

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

RISK - CHUBB

Date: 1/7/2022

Invoice	Matter	Fees	Expenses	Amount
64319	Carlton Arms of Ocala, LLC (L003573574)	\$1,188.25	\$0.00	\$1,188.25
64320	Sona and Kuehn	\$8,440.25	\$0.00	\$8,440.25
<i>Total</i>		\$9,628.50	\$0.00	\$9,628.50

Gilligan, Anderson & Phelan, P.A.

1531 SE 36th Ave.
Ocala, FL 34471
+352 8677707

BILL TO
RISK - CHUBB

INVOICE # 64319
DATE 12/31/2021

MATTER

Carlton Arms of Ocala, LLC (...)

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/01/2021	RWB: A107 L160: Settlement/Non-Binding ADR - Review and reply to email from Attorney Rob Kelley re offer of settlement	0.20	49.00
12/01/2021	RWB: A105 L160: Communicate (with legal team) - Telephone conference with Attorney Susan Schoettle re proposed settlement and strategy; Draft email to Susan and Attorneys Pat Gilligan and Gwen Williams	0.80	196.00
12/08/2021	PGG: A105 L210: Pleadings; Review amended complaint; Instructions to Paralegal and Attorney Sydney Simmons about same; Office conference with Paralegal about location of newly identified mobile home park	0.80	196.00
12/12/2021	PGG: A105 L100: Case Assessment, Development and Administration; Read email from Attorney Schoettle about upcoming Shade meeting with Council; Draft email to Attorney Rob Batsel about same	0.15	36.75
12/13/2021	RWB: A106 L160: Settlement/Non-Binding ADR Telephone conference with Fazillete Gonzalez re shade meeting	0.20	49.00
12/13/2021	RWB: A105 L160: Settlement/Non-Binding ADR Telephone conference with Attorney Schoettle re shade meeting	0.20	49.00
12/14/2021	RWB: A101 L160: Settlement/Non-Binding ADR - Review file in preparation for shade meeting	0.60	147.00
12/14/2021	RWB: A105 L160: Communicate (with legal team) Telephone conference with Attorney Susan Schoettle re shade meeting	0.40	98.00
12/14/2021	RWB: A103 L160: Settlement/Non-Binding ADR Draft outline for shade meeting and considerations re settlement offer	0.40	98.00
12/14/2021	RWB: A109 L160: Appear for/attend shade meeting with city council and Attorney Susan Schoettle	0.50	122.50
12/22/2021	RWB: A107 L160: Settlement/Non-Binding ADR Draft email to Attorney Rob Kelley re denial of settlement proposal and status	0.20	49.00
12/27/2021	PGG: A104 L100: Case Assessment, Development and Administration; Review Chubb request for budget and initial report; Office conference with Attorney Sydney Simmons about same	0.30	73.50
12/27/2021	RWB: A107 L160: Settlement/Non-Binding ADR Review email from Attorney Rob Kelley re denial of proposal	0.10	24.50

Subtotal: 1,188.25

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

Hours Summary:	BALANCE DUE	\$1,188.25
- Rob Batsel (RWB): 3.60h @\$245.00 = \$882.00		
- Patrick Gilligan (PGG): 1.25h @\$245.00 = \$306.25		

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BILL TO
RISK - CHUBB

INVOICE # 64320
DATE 12/31/2021

MATTER
Sona and Kuehn

CLAIM #
L003137937

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
12/01/2021	GPW: A103 L200: Pre-Trial Pleadings and Motions; Telephone conference with Attorney Patrick Gilligan re Answer to Fourth Amended Complaint and filing same; Review and save Order re Amending Fourth Amended Complaint; Review Fifth Amended Complaint; Edit Answer re same and email draft to Attorney Patrick Gilligan; Email and office conference with City Paralegal Shannon Crandall re changing caption and re errors in Fifth Amended Complaint	0.40	98.00
12/01/2021	GPW: A103 L240: Dispositive Motions; Continue research and drafting Motion for Summary Judgment	4.70	1,151.50
12/02/2021	GPW: A103 L240: Dispositive Motions; Continue research and drafting Motion for summary judgment; Office conference with Attorney Patrick Gilligan re same and re Answers to Amended Complaints	3.10	759.50
12/02/2021	PGG: A105 L240: Dispositive Motions; Office conference with Attorney Gwendolyn P. Williams about answer to Fifth Amended Complaint and filing of Motion for Summary Judgment	0.35	85.75
12/02/2021	GPW: A104 L200: Pre-Trial Pleadings and Motions; Office conference with City Paralegal Shannon Crandall re finalizing Answer to Fifth Amended Complaint and footnotes and caption needed re same; Office conference with Attorney Chris Anderson and Attorney Patrick Gilligan re same; Instructions to City Paralegal Shannon Crandall re same	0.30	73.50
12/03/2021	GPW: A107 L190: Other Case Assessment, Development and Administration; Email opposing counsel re attendees at mediation	0.10	24.50
12/03/2021	GPW: A103 L240: Dispositive Motions; Continue drafting Motion for Summary Judgment; Office conference with Attorney Patrick Gilligan re facts section and research needed; Office conferences with Attorney Sydney Simmons re same	3.10	759.50
12/03/2021	SMS: A102 L240: Dispositive Motions; Discussions with Attorney Gwendolyn Williams re Motion for Summary Judgment and follow up research on same	0.60	147.00
12/06/2021	PGG: A105 L160: Settlement/Non-Binding ADR; Office conference with Attorney Gwendolyn P. Williams about mediation conference; Instructions to Paralegal about mediation statement and pre-mediation conference	0.60	147.00

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DATE	DESCRIPTION	HOURS	AMOUNT
12/06/2021	GPW: A105 L160: Settlement/Non-Binding ADR; Office conference with Attorney Patrick Gilligan re attending mediation and strategy re same; Office conference with City Paralegal Shannon Crandall re same; Telephone conference with Carolyn Goodwine and Ken Clements re same; Email City Paralegal Shannon Crandall re drafting mediation statement; Review and edit mediation statement and send to City Paralegal Shannon Crandall for finalization and sending	0.90	220.50
12/06/2021	SMS: A102 L240: Dispositive Motions; Research on qualified immunity; Discussions with Attorney Gwendolyn Williams re same; Begin editing Motion for Summary Judgment; Finish initial edits and redline of Motion; Send to Attorney Gwendolyn Williams with notes on finishing the same; Follow up discussions with Attorney Gwendolyn Williams re same	2.20	539.00
12/06/2021	GPW: A103 L240: Dispositive Motions; Office conferences with Attorney Sydney Simmons re additional research needed and adding same to draft of Motion for Summary Judgment; Review Attorney Sydney Simmons' redline of Memorandum of Law in same and accept changes; Continue drafting Motion for Summary Judgment	4.10	1,004.50
12/07/2021	GPW: A103 L240: Dispositive Motions; Continue drafting Motion for Summary Judgment	1	245.00
12/07/2021	GPW: A109 L160: Settlement/Non-Binding ADR; Office conference with Attorney Patrick Gilligan re preparation for mediation; Prepare for and attend mediation	5.50	1,347.50
12/07/2021	PGG: A105 L160: Settlement/Non-Binding ADR; Review mediation statement; Office conference with Attorney Gwendolyn P. Williams about upcoming mediation; Office conference with Chief Mike Balken and Ken Clements about mediation settlement; review mediation Settlement Agreement; Instructions to Paralegal about sending to Risk/PMA	1.50	367.50
12/07/2021	SMS: A103 L240: Dispositive Motions; Continue research for Motion for Summary Judgment and editing and revising the same; Discussions with Attorney Gwendolyn Williams re same; Follow up brief with Attorney Patrick Gilligan and Attorney Gwendolyn Williams re outcome of mediation	2.40	588.00
12/07/2021	RWB: A105 L160: Settlement/Non-Binding ADR - Office conference with Ken Clements and Attorney Patrick Gilligan re structure of settlement agreement	0.30	73.50
12/08/2021	GPW: A105 L160: Settlement/Non-Binding ADR; Office conferences with City Paralegal Shannon Crandall re emailing OPD officers re outcome of mediation; Draft email and send same to OPD officer with Mediation Settlement Agreement	0.50	122.50
12/08/2021	GPW: A103 L160: Settlement/Non-Binding ADR; Begin drafting Release; Office conference with City Paralegal Shannon Crandall re same and re drafting dismissal documents to send to opposing counsel; Review draft releases and dismissals and email same to Attorney Patrick Gilligan	1.90	465.50
12/08/2021	PGG: A105 L160: Settlement/Non-Binding ADR; Review settlement documents for form and legality	0.10	24.50
12/13/2021	GPW: A105 L160: Settlement/Non-Binding ADR; Email City Paralegal Shannon Crandall re finalizing releases; Telephone conference with Ken Clements re settlement agreement and dismissal; Office conference with City Paralegal Shannon Crandall	0.50	122.50

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DATE	DESCRIPTION	HOURS	AMOUNT
	re sending settlement agreement to Ken Clements and sending finalized releases to opposing counsel; Follow up email to Ken Clements re entities receiving donations listed in settlement agreement		
12/16/2021	PGG: A107 L160: Settlement/Non-Binding ADR; Read and respond to email from Attorney Katz about style of release; Instructions to Paralegal about revising style on settlement stipulation	0.20	49.00
12/23/2021	PGG: A107 L140: Document/File Management; Update case diary for receipt of stipulation for dismissal	0.10	24.50
			Subtotal: 8,440.25

Hours Summary:

- GPW- PGG (GPW): 19.60h @\$245.00 = \$4,802.00
- Gwen Pasteur Williams (GPW): 6.50h @\$245.00 = \$1,592.50
- SMS- PGG (SMS): 5.20h @\$245.00 = \$1,274.00
- Patrick Gilligan (PGG): 2.85h @\$245.00 = \$698.25
- Rob Batsel (RWB): 0.30h @\$245.00 = \$73.50

BALANCE DUE

\$8,440.25

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