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Telephone (954) 771-4500

CITY OF BOYNTON BEACH  
100 E. Ocean Avenue  
Boynton Beach FL 33435

Attn: Lynn Swanson

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04/02/2021  
ACCOUNT NO: 306-9905029  
STATEMENT NO: 35373

adv. Ford, Sharron (negligence arrest)

Billing Category 18-RLO  
Claim #001470000245GB

			HOURS	
03/11/2021	GB	Telephone conference call with JAC regarding claim. Emails with Michael Burke regarding status of appeal. Reviewed filed in preparation for call with Karen Klein.	0.50	
03/12/2021	GB	Telephone conference call with Karen Klein from Tristar regarding case status.	0.20	
03/31/2021	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	0.90	168.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH	0.70	\$205.00	\$143.50
INGRID RIERA	0.20	125.00	25.00

TOTAL CURRENT WORK 168.50

BALANCE DUE \$168.50

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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04/02/2021  
ACCOUNT NO: 306-9905171  
STATEMENT NO: 35374

Attn: Lynn Swanson

adv. Caliendo, Giovanni & Emily (code violation)

Billing Category: 18-RLO  
Claim #001470000400PI

			HOURS
03/01/2021	IR	Receipt and review of email from litigation team, regarding trial order, regarding deadline dates and correlating ticklers thereto; reviewed deadline dates of ticklers;	0.80
03/02/2021	GB	Emails with opposing counsel regarding Plaintiffs' Motion to Compel discovery. Reviewed Motion and discovery responses from 2017 which are the subject matter of Plaintiffs' Motion to compel.	0.40
03/05/2021	JAC	Review revised trial order; miscellaneous review of case options	0.70
03/10/2021	GB	Telephone conference call with MDC and JAC regarding Motion for Summary Judgment.	0.30
03/11/2021	GB	Prepared for Motion for Summary Judgment hearing ,reviewing motion and reading case law in support. Prepared for call with Tristar.	0.50
03/12/2021	GB	Telephone conference call with Karen Klein from Tristar regarding case status.	0.20
03/15/2021	GB	Reviewed file to compile documents responsive to Plaintiff's outstanding request for production.	2.90
03/17/2021	GB	Reviewed file to compile documents responsive to Plaintiffs' Request for Production dated 5/17/17. Email to opposing counsel regarding responsive documents.	0.90
03/24/2021	GB	Reviewed cases cited in amended rule 1.510 for federal standard of Motion for Summary Judgment. Continued drafted supplemental to Motion for Summary Judgment.	1.20
03/26/2021	GB	Completed first draft of City's Notice of Supplemental Authority in Support of its Motion for Summary Judgment. Emails Notice to MDC and JAC for review and approval.	0.60
03/29/2021	GB	Email to JAC regarding City's Supplemental Authority in Support of Motion for Summary Judgment.	0.10

adv. Caliendo, Giovanni &amp; Emily (code violation)

			HOURS	
03/30/2021	GB	Finalized and filed Notice of Supplemental Authority to Motion for Summary Judgment.	0.30	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding trial order, Motion for Summary Judgment and mediation.	0.20	
	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	9.30	1,826.50

## RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
JAMES A. CHEROF	0.70	\$205.00	\$143.50
GAL BETESH	7.60	205.00	1,558.00
INGRID RIERA	1.00	125.00	125.00

TOTAL CURRENT WORK 1,826.50

BALANCE DUE \$1,826.50

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04/02/2021  
ACCOUNT NO: 306-9905190  
STATEMENT NO: 35375

Attn: Lynn Swanson

adv. Readon, Jayden, Estate of (police chase)

Billing Category: 18-RLO  
Claim #001470-000396-AB-01

			HOURS	
03/10/2021	GB	Drafted responses to Plaintiffs' Request for Production.	0.30	
03/11/2021	GB	Telephone conference call reviewed file and case law research to ascertain whether Motion for Summary Judgment should be filed in this matter in preparation for call with Tristar.	0.50	
03/12/2021	GB	Telephone conference call with City regarding Plaintiffs' Request for Production. Listened to dispatch audio provided by City in response to Plaintiffs' Request for Production. Telephone conference call with attorney Kaufer regarding discovery and strategy. Telephone conference call with Karen Klein from Tristar regarding case status.	2.50	
03/15/2021	GB	Telephone conference call with City regarding responses to Plaintiffs' discovery requests. Reviewed recording provided by City in response to Plaintiffs' Request for Production. Finalized, served and filed responses to Plaintiffs' discovery request. Emails with attorney Kaufer regarding Plaintiffs' request for production.	1.90	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding case status and strategy moving forward.	0.20	
	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	5.60	1,132.00

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH	5.40	\$205.00	\$1,107.00
INGRID RIERA	0.20	125.00	25.00

TOTAL CURRENT WORK 1,132.00

BALANCE DUE \$1,132.00

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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04/02/2021  
ACCOUNT NO: 306-9905216  
STATEMENT NO: 35376

Attn: Lynn Swanson

adv. Ryan, Ronald (whistleblower PD)

Billing Category: 18 - RLO  
Claim #001470000410EP

			HOURS
03/09/2021	IR	Receipt and review of Attorneys Subpoena Service, Inc.'s Return of Service, upon Anthony Magnanti; receipt and review of Plaintiff's Subpoena for Deposition of Anthony Magnanti; and the Court's Order on Plaintiff's Motion for Order to Compel Anthony Magnanti to Appear at Deposition; preparation of updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart, noting new discovery dates, along with preparation to assist with upcoming depositions;	1.30
03/11/2021	GB	Reviewed file in preparation for call with Karen Klein.	0.50
03/12/2021	GB	Finalized responses to Plaintiff's Request for Production and filed. Telephone conference call with Karen Klein from Tristar regarding case status.	0.60
	IR	Receipt and review of Trial Order; initial preparation of the City of Boynton Beach's Trial Order Outline; retrieval of online court docket and reviewed recently filed discovery; preparation of updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart;	2.40
03/15/2021	IR	Receipt and review of Plaintiff's Motion to Compel the City's Responses to discovery requests; receipt and review the City's discovery responses thereto; receipt and review of Order on Plaintiff's Motion to Compel Responses to Second Request for Production; finalized the City of Boynton Beach's Trial Order Outline for internal use of trial deadlines; preparation of email to litigation team; retrieved Palm Beach Circuit Court online court docket, to review all written discovery filed by the parties; preparation of additional updates to the City's Trial Witness and Subpoena Duces Tecum tracking chart;	2.60
03/17/2021	GB	Telephone conference call with T Magnanti regarding upcoming deposition. Telephone conference call with JAC regarding upcoming depositions. Emails with opposing counsel confirming depositions and obtaining zoom information. Forwarded zoom information to deponent.	1.10
03/18/2021	IR	Review Notice of Taking Deposition of Jeffrey Katz; prepared tickler to assist with the preparation of this deposition; preparation of updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart; retrieved Palm Beach County online court docket, to review	

adv. Ryan, Ronald (whistleblower PD)

			HOURS	
		discovery requests and responses;	2.30	
03/19/2021	GB	Prepared for Magnanti's depositions by reviewing file and allegations against him.	2.80	
03/22/2021	GB	Email with opposing counsel regarding Katz's deposition and request for production. Telephone conference call with JAC regarding discovery. Email to deponent with zoom information.	0.40	
03/23/2021	GB	Prepared for Magnanti's deposition. Reviewed Ryan's deposition transcripts and noted allegations against Magnanti in preparation for Magnanti's deposition. Telephone conversation with Anthony Manganti regarding deposition. Telephone conference call with Jeffery Katz regarding deposition. Emails with opposing counsel regarding depositions of Magnanti and Katz.	5.20	
	IR	Review deposition transcripts from Boynton Beach Police Department Law Enforcement officers, and prepared updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart;	1.20	
	GB	Prepared for Motion for Summary Judgment hearing, reviewed case law cited in Motion and began drafting outline for hearing.	0.90	
	JAC	Review case status and issues regarding discovery; miscellaneous prep regarding deposition schedule; review case with GB	1.00	
03/24/2021	IR	Receipt and review of email from GB, with police dispatch audio files;	0.70	
	GB	Prepared for and attended Magnanti's deposition. Telephone conference call with Magnanti regarding deposition. Legal research regarding whether objections to request for production are waived if not timely waived.	4.60	
03/25/2021	GB	Reviewed filed for documents relevant to Katz's deposition in preparation for his deposition.	1.20	
03/26/2021	GB	Prepared for Jeffery Katz's deposition. Telephone conference call with deponent regarding deposition.	3.00	
	IR	Receipt and review of email regarding Jeffrey Katz deposition; updated additional information on the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum Chart;	0.20	
03/29/2021	GB	Prepared and attended Jeffery Katz's deposition.	2.70	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding case status and strategy moving forward.	0.20	
	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	35.10	6,323.50

## RECAPITULATION

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
JAMES A. CHEROF	1.00	\$205.00	\$205.00
GAL BETESH	23.20	205.00	4,756.00
INGRID RIERA	10.90	125.00	1,362.50

CITY OF BOYNTON BEACH

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04/02/2021  
ACCOUNT NO: 306-9905216  
STATEMENT NO: 35376

adv. Ryan, Ronald (whistleblower PD)

TOTAL EXPENSES THRU 03/31/2021	18.55
TOTAL CURRENT WORK	6,342.05
BALANCE DUE	<u>\$6,342.05</u>

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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Page: 1  
04/02/2021  
ACCOUNT NO: 306-9905336  
STATEMENT NO: 35377

Attn: Lynn Swanson

adv. Wright, Bernard (discrimination)

Billing Category: 18 - RLO  
Claim #001470000449EO

			HOURS	
03/11/2021	GB	Reviewed file in preparation for call with Karen Klein.	0.50	
03/12/2021	GB	Telephone conference call with Karen Klein from Tristar regarding status update.	0.20	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding status and strategy.	0.20	
	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	1.10	209.50

RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH	0.90	\$205.00	\$184.50
INGRID RIERA	0.20	125.00	25.00

TOTAL CURRENT WORK 209.50

BALANCE DUE \$209.50

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Page: 1  
04/02/2021  
ACCOUNT NO: 306-9905344  
STATEMENT NO: 35378

Attn: Lynn Swanson

Brescia, Brandon (EEOC Complaint)

Billing Category: 18 - RLO  
Claim #001470000450EP

			HOURS
03/01/2021	GB	Email to City and Tristar forwarding Notice of Dismissal with Prejudice.	0.10
	IR	Receipt and review of tickler to retrieve Palm Beach County Court docket, on status of litigation;	0.10
03/02/2021	IR	Receipt and review of Notice of Voluntary Dismissal, closed paralegal ticklers and any pending, trial deadlines;	0.30
03/04/2021	GB	Email to City and Tristar regarding Order Dismissing case with prejudice.	0.10
03/18/2021	IR	Receipt and review of the Palm Beach County Court Online Docket Clerk email; receipt and view of Agreed Order on Approving Joint Stipulation for Dismissal With Prejudice;	0.30
		FOR CURRENT SERVICES RENDERED	0.90
			128.50

	RECAPITULATION		
<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH	0.20	\$205.00	\$41.00
INGRID RIERA	0.70	125.00	87.50

TOTAL CURRENT WORK 128.50

BALANCE DUE \$128.50

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CITY OF BOYNTON BEACH  
100 E. Ocean Avenue  
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Page: 1  
04/02/2021  
ACCOUNT NO: 306-9905360  
STATEMENT NO: 35379

Attn: Lynn Swanson

adv. Cain, Courtney

Billing Category: 18 - RLO  
Claim #001470001005EP

			HOURS	
03/10/2021	GB	Telephone conference call with MDC and JAC regarding case status and discovery.	0.30	
03/11/2021	GB	Reviewed file in preparation for call with Karen Klein.	0.50	
03/12/2021	GB	Telephone conference call with Karen Klein from Tristar regarding case status.	0.20	
03/31/2021	GB	Telephone conference call with MDC, JAC and IVR regarding case status and strategy moving forward.	0.20	
	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	1.40	271.00

	RECAPITULATION	
<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
GAL BETESH	1.20	\$205.00
INGRID RIERA	0.20	125.00
		25.00

TOTAL CURRENT WORK 271.00

BALANCE DUE \$271.00

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04/02/2021  
ACCOUNT NO: 306-9905369  
STATEMENT NO: 35380

Attn: Lynn Swanson

adv. Moyse, Roseline (RLO)

Billing Category: 18 - RLO  
Claim #19754303

			HOURS	
03/18/2021	IR	Receipt and review of Notice of Taking Deposition of Lawrence Allen; preparation of updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart, accordingly;	0.70	
03/19/2021	IR	Receipt and review of Plaintiff's Notice of Cancellation of Deposition of Lawrence Allen; prepared updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum Tracking chart;	0.30	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding case status and strategy moving forward.	0.20	
		FOR CURRENT SERVICES RENDERED	1.20	166.00

RECAPITULATION			
<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH	0.20	\$205.00	\$41.00
INGRID RIERA	1.00	125.00	125.00

TOTAL CURRENT WORK 166.00

BALANCE DUE \$166.00

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CITY OF BOYNTON BEACH  
100 E. Ocean Avenue  
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Attn: Lynn Swanson

Page: 1  
04/02/2021  
ACCOUNT NO: 306-9905370  
STATEMENT NO: 35381

adv. Moyse, Rosie (Discrimination Complaint)

Billing Category: 18 - RLO  
Claim #

			HOURS	
03/11/2021	GB	Reviewed file in preparation for call with Karen Klein.	0.50	
03/12/2021	GB	Telephone conference call with Karen Klein from Tristar regarding case status.	0.20	
03/17/2021	GB	Emails with opposing counsel regarding upcoming deposition of Lawrence Allen. Email to City advising the deposition is canceled.	0.20	
03/26/2021	GB	Email to City regarding re-notice of Lawrence Allen's deposition.	0.10	
		FOR CURRENT SERVICES RENDERED	1.00	205.00

		RECAPITULATION		
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH		1.00	\$205.00	\$205.00

TOTAL CURRENT WORK 205.00

BALANCE DUE \$205.00

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Page: 1  
04/02/2021  
ACCOUNT NO: 306-9905375  
STATEMENT NO: 35382

Attn: Lynn Swanson

adv. Geraci, Sanford and Meredith Geraci, John  
(Confrontation/Police Officer)

Billing Category: 18 - RLO  
Claim #19757010

			HOURS	
01/06/2021	GB	Telephone conference call with TAD regarding case update.	0.10	
		FOR CURRENT SERVICES RENDERED	0.10	20.50
		RECAPITULATION		
	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
	GAL BETESH	0.10	\$205.00	\$20.50
	TOTAL CURRENT WORK			20.50
	BALANCE DUE			<u>\$20.50</u>

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Page: 1  
04/02/2021  
ACCOUNT NO: 306-9905421  
STATEMENT NO: 35383

Attn: Lynn Swanson

adv. McFadden, Patrick (K9 Injuries)

Billing Category: 18 - RLO  
Claim #19779868

			HOURS
03/01/2021	GB	Telephone conference call with Dr. Garrod's officer regarding IME rescheduled. Telephone conference call and emails with opposing counsel regarding stipulation and rescheduling IME.	0.70
	IR	Receipt and review of emails between K9 expert Michael Pennington and Officer Sohn's counsel; review email regarding expert witness pre-report conference call;	1.80
03/03/2021	GB	Telephone conference call with City for deposition preparation. Attended deposition of Officer Shepaum. Telephone conference call with attorney Kaufer regarding witnesses and strategy moving forward.	1.60
03/04/2021	IR	Preparation of email to GB regarding Compulsory Medical Examination of Plaintiff, Patrick McFadden; telephone conference with GB regarding same, with new date of the CME; preparation of ticklers to contact Dr. Garrod's office on date of CME, to ensure Plaintiff appears for CME; review pleadings and status of pending discovery, including Defendant, Mark Sohn's subpoenas duces tecum for records due;	1.60
	GB	Emails with attorney Kaufer regarding k9 expert.	0.20
	GB	Telephone conference call with SMS regarding transferring title in vehicles. Telephone conference call with MDC regarding transferring title in vehicles and scrivener's error in final judgment. Edits to final judgment and submitted to the Judge for signature.	0.90
03/05/2021	GB	Telephone conference calls with attorney Kaufer regarding k9 expert. Telephone conference call with with attorney Kaufer and K9 expert.	2.00
03/08/2021	GB	Reviewed and made edits to witness list. Emails with IVR and Officer Sohn's attorney regarding fact witness list. Finalized and served fact witness list.	0.60
	IR	Receipt and review of email from GB regarding Co-Defendant, Mark Sohn's Witness List; reviewed Sohn's Witness list and Compared with the City of Boynton Beach and compared with the City's Trial Witnesses; initial draft of the City of Boynton Beach's Witness list; preparation of ticklers to receive Plaintiff's witness & expert disclosures; receipt and review of emails between counsel, that Expert Wit. Disclosure Reports due; revised ticklers regarding deadline for defense expert disclosures and reports;	2.80

adv. McFadden, Patrick (K9 Injuries)

			HOURS
03/12/2021	GB	Email to Plaintiffs' counsel regarding Plaintiff's fact witness list. Telephone conference call with Dr. Garrod's officer confirming the Plaintiff attended his IME. Email to attorney for Sohn regarding IME.	0.50
	IR	Receipt and review of emails between counsel for the City of Boynton Beach as well as counsel for Boynton Beach Police Officer Mark Sohn, regarding pretrial requirements filed by both parties; receipt and review of email from GB regarding Plaintiff's Compulsory Medical Examination [CME];	1.20
	GB	Email to attorney Kaufer regarding Plaintiff's fact witness list.	0.10
03/22/2021	GB	Emails with attorney for Sohn regarding Rule 26 experts. Emails with Dr. Garrod regarding IME. Reviewed rule 26 drafts by Garrod and Pennington. Telephone conference call with Detective Whitefield regarding facts. Telephone conference call with k9 expert regarding opinion. Telephone conference call with attorney for Sohn regarding upcoming deadlines.	2.30
	IR	Receipt and review of email from GB, forwarding co-defense counsel's K9 Expert Report, prepared by Michael [Mike] Pennington; receipt and review of Kenneth Garrod's March 15, 2021 CME Written Report; preparation of email to GB regarding both reports, to be submitted as jointly utilized expert witnesses;	0.80
03/23/2021	IR	Receipt and review of email from GB regarding discovery from counsel for Mark Sohn's defense attorneys; preparation of email to Roberts Reynolds law firm, requesting copies of subpoena duces tecum records, following Sohn's Notice of Production from Non-Parties, and the City's Second Request for Copies; preparation of tickler to receive the sets of documents from co-defendant; preparation of updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum Tracking Chart;	1.40
	GB	Telephone conference call with Plaintiff's counsel regarding expert disclosures.	0.20
03/25/2021	GB	Prepared and participated in telephone conference call with Dr. Garrod regarding IME. Email to Dr. Garrod's office regarding IME. Emails with opposing counsel regarding mediation. Email to the City regarding mediation.	0.90
03/26/2021	GB	Reviewed expert reports from doctor and k9 expert. Email to City regarding mediation. Emails with IVR regarding expert disclosures. Reviewed expert disclosures drafted by IVR and edits to same. Legal research regarding requirements for expert disclosures. Telephone conference call with deponent in preparation for deposition.	1.70
	IR	Receipt and review of emails regarding Mediation; updated trial deadline tracking chart; receipt and review of email from GB, with directive to prepare the City of Boynton Beach's Expert Witness Disclosure; preparation of the City's Expert Witness Disclosure;	2.80
03/29/2021	GB	Edits to expert witness disclosures. Emails to Sohn's attorneys regarding mediation and expert disclosures. Finalized expert disclosures and had same served on all parties.	1.10
03/30/2021	GB	Telephone conference call with attorney Kaufer regarding Rule 26 expert disclosures. Emails with Dr. Garrod's officer regarding information in expert disclosures. Reviewed and made notes of Plaintiff's expert report in preparation for his deposition.	2.10

adv. McFadden, Patrick (K9 Injuries)

			HOURS	
03/31/2021	IR	Receipt and review of emails between GB and Stephanie Kaufer, Esq. at Roberts, Reynolds, et.al., counsel for Mark Sohn, regarding expert witnesses disclosures; receipt and review of finalized Expert Witness Disclosure from the City of Boynton Beach, with attachments thereto; receipt and review of Defendant, Mark Sohn's Expert Witness Disclosure, along with attachments pertaining to defense experts' respective reports, credentials and testimony experience, following federal rules; prepared updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum Tracking Chart; conference call with JAC, MDC & GB regarding case status and projects;	1.20	
	GB	Telephone conference call with JAC, MDC and IVR regarding case status and strategy moving forward.	0.20	
		FOR CURRENT SERVICES RENDERED	28.70	4,795.50

## RECAPITULATION

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH	15.10	\$205.00	\$3,095.50
INGRID RIERA	13.60	125.00	1,700.00

Photocopies	43.05
TOTAL EXPENSES THRU 03/31/2021	43.05

03/22/2021	Kenneth J. Garrod, M.D. - Professional Services	400.00
		400.00
02/19/2021	Federal Express - Invoice 7-292-70746	11.93
		11.93
	TOTAL ADVANCES THRU 03/31/2021	411.93
	TOTAL CURRENT WORK	5,250.48
	BALANCE DUE	<u>\$5,250.48</u>

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE



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CITY OF BOYNTON BEACH  
100 E. Ocean Avenue  
Boynton Beach FL 33435

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04/02/2021  
ACCOUNT NO: 306-9905422  
STATEMENT NO: 35384

Attn: Lynn Swanson

adv. Veillard, Larshmie (Motor Vehicle Accident)

Billing Category: 18 - RLO  
Claim #19773447

			HOURS	
03/02/2021	GB	Email to Tristar regard settlement check and dismissal of the lawsuit.	0.10	
03/25/2021	GB	Email to City and Tristar regarding dismissal of lawsuit.	0.10	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding case status.	0.20	
	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	0.60	107.00

	RECAPITULATION	
<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>
GAL BETESH	0.40	\$205.00
INGRID RIERA	0.20	125.00
		25.00

TOTAL CURRENT WORK 107.00

BALANCE DUE \$107.00

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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04/02/2021  
ACCOUNT NO: 306-9905423  
STATEMENT NO: 35385

Attn: Lynn Swanson

adv Mata Chorwadi Inc - Homing Inn Federal Lawsuit

Billing Category: 18 - RLO  
Claim #19780873

			HOURS	
03/03/2021	GB	Emails with MDC regarding transcript to Motion for Summary Judgment hearing.	0.10	
03/09/2021	GB	Drafted Response in Opposition to Plaintiffs' Brief in Opposition to Defendant's Motion to Tax Costs. Emails with MDC and JAC regarding Appellants' request for extension of time to file initial brief.	1.50	
	JAC	Review issues regarding status of appeal and request for extension of time; discuss with MC	0.40	
03/12/2021	IR	Receipt and review of Plaintiff's Brief in Opposition to the City of Boynton Beach's Motion to Tax Costs [DE 126]; receipt and review of the City of Boynton Beach's Response [DE 133] in Opposition Regarding Corrected Motion to Tax Costs, Verified Response in Opposition to Plaintiff's Brief in Opposition to Defendant's Motion to Tax Costs, filed on March 9, 2021, with replies due on March 16, 2021; preparation of tickler with court-ordered deadlines;	0.60	
03/15/2021	MDC	Review issues with briefing schedules.	0.20	
03/19/2021	JAC	Review appeal and miscellaneous requests for extension of time with Mike Cirullo; pleading review	0.80	
03/22/2021	MDC	Review Motion for Extension of Time.	0.20	
	JAC	Follow up regarding request for extension of appellate filing; discuss with MC	0.30	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding case status and strategy moving forward.	0.20	
	IR	Conference call with JAC, MDC & GB regarding case status and projects;	0.20	
		FOR CURRENT SERVICES RENDERED	4.50	858.50

RECAPITULATION

TIMEKEEPER	HOURS	HOURLY RATE	TOTAL
JAMES A. CHEROF	1.50	\$205.00	\$307.50
MICHAEL D. CIRULLO	0.40	205.00	82.00
GAL BETESH	1.80	205.00	369.00

CITY OF BOYNTON BEACH

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04/02/2021  
ACCOUNT NO: 306-9905423  
STATEMENT NO: 35385

adv Mata Chorwadi Inc - Homing Inn Federal Lawsuit

<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
INGRID RIERA	0.80	125.00	100.00

TOTAL CURRENT WORK	858.50
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BALANCE DUE	<u>\$858.50</u>
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AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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04/02/2021  
ACCOUNT NO: 306-9905462  
STATEMENT NO: 35386

Attn: Lynn Swanson

adv. Capobianco, Ewa (Charge of Discrimination)

Billing Category: 18 - RLO  
Claim #20806974

			HOURS	
03/10/2021	GB	Drafted deposition summary of Plaintiff's depositions. Drafted and filed notice of production of non party and drafted subpoena to Guardian Credit Union.	1.40	
03/11/2021	GB	Reviewed file in preparation for call with Karen Klein.	0.50	
03/12/2021	GB	Telephone conference call with Karen Klein from Tristar regarding case update.	0.20	
03/18/2021	GB	Continued drafting deposition summary of Plaintiff's deposition.	1.40	
03/26/2021	GB	Finalized subpoena and had same served on Guardian Credit Union.	0.30	
03/29/2021	GB	Read and summarized Plaintiff's deposition in preparation for drafting a Motion for Summary Judgment. Emails with the City regarding setting up conference with possible City witnesses. Telephone conference call with City regarding Plaintiff's termination.	2.40	
03/31/2021	GB	Telephone conference call with JAC, MDC and IVR regarding case status and strategy moving forward.	0.20	
		FOR CURRENT SERVICES RENDERED	6.40	1,312.00

	RECAPITULATION			
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH		6.40	\$205.00	\$1,312.00

TOTAL CURRENT WORK 1,312.00

BALANCE DUE \$1,312.00

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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04/02/2021  
ACCOUNT NO: 306-9905463  
STATEMENT NO: 35387

Attn: Lynn Swanson

adv. Russell, Frederick (MVA) (State Farm Subrogat  
Subrogation Claim)

Billing Category: 18 - RLO  
Claim #20807359

			HOURS	
03/15/2021	IR	Receipt and review of ticklers from initial receipt of new City of Boynton Beach, as a result from the vehicle accident; online search of court docket, to check Plaintiff's litigation involvement;	0.30	
		FOR CURRENT SERVICES RENDERED	0.30	37.50
RECAPITULATION				
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
INGRID RIERA		0.30	\$125.00	\$37.50
TOTAL CURRENT WORK				37.50
BALANCE DUE				<u>\$37.50</u>

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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CITY OF BOYNTON BEACH  
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Boynton Beach FL 33435

Attn: Lynn Swanson

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04/02/2021  
ACCOUNT NO: 306-9905480  
STATEMENT NO: 35388

adv. Bible Church of God (Property Damage/Fiber  
Optic Cable)

Billing Category: 18 - RLO  
Claim #19792048

			HOURS	
03/19/2021	GB	Telephone conference call with City regarding claim and how to move forward.	0.40	
03/31/2021	GB	Legal research regarding chapter 556 and obligation of calling 811. Reviewed documents received by 811 and email to City regarding findings.	1.70	
FOR CURRENT SERVICES RENDERED			2.10	430.50
RECAPITULATION				
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH		2.10	\$205.00	\$430.50
TOTAL CURRENT WORK				430.50
BALANCE DUE				<u>\$430.50</u>

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04/02/2021  
ACCOUNT NO: 306-9905511  
STATEMENT NO: 35389

Attn: Lynn Swanson

adv Ho, Wing K., Pro Se and Ho, Karen Yeh, Pro Se  
(Violation of Civil Rights)

Billing Category: 18 - RLO  
Claim #20825463

			HOURS		
03/09/2021	MDC	Review draft Motion to Strike; telephone conference with Heather Needelman.	0.30		
03/11/2021	GB	Telephone conference call with HN regarding status in preparation for call with Karen Klein. Reviewed file in preparation for call.	0.40		
03/12/2021	GB	Telephone conference call with Karen Klein from Tristar regarding case status.	0.20		
03/26/2021	MDC	Telephone call with HN on priority, proposed enforcement of unsafe structure order.	0.30		
		FOR CURRENT SERVICES RENDERED	1.20		246.00
RECAPITULATION					
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>	
MICHAEL D. CIRULLO		0.60	\$205.00	\$123.00	
GAL BETESH		0.60	205.00	123.00	
TOTAL CURRENT WORK					246.00
BALANCE DUE					<u>\$246.00</u>

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE

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04/02/2021  
ACCOUNT NO: 306-9905543  
STATEMENT NO: 35390

Attn: Lynn Swanson

adv. Schneider, Harry and Patti Schneider (MVA)

Billing Category: 18 - RLO  
Claim #21842585

			HOURS	
03/22/2021	IR	Receipt and review of email from City of Boynton Beach Risk Management of automobile accident; reviewed documents received from the City of Boynton Beach, regarding attorneys' requests from Harry and Patti Schneider, as well as from Liberty Mutual Insurance; preparation of updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart; online court docket search in Palm Beach County; reviewed two [2] traffic tickets issued to Harry Schneider on January 21, 2021 specifically related to this claim; prepared updates of online court findings to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart; updated Boynton Beach Work in Progress sheet, pertaining to same; retrieved, reviewed and saved Notice to Appear at Final Hearing, regarding two traffic tickets, from accident that resulted in this claim]; preparation of email to GB regarding criminal / traffic court final hearing and listed Boynton Beach officers, who may be witnesses for said automobile accident;	1.90	
	GB	Emails with IVR regarding status and upcoming traffic court hearing. Telephone conference call with City regarding file status.	0.30	
		FOR CURRENT SERVICES RENDERED	2.20	299.00
RECAPITULATION				
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH		0.30	\$205.00	\$61.50
INGRID RIERA		1.90	125.00	237.50
TOTAL CURRENT WORK				299.00
BALANCE DUE				<u>\$299.00</u>

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE



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Attn: Lynn Swanson

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04/02/2021  
ACCOUNT NO: 306-9905547  
STATEMENT NO: 35391

adv. Roman De Jesus, Sophia A.

Billing Category: 18 - RLO  
Claim #21841893

		HOURS		
03/03/2021	IR	Receipt and review of potential new matter and litigation from a moving vehicle accident; receipt and reviewed of materials that were attached to the City of Boynton Beach's initial email of notification of potential litigation; preparation of the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart, with case specific information noted, which includes medical information that employee was transferred to local hospital;		
			1.30	
		FOR CURRENT SERVICES RENDERED	1.30	162.50
RECAPITULATION				
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
INGRID RIERA		1.30	\$125.00	\$162.50
TOTAL CURRENT WORK				162.50
BALANCE DUE				<u>\$162.50</u>

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04/02/2021  
ACCOUNT NO: 306-9905549  
STATEMENT NO: 35392

Attn: Lynn Swanson

adv Federick, Carolyn

Billing Category: 18 - RLO  
Claim #

		HOURS	
03/03/2021	IR	Receipt and review of email from Lynn Swanson, Legal Department at the City of Boynton Beach pertaining to new personal injury claim; receipt and review of correspondence from Attorney Daniel Chehouri, Esq. at Morgan & Morgan plaintiff personal injury attorneys, ran name check on Carolyn Federick for previously filed claims against the City of Boynton Beach; initial preparation of new City of Boynton Beach Trial Witness and Subpoena Duces Tecum tracking chart;	1.30
		FOR CURRENT SERVICES RENDERED	1.30
			162.50
RECAPITULATION			
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>
INGRID RIERA		1.30	\$125.00
			\$162.50
		TOTAL CURRENT WORK	162.50
		BALANCE DUE	\$162.50

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04/02/2021  
ACCOUNT NO: 306-9905553  
STATEMENT NO: 35393

Attn: Lynn Swanson

adv. Miley, Cynthia and McCormick, LaToya (MVA COBB Utility Vehicle #2150 jumped curb and hit parked car of Cynthia

Billing Category: 18 - RLO  
Claim #21844057

			HOURS
03/12/2021	GB	Telephone conference call with City regarding claim and Rimkus. Telephone conference call with JAC regarding claim and Rimkus. Telephone conference call with Allen Rauch of Tristar regarding claim. Telephone conference call and emails with Rimkus.	1.10
03/15/2021	IR	Receipt and review of Richard Ignoffo, Risk Management Department of the City of Boynton Beach, enclosing additional materials regarding this new litigation; preparation of updates to the City of Boynton Beach's Trial Witness and Subpoena Duces Tecum tracking chart;	1.60
	GB	Emails with Tristar regarding claim and appraisals. Emails with the City regarding vehicles. Filled out forms for Rimkus. Emails with Rimkus regarding assignment. Telephone conference call with Tristar regarding appraisals of vehicles. Emails and telephone call with Gulf Atlantic Claims regarding appraisals.	1.60
03/17/2021	GB	Emails with Tristar regarding inspection and appraisal of City vehicles. Email to possible appraisal company. Telephone conference call with Jason Fox regarding appraisal of City vehicle. Telephone conference call with Tristar regarding appraisal of City vehicle. Telephone conference call regarding inspection of Nissan. Telephone conference call with Mr. Clinton regarding inspection of vehicle.	1.10
03/18/2021	GB	Telephone conference call with Robert Schwarzkopf from Rimkus Consultant Group re: inspection of city vehicle and accident site.	0.30
03/19/2021	GB	Telephone conference call with City regarding additional documents and information needed.	0.30
03/22/2021	GB	Emails with Tristar regarding appraisal. Emails with City requesting additional documents.	0.20
03/23/2021	GB	Reviewed documents regarding appraisals and evaluation of damages to Nissan and City vehicle. Email to tristar regarding documents.	0.60
03/25/2021	GB	Received and reviewed ring videos of incident. Reviewed pictures from police department of incident.	0.70

adv. Miley, Cynthia and McCormick, LaToya (MVA COBB Utility Vehicle #2150 jumped curb and hit parked car of Cynthia

FOR CURRENT SERVICES RENDERED		HOURS	
		7.50	1,409.50
RECAPITULATION			
<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
GAL BETESH	5.90	\$205.00	\$1,209.50
INGRID RIERA	1.60	125.00	200.00
TOTAL CURRENT WORK			1,409.50
BALANCE DUE			<u>\$1,409.50</u>

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Page: 1  
04/02/2021  
ACCOUNT NO: 306-9905554  
STATEMENT NO: 35394

Attn: Lynn Swanson

City Police Vehicle #3908 Loss Claim

Billing Category: 18 - RLO  
Claim #21845175

			HOURS	
03/25/2021	IR	Receipt and review of email from Richard Ignoffo, with the City of Boynton Beach, regarding potential new matter that involved a four vehicle accident; reviewed photographs received and Claim Loss form; prepared ticklers for follow up; prepared draft trial witness and subpoena duces tecum tracking chart, pending additional information, or notice from one of the parties involved of a potential litigation;	1.20	
		FOR CURRENT SERVICES RENDERED	1.20	150.00
RECAPITULATION				
<u>TIMEKEEPER</u>		<u>HOURS</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
INGRID RIERA		1.20	\$125.00	\$150.00
TOTAL CURRENT WORK				150.00
BALANCE DUE				<u>\$150.00</u>

AMOUNTS PREVIOUSLY BILLED NOT INCLUDED ABOVE