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

Page: 1
December 06, 2022
Claim No: JPJPC-20222Q
Statement No: 14

RECEIVED

USSIC v City of Grosse Pointe Woods

DEC 12 2022

**CITY OF GROSSE POINTE WOODS
CLERK'S DEPARTMENT**

For Professional Services through : 11/30/2022

					<u>Rate</u>	<u>Hours</u>	
11/01/2022	EPC	L510	A108	Communicate (other external) - E-mail to Jonathan Walton re: adjournment and Joint Defense Agreement [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
	EPC	L510	A108	Communicate (other external) - Telephone call with Jonathan Walton re: adjournment of Discovery and Depositions [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
	SMM	L510	A104	Review/analyze USSIC's Deposition Notice to Grosse Pointe Woods and the Woods' Document Production in preparation for Conference Call with Clients.	200.00	0.40	80.00
	SMM	L510	A103	Draft/revise e-mail Correspondence to Clients re: Meeting to discuss Grosse Pointe Woods' Depositions and follow-up items from Grosse Pointe Woods.	200.00	0.30	60.00
	EPC	L510	A103	Draft/revise and finalize e-mail Correspondence to Clients re: Meeting to discuss Grosse Pointe Woods' Depositions and follow-up items from Grosse Pointe Woods.	285.00	0.10	28.50
	EPC	L510	A109	Appear for/attend Conference Call with Clients and Ms. McLeod re: Deposition Witnesses.	285.00	1.00	285.00
	SMM	L510	A109	Appear for/attend Conference Call with Clients and Mr. Conn re: Deposition Witnesses.	200.00	1.00	200.00
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: telephone call with Mr. Walton and Scheduling Order.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: telephone call with Mr. Walton and Scheduling Order.	200.00	0.20	40.00

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					<u>Rate</u>	<u>Hours</u>	
11/02/2022	EPC	L510	A108	Communicate (other external) - E-mail to Mr. Walton and Ms. Rajanjini (lengthy) re: Grosse Pointe Woods and Grosse Pointe Park Document Production, Witness Depositions, and USSIC's Document Production [JOINT TASK FOR GPP/GPW].	142.50	0.30	42.75
11/04/2022	EPC	L510	A108	Communicate (other external) - E-mails (2) to and from Jonathan Walton re: GPP/GPW Document Production, Depositions, and USSIC's Document Production [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
11/08/2022	EPC	L510	A108	Communicate (other external) - E-mails (10) to and from Susan Como re: Witnesses for Deposition Preparation Meetings; dates, times, and location.	285.00	0.50	142.50
	SMM	L510	A108	Communicate (other external) - E-mail from Debra Walling re: flood information sent out to residents.	200.00	0.10	20.00
	SMM	L510	A104	Review/analyze Index of USSIC's Discovery Responses to determine Bates numbers for Excel sheets to request native files from USSIC's Counsel.	200.00	0.50	100.00
11/09/2022	EPC	L510	A108	Communicate (other external) - E-mail to Paul Doherty re: expert in rainwater / pollution [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
11/11/2022	SMM	L510	A101	Plan and prepare for Conference with Mr. Walton and Mr. Conn - Analyze prior Scheduling Order [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
	EPC	L510	A109	Appear for/attend Conference with Mr. Walton and Ms. McLeod re: Discovery and Briefing Schedule [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
	SMM	L510	A109	Appear for/attend Conference with Mr. Walton and Mr. Conn re: Discovery and Briefing Schedule [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
	EPC	L510	A108	Communicate (other external) - E-mail to Mr. Walton re: native Excel spreadsheets.	285.00	0.10	28.50
	EPC	L510	A104	Review/analyze Damage Claims and Reports for production to USSIC (begun) (1100 of 4000 pages) [JOINT TASK FOR GPP/GPW].	142.50	2.60	370.50
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: Deposition Preparation Meetings and materials to compile.	285.00	0.20	57.00

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	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: Deposition Preparation Meetings and materials to compile.	200.00	0.20	40.00
	SMM	L510	A103	Draft/revise Redaction Log for "Highly Confidential" documents (continued).	200.00	0.50	100.00
11/14/2022	EPC	L510	A104	Review/analyze Notice Forms for production to USSIC (continued) (1500 of 4000 pages).	285.00	4.80	1,368.00
	EPC	L510	A101	Plan and prepare for City Council Meeting - Analyze Coverage Analysis, status of Discovery, and recent e-mail communications.	285.00	1.60	456.00
	SMM	L510	A101	Plan and prepare for City Council Meeting - Analyze relevant file materials.	200.00	0.20	40.00
	TAD	L510	A109	Appear for/attend City Council Meeting re: Joint Defense Agreement and case status update.	285.00	0.80	228.00
	EPC	L510	A109	Appear for/attend City Council Meeting re: Joint Defense Agreement and case status update.	285.00	0.80	228.00
	SMM	L510	A109	Appear for/attend City Council Meeting re: Joint Defense Agreement and case status update.	200.00	0.80	160.00
11/15/2022	TAD	L510	A108	Communicate (other external) - E-mails (4) between Sue Como at Grosse Pointe Woods and Warren Rothe at Grosse Pointe Park re: signed Joint Defense Agreement [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
11/16/2022	EPC	L510	A108	Communicate (other external) - E-mails (2) from and to Steve Heikkinen of Superior Investigative Services re: Robert Bucko service of Subpoena [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
	SMM	L510	A102	Research re: additional indicators about Robert Bucko to assist S. Heikkinen with service of the Subpoena [JOINT TASK FOR GPP/GPW].	100.00	0.70	70.00
	SMM	L510	A103	Draft/revise First Amended Witness List for Mr. Conn's review.	200.00	0.30	60.00
	EPC	L510	A103	Draft/revise First Amended Witness List.	285.00	0.30	85.50
	SMM	L510	A103	Draft/revise Redaction Log for "Highly Confidential" Documents (continued).	200.00	0.40	80.00
11/18/2022	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: flood reports from Grosse Pointe Woods' residents.	285.00	0.20	57.00

				<u>Rate</u>	<u>Hours</u>		
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: flood reports from Grosse Pointe Woods' residents.	200.00	0.20	40.00
	SMM	L510	A103	Draft/revise draft Amended Witness List per Mr. Conn's comments.	200.00	0.10	20.00
	SMM	L510	A103	Draft/revise Redaction Log for "Highly Confidential" Documents (continued).	200.00	0.60	120.00
	EPC	L510	A104	Review/analyze Damages Notices for production to USSIC (continued) (900 of 4000 pages).	285.00	2.70	769.50
11/22/2022	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: document preparation for Grosse Pointe Woods Deposition Preparation Meetings.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: document preparation for Grosse Pointe Woods Deposition Preparation Meetings.	200.00	0.20	40.00
	SMM	L510	A104	Review/analyze Notices of Claims and Damages Reports in preparation of producing to USSIC.	200.00	0.60	120.00
	EPC	L510	A104	Review/analyze Damages Notices and Reports to produce to USSIC.	285.00	3.10	883.50
	EPC	L510	A104	Review/analyze and identify GPW Witnesses and ascertain documents necessary to meet with them in preparation for testifying at Depositions.	285.00	1.70	484.50
	EPC	L510	A103	Draft/revise list of topics for Deposition testimony from USSIC and potential need for <i>duces tecum</i> requests based on lack of documentation produced in first round of Requests to Produce [JOINT TASK FOR GPP/GPW].	142.50	1.40	199.50
11/23/2022	TAD	L510	A104	Review/analyze Deposition Topics from Mr. Conn - Add suggested lines of questioning of USSIC representatives to bolster coverage case [JOINT TASK FOR GPP/GPW].	142.50	1.10	156.75
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: insurance policy and outline for preparation of Grosse Pointe Woods Witnesses.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: insurance policy and outline for preparation of Grosse Pointe Woods Witnesses.	200.00	0.20	40.00
	SMM	L510	A104	Review/analyze insurance policy in preparation of			

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				<u>Rate</u>	<u>Hours</u>	
			GPW Deposition Preparation Meetings.	200.00	0.80	160.00
	SMM	L510	A103 Draft/revise list of Grosse Pointe Woods Witnesses and associated topics in anticipation of producing same to USSIC.	200.00	0.30	60.00
	SMM	L510	A108 Communicate (other external) - E-mail to Mr. Schulte, Ms. Como, and Ms. Walling re: additional GPW Witnesses and independent contractor agreements.	200.00	0.10	20.00
	SMM	L510	A104 Review/analyze relevant file materials to assemble documents for use at GPW Deposition Preparation Meetings.	200.00	0.70	140.00
	SMM	L510	A104 Review/analyze Notices of Claims and Damages Reports in preparation of producing to USSIC (continued).	200.00	1.40	280.00
11/25/2022	SMM	L510	A104 Review/analyze Notices of Claims and Damages Reports in preparation of producing to USSIC (continued).	200.00	0.80	160.00
11/27/2022	SMM	L510	A104 Review/analyze Notices of Claims and Damages Reports in preparation of producing to USSIC (continued) (Sunday work).	200.00	0.90	180.00
11/28/2022	SMM	L510	A104 Review/analyze additional file materials in preparation of preparing documents for Deposition Preparation Meetings with GPW Witnesses.	200.00	1.60	320.00
	SMM	L510	A103 Draft/revise, compile, and organize documents for Deposition Preparation Meetings with GPW Witnesses.	200.00	0.80	160.00
	SMM	L510	A108 Communicate (other external) - E-mail from Ms. Como re: additional GPW Witness and independent contractor agreements.	200.00	0.10	20.00
	EPC	L510	A108 Communicate (other external) - E-mails (4) to and from Superior Investigation re: service of process for Subpoena on Robert Bucko [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
	EPC	L510	A108 Communicate (other external) - E-mail to Jonathan Walton re: Stipulated Order adjourning Discovery [JOINT TASK FOR GPP/GPW].	142.50	0.20	28.50
11/29/2022	EPC	L510	A104 Review/analyze Request to Produce to Grosse Pointe Woods in underlying case.	285.00	0.50	142.50
	SMM	L510	A104 Review/analyze Discovery Request to Grosse			

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				<u>Rate</u>	<u>Hours</u>	
			Pointe Woods in underlying case.	200.00	0.20	40.00
EPC	L510	A108	Communicate (other external) - E-mails (2) from and to Frank Schulte with lengthy e-mail from Tom Landa of McGraw Morris.	285.00	0.20	57.00
TAD	L510	A108	Communicate (other external) - E-mail to Mr. Schulte, Ms. Walling, and Ms. Como lengthy re: discovery avoidance in underlying matter affects our coverage matter.	285.00	0.20	57.00
EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: Deposition Preparation Meetings with Grosse Pointe Woods Witnesses.	285.00	0.20	57.00
SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: Deposition Preparation Meetings with Grosse Pointe Woods Witnesses.	200.00	0.20	40.00
EPC	L510	A101	Plan and prepare for Deposition Preparation Meetings with S. Lockwood, F. Caricalli, J. Kowalski, M. Crook, and E. Hall - Analyze documents and draft Outlines for discussion based on the topics on which each Witness is called to testify.	285.00	4.80	1,368.00
SMM	L510	A101	Plan and prepare for Deposition Preparation Meetings - Analyze Policy Documents, review and edit Outlines for meetings, and prepare materials to be used during meetings.	200.00	2.20	440.00
EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: service of process of Subpoena on Robert Bucko [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: service of process of Subpoena on Robert Bucko [JOINT TASK FOR GPP/GPW].	100.00	0.10	10.00
EPC	L510	A108	Communicate (other external) - E-mails (2) with Jonathan Walton re: Stipulation and Order and deadline to produce documents [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
EPC	L510	A108	Communicate (other external) - E-mails (3) to and from Superior Investigations re: service of process of Subpoena on Robert Bucko [JOINT TASK FOR GPP/GPW].	142.50	0.10	14.25
EPC	L510	A104	Review/analyze relevant file materials and evaluate upcoming deadlines to create litigation strategy [JOINT TASK FOR GPP/GPW.]	142.50	0.50	71.25

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					<u>Rate</u>	<u>Hours</u>	
11/30/2022	EPC	L510	A101	Plan and prepare for Hearing on Motions to Quash and Status Conference [JOINT TASK FOR GPP/GPW].	142.50	1.10	156.75
	SMM	L510	A104	Review/analyze underlying case docket for information re: discovery requests [JOINT TASK FOR GPP/GPW].	100.00	0.20	20.00
	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Frank Schulte re: Tom Landa.	285.00	0.10	28.50
	SMM	L510	A101	Plan and prepare for Deposition Preparation Meetings - Analyze relevant file materials and documents.	200.00	0.50	100.00
	EPC	L510	A109	Appear for/attend travel to Grosse Pointe Woods for Deposition Preparation Meetings with Witnesses.	285.00	0.50	142.50
	SMM	L510	A109	Appear for/attend travel to Grosse Pointe Woods for Deposition Preparation Meetings with Witnesses.	200.00	0.50	100.00
	EPC	L510	A109	Appear for/attend Deposition Preparation Meetings with S. Lockwood, F. Varicalli, and F. Schulte.	285.00	1.90	541.50
	SMM	L510	A109	Appear for/attend Deposition Preparation Meetings with S. Lockwood, F. Varicalli, and F. Schulte.	200.00	1.90	380.00
	EPC	L510	A109	Appear for/attend Deposition Preparation Meetings with J. Kowalski, M. Crook, E. Hall, and F. Schulte.	285.00	2.30	655.50
	SMM	L510	A109	Appear for/attend Deposition Preparation Meetings with J. Kowalski, M. Crook, E. Hall, and F. Schulte.	200.00	2.30	460.00
	EPC	L510	A109	Appear for/attend Meeting with Mr. Schulte and Ms. McLeod re: overall presentation of Witnesses, additional items needed from GPW, and discovery in underlying litigation and USSIC's Counts in the Dec Action Complaint.	285.00	0.40	114.00
	SMM	L510	A109	Appear for/attend Meeting with Mr. Schulte and Mr. Conn re: overall presentation of Witnesses, additional items needed from GPW, and discovery in underlying litigation and USSIC's Counts in the Dec Action Complaint.	200.00	0.40	80.00
	SMM	L510	A103	Draft/revise follow-up Memorandum for file re: summary of Deposition Preparation Meetings with GPW Witnesses.	200.00	<u>1.10</u>	<u>220.00</u>
				For Current Services Rendered		63.20	14,525.75

Total Fees and Costs:	14,525.75
Previous Balance	\$6,525.11

Payments

11/17/2022

Payment - CK#65018 - Thank you!	-6,525.11
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<u>Balance Due</u>	<u>\$14,525.75</u>
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Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
119,390.25	923.16	0.00	105,787.66

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L510	Appellate Motions and Submissions	14525.75	0.00
L500	Appeal	14,525.75	0.00

Please Remit	<u>\$14,525.75</u>
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592536812.00

Sm 12/2/22

FS 12-7-22

Final Statement Run Totals 12/06/2022

Statements Printed:	1
Hours:	63.20
Fees:	14,525.75