

STATE OF MICHIGAN
IN THE 17th CIRCUIT COURT FOR KENT COUNTY

GREAT LAKES GLOBAL AVIATION
LOGISTICS, LLC,

Plaintiff,

vs.

DAN JANSON,

Defendant.

Case No. 16-00346-CKB

HON. CHRISTOPHER P. YATES

OPINION AND ORDER DETERMINING REASONABLE ATTORNEY FEES AND
COSTS THAT DEFENDANT JANSON MUST PAY TO PLAINTIFF GREAT LAKES

On January 18, 2017, the Court issued an opinion and order granting in part, and denying in part, the motion submitted by Plaintiff Great Lakes Global Aviation Logistics, LLC (“Great Lakes”) to enforce an injunction against Defendant Dan Janson. In that opinion, the Court ruled that Great Lakes is entitled to “an award of the reasonable attorney fees” that it incurred “in seeking to enforce the injunction” against Janson. The Court held a hearing on April 26, 2017, to permit the parties to present evidence and arguments regarding the reasonableness of the attorney fees requested by Great Lakes. After considering the attorney-fee request under the three-step analysis prescribed in Smith v Khouri, 481 Mich 519, 522 (2008), and refined in Pirgu v United Services Automobile Ass’n, 499 Mich 269, 281-282 (2016), the Court shall direct Janson to pay Great Lakes \$17,557.50 in attorney fees and \$52.20 in costs for a total award of \$17,609.70.

Under Michigan law, the Court’s review of a request for reasonable attorney fees must take place in three steps. The Court “must begin its analysis by determining the reasonable hourly rate customarily charged in the locality for similar services.” Pirgu, 499 Mich at 281. The Court “must

then multiply that rate by the reasonable number of hours expended in the case to arrive at a baseline figure.” Id. Finally, the Court must consider eight separate “factors to determine whether an up or down adjustment is appropriate.” Id. Therefore, the Court must undertake this analysis to determine the “reasonable” attorney fees to which Plaintiff Great Lakes is entitled for the legal work necessary to enforce the Court’s injunction.

The hourly billing rates claimed by Plaintiff Great Lakes are as follows: (1) \$410 in 2016 and \$430 in 2017 for Varnum LLP equity partner Bryan Walters; and (2) \$280 in 2016 and \$305 in 2017 for Varnum LLP associate Matthew Anderson. Although these rates are on the high end of the hourly fees ordinarily approved by the Court, the rates fall within the range ““that lawyers of similar ability and experience in the community normally charge their paying clients for the type of work in question.”” Smith, 481 Mich at 531. Attorney Walters’s hourly rates roughly match those at the 75th percentile for equity partners, according to the 2014 State Bar of Michigan Economics of Law Practice Attorney Income and Billing Rate Summary Report, which identifies that rate as \$417 per hour.¹ In similar fashion, Attorney Anderson’s hourly rates roughly match those at the 75 percentile for senior associates, which the 2014 State Bar of Michigan identifies as \$300. Therefore, the Court finds the hourly billing rates of Great Lakes’s attorneys to be reasonable.

The Court must next turn to the number of hours billed by Plaintiff Great Lakes’s attorneys. In accordance with the directive from our Supreme Court, Great Lakes has provided the Court with “detailed billing records, which the court must examine” for reasonableness. See Smith, 481 Mich

¹ Our Supreme Court has emphasized the importance of such objective surveys conducted by the State Bar of Michigan, see Smith, 481 Mich at 532, and Plaintiff Great Lakes has attached the most recent survey from the State Bar of Michigan as Exhibit 2 to the brief in support of its request for attorney fees. Each of the hourly rates cited by the Court comes from Table 3 on page 4 of that survey.

at 532. In conducting its examination, the Court must “exclude ‘excessive, redundant or otherwise unnecessary’ hours” billed by Great Lakes’s attorneys. *Id.* at 532 n17. The Court issued the initial version of the injunction on January 22, 2016, so Great Lakes did not begin looking into Defendant Janson’s compliance with the injunction until after that date.² From that point forward, Great Lakes paid Attorney Walters for 8.25 hours of work in 2016 and an additional 3.75 hours in 2017.³ Those billed hours yield total billing by Attorney Walters of \$3,382.50, *i.e.*, 8.25 hours times \$410 per hour, for 2016 and \$1,612.50, *i.e.*, 3.75 hours times \$430 per hour, for 2017, which results in total billing on the case of \$4,995 by Attorney Walters. Great Lakes paid Attorney Anderson for 28.2 hours of work in 2016 and an additional 15.3 hours in 2017.⁴ Attorney Anderson’s billed hours result in total billing of \$7,896, *i.e.*, 28.2 hours times \$280 per hour, for 2016 and \$4,666.50, *i.e.*, 15.3 hours times \$305 per hour, for 2017, which yields total billing on the case of \$12,562.50 for Attorney Anderson. Adding up the billings for the two attorneys who represented Great Lakes in its effort to enforce the injunction against Janson results in a total attorney fee of \$17,557.50, *i.e.*, \$4,995 plus \$12,562.50, which the Court deems reasonable.

² Defendant Janson insists that no attorney fees were reasonably incurred on issues regarding compliance until after the Court entered the parties’ revised version of the preliminary injunction on April 27, 2016. The Court disagrees. As the Court’s opinion of January 18, 2017, explains, Janson made improper contacts with customers of Defendant Great Lakes both before and after the revised version of the injunction was issued. Thus, the Court concludes that Great Lakes acted well within its rights by engaging its attorneys to review Janson’s compliance prior to April 27, 2016.

³ Each of Attorney Walters’s billing entries is identified with yellow highlighting on Exhibit A attached to this opinion. Significantly, Attorney Walters chose not to bill Plaintiff Great Lakes for an additional 4.25 hours of work performed in 2016 and one hour of work performed in 2017. Each of those billing entries refers to “Client Courtesy” to explain the absence of charges.

⁴ Each of Attorney Anderson’s billing entries is indicated in pink highlighting on Exhibit A attached to this opinion. Attorney Anderson had only one unbilled entry on October 26, 2016, for one-quarter of an hour, which he described as “no charge, client courtesy[.]”

Having conducted the computations necessary at the first two steps to arrive at the “baseline figure[.]” see Pirgu, 499 Mich at 281, the Court must consider whether to make any adjustments to that baseline figure of \$17,557.50 in attorney fees. On balance, the Court finds no reason to make any adjustments to the baseline figure. First, the “experience, reputation, and ability of the lawyer or lawyers” for Plaintiff Great Lakes has already been factored into the relatively high billing rates that the Court has approved. See Pirgu, 499 Mich at 282. Second, “the difficulty of the case” does not warrant an upward adjustment because enforcement of the injunction was a straightforward legal project. See id. Third, although the “results obtained” could support a downward adjustment based upon Defendant Janson’s success on some of the arguments advanced by Great Lakes, see id., “the expenses incurred” could support an upward adjustment because Great Lakes paid nearly \$2,000 to Complete Investigations, LLC, for its investigative work. See Plaintiff’s Supplemental Exhibits in Support of Attorney Fee Award, Exhibit 5. In sum, the Court finds that the third and fourth factors identified by our Supreme Court in Pirgu, 499 Mich at 282, offset each other in this case. Next, even Great Lakes admits that nothing about this case merits an adjustment under the fifth, sixth, seventh, or eighth factor identified in Pirgu, 499 Mich at 282, and the Court agrees. Great Lakes paid by the hour for its representation, its attorneys did not have a long-standing relationship with Great Lakes, its attorneys did not have to turn down other work in order to represent Great Lakes, and the legal work on this case was not performed under any “time limitations.” See Pirgu, 499 Mich at 282. As a result, the Court concludes that the “reasonable” attorney fee in this case is \$17,557.50.

Plaintiff Great Lakes has also asked to recover its court costs of \$52.20. According to MCR 2.625(A)(1), court costs “will be allowed to the prevailing party in an action.” The “taxation of costs is neither a reward granted to the prevailing party not a punishment imposed on the losing party, but

rather a component of the burden of litigation presumed to be known by the affected party.” Mason v City of Menominee, 282 Mich App 525, 530 (2009). Consequently, the Court “is not required to justify awarding costs to a prevailing party; rather, the court must justify the failure to award costs.” Blue Cross and Blue Shield of Michigan v Eaton Rapids Community Hospital, 221 Mich App 301, 308 (1997). Here, Great Lakes must be characterized as a “prevailing party” because of its success in enforcing the injunction against Defendant Janson. Although there were several components to that endeavor and Great Lakes did not prevail on every issue, “the party prevailing on each issue or count may be allowed costs for that issue or count.” See MCR 2.625(B)(2). Our Court of Appeals has explained that, “in order to be considered a prevailing party, that party must show, at the very least, that its position was improved by the litigation.” Angott v Chubb Group Ins, 270 Mich App 465, 489 (2006). Clearly, on at least one of its theories, Great Lakes was the “prevailing party,” so the Court shall award Great Lakes its modest costs of \$52.20 as well as its reasonable attorney fees of \$17,557.50 for a grand total of \$17,609.70. The Court invites Great Lakes to submit a proposed judgment reflecting that award under the so-called seven-day rule. See MCR 2.602(B)(3).

IT IS SO ORDERED.

Dated: June 15, 2017



HON. CHRISTOPHER P. YATES (P41017)
Kent County Circuit Court Judge

Exhibit A: Varnum LLP Billing Sheets



BRIDGEWATER PLACE • POST OFFICE BOX 352
GRAND RAPIDS, MICHIGAN 49501-0352

EDN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 967944
Invoice Date: March 7, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
(REDACTED)			
02/04/16	E-mails to/from Jeff Krisel re ongoing concerns re Janson compliance with Injunction. Bryan R. Walters	0.25	102.50
02/09/16	Telephone conference with Jeff Krisel re potential violations of injunctive order by Janson. Bryan R. Walters	0.25	102.50
02/12/16	E-mails to/from Jeff Krisel re documentary support for claim that Janson is still taking orders from ATB. Bryan R. Walters	0.25	102.50

(REDACTED)

Walters 0.75
Anderson Q

March 7, 2016
Invoice No. 967944
Matter No. 343360
Page 2

(REDACTED)

(REDACTED)

02/20/16	E-mail from Mr. Krisel; discuss same with Attorney Walters re availability to meet early next week to discuss enforcement of injunction. Matthew T. Anderson	0.20	57.00
02/22/16	Review private investigator report and materials re Janson matter. Office conference with Matt Anderson re same. Bryan R. Walters	0.25	102.50
02/22/16	Office conference re possible strategies re enforcement of injunction, re motion to dismiss. Matthew T. Anderson	0.80	228.00
02/23/16	Meeting with Jeff Krisel and Mat Anderson at client location re strategy for defending counterclaim and potential Motion for Sanctions against Janson, including agreement to delay action on deposition of Janson on Motion for Sanction for the time being. (No Charge Client Courtesy 1.5 hours) Bryan R. Walters	0.00	0.00
02/23/16	Prepare for, drive to/from and attend meeting with Mr. Krisel to discuss strategy for Motion to Dismiss Defendant's Counterclaim and strategy for enforcement of injunction, review Defendant's sales commission reports. Matthew T. Anderson	1.70	484.50

Walters 0.25

Anderson 2.7



March 7, 2016
Invoice No. 967944
Matter No. 343360
Page 3

02/26/16	Call from Mr. Krisel re confirming receipt of documents and scheduling possible time to meet in person re strategy. Matthew T. Anderson	0.10	28.50
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TOTAL FEES FOR SERVICES

(REDACTED)

DISBURSEMENTS:

(REDACTED)

TOTAL THIS INVOICE

(REDACTED)

TOTAL PAYMENT DUE

(REDACTED)

Walter O
Anderson O.1



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GRAND RAPIDS, MICHIGAN 49501-0352

EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 973681
Invoice Date: May 11, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
	(REDACTED)		
04/06/16	E-mail from Mr. Krisel re possible deal between Dan Janson and SR Technics. Matthew T. Anderson	0.10	28.50

(REDACTED)

(REDACTED)

(RADACTED)

Walters \$
Anderson 0.1



May 11, 2016
Invoice No. 973681
Matter No. 343360
Page 2

(REDACTED)

(REDACTED)

TOTAL FEES FOR SERVICES

— (REDACTED)

TOTAL THIS INVOICE

(REDACTED)

TOTAL PAYMENT DUE

(REDACTED)



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EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 978383
Invoice Date: July 12, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
05/09/16	E-mails to/from Jeff Krisel re potential proof of additional sales efforts to ATB by Janson. Bryan R. Walters	0.25	102.50
06/06/16	Review e-mail chain from Mr. Krisel re Defendant's attempted sale to GLG customer; call Mr. Krisel re same; office conference re same. Matthew T. Anderson	0.50	142.50
06/07/16	Call Mr. Krisel re strategy to take Defendant's deposition and possibly request a production of documents. Matthew T. Anderson	0.10	28.50
06/20/16	Telephone call with Mr. Krisel re strategy to enforce injunction against Defendant. Matthew T. Anderson	0.30	85.50
06/27/16	Office conference with Matt Anderson re potential additional violations of injunction and strategy re same. (No Charge Client Courtesy .25 hours) Bryan R. Walters	0.00	0.00

TOTAL FEES FOR SERVICES

\$359.00

Walters 0.25
Anderson 0.9



July 12, 2016
Invoice No. 978383
Matter No. 343360
Page 2

TOTAL THIS INVOICE

\$359.00

TOTAL PAYMENT DUE

\$359.00



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EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 981088
Invoice Date: August 11, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
(REDACTED)			
07/15/16	Review video from investigator of Dan Janson. Telephone conference with investigator - left message. Bryan R. Walters	0.25	102.50
07/28/16	Office conference with Matt Anderson re discovery deadlines and key strategy. (No Charge Client Courtesy .25 hours) Bryan R. Walters	0.00	0.00
07/28/16	Office conference re upcoming discovery cutoff, possible discovery strategy. Matthew T. Anderson	0.10	28.50

TOTAL FEES FOR SERVICES

(REDACTED)

Walters 0.25
Anderson 0.1



August 11, 2016
Invoice No. 981088
Matter No. 343360
Page 2

TOTAL THIS INVOICE

(REDACTED)

TOTAL PAYMENT DUE

(REDACTED)



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EDN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 983150
Invoice Date: September 12, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
08/10/16	Review past responses by Defendant to determine whether further written discovery needed regarding his contacts with prohibited parties. Matthew T. Anderson	0.40	114.00
08/11/16	Call Mr. Krisel re whether to pursue written discovery against Defendant. Matthew T. Anderson	0.30	85.50
08/14/16	Prepare discovery requests to Defendant. Matthew T. Anderson	0.60	171.00
08/15/16	Continue to prepare discovery to Defendant. Matthew T. Anderson	0.70	199.50
08/16/16	Revise discovery requests to Defendant; review surveillance video. Matthew T. Anderson	1.80	513.00
08/17/16	Review and revise draft discovery requests. Office conference with Matt Anderson re same. Bryan R. Walters	0.25	102.50

Walters 0.25
Anderson 3.8

September 12, 2016
Invoice No. 983150
Matter No. 343360
Page 2

08/18/16	Revise discovery requests and e-mail and call with Mr. Krisel re same. Matthew T. Anderson	0.30	85.50
08/29/16	Voicemail from, e-mail to Mr. Krisel re update on status of discovery to Defendant. Matthew T. Anderson	0.10	28.50

TOTAL FEES FOR SERVICES	\$1,299.50
TOTAL THIS INVOICE	\$1,299.50
TOTAL PAYMENT DUE	\$1,299.50

Walker &
Anderson 0.4



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GRAND RAPIDS, MICHIGAN 49501-0352

EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 985646
Invoice Date: October 11, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
09/22/16	Office conference with Matt Anderson re deposition and discovery issues. (No Charge Client Courtesy .25 hours) Bryan R. Walters	0.00	0.00
09/22/16	Call and e-mail opposing counsel to inquire about responses to discovery requests and to ensure Defendant's deposition, if necessary, can occur after September 30; call with Mr. Krisel to update him re same. Matthew T. Anderson	0.40	114.00
09/27/16	E-mail Mr. Krisel re documents received from Defendant; review documents received from Defendant. Matthew T. Anderson	1.60	456.00
09/28/16	Office conference with Matt Anderson re supplemental discovery responses by Janson. Review e-mail from Matt Anderson re same (0.25 hours, no charge, client courtesy). Bryan R. Walters	0.00	0.00

Walters 2
Anderson 2.0

October 11, 2016
Invoice No. 985646
Matter No. 343360
Page 2

09/28/16	E-mail from Mr. Krisel re his observations re documents produced by Defendant; call with Mr. Krisel re same; office conference re strategy to enforce injunction. Matthew T. Anderson	0.90	256.50
09/29/16	E-mails to/from Jeff Krisel re Motion for Violation of Injunction and discovery issues. Bryan R. Walters	0.25	102.50
09/29/16	E-mails from/to Mr. Krisel re further evidence of Janson's dealing with ATB, and re strategy and timing of motion to enforce and extend injunction; review video re mention of Austrian Airlines. Matthew T. Anderson	0.50	142.50

TOTAL FEES FOR SERVICES	\$1,071.50
TOTAL THIS INVOICE	\$1,071.50
TOTAL PAYMENT DUE	\$1,071.50

Walters 0.25
Anderson 1.4



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GRAND RAPIDS, MICHIGAN 49501-0352

EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 988337
Invoice Date: November 14, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
10/06/16	Review of e-mail from Jeff Krisel re sales numbers in 2016 versus 2015. (No Charge Client Courtesy .25 hours) Bryan R. Walters	0.00	0.00
10/07/16	Review e-mail from Jeff Krisel re additional ATB sales. (No Charge Client Courtesy .25 hours) Bryan R. Walters	0.00	0.00
10/18/16	Prepare Motion to Enforce Injunction. Matthew T. Anderson	0.70	199.50
10/19/16	Continue to prepare Motion to Enforce Injunction. Matthew T. Anderson	1.00	285.00
10/21/16	Continue to prepare, revise Motion to Enforce Injunction. Matthew T. Anderson	3.50	997.50
10/23/16	Review draft of motions to enforce injunction and for sanctions for violation of injunction (no charge, client courtesy, 0.5 hours) Bryan R. Walters	0.00	0.00

Walters Q

Anderson 5.2

November 14, 2016
Invoice No. 988337
Matter No. 343360
Page 2

10/24/16	Additional review of draft Brief re Violation of Injunction. Review e-mail from Jeff Krisel re same (no charge, client courtesy, 0.25 hours) Bryan R. Walters	0.00	0.00
10/25/16	Review and revise draft brief re violation of injunction. Telephone conference with Matt Anderson re same. Bryan R. Walters	1.00	410.00
10/25/16	Office conference re revisions to Motion to Enforce Injunction; research re Austrian Airlines structure. Matthew T. Anderson	1.00	285.00
10/26/16	E-mail Jeff Krisel re phone call to prepare affidavit to accompany Motion to Enforce Injunction (no charge, client courtesy, 0.25 hours) Matthew T. Anderson	0.00	0.00
10/27/16	Call Mr. Krisel re additional facts for Motion to Enforce Injunction; possible need for affidavit; office conference re same; review surveillance video to select section for transcription. Matthew T. Anderson	0.80	228.00
10/28/16	Prepare affidavits for investigator and for Mr. Krisel; office conference re same; review investigator video to ensure proper information included in affidavit re identifying Janson. Matthew T. Anderson	1.00	285.00
10/30/16	Revise Motion to Enforce Injunction. Matthew T. Anderson	2.00	570.00
10/31/16	Review/revise Brief in Support of Motion to Enforce Injunction. Office conference with Matt Anderson re same. Additional review and revisions to brief. Bryan R. Walters	1.00	410.00

Walters 2.0
Anderson 4.8



November 14, 2016
Invoice No. 988337
Matter No. 343360
Page 3

10/31/16	Revise GLG Motion to Enforce Injunction; prepare exhibits, affidavit for filing. Matthew T. Anderson	3.00	855.00
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TOTAL FEES FOR SERVICES	\$4,525.00
TOTAL THIS INVOICE	\$4,525.00
TOTAL PAYMENT DUE	\$4,525.00

Walter J. Q
Anderson 3.0



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GRAND RAPIDS, MICHIGAN 49501-0352

EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 991093
Invoice Date: December 15, 2016

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
11/01/16	Voicemail from Mr. Krisel re actuators and review preliminary injunction, settlement agreement and dismissal re ability to pursue claim; call Court re revising motion to be an ex parte motion supported by affidavit; call opposing counsel re refiling motion to enforce injunction. Matthew T. Anderson	0.60	171.00
11/02/16	Revise Motion to Enforce Injunction to conform to Court's request to make it an ex parte motion. Matthew T. Anderson	0.50	142.50
11/03/16	Review and revise Brief in Support of Ex-parte Motion for Enforcement of Injunction and supporting motion papers. Bryan R. Walters	0.50	205.00
11/03/16	Revise Motion to Enforce Injunction to conform to Court's request to make it an ex parte motion; e-mail Mr. Krisel re revised affidavit. Matthew T. Anderson	0.50	142.50

Walters 0.5
Anderson 1.6

December 15, 2016
Invoice No. 991093
Matter No. 343360
Page 2

11/04/16	Additional revisions re Motion for Ex-parte Order and supporting Brief. Office conference with Matt Anderson re same. Review Jansen opposition brief re initial Motion for Sanctions and follow-up re same. Bryan R. Walters	0.50	205.00
11/04/16	Review Janson's Response to Motion to Enforce Injunction; revise brief in support of ex parte motion to enforce injunction; office conference re same; e-mail Mr. Krisel re Janson's Response. Matthew T. Anderson	1.20	342.00
11/30/16	E-mails to/from Court re scheduling of hearing on ex-parte motion re violation of injunction. Office conference with Matt Anderson re same. (No Charge Client Courtesy .25 hours) Bryan R. Walters	0.00	0.00
11/30/16	Call from opposing counsel re status of Ex Parte Motion for Order to Show Cause re Enforcement of Injunction. Matthew T. Anderson	0.10	28.50

TOTAL FEES FOR SERVICES

\$1,236.50

DISBURSEMENTS:

11/03/16 Messenger Fee - - VENDOR: MARK ALISTAIR COOPER

11.00

TOTAL DISBURSEMENTS

\$11.00

TOTAL THIS INVOICE

\$1,247.50

TOTAL PAYMENT DUE

\$1,247.50

Walters 0.5
Anderson 1.3



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GRAND RAPIDS, MICHIGAN 49501-0352

EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 993399
Invoice Date: January 13, 2017

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
12/11/16	E-mail to court clerk re scheduling of hearing on motion to show cause re injunction. (No Charge Client Courtesy .25 hours) Bryan R. Walters	0.00	0.00
12/19/16	Multiple e-mails and telephone conferences re scheduling of hearing on Motion to Show Cause for violation of preliminary injunction. Telephone conference with the Court re same. Bryan R. Walters	0.50	205.00
12/19/16	Call with Mr. Krisel re schedule for hearing to enforce injunction; office conference re same. Matthew T. Anderson	0.20	57.00
12/27/16	Prepare for oral argument on Motion for Order to Show Cause Regarding Injunction. Oral argument with Court. Telephone conference with Mr. Krisel re oral argument results and next steps. Draft proposed Order extending injunction through January 17 for certain companies and e-mail to opposing counsel re same. Bryan R. Walters	3.00	1,230.00

Walters 3.5
Anderson 0.2

January 13, 2017
Invoice No. 993399
Matter No. 343360
Page 2

12/28/16	Follow-up with Richard Radke and Matt Anderson re entry of order continuing injunction until January 17 for certain entities. Bryan R. Walters	0.25	102.50
12/28/16	Call opposing counsel re Proposed Order Extending Injunction. Matthew T. Anderson	0.20	57.00
12/29/16	Call to/from and e-mail opposing counsel re status of revisions to Proposed Order Extending Injunction; call Judge's chambers re same; office conference re same; review revisions from opposing counsel and file Order. Matthew T. Anderson	0.40	114.00

TOTAL FEES FOR SERVICES

\$1,765.50

DISBURSEMENTS:

10/31/16	Filing Fee - - VENDOR: BANK OF AMERICA / KENT COUNTY CIRCUIT COURT	20.60
11/04/16	Motion Fee - - VENDOR: BANK OF AMERICA / KENT COUNTY	20.60

TOTAL DISBURSEMENTS

\$41.20

TOTAL THIS INVOICE

\$1,806.70

TOTAL PAYMENT DUE

\$1,806.70

Walters 0.25
Anderson 0.6



BRIDGEWATER PLACE • POST OFFICE BOX 352
GRAND RAPIDS, MICHIGAN 49501-0352

EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 996342
Invoice Date: February 19, 2017

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
01/04/17	Office conference re preparing Supplemental Brief in Support of Enforcing Injunction. Matthew T. Anderson	0.20	61.00
01/08/17	Prepare Supplemental Brief in Support of Enforcing Injunction. Matthew T. Anderson	3.10	945.50
01/09/17	Revise Supplemental Brief in Support of Enforcing Injunction; office conference re same; coordinate filing same. Matthew T. Anderson	0.50	152.50
01/16/17	Office conference with Matt Anderson re plan for follow up with court if no opinion issued by January 17 (0.25 hours, no charge, client courtesy). Bryan R. Walters	0.00	0.00
01/17/17	Call and e-mail Court re status of opinion on Motion to Enforce Injunction; calls and e-mails with opposing counsel re same; prepare stipulated order to extend injunction additional day. Matthew T. Anderson	1.60	488.00

Walters 4
Anderson 5.4

February 19, 2017
Invoice No. 996342
Matter No. 343360
Page 2

01/18/17	Review opinion from Court granting in part and denying in part motion to enforce injunction. E-mail to Mr. Krisel re same. Bryan R. Walters	0.50	215.00
01/18/17	Review Court's Order re Motion to Enforce Injunction. Matthew T. Anderson	0.20	61.00
01/24/17	E-mails to/from court re scheduling conference on attorneys' fee hearing. Bryan R. Walters	0.25	107.50
01/31/17	Review time entries. Telephone conference with Jeff Krisel re settlement of attorneys fee issue. E-mails to/from Rick Radke re settlement of attorneys fee issue. Bryan R. Walters	0.50	215.00
01/31/17	Attention to attorneys fee issue (0.25 hours, no charge, client courtesy) Bryan R. Walters	0.00	0.00

TOTAL FEES FOR SERVICES

\$2,245.50

TOTAL THIS INVOICE

\$2,245.50

TOTAL PAYMENT DUE

\$2,245.50

Walters 1.25
Anderson 0.2



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BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 998376
Invoice Date: March 15, 2017

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
02/06/17	E-mails re potential adjournment/rescheduling of status conference on attorneys' fee issue. Bryan R. Walters	0.25	107.50
02/13/17	Review e-mails re telephonic availability for scheduling conference. Office conference with Matt Anderson re coverage of scheduling conference. Bryan R. Walters	0.25	107.50
02/15/17	Office conference re discovery requests from Defendant; Defendant's counteroffer re fees; preparing for scheduling conference. Matthew T. Anderson	0.20	61.00
02/16/17	Prepare for, travel to and attend scheduling conference re attorneys' fees evidentiary hearing; e-mail Mr. Krisel re same. Matthew T. Anderson	1.00	305.00
02/20/17	Email to J. Krisel re attorneys fee issues (.25 hours, no charge client courtesy). Bryan R. Walters	0.00	0.00

Walters 0.5
Anderson 1.2



March 15, 2017
Invoice No. 998376
Matter No. 343360
Page 2

02/21/17	Additional follow up emails re attorneys fee issues (.25 hours, no charge client courtesy). Bryan R. Walters	0.00	0.00
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TOTAL FEES FOR SERVICES	\$581.00
TOTAL THIS INVOICE	\$581.00
TOTAL PAYMENT DUE	\$581.00

Walters Q
Anderson Q



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EIN 38-1294924 • TELEPHONE 616 / 336-6000 • FAX 616 / 336-7000

BRYAN R. WALTERS

BRWALTERS@VARNUMLAW.COM

DIRECT DIAL 616/336-6865

Great Lakes Global Aviation Logistics, LLC
Jeff Krisel, President
7016 12th Avenue
Jenison, Michigan 49428

RE: DAN JANSON DEPARTURE
Matter Number: 343360
Invoice Number: 1000556
Invoice Date: April 11, 2017

LEGAL SERVICES RENDERED:

<u>Date</u>	<u>Description/Services Rendered By</u>	<u>Hours</u>	<u>Amount</u>
03/02/17	Office conference re preparing Brief in Support of Attorney Fees. Matthew T. Anderson	0.20	61.00
03/19/17	Prepare Brief in Support of Request for Attorneys' Fees. Matthew T. Anderson	4.50	1,372.50
03/20/17	Review and revise brief in support of motion for attorneys fee. Review exhibits re same. Attention to file re calculation of attorneys fee request. Multiple office conferences with M. Anderson re same. Bryan R. Walters	2.00	860.00
03/20/17	Prepare and revise Brief in Support of Attorney Fees. Prepare exhibits and coordinate filing of same. Matthew T. Anderson	3.50	1,067.50
03/21/17	Review invoices for private investigator for submission in conjunction with Brief in Support of Attorney Fees. Matthew T. Anderson	0.20	61.00

Walters 2.0

Anderson 8.4

April 11, 2017
Invoice No. 1000556
Matter No. 343360
Page 2

03/23/17	E-mail opposing counsel re private investigator invoices to be included in Attorney Fee Application. Matthew T. Anderson	0.10	30.50
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TOTAL FEES FOR SERVICES

\$3,452.50

TOTAL THIS INVOICE

\$3,452.50

TOTAL PAYMENT DUE

\$3,452.50

Walters D

Anderson O.1