

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: 3/6/2023

Invoice	Matter	Fees	Expenses	Amount
65705	American Humanist Assn	\$182.50	\$0.00	\$182.50
65706	Brown, William Samuel (L003358033)	\$4,377.50	\$0.00	\$4,377.50
65707	Day, James and Joann	\$30.00	\$0.00	\$30.00
65708	Forsyth-JJ	\$48.75	\$0.00	\$48.75
65709	Goff, James	\$310.00	\$0.00	\$310.00
65710	Harris, Emily and Aron (L003591568)	\$4,003.75	\$0.00	\$4,003.75
65711	Hernandez, Pedro	\$75.00	\$0.00	\$75.00
65712	Melkonian	\$608.75	\$0.00	\$608.75
65713	Secki	\$6,270.00	\$0.00	\$6,270.00
65714	Williams and Greene (L003434864)	\$785.00	\$0.00	\$785.00
<i>Total</i>		\$16,691.25	\$0.00	\$16,691.25

Gilligan, Anderson & Phelan, P.A.

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

BILL TO

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Mgmt.
Attn: Senior Account Claims
Representative
2701 North Rocky Pointe Drive
Suite 250
Tampa, FL 33607

INVOICE # 65705

DATE 02/28/2023

MATTER

American Humanist Assn

CLAIM #

L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/12/2023	PGG: Read and respond to email from Attorney Southerland about status of Supreme Court review	0.20	65.00
02/16/2023	SC: Review email from Attorney Southerland regarding case status; Prepare and send update email to Risk; Update case diary	0.20	20.00
02/16/2023	PGG: Read email from Attorney Southerland about status of Supreme Court review	0.10	32.50
02/21/2023	PGG: Read email from Attorney Southerland about Supreme Court review status	0.10	32.50
02/27/2023	PGG: Read email from Attorney Southerland about pending Supreme Court Petition for Certiorari	0.10	32.50

Subtotal: 182.50

Hours Summary:

- Patrick Gilligan (PGG): 0.50h @\$325.00 = \$162.50

- SC- PGG (SC): 0.20h @\$100.00 = \$20.00

BALANCE DUE

\$182.50

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INVOICE # 65706

DATE 02/28/2023

MATTER

Brown, William Samuel (L0033...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/03/2023	SMS: Email instructions to Paralegal Shannon Crandall to follow up with Judicial Assistant on setting hearings and instructions to draft expert disclosures	0.20	65.00
02/03/2023	SC: Review email from Attorney Sydney Simmons; Prepare and send follow up email to JA regarding motion to extend hearing deadline; Update case diary	0.20	20.00
02/07/2023	SC: Office conference with Attorney Sydney Simmons and Attorney Patrick Gilligan regarding regarding depositions of ORMC doctors and pending motion for summary judgment; Call to ORMC Risk Management to attempt to get availability of physicians; Prepare and send follow up email to Brian Rapp at ORMC	0.50	50.00
02/08/2023	PGG: Draft email to Paralegal about status of motion for extension to hear Motion for Summary Judgment	0.10	32.50
02/09/2023	SMS: Review emails from Opposing Counsel's office and Paralegal Shannon Crandall; Follow up discussion with Paralegal Shannon Crandall re same	0.20	65.00
02/09/2023	SMS: Review email correspondence from Opposing Counsel and Attorney Patrick Gilligan re status of Motion to Extend Deadline for Hearing on Motion for Summary Judgment; Draft Proposed Order; Send to Attorney Patrick Gilligan for review	0.40	130.00
02/09/2023	PGG: Review and revise Order to Extend deadlines for hearing dispositive motions	0.15	48.75
02/11/2023	PGG: Review Plaintiff's Expert Witness disclosure; Instructions to Paralegal about comparing with our witness list and updating Casemap; Instructions to Attorney Sydney Simmons about investigating their expert	0.60	195.00
02/13/2023	SMS: Office conferences with Paralegal Shannon Crandall re doctors as experts for deposition and determining best doctor with knowledge of case; Email correspondence with Paralegal Shannon Crandall re same	0.20	65.00

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DATE	DESCRIPTION	HOURS	AMOUNT
02/13/2023	SC: Prepare notice of taking video depositions of doctors	0.50	50.00
02/13/2023	SC: Online search regarding current location of Dr. Titelbaum; Review ORMC records for additional attending physicians; Office conference with Attorney Sydney Simmons regarding same	1	100.00
02/13/2023	SC: Prepare subpoena for depositions of Dr. Baxter and Dr. Bohsali; Prepare and send email to Attorney Sydney Simmons attaching same for review	0.60	60.00
02/14/2023	PGG: Proof Subpoenas to medical providers; Instructions to Paralegal to prepare expert Interrogatories; Office conference with Paralegal about setting depositions by Zoom	0.25	81.25
02/14/2023	SMS: Review email and drafts from Paralegal Shannon Crandall re Notices for depositions of experts and doctors; Follow up discussion with Paralegal Shannon Crandall re editing same	0.15	48.75
02/16/2023	SC: Review and respond to email from Attorney Patrick Gilligan regarding expert discovery; Prepare expert interrogatories, notice of serving expert interrogatories and expert request for production; Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.50	50.00
02/16/2023	SC: Review email from Attorney Bloom approving proposed order extending deadline for summary judgment hearing; Prepare and send email to judicial assistant attaching same with filed motion; Update case diary	0.30	30.00
02/16/2023	PGG: Review and Proof expert discovery; Instructions to Paralegal	0.35	113.75
02/16/2023	SC: Review email instruction from Attorney Patrick Gilligan; Revise expert request to produce, interrogatories and notice of serving; File same with Clerk and serve on opposing counsel; Update case diary and calendar response deadline	0.50	50.00
02/17/2023	PGG: Update case diary for entry of order extending deadline for Motion for Summary Judgment hearing and for return of expert Interrogatories	0.10	32.50
02/17/2023	SC: Review order granting extension of summary judgment deadline; Update case diary; Prepare and send email to client attaching same	0.30	30.00
02/17/2023	SMS: Begin review of Plaintiff's expert disclosure; Review documents and casemap relevant information as addressed in expert disclosure; Email to Paralegal Shannon Crandall re receipt of records from Medical examiner's office	0.75	243.75
02/20/2023	SC: Online research regarding court reporters in Daytona Beach; Schedule deposition of Dr. Baxter with Esquire Depo Solutions in Daytona Beach; Revise deposition notice for Dr. Baxter and Dr. Bohsali; Revise subpoenas for depositions for Dr. Baxter and Dr. Bohsali; Prepare and send email to Attorney Patrick Gilligan attaching all for review and approval	1	100.00
02/20/2023	SC: Review email instruction from Attorney Patrick Gilligan; Update task and calendar with extension deadline for summary judgment hearing	0.20	20.00
02/20/2023	SC: Review plaintiff's witness and exhibit list; Prepare and send email to Attorney Patrick Gilligan regarding previous interrogatory responses regarding expert witness	0.20	20.00
02/20/2023	SMS: Continue review of Plaintiff's expert list and casemap documents in coordination with same; Email to Paralegal Shannon Crandall with instructions to follow up on records not yet received	2.40	780.00
02/20/2023	SC: Review email from Attorney Sydney Simmons regarding	0.20	20.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	deposition of Dr. Rockower; Prepare and send email to Mr. Rapp at ORMC requesting employment status for service of subpoena		
02/20/2023	SC: Review email from Attorney Sydney Simmons regarding pending records; Review file and related documents; Prepare and send response to Attorney Sydney Simmons regarding same	0.30	30.00
02/20/2023	SC: Review email instruction from Attorney Patrick Gilligan; Revise notices of taking depo and subpoenas; File and serve notices of taking deposition with Clerk; Update case diary	0.50	50.00
02/21/2023	PGG: Read email from Attorney Sydney Simmons and Paralegal about status of medical records discovery	0.10	32.50
02/21/2023	PGG: Review and execute deposition subpoenas to medical providers; Instructions to Paralegal about send relevant records to provider prior to deposition	0.15	48.75
02/21/2023	PGG: Office conference with Attorney Sydney Simmons about witness and exhibit list filed by Plaintiff and preparing Request to Produce for exhibits; Office conference with Attorney Sydney Simmons about discovery and deposition of medical witnesses and experts and setting up conference with Risk to discuss strategy heading into trial; Instructions to Paralegal about trial notebook; begin preparing direct examination of Plaintiff	0.60	195.00
02/21/2023	SMS: Office conference with Attorney Patrick Gilligan about witness and exhibit list filed by Plaintiff and preparing Request to Produce for exhibits; Office conference with Attorney Patrick Gilligan about discovery and deposition of medical witnesses and experts and setting up conference with Risk to discuss strategy heading into trial	0.35	113.75
02/21/2023	SMS: Review emails from Opposing Counsel re wrong date on notices of deposition; Instruct Paralegal Shannon Crandall to edit notices	0.15	48.75
02/21/2023	SC: Phone call with Esquire Depo solutions to confirm videographer for deposition on 3/9/23; Phone call to process server to serve subpoenas on doctors for depositions; Email exchange with Owen & Associates regarding Ocala depositions and videographer for same; Update case diary; Prepare and send email to client attaching same	0.50	50.00
02/21/2023	SMS: Email to Paralegal Shannon Crandall re next tasks and instructions to draft Request to Produce	0.15	48.75
02/22/2023	SC: Meeting with Richard Dennis and Attorney Sydney Simmons regarding expert witness testimony and discovery	0.10	10.00
02/22/2023	SC: Review response from Radiology Associates to our witness subpoena from Dr. Bohsali; Prepare and send email to Attorney Patrick Gilligan and Attorney Sydney Simmons regarding same	0.20	20.00
02/22/2023	SC: Email exchange with Felicia Grasty at MCFR regarding response to records subpoena; Review records; Prepare and send email to Attorney Sydney Simmons regarding same	0.40	40.00
02/23/2023	PGG: Office conference with Paralegal and Attorney Sydney Simmons about experts needed for deposition and use at trial	0.35	113.75
02/23/2023	SMS: Office conference with Paralegal Shannon Crandall and Attorney Patrick Gilligan about experts needed for deposition and use at trial; Follow up discussion with Paralegal Shannon Crandall re instructions to edit subpoenas for correct doctor and to send subpoena to Hospice doctor certifying Decedent's cause of death on death certificate	0.50	162.50
02/23/2023	PGG: Office conference with Attorney Sydney Simmons and Paralegal about expert medical personnel to depose	0.15	48.75

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DATE	DESCRIPTION	HOURS	AMOUNT
02/23/2023	PGG: Telephone conference with Attorney Batteese about canceling Radiologist deposition	0.25	81.25
02/23/2023	SC: Office conference with Attorney Sydney Simmons and Attorney Patrick Gilligan regarding case status and witnesses for depositions;	0.10	10.00
02/23/2023	SC: Review medical records from ORMC as to Dr. Baxter and research Dr. Baxter's licensing information to include practice area; Review Hospice records and death certificate as to certifying physician; Research Dr. Velez licensing information online; Office conference with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding cancellation of depo of Dr. Bohsali and replacing with depo of Dr. Velez	1	100.00
02/23/2023	SC: Prepare and send email to opposing counsel regarding change in witnesses for deposition; Review email instruction from Attorney Patrick Gilligan regarding cancellation notice for Dr. Bohsali; Prepare notice of cancellation for depo of Dr.Bohsali; Prepare subpoena for depo of Dr. Velez; Prepare notice of taking depo of Dr. Velez; Prepare and send email to Attorney Patrick Gilligan attaching all for review and approval	1	100.00
02/23/2023	SMS: Review and respond to email from Paralegal Shannon Crandall re notices of deposition; Review and approve Notices cancelling deposition and setting deposition of Hospice doctor	0.15	48.75
02/24/2023	SC: Revise notice cancel depo, notice taking depo and subpoena for depo of Dr. Velez; File and serve notice of cancelation and notice of taking deposition; Prepare and send email to process server to serve subpoena; Update case diary	0.50	50.00
02/24/2023	SC: Email exchange with Attorney Sydney Simmons and Attorney Patrick Gilligan regarding cancelation of Dr. Bohsali depo and call to Attorney Masters; Review FL Bar directory for contact information; Review email instructions from Attorney Sydney Simmons and Attorney Patrick Gilligan; Prepare third request to produce; Prepare and send email to Attorney Sydney Simmons submitting same for review; Begin preparing witness and exhibit list	1	100.00
02/27/2023	SMS: Review Paralegal Shannon Crandall's draft Witness and Exhibit List; Email questions concerning same and edits to same; Office conference with Attorney Patrick Gilligan re amending witness list to include experts; Amend Witness List accordingly and review documents to support same; Send to Paralegal Kristin Peterson to finalize and file	0.85	276.25
02/27/2023	PGG: Review witness and exhibit list; Office conference with Attorney Sydney Simmons about same	0.30	97.50

Subtotal: 4,377.50

Hours Summary:

- SMS- PGG (SMS): 6.45h @\$325.00 = \$2,096.25
- Patrick Gilligan (PGG): 3.45h @\$325.00 = \$1,121.25
- SC- PGG (SC): 10.60h @\$100.00 = \$1,060.00
- Shannon Crandall (SC): 1.00h @\$100.00 = \$100.00

BALANCE DUE

\$4,377.50

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Mgmt.
Attn: Senior Account Claims
Representative
2701 North Rocky Pointe Drive
Suite 250
Tampa, FL 33607

INVOICE # 65707

DATE 02/28/2023

MATTER

Day, James and Joann

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/22/2023	SC: Office conference with Attorney Sydney Simmons and Richard Dennis regarding case status	0.10	10.00
02/23/2023	SC: Review email from Jackie at PMA; Prepare and send response email attaching demand letter	0.20	20.00

Subtotal: 30.00

Hours Summary:

- SC- PGG (SC): 0.30h @\$100.00 = \$30.00

BALANCE DUE

\$30.00

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Tampa, FL 33607

INVOICE # 65708

DATE 02/28/2023

MATTER

Forsyth-JJ

CLAIM #

L001430074

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/21/2023	PGG: Review Fact Information Sheet from Defendant; Read email from Paralegal about Review; Draft forwarding letter to Risk about not pursuing and closing file	0.15	48.75

Subtotal: 48.75

Hours Summary:

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

BALANCE DUE

\$48.75

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Tampa, FL 33607

INVOICE # 65709

DATE 02/28/2023

MATTER

Goff, James

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/01/2023	SC: Prepare and send public records request to Marion County regarding sidewalk repairs around courthouse	0.10	10.00
02/01/2023	SC: Review and respond to email from Attorney Sydney Simmons regarding repairs at courthouse sidewalk and public records request to county	0.10	10.00
02/01/2023	SMS: Email to Richard Dennis re contacting County to request information about fixed sidewalks; Email correspondence with Alan McMurray with Precision Sidewalk re requesting information from employees about "County Office Driveway" definition; Email correspondence with Paralegal Shannon Crandall re instructions to submit Public Records Request to County about fixing sidewalk	0.45	146.25
02/02/2023	SMS: Review email from Richard Dennis re contact at County to discuss sidewalk repairs; Telephone conference with Thomas Futch at Marion County; Follow up email to Thomas Futch discussing request for records of sidewalk repairs on NW 2nd Street	0.35	113.75
02/20/2023	SC: Review email response from Mr. Blevins at Marion County attorney's office regarding public records request; Review City information from previous request for work orders related to sidewalk repairs near courthouse; Prepare and send response email to Mr. Blevins regarding same	0.30	30.00

Subtotal: 310.00

Hours Summary:

- SMS- PGG (SMS): 0.80h @\$325.00 = \$260.00
- SC- PGG (SC): 0.50h @\$100.00 = \$50.00

BALANCE DUE

\$310.00

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Representative
2701 North Rocky Pointe Drive
Suite 250
Tampa, FL 33607

INVOICE # 65710

DATE 02/28/2023

MATTER

Harris, Emily and Aron (L003...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/01/2023	VC: Reviewed responsive email from Ocala Spine and Injury regarding subpoena for records; Updated file accordingly and Emailed Attorney Patrick Gilligan and Paralegal Shannon Crandall regarding same	0.20	65.00
02/01/2023	VC: Began review of Ocala Spine and Injury records to include making relevant and important notes for same	1.20	390.00
02/02/2023	PGG: Read and respond to email from Attorney Victoria Cortez about medical record review; Draft email to Attorney Victoria Cortez about preparing Interrogatory to Plaintiff concerning prior accidents	0.40	130.00
02/02/2023	VC: Casemapped records from Ocala Spine and injury and input notes and witnesses; Emailed Attorney Patrick Gilligan regarding findings from same; Read and responded to email from Attorney Patrick Gilligan regarding plaintiff's prior injuries, accidents, and treatments and subpoenaing records for same	1.80	585.00
02/02/2023	VC: Read and responded to Attorney Patrick Gilligan's email regarding potential additional interrogatories to Plaintiff; Reviewed the Florida Rules of Civil Procedure Standard Interrogatories Forms to determine whether additional interrogatories in this case are necessary	0.30	97.50
02/03/2023	VC: Read email from Paralegal Shannon Crandall regarding medical records received; Updated discovery index accordingly	0.20	65.00
02/03/2023	VC: Began review of medical records received from Sabal Primary Care; Extracted relevant documents from CaseMap and made notes for same	2.30	747.50
02/06/2023	VC: Completed review of medical records received from Sabal Primary Care to include all visits from 2020 to 2023 and incorporated records from Advanced Imaging and Radiology Associates; Extracted all relevant record entries and casemapped same	2.80	910.00
02/07/2023	VC: Reviewed and edited Notice of Production to Non Parties;	0.20	65.00

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DATE	DESCRIPTION	HOURS	AMOUNT
02/07/2023	Emailed Paralegal Shannon Crandall regarding same		
02/07/2023	VC: Reviewed waiver and request for copies filed by Plaintiff's counsel regarding Notice of Production to Non Parties	0.10	32.50
02/07/2023	SC: Review email from Attorney Victoria Cortez regarding additional providers; Review current records to confirm same; Prepare non-party production notice, subpoenas, HIPAA compliance form and records custodian affidavit; Redact required information; Prepare and send email from Attorney Victoria Cortez approving same	1	100.00
02/07/2023	SC: Review email approval from Attorney Victoria Cortez; Prepare notice of non-party production, subpoenas for records, records affidavit and HIPAA compliance for filing; File same with Clerk and update case diary	0.50	50.00
02/07/2023	SC: Review waiver and notice of no objection from attorney for plaintiffs; Prepare and send out for service subpoenas, HIPAA compliance and record's custodian affidavit; Update case diary	0.50	50.00
02/07/2023	VC: Reviewed, extracted relevant documents, and casemapped medical records received from Diagnostic imaging for Plaintiff Harris	0.90	292.50
02/07/2023	VC: Began review of medical records received from Dr. Byrd for Plaintiff	0.30	97.50
02/13/2023	PGG: Update calendar for amended trial dates	0.10	32.50
02/14/2023	VC: Sent email to Paralegal Shannon Crandall regarding outstanding discovery requests to Non-Parties	0.10	32.50
02/15/2023	SC: Review medical records from Advanced Imaging; Upload same into CaseMap; Prepare and send email to Attorney Victoria Cortez regarding same	0.50	50.00
02/16/2023	PGG: Read and respond to email from Plaintiff's Paralegal about scheduling mediation; Instructions to Paralegal	0.15	48.75
02/16/2023	SC: Review and respond to email from Attorney Carlson's office regarding mediation; Create calendar invite for same; Update case diary	0.30	30.00
02/17/2023	PGG: Read email from Attorney Harter about mediation scheduling; Instructions to Paralegal and Attorney Victoria Cortez about same	0.10	32.50
02/17/2023	SC: Review medical records from Ocala Family Medical Center and Radiology Associates; Research referring doctor's on radiology billing records; Upload records into CaseMap and completed file; Update case diary; Prepare and send email to Attorney Victoria Cortez regarding same	1	100.00

Subtotal: 4,003.75

Hours Summary:

- VC- PGG (VC): 7.90h @\$325.00 = \$2,567.50
- Victoria Cortez (VC): 2.50h @\$325.00 = \$812.50
- SC- PGG (SC): 3.80h @\$100.00 = \$380.00
- Patrick Gilligan (PGG): 0.75h @\$325.00 = \$243.75

BALANCE DUE

\$4,003.75

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BILL TO

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Tampa, FL 33607

INVOICE # 65711

DATE 02/28/2023

MATTER

Hernandez, Pedro

CLAIM #

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/06/2023	SC: Review and respond to email from Jackie with PMA regarding status of summary judgment hearing	0.10	10.00
02/06/2023	GPW: Email correspondence with Paralegal Shannon Crandall re emailing risk re outcome of hearing on Motion for Summary Judgment, forwarding documents filed by opposing counsel and status update re case and proposed order	0.20	65.00

Subtotal: 75.00

Hours Summary:

- Gwen Pasteur Williams (GPW): 0.20h @\$325.00 = \$65.00
- SC- GPW (SC): 0.10h @\$100.00 = \$10.00

BALANCE DUE

\$75.00

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INVOICE # 65712

DATE 02/28/2023

MATTER

Melkonian

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/17/2023	SC: Office conference with Attorney Sydney Simmons regarding discovery request subsequent to deposition of Plaintiff; Review email instruction from Attorney Simmons; Prepare 2nd request to produce to plaintiff; Prepare and send email to Attorney Sydney Simmons attaching same	0.60	60.00
02/17/2023	SMS: Email to Paralegal Shannon Crandall re status of Request to Produce following Plaintiff's deposition; Review Request to Produce and edit same; Send to Paralegal Shannon Crandall with instructions to file	0.25	81.25
02/17/2023	SC: Review email instruction from Attorney Sydney Simmons; Prepare request to produce for filing with Clerk and serving; File and serve same; Calculate response deadline and update case diary	0.50	50.00
02/17/2023	SMS: Review email from Paralegal Shannon Crandall re drafting litigation budget; Office conference with Paralegal Shannon Crandall re same and instruct Paralegal Shannon Crandall to draft litigation budget	0.25	81.25
02/17/2023	SC: Office conference with Attorney Sydney Simmons regarding litigation budget; Review time and billing records; Prepare litigation budget through today; Prepare and send email to Attorney Sydney Simmons attaching same	0.60	60.00
02/20/2023	SMS: Review and respond to email from Paralegal Shannon Crandall enclosing draft Litigation Budget; Revise Litigation Budget and send to Attorney Patrick Gilligan for approval; Office conference with Attorney Patrick Gilligan re edits to same; Instructions to Paralegal Shannon Crandall to prepare bills to date and follow up discussion with Paralegal Shannon Crandall re same	0.45	146.25
02/20/2023	PGG: Review and revise case budget; Office conference with Attorney Sydney Simmons about same	0.40	130.00

Subtotal: 608.75

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Hours Summary:

- SMS- PGG (SMS): 0.95h @\$325.00 = \$308.75
- SC- PGG (SC): 1.70h @\$100.00 = \$170.00
- Patrick Gilligan (PGG): 0.40h @\$325.00 = \$130.00

BALANCE DUE

\$608.75

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INVOICE # 65713

DATE 02/28/2023

MATTER

Secki

CLAIM #

L003387896

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/01/2023	SC: Prepare notice of non-party production with subpoenas, exhibits, records affidavit and HIPAA compliance; Prepare and send email to Attorney Victoria Cortez attaching same for review and approval	1	100.00
02/02/2023	VC: Reviewed and revised Notice of Production to Non-Parties; Emailed Paralegal Shannon Crandall regarding same; Office conference with Paralegal Shannon Crandall regarding locating missing information needed for NPNPs; Located information needed for NPNPs; Emailed Paralegal Shannon Crandall regarding same	0.50	162.50
02/02/2023	VC: Continued review and CaseMap of Ocala Spine and Injury records received for Plaintiff Secki, to include: DUD reports, Account Ledgers, Surgery Consult Records, and DO chart notes, as well as, updating witnesses and notes of medical history	1.70	552.50
02/03/2023	VC: Reviewed, casemapped, and made notes regarding medical records received for Plaintiff Secki from Ocala Spine and Injury which included: DC chart notes, DO chart notes, Pain scores, Physical Therapy chart notes, Records from CareFirst Imaging, and records from Dr. Jollu; Emailed Paralegal Shannon Crandall regarding subpoenaing records from doctors and facilities not previously disclosed	3.90	1,267.50
02/03/2023	VC: Reviewed and approved Notice of Production of Non Parties to be filed for providers not previously disclosed by Plaintiff	0.20	65.00
02/03/2023	SC: Review email instruction from Attorney Victoria Cortez; Add additional providers to non-party notice; Prepare subpoenas, exhibits, records affidavit and HIPAA compliance; Redact social, date of birth and driver's license number; prepare and send email to Attorney Victoria Cortez attaching same	1	100.00
02/03/2023	SC: Review email approval from Attorney Victoria Cortez; Prepare non-party production package for filing; File and serve same; Update case diary	0.50	50.00
02/14/2023	VC: Sent email to Paralegal Shannon Crandall regarding drafting	0.20	65.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	additional interrogatories to Plaintiff regarding information learned from Deposition; Followed up with Paralegal Shannon Crandall regarding drafts of responses to Plaintiff's interrogatories and requests to produce;		
02/14/2023	SC: Review and respond to email from Ms. Warmuth regarding requested maintenance records; Review maintenance records received from Ms. Warmuth; Prepare and send email to Attorney Victoria Cortez regarding same	0.30	30.00
02/14/2023	SC: Phone call with Captain Eades regarding personnel and training records requested	0.10	10.00
02/14/2023	SC: Review email instruction from Attorney Victoria Cortez; Prepare City's second interrogatories and notice of serving same; Prepare and send email to Attorney Victoria Cortez attaching same for review and approval	0.60	60.00
02/14/2023	SC: Review email instruction from Attorney Victoria Cortez; Prepare and send email to Risk to coordinate discovery prep meeting; Review Risk file and OPD file along with interrogatories; Prepare proposed answers to interrogatories; Prepare and send email to Attorney Victoria Cortez attaching same for revision	1.50	150.00
02/14/2023	SC: Review all documents received from City in file; Prepare and send email to Sgt. Zadnik at OPD requesting Ofc. Hajalou's personnel file; Prepare and send email to Ms. Warmuth in Fleet requesting vehicle maintenance records; Prepare response to request to produce along with responsive documents folders; Prepare and send email to Attorney Victoria Cortez attaching response with link to responsive documents for review and revision	1.50	150.00
02/15/2023	VC: Reviewed and revised Defendant's Second Interrogatories to Plaintiff and Notice regarding same in preparation of filing; Emailed Paralegal Shannon Crandall regarding filing same	0.20	65.00
02/15/2023	VC: Researched and revised Defendant's draft Answers to Plaintiff's Interrogatories; Emailed same to Attorney Patrick Gilligan for his review and revisions	2.20	715.00
02/15/2023	SC: Review personnel and training records received from OPD; Prepare and send email to Attorney Victoria Cortez regarding same	0.30	30.00
02/15/2023	SC: Review and respond to email from Jackie at PMA regarding discovery meeting; Update calendar invite	0.10	10.00
02/15/2023	VC: Office conference with Attorney Patrick Gilligan regarding review of Law Enforcement Personnel File for redaction of protected information pursuant to the Sunshine Law; Made revisions to Defendant's Answers to Plaintiff's Interrogatories based on same	0.30	97.50
02/15/2023	SC: Review email instruction from Attorney Victoria Cortez; Prepare interrogatories and notice of serving for filing and serving on opposing counsel; File notice of serving with clerk and serve interrogatories on opposing counsel; Update case diary	0.60	60.00
02/15/2023	SC: Review case diary; Update and prepare non-party subpoenas with exhibits, HIPAA notice and records affidavit for serving on non-parties; Prepare and send same for service; Update case diary	0.50	50.00
02/15/2023	PGG: Office conference with Attorney Victoria Cortez about responses to Plaintiff's discovery and Public Records Act objections; Review answers to Plaintiff's Interrogatories	0.40	130.00
02/20/2023	VC: Office conference with Attorney Patrick Gilligan regarding revisions to City's Answers to Interrogatories; Attempted to reach City Driver to discuss facts of case to update City's Interrogatory Answers; Researched exemptions of pursuant to Sunshine Law	1.60	520.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	applicable to case; Reviewed video evidence to properly update City's Answers to Interrogatories; Revised City's Answers to Interrogatories consistent with Office conference with Attorney Patrick Gilligan		
02/20/2023	SC: Review personnel file received from OPD and confirm personal information is properly redacted; Review training file from OPD and redact personal information; Office conference with Attorney Victoria Cortez regarding items in training file	1.50	150.00
02/20/2023	PGG: Office conference with Attorney Victoria Cortez about revisions to City's Answers to Interrogatories	0.50	162.50
02/21/2023	PGG: Office conference with Attorney Victoria Cortez about response to Request to Produce and Privilege Log	0.35	113.75
02/21/2023	VC: Office conference with Patrick Gilligan about response to Request to Produce and Privilege Log	0.35	113.75
02/21/2023	VC: Reviewed and revised Defendant's response to Plaintiff's First Request to Produce; Researched Florida Statute 119.071(1)(a) for exemptions to production; Reviewed all responsive documents to be produced; Drafted privilege log	2.30	747.50
02/21/2023	SC: Office conference with Attorney Victoria Cortez regarding testing records to be redacted; Review training file and redact additional documents as discussed; Review and respond to email from Attorney Victoria Cortez regarding same	1	100.00
02/22/2023	VC: Meeting with Risk's Richard Dennis to review and sign Defendant's Answers to Interrogatories and review Defendant's Response to Plaintiff's Request to Produce	0.50	162.50
02/22/2023	SC: Meeting with Richard Dennis and Attorney Victoria Cortez to review and finalize discovery responses; Revise answers to interrogatories	0.60	60.00
02/23/2023	SC: Review email from Leesburg urgent care regarding no medical records in response to our subpoena for records; Review and respond to email from Attorney Patrick Gilligan regarding same	0.20	20.00
02/23/2023	SC: Revise response to request to produce, privilege log and answers to interrogatories; Prepare notice of serving answers to interrogatories; Create responsive document file link; File privilege log, response to request to produce and notice of serving answers with clerk and serve on opposing counsel; Prepare and send service email to opposing counsel with responsive documents link and answers to interrogatories; Update case diary; Prepare and send email to client attaching copies of all	1	100.00
02/23/2023	SC: Review medical records from Dr. Steed; Prepare and send email to Attorney Victoria Cortez regarding findings and additional records to be requested	1	100.00

Subtotal: 6,270.00

Hours Summary:

- VC- PGG (VC): 9.85h @\$325.00 = \$3,201.25
- Victoria Cortez (VC): 4.10h @\$325.00 = \$1,332.50
- SC- PGG (SC): 13.30h @\$100.00 = \$1,330.00
- Patrick Gilligan (PGG): 1.25h @\$325.00 = \$406.25

BALANCE DUE

\$6,270.00

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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 # 65714

DATE 02/28/2023

MATTER

Williams and Greene (L003434...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/20/2023	SC: Review file and email from Jackie at PMA regarding case status; Respond to email from Jackie regarding same and attaching notice of taking deposition	0.20	20.00
02/23/2023	VC: Office conference with Attorney Patrick Gilligan and Attorney Sydney Simmons regarding possible Compulsory Medical Examination and discussion with Risk	0.15	48.75
02/23/2023	PGG: Office conference with Attorney Victoria Cortez and Attorney Sydney Simmons about possible Compulsory Medical Examination and discussion with Risk	0.15	48.75
02/23/2023	SMS: Office conference with Attorney Victoria Cortez and Attorney Patrick Gilligan about possible Compulsory Medical Examination and discussion with Risk; Follow up telephone conference with Attorney Victoria Cortez and Richard Dennis; Email questions and summary of discussion to Attorney Patrick Gilligan	0.35	113.75
02/23/2023	VC: Telephone conference with Richard Dennis regarding IME	0.20	65.00
02/23/2023	PGG: Read and respond to email from Attorney Sydney Simmons about mediation and accident reconstructionist	0.15	48.75
02/24/2023	SMS: Review case file for status of case and to recommend IME or accident reconstructionist to Client; Draft email to Richard Dennis with case summary and recommendations to move forward; Send email to Paralegal Shannon Crandall to get total medical bills	0.45	146.25
02/24/2023	SC: Review email from Attorney Sydney Simmons with case/damages summary; Review Risk file and determine current medicals for Williams and Greene; Prepare and send response email to Attorney Sydney Simmons with additional information to include in summary	0.50	50.00
02/27/2023	SMS: Finalize email to Richard Dennis re case status and send; Review email re Richard Dennis being out of office; Follow up discussion with Attorney Patrick Gilligan re potential edits to email and sending to Ashley Brown and copying City Attorney; Forward	0.40	130.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	case status email to Ashley Brown and City Attorney		
02/27/2023	PGG: Office conference with Attorney Sydney Simmons about case analysis report to Risk	0.35	113.75

Subtotal: 785.00

Hours Summary:	BALANCE DUE	\$785.00
- SMS- PGG (SMS): 1.20h @\$325.00 = \$390.00		
- Patrick Gilligan (PGG): 0.65h @\$325.00 = \$211.25		
- VC- PGG (VC): 0.35h @\$325.00 = \$113.75		
- SC- PGG (SC): 0.70h @\$100.00 = \$70.00		

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