

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: 5/4/2023

Invoice	Matter	Fees	Expenses	Amount
65876	American Humanist Assn	\$10.00	\$0.00	\$10.00
65877	Brown, William Samuel (L003358033)	\$5,771.25	\$658.50	\$6,429.75
65878	Day, James and Joann	\$1,056.25	\$0.00	\$1,056.25
65879	Goff, James	\$440.00	\$521.25	\$961.25
65880	Harris, Emily and Aron (L003591568)	\$6,316.25	\$0.00	\$6,316.25
65881	Secki	\$210.00	\$0.00	\$210.00
65882	Shadow Oaks	\$100.00	\$0.00	\$100.00
65883	Williams and Greene (L003434864)	\$2,947.50	\$10.00	\$2,957.50
<i>Total</i>		\$16,851.25	\$1,189.75	\$18,041.00

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 # 65876

DATE 04/30/2023

MATTER

American Humanist Assn

CLAIM #

L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/03/2023	SC: Review order granting extension of time; Update case diary	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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Tampa, FL 33607

INVOICE # 65877

DATE 04/30/2023

MATTER

Brown, William Samuel (L0033...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/03/2023	SMS: Continue edits to deposition outline for Dr. Schweizer; Continue reviewing documents for use in deposition; Email to Paralegal instructing preparation of more documents for deposition	0.55	178.75
04/03/2023	SMS: Review email confirming Dr. Schweizer deposition; Begin reviewing documents in preparation for same; Begin drafting deposition outline for same; Office conference with Paralegal Shannon Crandall to review documents to use as exhibits for deposition	1.60	520.00
04/04/2023	PGG: Office conference with Attorney Sydney Simmons about supplementing Motion for Summary Judgment after neurologist deposition	0.10	32.50
04/04/2023	SMS: Finish preparing Deposition Outline; Discussion with and emails to Paralegal for order of exhibits	1.65	536.25
04/04/2023	SMS: Attend and take deposition of Dr. Schweizer; Follow up with Attorney Patrick Gilligan and Paralegal Shannon Crandall	2	650.00
04/04/2023	SMS: Follow up instructions to Paralegal to draft letter to Dr. Schweizer requesting CD of MRI images from Decedent	0.10	32.50
04/04/2023	SC: Prepare depo exhibits; Attend deposition of Dr. Schweizer	2	200.00
04/12/2023	SMS: Review emails with transcript of Schweizer deposition and instructions to Paralegal to draft Notice of Filing same	0.15	48.75
04/12/2023	SC: Review email instruction from Attorney Patrick Gilligan; Review notice of appearance of co-counsel; Update certificate of service; Prepare notice of filing depo transcript of Dr. Schweizer; Prepare and send email to Attorney Patrick Gilligan submitting same for review and approval	0.50	50.00
04/13/2023	SMS: Review and approve Paralegal draft of Notice of Filing Schweizer deposition	0.10	32.50
04/13/2023	SC: Review email approval from Attorney Patrick Gilligan; Revise notice of filing depo transcript and prepare for filing; File and serve same; Prepare and send email to Risk attaching same; Update case	0.50	50.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	diary		
04/14/2023	SMS: Review and respond to email from Attorney Bloom re extension for deadline for Boucher interrogatory responses	0.10	32.50
04/14/2023	SC: Email exchange with opposing counsel regarding extension for discovery responses	0.10	10.00
04/14/2023	SC: Prepare answers to Boecher interrogatories for Dr. Baxter, Dr. Bhosali, Dr. Elbadri, Dr. Rockower, Dr. Schweizer, Dr. Titelbaum and Dr. Velez; Prepare response to Boecher request to produce	2.50	250.00
04/17/2023	SMS: Review and edit Notice of Compliance for Plaintiff's request for copies and instruct Paralegal to file same	0.10	32.50
04/17/2023	SC: Email exchange with Attorney Sydney Simmons regarding discovery responses; Review deposition transcript of Dr. Schweizer and depo notes from depo of Dr. Velez; Prepare answers to expert interrogatories and expert request to produce; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval	2	200.00
04/17/2023	SC: Review file; Prepare updated compliance with request for copies; File same; Update records in Dropbox; Prepare and send service email to opposing counsel with Dropbox link; Update case diary	0.60	60.00
04/17/2023	SMS: Discussion with Paralegal Shannon Crandall re finalizing Boucher discovery responses; Review and edit Paralegal Shannon Crandall's drafted Responses and instruct Paralegal Shannon Crandall to finalize	0.70	227.50
04/17/2023	SC: Review email from Attorney Sydney Simmons; Revise response to expert interrogatories and expert request to produce; File same and serve on opposing counsel; Revise answers to all Boescher interogs and expert interogs; Prepare and send email to Richard Dennis attaching same for execution and return; Update case diary	0.60	60.00
04/18/2023	SMS: Begin drafting Pretrial Conference Statement	0.45	146.25
04/18/2023	SMS: Review email from opposing counsel's office re setting deposition of Christina Perez; Review case deadlines and trial term; Respond to email from opposing counsel's office requesting clarification and requesting telephone conference for case status and trial term	0.25	81.25
04/19/2023	SC: Email exchange with Jessica and Attorney Bloom's office regarding deposition of eye witness; Calendar deposition; Update case diary	0.30	30.00
04/19/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare cross notice of taking deposition of eye witness Christina Perez; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval	0.60	60.00
04/19/2023	SC: Review email from Richard Dennis and attached, executed answers to interrogatories; Prepare notice of filing; Prepare and send email to Attorney Sydney Simmons to review and approve same	0.60	60.00
04/19/2023	SC: Office conference with Attorney Sydney Simmons regarding case status;	0.10	10.00
04/19/2023	SC: Review email from Attorney Sydney Simmons with instruction; Review and revise pretrial statement; Office conference with Attorney Sydney Simmons regarding same; File and serve same; Prepare and send email to Risk attaching same; Update case diary	0.60	60.00
04/19/2023	SC: Prepare and send email to Richard Dennis regarding additional	0.50	50.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	answers; Review and respond to email from Attorney Sydney Simmons regarding notice of serving answers; File and serve same; Prepare and send opposing counsel all answers to interrogatories; Update case diary		
04/19/2023	SMS: Finish drafting Pretrial Conference Statement; Instruct Paralegal to finalize same and file	1.30	422.50
04/19/2023	SMS: Begin reviewing documents for trial and pretrial conference; Review videos of accident scene and begin casemapping details of same	0.50	162.50
04/19/2023	SMS: Instruct Paralegal Shannon Crandall to draft Cross Notice of deposition for witness Christina Perez; Edit same and instruct Paralegal to file	0.20	65.00
04/20/2023	SMS: Instruct Paralegal to file Amended Pretrial Conference Statement to include attachments	0.10	32.50
04/20/2023	SMS: Review email correspondence from Paralegal re subpoena for witness deposition and filing Notice of Deposition for same	0.10	32.50
04/20/2023	SC: Prepare amended pretrial statement and file same	0.20	20.00
04/20/2023	SC: Revise cross-notice of taking deposition and notice of serving answers to interrogatories; File and serve same	0.30	30.00
04/22/2023	SC: Review file and outstanding discovery responses to plaintiff; Prepare good faith letter; Prepare and send email to Attorney Patrick Gilligan to review and approve same; Update case diary	0.50	50.00
04/24/2023	SC: Review email from Attorney Sydney Simmons; Prepare final form of good faith letter; Serve same on opposing counsel; Update case diary and calendar deadline five day response	0.30	30.00
04/24/2023	SC: Review and respond to email from Jackie at PMA regarding trial term	0.10	10.00
04/24/2023	SC: Review pretrial statement from plaintiff; Update case diary	0.20	20.00
04/25/2023	SC: Review answers to expert interrogatories, response to expert request to produce and responsive documents; Prepare and send email to Risk attaching same for review; Update case diary	0.50	50.00
04/25/2023	PGG: Review responses to expert discovery; Instructions to Paralegal	0.40	130.00
04/25/2023	PGG: Review affidavit of Plaintiff's retained expert; Review response to Motion for Summary Judgment; Office conference with Attorney Sydney Simmons about Reply and supplementing record	0.35	113.75
04/25/2023	PGG: Review Pretrial Conference Statement from Plaintiff; Instructions to Paralegal about getting witness and exhibit list	0.15	48.75
04/25/2023	SC: Review email instruction from Attorney Patrick Gilligan; Prepare and send email to opposing counsel regarding failure to attach witness and exhibit list to pretrial statement; Update case diary for receipt of attachments	0.20	20.00
04/25/2023	SC: Review email instruction from Attorney Patrick Gilligan; Several calls with Sarasota Memorial regarding medical records response; Office conference with Attorney Sydney Simmons regarding same	0.50	50.00
04/25/2023	SMS: Review and analyze Plaintiff's Response to Motion for Summary Judgment; Follow up discussion with Attorney Patrick Gilligan re strategy for replying to same; Begin researching standard for summary judgment evidence; Attempt call to Doctor Schweizer's office to receive discs for MRI and other scans of Decedent; Begin drafting Reply to Response to Motion for Summary Judgment	0.90	292.50
04/25/2023	SC: Review Notice of Conflict rec'd from opposing co-counsel	0.10	10.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	Dellinger; Update case diary		
04/26/2023	PGG: Instructions to Paralegal about Plaintiff's Notice of Trial Conflict; Read email from Judicial Assistant about Zoom Pretrial Conference hearing time; Instructions to Paralegal about same; Review Plaintiff's Pretrial Conference Statement and Witness and Exhibit list; Instructions to Paralegal and Attorney Sydney Simmons about requesting copies of Plaintiff's listed Exhibits	0.40	130.00
04/26/2023	SC: Review email from JA with updated instructions for pretrial conference; Update calendar	0.10	10.00
04/26/2023	SC: Review and respond to email from Attorney Bloom's office regarding amended pretrial statement; Review filed, amended pretrial statement; Update case diary	0.20	20.00
04/27/2023	PGG: Prepare and attend Case Management Conference	0.40	130.00
04/27/2023	SC: Prepare verdict form, jury instructions and notice of filing; Update case diary; Prepare and send email to Attorney Patrick Gilligan regarding same	0.60	60.00
04/30/2023	SMS: Continue drafting Reply to Response to Motion for Summary Judgment	0.40	130.00
			Subtotal: 5,771.25
	===== Expenses		
04/12/2023	Owen & Associates: Depo transcript of Dr. Schweizer deposition		658.50
			Subtotal: 658.50
	===== Services (Not Billed)		
04/27/2023	SMS: Attend pretrial conference with Attorney Patrick Gilligan	0.20	0.00
			Subtotal: 0.00

Hours Summary:

- SMS- PGG (SMS): 11.25h @\$325.00 = \$3,656.25
- SC- PGG (SC): 15.30h @\$100.00 = \$1,530.00
- Patrick Gilligan (PGG): 1.80h @\$325.00 = \$585.00

BALANCE DUE

\$6,429.75

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INVOICE # 65878

DATE 04/30/2023

MATTER

Day, James and Joann

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/27/2023	PGG: Read and respond to email from City Attorney Will Sexton about filing of complaint and service; Office conference with Paralegal and Attorney Sydney Simmons about service issue and default; Read email from City Attorney Will Sexton about filing answer	0.50	162.50
04/27/2023	SC: Review email from City Attorney Sexton; Review clerk docket to confirm suit filed; Obtain and review complaint and return of service reflecting service date of March 28; Office conference with Attorney Pat Gilligan and Attorney Sydney Simmons regarding same	0.50	50.00
04/28/2023	PGG: Instructions to Paralegal about drafting Answer and Affirmative Defenses; Review and revise Answer and Affirmative Defenses; Office conference with Attorney Sydney Simmons about possible statutory defenses	1.20	390.00
04/28/2023	SC: Review email from City Attorney Sexton; Review email instruction from Attorney Patrick Gilligan; Begin draft of answer and affirmative defenses; Prepare and send email to Attorney Patrick Gilligan attaching same; Prepare and send email to Attorney Patrick Gilligan and Attorney Sydney Simmons regarding need for claims analysis and litigation budget; Update case diary	1	100.00
04/28/2023	SMS: Review Attorney Patrick Gilligan's draft Answer and Affirmative Defenses; Review research related to damages pursuant to cemetery regulation statutes; Draft Affirmative Defense related to actual damages; Send to Attorney Patrick Gilligan for finalization	0.75	243.75
04/28/2023	SC: Review email instruction from Attorney Patrick Gilligan; Prepare draft interrogatories to James Day, notice of serving and request to produce to James Day; Prepare and send email to Attorney Patrick Gilligan attaching same for revision and completion	0.60	60.00
04/28/2023	SC: Review email instruction from Attorney Patrick Gilligan; Revise answers; File and serve same; Update case diary; Prepare and send email to client attaching same	0.50	50.00

Subtotal: 1,056.25

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Hours Summary:

- Patrick Gilligan (PGG): 1.70h @\$325.00 = \$552.50
- SC- PGG (SC): 2.60h @\$100.00 = \$260.00
- SMS- PGG (SMS): 0.75h @\$325.00 = \$243.75

BALANCE DUE

\$1,056.25

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INVOICE # 65879

DATE 04/30/2023

MATTER

Goff, James

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/03/2023	SMS: Email correspondence instructing Paralegal to order depositions of Ron Lirot and Tom Casey	0.10	32.50
04/03/2023	SC: Email exchange with Attorney Sydney Simmons and court reporter regarding ordering depo transcripts of City employees	0.10	10.00
04/03/2023	PGG: Instructions to Paralegal about handling of deposition transcripts received	0.10	32.50
04/05/2023	PGG: Draft email to Attorney Sydney Simmons about possible County work on sidewalk	0.10	32.50
04/10/2023	PGG: Office conference with Attorney Sydney Simmons about talking to Precision employee who remembers sidewalk work	0.10	32.50
04/10/2023	SMS: Office conference with Attorney Patrick Gilligan about talking to Precision employee who remembers sidewalk work	0.10	32.50
04/14/2023	SMS: Email correspondence with Alan MacMurray from Precision re setting deposition of employee	0.30	97.50
04/14/2023	SMS: Email to Alan MacMurray re requesting call with employee related to information on fixing "county office driveway"	0.20	65.00
04/17/2023	SMS: Instruct Paralegal to draft subpoena for deposition of Precision employee	0.10	32.50
04/19/2023	SC: Office conference with Attorney Sydney Simmons regarding case status;	0.10	10.00
04/20/2023	SMS: Email instructions to Paralegal re length of time for deposition of Precision Sidewalk employee; Review emails from Paralegal to opposing counsel re dates for deposition	0.10	32.50
04/20/2023	SC: Email exchange with Attorney Sydney Simmons regarding depo of Precision employee; Email exchange with Jennifer at Babiarz office regarding same	0.20	20.00
04/28/2023	SC: Prepare and send follow up email to Jennifer at Babiarz office regarding deposition dates	0.10	10.00

Subtotal: 440.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	===== Expenses		
04/03/2023	Owen & Associates: Depo transcripts of T. Casey and R. Lirot		521.25
			Subtotal: 521.25

Hours Summary:

- SMS- PGG (SMS): 0.90h @\$325.00 = \$292.50
- Patrick Gilligan (PGG): 0.30h @\$325.00 = \$97.50
- SC- PGG (SC): 0.50h @\$100.00 = \$50.00

BALANCE DUE

\$961.25

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INVOICE # 65880

DATE 04/30/2023

MATTER

Harris, Emily and Aron (L003...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/02/2023	PGG: Review form consortium interrogatories; Draft email to Attorney Victoria Cortez for use in upcoming Plaintiff's deposition	0.20	65.00
04/03/2023	VC: Reviewed, extracted, and CaseMapped medical records received from Advanced Imaging for Plaintiff E. Harris	0.50	162.50
04/03/2023	VC: Reviewed, extracted, notated, and casemapped medical records received from Orthopaedic Institute, Ocala Family Care Specialists, and Gastroenterology/ Ocala Endoscopy Records for Plaintiff E. Harris	3.90	1,267.50
04/04/2023	PGG: Office conference with Attorney Victoria Cortez about upcoming Deposition of Plaintiffs	0.10	32.50
04/04/2023	VC: Office conference with Attorney Patrick Gilligan regarding potential attorney client privilege objections to proposed deposition questions	0.20	65.00
04/04/2023	VC: Office conference with Attorney Patrick Gilligan regarding use of maps as deposition exhibits, and proposed questions regarding consortium claim by Plaintiff A. Harris	0.20	65.00
04/04/2023	VC: Drafted deposition outline for Plaintiff E. Harris and reviewed medical records, interrogatories, and the Complaint relevant to same; Determined exhibits to be used during deposition of Plaintiff E. Harris; Drafted deposition outline for Plaintiff A Harris and reviewed interrogatories relevant to same; Determined exhibits to be used during deposition of Plaintiff A. Harris	4.50	1,462.50
04/05/2023	PGG: Office conference with Attorney Victoria Cortez about Plaintiff not being able to remember date of accident; Office conference with Attorney Victoria Cortez about post-deposition issues and filing a Proposal for Settlement	0.60	195.00
04/05/2023	VC: Prepared for depositions of Plaintiffs; Finalized edits to outline, completed review of medical records, and completed selection of exhibits to be used during depositions	0.80	260.00
04/05/2023	VC: Attended/conducted deposition of Plaintiff Emily Harris	3.50	1,137.50

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DATE	DESCRIPTION	HOURS	AMOUNT
04/05/2023	VC: Attended/conducted deposition of Plaintiff Aron Harris	0.70	227.50
04/05/2023	VC: Office conference with Attorney Patrick Gilligan and Paralegal Shannon Crandall regarding depositions of Plaintiffs and next steps; Office conference with Attorney Patrick Gilligan and Paralegal Shannon Crandall regarding submitting Proposal for Settlement based on depositions	0.40	130.00
04/05/2023	VC: Drafted email to City Risk Manager, Richard Dennis, regarding case update, depositions, and Proposal for Settlement	0.10	32.50
04/05/2023	VC: Telephone conference with City Risk Manager, Richard Dennis, regarding case update and Proposal for Settlement; Drafted follow up email to Richard Dennis regarding settlement amounts and reasoning	0.20	65.00
04/05/2023	SC: Review exhibits and prepare for deposition of Emily and Aron Harris	0.50	50.00
04/05/2023	SC: Attend and assist with deposition of Emily Harris	3.50	350.00
04/05/2023	SC: Attend and assist with deposition of Aron Harris	0.70	70.00
04/05/2023	SC: Office conference with Attorney Patrick Gilligan and Attorney Victoria Cortez regarding depositions and next steps	0.40	40.00
04/05/2023	SC: Review work order summary regarding repairs to sidewalk; Office conference with Attorney Patrick Gilligan and Attorney Victoria Cortez regarding same and proposal for settlement	0.30	30.00
04/06/2023	PGG: Read email from Richard Dennis about authorization for Proposals for Settlement to Plaintiffs; Instructions to Paralegal about preparing	0.15	48.75
04/06/2023	SC: Review email instruction from Attorney Patrick Gilligan; Prepare notice serving proposal for settlement, proposal for settlement for Emily Harris, proposal for settlement for Aron Harris, release for Emily Harris and release for Aron Harris; Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.70	70.00
04/06/2023	PGG: Review proposed Proposal for Settlement; Office conference with Paralegal about form changes	0.20	65.00
04/10/2023	PGG: Office conference with Attorney Sydney Simmons about form of Proposal for Settlement; Instructions to Paralegal about filing same in case	0.15	48.75
04/10/2023	SMS: Office conference with Attorney Patrick Gilligan re reviewing Proposals for settlement; Review email from Paralegal Shannon Crandall enclosing drafted Proposals for Settlement and related documents; Edit Proposals to each Plaintiff and General Releases; Send to Attorney Patrick Gilligan for review; Instruct Paralegal to prepare Notice for Serving Proposal	0.75	243.75
04/11/2023	PGG: Instructions to Paralegal about revised Proposal for Settlement	0.10	32.50
04/11/2023	SC: Review email instruction from Attorney Patrick Gilligan; Prepare notice of serving proposal for Aron Harris; Revise notice of serving for Emily Harris; Review email instruction from Attorney Sydney Simmons; File notices of serving proposals for settlement; Prepare and send service email to opposing counsel attaching proposals for settlement; Calculate deadline to accept settlement; Update case diary; Prepare and send email to clients attaching notices and proposals	1	100.00

Subtotal: 6,316.25

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Hours Summary:

- VC- PGG (VC): 15.00h @\$325.00 = \$4,875.00
- SC- PGG (SC): 7.10h @\$100.00 = \$710.00
- Patrick Gilligan (PGG): 1.50h @\$325.00 = \$487.50
- SMS- PGG (SMS): 0.75h @\$325.00 = \$243.75

BALANCE DUE

\$6,316.25

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INVOICE # 65881

DATE 04/30/2023

MATTER

Secki

CLAIM #

L003387896

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/03/2023	SC: Review medical records from Langley Health; Upload same into CaseMap; Prepare and send email to Attorney Victoria Cortez regarding same	0.50	50.00
04/26/2023	SC: Review Secki interrogatory answers; Compare medical providers listed with those already subpoenaed; Prepare non-party production notice and 20 subpoenas with list of requested records, HIPAA notices and records custodian affidavits; Prepare and send email to Attorney Patrick Gilligan to review and approve same	1	100.00
04/27/2023	SC: Review email instruction from Attorney Patrick Gilligan; Revise non-party production notice; Redact social, date of birth and driver's license number from subpoenas and attachment to subpoenas; File and serve same; Update case diary for date to send subpoenas for service if no objection	0.60	60.00

Subtotal: 210.00

Hours Summary:

- SC- PGG (SC): 2.10h @\$100.00 = \$210.00

BALANCE DUE

\$210.00

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INVOICE # 65882

DATE 04/30/2023

MATTER

Shadow Oaks

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/11/2023	SC: Phone call with Circuit Civil Clerk's office and Federal Clerk's Office; Research Federal Rule 64, supplemental rules regarding asset forfeiture and US Marshall's information regarding service; Office conference with Attorney Patrick Gilligan regarding same	1	100.00

Subtotal: 100.00

Retainer information:

+ Previous account balance: \$0.00
+ New charges: \$100.00
- Previous retainer balance: \$0.00
- Payment made from retainer: \$0.00
= New account balance: \$100.00
= New retainer balance: \$0.00

BALANCE DUE

\$100.00

Hours Summary:

- SC- PGG (SC): 1.00h @\$100.00 = \$100.00

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INVOICE # 65883

DATE 04/30/2023

MATTER

Williams and Greene (L003434...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
04/02/2023	SMS: Review Paralegal Shannon Crandall's draft Motion to Compel In-Person Mediation; Revise draft and research rules of civil procedure to include in same; Send to Attorney Patrick Gilligan for redline	0.80	260.00
04/03/2023	PGG: Review and revise Motion to Compel In Person Mediation; Office conference with Attorney Sydney Simmons about changes	0.35	113.75
04/03/2023	SMS: Discussion with Attorney Patrick Gilligan re edits to Motion to Compel In-Person Mediation; Edit same; Send to Paralegal Shannon Crandall to finalize exhibits	0.30	97.50
04/03/2023	SC: Phone call with Allegiant billing experts regarding status	0.10	10.00
04/03/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise motion to compel and prepare exhibits for same; Prepare and send email to Attorney Sydney Simmons for final approval of motion and exhibits	0.50	50.00
04/04/2023	PGG: Read and respond to email from Attorney Sydney Simmons about Motion to Compel In Person Mediation	0.10	32.50
04/06/2023	SC: Review request for copies from plaintiffs' counsel; Update case diary	0.10	10.00
04/06/2023	SC: Revise non-party subpoenas and HIPAA notices for update records for Williams and Greene and prepare for serving; Update case diary	0.50	50.00
04/06/2023	PGG: Review and execute records Subpoenas	0.15	48.75
04/07/2023	SMS: Discussion with Paralegal Shannon Crandall re proposal for settlement and edits to same; Forward email to Attorney Patrick Gilligan re same	0.20	65.00
04/10/2023	SMS: Email correspondence with Richard Dennis and City Attorney re telephone conference; Telephone conference with City Attorney and Richard Dennis explaining billing expert and discussing strategy for contract for same; Follow up email to Attorney Patrick Gilligan re same	0.45	146.25

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DATE	DESCRIPTION	HOURS	AMOUNT
04/10/2023	PGG: Office conference with Attorney Sydney Simmons about medical billing expert, Motion to Compel Mediation and Motion to Continue if necessary depending on mediation motion	0.25	81.25
04/10/2023	SMS: Office conference with Attorney Patrick Gilligan about medical billing expert, Motion to Compel Mediation and Motion to Continue if necessary depending on mediation motion	0.25	81.25
04/11/2023	PGG: Draft email to Attorney Sydney Simmons about Intake expert contract	0.10	32.50
04/11/2023	SMS: Review and respond to emails from Attorney Patrick Gilligan and Allegiant experts re contract with City of Ocala; Send required contract edits to Allegiant	0.20	65.00
04/14/2023	SMS: Review edited contract from Allegiant Experts; Email to City Attorney for approval and forwarding to City Procurement	0.30	97.50
04/17/2023	SMS: Instruct Paralegal to finalize Boucher interrogatory responses by tomorrow to send to Client for signature	0.10	32.50
04/18/2023	SMS: Instruct Paralegal to draft Proposed Order on Motion to Compel In Person Mediation	0.10	32.50
04/19/2023	SC: Office conference with Attorney Sydney Simmons regarding case status;	0.10	10.00
04/20/2023	SC: Prepare and send follow up email to Attorney Udell's office regarding status of HIPAA releases to be executed by plaintiffs; Update case diary	0.10	10.00
04/20/2023	SC: Email exchange with Attorney Sydney Simmons regarding motion to compel and response deadline	0.10	10.00
04/20/2023	SC: Review update records from OFMC; Upload same into CM; Update case diary	0.30	30.00
04/21/2023	PCE: Work on Interrogatory Answers pertaining to expert witness, Allegiant	0.30	30.00
04/21/2023	SC: Review file; Prepare draft answers to expert interrogatories; Prepare and send email to Jackie at PMA regarding use of billing expert; Prepare and send email to Attorney Chris Anderson regarding his use of billing expert; Prepare and send email to Attorney Sydney Simmons and Attorney Patrick Gilligan submitting draft answers	2	200.00
04/21/2023	SC: Office conferences with Paralegal Patti Eining regarding their use of billing expert; Review email and answers from Paralegal Patti Eining; Update answers to expert interrogatories; Prepare and send email to Attorney Sydney Simmons and Attorney Patrick Gilligan attaching same	0.50	50.00
04/21/2023	SC: Review email instruction from Attorney Victoria Cortez; Review file and confirm all files in Dropbox folder; Revise compliance with request for copies; File and serve same; Prepare and send service email to opposing counsel with Dropbox link; Update case diary	0.50	50.00
04/21/2023	SC: Review order granting motion to compel; Review court file and office file to confirm receipt of interrogatory answers and no receipt of responses to request to produce; Prepare and send email to Attorney Patrick Gilligan regarding same; Update case diary	0.30	30.00
04/24/2023	SMS: Review and edit Paralegal Shannon Crandall's draft Notice of Serving Answers to Interrogatories; Email correspondence re same	0.20	65.00
04/24/2023	SMS: Review statute for permitted amount to charge for medical records and email correspondence with Paralegal and Attorney Patrick Gilligan re same	0.10	32.50

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DATE	DESCRIPTION	HOURS	AMOUNT
04/24/2023	SMS: Review Paralegal Shannon Crandall's draft Answers to Expert Interrogatories; Edit same; Discussion with Paralegal Shannon Crandall re procedure for same; Review rule for signing authority; Instruct Paralegal to send Interrogatories to Richard Dennis to sign	0.60	195.00
04/24/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise answers to interrogatories; Prepare and send email to Attorney Sydney Simmons attaching same for completion	0.30	30.00
04/24/2023	SC: Office conference with Attorney Sydney Simmons and phone conference with Attorney Patrick Gilligan regarding case status	0.10	10.00
04/24/2023	SC: Review email from Attorney Sydney Simmons; Revise answers to expert interrogatories; Prepare and send email to Richard Dennis attaching same for execution; Prepare notice of serving answers; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval; Update case diary	0.50	50.00
04/25/2023	SMS: Review and approve draft good faith letter for failure to comply with discovery requests	0.15	48.75
04/25/2023	PGG: Telephone conference with Attorney Sydney Simmons and Paralegal about records subpoena to Sarasota Memorial	0.10	32.50
04/25/2023	PGG: Office conference with Attorney Sydney Simmons about billing expert, Plaintiffs' overdue discovery and un-responded to motions and Court Orders	0.35	113.75
04/25/2023	SMS: Discussion with Attorney Patrick Gilligan re fees for obtaining medical records from hospital; Instruct Paralegal Shannon Crandall to call hospital to request electronic version of records and confirm cost; Follow up emails to Paralegal re next steps for drafting Motion based on Plaintiffs' failure to comply with Court's Order on Motion to Compel	0.45	146.25
04/25/2023	SMS: Review emails from Paralegal re Plaintiffs' failure to comply with discovery order; Discussion with Attorney Patrick Gilligan re filing Motion for Sanctions; Draft Motion for Sanctions for failure to comply with discovery order; Send to Attorney Patrick Gilligan for review	0.85	276.25
04/25/2023	SC: Review email instruction from Attorney Patrick Gilligan and Attorney Sydney Simmons; Prepare good faith letter as to Plaintiff's failure to respond to 2nd request to produce after entry of order; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval	0.20	20.00
04/25/2023	SC: Review email from Attorney Sydney Simmons; Revise good faith letter; Prepare and send email attaching same to opposing counsel; Update case diary; Calendar 5 day response deadline	0.30	30.00
04/26/2023	SC: Review email and attached, executed answers to interrogatories from Richard Dennis; Revise notice of serving answers; File and serve same; Prepare and send service email attaching answers to opposing counsel; Update case diary	0.50	50.00
04/26/2023	SC: Review incoming update records from ORMC for Rachelle Williams and Ocala Family Medical for William Greene; Update file and case diary	0.30	30.00
04/27/2023	PGG: Read and respond to email from City Attorney Will Sexton about execution of contract for hiring expert	0.15	48.75
04/27/2023	PGG: Proof Motion for Sanctions for Plaintiff's failure to provide discovery	0.10	32.50
04/28/2023	SC: Prepare and send email to JA requesting hearing dates/times for hearing on motion to compel mediation; Update case diary	0.10	10.00

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DATE	DESCRIPTION	HOURS	AMOUNT
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Subtotal: 2,947.50

===== Expenses

04/20/2023	Ocala Family Medical Center: Radiology CD for William Greene		10.00
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Subtotal: 10.00

Hours Summary:

- SMS- PGG (SMS): 5.05h @\$325.00 = \$1,641.25
- SC- PGG (SC): 7.40h @\$100.00 = \$740.00
- Patrick Gilligan (PGG): 1.65h @\$325.00 = \$536.25
- PCE- CAA (PCE): 0.30h @\$100.00 = \$30.00

BALANCE DUE

\$2,957.50

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