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Tax I.D. 38-3510534

Page: 1  
February 18, 2022  
Claim No: JPJPC-20222Q  
Statement No: 2

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

USSIC v City of Grosse Pointe Woods

**For Professional Services through : 01/31/2022**

					<u>Rate</u>	<u>Hours</u>	
01/02/2022	TAD	L510	A103	Draft/revise Interview Outline - Identify list of questions to ask Robert Bucko at his upcoming interview re: "per claimant" deductible language (Sunday work).	285.00	0.50	142.50
01/03/2022	TAD	L510	A108	Communicate (other external) - E-mail to opposing Counsel re: "defense arrangement", payment of invoices for McGraw Morris, and status of filing of Complaint in Wayne Circuit Court.	285.00	0.10	28.50
01/04/2022	TAD	L520	A108	Communicate (other external) - Telephone call with Debra Walling, new City Attorney for Grosse Pointe Woods re: getting her up-to-speed on coverage issues, including payment of defense costs by USSIC to McGraw Morris.	285.00	0.80	228.00
01/05/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Jonathan Walton, Counsel for USSIC with file-stamped Complaint - Average lag time of 14 days between filing and acceptance by Wayne Circuit Clerk.	285.00	0.10	28.50
	TAD	L510	A104	Review/analyze time-stamped State Court Complaint - Compare Complaint to the one filed in Federal Court to confirm coverage disputes are identical - Analyze and distribute to Ms. Walling.	285.00	0.90	256.50
01/06/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) to and from Debra Walling with Complaint for review.	285.00	0.10	28.50
01/07/2022	TAD	L510	A108	Communicate (other external) - Telephone call with Debra Walling re: Answer to the Complaint.	285.00	0.20	57.00
01/08/2022	TAD	L510	A104	Review/analyze Complaint filed by USSIC and			

## USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
				Class Action Complaint (Saturday work).	285.00	1.40	399.00
	TAD	L510	A104	Review/analyze Complaint - Begin preparation of Answer (Saturday work).	285.00	0.50	142.50
01/10/2022	TAD	L510	A108	Communicate (other external) - E-mail to Defense Team re: USSIC has re-filed the Complaint in State Court, expect service in the near future.	285.00	0.10	28.50
01/11/2022	TAD	L510	A108	Communicate (other external) - E-mail from Debra Walling re: City Council request for Case Analysis.	285.00	0.10	28.50
01/12/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) to and from Debra Walling re: Case Analysis and potential Counter-Claim against USSIC for Grosse Pointe Woods' property damage claim - Reservation of Rights and Insurance Claim.	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise Insurance Coverage Analysis.	285.00	0.50	142.50
01/14/2022	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Debra Walling re: City's request to seek quotes from new insurers and potential impact on current litigation.	285.00	0.30	85.50
	TAD	L510	A103	Draft/revise Insurance Coverage Analysis (continued) - Identify controlling portions of the Insurance Policy.	285.00	1.80	513.00
01/15/2022	EPC	L510	A104	Review/analyze Insurance Policy, Endorsements, Limitations, and Definitions in preparation of Coverage Analysis (Saturday work).	285.00	1.70	484.50
01/16/2022	TAD	L510	A103	Draft/revise Insurance Coverage Analysis (continued) - Analyze and summarize the Complaint regarding the June storm event (Sunday work).	285.00	1.70	484.50
01/17/2022	TAD	L510	A108	Communicate (other external) - Telephone call with Counsel for Class Action Claimants re: storm event - allegations in their Complaint, and request for copy of the Complaint.	285.00	0.30	85.50
01/18/2022	EPC	L510	A104	Review/analyze underlying Complaint in preparation of Coverage Analysis.	285.00	0.60	171.00
01/19/2022	EPC	L510	A104	Review/analyze, plan, and prepare to draft our Interim Report per request of client.	285.00	0.60	171.00
	TAD	L510	A108	Communicate (other external) - E-mails (3) to			

## USSIC v City of Grosse Pointe Woods

					<u>Rate</u>	<u>Hours</u>	
				and from Christopher Desmond re: no claims in his office's Class Action complaints against Grosse Pointe Woods.	285.00	0.10	28.50
	TAD	L510	A108	Communicate (other external) - E-mails (2) from and to Debra Walling re: City Council's request for analysis - Our Insurance Coverage Analysis.	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise Insurance Coverage Analysis (continued).	285.00	0.90	256.50
01/20/2022	EPC	L510	A103	Draft/revise Interim Report and Litigation Plan (finalize).	285.00	3.00	855.00
	TAD	L510	A103	Draft/revise Litigation Plan - Forward to Ms. Walling and Mr. Schulte.	285.00	3.00	855.00
01/21/2022	EPC	L510	A104	Review/analyze claims made in the Complaint, elements of claims, definitions contained with the GTLA, and application to pertinent policy provisions in preparation of drafting Coverage Analysis.	285.00	2.60	741.00
	EPC	L510	A103	Draft/revise Coverage Analysis (begun) - Draft sections re: factual allegations made in the Complaint, claims made by Plaintiff, and the elements necessary for Plaintiff to prevail.	285.00	4.10	1,168.50
	TAD	L510	A108	Communicate (other external) - E-mails (2) to Debra Walling and counsel for USSIC re: payment of McGraw Morris invoices.	285.00	0.10	28.50
	TAD	L510	A103	Draft/revise Coverage Analysis (continued) - Definition of "claimant" for deductible issue.	285.00	1.20	342.00
01/26/2022	EPC	L510	A103	Draft/revise Coverage Analysis (continued) - Begin section re: Count I of USSIC's Complaint.	285.00	3.70	1,054.50
	TAD	L510	A103	Draft/revise Coverage Analysis (continued) - Pollution Exclusion.	285.00	1.00	285.00
01/27/2022	EPC	L510	A103	Draft/revise Coverage Analysis (continued) - Count I of USSIC's Complaint.	285.00	6.10	1,738.50
	TAD	L510	A103	Draft/revise Coverage Analysis (continued) - "per claimant" deductible issue.	285.00	2.00	570.00
01/30/2022	EPC	L510	A104	Review/analyze Count II of USSIC's Complaint for Coverage Analysis (Sunday work).	285.00	2.40	684.00
01/31/2022	EPC	L510	A103	Draft/revise Coverage Analysis (continued) - Count II of USSIC's Complaint.	285.00	7.20	2,052.00

	<u>Rate</u>	<u>Hours</u>	
TAD L510 A103 Draft/revise Coverage Analysis (continued) - \$5,000 "per claimant" deductible issue.	285.00	1.00	285.00
For Current Services Rendered		50.90	14,506.50
<b>Total Fees and Costs:</b>			14,506.50
Previous Balance			\$13,965.00

Payments

01/13/2022 Payment - CK#62343 - Thank you! -13,965.00

**Balance Due** \$14,506.50

Billing History			
<u>Fees</u>	<u>Expenses</u>	<u>Finance Charge</u>	<u>Payments</u>
28,471.50	0.00	0.00	13,965.00

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
L510 Appellate Motions and Submissions	14278.50	0.00
L520 Appellate Briefs	228.00	0.00
L500 Appeal	14,506.50	0.00

Please Remit \$14,506.50

592,536,812.00

Sm 2/22/2022

FS. 2-22-22

Final Statement Run Totals 02/18/2022

Statements Printed:	1
Hours:	50.90
Fees:	14,506.50