

Dear CLIENT,

Attached are our invoices 1909, 1912, and 1925 for legal service through August.

Invoice 1909 is for \_\_\_\_\_ in the amount of \$00,000.00. In that case, we spent our time learning the facts, strategizing about the most cost-effective means to obtain the payment owed to CLIENT, preparing a complaint for foreclosure and a motion for appointment of receiver, preparing a separate complaint on the guarantees, and assisting you in the identification and selection of bankruptcy counsel in the middle district. In the next month, you can expect that our expenditure of time on this matter will decrease as the bankruptcy case transitions to \_\_\_\_\_ (where we will continue to play only an advisory role), and the guarantor defendants take time to respond to the complaint once summonses are issued and served.

Invoice 1912 is for the \_\_\_\_\_ matter in the amount of \$0,000.00. In that case, we continued to battle with counsel for [name] to obtain complete discovery responses before taking the deposition of the principal, and then taking the deposition of OTHER SIDE. Once we obtain these documents and take these two depositions, we will be ready to move forward with a motion for summary judgment (and if not successful there, with trial).

Invoice 1925 is for \_\_\_\_\_ in the amount of \$00,000.00. In that case, we are playing two roles: (1) we are prosecuting the claim against OTHER SIDE for slander of title; and (2) we are monitoring and overseeing \_\_\_\_\_ defense of OTHER SIDE's case against CLIENT. There is obvious overlap between the two cases because defeating OTHER SIDE's claim against CLIENT naturally goes a long way (but not all the way) to proving CLIENT's claim against OTHER SIDE.

In August, we spent time addressing the bond issue (pulling together information supportive of our bond demand and assisting co-counsel in preparing for a hearing on that matter, and ultimately negotiating a resolution of the bond issue at \$000,000.00 cash held in \_\_\_\_\_ trust account). In addition we continued to monitor and coordinate with you and \_\_\_\_\_ office concerning CLIENT's responses to written discovery, OTHER SIDE's responses to our discovery, and finally setting a hearing on our motion to dismiss and as opposed to merely filing an answer incorporating the arguments of the motion to dismiss to move the case forward.

We expect that the invoice for September will be substantially lower, as we are reaching the conclusion of discovery, which typically triggers a brief lull before the parties move for summary judgment and prepare for the hearing on same. If the summary judgment is denied, we will need to spend appropriate resources to be adequately prepared for trial.

As always, if you have any questions, I am available to discuss. Otherwise, please arrange for prompt payment.

Thanks,

Michael D. Ehrenstein Trial Attorney

[Mike@ehrensteinsager.com](mailto:Mike@ehrensteinsager.com)