

LAW OFFICE OF STANLEY J. SILVERSTONE

10 Esquire Road, Suite 12
New City, NY 10956

PHONE: (845) 215-9522 FAX: (845) 215-0131 sjs@sjsilverstone.com www.sjsilverstone.com

INVOICE

INVOICE NUMBER: 47
INVOICE DATE: APRIL 24, 2018

Dr. Nicole Williams
[REDACTED]

Poughkeepsie City School District Matters

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
		SERVICES			
MAR-01-18	Silverstone	Telephone calls with client regarding donation issues raised by Poughkeepsie Journal; review documents regarding Rosa Parks and MLK donations; prepare responses to Poughkeepsie Journal.	1.50	\$300.00	\$450.00
MAR-07-18	Of Counsel	Telephone call with client regarding graduation investigation and preparation for Tario meeting.	1.00	\$300.00	\$300.00
MAR-07-18	Silverstone	Telephone call with client to prepare for Tario meeting (1.0 hour - no charge).	0.00	\$300.00	\$0.00
MAR-08-18	Silverstone	Attendance at meeting with NYSED investigators regarding graduation investigation. (Meeting time - 3.0 hrs. Travel time - 3.0 hrs no charge.)	3.00	\$300.00	\$900.00
MAR-18-18	Of Counsel	Telephone call with client regarding Board resolution to file suit against client.	0.50	\$300.00	\$150.00
MAR-19-18	Of Counsel	Draft statement regarding Board resolution to file suit against client.	0.50	\$300.00	\$150.00
MAR-19-18	Silverstone	Review of Ten Dyke emails resulting from Mar. 19 meeting and prepare response.	0.30	\$300.00	\$90.00
MAR-23-18	Of Counsel	Draft letter to City Council.	0.75	\$300.00	\$225.00
MAR-23-18	Silverstone	Review Board Policy 5110-R regarding transfer procedures, discuss same with client, and prepare response to Ten Dyke regarding school transfer request.	0.30	\$300.00	\$90.00
MAR-24-18	Silverstone	Telephone call with Beth Sims regarding litigation options in response to Board lawsuit.	0.50	\$300.00	\$150.00
MAR-27-18	Of Counsel	Telephone call with SJS and Beth Sims regarding litigation options in response to Board lawsuit.	1.25	\$300.00	\$375.00
MAR-27-18	Silverstone	Telephone call with MS and Beth Sims regarding litigation options in response to Board lawsuit. (1.0 hour - no charge)	0.00	\$300.00	\$0.00
MAR-28-18	Of Counsel	Draft response regarding AIS.	1.50	\$300.00	\$450.00
MAR-29-18	Of Counsel	Review and revise Article 78 petition seeking to nullify Board resolution authorizing litigation.	1.00	\$300.00	\$300.00

INVOICE NUMBER: 47

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
MAR-30-18	Silverstone	Review of Ten Dyke emails; telephone call with client regarding proposed Article 78 proceeding to challenge board resolution authorizing litigation, and regarding Ten Dyke emails.	0.50	\$300.00	\$150.00
MAR-31-18	Silverstone	Prepare response to Ten Dyke email regarding use of PLATO.	0.25	\$300.00	\$75.00
		EXPENSES			
		No expenses for this billing period.			
		SUMMARY			
		Total amount of services			\$3,855.00
		Total amount of expenses			\$0.00
		Total hours for this invoice	12.85		
		Total amount of this invoice			\$3,855.00

ACCOUNT INFORMATION

Prior account balance as of MAR-19-2018	\$7,979.29
Payment APR-16-2018 - Check	(\$5,000.00)
Invoice 47 APR-24-2018	\$3,855.00
Payment APR-25-2018 - Check 2622	(\$5,000.00)
Current account balance	\$1,834.29

AMOUNT DUE: \$1,834.29

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INVOICE

INVOICE NUMBER: 49

INVOICE DATE: MAY 14, 2018

Dr. Nicole Williams


Poughkeepsie City School District Matters - General

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
		SERVICES			
APR-04-18	Silverstone	Telephone call with client regarding PMS child abuse investigation; telephone calls with SAANYS attorney Wendy DeForge regarding PMS investigation; review and revise response to Ten Dyke's Apr. 4 email.	0.40	\$300.00	\$120.00
APR-08-18	Of Counsel	Telephone call with client regarding PMS incident involving allegation of child abuse; draft statement.	1.00	\$300.00	\$300.00
APR-08-18	Silverstone	Review of videos of Apr. 3 PMS incident involving principal (0.2); research regarding Child Abuse in an Educational Setting Law (0.5); telephone call with client regarding PMS incident involving possible allegation of child abuse (0.7).	1.40	\$300.00	\$420.00
APR-11-18	Of Counsel	Telephone call with client regarding PMS incident involving allegation of child abuse; draft statement.	0.75	\$300.00	\$225.00
APR-12-18	Of Counsel	Review and revise Memorandum of Law in support of Art. 78 petition to invalidate board resolution authorizing litigation against client; legal research regarding same.	0.75	\$300.00	\$225.00
APR-13-18	Silverstone	Review and revise report regarding PMS alleged child abuse incident.	0.40	\$300.00	\$120.00
APR-16-18	Silverstone	Review of Watson's email dated April 16, requesting clarification regarding client's April 13 "reasonable suspicion" memorandum; telephone call with client regarding same; prepare response to Watson.	0.50	\$300.00	\$150.00
APR-18-18	Silverstone	Telephone call with client regarding questions from Board and SAANYS counsel regarding end of investigation of PMS incident; prepare response to SAANYS counsel regarding "no reasonable suspicion" determination made in PMS incident; prepare response to Watson regarding plan to reinstate PMS Principal; prepare press release regarding "no reasonable suspicion" determination.	0.50	\$300.00	\$150.00

INVOICE NUMBER: 49

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
APR-30-18	Silverstone	Receipt and review of Phee Simpson's Notice of Claim; prepare email to Anne Finney regarding Simpson Notice of Claim, and providing summary of the litigation cases pending between client and Board.	0.40	\$300.00	\$120.00
		EXPENSES			
		No expenses for this billing period.			
		SUMMARY			
		Total amount of services			\$1,830.00
		Total amount of expenses			\$0.00
		Total hours for this invoice	6.10		
		Total amount of this invoice			\$1,830.00

ACCOUNT INFORMATION

Prior account balance as of APR-24-2018	\$6,834.29
Payment APR-25-2018 - Check 2622	(\$5,000.00)
Invoice 49 MAY-14-2018	\$1,830.00
Current account balance	\$3,664.29

AMOUNT DUE: \$3,664.29

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INVOICEINVOICE NUMBER: 53
INVOICE DATE: JULY 09, 2018Dr. Nicole Williams


Poughkeepsie City School District Matters - General

DATE	PROJECT	DESCRIPTION	HOURS	RATE	AMOUNT
SERVICES					
MAY-14-18	Silverstone	Receipt and review of Haun petition and prepare statement in response to send to Poughkeepsie Journal, Finney, Wilkins, Schwartz, and DiNapoli.	0.30	\$300.00	\$90.00
MAY-21-18	Of Counsel	Meeting with client and S. Silverstone.	1.25	\$300.00	\$375.00
MAY-21-18	Silverstone	Meeting with client and M. Starvaggi.	1.25	\$300.00	\$375.00
MAY-22-18	Of Counsel	Review and revise memorandum of law in opposition to Board's motion to dismiss Article 78 proceeding to invalidate Board resolution authorizing litigation.	2.00	\$300.00	\$600.00
JUN-13-18	Silverstone	Review of memo responding to Board directives regarding administrator vacancies. (0.3 - No charge).	0.00	\$300.00	\$0.00
EXPENSES					
MAY-12-18	Silverstone	Court reporter late cancellation fee for 4/19.			\$175.00
SUMMARY					
		Total amount of services			\$1,440.00
		Total amount of expenses			\$175.00
		Total hours for this invoice	4.80		
		Total amount of this invoice			\$1,615.00

ACCOUNT INFORMATION

Prior account balance as of MAY-14-2018	\$3,664.29
Invoice 53 JUL-09-2018	\$1,615.00
Current account balance	\$5,279.29

AMOUNT DUE: \$5,279.29

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INVOICE

INVOICE NUMBER: 48
INVOICE DATE: APRIL 24, 2018

Dr. Nicole Williams
Poughkeepsie City School District
11 College Avenue
Poughkeepsie, NY 12603

Art. 78 Proceeding Against Board (Resolution 18-0389)

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
	SERVICES			
MAR-18-18	Review of board resolution authorizing lawsuit against client.	0.10	\$300.00	\$30.00
MAR-23-18	Attend board meeting for vote on board resolution authorizing lawsuit against client. (Meeting time: 2.5 hrs. / Travel time: 2.5 hrs, no charge).	2.50	\$300.00	\$750.00
MAR-27-18	Telephone call with client regarding Art. 78 strategy to challenge board resolution authorizing lawsuit against client.	0.40	\$300.00	\$120.00
MAR-28-18	Research regarding notice of claim requirements for Art. 78 proceeding.	0.75	\$300.00	\$225.00
MAR-28-18	Research regarding due process claims for Art. 78 proceeding.	2.10	\$300.00	\$630.00
MAR-29-18	Draft Notice of Petition.	0.30	\$300.00	\$90.00
MAR-29-18	Draft petition for Art. 78 proceeding.	2.50	\$300.00	\$750.00
APR-05-18	Receipt and review of Board's complaint against client and revise Art. 78 Petition to include allegations regarding same.	0.50	\$300.00	\$150.00
APR-12-18	Draft memorandum of law in support of Art. 78 petition.	2.75	\$300.00	\$825.00
APR-20-18	Prepare Request for Judicial Intervention for Art. 78 proceeding.	0.50	\$300.00	\$150.00
APR-21-18	File Art. 78 proceeding.	0.50	\$300.00	\$150.00
	EXPENSES			
APR-21-18	Filing fee for Art. 78 Proceeding.			\$210.00
APR-21-18	Filing fee for Request for Judicial Intervention.			\$95.00
	SUMMARY			
	Total amount of services			\$3,870.00
	Total amount of expenses			\$305.00
	Total hours for this invoice	12.90		
	Total amount of this invoice			\$4,175.00

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New City, NY 10956****PHONE: (845) 215-9522 FAX: (845) 215-0131 sjs@sjsilverstone.com www.sjsilverstone.com****INVOICE**INVOICE NUMBER: 50
INVOICE DATE: MAY 16, 2018Dr. Nicole Williams
Poughkeepsie City School District
11 College Avenue
Poughkeepsie, NY 12603

Art. 78 Proceeding Against Board (Resolution 18-0389)

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
	SERVICES			
APR-30-18	Telephone call and email to process server to provide instructions on service of Art. 78 papers. (0.5 - no charge)	0.00	\$300.00	\$0.00
	EXPENSES			
MAY-03-18	Service of Art. 78 papers by Process Server.			\$375.00
MAY-03-18	Photocopying of Art. 78 papers for service (410 pages X 0.20).			\$82.00
	SUMMARY			
	Total amount of services			\$0.00
	Total amount of expenses			\$457.00
	Total amount of this invoice			\$457.00

ACCOUNT INFORMATION

Prior account balance as of APR-24-2018	\$4,175.00
Invoice 50 MAY-16-2018	\$457.00
Current account balance	\$4,632.00

AMOUNT DUE: \$4,632.00

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New City, NY 10956****PHONE: (845) 215-9522 FAX: (845) 215-0131 sjs@sjsilverstone.com www.sjsilverstone.com****INVOICE**INVOICE NUMBER: 51
INVOICE DATE: MAY 27, 2018Dr. Nicole Williams
Poughkeepsie City School District
11 College Avenue
Poughkeepsie, NY 12603

Art. 78 Proceeding Against Board (Resolution 18-0389)

DATE	DESCRIPTION	HOURS	RATE	AMOUNT
	SERVICES			
MAY-16-18	Receipt and review of Board's motion to dismiss, and commence research regarding cases cited by Board.	1.20	\$300.00	\$360.00
MAY-18-18	Preparation of Memorandum of Law in Opposition to the Board's Motion to Dismiss.	1.25	\$300.00	\$375.00
MAY-20-18	Continue preparation of Memorandum of Law in Opposition to Board's Motion to Dismiss.	2.40	\$300.00	\$720.00
MAY-22-18	Revise and finalize memorandum in opposition to motion to dismiss, and file same.	1.00	\$300.00	\$300.00
	EXPENSES			
MAY-24-18	Photocopying of petition and motion papers for Judge's copy.			\$20.42
MAY-24-18	Fed ex petition and motion papers to Judge.			\$9.24
MAY-24-18	Binding of petition for Judge's copy.			\$5.95
	SUMMARY			
	Total amount of services			\$1,755.00
	Total amount of expenses			\$35.61
	Total hours for this invoice	5.85		
	Total amount of this invoice			\$1,790.61

ACCOUNT INFORMATION

Prior account balance as of MAY-16-2018	\$4,632.00
Invoice 51 MAY-27-2018	\$1,790.61
Current account balance	\$6,422.61

AMOUNT DUE: \$6,422.61

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July 9, 2018

Dr. Nicole Williams
209 Rutland Road
Brooklyn, N.Y. 11225

Re: Board of Education v. Dr. Nicole Williams
Lawsuit to Invalidate Employment Contract

FOR PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION	HOURS/RATE	AMOUNT
4/23/18	Prepare Answer to Board's allegations.	1.8 / \$300	\$540.00
4/24/18	Research regarding laches affirmative defense.	0.4 / \$300	\$120.00
4/24/18	Prepare laches affirmative defense.	0.4 / \$300	\$120.00
4/30/18	Prepare affirmative defenses.	1.0 / \$300	\$300.00
4/30/18	Prepare counterclaim.	3.5 / \$300	CONTING
5/2/18	Prepare document request.	0.1 / \$300	\$30.00
5/2/18	Prepare document request.	0.2 / \$300	CONTING
5/3/18	Telephone call with client regarding draft answer.	0.3 / \$300	\$90.00
5/3/18	Telephone call with client regarding counterclaim.	0.4 / \$300	CONTING
5/3/18	Revise paragraphs 14 and 18 of the Answer; prepare document demands, prepare notices of deposition.	1.1 / \$300	\$330.00
5/3/18	Prepare document demands; prepare Notices of deposition.	1.1 / \$300	CONTING

5/4/18	Revise and finalize Answer pursuant to client comments; review and revise document requests.	0.4 / \$300	\$120.00
5/4/18	Revise and finalize Counterclaim; review and revise document requests.	0.5 / \$300	CONTING
5/7/18	File Answer and Counterclaim, document demands, and notices of deposition.	0.2 / \$300	\$60.00
5/7/18	File Answer and Counterclaim, document demands, and notices of deposition.	0.3 / \$300	CONTING
5/9/18	Review of affidavits of service, and file same.	0.3 / \$300	CONTING
5/13/18	Revise and finalize summons for counterclaim, and file same.	0.2 / \$300	CONTING
5/23/18	Telephone calls with Board attorneys Howard Miller and Kate Reid regarding request to extend time to respond to summary judgment motion; review of adjournment rules of Judge McLoughlin; prepare letter to Judge McLoughlin to request extension of time.	1.4 / \$300	CONTING
6/5/18	Review of Board's memorandum of law in support of summary judgment motion.	0.5 / \$300	CONTING
6/6/18	Prepare email to Board's counsel regarding discovery.	0.2 / \$300	CONTING
6/6/18	Research cases cited by Board in summary judgment motion; prepare email to Board's counsel regarding their failure to cite relevant Commissioner's decisions.	1.3 / \$300	CONTING
6/8/18	Preparation of affidavit in opposition to summary judgment motion.	2.1 / \$300	CONTING
6/11/18	Continue preparation of affidavit in opposition to summary judgment motion.	1.2 / \$300	CONTING
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	TOTAL FEES	5.7 / \$300.00	\$1,710.00
	TOTAL AMOUNT DUE		\$1,710.00

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July 9, 2018

Dr. Nicole Williams
209 Rutland Road
Brooklyn, N.Y. 11225

Re: Board of Education v. Maryellen Elia and Dr. Nicole Williams
Article 78 Proceeding to Annul Commissioner's Dec. 22, 2017 Decision

FOR PROFESSIONAL SERVICES RENDERED

DATE	ATTY	DESCRIPTION	HOURS/RATE	AMOUNT
5/3/18	MS	Review Petition and Memo of Law; Legal research; draft Answer.	1.5 / \$300	\$450.00
5/8/18	MS	Continue drafting Answer to Petition; Draft Memo of Law in opposition; Continue legal research.	2.0 / \$300	\$600.00
5/9	MS	Continue drafting Answer and Memo of Law; continue legal research.	3.75 / \$300	\$1,125.00
5/10	SS	Review and revise draft Answer and Memo of Law.	0.7 / \$300	\$210.00
5/15	SS	Telephone call with Melissa Latino of A-G's office regarding response to Art. 78.	0.5 / \$300	\$150.00
5/22	MS	Revise Answer, affidavit, and Memo of Law.	3.5 / \$300	\$1,050.00
5/22	SS	Review and revise Answer to Petition, Affidavit in Support, and Memo of Law.	1.5 / \$300	\$450.00
5/23	SS	File Answer, Affidavit, and Memo of Law.	0.2 / \$300	\$60.00

TOTAL FEES	13.65 / \$300.00	\$4,095.00
TOTAL AMOUNT DUE		\$4,095.00

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July 9, 2018

Dr. Nicole Williams
209 Rutland Road
Brooklyn, N.Y. 11225

Re: Contingency Fee

FOR PROFESSIONAL SERVICES RENDERED

DATE	DESCRIPTION / AMOUNT
7/9/18	Contingency Fee Pursuant to Fee Agreement: Settlement obtained through direct negotiation after the filing of the Board's Motion for Summary Judgment. Percentage of fee reduced from 33% to 15%. Calculation of fee: 15% X \$433,000: \$64,950.00 Discount (50%): (\$32,475.00)
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TOTAL CONTINGENCY FEE	\$32,475.00