CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425 Page: 1 04/04/2017 「NO: 306-9905029

ACCOUNT NO: STATEMENT NO:

6-9905029 14769

Attn: Lynn Swanson

adv. Ford, Sharron (negligence arrest)

Billing Category 18-RLO

				HOUDE	
02/02/2017	TAD	Descipt and review of metion for every	and in demand and arrangeting manager	HOURS	
03/02/2017	TAD	Receipt and review of motion for summa of law.	ary judgment and supporting memo	0.30	
03/13/2017	TAD	Prepare correspondence to outside cour motions and information on claim and co	0.60		
03/14/2017	TAD	Attend mediation of claim. Prepare corre	espondence to the City re: same,.	4.80	
03/16/2017	TAD	Receipt of correspondence from outside counsel re: mediation and status. Review incident report.		0.30	
		FOR CURRENT SERVICES RENDERE	D	6.00	1,170.00
	RECAPITULATION				
	TIME	<u>(EEPER</u>	HOURS HOURLY RATE	<u>TOTAL</u>	
	TRAC	EY A. DECARLO	6.00 \$195.00	\$1,170.00	
		TOTAL CURRENT WORK			1,170.00
		BALANCE DUE			\$1,170.00

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905037

STATEMENT NO:

14770

Attn: Lynn Swanson

adv. Fitting, Cynthia (MVA)

Billing Category: 18-RLO Claim #001470-000325-GB-01

03/17/2017 JAC review order of dismissal and discuss post case issues with TD 0.40

FOR CURRENT SERVICES RENDERED 0.40 78.00

RECAPITULATION

TIMEKEEPER HOURS HOURLY RATE TOTAL JAMES A. CHEROF 0.40 \$195.00 \$78.00

TOTAL CURRENT WORK 78.00

BALANCE DUE \$78.00

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905056

STATEMENT NO:

14771

Attn: Lynn Swanson

adv. Laster, Torami (slip & fall)

Billing Category 18-RLO Claim #001470-000342-GB-01

		Claim #001470-000342-GB-01				
03/22/2017	IR	Conference with TAD regarding directives	of discovery receiv	ved from	HOURS	
03/22/2017	шх	Conference with TAD regarding directives of discovery received from counsel for Plaintiff [on CD]; initial review of medical records summary.  FOR CURRENT SERVICES RENDERED			0.20	
					0.20	25.00
		RECAPIT <u>KEEPER</u> IID RIERA	TULATION <u>HOURS</u> <u>HOU</u> 0.20	<u>JRLY RATE</u> \$125.00	<u>TOTAL</u> \$25.00	
		TOTAL CURRENT WORK				25.00
		BALANCE DUE				\$25.00

Page: 1 04/04/2017

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO: STATEMENT NO:

306-9905062 14772

6.00

6.00

1,117.50

Attn: Lynn Swanson

03/08/2017

Parking - TAD

TOTAL ADVANCES THRU 03/31/2017

TOTAL CURRENT WORK

Parking -

adv. Mina, German (slip & Fall)

Billing Category: 18-RLO Claim #001470-000340-GB-01

			HOURS	
03/08/2017	TAD	Attend hearing on motion to continue trial from plaintiff. Confer with plaintiff re: status of claim.	4.20	
03/09/2017	TAD	Receipt and review of order on motion to continue trial. Prepare correspondence to City re: hearing and order. Receipt of correspondence from adjuster and city re: same. Receipt of correspondence re: depositions of physicians and prepare response to same.	0.50	
03/10/2017	TAD	Receipt of correspondence from the Plaintiff re: additional depositions and review records from City re: same.	0.30	
03/17/2017	TAD	Telephone conference with medical expert and prepare correspondence re: same. Review discovery responses re: City personnel and prepare correspondence to the City re: same.	0.50	
03/29/2017	JAC	review Order striking from calendar and discuss with TD	0.20	
		FOR CURRENT SERVICES RENDERED	5.70	1,111.50
	JAME	RECAPITULATION  KEEPER S A. CHEROF CEY A. DECARLO  RECAPITULATION HOURS HOURLY RATE 0.20 \$195.00 195.00	TOTAL \$39.00 1,072.50	

CITY OF BOYNTON BEACH

ACCOUNT NO: 306-9905062 STATEMENT NO: 14772

04/04/2017

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adv. Mina, German (slip & Fall)

**BALANCE DUE** \$1,117.50

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905064

STATEMENT NO:

14773

Attn: Lynn Swanson

adv. Kimsey, Erin (MVA)

Billing Category 18-RLO Claim #001470-000228-AB-01

				HOURS	
03/17/2017	TAD Receipt and review of correspondence from adjuster re: status. Review file re: status and docket re: claims and prepare response to adjuster.			0.50	
		FOR CURRENT SERVICES RE	ENDERED	0.50	97.50
			RECAPITULATION		
		<u>KEEPER</u> CEY A. DECARLO	<u>HOURS</u> <u>HOURLY RATE</u> 0.50 \$195.00	<u>TOTAL</u> \$97.50	
		TOTAL CURRENT WORK			97.50
		BALANCE DUE			\$97.50

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

04/04/2017 ACCOUNT NO: 306-9905066 STATEMENT NO: 14774

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\$473.50

Attn: Lynn Swanson

adv. Gregory, Mola (slip & fall)

Billing Category: 18-RLO Claim #001470-000341-GB-01

**BALANCE DUE** 

			Н	OURS	
03/15/2017	TAD	Receipt of discovery responses from the Plaintiff and review same r deposition of the plaintiff.	<b>ə</b> :	1.40	
03/17/2017	TAD	Telephone conference with Plaintiff counsel re: deposition of plaintif discovery issues.	and	0.30	
03/21/2017	TAD	Receipt of correspondence from plaintiff re: depositions of City emp	oyees.	0.20	
03/22/2017	IR	Conference with TAD regarding discovery received from Plaintiff's c			
		and directives relating to same; reviewed attached records and preptickler regarding same.	ared	0.20	
03/23/2017	TAD	Receipt of correspondence from plaintiff counsel re: depositions and	I	0.00	
		prepare response to same re: issues with City personnel.		0.20	
03/30/2017	TAD	Receipt and review of correspondence from adjuster re: status and			
		prepare response to same.		0.20	
		FOR CURRENT SERVICES RENDERED		2.50	473.50
		RECAPITULATION			
	TIME	KEEPER HOURS HOURLY F	RATE TOT	AL	
	INGR	ID RIERA 0.20 \$12	25.00 \$25	.00	
	TRAC	CEY A. DECARLO 2.30 19	95.00 448	.50	
		TOTAL CURRENT WORK		2	473.50

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425 04/04/2017 ACCOUNT NO: 306-9905069 STATEMENT NO: 14775

Page: 1

.50

Attn: Lynn Swanson

adv. Oldham, Dana (fall)

### Billing Category 18-RLO Claim #001470-000346-GB-01

			HOURS	
03/02/2017	TAD	Receipt and review of correspondence re deposition of the plaintiff and mediation. Prepare response to same. Prepare correspondence to plaintiff re: mediation issues. Telephone conference with adjuster re:status.	0.80	
03/06/2017	TAD	Receipt and review of correspondence from Any Kind counsel re: mediation and receipt of plaintiffs response to same.	0.30	
03/07/2017	TAD	Receipt and review of correspondence re: mediation. Prepare correspondence to adjuster re: issues with plaintiff and mediation status.	0.60	
03/08/2017	TAD	Receipt and review of correspondence re: plaintiff medical conditions and past medical issues. Receipt of correspondence re: pre-mediation report and prepare response to same. Receipt of correspondence re: deposition of plaintiff and prepare response to same.	0.40	
03/13/2017	TAD	Receipt and review correspondence from plaintiff re: mediation and medical issues. Receipt of correspondence re: response to non-party subpoena and prepare response to same.	0.20	
03/15/2017	TAD	Receipt of certificate of non-objection re: Cleveland Clinic subpoena. Receipt of re-notice of deposition of plaintiff.	0.20	
03/21/2017	TAD	Receipt of correspondence from plaintiff re: mediation and depositions and prepare response to same.	0.20	
03/27/2017	TAD	Receipt and review of information from adjuster re: prior claims of plaintiff. Review criminal and civil history of plaintiff. Prepare correspondence to City and adjuster re: same.	0.80	
03/31/2017	TAD	Receipt of correspondence re: mediation and prepare response to same.  FOR CURRENT SERVICES RENDERED	0.20 3.70	721.

CITY OF BOYNTON BEACH

ACCOUNT NO: STATEMENT NO: 04/04/2017 306-9905069 14775

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adv. Oldham, Dana (fall)

RECAPITULATION

TIMEKEEPER HOURS HOURLY RATE TOTAL TRACEY A. DECARLO 3.70 \$195.00 \$721.50

TOTAL CURRENT WORK 721.50

BALANCE DUE \$721.50

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO: STATEMENT NO:

306-9905073 14776

Attn: Lynn Swanson

adv. Robinson, Bennie (false arrest)

Billing Category 18-RLO Claim #001470-000336-GB-01

		Claim #00 1470-000330-GB-0 1		
03/15/2017	TAD	Receipt of correspondence from Harris counsel re: Mills deposition.	HOURS	
03/13/2017	Prepare correspondence to the City re: same. Prepare correspondence to Harris counsel r e potential settlement issues.		0.40	
03/16/2017	TAD	Receipt of correspondence from the plaintiff re: deposition of city employee. Receipt of correspondence from Davis counsel re: depositions. Receipt of records from plaintiff re: additional disclosures.	0.80	
03/17/2017	TAD	Receipt of incident report and prepare correspondence to city re: same. Receipt of notice of depositions.	0.50	
03/20/2017	TAD	Receipt and review of correspondence from plaintiff counsel re: deposition of Mills.  FOR CURRENT SERVICES RENDERED	0.10 1.80	<del></del> 351.00
		FOR CORRENT SERVICES REINDERED	1.60	331.00
		RECAPITULATION  KEEPER HOURS HOURLY RATE  CEY A. DECARLO 1.80 \$195.00	<u>TOTAL</u> \$351.00	
		TOTAL CURRENT WORK		351.00
		BALANCE DUE		\$351.00

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425 04/04/2017 ACCOUNT NO: 306-9905083 STATEMENT NO: 14777

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Attn: Lynn Swanson

adv. Galindez, Dennis (slip & fall)

Billing Category: 18-RLO Claim #001470-000330-GB-01

			HOURS	
03/01/2017	TAD	Prepare correspondence to city re: trial setting. Receipt of correspondence from adjuster re: status and prepare response to same.	0.40	
03/02/2017	TAD	Receipt and review of order on motion to strike affirmative defenses from First Genesis Answer.	0.10	
03/03/2017	TAD	Receipt and review of notice of deposition of Clty employees. Prepare correspondence to Brode and Mootz re: depositions and meetings before deposition.	0.30	
03/06/2017	TAD	Receipt and review of correspondence re: depositions of city employees. Receipt of correspondence from City re: same. Prepare correspondence to City re: information on depositions and incident.	0.40	
03/07/2017	TAD	Receipt and review Receipt of notice of deposition of Brady and Mootz. Prepare revised budget for claim.	0.90	
03/09/2017	TAD	Prepare correspondence to plaintiff re: information on Mootz and receipt of response to same. Receipt of First Genesis Amended Answer and Affirmative Defenses. Receipt of notice of deposition of plaintiffs.	0.60	
03/13/2017	TAD	Receipt and review of correspondence from court re: e-calendar call requirements.	0.20	
03/16/2017	TAD	Receipt of revised trial order and prepare memorandum re: deadlines and requirements.	0.40	
03/21/2017	TAD	Receipt of request for production, request for admissions and interrogatories to City. Prepare correspondence to the City re: response to discovery. Review records from facilities re: response to request for production.  FOR CURRENT SERVICES RENDERED	1.40 4.70	916.50

04/04/2017

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ACCOUNT NO: 306-9905083 STATEMENT NO: 14777

adv. Galindez, Dennis (slip & fall)

RECAPITULATION

**TIMEKEEPER HOURS HOURLY RATE TOTAL** TRACEY A. DECARLO \$916.50 4.70 \$195.00

03/28/2017 Parking - TAD 4.00

> Parking -4.00

> 4.00 TOTAL ADVANCES THRU 03/31/2017

> TOTAL CURRENT WORK 920.50

> **BALANCE DUE** \$920.50

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425 04/04/2017 ACCOUNT NO: 306-9905092 STATEMENT NO: 14778

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Attn: Lynn Swanson

adv. Caliskan, Hasan (MVA)

Billing Category: 18-RLO Claim #001470-000354-AB-02

			HOURS	
03/06/2017	TAD	Review claims and damage information; review discovery responses and prepare for mediation of matter.	2.40	
03/09/2017	TAD	Receipt and review of information from plaintiff re: medical damages. Confer with city re: mediation issues. Prepare statement to mediator. Prepare certificate of mediation authority.	1.80	
03/13/2017	TAD	Attend mediation of claim. Confer with city re: continuing litigation issues. Receipt of mediation report.	5.40	
03/16/2017	TAD	Prepare correspondence to plaintiff re: mediation agreement and receipt of response to same.	0.30	
03/20/2017	TAD	Receipt and review of notice of hearing on motion to continue and motion. Receipt of correspondence to court re: motion.	0.30	
03/24/2017	TAD	Receipt and review of plaintiff's motion to strike and exhibits to same. Review case law and statutes from plaintiff.	1.30	
03/27/2017	TAD	Receipt and review of surveillance interrogatories to City. Receipt of correspondence from plaintiff counsel re: hearings and prepare response to same.	0.50	
		same.	0.50	
03/29/2017	TAD	Attend hearing on motion to continue trial. Confer with plaintiff re: settlement issues.	3.20	
	JAC	review Motion to Strike Affirmative Defenses and research cases	0.90	
03/30/2017	TAD	Receipt and review order resetting trial. Prepare correspondence to City resame and motion to strike. Review statute and case law resresponse to motion to strike.	1.80	
		FOR CURRENT SERVICES RENDERED	17.90	3,490.50

CITY OF BOYNTON BEACH

ACCOUNT NO: 306-9905092 STATEMENT NO: 14778

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04/04/2017

adv. Caliskan, Hasan (MVA)

RECAPITULATION

**TIMEKEEPER** HOURS HOURLY RATE **TOTAL** JAMES A. CHEROF \$175.50 0.90 \$195.00 TRACEY A. DECARLO 17.00 195.00 3,315.00

**Photocopies** 8.40 TOTAL EXPENSES THRU 03/31/2017 8.40

TOTAL CURRENT WORK 3,498.90

**BALANCE DUE** \$3,498.90

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO: STATEMENT NO:

04/04/2017 306-9905093

14779

Attn: Lynn Swanson

adv. Jenkins, Gail and Leon (Demolition)

Billing Code: 18-RLO

		Claim #001470-000382-GD-01			
03/20/2017	TAD	•	wer and affirmative defenses. Review and motion to strike affirmative defenses.	HOURS 0.90	
03/30/2017	TAD	Receipt and review of correspondence re: deposition of Mack and prepare response to same.  FOR CURRENT SERVICES RENDERED		0.20 1.10	214.50
		F KEEPER EY A. DECARLO	RECAPITULATION  HOURS HOURLY RATE  1.10 \$195.00	<u>TOTAL</u> \$214.50	
		TOTAL CURRENT WORK			214.50
		BALANCE DUE			\$214.50

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

04/04/2017 ACCOUNT NO: 306-9905097

STATEMENT NO:

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14780

Attn: Lynn Swanson

adv. Baez, Estela (slip & fall)

Billing Category 18-RLO Claim #001470-000364-GB-01

			HOURS	
03/02/2017	TAD	Receipt and review of correspondence re: release and settlement issues from plaintiff and Natrionwide.	0.30	
03/03/2017	TAD	Receipt and review correspondence from adjuster re: status. Receipt of correspondence from plaintiff and Nationwide re:settlement issues. Prepare correspondence to adjuster and City re: status and release information.	0.40	
03/16/2017	TAD	Receipt of correspondence from plaintiff re: dismissal. Prepare stipulation and proposed order of dismissal and prepare correspondence to plaintiff re: same.	0.50	
03/20/2017	TAD	Receipt and review of order of dismissal. Prepare correspondence to the City re: same.  FOR CURRENT SERVICES RENDERED	0.30 1.50	292.50
		RECAPITULATION		
		KEEPERHOURSHOURLY RATECEY A. DECARLO1.50\$195.00	<u>TOTAL</u> \$292.50	
		TOTAL CURRENT WORK		292.50
		BALANCE DUE		\$292.50

ACCOUNT NO:

306-9905102 STATEMENT NO:

Page: 1

14781

\$507.00

04/04/2017

Attn: Lynn Swanson

adv. Blutcher, Pamela (MVA)

CITY OF BOYNTON BEACH

Boynton Beach FL 33425

100 East Boynton Beach Boulevard

Billing Category - 18RLO Claim #001470-000369-AB-01

**BALANCE DUE** 

			HOURS	
03/03/2017	TAD	Revise City's interrogatory answers. Prepare correspondence to parks manager re: revised answers.	0.40	
03/08/2017	TAD	Receipt and review of order on motion to compel plaintiff. Receipt of order on motion to compel City.	0.20	
03/20/2017	TAD	Receipt and review of correspondence re: revised interrogatory answers and prepare correspondence to City re: same.	0.30	
03/27/2017	TAD	Telephone conference with City representative re: amended discovery responses. Revise answers to interrogatories and prepare correspondence re: same. Receipt of information from adjuster re: prior claims. Review information on plaintiff re: criminal and civil records and prepare correspondence re: same. Prepare correspondence to plaintiff counsel response to discovery and deposition of plaintiff.		
03/28/2017	TAD	Receipt and review of response to discovery from City employee. FOR CURRENT SERVICES RENDERED	$\frac{0.10}{2.60}$	507.00
		RECAPITULATION  KEEPER EY A. DECARLO  RECAPITULATION  HOURS HOURLY RATE  2.60 \$195.00	<u>TOTAL</u> \$507.00	
		TOTAL CURRENT WORK		507.00

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425 04/04/2017 ACCOUNT NO: 306-9905111 STATEMENT NO: 14782

Page: 1

Attn: Lynn Swanson

adv. Goldman, Barry (bike/grate accident)

Billing Category: 18-RLO Claim #001470-000373-GB-01

		HOURS
03/01/2017 TAE	Extended telephone conference with trial witness and prepare correspondence re: same. Attend site visit re: conditions and issues for trial. Prepare draft of summation for trial.	3.60
03/02/2017 TAE	Receipt and review of correspondence from plaintiff re: trial issues and prepare response to same. Receipt of proposed pre-trial stipulation and prepare revisions to same. Prepare proposed order on City's motion in limine. Telephone conference with trial exhibit firm re: information needed for trial exhibits. Review case law regarding case issues and revise jury instructions to include instructions on affirmative defenses. Telephone conference with judicial assistant re: courtroom equipment and status on docket.	5.60
03/03/2017 TAE	Receipt and review of correspondence from plaintiff re: deposition of Correa and prepare response to same. Receipt of second correspondence from Plaintiff re: trial issues. Review deposition of City utility director and prepare outline of direct examination from trial. Review all exhibits and photographs re: exhibits for trial and for use with witnesses.	5.80
03/06/2017 TAE	Receipt and review correspondence from Groff re: meeting and survey information. Telephone conference with plaintiff counsel re: deposition of Correa. Continue preparation of trial direct of Groff. Extended second telephone conference with plaintiff counsel re: settlement.	3.80
03/07/2017 TAE	Receipt and review of case law from plaintiff re: Motions in Limine. Prepare for hearing on motions. Prepare proposed order on motion in limine re: medical chart and bills. Confer with judicial assistant re: trial setting. Review case law re: medical evidence for trial and conference with City re: trial.	3.50
03/08/2017 JAC		0.40
TAE	Receipt and review of plaintiffs response in opposition to motion in limine and review case law re: same. Revise jury instructions to include	
	information on defenses.	1.30

ACCOUNT NO: STATEMENT NO:

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			HOURS
03/09/2017	SCW TAD	Meeting with Tracey Decarlo. Review pleadings in preparation for trial. Attend hearing on motion in limine re: medical bills. Attend hearing on motion to allow deposition. Confer with plaintiff re: status of claims. Receipt of order on motion in limine. Attend site visit re: pictures and information on claims for trial.	0.40 5.50
03/10/2017	TAD	Meet with graphics company re: issues with trial exhibits. Revise cross of plaintiff to include additional information on claims.	1.40
03/11/2017	TAD	Continue preparation of trial outlines re: closing arguments. Review case law re: damage claims and proof for trial.	1.30
03/13/2017	TAD	Review trial exhibits and prepare witness folders for trial. Revise examination of Groff to include additional information.	1.80
03/14/2017	SCW TAD	Meeting with Tracey DeCarlo regarding trial preparation. Review law regarding instructions on statute. Prepare request for judicial notice of statute and review case law re: request. Prepare request for	0.50
		production at trial.	2.30
03/15/2017		Review medical records of plaintiff in preparation for trial-cross of plaintiff doctors.	1.20
	TAD	Prepare voir dire for trial. Review additional case law re: proposed jury instructions for presentation to court. Prepare direct of officer testimony for trial. Review case law re: motion in limine re: plaintiff expert and opinions of same for trial.	6.20
03/16/2017	TAD	Confer with utilities director re: information on claim. Confer with Officer Bryant re: trial. Confer with Officer Sohn re: trial. Prepare correspondence to dispatch witnesses re: trial issues. Prepare correspondence to police witnesses re: trial. Receipt of correspondence from City witnesses re: trial issues. Revise voir dire to include additional areas of inquiry. Receipt of correspondence from Plaintiff counsel re: settlement. Telephone conference with City re: settlement issues.	5.80
03/17/2017	TAD	Receipt and review of correspondence from City manager re: construction documents for trial. Revise opening and cross of plaintiff. Review case law re medical damages and testimony for arguments to court at trial.	4.80
03/18/2017	TAD	Revise summation for trial. Receipt of information from Groff and revise direct examination of same. Review trial exhibits from firm and prepare correspondence re: changes to same. Review web site information for information on plaintiff and drainage structure for trial.	3.40
03/19/2017	scw	Review medical records and file in preparation for trial-cross of plaintiff efforts (medical).	3.00
03/20/2017	TAD	Review deposition of plaintiff expert and prepare examination of same for trial. Review case law re similar accidents and failure to call witnesses. Review case law re objections to testimony of expert for trial. Revise direct examination of City witnesses to include additional information. Review	

ACCOUNT NO: STATEMENT NO:

Page: 3 04/04/2017 306-9905111 14782

			HOURS
		revised exhibits for trial and prepare correspondence to plaintiff counsel re: exhibit exchange.	5.40
03/21/2017	IR	Conference with TAD regarding trial preparation and directives for same; initial review of defense team's trial exhibits list; preparation of trial exhibits, following the order of Defendant's Witness and Exhibit List filed with the	
	IR	court on 10/25/16.  Meeting with SCW to discuss medical records [including missing records	5.20
	TAD	not received], in preparation for trial.  Telephone call to Officer Prince re: trail preparation and prepare correspondence to city re: same. Prepare correspondence to potential witnesses re: trail subpoenas. Prepare correspondence re: expert	0.20
		deposition and exhibits. Prepare draft of opening.	3.80
03/22/2017		Receipt of correspondence received from plaintiff office regarding additional medical records.  Research regarding issues for trial concerning medical/damage claims.	0.40 1.70
	IR	Telephone conference with opposing counsel's paralegal to obtain Radiology Physician Solutions of Florida, LLC records; receipt and review of same and prepared index for trial exhibit; continuation of preparation of trial exhibits for TAD exchange on March 27, 2017, in compliance with the	1.70
	TAD	Court's trial order.  Meet with Groff re: trial testimony. Visit site with witness re: trial preparation. Prepare correspondence to the City re: subpoenas for trial. Review subpoena to Prince and correspondence re: same. Revise cross examination of plaintiff. Review updated statutes from plaintiffs expert re:	3.70 4.80
03/23/2017	COM	trial testimony.	4.00
03/23/2017	IR	Continue research for trial, regarding damage issues. Continue trial preparation cross for plaintiff medical witnesses.  Finalized review and organization of trial exhibits for use at exhibit exchange on March 27, 2017; continuation of trial preparation and prepared additional photographs of Plaintiff, his bicycle, and multiple aerial photos of accident scene for use at trial; conferences with TAD regarding other trial	3.70
	TAD	preparation, projects and deadlines. Confer with IVR re: exhibits and trial preparation. Review testimony of plaintiffs expert and revise motion in limine re: same. Meet with Groff re:	6.40
		trial testimony.	5.30
03/24/2017	IR	Additional trial preparation and conferences regarding trial exhibit exchange meeting, scheduled for March 27, 2017; reviewed our motion in limine in preparation of trial; preparation of email to opposing counsel's paralegal to provide TAD with medical billing records on Monday, March 27, 2017 trial	
	SCW		6.30
	TAD	regarding plaintiff Borden Medical issues.  Attend deposition of plaintiff; expert for trial. Receipt of correspondence from plaintiff re: exhibit information. Receipt of correspondence from	3.50
		graphic company and review proposed demonstrative exhibit proofs.	6.30
03/25/2017	TAD	Revise direct examination re: information from deposition of expert and meeting with Groff. Continue preparation for opening and summation.	2.60

CITY OF BOYNTON BEACH

ACCOUNT NO: STATEMENT NO:

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			HOURS
03/27/2017	IR	Research regarding witness Stuart M. Hirsch DMD. Prepare witness questions for Plaintiff, Dr. Hirsch, Conference with TAD regarding trial exhibits exchange this date, pursuant to the Court's Order Setting JUry Trial and Directing Pre-trial and Mediation Procedures, entered on 10.4.16; continuation of trial preparation and update of Trial Notebook with Jury Instructions and Index revised; post exhibit exchange conference with TAD regarding CD of Plaintiff's Trial Exhibits and hard copies of Plaintiff's billing records with directives for additional trial preparation projects; initial review of Plaintiff's Trial Exhibit CD and prepared new lists of same and compared with Defendant's trial exhibits; prepared notes as it pertained Andres Correa initial report dated 6.21.16	1.70 4.70
	TAD	Attend meeting with plaintiff to exchange exhibits. Confer with plaintiff counsel re: settlement. Confer with City re: settlement offer.	3.60
03/28/2017	IR	Receipt, review and download of Andres Correa, P.E. deposition testimony from 3.24.17, along with review of the deposition exhibits; updated trial witness [Plaintiff's alleged expert] and trial exhibits lists utilizing Mr. Correa's updated records; continuation of review and comparison of Plaintiff's trial exhibits [both on CD and hard copies] TAD received at the parties' trial exhibit exchange on 3.27.17; telephone conferences with court reporters and videographers regarding the DVD of Mr. Correa's deposition from 3.24.17 [since we only received the written transcripts]; prepared memo to Team, to udpate that we will receive an email of the video today and the	
	JAC	actual DVD by March 29, 2017. telephone calls with Commissioner re: settlement offer and trial related	5.30
	TAD	issues Revise cross of plaintiff to include additional information on medical claims. Complete opening statement and review exhibits re: use of same at trial and marking issues. Extended telephone conference with City re: offer to settle. Telephone conference with Plaintiff re: settlement issues. Review	0.20
03/29/2017	IR TAD	Continuation of trial preparation; finalized review of Plaintiff's trial exhibits received at the exhibits exchange of March 27, 2017 and preparation of memoranda pertaining to documents that were cross-referenced with the City of Boynton Beaches' trial exhibits [Re:: discrepancies and potentially new documents from the Plaintiff that were not disclosed during the discovery phase of litigation]; conference with CD regarding the deposition of Alvin Olesh, Plaintiff's fact witness, disclosed on Plaintiff's First Supplemental Disclosure of Fact Witness, filed 2.9.17; Telephone call to plaintiff counsel re additional settlement offer. Confer with witness Father Florek re: trial testimony. Prepare memo and outline of	3.90 6.30
		questions re: same. Telephone conference with City re: offer. Review case law re: inference stacking re: motion in limine.	2.40
03/30/2017	SCW IR	Continue preparation for trial and prepare witness questions for plaintiff medical witnesses.  Telephone call to Judge Rowe's judicial assistant to ascertain where our trial is currently falls on April 3, 2017 trial docket and follow up conference with TAD regarding same; reviewed the Court's Order Setting Trial of 10.4.16 and telephone conference with deputy clerk of court regarding	3.30

ACCOUNT NO: STATEMENT NO:

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		pretrial exhibit marking, per Palm Beach Cou conference with firm administrator regarding specific 'pre-marking guidelines' supplies we	"Defendant" e	xhibit tags, and	HOURS	
	specific 'pre-marking guidelines' supplies we will need for use at trial; initial preparation of trial 'go boxes' for use at the courthouse; continuation of trial preparation, which included legal research retrieval pertaining to law in Defendant's Motion in Limine and other law cited in jury instructions and information in our Trial Binder, for use at trial;  TAD Receipt and review plaintiffs second supplemental witness list. Receipt of correspondence and additional exhibits from plaintiff. Prepare motion to strike supplemental witness list. Confer with JAC re: trial issues. Review information on damage witnesses for trial. Revise motion in limine to include additional arguments re: expert testimony.  JAC Assist with trial preparation and review opening; review pleadings and calls re: new settlement offer.			ntinuation of trial ing to law in structions and list. Receipt of pare motion to ssues. Review in limine to	6.60 3.50 1.60	
03/31/2017	IR	4.3.17; reviewed demonstrative evidence red 3.30.17 and retained original color copies to continuation of legal research on the City of E Limine as to Plaintiff's Expert Witness Andres	ntinuation of trial preparation, #3 on Judge Rowe's docket commencing .17; reviewed demonstrative evidence received from Trial Graphix on 0.17 and retained original color copies to put into evidence at trial; ntinuation of legal research on the City of Boynton Beaches' Motion in nine as to Plaintiff's Expert Witness Andres Correa; prepared additional ness files for use at trial, as Plaintiff attempts to add additional witnesses			
	SCW TAD	to their list.  Prepare witness folders, exhibits and cross folders, exhibits and cross folders, exhibits and cross folders, exhibits and cross folders.	•		6.70 2.70	
	IAD	form. Receipt of jury instructions and verdict		s and verdice	1.50	
		FOR CURRENT SERVICES RENDERED			174.90	30,507.50
	<b></b>	RECAPITUL		0.151.1/5.475	TOTAL	
		<u>KEEPER</u> S A. CHEROF	2.20	OURLY RATE \$195.00	<u>TOTAL</u> \$429.00	
		ID RIERA	51.40	125.00	6,425.00	
	_	EY A. DECARLO RI C. WALLEN	99.20 22.10	195.00 195.00	19,344.00 4,309.50	
		Color photocopies Photocopies TOTAL EXPENSES THRU 03/31/2017				27.65 1,403.85 1,431.50
02/23/2017 03/09/2017		Parking - TAD Parking - TAD				14.00 8.00 22.00
		Parking -				22.00
		TOTAL ADVANCES THRU 03/31/2017				22.00

CITY OF BOYNTON BEACH

ACCOUNT NO: 306-9905111 STATEMENT NO: 14782

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adv. Goldman, Barry (bike/grate accident)

TOTAL CURRENT WORK

31,961.00

BALANCE DUE

\$31,961.00

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

Page: 1 04/04/2017 306-9905114

ACCOUNT NO: STATEMENT NO: 14783

Attn: Lynn Swanson

adv. Braswell, Jeffrey (excessive force)

Billing Category 18-RLO Claim #001470-000378-PP-03

		Claim #00 147 0-00037 0-F T -03		
03/06/2017	TAD	Receipt of correspondence from outside counsel re: status of settlement.	HOURS	
00/00/2011	17.0	Prepare correspondence to Clty re: same. Telephone conference with outside counsel re: response to inquiry on settlement.	0.40	
03/07/2017	TAD	Prepare correspondence to city re: settlement questions and receipt of response to same.	0.30	
03/08/2017	TAD	Receipt and review of correspondence from the City re: settlement issues and receipt of correspondence from outside counsel re: same. Prepare correspondence re: same.	0.30	
03/10/2017	TAD	Receipt and review of correspondence from outside counsel re: settlement issues. Prepare response to same. Telephone conference with outside counsel re: settlement.  FOR CURRENT SERVICES RENDERED	$\frac{0.30}{1.30}$	253.50
		RECAPITULATION		
		KEEPERHOURSHOURLY RATEDEY A. DECARLO1.30\$195.00	<u>TOTAL</u> \$253.50	
		TOTAL CURRENT WORK		253.50
		BALANCE DUE		\$253.50

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

04/04/2017 ACCOUNT NO: 306-9905124 STATEMENT NO: 14784

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Attn: Lynn Swanson

Broberg, Leif Complaint (2015)

		Billing Category: 18-RLO Claim #001470-000390-EP-01				
03/16/2017	scw	Attend deposition of Leif Broberg; prepare of	outline of test	imony.	HOURS 10.30	
03/17/2017	JAC	attend Amy Broberg deposition and follow uissue; discuss with TD	ıp re: same; e	evaluate case	3.30	
		FOR CURRENT SERVICES RENDERED			13.60	2,652.00
		RECAPITU	ILATION			
		KEEPER	<u>HOURS</u>	HOURLY RATE	TOTAL	
		S A. CHEROF	3.30	\$195.00	\$643.50	
	SHAR	RI C. WALLEN	10.30	195.00	2,008.50	
		TOTAL CURRENT WORK				2,652.00
		BALANCE DUE				\$2,652.00

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

04/04/2017 ACCOUNT NO: STATEMENT NO:

306-9905132 14785

Page: 1

Attn: Lynn Swanson

adv. Wade, George (auto accident)

		Billing Category: 18-RLO Claim #001470-000380-AB-01				
					HOURS	
03/02/2017	TAD	Review deposition of the plaintiff re: in witness and exhibit lists for trial as red			1.30	
03/21/2017	TAD	Receipt of plaintiff disclosure of witne disclosures.  FOR CURRENT SERVICES RENDE	·	s re: trial	0.30 1.60	312.00
	TIME		APITULATION HOURS HOURL	Y RATE	TOTAL	0.2.00
		EY A. DECARLO		\$195.00	\$312.00	
		TOTAL CURRENT WORK				312.00
		BALANCE DUE				\$312.00

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO: 306-STATEMENT NO:

04/04/2017 306-9905171 14786

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Attn: Lynn Swanson

adv. Caliendo, Giovanni & Emily (code violation)

Billing Category: 18-RLO Claim #001470-000400-PI-01

		HOURS
TAD	Review motion to dismiss and case law and prepare correspondence to court re: hearing on same.	0.80
TAD	Receipt and review of order on discovery issues.	0.10
TAD	Receipt and review of order on Hart's motion to dismiss.	0.30
TAD	Receipt and review of correspondence from outside counsel re: motion to dismiss and order.	0.20
TAD	Review motion to dismiss and case law and prepare for hearing on same. Review plaintiff's case law and response re: hearing on City's motion to dismiss.	0.80
TAD	Receipt and review of correspondence from plaintiff re: motion to dismiss. Review trial court order re: motion and prepare proposed order on City's Motion to dismiss. Prepare correspondence to court re: same. Prepare correspondence to court re: order.	0.90
TAD	Receipt of correspondence from the plaintiff re: agreed order and prepare response to same. Prepare correspondence to the Court re proposed order.	0.20
TAD	Telephone conference with plaintiff counsel re: City's motion to dismiss. Receipt of correspondence from Hart re motion to dismiss and prepare response to same.	0.30
IR TAD	Conference with TAD regarding special set hearing this date, on Defendant's Motion to Dismiss Plaintiff's Amended Complaint with Prejudice [parties reached an agreement with an agreed order to be submitted to the court for approval]; telephone conference with Judge Hafele's judicial assistant regarding same and email sent to litigation team regarding updated status of today's hearing.  Telephone conference with plaintiff counsel re: City's motion to dismiss.	0.60
	TAD TAD TAD TAD IR	Court re: hearing on same.  TAD Receipt and review of order on discovery issues.  TAD Receipt and review of correspondence from outside counsel re: motion to dismiss and order.  TAD Review motion to dismiss and case law and prepare for hearing on same. Review plaintiff's case law and response re: hearing on City's motion to dismiss.  TAD Receipt and review of correspondence from plaintiff re: motion to dismiss.  Review trial court order re: motion and prepare proposed order on City's Motion to dismiss. Prepare correspondence to court re: same. Prepare correspondence to court re: order.  TAD Receipt of correspondence from the plaintiff re: agreed order and prepare response to same. Prepare correspondence to the Court re proposed order.  TAD Telephone conference with plaintiff counsel re: City's motion to dismiss. Receipt of correspondence from Hart re motion to dismiss and prepare response to same.  IR Conference with TAD regarding special set hearing this date, on Defendant's Motion to Dismiss Plaintiff's Amended Complaint with Prejudice [parties reached an agreement with an agreed order to be submitted to the court for approval]; telephone conference with Judge Hafele's judicial assistant regarding same and email sent to litigation team regarding updated status of today's hearing.

CITY OF BOYNTON BEACH

04/04/2017

ACCOUNT NO: 306-9905171 STATEMENT NO: 14786

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adv. Caliendo, Giovanni & Emily (code violation)

	HOURS	
Review order. Prepare correspondence to City re: status and order.	0.60	
FOR CURRENT SERVICES RENDERED	4.80	894.00

### RECAPITULATION

<u>IIMEKEEPER</u>	HOURS	HOURLY RATE	IOIAL
INGRID RIERA	0.60	\$125.00	\$75.00
TRACEY A. DECARLO	4.20	195.00	819.00

Color photocopies	19.60
Photocopies	52.50
TOTAL EXPENSES THRU 03/31/2017	72.10

TOTAL CURRENT WORK 966.10

**BALANCE DUE** \$966.10

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905177

STATEMENT NO:

14787

Attn: Lynn Swanson

Davila, Danielle (Police)

Billing Category: 18-RLO

		Claim #001470-000393-PP-01				
03/09/2017	TAD	Receipt and review of corresponder			HOURS	
		Review report and information from re: same.	City and prepare, resp	onse to adjuster	0.30	
		FOR CURRENT SERVICES REND	ERED		0.30	58.50
		RE <u>KEEPER</u> CEY A. DECARLO	CAPITULATION HOURS H 0.30	OURLY RATE \$195.00	<u>TOTAL</u> \$58.50	
		TOTAL CURRENT WORK				58.50
		BALANCE DUE				\$58.50

CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

04/04/2017 306-9905186 ACCOUNT NO: STATEMENT NO:

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14788

Attn: Lynn Swanson

adv. Shevlin, Patrick (false arrest)

Billing Category: 18-RLO Claim #001470-000395-PP-01

			HOURS
03/10/2017	TAD	Receipt and review of correspondence re: amendment of complaint. Review proposed amendment and case law. Prepare correspondence to city re: same.	0.60
03/14/2017	TAD	Receipt and review of correspondence from adjuster re: claim status and prepare response to same. Review amended complaint from plaintiff and prepare correspondence re: proposed changes.	0.90
03/15/2017	TAD	Telephone call to plaintiff counsel re: response to request for production.	0.20
03/17/2017	TAD	Receipt and review of correspondence from plaintiff re: order. Prepare draft order on City's motion to dismiss. Confer with judicial assistant re: hearing on motion to dismiss.	0.70
03/23/2017	TAD	Receipt of documents from City re: response to request for production.  Receipt of correspondence from plaintiff re: proposed amended complaint.  Prepare response to same.	0.90
03/27/2017	IR	Conference with TAD regarding directives to review CD of Officer Davis' personnel and Internal Affairs files, to be finalized by Tuesday end of business; initial review of CD pdf records and download same for use in discovery responses [and to confirm portions were redacted by the City of	
	TAD	Boynton Beach]. Receipt and review of second amended complaint. Revise proposed order	1.10
		on motion to dismiss. Prepare for hearing on motion to dismiss.	0.80
03/28/2017	IR	Finalized review and download of Officer Davis' personnel file and Internal Affairs file, for use in discovery; conference with TAD regarding same; initial preparation of discovery tracking chart, which includes file information sheet, for use in tracking the future status of discovery responses and	
		requests;	1.40
03/29/2017	TAD	Attend hearing on City's motion to dismiss. Confer with plaintiff re settlement issues.	2.80

ACCOUNT NO: 306-9905186 STATEMENT NO: 14788

04/04/2017

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adv. Shevlin, Patrick (false arrest)

					HOURS	
03/30/2017	TAD	Review plaintiffs claims and review case law affirmative defenses. FOR CURRENT SERVICES RENDERED	re: same fo	r answer and	1.30 10.70	1,911.50
	INGR	RECAPITUL <u>KEEPER</u> ID RIERA EY A. DECARLO		HOURLY RATE \$125.00 195.00	TOTAL \$312.50 1,599.00	
		Photocopies TOTAL EXPENSES THRU 03/31/2017				12.25 12.25
03/29/2017		Parking - TAD Parking -				5.00
		TOTAL ADVANCES THRU 03/31/2017				5.00
		TOTAL CURRENT WORK				1,928.75
		BALANCE DUE				\$1,928.75

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14789

04/04/2017

306-9905215

CITY OF BOYNTON BEACH

100 East Boynton Beach Boulevard

Boynton Beach FL 33425

ACCOUNT NO:

STATEMENT NO:

Attn: Lynn Swanson

adv. Honacher, Jack (Baker Act - Police)

		Billing Category: 18 - RLO		
03/27/2017	TAD	Receipt and review of amended complaint and summons from plair review claims file re: status of prior claims.	HOURS otiff and	
03/30/2017		Prepare motion to dismiss plaintiffs amended complaint. Review do status of filings. Prepare correspondence to the City re: complaint a motion.  FOR CURRENT SERVICES RENDERED  RECAPITULATION  KEEPER HOURS HOURLY FOR CEY A. DECARLO	1.20 1.50	292.50
		Photocopies TOTAL EXPENSES THRU 03/31/2017 TOTAL CURRENT WORK BALANCE DUE		1.40 1.40 293.90 \$293.90

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905216

STATEMENT NO:

14790

Attn: Lynn Swanson

adv. Ryan, Ronald (whistleblower PD)

Billing Category: 18 - RLO Claim #001470-000410-EP-01

		Ciaiiii #001470-000410-EP-01				
03/20/2017	TAD	Receipt and review of plaintiff's response to response to request for admissions. Receinterrogatories and review objections. Prep	pt of Plaintiff answ	vers to	HOURS	
		on objections.	are corresponden	100 To. Hodinig	0.50	
		FOR CURRENT SERVICES RENDERED			0.50	97.50
		RECAPITU	JLATION			
		<u>KEEPER</u> CEY A. DECARLO	HOURS HOU	<u>JRLY RATE</u> \$195.00	<u>TOTAL</u> \$97.50	
		TOTAL CURRENT WORK				97.50
		BALANCE DUE				\$97.50

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905218

STATEMENT NO:

14791

Attn: Lynn Swanson

adv. Estime, Robens (Police Deadly Force)

Billing Category: 18-RLO
Claim #001470-000411-PP-01

	Claim #001470-000411-PP-01				
03/07/2017 T	AD Receipt and review of corresponde claimant attorney.  FOR CURRENT SERVICES RENE	•	mation from	HOURS  0.20 0.20	39.00
	RE IMEKEEPER RACEY A. DECARLO	ECAPITULATION HOURS HOU 0.20	JRLY RATE \$195.00	TOTAL \$39.00	
	TOTAL CURRENT WORK				39.00
	BALANCE DUE				\$39.00

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905233

STATEMENT NO:

14792

Attn: Lynn Swanson

adv. Hill, Ashley (Police-excessive force)

Billing Category: 18 - RLO Claim #001470-000378-PP-02

		Claim #001470-000376-FF-02				
03/31/2017	TAD	Receipt and review od corresp complaint.	ondence re: complaint and re	ceipt of	HOURS 0.40	
		FOR CURRENT SERVICES R	ENDERED		0.40	78.00
		KEEPER CEY A. DECARLO	RECAPITULATION HOURS HO 0.40	<u>URLY RATE</u> \$195.00	<u>TOTAL</u> \$78.00	
		TOTAL CURRENT WORK				78.00
		BALANCE DUE				\$78.00

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905244

STATEMENT NO:

14793

Attn: Lynn Swanson

adv. Jenkins, Laquanda (Public Works)

Billing Category: 18-RLO

Claim #

00/47/0047	<b>T</b> 4 D	5			HOURS	
03/17/2017	TAD Receipt and review of correspondence re: claim letter and attachments from claimant.		achments	0.30		
03/28/2017	TAD	Extended telephone conference	with adjuster re: claim and sta	atus.	0.40	
		FOR CURRENT SERVICES RE	ENDERED		0.70	136.50
		<u>KEEPER</u> CEY A. DECARLO	RECAPITULATION  HOURS 0.70	RLY RATE \$195.00	<u>TOTAL</u> \$136.50	
		TOTAL CURRENT WORK				136.50
		BALANCE DUE				\$136.50

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CITY OF BOYNTON BEACH 100 East Boynton Beach Boulevard Boynton Beach FL 33425

ACCOUNT NO:

04/04/2017 306-9905256

STATEMENT NO:

14794

\$58.50

Attn: Lynn Swanson

adv. Basinski, Donna (MVA garbage truck)

**BALANCE DUE** 

Billing Category: 18 - RLO Claim #001470-000422-AB-02

03/07/2017	TAD Receipt and review of claim letter. Review of correspondence from	HOURS	
03/07/2017	same.	0.30	
	FOR CURRENT SERVICES RENDERED	0.30	58.50
	RECAPITULATION		
	TIMEKEEPER HOURS HOURLY F TRACEY A. DECARLO 0.30 \$19	RATE TOTAL 95.00 \$58.50	
	TOTAL CURRENT WORK		58.50