

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: 2/4/2022

Invoice	Matter	Fees	Expenses	Amount
64438	Shadow Oaks	\$1,923.25	\$0.00	\$1,923.25
64439	Marin, William & Janelle	\$3,969.00	\$135.00	\$4,104.00
64440	Goff, James	\$367.50	\$29.00	\$396.50
64441	Clifton, Talia	\$367.50	\$0.00	\$367.50
64442	American Humanist Assn	\$85.75	\$0.00	\$85.75
64443	Forsyth-JJ	\$343.00	\$0.00	\$343.00
64444	Hernandez, Pedro	\$220.50	\$0.00	\$220.50
64445	L003358033- Brown, William Samuel (L003358033)	\$147.00	\$0.00	\$147.00
<i>Total</i>		\$7,423.50	\$164.00	\$7,587.50

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BILL TO

PMA Management Corp/Risk
Mgmt.
Attn: Senior Account Claims
Representative
2701 North Rocky Pointe Drive
Suite 250
Tampa, FL 33607

INVOICE # 64442**DATE 01/31/2022****MATTER**

American Humanist Assn

CLAIM #

L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/18/2022	PGG: : Instructions to Paralegal to calendar oral argument and see if audio link available	0.10	24.50
01/19/2022	PGG: A108 L100: Telephone conference with Ken Clements about case status	0.15	36.75
01/31/2022	PGG: : Review Appellate Court Scheduling Order	0.10	24.50
			Subtotal: 85.75

Hours Summary:

- Patrick Gilligan (PGG): 0.35h @\$245.00 = \$85.75

BALANCE DUE**\$85.75**

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INVOICE # 64441**DATE 01/31/2022****MATTER**

Clifton, Talia

CLAIM #

L002678511

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/03/2022	PGG: : Review response to Third Interrogatories to Plaintiff; Instructions to Paralegal to prepare Notice of Production from Non-Party to get Plaintiff's cell records; Update case diary; Instructions to Paralegal about unanswered records Subpoenas	0.35	85.75
01/05/2022	PGG: : Proof Notice of Production from Non-Party to T-Mobile; Instructions to Paralegal; Update case diary for Subpoena issuance; Instructions to Paralegal about Notice of Production from Non-Party for update Subpoenas on Plaintiff's health care providers	0.35	85.75
01/20/2022	PGG: : Review and execute records subpoenas; Update case diary	0.15	36.75
01/20/2022	PGG: : Office conference with Paralegal about status of Sterling Medical records	0.10	24.50
01/20/2022	PGG: : Instructions to Paralegal to prepare Motion to Compel as to Third Interrogatories to Plaintiff	0.20	49.00
01/31/2022	PGG: : Review medical records from Sterling Medical; Instructions to Paralegal about Casemap	0.35	85.75

Subtotal: 367.50

Hours Summary:

- Patrick Gilligan (PGG): 1.50h @\$245.00 = \$367.50

BALANCE DUE**\$367.50**

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INVOICE # 64443**DATE 01/31/2022****MATTER**

Forsyth-JJ

CLAIM #

L001430074

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/05/2022	PGG: : Review Release and revise; Draft email to Attorney Mari about getting Final Judgment against Plaintiff	0.50	122.50
01/06/2022	PGG: : Telephone conference with Attorney McClellan about return of records reviewed for fee hearing; Instructions to Paralegal; Review revised Release; Draft email to Attorney Mari about same and Final Judgment against Ms. Juliano	0.35	85.75
01/18/2022	PGG: : Draft email to Attorney Mari about status of release	0.15	36.75
01/19/2022	PGG: : Read email from Attorney King about status of Settlement Agreement for 57.105 fees; Draft email to Attorney Mari about same	0.10	24.50
01/24/2022	PGG: : Draft email to and telephone conference with Ken Clements about release and lack of contact with Attorney Mari	0.20	49.00
01/31/2022	PGG: : Read and respond to email from Ken Clements about finalizing Release	0.10	24.50

Subtotal: 343.00

Hours Summary:

- Patrick Gilligan (PGG): 1.40h @\$245.00 = \$343.00

BALANCE DUE**\$343.00**

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INVOICE # 64440**DATE 01/31/2022****MATTER**

Goff, James

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/21/2022	PGG: : Office conference with Paralegal about subpoena for medical records from prior health care provider located in Virginia and need for domesticated subpoena	0.15	36.75
01/27/2022	PGG: : Draft good faith letter to Attorney Babiarz about claimed privilege to requested discovery	0.40	98.00
01/28/2022	PGG: : Revise good faith discovery letter to Attorney Babiarz	0.15	36.75
01/29/2022	PGG: : Review Proposal for Settlement; Forward to Risk; Update case diary for acceptance date; Update case diary for settlement negotiation history; Draft email to Carolyn Goodwine about presuit negotiations	0.40	98.00
01/31/2022	PGG: : Read and respond to email from Carolyn Goodwine about response to Proposal for Settlement and records review; Instructions to Paralegal about preparing \$100 Proposal for Settlement	0.40	98.00
			Subtotal: 367.50
	===== Expenses		
01/03/2022	ChartSwap: Medical records from Integrated Medical		29.00
			Subtotal: 29.00

Hours Summary:

- Patrick Gilligan (PGG): 1.50h @\$245.00 = \$367.50

BALANCE DUE**\$396.50**

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INVOICE # 64444**DATE 01/31/2022****MATTER**

Hernandez, Pedro

CLAIM #

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/14/2022	GPW: : Email correspondence with City Paralegal Shannon Crandall and Attorney Patrick Gilligan re deposition request from opposing counsel; Review Marion Tree information re corporate representative; Email opposing counsel re same	0.20	49.00
01/18/2022	PGG: : Office conference with Attorney Gwendolyn P. Williams about Motion for Summary Judgment; Read email from court reporter about transcripts	0.30	73.50
01/18/2022	GPW: : Office conference with Attorney Patrick Gilligan re Motion for Summary Judgment evidence; Office conference with City Paralegal Shannon Crandall re ordering deposition transcripts	0.20	49.00
01/19/2022	GPW: : Read emails from court reporter and update case diary	0.10	24.50
01/27/2022	PGG: : Office conference with Paralegal about setting pre-deposition conference with tree removal witness	0.10	24.50

Subtotal: 220.50

Hours Summary:

- GPW- PGG (GPW): 0.50h @\$245.00 = \$122.50
- Patrick Gilligan (PGG): 0.40h @\$245.00 = \$98.00

BALANCE DUE**\$220.50**

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INVOICE # 64445**DATE 01/31/2022****MATTER**

Brown, William Samuel (L0033...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/11/2022	PGG: : Review notice of appearance for new attorney; Instructions to Paralegal	0.10	24.50
01/19/2022	GPW: : Email City Paralegal Shannon Crandall re updating case diary and re status of production from non-parties; Review and edit Motion to Compel and email same to City Paralegal Shannon Crandall with instructions; Read email from City Paralegal Shannon Crandall re casemap and review of documents received	0.40	98.00
01/20/2022	GPW: : Update case diary re motion to compel	0.10	24.50
			Subtotal: 147.00

Hours Summary:

- GPW- PGG (GPW): 0.50h @\$245.00 = \$122.50
- Patrick Gilligan (PGG): 0.10h @\$245.00 = \$24.50

BALANCE DUE**\$147.00**

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INVOICE # 64439**DATE 01/31/2022****MATTER**

Marin, William & Janelle

CLAIM #

L001547753

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/03/2022	PGG: : Telephone conference with Ken Clements about case status and mediation; Office conference with Paralegal about mediation notice; Review revised mediation notice and forward to Risk/PMA; Review records for Janelle Marin from Dr. Fakhoury; Instructions to Paralegal; forward to Ken Clements for review; Review William Marin records from Dr. Fakhoury; forward to Ken Clements; Instructions to Paralegal and Draft email to Attorney Sydney Simmons about preparing mediation summary	1.50	367.50
01/03/2022	GPW: A105 L160: Office conferences and email with City Paralegal Shannon Crandall re error on Notice of Mediation Conference and communications with opposing counsel re same	0.10	24.50
01/03/2022	GPW: A105 L160: Email City Paralegal Shannon Crandall re reviewing new discovery documents received and casemapping same	0.10	24.50
01/04/2022	PGG: : Read email from Richard Dennis about attendance at mediation	0.10	24.50
01/05/2022	PGG: : Review and calendar mediation notice	0.15	36.75
01/07/2022	SMS: : Begin review of documents to prepare Mediation Report as to William Marin; Begin drafting Mediation Report; Email draft to Paralegal Shannon Crandall with instructions for finalization	1.70	416.50
01/10/2022	PGG: : Review and revise Mediation Statement	0.50	122.50
01/10/2022	GPW: : Read emails from Attorney Patrick Gilligan and Attorney Sydney Simmons re mediation statement and affirmative defenses; Review mediation statement and file re same	0.30	73.50
01/10/2022	SMS: : Email correspondence with Paralegal Shannon Crandall and Attorney Patrick Gilligan re files for mediation summary; Continue drafting mediation summary as to both Plaintiffs	1.10	269.50
01/11/2022	GPW: : Read emails from Attorney Patrick Gilligan and Attorney Sydney Simmons re Motion to Amend Affirmative Defenses; Office conference with City Paralegal Shannon Crandall re same and re	0.60	147.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	mediation statement issue re PIP coverage; Email correspondence with City Paralegal Shannon Crandall re drafting proposed Order; Telephone conference with Attorney Sydney Simmons re language included in Motion and for Order; Office conference with City Paralegal Shannon Crandall re same		
01/12/2022	SMS: : Email correspondence re Proposed Order on Motion to Amend Affirmative Defenses with Attorney Patrick Gilligan, Attorney Gwendolyn Williams, and Paralegal Shannon Crandall; Review and edit Paralegal Shannon Crandall's drafted proposed order	0.40	98.00
01/12/2022	GPW: : Email correspondence with Attorney Sydney Simmons re proposed order re amendment to affirmative defenses language; Review proposed Order; Office conference with City Paralegal Shannon Crandall re issues in same, re attachments from original Motion to Amend, and re drafting Amended Motion to Amend Affirmative Defenses and Proposed Order; Email City Paralegal Shannon Crandall edits and re next steps; Office conference with Attorney Chris Anderson re same	1	245.00
01/12/2022	CAA: : Office conference with Attorney Gwen Williams about motion practice	0.10	24.50
01/13/2022	SMS: : Email updated Mediation Summaries to Attorney Patrick Gilligan and to Paralegal Shannon Crandall re items needed to finalize summaries; Review file to search for records for same	0.30	73.50
01/13/2022	GPW: : Telephone conference with Attorney Patrick Gilligan re strategy re Amended Motion to Amend Affirmative Defenses	0.10	24.50
01/17/2022	GPW: : Read email from Attorney Sydney Simmons re mediation summary questions; Forward same to City Paralegal Shannon Crandall to follow up on PIP information; Office conference with Attorney Patrick Gilligan re proposal for settlement and re Amended Motion to Amend Affirmative Defenses	0.50	122.50
01/17/2022	PGG: : Draft Certificate of Authority for Mediation; Revise mediation summary; Instructions to Paralegal	0.60	147.00
01/17/2022	PGG: : Office conference with Paralegal and Attorney Gwendolyn P. Williams about Proposal for Settlement and upcoming mediation; Draft email to Ken Clements and Carolyn Goodwine about same	0.35	85.75
01/18/2022	PGG: : Update case diary for Boecher discovery	0.10	24.50
01/18/2022	PGG: : Read email from Paralegal about receipt of Dr. Fakhoury records; Instructions to Attorney Sydney Simmons about updating mediation statement	0.15	36.75
01/18/2022	SMS: : Update Mediation Summaries with updated medical records;	0.80	196.00
01/19/2022	PGG: : Read email from Ken Clements about Proposal for Settlement prior to mediation	0.10	24.50
01/19/2022	GPW: : Update case diary re proposal for settlement strategy	0.10	24.50
01/19/2022	SMS: : Email correspondence with City representatives, Paralegal Shannon Crandall, and Attorney Patrick Gilligan re updates to mediation summaries; Update mediation summaries;	0.30	73.50
01/20/2022	PGG: : Update mediation summaries; Instructions to Paralegal	0.60	147.00
01/24/2022	PGG: : Proof and approve response to request for copies from Plaintiffs	0.10	24.50
01/27/2022	GPW: : Review proposed Order re Amendment to Affirmative Defenses from City Paralegal Shannon Crandall; Office conference with City Paralegal Shannon Crandall re changes needed; Review final draft and instructions to City Paralegal Shannon Crandall re filing	0.20	49.00

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DATE	DESCRIPTION	HOURS	AMOUNT
01/28/2022	PGG: : Read email from Attorney Sackman about changing his mind about motion to amend; Instructions to Paralegal about setting for hearing	0.20	49.00
01/29/2022	PGG: : Read email from Judicial Assistant about proposed order on Motion to Amend; Instructions to Paralegal about same	0.15	36.75
01/31/2022	PGG: : Office conference with Paralegal and Attorney Gwendolyn P. Williams about mediation	0.60	147.00
01/31/2022	GPW: : Office conferences with Attorney Patrick Gilligan re mediation strategy and preparation; Begin review of file and Casemap and preparing for mediation; Office conference with City Paralegal Shannon Crandall re questions on proposals for settlement	3.20	784.00
01/31/2022	PGG: : Review order approving motion to amend affirmative defenses	0.10	24.50
			Subtotal: 3,969.00
===== Expenses			
01/17/2022	Owen & Associates: Deposition of Janelle and William Marin		135.00
			Subtotal: 135.00

Retainer information:

+ Previous account balance: \$0.00
+ New charges: \$4,104.00
- Previous retainer balance: \$400.00
- Payment made from retainer: \$400.00
= New account balance: \$3,704.00
= New retainer balance: \$0.00

BALANCE DUE

\$4,104.00

Hours Summary:

- GPW- PGG (GPW): 6.20h @\$245.00 = \$1,519.00
- Patrick Gilligan (PGG): 5.30h @\$245.00 = \$1,298.50
- SMS- PGG (SMS): 4.60h @\$245.00 = \$1,127.00
- Christopher Anderson (CAA): 0.10h @\$245.00 = \$24.50

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INVOICE # 64438**DATE 01/31/2022****MATTER**

Shadow Oaks

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
01/05/2022	PGG: A104 L300: Calendar Deposition notice of Heather Simpson; Instructions to Paralegal	0.10	24.50
01/05/2022	PGG: A107 L120: Telephone conference with Attorney Trip Green to prepare Case Management Report; Office conference with Attorney Sydney Simmons about preparing Initial Disclosures; Instructions to Paralegal; Review revised Case Management Report and Draft email to Attorney Green about changes; Instructions to Paralegal to schedule mediation	1	245.00
01/05/2022	SMS: A107 L190: Telephone conference with Attorney Trip Green and Attorney Patrick Gilligan to prepare Case Management Report; Office conference with Attorney Patrick Gilligan about preparing Initial Disclosures; Instructions to Paralegal and follow up email re same	0.50	122.50
01/06/2022	PGG: A103 L120: Draft Initial Disclosures; Update case diary; Instructions to Paralegal about calendaring due dates from Case Management Report	0.50	122.50
01/06/2022	SMS: A105 L120: Review Rule 26 Disclosures and emails from Paralegal Shannon Crandall re same; Discussion with Paralegal Shannon Crandall re same	0.30	73.50
01/11/2022	PGG: A107 L160: Read and respond to email from Attorney Green's office about scheduling mediation; Review Court Order referring to mediation; Instructions to Paralegal; Review Order for Referral to magistrate judge; Review Case Management Order; Instructions to Paralegal to Update case diary	0.50	122.50
01/11/2022	GPW: A105 L140: Telephone conference with Attorney Patrick Gilligan re attending pretrial conference; Office conference with City Paralegal Shannon Crandall re filing notices of appearance	0.20	49.00
01/14/2022	GPW: A107 L190: Review docket and Order re hearing; Message to City Paralegal Shannon Crandall re hearing information; Telephone conference with Linda Caldwell re hearing information; Prepare for and attend hearing; Follow up telephone conference with Attorney	0.50	122.50

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DATE	DESCRIPTION	HOURS	AMOUNT
01/14/2022	Patrick Gilligan re outcome and next steps GPW: A105 L160: Email correspondence with Attorney Patrick Gilligan and opposing counsel re scheduling different mediator; Email City Paralegal Shannon Crandall re same and re filing notice of appearance	0.20	49.00
01/14/2022	GPW: A107 L300: Email correspondence with opposing counsel re their request for extension to respond to discovery requests; Email City Paralegal Shannon Crandall re same	0.10	24.50
01/14/2022	PGG: A107 L160: Read email from Attorney Green and his Paralegal about scheduling mediation; Instructions to Paralegal and Attorney Gwendolyn P. Williams about selection of mediator	0.35	85.75
01/17/2022	PGG: A104 L160: Review Notice of Selection of Mediator to Court; Review and Calendar amended mediation notice	0.20	49.00
01/18/2022	PGG: A104 L140: Review and confirm calendar dates from Court's Case Management Order	0.35	85.75
01/19/2022	PGG: A104 L300: Review Interrogatory answers from Plaintiff; Instructions to Paralegal about Casemap and preparing deposition notebook; Draft good faith letter concerning inadequacy of the every responses; Instructions to Paralegal about preparing additional Request to Produce; Proof and revise good faith letter and Request to Produce	1	245.00
01/19/2022	GPW: A104 L310: Review answers to first interrogatories from Plaintiff; Read emails from Attorney Patrick Gilligan and City Paralegal Shannon Crandall re next steps and good faith letter	0.20	49.00
01/20/2022	GPW: A105 L200: Office conference with City Paralegal Shannon Crandall re initial disclosures	0.10	24.50
01/20/2022	PGG: A107 L300: Read and respond to email from Attorney Green about providing updated Interrogatory answers	0.10	24.50
01/24/2022	PGG: A106 L110: Read email from Ken Clements about discovery and setting Depositions; Review response from Paralegal	0.15	36.75
01/28/2022	PGG: A104 L110: Review Google Earth Map showing Pioneer and Shadow Oaks locations; Instructions to Paralegal about Casemap and getting utility bills for Pioneer and Shadow Oaks and property records showing relative positions	0.25	61.25
01/29/2022	PGG: A104 L110: Review property investigation on Shadow Oaks and Pioneer Mobile Home Parks	0.40	98.00
01/29/2022	PGG: A104 L300: Review amended answers to Interrogatories; Instructions to Paralegal about handling and setting up meeting with client and Jimmy Pogue to discuss	0.50	122.50
01/31/2022	PGG: A104 L110: Review investigation done by Paralegal on corporate status of Pioneer Mobile Home Park	0.35	85.75
			Subtotal: 1,923.25

Hours Summary:

- Patrick Gilligan (PGG): 5.75h @\$245.00 = \$1,408.75
- GPW- PGG (GPW): 1.2h @\$245.00 = \$294.00
- SMS- PGG (SMS): 0.8h @\$245.00 = \$196.00
- Gwen Pasteur Williams (GPW): 0.1h @\$245.00 = \$24.50

BALANCE DUE

\$1,923.25

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