

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF WINCHESTER

ESTHER P. SWEET,
Plaintiff,

v.

Case No. CL18-452

MICHAEL L. SWEET, JR.,
Defendant.

NOTICE OF CHARGING LIEN

To: Michael L. Sweet Jr.

Winchester, VA 22601

James J. McGuire, Esquire
BUCHBAUER & McGUIRE, P.C.
110 North Braddock Street
Winchester, VA 22601
Counsel for Plaintiff

— YOU ARE HEREBY NOTIFIED that pursuant to the provisions of § 54.1-3932 of the 1950 Code of Virginia, as amended, the Law Office of LORENA R. SMALLS, P.C. claims an Attorney's Charging Lien upon all marital property of the parties, upon all of the monies, properties, choices in action claims and demands in suit, and upon any property which may be awarded to the Defendant, Michael L. Sweet Jr., in this matter, upon any money or other property due to Defendant in the hands of the Plaintiff, and all other property in any way involved in this proceeding. The claim of this charging lien is imposed against, but not limited to, the former marital residence, accounts, vehicles, and retirements.

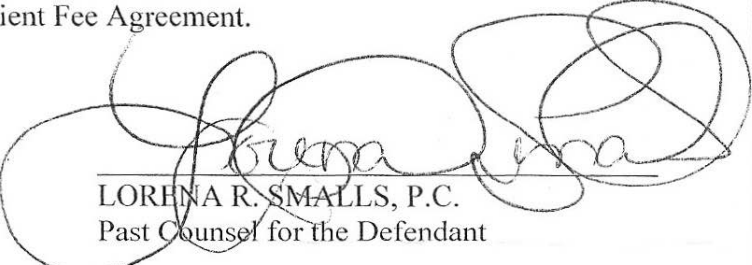
As grounds therefore, the undersigned states as follows:

1. That LORENA R. SMALLS, P.C. was retained by the Defendant, Michael L. Sweet Jr, to represent him in the above-captioned suit for dissolution of his marriage.

2. That the terms and conditions on which LORENA R. SMALLS, P.C. agreed to represent the Defendant are set forth in the Attorney/Client Fee Agreement between the parties dated August 22, 2018.

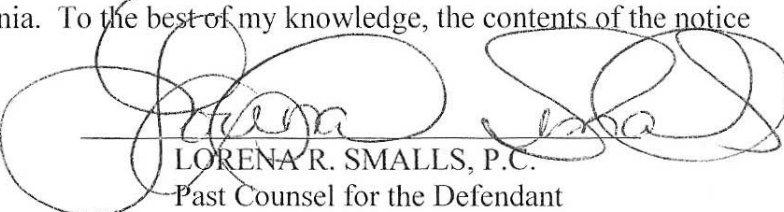
3. That as of January 4, 2019, Defendant is indebted to LORENA R. SMALLS, P.C. in the amount of \$475.00 for fees, costs advanced/incurred and delinquency charges pursuant to the Attorney/Client Fee Agreement of the parties. Defendant has been given credit for all payments by his up to the date of this Notice.

WHEREFORE, by this Notice, LORENA R. SMALLS, P.C. hereby claims an Attorney's Charging Lien in the amount of \$475.00. The Law Office of LAW OFFICE OF LORENA R. SMALLS, P.C. claims an ongoing Attorney's Charging Lien for all additional fees and costs advanced/incurred, as well as for all delinquency charges, which may accrue in the future pursuant to the aforesaid Attorney/Client Fee Agreement.


LORENA R. SMALLS, P.C.
Past Counsel for the Defendant

VERIFICATION

I am the Attorney named above. I have read the attached Notice and am familiar with its contents. At all times relevant to the Notice, I was and have been licensed to practice law in the Commonwealth of Virginia. To the best of my knowledge, the contents of the notice are true.


LORENA R. SMALLS, P.C.
Past Counsel for the Defendant

COMMONWEALTH OF VIRGINIA)
CITY/COUNTY OF WINCHESTER)

Subscribed and sworn to before me on the 4th day of January, 2019.

Holland A. Robinson
Notary Public



My Term Expires: 02/28/2019

CERTIFICATE

I hereby certify that I have this 4th day of January 2019 served a copy of the foregoing pleading on the below-named individuals, at the place and in the manner as follows:

By U. S. Mail, postage prepaid,

Michael L. Sweet

Winchester, VA 22601

James J. McGuire, Esquire
BUCHBAUER & McGUIRE, P.C.
110 North Braddock Street
Winchester, VA 22601
Counsel for Plaintiff

Lorena R. Smalls
Lorena R. Smalls, Esquire

Law Office of Lorena R. Smalls, P.C.
20 East Piccadilly Street
Suite 1
Winchester, VA 22601
(540) 667-2015

Law Office of Lorena R. Smalls, P.C.

Michael L Sweet
Winchester, VA 22601

Trust Account Summary for Michael L Sweet

Trust Balance on 12/17/2018: \$1,000.00

Trust account activity through December 17, 2018

Date	Invoice	Details	Amount	Balance
08/21/2018	--	Initial Balance	--	\$0.00
08/21/2018	--	Trust deposit	\$2,500.00	\$2,500.00
08/28/2018	#12854	Payment from trust	-\$437.50	\$2,062.50
09/25/2018	#12885	Payment from trust	-\$37.50	\$2,025.00
10/25/2018	#12924	Payment from trust	-\$400.00	\$1,625.00
11/21/2018	#12954	Payment from trust	-\$1,625.00	\$0.00
11/27/2018	--	Trust deposit	\$1,000.00	\$1,000.00

Invoice #12854

[VIEW FULL INVOICE \(PDF\)](#)

Paid


 **\$437.50****Michael L Sweet**


Winchester, VA 22601

Status **Paid**Total Balance Due **\$0.00**Invoice Date **Aug 28, 2018**Due Date **Aug 28, 2018**Payment Terms **Due on Receipt**Case **Sweet, Michael**

Time Entries

Description

 Attendance at Court; Aug 23, 2018	Attendance at court	\$175.00
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 Preparation Aug 27, 2018	Preparation of Answer and Counter-Complaint for Divorce	\$262.50
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Payment History

Description

 Payment Received Aug 28, 2018	Deposited into Operating Account via Trust	\$437.50
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Totals

Time Entry Sub-Total: \$437.50

Sub-Total: \$437.50

Total: \$437.50

Amount Paid: \$437.50

Terms and Conditions

*(ccd) = Client Courtesy Discount

Invoice #12885

[VIEW FULL INVOICE \(PDF\)](#)

Paid

✓ **\$37.50**

Michael L Sweet

Winchester, VA 22601

Status **Paid**

Total Balance Due **\$0.00**

Invoice Date **Sep 25, 2018**


Due Date **Sep 25, 2018**

Payment Terms **Due on Receipt**

Case **Sweet, Michael**


Time Entries

Description

 Review of Aug 29, 2018	Review of Answer to Counter-Complaint*(ccd)	\$87.50
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Adjustments

Description

 Discount applied to Time Entry	client courtesy discount	\$-50.00
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Payment History

Description



Payment Received
Sep 25, 2018

Deposited into Operating Account via Trust

\$37.50

Totals

Time Entry Sub-Total: \$87.50

Sub-Total: \$87.50

Discounts: \$-50.00

Total: \$37.50

Amount Paid: \$37.50

Terms and Conditions

*(ccd) = Client Courtesy Discount

Invoice #12924

[VIEW FULL INVOICE \(PDF\)](#)

Paid

 **\$400.00****Michael L Sweet**

Status

Paid

Winchester, VA 22601

Total Balance Due

\$0.00

Invoice Date

Oct 25, 2018

Due Date

Oct 25, 2018





Payment Terms Due on Receipt


Case

Sweet, Michael

Time Entries


Description

 Email exchange with Oct 3, 2018	Email exchange with client	\$87.50
 Email exchange with Oct 4, 2018	Email exchange with client; brief review of documents sent by client	\$87.50
 Email to Oct 9, 2018	Email to opposing counsel *(ccd)	\$87.50
 Attendance at Court; Oct 18, 2018	Attendance at hearing	\$175.00

 Review of email Oct 25, 2018	Review of opposing counsel's email *(ccd)	\$87.50
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Adjustments

Description

 Discount applied to Time Entry	client courtesy discount	\$-125.00
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Payment History

Description

 Payment Received Oct 25, 2018	Deposited into Operating Account via Trust	\$400.00
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Totals

Time Entry Sub-Total: \$525.00

Sub-Total: \$525.00

Discounts: \$-125.00

Total: \$400.00

Amount Paid: \$400.00

Terms and Conditions

*(ccd) = Client Courtesy Discount

Invoice #12954

[VIEW FULL INVOICE \(PDF\)](#)

Paid




 **\$1,625.00****Michael L Sweet**




Winchester, VA 22601

Status **Paid**Total Balance Due **\$0.00**Invoice Date **Nov 21, 2018**Due Date **Nov 21, 2018**Payment Terms **Due on Receipt**Case **Sweet, Michael**

Time Entries


Description

 Review of Oct 31, 2018	Review of documents from client; meeting with client; email offer to opposing counsel	\$787.50
 Review of Nov 1, 2018	Review of documents sent by client and emails; telephone call with opposing counsel's assistant x 2; email to client	\$87.50
 Email exchange with Nov 15, 2018	Email exchange with client; email exchange with opposing counsel; began preparation of Answers to Interrogatories	\$262.50

	Review of email Nov 16, 2018	Review of client's email*(ccd)	\$87.50
	Preparation Nov 19, 2018	Preparation of Answers to Interrogatories (paralegal-HAR)	\$100.00
	Review of Nov 20, 2018	Review of client's Responses to Request for Production of Documents; began preparation of Responses	\$350.00

Adjustments

Description

	Discount applied to Time Entry	client courtesy discount	\$-50.00
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Payment History

Description

	Payment Received Nov 21, 2018	Deposited into Operating Account via Trust	\$1,625.00
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Totals

Time Entry Sub-Total:	\$1,675.00
Sub-Total:	\$1,675.00
Discounts:	\$-50.00
Total:	\$1,625.00
Amount Paid:	\$1,625.00

Notes

Your Trust Account is Insufficient. Please replenish your Trust by \$1,000.00.

Terms and Conditions

*(ccd) = Client Courtesy Discount