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

Page: 1  
October 06, 2022  
Claim No: JPJPC-20222Q  
Statement No: 11

USSIC v City of Grosse Pointe Woods

**RECEIVED**

OCT 10 2022

CITY OF GROSSE POINTE WOODS  
CLERK'S DEPARTMENT

For Professional Services through : 09/30/2022

					<u>Rate</u>	<u>Hours</u>	
09/01/2022	TAD	L510	A109	Appear for/attend Conference Call with all Counsel in Coverage Case re: Witness List and Discovery issues.	285.00	0.30	85.50
	TAD	L510	A108	Communicate (other external) - E-mail to all Counsel in Coverage Case re: recap of outcome of Conference Call and plans going forward with regard to Discovery issues.	285.00	0.10	28.50
09/07/2022	EPC	L510	A108	Communicate (other external) - E-mail to Mr. Howlett re: Grosse Pointe Park's documents and potential invocation of privilege.	285.00	0.10	28.50
09/08/2022	EPC	L510	A108	Communicate (other external) - E-mails (3) to and from Jake Howlett re: status of Grosse Pointe Park's response regarding documents we need to produce.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - Telephone call with Ms. Walling (lengthy) re: Joint Defense Proposal.	285.00	0.50	142.50
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: document production and potential privilege issues.	285.00	1.00	285.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer re: document production and potential privilege issues.	285.00	1.00	285.00
	TAD	L510	A103	Draft/revise Letter to Defense Team re: Joint Defense Proposal - Considerations and procedure.	285.00	0.80	228.00
	EPC	L510	A104	Review/analyze, redact, and prepare client documents for production to USSIC in Response to Requests to Produce (3000+pages)(begun).	285.00	5.40	1,539.00
09/13/2022	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn			

## USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
				re: Plaintiff's Document Production and summarization of same.	200.00	0.20	40.00
	EPC	L510	A110	Manage data/files - Download and analyze portions of Plaintiff's Document Production (3000+pages).	285.00	0.80	228.00
	EPC	L510	A104	Review/analyze, redact, and prepare client documents for production to USSIC in Response to its Requests to Produce (3000+pages)(continued).	285.00	2.70	769.50
	TAD	L510	A108	Communicate (other external) - E-mail from Debra Walling re: guidelines for joint representation with Grosse Pointe Park as decided in closed session with Grosse Pointe Woods City Council.	285.00	0.10	28.50
09/14/2022	TAD	L510	A108	Communicate (other external) - E-mails (3) to and from Debra Walling and Clients re: proposal of joint representation of Grosse Pointe Woods and Grosse Pointe Park - Discussions with Nick Sizeland, GPP City Manager and his request for draft Retainer Agreement and Joint Defense Agreement.	285.00	0.30	85.50
09/16/2022	EPC	L510	A108	Communicate (other external) - E-mails (2) to and from Jonathan Walton re: status of Discovery Responses.	285.00	0.10	28.50
	EPC	L510	A104	Review/analyze, redact, and prepare client's documents for production to USSIC in Response to its Requests to Produce (3000+pages)(continued).	285.00	6.80	1,938.00
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: Document Production and redaction.	285.00	0.30	85.50
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: Document Production and redaction.	200.00	0.30	60.00
	SMM	L510	A104	Review/analyze Coverage Analysis in preparation of reviewing Grosse Pointe Woods' documents to be produced to USSIC.	200.00	2.60	520.00
	SMM	L510	A104	Review/analyze and compile all attachments contained within Grosse Pointe Woods' e-mail correspondences provided in preparation of review and redaction for production to USSIC (3000+pages)(begun).	200.00	1.20	240.00
09/19/2022	SMM	L510	A104	Review/analyze and compile all attachments contained within Grosse Pointe Woods' e-mail correspondences provided in preparation of review and redaction for Document Production to USSIC (3000+pages)(continued).	200.00	4.50	900.00

## USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
09/20/2022	MKF	L510	A110	Manage data/files - Reproduction, indexing, printing, and binding of voluminous "Confidential" and "Highly Confidential" Documents submitted by USSIC in Response to our Request for Document Production.	110.00	2.50	275.00
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Ms. McLeod re: Document Production.	285.00	0.40	114.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Ms. McLeod re: Document Production.	285.00	0.40	114.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Mr. Conn re: Document Production.	200.00	0.40	80.00
	EPC	L510	A108	Communicate (other external) - Telephone call with Jonathan Walton re: partial production of documents.	285.00	0.10	28.50
	EPC	L510	A104	Review/analyze and redact portions of e-mail attachments to be produced to USSIC (3000+pages)(continued).	285.00	3.80	1,083.00
	EPC	L510	A103	Draft/revise revisions to Responses to Requests to Produce (3000+pages).	285.00	0.40	114.00
	SMM	L510	A104	Review/analyze and revise Grosse Pointe Woods' Response to USSIC's Requests for Production of Documents (3000+pages).	200.00	0.30	60.00
	SMM	L510	A103	Draft/revise Letter to Jonathan Walton to enclose with GPW's Response to USSIC's Requests to Produce.	200.00	0.10	20.00
	SMM	L510	A104	Review/analyze Grosse Pointe Woods documents marked for redaction in preparation of producing to USSIC's Counsel (3000+pages).	200.00	3.90	780.00
	SMM	L510	A104	Review/analyze and redact Damage Assessment Reports in preparation of Document Production to USSIC (3000+pages).	200.00	0.90	180.00
09/21/2022	SMM	L510	A104	Review/analyze Grosse Pointe Woods documents marked for redaction in preparation of producing to Plaintiff's Counsel (3000+pages)(finalize).	200.00	0.70	140.00
	SMM	L510	A103	Draft/revise and redact additional e-mail correspondence in preparation of producing documents to Plaintiff's counsel (3000+pages).	200.00	0.80	160.00
	SMM	L510	A103	Draft/revise, categorize, organize, and Bates stamp Grosse Pointe Woods' e-mail correspondences as "Confidential" or "Highly Confidential" in preparation			

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				<u>Rate</u>	<u>Hours</u>	
			of producing to Plaintiff's Counsel (3000+pages).	200.00	3.70	740.00
	SMM	L510	A103 Draft/revise and redact Damage Assessment Reports in preparation of producing to Plaintiff (3000+pages).	200.00	1.50	300.00
	SMM	L510	A108 Communicate (other external) - E-mail to Jonathan Walton and Counsel of Record re: Grosse Pointe Woods' Response to USSIC's Requests to Produce.	200.00	0.10	20.00
09/22/2022	SMM	L510	A108 Communicate (other external) - E-mail from Erica Shell re: Grosse Pointe Woods' production of documents.	200.00	0.10	20.00
	SMM	L510	A103 Draft/revise and redact Damage Assessment Reports in preparation of producing to Plaintiff (3000+pages)(continued).	200.00	1.00	200.00
	SMM	L510	A103 Draft/revise, redact, and identify e-mail attachments as "Confidential" and "Highly Confidential" for Mr. Conn's review (3000+pages)(begun).	200.00	2.30	460.00
	SMM	L510	A104 Review/analyze relevant file materials in preparation of analysis and summary of Plaintiff's documents produced in response to Grosse Pointe Woods' Requests to Produce (3000+pages).	200.00	0.90	180.00
09/23/2022	TAD	L510	A108 Communicate (other external) - E-mail from Jonathan Walton to Grosse Pointe Park's Counsel re: nature, lateness, and incompleteness of GPP's production of documents.	285.00	0.10	28.50
	TAD	L510	A105 Communicate (in firm) - Conference with Mr. Conn re: Grosse Pointe Park's Document Production snafu.	285.00	0.30	85.50
	EPC	L510	A105 Communicate (in firm) - Conference with Mr. Diemer re: Grosse Pointe Park's Document Production snafu.	285.00	0.30	85.50
	SMM	L510	A103 Draft/revise and redact Damage Assessment Reports in preparation of producing to Plaintiff (3000+pages)(finalize).	200.00	0.90	180.00
	SMM	L510	A103 Draft/revise, redact, and identify e-mail attachments as "Confidential" and "Highly Confidential" for Mr. Conn's review (3000+pages)(continued).	200.00	1.10	220.00
	SMM	L510	A108 Communicate (other external) - E-mail to Erica Shell re: Grosse Pointe Woods' Discovery Responses.	200.00	0.10	20.00
	SMM	L510	A104 Review/analyze Grosse Pointe Woods' draft			

## USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
				Witness List.	200.00	0.50	100.00
09/26/2022	SMM	L510	A104	Review/analyze and sort all e-mail attachments as "Confidential" or "Highly Confidential" for Discovery Responses and Mr. Conn's review (3000+pages)(continued).	200.00	4.10	820.00
	SMM	L510	A104	Review/analyze and redact e-mail attachments for Discovery Responses and Mr. Conn's review (3000+pages)(finalize).	200.00	1.70	340.00
09/27/2022	TAD	L510	A103	Draft/revise Letter to Ms. Walling re: Joint Defense Agreement.	285.00	0.30	85.50
	EPC	L510	A103	Draft/revise and finalize proposed Joint Defense Agreement.	285.00	0.50	142.50
	TAD	L510	A108	Communicate (other external) - E-mail to City Representatives with Audit Letter.	285.00	0.10	28.50
	EPC	L510	A103	Draft/revise and finalize Supplemental Document Production to USSIC (3000+pages).	285.00	5.80	1,653.00
	EPC	L510	A108	Communicate (other external) - Conference Call with Jonathan Walton re: Initial Document Production to USSIC.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: Grosse Pointe Woods Second Document Production, redactions to GPW's Document Production, and additional documents to be produced.	200.00	0.50	100.00
	EPC	L510	A108	Communicate (other external) - E-mail to Jonathan Walton re: Supplemental Document Production to USSIC.	285.00	0.10	28.50
	SMM	L510	A103	Draft/revise and redact additional information from Grosse Pointe Wood's Damage Assessment Excel Spreadsheets in preparation of producing to Plaintiff (3000+pages).	200.00	0.50	100.00
	EPC	L510	A108	Communicate (other external) - E-mail to Jonathan Walton re: Document Production - Redacted Excel Spreadsheet.	285.00	0.10	28.50
	SMM	L510	A104	Review/analyze file material in preparation of updating Grosse Pointe Woods' Witness List for Mr. Conn's review.	200.00	0.60	120.00
	SMM	L510	A104	Review/analyze Grosse Pointe Park's Document Production (3000+pages).	200.00	0.50	100.00

					<u>Rate</u>	<u>Hours</u>	
	SMM	L510	A104	Review/analyze "Confidential" and "Highly Confidential" documents for additional sorting and redactions per comments from Mr. Conn in preparation of producing to Plaintiff (3000+pages).	200.00	2.40	480.00
	SMM	L510	A103	Draft/revise Second Document Production to be produced to Plaintiff (continued).	200.00	1.70	340.00
09/28/2022	TAD	L510	A108	Communicate (other external) - E-mail from Debra Walling re: Council's Conditions in the Joint Defense Agreement.	285.00	0.10	28.50
	SMM	L510	A103	Draft/revise Second Document Production to be produced to Plaintiff (3000+pages)(finalize).	200.00	2.90	580.00
	SMM	L510	A103	Draft/revise and Bates stamp "Confidential" and "Highly Confidential" documents to be produced to Plaintiff (3000+pages).	200.00	0.30	60.00
	SMM	L510	A103	Draft/revise Letter to Jonathan Walton re: Grosse Pointe Woods' additional Document Production.	200.00	0.20	40.00
09/29/2022	EPC	L510	A103	Draft/revise our Witness List.	285.00	0.40	114.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: Witness List and additional individuals to be added.	200.00	0.30	60.00
	SMM	L510	A104	Review/analyze file material in preparation of revising draft Witness List.	200.00	0.40	80.00
	SMM	L510	A103	Draft/revise Grosse Pointe Woods' Witness List in accordance with Mr. Conn's comments.	200.00	0.90	180.00
	SMM	L510	A104	Review/analyze and summarize Grosse Pointe Park's Document Production (begun).	200.00	0.80	160.00
09/30/2022	TAD	L510	A103	Draft/revise Witness List (finalize) - E-file with the Court.	285.00	0.30	85.50
	SMM	L510	A104	Review/analyze USSIC's Witness List.	200.00	0.20	40.00
	SMM	L510	A104	Review/analyze and summarize Grosse Pointe Park's initial Document Production (continued).	200.00	0.50	100.00
				For Current Services Rendered		83.20	19,313.50

Expenses

09/20/2022	L510	E101	Copying - "Confidential" Documents submitted by USSIC in Response to our Request for Document Production.				171.00
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09/20/2022	L510	E101	Copying - "Highly Confidential" Documents submitted by USSIC in Response to our Request for Document Production.	586.50
				<u>757.50</u>

<b>Total Fees and Costs:</b>	20,071.00
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Previous Balance	\$5,830.50
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Payments

09/22/2022		Payment - CK#64497 - Thank you!	-5,830.50
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<b><u>Balance Due</u></b>	<b><u>\$20,071.00</u></b>
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Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
98,417.50	845.05	0.00	79,191.55

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L510	Appellate Motions and Submissions	19313.50	<u>757.50</u>
L500	Appeal	19,313.50	757.50

Please Remit	<b><u>\$20,071.00</u></b>
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592536812.000

Sm 10/10/22

FS 10-10-22

Final Statement Run Totals 10/06/2022

Statements Printed:	1
Hours:	83.20
Fees:	19,313.50
Expenses:	757.50