

ROBERTS, REYNOLDS, BEDARD & TUZZIO, PLLC

470 Columbia Drive, Suite C-101

West Palm Beach, Florida 33409

Telephone (561)688-6560

Tax ID No. 65-0004867

City of Boynton Beach
Attn: Karen Klein
P.O. Box 310
Boynton Beach, FL 33425-0310

April 26, 2021
Bill No. 57264

CLIENT: City of Boynton Beach
MATTER: McFadden v. CBB/Sohn

032
20469

Claim #N/A

BILL FOR FEES AND COSTS THROUGH 03/31/21

PROFESSIONAL SERVICES

Date	Services	Attorney	Hours
02/08/21	Communicate/With Client correspondence to Karen Klein re: summary of depositions of Officer Daryn Whitefield and Sergeant Jon Kautz.	SWK	0.90
02/26/21	Communicate/Other Counsel correspondence from Attorney Finney re: upcoming deposition of Officer Amanda Shepaum.	SWK	0.10
03/01/21	Correspondence to Mark Sohn re: deposition transcript of his testimony.	SWK	0.20
03/01/21	Preparation of Notice of Non-Objection to Subpoena to Non-Party directed to Bethesda Hospital East, Drug Abuse Foundation, Emerge Recovery Center, Electric Connection.	SWK	0.10
03/02/21	Correspondence to correspondence from Palm Beach County Sheriff's Office re: our public records request.	SWK	0.10
03/02/21	Draft/Revise detailed medical expenses chart and updated potential witness list based on billing records received from Phoenix MD and determined additional discovery needed.	JK	0.10
03/02/21	Draft/Revise detailed medical chronology chart and updated potential witness list based on records received from Lantana Police Department and determined additional discovery needed.	JK	0.70
03/02/21	Communicate/Other External telephone call with Palm Beach County Sheriff's Office re: Plaintiff's records pursuant to our subpoena.	JK	0.10
03/03/21	Correspondence to correspondence from Palm Beach County Sheriff's Office re: our public records request.	SWK	0.20
03/03/21	Correspondence to correspondence from Broward County Sheriff's Office re: our public records request.	SWK	0.20

PROFESSIONAL SERVICES

Date	Services	Attorney	Hours
03/05/21	Review/Analyze of relevant file materials to be sure all fact witnesses are listed for disclosure due March 8, 2021.	JK	1.10
03/08/21	Correspondence to and from State Attorney re: our public records request.	SWK	0.20
03/08/21	Receipt and review of Co-Defendant, City of Boynton Beach's Disclosure of Fact Witnesses	SWK	0.40
03/08/21	Correspondence to correspondences from Electric Connection re: our subpoena for records.	SWK	0.20
03/08/21	Draft/Revise Defendant, Mark Sohn's, Disclosure of Fact Witnesses.	SWK	0.40
03/09/21	Receipt and review of additional records from Broward County Sheriff's Office pursuant to our public records request.	SWK	0.30
03/11/21	Receipt and review of records from Electric Connection pursuant to our subpoena duces tecum.	SWK	0.30
03/11/21	Correspondence to and from Broward County Sheriff's Office re: our public records request.	SWK	0.10
03/11/21	Receipt and review of additional records from Broward County Sheriff's Office pursuant to our public records request.	SWK	0.30
03/11/21	Correspondence to correspondence from Gal Betesch re: Plaintiff did not send fact witness disclosures.	SWK	0.20
03/12/21	Correspondence to Gal Betesch re: Plaintiff's witness disclosures.	SWK	0.20
03/12/21	Correspondence to and from Gal Betesh re: Independent Medical Examination of Plaintiff.	SWK	0.20
03/12/21	Receipt and review of Plaintiff's Witness List.	SWK	0.30
03/12/21	Draft/Revise updated potential witness list based on information located in Plaintiff's Notice of Disclosure of Fact Witnesses.	JK	0.50
03/13/21	Receipt and review of additional records from Palm Beach County Sheriff's Office pursuant to our public records request.	SWK	0.40
03/15/21	Preparation of Correspondence to Karen Klein re: deposition summary of Officer Mark Sohn.	BLB	0.70
03/15/21	Correspondence to and from Palm Beach County Sheriff's Office re: our public records request.	SWK	0.20
03/16/21	Receipt and review of additional records from Palm Beach County Sheriff's Office pursuant to our public records request.	SWK	0.40
03/17/21	Review/Analyze Billing records from the Bethesda Hospital Inc. pursuant to our subpoena.	SAH	0.20
03/17/21	Receipt and review of Plaintiff's Amended Witness List.	SWK	0.30
03/18/21	Communicate/Other External telephone call with Mike Pennington of Storm Dog Tactical regarding addt'l records needed for review.	JK	0.10
03/19/21	Correspondence to Office of State Attorney re our public records request.	SWK	0.10

PROFESSIONAL SERVICES

Date	Services	Attorney	Hours
03/19/21	Correspondence to and from Office of State Attorney re some records destroyed.	SWK	0.10
03/19/21	Review/Analyze Billing records received from Bethesda Hospital East pursuant to our subpoena.	SWK	0.30
03/19/21	Review/Analyze records received from Phoenix emergency Medicine of Broward pursuant to our subpoena.	SWK	0.30
03/19/21	Correspondence to correspondence from our expert, Mike Pennington, re: proposed Rule 26 report.	SWK	0.20
03/22/21	Correspondence to correspondences to and from our expert, Mike Pennington, re: proposed Rule 26 report.	SWK	0.40
03/22/21	Correspondence to and from Gal Betesch re CME report on examination of Plaintiff from Dr. Garrod.	SWK	0.20
03/22/21	Communicate/Other External correspondence to bethesda hospital east re our subpoena for Patrick McFaddens's records.	SWK	0.20
03/22/21	Correspondence to our expert, Mike Pennington, re: deposition transcripts of Mark Sohn and Patrick McFadden.	SWK	0.20
03/22/21	Telephone conference with use of force expert, Pennington, and Gal Batesh, counsel for City re discussing his report and opinions.	SWK	0.90
03/22/21	Telephone conference with Gal Batesh re Pennington's report and opinions.	SWK	0.20
03/23/21	Receipt and review of deposition transcript of Officer Amanda Shepaum.	SWK	0.40
03/23/21	Correspondence to our expert Mike Pennington re: deposition transcripts of officers.	SWK	0.20
03/24/21	Preparation for telephone conference with expert, Dr. Garrod	AGB	0.50
03/24/21	Telephone conference with Mike Pennington re questions regarding taser policy and use of force continuum.	SWK	0.20
03/25/21	Review/Analyze correspondence from Ms. Casey re: Dr. Garrod's revised CME report regarding Mr. McFadden.	AGB	0.20
03/25/21	Review/Analyze correspondence to Ms. Betesh re: Dr. Garrod's revised CME report regarding Mr. McFadden	AGB	0.20
03/25/21	Appear For/Attend telephone conference with expert, Dr. Garrod, to discuss his opinions	AGB	0.30
03/26/21	Review/Analyze films received from Bethesda Hospital East pursuant to our subpoena.	SWK	0.20
03/26/21	Draft/Revise correspondence to Ms. Klein regarding the expert reports of Dr. Garrod and Mr. Pennington	AGB	0.20
03/26/21	Receipt and review of Dr. Kenneth Garrod's CME report on Plaintiff.	SWK	0.60
03/26/21	Correspondence to and from Gal Betesh re Dr. Garrod's report.	SWK	0.20
03/26/21	Receipt and review of our expert Mike Pennington's final report.	SWK	0.60

PROFESSIONAL SERVICES

Date	Services	Attorney	Hours
03/26/21	Correspondence to Officer Sohn re our expert, Mike Pennington's report including favorable opinion.	SWK	0.20
03/26/21	Preparation of Compliance with co-Defendant's requests for copies of records produced in response to our Notices of Production to Non-parties.	JK	0.20
03/27/21	Receipt and review of deposition transcript of Detective Danielle Whitefield..	SWK	0.40
03/27/21	Receipt and review of deposition transcript of Officer Daryn Whitefield..	SWK	0.40
03/27/21	Receipt and review of deposition transcript of Sergeant Jon Kautz.	SWK	0.30
03/27/21	Receipt and review of deposition transcript of Captain Michael Kelley.	SWK	0.30
03/28/21	Receipt and review of deposition transcript of Sergeant Daniel Dugger.	SWK	0.90
03/29/21	Communicate/Other External correspondence with Mike Pennington of Storm Dog Tactical re correct body cam footage for Officer Sohn.	JK	0.10
03/29/21	Receipt and review of City of Boynton Beach's Expert Witness List.	SWK	0.30
03/29/21	Correspondence to and from our expert, Mike Pennington, re: his report.	SWK	0.40
03/29/21	Receipt and review of Plaintiff's Expert Witness List.	SWK	0.30
03/29/21	Correspondence to multiple correspondences to and from Gal Betesh re experts.	SWK	0.40
03/29/21	Correspondence to and from Plaintiff's counsel re: Elkins list for our expert Mike Pennington.	SWK	0.20
03/29/21	Telephone conference with our expert, Mike Pennington re discussing plaintiff's expert and that we would like him to review plaintiff's expert's report.	SWK	0.20
03/30/21	Preparation of Compliance with Plaintiff's requests for copies of records produced in response to our Notices of Production to Non-parties.	JK	0.20
03/30/21	Communicate/Other External multiple correspondences to and from our expert Mike Pennington re Elkins list and Plaintiff's expert's reports.	SWK	0.40
03/30/21	Draft/Revise Defendant, Officer Mark Sohn's, Notice of Taking Video Conference Deposition of Taylor Jenkins.	AGB	0.10
03/30/21	Draft/Revise Defendant, Officer Mark Sohn's, Subpoena for Taking Video Conference Deposition of Taylor Jenkins.	AGB	0.10
03/30/21	Communicate/Other External correspondences to and from Plaintiff's counsel regarding expert Mike Pennington's list of prior testimony at depositions and trials.	JK	0.30

PROFESSIONAL SERVICES

Date	Services	Attorney	Hours
03/31/21	Receipt and review of Notice of Mediation.	BLB	0.10
03/31/21	Preparation of Correspondence to Karen Klein re: mediation.	BLB	0.30
03/31/21	Correspondence to Karen Klein re: Plaintiff's Expert Witness Disclosures and their reports.	SWK	0.20

PROFESSIONAL SERVICES SUMMARY

Code	Name	Hours	Rate	Amount
AGB	Ann G. Breeden, Associate	1.60	160.00	256.00
BLB	Benjamin L. Bedard, Partner	1.10	185.00	203.50
JK	Jaime Kehoe, Paralegal	3.40	110.00	374.00
SAH	Shelli A. Healy, Partner	0.20	185.00	37.00
SWK	Stephanie W. Kaufer, Partner	16.60	185.00	3,071.00
Total Professional Services		22.90		\$3,941.50

DISBURSEMENTS

Date	Description	Amount
03/05/21	Deposition Transcripts #120581478-Mark Sohn transcript - U.S. Legal Support, Inc.	373.60
03/12/21	Deposition Transcripts #120582250-Mark Sohn Videotaped deposition - U.S. Legal Support, Inc.	155.00
03/19/21	Outside Printing Invoice for film for Patrick McFadden per our subpoena. - Bethesda Hospital, Inc.	33.75
03/19/21	Outside Printing records from State Attorney's Office - Office of the State Attorney for the	165.71
Total Disbursements		\$728.06

CURRENT BILL TOTAL AMOUNT DUE	\$ 4,669.56
Balance Forward:	8,268.92
Payments & Adjustments:	-8,268.92
Total Due:	\$ 4,669.56

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to
Roberts, Reynolds, Bedard & Tuzzio, PLLC
470 Columbia Drive, Suite C-101
West Palm Beach, Florida 33409

Bill Number: 57264
Bill Date: April 26, 2021
Client Code: 032
Client Name: City of Boynton Beach
Matter Code: 20469
Matter Name: McFadden v. CBB/Sohn

Total Professional Services 3,941.50

Total Disbursements 728.06

CURRENT BILL TOTAL AMOUNT DUE **\$ 4,669.56**

Balance Forward: 8,268.92

Payments & Adjustments: -8,268.92

Total Due: **\$ 4,669.56**

Past Due Balance 0.00

TOTAL AMOUNT DUE **\$4,669.56**