenoir Care, 292 P.3d 977
 (Colo. App. 20011), Smith v. State Comp., 749 P.2d
 462 (Colo. App. 1987), Dpt. of Health v. The Mill,
 887 P.2d 993 (Colo. 1994), Monsanto Co. v.
 Geertson Seed Farms, 561 U.S. 139, 130 S. Ct. 2743
 (2010), Schrier v. Univ. of Co., 427 F.3d 1253 (10th
 Cir. 2005) and Employment Tel. Enter. v. Barocas,
 100 P.3d 37 (Colo. App. 2004).

10/15/2014	PRZ	Further drafting and research on negligence issues, including foreseeability and causation	1.50
10/15/2014	PRZ	Further legal research on public nuisance and drafting of portion of Memorandum of Law on public nuisance claim	1.10
10/15/2014	PRZ	Further legal research on and drafting of portion of Memorandum of Law on right to injunctive relief.	0.90
10/15/2014	PRZ	Draft Conclusion to Memorandum of Law	0.30
10/15/2014	PRZ	Review and initial revisions to draft Memorandum of Law	0.70
10/15/2014	PRZ	Draft memorandum to Mr. Montoya regarding status of drafting and filing of memorandum of law	0.20
10/15/2014	WNZ	Review/analyze proposed Memorandum of Law supporting Motion to Dismiss; discuss with PRZ.	0.40
10/16/2014	JVW	Draft Points & Authorities (status, codes and cases) to Motion to Dismiss; re-format to comply with local rules; draft proposed Order.	1.40
10/16/2014	JVW	Review and revisions to Motion to Dismiss.	0.30
10/16/2014	PRZ	Review and revisions to new draft Motion to Dismiss and Memorandum in Support	0.40
10/16/2014	PRZ	Draft memorandum to client regarding [REDACTED]	0.20

BTP Arms	Page 6
10/16/2014 PRZ	[REDACTED] Draft memorandum to Mr. Montoya regarding [REDACTED] [REDACTED]
10/16/2014 PRZ	Draft memorandum to counsel for Lucky Gunner regarding [REDACTED]
10/16/2014 PRZ	Further review and drafting of Motion to Dismiss and Memorandum of Law
10/17/2014 JWV	Download Federal filings by counsel by L. Gunner; compare to previous drafts provided by counsel; draft memorandum to PRZ re: comparisons of LG's draft Motion to Dismiss and Memorandum of Law with filed versions.
10/17/2014 JWV	Retrieve docket entries in Federal case ; retrieve Notice re: Magistrate judge; retrieve entry of appearance of counsel for Lucky Gunner.
10/17/2014 JWV	Draft Entry of Appearance of PRZ.
10/17/2014 PRZ	Review of Notice of Removal and extensive attachments
10/17/2014 PRZ	Lengthy telephone conference with counsel for Lucky Gunner regarding [REDACTED] [REDACTED]
10/18/2014 PRZ	Further legal research on Colorado standards for injunctive relief and whether Eric RR v. Thompkins requires application of state or federal standards; revisions to Motion to Dismiss and Memorandum
10/18/2014 PRZ	Draft memorandum to Mr. Montoya regarding [REDACTED] [REDACTED]
10/21/2014 JWV	Incorporate Motion to Dismiss suggested changes/ revisions by [REDACTED]
10/21/2014 JWV	Download Notices of entry of Appearances from PACER for plaintiffs' counsel, Lucky Gunner and The Sportsman Guide.
10/21/2014 JWV	Finalize Notice of Entry of Appearance; e-file.

BTP Arms			Page	7
10/21/2014	PRZ	Based on input and comments of Mr. Montoya, further revisions to draft Motion to Dismiss and Supporting Memorandum; final review of same	1.20	
10/21/2014	PRZ	Draft memorandum to Mr. Montoya regarding [REDACTED]	0.20	
10/22/2014	JVW	Finalize Motion to Dismiss and proposed Order; e-file.	0.40	
10/22/2014	PRZ	Draft memorandum to client regarding [REDACTED]; review of Local Rules for timing of opposition	0.20	
10/31/2014	PRZ	Draft memorandum to Mr. Montoya regarding [REDACTED]	0.20	
11/06/2014	JVW	Draft correspondence to Brian Platt re: [REDACTED]	0.10	
12/17/2014	PRZ	Detailed review and analysis of Plaintiffs' Opposition to Motions to Dismiss; draft memorandum to client [REDACTED]	1.10	
12/17/2014	PRZ	Begin drafting Reply Memorandum	2.80	
12/18/2014	PRZ	Further legal research on and drafting of Reply Memorandum (negligence and breach of duty issues and cases cited by Plaintiffs)	1.20	
12/22/2014	PRZ	Further legal research on and drafting of Reply Memorandum	2.30	
12/22/2014	PRZ	Review and revisions to corrected first draft of Reply Memorandum	0.80	
12/22/2014	PRZ	Draft memorandum to client regarding [REDACTED] draft memorandum to Mr. Montoya [REDACTED]	0.20	
12/23/2014	JVW	Final review and revisions to first draft Platt's Reply Memorandum	0.70	
12/23/2014	PRZ	Further work on and revisions to draft Reply Memorandum	0.50	
01/05/2015	PRZ	Lengthy telephone conference with Mr. Lothson regarding [REDACTED]	0.30	

BTP Arms			Page	8
01/07/2015	PRZ	Detailed review of proposed revisions to Reply Memorandum by [REDACTED]; further review and revisions to Reply Memorandum	1.90	
01/07/2015	PRZ	Review and analysis of Lucky Gunner's Reply Memorandum	0.50	
01/07/2015	PRZ	Review of corrected new revision of Reply Memorandum; revisions to same.	0.70	
01/07/2015	PRZ	Draft memorandum to Mr. Lothson, counsel for Lucky Gunner	0.10	
01/07/2015	PRZ	Draft memorandum to Mr. Montoya regarding [REDACTED]	0.20	
01/07/2015	PRZ	Draft memorandum to Mr. Platt regarding [REDACTED] draft memorandum to JWV regarding same	0.20	
01/08/2015	JWV	Final review and correct check to Reply Memorandum; draft memorandum to Messrs. [REDACTED]	0.30	
01/08/2015	PRZ	Lengthy telephone conference with Mr. Lothson regarding [REDACTED]	0.40	
01/08/2015	PRZ	Review and revisions to proposed Reply Memorandum to include [REDACTED] legal research and review of cases on predominant cause	1.10	
01/08/2015	PRZ	Receipt of memorandum from Bruce Montoya re: [REDACTED]	0.10	
01/09/2015	JWV	Final review and revisions (for revisions) to Reply Memorandum; e-file.	0.60	
01/09/2015	PRZ	Final review of Reply Memorandum	0.30	
			<hr/>	<u>Amount</u>
		For professional services rendered	61.80	\$16,807.50
 DISBURSEMENTS				
01/31/2015	PO	Postage		3.92

BTP Arms

Page 9

Total disbursements

\$3.92

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Wilde, Joan V.	0.00	0.00	\$0.00
Wilde, Joan V.	9.90	125.00	\$1,237.50
Zuber, Phillip R.	0.00	0.00	\$0.00
Zuber, Phillip R.	51.50	300.00	\$15,450.00
Zifchak, William N.	0.40	300.00	\$120.00



BILLING SUMMARY

Total professional services	\$16,807.50
Total disbursements	\$3.92
Balance due	\$16,811.42

[JP01]

SASSCER, CLAGETT & BUCHER

**5407 WATER STREET, SUITE 101
 UPPER MARLBORO, MD 20772
 (301) 627-5500 (301) 627-4156 FAX
 TAX IDENTIFICATION NO. 52-0609117**

April 20, 2015

Invoice # 42517

Brian Platt
 BTP Arms
 214 West Golden Lane
 New Oxford, PA 17350

**Re: Phillips, et al. v. BTP Arms, et al.
 Our File No. 6470/39516**

Date of Last Bill: 01/21/2015	\$16,811.42
Payments received since last bill (last payment 02/04/2015)	\$16,811.42
Net balance forward	\$0.00
PROFESSIONAL SERVICES	Hours

01/28/2015 PRZ	Draft memorandum to counsel for United States regarding consent to intervention to support constitutionality of Lawful Commerce in Arms Act	0.10
02/04/2015 PRZ	Draft memorandum to client [REDACTED]	0.10
02/04/2015 PRZ	Review of Memorandum of the United States on the constitutionality of the Protection of Lawful Commerce in Arms Act; draft memorandum to client [REDACTED]	0.40
02/05/2015 JWV	Search on line for flights to/from Denver, CO for motions hearing ; draft itinerary.	0.30
02/06/2015 JWV	Reserve flights and hotel for motions hearing; finalize itinerary.	0.30
02/06/2015 JWV	Draft memorandum to Brian Platt re: [REDACTED]	0.10
02/11/2015 PRZ	Draft memorandum to Brian Platt re: [REDACTED]	0.10

BTP Arms			Page	2
		[REDACTED]		
02/25/2015	JVW	Draft correspondence to Brian Platt [REDACTED] [REDACTED]	0.10	
03/02/2015	PRZ	Receipt and review of Plaintiffs' Response to the United States' Notice of Intervention and Memorandum	0.10	
03/02/2015	PRZ	Receipt and review of Plaintiffs' Motion for Entry of Default Against Defendant Gold Strike E Commerce, LLC d-b-a Bulletproofbody ArmorHQ.com	0.10	
03/09/2015	PRZ	Draft memorandum to Andrew Lothson re [REDACTED] [REDACTED]	0.10	
03/11/2015	JVW	Gather documents fro Motions hearing (Platts Motion to Dismiss, plaintiffs Opposition, Platts Reply, Lucky Gunner's Motion to Dismiss, Sportsman Guides Motion to Dismiss, US Memorandum, plaintiffs' Reply to US Memorandum, and Amended Complaint; draft index.	0.90	
03/11/2015	PRZ	Draft memorandum to JVW regarding [REDACTED] [REDACTED]	0.10	
03/12/2015	PRZ	Preparation for and participation in lengthy telephone conference with defense counsel [REDACTED] [REDACTED]	0.80	
03/12/2015	PRZ	Draft memorandum to Mr. Montoya regarding [REDACTED] [REDACTED]	0.20	
03/13/2015	JVW	Download and gather cases for use at Motions hearing; draft index of cases.	1.00	
03/16/2015	PRZ	Preparation for hearing on Motion to Dismiss; review of Memorandum supporting Motion to Dismiss and Reply Memorandum; review of opposition, Amended Complaint and summary of Amended Complaint; prepare argument notes; travel to Denver, Colo.	5.60	
03/16/2015	PRZ	Meeting with Mr. Montoya [REDACTED] [REDACTED] [REDACTED] [REDACTED]	2.00	
03/16/2015	PRZ	Appearance before U.S.D.C. for District of Colorado	6.30	

BTP Arms

Page 3

		to present argument on Motion to Dismiss; post-argument conference with Mr. Montoya regarding potential outcome; return travel	
03/16/2015	PRZ	Draft memorandum to Brian Platt re: [REDACTED] [REDACTED]	0.30
03/27/2015	PRZ	Draft memorandum to client regarding [REDACTED] [REDACTED]	0.10
04/03/2015	PRZ	Lengthy telephone conference with counsel for Lucky Gunner regarding [REDACTED] [REDACTED]	0.40
04/03/2015	PRZ	Draft memorandum to client regarding [REDACTED] [REDACTED]	0.30
04/07/2015	PRZ	Draft memorandum to Bruce Montoya re: [REDACTED] [REDACTED]	0.10
04/07/2015	PRZ	Review of Colorado attorneys fee statute; review of 10th Circuit decisions, Rule 54 and Local Rule 54.3	0.50
04/07/2015	PRZ	Telephone conference with client regarding [REDACTED] [REDACTED]; draft memorandum to Mr. Montoya regarding [REDACTED]	0.40
04/07/2015	PRZ	Begin draft motion for attorneys' fees	1.30
04/09/2015	JVW	Final review and revisions to Affidavit in Support of Motion for Attorneys fees.	0.70
04/09/2015	JVW	Draft memorandum to Bruce Montoya's office re: [REDACTED]	0.10
04/09/2015	PRZ	Receipt of memorandum from Katherine Whitney re: [REDACTED] [REDACTED]	0.20
04/09/2015	PRZ	Complete draft of Motion for Attorneys' Fees; revisions to same	0.50
04/09/2015	PRZ	Draft and revisions to Affidavit supporting Motion for Attorneys' Fees	1.00
04/09/2015	PRZ	Draft memorandum to Katherine Whitney regarding [REDACTED]	0.20

BTP Arms			Page	4
04/09/2015	PRZ	Further revisions to Affidavit; draft memorandum to Ms. Whitney	0.30	
04/10/2015	JVW	Final review and revisions to Affidavit, Motion for Attorneys' Fees; draft proposed Order.	0.80	
04/10/2015	JVW	Draft memorandum to Bruce Montoya's office re: [REDACTED]	0.10	
04/10/2015	PRZ	Draft memorandum to Mr. Montoya and Ms. Whitney regarding [REDACTED]	0.20	
				<u>Amount</u>
		For professional services rendered	26.20	\$7,090.00

DISBURSEMENTS

02/06/2015	TR	Travel - Southwest Airline - Visa		1,056.20
02/06/2015	TR	Travel - Hyatt House - Denver		174.87
		Total disbursements		<u>\$1,231.07</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Wilde, Joan V.	0.00	0.00	\$0.00
Wilde, Joan V.	4.40	125.00	\$550.00
Zuber, Phillip R.	0.00	0.00	\$0.00
Zuber, Phillip R.	21.80	300.00	\$6,540.00

BILLING SUMMARY

Total professional services	\$7,090.00
Total disbursements	\$1,231.07
Balance due	\$8,321.07