

IN THE CRIMINAL COURT OF HAMILTON COUNTY, TENNESSEE

STATE OF TENNESSEE

Plaintiff,

v.

DONYELL DEWAYNE HOLLAND,

Defendant.

DOCKET NO (s). 311081, 317210

DIVISION II

**MOTION TO FIND CASE
EXTENDED AND COMPLEX**

Comes now, David W. MacNeill, counsel for **DONYELL DEWAYNE HOLLAND**, pursuant to Tennessee Supreme Court Rule ("T.S.C.R. ") 1 3, § 2 (e) (I), and MOVES this Honorable Court to declare the above-style case to be extended and complex. In support of this Motion, counsel would show this Honorable Court the following:

1. As of August 16, 2024, the final disposition date in this cause, counsel expended a total of approximately 144 hours on this matter. The amount of compensation for services plus expenses is calculated to be \$7,432.15. Pursuant to T.S.C.R. 1 3, § 2 (d) (5) (A)(i) the maximum amount of compensation payable to counsel is three thousand six hundred dollars (\$3,600).

2. Counsel would aver that this case is extended and complex. Counsel's representation began in earnest when counsel was originally appointed on October 4, 2023. This matter was before the Court on First Degree Premeditated Murder - Tenn. Code Ann. § 39-13-202 (Felony Class M). Thereafter, the Government lodged a superseding to include, among other things, felony murder (Felony Class M) and especially aggravated kidnapping shortly before the trial in this matter under docket number 317210.

3. This Defendant faced the possibility of conviction and the imposition of a life sentence.

4. Because of the enormity of the exposure facing this Defendant, and the complexity of this case, counsel retained and conferred with a Private Investigator and Digital Forensic Expert and reviewed findings many times in preparation for a hearing. As a consequence of the extensive investigation that followed, counsel filed and prosecuted several pretrial motions, many of which were litigated pretrial, and during the trial in this cause.

5. Moreover, due to the complexities of this case there was voluminous discovery and correspondence from the State which required numerous hours to review and discern. There were numerous witnesses, all of whom provided diametrically opposed accounts of the events leading to the homicide, requiring an extensive investigation. Indeed, a court reporter was retained to produce transcripts of the various interviews, and counsel was required to travel to the locations of interest in the case to interview witnesses and survey the crime scenes.

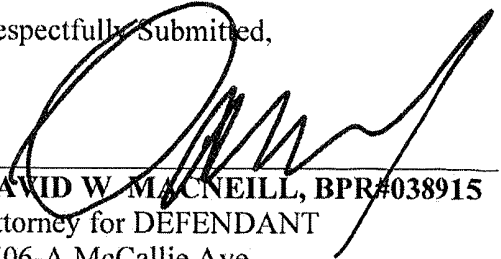
6. Moreover, given the timing of the case itself, the matter was before the Court several times for hearings, thereby requiring counsel to be ready for contested hearings on multiple occasions. Additionally, counsel was appointed to the case, and the matter was tried to a verdict in under eight months of counsel having been appointed to represent Mr. Holland.

7. Moreover, due to the exposure this Defendant faced, counsel spoke with Mr. Holland via telephone copious times, reviewed client letters, and met with the Defendant many times at the jail to prepare ourselves for trial.

8. In support of this motion, counsel has attached as **EXHIBIT A**, an abstract of the AOC bill that represents an accounting of the time spent on this matter that is offered to support a finding that this matter has exceeded the statutory renumeration schedule.

WHEREFORE, counsel **PRAYS** that this Honorable Court to declare the above styled case to be extended and complex pursuant to T.S.C.R. 13, § 2 (e) (I).

Respectfully Submitted,


DAVID W. MACNEILL, BPR#038915
Attorney for DEFENDANT
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CERTIFICATE OF SERVICE

I hereby certify that I mailed or otherwise delivered a true and exact copy of the foregoing Motion to all parties of interest or their counsel on this 22 day of Nov, 2024.


DAVID W. MACNEILL

Cc: Paul Moyle, Esq. and Charlie Minor, Esq., Assistant District Attorneys, 600 Market Street, Suite 310, Chattanooga, TN 37402

Attorney Fee Non Capital Claim

Claim ID	2025036451
County	HAMILTON
Court	CRIMINAL
Complex	No
Scaled	No
Name of Client	Donyell Dewayne Holland
Case / Docket No.(s)	311081 317210 317210 317210 317210 317210
Original Offense	39-13-305 - ESP AGGRAVATED KIDNAPPING
TCA Section	39-13-202 - FIRST DEGREE MURDER 39-13-202 - FIRST DEGREE MURDER IN PERPETRATION/ATT PERPETRATE A CRIME 39-13-202 - FIRST DEGREE MURDER IN PERPETRATION/ATT PERPETRATE A CRIME 39-13-305 - ESP AGGRAVATED KIDNAPPING 39-17-1324 - EMPLOY FIREARM INTENT TO GO ARMED - DANGEROUS FELONY 39-17-1307 - POSSESSION WEAPON - CONVICTED FELON
Class	M M M A C B
Type of Case	First Degree Murder
Conviction Offense	
Sentence Received	Life, Guilty of Felony Murder by Jury etc.
Date of Disposition	08/16/2024
Disposition of Case	Trial by Jury

In-Court Hours (Tenths)	In-Court Amount	Out-Of-Court Hours (Tenths)	Out-Of-Court Amount	Expenses	Reimbursement Total	Judge Approved Amount
22.90	1149.000	121.10	6070.000	213.150	7432.15	

	<i>I certify that the foregoing represents an accurate, complete statement of time and expenses in connection with the above action or proceedings.</i>
Attorney Signature	
Attorney and Firm Name	David Walter MacNeill of MacNeill Law Firm
Address	1506 McCallie Ave Ste A
City	Chattanooga
State	TN
Zip	37404
Phone	4233644365
Edison #	249494
	<i>Subject to the provisions of T.C.A. ' 40-14-207, the Court finds this to be reasonable</i>

EXHIBIT A

	<i>compensation for work done in the above-style case/appeal.</i>
Judge Signature	
Auditor Signature	
AOC Payment Amount	7432.15

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
03/04/2024	In Court	Hearing Status conference, case set to May 6, 2024 for status conference and pre-trial conference (.2)	0.20	10.00
04/23/2024	In Court	Hearing on Motions - State's response to Motion to Continue and Lower Bond heard and denied; First Motion in Limine granted by agreement of State; Second Motion in Limine granted as prior convictions, remainder to be held under abeyance; Third and Fourth Motions in Limine granted by agreement of the State; Fifth Motion in Limine granted by agreement with the parties; Case set to May 6th for pretrial conference (.9)	0.90	45.00
05/06/2024	In Court	Pretrial Conference attended- Request for 404 (B) Hearing withdrawn stricken; Case set for Jury Trial May 14, 2024 (.4)	0.40	20.00
05/14/2024	In Court	Jury Trial Day One - Jury Selected and Sworn, Oral Motion by the State for Rule 404 (B) Heard and Denied, Case set May 15, 2024 for continuation of Jury Trial (7.0)	7.00	350.00
05/15/2024	In Court	Jury Trial Day Two - Oral Motion by the State for Rule 404 (b) heard and granted, State Proof heard and rested, Oral Motion for Acquittal heard and denied, Notice of Intent to Seek Enhanced Punishment and/or Notice of Impeaching Convictions heard and granted, State rested, Case set May 16, 2024 for continuation of jury trial (7.0)	7.00	350.00
05/16/2024	In Court	Jury Trial Day Three - Defense waived right to testify and rested, Jury charged and excused to deliberate, Jury concluded deliberation, Jury verdict, Jury hear Felon in Possession count that was bifurcated, Judgement was issued (7.0)	7.00	350.00
08/16/2024	In Court	Hearing on Motion to Withdraw Granted; Rule 404(b) hearing held and acceptance and approval of Defendant's waiver of right to counsel granted (.4)	0.40	24.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
10/04/2023	Out of Court Hours - Telephone Calls	Phone call to clerk's office (.1); 2 emails sent/reviewed (.1)	0.20	10.00
10/05/2023	Out of Court Hours - Research & Review	Create hard copy client files (.4); Create computer client files (.5); Review affidavits of complaints and indictments (.6); Check for conflicts (.4); 5 emails sent/reviewed (.1)	2.00	100.00
10/09/2023	Out of Court Hours - Research & Review	Review Pro Se Motion to Reduce Bond (.2)	0.20	10.00
10/19/2023	Out of Court Hours - Research & Review	Review Pro Se Motion in Limine (.2)	0.20	10.00
11/02/2023	Out of Court Hours - Correspondence	2 emails sent/reviewed (.1)	0.10	5.00
11/06/2023	Out of Court Hours - Jail Visits	FaceTime Jail visit (.5); Review client file to prepare for jail visit (.5)	1.00	50.00
11/17/2023	Out of Court Hours - Research & Review	Review Pro Se Motion to Dismiss (.2)	0.20	10.00
11/29/2023	Out of Court Hours - Interviews/Meetings	Chambers conference with DA Moyle and Judge Dunn regarding a continuance of motion filing deadline (.4)	0.40	20.00
12/04/2023	Out of Court Hours - Research & Review	Review second Pro Se Motion to Reduce Bond (.2)	0.20	10.00
12/06/2023	Out of Court Hours - Correspondence	1 email sent/reviewed (.1)	0.10	5.00
12/19/2023	Out of Court Hours - Research & Review	Listen to Prelim Hearing Recording (1.1); 2 emails sent/reviewed (.1)	1.20	60.00
12/22/2023	Out of Court Hours - Jail Visits	In-person Jail visit (1.5); Travel time from 600 Georgia Ave., Chattanooga TN 37402 to 7609 Standifer Gap Rd., Chattanooga, TN 37421 (.6); Travel time from 7609 Standifer Gap Rd., Chattanooga, TN 37421 to 600 Georgia Ave., Chattanooga TN 37402 (.6)	2.70	135.00
01/08/2024	Out of Court Hours - Research & Review	Review Pro Se Motion to Compel (.2)	0.20	10.00
01/30/2024	Out of Court Hours - Correspondence	1 email sent/reviewed (.1)	0.10	5.00
02/02/2024	Out of Court Hours - Research & Review	Review Vehicle_search_.mp4 and take notes (1.0); Phone call from client regarding discovery and jail visit (.2); Review Order concerning Derik Brown (.2); Review Notice of Receipt of Cellphone Report (.2); Review 4th Pretrial Order (.2); Review prior attorney's motions (1.0)	2.80	140.00
02/06/2024	Out of Court Hours - Research & Review	Review paper discovery, crime scene photos, and review CSU Teakwood Drive videos (2.5)	2.50	125.00
02/08/2024	Out of Court Hours - Research & Review	Review video Vehicle_search_.mp4 (.8); Review witness J. Holiday interview and take notes Axon Interview - Interview_Room_1 - Face1Cam-2-converted.mp4 (1.5); 1 email sent/reviewed (.1)	2.40	120.00
02/13/2024	Out of Court Hours - Motions, Orders, Briefs	AFFIDAVIT FOR PI INVESTIGATIVE	0.20	10.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		SERVICES created, then edited (.1); AFFIDAVIT FOR ATTORNEY INVESTIGATIVE SERVICES created then edited (.1)		
02/15/2024	Out of Court Hours - Motions, Orders, Briefs	EX PARTE SEALED MOTION FOR AUTHORIZATION OF INVESTIGATION SERVICES edited and reviewed (.2); EX PARTE SEALED ORDER FOR PRIVATE INVESTIGATOR edited and reviewed (.1); 6 emails sent/reviewed (.3)	0.60	30.00
02/16/2024	Out of Court Hours - Telephone Calls	Phone call from client regarding discovery and jail visit (.2)	0.20	10.00
02/20/2024	Out of Court Hours - Research & Review	Review male witness interview and take notes Axon_Interview_-_Interview_Room_1_-_Face1Cam-3-converted.mp4 (1.5); Review Kiki interview (2.0); 3 emails sent/reviewed (.2)	3.70	185.00
02/21/2024	Out of Court Hours - Correspondence	3 emails sent/reviewed (.1)	0.10	5.00
02/22/2024	Out of Court Hours - Correspondence	1 email sent/reviewed (.1)	0.10	5.00
02/28/2024	Out of Court Hours - Jail Visits	FaceTime Jail Visit (.5); Review client file to prepare for jail visit (.4)	0.90	45.00
03/04/2024	Out of Court Hours - Interviews/Meetings	Consult with client (.5); Consult with ADA (.3); Court wait time (.2); Review client file to prepare for hearing (.3)	1.30	65.00
03/05/2024	Out of Court Hours - Research & Review	Axon_Body_3_Video_2020-05-28_2059.mp4 (1.0); Review Axon_Body_3_Video_2020-05-28_2021.mp4 (1.0); Motion for an Order Compelling the Government to Produce Notice of Intention to Use Evidence created and filed (.2)	2.20	110.00
03/06/2024	Out of Court Hours - Research & Review	Review 5th pretrial order and document dates on calendar (.3); Review Axon_Body_3_Video_2020-05-28_2020.mp4 (.2)	0.50	25.00
03/07/2024	Out of Court Hours - Research & Review	Discovery review Derek Brown Interview (2.0); Review Axon_Body_3_Video_2020-05-28_2204-2.mp4 (.3); 1 email sent/reviewed (.1)	2.40	120.00
03/08/2024	Out of Court Hours - Research & Review	Review and take notes again on Vehicle_search_.mp4 (.5); Listen to Donyell Holland Interview (2.2); Review Misty Kelly recording (.3); Amanda Conry recording (.5); 1 email sent/reviewed (.1)	3.60	180.00
03/11/2024	Out of Court Hours - Research & Review	Review search warrants and affidavits thereof (.5); Finish listening to Donyell Holland interview (1.0); Listen to Kiara Carson interview and take notes (1.2); Begin	3.00	150.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		listening to Derik Brown interview from 6-10 (.3)		
03/12/2024	Out of Court Hours - Research & Review	Watch Jennifer Holiday Axon Interview - Interview_Room_1 - Face1Cam.mp4 and take notes (1.2)	1.20	60.00
03/13/2024	Out of Court Hours - Research & Review	Payton Garrett Interview and Take Notes (1.4); Listen to Christopher Johnson.mp4 (.7); Listen to Amanda and Misty recording again (.5); EX PARTE MOTION FOR AUTHORIZATION OF FUNDS AND FOR PREPARATION OF TRANSCRIPTS OF INTERVIEWS OF DEFENDANTS, INTERVIEWS OF WITNESSES, AND JAIL TELEPHONE CALLS created, then edited (.9)	3.00	150.00
03/17/2024	Out of Court Hours - Research & Review	Watch Brittany Lanham video and take notes (1.7); Lauren Delaney interview (.9)	2.60	130.00
03/18/2024	Out of Court Hours - Correspondence	8 emails sent/reviewed (.3)	0.30	15.00
03/19/2024	Out of Court Hours - Research & Review	Review main witness interview (1.0); Review discovery photos (.5); Run background check on silver car owner and review (.2); Run background check on victim and review (.3); Travel to alleged crime scenes, Travel time from 1506 McCallie Ave, Chattanooga, TN 37404 to 4088 Teakwood Dr, Chattanooga, TN 37416 (.4); Travel time from 4088 Teakwood Drive Chattanooga, TN 37416 to 6305 Stockton Dr, Chattanooga, TN 37416 (.1); Travel time from 6305 Teakwood Dr, Chattanooga, TN 37416 to 1506 McCallie Ave, Chattanooga, TN 37404 (.4);	2.90	145.00
03/20/2024	Out of Court Hours - Research & Review	Review Response to Motion to Compel Discovery (.2); Print paper discovery for client and review (.5); 1 email sent/reviewed (.1)	0.80	40.00
03/21/2023	Out of Court Hours - Jail Visits	In-person jail visit (1.0); Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (.5); Travel time from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (.5)	2.00	100.00
03/22/2024	Out of Court Hours - Research & Review	2024-03-06 - Holland, Donyell - 311081 - Fifth Order Setting Case for Trial	0.20	10.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		reviewed (.1); 2 emails sent/ reviewed (.1)		
03/25/2024	Out of Court Hours - Research & Review	View Photos of teakwood (.9); Phone call to clerk's office (.1); MOTION FOR AUTHORIZATION OF FUNDS AND FOR PREPARATION OF TRANSCRIPTS OF INTERVIEWS created, edited and reviewed (.5); ORDER FOR AUTHORIZATION OF FUNDS AND FOR PREPARATION OF TRANSCRIPTS created, edited and reviewed (.4); NOTICE OF INTENTION TO USE EVIDENCE reviewed (.1); 3 emails sent/ reviewed (.2)	2.20	110.00
03/26/2024	Out of Court Hours - Correspondence	7 emails sent/reviewed (.3)	0.30	15.00
03/28/2024	Out of Court Hours - Correspondence	6 emails sent/reviewed (.2)	0.20	10.00
04/02/2024	Out of Court Hours - Telephone Calls	Phone call from client (.2); Phone call with court reporter concerning links (.3); 8 emails sent/reviewed (.2)	0.70	35.00
04/03/2024	Out of Court Hours - Motions, Orders, Briefs	First Motion In Limine to Exclude Rape Allegations created, then edited and reviewed (.7); 2 emails sent/ reviewed (.1)	0.80	40.00
04/04/2024	Out of Court Hours - Research & Review	Research prior convictions (.9); Research any gang affiliations and character (.4); Review 12d2 (.4); Review Motion to Seek Enhanced Punishment (.2); SECOND Motion In Limine to Exclude prior convictions created, then edited (.5); Meeting with ADA attended (.5)	2.90	145.00
04/05/2024	Out of Court Hours - Research & Review	Research Giglio (.3); Download and review Speedway videos (1.2); Research Mitsubishi GPS and consult a mechanic (.5); FIFTH Motion In Limine to Exclude Gruesome Photographs created, then edited (.2); SIXTH MOTION IN LIMINE FOR DISCOVERY REQUESTS created, then edited and reviewed (.5); FOURTH MOTION IN LIMINE FOR DISCOVERY REQUESTS created, then edited and reviewed (.6); THIRD MOTION IN LIMINE GIGLIO MATERIAL created, then edited and reviewed (1.7); File First, Second, Third, Fourth, and Fifth Motions in Limine (.5); 11 emails sent/reviewed (.5)	6.00	300.00
04/08/2024	Out of Court Hours - Interviews/Meetings	Meeting with ADA Moyle attended (2.0); 5 emails sent/ reviewed (.3)	2.30	115.00
04/09/2024	Out of Court Hours - Jail Visits	In-person jail visit attended (2.0); Kyne Marshall-	3.80	190.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		Expert (Teleconference) attended (.5); NOTICE OF INTENTION TO USE EVIDENCE reviewed (.2); 2 emails sent/reviewed (.1); Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (.5); Travel time from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (.5)		
04/11/2024	Out of Court Hours - Research & Review	Donyell Holland State's 12(d)(2) Notice reviewed (.2); 1 email sent/reviewed (.1)	0.30	15.00
04/15/2024	Out of Court Hours - Telephone Calls	Phone call from client (.2)	0.20	10.00
04/16/2024	Out of Court Hours - Jail Visits	FaceTime jail visit (.5); Review client file to prepare for jail visit (.5)	1.00	50.00
04/18/2024	Out of Court Hours - Interviews/Meetings	Kyne Marshall, expert witness consultation (Office via Zoom) attended (1.5); MOTION TO CONTINUE AND TO LOWER BOND created, then edited and filed (1.2); 5 emails sent/reviewed (.1)	2.80	140.00
04/19/2024	Out of Court Hours - Correspondence	2 emails sent/reviewed (.1)	0.10	5.00
04/22/2024	Out of Court Hours - Research & Review	Review State's Motion in Limine and Memorandum of Facts (.5)	0.50	25.00
04/23/2024	Out of Court Hours - Interviews/Meetings	Consult with ADA (.3); Consult with client (.4); Court wait time (.2)	0.90	45.00
04/24/2024	Out of Court Hours - Correspondence	5 emails sent/reviewed (.2)	0.20	10.00
04/25/2024	Out of Court Hours - Research & Review	Review and Build timeline of events on Derik Brown (3.1); 7 emails sent/reviewed (.3)	3.40	170.00
04/29/2024	Out of Court Hours - Correspondence	2 emails sent/reviewed (.1)	0.10	5.00
04/30/2024	Out of Court Hours - Research & Review	Review Derik Brown interview from 6/10/20 and take notes (2.5); Research filing deadlines (.3); Email to DA and phone call to set up appointment to view physical evidence, review NCIC (.4)	3.20	160.00
05/01/2024	Out of Court Hours - Research & Review	Review Derik Brown jail calls x4 (1.0); Review C. Johnson interview (1.1); Listen to ext608_052820_at_1915.wav (.1); Review Leslie, Randall 20-052161 Miller CAD.pdf (.1); Review Medical Examiner's Reports (.5)	2.70	135.00
05/02/2024	Out of Court Hours - Correspondence	7 emails sent/reviewed (.2)	0.20	10.00
05/03/2024	Out of Court Hours - Research & Review	Meeting with Moyle reviewed and hand copied NCIC of all witnesses, reviewed all physical evidence with DA Moyle,	4.90	245.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		DA Minor, Defense Private Investigator, and DA Investigator (2.0); Reviewed Payton Garrett Interview (1.5); Phone calls and text with PI concerning official criminal records of witnesses (.3); Travel to location where body was allegedly found Travel time From 1506A McCallie Ave. Chattanooga, TN 37404 to US-64, Chattanooga, TN 37419 (.5); Travel time From US-64, Chattanooga, TN 37419 to 1506A McCallie Ave., Chatt., TN 37404 (.5); 1 email sent/reviewed (.1)		
05/06/2024	Out of Court Hours - Interviews/Meetings	Consult with ADA (.3); Consult with client (.5); 3 emails sent/reviewed (.1)	0.90	45.00
05/07/2024	Out of Court Hours - Jail Visits	Donyell Holland (Jail visit) attended (2.0); Interviewed Syltresha (April Brown) at 4088 Teakwood Dr. (.5); Interviewed Beverly at 4088 Teakwood Dr. (.4); Interviewed neighbor Jimmy at Glencoe St. (.5); Meeting with Kyne Marshall (.3); Meeting with Mike Chester Taylor CPD Investigations Unit to view trailer (1.0); Round trip travel time from 1506 McCallie Ave., Chattanooga, TN to 4088 Teakwood Drive Chatt., TN 37416 and back (.8); Round trip travel time from 1506 McCallie Ave., Chattanooga, TN 37404 to Glencoe St., Chattanooga, TN 37406 (.5); Travel time from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (.5); Travel time from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (.5)	7.00	350.00
05/08/2024	Out of Court Hours - Research & Review	Memo created - Holland (.1); Reviewed and printed more 4088 Teakwood photos for client (.3); Created a transcript of Jimmy Green video for client to review (.3); Phone call with client x2 (.5)	1.20	60.00
05/09/2024	Out of Court Hours - Interviews/Meetings	Attempt to interview Richard Leslie - Drove to 5012 Renezet drive to interview victim's brother, Richard Leslie. Knocked on door, no answer, Travel time from 1506 McCallie Ave, Chattanooga, TN 37404 to 5012 Renezet Dr, Chattanooga, TN 37416	6.30	315.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		(.4); Travel time from 5012 Renczet Dr, Chattanooga, TN 37416 to 1506 McCallie Ave, Chattanooga, TN 37404 (.4); Call to Medical Examiner office for witness interview, office said ME in Nashville. Left vm (.3); Interview Dr. Erin Carney, medical examiner (.6); Jail visit attended to prepare for trial (3.5); 2 emails sent/reviewed (.1); Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (.5); Travel time from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (.5)		
05/10/2024	Out of Court Hours - Research & Review	Review ProSe Motion to Challenge Prolonged Pretrial Confinement (.2); Review ProSE Motion in Limine (.2)	0.40	20.00
05/12/2024	Out of Court Hours - Trial Preparation	Trial prep, Review witnesses interviews, review TBI forensic evidence, review jury instructions (2.5); Client jail visit for trial prep (3.5); Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (.5); Travel time from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (.5)	7.00	350.00
05/13/2024	Out of Court Hours - Research & Review	Review witness charges from other counties (1.5); Get certified copies from courthouse (.5); Meet with PI (.5); Background check jury panel list (1.0)	3.50	175.00
05/15/2024	Out of Court Hours - Trial Preparation	Trial prep review - Review yesterday's testimony notes, review forensic evidence again, review Derik Brown notes, prepare Rule 29 arguments (1.6)	1.60	80.00
05/20/2024	Out of Court Hours - Correspondence	1 email sent/reviewed (.1)	0.10	5.00
05/21/2024	Out of Court Hours - Telephone Calls	Phone call from Carolyn (.2); 9 emails sent/reviewed (.3); Phone call with client about motion for a new trial (.2)	0.70	35.00
05/28/2024	Out of Court Hours - Telephone Calls	Phone call with client about trial transcripts and motion for new trial (.3)	0.30	15.00
06/05/2024	Out of Court Hours - Research & Review	Reviewed ProSe Motion for a New Trial (.3); 6 emails sent/reviewed (.2); Phone call (.3)	0.80	40.00

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
06/06/2024	Out of Court Hours - Telephone Calls	Phone call - request to see attorney (.1); 3 emails sent/reviewed (.1)	0.20	10.00
06/07/2024	Out of Court Hours - Research & Review	Review State Response to Pro Se Motion for New Trial (.3); 2 emails sent/reviewed (.1)	0.40	20.00
06/12/2024	Out of Court Hours - Telephone Calls	Phone call with client (.4)	0.40	20.00
06/20/2024	Out of Court Hours - Motions, Orders, Briefs	Motion to Consider Whether Defendant Should Proceed Pro Se created, then edited (.7); 1 email sent/reviewed (.1)	0.80	40.00
08/01/2024	Out of Court Hours - Correspondence	1 email sent/reviewed (.1)	0.10	6.00
08/06/2024	Out of Court Hours - Correspondence	4 emails sent/reviewed (.1)	0.10	6.00
08/12/2024	Out of Court Hours - Correspondence	3 emails sent/reviewed (.1)	0.10	6.00
08/13/2024	Out of Court Hours - Motions, Orders, Briefs	MOTION TO WITHDRAW HAMILTON COUNTY created, then edited, and filed (.3); 2 emails sent/reviewed (.1)	0.40	24.00
08/14/2024	Out of Court Hours - Correspondence	4 emails sent/reviewed (.2)	0.20	12.00
08/16/2024	Out of Court Hours - Interviews/Meetings	Consult with client (.4); Consult with ADA (.2)	0.60	36.00
12/22/2023	Mileage	Travel from 600 Georgia Ave., Chattanooga TN 37402 to 7609 Standifer Gap Rd., Chattanooga, TN 37421 (16 miles); Travel from 7609 Standifer Gap Rd., Chattanooga, TN 37421 to 600 Georgia Ave., Chattanooga TN 37402 (16 miles)	32.00	20.96
03/19/2024	Mileage	Travel miles from 6305 Teakwood Dr, Chattanooga, TN 37416 to 1506 McCallie Ave, Chattanooga, TN 37404 (8 miles); Travel miles from 1506 McCallie Ave, Chattanooga, TN 37404 to 4088 Teakwood Dr, Chattanooga, TN 37416 (8 miles); Travel miles from 4088 Teakwood Drive Chattanooga, TN 37416 to 6305 Stockton Dr, Chattanooga, TN 37416 (7 miles)	23.00	15.41
03/21/2024	Mileage	Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (10 miles); Travel from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (10 miles)	20.00	13.40
04/09/2024	Mileage	Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (10 miles)	20.00	13.40

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		miles); Travel from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (10 miles)		
05/03/2024	Mileage	Travel Miles From 1506A McCallie Ave, Chattanooga, TN 37404 to US-64, Chattanooga, TN 37419 (15 miles); Travel Miles From US-64, Chattanooga, TN 37419 to 1506A McCallie Ave., Chatt., TN 37404 (15 miles)	30.00	20.10
05/07/2024	Mileage	Travel miles from 1506 McCallie Ave, Chattanooga, TN 37404 to 4088 Teakwood Dr, Chattanooga, TN 37416 (8 miles); Travel from 4088 Teakwood Drive, Chattanooga, TN 37416 to 4062 Glencoe St, Chattanooga, TN 37406 (3 miles); Travel from 4062 Glencoe St, Chattanooga, TN 37406 to 1506 McCallie Ave, Chattanooga, TN 37404 (6 miles); Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (10 miles); Travel from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (10 miles)	37.00	24.79
05/09/2024	Mileage	Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (10 miles); Travel from Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (10 miles); Travel miles from 1506 McCallie Ave, Chattanooga, TN 37404 to 5012 Renezet Dr, Chattanooga, TN 37416 (9 miles); Travel miles from 5012 Renezet Dr, Chattanooga, TN 37416 to 1506 McCallie Ave, Chattanooga, TN 37404 (9 miles)	38.00	25.46
05/12/2024	Mileage	Travel from 1506 McCallie Ave, Chattanooga, TN 37404 to Hamilton County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 (10 miles); Travel from Hamilton	20.00	13.40

Line Item Service Date	Line Item TYPE	Line Item Description	Line Item QTY	Dollar Amount
		County Jail & Detention Center, 7609 Standifer Gap Rd, Chattanooga, TN 37421 to 1506 McCallie Ave, Chattanooga, TN 37404 (10 miles)		
04/25/2024	Miscellaneous Expense	Outsourced FedEx Print and Ship Copies 380 pages @ .10 each = 38.00 plus 9.99 shipping plus tax 6.08 = TOTAL 54.07	1.00	54.07
08/14/2024	Miscellaneous Expense	Outsourced FedEx Print and Ship Copies 18 pages @ .10 each = 1.80 plus 9.99 shipping plus tax .37 = TOTAL 12.16	1.00	12.16
Total:			366.00	7432.15