

Gilligan, Anderson, Phelan, Williams & Green, P.A.

1531 SE 36th Ave.

Ocala, FL 34471

Risk Management

2701 North Rocky Pointe Drive

Suite 250

Tampa, FL 33607

Date: 12/7/2023

Invoice	Matter	Fees	Expenses	Other	Total
66665	Melkonian & Secki	\$188.75	\$40.00	\$0.00	\$228.75
66666	Williams and Greene (L003434864)	\$30,672.50	\$0.00	\$0.00	\$30,672.50
66667	Goff, James	\$6,026.25	\$0.00	\$0.00	\$6,026.25
66668	Hernandez, Pedro	\$587.50	\$0.00	\$0.00	\$587.50
66669	Shadow Oaks	\$10.00	\$0.00	\$0.00	\$10.00
<i>Total</i>		\$37,485.00	\$40.00	\$0.00	\$37,525.00

Gilligan, Anderson, Phelan, Williams & Green, P.A.

1531 SE 36th Ave.

Ocala, FL 34471

+352 8677707

BILL TO

PMA Management Corp/Risk

Mgmt.

Attn: Senior Account Claims

Representative

2701 North Rocky Pointe Drive

Suite 250

Tampa, FL 33607

INVOICE # 66669

DATE 11/30/2023

MATTER

Shadow Oaks

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
11/16/2023	SC- GPW: Case status meeting with Attorney Gwen Williams and Attorney Sydney Simmons	0.10	10.00

Subtotal: 10.00

Retainer information:

+ Previous account balance: \$472.26

+ New charges: \$10.00

- Previous retainer balance: \$0.00

- Payment made from retainer: \$0.00

= New account balance: \$482.26

= New retainer balance: \$0.00

BALANCE DUE

\$10.00

Hours Summary:

- SC- GPW (SC- GPW): 0.10h @\$100.00 = \$10.00

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Suite 250
Tampa, FL 33607

INVOICE # 66668**DATE 11/30/2023****MATTER**

Hernandez, Pedro

CLAIM #

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
11/14/2023	SC- GPW: Email exchange with Attorney Gwen Williams regarding pending tasks; Prepare Notice of Serving Proposal for Settlement, Proposal for Settlement and Release; Prepare and send email to Attorney Gwen Williams attaching same for review and approval	0.50	50.00
11/14/2023	SC- GPW: Prepare Motion to Compel Plaintiff's response to Second Interrogatories; Identify and mark Exhibit 1 to motion; Prepare and send email to Attorney Gwen Williams attaching Motion with exhibit for review and approval	0.50	50.00
11/14/2023	Patrick Gilligan: Office conference with Attorney Gwendolyn P. Williams about settlement strategy with Plaintiff	0.10	32.50
11/14/2023	Gwen Pasteur Williams: Email Paralegal Shannon Crandall re proposal for settlement and motion to compel to Plaintiff; Office conference with Attorney Patrick Gilligan re same; Review draft proposal for settlement, notice, and Motion to Compel; Email and office conferences with Paralegal Shannon Crandall re next steps	1	325.00
11/16/2023	Gwen Pasteur Williams: Office conference with Paralegal Shannon Crandall re case status and next steps re emailing opposing counsel re settlement; Email opposing counsel re same	0.20	65.00
11/21/2023	Gwen Pasteur Williams: Office conference with Attorney Sydney Simmons re conversation with City Attorney Will Sexton re further settlement discussions; Read email from opposing counsel re same; Email City Attorney Will Sexton latest emails re same	0.20	65.00

Subtotal: 587.50

Hours Summary:

- Gwen Pasteur Williams (Gwen Pasteur Williams): 1.40h @\$325.00 = \$455.00
- SC- GPW (SC- GPW): 1.00h @\$100.00 = \$100.00
- Patrick Gilligan (Patrick Gilligan): 0.10h @\$325.00 = \$32.50

BALANCE DUE**\$587.50**

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Suite 250
Tampa, FL 33607

INVOICE # 66667**DATE 11/30/2023****MATTER**

Goff, James

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
11/01/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about deposition of Lee Falcon and line of questioning	0.35	113.75
11/01/2023	SC: Office conference with Attorney Gwen Williams and Attorney Sydney Simmons regarding case status and deposition of Lee Falcon	0.20	20.00
11/01/2023	SMS: Begin preparing for Lee Falcon's deposition; Office conference with Attorney Sydney Simmons about deposition of Lee Falcon and line of questioning	0.45	146.25
11/01/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare deposition exhibits for deposition of Lee Falcon	0.30	30.00
11/01/2023	SMS: Prepare deposition outline and exhibits; Attend deposition and leave early due to Lee Falcon's non-appearance	2.80	910.00
11/01/2023	SMS: Email correspondence with Paralegal Shannon Crandall re calendaring response to Motion for Protective Order and strategy for response to same	0.20	65.00
11/02/2023	SMS: Email instructions to Paralegal re following up with court reporter on certificate of nonappearance for Lee Falcon	0.15	48.75
11/03/2023	SC: Review Response to Motion to Extend Deadline for Motion for Summary Judgment; Calculate and calendar reply deadline; Update case diary	0.30	30.00
11/03/2023	SC: Prepare and send email to court reporter re status of certificate of non-appearance	0.10	10.00
11/06/2023	SMS: Briefly review Affidavit filed by Lee Falcon in support of protective order	0.30	97.50
11/07/2023	SC: Office conference with Attorney Sydney Simmons regarding records subpoenaed by Dr. Cannon and cross-notice for depo; Prepare and file cross-notice of Dr. Cannon's deposition; Update case diary; Prepare and send email to opposing counsel attaching same and requesting records	0.50	50.00
11/07/2023	SC: Review email instruction from Attorney Sydney Simmons;	0.30	30.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	Prepare Proposal for Settlement with attached General Release and Notice of Serving Proposal for Settlement; Prepare and send email to Attorney Sydney Simmons attaching same for review/approval		
11/07/2023	SC: Review email from court reporter and attached Certificate of Non-Appearance for deposition of Lee Falcon; Update case diary; Prepare Notice of Filing same; Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.40	40.00
11/07/2023	SMS: Review medical records and outstanding subpoenas; Email and follow up office conference with Paralegal re obtaining outstanding records; Prepare for and attend deposition of Dr. Cannon	1.50	487.50
11/07/2023	Patrick Gilligan: Review affidavit of Lee Falcon; Draft email to Attorney Sydney Simmons about same	0.10	32.50
11/07/2023	SC: Revise and finalize Notice of Filing Certificate of Non-Appearance; File and serve same together with Certificate of Non-Appearance; Update case diary	0.20	20.00
11/07/2023	SC: Review email instruction from Attorney Sydney Simmons; Update task and calendar regarding discovery response extension granted to plaintiff; Prepare and send email to Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same and discovery cut-off deadline approaching	0.15	15.00
11/07/2023	SMS: Instruct Paralegal Shannon Crandall to begin preparing second Proposal for Settlement pursuant to City Attorney's instruction	0.20	65.00
11/08/2023	SC: Review Plaintiff's Response to Expert Request to Produce and produced documents; Update case diary; Review and respond to email from Attorney Patrick Gilligan	0.20	20.00
11/08/2023	Patrick Gilligan: Review response to expert discovery	0.20	65.00
11/16/2023	Patrick Gilligan: Review Notice of Filing Answers to Interrogatories; Instructions to Paralegal; Office conferences with Attorney Sydney Simmons about Proposal for Settlement/Negotiation Strategy	0.35	113.75
11/16/2023	SMS: Office conference with Attorney Gwendolyn Williams and Paralegal Shannon Crandall re deadlines pending and tasks	0.10	32.50
11/16/2023	SC- GPW: Case status meeting with Attorney Gwen Williams and Attorney Sydney Simmons	0.10	10.00
11/16/2023	SMS: Telephone conference with Attorney Babiarz re proposal for settlement; Follow up discussion with Attorney Patrick Gilligan re same; Follow up email to City Attorney re deadline for proposals for settlement	0.50	162.50
11/16/2023	SC: Email exchange with Jennifer at Babiarz office regarding exhibit exchange and Answers to Interrogatories; Follow up office conference with Attorney Sydney Simmons regarding exhibit exchange; Review unverified Answers to Expert Interrogatories; Prepare and send email to Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same	0.50	50.00
11/17/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise Proposal for Settlement, Release and Notice of Serving Proposal for Settlement; File and serve same; Update case diary and calendar due acceptance deadline; Prepare and send email to client	0.50	50.00
11/20/2023	SMS: Finish draft of Response to Motion for Protective Order; Send to Attorney Patrick Gilligan for review; Prepare exhibits for Response and send to Paralegal to finalize same	1.40	455.00

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DATE	DESCRIPTION	HOURS	AMOUNT
11/20/2023	SC: Review email from City Attorney's office regarding phone conference; Update calendar regarding same	0.10	10.00
11/20/2023	SMS: Review and edit final version of motion with exhibits; Email correspondence with Paralegal re same	0.50	162.50
11/20/2023	Patrick Gilligan: Review and revise Response to Motion for Protective Order and Sanctions	0.50	162.50
11/20/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise and finalize Response to Motion for Protective Order; Prepare exhibits to same; Office conference with Attorney Sydney Simmons regarding same; Prepare and send email to Attorney Sydney Simmons for final approval for filing	0.60	60.00
11/20/2023	SC: Review email from Attorney Sydney Simmons; File and serve Response to Motion for Protective Order; Update case diary; Prepare and send email to client attaching same	0.30	30.00
11/21/2023	SC: Email exchange with Jennifer at Babiarz office regarding exhibit exchange meeting	0.10	10.00
11/21/2023	SMS: Telephone conference with City Attorney re status of recent proposal for settlement; Follow up email to Attorney Babiarz re same	0.35	113.75
11/21/2023	SC: Review order deadlines and deadline for Pretrial Statement; Draft Pretrial Statement; Prepare and send email to Attorney Patrick Gilligan and Attorney Sydney Simmons attaching same for review and approval	0.70	70.00
11/24/2023	Patrick Gilligan: Review Pretrial Conference Statement from Plaintiff; Review and revise City's Pretrial Conference Statement; Instructions to Paralegal	0.25	81.25
11/26/2023	Patrick Gilligan: Draft email to Attorney Sydney Simmons about upcoming Pretrial Conference, expert disclosure and Proposal for Settlement	0.15	48.75
11/27/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about Pretrial Conference Statement and Motion to Extend time for hearing Motion for Summary Judgment	0.25	81.25
11/27/2023	SC: Review email instructions from Attorney Patrick Gilligan and Attorney Sydney Simmons; Revise Pretrial Statement; Prepare and send email to Attorney Sydney Simmons and Attorney Patrick Gilligan submitting Pretrial Statement for final approval	0.35	35.00
11/27/2023	SC: Review email instruction from Attorney Sydney Simmons; Finalize, file and serve Pretrial Statement; Update case diary; Prepare and send email to client attaching same	0.25	25.00
11/27/2023	SMS: Discussion with Paralegal Shannon Crandall re exhibit exchange with Attorney Babiarz; Telephone conference with Attorney Babiarz re same; Follow up with Paralegal Shannon Crandall re following up on outstanding subpoenas and beginning exhibit preparation for exchange	0.70	227.50
11/27/2023	SMS: Review and revise Paralegal's draft Pretrial Statement; Discussion with Attorney Patrick Gilligan re same and re Pretrial Conference strategy	0.40	130.00
11/27/2023	SMS: Email correspondence with City Attorney re strategy for potential settlement negotiations	0.25	81.25
11/28/2023	SMS: Begin preparing exhibits for trial; Finish preparing exhibits for trial and instruct Paralegal to prepare same for exhibit exchange	1.80	585.00
11/28/2023	Patrick Gilligan: Office conference with Attorney Trip Green and Attorney Sydney Simmons about trial handling responsibilities	0.30	97.50

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DATE	DESCRIPTION	HOURS	AMOUNT
11/28/2023	SMS: Office conference with Attorney Gwendolyn Williams and Paralegal re case status and exhibit exchange	0.20	65.00
11/28/2023	SMS: Telephone conference with Attorney Babiarz re in person exhibit exchange	0.10	32.50
11/28/2023	SMS: Email correspondence with Attorney Babiarz and with City Attorney re potential settlement; Discussions with Attorney Patrick Gilligan re same	0.40	130.00
11/28/2023	SC: Office conference with Attorney Sydney Simmons regarding exhibit exchange; Prepare and send exhibits to opposing counsel via Dropbox and prepare flash drive for same	0.30	30.00
11/28/2023	SC- GPW: Office conference with Attorney Gwen Williams and Attorney Sydney Simmons regarding case status and pending tasks	0.10	10.00
11/29/2023	Patrick Gilligan: Read email from Plaintiff's Attorney about current settlement demand; Office conference with Attorney Sydney Simmons about same; Office conference with Attorney Sydney Simmons about settlement documents	0.20	65.00
11/29/2023	SMS: Email correspondence with City Attorney re potential settlement; Brief discussion with Attorney Patrick Gilligan re same	0.25	81.25
11/29/2023	SMS: Exhibit exchange for trial with Attorney Babiarz; Discussion with Paralegal re preparation of documents for same	0.60	195.00
11/29/2023	SC: Review Notice of Settlement; Update case diary; Prepare and send email to client attaching same	0.10	10.00
11/29/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare Release, Dismissal and letter to opposing counsel; Prepare and send email to Attorney Sydney Simmons attaching same for approval	0.70	70.00
11/29/2023	SMS: Email to Paralegal requesting draft of Release, Dismissal, and Letter enclosing documents to Plaintiff's counsel; Review and approve drafts of documents for settlement	0.45	146.25
11/30/2023	SC: Email exchange with court reporter regarding settlement and canceling of trial	0.10	10.00
			Subtotal: 6,026.25

Hours Summary:

- SMS- PGG (SMS): 13.60h @\$325.00 = \$4,420.00
- Patrick Gilligan (Patrick Gilligan): 2.65h @\$325.00 = \$861.25
- SC- PGG (SC): 7.25h @\$100.00 = \$725.00
- SC- GPW (SC- GPW): 0.20h @\$100.00 = \$20.00

BALANCE DUE

\$6,026.25

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BILL TO

PMA Management Corp/Risk
Mgmt.
Attn: Senior Account Claims
Representative
2701 North Rocky Pointe Drive
Suite 250
Tampa, FL 33607

INVOICE # 66666**DATE** 11/30/2023**MATTER**

Williams and Greene (L003434...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
11/01/2023	Patrick Gilligan: Read and respond to email from Paralegal about setting Motions in Limine for hearing; Office conference with Paralegal and Attorney Sydney Simmons about hearing attendance; Read email from Plaintiff's attorney about same	0.50	162.50
11/01/2023	SC: Prepare and send follow up email to Attorney Patrick Gilligan and Attorney Sydney Simmons regarding hearing on Motions in Limine; Review email instruction from Attorney Sydney Simmons; Prepare and send email to JA requesting hearing dates/times for pending Motions in Limine to be heard prior to trial term	0.30	30.00
11/01/2023	SMS: Telephone conference with Jessica Schmor re Allegiant not wanting to produce contract requested by opposing counsel	0.20	65.00
11/01/2023	SC: Prepare and send email to JA requesting hearing dates/times for hearings on Motions in Limine; Review response email from JA; Office conference with Attorney Gwen Williams, Attorney Sydney Simmons and Attorney Patrick Gilligan regarding same; Prepare and send email to JA and opposing counsel regarding availability for hearing	0.40	40.00
11/01/2023	LMC: Prepare Notice of Appearance and Designation of Email Addresses on behalf of Trip Green as co-counsel	0.25	25.00
11/01/2023	SMS: Review email correspondence between Paralegal Shannon Crandall and judicial assistant re hearing on Motions in Limine; Follow up with Paralegal Shannon Crandall and Attorney Patrick Gilligan re hearing on motions; Email correspondence with Attorney Harran Udell re retroactivity of statute and proceeding with hearing	0.65	211.25
11/01/2023	SMS: Review and respond in opposition to email from Attorney Udell to JA re hearing on Motions in Limine	0.30	97.50
11/01/2023	SMS: Review Order recommended by Attorney Udell re Judge Sanders' rulings on statute at issue in Motions in Limine	0.30	97.50
11/02/2023	Edwin A. Green, III: Attend Trial Planning meeting	0.40	130.00
11/02/2023	SMS: Research whether hearings on Daubert motions are required	0.75	243.75

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DATE	DESCRIPTION	HOURS	AMOUNT
	to be evidentiary		
11/02/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about response to Plaintiff's Motion to Strike Expert	0.15	48.75
11/02/2023	SC: Review and respond to email instruction from Attorney Sydney Simmons; Locate and identify depo exhibits for depo of Elin Kunz with Allegiant; Prepare and send email to all parties regarding same; Office conference with Attorney Sydney Simmons regarding same	0.60	60.00
11/02/2023	SC: Review Dauber Motion from opposing counsel; Calculate response due date and calendar same; Update case diary; Prepare and send email to client attaching motion	0.25	25.00
11/02/2023	SMS: Zoom conference with Allegiant Jessica Schmor and their Attorney, Aaron Proulx, re issues with subpoena production related to deposition of Elin Kunz	0.35	113.75
11/02/2023	SMS: Office conference with Attorney Patrick Gilligan, Attorney Edwin A. Green, and Paralegal re strategy for trial	0.50	162.50
11/02/2023	SC: Trial prep meeting with Attorney Patrick Gilligan, Attorney Sydney Simmons and Attorney Trip Green	0.50	50.00
11/03/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about Motion to Strike fee expert; Read email from Judicial Assistant about position on trial docket	0.35	113.75
11/03/2023	SMS: Discussion with Attorney Patrick Gilligan informing him of research related to Daubert hearings being evidentiary	0.30	97.50
11/03/2023	SC: Review emails with JA and opposing counsel; Update calendar and case diary re trial priority; Prepare and send email to client and Elin with Allegiant regarding same; Prepare and send email to Officer Rainey regarding trial confirmation and trial prep meeting	0.50	50.00
11/05/2023	Patrick Gilligan: Instructions to Paralegal about preparing Notice of Intent concerning Duke Energy property records	0.25	81.25
11/06/2023	Edwin A. Green, III: Review emails regarding certification by records custodian of public records per 90.803 (6) fla stat; office conference with assistant Crandall regarding same; begin prep of jury instructions	0.40	130.00
11/06/2023	SC: Review email instruction from Attorney Patrick Gilligan; Email exchange and brief office conference with Attorney Sydney Simmons regarding preparation of Notice of Intent; Review records from Duke; Draft Notice of Intent to Offer Evidence at Trial; Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.50	50.00
11/06/2023	SC: Office conference with Attorney Trip Green regarding records from Duke to be authenticated; Review court records regarding same; Follow up office conference with Attorney Sydney Simmons regarding document needed from Duke regarding business records	0.20	20.00
11/06/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare and send email to attorney for Duke attaching all documents/records related to subpoena	0.15	15.00
11/06/2023	Patrick Gilligan: Review Notice of Intent about Duke property records; Review same; Office conference with Paralegal and Attorney Sydney Simmons about other methods of Proof concerning ownership	0.40	130.00
11/06/2023	SC: Email exchange with opposing counsel paralegal regarding upcoming trial exhibits and court reporter; Prepare and send email to court reporter regarding same; Office conference with Attorney	0.20	20.00

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DATE	DESCRIPTION	HOURS	AMOUNT
11/06/2023	Patrick Gilligan regarding instruction for power pole photos		
11/06/2023	SMS: Continue researching for and drafting Response to Plaintiff's Daubert Motion to Exclude Allegiant; Send draft Response to Attorney Patrick Gilligan for review	4.30	1,397.50
11/06/2023	SMS: Telephone conference with Duke's attorney re document authentication; Follow up email to Paralegal Shannon Crandall re same	0.35	113.75
11/06/2023	SMS: Telephone conference with Jessica Schmor from Allegiant re case law supporting Response to Daubert	0.20	65.00
11/07/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about Response to Motion to Strike Expert	0.10	32.50
11/07/2023	SC: Travel to crash scene and photograph electric poles and view from stop sign; Office conference with Attorney Sydney Simmons regarding same and additional trial preparation assignments	1	100.00
11/07/2023	SC: Prepare Notice of Filing Deposition Transcripts; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval	0.25	25.00
11/07/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare Records Certification and Affidavit for Duke Energy; Office conference with Attorney Sydney Simmons regarding same; Review Google Earth images for power poles; Prepare and send email to Attorney Sydney Simmons attaching certification and affidavit for review and approval	0.65	65.00
11/07/2023	SC: Office conference with Attorney Sydney Simmons and Attorney Patrick Gilligan regarding Amended Witness and Exhibit List; Prepare City's Amended Witness and Exhibit List; Review Plaintiff's Amended Witness and Exhibit List and identify amendments; Prepare and send email to Attorney Sydney Simmons and Attorney Patrick Gilligan regarding same and attaching City's Amended Witness and Exhibit List for review and approval	0.50	50.00
11/07/2023	Patrick Gilligan: Review and revise Response to Motion to Strike Expert	0.50	162.50
11/07/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise and finalize Notice of Filing; Review deposition transcripts and exhibits for depositions of Williams and Greene for redactions; File and serve all; Update case diary	0.70	70.00
11/07/2023	SC: Review email instruction from Attorney Patrick Gilligan; Review Notice of Appearance as Co-Counsel for Plaintiffs; Revise Certificate of Service; Update case diary	0.20	20.00
11/07/2023	SC: Review email instructions from Attorney Sydney Simmons; Revise Response to Daubert Motion; Prepare exhibits to same; Prepare and send email to Attorney Sydney Simmons attaching completed motion and exhibits	0.30	30.00
11/07/2023	SC: Review email from opposing counsel with trial exhibits; Review trial exhibits; Office conference with Attorney Sydney Simmons and Attorney Patrick Gilligan regarding same and introduction of our trial exhibits for identification at trial; Continue review of plaintiff trial exhibits	0.50	50.00
11/07/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise and finalize Response to Daubert Motion; File and serve same; Update case diary; Prepare and send email to Allegiant and client attaching same	0.25	25.00
11/07/2023	SC: Office conference with Attorney Sydney Simmons regarding	0.25	25.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	production of photographs to opposing counsel; Revise and finalize Amended Exhibit and Witness List; File and serve same; Update case diary; Prepare and send email to opposing counsel attaching link with photographs for trial		
11/07/2023	SMS: Begin review of Plaintiff Greene's deposition to prepare cross examination; Begin preparing cross examination for same	1	325.00
11/07/2023	SMS: Begin preparing direct examination of Officer Boyce Rainey	0.50	162.50
11/07/2023	SMS: Office conferences with Paralegal Shannon Crandall re trial exhibits and tasks; Follow up with Paralegal and Attorney Patrick Gilligan re same	0.35	113.75
11/07/2023	SMS: Review Attorney Patrick Gilligan's redline for Response to Daubert Motion; Incorporate changes into Response; Instruct Paralegal to file same	0.40	130.00
11/07/2023	SMS: Discuss changes in Plaintiffs' Amended Witness List with Paralegal Shannon Crandall; Review medical records to confirm knowledge of doctor to be witness; Email to Attorney Patrick Gilligan re same	0.30	97.50
11/07/2023	SMS: Review Elin Kunz's updated analysis to account for Florida Surgery Consultants' records of Plaintiff Greene; Email correspondence with Elin Kunz re same	0.30	97.50
11/07/2023	SMS: Discussion with Paralegal Shannon Crandall re drafting affidavit to provide to Duke for records; Follow up with Paralegal re need to amend exhibit list; Review and approve amended exhibit list for filing; Email to Attorney for Duke re executing affidavits and certificates of records	0.40	130.00
11/08/2023	SMS: Continue drafting Direct for Officer Rainey; Meet with Officer Rainey in preparation for trial	2	650.00
11/08/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about trial preparation and Fabre defense; Office conference with Attorney Sydney Simmons about officer testimony; review and revise same	0.90	292.50
11/08/2023	SMS: Follow up discussion with Paralegal instructing Paralegal to create exhibit for direct of Officer Rainey to dispute crash report	0.20	65.00
11/08/2023	Edwin A. Green, III: Review file; begin draft of jury instructions, statement of the case and verdict form	1.20	390.00
11/08/2023	SC: Office conferences with Attorney Sydney Simmons regarding trial strategy; Review emails from Attorney Sydney Simmons regarding power pole removed since accident	0.40	40.00
11/08/2023	SC: Complete review exhibits provided by Plaintiff for trial of medical providers and compare with records received through subpoena from providers to confirm portions not submitted for trial by plaintiffs; Office conference with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same; Prepare and send email summarizing same	3	300.00
11/08/2023	SMS: Finish drafting Direct of Officer Boyce; Discussion with Attorney Patrick Gilligan re same and edit direct based on discussions; Send to Attorney Patrick Gilligan for review	0.80	260.00
11/08/2023	SMS: Review and respond to email from City Attorney re settlement offer to Plaintiffs; Follow up with Attorney Patrick Gilligan re same; Email to Attorney Udell extending offer	0.35	113.75
11/08/2023	SMS: Review and respond to email from Attorney Udell re witnesses and exhibits for trial	0.20	65.00
11/08/2023	Patrick Gilligan: Office conference with Paralegal about comparison	0.10	32.50

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DATE	DESCRIPTION	HOURS	AMOUNT
	of Plaintiff's records for trial vs that produced in discovery		
11/08/2023	SC: Review Fla. R. Jud. Admin. 2.420 and 2.425; Redact required information from St. Joseph records for Rachelle Williams	1.20	120.00
11/08/2023	SMS: Continue drafting Cross Examination of William Greene; Continue review of medical records to use as exhibits and incorporate into Cross Examination	1.40	455.00
11/08/2023	SMS: Email correspondence with Paralegal instructing Paralegal to redact prior medicals of Plaintiffs	0.20	65.00
11/09/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about trial preparation	0.10	32.50
11/09/2023	Patrick Gilligan: Begin preparing opening and closing	3	975.00
11/09/2023	SMS: Email correspondence with City Attorney re settlement offer; Review email from Attorney Udell with counter offer and send to City Attorney for review	0.30	97.50
11/09/2023	SMS: Continue review of records recently received for Plaintiff Greene; Begin analyzing distinction between Plaintiffs' exhibits for trial and records in our possession; Continue drafting Cross Examination of Plaintiff Greene	4.50	1,462.50
11/09/2023	SC: Review and respond to email from opposing counsel regarding medical records and trial exhibits; Office conferences with Attorney Sydney Simmons and Attorney Patrick Gilligan regarding trial preparations and potential settlement negotiations	0.50	50.00
11/09/2023	SC: Prepare Trial Subpoenas for Rainey, Williams and Greene; Prepare and send email to Rainey attaching same	0.35	35.00
11/09/2023	SC: Review and respond to email from Attorney Sydney Simmons regarding criminal record for William Greene; Online research regarding same; Follow up office conference with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same	1	100.00
11/09/2023	SC: Review records for Back to Health and Florida Surgery Consultants and create timeline for chiropractic and surgery visits; Calculate chiro visits per year; Office conferences with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same; Prepare and send email to Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same	1.20	120.00
11/09/2023	SC: Review Back to Health records for both plaintiffs excluded by opposing counsel and begin redactions; Office conference with Attorney Pat Gilligan and Attorney Trip Green regarding insurance information for redaction with pending motions in limine	1	100.00
11/09/2023	SC: Continue medical record redactions	1.50	150.00
11/09/2023	SMS: Discussions with Attorney Patrick Gilligan re trial preparation and re strategy for cross exam of Plaintiff Greene	0.40	130.00
11/09/2023	Edwin A. Green, III: Complete preliminary jury instructions; o/c with attorney Sidney Simmons regarding case issues; o/c with attorney Patrick Gilligan regarding case issues and issues for trial; legal research regarding potential special jury instructions; prep of verdict form	4.50	1,462.50
11/10/2023	Patrick Gilligan: Office conference with Attorney Trip Green and Attorney Sydney Simmons about voir dire, Motion in Limine and trial strategy	0.35	113.75
11/10/2023	SMS: Finish review of records for Cross of Plaintiff Greene; Finish relevant research for Cross of Plaintiff Greene; Edit Cross; Send to Attorney Patrick Gilligan for review	1.70	552.50

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DATE	DESCRIPTION	HOURS	AMOUNT
11/10/2023	SMS: Office conference with Attorney Patrick Gilligan and Attorney Edwin Green re trial tasks	0.30	97.50
11/10/2023	SMS: Review records and prepare exhibits for Plaintiff Williams' cross examination	1	325.00
11/10/2023	Edwin A. Green, III: Review, revise and finalize jury instructions and statement of the case to include off duty Police officer language; Prep verdict form; begin prep of voir dire	3	975.00
11/10/2023	Patrick Gilligan: Trial preparation	2	650.00
11/10/2023	SC: Office conferences with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding trial preparations; Office conferences with Paralegal Linda Caldwell and Attorney Trip Green regarding jury selection; Update exhibit e-folders	0.50	50.00
11/10/2023	SC: Review and respond to email from opposing counsel regarding trial exhibits; Phone call with Allison at Udell's office regarding same;	0.20	20.00
11/10/2023	SC: Continue with review of medical records for plaintiffs and compare with exhibits to be used by plaintiffs; Redact same for use at trial	2.70	270.00
11/10/2023	SMS: Review Attorney Patrick Gilligan's redline of Officer Rainey's direct and incorporate changes	0.30	97.50
11/10/2023	SMS: Draft Direct Examination of Elin Kunz; Provide to Attorney Patrick Gilligan for review	2.50	812.50
11/10/2023	SMS: Begin drafting Cross examination of Plaintiff Williams; Begin breakdown of medical records to use as exhibits; Emails to Attorney Patrick Gilligan re same	1	325.00
11/10/2023	SMS: Instructions to Paralegal to provide renewed expert report based on updated medicals; Email correspondence with Attorney Udell re same	0.30	97.50
11/10/2023	SMS: Begin review of case law to support Motions in Limine to be argued at trial	0.30	97.50
11/10/2023	SC: Prepare Notice of Filing for expert depo transcript with exhibits and Plaintiff's Answers to Interrogatories; Prepare depo exhibits for filing with Clerk; Office conference with Attorney Sydney Simmons regarding same; File/serve same	1	100.00
11/10/2023	SC: Continue with review of medical records for plaintiffs and compare with exhibits to be used by plaintiffs; Redact same for use at trial	2.80	280.00
11/11/2023	Edwin A. Green, III: Legal research regarding special jury instructions; prep jury instruction regarding duty of care to all motorists; prep jury instruction regarding reduction in williams damages by percentage of greens comparative fault.; revise verdict form to reflect williams reduction in damages by greens percentage of fault if any; legal research regarding draft of special jury instruction regarding fs 768.042 reduction in damages per recent tort reform law and pending motion in limine; continue prep of voir dire presentation for trial	4	1,300.00
11/11/2023	Patrick Gilligan: Trial preparation; Draft email to Attorney Trip Green about jury instructions for setoff for unclaimed insurance coverage; Finish cross examination outline of William Greene; Finish Cross of Williams; Office conference with Attorney Trip Green about jury instructions	7	2,275.00
11/11/2023	SMS: Discussion with Attorney Patrick Gilligan re tasks for trial; Edit Officer Rainey's cross examination per Attorney Patrick Gilligan redline; Discussion with Attorney Patrick Gilligan re same; Finalize	3	975.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	exhibit folder for same; Edit William Greene's cross examination per Attorney Patrick Gilligan's redline; Finalize exhibits for same; Discussions with Paralegal re presentation of exhibits		
11/11/2023	SMS: Continue preparation of exhibits for Williams' cross examination; Continue records review for use in opening and closing; Discussions with Paralegal re use of trial pad and exhibits	1.80	585.00
11/11/2023	SC: Continue review and redaction of medical record exhibits	2	200.00
11/11/2023	SC: Complete review and redaction of medical record exhibits; Office conferences with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding trial preparations; Begin organization and set up of TrialPad	2.80	280.00
11/12/2023	Edwin A. Green, III: prep and finalize jury instruction regarding duty of care to all motorists; prep and finalize jury instruction regarding reduction in williams damages by percentage of greens comparative fault.; revise verdict form to reflect williams reduction in damages by greens percentage of fault if any; legal research regarding draft of special jury instruction regarding fs 768.042 reduction in damages per recent tort reform law and pending motion in limine; continue prep of voir dire presentation for trial; prep and finalize special jury instruction regarding new 768.042 damages limitation statute; re-format and finalixe jury instructions to reflect instructions in order that they appear in trial	3.50	1,137.50
11/12/2023	Patrick Gilligan: Trial preparation; Office conference with Attorney Trip Green about amended proof of damages statute and Motion in Limine;	0.20	65.00
11/12/2023	Patrick Gilligan: Trial Preparation; Review and revise expert direct; Review and revise Rainey direct examination; Prepare Dr. Cox cross; Prepare Florida Surgical Consultants cross	5	1,625.00
11/12/2023	SMS: Begin edits to Attorney Patrick Gilligan's cross exam for Plaintiff Williams; Begin culling exhibits for Attorney Patrick Gilligan's cross examination of Williams; Discussion with Attorney Patrick Gilligan re edits to direct exam for Elin Kunz and edit direct exam accordingly; Review and respond to email from Plaintiffs' counsel re Plaintiff Greene's hospitalization	2.50	812.50
11/13/2023	Patrick Gilligan: Attend trial for Motion to Continue hearing; finish updating Dr. Cox cross examination for future use; Instructions to Paralegal about contacting witness; Instructions to Attorney Sydney Simmons about determining expert's availability for future trial date; Instructions to Paralegal about getting updated Marion County EMS records for Rachelle Williams; Office conference with Attorney Trip Green about Motion in Limine and collateral source rule	1.30	422.50
11/13/2023	Edwin A. Green, III: Attend hearing on motion for continuance of trial and other issues	0.40	130.00
11/13/2023	SMS: Attend hearing on continuance; Follow up text messages to City Attorney and Officer Rainey re continuation; Email to Elin Kunz re continuation of trial	0.65	211.25
11/13/2023	SC: Office conference with Attorney Sydney Simmons regarding trial to be continued; Review email from Elin Kunz and Attorney Sydney Simmons; Prepare and send email to Elin attaching depo transcript	0.20	20.00
11/13/2023	SC: Update calendar for MIL and Daubert hearing; Prepare and send email to Attorney Sydney Simmons regarding same; Email exchange with Attorney Sydney Simmons and opposing counsel regarding court reporter for same; Follow up call with opposing counsel re court reporter	0.20	20.00

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DATE	DESCRIPTION	HOURS	AMOUNT
11/13/2023	Patrick Gilligan: Review updated Marion County Fire Rescue records; Instructions to Paralegal	0.25	81.25
11/13/2023	Gwen Pasteur Williams: Telephone conference with Attorney Sydney Simmons re hearing on Motions in Limine, Daubert Motion and Response and Continuance; Telephone conference with Attorney Patrick Gilligan re hearing; Email motions to Attorney Sydney Simmons	0.40	130.00
11/13/2023	SC: Email exchange with MCFR records custodian regarding completed report; Review email instruction from Attorney Patrick Gilligan; Review MCFR complete record and redact same; Prepare and send email to opposing counsel attaching same	0.20	20.00
11/13/2023	SMS: Prepare for Motions in Limine to be heard as well as Response to Plaintiffs' Daubert motion	3	975.00
11/13/2023	Patrick Gilligan: Proof Notice of Hearing for Motions in Limine	0.10	32.50
11/13/2023	SC: Review email instruction from Attorney Patrick Gilligan; Prepare NOH on MILs and Daubert; Prepare and send email to Attorney Pat Gilligan attaching same for review and approval	0.40	40.00
11/13/2023	SC: Review email instruction from Attorney Pat Gilligan; Finalize NOH; File and serve same; Update case diary; Prepare and send email to JA attaching copy as requested	0.30	30.00
11/14/2023	SMS: Prepare for and attend hearing; Follow up discussion with Attorney Patrick Gilligan re end result of same and trial continuation date	1.60	520.00
11/14/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons about Motion in Limine hearing	0.35	113.75
11/15/2023	SC: Review Order Denying Plaintiffs Daubert Motion; Prepare and send email to client attaching same; Prepare and send email to expert attaching same; Update case diary	0.25	25.00
11/16/2023	SMS: Email correspondence with Opposing Counsel re new trial term; Discussions with Attorney Patrick Gilligan re same and follow up email to Attorney Trip Green re same	0.40	130.00
11/16/2023	Patrick Gilligan: Office conference with Attorney Sydney Simmons and Attorney Trip Green about their schedules and resetting trial date	0.20	65.00
11/19/2023	Patrick Gilligan: Draft email to Attorney Sydney Simmons about preferred trial date	0.10	32.50
11/20/2023	SMS: Email correspondence with Paralegal instructing Paralegal to provide updated Duke records certifications to Plaintiffs	0.20	65.00
11/20/2023	SMS: Email correspondence with Attorney Udell re trial term; Instruct Paralegal to request case management conference with Judge	0.20	65.00
11/20/2023	SC: Review email instruction from Attorney Sydney Simmons regarding case management conference for new trial date; Prepare and send email to JA requesting dates/times for same; Review auto-reply from JA and forward same to all parties; Update case diary	0.20	20.00
11/21/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare Notice of Filing for Duke Energy Affidavits; Prepare and send email to Attorney Sydney Simmons regarding same	0.30	30.00
11/27/2023	SMS: Review and revise Paralegal's draft Notice of Filing for Duke affidavit and records certification; Email correspondence with Paralegal re same	0.25	81.25
11/28/2023	SC- GPW: Office conference with Attorney Gwen Williams and	0.10	10.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	Attorney Sydney Simmons regarding case status and pending tasks		
11/29/2023	Patrick Gilligan: Read email from Attorney Udell about Case Management Conference date; Instructions to Paralegal	0.10	32.50
11/30/2023	SMS: Email correspondence with Paralegal and with Attorney Patrick Gilligan re case management conference order; Email to Attorney Udell explaining request for later trial term	0.30	97.50
11/30/2023	Patrick Gilligan: Review and Calendar Court's Case Management Conference Hearing Order	0.10	32.50
			Subtotal: 30,672.50

Hours Summary:

- SMS- PGG (SMS): 43.10h @\$325.00 = \$14,007.50
- Patrick Gilligan (Patrick Gilligan): 23.40h @\$325.00 = \$7,605.00
- Edwin A. Green, III (Edwin A. Green, III): 17.40h @\$325.00 = \$5,655.00
- SC- PGG (SC): 32.40h @\$100.00 = \$3,240.00
- Gwen Pasteur Williams (Gwen Pasteur Williams): 0.40h @\$325.00 = \$130.00
- Linda Caldwell (LMC): 0.25h @\$100.00 = \$25.00
- SC- GPW (SC- GPW): 0.10h @\$100.00 = \$10.00

BALANCE DUE

\$30,672.50

Please make checks payable to: Gilligan, Anderson & Phelan, P.A.

Gilligan, Anderson, Phelan, Williams & Green, P.A.

1531 SE 36th Ave.
Ocala, FL 34471
+352 8677707

BILL TO

PMA Management Corp/Risk
Mgmt.
Attn: Senior Account Claims
Representative
2701 North Rocky Pointe Drive
Suite 250
Tampa, FL 33607

INVOICE # 66665

DATE 11/30/2023

MATTER

Melkonian & Secki

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
11/20/2023	SMS: Review draft expert report of Jessica Schmor; Send email to Jessica Schmor approving draft	0.55	178.75
11/28/2023	SC- GPW: Office conference with Attorney Gwen Williams and Attorney Sydney Simmons regarding case status and pending tasks	0.10	10.00
			Subtotal: 188.75
	===== Expenses		
11/06/2023	Sierra Surgical: Medical records		40.00
			Subtotal: 40.00

Hours Summary:

- SMS- PGG (SMS): 0.55h @\$325.00 = \$178.75
- SC- GPW (SC- GPW): 0.10h @\$100.00 = \$10.00

BALANCE DUE

\$228.75

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