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

Page: 1
May 23, 2022
Claim No: JPJPC-20222Q
Statement No: 5

RECEIVED

MAY 31 2022

USSIC v City of Grosse Pointe Woods

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

For Professional Services through : 04/30/2022

					<u>Rate</u>	<u>Hours</u>	
04/01/2022	TAD	L510	A108	Communicate (other external) - E-mail to Defense Team re: Status Conference in Grosse Pointe Park matter - Judge Allen vs Judge Sullivan and a Motion to Consolidate Cases - Combined system and what type of system Grosse Pointe Woods has.	285.00	0.10	28.50
04/04/2022	TAD	L510	A108	Communicate (other external) - E-mail from Debra Walling with documents from Trident/Argonaut re: sewer back-up coverage - Request for Mr. Diemer to review and provide assessment.	285.00	0.10	28.50
04/05/2022	TAD	L510	A108	Communicate (other external) - E-mails (3) to and from Defense Team re: cancellation of Tokio Marine Policy and review of documents from Nickel & Saph Agency.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mails (3) to and from Defense Team re: approval of Motion to Consolidate Cases under Judge Allen.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - Telephone call with Debra Walling re: Motion to Reassign the Case to Judge Allen.	285.00	0.20	57.00
	TAD	L510	A108	Communicate (other external) - Telephone call with Mr. Diemer, Mr. Conn, Mr. Howlett, and Ms. Shell, Counsel for Grosse Pointe Park re: Joint Motion to Reassign Cases.	285.00	0.30	85.50
	EPC	L510	A108	Communicate (other external) - Telephone call with Mr. Diemer, Mr. Conn, Mr. Howlett, and Ms. Shell, Counsel for Grosse Pointe Park re: Joint Motion to Reassign Cases.	285.00	0.30	85.50

				<u>Rate</u>	<u>Hours</u>		
	TAD	L510	A102	Research re: reassignment under MCR 8.111(D).	285.00	3.60	1,026.00
	TAD	L510	A103	Draft/revise Joint Motion to Reassign or Consolidate the insurance coverage cases against Grosse Pointe Woods and Grosse Pointe Park (work until 10 pm) [NO CHARGE] .	0.00	3.50	0.00
	EPC	L510	A103	Draft/revise Joint Motion to Reassign or Consolidate Declaratory Judgment Actions against Grosse Pointe Woods and Grosse Pointe Park [NO CHARGE] .	0.00	1.40	0.00
04/06/2022	TAD	L510	A102	Research re: whether a business court case can be consolidated with a non-business court proceeding in front of Judge Berry.	285.00	0.90	256.50
	TAD	L510	A108	Communicate (other external) - Telephone calls (3) with Ms. Shell, Counsel for Grosse Pointe Park re: Joint Motion to Consolidate the cases before Judge Allen.	285.00	0.60	171.00
	EPC	L510	A108	Communicate (other external) - Telephone calls (3) with Ms. Shell, Counsel for Grosse Pointe Park re: Joint Motion to Consolidate the cases before Judge Allen.	285.00	0.60	171.00
	TAD	L510	A108	Communicate (other external) - Telephone call with Mr. Walton, Counsel for USSIC re: Concurrence in Consolidation Motion.	285.00	0.30	85.50
	EPC	L510	A108	Communicate (other external) - Telephone call with Mr. Walton, Counsel for USSIC re: Concurrence in Consolidation Motion and request for copy of <i>Pro Hac Vice</i> Motions.	285.00	0.30	85.50
	EPC	L510	A103	Draft/revise Motion to Consolidate (continued) - Draft for review and coordination with Grosse Pointe Park [NO CHARGE] .	0.00	3.30	0.00
	TAD	L510	A103	Draft/revise Motion to Reassign Case and to Consolidate (continued) [NO CHARGE] .	0.00	5.20	0.00
	TAD	L510	A108	Communicate (other external) - E-mail to Defense Team (lengthy) re: Judicial Assignment procedure in Wayne Circuit Court - Motion to Consolidate ready to go once decision is made - Counter-Complaint timing.	285.00	0.20	57.00
04/07/2022	EPC	L510	A108	Communicate (other external) - Telephone call with Clerk of the Court re: Motion to Consolidate in Business Court.	285.00	0.30	85.50

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				<u>Rate</u>	<u>Hours</u>		
EPC	L510	A104	Review/analyze executed Order from Court re: Status Conference and Briefing Schedule.	285.00	0.10	28.50	
EPC	L510	A108	Communicate (other external) - Telephone call with Jonathan Walton re: Motion to Reassign and Consolidate.	285.00	0.20	57.00	
TAD	L510	A108	Communicate (other external) - E-mails (4) from and to Jonathan Walton re: proposed Motion to Reassign and Consolidate USSIC's cases against Grosse Pointe Woods and Grosse Pointe Park.	285.00	0.20	57.00	
TAD	L510	A108	Communicate (other external) - Telephone call with Jonathan Walton re: Motion to Reassign and Consolidate.	285.00	0.30	85.50	
EPC	L510	A103	Draft/revise Motion to Reassign and Consolidate (continued) - Include Section re: disruption to payment of defense costs in the event of inconsistent rulings and to remove references to pleading being a "Joint" Motion [NO CHARGE] .	0.00	3.20	0.00	
TAD	L510	A103	Draft/revise Motion to Reassign and Consolidate (continued) - Draft for Defense Team review and Grosse Pointe Park Counsel [NO CHARGE] .	0.00	2.50	0.00	
TAD	L510	A108	Communicate (other external) - E-mails (11) from and to Jake Howlett and Erica Shell, Counsel for Grosse Pointe Park re: Motion to Reassign and Consolidate, edits, concerns, and documents needed for review and Exhibits.	285.00	0.90	256.50	
TAD	L510	A108	Communicate (other external) - E-mails (3) from and to Debra Walling and Frank Schulte re: Motion to Reassign to Judge Allen and Counter-Claim timing.	285.00	0.10	28.50	
04/08/2022	TAD	L510	A108	Communicate (other external) - Telephone calls (3) with Grosse Pointe Park's Counsel re: Reassignment and Consolidation.	285.00	0.40	114.00
TAD	L510	A108	Communicate (other external) - Telephone call with Counsel for USSIC re: agreement to stipulate to Reassignment of our case to Judge Allen.	285.00	0.20	57.00	
TAD	L510	A108	Communicate (other external) - E-mail to Defense Team re: USSIC's stipulation to Reassignment to Judge Allen.	285.00	0.10	28.50	
TAD	L510	A108	Communicate (other external) - E-mail to				

USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
				Jonathan Walton, Counsel for USSIC re: Stipulation to Reassign Case.	285.00	0.10	28.50
04/09/2022	TAD	L510	A103	Draft/revise proposed Stipulated Orders to Reassign and Consolidate - Distribute to Counsel of Record (Saturday work).	285.00	0.80	228.00
	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Jake Howlett, Counsel for Grosse Pointe Park re: intervention by Ven Johnson's firm (Saturday work).	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise Letter to Defense Team (lengthy) re: further thoughts on the benefits of Reassignment (Saturday work).	285.00	0.90	256.50
04/11/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Jonathan Walton re: revisions to Stipulation to Reassign Case.	285.00	0.10	28.50
	TAD	L510	A104	Review/analyze revised Stipulated Orders from Counsel for USSIC.	285.00	0.20	57.00
04/14/2022	TAD	L510	A104	Review/analyze USSIC Policy Cancellation and sewer back-up coverage under potential replacement policy.	285.00	3.30	940.50
	EPC	L510	A104	Review/analyze Policy language in preparation of drafting section of Policy Review re: cancellation and preservation of claims.	285.00	1.30	370.50
	EPC	L510	A103	Draft/revise section of Policy Review re: cancellation and preservation of claims.	285.00	1.80	513.00
04/15/2022	EPC	L510	A103	Draft/revise Opinion on the specimen policy from Argo-Trident.	285.00	1.10	313.50
	TAD	L510	A104	Review/analyze and preparation of final analysis of cancellation of USSIC Policy and Sewer Back-up Coverage under the Argo-Trident Policy.	285.00	3.50	997.50
	TAD	L510	A108	Communicate (other external) - E-mail to Defense Team with Analysis of Cancellation of USSIC Policy and replacement with Argo-Trident Policy.	285.00	0.10	28.50
04/18/2022	TAD	L510	A104	Review/analyze proposed Answer from Grosse Pointe Park.	285.00	0.60	171.00
	TAD	L510	A104	Review/analyze potential replacement policy re: Query: What type of deductible is provided?	285.00	0.40	114.00

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				<u>Rate</u>	<u>Hours</u>		
	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Debra Walling re: analysis of Argo-Trident Policy - Clarification on "per occurrence" vs. "per claimant".	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mail from Debra Walling to John Johnson at Nickel & Saph Insurance Agency re: clarification on "per occurrence" vs. "per claimant".	285.00	0.10	28.50
04/19/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) from John Johnson at Nickel Saph and Debra Walling re: Limited Pollution Liability Coverage and Pollution Coverage within the Tank Policy is "per occurrence".	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - Telephone call with Mr. Johnson of Nickel Saph and Mr. Conn re: clarification of terms "per occurrence" or "per claimant" and particulars of specimen Argo-Trident Policy under review by Grosse Pointe Woods.	285.00	0.30	85.50
	EPC	L510	A108	Communicate (other external) - Telephone call with Mr. Johnson of Nickel Saph and Mr. Diemer re: clarification of terms "per occurrence" or "per claimant" and particulars of specimen Argo-Trident Policy under review by Grosse Pointe Woods.	285.00	0.30	85.50
	TAD	L510	A103	Draft/revise Letter to Defense Team and Mr. Johnson re: conversation with Mr. Johnson to confirm deductible is "per occurrence".	285.00	0.20	57.00
	TAD	L510	A108	Communicate (other external) - E-mail from Frank Schulte to Jeffrey DesRosiers and Patrick Nelson at Tokio Marine re: Notice of Cancellation of Policies.	285.00	0.10	28.50
04/20/2022	TAD	L510	A101	Plan and prepare for Status Conference - Analyze file materials.	285.00	0.40	114.00
	TAD	L510	A109	Appear for/attend Status Conference with Judge Allen.	285.00	0.40	114.00
	TAD	L510	A103	Draft/revise Letter to Defense Team (lengthy) re: Status Conference with Judge Allen.	285.00	0.60	171.00
	TAD	L510	A108	Communicate (other external) - Telephone call with Erica Shell, Counsel for Grosse Pointe Park re: Discovery in the coverage case.	285.00	0.30	85.50

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					<u>Rate</u>	<u>Hours</u>	
04/21/2022	TAD	L510	A108	Communicate (other external) - Telephone call with Class Counsel Mr. Doherty and Mr. Conn re: discovery in the underlying cases.	285.00	0.20	57.00
	EPC	L510	A108	Communicate (other external) - Telephone call with Mr. Doherty and Mr. Diemer re: discovery in the underlying cases.	285.00	0.20	57.00
	TAD	L510	A108	Communicate (other external) - Telephone call with Counsel for Grosse Pointe Park and Mr. Conn re: Conference with Counsel for USSIC.	285.00	0.20	57.00
	EPC	L510	A108	Communicate (other external) - Telephone call with Counsel for Grosse Pointe Park and Mr. Diemer re: Conference with Counsel for USSIC.	285.00	0.20	57.00
	TAD	L510	A109	Appear for/attend Video Conference with Counsel for USSIC and Counsel for Grosse Pointe Park.	285.00	0.60	171.00
	EPC	L510	A109	Appear for/attend Video Conference with Counsel for USSIC and Counsel for Grosse Pointe Park.	285.00	0.60	171.00
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Conn re: written discovery to USSIC, payment of defense costs to McGraw Morris, and Dispositive Motion Briefing Schedule.	285.00	0.40	114.00
	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer re: written discovery to USSIC, payment of defense costs to McGraw Morris, and Dispositive Motion Briefing Schedule.	285.00	0.40	114.00
	EPC	L510	A103	Draft/revise Discovery Requests and supporting legal research.	285.00	1.00	285.00
	TAD	L510	A103	Draft/revise proposed Scheduling Order per Court's instruction - Forward to all Counsel for review.	285.00	0.30	85.50
	TAD	L510	A108	Communicate (other external) - Telephone call with Debra Walling (lengthy) re: updates on the coverage case.	285.00	0.50	142.50
	TAD	L510	A108	Communicate (other external) - E-mails (3) to and from Defense Team (lengthy) re: outcome of calls with Opposing Counsel and Counsel for Grosse Pointe Park.	285.00	0.30	85.50
04/22/2022	TAD	L510	A108	Communicate (other external) - E-mails (4) to and from all Counsel to Grosse Pointe Woods and Grosse Pointe Park matters re: Proposed Scheduling Order for Consolidated Cases.	285.00	0.20	57.00

				<u>Rate</u>	<u>Hours</u>		
	TAD	L510	A108	Communicate (other external) - E-mail from Frank Schulte re: McGraw Morris invoices.	285.00	0.10	28.50
04/25/2022	EPC	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Mr. Conn re: Scheduling Order, Discovery, and Discovery strategy.	285.00	0.30	85.50
	TAD	L510	A105	Communicate (in firm) - Conference with Mr. Diemer and Mr. Conn re: Scheduling Order, Discovery, and Discovery strategy.	285.00	0.30	85.50
	TAD	L510	A103	Draft/revise Letter to opposing Counsel re: language of Scheduling Order.	285.00	0.30	85.50
	TAD	L510	A108	Communicate (other external) - E-mail to Defense Team (lengthy) re: Insurance Coverage Litigation Update.	285.00	0.20	57.00
04/26/2022	TAD	L510	A103	Draft/revise Scheduling Orders (final drafts for filing).	285.00	0.30	85.50
	TAD	L510	A108	Communicate (other external) - E-mails (5) to and from Counsel in GPW and GPP matters re: Consolidation Order.	285.00	0.10	28.50
				For Current Services Rendered		<u>53.50</u>	<u>9,804.00</u>
	Total Fees and Costs:						9,804.00
	Previous Balance						\$17,073.55
	<u>Payments</u>						
04/30/2022				Payment [5/5/22] - CK#63203 - Thank you!			-17,073.55
	Balance Due						<u>\$9,804.00</u>

Billing History			
<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
67,060.50	87.55	0.00	57,344.05

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
L510	Appellate Motions and Submissions	9804.00	0.00
L500	Appeal	9,804.00	0.00

592536812,000

Please Remit \$9,804.00

SM 5/31/2022

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Final Statement Run Totals 05/23/2022

Statements Printed:	1
Hours:	53.50
Fees:	9,804.00