

**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: 1/7/2022

<b>Invoice</b>	<b>Matter</b>	<b>Fees</b>	<b>Expenses</b>	<b>Amount</b>
61668	Garcia de Sanchez, Jourdan	\$36.75	\$0.00	\$36.75
64321	American Humanist Assn	\$49.00	\$0.00	\$49.00
64322	Clifton, Talia	\$2,535.75	\$620.50	\$3,156.25
64323	Forsyth-JJ	\$2,891.00	\$0.00	\$2,891.00
64324	Goff, James	\$257.25	\$0.00	\$257.25
64325	Hernandez, Pedro	\$1,041.25	\$0.00	\$1,041.25
64327	Marin, William & Janelle	\$1,065.75	\$0.00	\$1,065.75
64328	Shadow Oaks	\$7,264.25	\$0.00	\$7,264.25
64326	L003358033- Brown, William Samuel (L003358033)	\$61.25	\$22.00	\$83.25
<i>Total</i>		\$15,202.25	\$642.50	\$15,844.75

**Gilligan, Anderson & Phelan, 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 # 64328****DATE 12/31/2021****MATTER**

Shadow Oaks

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/01/2021	SMS: Continue drafting Motion to Dismiss; Discussion with Attorney Gwendolyn Williams re meeting with Buller and facts for Motion; Research on use of public records in Motion to Dismiss; Review documents received from Officer Buller and others at City to use in Motion; Draft facts section of Motion	2.20	539.00
12/01/2021	GPW: Office conference with Attorney Sydney Simmons re question on background and evidence for Motion to Dismiss	0.10	24.50
12/02/2021	SMS: Draft Request for Judicial Notice of Public Records	0.40	98.00
12/02/2021	SMS: Continue drafting Motion to Dismiss; Begin edits of the same	2.30	563.50
12/03/2021	SMS: Continue drafting Motion to Dismiss and Request for Judicial Notice; Search public records to use exhibits for Motion; Edit Motion; Send to Attorney Patrick Gilligan for review	3.80	931.00
12/06/2021	PGG: Review draft Motion to Dismiss; Office conference with Attorney Sydney Simmons about same; Telephone conference with Attorney Green about Motion to Dismiss per federal court consultation requirement; Update case diary	1	245.00
12/06/2021	SMS: Office conference with Attorney Patrick Gilligan about Motion to Dismiss; Telephone conference with Attorney Green about Motion to Dismiss per federal court consultation requirement; Emails with Attorney Patrick Gilligan re case file	0.60	147.00
12/08/2021	SMS: Review emails from Attorney Patrick Gilligan re Amended Complaint; Review Amended Complaint	0.40	98.00
12/09/2021	SMS: Research corporate history of Shadow Oaks and Pioneer Mobile Home Park; Review emails from Paralegal Shannon Crandall re same; Discussions with Attorney Patrick Gilligan and Attorney Gwendolyn Williams re case strategy; Begin drafting Answer to Amended Complaint; Research on administrative remedies; Follow up discussions with Attorney Patrick Gilligan and Attorney Gwendolyn Williams; Telephone conference with Ken Clements re strategy	3.20	784.00

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DATE	DESCRIPTION	HOURS	AMOUNT
12/09/2021	PGG: Office conferences with Attorney Sydney Simmons and Attorney Gwendolyn P. Williams about second amended complaint and possible Motion to Dismiss vs. Answer	0.65	159.25
12/09/2021	GPW: Office conferences with Attorney Patrick Gilligan and Attorney Sydney Simmons re strategy moving forward; Office conference with Attorney Sydney Simmons re issue of exhausting administrative remedies; Office conference with Attorney Patrick Gilligan and Attorney Sydney Simmons re same and re affirmative defenses; Telephone conference with Attorney Sydney Simmons and Ken Clements re strategy; Read email from Ken Clements to Attorney Patrick Gilligan	1.20	294.00
12/10/2021	PGG: Read and respond to email from Ken Clements about strategy of answering complaint vs. Motion to Dismiss; Instructions to Paralegal and Attorney Sydney Simmons; Office conference with Attorney Sydney Simmons about investigation into Pioneer Mobile Home Part; Update Casemap; Read email from Jeffery Ball about code cases in various Mobile Home Parks; Office conference with Attorney Sydney Simmons and Paralegal about site inspection; Review Google maps to locate parks	0.90	220.50
12/10/2021	SMS: Discussions with Attorney Patrick Gilligan and Paralegal Shannon Crandall re Answer draft; Telephone conference with Jimmy Pogue and Jeffrey Ball at Code re questions for Answer draft; Emails with Jeffrey Ball re follow up; Emails with Attorney Patrick Gilligan re status of file; Finish review of case file received from Code to prepare Answer; Draft Answer and Affirmative Defenses; Send to Attorney Patrick Gilligan for initial review; Update case diary	2.50	612.50
12/12/2021	PGG: Update Casemap for witness Jeffrey Ball; Draft email to Attorney Sydney Simmons and Attorney Gwendolyn P. Williams about same; Instructions to Paralegal and Attorney Sydney Simmons about getting additional information on other mobile home parks and code enforcement action; Review and revise answer and Affirmative Defenses	1	245.00
12/13/2021	SMS: Review email correspondence from Attorney Patrick Gilligan and Paralegal Shannon Crandall re Answer to Amended Complaint; Review Attorney Patrick Gilligan edits to Answer and discussion with Attorney Patrick Gilligan re same; Finalize Answer and send to Paralegal Shannon Crandall for filing; Email Jeffrey Ball re initiation of spreadsheet for mobile home parks from City; Update Casemap with status of case and re emails	0.60	147.00
12/14/2021	PGG: Update case diary for answer; Instructions to Paralegal about discovery; Office conference with Attorney Sydney Simmons about same; Office conference with Attorney Sydney Simmons about initial discovery	0.40	98.00
12/14/2021	SMS: Discussions with Paralegal Shannon Crandall and Attorney Gwendolyn Williams re initial disclosures and deadline; Research on deadline for initial disclosures; Email to Paralegal Shannon Crandall re instructions to draft initial disclosures; Discussion with Attorney Patrick Gilligan re initial discovery; Begin drafting initial discovery requests; Send to Attorney Patrick Gilligan for review; Pull local rules for deadlines required in case; Email instructions to Paralegal Shannon Crandall re calendaring	2.10	514.50
12/14/2021	PGG: Review Initial Case Order; Instructions to Paralegal and Attorney Sydney Simmons about calendaring all due dates; Proof and revise initial discovery to Plaintiff	0.70	171.50

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DATE	DESCRIPTION	HOURS	AMOUNT
12/16/2021	PGG: Review Reply to Affirmative Defenses; Instructions to Paralegal	0.10	24.50
12/20/2021	PGG: Update case diary for receipt of initial discovery; Instructions to Paralegal about setting Depositions; Proof Certificate of Interested Persons; Office conference with Attorney Sydney Simmons about Case Management Order Report; Instructions to Paralegal; Office conference with Attorney Sydney Simmons and Paralegal about timing of filing Case Management Order Report	0.60	147.00
12/20/2021	SMS: Prepare Certificate of Interested Persons per Case Order; Email to Paralegal Shannon Crandall to finalize and edit the same; Review other deadlines and Middle District rules for case management; Email instructions to Paralegal Shannon Crandall re scheduling case management conference with opposing counsel; Follow up discussions with Paralegal Shannon Crandall and Attorney Patrick Gilligan re same	1	245.00
12/21/2021	PGG: Update case diary	0.10	24.50
12/21/2021	PGG: Calendar second Proposal for Settlement to Plaintiff	0.10	24.50
12/21/2021	SMS: Discussion with Attorney Patrick Gilligan re Notice of Taking Corporate Deposition of Shadow Oaks; Review email from Paralegal Shannon Crandall re same; Review federal rules for requirements for Notice; Begin drafting Notice of Taking Corporate Deposition	0.50	122.50
12/22/2021	SMS: Finish drafting Notice of Taking Corporate Deposition; Send to Attorney Patrick Gilligan for review; Update case diary	0.60	147.00
12/26/2021	PGG: Review and revise 30(b)(6) Deposition notice; Instructions to Paralegal	0.15	36.75
12/27/2021	SMS: Review Attorney Patrick Gilligan's email re Notice of Corporate Deposition	0.10	24.50
12/27/2021	PGG: Review Chubb request for budget and initial report; Office conference with Attorney Sydney Simmons about same	0.30	73.50
12/27/2021	PGG: Instructions to Paralegal about getting alternative dates for corporate deposition of Plaintiff	0.10	24.50
12/27/2021	PGG: Review and revise Case Management Order Report; Instructions to Paralegal	0.35	85.75
12/27/2021	SMS: Discussion with Attorney Patrick Gilligan re report to Chubb on case strategy; Complete draft of Initial Report; Send to Attorney Patrick Gilligan for review	1.10	269.50
12/30/2021	SMS: Begin converting Motion to Dismiss to Motion for Summary Judgment	0.50	122.50
			Subtotal: 7,264.25

Hours Summary:

- SMS- PGG (SMS): 21.90h @\$245.00 = \$5,365.50  
- Patrick Gilligan (PGG): 6.45h @\$245.00 = \$1,580.25  
- GPW- PGG (GPW): 1.30h @\$245.00 = \$318.50

BALANCE DUE

**\$7,264.25**

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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 #** 64327**DATE** 12/31/2021**MATTER**

Marin, William &amp; Janelle

**CLAIM #**

L001547753

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/02/2021	PGG: Review Pretrial and Trial Order; Calendar due dates; Instructions to Paralegal	0.35	85.75
12/08/2021	PGG: Prepare for and attend deposition of Plaintiffs; Instructions to Paralegal about Subpoenaing Dr. Fakhoury records	3.50	857.50
12/10/2021	PGG: Draft email to Paralegal about records Subpoena to Fakhoury Chiropractic	0.10	24.50
12/12/2021	PGG: Proof Notice of Production from Non-Party to Dr. Fakhoury; Instructions to Paralegal; Update case diary for service of Subpoenas	0.20	49.00
12/21/2021	PGG: Review and execute records Subpoenas; Calendar for receipt of records	0.20	49.00

Subtotal: 1,065.75

## Retainer information:

+ Previous account balance: \$0.00  
+ New charges: \$1,065.75  
- Previous retainer balance: \$400.00  
- Payment made from retainer: \$400.00  
= New account balance: \$665.75  
= New retainer balance: \$0.00

**BALANCE DUE****\$1,065.75**

## Hours Summary:

- Patrick Gilligan (PGG): 4.35h @\$245.00 = \$1,065.75

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**INVOICE #** 64326**DATE** 12/31/2021**MATTER**

Brown, William Samuel (L0033...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/07/2021	PGG: Read email from Carolyn Goodwine about subrogation acceptance from Progressive; update Casemap	0.15	36.75
12/29/2021	GPW: Office conference with City Paralegal Shannon Crandall re status of discovery requests and casemapping same	0.10	24.50
			Subtotal: 61.25
	===== Expenses		
12/06/2021	ChartSwap: Medical Records		22.00
			Subtotal: 22.00

## Hours Summary:

- Patrick Gilligan (PGG): 0.15h @\$245.00 = \$36.75  
- GPW- PGG (GPW): 0.10h @\$245.00 = \$24.50

**BALANCE DUE****\$83.25**

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**INVOICE #** 64325**DATE** 12/31/2021**MATTER**

Hernandez, Pedro

**CLAIM #**

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/09/2021	PGG: Office conference with Attorney Gwendolyn P. Williams about upcoming Depositions	0.35	85.75
12/09/2021	GPW: Office conference with Attorney Patrick Gilligan re preparation for pre-deposition meetings and depositions of City employees; Office conference with City Paralegal Shannon Crandall re sending pre-deposition letter to deponents	0.35	85.75
12/13/2021	GPW: Prepare for and attend pre-deposition meetings with William Rodriguez-Cayro, Jeff Kerley, and Andrew Curbelo; Office conference with Paralegal Kristin Peterson re printing pre-deposition letter	0.50	122.50
12/14/2021	GPW: Prepare for and attend depositions of Bill Rodriguez-Cayro, Jeff Kerley and Andrew Curbelo; Office conference with Attorney Patrick Gilligan re same	2.60	637.00
12/14/2021	PGG: Office conference with Attorney Gwendolyn P. Williams about Depositions of city employees	0.25	61.25
12/21/2021	PGG: Read and respond to email from Carolyn Goodwine about review of Plaintiff's Deposition and child's medicals; Instructions to Paralegal	0.20	49.00

Subtotal: 1,041.25

## Hours Summary:

- GPW- PGG (GPW): 3.45h @\$245.00 = \$845.25  
- Patrick Gilligan (PGG): 0.80h @\$245.00 = \$196.00

**BALANCE DUE****\$1,041.25**

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**INVOICE # 64324****DATE 12/31/2021****MATTER**

Goff, James

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/06/2021	PGG: Instructions to Paralegal about preparing litigation budget	0.10	24.50
12/07/2021	PGG: Prepare litigation budget and email to Carolyn Goodwine	0.50	122.50
12/12/2021	PGG: Review medical records from Classic Home Health; Instructions to Paralegal about Casemap	0.35	85.75
12/29/2021	GPW: Office conference with City Paralegal Shannon Crandall re status of discovery requests	0.10	24.50

Subtotal: 257.25

## Hours Summary:

- Patrick Gilligan (PGG): 0.95h @\$245.00 = \$232.75  
- GPW- PGG (GPW): 0.10h @\$245.00 = \$24.50

**BALANCE DUE****\$257.25**

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**INVOICE #** 64323**DATE** 12/31/2021**MATTER**

Forsyth-JJ

**CLAIM #**

L001430074

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/03/2021	PGG: Office conference with Attorney Ed McClellan and Attorney Chris Anderson to prepare for 57.105 fee hearing	1	245.00
12/03/2021	CAA: Office conference with Attorney Pat Gilligan and Fee Expert Ed McClellan about background of case	1.70	416.50
12/06/2021	PGG: Instructions to Paralegal about preparation of hearing notebook for 57.105 hearing	0.10	24.50
12/06/2021	CAA: Telephone call with Fee Expert Ed McClellan about print out of materials; Print same	0.20	49.00
12/09/2021	PGG: Review notice of hearing filed by attorney Mari; Instructions to Paralegal	0.10	24.50
12/09/2021	PGG: Telephone conference with Attorney McClellan and Office conference with Attorney Chris Anderson about attorney fee hearing	0.35	85.75
12/13/2021	CAA: Office conference with Attorney Patrick Gilligan and Fee Expert Ed McClellan about expert testimony	1.70	416.50
12/13/2021	PGG: Office conference with Attorney Chris Anderson and Attorney McClellan to prepare for fee hearing	1.50	367.50
12/14/2021	CAA: Review records about calculation of attorneys' fees; Office conference with Attorney Patrick Gilligan about same	0.60	147.00
12/14/2021	CAA: Research potential requirement to disclose records; Review motion for continuance	0.30	73.50
12/14/2021	PGG: Office conference with Paralegal about documents needed for fee hearing; Review Motion to Continue hearing filed by Attorney King	0.35	85.75
12/15/2021	PGG: Instructions to Paralegal about documents needed for hearing file	0.10	24.50
12/15/2021	PGG: Draft email to Attorney McClellan about Motion to Continue filed by Plaintiff	0.10	24.50
12/15/2021	PGG: Prepare and attend fee hearing	3.50	857.50
12/15/2021	CAA: Telephone call with Attorney Patrick Gilligan about result of	0.10	24.50

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DATE	DESCRIPTION	HOURS	AMOUNT
	hearing on attorneys' fees		
12/23/2021	PGG: Read and respond to email from Ken Clements about appeal process as to judgment against Plaintiff	0.10	24.50
			Subtotal: 2,891.00
Hours Summary:			
- Patrick Gilligan (PGG): 7.20h @\$245.00 = \$1,764.00			
- Christopher Anderson (CAA): 4.60h @\$245.00 = \$1,127.00			
BALANCE DUE			<b>\$2,891.00</b>

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**INVOICE #** 64322**DATE** 12/31/2021**MATTER**

Clifton, Talia

**CLAIM #**

L002678511

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/06/2021	PGG: Review and confirm all pre-trial dates; Instructions to Paralegal	0.20	49.00
12/07/2021	SMS: Email to Paralegal Shannon Crandall re response deadline for last sent interrogatories	0.10	24.50
12/09/2021	GPW: Office conference with Attorney Patrick Gilligan re attending mediation; Telephone conference with Attorney Patrick Gilligan, City Paralegal Shannon Crandall and Carolyn Goodwine re Plaintiff's updated medicals	0.35	85.75
12/09/2021	PGG: Telephone conference with Carolyn Goodwine and Office conference with Attorney Gwendolyn P. Williams and Paralegal about mediation and updated medicals; Read and respond to email from Carolyn Goodwine about deposition and response to Proposal for Settlement	0.50	122.50
12/10/2021	PGG: Instructions to Paralegal about upcoming mediation and preparation of mediation statement	0.10	24.50
12/12/2021	PGG: Draft mediation summary	0.50	122.50
12/13/2021	SMS: Discussion with Paralegal Shannon Crandall re tasks necessary for mediation this week	0.10	24.50
12/14/2021	PGG: Review updated medical records from Plaintiff's Attorney; Forward same to Risk/PMA; Instructions to Paralegal about review an summary	0.25	61.25
12/15/2021	PGG: Read email from Carolyn Goodwine about analysis of updated medicals for mediation; Instructions to Paralegal	0.10	24.50
12/16/2021	PGG: Prepare and attend mediation; Instructions to Paralegal about additional discovery and scheduling Deposition of Plaintiff	3.25	796.25
12/16/2021	SMS: Discussion with Attorney Patrick Gilligan following mediation re researching presumptions of negligence in rear end auto cases; Begin research on same	0.90	220.50
12/17/2021	PGG: Review mediator's bill; Instructions to Paralegal about payment	0.10	24.50

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DATE	DESCRIPTION	HOURS	AMOUNT
12/17/2021	PGG: Review Research on presumption of negligence in rear-end collision; Draft email to Carolyn Goodwine, Ken Clements and Richard Dennis about possibility of hiring accident reconstructionist and filing second Proposal for Settlement; Read and respond to emails from Carolyn Goodwine and to Richard Dennis about CME and scheduling Deposition of Plaintiff	1.10	269.50
12/17/2021	SMS: Finish case law analysis for rear end collision presumption of negligence; Draft summary of research; Send to Attorney Patrick Gilligan for review	0.80	196.00
12/20/2021	PGG: Read and respond to email from Carolyn Goodwine about settlement; Office conference with her about Proposal for Settlement; Instructions to Paralegal about preparing Proposal for Settlement for \$20,000	0.35	85.75
12/21/2021	PGG: Instructions to Paralegal about issuing records Subpoenas	0.10	24.50
12/21/2021	PGG: Draft good faith discovery letter to Plaintiff's counsel	0.10	24.50
12/21/2021	PGG: Draft email to Attorney Cruz about deposition of Plaintiff; Instructions to Paralegal about scheduling for our office	0.25	61.25
12/22/2021	PGG: Review and revise Deposition notice of Plaintiff	0.10	24.50
12/23/2021	PGG: Update case diary for response to Proposal for Settlement and Deposition date of Plaintiff; Instructions to Paralegal about follow up on records Subpoenas	0.20	49.00
12/27/2021	PGG: Instructions to Paralegal about preparing Motion to Compel	0.10	24.50
12/29/2021	SMS: Review case diary; Email correspondence with Attorney Patrick Gilligan and Paralegal Shannon Crandall re potential Motion to Compel; Instructions to Paralegal Shannon Crandall re editing Motion to Compel; Review and edit Motion to Compel; Send to Paralegal Shannon Crandall with instructions for editing and finalizing and to Attorney Patrick Gilligan for approval	0.60	147.00
12/30/2021	PGG: Proof and revise Motion to Compel	0.20	49.00
			Subtotal: 2,535.75
	===== Expenses		
12/17/2021	Mediate First: Mediation fee; Invoice #32972-2		620.50
			Subtotal: 620.50
	===== Services (Not Billed)		
12/16/2021	SMS: Attend mediation with Attorney Patrick Gilligan and City representatives	1.60	0.00
			Subtotal: 0.00
Hours Summary:		BALANCE DUE	<b>\$3,156.25</b>
- Patrick Gilligan (PGG): 7.50h @\$245.00 = \$1,837.50			
- SMS- PGG (SMS): 2.50h @\$245.00 = \$612.50			
- GPW- PGG (GPW): 0.35h @\$245.00 = \$85.75			

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Tampa, FL 33607

**INVOICE #** 64321

**DATE** 12/31/2021

**MATTER**

American Humanist Assn

**CLAIM #**

L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/06/2021	PGG: Review Joint Notice Regarding Suggestion of Death and Impact on Appeal	0.20	49.00

Subtotal: 49.00

Hours Summary:

- Patrick Gilligan (PGG): 0.20h @\$245.00 = \$49.00

**BALANCE DUE**

**\$49.00**

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**INVOICE #** 61668

**DATE** 12/31/2020

**MATTER**

Garcia de Sanchez, Jourdan

**CLAIM #**

L001734621

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/15/2020	PGG: Update case diary	0.15	36.75
			Subtotal: 36.75

Hours Summary:

- Patrick Gilligan (PGG): 0.15h @\$245.00 = \$36.75

**BALANCE DUE**

**\$36.75**

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