

Gilligan, Anderson & Phelan, P.A.
1531 SE 36th Ave
Ocala, FL 34471

Risk Management
2701 North Rocky Pointe Drive
Suite 250
Tampa, FL 33607

Date: 5/6/2022

Invoice	Matter	Fees	Expenses	Amount
64757	American Humanist Assn	\$98.00	\$0.00	\$98.00
64758	Clifton, Talia	\$2,021.25	\$0.00	\$2,021.25
64759	Forsyth-JJ	\$3,258.50	\$0.00	\$3,258.50
64760	Goff, James	\$6,174.00	\$0.00	\$6,174.00
64761	Hernandez, Pedro	\$1,016.75	\$0.00	\$1,016.75
64764	Melkonian and Secki	\$196.00	\$0.00	\$196.00
64762	L003358033- Brown, William Samuel (L003358033)	\$649.25	\$0.00	\$649.25
64763	L003434864- Williams and Greene	\$2,094.75	\$12.00	\$2,106.75
<i>Total</i>		\$15,508.50	\$12.00	\$15,520.50

Gilligan, Anderson & Phelan, P.A.

1531 SE 36th Ave.
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+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 # 64757**DATE** 04/30/2022**MATTER**

American Humanist Assn

CLAIM #

L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/27/2022	PGG: Read and respond to email from Attorney Southerland about oral argument	0.10	24.50
04/29/2022	PGG: Telephone conference with Mayor Guinn about oral argument	0.30	73.50

Subtotal: 98.00

Hours Summary:

- Patrick Gilligan (PGG): 0.40h @\$245.00 = \$98.00

BALANCE DUE**\$98.00**

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INVOICE # 64758**DATE 04/30/2022****MATTER**

Clifton, Talia

CLAIM #

L002678511

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/18/2022	PGG: Read and respond to email from Plaintiff's Attorney about rescheduling Deposition of Plaintiff; Telephone conference with Carolyn Goodwine about issue; Draft second email to Plaintiff's counsel about what emergency is; Telephone conference with Carolyn Goodwine about same; Draft email to Plaintiff's Attorney about necessity of filing a motion with the court; Telephone conference with Plaintiff's attorney Paralegal about having counsel appear via Zoom; Office conference with Paralegal about setting up Deposition to accommodate Plaintiff's Attorney Zoom appearance	0.80	196.00
04/18/2022	PGG: Office conference with Paralegal about Deposition preparation; Review documents in preparation for mediation	1	245.00
04/18/2022	GPW: Office conferences with City Paralegal Shannon Crandall re casemap report and fields needed and re outcome of informal investigation re other traffic accidents	0.30	73.50
04/19/2022	PGG: Prepare for and attend deposition of Plaintiff; Telephone conference with Carolyn Goodwine about same and Plaintiff's reduced demand	2.40	588.00
04/19/2022	PGG: Proof and revise Notice of Production from Non-Party and Fourth Interrogatories to Plaintiff	0.35	85.75
04/19/2022	SMS: Follow up discussions with Attorney Patrick Gilligan and Paralegal Shannon Crandall re strategy for deposition	0.20	49.00
04/20/2022	PGG: Telephone conference with Carolyn Goodwine about settlement negotiations with Plaintiff's attorney (0419/22); Office conference with Attorney Sydney Simmons about reviewing medical records and identifying same for Plaintiff's explanation of accident to send to Carolyn Goodwine for use in settlement negotiation; Office conference with Attorney Sydney Simmons about additional evidence of conflicting statements in Plaintiff's medical records	0.80	196.00
04/20/2022	PGG: Office conference with Paralegal about constructing timeline on cell phone calls from Plaintiff and Officer report of accident to	0.50	122.50

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DATE	DESCRIPTION	HOURS	AMOUNT
	dispatch; Read email from Paralegal about reporting from Officer and CAD reports; Update case diary		
04/20/2022	SMS: Office conference with Attorney Patrick Gilligan and Paralegal Shannon Crandall re follow up tasks after deposition; Review documents contradicting Plaintiff testimony; Extract documents and prepare to send to Carolyn Goodwine for use; Draft email with description of documents and send the same	1.30	318.50
04/20/2022	SMS: Review and respond to emails from Paralegal Shannon Crandall and Attorney Patrick Gilligan re new interrogatories and NPNP;	0.20	49.00
04/20/2022	SMS: Edit Paralegal Shannon Crandall's draft Request for Admissions; Send to Attorney Patrick Gilligan for review	0.30	73.50
04/22/2022	PGG: Update case diary for Request for Admissions and status of settlement negotiations	0.10	24.50
			Subtotal: 2,021.25
	===== Services (Not Billed)		
04/19/2022	SMS: Attend deposition of Plaintiff	1.60	0.00
			Subtotal: 0.00

Hours Summary:

- Patrick Gilligan (PGG): 5.95h @\$245.00 = \$1,457.75
- SMS- PGG (SMS): 2.00h @\$245.00 = \$490.00
- GPW- PGG (GPW): 0.30h @\$245.00 = \$73.50

BALANCE DUE

\$2,021.25

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INVOICE # 64759**DATE** 04/30/2022**MATTER**

Forsyth-JJ

CLAIM #

L001430074

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/04/2022	PGG: Read email from Attorney McClellan about expert fees; Draft email to Chris Watt about same	0.20	49.00
04/07/2022	PGG: Draft email to Attorney King about Release and payment	0.10	24.50
04/11/2022	PGG: Review executed release; Instructions to Paralegal about getting executed by City and officer; Update case diary for Motion for Final Judgment against Plaintiff	0.15	36.75
04/11/2022	SMS: Discussion with Attorney Patrick Gilligan re drafting Motion for Entry of Final Judgment for Fees; Review relevant pleadings in file; Review drafted Release regarding attorney fees; Draft Motion for Entry of Final Judgment; Send to Attorney Patrick Gilligan for review	1.70	416.50
04/11/2022	PGG: Office conference with Attorney Sydney Simmons about Motion for Final Judgment against Plaintiff	0.15	36.75
04/12/2022	PGG: Review and revise Motion for Final Judgment against Plaintiff; Read and respond to email from Carolyn Goodwine about release; Read and respond to email from Attorney King about payment; Revise Final Judgment	0.70	171.50
04/12/2022	SMS: Review Attorney Patrick Gilligan's edits to Motion for Entry of Final Judgment; Discussion with Attorney Patrick Gilligan re drafting Proposed Final Judgment on Fees; Draft the same; Send to Attorney Patrick Gilligan for review; Follow up discussion with Attorney Patrick Gilligan re same	1.50	367.50
04/13/2022	PGG: Instructions to Paralegal about changes to proposed Final Judgment and locating address for Plaintiff to put in Final Judgment	0.10	24.50
04/14/2022	SMS: Review of Proposed Final Judgment for Motion for Entry of Final Judgment; Email to Attorney Patrick Gilligan and Paralegal Shannon Crandall re same	0.30	73.50
04/14/2022	PGG: Office conference with Paralegal about language in Final Judgment	0.10	24.50
04/14/2022	PGG: Review fully executed release; Instructions to Paralegal to send copy to Risk and opposing counsel	0.10	24.50

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DATE	DESCRIPTION	HOURS	AMOUNT
04/27/2022	PGG: Review response to Motion for Attorney's Fees against Personal Representative; Office conference with Attorney Sydney Simmons about Reply	0.50	122.50
04/27/2022	SMS: Office conferences with Attorney Patrick Gilligan and Attorney Christopher Anderson re drafting Reply to Response to Motion for Entry of Final Judgment; Begin review of research for Reply; Begin drafting same	0.60	147.00
04/28/2022	CAA: Review email from Attorney Sydney Simmons about case for response to motion for attorneys' fees; Review related cases; Office conference with Attorney Sydney Simmons about same	1.10	269.50
04/28/2022	SMS: Review Attorney Christopher Anderson's research re awards of attorney fees; Research the same for draft of Reply to Response to Motion for Final Judgment; Begin drafting the same; Follow up discussion with Attorney Christopher Anderson re same	4.30	1,053.50
04/29/2022	SMS: Continue drafting Reply to Response to Motion for Final Judgment for Fees; Continue case analysis for same	1.70	416.50
			Subtotal: 3,258.50

Hours Summary:

- SMS- PGG (SMS): 10.10h @\$245.00 = \$2,474.50
- Patrick Gilligan (PGG): 2.10h @\$245.00 = \$514.50
- Christopher Anderson (CAA): 1.10h @\$245.00 = \$269.50

BALANCE DUE

\$3,258.50

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INVOICE # 64760**DATE** 04/30/2022**MATTER**

Goff, James

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/04/2022	PGG: Read email from Attorney Babiarz about discovery responses and HIPPA releases to get records; Draft email to him about updating privilege log; Draft emails to Attorney Sydney Simmons about Motion to Compel for sidewalk pictures and necessity of supporting affidavit	1	245.00
04/04/2022	SMS: Discussions with Attorney Patrick Gilligan re research on and drafting Motion to Compel; Research standard for compelling potential work product; Email research to Attorney Patrick Gilligan and discuss potential affidavit draft with same	1.40	343.00
04/05/2022	PGG: Review proposed HIPPA releases for Plaintiff's execution to get out-of-state medical records; Instructions to Paralegal; Review Google Earth photos of scene	0.35	85.75
04/05/2022	PGG: Update Casemap; Proof additional HIPPA releases; Instructions to Paralegal about getting executed	0.50	122.50
04/05/2022	SMS: Telephone conferences with individuals from Engineering and Public Works to discuss affidavit for Motion to Compel; Review email correspondence from City Darren Park and City Paul Constable re pictures; Begin drafting Motion to Compel and corresponding affidavits	1.40	343.00
04/05/2022	GPW: Office conference with Attorney Sydney Simmons re questions on facts of case and Motion to Compel	0.20	49.00
04/07/2022	SMS: Finish drafting Motion to Compel; Review file to prepare affidavits in support of Motion; Draft two affidavits in support of Motion to Compel; Send Motion and affidavits to Attorney Patrick Gilligan for review; Follow up discussion with Attorney Patrick Gilligan re same	1.70	416.50
04/07/2022	PGG: Office conference with Attorney Sydney Simmons about Motion in Limine and Motion to Compel for sidewalk pictures and how to frame affidavit	0.35	85.75
04/07/2022	SMS: Begin researching subsequent remedial measures	0.40	98.00

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DATE	DESCRIPTION	HOURS	AMOUNT
04/14/2022	SMS: Begin draft of Motion in Limine re subsequent remedial measures; Review images and other items in file to support Motion; Research standard for Motion in Limine for subsequent remedial measures; Finish drafting Motion in Limine; Edit the same; Send to Attorney Patrick Gilligan and Attorney Gwendolyn Williams for review; Update case diary	2.60	637.00
04/14/2022	PGG: Review medical records and photographs; Update Casemap	0.40	98.00
04/18/2022	PGG: Proof and revise Motion to Compel as to Plaintiff's scene photographs; Proof supporting affidavits; Instructions to Paralegal; Proof and revise Motion in Limine; Instructions to Paralegal	0.70	171.50
04/18/2022	SMS: Review Attorney Patrick Gilligan's edits to Motion to Compel and emails re finalizing affidavits in support of Motion; Email Darren Park and Paul Constable re review of affidavits and scheduling execution of same	0.30	73.50
04/18/2022	SMS: Begin review of documents received in discovery; Begin casemap	4.30	1,053.50
04/19/2022	SMS: Review email from Paul Constable re changes to affidavit in support of Motion to Compel; Telephone conference with Paul Constable re same; Review documents sent to opposing counsel in Public Records Request; Review file and casemap to confirm timeline of events re sidewalk; Instructions to Paralegal Shannon Crandall re documents in file; Discussion with Attorney Patrick Gilligan re strategy for edits to Motion to Compel	1.10	269.50
04/19/2022	SMS: Continue Casemapping discovery	0.70	171.50
04/19/2022	PGG: Office conference with Attorney Sydney Simmons about timeline on City repairs, photographs and Motion to Compel	0.50	122.50
04/19/2022	SMS: Edits to Motion to Compel based on conversation of timeline with Paul Constable	0.40	98.00
04/20/2022	SMS: Finalize changes to Engineering Affidavit for Motion to Compel; Send to Attorney Patrick Gilligan for review; Finalize changes to Motion to Compel; Send to Attorney Patrick Gilligan for review; Casemap emails and documents; Follow up discussion with Attorney Patrick Gilligan re strategy; Follow up discussion with Attorney Patrick Gilligan and Paralegal Shannon Crandall re Request for Admissions	1.60	392.00
04/20/2022	PGG: Review revised affidavit in support of Motion to Compel	0.10	24.50
04/20/2022	PGG: Proof Motion to Compel; Instructions to Paralegal about filing after affidavits attached	0.20	49.00
04/21/2022	SMS: Finalize review of discovery and all documents received for case; Analyze and organize in Casemap; Discussion with Attorney Patrick Gilligan re same; Email to Attorney Patrick Gilligan and Paralegal Shannon Crandall re status of Casemap; Follow up discussion with Attorney Patrick Gilligan re photographs of scene; Edit Motion to Compel to incorporate information re photographs received from Plaintiff	2.60	637.00
04/21/2022	SMS: Email correspondence with Paul Constable re approval of Affidavit for Motion to Compel and executing same; Convert Affidavit to PDF and send to Paul Constable for execution	0.20	49.00
04/22/2022	SMS: Review email correspondence re Engineering Affidavit; Instructions to Paralegal Shannon Crandall re preparing Exhibit for Motion to Compel	0.20	49.00
04/25/2022	SMS: Email correspondence with Darren Park re approval of affidavit in support of Motion to Compel; Finalize affidavit and send	0.40	98.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	to Darren Park for execution		
04/26/2022	SMS: Review executed affidavit in support of Motion to Compel from Darren Park; Email correspondence re same; Email instructions to Paralegal Shannon Crandall re converting exhibits and finalizing Motion to Compel	0.30	73.50
04/26/2022	SMS: Continue drafting Motion in Limine re sidewalk repairs	0.80	196.00
04/27/2022	PGG: Proof Motion to Compel; Instructions to Paralegal; Update case diary	0.20	49.00
04/27/2022	SMS: Review Paralegal Shannon Crandall's edits to Motion to Compel; Edit the same; Instructions to Paralegal Shannon Crandall re filing same	0.30	73.50
			Subtotal: 6,174.00

Hours Summary:

- SMS- PGG (SMS): 20.70h @\$245.00 = \$5,071.50
- Patrick Gilligan (PGG): 4.30h @\$245.00 = \$1,053.50
- GPW- PGG (GPW): 0.20h @\$245.00 = \$49.00

BALANCE DUE

\$6,174.00

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INVOICE # 64761**DATE** 04/30/2022**MATTER**

Hernandez, Pedro

CLAIM #

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/05/2022	PGG: Draft email to Paralegal about expert Deposition; Read and respond to email from her about expert fee schedule; Proof and revise duces tecum Deposition notice; Update case diary	0.35	85.75
04/11/2022	PGG: Read and respond to email from Chris Watt about Motion for Summary Judgment and deposition of expert	0.35	85.75
04/13/2022	PGG: Instructions to Paralegal about expert Deposition fees; Read email from Paralegal and Carolyn Goodwine about payment of expert fees	0.10	24.50
04/18/2022	PGG: Review Mediation Notice; Office conference with Paralegal about being scheduled as a Zoom mediation	0.25	61.25
04/19/2022	PGG: Review mediation notice and email from Plaintiff's counsel about correcting notice for in-person mediation	0.10	24.50
04/19/2022	PGG: Review updated mediation notice; Instructions to Paralegal	0.10	24.50
04/27/2022	GPW: Begin review of deposition transcripts and continue drafting Motion for Summary Judgment for incorporation of same; Continue drafting Affidavits of Jeff Kerley and begin drafting affidavits of other Recreation and Parks employees; Telephone conference with Attorney Patrick Gilligan re same and re strategy moving forward	2.90	710.50

Subtotal: 1,016.75

Hours Summary:

- GPW- PGG (GPW): 2.90h @\$245.00 = \$710.50
- Patrick Gilligan (PGG): 1.25h @\$245.00 = \$306.25

BALANCE DUE**\$1,016.75**

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INVOICE # 64762**DATE** 04/30/2022**MATTER**

Brown, William Samuel (L0033...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/13/2022	PGG: Office conference with Paralegal about trial docket and selection of trial date	0.15	36.75
04/14/2022	PGG: Instructions to Paralegal about selection of mediator	0.10	24.50
04/14/2022	PGG: Read and respond to email from about discovery needed before mediation	0.35	85.75
04/14/2022	PGG: Review medical records; update Casemap; Instructions to Paralegal about getting brain MRI	1	245.00
04/15/2022	PGG: Office conference with Paralegal about records needed to prepare for mediation	0.35	85.75
04/18/2022	PGG: Proof Stipulation for trial date; Instructions to Paralegal about correct trial date; Update case diary	0.25	61.25
04/27/2022	PGG: Prepare and attend Case Management Conference and set trial date; Instructions to Paralegal about mediation	0.25	61.25
04/27/2022	PGG: Office conference with Paralegal about scheduling mediation and Plaintiff's Deposition; Read email from Plaintiff's Attorney about same	0.20	49.00

Subtotal: 649.25

Hours Summary:

- Patrick Gilligan (PGG): 2.65h @\$245.00 = \$649.25

BALANCE DUE**\$649.25**

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INVOICE # 64763**DATE** 04/30/2022**MATTER**

Williams and Greene

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/21/2022	SMS: Discussion with Paralegal Shannon Crandall re new Complaint; Review pleadings filed; Review and edit Paralegal Shannon Crandall's draft Answer to Complaint; Revise and draft Affirmative Defenses for same; Send to Attorney Patrick Gilligan for review	0.80	196.00
04/21/2022	PGG: Review complaint and initial discovery; Update case diary; Instructions to Paralegal	0.50	122.50
04/22/2022	SMS: Review Discovery requests from Plaintiff; Begin drafting answers to the same; Research on appropriate responses to Requests for Admissions; Discussion with Attorney Patrick Gilligan re same; Email correspondence with Attorney Patrick Gilligan and Paralegal Shannon Crandall re meeting to go over discovery responses	1.60	392.00
04/22/2022	PGG: Office conference with Attorney Sydney Simmons about response to Request for Admissions	0.20	49.00
04/22/2022	PGG: Review and revise answer to complaint	0.40	98.00
04/22/2022	SMS: Begin drafting Initial Discovery to Plaintiff	0.70	171.50
04/26/2022	SMS: Discussion with Paralegal Shannon Crandall re tasks; Brief research on timeframe for lawsuit; Send research to Paralegal Shannon Crandall with instructions	0.20	49.00
04/26/2022	PGG: Review Traffic Accident Form; Office conference with Paralegal about cause of accident	0.15	36.75
04/26/2022	SMS: Review Traffic Accident Report; Email correspondence re same; Schedule telephone conference with Officer Rainey; Edit Answer per Traffic Accident Report; Follow up discussion with Attorney Patrick Gilligan re same	0.50	122.50
04/26/2022	SMS: Telephone conference with Officer Rainey re incident; Telephone conference with Carolyn Goodwine re same	0.60	147.00
04/27/2022	SMS: Email correspondence with Carolyn Goodwine re sending Risk file	0.10	24.50

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DATE	DESCRIPTION	HOURS	AMOUNT
04/27/2022	SMS: Review edits to Answer and make new edits per conversations with City and documents received; Email to Attorney Patrick Gilligan re same	0.30	73.50
04/27/2022	SMS: Office conferences with Attorney Patrick Gilligan about individual officer liability and negotiated release to include officer if case settled; Draft email to Carolyn Goodwine for Attorney Patrick Gilligan's approval discussing potential release of officer; Edit per Attorney Patrick Gilligan's edits; Send email to Carolyn Goodwine and others at City; Follow up telephone conference with Chris Watt re same	0.95	232.75
04/27/2022	PGG: Office conferences with Attorney Sydney Simmons about individual officer liability and negotiated release to include officer if case settled	0.50	122.50
04/28/2022	PGG: Review intersection photo; Instructions to Paralegal to get Google Earth view of intersection and determine property owner of roads for possible Fabre defense; Office conference with Attorney Sydney Simmons about review of scene photographs and Fabre defense	0.35	85.75
04/28/2022	SMS: Review email from Officer Rainey; Email to Attorney Patrick Gilligan and Paralegal Shannon Crandall re photo and with instructions; Pull google earth view and save pictures of accident scene to file; Email correspondence re same and re ownership of road	0.50	122.50
04/28/2022	PGG: Read email from Chris Watt about coverage issue in complaint; Draft email to him about issue	0.20	49.00
			Subtotal: 2,094.75
===== Expenses			
04/26/2022	DHSMV: Purchase crash report from FHP		12.00
			Subtotal: 12.00
Hours Summary:			
- SMS- PGG (SMS): 6.25h @\$245.00 = \$1,531.25			
- Patrick Gilligan (PGG): 2.30h @\$245.00 = \$563.50			
BALANCE DUE			\$2,106.75

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INVOICE # 64764**DATE** 04/30/2022**MATTER**

Melkonian and Secki

CLAIM #

L003387896

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/29/2022	PGG: Review complaint; Instructions to Paralegal about initial review and handling	0.50	122.50
04/29/2022	SMS: Instructions to Paralegal Shannon Crandall re calendaring dates; Review other email correspondence re case and documents received	0.30	73.50

Subtotal: 196.00

Hours Summary:

- Patrick Gilligan (PGG): 0.50h @\$245.00 = \$122.50
- SMS- PGG (SMS): 0.30h @\$245.00 = \$73.50

BALANCE DUE**\$196.00**

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