

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

1531 SE 36th Ave

Ocala, FL 34471

Risk Management

2701 North Rocky Pointe Drive

Suite 250

Tampa, FL 33607

Date: 10/5/2023

Invoice	Matter	Fees	Expenses	Other	Total
66404	Goff, James	\$2,658.75	\$236.25	\$0.00	\$2,895.00
66405	Williams and Greene (L003434864)	\$2,486.25	\$25.00	\$0.00	\$2,511.25
66406	Melkonian & Secki	\$75.00	\$0.00	\$0.00	\$75.00
66407	Day, James and Joann	\$450.00	\$0.00	\$0.00	\$450.00
66408	American Humanist Assn	\$10.00	\$0.00	\$0.00	\$10.00
66409	Hernandez, Pedro	\$322.50	\$0.00	\$0.00	\$322.50
<i>Total</i>		\$6,002.50	\$261.25	\$0.00	\$6,263.75

Gilligan, Anderson, Phelan & Williams, 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 # 66409**DATE** 09/30/2023**MATTER**

Hernandez, Pedro

CLAIM #

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
09/18/2023	SC- GPW: Email instruction from Attorney Gwen Williams and Attorney Patrick Gilligan; Prepare Notice of Production from Non-Party, Subpoenas for update medical records, HIPAA compliance and Affidavit of Records Custodian; Prepare and send email to Attorney Gwen Williams attaching same for review and approval	0.50	50.00
09/18/2023	SC- GPW: Review email instruction from Attorney Gwen Williams; Revise and finalize Non-Party Production Notice; File and serve same with attached subpoenas and affidavits; Update case diary and calendar date to send out subpoenas after objection period runs	0.25	25.00
09/19/2023	PGG: Draft email to Attorney Gwendolyn P. Williams about discovery concerning updated medical and future care	0.10	32.50
09/19/2023	GPW: Read email from Attorney Patrick Gilligan re further discovery; Email Paralegal Shannon Crandall re drafting interrogatories	0.10	32.50
09/25/2023	SC- GPW: Review email from Attorney Gwen Williams; Prepare Notice of Serving Interrogatories and Interrogatories to Plaintiff; Prepare and send email to Attorney Gwen Williams attaching same for review/approval	0.65	65.00
09/25/2023	SC- GPW: Review email instruction from Attorney Gwen Williams; Revise, finalize, file and serve Notice of Serving 2nd Interrogatories; Revise, finalize and serve 2nd Interrogatories to Plaintiff; Calculate and calendar response deadline; Update case diary; Prepare and send email to client attaching Interrogatories and notice	0.50	50.00
09/25/2023	GPW: Email Paralegal Shannon Crandall re following up on discovery to Plaintiff; Review updated discovery and email Paralegal Shannon Crandall for filing	0.10	32.50
09/29/2023	SC- GPW: Office conference with Attorney Gwen Williams regarding non-party subpoenas; Prepare non-party subpoenas and send out for service; Update case diary; Calendar/task return of medical records	0.35	35.00
			Subtotal: 322.50

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

Hours Summary:	BALANCE DUE	\$322.50
- SC- GPW (SC- GPW): 2.25h @\$100.00 = \$225.00		
- Gwen Pasteur Williams (GPW): 0.20h @\$325.00 = \$65.00		
- Patrick Gilligan (PGG): 0.10h @\$325.00 = \$32.50		

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INVOICE # 66408
DATE 09/30/2023

MATTER
American Humanist Assn

CLAIM #
L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
09/12/2023	SC: Review and respond to status email from Jackie at PMA	0.10	10.00
			Subtotal: 10.00

Hours Summary:

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

BALANCE DUE

\$10.00

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INVOICE # 66407**DATE** 09/30/2023**MATTER**

Day, James and Joann

Claim L003668134

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
09/08/2023	SMS: Review Paralegal Shannon Crandall's draft discovery requests to Plaintiffs related to Peek cemetery plots; Send to Attorney Patrick Gilligan for review; Edit requests pursuant to review by Attorney Patrick Gilligan; Send to Paralegal Shannon Crandall with instructions to finalize and either file or serve same	0.90	292.50
09/08/2023	PGG: Review proposed discovery to Plaintiffs; Draft email to Attorney Sydney Simmons about same	0.30	97.50
09/12/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise and finalize 2nd RTP to James Day and 2nd RTP to Joann Day; Revise and finalize NPNP; File and serve all; Calculate response deadline for 2nd Request to Produce and date to send NPNP subpoenas; Update calendar, task list and case diary	0.60	60.00
			Subtotal: 450.00

Hours Summary:

- SMS- PGG (SMS): 0.90h @\$325.00 = \$292.50
- Patrick Gilligan (PGG): 0.30h @\$325.00 = \$97.50
- SC- PGG (SC): 0.60h @\$100.00 = \$60.00

BALANCE DUE**\$450.00**

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INVOICE # 66406**DATE** 09/30/2023**MATTER**

Melkonian & Secki

Claim L003387896

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
09/01/2023	SMS: Instruct Paralegal to send order continuing trial to Allegiant experts	0.10	32.50
09/03/2023	PGG: Review billing expert invoice; Draft email to Attorney Sydney Simmons about same	0.10	32.50
09/20/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare and send email to Allegiant Experts attaching Order Granting Motion to Continue	0.10	10.00

Subtotal: 75.00

Hours Summary:

- SMS- PGG (SMS): 0.10h @\$325.00 = \$32.50
- Patrick Gilligan (PGG): 0.10h @\$325.00 = \$32.50
- SC- PGG (SC): 0.10h @\$100.00 = \$10.00

BALANCE DUE**\$75.00**

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INVOICE # 66405**DATE** 09/30/2023**MATTER**

Williams and Greene (L003434...

Claim L003434864

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
09/01/2023	PGG: Office conference with Attorney Sydney Simmons about billing expert opinion	0.20	65.00
09/01/2023	PGG: Review and Calendar new Pretrial Conference date	0.10	32.50
09/01/2023	SC: Review email from Attorney Sydney Simmons regarding ORMC Billing needed for billing expert; Office conference with Attorney Sydney Simmons regarding same; Review email instruction to Attorney Patrick Gilligan; Prepare and send email to opposing counsel requesting billing records from ORMC	0.25	25.00
09/01/2023	SC: Review Order Rescheduling Pretrial Conference received from Judge Sanders; Email exchange with Attorney Patrick Gilligan and update calendar regarding same	0.20	20.00
09/01/2023	SMS: Zoom conference with Allegiant experts re medical bills summary; Follow up with Attorney Patrick Gilligan re same	0.60	195.00
09/18/2023	SMS: Review and approve draft amended Pretrial Statement; Email correspondence and follow up discussion with Paralegal re filing same	0.35	113.75
09/18/2023	SMS: Email to Expert re report and follow up telephone conference with Expert re same	0.30	97.50
09/18/2023	SC: Review and respond to email from Attorney Patrick Gilligan regarding Pretrial Statement deadline	0.10	10.00
09/18/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare Second Amended Pretrial Statement; Prepare and send email to Attorney Sydney Simmons attaching same for review	0.50	50.00
09/18/2023	SC: Review email instruction from Attorney Sydney Simmons regarding Pretrial Compliance; Follow up office conference with Attorney Sydney Simmons regarding same; Revise and finalize Pretrial Compliance; File and serve same; Update case diary	0.60	60.00
09/20/2023	PGG: Office conference with Attorney Sydney Simmons about trial preparation and billing expert report	0.20	65.00
09/25/2023	SC: Review email from Elin at Allegiant Experts; Read and review	0.50	50.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	expert report and attachments to same; Review and respond to email instruction from Attorney Sydney Simmons; Update case diary		
09/25/2023	GPW: Office conference with Attorney Sydney Simmons re upcoming pretrial conference and attendance for same; Office conference with Attorney Patrick Gilligan re same	0.20	65.00
09/26/2023	PGG: Prepare and attend Pretrial Conference; Office conference with Attorney Sydney Simmons about trial preparation	0.40	130.00
09/26/2023	SMS: Case status meeting with Paralegal to confirm receipt of all records and to see what records need to be reviewed; Begin review of casemap for case to determine trial strategy; Attend pretrial conference with Attorney Patrick Gilligan; Follow up with Attorney Patrick Gilligan to decipher tasks for trial	0.50	162.50
09/26/2023	SMS: Review updated records sent from Plaintiffs' healthcare providers to include Back to Health; Continue casemapping same; Begin drafting timeline for use at trial; Review expert report; Email to Attorney Patrick Gilligan re use of same	1.50	487.50
09/26/2023	SC: Review email from Attorney Sydney Simmons; Review medical records rec'd; Review pending subpoenas and status of records; Office conference Attorney Sydney Simmons regarding medical records not received; Calls to facilities (4) for status of records along with follow up emails (2) and fax (1) regarding same; Medical records status meeting with Attorney Sydney Simmons	2.50	250.00
09/26/2023	SC: Review status of compliance to Request for Copies; Phone conference with Attorney Sydney Simmons regarding update Back to Health records and Florida Surgery Consultants records; Call to Florida Surgery Consultants; Prepare and send email to same	0.50	50.00
09/27/2023	SMS: Email to Attorney Patrick Gilligan and Paralegal Shannon Crandall re trial tasks and things to start doing to prepare for trial	0.30	97.50
09/27/2023	SMS: Review and respond to email from Paralegal re compliance with Request for Copies; Revise Compliance notice and send to Paralegal for filing	0.25	81.25
09/27/2023	SC: Review Request for Copies from Plaintiffs and compare with records received and previously provided to Plaintiffs; Prepare Notice of Compliance with Request for Copies; Prepare and send email to Attorney Sydney Simmons and Attorney Patrick Gilligan attaching same for review and approval	0.60	60.00
09/27/2023	SC: Prepare records for delivery to attorney for plaintiffs via Dropbox; Prepare and send email to opposing counsel with link to Dropbox	0.25	25.00
09/27/2023	SC: Review email from Attorney Sydney Simmons; Revise and finalize Notice of Compliance with Request for Copies; File and serve same; Update case diary; Prepare and send email to client attaching same with link to records	0.50	50.00
09/28/2023	SMS: Begin gathering information needed for examinations of witnesses at trial; Begin drafting timeline of important medical records for use at trial and for examinations	0.75	243.75
			Subtotal: 2,486.25
	===== Expenses		
09/27/2023	El Rio Health: Medical records		25.00
			Subtotal: 25.00

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Hours Summary:	BALANCE DUE	\$2,511.25
- SMS- PGG (SMS): 4.55h @\$325.00 = \$1,478.75		
- SC- PGG (SC): 6.50h @\$100.00 = \$650.00		
- Patrick Gilligan (PGG): 0.90h @\$325.00 = \$292.50		
- Gwen Pasteur Williams (GPW): 0.20h @\$325.00 = \$65.00		

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INVOICE # 66404**DATE** 09/30/2023**MATTER**

Goff, James

Claim L002882111

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
09/01/2023	PGG: Office conference with Attorney Sydney Simmons about McMurry deposition and Motion to Compel about same to his Deposition	0.20	65.00
09/01/2023	GPW: Office conferences with Attorney Sydney Simmons re outcome of deposition, next steps and strategy of case	0.50	162.50
09/01/2023	SMS: Follow up discussion with Attorney Patrick Gilligan re deposition of Alan MacMurray; Review photographs used as exhibits and discuss with Paralegal Shannon Crandall and Attorney Gwendolyn Williams	0.50	125.00
09/01/2023	SMS: Review Plaintiff's Objection to Notice of Nonparty Production to Precision Sidewalk	0.10	32.50
09/03/2023	PGG: Review objection to Notice of Production from Non-Party to Precision Sidewalks; Draft email to Attorney Sydney Simmons about same	0.10	32.50
09/05/2023	SC: Review Notice of Taking Deposition of Tom Raulerson; Review Notice of Taking Deposition Duces Tecum of Sean Lanier; Update calendar entries and add Mr. Lanier and Mr. Raulerson to same; Prepare and send email to Sean Lanier regarding deposition being duces tecum; Update case diary	0.40	40.00
09/05/2023	SMS: Office conference with Attorney Patrick Gilligan re Plaintiff's Objection to NPNP to Precision for employee file; Follow up email to Attorney Tim Babiarz re basis for objection	0.30	97.50
09/06/2023	PGG: Read email from Attorney Babiarz about his objection to Notice of Production from Non-Party; Draft email to Attorney Sydney Simmons about motion to overrule objection	0.10	32.50
09/06/2023	SMS: Research rules for compelling deposition response from non-party; Begin drafting Letter to Attorney Killinger and Motion to Compel	0.60	195.00
09/06/2023	SMS: Email correspondence with Attorney Babiarz re amending subpoena to Precision Sidewalk Safety; Instruct Paralegal to edit	0.30	97.50

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DATE	DESCRIPTION	HOURS	AMOUNT
	NPNP to Precision and send for review		
09/07/2023	SMS: Review email from Attorney Babiarz' office re setting deposition of Dr. Cannon; Instruct Paralegal re coordinating same	0.20	65.00
09/07/2023	SMS: Finalize draft of letter to Attorney Brad Killinger re good faith effort to resolve dispute as to deposition objections; Send to Attorney Patrick Gilligan for review	0.45	146.25
09/07/2023	PGG: Read email from Attorney Babiarz about objection to Notice of Production from Non-Party for fact witness information; Draft email to Attorney Sydney Simmons about same and deposition of Dr. Cannon	0.10	32.50
09/07/2023	SC: Office conference with Attorney Patrick Gilligan regarding Return of Service for Lee Falcon; Review email from Attorney Sydney Simmons regarding deposition of Dr. Cannon; Review email instruction from Attorney Patrick Gilligan regarding scheduling of same; Review and respond to email from Jennifer at Babiarz office regarding availability for Dr. Cannon's deposition; Schedule same	0.30	30.00
09/07/2023	SC: Review email exchange with Attorney Babiarz and Attorney Sydney Simmons; Review email instruction from Attorney Sydney Simmons; Prepare Amended Non-Party Production Notice and Amended Subpoena to PSSC; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval	0.30	30.00
09/07/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise and finalize good faith letter to Attorney Killinger; Prepare and send email to Attorney Killinger attaching good faith letter; Calendar response deadline; Update case diary	0.30	30.00
09/07/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise and finalize Non-Party Production Notice; File and serve same; Prepare and send email to Attorney Babiarz regarding objection	0.50	50.00
09/07/2023	SC: Review email from court reporter and attached depo transcripts from depo of Alan MacMurray; Review and save same; Prepare and send email to Attorney Sydney Simmons regarding same	0.20	20.00
09/08/2023	SC: Review Notice of Taking Deposition (Dr. Cannon) from Babiarz; Update calendar	0.10	10.00
09/11/2023	SC: Review email response from Atty Killinger's office regarding address for Lee Falcon; Prepare and send email to Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same	0.10	10.00
09/11/2023	SMS: Review email from Attorney Killinger's office with address for Lee Falcon; Instruct Paralegal to prepare subpoena for same	0.20	65.00
09/12/2023	SC: Review email from Jennifer at Babiarz office with information regarding depo of Dr. Cannon; Update calendar	0.10	10.00
09/12/2023	SC: Office conference with Attorney Sydney Simmons regarding email response from Attorney Killinger's office; Email exchange with Attorney Sydney Simmons regarding depo location; Email exchange with Attorney Patrick Gilligan regarding work location of witness	0.20	20.00
09/18/2023	SMS: Email correspondence with Paralegal Shannon Crandall and Attorney Patrick Gilligan re expert for city for trial and tasks for same	0.25	81.25
09/18/2023	PGG: Review Plaintiff's expert disclosure; Draft email to Paralegal and Attorney Sydney Simmons about possible human factors expert	0.35	113.75
09/18/2023	SC: Review and respond to email from Attorney Patrick Gilligan regarding expert witness list deadline	0.10	10.00
09/18/2023	SC: Review Plaintiff's Expert Disclosure; Prepare and send email to Attorney Patrick Gilligan regarding discovery requests	0.20	20.00

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DATE	DESCRIPTION	HOURS	AMOUNT
09/18/2023	SC: Review email instruction from Attorney Patrick Gilligan; Prepare Expert Interrogatories to Plaintiff, Notice of Serving Expert Interrogatories and First Request to Produce (Expert); Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.75	75.00
09/18/2023	SC: Review email instruction from Attorney Sydney Simmons regarding scheduling of deposition of Lee Falcon; Prepare and send email to Jennifer at Babiarz office to confirm date/time	0.10	10.00
09/19/2023	PGG: Proof expert discovery to Plaintiff	0.25	81.25
09/19/2023	PGG: Research hiring of human factors expert	0.35	113.75
09/20/2023	PGG: Office conference with Attorney Sydney Simmons about hiring human factors expert	0.10	32.50
09/20/2023	SMS: Email correspondence with Paralegal re new date for deposition of Lee Falcon	0.10	32.50
09/20/2023	SC: Review email instruction from Attorney Patrick Gilligan; Revise and finalize Notice of Serving Expert Interrogatories, Expert Interrogatories and Expert Request to Produce; File and serve same; Calendar due date; Update case diary; Prepare and send email to client attaching same	0.60	60.00
09/20/2023	SC: Review email instruction from Attorney Sydney Simmons; Email exchange with Jennifer at Babiarz office regarding depo date/time for depo of Lee Falcon; Update calendar; Prepare Re-Notice of Taking Deposition and Subpoena for Deposition; Prepare and send email to Attorney Sydney Simmons attaching same for review/approval	0.50	50.00
09/21/2023	SMS: Telephone conference with Attorney Babiarz re potential for settlement; Follow up email to City re same	0.40	130.00
09/21/2023	SC: Review and respond to email from Attorney Sydney Simmons re Subpoena for Deposition; Revise and finalize Subpoena	0.20	20.00
09/23/2023	SC: Prepare and send email to process server attaching subpoena for service on Lee Falcon; Update case diary	0.10	10.00
09/26/2023	SMS: Discussion with Paralegal re Plaintiff's witness disclosure and due date for City's	0.20	65.00
09/26/2023	SC: Review Plaintiff's Witness List; Update case diary; Review Case Map and non-party records and begin City Witness List and Expert Witness List; Review PSSC report and Google views of sidewalks in area in comparison to report; Review MCFR and OFD run reports and records	1.50	150.00
09/27/2023	SMS: Office conference with Paralegal re witness list; Email to Paralegal and Attorney Patrick Gilligan re status of same	0.20	65.00
09/27/2023	SC: Office conference with Attorney Sydney Simmons regarding experts for witness list; Prepare and send follow up email to Attorney Patrick Gilligan regarding human factors expert	0.10	10.00
09/28/2023	SMS: Review and respond to email from Client's office re setting meeting to discuss case status; Discussion with Attorney Patrick Gilligan re next tasks for case	0.25	81.25
09/28/2023	PGG: Office conference with Attorney Sydney Simmons about settlement conference with City Attorney Will Sexton and Richard Dennis	0.15	48.75
			Subtotal: 2,658.75
===== Expenses			
09/08/2023	Owen & Associates: Transcript for depo of Alan MacMurray		236.25

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DATE	DESCRIPTION	HOURS	AMOUNT
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Subtotal: 236.25

Hours Summary:

- SMS- PGG (SMS): 4.05h @\$315.74 = \$1,278.75
- SC- PGG (SC): 6.55h @\$100.00 = \$655.00
- Patrick Gilligan (PGG): 1.70h @\$325.00 = \$552.50
- Gwen Pasteur Williams (GPW): 0.50h @\$325.00 = \$162.50
- SC- CAA (SC): 0.10h @\$100.00 = \$10.00

BALANCE DUE

\$2,895.00

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