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

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November 07, 2022  
Claim No: JPJPC-20222Q  
Statement No: 13

USSIC v City of Grosse Pointe Woods

**For Professional Services through : 10/31/2022**

					<u>Rate</u>	<u>Hours</u>	
09/26/2022	TAD	L510	A103	Draft/revise Joint Defense Agreement (begun). [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	3.50	498.75
09/27/2022	TAD	L510	A103	Draft/revise Joint Defense Agreement (draft for client review.) [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	6.00	855.00
	EPC	L510	A103	Draft/revise Joint Defense Agreement (continued). [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.50	71.25
10/03/2022	EPC	L510	A108	Communicate (other external) - E-mails (8) to and from Jonathan Walton re: Deposition discussions and Discovery.	285.00	0.40	114.00
	EPC	L510	A104	Review/analyze Witness List of USSIC.	285.00	0.50	142.50
	EPC	L510	A103	Draft/revise Subpoena to Robert Bucko re: production of documents.	285.00	0.30	85.50
	EPC	L510	A103	Draft/revise Subpoena to Stevenson Company re: production of documents.	285.00	0.10	28.50
	EPC	L510	A103	Draft/revise Redaction Log for Document Production (begun).	285.00	1.20	342.00
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: Discovery and Depositions.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: Discovery and Depositions.	200.00	0.20	40.00
	SMM	L510	A108	Communicate (other external) - E-mails (4) from and to Mr. Conn and Mr. Walton re: Grosse Pointe Woods' Document Production and upload.	200.00	0.20	40.00

## USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
	SMM	L510	A103	Draft/revise and upload Documents to shared site for Plaintiff's Counsel's review.	200.00	0.30	60.00
	TAD	L510	A108	Communicate (other external) - E-mails (2) to and from Debra Walling re: Letter to Grosse Pointe Park regarding conditions of joint representation.	285.00	0.10	28.50
	TAD	L510	A104	Review/analyze Witness List of USSIC.	285.00	0.10	28.50
10/04/2022	EPC	L510	A108	Communicate (other external) - E-mails (2) from and to Jonathan Walton re: Depositions and Discovery.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mail to Debra Walling re: splitting of costs and fees as part of a joint defense.	285.00	0.10	28.50
10/07/2022	EPC	L510	A108	Communicate (other external) - E-mails (2) to and from Jonathan Walton re: 10/10/22 Meeting to discuss Depositions.	285.00	0.10	28.50
	SMM	L510	A108	Communicate (other external) - E-mails (2) from Mr. Conn and Jonathan Walton re: 10/10/22 Meeting to discuss Depositions.	200.00	0.10	20.00
10/10/2022	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: litigation strategy and upcoming tasks.	285.00	0.20	57.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer re: litigation strategy and upcoming tasks.	285.00	0.20	57.00
	SMM	L510	A101	Plan and prepare for Conference Call with USSIC Counsel - Analyze file materials relevant to discovery and depositions.	200.00	0.30	60.00
	TAD	L510	A109	Appear for/attend Conference Call with Mr. Walton, Mr. Conn, and Ms. McLeod re: discovery issues and tolling proposal.	285.00	0.50	142.50
	EPC	L510	A109	Appear for/attend Conference Call with Mr. Walton, Mr. Diemer, and Ms. McLeod re: discovery issues and tolling proposal.	285.00	0.50	142.50
	SMM	L510	A109	Appear for/attend Conference Call with Mr. Walton, Mr. Conn, and Mr. Diemer re: discovery issues and tolling proposal.	200.00	0.50	100.00
	SMM	L510	A103	Draft/revise e-mail to Mr. Conn summarizing items discussed during Conference Call with USSIC's Counsel.	200.00	0.50	100.00

USSIC v City of Grosse Pointe Woods

				<u>Rate</u>	<u>Hours</u>		
	SMM	L510	A108	Communicate (other external) - E-mail from Mr. Conn to Ms. Walling and Grosse Pointe Woods Representatives re: Conference Call with Mr. Walton and Document Production.	200.00	0.20	40.00
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Ms. McLeod re: tolling agreement and Depositions.	285.00	0.20	57.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Ms. McLeod re: tolling agreement and Depositions.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Mr. Diemer re: tolling agreement and Depositions.	200.00	0.20	40.00
10/11/2022	EPC	L510	A108	Communicate (other external) - E-mails (4) to and from Ms. Walling and Mr. Schulte re: Document Production and status updates.	285.00	0.20	57.00
	SMM	L510	A108	Communicate (other external) - E-mails (4) from Mr. Conn, Ms. Walling and Mr. Schulte re: Document Production and status updates.	200.00	0.20	40.00
10/12/2022	SMM	L510	A102	Research re: potential insurance experts.	200.00	0.60	120.00
	TAD	L510	A108	Communicate (other external) - E-mail from Jonathan Walton (lengthy) re: Corporate Representative Depositions and Document Production. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.10	14.25
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: Discovery and Deposition Schedule proposed by USSIC. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.40	57.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer re: Discovery and Deposition Schedule proposed by USSIC. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.40	57.00
10/15/2022	TAD	L510	A102	Research re: right of an insurer to recoup defense costs - Michigan case law and Restatement (Saturday work). [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	1.20	171.00
10/16/2022	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Ms. McLeod re: USSIC's Document Production (Sunday work).	285.00	0.30	85.50

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					<u>Rate</u>	<u>Hours</u>	
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Ms. McLeod re: USSIC's Document Production (Sunday work).	285.00	0.30	85.50
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn and Mr. Diemer re: USSIC's Document Production (Sunday work).	200.00	0.30	60.00
10/18/2022	TAD	L510	A108	Communicate (other external) - E-mails (3) to and from Debra Walling and Frank Schulte with Joint Defense Agreement re: attendance at Grosse Pointe Park Council Meeting.	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise Joint Defense Agreement (continued) - Update draft. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.20	28.50
	TAD	L510	A104	Review/analyze Joint Defense Agreement - Update draft. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.20	28.50
	ATZ	L510	A110	Manage data/files - Indexing Document Production (begun). [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	100.00	5.50	550.00
10/19/2022	ATZ	L510	A110	Manage data/files (completed) - Indexing Document Production. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	100.00	4.50	450.00
	TAD	L510	A108	Communicate (other external) - E-mail from Mr. Walton's Office with Notice of Examination of Grosse Pointe Woods. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.10	14.25
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: USSIC's Document Production and missing items.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: USSIC's Document Production and missing items.	200.00	0.20	40.00
	EPC	L510	A108	Communicate (other external) - E-mail to and from all Counsel re: transition of Grosse Pointe Park file from Bodman to Jacobs and Diemer. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.10	14.25
10/20/2022	TAD	L510	A108	Communicate (other external) - E-mail from Debra Walling re: Joint Defense Agreement.	285.00	0.10	28.50
	EPC	L510	A108	Communicate (other external) - E-mail from Debra			

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					<u>Rate</u>	<u>Hours</u>	
				Walling re: Joint Defense Agreement.	285.00	0.10	28.50
10/21/2022	TAD	L510	A108	Communicate (other external) - E-mail to Debra Walling re: Modified Retainer Agreement and Modified Joint Defense Agreement for review by Mayor and City Council.	285.00	0.10	28.50
	SMM	L510	A104	Review/analyze and finalize Redaction Log of "Confidential" documents produced to USSIC.	200.00	0.60	120.00
	SMM	L510	A103	Draft/revise Redaction Log of "Highly Confidential" documents produced to USSIC (begun).	200.00	0.50	100.00
	SMM	L510	A104	Review/analyze Request for Examination of GPW Representatives from USSIC.	200.00	0.20	40.00
	TAD	L510	A108	Communicate (other external) - E-mail from Jonathan Walton re: outstanding Discovery issues. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.10	14.25
10/23/2022	TAD	L510	A108	Communicate (other external) - E-mail to Debra Walling with Joint Defense Agreement and modified Retainer Agreement with her revisions (Sunday work).	285.00	0.10	28.50
10/24/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Debra Walling re: clarification on need for special meeting to approve the new Agreements before 11/14/22 Council Meeting.	285.00	0.10	28.50
10/25/2022	EPC	L510	A108	Communicate (other external) - E-mail to Mr. Schulte and Ms. Walling re: Notice of Taking Corporate Deposition.	285.00	0.10	28.50
	SMM	L510	A104	Review/analyze indices of USSIC's Document Production to determine which items are missing from production and still need to be provided to USSIC.	200.00	0.30	60.00
	EPC	L510	A105	Communicate (in firm) - Conference with Ms. McLeod re: USSIC Document Production, Grosse Pointe Woods' additional Document Requests, and Damage Report Production to USSIC.	285.00	0.20	57.00
	SMM	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: USSIC Document Production, Grosse Pointe Woods' additional Document Requests, and Damage Report Production to USSIC.	200.00	0.20	40.00
	EPC	L510	A101	Plan and prepare for Discovery Conference Call with Mr. Walton and Ms. McLeod - Analyze			

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					<u>Rate</u>	<u>Hours</u>	
				Discovery Requests and Notices of Deposition. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.50	71.25
SMM	L510	A101		Plan and prepare for Discovery Conference Call with Mr. Walton and Mr. Conn - Analyze relevant file materials and prepare Agenda. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	100.00	0.10	10.00
EPC	L510	A109		Appear for/attend Discovery Conference Call with Mr. Walton and Ms. McLeod re: Discovery, Document Production, and Depositions. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.30	42.75
SMM	L510	A109		Appear for/attend Discovery Conference Call with Mr. Walton and Mr. Conn re: Discovery, Document Production, and Depositions. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	100.00	0.30	30.00
TAD	L510	A105		Communicate (in firm) - Conference with Mr. Conn and Ms. McLeod re: Discovery Conference Call with Mr. Walton. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.20	28.50
EPC	L510	A105		Communicate (in firm) - Conference with Mr. Diemer and Ms. McLeod re: Discovery Conference Call with Mr. Walton. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	142.50	0.20	28.50
SMM	L510	A105		Communicate (in firm) - Conference with Mr. Conn and Mr. Diemer re: Discovery Conference Call with Mr. Walton. [JOINT TASK PERFORMED ON BEHALF OF GPW & GPP - CHARGE SPLIT]	100.00	0.20	20.00
10/26/2022	EPC	L510	A108	Communicate (other external) - E-mail to Mr. Schulte and Ms. Walling re: meeting to discuss Depositions.	285.00	0.10	28.50
10/27/2022	SMM	L510	A103	Draft/revise Redaction Log (continued) - "Highly Confidential" documents produced to USSIC.	200.00	0.50	100.00
10/28/2022	EPC	L510	A108	Communicate (other external) - E-mail from Frank Schulte re: Meeting to discuss witnesses for Depositions.	285.00	0.10	28.50
	SMM	L510	A103	Draft/revise Second Requests for Production to USSIC (draft for Mr. Conn's review).	200.00	0.60	120.00
10/31/2022	EPC	L510	A108	Communicate (other external) - E-mail to Frank			

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	<u>Rate</u>	<u>Hours</u>	
Schulte re: meeting to discuss Deposition witnesses.	285.00	0.10	28.50
For Current Services Rendered		38.50	6,447.00

**Expenses**

10/03/2022	L510	E124	Other - Postage Fees for Certified Mail, Return Receipt, Restricted Delivery for two Subpoenas to Robert Bucko and The Stevenson Company.	28.82
10/10/2022	L510	E124	Other - FedEx delivery to Jonathan Walton in Chicago with thumb drive of Discovery documents.	22.37
10/12/2022	L510	E124	Other - FedEx delivery to Jonathan Walton in Chicago with second thumb drive of Discovery documents.	26.92
				<u>78.11</u>
<b>Total Fees and Costs:</b>				6,525.11
Previous Balance				\$20,071.00

**Payments**

10/20/2022			Payment - CK#64753 - Thank you!	-20,071.00
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**Balance Due** \$6,525.11

Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
104,864.50	923.16	0.00	99,262.55

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L510	Appellate Motions and Submissions	6,447.00	78.11
L500	Appeal	6,447.00	78.11

Please Remit \$6,525.11

592536812.000

SM 11/7/22  
 FS 11-7-22

Final Statement Run Totals 11/07/2022

Statements Printed:	1
Hours:	38.50
Fees:	6,447.00
Expenses:	78.11