

**COMMONWEALTH OF KENTUCKY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**ELECTRONIC APPLICATION OF )  
HARDIN COUNTY WATER DISTRICT ) CASE NO. 2023-00247  
NO. 2 FOR A GENERAL ADJUSTMENT )  
OF RATES )**

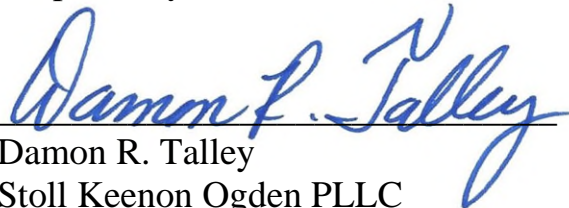
**FOURTH SUPPLEMENTAL RESPONSE TO COMMISSION STAFF'S  
FIRST REQUEST FOR INFORMATION**

Hardin County Water District No. 2 (“Hardin District”) gives notice of the filing of its Fourth Supplemental Response to Commission Staff Request 1-12d reflecting a summary of all expenses incurred in conjunction with this proceeding as of February 7, 2024.

Previously unsubmitted supporting invoices for expenses are also attached.

Dated: February 7, 2024

Respectfully submitted,



Damon R. Talley  
Stoll Keenon Ogden PLLC  
P.O. Box 150  
Hodgenville, KY 42748-0150  
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Fax: (270) 358-9560  
damon.talley@skofirm.com

Gerald E. Wuetcher  
Stoll Keenon Ogden PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801  
Telephone: (859) 231-3017  
Fax: (859) 259-3597  
gerald.wuetcher@skofirm.com

*Counsel for Hardin County Water District  
No. 2*

### **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8 and the Commission's Order of July 22, 2021 in Case No. 2020-00085, I certify that this document was submitted electronically to the Public Service Commission on February 7, 2024 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

  
\_\_\_\_\_  
Damon R. Talley

**Hardin County Water District No. 2  
Case No. 2023-00247**

**Analysis of Cost of Case No. 2023-00247**

**As of February 7, 2024**

Line No.	Item	Amount
1.	<b>Accounting</b>	\$ 0.00
2.	<b>Engineering</b>	\$ 0.00
3.	<b>Legal</b>	\$134,419.97
4.	<b>Consultants</b>	\$ 34,273.00
5.	<b>Other Expenses</b>	\$ 5,599.46
6.	<b>Total</b>	\$174,292.43

**Individual Expenses to Date**

Invoice	Date	Vendor	Nature of Expense	Check No.	Amount	USoA Account
20230914	09/13/2023	Kenvirons	Rate Study	8568	\$ 26,465.00	631
20240127	02/07/2024	Kenvirons	Rate Study		\$ 7,808.00	631
1021360	09/05/2023	Stoll Keenon Ogden PLLC	Legal Services	8559	\$ 11,133.50	633
1024305	10/04/2023	Stoll Keenon Ogden PLLC	Legal Services	8631	\$ 33,872.00	633
1027289	11/03/2023	Stoll Keenon Ogden PLLC	Legal Services	8711	\$ 23,677.50	633
1030108	12/04/2023	Stoll Keenon Ogden PLLC	Legal Services	8799	\$ 8,626.50	633
1033115	01/04/2024	Stoll Keenon Ogden PLLC	Legal Services	8871	\$ 15,286.50	633
1035811	02/05/2024	Stoll Keenon Ogden PLLC	Legal Services		\$ 41,823.97	633
23953	09/30/2023	Jobe Publishing Inc.	Public Notice	8643	\$ 2,025.00	660
24467	12/31/2023	Jobe Publishing Inc.	Public Notice	8848	\$ 72.00	660
339405	10/29/2023	Paxton Media Group	Public Notice	8703	\$ 3,394.05	660
	12/27/2023	Paxton Media Group	Public Notice		\$ 108.41	660
<b>TOTAL</b>					<b>\$174,292.43</b>	



**Kenvirons**

770 Wilkinson Blvd. • Frankfort, KY 40601 • Phone: (502) 695-4357 • Fax: (502) 695-4363  
Civil & Environmental Engineering and Laboratory Services

February 7, 2024

Hardin County Water District No. 2  
1951 West Park Road  
PO Box 970  
Elizabethtown, KY 42701

ATTN: Shaun Youravich, General Manager

RE: Cost of Service Study  
Project No. 2023031 – Invoice No. 20240127  
Professional Services from July 6, 2023 through February 6, 2024

**- FINAL INVOICE -**

Principal Engineer – 39.0 hrs. @ \$195/hr. ....	\$	7,605.00
Clerk – 3.5 hrs. @ \$58/hr. ....	\$	203.00
<b>TOTAL INVOICE .....</b>		<b>\$ 7,808.00</b>

Respectfully Submitted,

KENVIRONS, LLC



R. Vaughn Williams, P.E.  
President

**Stoll Keenon Ogden PLLC**

**P.O. Box 150**

**112 North Lincoln Boulevard**

**Hodgenville, Kentucky 42748**

**(270) 358-3187**

**Tax ID # 61-0421389**

Hardin Co. Water District No. 2  
misham@hcwd2.org

February 5, 2024  
Invoice #: 1035811  
Account #: 432038/178794

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Re: 2023 Rate Increase

Fees rendered this bill	\$ 41,678.50
Disbursements	\$ 145.47
<b>Total Current Charges This Matter</b>	<b>\$ 41,823.97</b>

Please return this page with payment to:

Stoll Keenon Ogden PLLC  
PO Box 11969  
Lexington KY 40579-1969

Or pay electronically via ACH to:

Stoll Keenon Ogden PLLC  
Fifth Third Bank, Cincinnati OH  
ABA/Bank Routing Number: [REDACTED]  
Account Number: [REDACTED]  
Please reference your account and invoice #s  
Email remittance to:  
payments@skofirm.com

**Stoll Keenon Ogden PLLC**

**P.O. Box 150**

**112 North Lincoln Boulevard**

**Hodgenville, Kentucky 42748**

**(270) 358-3187**

**Tax ID # 61-0421389**

Hardin Co. Water District No. 2  
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Re: 2023 Rate Increase

Fees rendered this bill	\$ 41,678.50
Disbursements	\$ 145.47
<b>Total Current Charges This Matter</b>	<b>\$ 41,823.97</b>

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Professional Services for the period through 01/31/24, including the following:

Re: 2023 Rate Increase

Our Reference: 432038/178794/DRT/2404

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
01/01/24	Prepared Cross-Examination questions for Shaun, Mike Bell, and Tim Davis in advance of Witness Preparation session	DRT	1.50
01/01/24	Conferred with Jerry Wuetcher re Rate Study and COSS prepared by Vaughn Williams	DRT	NO CHARGE
01/01/24	Analyzed Rate Study and COSS prepared by Vaughn Williams re whether Vaughn Williams' assumptions were correct and whether his Statement of Adjusted Operations made all the necessary adjustments	DRT	1.10
01/02/24	Participated in Witness Preparation session at the HCWD2 office for Shaun Youravich and Tim Davis; participated in Teams Meeting with Vaughn Williams, Shaun Youravich, and Jerry Wuetcher re Vaughn Williams' testimony at upcoming PSC Hearing; prepared memo to file	DRT	5.50
01/02/24	Conferred with Vaughn Williams re his Rate Study and COSS; prepared memo to file re his assumptions	DRT	0.20
01/02/24	Participated in witness preparation session at District office; cross-examination of Witnesses Davis and Youravich; traveled to and from Elizabethtown to attend witness preparation session; conferred with D. Talley, S. Youravich and V. Williams	GEW	7.00
01/03/24	Conferred with Emily Childress re need to load certain documents onto the laptop for use at the PSC Hearing; also discussed preparation of Witness Notebook for each witness; discussed logistics for use of laptop in PSC Hearing Room	DRT	NO CHARGE
01/03/24	Prepared for Mike Bell witness preparation session	DRT	0.80
01/03/24	Participated in Witness Preparation session for Chairman Mike Bell at District office	DRT	2.80
01/03/24	Conferred with Shaun Youravich re preparing for PSC Hearing; participated in Teams Meeting with Vaughn Williams and Shaun Youravich to discuss Rate Study and other issues which might be discussed at PSC Hearing	DRT	0.70
01/03/24	Attended witness preparation session via Zoom for Chairman Mike Bell to prepare him for upcoming general rate case Hearing	ESC	2.00
01/03/24	Conferred with D. Talley re preparations for general rate case Hearing	ESC	0.50
01/03/24	Prepared and organized case filings and exhibits in anticipation of upcoming general rate case Hearing before the Kentucky Public Service Commission; compiled digital Witness Books to include each witness' filed testimony and data request responses	ESC	2.60

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
01/03/24	Prepared for Chairman Bell's witness preparation session; participated in cross-examination of Chairman Bell; prepared outline of questions to use for cross-examination of Vaughn Williams	GEW	3.10
01/04/24	Prepared for Teams Meeting with Emily Childress re PSC Hearing and division of responsibility	DRT	0.40
01/04/24	Participated in Teams Meeting with Emily Childress to assign responsibility for Hearing preparations and at the Hearing; discussed electronic and hard copy Witnesses Books and their content; discussed strategy for PSC Hearing; commenced discussing issues to include in Post-Hearing Brief; prepared memo to file	DRT	1.10
01/04/24	Reviewed email memo from Shaun; reviewed the Schedule of HCWD1's purchases from HCWD2 during 2023; prepared reply email memo to Shaun	DRT	0.20
01/04/24	Prepared email memo to Molly Loy re coordinating logistics for witness presentation for upcoming Hearing at Public Service Commission	ESC	0.30
01/04/24	Conferred with Molly Loy to discuss logistics of technology set-up in anticipation of upcoming rate case Hearing at Public Service Commission; exchanged email memos with Damon Talley re the same	ESC	0.60
01/04/24	Conferred with D. Talley re planning logistics for upcoming rate case Hearing at Public Service Commission	ESC	0.90
01/04/24	Met with E. Childress and exchanged email memos with her; began assisting her for Hearing preparation, including technology and Witness Notebooks	MML	0.70
01/05/24	Reviewed and analyzed Written Testimony of Vaughn Williams; analyzed Rate Study prepared by Vaughn Williams; prepared for Witness Preparation session with Vaughn Williams	DRT	1.30
01/05/24	Conducted Witness Preparation session with Vaughn Williams, including cross-examination of Vaughn Williams; prepared memo to file	DRT	2.10
01/06/24	Reviewed Written Testimony of Shaun Youravich re retention of employees and health insurance premiums; reviewed other portions of the case record in the rate case proceeding to determine whether any additional proof needs to be introduced at the Hearing; prepared lengthy email memo to Gerald Wuetcher re legal issues which might need to be addressed at the Hearing and in the Post Hearing Brief	DRT	1.10
01/07/24	Prepared detailed email memorandum re required evidentiary record on health insurance issue for D. Talley and need to introduce testimony at the Hearing	GEW	1.50
01/08/24	Reviewed lengthy Legal Memorandum prepared by Jerry Wuetcher re treatment of Health Insurance benefits in prior PSC Orders, "reasonableness" of BLS' national average for employer's share of	DRT	0.60

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	health insurance premiums for employees utilized by PSC, possible public domain and official records that could be introduced at the Hearing, and reviewed other legal issues raised by Jerry Wuetcher; prepared reply email memo to Jerry Wuetcher		
01/08/24	Participated in Witness Preparation session with Mandy Isham to answer her questions and prepare for PSC Hearing; prepared memo to file afterward with list of follow-up issues	DRT	1.50
01/09/24	Prepared for upcoming Hearing before the Public Service Commission by compiling supplies and testing technology; drafted correspondence to Molly Loy and Damon Talley to confirm logistics and planning	ESC	1.50
01/09/24	Conferred with E. Childress and assisted her with Hearing preparation	MML	0.70
01/10/24	Prepared for PSC Hearing, including preparing outline of Direct Examination for five (5) witnesses and prepared Trial Notebook	DRT	2.50
01/10/24	Conferred with client to answer final questions about PSC Hearing and to prepare Shaun for the PSC Hearing	DRT	0.50
01/10/24	Organized files and pleadings in preparation for the PSC Hearing; packed Brief cases to take to the PSC Hearing	DRT	NO CHARGE
01/11/24	Participated in Hearing before the PSC in Frankfort, Kentucky; traveled from Hodgenville to Frankfort and return trip	DRT	7.60
01/11/24	Conferred with Emily Childress following PSC Hearing about Next Steps and assigned responsibilities to her	DRT	NO CHARGE
01/11/24	Conferred with Jerry Wuetcher following PSC Hearing and assigned certain responsibilities to him	DRT	NO CHARGE
01/11/24	Attended Public Service Commission hearing in Frankfort; drove to and from Frankfort; discussed strategy for post-hearing briefing and responses to data requests with D. Talley	ESC	5.80
01/11/24	Viewed PSC Hearing; conferred with D. Talley to discuss Hearing; prepared Open Records Request to Economic Development Cabinet re BlueOvalSK wage and fringe benefits	GEW	3.60
01/12/24	Reviewed notes from PSC Hearing; prepared list of potential issues to include in Post-Hearing Brief; reviewed and revised the list of issues; prepared email memo to Jerry Wuetcher and Emily Childress and attached list of issues for their consideration	DRT	0.60
01/12/24	Reviewed email memo from Emily Childress re Post-Hearing Data Requests; reviewed copy of Emily Childress' notes, list of Post-Hearing Data Requests, and reviewed copy of her Hearing notes	DRT	NO CHARGE
01/12/24	Prepared email memo to Emily Childress and attached PSC Orders from four (4) recent General Rate cases for water districts for her use in preparing the Post-Hearing Brief	DRT	NO CHARGE

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
01/12/24	Reviewed and circulated notes from PSC Hearing to D. Talley and G. Wuetcher for purposes of drafting Post-Hearing Brief	ESC	0.60
01/16/24	Prepared template for Response to Commission Staff's Post-Hearing Request for Information	ESC	0.40
01/16/24	Conferred with M. Wingate (General Counsel of Cabinet for Economic Development) re Open Records Act request; prepared January 2024 Rate Case Expense Report	GEW	0.50
01/17/24	Made final revisions to rate case expense report; filed report with PSC	GEW	0.20
01/18/24	Reviewed Final Orders from the Public Service Commission in water district general rate cases as research in anticipation of drafting Post-Hearing Brief; prepared template for Post-Hearing Brief; drafted introductory portion of Post-Hearing Brief	ESC	1.90
01/19/24	Researched benefits provided by Blue Oval SK	GEW	1.00
01/22/24	Reviewed email memo from Jerry Wuetcher re Open Records Response by Cabinet for Economic Development; reviewed 42 pages of documents provided by Cabinet for Economic Development to determine wage rates and benefits to be paid by BOSK; exchanged additional email memos with Jerry Wuetcher	DRT	0.80
01/22/24	Prepared email memo to Shaun re documents produced by Cabinet for Economic Development; attached documents provided by Cabinet for Economic Development; suggested portions of these documents for Shaun to review	DRT	0.20
01/22/24	Prepared for meeting with District Management Staff to discuss the PSC Staff's Post-Hearing Request for Information	DRT	NO CHARGE
01/22/24	Conferred with District's Management Staff to review PSC Staff's Post-Hearing Request for Information; discussed the District's proposed responses to the Request for Information; reviewed some of the documents which will be responsive to the Post-Hearing Request for Information	DRT	2.50
01/22/24	Reviewed information provided by insurance agent and Tim Davis which might be responsive to PSC Staff's Post-Hearing Request for Information; reviewed these documents in very lengthy conference call with Tim Davis; prepared memo to file	DRT	0.80
01/23/24	Exchanged numerous email memos with Emily Childress and Jerry Wuetcher to assign responsibilities for preparing portions of the Response to the PSC Staff's Post-Hearing Request for Information	DRT	NO CHARGE
01/23/24	Reviewed numerous email memos from Kelli Lee at HCWD2 re documents needed to answer PSC Staff's Post-Hearing Request for Information; reviewed eight (8) different documents which are responsive to Questions 6, 7, 9, and 14 of the PSC Staff's Post-Hearing Request for Information; prepared reply email memos to Kelli Lee	DRT	2.10
01/23/24	Revised template for Response to PSC Staff's Post-Hearing Data	ESC	0.50

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	Request to include names of Responding Witnesses; emailed Certification page to Shaun Youravich for signature; reviewed documents sent by client to include in Response		
01/24/24	Reviewed numerous email memos from Kelli Lee with HCWD2 and reviewed numerous documents, which might be responsive to PSC Staff's Post-Hearing Request for Information, forwarded by Kelli Lee; exchanged email memos with Kelli Lee re the documents	DRT	1.10
01/24/24	Prepared lengthy email memo to Jerry Wuetcher and Emily Childress re organizing and labeling the various documents which will be used as attachments and exhibits to HCWD2's Response to the PSC Staff's Post-Hearing Request for Information; exchanged follow-up email memos with Jerry Wuetcher and Emily Childress	DRT	NO CHARGE
01/24/24	Reviewed multiple email memos from Emily Childress concerning whether certain documents and information contained in the Board Booklets should be redacted; reviewed the information and documents in question; prepared follow-up emails to Emily Childress; reviewed and replied to other email memos from Emily Childress re other documents	DRT	0.80
01/24/24	Prepared email memo to Emily Childress re documents to be filed in response to Question 12 to PSC Staff's Post-Hearing Request for Information; suggested the use of a different format and the need to add sub-totals for salaries and benefits to the documents; reviewed revised Attachment 12 prepared by Emily Childress; suggested additional revisions; reviewed and approved the second revised version of Attachment 12	DRT	0.80
01/24/24	Reviewed client documents responsive to PSC Staff's Post-Hearing Data Requests; compiled 2023 Board Meeting Minutes and 2020-2023 Board Booklets; reviewed for and redacted personal information from documents as necessary	ESC	1.80
01/24/24	Prepared email memo to D. Talley re Response to Post-Hearing Request for Information re Commissioner benefits; conferred with E. Childress re Response to Post-Hearing Request for Information	GEW	0.20
01/25/24	Reviewed numerous documents provided by client which are responsive to the PSC Staff's Post-Hearing Request for Information; exchanged email memos with client to obtain answers to certain questions and re the documents	DRT	2.40
01/25/24	Conferred with Emily Childress re various matters pertaining to HCWD2's Response to the PSC Staff's Post-Hearing Request for Information and which documents to convert to pdf	DRT	NO CHARGE
01/25/24	Prepared narrative answers to several of the questions contained in the PSC Staff's Request for Information; reviewed documents found by Jerry Wuetcher on the internet re the benefits to be paid by BOSK; reviewed documents obtained by Shaun re unemployment in Hardin County and other background information needed to answer some of the questions about the benefits to be paid by BOSK	DRT	1.80
01/25/24	Reviewed numerous documents, charts, and tables prepared by Emily Childress summarizing the information provided by client or	DRT	2.60

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	presenting the information in a more understandable format; made suggested revisions to some of the tables and charts; answered questions from Emily Childress re need to protect the confidentiality of some of the information and documents provided by client		
01/25/24	Exchanged numerous other email memos with Emily Childress and Jerry Wuetcher re preparation of the Response to PSC Staff's Post-Hearing Request for Information	DRT	NO CHARGE
01/25/24	Drafted portions of Response to Post-Hearing Data Request; reviewed and formatted Attachments for filing; redacted any necessary information from Attachments	ESC	4.40
01/26/24	Exchanged email memos with Shaun re Questions 4 and 5 Of the PSC Staff's Post-Hearing Request for Information; reviewed information provided by Shaun re CPI Indexes; revised Response to Question 4	DRT	0.50
01/26/24	Prepared email memo to Shaun Youravich re start date and purchases made by District No. 1; reviewed reply email memo from Shaun; prepared follow-up email to Shaun; reviewed Customer History Usage Report for District No. 1; used this information to prepare response to Question 9 of the Response to the PSC Staff's Post-Hearing Request for Information	DRT	0.40
01/26/24	Prepared first draft of narrative answers to seven (7) of the Questions contained in the PSC Staff's Post-Hearing Request for Information; reviewed and revised the narrative answers	DRT	2.10
01/26/24	Exchanged numerous email memos with Emily Childress and Gerald Wuetcher re the Response and Attachments which are responsive to the PSC Staff's Post-Hearing Request for Information	DRT	NO CHARGE
01/26/24	Reviewed draft narrative answer to Question 8 of PSC Staff's Post-Hearing Request for Information; made suggested revisions to the draft answer; reviewed six (6) documents under consideration as Attachments to the Response to Question 8; decided to use all six (6) documents	DRT	1.20
01/26/24	Reviewed revisions made by Emily Childress to the narrative answer to Question 12 of the Response to the PSC Staff's Post-Hearing Request for Information; approved the use of the Table within the narrative answer to Question 12; approved the revised answer, including the use of the Table	DRT	0.50
01/26/24	Reviewed multiple drafts of the narrative answers to the Response to PSC Staff's Post-Hearing Request for Information; made several suggested revisions to the Response; reviewed the proposed Attachments to be filed with the Response	DRT	2.20
01/26/24	Drafted portions of Response to PSC Staff's Post-Hearing Request for Information	ESC	1.70
01/26/24	Conducted additional research concerning fringe benefits and wages to be paid by BOSK; prepared response to Post-Hearing Request for Information Question No. 8; reviewed and revised response to Question No. 8; prepared Response to Post-Hearing	GEW	5.10

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<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Hours</u>
	Request for Information for filing; filed Response and Attachments with PSC		
01/29/24	Prepared list of additional issues to consider including in the Post-Hearing Brief; participated in Teams meeting with Jerry Wuetcher and Emily Childress to discuss issues to be included in the Post-Hearing Brief, assigned responsibility for preparing first draft of portions of the Post-Hearing Brief; discussed other issues and legal strategy	DRT	1.10
01/29/24	Conferred with D. Talley and G. Wuetcher re strategy for preparing Post-Hearing Brief and compiled list of topics to be included in the Post-Hearing Brief	ESC	1.00
01/29/24	Conferred with D. Talley and E. Childress re preparation of Post-Hearing Brief; discussed strategy and list of topics to be included in Post-Hearing Brief	GEW	1.00
01/31/24	Reviewed HCWD2's PSC Annual Report for 2020, 202, and 2022 to determine and verify Interest and Dividend Income for each year; compared it with 2023 Interest and Dividend Income	DRT	0.30
01/31/24	Prepared portions of first draft of Post-Hearing Brief, including the portion concerning Interest and Dividend Income; calculated the three (3) year average amount of Interest and Dividend Income	DRT	1.40
<b>Total Services</b>			<b>\$41,678.50</b>

**Summary of Services**

<u>Init</u>	<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Value</u>
MML	Loy, M M	1.40	310.00	434.00
GEW	Wuetcher, G E	23.20	405.00	9,396.00
DRT	Talley, D R	57.70	405.00	23,368.50
ESC	Childress, Emily	26.50	320.00	8,480.00
	<b>Total Services</b>	<b>108.80</b>		<b>\$41,678.50</b>

**Disbursements**

<u>Date</u>	<u>Description</u>	<u>Tkpr</u>	<u>Amount</u>
01/02/24	, 1/2/2024 - Versailles to Elizabethtown and return	GEW	\$100.87
01/05/24	Duplicating Charges		\$0.80
01/05/24	Duplicating Charges		\$1.20
01/05/24	Duplicating Charges		\$5.80
01/05/24	Duplicating Charges		\$18.00
01/05/24	Duplicating Charges		\$18.80
	<b>Total Disbursements</b>		<hr/> <b>\$145.47</b>
TOTAL FEES & DISBURSEMENTS			\$41,823.97
<b>Total Current Charges This Matter</b>			<b>\$41,823.97</b>