

**JACOBS and DIEMER, P.C.**  
Attorneys and Counselors at Law  
The Guardian Building, Suite 2825  
500 Griswold Street  
Detroit, MI 48226-3480  
(313) 965-1900

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  
January 18, 2023  
Claim No: JPJPC-20222Q  
Statement No: 15

USSIC v City of Grosse Pointe Woods

**RECEIVED**

**JAN 19 2023**

CITY OF GROSSE POINTE WOODS  
CLERK'S DEPARTMENT

For Professional Services through : 12/31/2022

					<u>Rate</u>	<u>Hours</u>	
12/01/2022	SMM	L510	A103	Draft/revise, compile, and Bates stamp Notice of Claims and Damage Reports in preparation of producing to USSIC.	200.00	0.40	80.00
	SMM	L510	A103	Draft/revise Proof of Service for production of additional Discovery documents to USSIC.	200.00	0.10	20.00
	SMM	L510	A108	Communicate (other external) - E-mails (4) to S. Lockwood and F. Varicalli re: Deposition Notice and topics.	200.00	0.20	40.00
	SMM	L510	A104	Review/analyze CSO Permit from F. Schulte.	200.00	0.10	20.00
	SMM	L510	A108	Communicate (other external) - E-mails (2) to and from Jonathan Walton re: Document production.	200.00	0.10	20.00
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: retention of Expert Witnesses [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: retention of Expert Witnesses [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
	EPC	L510	A109	Appear for/attend Hearing on Motions to Quash Intervenors' Subpoenas and impromptu Status Conference [JOINT TASK FOR GPP/GPW].	142.50	1.40	199.50
	SMM	L510	A109	Appear for/attend Hearing on Motions to Quash Intervenors' Subpoenas and impromptu Status Conference [JOINT TASK FOR GPP/GPW].	100.00	1.40	140.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Ms. McLeod re: upcoming tasks and division of labor [JOINT TASK FOR GPP/GPW].	142.50	0.50	71.25

USSIC v City of Grosse Pointe Woods

				<u>Rate</u>	<u>Hours</u>		
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Ms. McLeod re: upcoming tasks and division of labor [JOINT TASK FOR GPP/GPW].	142.50	0.50	71.25
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Mr. Conn re: upcoming tasks and division of labor [JOINT TASK FOR GPP/GPW].	100.00	0.50	50.00
	EPC	L510	A109	Appear for/attend Conference Call with Tom McGraw re: Document productions and Discovery [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
	EPC	L510	A108	Communicate (other external) - E-mail to ESI re: pollution Expert [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
12/02/2022	EPC	L510	A104	Review/analyze and edit Stipulated Order re: Scheduling Order dates from Mr. Walton [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
	SMM	L510	A104	Review/analyze and edit draft Stipulated Order re: Scheduling Order dates [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
	EPC	L510	A108	Communicate (other external) - E-mails (2) to and from Paul Doherty and Jonathan Walton re: proposed Stipulated Order [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
	SMM	L510	A103	Draft/revise Memorandum to file re: summary of 12/1/22 Motion Hearing [JOINT TASK FOR GPP/GPW].	100.00	0.30	30.00
12/05/2022	TAD	L510	A109	Appear for/attend Conference Call with Ms. Walling, Mr. Schulte, and Mr. Antolin re: Discovery in the underlying case and Stay of Proceedings in the coverage litigation.	285.00	0.60	171.00
	EPC	L510	A109	Appear for/attend Conference Call with Ms. Walling, Mr. Schulte, and Mr. Antolin re: Discovery in the underlying case and Stay of Proceedings in the coverage litigation.	285.00	0.60	171.00
	SMM	L510	A109	Appear for/attend Conference Call with Ms. Walling, Mr. Schulte, and Mr. Antolin re: Discovery in the underlying case and Stay of Proceedings in the coverage litigation.	200.00	0.60	120.00
	SMM	L510	A108	Communicate (other external) - E-mails (2) to and from M. Abdallah re: entered Orders and additional Motions [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	SMM	L510	A104	Review/analyze proposed Order submitted by City			

USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
				of Detroit/DWSD re: Motion to Quash Intervenors' Subpoena [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	EPC	L510	A108	Communicate (other external) - E-mails (3) to and from ESi re: potential Expert [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
12/06/2022	TAD	L510	A108	Communicate (other external) - E-mail from Debra Walling re: Discovery Requests.	285.00	0.10	28.50
	EPC	L510	A108	Communicate (other external) - E-mails (3) to and from ESi re: potential Expert [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
	SMM	L510	A104	Review/analyze insurance coverage excerpts re: Pollution Exclusion and definition of pollutant in preparation of Conference Call with Ed Tuczak, potential Expert Witness [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
	EPC	L510	A109	Appear for/attend Conference Call with Ed Tuczak re: potential Expert Witness services [JOINT TASK FOR GPP/GPW].	142.50	0.40	57.00
	SMM	L510	A109	Appear for/attend Conference Call with Ed Tuczak re: potential Expert Witness services [JOINT TASK FOR GPP/GPW].	100.00	0.40	40.00
	EPC	L510	A108	Communicate (other external) - E-mail to Mr. Schulte and Ms. Walling re: Motion to Stay and Deposition preparation sessions.	285.00	0.10	28.50
12/07/2022	SMM	L510	A108	Communicate (other external) - E-mails (3) to and from M. Abdallah re: Detroit/DWSD's Order regarding Motion to Quash Intervenors' Subpoena [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	SMM	L510	A108	Communicate (other external) - E-mail from Mr. Tuczak, potential Expert re: follow-up telephone conference to discuss case [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	SMM	L510	A104	Review/analyze Stipulated Order Following Status Conference [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
12/08/2022	SMM	L510	A108	Communicate (other external) - E-mail to E. Tuczak re: follow-up telephone conference to discuss potential Expert Witness [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	SMM	L510	A104	Review/analyze entered Order regarding the City of Detroit and DWSD's Motion to Quash Intervenors'			

					<u>Rate</u>	<u>Hours</u>	
				Subpoena [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	SMM	L510	A108	Communicate (other external) - E-mail to M. Abdullah re: entered Order regarding the City of Detroit and DWSD's Motion to Quash Intervenors' Subpoena [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
12/09/2022	SMM	L510	A108	Communicate (other external) - E-mails (3) to and from E. Tuczak and B. Kenney re: follow-up telephone conference to discuss potential Expert Witness [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
12/12/2022	EPC	L510	A108	Communicate (other external) - E-mail from Jonathan Walton re: Discovery, Depositions, and Proposed Amended Complaint [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
12/13/2022	SMM	L510	A108	Communicate (other external) - E-mail from Frank Schulte re: Weather Expert.	200.00	0.10	20.00
	SMM	L510	A108	Communicate (other external) - E-mails (2) to and from Mr. Tuczak re: meeting to discussion potential Expert services [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	SMM	L510	A104	Review/analyze CVs of E. Tuczak and B. Kenney in preparation of meeting to discuss potential Expert services [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
12/15/2022	SMM	L510	A108	Communicate (other external) - E-mails (2) to and from E. Tuczak re: Conference Call to discuss potential Expert services [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	SMM	L510	A104	Review/analyze file materials in preparation of drafting Motion to Stay Proceedings [JOINT TASK FOR GPP/GPW].	100.00	0.50	50.00
	SMM	L510	A103	Draft/revise Motion to Stay Proceedings (begun) [JOINT TASK FOR GPP/GPW].	100.00	0.60	60.00
	SMM	L510	A108	Communicate (other external) - Telephone call with Judge Allen's Clerk re: next Motion Hearing date [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
12/20/2022	EPC	L510	A103	Draft/revise Motion to Stay Proceedings (continued) [JOINT TASK FOR GPP/GPW].	142.50	4.10	584.25
12/21/2022	EPC	L510	A103	Draft/revise Motion for Stay of Proceedings (continued) [JOINT TASK FOR GPP/GPW].	142.50	0.80	114.00
	SMM	L510	A102	Research re: Stay of Proceedings in dec action for purposes of Joint Motion for Stay of Proceedings			

## USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
				[JOINT TASK FOR GPP/GPW].	100.00	0.50	50.00
	SMM	L510	A103	Draft/revise Joint Motion for Stay of Proceedings (continued) [JOINT TASK FOR GPP/GPW].	100.00	1.70	170.00
12/22/2022	SMM	L510	A103	Draft/revise Correspondence to Jonathan Walton re: Grosse Pointe Woods Witnesses and topics for Depositions.	200.00	0.20	40.00
	EPC	L510	A108	Communicate (other external) - E-mails (2) to and from Mr. Walton re: Depositions and Motion for Stay [JOINT TASK FOR GPP/GPW].	285.00	0.10	28.50
12/23/2022	EPC	L510	A108	Communicate (other external) - E-mail from Mr. Schulte re: approval of Motion for Stay on behalf of Grosse Pointe Woods.	142.50	0.10	14.25
12/28/2022	TAD	L510	A104	Review/analyze USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	142.50	0.30	42.75
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Ms. McLeod re: strategy for Response to Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	142.50	0.40	57.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Ms. McLeod re: strategy for Response to Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	142.50	0.40	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Mr. Diemer re: strategy for Response to Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	100.00	0.40	40.00
	EPC	L510	A104	Review/analyze USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	142.50	0.60	85.50
	SMM	L510	A103	Draft/revise proposed Order to attach to Joint Motion for Stay [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
	SMM	L510	A104	Review/analyze USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	100.00	0.60	60.00
	TAD	L510	A108	Communicate (other external) - E-mail to Mr. Sizeland, Ms. Walling, and Mr. Schulte with USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
	EPC	L510	A108	Communicate (other external) - E-mail from Jonathan Walton re: denial of concurrence in Motion for Stay [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25

USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
12/29/2022	EPC	L510	A103	Draft/revise Motion to Stay (continued) - Include USSIC's Motion to Amend as reasoning [JOINT TASK FOR GPP/GPW].	142.50	1.70	242.25
	SMM	L510	A103	Draft/revise Joint Motion for Stay of Proceedings (continued) [JOINT TASK FOR GPP/GPW].	100.00	1.60	160.00
	SMM	L510	A103	Draft/revise and compile Exhibits to Joint Motion for Stay of Proceedings [JOINT TASK FOR GPP/GPW].	100.00	0.60	60.00
12/30/2022	EPC	L510	A103	Draft/revise Response to USSIC's Motion to Amend the Complaint (begun) [JOINT TASK FOR GPP/GPW].	142.50	1.60	228.00
	SMM	L510	A104	Review/analyze Exhibits attached to USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	100.00	0.40	40.00
	SMM	L510	A102	Research re: MCR 2.118(A)(2) in preparation of drafting portion of Response to USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
	SMM	L510	A102	Research re: exceptions to granting leave to amend in preparation of drafting portion of Response to USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	100.00	0.90	90.00
	SMM	L510	A103	Draft/revise portion of Response to USSIC's Motion to Amend the Complaint [JOINT TASK FOR GPP/GPW].	100.00	0.60	60.00
				For Current Services Rendered		<u>30.80</u>	<u>4,136.75</u>

**Expenses**

12/29/2022	L510	E112	Court fees - Fee for Motion for Stay.	20.60
12/31/2022	L510	E124	Other - Superior Investigative Services - Locate Robert Bucko for Subpoena service.	<u>1,000.45</u>
				1,021.05
			<b>Total Fees and Costs:</b>	5,157.80
			Previous Balance	\$14,525.75

**Payments**

12/22/2022			Payment - CK#65301 - Thank you!	-14,525.75
------------	--	--	---------------------------------	------------

GPW USSIC

USSIC v City of Grosse Pointe Woods

**Balance Due**

**\$5,157.80**

Billing History			
<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
123,527.00	1,944.21	0.00	120,313.41

**Task Code Summary**

		<u>Fees</u>	<u>Expenses</u>
L510	Appellate Motions and Submissions	4,136.75	1,021.05
L500	Appeal	4,136.75	1,021.05

Please Remit

**\$5,157.80**

592-536-812.000    \$5,157.80

SM 1/18/23  
FS 1-18-23

Final Statement Run Totals 01/18/2023

Statements Printed:	1
Hours:	30.80
Fees:	4,136.75
Expenses:	1,000.45
Advances:	20.60