



1155 Brewery Park Blvd, Ste 200
Detroit, Michigan 48207
313-446-1530
Tax I.D. 38-1879991

September 10, 2025

Invoice 650794

Charles Widmaier
Tyrone Township
123 Brighton Lake Rd., Ste. 205
Brighton, MI 48116

Re: In Re: Chris Ropeta
Claim #:

Client 8126
Matter 1

For Legal Services Rendered Through 8/31/2025

Date	Timekpr	Description of Services Performed	Hours
08/01/25	BTIGA	Prepare portion of standard of review of argument portion of written response to Ropeta's brief.	.30
08/01/25	BTIGA	Analyze part of Ropeta's brief and any potential arguments or statements made related to the political question doctrine as part of review for additional argument related on political question doctrine.	.40
08/01/25	BTIGA	Analyze cases related to the standard for a writ of superintending control and elements required for the issuance of writ as part of written arguments to the court.	.70
08/01/25	BTIGA	Analyze case law opinions discussing the political question doctrine and potentially analogous cases as part of consideration of additional arguments in response brief.	.80
08/04/25	JJG	Review and analysis of party notification from court clerk	.20
08/11/25	BTIGA	Review of certified record and emails and text messages involving Ropeta and the scheme to concoct false charges with notes and preparation of citations and quotations to be inserted into statement of facts for the court.	.70
08/11/25	BTIGA	Analyze Ropeta's brief, including his statement of facts and facts highlighted as favorable to him and arguments related to what specific official capacity was implicated by Ropeta when he held dual roles.	.80
08/11/25	BTIGA	Analyze case law opinions discussing the removal of a municipal board and whether the actions done by the removed person related to official acts or acts in another office, with notes on arguments or cases to be cited.	1.00
08/11/25	BTIGA	Analyze cases and statutes interpreting the scope of a municipal board member's office, including under the MPEA.	1.20
08/11/25	BTIGA	Prepare portions of statement of facts, detailing Roepta's scheme and the background leading up to the decision to remove him from the planning commission.	1.80
08/12/25	BTIGA	Prepare standard of review portion of argument to guide the court on the burden on Ropeta to show an entitlement to superintending control.	.20
08/12/25	BTIGA	Analyze cases related to the clear legal duty standard for superintending control for additional arguments and citations to include in argument to show the high burden and threshold for Ropeta.	.50

08/12/25	BTIGA	Analyze Ropeta's brief related to the substantial evidence standard and whether the evidence was sufficient to that standard with notes on specific items to respond to in arguments.	.50
08/12/25	BTIGA	Analyze cases related to the substantial evidence test and whether that standard applies here, to rebut arguments and citations by Ropeta on what evidentiary threshold applies.	.60
08/12/25	BTIGA	Prepare additional portions of the statement of facts, including sections on the procedural history of Ropeta's removal, the prior case, and additional facts and citations to text messages that tend to show his aims or intent.	.90
08/12/25	BTIGA	Prepare additional written arguments rebutting Ropeta's argument that the conduct at issue was not related to the office from which he was removed and additional practical and policy deficiencies with Ropeta's arguments.	1.10
08/12/25	BTIGA	Analyze case law opinions discussing removal of municipal board members and the definitions of misfeasance and malfeasance for use in brief to rebut arguments on those definitions from Ropeta.	1.10
08/12/25	BTIGA	Analyze principal case cited by Ropeta on whether official conduct or charges relate to the specific office and other cases citing or cited by that case.	1.20
08/13/25	BTIGA	Analyze cases related to statutory interpretation with notes on references and proper definitions of key words in the MPEA as argued by Ropeta.	.70
08/13/25	BTIGA	Prepare written argument on Ropeta's conduct and arguing in favor of the finding of malfeasance based on the evidence presented and the text messages and emails from Ropeta.	.80
08/13/25	BTIGA	Prepare responsive written arguments against Ropeta's assertion that he did not have ill intent because he did not make additional edits to the letter that was delivered, using text message evidence to show Ropeta's involvement.	.90
08/13/25	BTIGA	Analyze cases involving administrative tribunals and other proceedings reviewed by circuit courts and evidentiary standards used, with notes on arguments to rebut Ropeta arguments discussing the lack of evidence in this case.	.90
08/13/25	BTIGA	Prepare written argument rebutting the heightened mens rea argument from a criminal case that Ropeta proposed.	1.00
08/13/25	BTIGA	Prepare written argument on whether Ropeta's conduct can be punished if he was acting in a different office capacity compared to the office that faced removal, arguing against the principal case cited by Ropeta and additional citations to the MPEA and reference to Ropeta's status as ex officio member.	1.60
08/14/25	BTIGA	Prepare introduction and conclusion with summary of arguments and edit and revise portion of argument sections for cohesion of arguments throughout the brief.	.80
08/14/25	BTIGA	Review certified record and citations to the record for accuracy and citations to the best evidence available in the certified record.	.80
08/14/25	JJG	Assist with preparation of and proposed revisions to court ordered brief in opposition to plaintiff's motion for superintending control	5.40
08/15/25	BTIGA	Compile certified record and other items necessary for filing and check for compliance of brief with court's scheduling order and with court rules related to briefs.	.60
08/18/25	JJG	Final revisions and formatting of court ordered responsive brief	.70
08/18/25	KSMOL	delivered Judge's copy of the response brief to the courthouse in Brighton and filed a copy at the clerk's office in Howell	2.20
08/19/25	JJG	Correspondence from / to court clerk regarding courtesy copy of Respondent's brief	.20
08/19/25	JJG	Compilation of Respondent's Brief in Word format as requested by court clerk	.40
08/21/25	JJG	Review and analysis of Order Setting Hearing of Judge Longworth regarding	.20

08/22/25	JJG	Complaint for Superintending Control	
		Prepare report to Township Attorney regarding order setting hearing date	.50
		Total Hours	<u>31.70</u>
		Total Value of Services	<u>\$10,655.00</u>

<u>Time Summary by Timekeeper</u>	<u>Hours</u>	<u>Amount</u>
Benjamin Tigay	21.90	7,665.00
John J. Gillooly	7.60	2,660.00
Karsten Smolinski	2.20	330.00

Costs Advanced:

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/18/25	Fee to Karsten Smolinski for Mileage Charge - 28.1 miles from 222 N 1st St, Brighton, MI 48116, USA to 204 S Highlander Way, Howell, MI 48843, USA - Return Trip	19.67
08/18/25	Fee to Karsten Smolinski for Mileage Charge - 45.7 miles from 1155 Brewery Park Blvd, Detroit, MI 48207, USA to 222 N 1st St, Brighton, MI 48116, USA	31.99
	Total Costs Advanced	<u>\$ 51.66</u>
	Total Due This Invoice	\$10,706.66

Invoices for legal services are due upon receipt. To ensure proper application of your payment, please indicate our invoice number and client/matter number on your remittance.