

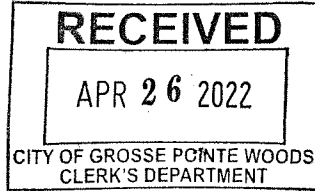
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Tax I.D. 38-3510534

GPW USSIC
Shawn Murphy, Treasurer
City of Grosse Pointe Woods
20025 Mack Plaza
Grosse Pointe Woods MI 48236

Page: 1
April 25, 2022
Claim No: JPJPC-20222Q
Statement No: 4

USSIC v City of Grosse Pointe Woods



For Professional Services through : 03/31/2022

					<u>Rate</u>	<u>Hours</u>	
03/01/2022	TAD	L510	A108	Communicate (other external) - E-mails (3) from and to Frank Schulte, City Administrator re: Closed Executive Meeting on 3/7/22 at the Grosse Pointe Woods Council Meeting - Eric Conn, New Partner at Jacobs and Diemer, to join Mr. Diemer at Meeting.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Debra Walling re: discussion of expected future costs at Closed Session on 3/7/22.	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise Coverage Analysis (continued).	285.00	1.50	427.50
03/03/2022	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Mr. Conn to prepare for Conference Call with USSIC's counsel.	285.00	0.30	85.50
	TAD	L510	A109	Appear for/attend Conference Call with Mr. Walton, counsel for USSIC re: payment of Defense Costs.	285.00	0.30	85.50
	EPC	L510	A109	Appear for/attend Conference Call with Mr. Walton, counsel for USSIC re: payment of Defense Costs.	285.00	0.30	85.50
	TAD	L510	A103	Draft/revise Coverage Analysis (continued).	285.00	3.40	969.00
03/04/2022	TAD	L510	A103	Draft/revise Coverage Analysis (continued).	285.00	4.60	1,311.00
	EPC	L510	A104	Review/analyze draft of the Coverage Analysis - Review information re: Reservation of Rights and updating Pollution Exclusion.	285.00	1.70	484.50
03/05/2022	TAD	L510	A102	Research re: Pollution Exclusion (Saturday work).	285.00	1.50	427.50
	TAD	L510	A103	Draft/revise Coverage Analysis (continued)			

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					<u>Rate</u>	<u>Hours</u>	
				(Saturday work).	285.00	3.80	1,083.00
03/06/2022	EPC	L510	A103	Draft/revise and finalize our Coverage Analysis (Sunday work).	285.00	2.40	684.00
	TAD	L510	A103	Draft/revise Coverage Analysis (continued) - Revise and edit version from Mr. Conn (Sunday work).	285.00	1.20	342.00
03/07/2022	TAD	L510	A103	Draft/revise Coverage Analysis (finalize) - E-mail to Debra Walling and City Council before tonight's Meeting / Closed Session.	285.00	3.30	940.50
	EPC	L510	A109	Appear for/attend Grosse Pointe Woods City Council Meeting / Closed Session re: legal strategy.	285.00	2.00	570.00
	TAD	L510	A109	Appear for/attend Grosse Pointe Woods City Council Meeting / Closed Session re: legal strategy.	285.00	2.00	570.00
03/09/2022	TAD	L510	A104	Review/analyze defective sewer lead information from Frank Schulte - Supportive of our position on Pollution Exclusion.	285.00	0.20	57.00
	TAD	L510	A104	Review/analyze Summons and Complaint filed in the Wayne Circuit Court which was served on the client today.	285.00	0.20	57.00
03/10/2022	TAD	L510	A108	Communicate (other external) - E-mail from Paul Antolin, Deputy City Clerk re: Summons and Complaint were personally served on Grosse Pointe Woods.	285.00	0.10	28.50
	EPC	L510	A103	Draft/revise Answer to Complaint (begun).	285.00	3.20	912.00
03/11/2022	EPC	L510	A103	Draft/revise Affirmative Defenses and Jury Demand.	285.00	1.40	399.00
	TAD	L510	A108	Communicate (other external) - Telephone call with Michael Costello (lengthy) re: meeting with Robert Bucko and alignment of interests between Grosse Pointe Woods and Grosse Pointe Park.	285.00	0.40	114.00
	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Jonathan Walton re: USSIC Letter detailing proposal on defense costs.	285.00	0.10	28.50
	TAD	L510	A104	Review/analyze Letter from USSIC re: payment of defense costs and clawback proposal.	285.00	0.40	114.00
	TAD	L510	A108	Communicate (other external) - E-mail to			

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					<u>Rate</u>	<u>Hours</u>	
				Defense Team with USSIC's proposal Letter - Letter is full of inaccuracies and we will provide a response.	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise response to USSIC's proposal Letter re: record correction and rejection of clawback proposal.	285.00	0.50	142.50
03/12/2022	TAD	L510	A103	Draft/revise Letter to Client with proposed response to USSIC's clawback proposal Letter (Saturday work).	285.00	0.30	85.50
03/14/2022	TAD	L510	A108	Communicate (other external) - E-mail to Paul Antolin, Deputy City Clerk re: Notice of Claim in Court of Claims.	285.00	0.10	28.50
03/21/2022	TAD	L510	A108	Communicate (other external) - E-mails (3) from and to Debra Walling, Susan Como, and Frank Schulte re: requested documents from Michigan Department of Insurance and Financial Services (DIFS).	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mails (5) to and from Debra Walling, Paul Antolin, and Frank Schulte re: notification of Court of Claims action to USSIC.	285.00	0.10	28.50
	TAD	L510	A104	Review/analyze Insurance Policy re: how to submit Notice of Claim.	285.00	0.20	57.00
	TAD	L510	A108	Communicate (other external) - Telephone call with Jennifer Grieco, local counsel for USSIC re: Notice of Subrogation case pending in Court of Claims.	285.00	0.20	57.00
03/22/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Jennifer Grieco, local counsel for USSIC re: contact for Notice of Claim.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mail from Paul Antolin to USSIC's Public Risk Claims with Notice of Claim re: <u>Selective Ins Co v State of MI.</u>	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - Telephone call with Jonathan Walton (lengthy) re: payment of Defense costs.	285.00	0.30	85.50
	TAD	L510	A103	Draft/revise Answer to Complaint, Affirmative Defenses, and Jury Demand (continued) - Draft for Defense Team review.	285.00	0.80	228.00
	TAD	L510	A103	Draft/revise Letters (2) to Defense Team with			

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					<u>Rate</u>	<u>Hours</u>	
				Status Updates (lengthy) re: responsive pleadings, Status Conference, Defense costs, unreasonableness of USSIC's demands.	285.00	0.80	228.00
03/23/2022	EPC	L510	A101	Plan and prepare for Court-ordered Status Conference Hearing.	285.00	0.50	142.50
	TAD	L510	A108	Communicate (other external) - E-mails (2) from Frank Schulte re: FEMA reimbursement status.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mails (9) from and to Defense Team re: responsive pleadings, premiums information from Mr. Bucko, and possible Counter-Claim for City's flood losses.	285.00	0.40	114.00
	TAD	L510	A108	Communicate (other external) - E-mail to Defense Team (lengthy) re: Affirmative Defense No. 16, Counter-Claim, coverage action attorney's fees, and potential for Grosse Pointe Park representation.	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise Answer to Complaint, Affirmative Defenses, and Jury Demand (finalize for filing) - E-file.	285.00	1.80	513.00
03/24/2022	EPC	L510	A109	Appear for/attend Status Conference with Judge Sullivan via Zoom.	285.00	0.70	199.50
	TAD	L510	A101	Plan and prepare for Status Conference - Analyze notes.	285.00	0.50	142.50
	TAD	L510	A109	Appear for/attend Status Conference with Judge Sullivan via Zoom.	285.00	0.70	199.50
	EPC	L510	A108	Communicate (other external) - Phone call with underlying counsel for class members re: damages rubric, coverage issues, and discovery.	285.00	0.20	57.00
	TAD	L510	A108	Communicate (other external) - Phone call with underlying counsel for class members re: damages rubric, coverage issues, and discovery.	285.00	0.20	57.00
	EPC	L510	A108	Communicate (other external) - Conference Call with counsel re: proposed Motion for Summary Disposition.	285.00	0.30	85.50
	TAD	L510	A108	Communicate (other external) - E-mails (3) to and from Defense Team re: outcome of Status Conference - USSIC's impending Motion for Summary Disposition.	285.00	0.20	57.00
	EPC	L510	A104	Review/analyze and revise proposed Order from			

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					<u>Rate</u>	<u>Hours</u>	
				Status Conference.	285.00	0.20	57.00
03/25/2022	EPC	L510	A104	Review/analyze claim material on thumb drive provided by City of Grosse Pointe Woods (begun) - Identify factual basis for defense under Pollution Exclusion.	285.00	3.60	1,026.00
	EPC	L510	A109	Appear for/attend Conference with Mr. Doherty, Mr. Desmond, and Mr. Diemer re: obtaining underlying discovery materials and coverage issues.	285.00	0.90	256.50
	TAD	L510	A109	Appear for/attend Conference with Mr. Doherty, Mr. Desmond, and Mr. Conn re: obtaining underlying discovery materials and coverage issues.	285.00	0.90	256.50
03/26/2022	TAD	L510	A104	Review/analyze underlying complaint re: combined sewer question from Judge Sullivan (Saturday work).	285.00	0.20	57.00
	TAD	L510	A103	Draft/revise Letter to Debra Walling re: results of discussions with class counsel, potential reassignment or consolidation of coverage cases (Saturday work).	285.00	1.00	285.00
	TAD	L510	A108	Communicate (other external) - E-mail to Mr. Doherty and Mr. Desmond, counsel in underlying cases re: coverage cases (Saturday work).	285.00	0.20	57.00
03/28/2022	EPC	L510	A102	Research Insurance Services Office information for Committee Notes on changes to standard form Pollution Exclusion.	285.00	0.70	199.50
	EPC	L510	A104	Review/analyze case law provided by counsel re: Pollution Exclusion.	285.00	0.60	171.00
	EPC	L510	A104	Review/analyze resident water damage claims (continued).	285.00	2.80	798.00
	TAD	L510	A102	Research re: change to ISO pollution language.	285.00	1.50	427.50
	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Paul Antolin re: Damage Assessment Form.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mail from Paul Antolin re: message from Christopher Leapley at Tokio Marine re: claim submission and Notice of Intent of <u>Selective Service</u> case.	285.00	0.10	28.50
03/29/2022	EPC	L510	A104	Review/analyze client file material (finalize) -			

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				<u>Rate</u>	<u>Hours</u>	
			Claims made to City of Grosse Pointe Woods.	285.00	2.40	684.00
	TAD	L510	A108 Communicate (other external) - Phone call with Ms. Shell, Coverage Counsel for Grosse Pointe Park re: Status Conference and defense strategy.	285.00	0.30	85.50
03/31/2022	EPC	L510	A108 Communicate (other external) - E-mails with DPS and National Express re: Answer and content of conversations with Counsel. For Current Services Rendered	285.00	0.20	57.00
					<u>59.60</u>	<u>16,986.00</u>

Expenses

03/23/2022		L510	E112 Court fees - Jury Demand in Wayne Circuit Court.			87.55
						<u>87.55</u>

Total Fees and Costs:

17,073.55

Previous Balance

\$11,799.00

Payments

03/31/2022			Payment [4/7/22] - CK#62979 - Thank you!			-11,799.00
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Balance Due

\$17,073.55

Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
57,256.50	87.55	0.00	40,270.50

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L510	Appellate Motions and Submissions	16986.00	87.55
L500	Appeal	<u>16,986.00</u>	<u>87.55</u>

Please Remit

\$17,073.55

592537812.000

Sm 4/25/2022

FS 4-26-22

AUTHORIZATION DATE
03-23-2022

BUNDLE #
3499349

CARDHOLDER NAME
TIMOTHY A DIEMER

FILER NAME
TIMOTHY DIEMER

RECEIPT #
082439760329

AUTHORIZATION CODE
513254

MATTER NUMBER
GPW

COURT	CASE NUMBER	CASE TITLE
MI Wayne 3rd Circuit Court	21-017575-CB	U.S. Specialty Insurance Company v City of Grosse Pointe Woods

PAYMENT ACCOUNT ID	PAYMENT ACCOUNT NUMBER	PAYMENT EXPIRATION DATE
c1a86756-4628-45c9-6064-08d755c1b6ed	XXXX-XXXX-XXXX-2815	03-31-2026

DOCUMENT TITLE	FILING TYPE	FILING FEE
Final Jury Demand 3.23.22	Jury Demand Filed & Fee Paid	\$85.00
	CREDIT CARD PROCESSING FEE	\$2.55
	TOTAL	\$87.55