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ROBERT JACOBSEN

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ROBERT JACOBSEN,)	No. C-06-1905-JSW
)	
Plaintiff,)	DECLARATION OF VICTORIA HALL
)	IN SUPPORT OF PLAINTIFF'S
v.)	RESPONSE TO DEFENDANTS
)	MATTHEW KATZER AND KAMIND
MATTHEW KATZER, et al.,)	ASSOCIATES, INC.'S REPLY TO
)	PLAINTIFF'S OBJECTIONS TO
Defendants.)	DECLARATION OF R. SCOTT JERGER
)	
)	Courtroom: 2, 17th Floor
)	Judge: Hon. Jeffrey S. White

I, Victoria Hall, have personal knowledge to the facts stated herein and hereby declare as follows:

1. I am the attorney for Plaintiff Robert Jacobsen in this matter. I am submitting this Declaration in support of Plaintiff's Response to Defendants Matthew Katzer and KAMIND Associates, Inc.'s Reply to Plaintiff's Objections to Declaration of R. Scott Jerger.

2. Attached as Exhibit A is a true and correct copy of an email exchange between myself and R. Scott Jerger in the latter half of August 2006.

-1-

1
2
3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed this 6th day of October, 2006, in Rockville, Maryland.

6
7
8
9 By _____/s/_____
Victoria Hall

Hall Declaration Exhibit A

[Print](#) | [Close Window](#)**Subject: RE: Attorney Fees Declaration of Scott Jerger****From: victoria@vkhall-law.com****Date: Thu, Aug 24, 2006 9:40 am****To: Scott Jerger <scott@fieldlawfirm.com>**

Dear Scott,

I'm away from my home office today, so I don't have ready access to the supporting case law/rules that you request. The Court ordered on Aug. 11 that I file any objections plaintiff has to the declarations by Sept. 8, so we can discuss this further over the next two weeks to resolve the matter.

I look forward to working with you to resolve these issues.

Regards,

Victoria

----- Original Message -----

Subject: RE: Attorney Fees Declaration of Scott Jerger

From: "Scott Jerger" <scott@fieldlawfirm.com>

Date: Wed, August 23, 2006 2:06 pm

To: <victoria@vkhall-law.com>

Dear Victoria:

My declaration contains a statement of services rendered and summary of the time spent by each person in support of the fees claim as required by LR 54-6(b). As required by LR 54-6(a), I am sending you this declaration in an effort to meet and confer for the purpose of attempting to resolve any disputes with respect to the statement in my declaration.

In regard to the agreement I have with my client for legal services, this is a confidential document protected by attorney-client privilege. LR 54-6(b) does not require me to attach either this contract for legal services or my contemporary time records to my declaration. Please let me know if you have any authority which says otherwise.

I would very much like to meet and confer with you at your convenience either today or tomorrow regarding the fee statement in my declaration. Please let me know when you are available by phone and I will attempt to initiate a telephone conference.

Regards,
Scott

Scott Jerger
Field Jerger LLP
610 SW Alder, Suite 910
Portland, Oregon 97205
503.542.2015 (phone)
503.225.0276 (fax)
503.516.7127 (mobile)

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From: victoria@vkhall-law.com [mailto:victoria@vkhall-law.com]

Sent: Wednesday, August 23, 2006 12:18 PM

To: Scott Jerger

Subject: RE: Attorney Fees Declaration of Scott Jerger

Apologies for not getting back to you sooner. As you may have read from the email exchange that I'm having with Mr. Zeff, I did not return to Maryland until very late Monday and am just getting back into the office right now.

We would like to see included in the petition: invoices, daily time logs, the contract for services, and the like, that support the figures you state. Until we see that, we are unable to comment on the petition further.

Regards,

Victoria Hall

----- Original Message -----

Subject: RE: Attorney Fees Declaration of Scott Jerger

From: "Scott Jerger" <scott@fieldlawfirm.com>

Date: Wed, August 23, 2006 8:41 am

To: <victoria@vkhall-law.com>

Victoria:

Please let me know if you have any response to my fee declaration as soon as possible. I would like to file on Thursday because I will be in a meeting all day Friday.

Thanks,
Scott

Scott Jerger
Field Jerger LLP
610 SW Alder, Suite 910
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From: Scott Jerger
Sent: Monday, August 21, 2006 11:51 AM
To: 'victoria@vkhall-law.com'
Subject: Attorney Fees Declaration of Scott Jerger

Victoria:

Pursuant to LR, I'm required to initiate a discussion to attempt to resolve any disputes with respect to our attorney fees motion under the CA anti-SLAPP statute. To that end, I'm attaching a draft copy of the declaration I've prepared and intend to file at the end of the week. Please let me know if you have any concerns or would like to set up a time to discuss this over the telephone.

Regards,
Scott

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