

Gilligan, Anderson, Phelan, Williams & Green, P.A.  
1531 SE 36th Ave.  
Ocala, FL 34471  
Risk Management  
2701 North Rocky Pointe Drive  
Suite 250  
Tampa, FL 33607  
**Date:** 3/6/2024

Invoice	Matter	Fees	Expenses	Other	Total
67005	Shadow Oaks	\$400.00	\$90.00	\$0.00	\$490.00
67006	Melkonian & Secki	\$955.00	\$0.00	\$0.00	\$955.00
67007	Hernandez, Pedro	\$1,138.75	\$0.00	\$0.00	\$1,138.75
67008	Goff, James	\$25.00	\$0.00	\$0.00	\$25.00
67009	American Humanist Assn	\$143.75	\$0.00	\$0.00	\$143.75
67010	Williams and Greene (L003434864)	\$271.25	\$0.00	\$0.00	\$271.25
Total		\$2,933.75	\$90.00	\$0.00	\$3,023.75

**Gilligan, Anderson, Phelan, Williams & Green, 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 #** 67009

**DATE** 02/29/2024

**MATTER**

American Humanist Assn

**CLAIM #**

L001400263

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/08/2024	Patrick Gilligan: Read email from City Attorney Will Sexton about stipulation to substitute counsel; Draft email to him about transferring files and representation by ACLJ	0.35	113.75
02/08/2024	SC: Review email memo and Motion to Sub Counsel from City Attorney; Office conference with Attorney Patrick Gilligan regarding same; Prepare and send response email to City Attorney regarding Motion to Sub Counsel	0.20	20.00
02/09/2024	SC: Review email instruction from Attorney Patrick Gilligan; Review Joint Motion to Sub Counsel; Revise same; Prepare and send email to City Attorney attaching same	0.10	10.00
			Subtotal: 143.75

Hours Summary:

- Patrick Gilligan (Patrick Gilligan): 0.35h @\$325.00 = \$113.75

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

**BALANCE DUE**

**\$143.75**

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

**INVOICE #** 67008  
**DATE** 02/29/2024

**MATTER**  
Goff, James

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/06/2024	SC: Email exchange with opposing counsel regarding status of dismissal	0.10	10.00
02/06/2024	SC: Review email instruction from Attorney Patrick Gilligan; Review filed dismissal; Prepare and send email to client attaching release and dismissal	0.15	15.00
			Subtotal: 25.00

Hours Summary:  
- SC- PGG (SC): 0.25h @\$100.00 = \$25.00

**BALANCE DUE**  
**\$25.00**

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Suite 250  
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**INVOICE #** 67007**DATE** 02/29/2024**MATTER**

Hernandez, Pedro

**CLAIM #**

L003096785

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/05/2024	Patrick Gilligan: Instructions to Paralegal to set up trial preparation meeting	0.10	32.50
02/06/2024	SC- GPW: Draft trial subpoenas (10); Draft subpoena letters to witnesses (8); Prepare and send email to Attorney Gwen Williams attaching same for review	0.80	80.00
02/06/2024	SC- GPW: Prepare Motion to Compel Plaintiff's response to City's Expert Request to Produce; Prepare and send email to Attorney Gwen Williams attaching same for review and approval	0.50	50.00
02/06/2024	SC- GPW: Prepare Notice of Serving Third Interrogatories and Third Interrogatories; Prepare and send email to Attorney Gwen Williams attaching same for review and approval	0.30	30.00
02/07/2024	Gwen Pasteur Williams: Review and redline Motion to Compel from Paralegal Shannon Crandall; Email draft to Paralegal Shannon Crandall for finalization and filing	0.20	65.00
02/07/2024	Gwen Pasteur Williams: Review and edit Letters and Subpoenas to witnesses from Paralegal Shannon Crandall; Email redline to Paralegal Shannon Crandall for finalization and sending	0.20	65.00
02/07/2024	SC- GPW: Review email from Attorney Gwen Williams; Revise and finalize Motion to Compel response to Expert Request to Produce; File and serve same; Update case diary and calendar response deadline; Prepare and send email to client attaching same	0.40	40.00
02/07/2024	Gwen Pasteur Williams: Review Third Interrogatories and Notice of Serving same to Plaintiff from Paralegal Shannon Crandall; Email Paralegal Shannon Crandall re finalizing and sending same	0.10	32.50
02/07/2024	SC- GPW: Review email instruction from Attorney Gwen Williams; Revise and finalize Notice of Serving Third Interrogatories and Third Interrogatories; File and serve same on attorney for Plaintiff; Calendar due date for response; Update case diary; Prepare and send email to client attaching same	0.50	50.00
02/07/2024	SC- GPW: Review Plaintiff's Omnibus Motion in Limine; Calendar	0.20	20.00

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DATE	DESCRIPTION	HOURS	AMOUNT
	response due date; Update case diary; Prepare and send email to client attaching same		
02/07/2024	SC- GPW: Review email instruction from Attorney Gwen Williams; Revise letters to accompany subpoenas (8); Prepare and send email to Attorney Gwen Williams regarding same	0.20	20.00
02/07/2024	Patrick Gilligan: Review Plaintiff's Motion in Limine; Draft email to Attorney Gwendolyn P. Williams about response; Read email from Plaintiff's Attorney about mediation; Draft email to Attorney Gwendolyn P. Williams about strategy; Office conference with Paralegal about discovery status	0.50	162.50
02/07/2024	Gwen Pasteur Williams: Read Motion in Limine filed by opposing counsel; Read email from Attorney Patrick Gilligan re response	0.20	65.00
02/07/2024	Gwen Pasteur Williams: Read email from opposing counsel re extension for expert responses and proposal for mediation; Emails and office conference with Attorney Patrick Gilligan and Paralegal Shannon Crandall re same; Email Richard Dennis re same	0.40	130.00
02/08/2024	Patrick Gilligan: Read email from City Attorney Will Sexton about stipulation to substitute counsel; Draft email to him about transferring files and pending trial	0.35	113.75
02/08/2024	SC: Review email memo and proposed Motion to Sub Counsel from City Attorney; Office conference with Attorney Patrick Gilligan and Attorney Gwen Williams regarding tasks for transferring case to City Attorney	0.25	25.00
02/08/2024	SC: Review email instruction from Attorney Patrick Gilligan; Revise Motion to Sub Counsel; Prepare and send email to Attorney Patrick Gilligan attaching same	0.10	10.00
02/08/2024	SC: Review email instruction from Attorney Patrick Gilligan; Prepare and send email to City Attorney attaching executed Motion to Sub Counsel	0.10	10.00
02/08/2024	SC: Create electronic file, pdf calendar appointments, deadlines and case diary; Prepare and send email to City Attorney transferring all files and providing update of upcoming deadlines and email for response	0.40	40.00
02/08/2024	Gwen Pasteur Williams: Read email from City Attorney re taking over case; Office conference with Paralegal Shannon Crandall and Attorney Patrick Gilligan re same, stipulated motion, and deadlines	0.20	65.00
02/12/2024	Patrick Gilligan: Instructions to Paralegal concerning proposed Order to Court on substitution of counsel	0.10	32.50
			Subtotal: 1,138.75

Hours Summary:

- Gwen Pasteur Williams (Gwen Pasteur Williams): 1.30h @\$325.00 = \$422.50  
- Patrick Gilligan (Patrick Gilligan): 1.05h @\$325.00 = \$341.25  
- SC- GPW (SC- GPW): 2.90h @\$100.00 = \$290.00  
- SC- PGG (SC): 0.85h @\$100.00 = \$85.00

BALANCE DUE

**\$1,138.75**

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**INVOICE # 67006****DATE 02/29/2024****MATTER**

Melkonian & Secki

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/01/2024	Patrick Gilligan: Proof updated health care Interrogatories to Plaintiffs; Instructions to Paralegal; Proof expert Interrogatories and Request to Produce	0.60	195.00
02/01/2024	SC: Review email instruction from Attorney Patrick Gilligan; Draft Update Request to Produce to Plaintiff Melkonian; Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.35	35.00
02/01/2024	SC: Office conference with Attorney Patrick Gilligan regarding expert discovery requests; As to Michael Secki: Draft Notice of Serving Expert Interrogatories, Expert Interrogatories and Expert Request to Produce; As to Tiffany Melkonian: Draft Notice of Serving Expert Interrogatories, Expert Interrogatories and Expert Request to Produce; Prepare and send email to Attorney Patrick Gilligan attaching all for review and approval	0.75	75.00
02/03/2024	SC: Review Melkonian Witness List; Update case diary	0.10	10.00
02/05/2024	SC: Review and respond to email from Attorney Patrick Gilligan regarding discrepancy in Melkonian and Secki Witness Lists	0.10	10.00
02/05/2024	Patrick Gilligan: Read email from Paralegal about Plaintiffs' amended witness list	0.10	32.50
02/08/2024	SC: Review fax from Sierra Surgical; Call to Sierra Surgical regarding receipt of records after payment; Email exchange with office manager regarding same	0.10	10.00
02/08/2024	SC: Draft Pretrial Statement; Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.60	60.00
02/12/2024	Patrick Gilligan: Draft email to City Attorney Will Sexton about handling of case	0.10	32.50
02/12/2024	Patrick Gilligan: Proof Draft Pretrial Conference Statement; Read and respond to email from Paralegal about listing Motion in Limine	0.40	130.00
02/12/2024	SC: Email exchange with Attorney Patrick Gilligan; Revise Pretrial Statement	0.30	30.00

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DATE	DESCRIPTION	HOURS	AMOUNT
02/15/2024	SC: Revise non-party subpoenas for Melkonian and Secki for update records; Prepare same for signature and submit to Attorney Patrick Gilligan to issue	0.25	25.00
02/15/2024	Patrick Gilligan: Review and execute records Subpoenas for updated medical records; Instructions to Paralegal	0.35	113.75
02/16/2024	SC: Finalize non-party update subpoenas and send out for service to providers; Update case diary	0.30	30.00
02/22/2024	Patrick Gilligan: Review answers to expert Interrogatories and response to Request to Produce	0.35	113.75
02/29/2024	Gwen Pasteur Williams: Office conference with Paralegal Shannon Crandall re pending tasks and status of case	0.10	32.50
02/29/2024	SC- GPW: Office conference with Attorney Gwen Williams re pending tasks and status of case	0.10	10.00
02/29/2024	SC: Phone call with Jennifer at Sierra Surgical regarding outstanding records; Prepare and send follow up email to Jennifer regarding same	0.10	10.00
			Subtotal: 955.00

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Hours Summary:

- Patrick Gilligan (Patrick Gilligan): 1.90h @\$325.00 = \$617.50
- SC- PGG (SC): 2.95h @\$100.00 = \$295.00
- Gwen Pasteur Williams (Gwen Pasteur Williams): 0.10h @\$325.00 = \$32.50
- SC- GPW (SC- GPW): 0.10h @\$100.00 = \$10.00

**BALANCE DUE**

**\$955.00**

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Representative  
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**INVOICE #** 67005  
**DATE** 02/29/2024

**MATTER**  
Shadow Oaks

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/14/2024	SC: Email exchange with Attorney Patrick Gilligan regarding foreign judgment status; Call to Clerk's office regarding same	0.15	15.00
02/15/2024	SC: Review email documents from Breanna at Clerk's office; Revise Writ of Execution; File same to be issued by Clerk; Update case diary	0.25	25.00
02/15/2024	Patrick Gilligan: Review Writ of Execution; Draft email to Paralegal about issuance	0.25	81.25
02/21/2024	Patrick Gilligan: Review executed Writ of Execution; Instructions to Paralegal	0.15	48.75
02/22/2024	SC: Update interest calculations; Update Motion for Writ of Garnishment and Writ of Garnishment; Prepare and send email to Attorney Patrick Gilligan attaching same for review and approval	0.50	50.00
02/22/2024	Patrick Gilligan: Draft Motion Writ of Garnishment and Writ of Garnishment	0.40	130.00
02/29/2024	SC: Review email instruction from Attorney Patrick Gilligan; Revise and finalize Motion for Writ of Garnishment and Writ of Garnishment; File same; Update case diary for issuance and return of Writ of Garnishment; Office conference with Attorney Patrick Gilligan regarding date for service of garnishment to bank	0.40	40.00
02/29/2024	SC: Review and respond to email from Derek Fay at Chubb regarding status	0.10	10.00
			Subtotal: 400.00
	===== Expenses		
02/29/2024	Marion County Clerk of Court: Garnishment filing fee		90.00
			Subtotal: 90.00

Retainer information:  
+ Previous account balance: \$0.00

**BALANCE DUE**  
**\$490.00**

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



+ New charges: \$490.00  
- Previous retainer balance: \$0.00  
- Payment made from retainer: \$0.00  
= New account balance: \$490.00  
= New retainer balance: \$0.00

Hours Summary:

- Patrick Gilligan (Patrick Gilligan): 0.80h @\$325.00 = \$260.00  
- SC- PGG (SC): 1.40h @\$100.00 = \$140.00

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Mgmt.

Attn: Senior Account Claims

Representative

2701 North Rocky Pointe Drive

Suite 250

Tampa, FL 33607

**INVOICE #** 67010**DATE** 02/29/2024**MATTER**

Williams and Greene (L003434...

DATE	DESCRIPTION	HOURS	AMOUNT
	===== Services		
02/12/2024	Patrick Gilligan: Draft email to City Attorney Will Sexton about handling of case	0.10	32.50
02/19/2024	Patrick Gilligan: Review and revise Request for Admissions as to ownership of power poles; Instructions to Paralegal	0.15	48.75
02/20/2024	Patrick Gilligan: Proof and revise Request for Admissions	0.20	65.00
02/20/2024	SC: Email exchange with Attorney Patrick Gilligan regarding referenced photo in Request for Admissions	0.10	10.00
02/20/2024	SC: Review email instruction from Attorney Patrick Gilligan regarding Request for Admissions; Follow up office conference regarding same; Revise and finalize Request for Admission; File and serve same; Update case diary and calendar due date	0.40	40.00
02/26/2024	Patrick Gilligan: Read email from Plaintiff's Attorney about Court approving stipulation for trial date	0.10	32.50
02/29/2024	Gwen Pasteur Williams: Office conference with Paralegal Shannon Crandall re pending tasks and status of case	0.10	32.50
02/29/2024	SC- GPW: Office conference with Attorney Gwen Williams re pending tasks and status of case	0.10	10.00

Subtotal: 271.25

## Hours Summary:

- Patrick Gilligan (Patrick Gilligan): 0.55h @\$325.00 = \$178.75

- SC- PGG (SC): 0.50h @\$100.00 = \$50.00

- Gwen Pasteur Williams (Gwen Pasteur Williams): 0.10h @\$325.00 = \$32.50

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

**BALANCE DUE****\$271.25**

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