

**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: 4/6/2023

<b>Invoice</b>	<b>Matter</b>	<b>Fees</b>	<b>Expenses</b>	<b>Amount</b>
65838	American Humanist Assn	\$1,138.75	\$0.00	\$1,138.75
65839	Brown, William Samuel (L003358033)	\$3,821.25	\$777.50	\$4,598.75
65840	Harris, Emily and Aron (L003591568)	\$1,247.50	\$290.98	\$1,538.48
65841	Hernandez, Pedro	\$831.25	\$0.00	\$831.25
65842	Melkonian	\$10.00	\$0.00	\$10.00
65843	Secki	\$382.50	\$50.75	\$433.25
65844	Shadow Oaks	\$48.75	\$0.00	\$48.75
65845	Williams and Greene (L003434864)	\$14,895.00	\$1,070.00	\$15,965.00
<i>Total</i>		\$22,375.00	\$2,189.23	\$24,564.23

**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 # 65838**

**DATE 03/31/2023**

**MATTER**

American Humanist Assn

**CLAIM #**

L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
03/06/2023	PGG: Read email from Attorney Southerland about denial of Petition for Certiorari; Draft email to her about same; Review dissenting opinions; Draft email to City Attorney Will Sexton and Mayor Kent Guinn about same; Draft Council Memorandum about case status; Read and respond to email from ACE adjuster about case status; Telephone conference with City Attorney Will Sexton about informing Council	2.30	747.50
03/06/2023	SC: Review email instruction from Attorney Patrick Gilligan; Revise council memo report; Prepare and send email to Attorney Patrick Gilligan attaching same; Update case diary	0.40	40.00
03/07/2023	PGG: Review Public Records Act request for shade meeting transcripts; Draft email to City Clerk Angel Jacobs and City Attorney Will Sexton about declining to provide same until the conclusion of the litigation; Office conference with Paralegal about city attorney contact	0.45	146.25
03/07/2023	SC: Review public records request for all shade transcripts; Prepare and send email to City Clerk Angel Jacobs regarding ongoing litigation	0.20	20.00
03/14/2023	SC: Review email from Attorney Patrick Gilligan; Review order lifting stay; Prepare and send update email with attached order to PMA and Risk	0.20	20.00
03/14/2023	SC: Review email instruction from Attorney Patrick G. Gilligan; Revise status letter to council; Prepare and send email to Attorney Patrick Gilligan attaching same for final approval	0.30	30.00
03/14/2023	PGG: Revise letter to Council about Supreme Court denial of certiorari	0.20	65.00
03/15/2023	SC: Email exchange with Lora at Chubb regarding case status	0.10	10.00
03/15/2023	SC: Review and respond to email from Attorney Patrick Gilligan regarding letter to council members	0.10	10.00
03/15/2023	SC: Review email instruction from Attorney Patrick Gilligan; Revise	0.50	50.00

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

DATE	DESCRIPTION	HOURS	AMOUNT
------	-------------	-------	--------

	status letter; Prepare and send email attaching letter and order to each councilmember with a copy to Attorney Patrick Gilligan, City Attorney Sexton and City Manager Pete Lee		
--	---	--	--

Subtotal: 1,138.75

---

Hours Summary:

- Patrick Gilligan (PGG): 2.95h @\$325.00 = \$958.75

- SC- PGG (SC): 1.80h @\$100.00 = \$180.00

BALANCE DUE

**\$1,138.75**

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

**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 # 65839**

**DATE 03/31/2023**

**MATTER**

Brown, William Samuel (L0033...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
03/01/2023	SC: Email exchange with Phyllis with Apex Process Service regarding updated location information for Dr. Velez	0.20	20.00
03/06/2023	PGG: Draft email to Attorney Victoria Cortez and Paralegal about upcoming expert depositions; Office conference with Attorney Sydney Simmons and Attorney Victoria Cortez about upcoming expert depositions	0.50	162.50
03/06/2023	SMS: Office conference with Attorney Patrick Gilligan and Attorney Victoria Cortez re form for expert depositions and applying same to expert depositions scheduled on Thursday	0.75	243.75
03/07/2023	SC: Review email from Phyllis with Apex Process Service attaching return of service and invoice for Dr. Baxter; Review email from Phyllis with Apex Process Service attaching return of service and invoice for Dr. Bohsali; Review email from Phyllis with Apex Process Service attaching return of service and invoice for Dr. Velez; File returns for service on Dr. Baxter and Dr. Velez; Prepare and send email to Attorney Patrick Gilligan regarding invoices for payment	0.50	50.00
03/07/2023	VC: Began review of medical records in preparation for Deposition of Dr. Velez on March 9, 2023; Office conference with Paralegal Shannon Crandall regarding same	1.30	422.50
03/07/2023	PGG: Read and respond to email from Paralegal about treating physician set for deposition apparently having left her employment and moved out of the country; Instructions to Paralegal about doing search for service	0.35	113.75
03/07/2023	SC: Office conference with Attorney Victoria Cortez regarding confirmation with witnesses; Call to Halifax Neurosurgery regarding Dr. Baxter; Review PeopleMap report regarding Dr. Baxter; Attempt phone call to Dr. Baxter; Emails to Attorney Gilligan	0.70	70.00
03/07/2023	SMS: Office conferences with Paralegal Shannon Crandall re expert depositions set for Thursday and locating Dr Baxter for same; Discussion with Attorney Victoria Cortez re tasks for deposition preparation	0.30	97.50

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

DATE	DESCRIPTION	HOURS	AMOUNT
03/08/2023	SC: Review and respond to email from court reporter confirming depo of Dr. Velez; Call and emails to Attorney Bloom's office and Esquire solutions to cancel deposition of Dr. Baxter; Review and respond to message from Attorney Sydney Simmons regarding same	0.40	40.00
03/09/2023	SMS: Prepare for deposition of Dr. Velez from Hospice; Office conferences with Attorney Patrick Gilligan re strategy for same; Office conferences and emails with Paralegal Shannon Crandall re documents as exhibits for same	2.50	812.50
03/09/2023	SMS: Attend video deposition of Dr. Velez; Follow up with Attorney Patrick Gilligan re same	1.80	585.00
03/09/2023	SC: Review and respond to email from opposing counsel; Prepare notice canceling deposition; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval	0.50	50.00
03/09/2023	SC: Office conference with Attorney Sydney Simmons regarding cancellation notice; Revise notice cancelling deposition of Dr. Baxter; Review email approval from Attorney Sydney Simmons; File notice with Clerk and serve on opposing counsel	0.50	50.00
03/09/2023	PGG: Office conference with Attorney Sydney Simmons about deposition of Hospice doctor who determined cause of death; Office conference with Attorney Sydney Simmons about Deposition and doctor's opinion	0.50	162.50
03/09/2023	SC: Prepare exhibits for deposition of Dr. Velez	0.50	50.00
03/09/2023	SC: Attend deposition of Dr. Vilmarie Velez	1.60	160.00
03/14/2023	SMS: Email instructions to Paralegal Shannon Crandall re setting deposition of next expert	0.10	32.50
03/14/2023	PGG: Read and respond to email from Attorney Sydney Simmons about Motion to Continue to locate neurologist	0.10	32.50
03/15/2023	SC: Review email from Attorney Sydney Simmons; Online research regarding Dr. Heather Schweizer to determine specialty and current practice location; Email to Attorney Sydney Simmons regarding same; Prepare and send email of possible deposition dates and times of Dr. Schweizer to opposing counsel	0.50	50.00
03/15/2023	SMS: Review and respond to email from Paralegal Shannon Crandall enclosing drafted Notice of Deposition for Heather Schweizer; Edit Notice	0.25	81.25
03/15/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare notice and subpoena for deposition of Dr. Schweizer; Prepare and send email to Attorney Sydney Simmons attaching same for review and approval	0.50	50.00
03/15/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise notice and file/serve same; Revise subpoena; Prepare and send email to process server attaching same for rush service; Update case diary	0.50	50.00
03/16/2023	SMS: Review email of service of interrogatories from Plaintiff regarding experts; Instructions to Paralegal Shannon Crandall to download and calendar response dates	0.20	65.00
03/16/2023	SMS: Review voicemail from Dr. Schweizer's assistant Susanne Ritterhoff re questions for document production; Telephone conference following up with Ms. Ritterhoff re same	0.20	65.00
03/17/2023	SC: Review email instruction from Attorney Sydney Simmons; Review Boecher interrogatories to doctors (7), Boecher request to produce, expert interrogatories and expert request to produce;	0.50	50.00

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

DATE	DESCRIPTION	HOURS	AMOUNT
	Calendar deadlines for all; Update case diary		
03/17/2023	SMS: Telephone conference with Heather Schweizer, MD re deposition	0.10	32.50
03/18/2023	PGG: Review and approve court reporter payment of Plaintiffs depositions	0.10	32.50
03/18/2023	SC: Review return of service from process server and file/serve same; Prepare and send email to court reporter scheduling court reporter and videographer for deposition; Update caser diary	0.40	40.00
03/21/2023	PGG: Office conference with Paralegal and Attorney Sydney Simmons about neurologist deposition and supplementing records for Motion for Summary Judgment	0.20	65.00
03/21/2023	SC: Office conference with Attorney Patrick Gilligan and Attorney Sydney Simmons about neurologist deposition and supplementing records for Motion for Summary Judgment	0.20	20.00
03/21/2023	SMS: Office conference with Paralegal and Attorney Patrick Gilligan about neurologist deposition and supplementing records for Motion for Summary Judgment	0.20	65.00
			Subtotal: 3,821.25
	===== Expenses		
03/15/2023	Apex Process Service: Rush serve Dr. Vilmarie Velez		135.00
03/15/2023	Apex Process Service: Rush serve Dr. Silvia Baxter		100.00
03/15/2023	Apex Process Service: Rush serve Dr. Bohsali		90.00
03/20/2023	Apex Process Service: Rush serve Dr. heather Schweizer		90.00
03/24/2023	Owen & Associates: Video depo of Dr. Velez		362.50
			Subtotal: 777.50
	===== Services (Not Billed)		
03/06/2023	VC: Office conference with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding preparation of deposing expert witnesses	0.50	0.00
03/07/2023	VC: Office conference with Attorney Sydney Simmons regarding status of depositions of expert witnesses on March 9, 2023	0.10	0.00
			Subtotal: 0.00

Hours Summary:

- SMS- PGG (SMS): 6.40h @\$325.00 = \$2,080.00
- SC- PGG (SC): 7.50h @\$100.00 = \$750.00
- Patrick Gilligan (PGG): 1.75h @\$325.00 = \$568.75
- VC- PGG (VC): 1.30h @\$325.00 = \$422.50

BALANCE DUE

**\$4,598.75**

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

**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 # 65840**

**DATE 03/31/2023**

**MATTER**

Harris, Emily and Aron (L003...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
03/14/2023	PGG: Review and approve invoices for production of medical bills	0.10	32.50
03/15/2023	SC: Review medical records from Dr. Goldstein and Family Care Specialists; Upload same into CaseMap; Prepare and send email to Attorney Victoria Cortez regarding same	0.50	50.00
03/15/2023	VC: Reviewed and responded to email sent from Paralegal Shannon Crandall regarding receipt of medical records from Goldstein and requested follow up regarding all outstanding medical records	0.10	32.50
03/16/2023	SC: Review medical records from Gastroenterology/Endoscopy Center; Upload same into CaseMap; Prepare and send email to Attorney Victoria Cortez regarding same; Update case diary	0.50	50.00
03/21/2023	PGG: Office conference with Paralegal and Attorney Victoria Cortez about mediation	0.10	32.50
03/21/2023	SC: Office conference with Attorney Patrick Gilligan and Attorney Victoria Cortez about mediation	0.10	10.00
03/21/2023	VC: Office conference with Paralegal Shannon Crandall and Attorney Patrick Gilligan regarding upcoming mediation	0.10	32.50
03/31/2023	VC: Office conference with Attorney Patrick Gilligan regarding preparation for upcoming depositions of Plaintiffs	0.40	130.00
03/31/2023	PGG: Office conference with Attorney Victoria Cortez about deposition	0.40	130.00
03/31/2023	VC: Completed review/casemap of Plaintiff Emily Harris' medical records from: Dr. Byrd, Chandra Smile, Orthopedic Surgery Center, and Ritz and Johnson	2.30	747.50
			Subtotal: 1,247.50
	===== Expenses		
03/15/2023	SHARECARE HEALTH DATA SERVICES: Medical records-Orthopedic Institute		65.99
03/15/2023	SHARECARE HEALTH DATA SERVICES: Medical records-Family Care Specialists		184.99

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

DATE	DESCRIPTION	HOURS	AMOUNT
03/16/2023	Endoscopy Center of Ocala: Medical records for Emily Harris		40.00
			Subtotal: 290.98

Hours Summary:

- VC- PGG (VC): 2.90h @\$325.00 = \$942.50
- Patrick Gilligan (PGG): 0.60h @\$325.00 = \$195.00
- SC- PGG (SC): 1.10h @\$100.00 = \$110.00

BALANCE DUE

**\$1,538.48**

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

**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 # 65841**

**DATE 03/31/2023**

**MATTER**

Hernandez, Pedro

**CLAIM #**

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
03/15/2023	SC: Review order scheduling case management; Prepare and send email to Attorney Victoria Cortez regarding same	0.10	10.00
03/15/2023	VC: Reviewed and responded to emails from Paralegal Shannon Crandall and Attorney Gwendolyn Williams regarding upcoming Case Management Conference, Trial dates, and Opposing Counsel's obligation to submit proposed order on Defendant's Motion for Summary Judgment	0.20	65.00
03/15/2023	VC: Drafted email to opposing counsel regarding status of Proposed Order denying Defendant's Motion for Summary Judgment that was to be submitted by Plaintiff	0.20	65.00
03/16/2023	VC: Reviewed and revised Plaintiff's Proposed Order on Defendant's Motion for Summary Judgment; Emailed opposing counsel regarding same	0.20	65.00
03/17/2023	SC: Review emails from Attorney Victoria Cortez and Attorney Gwen Williams; Calculate deadline for trial term stipulation; Calendar same and update case diary; Review order and possible trial term dates; Prepare and send email to opposing counsel regarding same	0.50	50.00
03/18/2023	PGG: Review Case Management Order to set trial date; Instructions to Paralegal about Update case diary	0.20	65.00
03/20/2023	SC: Review and respond to Attorney Patrick Gilligan regarding case management conference and mediation details; Update calendar	0.10	10.00
03/20/2023	SC: Review email instruction from Attorney Gwen Williams; Update service list with e-portal; Prepare and send email to Attorney Gwen Williams regarding same	0.20	20.00
03/21/2023	SC: Prepare and send follow up email to opposing counsel regarding stipulation to trial term	0.10	10.00
03/23/2023	VC: Reviewed correspondence from opposing counsel regarding submission of the proposed order on Defendant's Motion for Summary Judgment	0.10	32.50

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

DATE	DESCRIPTION	HOURS	AMOUNT
03/24/2023	SC: Phone call with opposing counsel regarding pretrial and trial term dates; Prepare stipulation to trial term; Prepare and send email to Attorney Victoria Cortez attaching same; Update calendar with pretrial and trial dates	0.50	50.00
03/24/2023	VC: Reviewed and revised trial stipulation	0.10	32.50
03/24/2023	SC: Review email instruction from Attorney Victoria Cortez; Prepare and send email to Attorney Booze with Morgan and Morgan to approve stipulation	0.10	10.00
03/24/2023	SC: Review email approval from Attorney Booze; Revise stipulation and file and serve same; Prepare and send email to JA attaching copy of filed version and requesting confirmation of canceled case management	0.50	50.00
03/24/2023	SC: Review email from JA confirming case management conference is canceled; Forward same to opposing counsel; Update case diary	0.10	10.00
03/27/2023	PGG: Review and Calendar trial and Pretrial Conference Stipulation dates	0.15	48.75
03/28/2023	PGG: Review Case Management Conference and Trial Order; Instructions to Paralegal to calendar all due dates	0.50	162.50
03/28/2023	SC: Review Order Scheduling Pretrial Conference and Jury Trial; Calculate and calendar all deadlines; Update case diary; Prepare and send email to client attaching same	0.75	75.00

Subtotal: 831.25

Hours Summary:

- SC- GPW (SC): 2.85h @\$100.00 = \$285.00
- Patrick Gilligan (PGG): 0.85h @\$325.00 = \$276.25
- VC GPW (VC): 0.80h @\$325.00 = \$260.00
- SC- PGG (SC): 0.10h @\$100.00 = \$10.00

BALANCE DUE

**\$831.25**

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

**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 #** 65842

**DATE** 03/31/2023

---

**MATTER**

Melkonian

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
03/21/2023	SC: Review email instruction from Attorney Patrick Gilligan; Upload document into CaseMap; Prepare and send email to Attorney Patrick Gilligan regarding same	0.10	10.00
			Subtotal: 10.00

---

Hours Summary:

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

**BALANCE DUE**

**\$10.00**

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

**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 # 65843**

**DATE 03/31/2023**

**MATTER**

Secki

**CLAIM #**

L003387896

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
03/02/2023	SC: Review medical records from CareFirst Imaging; Review email instruction from Attorney Patrick Gilligan; Prepare and send email to office manager regarding payment for medical records; Prepare and send email to Attorney Victoria Cortez regarding medical records received	1	100.00
03/13/2023	SC: Review Publix pharmacy records; Look up/research prescribed medications and locations of providers; Prepare and send email to Attorney Victoria Cortez regarding same	1	100.00
03/13/2023	VC: Reviewed email from Paralegal Shannon Crandall regarding providers not previously disclosed by Plaintiff as evidenced by his Publix Pharmacy Records; Began cursory review of Publix Records to understand Paralegal Shannon Crandall's email regarding same; Emailed instructions to Paralegal to issue Notice of Production to Non Parties to undisclosed doctors listed in records	0.30	97.50
03/16/2023	SC: Review email with Secki's answers to interrogatories; Prepare and send email to Attorney Patrick Gilligan regarding signature not notarized; Update case diary	0.20	20.00
03/17/2023	PGG: Review answers to Second Interrogatories and Instructions to Paralegal about preparing Notice of Production from Non-Party on same	0.20	65.00
			Subtotal: 382.50
	===== Expenses		
03/02/2023	CareFirst Imaging: CareFirst Imaging medical records		15.00
03/31/2023	Langley Health Services: Medical records		35.75
			Subtotal: 50.75

Hours Summary:

- SC- PGG (SC): 2.20h @\$100.00 = \$220.00  
- VC- PGG (VC): 0.30h @\$325.00 = \$97.50

**BALANCE DUE**

**\$433.25**

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

- Patrick Gilligan (PGG): 0.20h @\$325.00 = \$65.00

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

**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 # 65844**

**DATE 03/31/2023**

**MATTER**

Shadow Oaks

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/23/2023	PGG: Office conference with Paralegal about status of collection of awarded fees and costs	0.15	48.75

Subtotal: 48.75

Retainer information:

+ Previous account balance: \$0.00  
+ New charges: \$48.75  
- Previous retainer balance: \$0.00  
- Payment made from retainer: \$0.00  
= New account balance: \$48.75  
= New retainer balance: \$0.00

**BALANCE DUE**

**\$48.75**

Hours Summary:

- Patrick Gilligan (PGG): 0.15h @\$325.00 = \$48.75

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

**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 # 65845**

**DATE 03/31/2023**

**MATTER**

Williams and Greene (L003434...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
03/01/2023	SMS: Follow up telephone conference with Ashley Brown re status of decision on accident reconstructionist versus IME	0.10	32.50
03/02/2023	SMS: Discussion with Attorney Patrick Gilligan re depositions next week; Discussion with Paralegal Shannon Crandall re tasks for depositions; Follow up email to Attorney Victoria Cortez and Paralegal Shannon Crandall re status meeting for case and office conference with same re tasks to prepare for depositions	0.35	113.75
03/02/2023	VC: Office conference with Attorney Sydney Simmons and Paralegal Shannon Crandall regarding preparation for upcoming depositions	0.20	65.00
03/02/2023	SC: Office conference with Attorney Sydney Simmons and Attorney Victoria Cortez regarding upcoming deposition and pending medical records	0.20	20.00
03/02/2023	SC: Review and respond to email from Attorney Victoria Cortez and attached ISO report; Prepare and send email to Jackie and Ashley with PMA regarding previous claims on report	0.30	30.00
03/02/2023	PGG: Office conference with Attorney Sydney Simmons about possible Compulsory Medical Examination and billing expert	0.35	113.75
03/02/2023	VC: Office conference with Attorney Patrick Gilligan regarding deposition questions in light of potential expert witnesses	0.20	65.00
03/02/2023	VC: Reviewed amended notice of taking deposition for filing	0.10	32.50
03/02/2023	SMS: Review case status and upcoming deadlines; Discussion with Attorney Patrick Gilligan re contacts at City to get permission for IME versus accident reconstructionist; Discussion with Attorney Patrick Gilligan re medical bills expert; Follow up with Attorney Christopher Anderson re estimated costs for medical bills expert; Email to Jackie Flowers with PMA re advice for IME versus medical bills expert or accident reconstructionist; Email instructions to Paralegal Shannon Crandall to draft medical records release for Plaintiffs to sign at next week's depositions	0.60	195.00

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

DATE	DESCRIPTION	HOURS	AMOUNT
03/02/2023	SMS: Review and respond to email from Attorney Victoria Cortez re criminal history of Williams	0.10	32.50
03/02/2023	VC: Researched criminal history of Plaintiff Greene; Email to Attorney Sydney Simmons regarding same	0.40	130.00
03/02/2023	VC: Drafted deposition outline for Plaintiff Williams' deposition; Reviewed Plaintiff's Answers to Interrogatories, Response to Request to Produce, Complete Risk File, and Photos to be able to draft deposition outline; Reviewed Plaintiff Williams' criminal history in preparation for same	3.60	1,170.00
03/02/2023	SC: Email exchange with opposing counsel and Attorney Victoria Cortez and Attorney Sydney Simmons regarding requested change in time of deposition; Call to court reporter regarding same; Prepare amended notice and send to Attorney Victoria Cortez for approval; Review approval email from Victoria Cortez; File amended notice and serve on opposing counsel; Prepare and send email to court reporter attaching same; Update case diary	1	100.00
03/03/2023	VC: Updated deposition outline for Plaintiff Williams	0.80	260.00
03/06/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare medical release for Rachelle Williams and medical release for William Greene; Prepare and send email to Attorney Sydney Simmons attaching both for review and approval	0.50	50.00
03/06/2023	PGG: Review Order on Motion to Compel; Instructions to Paralegal	0.15	48.75
03/06/2023	SMS: Telephone conference with Richard Dennis re medical billing expert versus IME; Follow up with Attorney Patrick Gilligan re same; Email instructions to Paralegal Shannon Crandall to coordinate with medical billing expert company, Allegiant, to set up consultation	0.30	97.50
03/06/2023	SMS: Begin preparation for deposition; Begin drafting deposition outline; Emails to Paralegal Shannon Crandall and Attorney Patrick Gilligan re following up on discovery requests to Greene	0.70	227.50
03/07/2023	SC: Office conference with Attorney Sydney Simmons regarding deposition of William Greene and possible exhibits for same; Review CaseMap and prepare document report for review	0.30	30.00
03/07/2023	SC: Office conference with Attorney Victoria Cortez regarding deposition of Rachelle Williams and possible exhibits for same; Review CaseMap and prepare document report for review; Call to Jackie at PMA regarding ISO report results; Follow up office conference with Attorney Victoria Cortez regarding same	0.50	50.00
03/07/2023	SC: Review file and discovery responses from plaintiffs; Prepare and send email to opposing counsel regarding status of verified answers	0.20	20.00
03/07/2023	VC: Office conference with Paralegal Shannon Crandall regarding ISO reports and prior claims involving plaintiff Williams; Reviewed email correspondence from Claim Representative Jack Flowers regarding information pertaining to same	0.30	97.50
03/07/2023	VC: Office conference with Attorney Sydney Simmons regarding exhibits to be used in Plaintiffs' depositions on 3/8/2023	0.10	32.50
03/07/2023	SC: Prepare exhibits for depositions of Williams and Greene	1	100.00
03/07/2023	SC: Email exchange with opposing counsel regarding medical records and request for copies; Prepare records link; Review request for copies and provide records link to opposing counsel; Prepare compliance with request for copies; Prepare and send email to Attorney Gilligan to review and approve same	1	100.00
03/07/2023	SMS: Prepare for deposition and draft deposition outline; Discussion	0.75	243.75

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

DATE	DESCRIPTION	HOURS	AMOUNT
03/08/2023	with Paralegal Shannon Crandall re exhibits for deposition SMS: Prepare for and take deposition of Plaintiff Greene; Follow up with Attorney Patrick Gilligan, Attorney Victoria Cortez, and Paralegal Shannon Crandall re next steps	2.50	812.50
03/08/2023	SC: Attend deposition of Rachelle Williams	2.30	230.00
03/08/2023	SC: Attend deposition of William Greene	1.80	180.00
03/08/2023	SC: Revise HIPAA releases and send email attaching same to Attorney Udell	0.20	20.00
03/08/2023	VC: Prepare for Plaintiff Williams' Deposition	0.60	195.00
03/08/2023	VC: Attend and conduct deposition of Plaintiff Williams' Deposition	2.30	747.50
03/08/2023	VC: Office conference with Attorneys Patrick Gilligan and Sydney Simmons and Paralegal Shannon Crandall regarding depositions, status of case, follow up tasks needed, records outstanding, and overall case strategy	0.80	260.00
03/08/2023	PGG: Office conference with Attorney Sydney Simmons and Attorney Victoria Cortez about depositions; upcoming mediation and mediation summary to Risk; Office conference with Attorney Sydney Simmons about Partial Motion for Summary Judgment on lost wage claim	0.35	113.75
03/09/2023	SC: Review email instruction from Attorney Sydney Simmons regarding medical billing expert; Office conference with Paralegal Patti Eining regarding same; Prepare and send email to medical billing expert regarding services	0.30	30.00
03/10/2023	SMS: Review email from Allegiance for billing expert fees and retainer agreement; Instruct Paralegal Shannon Crandall to send information necessary to sign agreement with Allegiance	0.20	65.00
03/10/2023	SC: Review email instruction from Attorney Sydney Simmons; Review file and prepare response to billing expert	0.50	50.00
03/10/2023	SMS: Email to Attorney Victoria Cortez re requesting draft of Motion for Partial Summary Judgment as to Plaintiffs' claims for lost wages or ability to earn	0.10	32.50
03/13/2023	VC: Read and responded to email correspondence from Attorney Sydney Simmons regarding Motion for Partial Summary Judgment regarding lost wage claims; Emailed instructions to Paralegal Shannon Crandall regarding ordering Plaintiffs' Deposition Transcripts	0.20	65.00
03/13/2023	SC: Review email from Attorney Patrick Gilligan; Prepare and send email to court reporter requesting depo transcripts of Williams and Greene; Update case diary	0.30	30.00
03/13/2023	PGG: Review expert Interrogatories	0.10	32.50
03/14/2023	SC: Email exchange with medical billing expert regarding meeting, engagement letter and retainer	0.20	20.00
03/14/2023	SMS: Review emails between Paralegal Shannon Crandall and Allegiant as billing expert; Discussion with and email instructions to Paralegal Shannon Crandall to forward retainer agreement for expert to Richard Dennis and request Richard Dennis to pay for Allegiant's services	0.15	48.75
03/14/2023	SC: Review email from Allegiant with attachments; Prepare and send email to Attorney Patrick Gilligan regarding invoice from Allegiant; Office conference with Attorney Sydney Simmons regarding same; Prepare and send email to Richard Dennis and Jackie Flowers regarding invoice from expert and other documents	0.40	40.00

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

DATE	DESCRIPTION	HOURS	AMOUNT
	received		
03/14/2023	SC: Review Risk file for documents requested from expert; Prepare and send email to Jackie Flowers requesting demand letter for Rachelle Williams	0.40	40.00
03/14/2023	SC: Email exchange with court reporter regarding depo transcript order for deposition of Williams and Greene	0.10	10.00
03/15/2023	VC: Reviewed Plaintiff Williams' Answer to Defendant's 2nd Interrogatories	0.10	32.50
03/16/2023	SC: Review supplemental interrogatory response; Prepare and send email to Attorney Patrick Gilligan regarding signature missing on supplemental answer	0.10	10.00
03/16/2023	SC: Review and respond to email from Attorney Sydney Simmons regarding notarized supplemental answer	0.10	10.00
03/16/2023	SMS: Review email from Paralegal Shannon Crandall re Plaintiffs' failure to notarize interrogatory responses and instruct Paralegal Shannon Crandall to email opposing counsel re same	0.15	48.75
03/17/2023	PGG: Review unexecuted supplemental Interrogatories response; Draft email to Attorney Sydney Simmons and Paralegal about contract schedule the Plaintiff is referring to; Instructions to Paralegal about Request to Produce for contract schedule; Review Plaintiff's expert and witness list; Instructions to Paralegal	0.50	162.50
03/17/2023	SC: Review email instruction from Attorney Patrick Gilligan; Review plaintiff exhibit and witness list and expert interrogatories to City; Calendar deadline for response to interrogatories; Update case diary	0.30	30.00
03/17/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare and send email to opposing counsel requesting verified answers to interrogatories	0.10	10.00
03/20/2023	SC: Review email from court reporter and attached Williams and Greene depo transcripts; Prepare and send email to Attorney Victoria Cortez and Attorney Sydney Simmons regarding same	0.20	20.00
03/21/2023	PGG: Office conference with Paralegal, Attorney Victoria Cortez and Attorney Sydney Simmons about mediation statement, Motion for Summary Judgment and updating discovery for PIP and Med Pay	0.20	65.00
03/21/2023	SC: Office conference with Attorney Patrick Gilligan, Attorney Victoria Cortez and Attorney Sydney Simmons about mediation statement, Motion for Summary Judgment and updating discovery for PIP and Med Pay	0.20	20.00
03/21/2023	VC: Office conference with Attorney Patrick Gilligan and Paralegal Shannon Crandall and Attorney Sydney Simmons regarding mediation statement, Motion for Summary Judgment, and updating discovery for PIP and Med Pay	0.20	65.00
03/21/2023	SC: Attend meeting with Jessica Schmor (billing expert), Attorney Victoria Cortez and Attorney Sydney Simmons	0.50	50.00
03/21/2023	VC: Attended Virtual meeting with expert from Allegiant, Medical Billing Experts, regarding overview of experts and general information that relates to the work to be performed in this case, along with Paralegal Shannon Crandall and Attorney Sydney Simmons	0.50	162.50
03/21/2023	VC: Office conference with Paralegal Shannon Crandall regarding Plaintiffs' Verified Answers to Interrogatories and obtaining Verified Answer to Supplemental Interrogatory for Plaintiff Williams	0.10	32.50

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

DATE	DESCRIPTION	HOURS	AMOUNT
03/21/2023	VC: Began draft of Motion for Partial Summary Judgment on claims relating to loss of earnings and loss of ability to earn money	0.80	260.00
03/21/2023	VC: Continued working on draft of Motion for Partial Summary Judgment on claims relating to loss of earnings and loss of ability to earn money	1	325.00
03/21/2023	SC: Review file, medical records and employment records; Prepare witness, expert witness and exhibit list; Prepare and send email to Attorney Victoria Cortez and Attorney Sydney Simmons attaching same	3.50	350.00
03/21/2023	SMS: Office conference with Paralegal, Attorney Victoria Cortez and Attorney Patrick Gilligan about mediation statement, Motion for Summary Judgment and updating discovery for PIP and Med Pay	0.20	65.00
03/22/2023	VC: Office conference with Attorney Sydney Simmons regarding preparation of mediation statement, motion for summary judgment, and upcoming mediation	0.20	65.00
03/22/2023	SMS: Review and respond to emails from Richard Dennis re providing mediation report; Office conference with Attorney Victoria Cortez re tasks for mediation and attendance for same; Begin drafting mediation statement	1	325.00
03/22/2023	SC: Review emails and instructions from Attorney Victoria Cortez, Attorney Sydney Simmons and Attorney Patrick Gilligan; Review files and medical records; As to Greene: Prepare updated notice non-party production, subpoenas, HIPAA authorization and affidavit of records custodian; Second interrogatory; Notice of serving interrogatory and HIPAA release for St. Vincent's and Medicaid; As to Williams: Prepare updated notice non-party production, subpoenas, HIPAA authorization and affidavit of records custodian, 3rd request to produce and HIPAA releases to Arizona Eye, Carondelet, El Rio, and St. Joseph's Hospital; Prepare and send email to Attorney Victoria Cortez and Attorney Sydney Simmons regarding same	2.50	250.00
03/22/2023	SC: Prepare and send follow up email to opposing counsel regarding verification of supplemental answer	0.10	10.00
03/22/2023	SC: Review email instruction from Attorney Patrick Gilligan; Review information related to billing experts; Revise witness and exhibit list; Prepare and send email to attorneys regarding same	0.40	40.00
03/23/2023	PGG: Office conference with Attorney Sydney Simmons about upcoming mediation and disclosure of billing expert	0.10	32.50
03/23/2023	VC: Reviewed and revised: NPNP Package for Plaintiff Williams, Defendant's 3rd Request to Produce to Plaintiff Williams, and 6 HIPAA Medical Releases to be signed by Plaintiff for release of medical records from out of state providers	0.70	227.50
03/23/2023	SMS: Review and respond to email from Paralegal Shannon Crandall re edits to Interrogatory and other documents to serve on Plaintiff Greene; Edit documents for finalization by Paralegal Shannon Crandall	0.25	81.25
03/23/2023	SMS: Continue drafting Mediation Summary; Review medical records to describe in Summary	1.50	487.50
03/23/2023	SC: Review email instruction from Attorney Victoria Cortez; Revise HIPAA releases for Williams (4), non-party production notice, subpoenas, HIPAA notices and records custodian affidavits; Redact information from same as to DOB and social of Ms. Williams; Revise third request to produce	1	100.00
03/23/2023	SC: Review email instruction from Attorney Sydney Simmons;	1	100.00

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

DATE	DESCRIPTION	HOURS	AMOUNT
	Revise HIPAA releases for Greene (2), non-party production notice, subpoenas, HIPAA notices and records custodian affidavits; Redact information from same as to DOB, social, FLDL of Mr. Greene; Revise notice of serving interrogatories and 2nd interrogatories		
03/23/2023	SC: Prepare and send email to opposing counsel attaching HIPAA releases (6) for execution by Plaintiffs; Update case diary for return of same	0.20	20.00
03/23/2023	SC: File and serve non-party production package for Williams, non-party production package for Greene, notice of serving interrogatories to Greene and 3rd request to produce to Williams; Prepare and send email to opposing counsel serving interrogatories; Update case diary for all items; Calendar date and create task for issuing subpoenas from non-party production, Calendar date and create task for Williams response to request to produce; Calendar date and create task for Greene deadline to file answers to interrogatories	0.60	60.00
03/23/2023	SMS: Edit Paralegal Shannon Crandall's draft witness list; Email correspondence with Paralegal Shannon Crandall re same	0.35	113.75
03/24/2023	PGG: Office conference with Attorney Victoria Cortez and Attorney Sydney Simmons about witness and exhibit disclosures and need for authenticating witness	0.35	113.75
03/24/2023	SMS: Office conference with Attorney Patrick Gilligan and Attorney Victoria Cortez re trial strategy, finalizing expert witness list, and preparing mediation statement	0.25	81.25
03/24/2023	SMS: Office conferences with Paralegal Shannon Crandall re tasks to complete witness and expert witness list; Edit the same; Review records relevant to same to add experts to list; Finalize witness list; Send to Paralegal Shannon Crandall for final edits to same and instructions to file once completed	1.30	422.50
03/24/2023	SMS: Review Plaintiffs' medical records; Review casemap status; Casemap medical records for Plaintiffs to prepare for mediation; Draft mediation summary; Edit same; Send to Attorney Patrick Gilligan and Paralegal Shannon Crandall for proof	3.70	1,202.50
03/24/2023	VC: Office conference with Attorney Patrick Gilligan regarding witness and exhibit disclosures and authentication of documents/evidence for trial	0.35	113.75
03/24/2023	SC: Office conferences with Attorney Sydney Simmons regarding witness list and radiologists on reports; Research regarding Clermont Radiology and EliteRad Group; Update witness and exhibit list	0.50	50.00
03/24/2023	SC: Review email instruction from Attorney Sydney Simmons; Revise witness and exhibit list; File and serve same; Update case diary	0.30	30.00
03/27/2023	SMS: Office conferences with Paralegal Shannon Crandall re issues with mediation and Attorney Udell requesting Zoom appearance; Telephone conference with Attorney Udell re same; Follow up telephone conferences with Richard Dennis re potential for cancelling mediation; Office conferences with Attorney Patrick Gilligan re cancelling mediation and process; Telephone conference with Mediator Harter re protocol	1.40	455.00
03/27/2023	SMS: Review and respond to City Attorney's email re risk analysis and mediation	0.25	81.25
03/27/2023	SMS: Review, edit, and email correspondence re Notice of Cancelling Mediation; Email correspondence with Mediator Harter re	0.25	81.25

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

DATE	DESCRIPTION	HOURS	AMOUNT
	same		
03/27/2023	SMS: Review emails re Motion for Partial Summary Judgment and brief discussion with Attorney Victoria Cortez re filing same	0.10	32.50
03/27/2023	SMS: Review Attorney Victoria Cortez's edits to Mediation Summary and accept changes; Email correspondence re same	0.30	97.50
03/27/2023	SC: Review email instruction from Attorney Sydney Simmons; Review and revise mediation summary; Prepare and send email to Attorney Sydney Simmons attaching same	0.30	30.00
03/27/2023	SC: Review email from mediator with Zoom link; Email exchange with Attorney Udell regarding Zoom appearance; Office conferences with Attorney Sydney Simons and Attorney Patrick Gilligan regarding same	0.50	50.00
03/27/2023	SC: Email exchange with Jackie at PMA regarding demand letter for Rachele Williams	0.10	10.00
03/27/2023	PGG: Office conference with Attorney Sydney Simmons about mediation and Plaintiff wanting to appear via Zoom; Draft email to mediator about same	0.35	113.75
03/27/2023	PGG: Proof Motion for Summary Judgment	0.25	81.25
03/27/2023	VC: Reviewed mediation statement prepared by Attorney Sydney Simmons and made suggested edits to same	0.40	130.00
03/27/2023	VC: Completed Motion for Summary Judgment; Emailed Attorney Patrick Gilligan regarding same; Emailed Paralegal Shannon Crandall regarding finalizing Motion and attaching exhibits; Reviewed finalized Motion for filing	2.90	942.50
03/27/2023	SC: Review email instruction from Attorney Victoria Cortez; Review motion for summary judgment and prepare exhibits for filing; Review exhibits and redact information within exhibits; Office conference with Attorney Victoria Cortez regarding exhibit format; Revise all, file and serve same; Prepare and send email to Richard Dennis attaching same; Update case diary	1	100.00
03/27/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare notice cancelling mediation; Email exchange with Attorney Sydney Simmons regarding same; Revise notice and file/serve same with Clerk; Prepare and send email to client attaching same; Update case diary	0.50	50.00
03/29/2023	SC: Email exchanges with Allegiant intake department regarding engagement letter and documents for review; Review engagement letter and send same to Attorney Patrick Gilligan for review and approval	0.20	20.00
03/29/2023	PGG: Office conference with Attorney Sydney Simmons about mediator's fee and motion to compel payment by Plaintiff's	0.35	113.75
03/29/2023	SMS: Email correspondence with Attorney Patrick Gilligan re Motion to Compel in person mediation; Follow up discussion with Attorney Patrick Gilligan re same; Telephone conference with Mediator Harter re status of bill for cancelled mediation and holding same until Motion to Compel Mediation is filed	0.40	130.00
03/30/2023	SC: Review file and medical records; Upload documents to share folder for billing expert; Prepare and send email to Jackie at PMA for follow up on status of demand letter	0.70	70.00
03/30/2023	SC: Review email instruction from Attorney Sydney Simmons; Review FRCP 1.700 regarding mediation; Prepare Motion to compel in-person appearance at mediation; Locate and mark proposed exhibits; Prepare and send email to Attorney Sydney Simmons	1	100.00

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

DATE	DESCRIPTION	HOURS	AMOUNT
	attaching same		
03/31/2023	SMS: Begin drafting email to Allegiant re edits to agreement for expert services; Email to Attorney Patrick Gilligan requesting review of travel expenses portion of Allegiant agreement	0.25	81.25
			Subtotal: 14,895.00
	===== Expenses		
03/21/2023	Owen & Associates: Transcripts of Williams and Greene depositions		800.00
03/24/2023	Apex Process Service: Depo of Williams and Greene		0.00
03/27/2023	Owen & Associates: Depo of Williams and Greene		270.00
			Subtotal: 1,070.00
	===== Services (Not Billed)		
03/08/2023	SMS: Attend deposition of Plaintiff Williams	2.30	0.00
03/08/2023	VC: Attend Plaintiff Greene's Deposition	1.80	0.00
			Subtotal: 0.00

Hours Summary:

- SMS- PGG (SMS): 17.50h @\$325.00 = \$5,687.50
- VC- PGG (VC): 16.85h @\$325.00 = \$5,476.25
- SC- PGG (SC): 27.40h @\$100.00 = \$2,740.00
- Patrick Gilligan (PGG): 3.05h @\$325.00 = \$991.25

BALANCE DUE

**\$15,965.00**

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