

Summit Risk Services

Page: 3
December 07, 2018
Client No.: 3478-054

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

TOTAL CURRENT WORK 1,600.00

PREVIOUS BALANCE \$352.00

TOTAL STATEMENT \$1,952.00

Aged Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
1,952.00	0.00	0.00	0.00	0.00	0.00



Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

January 8, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Att: Victor Polce

Re: Insured: Borough of Wallington
Claimant: Fehl, Joseph
Policy No: QJP0102602
Claim No.: QM-1030

Dear Mr. Polce,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's retention and coinsurance obligations to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Ryan Thomas, at 215-443-3517 or thomas@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Ryan Thomas

cc: Paul Barbire
South Bergen JIF Fund Attorney

Retention and Coinsurance Invoice (1)

Payment Due Date: 2/8/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	1/8/19
Claim Number:	QM-1030
Claimant:	Fehl, Joseph
Policy #:	QJP0102602

Policy Retention/Coinsurance Amount	Total Invoice Amount Paid	Retention Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$ 304.00 \$ 598.61 \$ 612.00 \$ 360.75 \$1,828.50 \$ 720.00 \$ 480.00	<u>\$4,903.86</u>

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Ryan Thomas

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

May 01, 2018

Invoice No. 938

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered from 1/1/2018 Through 4/30/2018.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
4/10/2018	MM	review file in preparation for drafting answer	0.70	\$112.00
4/10/2018	MM	draft file and serve answer	1.10	\$176.00
4/10/2018	DP	preparation of Initial Fee Budget	0.30	\$48.00
4/11/2018	DP	Receipt and review text order from Court regarding Rule 16 conference	0.10	\$16.00
4/11/2018	DP	Correspondence to Company regarding status/Rule 16 conference	0.20	\$32.00
4/11/2018	DP	Receipt and review email from Court regarding Judge's procedural requirements	0.10	\$16.00
4/11/2018	MM	review correspondence from Court re: answer	0.10	\$16.00
4/16/2018	JB	Review of file in preparation of drafting memos of chronology, persons of interest and causes of action	0.50	\$70.00
4/16/2018	JB	Draft and prepare memo re: chronology	0.40	\$56.00
4/16/2018	JB	Draft and prepare memo re: persons of interest	0.30	\$42.00
4/16/2018	JB	Draft and prepare memo re: causes of action	0.30	\$42.00
4/16/2018	JB	Draft and prepare interrogatories to Plaintiff	1.10	\$154.00
4/16/2018	JB	Draft and prepare notice to produce to Plaintiff	0.70	\$98.00

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Client Number: 20972024
Matter Number: 4788

5/1/2018
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4/16/2018	JB	Draft and prepare Rule 26 disclosure	0.70	\$98.00
4/18/2018	DP	Telephone conference with company regarding assignment/defense	0.20	\$32.00
4/18/2018	DP	Telephone conference with company regarding defense of individual defendants	0.10	\$16.00
4/23/2018	MM	review file in preparation for drafting initial letter/evaluation to the company	0.50	\$80.00
4/23/2018	MM	draft initial evaluation letter to company	0.40	\$64.00
4/26/2018	DP	Receipt and review e-mail from company re: WC claim	0.10	\$16.00
4/26/2018	DP	E-mail to company re: WC claim/prior trial	0.10	\$16.00
4/26/2018	DP	Receipt and review e-mail from company re: criminal trial	0.10	\$16.00

Billable Hours / Fees: 8.10 \$1,216.00

Timekeeper Summary

Timekeeper JB worked 4.00 hours at \$140.00 per hour, totaling \$560.00.

Timekeeper MM worked 2.80 hours at \$160.00 per hour, totaling \$448.00.

Timekeeper DP worked 1.30 hours at \$160.00 per hour, totaling \$208.00.

Current Invoice Summary

Prior Balance:	\$0.00
Payments Received:	\$0.00
Unpaid Prior Balance:	<u>\$0.00</u>
Current Fees:	\$1,216.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	<u><u>\$1,216.00</u></u>

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

June 04, 2018

Invoice No. 1010

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 5/31/2018.

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/7/2018	DP	receipt and review of filed Answer from the Court	0.10	\$16.00
5/9/2018	DB	telephone conference with Borough Clerk re: defense/strategy meeting	0.20	\$15.00
5/9/2018	MM	correspondence to borough clerk re: defense/strategy meeting	0.20	\$32.00
5/9/2018	DB	telephone conference with Captain Kudlacik re: defense/strategy meeting	0.20	\$15.00
5/10/2018	JB	Review local rules relevant to scheduling order and upcoming pretrial conference.	0.10	\$14.00
5/10/2018	JB	Prepare for telephone conference with Plaintiff's counsel re: proposed scheduling order.	0.30	\$42.00
5/10/2018	JB	First telephone conference with Plaintiff's attorney's office re: scheduling order	0.10	\$14.00
5/10/2018	JB	Second telephone conference with Plaintiff's attorney re: scheduling order	0.20	\$28.00
5/11/2018	MM	attendance at meeting with clients re: discovery/future handling	2.40	\$384.00
5/11/2018	MM	Preparation for meeting with clients	0.50	\$80.00

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Client Number: 20972024
Matter Number: 4788

5/11/2018	JB	Receive first email correspondence from plaintiff's attorney re: proposed scheduling order.	0.10	\$14.00
5/11/2018	JB	Respond to first email correspondence from plaintiff's attorney re: proposed scheduling order.	0.10	\$14.00
5/11/2018	MM	telephone conference with Bergen Risk re: workers comp file	0.20	\$32.00
5/11/2018	MM	draft file and serve subpoena on Bergen Risk re: workers comp file	0.40	\$64.00
5/11/2018	MM	draft file and serve subpoena on Bergen County Prosecutors re: criminal case	0.40	\$64.00
5/11/2018	MM	draft memo summary of meeting/future handling	0.30	\$48.00
5/11/2018	DP	Preparation for client meeting	0.50	\$80.00
5/11/2018	DP	Attendance at meeting with client/Det. Kudlacik	2.40	\$384.00
5/11/2018	JB	Receive second email correspondence from plaintiff's attorney re: proposed scheduling order.	0.10	\$14.00
5/11/2018	JB	Respond to second email correspondence from plaintiff's attorney re: proposed scheduling order.	0.10	\$14.00
5/11/2018	MM	draft defense statement for joint discovery submission	0.30	\$48.00
5/11/2018	JB	Third email correspondence to plaintiff's attorney re: proposed scheduling order.	0.10	\$14.00
5/14/2018	MM	review federal website re: research re: client's affirmative suit for retaliation	0.30	\$48.00
5/14/2018	MM	review and analyze Baginsky's complaint against Wallington	0.30	\$48.00
5/14/2018	MM	review correspondence from plaintiff re: joint discovery plan	0.10	\$16.00
5/15/2018	JB	Receipt and review of email correspondence from Plaintiff's attorney re: scheduling order.	0.10	\$14.00
5/15/2018	JB	Receipt and review of email attachment from Plaintiff's counsel.	0.20	\$28.00
5/15/2018	MM	draft/revise joint discovery plan in final form	0.20	\$32.00
5/15/2018	MM	draft email to plaintiff re: final joint discovery plan	0.10	\$16.00
5/15/2018	MM	review correspondence from plaintiff re: filed joint discovery plan	0.10	\$16.00
5/16/2018	DP	Preparation for case conference	0.30	\$48.00

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Client Number: 20972024
Matter Number: 4788

6/4/2018
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5/16/2018	JB	Receipt and review of email correspondence from Plaintiff's attorney re: scheduling order.	0.10	\$14.00
5/16/2018	MM	review correspondence from plaintiff re: filing	0.10	\$16.00
5/16/2018	DP	Attendance at initial case conference before Judge Waldor	2.90	\$464.00
5/16/2018	DB	telephone conference with Guaranteed Subpoena re: service of subpoenas	0.20	\$15.00
5/16/2018	DP	Correspondence to company regarding status/initial conference	0.30	\$48.00
5/16/2018	DP	Receipt and review Minute Entry from court regarding conference	0.10	\$16.00
5/16/2018	DP	Receipt and review email order from court regarding follow-up pretrial conference	0.10	\$16.00
5/17/2018	MM	review correspondence from guaranteed subpoena re: proof of service on BCPO	0.10	\$16.00
5/18/2018	DP	Receipt and review proof of service re: Bergen Risk subpoena	0.10	\$16.00
5/18/2018	DP	Receipt and review process order from Guaranteed Subpoena re: Bergen Risk	0.10	\$16.00
5/23/2018	MM	review correspondence from Bergen Risk re: subpoena	0.10	\$16.00

Billable Hours / Fees: 15.20 \$2,349.00

Timekeeper Summary

Timekeeper DP worked 6.90 hours at \$160.00 per hour, totaling \$1,104.00.
Timekeeper MM worked 6.10 hours at \$160.00 per hour, totaling \$976.00.
Timekeeper JB worked 1.60 hours at \$140.00 per hour, totaling \$224.00.
Timekeeper DB worked 0.60 hours at \$75.00 per hour, totaling \$45.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
5/16/2018	parking fees at Federal Courthouse in Newark for initial Rule 16 conference	\$20.00	
5/17/2018	Local travel to Federal Courthouse for Rule 16 disclosure	\$25.44	
	Total Costs	\$45.44	

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Matter Number: 4788

6/4/2018
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Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/16/2018	Check Number - 55948 against Inv# 938	(\$912.00)
Total Payments Received:		(\$912.00)

Current Invoice Summary

Prior Balance:	\$1,216.00	
Payments Received:	(\$912.00)	Last Payment: 5/16/2018
Unpaid Prior Balance:	\$304.00	
Current Fees:	\$2,349.00	
Advanced Costs:	\$45.44	
TOTAL AMOUNT DUE:	\$2,698.44	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

July 03, 2018
Invoice No. 1084

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.
Claim Number: QM-1030
File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 6/30/2018.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/12/2018	MM	draft/revise discovery demands and Rule 26 disclosures in final form	0.60	\$96.00
6/12/2018	MM	Revise and finalize our responses to Plaintiff's discovery demands and our Rule 26 disclosure for mailing.	0.20	\$32.00
6/14/2018	MM	review correspondence from court re: summons and complaint BCPO	0.10	\$16.00
6/14/2018	DP	Receipt and review e-mail from Court re: affidavit of service	0.10	\$16.00
6/26/2018	JB	Review subpoenaed workers' compensation file for Plaintiff	0.80	\$112.00
6/26/2018	JB	Draft summary of subpoenaed documents to company	0.50	\$70.00
6/27/2018	DP	Receipt and review plaintiff's Rule 26 disclosure	0.20	\$32.00
6/29/2018	JB	Review file in preparation of drafting initial 90 day litigation report.	0.60	\$84.00
6/29/2018	JB	Access PACER for case status and scheduling order	0.10	\$14.00
6/29/2018	JB	Draft initial 90 day litigation report.	1.00	\$140.00

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Client Number: 20972024
Matter Number: 4788

7/3/2018
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Billable Hours / Fees: 4.20 \$612.00

Timekeeper Summary

Timekeeper JB worked 3.00 hours at \$140.00 per hour, totaling \$420.00.

Timekeeper DP worked 0.30 hours at \$160.00 per hour, totaling \$48.00.

Timekeeper MM worked 0.90 hours at \$160.00 per hour, totaling \$144.00.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/14/2018	Check Number - 56141 against Inv# 1010	(\$1,761.75)
6/14/2018	Check Number - 56141 against Inv# 1010	(\$34.08)
Total Payments Received:		(\$1,795.83)

Current Invoice Summary

Prior Balance:	\$2,698.44	
Payments Received:	(\$1,795.83)	Last Payment: 6/14/2018
Unpaid Prior Balance:	\$902.61	
Current Fees:	\$612.00	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	<u>\$1,514.61</u>	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

3166.83
Pfund McDonnell, P.C.
 139 Prospect Street
 2nd Floor
 Ridgewood, NJ 07450
 Telephone: 201-857-5040
 Fax: 201-857-5041
 Tax ID # 27-3179634

August 02, 2018
 Invoice No. 1169

Summit Risk Services
 Ryan Thomas
 120 Gibraltar Road, Suite 210
 CC: JOHN MARKEL
 Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
 System ID: 4788 Fehl v. Borough of Wallington, et al.
 Claim Number: QM-1030
 File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
 For Services Rendered Through 7/31/2018.

			Fees	Hours	Amount
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>			
7/12/2018	JB	Update draft of initial 90 day litigation report.		0.20	\$28.00
7/12/2018	JB	Review file re: status update		0.20	\$28.00
7/12/2018	JB	Access eCourts case jacket re: case status		0.10	\$14.00
7/13/2018	JB	Draft and prepare letter to client (Baginski) re: file status update		0.20	\$28.00
7/13/2018	JB	Draft and prepare letter to company re: file status update		0.20	\$28.00
7/13/2018	JB	Draft and prepare letter to client (Kudlacik) re: file status update		0.20	\$28.00
7/13/2018	JB	Receipt and review interrogatories from Plaintiff as to Borough of Wallington		0.20	\$28.00
7/13/2018	JB	Receipt and review interrogatories from Plaintiff as to Witold Baginski		0.20	\$28.00
7/13/2018	JB	Receipt and review interrogatories from Plaintiff as to Sean Kudlacik		0.20	\$28.00
7/13/2018	JB	Receipt and review Plaintiff's Notice to Produce		0.20	\$28.00
7/13/2018	JB	Receipt and review Plaintiff's Demand for Insurance Information		0.10	\$14.00

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7/13/2018	JB	Begin drafting and preparing answers to interrogatories on behalf of client Borough of Wallington.	0.40	\$56.00
7/13/2018	JB	Begin drafting and preparing answers to interrogatories on behalf of client Witold Baginski.	0.40	\$56.00
7/13/2018	JB	Draft and prepare response to Plaintiffs demand for production of insurance agreement.	0.20	\$28.00
7/13/2018	MM	review correspondence from Court re: discovery order	0.10	\$16.00
7/16/2018	DB	telephone conference with Captain Kulacik and Borough Administrator re: meeting to discuss discovery responses	0.20	\$15.00
7/16/2018	JB	Begin drafting and preparing answers to interrogatories on behalf of client Sean Kudlacik.	0.40	\$56.00
7/16/2018	JB	Begin drafting and preparing answers to notice to produce on behalf of all clients.	0.40	\$56.00
7/16/2018	MM	review text order from court permitting defendant Bergen County Prosecutor's office to file motion to dismiss	0.10	\$16.00
7/23/2018	MM	draft email to company re: potential conflict representing party	0.20	\$32.00
7/23/2018	MM	telephone conference with client re: status/future handling	0.20	\$32.00
7/23/2018	MM	draft email to client re: motion to dismiss	0.20	\$32.00
7/23/2018	MM	telephone conference with Mayor re: interview	0.10	\$16.00
7/23/2018	MM	telephone conference with client re: potential conflict of interest	0.10	\$16.00
7/24/2018	MM	preparation for meeting with client re: discovery responses	0.50	\$80.00
7/24/2018	MM	attendance at meeting with client re: discovery responses	1.50	\$240.00
7/24/2018	DP	E-mail from court re: Prosecutor's motion	0.10	\$16.00
7/25/2018	JB	Revise answers to client's (Kudlacik) answers to Plaintiffs interrogatories based on today's meeting.	0.50	\$70.00
7/25/2018	JB	Review content of documents provided by client (Kudlacik) at yesterday's meeting	0.50	\$70.00
7/25/2018	JB	Update memo re: chronology based on documents provided by client (Kudlacik) at yesterday's meeting	0.20	\$28.00
7/25/2018	MM	telephone conference with codefendant re: BCPO subpoena	0.20	\$32.00

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Client Number: 20972024
Matter Number: 4788

8/2/2018
Page: 3

7/25/2018 MM
7/25/2018 DP

draft/revise litigation report in final form
Receipt and review e-mail notice from Court re:
co-def's motion

0.40 \$64.00
0.10 \$16.00

Billable Hours / Fees: 9.00 \$1,323.00

Timekeeper Summary

Timekeeper JB worked 5.00 hours at \$140.00 per hour, totaling \$700.00.
Timekeeper MM worked 3.60 hours at \$160.00 per hour, totaling \$576.00.
Timekeeper DB worked 0.20 hours at \$75.00 per hour, totaling \$15.00.
Timekeeper DP worked 0.20 hours at \$160.00 per hour, totaling \$32.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
7/11/2018	Service of Process - subpoenas to Bergen County prosecutor & Bergen Risk Mgmt	\$119.98	
	Total Costs	\$119.98	

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/12/2018	Check Number - 56341 against Inv# 1084	(\$459.00)
	Total Payments Received:	(\$459.00)

Current Invoice Summary

Prior Balance:	\$1,514.61
Payments Received:	(\$459.00)
Unpaid Prior Balance:	\$1,055.61
Current Fees:	\$1,323.00
Advanced Costs:	\$119.98
TOTAL AMOUNT DUE:	\$2,498.59

Last Payment: 7/12/2018

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Page: 1
September 06, 2018
Client No.: 3478-054

Attn: Ryan R. Thomas

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter

Fees

Hours

08/15/18	
CCB Telephone conference with Mr. Thomas re: new assignment	0.20
08/16/18	
DLM Intake; prepare physical and billing files; research Borough website; prepare contact list	0.70
CCB Receipt and analysis of file assignment from Mr. Thomas; analysis of Complaint; prepare memo to file; research re: plaintiff's history with Borough and background; review online docket; review Motion to Dismiss filed by BC Prosecutor's Office	2.80
08/17/18	
CCB Prepare Substitution of Attorney and Notice of Appearance on behalf of Vic Baginski; prepare memo to Ms. McDonnell,	

Re: Wallington adv. Fehl
 Case # 2:17-CV-11462-KSH-CLW
 Claim # QM-1030
 Tax Id. # 26-2748605

	Hours	
Esq.	0.70	
08/20/18		
CCB Receipt and analysis of memo from Ms. McDonnell, Esq., re: status; memo to file; revise and file Substitution of Attorney	0.60	
08/21/18		
CCB Receipt and analysis of Court notice, re: conference call with Court; memo to file	0.50	
08/22/18		
NRA Status Telephone conference with Court; Memo to file	0.80	
CCB Receipt and analysis of Scheduling Order; review discovery demands from plaintiff to defendant Baginski; memo to file	0.80	
08/23/18		
CCB Receipt and analysis of Order from Court, re: next Court Conference; memo to file; attention to status	0.40	
CCB Telephone conference with Mr. Baginski, re: representation and status; memo to Mr. Baginski; memo to file	0.80	
08/29/18		
CCB Prepare for and attend meeting with Wallington Clerk Vic Baginski at Wallington Borough Hall	3.00	
08/30/18		
CCB Receipt and analysis of Mr. Baginski's draft answers to plaintiff's Interrogatories; notes to file	0.50	
TOTAL CURRENT FEES	11.80	1,828.50

<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Senior Partner	10.30	\$160.00	\$1,648.00
Partner	0.80	160.00	128.00

Summit Risk Services

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September 06, 2018
Client No.: 3478-054

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

Paralegal	0.70	75.00	52.50
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TOTAL CURRENT WORK			1,828.50
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TOTAL STATEMENT			<u>\$1,828.50</u>
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Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

October 01, 2018

Invoice No. 1296

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
CC: JOHN MARKEL
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 9/30/2018.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
9/4/2018	DP	Receipt and review email from Court regarding substitution of attorney	0.10	\$16.00
9/4/2018	DP	Receipt and review email notice from court regarding motion deadlines	0.10	\$16.00
9/4/2018	DP	Receipt and review email minute entry from court re: conference	0.10	\$16.00
9/4/2018	DP	Receipt and review email text order from Court re: next conference	0.10	\$16.00
9/10/2018	DP	Review file re: outstanding discovery	0.20	\$32.00
9/10/2018	DP	Draft follow up ltr to Plaintiff re: outstanding discovery	0.20	\$32.00
9/10/2018	JB	Telephone conference with counsel for co-defendant Bergen County Prosecutor's Office re: outstanding subpoena documents.	0.10	\$14.00
9/10/2018	JB	Draft and prepare notice to produce to co-defendant Bergen County Prosecutor's Office	0.40	\$56.00
9/11/2018	JB	Telephone conference with client (Captain Kudlacik) re: outstanding discovery	0.10	\$14.00

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Client Number: 20972024
Matter Number: 4788

10/1/2018
Page: 2

9/11/2018	JB	Email correspondence to client (Captain Kudlacik) re: outstanding discovery	0.10	\$14.00
9/11/2018	JB	Second telephone conference with client (Captain Kudlacik) re: outstanding discovery	0.10	\$14.00
9/11/2018	JB	Receipt and review email correspondence from client (Captain Kudlacik) re: outstanding discovery	0.10	\$14.00
9/11/2018	MM	review file re: Borough's answers	0.20	\$32.00
9/11/2018	MM	telephone conference with Borough Administrator re: discovery/status	0.30	\$48.00
9/11/2018	MM	draft letter to client updating on overview of matter, status of discovery and future handling	0.30	\$48.00
9/11/2018	MM	draft/revise interrogatories on behalf of Borough	0.70	\$112.00
9/11/2018	JB	Receipt and review second email correspondence from client (Captain Kudlacik) re: outstanding discovery	0.10	\$14.00
9/11/2018	JB	Review and finalize client (Kudlacik's) answers to Plaintiff's interrogatories.	0.20	\$28.00
9/11/2018	JB	Second email correspondence to client (Captain Kudlacik) re: outstanding discovery	0.10	\$14.00
9/11/2018	MM	draft/revise responses to NTP on behalf of Borough	0.50	\$80.00
9/11/2018	MM	draft correspondence to Borough Administrator re: answers to interrogatories and NTP	0.30	\$48.00
9/12/2018	JB	Receipt and review email correspondence from client (Kudlacik) re: answers to Plaintiff's interrogatories	0.10	\$14.00
9/20/2018	JB	Telephone conference with Borough Administrator re: discovery	0.10	\$14.00
9/24/2018	JB	follow-up telephone conference with Borough Administrator re: outstanding discovery	0.10	\$14.00
Billable Hours / Fees:			4.70	\$720.00

Timekeeper Summary

Timekeeper JB worked 1.60 hours at \$140.00 per hour, totaling \$224.00.

Timekeeper MM worked 2.30 hours at \$160.00 per hour, totaling \$368.00.

Timekeeper DP worked 0.80 hours at \$160.00 per hour, totaling \$128.00.

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

10/1/2018
Page: 3

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
9/21/2018	Check Number - 56825 against Inv# 1228	(\$444.75)
Total Payments Received:		(\$444.75)

Current Invoice Summary

Prior Balance:	\$593.00	
Payments Received:	(\$444.75)	Last Payment: 9/21/2018
Unpaid Prior Balance:	\$148.25	
Current Fees:	\$720.00	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$868.25	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Page: 1
October 09, 2018
Client No.: 3478-054

Attn: Ryan R. Thomas

Re: Wallington adv. Fehl
Case # 2:17-CV-11462-KSH-CLW
Claim # QM-1030
Tax Id. # 26-2748605

FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter

Fees

	Hours	
09/11/18		
CCB Prepare initial Litigation Status Report and initial Fee Budget; memo to client	3.00	
TOTAL CURRENT FEES	3.00	480.00

<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Senior Partner	3.00	\$160.00	\$480.00
TOTAL CURRENT WORK			480.00
PREVIOUS BALANCE			\$1,828.50

Payments

10/09/18 Fee Payment Received - Thank You	-1,828.50
TOTAL STATEMENT	<u><u>\$480.00</u></u>



Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

February 17, 2020

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Att: Hector Olmo

Re: Insured: Borough of Wallington
Claimant: Fehl, Joseph
Policy No: QJP0102602
Claim No.: QM-1030

Dear Mr. Olmo,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's retention and coinsurance obligations to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Michael Halbherr, at 215-443-3599 or halbherr@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Michael Halbherr

cc: Paul Barbire
South Bergen JIF Fund Attorney

Retention and Coinsurance Invoice (4)

Payment Due Date: 3/17/2020

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	2/17/2020
Claim Number:	QM-1030
Claimant:	Fehl, Joseph
Policy #:	QJP0102602

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Retention Reimbursement Payment Due From Borough of Wallington
\$10,000.00/\$20,000.00	\$1,064.75 \$1,130.00 \$ 455.50 \$ 346.63 \$ 221.62 \$1,197.63 \$ 16.00 \$ 64.00 \$ 260.25 \$ 560.75 \$ 903.31 \$6,250.00 \$ 864.93	<u>\$2,706.45</u> <u>Above Amount Includes:</u> \$ 49.22 remainder of the the retention obligation \$2,657.23 due to date on the 20% coinsurance obligation

Payment Summary:

Retention Obligation paid to date by the Borough: \$9,950.78

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Michael Halbherr

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

May 02, 2019

Invoice No. 1887

Fehl v. Borough of Wallington, et al.
Summit Risk Services
Ryan Thomas
CC: JOHN MARKEL
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.
Claim Number: QM-1030
File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 4/30/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
4/4/2019	MM	telephone conference with Borough Administrator re: depositions	0.10	\$16.00
4/4/2019	MM	telephone conference with Borough employee Dorothy Siek re: depositions	0.10	\$16.00
4/4/2019	MM	review email from plaintiff re: discovery demands	0.10	\$16.00
4/4/2019	MM	review correspondence from plaintiff re: second notice to produce	0.10	\$16.00
4/4/2019	MM	review deposition notice of Borough employee Dorothy Siek	0.10	\$16.00
4/4/2019	MM	review deposition notice of codefendant Baginski	0.10	\$16.00
4/4/2019	MM	review second notice to produce to codefendant Baginski	0.10	\$16.00
4/4/2019	JB	Telephone conference with Borough Administrator re: outstanding written discovery.	0.10	\$14.00
4/4/2019	JB	prepare responses to Plaintiff's second notice to produce.	0.40	\$56.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

5/2/2019
Page: 2

4/4/2019	JB	Review file re: outstanding written discovery from Client (Borough).	0.10	\$14.00
4/4/2019	JB	Prepare extended email correspondence to Borough Administrator re: outstanding written discovery and future handling.	0.20	\$28.00
4/4/2019	JB	Telephone conference with Client (Borough) re: outstanding discovery and future handling.	0.10	\$14.00
4/5/2019	MM	telephone conference with Doris' office re: Baginski information	0.20	\$32.00
4/5/2019	MM	draft email to Doris' office re: notice to produce in Baginski case	0.20	\$32.00
4/5/2019	MM	review correspondence from codefendant BCPO re: documents	0.10	\$16.00
4/5/2019	MM	draft correspondence to codefendant BCPO re: documents	0.10	\$16.00
4/5/2019	MM	review correspondence from codefendant Baginski re: depositions	0.10	\$16.00
4/8/2019	DP	Receipt and review e-mail from Court re: Notice of Appearance for Boro	0.10	\$16.00
4/9/2019	EC	Bates stamp and index docs from BCPO 0001-0467	2.30	\$172.50
4/9/2019	JB	Telephone conference with Company re: Plaintiff's written discovery.	0.10	\$14.00
4/9/2019	JB	Second telephone conference with Company re: Plaintiff's written discovery.	0.10	\$14.00
4/9/2019	JB	Receipt and review email from Company re: Plaintiff's written discovery.	0.10	\$14.00
4/9/2019	JB	Prepare email to Company enclosing Plaintiff's answers to interrogatories.	0.10	\$14.00
4/9/2019	JB	Receipt and review second email from Company re: Plaintiff's written discovery.	0.10	\$14.00
4/9/2019	JB	Prepare second email to Company re: depositions.	0.10	\$14.00
4/9/2019	MM	review and analyze records from BCPO	0.60	\$96.00
4/10/2019	MM	continue reviewing documents from BCPO	0.60	\$96.00
4/10/2019	MM	draft/update chronology of events based on records from BCPO	0.70	\$112.00
4/10/2019	MM	draft email to all parties re: trial transcript	0.20	\$32.00
4/10/2019	DP	Telephone conference with Boro Attorney re: notice of appearance	0.10	\$16.00
4/11/2019	JB	Prepare comprehensive binder of criminal investigation of Plaintiff, exhibits relied on by Plaintiff/State, and chronology of events.	3.90	\$546.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

5/2/2019
Page: 3

4/11/2019	JB	Legal research re: discoverability of grand jury minutes in civil cases.	0.70	\$98.00
4/11/2019	JB	Prepare analysis/memo re: discoverability of grand jury minutes in civil cases.	0.20	\$28.00
4/15/2019	MM	review correspondence from plaintiff re: deposition	0.10	\$16.00
4/17/2019	DB	e-mail Captain Kudlacik re: deposition	0.10	\$7.50
4/17/2019	MM	review correspondence from Defendant in Baginski affirmative claim re: document production.	0.10	\$16.00
4/17/2019	MM	draft correspondence to Defendant in Baginski affirmative claim re: document production.	0.10	\$16.00
4/17/2019	MM	review correspondence from plaintiff re: amendment to interrogatories/deposition	0.10	\$16.00
4/17/2019	MM	draft email to all counsel re: proposed date of deposition	0.10	\$16.00
4/17/2019	MM	review correspondence from codefendant re: future handling/discovery	0.10	\$16.00
4/18/2019	DB	prepare voluminous document production re: Baginski affirmative action matter to produce to counsel	0.60	\$45.00
4/18/2019	DB	prepare Defendant Borough's document production to produce to all counsel	0.40	\$30.00
4/18/2019	JB	Review file in preparation of drafting fourth 90 day litigation report to Company.	0.50	\$70.00
4/18/2019	JB	Prepare fourth 90 day litigation report to Company.	0.80	\$112.00
4/18/2019	MM	review/analyze transcript from criminal trial (2 full days)	3.60	\$576.00
4/18/2019	MM	review file status of discovery/prep for conference/future handling	0.30	\$48.00
4/18/2019	MM	draft detailed memo in preparation for case status conference	0.30	\$48.00
4/22/2019	JB	Prepare memorandum/analysis of witness testimony from Plaintiff's criminal trial.	0.60	\$84.00
4/22/2019	DP	Preparation for case conference	0.30	\$48.00
4/22/2019	DP	Attendance at case conference before Magistrate Judge Waldor	2.30	\$368.00
4/23/2019	DB	telephone conference with Court re: case jacket deficiencies/corrections to docket appearances and trial attorney designations	0.30	\$22.50
4/23/2019	MM	review correspondence from Court re: text order response filed	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

5/2/2019
Page: 4

4/24/2019	DP	Receipt and review text order from Court	0.10	\$16.00
4/24/2019	DP	Correspondence to company regarding status/case conference	0.20	\$32.00
4/24/2019	MM	review documents from previous lawsuit in preparation for producing	1.30	\$208.00
4/24/2019	MM	draft email to all counsel re: deposition	0.20	\$32.00
4/25/2019	JB	Revise/supplement 4th 90 day litigation report to Company.	0.30	\$42.00
4/29/2019	MM	prepare document binder with all discovery from Baginski v. Wallington matter	0.40	\$64.00
4/29/2019	MM	review and analyze document production from Borough in Baginski affirmative claim	1.30	\$208.00
4/29/2019	MM	review and analyze document production from Baginski in affirmative claim in response to NTP	2.30	\$368.00
4/30/2019	MM	review correspondence from plaintiff re: discovery	0.10	\$16.00
4/30/2019	MM	draft correspondence to plaintiff re: discovery	0.10	\$16.00
4/30/2019	MM	telephone conference with client re: deposition	0.20	\$32.00
4/30/2019	DB	e-mail Captain Kudlacik re: deposition	0.10	\$7.50
Billable Hours / Fees:			29.70	\$4,259.00

Timekeeper Summary

Timekeeper DP worked 3.10 hours at \$160.00 per hour, totaling \$496.00.

Timekeeper MM worked 14.30 hours at \$160.00 per hour, totaling \$2,288.00.

Timekeeper DB worked 1.50 hours at \$75.00 per hour, totaling \$112.50.

Timekeeper JB worked 8.50 hours at \$140.00 per hour, totaling \$1,190.00.

Timekeeper EC worked 2.30 hours at \$75.00 per hour, totaling \$172.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
4/8/2019	Photocopies - Defendant BCPO's redacted file re: Fehl	\$47.10	
4/18/2019	Copying - Baginski's document production for affirmative action to produce to counsel	\$113.60	
4/18/2019	Copying Defendant Borough's document production to produce to counsel	\$38.50	
4/22/2019	parking fees for status conference at U.S. District Courthouse in	\$9.00	

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

5/2/2019
Page: 5

4/22/2019	Newark Local travel (roundtrip) to U.S. District Court in Newark for status conference	\$25.52
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Total Costs	\$233.72
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Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
4/1/2019	Check Number - 6354 against Inv# 1727	(\$593.00)
4/10/2019	Check Number - 58366 against Inv# 1806	(\$1,149.38)
Total Payments Received:		(\$1,742.38)

Current Invoice Summary

Prior Balance:	\$3,255.26	
Payments Received:	(\$1,742.38)	Last Payment: 4/10/2019
Unpaid Prior Balance:	\$1,512.88	
Current Fees:	\$4,259.00	
Advanced Costs:	\$233.72	
TOTAL AMOUNT DUE:	\$6,005.60	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pay
1064.75

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

July 01, 2019
Invoice No. 2064

Summit Risk Services
Ryan Thomas
CC: JOHN MARKEL
Split - 75% BR / 25% Summit
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.
Claim Number: QM-1030
File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 6/30/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
6/3/2019	JB	Prepare correspondence to Borough Attorney re: combined written discovery responses of all parties.	0.40	\$56.00
6/3/2019	MM	Preparation for deposition of plaintiff	5.20	\$832.00
6/4/2019	EC	Update and revise trial binder and table of contents	0.50	\$37.50
6/4/2019	EC	Update our deposition exhibits binder	0.20	\$15.00
6/4/2019	EC	Continue page line summary of Shawn Kudlacik pages 30-111	1.50	\$112.50
6/4/2019	MM	attendance at deposition of plaintiff	5.90	\$944.00
6/5/2019	MM	review correspondence from court re: motion briefing schedule	0.10	\$16.00
6/7/2019	MM	telephone conference with court reporter re: caption	0.20	\$32.00
6/10/2019	MM	review correspondence from codefendant re: subpoenaed dep of Borough Attorney	0.10	\$16.00
6/11/2019	MM	telephone conference with John Markel re: mediation	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

7/1/2019
Page: 2

6/12/2019	MM	review correspondence from plaintiff re: motion to compel	0.10	\$16.00
6/12/2019	MM	draft correspondence to plaintiff re: motion to compel	0.20	\$32.00
6/12/2019	MM	review and analyze deposition testimony of Dorothy Siek	0.40	\$64.00
6/13/2019	EC	Page line summary of Dorothy Siek pages 1-60	1.00	\$75.00
6/13/2019	MM	Prepare deposition summary ltr to the company re: Dorothy Siek	0.60	\$96.00
6/13/2019	MM	preparation for status conference with Court	0.50	\$80.00
6/14/2019	MM	telephone conference with codefendant re: defense strategy on conference call	0.20	\$32.00
6/14/2019	MM	telephone conference with Judge Waldor re: status conference	0.40	\$64.00
6/14/2019	MM	draft email to all parties re: call in information	0.10	\$16.00
6/14/2019	MM	second telephone conference with codefendant re: future handling	0.10	\$16.00
6/14/2019	MM	telephone conference with proposed mediator re: mediation	0.30	\$48.00
6/14/2019	MM	draft email to all parties re: mediation	0.20	\$32.00
6/17/2019	MM	review text order from Court re: discovery extension	0.10	\$16.00
6/17/2019	EC	Continue page line summary of Shawn Kudlacik pages 112-129	0.30	\$22.50
6/17/2019	DP	Receipt and review e-mail from Court re: minute entry/conference	0.10	\$16.00
6/17/2019	DP	Receipt and review e-mail from Court re: Text Order	0.10	\$16.00
6/17/2019	DP	Correspondence to company re: status/Court order	0.20	\$32.00
6/17/2019	MM	telephone conference with codefendant re: motion	0.20	\$32.00
6/17/2019	MM	draft email to plaintiff re: discovery	0.20	\$32.00
6/17/2019	MM	revise and analyze plaintiff's brief in support of motion to compel in preparation for drafting opposition	0.30	\$48.00
6/17/2019	MM	legal research production of IA files and personnel records	1.30	\$208.00
6/17/2019	MM	draft outline opposition to motion to compel	0.80	\$128.00
6/18/2019	MM	review correspondence from plaintiff re: motion to compel	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

7/1/2019
Page: 3

6/18/2019	MM	review second correspondence from plaintiff re: motion to compel	0.10	\$16.00
6/18/2019	MM	review correspondence from Court re: Order of dismissal BCPO	0.10	\$16.00
6/19/2019	MM	review and analyze deposition transcript of plaintiff Fehl	0.60	\$96.00
6/20/2019	DP	Receipt and review Court notice re: motion schedule	0.10	\$16.00
6/20/2019	EC	Page line summary of Joseph Fehl pages 1-51	0.90	\$67.50
6/21/2019	MM	continue drafting brief in opposition to Motion to Compel	1.80	\$288.00
6/22/2019	DP	Receipt and review submission from plaintiff to Court re: leave to file motion	0.10	\$16.00
6/24/2019	EC	Continue page line summary of Joseph Fehl pages 52-156	1.70	\$127.50
6/24/2019	MM	telephone conference with codefendant re: motion to compel	0.20	\$32.00
6/24/2019	MM	legal research IA files	0.80	\$128.00
6/24/2019	MM	draft/revise brief in opposition to Motion to Compel	1.70	\$272.00
6/26/2019	MM	review correspondence from court reporter re: exhibits marked at plaintiff's deposition	0.10	\$16.00
6/27/2019	MM	draft correspondence to the company re: Plaintiff's deposition summary	0.90	\$144.00
6/27/2019	EC	Update and revise our deposition transcripts binders and index	0.30	\$22.50
6/27/2019	MM	review correspondence from codefendant re: discovery	0.10	\$16.00
6/28/2019	MM	draft email to all counsel re: deposition of Baginski	0.20	\$32.00

Billable Hours / Fees: 31.70 \$4,520.00

Timekeeper Summary

Timekeeper MM worked 24.30 hours at \$160.00 per hour, totaling \$3,888.00.

Timekeeper DP worked 0.60 hours at \$160.00 per hour, totaling \$96.00.

Timekeeper EC worked 6.40 hours at \$75.00 per hour, totaling \$480.00.

Timekeeper JB worked 0.40 hours at \$140.00 per hour, totaling \$56.00.

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

7/1/2019
Page: 4

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
6/12/2019	Check Number - 58834 against Inv# 1951	(\$3,590.63)
Total Payments Received:		(\$3,590.63)

Current Invoice Summary

Prior Balance:	\$4,790.79	
Payments Received:	(\$3,590.63)	Last Payment: 6/12/2019
Unpaid Prior Balance:	\$1,200.16	
Current Fees:	\$4,520.00	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$5,720.16	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

PAY
1,130.00

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

August 01, 2019

Invoice No. 2161

Summit Risk Services
Ryan Thomas

CC: JOHN MARKEL

Split - 75% BR / 25% Summit
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Feh1 v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 7/31/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
7/1/2019	MM	Legal research grand jury privilege	0.80	\$128.00
7/1/2019	MM	legal research internal affairs records	0.90	\$144.00
7/1/2019	MM	draft/revise opposition to motion to compel	2.20	\$352.00
7/15/2019	MM	review correspondence from plaintiff re: Baginski deposition	0.10	\$16.00
7/15/2019	MM	review correspondence from codefendant re: Baginski deposition	0.10	\$16.00
7/15/2019	MM	review second correspondence from plaintiff re: deposition	0.10	\$16.00
7/15/2019	MM	preparation for deposition of codefendant Baginski	1.70	\$272.00
7/16/2019	MM	attendance at deposition of codefendant Baginski	3.10	\$496.00
7/17/2019	DP	Preparation for case conference	0.30	\$48.00
7/17/2019	DP	Participation in case telephone conference before Judge Waldor	0.50	\$80.00
7/17/2019	MM	review correspondence from codefendant re: depositions	0.10	\$16.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

8/1/2019
Page: 2

7/17/2019	MM	draft email to codefendant re: depositions	0.10	\$16.00
7/17/2019	DP	Receipt and review Minute Entry from Court re: conference	0.10	\$16.00
7/17/2019	DP	Receipt and review Text Order from Court re: next conference	0.10	\$16.00
7/22/2019	EC	Review and index docs rec re: Baginski's response to 2nd notice to produce	0.40	\$30.00
7/25/2019	MM	review file in preparation of fifth litigation loss report	0.20	\$32.00
7/25/2019	MM	begin drafting fifth litigation loss report	0.30	\$48.00
7/29/2019	MM	review correspondence from codefendant re: exhibits and transcripts to Baginski deposition	0.10	\$16.00
7/29/2019	MM	review and analyze deposition testimony of codefendant Baginski	0.40	\$64.00

Billable Hours / Fees: 11.60 \$1,822.00

Timekeeper Summary

Timekeeper MM worked 10.20 hours at \$160.00 per hour, totaling \$1,632.00.

Timekeeper DP worked 1.00 hours at \$160.00 per hour, totaling \$160.00.

Timekeeper EC worked 0.40 hours at \$75.00 per hour, totaling \$30.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
7/15/2019	Court Reporting - dep transcript	\$306.39	
	Total Costs	\$306.39	

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
7/10/2019	Check Number 59062 against Inv# 2064	(\$3,390.00)
	Total Payments Received:	(\$3,390.00)

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

8/1/2019
Page: 3

Current Invoice Summary

Prior Balance:	\$5,720.16	
Payments Received:	(\$3,390.00)	Last Payment: 7/10/2019
Unpaid Prior Balance:	<u>\$2,330.16</u>	
Current Fees:	\$1,822.00	
Advanced Costs:	<u>\$306.39</u>	
TOTAL AMOUNT DUE:	<u><u>\$4,458.55</u></u>	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pay
455.50

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

September 05, 2019

Invoice No. 2234

Summit Risk Services
Ryan Thomas
CC: JOHN MARKEL
Split - 75% BR / 25% Summit
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 FehI v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 8/31/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/5/2019	EC	Page line summary of Witold Baginski pages 1-90	1.70	\$127.50
8/5/2019	EC	Continue page line summary of Shawn Kudlacik pages 130-144	0.30	\$22.50
8/20/2019	EC	Page line summary of Shawn Kudlacik pages 145-179	0.50	\$37.50
8/26/2019	YR	telephone confrence with Judge Waldor re: status conference/oral argument/motion to compel	0.10	\$7.50
8/26/2019	YR	draft e-mail to all parties re: oral argument/motion to compel/status conference	0.10	\$7.50
8/26/2019	MM	telephone conference with Chief re: IAs	0.20	\$32.00
8/26/2019	MM	telephone conference with IA Lieutenant re: records	0.20	\$32.00
8/26/2019	MM	review grand jury transcript in preparation for oral argument on motion to compel	0.50	\$80.00
8/26/2019	MM	review dep transcript of Kudlacik re: motion to compel	1.10	\$176.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

9/5/2019
Page: 2

8/26/2019	MM	prepare for oral argument motion to compel/case status conference	1.30	\$208.00
8/27/2019	DP	Receipt and review minute entry from Court re: conference	0.10	\$16.00
8/27/2019	DP	Receipt and review text order from Court re: discovery schedule	0.10	\$16.00
8/27/2019	MM	telephone conference with client re: IA files	0.30	\$48.00
8/27/2019	MM	attendance at oral argument before Judge Waldor re: Plaintiff's motion to compel	2.80	\$448.00
8/27/2019	MM	review text order from court re: motion	0.10	\$16.00
8/27/2019	MM	review text order from court re: case management	0.10	\$16.00
8/27/2019	MM	second telephone conference with client re: conference	0.20	\$32.00
8/28/2019	MM	telephone conference with client re: motion/future handling	0.30	\$48.00
8/29/2019	DP	Receipt and review e-mail from company re: deposition	0.10	\$16.00

Billable Hours / Fees: 10.10 \$1,386.50

Timekeeper Summary

Timekeeper MM worked 7.10 hours at \$160.00 per hour, totaling \$1,136.00.

Timekeeper EC worked 2.50 hours at \$75.00 per hour, totaling \$187.50.

Timekeeper DP worked 0.30 hours at \$160.00 per hour, totaling \$48.00.

Timekeeper YR worked 0.20 hours at \$75.00 per hour, totaling \$15.00.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
8/15/2019	Check Number - 59302 against Inv# 2161	(\$1,289.91)
8/15/2019	Check Number - 59302 against Inv# 2161	(\$306.39)
Total Payments Received:		(\$1,596.30)

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

9/5/2019
Page: 3

Current Invoice Summary

Prior Balance:	\$4,458.55	
Payments Received:	(\$1,596.30)	Last Payment: 8/15/2019
Unpaid Prior Balance:	<u>\$2,862.25</u>	
Current Fees:	\$1,386.50	
Advanced Costs:	<u>\$0.00</u>	
TOTAL AMOUNT DUE:	<u><u>\$4,248.75</u></u>	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pay
346.63

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

June 03, 2019

Invoice No. 1951

Summit Risk Services
Ryan Thomas
CC: JOHN MARKEL
Split - 75% BR / 25% Summit
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4788 Fehl v. Borough of Wallington, et al.

Claim Number: QM-1030

File Number: 024-4788

Summit Risk sharing cost (25%) with SBJIF (75%)
For Services Rendered Through 5/31/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/1/2019	MM	telephone conference with client re: location of former employee noticed for deposition	0.20	\$32.00
5/2/2019	MM	review correspondence from codefendant BCPO re: stipulation of dismissal	0.10	\$16.00
5/2/2019	MM	review correspondence from Borough Administrator re: last known address for Dorothy Siek	0.10	\$16.00
5/2/2019	MM	draft correspondence to BA re: reason for Siek's separation from Borough	0.10	\$16.00
5/2/2019	MM	review correspondence from client re: retirement of Siek	0.10	\$16.00
5/2/2019	MM	draft letter to Dorothy Siek re: deposition availability	0.20	\$32.00
5/2/2019	MM	telephone conference with Dorothy Siek	0.10	\$16.00
5/2/2019	MM	draft/revise 90 day report in final form	0.30	\$48.00
5/6/2019	YR	telephone conference with co-defendant re: depositions	0.10	\$7.50

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

6/3/2019
Page: 2

5/6/2019	MM	review correspondence from plaintiff re: discovery	0.10	\$16.00
5/6/2019	MM	draft email to all counsel re: deposition of Dorothy Siek	0.20	\$32.00
5/6/2019	MM	draft second email to all counsel re: deposition of Dorothy Siek	0.10	\$16.00
5/6/2019	MM	telephone conference with Dorothy Siek re: deposition	0.30	\$48.00
5/6/2019	MM	draft email to all counsel re: Dorothy Siek deposition	0.20	\$32.00
5/6/2019	MM	review additional email from plaintiff re: discovery	0.10	\$16.00
5/8/2019	EC	Index Borough of Wallington's document production Bates 1-388	1.60	\$120.00
5/8/2019	EC	Page line Baginsky's document production Bates 1-372	2.00	\$150.00
5/8/2019	DB	telephone conference with all parties re: depositions	0.20	\$15.00
5/8/2019	DB	telephone conference with Captain Kudlacik re: deposition	0.10	\$7.50
5/8/2019	DP	telephone conference with co-defendant Bergen County Prosecutor's Office re: stipulation of dismissal	0.20	\$32.00
5/8/2019	MM	review email from plaintiff re: Kudlachik deposition	0.10	\$16.00
5/8/2019	MM	review deposition notice of Dorothy Siek	0.10	\$16.00
5/8/2019	MM	draft email to plaintiff re: depositions	0.10	\$16.00
5/8/2019	MM	telephone conference with codefendant BCPO re: stip of dismissal	0.10	\$16.00
5/8/2019	MM	preparation for deposition of client Kudlacik+	1.50	\$240.00
5/9/2019	EC	Index Baginsky's document production Bates 373-688	1.40	\$105.00
5/9/2019	JB	Legal research re: 1983/common law malicious prosecution case law.	0.60	\$84.00
5/9/2019	JB	Legal research re: qualified immunity for malicious prosecution.	0.60	\$84.00
5/9/2019	JB	Prepare memo/analysis to file re: malicious prosecution/qualified immunity.	0.50	\$70.00
5/9/2019	MM	meeting with Captain Kudlacik in preparation for deposition	1.00	\$160.00
5/9/2019	MM	attendance at deposition of deposition of client Captain Kudlacik	6.30	\$1,008.00

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Client Number: 20972024
Matter Number: 4788

6/3/2019
Page: 3

5/9/2019	EC	Index Baginski's document production Bates 689-1136	1.80	\$135.00
5/10/2019	MM	review and analyze all documents marked as exhibits at Kudlacik deposition in preparation for drafting sj outline	0.70	\$112.00
5/13/2019	JB	Begin legal research re: third circuit case law (USC 1983 claims) by Judge presiding over this matter.	0.50	\$70.00
5/13/2019	MM	telephone conference with client re: deposition and future handling	0.40	\$64.00
5/14/2019	MM	review documents marked as exhibits re: future handling additional discovery	0.60	\$96.00
5/14/2019	MM	draft email to plaintiff re: deposition	0.20	\$32.00
5/14/2019	MM	review correspondence from plaintiff re: depositions	0.10	\$16.00
5/14/2019	MM	draft correspondence to plaintiff re: depositions	0.10	\$16.00
5/15/2019	MM	review correspondence from codefendant re: depositions	0.10	\$16.00
5/16/2019	EC	Update index and binder of exhibits marked at depositions	0.70	\$52.50
5/16/2019	MM	review correspondence from plaintiff re: depositions	0.10	\$16.00
5/16/2019	MM	draft deposition notice to plaintiff	0.20	\$32.00
5/16/2019	MM	review correspondence from plaintiff re: subpoenas	0.10	\$16.00
5/16/2019	MM	review subpoena for Corrigan Law firm	0.10	\$16.00
5/16/2019	MM	review subpoena for law offices of Robert Tandy	0.10	\$16.00
5/17/2019	DP	Receipt and review e-mail from plaintiff re: subpoenas	0.10	\$16.00
5/20/2019	JB	Continue legal research re: third circuit case law (USC 1983 claims) by Judge presiding over this matter.	1.00	\$140.00
5/20/2019	JB	Prepare analysis/memo of law re: third circuit case law (USC 1983 claims) by Judge presiding over this matter.	0.70	\$98.00
5/21/2019	JB	Legal research re: third circuit case law (municipal liability) by Judge presiding over this matter.	0.50	\$70.00
5/21/2019	JB	Prepare analysis/memo of law re: third circuit case law (municipal liability) by Judge presiding over this matter.	0.40	\$56.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

6/3/2019
Page: 4

5/23/2019	MM	review supplemental document production by plaintiff	0.40	\$64.00
5/23/2019	JB	Revise/update index of Plaintiff's document production.	0.20	\$28.00
5/23/2019	JB	Revise/update memo re: chronology of events.	0.10	\$14.00
5/24/2019	MM	review correspondence from plaintiff re: discovery	0.10	\$16.00
5/24/2019	MM	draft correspondence to all counsel re:discovery	0.10	\$16.00
5/24/2019	MM	telephone conference with witness re: deposition	0.10	\$16.00
5/27/2019	MM	review correspondence from plaintiff re: joint discovery dispute letter	0.10	\$16.00
5/28/2019	JB	Review email from Plaintiff re: deposition/discovery.	0.10	\$14.00
5/28/2019	MM	preparation for deposition of Borough employee Dorothy Siek	1.10	\$176.00
5/28/2019	MM	attendance at meeting with client re: deposition	0.50	\$80.00
5/28/2019	MM	attendance at deposition of Borough employee Dorothy Siek	2.80	\$448.00
5/28/2019	MM	telephone conference with company re: stip of dismissal as to AG's office	0.10	\$16.00
5/28/2019	MM	draft email to company re: stip of dismissal as to AG's office	0.10	\$16.00
5/29/2019	MM	draft correspondence to DAG re: stipulation of dismissal	0.20	\$32.00
5/29/2019	MM	telephone conference with company re: stip and mediation	0.20	\$32.00
5/30/2019	EC	Revise deposition exhibits index and binder	0.50	\$37.50
5/30/2019	EC	Page line summary of Shawn Kudlacik pages 1-30	0.50	\$37.50
5/30/2019	MM	draft email to plaintiff re: mediation	0.20	\$32.00
5/31/2019	MM	draft deposition summary of Dorothy Siek	0.60	\$96.00
5/31/2019	MM	draft email to plaintiff re: mediation	0.10	\$16.00

Billable Hours / Fees: 35.30 \$4,787.50

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

6/3/2019
Page: 5

Timekeeper Summary

Timekeeper JB worked 5.20 hours at \$140.00 per hour, totaling \$728.00.
Timekeeper MM worked 20.90 hours at \$160.00 per hour, totaling \$3,344.00.
Timekeeper EC worked 8.50 hours at \$75.00 per hour, totaling \$637.50.
Timekeeper DP worked 0.30 hours at \$160.00 per hour, totaling \$48.00.
Timekeeper YR worked 0.10 hours at \$75.00 per hour, totaling \$7.50.
Timekeeper DB worked 0.30 hours at \$75.00 per hour, totaling \$22.50.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/1/2019	Check Number 58522 against Inv# 1727	(\$1,687.23)
5/9/2019	Check Number - 6537 against Inv# 1806	(\$383.12)
5/9/2019	Check Number - 6537 against Inv# 1887	(\$179.29)
5/9/2019	Check Number - 6537 against Inv# 1887	(\$328.70)
5/9/2019	Check Number - 6537 against Inv# 1887	(\$7.33)
5/9/2019	Check Number - 6537 against Inv# 1887	(\$47.10)
5/15/2019	Check Number - 58635 against Inv# 1887	(\$3,369.54)
Total Payments Received:		(\$6,002.31)

Current Invoice Summary

Prior Balance:	\$6,005.60	
Payments Received:	(\$6,002.31)	Last Payment: 5/15/2019
Unpaid Prior Balance:	\$3.29	
Current Fees:	\$4,787.50	
Advanced Costs:	\$0.00	
TOTAL AMOUNT DUE:	\$4,790.79	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pay
1,197.63

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041

10/1/2019
Invoice No. ~~2338~~

2353

Fehl v. Borough of Wallington, et al.
Ryan Thomas CC: JOHN MARKEL
Summit Risk Services
Split - 75% BR / 25% Summit
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
Matter Number: 4788 Fehl v. Borough of Wallington, et al.
Summit 25%; SBJIF 75%; QM-1030; 024-4788
For Services Rendered from 1/1/2019 Through 9/30/2019.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
L160 9/26/2019	Settlement/Non-Binding ADR 02	Review / Analyze email from company re: defense strategy	0.10	\$16.00
Settlement/Non-Binding ADR			0.10	\$16.00
L310 9/27/2019	Written Discovery 02	Review email from plaintiff re: subpoena on attorney	0.10	\$16.00
Written Discovery			0.10	\$16.00
L350 9/6/2019	Discovery Motions 02	draft email to company re: motion/case management	0.20	\$32.00
Discovery Motions			0.20	\$32.00
Grand Total:			0.40	\$64.00
Billable Hours / Fees:			0.40	\$64.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4788

10/1/2019
Page: 2

Timekeeper Summary

Timekeeper 02 worked 0.40 hours at \$160.00 per hour, totaling \$64.00.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/11/2019	Check Number - 59528 against Inv# 2234	(\$1,039.88)
Total Payments Received:		(\$1,039.88)

Current Invoice Summary

Prior Balance:	\$4,248.75	Last Payment: 9/11/2019
Payments Received:	(\$1,039.88)	
Unpaid Prior Balance:	\$3,208.87	
Current Fees:	\$64.00	
TOTAL AMOUNT DUE:	\$3,272.87	

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Attn: Mr. Michael Halbherr

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

Page: 1
November 05, 2019
Client No.: 3478-054

**FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter**

Fees

			Hours
10/01/2019	CCB	Receipt and analysis of correspondence and plaintiff's expert report; prepare memo to file, re: outline of expert report	1.00
10/02/2019	CCB	Prepare deficiency letter to plaintiff's counsel, re: expert report; research re: background and previous publications from plaintiff's expert	1.00
10/03/2019	CCB	Receipt and analysis of memo from counsel, re: updated C.V. for expert	0.20
10/04/2019	CCB	Research / fact check for updated C.V. of expert	0.80
10/07/2019	CCB	Receipt and analysis of plaintiff's settlement demand; memo from co-defendants' counsel; memo to file	0.50
10/23/2019	CCB	Receipt and analysis of Court notice re: Status Conference	0.20
10/24/2019	DLM	Receipt and analysis of eCourt notification scheduling conference	

Re: Wallington adv. Fehl
 Summit Claim # QM-1030
 Bergen Risk Claim # 2018130230
 Tax Id. # 26-2748605

		Hours	
	call with Judge Waldor on January 28th; update calendar	0.30	
	CCB Telephone conference call with Judge Waldor and adversary; review Judge Waldor's Order, re: discovery and Pre-Trial Order; memo to file	1.30	
10/30/2019	CCB Receipt and analysis of discovery letter from co-defendants' counsel	0.20	
10/31/2019	CCB Receipt and analysis of letter from plaintiff's counsel, re: tax returns	0.20	
	TOTAL CURRENT FEES	5.70	886.50

<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Senior Partner	5.40	\$160.00	\$864.00
Paralegal	0.30	75.00	22.50

TOTAL CURRENT WORK	886.50
PREVIOUS BALANCE	\$1,788.31

Payments

10/11/2019	BRM's Fee Payment Received - Thank You	-48.00
	TOTAL STATEMENT	<u>\$2,626.81</u>

Aged Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
886.50	16.00	260.25	560.75	903.31	0.00

Pay
 221.62-

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Attn: Mr. Michael Halbherr

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

Page: 1
October 03, 2019
Client No.: 3478-054

**FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter**

Fees

			Hours	
09/30/2019	CCB	Receipt and analysis of memo from plaintiff's counsel to Mr. Tandy re: Subpeona; memo to file	0.40	
		TOTAL CURRENT FEES	0.40	64.00
	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
	Senior Partner	0.40	\$160.00	\$64.00
	TOTAL CURRENT WORK			64.00
	PREVIOUS BALANCE			\$2,505.06

Payments

09/12/2019	BRM's Fee Payment Received - Thank You	-764.75
09/12/2019	BRM's Expense Payment Received - Thank You	-16.00
	TOTAL PAYMENTS	-780.75

Summit Risk Services

Page: 2
October 03, 2019
Client No.: 3478-054

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

TOTAL STATEMENT

\$1,788.31

Aged Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
324.25	560.75	0.00	903.31	0.00	0.00

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Page: 1
September 04, 2019
Client No.: 3478-054

Attn: Mr. Michael Halbherr

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter

Fees

			Hours	
08/07/2019	DLM	Outline, organize, and prepare memo to file re. summary and analysis of plaintiff's deposition testimony.	3.00	
	CCB	Analysis of memo re: deposition of plaintiff	0.30	
08/26/2019	CCB	Receipt and analysis of memo from counsel re: Motion Hearing	0.20	
	CCB	Prepare for and outline oral argument for Motion before Judge Waldor	1.00	
08/27/2019	CCB	Attendance at Court before Judge Waldor (US District Court, Newark) for oral argument of Motion to Compel Discovery	3.50	
		TOTAL CURRENT FEES	8.00	1,025.00

<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Senior Partner	5.00	\$160.00	\$800.00
Paralegal	3.00	75.00	225.00

Summit Risk Services

Page: 2
September 04, 2019
Client No.: 3478-054

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

Expenses

08/27/2019	Courthouse Parking (Newark)	16.00
	Delivery Service Charges	16.00
	TOTAL EXPENSES	16.00
	TOTAL CURRENT WORK	1,041.00
	PREVIOUS BALANCE	\$3,146.26

Payments

08/15/2019	BRM's Expense Payment Received - Thank You	-412.45
08/15/2019	BRM's Fee Payment Received - Thank You	-1,269.75
	TOTAL PAYMENTS	-1,682.20
	TOTAL STATEMENT	<u>\$2,505.06</u>

Aged Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
1,601.75	0.00	903.31	0.00	0.00	0.00

Pay
260.25

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Attn: Mr. Michael Halbherr

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

Page: 1
August 05, 2019
Client No.: 3478-054

**FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter**

Fees

		Hours
07/01/2019	CCB Telephone conference with plaintiff's counsel, re: deposition	0.20
	CCB Receipt and analysis of co-defendants' Opposition to Motion to Compel; memo to file	0.50
07/02/2019	CCB Receipt and analysis of proposed Order	0.20
07/03/2019	DLM Receipt / review emails between all parties re: deposition of Vic Baginski; calendar dep date of July 16th	0.30
07/09/2019	CCB Attention to status of discovery motions; memo to counsel re: discovery compliance	0.50
	CCB Prepare memo to Mr. Tandy, Esq., re: deposition preparation of Baginski; review response	0.30
07/11/2019	CCB Prepare memo to counsel, re: deposition	0.20

Summit Risk Services

Page: 2
 August 05, 2019
 Client No.: 3478-054

Re: Wallington adv. Fehl
 Summit Claim # QM-1030
 Bergen Risk Claim # 2018130230
 Tax Id. # 26-2748605

			Hours	
07/15/2019	CCB	Receipt and analysis of memo from plaintiff's counsel; telephone conference with plaintiff's counsel, re: deposition	0.40	
	CCB	Office conference re: preparation for deposition with defendant, Vic Baginski	2.30	
07/16/2019	CCB	Prepare for and defend deposition of Vic Baginski	5.00	
07/17/2019	CCB	Memo to Ms. McDonnell, Esq., re: deposition	0.20	
	CCB	Prepare for and attend telephone status conference with Judge Waldor; memo to file	1.00	
07/28/2019	CCB	Receipt and analysis of deposition transcript of Vic Baginski	0.50	
		TOTAL CURRENT FEES	11.60	1,830.50
	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
	Senior Partner	11.30	\$160.00	\$1,808.00
	Paralegal	0.30	75.00	22.50

Expenses

07/25/2019	Deposition transcript of Vic Baginski (Hudson Court Reporting - Invoice # 29165)	412.45
	Delivery Service Charges	412.45
	TOTAL EXPENSES	412.45
	TOTAL CURRENT WORK	2,242.95
	PREVIOUS BALANCE	\$3,814.20

Payments

07/01/2019	SUMMIT's Expense Credit	-15.70
07/01/2019	SUMMIT's Fee Credit	-34.54
07/10/2019	BRM's Fee Payment Received - Thank You	-2,860.65
	TOTAL PAYMENTS	-2,910.89

Pay
 560.75

Summit Risk Services

Page: 3
August 05, 2019
Client No.: 3478-054

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

TOTAL STATEMENT

\$3,146.26

Aged Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
2,242.95	903.31	0.00	0.00	0.00	0.00

BOTTA ANGELI, LLC
Counsellors At Law
50 South Franklin Turnpike
Ramsey, New Jersey 07446
(201) 818-6400

Summit Risk Services
120 Gibraltar Road
Suite 210
Horsham, PA 19044

Page: 1
July 01, 2019
Client No.: 3478-054

Attn: Mr. Michael Halbherr

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

FOR PROFESSIONAL SERVICES RENDERED
in connection with the above captioned matter

Fees

		Hours
06/03/2019	CCB Receipt and analysis of letter and Court Order, re: discovery	0.30
06/04/2019	CCB Prepare for deposition of plaintiff, outline timeline and analysis of video statements and trial testimony	2.30
	CCB Attendance at deposition of plaintiff, Joseph Fehl, at plaintiff's counsel's office	6.00
06/10/2019	CCB Receipt and analysis of labor attorney's response to Subpeona; prepare memo to counsel	0.50
06/11/2019	CCB Telephone conference with Mr. Markel	0.20
06/13/2019	CCB Receipt and analysis of memo from counsel	0.20
06/14/2019	CCB Receipt and analysis of plaintiff's Motion to Compel Discovery; notes to file	0.60

Re: Wallington adv. Fehl
 Summit Claim # QM-1030
 Bergen Risk Claim # 2018130230
 Tax Id. # 26-2748605

		Hours
	CCB Prepare for and attend status conference call with Judge Waldor; notes to file, re: Judge Waldor's determination and scheduling	2.00
	CCB Receipt and analysis of memo from counsel re: proposed Mediation	0.20
06/17/2019	DLM Calendar deadline dates from Judge Waldor's June 17th text Order	0.30
	CCB Receipt and analysis of filed Stipulation of Dismissal as to County	0.20
	CCB Receipt and analysis of Order compelling deposition of Baginski; notes to file	0.40
	CCB Telephone conference with Ms. McDonnell, Esq., re: status and proposed Mediation	0.20
	CCB Receipt and analysis of correspondence re: EPL policy	0.20
06/18/2019	CCB Prepare letter to Baginski's personal counsel, re: Order to Compel Deposition	0.50
	CCB Receipt and analysis of Order from Judge Hayden re: County defendants	0.20
06/20/2019	CCB Receipt and analysis of Judge Waldor's Order, re: discovery schedule	0.20
06/21/2019	CCB Receipt and analysis of memo from Borough Labor Counsel; memo to file	0.40
06/24/2019	CCB Telephone conference with Ms. McDonnell, Esq., re: motion status	0.20
06/25/2019	CCB Prepare memo to Baginski's personal counsel, re: deposition dates	0.20
	CCB Prepare responses to Second Notice to Produce to Baginski; analysis of documents; review litigation documents from his personal suit against Borough for privilege; telephone conference with Mr. Olmo; telephone conference with Mr. Corrigan, Esq.	3.40
06/27/2019	CCB Continued preparation of responses to Second Notice to Produce to Baginski; prepare memo to Labor Counsel and Borough	

Summit Risk Services

Page: 3
July 01, 2019
Client No.: 3478-054

Re: Wallington adv. Fehl
Summit Claim # QM-1030
Bergen Risk Claim # 2018130230
Tax Id. # 26-2748605

	Hours	
Administrator; analysis of disciplinary documents from Labor Counsel for privilege issues	2.50	
CCB Receipt and analysis of correspondence from Baginski counsel, re: available dates for deposition; prepare memo to all counsel, re: Baginski deposition; review, revise and finalize responses to Second Notice to Produce to Baginski	2.70	
TOTAL CURRENT FEES	23.90	3,798.50

Title	Hours	Rate	Total
Senior Partner	23.60	\$160.00	\$3,776.00
Paralegal	0.30	75.00	22.50

Expenses

06/28/2019	Postage	15.70
	Postage	15.70
	TOTAL EXPENSES	15.70
	TOTAL CURRENT WORK	3,814.20
	PREVIOUS BALANCE	\$3,019.45

Payments

06/11/2019	SUMMIT's Expense Credit - Thank You	-1.95
06/11/2019	SUMMIT's Fee Credit - Thank You	-752.92
06/20/2019	BRM's Fee Payment Received - Thank You	-2,264.58
	TOTAL PAYMENTS	-3,019.45
	TOTAL STATEMENT	<u>\$3,814.20</u>

Pay 903.31

GLENN MILLER ASSOCIATES LLC

315 West 14th St., Ship Bottom, NJ 08008 · 609-457-1997

www.glennmillerassociates.com

glennmillerassociates@gmail.com

INVOICE # 2019-015

Page 1

BILL TO:

Pfund McDonnell, PC
Ms. Mary McDonnell, Esq.
139 Prospect Street
Ridgewood, NJ 07450

PROJECT: FEHL VS. BOROUGH OF
WALLINGTON, ET AL

QUANTITY	DESCRIPTION	RATE	AMOUNT
	Note: The inventory of materials examined in this case and referenced throughout this invoice is detailed in the list of "materials reviewed" on pages 3 and 4 of the report I submitted in this matter.		
10/2/19	Initial review of materials (1 hour)	No Charge	N/A
10/8/19	Review of WPD reports, expert report, civil complaint (2 hours)	\$125	\$250.00
10/9/19	Review of Kudlacik interrogatory, misc. documents (1 hour)	\$125	\$125.00
10/11/19	Review of trial testimony, McCaffrey, Baginski, Seik depositions (7 hours)	\$125	\$875.00
10/15/19	Review Fehl deposition, re-review expert report (5 hours)	\$125	\$625.00
10/16/19	Complete additional document request; commence report (4 hours)	\$125	\$500.00
10/18/19	Write report (5 hours)	\$125	\$625.00
10/19/19	Write report (5 hours)	\$125	\$625.00
10/21/19	Write report (4 hours)	\$125	\$500.00
		PAGE 1-subtotal	\$4,125

Thank you for your business. Please make checks payable to Glenn Miller Associates LLC TOTAL: \$6,250.00

GLENN MILLER ASSOCIATES LLC

315 West 14th St., Ship Bottom, NJ 08008 · 609-457-1997

www.glennmillerassociates.com

glennmillerassociates@gmail.com

INVOICE # 2019-015

Page 2

BILL TO:

Pfund McDonnell, PC
Ms. Mary McDonnell, Esq.
139 Prospect Street
Ridgewood, NJ 07450

PROJECT: FEHL VS. BOROUGH OF
WALLINGTON, ET AL

QUANTITY	DESCRIPTION	RATE	AMOUNT
11/11/19	Review additional materials sent, continue report (7 hours)	\$125.00	\$875.00
11/12/19	Continue report (4 hours)	\$125.00	\$500.00
11/18/19	Complete report and submit draft to client (3 hours)	\$125.00	\$375.00
12/2/19	Final report review and submission to client (3 hours)	\$125.00	\$375.00
		PAGE 1-subtotal	\$4,125.00
		PAGE 2-subtotal	\$2,125.00

Thank you for your business. Please make checks payable to Glenn Miller Associates LLC **TOTAL: \$6,250.00**

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4676

Client: QBE TPAS (Non - GB/York/Sedgwick)
Client Invoice ID: 4676
Matter Name: FehI v. Borough of Wallington, et al.
Date of Loss: 11/09/2017
Claim Number(s): QM-1030
Insured Name(s): Borough of Wallington, n/a
Claim Professional: Matthew Yost
Claim Office: Summit
Product Line:
Firm Tax ID (FEIN): 273179634
Firm Name: Pfund McDonnell, P.C.
Firm Address: 139 Prospect Street Second Floor, Ridgewood, NJ 07450

Firm Phone: 201-857-5040
Firm Fax: 201-857-5041
Firm File Number: 024-4788
Firm Invoice Number: 2533
Firm Invoice Date: 01/06/2020
Invoice Activity Period: 10/01/2019 to 12/19/2019
Total Fees: 3,674.00
Total Expenses: 0.00
Total Hours Billed: 23.50
Comments for firm:
Receipt Date: 01/06/2020
Release Date: 01/09/2020 10:34 AM

Timekeeper Summary

Timekeeper	Rate	Hours	Amount
04 (Pfund, David)	160.00	0.90	144.00
02 (McDonnell, Mary)	160.00	19.60	3,136.00
07 (Curtis, Elizabeth)	75.00	0.30	22.50
05 (Bauer, Dianna)	75.00	0.10	7.50
06 (Keane, Joseph)	140.00	2.60	364.00

Bill Analysis Summary

	Billed	Deductions	Credits	Overrides	Shared Amount	Tax Amount	To Pay
Fees	3,674.00	214.30	0.00	0.00	864.93	0.00	864.93
Expenses	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Totals	3,674.00	214.30	0.00	0.00	864.93	0.00	864.93

* The Shared Amount reflects a rate of 25% for fees and 25% for expenses.

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4676

Bill Analysis Details

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
1	10/01/2019	L344	02	review and analyze police practice expert report served by plaintiff	0.30	160.0000	48.00	Fee	U
2	10/01/2019	L344	02	review correspondence from plaintiff re: expert report	0.10	160.0000	16.00	Fee	U
3	10/02/2019	L344	02	Review / Analyze plaintiff's police practice expert report	0.90	160.0000	144.00	Fee	U
4	10/02/2019	L344	02	review multiple emails from expert confirming receipt of discovery materials	0.30	160.0000	48.00	Fee	U
5	10/02/2019	L424	02	Review / Analyze file materials regarding documents for police practices expert	1.20	160.0000	192.00	Fee	U
6	10/02/2019	L423	02	correspondence to police practice expert re: documents to review	0.40	160.0000	64.00	Fee	U
7	10/02/2019	L343	02	Draft / revise email to expert Glen Milller re: documents/police reports	0.10	160.0000	16.00	Fee	U
8	10/02/2019	L348	02	Communicate (other external) with police practices expert re: expert report	0.20	160.0000	32.00	Fee	U
9	10/02/2019	L343	02	email to codefendant re: expert	0.10	160.0000	16.00	Fee	U
10	10/02/2019	L344	02	file re: scheduling order and future handling	0.30	160.0000	48.00	Fee	U
11	10/02/2019	L164	02	email from codefendant to plaintiff re: CV for expert	0.10	160.0000	16.00	Fee	U
12	10/02/2019	L348	02	Communicate (other external) with BCPO re: investigation	0.20	160.0000	32.00	Fee	U
13	10/02/2019	L163	02	Draft / revise email to company re: approval for expert report/sj motion	0.20	160.0000	32.00	Fee	U
14	10/02/2019	L163	02	Draft / revise email to plaintiff re: settlement demand	0.10	160.0000	16.00	Fee	U
15	10/03/2019	L344	02	Review / Analyze email from police practice expert re: retainer, cv and rate schedule	0.10	160.0000	16.00	Fee	U
16	10/03/2019	L344	02	Review / Analyze police practice expert retainer, cv and rate schedule	0.20	160.0000	32.00	Fee	U
17	10/03/2019	L343	02	draft email to company re: police practice expert retainer, cv and rate schedule	0.10	160.0000	16.00	Fee	U
18	10/03/2019	L304	02	email from plaintiff re: expert CV	0.10	160.0000	16.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4676

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
19	10/03/2019	L344	04	Review / Analyze plaintiff's liability expert report	0.30	160.0000	48.00	Fee	U
20	10/03/2019	L343	02	correspondence to company re: retainer/CV/fee schedule	0.20	160.0000	32.00	Fee	U
21	10/03/2019	L344	02	Review / Analyze email from expert re: retainer/CV/fee schedule	0.10	160.0000	16.00	Fee	U
22	10/04/2019	L344	02	Review / Analyze email from expert re: additional documents	0.10	160.0000	16.00	Fee	U
23	10/04/2019	L343	02	Draft / revise email to expert re: additional information	0.10	160.0000	16.00	Fee	U
24	10/04/2019	L343	02	Draft / revise email to expert re: additional information	0.10	160.0000	16.00	Fee	U
Deduction: Duplicate Entries Fees					-0.10	0.0000	-16.00		
Line item previously billed									
25	10/07/2019	L124	02	file in preparation for re: settlement demand/case evaluation	0.40	160.0000	64.00	Fee	U
26	10/07/2019	L163	02	review email from plaintiff re: settlement demand	0.10	160.0000	16.00	Fee	U
27	10/07/2019	L163	02	Draft / revise correspondence to codefendant re: settlement demand/future handling	0.20	160.0000	32.00	Fee	U
28	10/07/2019	L193	02	email re: case evaluation	0.30	160.0000	48.00	Fee	U
29	10/07/2019	L194	02	Review / Analyze file in preparation for responding to evaluation requests	0.40	160.0000	64.00	Fee	U
30	10/07/2019	L194	02	Review / Analyze email from company re: evaluation	0.10	160.0000	16.00	Fee	U
31	10/16/2019	L344	02	review correspondence from police practices expert re: request for additional documents	0.10	160.0000	16.00	Fee	U
32	10/16/2019	L343	02	draft correspondence to police practices expert re: request for additional documents	0.20	160.0000	32.00	Fee	U
33	10/23/2019	L237	05	Communicate with plaintiff's counsel re: telephone conference	0.10	75.0000	7.50	Fee	U
34	10/23/2019	L234	04	Review / Analyze text order from court re: conference	0.10	160.0000	16.00	Fee	U
Deduction: Communications \ Reasonableness of Time					0.00		-15.95		
This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.									
35	10/23/2019	L344	02	review email from expert re: report/supplemental documents	0.10	160.0000	16.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4676

#	Date	Task	PK	Narrative	Units	Rate	Amount	Type	Charge Type
36	10/23/2019	L343	02	review email to expert re: report/supplemental documents	0.20	160.0000	32.00	Fee	U
37	10/23/2019	L343	02	draft email to expert re: report/supplemental documents	0.20	160.0000	32.00	Fee	U
38	10/23/2019	L104	02	review correspondence from plaintiff re: conference call with Court	0.10	160.0000	16.00	Fee	U
39	10/24/2019	L251	02	Conference with Judge Waldor	0.70	160.0000	112.00	Fee	U
40	10/24/2019	L199	02	Conference with Judge Waldor status of discovery/future handling	0.50	160.0000	80.00	Fee	U
41	10/24/2019	L234	04	Review / Analyze text order from Court re: conference	0.10	160.0000	16.00	Fee	U
Deduction: Communications \ Reasonableness of Time					0.00		-15.95		
This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.									
42	10/24/2019	L104	02	review correspondence from court re: text order/conference	0.10	160.0000	16.00	Fee	U
Deduction: Communications \ Reasonableness of Time					0.00		-15.95		
This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.									
43	10/24/2019	L104	02	review second correspondence from court re: discovery order	0.10	160.0000	16.00	Fee	U
44	10/25/2019	L344	02	review correspondence from expert re: additional documents	0.10	160.0000	16.00	Fee	U
45	10/25/2019	L234	04	Review / Analyze Court notice re: 1/28/20 conference	0.10	160.0000	16.00	Fee	U
Deduction: Communications \ Reasonableness of Time					0.00		-15.95		
This appears to be a brief task or communication. Appeals unaccompanied by relevant communication in question may not be considered.									
46	10/30/2019	L423	02	Draft / revise email to plaintiff re: docs requested by plaintiff	0.20	160.0000	32.00	Fee	U
47	10/30/2019	L344	02	Review / Analyze file in preparation of obtaining documents for expert	1.30	160.0000	208.00	Fee	U
48	10/31/2019	L303	02	email to plaintiff re: Discovery	0.10	160.0000	16.00	Fee	U
49	10/31/2019	L304	02	Review / Analyze email from plaintiff re: Discovery	0.10	160.0000	16.00	Fee	U
50	11/04/2019	L348	02	Communicate (other external) draft email expert re: supplemental materials	0.20	160.0000	32.00	Fee	U
51	11/05/2019	L346	06	Communicate (with client) Wallington chief of police re: Fehl investigation and management structure	0.40	140.0000	56.00	Fee	U
52	11/05/2019	L133	06	review discovery responses to obtain additional information for expert	2.20	140.0000	308.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4676

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
53	11/05/2019	L133	02	compile responsive documents for expert	2.40	160.0000	384.00	Fee	U
54	11/06/2019	L346	02	telephone conference with Captain Kudlacik re: expert report and future handling	0.30	160.0000	48.00	Fee	U
55	11/07/2019	L344	02	review second correspondence from police practice experts re: additional documents	0.10	160.0000	16.00	Fee	U
56	11/07/2019	L143	02	begin drafting sixth litigation loss report	0.40	160.0000	64.00	Fee	U
57	11/07/2019	L344	02	review correspondence from police practice experts re: additional documents	0.10	160.0000	16.00	Fee	U
58	11/07/2019	L144	02	review file in preparation for drafting sixth litigation loss report	0.30	160.0000	48.00	Fee	U
59	11/13/2019	L313	02	memo re: BCPO involvement/prosecution of case	0.40	160.0000	64.00	Fee	U
Deduction: Intra Office Conferences/Communications					-0.40		-64.00		
Charges for preparing or reviewing internal memos and communications are not billable. Appeals unaccompanied by relevant communication in question may not be considered.									
60	11/13/2019	L348	02	draft email to police practice expert re: additional information	0.20	160.0000	32.00	Fee	U
61	11/14/2019	L133	02	correspondence to expert re: report/respondent's request for additional information	0.20	160.0000	32.00	Fee	U
62	11/14/2019	L134	02	Review / Analyze correspondence from expert re: report	0.10	160.0000	16.00	Fee	U
63	11/15/2019	L344	02	draft email to police practice expert re: report	0.10	160.0000	16.00	Fee	U
64	11/15/2019	L344	02	review email from police practice expert re: report	0.10	160.0000	16.00	Fee	U
65	11/18/2019	L123	02	draft/revise litigation report in final form	0.20	160.0000	32.00	Fee	U
66	11/18/2019	L423	02	email to expert re: draft report	0.10	160.0000	16.00	Fee	U
67	11/18/2019	L424	02	draft police practices report	0.80	160.0000	128.00	Fee	U
68	11/18/2019	L424	02	correspondence from expert re: draft report	0.10	160.0000	16.00	Fee	U
69	11/25/2019	L346	02	telephone conference with client re: expert report	0.20	160.0000	32.00	Fee	U
70	11/25/2019	L344	02	review correspondence from expert re: expert report	0.10	160.0000	16.00	Fee	U
71	12/02/2019	L123	04	Draft / revise e-mail to company re: status update; per adjusters M Yost & J Markel	0.10	160.0000	16.00	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4676

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
72	12/02/2019	L124	04	Review / Analyze from company re: status update; per adjusters M Yost & J Markel	0.10	160.0000	16.00	Fee	U
73	12/02/2019	L344	02	draft correspondence to expert re: final report	0.10	160.0000	16.00	Fee	U
74	12/02/2019	L344	02	review correspondence from expert re: final report	0.10	160.0000	16.00	Fee	U
75	12/03/2019	L343	02	draft correspondence to all parties re: amending discovery to include expert report	0.20	160.0000	32.00	Fee	U
76	12/03/2019	L343	02	draft correspondence to all parties re: amending discovery to include expert report	0.20	160.0000	32.00	Fee	U
Deduction: Duplicate Entries Fees					-0.20	0.0000	-32.00		
Line item previously billed									
77	12/03/2019	L343	02	draft correspondence from expert re: addendum to report	0.10	160.0000	16.00	Fee	U
78	12/03/2019	L343	02	review correspondence from expert re: addendum to report	0.10	160.0000	16.00	Fee	U
79	12/05/2019	L344	02	draft correspondence to company re: expert invoices	0.10	160.0000	16.00	Fee	U
80	12/05/2019	L344	02	review correspondence from expert re: invoices	0.10	160.0000	16.00	Fee	U
Deduction: Non-billable Tasks \ Clerical/Secretarial					-0.10		-16.00		
The receipt, review, processing, and/or forwarding of vendor invoices is a clerical/administrative task.									
81	12/09/2019	L343	02	Communicate (other external) correspondence to expert re: expert report/status	0.10	160.0000	16.00	Fee	U
82	12/09/2019	L343	02	Communicate (other external) correspondence to company re: expert report	0.10	160.0000	16.00	Fee	U
83	12/09/2019	L348	02	Communicate (other external) review correspondence from company re: expert report	0.10	160.0000	16.00	Fee	U
84	12/10/2019	L133	02	email to police practice expert re: status	0.10	160.0000	16.00	Fee	U
85	12/10/2019	L134	02	Review / Analyze email from police practice expert re: status	0.10	160.0000	16.00	Fee	U
86	12/11/2019	L344	02	Review / Analyze correspondence from company re: joining in police practice expert	0.10	160.0000	16.00	Fee	U
87	12/12/2019	L124	07	Review / Analyze file in preparation for future handling/strategy	0.30	75.0000	22.50	Fee	U

Bill Analysis Report

QBETPAS-NonGB/Y/S: 4676

#	Date	Task	TK	Narrative	Units	Rate	Amount	Type	Charge Type
Deduction: Other Fees					-0.30		-22.60		
The purpose or necessity of the task is not evident from the invoice.									
General document review for new timekeeper to "get up to speed" on a file is not billable.									
88	12/17/2019	L124	04	Review / Analyze e-mail from company re: status update; per adjusters M Yost & J Markel	0.10	160.0000	16.00	Fee	U
89	12/19/2019	L343	02	Draft / revise letter to plaintiff re: deposition of expert	0.20	160.0000	32.00	Fee	U
90	12/19/2019	L343	02	Draft / revise email to company re: status of discovery and future handling	0.20	160.0000	32.00	Fee	U



Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

August 12, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Att: Hector Olmo

Re: Insured: Borough of Wallington
Claimant: Polce, Victor
Policy No: QJP0102603
Claim No.: QM-1437

Dear Mr. Olmo,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's retention and coinsurance obligations to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Ryan Thomas at 215-443-3517 or thomas@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services
Alice Ivers for Ryan Thomas

cc: Paul Barbire, Esq.
Solicitor

Retention and Coinsurance Invoice (1)

Payment Due Date: 9/12/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	8/12/19
Claim Number:	QM-1437
Claimant:	Polce, Victor
Policy #:	QJP0102603

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$2,841.74 \$ 791.50 \$1,831.50	<u>\$5,464.74</u>

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Ryan Thomas

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

April 02, 2019

Invoice No. 1812

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4935 Polce v. Borough of Wallington

Claim Number: QM-1437

File Number: 24-4935

For Services Rendered Through 3/31/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
3/15/2019	DP	correspondence to plaintiff's counsel re: our handling of the defense/extension of time to answer	0.20	\$32.00
3/15/2019	DP	preparation of Stipulation Extending Time To Answer	0.10	\$16.00
3/15/2019	JB	Legal research re: R. 4:18-2 demands.	0.30	\$42.00
3/15/2019	JB	Review Complaint re: documents referenced by Plaintiff.	0.10	\$14.00
3/15/2019	JB	Prepare R. 4:18-2 demand to Plaintiff.	0.20	\$28.00
3/18/2019	DP	Receipt and review e-mailed from Boro Attorney re: frivolous pleadings	0.10	\$16.00
3/18/2019	DP	Receipt and review correspondence from Boro attorney to plaintiff/plaintiff's counsel re: frivolous pleadings	0.10	\$16.00
3/18/2019	DP	Receipt and review e-mail from Boro attorney re: motion to dismiss	0.10	\$16.00
3/19/2019	DP	Receipt and review initial file materials from company	0.40	\$64.00
3/19/2019	DP	Correspondence to company regarding initial evaluation	0.50	\$80.00

Continued On Next Page

Client Number: 20972024
Matter Number: 4935

4/2/2019
Page: 2

3/19/2019	DP	Correspondence to client regarding representation/client meeting	0.20	\$32.00
3/19/2019	DP	Telephone conference with Borough Attorney regarding claim/defense strategy	0.10	\$16.00
3/19/2019	DP	Commence partial preparation of Answer with defenses	0.80	\$128.00
3/20/2019	DP	Telephone conference with plaintiff re: Frivolous pleading letter/Stipulation	0.20	\$32.00
3/20/2019	DP	Telephone conference with Boro attorney re: defense strategy	0.20	\$32.00
3/22/2019	MM	review and analyze plaintiff's complaint in preparation for evaluating motion to dismiss	0.30	\$48.00
3/25/2019	MM	review CEPA case law/statute re: complaint and motion to dismiss	0.70	\$112.00
3/25/2019	MM	draft motion to dismiss certification and form of order	0.80	\$128.00
3/25/2019	MM	draft brief in support of motion to dismiss	2.80	\$448.00
3/26/2019	DP	Receipt and review e-mail from Boro attorney re: motion to dismiss	0.10	\$16.00
3/26/2019	MM	draft/revise brief in support of motion to dismiss	0.80	\$128.00
3/27/2019	DP	E-mail to Boro attorney re: motion to dismiss	0.10	\$16.00
3/27/2019	MM	review frivolous pleading letter and resolution to include language in motion	0.20	\$32.00
3/27/2019	MM	legal research CEPA and motions to dismiss	1.80	\$288.00
3/27/2019	MM	draft/revise certification in final form	0.40	\$64.00
3/27/2019	MM	draft/revise brief in support of motion to dismiss	3.10	\$496.00
3/28/2019	MM	finalize all motion papers and brief	1.20	\$192.00
3/29/2019	DP	Preparation of motion to dismiss in final form	0.50	\$80.00
3/29/2019	MM	review correspondence from court re: filed motion	0.10	\$16.00
3/29/2019	MM	draft email to Borough attorney re: motion to dismiss	0.20	\$32.00

Billable Hours / Fees:	16.70	\$2,660.00
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Continued On Next Page

Client Number: 20972024
Matter Number: 4935

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Timekeeper Summary

Timekeeper DP worked 3.70 hours at \$160.00 per hour, totaling \$592.00.

Timekeeper MM worked 12.40 hours at \$160.00 per hour, totaling \$1,984.00.

Timekeeper JB worked 0.60 hours at \$140.00 per hour, totaling \$84.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
3/29/2019	Courier Charges - Judge Gregg A. Padavano	\$6.74	
3/29/2019	Filing Fee - dispositive motion; first pleading	\$175.00	
	Total Costs	\$181.74	

Current Invoice Summary

Prior Balance:	\$0.00
Payments Received:	\$0.00
Unpaid Prior Balance:	\$0.00
Current Fees:	\$2,660.00
Advanced Costs:	\$181.74
TOTAL AMOUNT DUE:	\$2,841.74

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

May 02, 2019

Invoice No. 1893

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4935 Polce v. Borough of Wallington

Claim Number: QM-1437

File Number: 24-4935

For Services Rendered Through 4/30/2019.

<u>Date</u>	<u>Timekeeper</u>	<u>Fees</u> <u>Description</u>	<u>Hours</u>	<u>Amount</u>
4/10/2019	DP	Receipt and review Notice of Appearance from Boro Attorney	0.10	\$16.00
4/10/2019	DP	Receipt and review Boro Attorney's motion for partial summary judgement	0.20	\$32.00
4/10/2019	DP	Telephone conference with Boro Attorney re: appearance/motion	0.20	\$32.00
4/10/2019	DP	Correspondence to Boro Attorney re: motion for partial Summary Judgement	0.30	\$48.00
4/10/2019	MM	review text order from Court re: motion for partial sj	0.10	\$16.00
4/10/2019	MM	compare Borough attorney's Motion for Partial summary judgment to our motion to dismiss	0.40	\$64.00
4/18/2019	MM	review correspondence from Court re: filed cross motion	0.10	\$16.00
4/19/2019	MM	review and analyze plaintiff's opposition to motion to dismiss and cross motion to amend	0.40	\$64.00
4/19/2019	MM	draft reply/opposition brief	2.20	\$352.00
4/19/2019	MM	draft email to plaintiff re: cross motion	0.10	\$16.00
4/19/2019	MM	review correspondence from plaintiff re: cross motion	0.10	\$16.00

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Client Number: 20972024
Matter Number: 4935

5/2/2019
Page: 2

4/22/2019	DP	Telephone conference with Boro attorney re: second vote/motions	0.20	\$32.00
4/23/2019	MM	review correspondence from court re: motion status	0.10	\$16.00
4/24/2019	MM	draft/revise opposition to cross motion/reply to motion	1.40	\$224.00
4/24/2019	MM	review text order from court re: filed reply brief	0.10	\$16.00
4/24/2019	DB	telephone conference with Judge Padovano's Chambers re: Motion to Dismiss/Cross Motion to Amend Complaint	0.10	\$7.50
4/24/2019	MM	correspondence to Judge Padovano's chambers re: motion to dismiss/cross motion to amend complaint	0.20	\$32.00
4/25/2019	MM	preparation for oral argument our motion to dismiss	1.20	\$192.00
4/26/2019	MM	attendance at oral argument our Motion to Dismiss - Judge Padovano	2.60	\$416.00
4/26/2019	MM	legal research cases cited by plaintiff at oral argument	0.80	\$128.00
4/30/2019	MM	review text order from court re: filed opposition to summary judgement	0.10	\$16.00
4/30/2019	MM	review and analyze opposition to motion for sj	0.20	\$32.00
4/30/2019	MM	telephone conference with Officer Aguayo re: undercover investigation	0.30	\$48.00
Billable Hours / Fees:			11.50	\$1,831.50

Timekeeper Summary

Timekeeper DP worked 1.00 hours at \$160.00 per hour, totaling \$160.00.

Timekeeper MM worked 10.40 hours at \$160.00 per hour, totaling \$1,664.00.

Timekeeper DB worked 0.10 hours at \$75.00 per hour, totaling \$7.50.

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Client Number: 20972024
Matter Number: 4935

5/2/2019
Page: 3

Current Invoice Summary

Prior Balance:	\$2,841.74
Payments Received:	\$0.00
Unpaid Prior Balance:	<u>\$2,841.74</u>
Current Fees:	\$1,831.50
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	<u><u>\$4,673.24</u></u>

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.

Pfund McDonnell, P.C.

139 Prospect Street
2nd Floor
Ridgewood, NJ 07450
Telephone: 201-857-5040
Fax: 201-857-5041
Tax ID # 27-3179634

June 03, 2019
Invoice No. 1959

Summit Risk Services
Ryan Thomas
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Client Number: 20972024 Summit Risk Services
System ID: 4935 Polce v. Borough of Wallington
Claim Number: QM-1437
File Number: 24-4935

For Services Rendered Through 5/31/2019.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/7/2019	MM	review correspondence from Court re: motion adjournment	0.10	\$16.00
5/23/2019	YR	telephone conference with court re: summary judgment motion/oral argument	0.10	\$7.50
5/24/2019	MM	review correspondence from Court re: motion for sj	0.10	\$16.00
5/24/2019	MM	review correspondence from court re: reply brief to sj	0.10	\$16.00
5/28/2019	MM	preparation for oral argument summary judgment motion	1.00	\$160.00
5/29/2019	MM	attendance at oral argument before Judge Padavono - partial summary judgment	1.80	\$288.00
5/31/2019	MM	draft email to company re: status of oral argument, partial summary judgment	0.20	\$32.00
5/31/2019	JB	Review file in preparation of drafting first 90 day report to Company.	0.60	\$84.00
5/31/2019	JB	Prepare first 90 day report to Company.	1.20	\$168.00
Billable Hours / Fees:			5.20	\$787.50

Continued On Next Page

Client Number: 20972024
Matter Number: 4935

6/3/2019
Page: 2

Timekeeper Summary

Timekeeper MM worked 3.30 hours at \$160.00 per hour, totaling \$528.00.

Timekeeper JB worked 1.80 hours at \$140.00 per hour, totaling \$252.00.

Timekeeper YR worked 0.10 hours at \$75.00 per hour, totaling \$7.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
4/26/2019	parking fees - Bergen County Courthouse for motion to dismiss	\$4.00	
	Total Costs	\$4.00	

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
5/10/2019	Check Number - 6546 against Inv# 1812	(\$2,660.00)
5/10/2019	Check Number - 6546 against Inv# 1812	(\$181.74)
	Total Payments Received:	(\$2,841.74)

Current Invoice Summary

Prior Balance:	\$4,673.24	
Payments Received:	(\$2,841.74)	Last Payment: 5/10/2019
Unpaid Prior Balance:	\$1,831.50	
Current Fees:	\$787.50	
Advanced Costs:	\$4.00	
TOTAL AMOUNT DUE:	\$2,623.00	

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.



120 Gibraltar Road, Suite 210
Horsham, PA 19044

March 21, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057
Att: Jane Fontana

Re:	Insured:	Borough of Wallington
	Claimant:	Baginski, Witold
	Policy No:	QJP0102601
	Claim No.:	QM-0708

Dear Ms. Fontana,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's coinsurance obligation to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Jamie Bustamante at (215) 443-3540 or bustamante@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Jamie Bustamante

cc: Paul Barbire
South Bergen JIF Fund Attorney

Coinsurance Invoice (4)

Payment Due Date: 4/21/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	3/21/19
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$5,445.00 \$6,789.90	<u>\$2,446.98</u> 20% coinsurance obligation

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Jamie Bustamante

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Scott K. Seelagy, Esq.

Attorney at Law
95 Spring Brook Road
Morristown, NJ 07960

Invoice submitted to:

Ms. Jamie Bustamante
Summit Risk Services, Inc.
2 Walnut Grove Dr., Suite 210
Horsham PA 19044
United States of America

January 15, 2019

In Reference To: Witold Baginski v. Borough of Wallington, et als
Case Number: 2:17-cv-05320-JLL-LAD
Your Claim #: QM-0708

Invoice #54

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
11/20/2018 Receipt and review of email from the Court instructing defendants to respond to plaintiff's counsel's November 8, 2018 letter requesting permission to file an Amended Complaint.	0.10 150.00/hr	15.00
11/22/2018 E-mail to Mr. O'Connor requesting a phone conference to discuss the Court's instruction to respond to plaintiff's counsel's letter concerning the filing of an Amended Complaint.	0.10 150.00/hr	15.00
11/26/2018 Telephone conference with Mr. O'Connor regarding plaintiff's counsel's letter to the Court and the new allegations of retaliation against plaintiff; preparation of responsive letters to the Court.	0.50 150.00/hr	75.00
Prepare letter to the Court responding to plaintiff's letter dated November 8, 2018, requesting permission to file an Amended Complaint; e-file letter with the Court.	0.20 150.00/hr	30.00
Receipt and review of email from the Court transmitting the filed correspondence responding to plaintiff's counsel's letter requesting permission to file an Amended Complaint.	0.10 150.00/hr	15.00
Exchange of emails with Mr. O'Connor pertaining to his correspondence to the Court in reply to plaintiff's counsel's letter requesting permission to file an Amended Complaint.	0.20 150.00/hr	30.00
E-mail to all counsel transmitting correspondence filed with the Court in reply to plaintiff's counsel's letter of November 8, 2018, seeking permission to file an Amended Complaint.	0.10 150.00/hr	15.00
Receipt and review of email from the Court transmitting Mr. O'Connor's correspondence in response to plaintiff's counsel's letter of November 8, 2018, requesting permission to file an Amended Complaint.	0.10 150.00/hr	15.00

973-726-0059

	<u>Hrs/Rate</u>	<u>Amount</u>
11/28/2018 Receipt and review of email from the Court transmitting a Text Order advising that modifications to the discovery schedule and plaintiff's request to file an Amended Complaint will be addressed during the January 8, 2019 telephone conference.	0.10 150.00/hr	15.00
E-mail to Mr. O'Connor requesting a conference to discuss completing plaintiff's deposition prior to the January 8, 2019 telephone conference with the Court.	0.10 150.00/hr	15.00
Telephone conference with Mr. O'Connor regarding the Court's decision not to address discovery issues and plaintiff's proposed Amended Complaint until January 2019; agreement to schedule plaintiff's deposition prior to the scheduled telephone conference.	0.70 150.00/hr	105.00
11/30/2018 Receipt and review of email from the Court changing the time for the telephone status conference scheduled for January 8, 2019.	0.10 150.00/hr	15.00
Prepare letter to plaintiff's counsel and Notice to Take Deposition of plaintiff; email to all counsel.	0.30 150.00/hr	45.00
E-mail to Mr. Bustamante providing a status report regarding plaintiff's intention to file an Amended Complaint and the Court's scheduled telephone status conference on January 8, 2019.	0.30 150.00/hr	45.00
Exchange of emails with Councilwoman Dabal regarding plaintiff's intention to file an amended pleading, the scheduled status conference with the Court, the "Big Fish" email and events transpiring within the Borough.	0.30 150.00/hr	45.00
Telephone conference with Councilwoman Dabal regarding scheduling issues, plaintiff's intention to file an Amended Complaint, the "Big Fish" email, and discovery which remains outstanding from the Borough.	0.70 150.00/hr	105.00
12/2/2018 Receipt and review of email from Councilwoman Dabal regarding the "Big Fish" email, submission of an OPRA request to plaintiff, and Internal matters transpiring within the Borough.	0.20 150.00/hr	30.00
Telephone conference with Councilwoman Dabal to discuss the items in her email transmittal regarding submission of an OPRA request to the plaintiff, and events transpiring within the Borough.	0.40 150.00/hr	60.00
12/4/2018 Exchange of emails with Councilwoman Dabal regarding the "Big Fish" email and submission of an OPRA request to the Borough.	0.20 150.00/hr	30.00
Telephone conference with Councilwoman Dabal regarding plaintiff taking medical and vacation leave, plaintiff's deposition, telephone conference with Judge Dickson scheduled for January 8, 2019, tenure charges and other events transpiring within the Borough.	0.70 150.00/hr	105.00
E-mail to Councilwoman Dabal transmitting the "Big Fish" email; the lack of necessity to submit an OPRA request to the plaintiff.	0.20 150.00/hr	30.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018 Telephone conference with Councilwoman Dabal regarding the Borough's failure to respond to our First Request for Production; review of the items requested and specific items requiring a response from the Borough.	0.50 150.00/hr	75.00
Receipt and review of email from Councilwoman Dabal regarding a search of the Borough's email system for the "Big Fish" email.	0.10 150.00/hr	15.00
12/6/2018 Telephone conference with Mr. O'Connor regarding plaintiff's inability to appear for deposition prior to the status conference with Judge Dickson scheduled in January 2019.	0.30 150.00/hr	45.00
Receipt and review of email from Councilwoman Dabal transmitting an email from the IT Supervisor to Mr. Polce confirming that the Borough's email system does not contain the "Big Fish" email.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal regarding the IT Supervisor's email confirming that the Borough email system does not contain the "Big Fish" email; review of the clients' First Request for Production to the Borough; transmit email to client delineating the specific items that require a response from the Borough.	0.30 150.00/hr	45.00
Review the First Request for Production served upon the Borough; identify outstanding discovery items.	0.40 150.00/hr	60.00
Receipt and review of email from Councilwoman Dabal transmitting an email from the Borough Administrator regarding the Borough's response to the defendants' First Request for Production.	0.20 150.00/hr	30.00
Telephone conference with plaintiff's counsel to discuss the proposed Amended Complaint and plaintiff's inability to appear for deposition in December 2018.	0.40 150.00/hr	60.00
E-mail to plaintiff's counsel confirming plaintiff's inability to appear for deposition and agreement to provide the proposed Amended Complaint prior to the January 2019 status conference with Judge Dickson.	0.10 150.00/hr	15.00
12/10/2018 Receipt and review of email from Mr. Tandy alleging a new act of retaliation based upon plaintiff being "locked out" of his computer at work.	0.10 150.00/hr	15.00
E-mail to the clients transmitting Mr. Tandy's email alleging an additional act of retaliation based upon plaintiff being "locked out" of his computer at work.	0.10 150.00/hr	15.00
Telephone conference with Councilwoman Dabal regarding Mr. Tandy's email, plaintiff's prior complaints of retaliation to the Borough and the handling of those complaints.	0.70 150.00/hr	105.00
Telephone conference with Councilman Olkowski regarding Mr. Tandy's email, plaintiff's prior complaints of retaliation, and events transpiring within the Borough.	0.70 150.00/hr	105.00
Receipt and review of email from Mr. Tandy regarding plaintiff's return to work following medical leave; plaintiff's inability to access his computer and further retaliation against plaintiff.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/10/2018 E-mail to the clients transmitting Mr. Tandy's email concerning plaintiff's inability to access his computer and plaintiff's position that the "lockout" constitutes retaliation against him.	0.20 150.00/hr	30.00
Receipt and review of email from Councilman Olkowski regarding Mr. Tandy's email pertaining to plaintiff being locked out of his computer.	0.10 150.00/hr	15.00
Telephone conference with Councilwoman Dabal regarding Mr. Tandy's claims that plaintiff cannot access his work computer, the chronology of events involving an upgrade to the computer systems and passwords, and communications with plaintiff; plaintiff's failure to take appropriate steps to remedy the situation as he was instructed.	0.60 150.00/hr	90.00
12/11/2018 Receipt and review of email from Mr. Tandy setting forth additional alleged retaliatory conduct by the Borough and the clients against the plaintiff regarding his medical leave and being locked out of his computer.	0.10 150.00/hr	15.00
Exchange of emails with plaintiff's counsel regarding claims of recent retaliation and the Borough's response to plaintiff's concerns.	0.30 150.00/hr	45.00
E-mail to all clients regarding plaintiff's counsel's email alleging additional retaliation involving plaintiff's claims that he is "locked out" from his work computer and request for additional information concerning the issue complained of.	0.20 150.00/hr	30.00
Receipt and review of email from Councilwoman Dabal regarding the Borough's communications with plaintiff to remedy his claim of being "locked out" from his work computer.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal responding to her email about plaintiff's claim that he was "locked out" from his work computer.	0.10 150.00/hr	15.00
Receipt and review of email from Councilwoman Dabal regarding Mr. Polce's efforts to ensure that plaintiff had continued access to his work computer.	0.10 150.00/hr	15.00
Receipt and review of additional email from Mr. Tandy withdrawing any demand to settle the case; the Borough's investigation into plaintiff having taken medical leave and request for Mr. Corrigan's investigative report.	0.10 150.00/hr	15.00
12/12/2018 E-mail to the client transmitting Mr. Tandy's email withdrawing any offer of settlement and the need to document all events involving the plaintiff.	0.10 150.00/hr	15.00
Receipt and review of email from plaintiff's counsel advising that plaintiff allegedly cannot access his computer for a third straight day; additional claim of retaliation.	0.10 150.00/hr	15.00
E-mail to the client transmitting Mr. Tandy's email claiming that plaintiff has not been able to access his work computer for a third straight day.	0.10 150.00/hr	15.00
Receipt and review of an additional email from Mr. Tandy asserting that plaintiff cannot access his computer and claiming that plaintiff has been singled out and treated differently.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/12/2018 E-mail to the clients transmitting Mr. Tandy's email; request that the clients provide information confirming that the Borough is taking steps to document and address the situation involving plaintiff and his computer.	0.10 150.00/hr	15.00
Telephone conference with Mr. O'Connor concerning the need to address Mr. Tandy's allegations of retaliation involving plaintiff's work computer.	0.20 150.00/hr	30.00
Receipt and review of email from Mr. Tandy responding to Mr. O'Connor's email regarding the Borough's update to its security protocols and plaintiff's failure to follow instructions to access his computer.	0.10 150.00/hr	15.00
Receipt and review of email from Mr. O'Connor to plaintiff's counsel regarding communications with the BA confirming that the Borough had updated security protocols while plaintiff was on medical leave; the Borough advised plaintiff how to obtain a new password and access his computer; plaintiff's failure to follow directions.	0.40 150.00/hr	60.00
E-mail to the clients regarding discussions with Mr. O'Connor for the need to document and respond to Mr. Tandy's allegations concerning plaintiff's failure to access his computer and retaliation.	0.10 150.00/hr	15.00
E-mail to Mr. O'Connor regarding his email to Mr. Tandy responding to the allegations of plaintiff being locked out of his computer and retaliation.	0.10 150.00/hr	15.00
Exchange of emails with Mr. O'Connor regarding plaintiff's claims of being locked out of his computer and retaliation; the Borough's response to plaintiff's claims.	0.30 150.00/hr	45.00
12/13/2018 Telephone conference with Councilwoman Dabal regarding the Borough Council meeting involving tenure charges against the plaintiff; results of the meeting and future legal proceedings.	0.60 150.00/hr	90.00
Receipt and review of email from Mr. O'Connor transmitting an email from the Borough's IT person indicating that plaintiff has access to his work computer.	0.10 150.00/hr	15.00
12/14/2018 Telephone conference with Councilman Olkowski regarding the Borough's December 11, 2018, meeting relating to plaintiff's conduct; the impact of the items discussed at that meeting on the lawsuit; plaintiff's allegations of retaliation.	0.80 150.00/hr	120.00
12/19/2018 Telephone conference with Councilman Olkowski regarding a request for documentation from labor counsel pertaining to plaintiff; confirmation that discovery materials previously provided to all clients confirm plaintiff's failure to discharge his statutory duties relating to preparation of minutes, responding to OPRA requests, and abuse of overtime pay as confirmed in the NJ Comptroller's report.	1.00 150.00/hr	150.00
12/20/2018 Telephone conference with Councilwoman Dabal regarding internal Borough matters involving the police department.	0.70 150.00/hr	105.00
Receipt and review of email from Councilwoman Dabal regarding internal Borough matters.	0.30 150.00/hr	45.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/21/2018 Telephone conference with Councilwoman Dabal regarding labor counsel's investigation of plaintiff's conduct; the Borough's December 11, 2018 meeting involving plaintiff.	0.60 150.00/hr	90.00
12/29/2018 Receipt and review of email from Councilman Androwis regarding Internal Borough matters.	0.30 150.00/hr	45.00
12/31/2018 Telephone conference with Councilwoman Dabal regarding the upcoming status conference, plaintiff's proposed amendments to the Complaint, events occurring within the Borough and future proceedings.	0.70 150.00/hr	105.00
1/3/2019 Telephone conference with Councilwoman Dabal regarding the plaintiff's intention to file an Amended Complaint, the upcoming status conference with the Court, the procedure for filing the pleading, events occurring in the Borough.	0.50 150.00/hr	75.00
1/4/2019 Telephone conference with Councilman Olkowski regarding the Borough's re-organization meeting, termination of the BA and Borough Attorney; the re-hiring of Ms. Fontana as the BA; the vote of the Borough Council, the impact of these changes on the lawsuit and plaintiff's intention to file additional an Amended Complaint.	0.80 150.00/hr	120.00
1/7/2019 Telephone conference with Councilman Olkowski regarding the upcoming status conference with the Court, plaintiff's proposed amendments to the Complaint, events occurring within the Borough and future legal proceedings.	0.70 150.00/hr	105.00
Receipt and review of email from Mr. O'Connor regarding events which transpired at the Borough's re-organization meeting; information contained in newspaper articles.	0.10 150.00/hr	15.00
Telephone conference with Mr. O'Connor regarding the Borough's re-organization meeting, including termination of Mr. Polce as the BA, termination of the Borough Attorney, and the impact of the changes on the lawsuit; and plaintiff's intention to file an Amended Complaint.	0.70 150.00/hr	105.00
Telephone conference with Councilwoman Dabal regarding the Borough's re-organization meeting, termination of the BA and Borough Attorney; the vote of the Borough Council, the impact of these changes on the lawsuit and plaintiff's intention to file additional an Amended Complaint.	0.80 150.00/hr	120.00
Receipt and review of email from Councilwoman Dabal transmitting documentation concerning plaintiff's conduct as the Borough Clerk.	0.40 150.00/hr	60.00
1/8/2019 Telephone conference with Councilwoman Dabal regarding the upcoming status conference with the Court, plaintiff's proposed amendments to the Complaint, events occurring within the Borough and future legal proceedings.	0.50 150.00/hr	75.00
Exchange of emails with all counsel regarding the upcoming conference call with Judge Dickson.	0.20 150.00/hr	30.00
Attend the telephonic status conference with all counsel and Judge Dickson.	0.50 150.00/hr	75.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2019 E-mail to Mr. O'Connor regarding the Borough's decision to re-hire Ms. Fontana as the Business Administrator.	0.10 150.00/hr	15.00
Receipt and review of email from the Court regarding the telephone status conference held before Judge Dickson.	0.10 150.00/hr	15.00
Receipt and review of email from the Court transmitting a Text Order setting forth a deadline for the filing of plaintiff's proposed Amended Complaint and requesting a response from defendants confirming consent, or lack thereof, for plaintiff to file the proposed pleading.	0.10 150.00/hr	15.00
1/9/2019 Receipt and review of email from plaintiff's counsel transmitting the proposed Amended Complaint.	0.10 150.00/hr	15.00
Brief review of the Amended Complaint to determine how plaintiff restructured the proposed pleading given the allegations provided in phone conferences and emails; email to Mr. O'Connor regarding the additional counts containing claims of "Handicap Discrimination" and violations of the "FMLA".	0.20 150.00/hr	30.00
Receipt and review of email from Mr. O'Connor regarding the restructured, proposed Amended Complaint; his discussions with Ms. Bustamante updating her on recent events transpiring in the Borough and the conference call with Judge Dickson.	0.10 150.00/hr	15.00
Exchange of emails with Mr. O'Connor regarding his discussions with Ms. Bustamante about consenting, or not consenting to plaintiff filing the proposed Amended Complaint; the need to conduct legal research on the FMLA; communications with Ms. Bustamante.	0.30 150.00/hr	45.00
1/11/2019 Two telephone conferences with Councilwoman Dabal regarding the termination of the BA and Borough Attorney; the re-hiring of Ms. Fontana as the BA; the status conference with Judge Dickson; the procedures involved to either consent or file a motion to amend the pleading; plaintiff's proposed Amended Complaint and the impact of these events upon the lawsuit.	1.30 150.00/hr	195.00
Telephone conference with Councilman Olkowski regarding the termination of the BA and Borough Attorney; the re-hiring of Ms. Fontana as the BA; the status conference with Judge Dickson; scheduling of the meeting with labor counsel; plaintiff's intention to file a motion to amend his Complaint and the impact of these events upon the lawsuit.	0.90 150.00/hr	135.00
1/14/2019 Review the proposed Amended Complaint in detail; highlight portions of the pleading and identify different causes of action contained in each count.	1.40 150.00/hr	210.00
Conduct legal research on the Family Medical Leave Act (FMLA); highlight portions of the case law for future reference.	2.80 150.00/hr	420.00
E-mail to Councilman Androwis to request a phone conference to discuss the allegations contained in the proposed Amended Complaint and the status of the case.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/14/2019 Telephone conference with Councilman Androwis regarding plaintiff's allegations contained in the proposed Amended Complaint; request for a meeting to discuss the case in further detail.	0.20 150.00/hr	30.00
1/15/2019 Conduct legal research on the NJ Law Against Discrimination (NJ LAD) pertaining to plaintiff's additional allegations of retaliation based upon plaintiff's "handicap status"; highlight portions of the cases for future reference.	2.50 150.00/hr	375.00
Telephone conference with Mr. O'Connor to discuss the proposed Amended Complaint; the applicable case law related to those claims, and defense strategy.	1.00 150.00/hr	150.00
Conduct legal research: case law relating to plaintiff's claims of "political retaliation" under the First and 14th Amendments based upon the Borough's decision to obtain additional medical information to support plaintiff's medical leave.	1.30 150.00/hr	195.00
Receipt and review of email from Mr. O'Connor to all counsel confirming that the defendants consent to plaintiff filing the Amended Complaint, in lieu of filing a formal motion to amend.	0.10 150.00/hr	15.00
For professional services rendered	36.30	\$5,445.00
Previous balance		\$15,072.40
1/12/2019 Payment - Thank You		(\$15,072.40)
Total payments and adjustments		(\$15,072.40)
Balance due		\$5,445.00

Keenan & Doris

Attorneys at Law

71 Union Avenue, Suite 105, Rutherford, NJ 07070

[phone] 201-355-8110 [Fax] 201-355-8118

Summit Risk Services

220 Gibraltar Road, Suite 100

Horsham, Pennsylvania

19044

INVOICE

Date January 03, 2019

File No. 1005-47

Invoice No. 1797

Attention: Jamie Bustamante QM-0708

RE: Baginski v. Borough of Wallington

Professional services rendered from July 1, 2018 through October 31, 2018

SERVICES

Date		Description	Hrs
Jul-01-18	ICD	Comprehensive file review to prepare for attendance at settlement conference	1.50
Jul-02-18	ICD	Attendance at settlement conference	2.10
	DMG	Review and final revision of Defendant's responses to Plaintiff's Interrogatories	0.50
	DMG	Review and final revision of Defendants Responses to Plaintiff's Request for documents	0.50
	DMG	Preparation of correspondence to Plaintiff's Counsel and Co Counsel regarding Defendants' Responses to Plaintiff's Interrogatories, Document Requests, and document production	0.20
	DMG	Correspondence to Counsel regarding Defendant's supplemental document production	0.10
	DMG	Email from Court regarding minute entry proceedings	0.10
	DMG	Receipt, review and analysis of Order from the Court regarding discovery deadlines	0.20
	DMG	Preparation of status report regarding new developments	0.30
	DMG	Correspondence from Co Counsel regarding Defendants' responses	0.10

January 3, 2019

Invoice #: 1797

Page 2

	DMG	Email from Co Counsel regarding document production on behalf of individual defendants	0.10
	DMG	Correspondence from Plaintiff's Counsel regarding document production	0.10
Jul-03-18	DMG	Email to Counsel regarding Defendant's supplemental document production	0.10
	DMG	Email from Co Counsel regarding exchange of written discovery responses	0.10
Jul-04-18	DMG	Email from Counsel for individual defendants regarding the Borough's responses to Interrogatories and Request for Production of Documents	0.10
	DMG	Correspondence from Counsel for Individual Defendants to Plaintiff regarding Plaintiff's overdue discovery responses	0.00
	DMG	Receipt, review and analysis of deposition notice for Plaintiff	0.20
Jul-05-18	DMG	Email to Counsel for individual defendants regarding the Borough's responses to Interrogatories and Request for Production of Documents	0.10
Jul-06-18	DMG	Emails from and to Co Counsel regarding Plaintiff's document production	0.30
	DMG	Email to Business Administrator regarding status of settlement conference, IT emails, and Plaintiff's deposition	0.20
	TOC	Comprehensive file review in preparation of reviewing Co-Defendants' document production, and determine outstanding discovery	1.60
Jul-09-18	DMG	Emails from and to claims adjuster regarding new administrator for Borough of Wallington	0.20
	DMG	Email from Co Counsel supplementing discovery responses with certification of Defendant Dabal	0.10
	TOC	Receipt, review and analysis of Co-Defendant's responses to Plaintiff's document requests	2.60
Jul-10-18	DMG	Emails from and to BA regarding Plaintiff's personnel file	0.20
	DMG	Preparation of status report regarding Co-Defendant's discovery responses	1.30
	TOC	Review and analysis of and organization of documents produced by Co-Defendants (continued analysis)	1.90
	TOC	Receipt, review and analysis of Co-Defendants' interrogatory responses with documents	2.30

Jul-11-18	DMG	Preparation of correspondence letter to Victor Polce regarding original personnel file of Plaintiff	0.20
Jul-12-18	DMG	Preparation of status report regarding Co-Defendant's discovery responses	3.00
Jul-13-18	DMG	Receipt, review and analysis of correspondence to Plaintiff's Counsel from Co-Counsel regarding Plaintiff's overdue discovery responses	0.20
	DMG	Emails from and to Plaintiff's Counsel and Co Counsel regarding Plaintiff's overdue discovery	0.20
	DMG	Preparation of correspondence to Plaintiff's Counsel regarding Plaintiff's delinquent discovery and request for Court intervention	0.20
	DMG	Telephone conference with Co Counsel regarding Plaintiff's delinquent discovery responses	0.70
	DMG	Telephone conference with IT specialist regarding email retrieval	0.20
Jul-17-18	DMG	Review and revision of draft status report regarding Co-Defendants (8) sets of discovery responses and document production	2.40
	DMG	Emails from and to Counsel for Co Defendants regarding Plaintiff's delinquent discovery responses	0.20
Jul-18-18	DMG	Correspondence from Plaintiff's Counsel regarding Plaintiff's responses to Defendant Borough's rogs and Defendant Council Member's rogs	0.20
	DMG	Correspondence from Co Counsel to Plaintiff demanding responses to Defendants' Request for Production of Documents	0.10
Jul-19-18	DMG	Telephone conference with Co-Counsel regarding status of Plaintiff's discovery responses and Plaintiff's delinquent responses to the Request for Production of Documents	0.40
Aug-01-18	DMG	Receipt, review and analysis of correspondence from Co Counsel to Plaintiff regarding Plaintiff's delinquent responses to Defendants' document requests	0.20
	DMG	Emails from and to Co Counsel regarding IT document request	0.20
Aug-03-18	DMG	Correspondence from Plaintiff's Counsel regarding Plaintiff's responses to Co-Defendants' Notice to Produce	0.10
	DMG	Correspondence from Co Counsel regarding deposition notice for Plaintiff	0.10
	DMG	Emails from and to Plaintiff's Counsel regarding Plaintiff's deposition and remaining overdue discovery responses	0.20
Aug-06-18	DMG	Email from Plaintiff's Counsel regarding Plaintiff's discovery responses	0.10

	DMG	Receipt and preliminary review of Plaintiff's document production and responses to Borough's notice to produce	1.30
Aug-15-18	DMG	Telephone conference with BA's office regarding IT document production	0.10
Aug-29-18	DMG	Receipt, review and analysis of new deposition notice for Plaintiff	0.20
Aug-31-18	ICD	Review of new OPRA decision to determine need for responding to Plaintiff's discovery requests	0.70
Sep-17-18	KAS	Telephone conference with counsel for Council members regarding status of discovery	0.20
Sep-20-18	ICD	Receipt, review and analysis of new Third Circuit case on claims of First Amendment retaliation	1.30
Sep-24-18	KAS	Comprehensive file review to prepare for telephone conference with Magistrate Judge	0.60
	KAS	Telephone call to Victor Polce regarding production of IT discovery responses from co-defendant	0.10
	KAS	Correspondence to Victor Polce regarding production of IT discovery responses to co-defendant	0.20
	KAS	Telephone conference with co-defendant's counsel regarding Plaintiff's failure to move on discovery and telephone conference with Magistrate Judge	0.30
	KAS	Telephone conference with Magistrate Judge and all counsel regarding extension of discovery end date	0.20
Sep-25-18	ICD	Legal Research regarding Evidence rules and case law on character and opinion testimony to determine need to address at depositions	2.30
	KAS	Drafting of e-mail to co defendant's counsel regarding IT discovery responses	0.20
	KAS	Review and analysis of individual defendants' document request to Borough of Wallington	0.50
Sep-26-18	KAS	Telephone conference with Victor Polce regarding co-defendant's discovery requests	0.20
Oct-06-18	ICD	Telephone conference with client regarding updated factual investigation	0.30
Oct-08-18	ICD	Legal Research Legal Research regarding application of CEPA claim- need for actual violation (based on updated client information)	1.70
Oct-12-18	KAS	Drafting email to co-defense counsel regarding Borough's response to his document requests	0.20

Oct-24-18	TOC	Comprehensive file review for future handling and preparation of draft answer to discovery requests on our client	1.80
	TOC	Drafting responses to Co-Defendant's discovery demands	2.70
Oct-25-18	TOC	Telephone conference with Co-Defendant's counsel regarding facts of the case, viability of plaintiff's claims, scheduling depositions, outstanding discovery owed by Borough	1.10
	TOC	Telephone call to client, Victor Polce Borough Administrator, regarding scheduling a meeting to complete outstanding discovery requests	0.10
Oct-26-18	TOC	Receipt, review and analysis of Plaintiff's discovery responses (continued)	1.80
Oct-31-18	TOC	Telephone conference with Co-Defendant's counsel regarding deposition dates	0.30
	TOC	Telephone conference with co-defendant's counsel regarding upcoming depositions	0.70
	TOC	Emails to counsel regarding scheduling plaintiff's deposition	0.10
Total professional services rendered			45.20

DISBURSEMENTS

Jul-12-18	Courier - New Jersey Lawyers Service	9.90
	Totals	\$9.90
	Total Fee & Disbursements	\$6,789.90
	Previous Balance	8,542.95
	Previous Payments	8,542.95
	Balance Now Due	\$6,789.90

PAYMENT DETAILS

Sep-26-18	Fees for Professional Services Apex Ck#4826	8,542.95
Fee Summary:		
Lawyer	Hours	Rate
Ian C. Doris	9.90	\$150.00
		Amount
		\$1,485.00

January 3, 2019
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Debra McGarvey	15.60	\$150.00	\$2,340.00
Kelly Smith	2.70	\$150.00	\$405.00
Timothy O'Connor	17.00	\$150.00	\$2,550.00



120 Gibraltar Road, Suite 210
Horsham, PA 19044

July 15, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057
Att: Hector Olmo

Re:	Insured:	Borough of Wallington
	Claimant:	Baginski, Witold
	Policy No:	QJP0102601
	Claim No.:	QM-0708

Dear Mr. Olmo,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's coinsurance obligation to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Jamie Bustamante at (215) 443-3540 or bustamante@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Jamie Bustamante

cc: Paul Barbire
South Bergen JIF Fund Attorney

Coinsurance Invoice (6)

Payment Due Date: 8/15/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	7/15/19
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$870.00 \$420.00 \$555.00	<u>\$369.00</u> 20% coinsurance obligation

Payment Summary:

Retention Obligation paid by the Borough: \$10,000.00

Coinsurance Obligation paid to date by the Borough: \$10,025.51

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Jamie Bustamante

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

LAW OFFICE OF ROBERT J. GREENBAUM

Attorneys at Law
263 Winding Hill Drive
P.O. Box 446
Hackettstown, New Jersey 07840

(908) 684/4004
Fax (908) 684/4009
Robgreenbaum@Yahoo.com

May 1, 2019

Via Email (Bustamante@Summitrisk.com)

Jamie Bustamante
Summit Risk Services

Re: Baginski v. Wallington
Docket No.: 2:17-cv-05300-JLL-JAD
Claim No. QM-0708

INVOICE/

<u>Date</u>	<u>Description</u>	<u>Time</u>	<u>Rate</u>	<u>Value</u>
4/1/19	Prep. corresp. to client	.2	150	30.00
4/1/19	Receipt and review of corresp. from T. O'Connor re Consent order required by court	.2	150	30.00
4/1/19	Receipt and review of response from plaintiff	.2	150	30.00
4/1/19	Receipt and review of proposed form of order from plaintiff	.2	150	30.00
4/1/19	Receipt and review of response from S, Seelagy	.2	150	30.00
4/1/19	Receipt and review of response from T. O'Connor re Form of order	.2	150	30.00
4/1/19	Prep. response to plaintiff re form of order	.2	150	30.00
4/1/19	Receipt and review of response from plaintiff re filing Order	.2	150	30.00'
TOTALS		5.8	150	870.00
EXPENSES				

TOTAL DUE

\$870.00

Very truly yours,

/s/ Robert J. Greenbaum

LAW OFFICE OF ROBERT J. GREENBAUM

Attorneys at Law
263 Winding Hill Drive
P.O. Box 446
Hackettstown, New Jersey 07840

(908) 684/4004
Fax (908) 684/4009
Robgreenbaum@Yahoo.com

June 1, 2019

Via Email (Bustamante@Summitrisk.com)

Jamie Bustamante
Summit Risk Services

Re: Baginski v. Wallington
Docket No.: 2:17-cv-05300-JLL-JAD
Claim No. QM-0708

INVOICE/

<u>Date</u>	<u>Description</u>	<u>Time</u>	<u>Rate</u>	<u>Value</u>
5/1/19	Prep. corresp. to client	.2	150	30.00
5/16/19	Receipt and review of corresp. from client	.2	150	30.00
5/29/19	Receipt and review of order of reassignment from Court	.2	150	30.00
5/31/19	Review file re discovery produced to date	2.2	150	330.00
TOTALS		2.8	150	420.00
EXPENSES				

TOTAL DUE

\$420.00

Very truly yours,

/s/ Robert J. Greenbaum
ROBERT J. GREENBAUM

LAW OFFICE OF ROBERT J. GREENBAUM

Attorneys at Law
263 Winding Hill Drive
P.O. Box 446
Hackettstown, New Jersey 07840

(908) 684/4004
Fax (908) 684/4009
Robgreenbaum@Yahoo.com

May 1, 2019

Via Email (Bustamante@Summitrisk.com)

Jamie Bustamante
Summit Risk Services

Re: Baginski v. Wallington
Docket No.: 2:17-cv-05300-JLL-JAD
Claim No. QM-0708

INVOICE/

<u>Date</u>	<u>Description</u>	<u>Time</u>	<u>Rate</u>	<u>Value</u>
4/1/19	Prep. corresp. to client	.2	150	30.00
4/1/19	Receipt and review of corresp. from T. O'Connor re Consent order required by court	.2	150	30.00
4/1/19	Receipt and review of response from plaintiff	.2	150	30.00
4/1/19	Receipt and review of proposed form of order from plaintiff	.2	150	30.00
4/1/19	Receipt and review of response from S. Seelagy	.2	150	30.00
4/1/19	Receipt and review of response from T. O'Connor re Form of order	.2	150	30.00
4/1/19	Prep. response to plaintiff re form of order	.2	150	30.00
4/1/19	Receipt and review of response from plaintiff re filing Order	.2	150	30.00
4/2/19	Receipt and review of corresp. from S. Seelagy re Joint discovery plan	.2	150	30.00
4/2/19	Receipt and review of notice from court re joint discovery Plan	.2	150	30.00
4/2/19	Receipt and review of amended joint discovery plan from S. Seelagy	.2	150	30.00
4/2/19	Receipt and review of corresp. from plaintiff re discovery	.2	150	30.00
4/4/19	Receipt and review of amended scheduling order from court And date for case management conference	.2	150	30.00
4/16/19	Receipt and review of discovery served by S. Seelagy			

On plaintiff; Review file re same	.5	150	75.00
4/18/19Prep. corresp. to S. Seelagy re subpoena production	.2	150	30.00
4/18/19Receipt and review of response from S. Seelagy	.2	150	30.00
4/18/19Prep. response to S. Seelagy	.2	150	30.00
TOTALS	3.7	150	555.00
EXPENSES			

TOTAL DUE

\$555.00

Very truly yours,

/s/ Robert J. Greenbaum
ROBERT J. GREENBAUM



120 Gibraltar Road, Suite 210
Horsham, PA 19044

June 5, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057
Att: Jane Fontana

Re:	Insured:	Borough of Wallington
	Claimant:	Baginski, Witold
	Policy No:	QJP0102601
	Claim No.:	QM-0708

Dear Ms. Fontana,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's coinsurance obligation to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Jamie Bustamante at (215) 443-3540 or bustamante@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Jamie Bustamante

cc: Paul Barbire
South Bergen JIF Fund Attorney

Coinsurance Invoice (5)

Payment Due Date: 7/5/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	6/5/19
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$2,049.16	<u>\$409.83</u> 20% coinsurance obligation

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Jamie Bustamante

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

LAW OFFICE OF ROBERT J. GREENBAUM

Attorneys at Law
263 Winding Hill Drive
P.O. Box 446
Hackettstown, New Jersey 07840

(908) 684/4004
Fax (908) 684/4009
Robgreenbaum@Yahoo.com

March 1, 2019

Via Email (Bustamante@Summitrisk.com)

Jamie Bustamante
Summit Risk Services

Re: Baginski v. Wallington
Docket No.: 2:17-cv-05320-JLL-JAD
Claim No. QM-0708

INVOICE/

<u>Date</u>	<u>Description</u>	<u>Time</u>	<u>Rate</u>	<u>Value</u>
2/13/19	Call from Summit Risk re claim	.5	160	80.00
2/13/19	Receipt and review of file from Summit Risk	1.0	160	160.00
2/13/19	Prep. corresp. to J. Bustamante acknowledging Receipt of file	.2	160	32.00
2/13/19	Call to client re claim; Prep. memo to file	.5	160	80.00
2/13/19	Call to T. O'Connor	.2	160	32.00
2/13/19	Prep. corresp. to client re meeting	.2	160	32.00
2/13/19	Receipt and review of plaintiff's prior discovery responses from co-defendant	1.5	160	240.00
2/15/19	Prep. and file answer to amended complaint	1.2	160	192.00
2/15/19	Receipt and review of notice from court re filing	.2	160	32.00
2/15/19	Receipt and review of answer to amend complaint by Borough of Wallington	.2	160	32.00
2/18/19	Receipt and review of corresp. from S. Seelagy re Subpoena	.2	160	32.00
2/18/19	Prep. response to S. Seelagy	.2	160	32.00
2/18/19	Receipt and review of reply from S. Seelagy encl. subpoena	.2	160	32.00
2/18/19	Prep. reply to S. Seelagy	.2	160	32.00
2/18/19	Prep. corresp. to client re meeting	.2	160	32.00
2/18/19	Receipt and review of response from client re meeting	.2	160	32.00
2/18/19	Prep. reply to client confirming meeting	.2	160	32.00

2/18/19 Receipt and review of response from client	.2	160	32.00
2/19/19 Receipt and review of corresp. from client re			
Location of meeting	.2	160	32.00
2/19/19 Prep. response to client	.2	160	32.00
2/19/19 Receipt and review of corresp. from client			
Changing time of meeting	.2	160	32.00
2/19/19 Prep. response to client	.2	160	32.00
2/19/19 Receipt and review of reply from client	.2	160	32.00
2/19/19 Receipt and review of corresp. from client re meeting	.2	160	32.00
2/19/19 Prep. response to client	.2	160	32.00
2/19/19 Prep. for, travel to and attend interview of client	4.2	160	672.00
2/19/19 Receipt and review of corresp. from plaintiff re			
Documents	.2	160	32.00
2/19/19 Receipt and review of corresp. from S. Seelagy to			
plaintiff re documents	.2	160	32.00
2/28/19 Receipt and review of corresp. from court re			
Conf.	.2	160	32.00

TOTALS
EXPENSES

13.5 ~~160~~ 2160.00 \$21025
150

2/19/19 Meeting related expenses

\$24.16

TOTAL DUE

~~\$2,184.16~~

Very truly yours,

\$2,049.16

/s/ Robert J. Greenbaum
ROBERT J. GREENBAUM



120 Gibraltar Road, Suite 210
Horsham, PA 19044

March 21, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057
Att: Jane Fontana

Re: **Insured:** Borough of Wallington
 Claimant: Baginski, Witold
 Policy No: QJP0102601
 Claim No.: QM-0708

Dear Ms. Fontana,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's coinsurance obligation to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Jamie Bustamante at (215) 443-3540 or bustamante@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Jamie Bustamante

cc: Paul Barbire
 South Bergen JIF Fund Attorney

Coinsurance Invoice (4)

Payment Due Date: 4/21/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

Invoice Date:	3/21/19
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$5,445.00 \$6,789.90	<u>\$2,446.98</u> 20% coinsurance obligation

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Jamie Bustamante

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT

Scott K. Seelagy, Esq.

Attorney at Law
95 Spring Brook Road
Morristown, NJ 07960

Invoice submitted to:

Ms. Jamie Bustamante
Summit Risk Services, Inc.
2 Walnut Grove Dr., Suite 210
Horsham PA 19044
United States of America

January 15, 2019

In Reference To: Witold Baginski v. Borough of Wallington, et als
Case Number: 2:17-cv-05320-JLL-LAD
Your Claim #: QM-0708

Invoice #54

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
11/20/2018 Receipt and review of email from the Court instructing defendants to respond to plaintiff's counsel's November 8, 2018 letter requesting permission to file an Amended Complaint.	0.10 150.00/hr	15.00
11/22/2018 E-mail to Mr. O'Connor requesting a phone conference to discuss the Court's instruction to respond to plaintiff's counsel's letter concerning the filing of an Amended Complaint.	0.10 150.00/hr	15.00
11/26/2018 Telephone conference with Mr. O'Connor regarding plaintiff's counsel's letter to the Court and the new allegations of retaliation against plaintiff; preparation of responsive letters to the Court.	0.50 150.00/hr	75.00
Prepare letter to the Court responding to plaintiff's letter dated November 8, 2018, requesting permission to file an Amended Complaint; e-file letter with the Court.	0.20 150.00/hr	30.00
Receipt and review of email from the Court transmitting the filed correspondence responding to plaintiff's counsel's letter requesting permission to file an Amended Complaint.	0.10 150.00/hr	15.00
Exchange of emails with Mr. O'Connor pertaining to his correspondence to the Court in reply to plaintiff's counsel's letter requesting permission to file an Amended Complaint.	0.20 150.00/hr	30.00
E-mail to all counsel transmitting correspondence filed with the Court in reply to plaintiff's counsel's letter of November 8, 2018, seeking permission to file an Amended Complaint.	0.10 150.00/hr	15.00
Receipt and review of email from the Court transmitting Mr. O'Connor's correspondence in response to plaintiff's counsel's letter of November 8, 2018, requesting permission to file an Amended Complaint.	0.10 150.00/hr	15.00

973-726-0059

	<u>Hrs/Rate</u>	<u>Amount</u>
11/28/2018 Receipt and review of email from the Court transmitting a Text Order advising that modifications to the discovery schedule and plaintiff's request to file an Amended Complaint will be addressed during the January 8, 2019 telephone conference.	0.10 150.00/hr	15.00
E-mail to Mr. O'Connor requesting a conference to discuss completing plaintiff's deposition prior to the January 8, 2019 telephone conference with the Court.	0.10 150.00/hr	15.00
Telephone conference with Mr. O'Connor regarding the Court's decision not to address discovery issues and plaintiff's proposed Amended Complaint until January 2019; agreement to schedule plaintiff's deposition prior to the scheduled telephone conference.	0.70 150.00/hr	105.00
11/30/2018 Receipt and review of email from the Court changing the time for the telephone status conference scheduled for January 8, 2019.	0.10 150.00/hr	15.00
Prepare letter to plaintiff's counsel and Notice to Take Deposition of plaintiff; email to all counsel.	0.30 150.00/hr	45.00
E-mail to Mr. Bustamante providing a status report regarding plaintiff's intention to file an Amended Complaint and the Court's scheduled telephone status conference on January 8, 2019.	0.30 150.00/hr	45.00
Exchange of emails with Councilwoman Dabal regarding plaintiff's intention to file an amended pleading, the scheduled status conference with the Court, the "Big Fish" email and events transpiring within the Borough.	0.30 150.00/hr	45.00
Telephone conference with Councilwoman Dabal regarding scheduling issues, plaintiff's intention to file an Amended Complaint, the "Big Fish" email, and discovery which remains outstanding from the Borough.	0.70 150.00/hr	105.00
12/2/2018 Receipt and review of email from Councilwoman Dabal regarding the "Big Fish" email, submission of an OPRA request to plaintiff, and internal matters transpiring within the Borough.	0.20 150.00/hr	30.00
Telephone conference with Councilwoman Dabal to discuss the items in her email transmittal regarding submission of an OPRA request to the plaintiff, and events transpiring within the Borough.	0.40 150.00/hr	60.00
12/4/2018 Exchange of emails with Councilwoman Dabal regarding the "Big Fish" email and submission of an OPRA request to the Borough.	0.20 150.00/hr	30.00
Telephone conference with Councilwoman Dabal regarding plaintiff taking medical and vacation leave, plaintiff's deposition, telephone conference with Judge Dickson scheduled for January 8, 2019, tenure charges and other events transpiring within the Borough.	0.70 150.00/hr	105.00
E-mail to Councilwoman Dabal transmitting the "Big Fish" email; the lack of necessity to submit an OPRA request to the plaintiff.	0.20 150.00/hr	30.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/5/2018 Telephone conference with Councilwoman Dabal regarding the Borough's failure to respond to our First Request for Production; review of the items requested and specific items requiring a response from the Borough.	0.50 150.00/hr	75.00
Receipt and review of email from Councilwoman Dabal regarding a search of the Borough's email system for the "Big Fish" email.	0.10 150.00/hr	15.00
12/6/2018 Telephone conference with Mr. O'Connor regarding plaintiff's inability to appear for deposition prior to the status conference with Judge Dickson scheduled in January 2019.	0.30 150.00/hr	45.00
Receipt and review of email from Councilwoman Dabal transmitting an email from the IT Supervisor to Mr. Polce confirming that the Borough's email system does not contain the "Big Fish" email.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal regarding the IT Supervisor's email confirming that the Borough email system does not contain the "Big Fish" email; review of the clients' First Request for Production to the Borough; transmit email to client delineating the specific items that require a response from the Borough.	0.30 150.00/hr	45.00
Review the First Request for Production served upon the Borough; identify outstanding discovery items.	0.40 150.00/hr	60.00
Receipt and review of email from Councilwoman Dabal transmitting an email from the Borough Administrator regarding the Borough's response to the defendants' First Request for Production.	0.20 150.00/hr	30.00
Telephone conference with plaintiff's counsel to discuss the proposed Amended Complaint and plaintiff's inability to appear for deposition in December 2018.	0.40 150.00/hr	60.00
E-mail to plaintiff's counsel confirming plaintiff's inability to appear for deposition and agreement to provide the proposed Amended Complaint prior to the January 2019 status conference with Judge Dickson.	0.10 150.00/hr	15.00
12/10/2018 Receipt and review of email from Mr. Tandy alleging a new act of retaliation based upon plaintiff being "locked out" of his computer at work.	0.10 150.00/hr	15.00
E-mail to the clients transmitting Mr. Tandy's email alleging an additional act of retaliation based upon plaintiff being "locked out" of his computer at work.	0.10 150.00/hr	15.00
Telephone conference with Councilwoman Dabal regarding Mr. Tandy's email, plaintiff's prior complaints of retaliation to the Borough and the handling of those complaints.	0.70 150.00/hr	105.00
Telephone conference with Councilman Olkowski regarding Mr. Tandy's email, plaintiff's prior complaints of retaliation, and events transpiring within the Borough.	0.70 150.00/hr	105.00
Receipt and review of email from Mr. Tandy regarding plaintiff's return to work following medical leave; plaintiff's inability to access his computer and further retaliation against plaintiff.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/10/2018 E-mail to the clients transmitting Mr. Tandy's email concerning plaintiff's inability to access his computer and plaintiff's position that the "lockout" constitutes retaliation against him.	0.20 150.00/hr	30.00
Receipt and review of email from Councilman Olkowski regarding Mr. Tandy's email pertaining to plaintiff being locked out of his computer.	0.10 150.00/hr	15.00
Telephone conference with Councilwoman Dabal regarding Mr. Tandy's claims that plaintiff cannot access his work computer, the chronology of events involving an upgrade to the computer systems and passwords, and communications with plaintiff; plaintiff's failure to take appropriate steps to remedy the situation as he was instructed.	0.60 150.00/hr	90.00
12/11/2018 Receipt and review of email from Mr. Tandy setting forth additional alleged retaliatory conduct by the Borough and the clients against the plaintiff regarding his medical leave and being locked out of his computer.	0.10 150.00/hr	15.00
Exchange of emails with plaintiff's counsel regarding claims of recent retaliation and the Borough's response to plaintiff's concerns.	0.30 150.00/hr	45.00
E-mail to all clients regarding plaintiff's counsel's email alleging additional retaliation involving plaintiff's claims that he is "locked out" from his work computer and request for additional information concerning the issue complained of.	0.20 150.00/hr	30.00
Receipt and review of email from Councilwoman Dabal regarding the Borough's communications with plaintiff to remedy his claim of being "locked out" from his work computer.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal responding to her email about plaintiff's claim that he was "locked out" from his work computer.	0.10 150.00/hr	15.00
Receipt and review of email from Councilwoman Dabal regarding Mr. Polce's efforts to ensure that plaintiff had continued access to his work computer.	0.10 150.00/hr	15.00
Receipt and review of additional email from Mr. Tandy withdrawing any demand to settle the case; the Borough's investigation into plaintiff having taken medical leave and request for Mr. Corrigan's investigative report.	0.10 150.00/hr	15.00
12/12/2018 E-mail to the client transmitting Mr. Tandy's email withdrawing any offer of settlement and the need to document all events involving the plaintiff.	0.10 150.00/hr	15.00
Receipt and review of email from plaintiff's counsel advising that plaintiff allegedly cannot access his computer for a third straight day; additional claim of retaliation.	0.10 150.00/hr	15.00
E-mail to the client transmitting Mr. Tandy's email claiming that plaintiff has not been able to access his work computer for a third straight day.	0.10 150.00/hr	15.00
Receipt and review of an additional email from Mr. Tandy asserting that plaintiff cannot access his computer and claiming that plaintiff has been singled out and treated differently.	0.10 150.00/hr	15.00

		<u>Hrs/Rate</u>	<u>Amount</u>
12/12/2018	E-mail to the clients transmitting Mr. Tandy's email; request that the clients provide information confirming that the Borough is taking steps to document and address the situation involving plaintiff and his computer.	0.10 150.00/hr	15.00
	Telephone conference with Mr. O'Connor concerning the need to address Mr. Tandy's allegations of retaliation involving plaintiff's work computer.	0.20 150.00/hr	30.00
	Receipt and review of email from Mr. Tandy responding to Mr. O'Connor's email regarding the Borough's update to its security protocols and plaintiff's failure to follow instructions to access his computer.	0.10 150.00/hr	15.00
	Receipt and review of email from Mr. O'Connor to plaintiff's counsel regarding communications with the BA confirming that the Borough had updated security protocols while plaintiff was on medical leave; the Borough advised plaintiff how to obtain a new password and access his computer; plaintiff's failure to follow directions.	0.40 150.00/hr	60.00
	E-mail to the clients regarding discussions with Mr. O'Connor for the need to document and respond to Mr. Tandy's allegations concerning plaintiff's failure to access his computer and retaliation.	0.10 150.00/hr	15.00
	E-mail to Mr. O'Connor regarding his email to Mr. Tandy responding to the allegations of plaintiff being locked out of his computer and retaliation.	0.10 150.00/hr	15.00
	Exchange of emails with Mr. O'Connor regarding plaintiff's claims of being locked out of his computer and retaliation; the Borough's response to plaintiff's claims.	0.30 150.00/hr	45.00
12/13/2018	Telephone conference with Councilwoman Dabal regarding the Borough Council meeting involving tenure charges against the plaintiff; results of the meeting and future legal proceedings.	0.60 150.00/hr	90.00
	Receipt and review of email from Mr. O'Connor transmitting an email from the Borough's IT person indicating that plaintiff has access to his work computer.	0.10 150.00/hr	15.00
12/14/2018	Telephone conference with Councilman Olkowski regarding the Borough's December 11, 2018, meeting relating to plaintiff's conduct; the impact of the items discussed at that meeting on the lawsuit; plaintiff's allegations of retaliation.	0.80 150.00/hr	120.00
12/19/2018	Telephone conference with Councilman Olkowski regarding a request for documentation from labor counsel pertaining to plaintiff; confirmation that discovery materials previously provided to all clients confirm plaintiff's failure to discharge his statutory duties relating to preparation of minutes, responding to OPRA requests, and abuse of overtime pay as confirmed in the NJ Comptroller's report.	1.00 150.00/hr	150.00
12/20/2018	Telephone conference with Councilwoman Dabal regarding internal Borough matters involving the police department.	0.70 150.00/hr	105.00
	Receipt and review of email from Councilwoman Dabal regarding internal Borough matters.	0.30 150.00/hr	45.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/21/2018 Telephone conference with Councilwoman Dabal regarding labor counsel's investigation of plaintiff's conduct; the Borough's December 11, 2018 meeting involving plaintiff.	0.60 150.00/hr	90.00
12/29/2018 Receipt and review of email from Councilman Androwis regarding internal Borough matters.	0.30 150.00/hr	45.00
12/31/2018 Telephone conference with Councilwoman Dabal regarding the upcoming status conference, plaintiff's proposed amendments to the Complaint, events occurring within the Borough and future proceedings.	0.70 150.00/hr	105.00
1/3/2019 Telephone conference with Councilwoman Dabal regarding the plaintiff's intention to file an Amended Complaint, the upcoming status conference with the Court, the procedure for filing the pleading, events occurring in the Borough.	0.50 150.00/hr	75.00
1/4/2019 Telephone conference with Councilman Olkowski regarding the Borough's re-organization meeting, termination of the BA and Borough Attorney; the re-hiring of Ms. Fontana as the BA; the vote of the Borough Council, the impact of these changes on the lawsuit and plaintiff's intention to file additional an Amended Complaint.	0.80 150.00/hr	120.00
1/7/2019 Telephone conference with Councilman Olkowski regarding the upcoming status conference with the Court, plaintiff's proposed amendments to the Complaint, events occurring within the Borough and future legal proceedings.	0.70 150.00/hr	105.00
Receipt and review of email from Mr. O'Connor regarding events which transpired at the Borough's re-organization meeting; information contained in newspaper articles.	0.10 150.00/hr	15.00
Telephone conference with Mr. O'Connor regarding the Borough's re-organization meeting, including termination of Mr. Polce as the BA, termination of the Borough Attorney, and the impact of the changes on the lawsuit; and plaintiff's intention to file an Amended Complaint.	0.70 150.00/hr	105.00
Telephone conference with Councilwoman Dabal regarding the Borough's re-organization meeting, termination of the BA and Borough Attorney; the vote of the Borough Council, the impact of these changes on the lawsuit and plaintiff's intention to file additional an Amended Complaint.	0.80 150.00/hr	120.00
Receipt and review of email from Councilwoman Dabal transmitting documentation concerning plaintiff's conduct as the Borough Clerk.	0.40 150.00/hr	60.00
1/8/2019 Telephone conference with Councilwoman Dabal regarding the upcoming status conference with the Court, plaintiff's proposed amendments to the Complaint, events occurring within the Borough and future legal proceedings.	0.50 150.00/hr	75.00
Exchange of emails with all counsel regarding the upcoming conference call with Judge Dickson.	0.20 150.00/hr	30.00
Attend the telephonic status conference with all counsel and Judge Dickson.	0.50 150.00/hr	75.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/8/2019 E-mail to Mr. O'Connor regarding the Borough's decision to re-hire Ms. Fontana as the Business Administrator.	0.10 150.00/hr	15.00
Receipt and review of email from the Court regarding the telephone status conference held before Judge Dickson.	0.10 150.00/hr	15.00
Receipt and review of email from the Court transmitting a Text Order setting forth a deadline for the filing of plaintiff's proposed Amended Complaint and requesting a response from defendants confirming consent, or lack thereof, for plaintiff to file the proposed pleading.	0.10 150.00/hr	15.00
1/9/2019 Receipt and review of email from plaintiff's counsel transmitting the proposed Amended Complaint.	0.10 150.00/hr	15.00
Brief review of the Amended Complaint to determine how plaintiff restructured the proposed pleading given the allegations provided in phone conferences and emails; email to Mr. O'Connor regarding the additional counts containing claims of "Handicap Discrimination" and violations of the "FMLA".	0.20 150.00/hr	30.00
Receipt and review of email from Mr. O'Connor regarding the restructured, proposed Amended Complaint; his discussions with Ms. Bustamante updating her on recent events transpiring in the Borough and the conference call with Judge Dickson.	0.10 150.00/hr	15.00
Exchange of emails with Mr. O'Connor regarding his discussions with Ms. Bustamante about consenting, or not consenting to plaintiff filing the proposed Amended Complaint; the need to conduct legal research on the FMLA; communications with Ms. Bustamante.	0.30 150.00/hr	45.00
1/11/2019 Two telephone conferences with Councilwoman Dabal regarding the termination of the BA and Borough Attorney; the re-hiring of Ms. Fontana as the BA; the status conference with Judge Dickson; the procedures involved to either consent or file a motion to amend the pleading; plaintiff's proposed Amended Complaint and the impact of these events upon the lawsuit.	1.30 150.00/hr	195.00
Telephone conference with Councilman Olkowski regarding the termination of the BA and Borough Attorney; the re-hiring of Ms. Fontana as the BA; the status conference with Judge Dickson; scheduling of the meeting with labor counsel; plaintiff's intention to file a motion to amend his Complaint and the impact of these events upon the lawsuit.	0.90 150.00/hr	135.00
1/14/2019 Review the proposed Amended Complaint in detail; highlight portions of the pleading and identify different causes of action contained in each count.	1.40 150.00/hr	210.00
Conduct legal research on the Family Medical Leave Act (FMLA); highlight portions of the case law for future reference.	2.80 150.00/hr	420.00
E-mail to Councilman Androwis to request a phone conference to discuss the allegations contained in the proposed Amended Complaint and the status of the case.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/14/2019 Telephone conference with Councilman Androwis regarding plaintiff's allegations contained in the proposed Amended Complaint; request for a meeting to discuss the case in further detail.	0.20 150.00/hr	30.00
1/15/2019 Conduct legal research on the NJ Law Against Discrimination (NJ LAD) pertaining to plaintiff's additional allegations of retaliation based upon plaintiff's "handicap status"; highlight portions of the cases for future reference.	2.50 150.00/hr	375.00
Telephone conference with Mr. O'Connor to discuss the proposed Amended Complaint; the applicable case law related to those claims, and defense strategy.	1.00 150.00/hr	150.00
Conduct legal research: case law relating to plaintiff's claims of "political retaliation" under the First and 14th Amendments based upon the Borough's decision to obtain additional medical information to support plaintiff's medical leave.	1.30 150.00/hr	195.00
Receipt and review of email from Mr. O'Connor to all counsel confirming that the defendants consent to plaintiff filing the Amended Complaint, in lieu of filing a formal motion to amend.	0.10 150.00/hr	15.00
For professional services rendered	36.30	\$5,445.00
Previous balance		\$15,072.40
1/12/2019 Payment - Thank You		(\$15,072.40)
Total payments and adjustments		(\$15,072.40)
Balance due		\$5,445.00

Keenan & Doris

Attorneys at Law

71 Union Avenue, Suite 105, Rutherford, NJ 07070
[phone] 201-355-8110 [Fax] 201-355-8118

INVOICE

Date January 03, 2019
File No. 1005-47
Invoice No. 1797

Summit Risk Services
220 Gibraltar Road, Suite 100
Horsham, Pennsylvania
19044

Attention: Jamie Bustamante QM-0708

RE: Baginski v. Borough of Wallington

Professional services rendered from July 1, 2018 through October 31, 2018

SERVICES

Date		Description	Hrs
Jul-01-18	ICD	Comprehensive file review to prepare for attendance at settlement conference	1.50
Jul-02-18	ICD	Attendance at settlement conference	2.10
	DMG	Review and final revision of Defendant's responses to Plaintiff's Interrogatories	0.50
	DMG	Review and final revision of Defendants Responses to Plaintiff's Request for documents	0.50
	DMG	Preparation of correspondence to Plaintiff's Counsel and Co Counsel regarding Defendants' Responses to Plaintiff's Interrogatories, Document Requests, and document production	0.20
	DMG	Correspondence to Counsel regarding Defendant's supplemental document production	0.10
	DMG	Email from Court regarding minute entry proceedings	0.10
	DMG	Receipt, review and analysis of Order from the Court regarding discovery deadlines	0.20
	DMG	Preparation of status report regarding new developments	0.30
	DMG	Correspondence from Co Counsel regarding Defendants' responses	0.10

January 3, 2019

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	DMG	Email from Co Counsel regarding document production on behalf of individual defendants	0.10
	DMG	Correspondence from Plaintiff's Counsel regarding document production	0.10
Jul-03-18	DMG	Email to Counsel regarding Defendant's supplemental document production	0.10
	DMG	Email from Co Counsel regarding exchange of written discovery responses	0.10
Jul-04-18	DMG	Email from Counsel for individual defendants regarding the Borough's responses to Interrogatories and Request for Production of Documents	0.10
	DMG	Correspondence from Counsel for Individual Defendants to Plaintiff regarding Plaintiff's overdue discovery responses	0.00
	DMG	Receipt, review and analysis of deposition notice for Plaintiff	0.20
Jul-05-18	DMG	Email to Counsel for individual defendants regarding the Borough's responses to Interrogatories and Request for Production of Documents	0.10
Jul-06-18	DMG	Emails from and to Co Counsel regarding Plaintiff's document production	0.30
	DMG	Email to Business Administrator regarding status of settlement conference, IT emails, and Plaintiff's deposition	0.20
	TOC	Comprehensive file review in preparation of reviewing Co-Defendants' document production, and determine outstanding discovery	1.60
Jul-09-18	DMG	Emails from and to claims adjuster regarding new administrator for Borough of Wallington	0.20
	DMG	Email from Co Counsel supplementing discovery responses with certification of Defendant Dabal	0.10
	TOC	Receipt, review and analysis of Co-Defendant's responses to Plaintiff's document requests	2.60
Jul-10-18	DMG	Emails from and to BA regarding Plaintiff's personnel file	0.20
	DMG	Preparation of status report regarding Co-Defendant's discovery responses	1.30
	TOC	Review and analysis of and organization of documents produced by Co-Defendants (continued analysis)	1.90
	TOC	Receipt, review and analysis of Co-Defendants' interrogatory responses with documents	2.30

January 3, 2019

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Jul-11-18	DMG	Preparation of correspondence letter to Victor Polce regarding original personnel file of Plaintiff	0.20
Jul-12-18	DMG	Preparation of status report regarding Co-Defendant's discovery responses	3.00
Jul-13-18	DMG	Receipt, review and analysis of correspondence to Plaintiff's Counsel from Co-Counsel regarding Plaintiff's overdue discovery responses	0.20
	DMG	Emails from and to Plaintiff's Counsel and Co Counsel regarding Plaintiff's overdue discovery	0.20
	DMG	Preparation of correspondence to Plaintiff's Counsel regarding Plaintiff's delinquent discovery and request for Court intervention	0.20
	DMG	Telephone conference with Co Counsel regarding Plaintiff's delinquent discovery responses	0.70
	DMG	Telephone conference with IT specialist regarding email retrieval	0.20
Jul-17-18	DMG	Review and revision of draft status report regarding Co-Defendants (8) sets of discovery responses and document production	2.40
	DMG	Emails from and to Counsel for Co Defendants regarding Plaintiff's delinquent discovery responses	0.20
Jul-18-18	DMG	Correspondence from Plaintiff's Counsel regarding Plaintiff's responses to Defendant Borough's rogs and Defendant Council Member's rogs	0.20
	DMG	Correspondence from Co Counsel to Plaintiff demanding responses to Defendants' Request for Production of Documents	0.10
Jul-19-18	DMG	Telephone conference with Co-Counsel regarding status of Plaintiff's discovery responses and Plaintiff's delinquent responses to the Request for Production of Documents	0.40
Aug-01-18	DMG	Receipt, review and analysis of correspondence from Co Counsel to Plaintiff regarding Plaintiff's delinquent responses to Defendants' document requests	0.20
	DMG	Emails from and to Co Counsel regarding IT document request	0.20
Aug-03-18	DMG	Correspondence from Plaintiff's Counsel regarding Plaintiff's responses to Co-Defendants' Notice to Produce	0.10
	DMG	Correspondence from Co Counsel regarding deposition notice for Plaintiff	0.10
	DMG	Emails from and to Plaintiff's Counsel regarding Plaintiff's deposition and remaining overdue discovery responses	0.20
Aug-06-18	DMG	Email from Plaintiff's Counsel regarding Plaintiff's discovery responses	0.10

	DMG	Receipt and preliminary review of Plaintiff's document production and responses to Borough's notice to produce	1.30
Aug-15-18	DMG	Telephone conference with BA's office regarding IT document production	0.10
Aug-29-18	DMG	Receipt, review and analysis of new deposition notice for Plaintiff	0.20
Aug-31-18	ICD	Review of new OPRA decision to determine need for responding to Plaintiff's discovery requests	0.70
Sep-17-18	KAS	Telephone conference with counsel for Council members regarding status of discovery	0.20
Sep-20-18	ICD	Receipt, review and analysis of new Third Circuit case on claims of First Amendment retaliation	1.30
Sep-24-18	KAS	Comprehensive file review to prepare for telephone conference with Magistrate Judge	0.60
	KAS	Telephone call to Victor Polce regarding production of IT discovery responses from co-defendant	0.10
	KAS	Correspondence to Victor Polce regarding production of IT discovery responses to co-defendant	0.20
	KAS	Telephone conference with co-defendant's counsel regarding Plaintiff's failure to move on discovery and telephone conference with Magistrate Judge	0.30
	KAS	Telephone conference with Magistrate Judge and all counsel regarding extension of discovery end date	0.20
Sep-25-18	ICD	Legal Research regarding Evidence rules and case law on character and opinion testimony to determine need to address at depositions	2.30
	KAS	Drafting of e-mail to co defendant's counsel regarding IT discovery responses	0.20
	KAS	Review and analysis of individual defendants' document request to Borough of Wallington	0.50
Sep-26-18	KAS	Telephone conference with Victor Polce regarding co-defendant's discovery requests	0.20
Oct-06-18	ICD	Telephone conference with client regarding updated factual investigation	0.30
Oct-08-18	ICD	Legal Research Legal Research regarding application of CEPA claim- need for actual violation (based on updated client information)	1.70
Oct-12-18	KAS	Drafting email to co-defense counsel regarding Borough's response to his document requests	0.20

Oct-24-18	TOC	Comprehensive file review for future handling and preparation of draft answer to discovery requests on our client	1.80
	TOC	Drafting responses to Co-Defendant's discovery demands	2.70
Oct-25-18	TOC	Telephone conference with Co-Defendant's counsel regarding facts of the case, viability of plaintiff's claims, scheduling depositions, outstanding discovery owed by Borough	1.10
	TOC	Telephone call to client, Victor Polce Borough Administrator, regarding scheduling a meeting to complete outstanding discovery requests	0.10
Oct-26-18	TOC	Receipt, review and analysis of Plaintiff's discovery responses (continued)	1.80
Oct-31-18	TOC	Telephone conference with Co-Defendant's counsel regarding deposition dates	0.30
	TOC	Telephone conference with co-defendant's counsel regarding upcoming depositions	0.70
	TOC	Emails to counsel regarding scheduling plaintiff's deposition	0.10
Total professional services rendered			45.20

DISBURSEMENTS

Jul-12-18	Courier - New Jersey Lawyers Service	9.90
	Totals	9.90
	Total Fee & Disbursements	\$6,789.90
	Previous Balance	8,542.95
	Previous Payments	8,542.95
	Balance Now Due	\$6,789.90

PAYMENT DETAILS

Sep-26-18	Fees for Professional Services Apex Ck#4826			8,542.95
Fee Summary:				
Lawyer	Hours	Rate	Amount	
Ian C. Doris	9.90	\$150.00	\$1,485.00	

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Debra McGarvey	15.60	\$150.00	\$2,340.00
Kelly Smith	2.70	\$150.00	\$405.00
Timothy O'Connor	17.00	\$150.00	\$2,550.00

Coinsurance Invoice (3)

Payment Due Date: 3/7/19

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

01-2030-20-1552-068

6621

Invoice Date:	2/7/19
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$15,072.40	<u>\$3,014.48</u> 20% coinsurance obligation

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Jamie Bustamante

#190913

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT



120 Gibraltar Road, Suite 210
Horsham, PA 19044

February 7, 2019

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057
Att: Victor Polce

Re:	Insured:	Borough of Wallington
	Claimant:	Baginski, Witold
	Policy No:	QJP0102601
	Claim No.:	QM-0708

Dear Mr. Polce,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's coinsurance obligation to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Jamie Bustamante at (215) 443-3540 or bustamante@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Jamie Bustamante

cc: Paul Barbire
South Bergen JIF Fund Attorney

Scott K. Seelagy, Esq.

Attorney at Law
95 Spring Brook Road
Morristown, NJ 07960

Invoice submitted to:

Ms. Jamie Bustamante
Summit Risk Services, Inc.
2 Walnut Grove Dr., Suite 210
Horsham PA 19044
United States of America

November 14, 2018

In Reference To: Witold Baginski v. Borough of Wallington, et als
Case Number: 2:17-cv-05320-JLL-LAD
Your Claim #: QM-0708

Invoice #46

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
6/21/2018 Exchange of emails with Councilman Androwis regarding the executed certification page as an attachment to his interrogatory answers.	0.20 150.00/hr	30.00
Exchange of emails with Ms. McGarvey regarding service of discovery responses to plaintiff's counsel.	0.20 150.00/hr	30.00
Exchange of emails with Ms. Bustamante regarding the settlement conference scheduled before Judge Dickson in US District Court on July 2, 2018.	0.20 150.00/hr	30.00
6/23/2018 E-mail to Councilwoman Dabal requesting the executed certification page to be appended to her answers to plaintiff's interrogatories.	0.10 150.00/hr	15.00
6/26/2018 Telephone conference with Ms. McGarvey regarding settlement options, the upcoming settlement conference, events affecting settlement prospects and discovery issues.	0.70 150.00/hr	105.00
Telephone conference with Councilwoman Dabal regarding her answers to the plaintiff's interrogatories and discussion concerning the upcoming settlement conference before Judge Dickson.	0.40 150.00/hr	60.00
Receipt and review of email from the Court transmitting a text order changing the time of the settlement conference before Judge Dickson.	0.10 150.00/hr	15.00
6/27/2018 Telephone conference with Councilman Rachelski requesting the certification page for his interrogatory answers and discussion concerning the upcoming settlement conference before Judge Dickson.	0.40 150.00/hr	60.00
E-mail to all clients confirming the time change for the settlement conference scheduled before Judge Dickson on July 2, 2018.	0.10 150.00/hr	15.00
6/28/2018 Telephone conference with Councilman Olkowski regarding his answers to the plaintiff's Interrogatories; request for the executed certification page to be appended to his interrogatory answers.	0.30 150.00/hr	45.00

973-726-0059

	<u>Hrs/Rate</u>	<u>Amount</u>
6/28/2018 Telephone conference with Ms. McGarvey regarding the status of settlement, discussion of issues to be raised during the conference, discovery issues and a request for the adjuster to appear telephonically before the Court.	0.70 150.00/hr	105.00
6/29/2018 Telephone conference with Ms. McGarvey regarding plaintiff's failure to serve discovery responses and the July 2, 2018 settlement conference.	0.30 150.00/hr	45.00
Telephone conference with Mr. Thomas regarding the upcoming settlement conference and discussion of events in the Borough and issues involving plaintiff's performance as affecting settlement.	0.40 150.00/hr	60.00
Prepare for settlement conference; review prior status reports and notes from earlier settlement conference; and draft a set of issues to be raised and discussed at the conference,	0.70 150.00/hr	105.00
Receipt and review of email from the Court transmitting filed correspondence from Ms. McGarvey requesting approval for the claims adjuster to appear telephonically at the settlement conference before Judge Dickson.	0.20 150.00/hr	30.00
6/30/2018 E-mail to Ms. McGarvey confirming that plaintiff failed to serve discovery as ordered by the Court; request for discovery responses from the Borough.	0.20 150.00/hr	30.00
Receipt and review of email from Ms. McGarvey confirming that plaintiff did not serve written discovery responses; request for a telephone conference to discuss the Borough's outstanding discovery responses.	0.10 150.00/hr	15.00
Telephone conference with Ms. McGarvey regarding issues preventing the Borough from responding to the defendant councilmembers' written discovery demands; the status of settlement, authority to settle and issues to be raised during the conference before Judge Dickson.	0.60 150.00/hr	90.00
Review recent case law defining an adverse employment consequence in CEPA actions, in preparation for the settlement conference before Judge Dickson.	0.40 150.00/hr	60.00
7/1/2018 Compile and organize attachments to accompany the defendant councilmembers' answers to plaintiff's Interrogatories and document demand; Bates stamp documents 1 - 202.	3.20 150.00/hr	480.00
7/2/2018 Conduct final review of each client's answers to plaintiff's interrogatories and responses to the plaintiff's First Request for Production (8 total sets of discovery responses); incorporate modifications to the discovery responses; prepare letter to plaintiff's counsel and email discovery responses to all counsel without Bates stamped attachments.	2.20 150.00/hr	330.00
Attend settlement conference before Judge Dickson in the US District Court, Newark, New Jersey; post-conference meeting with clients regarding the case and discovery issues.	3.80 150.00/hr	570.00
E-mail to all counsel transmitting Bates stamped documents 1-100 as attachments to defendants' interrogatory answers and response to the plaintiff's document demand.	0.20 150.00/hr	30.00

	<u>Hrs/Rate</u>	<u>Amount</u>
7/2/2018 E-mail to all counsel transmitting Bates stamped documents 101-202 as attachments to defendants' interrogatory answers and response to the plaintiff's document demand.	0.20 150.00/hr	30.00
Receipt and review of email from the Court containing a minute entry for the settlement conference held before Judge Dickson.	0.10 150.00/hr	15.00
Receipt and review of email from the Court containing a text order scheduling fact discovery until October 31, 2018; status conference scheduled for September 24, 2018.	0.10 150.00/hr	15.00
7/3/2018 E-mail to all counsel requesting outstanding responses to the defendants' interrogatories and First Request for Production.	0.10 150.00/hr	15.00
Email to Councilwoman Dabal requesting certification for her interrogatory answers.	0.10 150.00/hr	15.00
Receipt and review of text message from Councilwoman Dabal transmitting the executed certification.	0.20 150.00/hr	30.00
Receipt and review of email from Ms. McGarvey transmitting defendant Borough of Wallington's answers to the plaintiff's interrogatories; review and highlight portions of the answers for future proceedings.	1.20 150.00/hr	180.00
Receipt and review of email from Ms. McGarvey transmitting defendant Borough of Wallington's response to the plaintiff's Request for Production; review and highlight portions of the response for future proceedings.	0.80 150.00/hr	120.00
Receipt and review of email from Ms. McGarvey transmitting the Borough of Wallington's certified answers to plaintiff's interrogatories; cross-reference certain answers to allegations in the Complaint; review and highlight certain answers for future reference.	0.80 150.00/hr	120.00
Review the Borough of Wallington's response to the plaintiff's First Request for Production of Documents.	0.70 150.00/hr	105.00
E-mail to all counsel confirming that defendants served written discovery responses; request to counsel for discovery responses from the plaintiff and the Borough.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal requesting the signed certification to be supplied to counsel for the plaintiff and the Borough with her interrogatory answers.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey transmitting documents Bates stamped Wallington 132-281 as attachments to the Borough's written discovery responses.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey re-transmitting the Borough's responses to the plaintiff's Interrogatories and document demand.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
7/4/2018 E-mail to Ms. McGarvey requesting the Borough of Wallington's overdue response to the defendants' First Request for Production.	0.10 150.00/hr	15.00
Prepare Notice to Take Oral Deposition of plaintiff; email deposition notice to all counsel.	0.30 150.00/hr	45.00
E-mail to plaintiff's counsel demanding plaintiff's certified answers to the defendants' interrogatories and response to defendants' First Request for Production.	0.10 150.00/hr	15.00
7/5/2018 E-mail to Councilwoman Dabal requesting a more legible copy of her signed certification to be appended to her interrogatory answers.	0.10 150.00/hr	15.00
Receipt and review of email from Councilwoman Dabal transmitting executed certification page for her Interrogatory answers.	0.20 150.00/hr	30.00
E-mail to all counsel transmitting Councilwoman Dabal's certification for her Interrogatory answers previously served on counsel.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey re-transmitting defendant Borough's certified answers to the plaintiff's interrogatories and response to plaintiff's First Request for Production.	0.20 150.00/hr	30.00
E-mail to Ms. McGarvey reaffirming request for the Borough's response to defendants' First Request for Production.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey regarding the Borough's response to the defendants' First Request for Production.	0.10 150.00/hr	15.00
E-mail to plaintiff's counsel reaffirming the demand for plaintiff's overdue answers to interrogatories and response to the defendants' First Request for Production.	0.10 150.00/hr	15.00
Telephone conference with Ms. McGarvey regarding issues precluding the Borough from responding to defendants' Interrogatories and demand for documents.	0.40 150.00/hr	60.00
Receipt and review of email from plaintiff's counsel regarding service of plaintiff's overdue discovery responses.	0.10 150.00/hr	15.00
7/6/2018 Exchange of emails with Ms. McGarvey regarding plaintiff's outstanding discovery responses; plaintiff's counsel's service of Bates stamp documents to Ms. McGarvey on the morning of the settlement conference without providing any written discovery responses to the defendants' discovery demands.	0.20 150.00/hr	30.00
7/9/2018 Receipt and review of email from Councilwoman Dabal transmitting the executed certification page; letter to all counsel transmitting the executed certification.	0.20 150.00/hr	30.00
7/10/2018 Receipt and review of email from Ms. McGarvey transmitting Bates stamped documents 1-228 forwarded to her by plaintiff's counsel, without discovery responses from the plaintiff.	0.10 150.00/hr	15.00

Ms. Jamie Bustamante

	<u>Hrs/Rate</u>	<u>Amount</u>
7/10/2018 Receipt and review of email from Ms. McGarvey transmitting Bates stamped documents 229-713 forwarded to her by plaintiff's counsel, without discovery responses from the plaintiff.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey transmitting Bates stamped documents 714-1136 forwarded to her by plaintiff's counsel, without discovery responses from the plaintiff.	0.10 150.00/hr	15.00
7/11/2018 E-mail to Ms. McGarvey regarding plaintiff's failure to serve overdue discovery, scheduling of plaintiff for deposition, drafting a letter to the Court requesting in Order compelling plaintiff to produce discovery responses by a date certain.	0.20 150.00/hr	30.00
7/12/2018 Review the Borough's attachments its responses to the plaintiff's written discovery demands Bates stamped #132-181; organize and highlight portions of the documents for later use at plaintiff's deposition.	2.70 150.00/hr	405.00
7/13/2018 Review the Borough's attachments Bates stamped #182-231; organize and highlight portions of the documents for later use at plaintiff's deposition.	2.00 150.00/hr	300.00
E-mail to plaintiff's counsel demanding overdue answers to interrogatories and response to the defendants' demand for documents; service of defendants' notice to take depositions of plaintiff scheduled for August 2, 2018, letter to the Court compelling discovery by a date certain.	0.20 150.00/hr	30.00
Receipt and review of email from plaintiff's counsel regarding overdue discovery.	0.10 150.00/hr	15.00
E-mail to plaintiff's counsel regarding overdue discovery and a request for a firm date on which discovery responses will be provided.	0.10 150.00/hr	15.00
Telephone conference with plaintiff's counsel regarding overdue discovery responses, deposition of plaintiff and discovery proceedings.	0.40 150.00/hr	60.00
Receipt and review of email from Ms. McGarvey directed to plaintiff's counsel requesting overdue discovery to the Borough; letter to the Court regarding plaintiff's failure to serve discovery responses.	0.10 150.00/hr	15.00
7/16/2018 Telephone conference with Councilman Androwis regarding settlement discussions, the merits of plaintiff's case, status of discovery and future proceedings.	0.70 150.00/hr	105.00
Receipt and review of email from plaintiff's counsel confirming a date certain for service of plaintiff's written discovery responses.	0.10 150.00/hr	15.00
7/17/2018 Receipt and review of email from Ms. McGarvey transmitting Bates stamped documents #232-281; organize and highlight portions of the documents for later use at plaintiff's deposition.	2.30 150.00/hr	345.00
Exchange of emails with Ms. McGarvey regarding plaintiff's failure to serve discovery.	0.20 150.00/hr	30.00

	<u>Hrs/Rate</u>	<u>Amount</u>
7/18/2018 Receipt and review of email from Ms. McGarvey transmitting Bates stamped documents #282-381; organize a highlight portions of the documents for later use at plaintiff's deposition.	3.00 150.00/hr	450.00
Receipt and review of email from Ms. McGarvey transmitting Bates stamped documents #382-388; organize and highlight portions of the documents for later use at plaintiff's deposition.	0.40 150.00/hr	60.00
Receipt and review of plaintiff's certified answers to interrogatories propounded by the Borough of Wallington; review plaintiff's answers and highlight certain responses for future reference.	0.90 150.00/hr	135.00
Receipt and review of plaintiff's response to the document demand propounded by the Borough of Wallington; review and highlight certain responses for future reference.	0.80 150.00/hr	120.00
E-mails to all clients providing a case status regarding discovery and transmitting the plaintiff's certified answers to the Borough's interrogatories and interrogatories propounded by the individual councilmembers, sans plaintiff's Bates stamped documents 1-1136.	0.30 150.00/hr	45.00
Receipt and review of email from plaintiff's counsel transmitting plaintiff's certified answers to interrogatories propounded by the defendant councilmembers, without attachments; review and highlight portions of the interrogatory answers for future reference.	2.20 150.00/hr	330.00
Upload plaintiff's Bates stamped documents 1-1136 to Google Drive; email to clients transmitting a link to access the documents for review.	0.30 150.00/hr	45.00
E-mail to plaintiff's counsel requesting a response to the individual councilmembers' demand for the production of documents.	0.10 150.00/hr	15.00
7/19/2018 Telephone conference with Councilman Olkowski regarding plaintiff's answers to interrogatories, the merits of plaintiff's allegations and status of discovery.	0.70 150.00/hr	105.00
Telephone conference with Ms. McGarvey regarding plaintiff's interrogatory answers and plaintiff's failure to provide a response to defendants' document demand; plaintiff's deposition; the merits of filing of a motion to dismiss under Rule 12(c).	0.60 150.00/hr	90.00
7/20/2018 E-mail to plaintiff's counsel following up on the prior request for plaintiff's response to the individual councilmembers' demand for the production of documents; cancellation and re-scheduling of the plaintiff's deposition.	0.10 150.00/hr	15.00
7/21/2018 Receipt and review of email from Councilwoman Dabal requesting a re-transmittal of the plaintiff's answers to interrogatories.	0.10 150.00/hr	15.00
7/23/2018 E-mail to Councilwoman Dabal re-transmitting the plaintiff's certified answers to interrogatories propounded by the individual councilmembers and the Borough.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
7/28/2018 Receipt and review of email from Councilman Olkowski transmitting an email chain regarding training provided to the plaintiff about how to copy recordings on a CD-ROM from his computer.	0.20 150.00/hr	30.00
Telephone conference with Councilman Olkowski regarding the substance of his email transmittal, events occurring within the Borough, the scheduling of plaintiff's deposition and discussion of various issues in the lawsuit.	0.80 150.00/hr	120.00
7/29/2018 Receipt and review of email from Councilman Androwis regarding his review of plaintiff's Bates stamp documents, including the "Big Fish" email, transmittal of the police report regarding an Incident Involving Androwis and plaintiff's son Christopher Baginski.	0.30 150.00/hr	45.00
Receipt and review of a second email from Councilman Androwis regarding the envelope which contained the "Big Fish" email, and specific comments regarding the return address as proof the email was fabricated and orchestrated against the defendants.	0.20 150.00/hr	30.00
8/1/2018 E-mail to plaintiff's counsel demanding plaintiff's overdue response to the defendants' document demand; letter to the Court if discovery is not produced and scheduling of the plaintiff's deposition.	0.20 150.00/hr	30.00
Exchange of emails with Ms. McGarvey regarding plaintiff's failure to provide a response to the defendants' demand for documents; request for a response to the defendants' document demand from the Borough.	0.20 150.00/hr	30.00
8/3/2018 Telephone conference with Councilwoman Dabal regarding the status of discovery, events transpiring in the Borough and depositions of the plaintiff and others named as having knowledge of facts.	0.70 150.00/hr	105.00
Prepare Notice Take Oral Deposition of plaintiff; email deposition notice to all counsel.	0.30 150.00/hr	45.00
Receipt and review of email from plaintiff's counsel regarding service of the plaintiff's response to the defendants' demand for documents.	0.10 150.00/hr	15.00
Exchange of emails with plaintiff's counsel regarding the scheduling of plaintiff's deposition.	0.20 150.00/hr	30.00
Receipt and review of plaintiff's response to the defendants' First Request for Production.	1.30 150.00/hr	195.00
8/4/2018 Exchange of emails with plaintiff's counsel regarding the documents Bates stamped 1-1136; request for transmittal of all responsive documents in addition to those previously forwarded to counsel for the Borough.	0.20 150.00/hr	30.00
8/23/2018 Review and organize plaintiff's Bates stamped documents 1-228; categorize documents related to the various causes of action; remove duplicate documents; highlight portions of the documents in preparation for the plaintiff's deposition.	3.80 150.00/hr	570.00

	<u>Hrs/Rate</u>	<u>Amount</u>
8/24/2018 Review and organize plaintiff's Bates stamped documents 229-550; categorize documents related to the various causes of action; remove duplicate documents; highlight portions of the documents in preparation for the plaintiff's deposition.	4.20 150.00/hr	630.00
8/28/2018 Receipt and review of email from Councilwoman Dabal transmitting an email chain from the Civil Service Commission regarding plaintiff's employment history.	0.20 150.00/hr	30.00
Exchange of emails with Councilwoman Dabal regarding discovery and request for a telephone conference.	0.20 150.00/hr	30.00
Telephone conference with Councilwoman Dabal regarding plaintiff's discovery responses, the scheduling of plaintiff's deposition, events transpiring in the Borough and issues involved in the lawsuit.	0.70 150.00/hr	105.00
Telephone conference with Ms. McGarvey regarding the scheduling of plaintiff's deposition, defense strategy.	0.40 150.00/hr	60.00
Review and organize plaintiff's Bates stamped documents 551-800; categorize documents related to the various causes of action; remove duplicate documents; highlight portions of the documents in preparation for the plaintiff's deposition.	4.50 150.00/hr	675.00
8/29/2018 Prepare Notice to Take Oral Deposition of plaintiff; email deposition notice to all counsel and schedule court reporter.	0.30 150.00/hr	45.00
Receipt and review of email from Councilwoman Dabal transmitting an additional email chain regarding the Civil Service Commission and plaintiff's position as the appointing authority.	0.10 150.00/hr	15.00
8/30/2018 Review and organize plaintiff's Bates stamped documents 801-1000; categorize documents related to the various causes of action; remove duplicate documents; highlight portions of the documents in preparation for the plaintiff's deposition.	4.20 150.00/hr	630.00
8/31/2018 Review and organize plaintiff's Bates stamped documents 1001-1136; categorize documents related to the various causes of action; remove duplicate documents; highlight portions of the documents in preparation for the plaintiff's deposition.	1.70 150.00/hr	255.00
9/5/2018 Receipt and review of email from Councilwoman Dabal transmitting an email chain regarding communications between the plaintiff and labor Council pertaining to the plaintiff's refusal to be interviewed in connection with an investigation and performance evaluation.	0.10 150.00/hr	15.00
9/6/2018 E-mail to Councilwoman Dabal responding to the email chain involving plaintiff's insubordination and refusal to cooperate for an interview.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal regarding plaintiff's deposition and request for dates to meet to discuss the case and specific issues to be addressed during plaintiff's deposition.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
9/7/2018 Exchange of emails with plaintiff's counsel regarding plaintiff's deposition and the need to reschedule the deposition to a future date.	0.20 150.00/hr	30.00
9/13/2018 Exchange of emails with Kelly Smith, Esq., new counsel representing the Borough of Wallington regarding her request for a telephone conference to discuss the case.	0.20 150.00/hr	30.00
9/14/2018 Receipt and review of email from Ms. Smith confirming her handling of the file and the date for plaintiff's deposition.	0.10 150.00/hr	15.00
9/15/2018 E-mail to Ms. Smith regarding the scheduling of plaintiff's deposition, plaintiff's failure to timely serve written discovery responses, the scheduled telephone conference with the Court.	0.20 150.00/hr	30.00
9/17/2018 Exchange of emails with Ms. Smith regarding plaintiff's deposition and the upcoming telephone conference with the Court; request for a phone conference to discuss the Borough's outstanding discovery owed to the defendant councilmembers.	0.20 150.00/hr	30.00
Telephone conference with Ms. Smith to discuss the status of the case, each cause of action, scheduling of discovery including plaintiff's deposition, and defense strategy; discussion of various internal issues in the Borough involving the plaintiff; request for outstanding discovery from the Borough.	1.20 150.00/hr	180.00
9/19/2018 E-mail to plaintiff's counsel rescheduling plaintiff's deposition due to the assignment of new counsel representing the Borough and plaintiff's failure to confirm his availability for the deposition; request for dates to complete plaintiff's deposition.	0.10 150.00/hr	15.00
9/21/2018 Receipt and review of email from Ms. Bustamante requesting an updated status report pertaining to the case.	0.10 150.00/hr	15.00
9/23/2018 Receipt and review of email from Councilwoman Dabal transmitting an email chain regarding a political flyer; review the political flyer; telephone conference with Councilwoman Dabal to discuss the contents of the flyer and its impact upon the lawsuit.	0.60 150.00/hr	90.00
9/24/2018 E-mail to Ms. Bustamante providing a brief status regarding the status of discovery and the scheduled telephone conference with Judge Dickson.	0.10 150.00/hr	15.00
Review file documents in preparation for the telephone status conference with Judge Dickson.	0.40 150.00/hr	60.00
Attend telephone status conference with all counsel and Judge Dickson; discussion regarding discovery; request for entry of an order extending discovery and scheduling a telephone conference in January 2019.	0.50 150.00/hr	75.00
Receipt and review of email from the Court containing a minute entry for the status conference held before Judge Dickson.	0.10 150.00/hr	15.00

Ms. Jamie Bustamante

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	<u>Hrs/Rate</u>	<u>Amount</u>
9/24/2018 Receipt and review of email from the Court containing a text order extending fact discovery to January 31, 2019 and scheduling a telephone conference for January 8, 2019.	0.10 150.00/hr	15.00
9/25/2018 Exchange of emails with Ms. Smith regarding correspondence she transmitted to the Borough Administrator; the Borough's overdue responses and request for copies of the discovery demands.	0.10 150.00/hr	15.00
E-mail to Ms. Kelly transmitting the defendants' First Request for Production.	0.10 150.00/hr	15.00
Receipt and review of email from Councilman Olkowski transmitting a link to a newspaper article regarding the Borough Council's plans to discuss plaintiff's employment at an October meeting; review the article.	0.30 150.00/hr	45.00
10/2/2018 Telephone conference with Councilman Olkowski regarding the newspaper article, internal matters in the Borough involving the plaintiff and the manner in which those events may impact the lawsuit as possible claims of alleged retaliation.	0.70 150.00/hr	105.00
10/8/2018 Exchange of emails with Councilman Olkowski transmitting an email chain pertaining to issues with the plaintiff's preparation of meeting minutes and failure to properly perform his job as the Borough Clerk.	0.20 150.00/hr	30.00
Telephone conference with Councilman Olkowski regarding the email chain regarding plaintiff's failure to properly prepare meeting minutes; events transpiring within the Borough and establishing "progressive discipline" based upon plaintiff's repeated failures to properly perform his function as a Borough Clerk.	0.80 150.00/hr	120.00
10/10/2018 Telephone conference with Councilwoman Dabal regarding the submission of an invoice to the Borough purportedly from plaintiff's counsel; request for a copy of the invoice; receipt of an email transmitting the invoice, review the invoice prepared and submitted by counsel for the Borough.	0.40 150.00/hr	60.00
10/12/2018 Exchange of emails with Ms. Smith regarding the Borough's continued outstanding responses to the defendants' First Request for Production of IT documentation.	0.20 150.00/hr	30.00
10/18/2018 Telephone conference with the Borough Attorney regarding his status as a material witness and the inappropriateness of conducting an in-depth discussion with him regarding the plaintiff, his employment and the issues in this lawsuit.	0.60 150.00/hr	90.00
10/26/2018 E-mail to all counsel regarding the scheduling of plaintiff's deposition in accordance with the prior agreement among counsel.	0.10 150.00/hr	15.00
10/29/2018 Telephone conference with Councilman Rachelski regarding discovery and settlement.	0.50 150.00/hr	75.00

	<u>Hrs/Rate</u>	<u>Amount</u>
10/29/2018 Prepare HIPAA authorization for Summit Medical Group; email authorization to plaintiff's counsel with the request that plaintiff sign and return the authorization.	0.30 150.00/hr	45.00
10/30/2018 Telephone conference with Councilman Androwis regarding the status of the case, plaintiff's deposition, and events occurring within the Borough.	0.50 150.00/hr	75.00
Exchange of emails with plaintiff's counsel scheduling plaintiff's deposition.	0.20 150.00/hr	30.00
10/31/2018 Telephone conference with Councilman Olkowski regarding the status of the case, plaintiff's deposition, and events occurring within the Borough.	0.60 150.00/hr	90.00
Exchange of emails with plaintiff's counsel regarding the defendants' litigation control group and scheduling of depositions.	0.20 150.00/hr	30.00
Telephone conference with Timothy O'Connor, Esq., new counsel assigned to represent the Borough; discussion of the case, procedural status, plaintiff's deposition, defense strategy and issues involving the plaintiff internally in the Borough related to his employment.	1.20 150.00/hr	180.00
Receipt and review of email from Mr. O'Connor confirming his representation of the Borough.	0.10 150.00/hr	15.00
E-mail to Mr. O'Connor transmitting Mr. Tandy's request for the identities of members within the defendant Borough's litigation control group.	0.10 150.00/hr	15.00
Exchange of emails with all counsel regarding plaintiff's counsel's request for identities of persons within the defendant's litigation control group.	0.20 150.00/hr	30.00
E-mail to all clients confirming the scheduling of plaintiff's deposition.	0.10 150.00/hr	15.00
11/5/2018 Conduct partial review of file documents in preparation for plaintiff's deposition, including review of plaintiff's Bates stamped documents previously categorized for each cause of action; review plaintiff's certified interrogatory answers and response to the defendants' First Request for Production.	4.80 150.00/hr	720.00
11/6/2018 Continued review of file documents in preparation for plaintiff's deposition, including review of plaintiff's Bates stamped documents previously categorized for each cause of action; review plaintiff's certified interrogatory answers and response to the defendants' First Request for Production.	2.40 150.00/hr	360.00
11/7/2018 Finalize review of file documents in preparation for plaintiff's deposition, including review of plaintiff's Bates stamped documents previously categorized for each cause of action; review plaintiff's certified interrogatory answers and response to the defendants' First Request for Production; prepare outline for examination of plaintiff.	4.50 150.00/hr	675.00
E-mail to all counsel requesting confirmation of plaintiff's deposition scheduled for November 8, 2018.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
11/7/2018 Receipt and review of email from plaintiff's counsel confirming plaintiff's deposition.	0.10 150.00/hr	15.00
Receipt and review of email from plaintiff's counsel transmitting a five-page letter amending interrogatory answers and plaintiff's response to the defendants' document demands; allegations of continued retaliation by the Business Administrator against the plaintiff, potential HIPAA violations and privacy violations.	0.30 150.00/hr	45.00
Telephone conference with plaintiff's counsel regarding the letter amending interrogatory answers, the allegations of retaliation against plaintiff; plaintiff's intention to file an amended Complaint to include additional allegations of liability against the Borough and name Mr. Polce as a defendant in the lawsuit; agreement to adjourn plaintiff's deposition and request a telephone conference with the Court.	0.50 150.00/hr	75.00
Telephone conference with Mr. O'Connor regarding issues to be addressed during plaintiff's deposition; discussion of each cause of action, documents produced by plaintiff and proofs needed to establish the CEPA claim and First Amendment retaliation claim.	1.20 150.00/hr	180.00
Second telephone conference with Mr. O'Connor regarding Mr. Tandy's letter amending interrogatory answers asserting allegations of retaliation by Mr. Polce, agreement to adjourn plaintiff's deposition and obtain a telephone conference with the Court.	0.50 150.00/hr	75.00
Telephone conference with Councilman Rachelski regarding the potential for settlement, plaintiff's deposition and his recent absence from work while on medical leave.	0.70 150.00/hr	105.00
11/8/2018 E-mail to all clients regarding plaintiff's counsel's letter amending interrogatory answers which sets forth allegations of retaliation against Mr. Polce, plaintiff's intention to file an amended Complaint to name Mr. Polce as a defendant in the lawsuit; adjournment of the plaintiff's deposition and telephone conference with the Court.	0.40 150.00/hr	60.00
Receipt and review of email from Councilwoman Dabal transmitting an email chain regarding plaintiff's inability to work due to an alleged illness.	0.20 150.00/hr	30.00
Receipt and review of email from the Court transmitting a letter filed by plaintiff's counsel regarding the new allegations of liability and request for a telephone status conference with Judge Dickson.	0.20 150.00/hr	30.00
E-mail to all clients transmitting plaintiff's correspondence filed with the Court regarding the new allegations of liability against Mr. Polce and plaintiff's intention to file an amended Complaint; request for a telephone conference with the Court.	0.20 150.00/hr	30.00
11/12/2018 Receipt and review of email from plaintiff's counsel transmitting a letter amending interrogatory answers alleging an additional allegation of retaliation by Mr. Polce against the plaintiff concerning plaintiff's entitlement to remain in the Borough's polling places on Election Day.	0.20 150.00/hr	30.00

	<u>Hrs/Rate</u>	<u>Amount</u>
11/12/2018 E-mail to plaintiff's counsel requesting a copy of the November 5, 2018 email referenced in his letter alleging an additional act of retaliation by Mr. Polce concerning plaintiff's entitlement to remain in the Borough's polling places on Election Day.	0.10 150.00/hr	15.00
Receipt and review of email from plaintiff's counsel pertaining to the November 5, 2018 email from Mr. Polce to the Chief of Police concerning plaintiff's entitlement to remain in the Borough's polling places on Election Day.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal requesting information regarding Mr. Tandy's correspondence alleging additional acts of retaliation on the part of Mr. Polce concerning plaintiff's entitlement to remain in the Borough's polling places on Election Day.	0.10 150.00/hr	15.00
Receipt and review of email from Councilwoman Dabal transmitting the November 5, 2018 email from Mr. Polce to the Chief of Police concerning plaintiff's entitlement to remain in the Borough's polling places on Election Day.	0.10 150.00/hr	15.00
Telephone conference with Councilwoman Dabal regarding the events identified in Mr. Tandy's letter alleging new allegations of retaliation by Mr. Polce concerning plaintiff's entitlement to remain in the Borough's polling places on Election Day.	0.40 150.00/hr	60.00
Receipt and review of email from plaintiff's counsel transmitting the Bates stamped email document dated November 5, 2018 from Mr. Polce to the Chief of Police.	0.20 150.00/hr	30.00
Partial preparation of an update to the Litigation Loss Report involving the procedural status of the case and incorporation of information from plaintiff's interrogatory answers and the 1,136 Bates stamped documents provided as attachments to the plaintiff's written discovery responses.	2.30 150.00/hr	345.00
11/13/2018 Continued preparation and completion of the updated status report; email status report to Ms. Bustamante.	2.00 150.00/hr	300.00
For professional services rendered	100.20	\$15,030.00
Additional Charges :		
7/2/2018 Travel to US District Court, Newark, New Jersey for settlement conference.		26.40
Parking at US District Court, Newark, New Jersey, for settlement conference		16.00
Total costs		\$42.40
Total amount of this bill		\$15,072.40
Previous balance		\$13,718.00
8/3/2018 Payment - Thank You		(\$12,862.00)

Ms. Jamie Bustamante

8/15/2018 Write off bad debt

Total payments and adjustments

Balance due

Amount

(\$856.00)

(\$13,718.00)

\$15,072.40

Coinsurance Invoice (2)

Payment Due Date: 11/9/18

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

01-2030-20-1552-068

6621

Invoice Date:	10/9/18
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment <u>Due From Borough of Wallington</u>
\$10,000.00/\$20,000.00	\$8,542.95	<u>\$1,708.59</u> 20% coinsurance obligation

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Jamie Bustamante

#190412

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT



120 Gibraltar Road, Suite 210
Horsham, PA 19044

October 9, 2018

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057
Att: Victor Polce

Re:	Insured:	Borough of Wallington
	Claimant:	Baginski, Witold
	Policy No:	QJP0102601
	Claim No.:	QM-0708

Dear Mr. Polce,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's coinsurance obligation to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Jamie Bustamante at (215) 443-3540 or bustamante@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Jamie Bustamante

cc: Paul Barbire
South Bergen JIF Fund Attorney

Keenan & Doris

Attorneys at Law

71 Union Avenue, Suite 105, Rutherford, NJ 07070
[phone] 201-355-8110 [Fax] 201-355-8118

INVOICE

Date June 30, 2018
File No. 1005-47
Invoice No. 1725

Summit Risk Services
220 Gibraltar Road, Suite 100
Horsham, Pennsylvania
19044

Attention: Jamie Bustamante QM-0708

RE: Baginski v. Borough of Wallington

Professional services rendered from February 1, 2018 through June 30, 2018

SERVICES

Date		Description	Hrs
Feb-22-18	DMG	Telephone conference with claims specialist regarding legal strategy and Plaintiff's settlement demand	0.30
Feb-24-18	DMG	Comprehensive file review in preparation of drafting settlement position statement	1.40
Feb-26-18	BMP	Legal Research for use in Mediation Statement regarding CEPA claim elements	0.70
	BMP	Legal Research for use in Mediation Statement regarding NJ Civil Rights Act, Section 1983 claim elements	0.80
	BMP	Legal Research for use in Mediation Statement regarding NJ Civil Rights Act, Section 1983 claim elements	0.50
Feb-27-18	BMP	Preparation of draft Research Memo regarding Mediation Statement purposes	1.20
	DMG	Telephone conference with Co-Counsel in preparation of settlement conference	2.50
	DMG	Preparation of correspondence letter to the Court regarding claims adjuster appearance	0.20
Feb-28-18	BMP	Revision of Research Memo regarding Mediation Statement purposes (final form)	0.30
	DMG	Review and final revision of correspondence letter to the Court	0.10

	DMG	Preparation of settlement position statement	2.40
Mar-01-18	DMG	Revision of settlement position statement	1.00
	DMG	Correspondence from Court permitting claims specialist to appear telephonically for settlement conference	0.10
	DMG	Telephone conference with law clerk regarding filing settlement position statement with the Court	0.10
Mar-02-18	DMG	Email from claims adjuter confirming appearance for Monday's settlement conference	0.10
Mar-05-18	DMG	Comprehensive file review in preparation of settlement conference	1.30
	DMG	Attendance at court for settlement conference	4.50
	DMG	Correspondence from Court regarding next scheduled settlement conference	0.10
	DMG	Email to claims adjuster regarding next scheduled settlement conference	0.10
Mar-28-18	DMG	Review and analysis of correspondence from Counsel for individual defendants regarding Baginski's personnel file and job attendance at deposition of for Business Administrator position	0.20
	DMG	Telephone conference with Borough attorney regarding request for Baginski's personnel file	0.20
	DMG	Review and analysis of documents from Borough attorney and redaction of confidential information in response to Co-Defendants' request for documents	0.40
	DMG	Email to Counsel for individual defendants regarding Baginski's personnel file and job attendance at deposition of for Business Administrator position	0.20
Apr-25-18	DMG	Telephone conference with Co Counsel regarding settlement issues, discovery issues, and issues to be brought up with Judge Dixon in preparation of upcoming settlement conference	1.20
Apr-27-18	DMG	Telephone conference with claims specialsit in preparation of settlement conference	0.40
May-01-18	DMG	Telephone conference with Borough Administrator's office	0.10
	DMG	Telephone conference with Counsel for individual defendants regarding settlement position in preparation of settlement conference with Judge Dickson	0.30

May-02-18	DMG	Comprehensive file review in preparation of settlement conference	0.90
	DMG	Attendance 2nd settlement conference with Judge Dixon	5.10
	DMG	Review and analysis of Order from the Court regarding discovery production and next settlement conference	0.10
May-11-18	DMG	Telephone conference with Borough Administrator's office regarding discovery requests	0.10
May-17-18	DMG	Comprehensive file review in preparation of preparing Defendant's discovery responses	1.60
	DMG	Review and analysis of documents in preparation of Defendant's responses to Plaintiff's request for production of documents	1.20
	DMG	Email to Counsel for individual defendants regarding confidential status of Investigative Report	0.10
	DMG	Preparation of document request and interrogatory request to client	0.60
	DMG	Telephone conference with Borough Administrator regarding Defendant's responses to Plaintiff's discovery requests	0.20
	DMG	Preparation of Defendant's responses to Plaintiff's Request for the Production of Documents	1.80
	DMG	Preparation of Defendant's responses to Plaintiff's Interrogatories	2.40
	DMG	Email to Borough Administrator regarding request for documents and interrogatories	0.20
May-22-18	DMG	Email to Business Administrator regarding scheduling meeting	0.10
May-24-18	DMG	Telephone conference with Borough Administrator's office	0.10
Jun-04-18	DMG	Telephone conference with claims specialist regarding June settlement conference	0.10
Jun-06-18	DMG	Telephone conference with Victor Polce	0.20
Jun-07-18	DMG	Emails to and from Business Administrator regarding request for Plaintiff's personnel file	0.20
Jun-13-18	DMG	Emails from and to Plaintiff's Counsel regarding outstanding discovery	0.20
	DMG	Email from Plaintiff's Counsel regarding Plaintiff's discovery responses	0.10

June 30, 2018

Invoice #: 1725

Page 4

	DMG	Email from Counsel for Defendants regarding discovery responses	0.10
	DMG	Comprehensive file review in preparation of meeting with Business Administrator Victor Polce	0.70
	DMG	Meeting with client regarding the Borough's responses to Plaintiff's discovery requests and IT retention issues	2.50
	DMG	Receipt, review and analysis of documents for redaction, bates stamping, and production	2.70
	DMG	Preparation of Defendants' responses to Plaintiff's Request for Production of Documents	1.50
Jun-15-18	DMG	Telephone conference with Co Counsel regarding discovery strategy, case strategy, and upcoming settlement conference	0.80
	DMG	Email to Business Administrator regarding prior settlement discussions and Complaint	0.20
	DMG	Preparation of outstanding document requests and email to Business Administrator	0.40
	DMG	Telephone conference with claims specialist in preparation of settlement conference and Defendants' request for adjournment	0.30
	DMG	Preparation of Defendant's responses to Plaintiff's Interrogatories	0.80
	DMG	Email from claims adjuster regarding request for 90 day status update	0.10
	DMG	Comprehensive file review in preparation of 90 day revised states report	1.20
	DMG	Preparation of updated status report	0.70
Jun-18-18	DMG	Email to Business Administrator regarding draft of Interrogatories for review and certification	0.10
	DMG	Email to Business Administrator regarding review and certification of draft interrogatories	0.10
	DMG	Review and analysis of Court Order regarding settlement conference	0.20
	DMG	Email from Business Administrator regarding anti-harassment training	0.60
	DMG	Review and analysis of anti-harassment training documents in preparation of supplemental document production	0.20
	DMG	Revision of Defendant's responses to Plaintiff's Request for Production of Documents to include anti-harassment training documents	0.80

	DMG	Revision of Defendant's interrogatory responses to include anti-harassment training documents	0.30
Jun-19-18	DMG	Review and analysis of correspondence from Business Administrator regarding draft of write-up for Plaintiff	0.20
	DMG	Telephone conference with Business Administrator regarding discipline of Plaintiff	0.20
	DMG	Email to Business Administrator regarding executed Certification	0.10
	DMG	Telephone conference with Co Counsel regarding discovery issues	0.40
	DMG	Review and analysis of email correspondence from IT specialist regarding ESI discovery methods	0.30
	DMG	Email to IT specialist regarding ESI discovery regarding Plaintiff's email accounts	0.10
	DMG	Telephone conference with Co Counsel regarding discovery strategy	0.30
Jun-20-18	DMG	Review and analysis of email from co Counsel regarding discovery production strategy	0.20
	DMG	Email from It specialist regarding month end back tapes	0.10
	DMG	Email from Borough Administrator executed rog certification	0.10
	DMG	Receipt, review and analysis of correspondence from IT specialist regarding upgrade to GSUITE and turnaround time for IT retrieval	0.20
Jun-21-18	DMG	Emails to and from Co Counsel regarding Plaintiff's deficient discovery responses	0.20
Jun-22-18	DMG	Review and final revision of updated 90 status report	0.70
	DMG	Email to claims specialist regarding updated 90 day status report	0.10
Jun-26-18	DMG	Review and analysis of Order form Court regarding settlement conference	0.10
Jun-28-18	DMG	Emails from and to claims specialist regarding court ordered settlement conference	0.20
	DMG	Telephone conference with Co Counsel regarding settlement issues, discovery issues, in preparation of court ordered settlement conference	0.70

Jun-29-18	DMG	Preparation of correspondence to the Court requesting telephonic appearance for claims adjuster	0.20
	DMG	Telephone conference with claims specialist in preparation of settlement conference	0.40
	DMG	Email to claims specialist regarding prior settlement conferences, issues with settlement, and revised updated 90 day report	0.30
	DMG	Email from claims specialist regarding settlement authority in preparation of settlement conference	0.10
	DMG	Comprehensive file review in preparation of settlement conference	0.80
Jun-30-18	ICD	Receipt, review and analysis of New Appellate Division case discussing adverse employment action	0.60
Total professional services rendered			56.90

DISBURSEMENTS

Mar-22-18	Courier - New Jersey Lawyers Service	7.95
	Totals	7.95
	Total Fee & Disbursements	\$8,542.95
	Previous Balance	14,395.20
	Previous Payments	14,395.20
	Balance Now Due	\$8,542.95

PAYMENT DETAILS

May-15-18	Fees for Professional Services Apex Ck#03891			14,395.20
Fee Summary:				
Lawyer		Hours	Rate	Amount
Ian C. Doris		0.60	\$150.00	\$90.00
Bernadette M. Peslak		3.50	\$150.00	\$525.00
Debra McGarvey		52.80	\$150.00	\$7,920.00

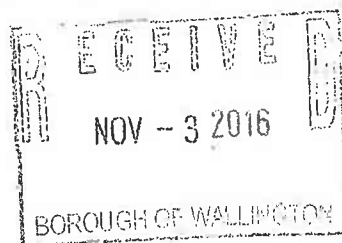
Clarke Caton Hintz

100 Barrack Street
Trenton, NJ 08608
Tel: 609 883 8383

INVOICE

Invoice Number: 66226
October 14, 2016

Wallington Borough, Bergen
Charles Cuccia, CFO
24 Union Blvd
Wallington, NJ 07057



Project: 5096 Wallington Borough - Court Appointed Special Master

For Professional Services Rendered Through 9/30/2016

00001 Determination of Mt. Laurel Compliance

P.O. #Docket # BER-L-6285-15

Professional Services

Planning	Labor Code	Date	Hours	Rate	Charge
McManus, Elizabeth K.	Prepare / Revise Correspondence	08/29/16	.30	190.00	\$57.00
Planning Total:			.30		\$57.00
					\$57.00
Total Invoice Amount					\$57.00

Aged Receivables

Current	31 - 60 Day	61-90 Day	91-120 Day	≥120 Days
\$57.00	\$0.00	\$0.00	\$0.00	\$0.00

All invoices are due within Thirty (30) days. A late charge will be added to any unpaid balance after 30 days.

Retention and Coinsurance Invoice (1)

Payment Due Date: 9/20/18

TO: Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057

01-2030-20-1552-068

6621

Invoice Date:	8/20/18
Claim Number:	QM-0708
Claimant:	Baginski, Witold
Policy #:	QJP0102601

Policy Retention/Coinsurance Amount	Invoice Amount Paid	Reimbursement Payment Due From Borough of Wallington
\$10,000.00/\$20,000.00	\$ 9,255.00 \$14,395.20 \$12,862.00	<u>\$15,302.44</u> <u>Above Amount Includes:</u> \$10,000.00 retention obligation \$ 5,302.44 due to date on the 20% coinsurance obligation

Please make check payable to: QBE Specialty Insurance Company

Send Payment To: Summit Risk Services, Inc.
120 Gibraltar Road, Suite 210
Horsham, PA 19044

Att: Jamie Bustamante

9/19/18

PLEASE INCLUDE THE CLAIM NUMBER ON ALL REMITTANCES TO ENSURE PROPER CREDIT



120 Gibraltar Road, Suite 210
Horsham, PA 19044

August 20, 2018

Borough of Wallington
24 Union Boulevard
Wallington, NJ 07057
Att: Victor Polce

Re:	Insured:	Borough of Wallington
	Claimant:	Baginski, Witold
	Policy No:	QJP0102601
	Claim No.:	QM-0708

Dear Mr. Polce,

Summit Risk Services is the Third Party Administrator on behalf of the QBE Specialty Insurance Company.

Enclosed please find for payment, QBE Specialty Insurance Company's invoice relative to the Insured's retention and coinsurance obligations to date.

Unless we hear back from you to the contrary, we will assume that the attached invoice will be paid by the Insured within 30 days.

Please be reminded that you can contact your JIF Claims Coordinator for details relative to a deferred deductible and copayment plan which has been adopted by your local JIF.

Please feel free to contact the assigned adjuster Jamie Bustamante at (215) 443-3540 or bustamante@summitrisk.com, should you have any questions.

We appreciate your prompt attention to this matter.

Sincerely,
Summit Risk Services,
Alice Ivers for Jamie Bustamante

cc: Paul Barbire
South Bergen JIF Fund Attorney

Scott K. Seelagy, Esq.

Attorney at Law
95 Spring Brook Road
Morristown, NJ 07960

Invoice submitted to:

Ms. Jamie Bustamante
Summit Risk Services, Inc.
2 Walnut Grove Dr., Suite 210
Horsham PA 19044
United States of America

June 21, 2018

In Reference To: Witold Baginski v. Borough of Wallington, et als
Case Number: 2:17-cv-05320-JLL-LAD
Your Claim #: QM-0708

Invoice #36

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
2/2/2018 Exchange of emails with Ms. Bustamante regarding the adjournment of the settlement conference.	0.20 160.00/hr	32.00
2/7/2018 Telephone conference with Councilwoman Dabal regarding plaintiff's demands that councilmembers submit OPRA requests prior to viewing public documents, labor counsel's position on the issue and the confidential report of labor counsel.	0.70 160.00/hr	112.00
2/8/2018 Receipt and review of multiple emails from Councilwoman Dabal transmitting a report prepared by labor counsel regarding plaintiff's mandate that councilmembers submit OPRA requests prior to viewing any public documents; review and highlight portions of the report.	0.50 160.00/hr	80.00
2/13/2018 Telephone conference with Councilwoman Dabal regarding plaintiff's demands that councilmembers submit OPRA requests prior to viewing public documents and discussion of labor counsel's confidential report addressing this issue; discussion of other events involving plaintiff within the Borough.	0.50 160.00/hr	80.00
2/22/2018 E-mail to Ms. Bustamante requesting that the law firm's billing invoice not be provided to the Borough of Wallington to avoid plaintiff viewing otherwise confidential and privileged information, including attorney/client communications.	0.20 160.00/hr	32.00
Receipt and review of email from Ms. Bustamante acknowledging the request not to provide billing invoice as to the Borough of Wallington to prevent plaintiff from viewing entries that contain confidential and privileged information.	0.10 160.00/hr	16.00
Second email to Ms. Bustamante indicating that plaintiff's access to the billing invoices would improperly provide him with confidential and privileged information damaging to defense strategy.	0.10 160.00/hr	16.00

973-726-0059

	<u>Hrs/Rate</u>	<u>Amount</u>
2/26/2018 Telephone conference with Councilman Rachelski regarding the lawsuit, the "big fish" email, information technology issues within the Borough, plaintiff's written discovery demands and Rule 26 Initial Disclosures; defense strategy and settlement.	1.40 160.00/hr	224.00
E-mail to Councilman Rachelski transmitting plaintiff's Rule 26 Initial Disclosures and attachments, plaintiff's document demand and demand for answers to Interrogatories.	0.30 160.00/hr	48.00
Receipt and review of email from Councilman Rachelski to confirm the domain which appears on his "sent" emails from the Borough's email system.	0.20 160.00/hr	32.00
Second telephone conference with Councilman Rachelski regarding the domain which appears on emails sent from the Borough's email system which appear markedly different from the domains and email addresses contained on the "big fish" email.	0.30 160.00/hr	48.00
2/27/2018 Telephone conference with Ms. McGarvey regarding the upcoming settlement conference and settlement options, proofs required for plaintiff to establish each count in the Complaint, potential for a motion if the matter fails to settle, actions taken by the Borough Council, matters involving the plaintiff and his employment at the Borough of Wallington, and defense strategy.	2.50 160.00/hr	400.00
2/28/2018 Telephone conference with plaintiff's counsel regarding plaintiff's settlement demands and discovery.	0.30 160.00/hr	48.00
Receipt and review of email from the Court transmitting correspondence filed by Ms. McGarvey regarding the adjuster's telephonic appearance at the settlement conference.	0.20 160.00/hr	32.00
3/1/2018 Telephone conference with Councilman Androwis regarding the allegations in the Complaint, the "big fish" email, plaintiff's written discovery demands, defense strategy and the settlement conference.	1.40 160.00/hr	224.00
Receipt and review of email from Councilman Androwis transmitting emails related to an incident involving plaintiff at the Civic Center involving the positioning of chairs and plaintiff's hostility toward councilmembers.	0.20 160.00/hr	32.00
Receipt and review of email from Councilman Androwis transmitting correspondence allegedly issued from the same address as the "big fish" email showing the email to be a fabrication.	0.30 160.00/hr	48.00
E-mail to all clients regarding the March 5, 2018 settlement conference.	0.20 160.00/hr	32.00
Receipt and review of email from Councilwoman Dabal regarding the settlement conference.	0.10 160.00/hr	16.00
Receipt and review of email from the Court authorizing defendants' insurance adjuster to appear by telephone at the settlement conference.	0.10 160.00/hr	16.00

	<u>Hrs/Rate</u>	<u>Amount</u>
3/2/2018 Prepare and email confidential settlement statement to the Court for Judge Dickson's consideration prior to the pending settlement conference.	5.20 160.00/hr	832.00
Telephone conference with Ms. Bustamante regarding settlement options, in preparation for the pending settlement conference scheduled for March 5, 2018.	0.60 160.00/hr	96.00
E-mail to Ms. Bustamante transmitting the confidential settlement statement for review.	0.20 160.00/hr	32.00
E-mail to all clients transmitting the confidential settlement statement for review.	0.20 160.00/hr	32.00
Receipt and review of email from Councilman Androwis transmitting his draft responses to the plaintiff's interrogatories to be utilized with the preparation of final draft answers.	0.40 160.00/hr	64.00
Receipt and review of email from Councilwoman Dabal regarding the confidential settlement statement.	0.10 160.00/hr	16.00
Receipt and review of email from Ms. Bustamante confirming her in-person appearance at the settlement conference.	0.10 160.00/hr	16.00
3/4/2018 Prepare for settlement conference before Judge Dickson, including review of the confidential settlement statement, specific ordinances and documents received from plaintiff with the Initial Disclosures; prepare outline addressing points to be raised at the conference.	1.30 160.00/hr	208.00
3/5/2018 Telephone conference with Councilwoman Dabal regarding the settlement conference, the options available to settle and additional events involving the plaintiff.	0.50 160.00/hr	80.00
Attend the settlement conference before Judge Dickson in U.S. District Court, Newark, New Jersey.	5.50 160.00/hr	880.00
3/6/2018 Telephone conference with plaintiff's counsel requesting that the Borough Council adjourn the pending hearing on the Rice Notice issued to the plaintiff related to OPRA and OPMA matters, the labor counsel's report provided to the governing body concerning those issues, and pending settlement discussions.	0.80 160.00/hr	128.00
Telephone conference with Councilwoman Dabal regarding plaintiff's counsel's request to adjourn the hearing on the Rice Notice issued to the plaintiff relating to OPRA and OPMA matters; plaintiff's counsel's possession of the labor counsel's confidential report provided to the Council addressing those issues, and settlement discussions.	0.50 160.00/hr	80.00
Second telephone conference with Councilwoman Dabal regarding the governing body's agreement to adjourn the hearing on the Rice Notice issued to the plaintiff involving OPRA and OPMA matters, agreement that the Council's decision to temporarily forgo the hearing would not constitute a waiver, and settlement discussions.	0.30 160.00/hr	48.00

	<u>Hrs/Rate</u>	<u>Amount</u>
3/6/2018 E-mail to plaintiff's counsel confirming the governing body's agreement to temporarily adjourn the hearing on the Rice Notice issued to the plaintiff concerning OPRA and OPMA matters, and confirming that the adjournment does not waiver of any rights of the governing body to proceed on the Rice Notice at a future date.	0.20 160.00/hr	32.00
Receipt and review of email from plaintiff's counsel regarding the adjournment of the hearing on the Rice Notice issued to the plaintiff and a reservation of all parties' rights.	0.10 160.00/hr	16.00
3/11/2018 Telephone conference with Councilwoman Dabal regarding the Borough's email and backup systems, the person in charge of information technology and the ability to obtain metadata from the system.	0.30 160.00/hr	48.00
Receipt and review of email from Councilwoman Dabal transmitting a draft DLGS confidential report regarding irregularities and shortages involving public funds related to water charges in the Borough.	0.40 160.00/hr	64.00
3/12/2018 Receipt and review of email from Councilwoman Dabal transmitting email documents regarding the municipal email retention system.	0.20 160.00/hr	32.00
Receipt and review of a second email from Councilwoman Dabal transmitting email documents regarding the municipal email retention system.	0.20 160.00/hr	32.00
Telephone conference with plaintiff's counsel regarding the schedule for exchanging written discovery responses.	0.20 160.00/hr	32.00
3/13/2018 Telephone conference with Councilwoman Dabal regarding a meeting with all clients, preparing discovery responses and the plaintiffs' various damage claims.	0.70 160.00/hr	112.00
Second telephone conference with Councilwoman Dabal regarding minutes of meetings and OPRA issues.	0.50 160.00/hr	80.00
Review an internal Borough report regarding the handling of OPRA issues involving the plaintiff.	0.60 160.00/hr	96.00
3/19/2018 Receipt and review of email from Councilwoman Dabal regarding the Borough's email system.	0.10 160.00/hr	16.00
Receipt and review of email from Councilwoman Dabal regarding Internal Borough matters.	0.30 160.00/hr	48.00
E-mail to Councilwoman Dabal requesting a telephone conference to discuss scheduling of a meeting, preparation of discovery responses and to discuss issues related to the lawsuit.	0.10 160.00/hr	16.00
Telephone conference with Councilwoman Dabal regarding preparation of discovery responses, a meeting with all clients to discuss issues related to the lawsuit, and the potential for settlement.	0.70 160.00/hr	112.00

	<u>Hrs/Rate</u>	<u>Amount</u>
3/19/2018 Second telephone conference with Councilwoman Dabal regarding Internal Borough matters and scheduling of a meeting to complete responses to the plaintiff's written discovery demands.	0.60 160.00/hr	96.00
3/26/2018 Receipt and review of email from Councilwoman Dabal transmitting OPRA requests submitted by Councilwoman Ivanicki to the plaintiff; complaint filed with the GRC and response letter to plaintiff from the GRC.	0.40 160.00/hr	64.00
Telephone conference with Councilwoman Dabal regarding plaintiff's non-compliance with outstanding OPRA requests; Councilwoman Ivanicki's filing of a complaint with the GRC and meeting to complete responses to the plaintiff's discovery demands.	0.50 160.00/hr	80.00
Review file documents in preparation for a meeting with the clients to complete responses to the plaintiff's written discovery demands; review plaintiff's Interrogatories and demand for production and documents provided by clients, prepare notes regarding issues to be discussed during meeting with the clients.	1.50 160.00/hr	240.00
3/27/2018 Attend meeting with the clients Rachelski, Dabal, Androws and Olkowski to discuss and prepare responses to the plaintiff's written discovery demands.	4.70 160.00/hr	752.00
E-mail to Ms. McGarvey requesting plaintiff's employment file and the Borough's advertisement for the Borough Administrator position after plaintiff was not reappointed to that position at the January 2, 2017 reorganization meeting.	0.10 160.00/hr	16.00
Exchange of emails with Councilwoman Dabal regarding OPRA requests submitted but not responded to by the plaintiff; and, submission of additional OPRA requests to obtain public documents.	0.30 160.00/hr	48.00
3/28/2018 Telephone conference with Councilwoman Dabal regarding plaintiff's failure to respond to OPRA requests and plaintiff's failure to provide the governing body with numerous minutes of meetings over an extended period of time; submission of an OPRA request to plaintiff to produce five years of minutes relating to caucus and regular meetings.	0.40 160.00/hr	64.00
E-mail to Councilwoman Dabal transmitting a draft OPRA request to the plaintiff seeking the minutes of caucus and regular meetings covering the past five years, to confirm his failure to timely and properly prepare meeting minutes.	0.30 160.00/hr	48.00
Exchange of emails with Councilman Dabal regarding submission of OPRA requests to the plaintiff regarding production of emails dating back more than 12 months to confirm plaintiff's involvement in the failure of the Borough to implement a required records retention system for public records.	0.30 160.00/hr	48.00
Receipt and review of email from Ms. McGarvey transmitting the Borough's January 2017 advertisement for the position of Borough Administrator, and production of plaintiff's employment file; review the advertisement and various correspondence prepared by the Borough Attorney regarding the BA position.	0.50 160.00/hr	80.00

	<u>Hrs/Rate</u>	<u>Amount</u>
4/5/2018 Receipt and review of email from Councilwoman Dabal attaching several documents involving complaints to the Mayor and Council, correspondence from ELEC, documents related to oaths and investigation reports.	0.70 160.00/hr	112.00
Telephone conference with Councilwoman Dabal regarding plaintiff's involvement in a dispute between a candidate for local office and the plaintiff, the filing of the complaint by the candidate against plaintiff and the ensuing investigation.	0.40 160.00/hr	64.00
E-mail to Councilwoman Dabal inquiring about the confidential nature of the labor counsel's report regarding OPRA legal requirements and plaintiff's mandate that councilmembers submit OPRA requests prior to viewing any public records contained in the Borough.	0.20 160.00/hr	32.00
4/16/2018 Review documentation obtained from clients to be included in defendants' response to the plaintiff's First Notice to Produce; organize and Bates stamp 207 pages of documents.	3.20 160.00/hr	512.00
Prepare Councilwoman Dabal's response to the plaintiff's First Notice to Produce, including review of extensive documentation to be identified in the response.	2.80 160.00/hr	448.00
4/17/2018 Prepare Councilman Olkowski's response to the plaintiff's First Notice to Produce, including review of documentation to be identified in the response.	1.40 160.00/hr	224.00
Prepare Councilman Rachelski's response to the plaintiff's First Notice to Produce, including review of documentation to be identified in the response.	1.40 160.00/hr	224.00
4/18/2018 Receipt and review of email from Councilman Olkowski transmitting email communications between plaintiff and councilmembers regarding a motion to employ best practices pertaining to the preparation of minutes to governing body members.	0.20 160.00/hr	32.00
Receipt and review of a second email from Councilman Olkowski regarding plaintiff's failure to timely and properly prepare minutes of meetings.	0.10 160.00/hr	16.00
Prepare Councilman Androwis's response to the plaintiff's First Notice to Produce, including review of documentation to be identified in the response.	1.40 160.00/hr	224.00
4/19/2018 Review and modify Councilwoman Dabal's response to the plaintiff's First Notice to Produce; email to Ms. Dabal transmitting the draft response for review and comment.	0.30 160.00/hr	48.00
Review and modify Councilman Olkowski's response to the plaintiff's First Notice to Produce; email to Mr. Olkowski transmitting the draft response for review and comment.	0.30 160.00/hr	48.00
Review and modify Councilman Androwis's response to the plaintiff's First Notice to Produce; email to Mr. Androwis transmitting the draft response for review and comment.	0.20 160.00/hr	32.00

	<u>Hrs/Rate</u>	<u>Amount</u>
4/19/2018 Review and modify Councilman Rachelski's response to the plaintiff's First Notice to Produce; email to Mr. Rachelski transmitting the draft response for review and comment.	0.20 160.00/hr	32.00
4/23/2018 E-mail to all clients requesting comment and/or approval the draft responses to the plaintiff's First Notice to Produce.	0.10 160.00/hr	16.00
4/24/2018 E-mail to Councilwoman Dabal requesting a telephone conference to discuss the response to plaintiff's First Notice to Produce and issues transpiring within the Borough.	0.10 160.00/hr	16.00
Receipt and review of email from Councilwoman Dabal transmitting emails exchanged between the new Borough Administrator and plaintiff, a Resolution appointing a permanent Deputy Clerk, a Tonnage Grant Application Resolution and a Service Agreement For a Certified Recycling Coordinator.	0.50 160.00/hr	80.00
Receipt and review of email from Councilwoman Dabal transmitting a letter from the State of New Jersey Department of Community Affairs to the plaintiff regarding a Denial of Access Complaint filed in the matter of Ivanicki vs. Borough of Wallington; review correspondence and attached documentation.	0.40 160.00/hr	64.00
Receipt and review of email from Councilwoman Dabal transmitting information regarding an incident within the Borough between the new Borough Administrator and the plaintiff regarding locked doors and an open environment.	0.20 160.00/hr	32.00
Receipt and review of six (6) additional emails from Councilwoman Dabal regarding various incidents occurring within the Borough Mr. Police (the new BA).	0.40 160.00/hr	64.00
Receipt and review of email from Councilwoman Dabal transmitting a Denial of Access Complaint filed by Dolores Rebecky regarding her OPRA request submitted to the plaintiff and correspondence from the NJ Department of community affairs to plaintiff concerning the Rebecky complaint.	0.30 160.00/hr	48.00
4/25/2018 Telephone conference with Ms. McGarvey regarding outstanding discovery, plaintiff's causes of action and defense strategy, and the settlement conference scheduled before Judge Dickson.	1.20 160.00/hr	192.00
4/26/2018 Telephone conference with Ms. Bustamante regarding the status of discovery, events transpiring within the Borough involving the plaintiff, plaintiff's failure to provide written discovery responses and the scheduled settlement conference before Judge Dickson.	1.00 160.00/hr	160.00
Telephone conference with Councilwoman Dabal regarding her review of the draft response to the plaintiff's First Notice to Produce, discussion of events in the Borough involving the plaintiff, the plaintiff's failure to provide written discovery responses and the effect on the upcoming settlement conference before Judge Dickson	0.80 160.00/hr	128.00

	<u>Hrs/Rate</u>	<u>Amount</u>
4/26/2018 Telephone conference with Joseph Hannon, Esq., (labor counsel) regarding events transpiring within the Borough involving plaintiff, the litigation, reservation of rights letters and the potential for settlement.	0.50 160.00/hr	80.00
Receipt and review of email from Councilwoman Dabal transmitting the DLGS confidential report and audit report regarding water charges and loss of revenue incurred by the Borough.	0.60 160.00/hr	96.00
Receipt and review of email from Councilman Rachelski regarding plaintiff transmitting copies of emails to his attorney in an effort to intimidate governing body members.	0.60 160.00/hr	96.00
Receipt and review of email from Councilwoman Dabal regarding shared services for the Borough Clerk position as permitted by the State of New Jersey.	0.20 160.00/hr	32.00
Receipt and review of email from Mr. Hannon regarding shared services for the position of Borough Clerk.	0.10 160.00/hr	16.00
Receipt and review of email from Councilwoman Dabal regarding communications with other municipalities regarding the potential for a shared service agreement for the Borough Clerk position.	0.10 160.00/hr	16.00
Exchange of emails with Mr. Hannon regarding the issuance of a reservation of rights letter to the clients.	0.20 160.00/hr	32.00
4/27/2018 Exchange of emails with Mr. Hannon regarding assignment of the defense and issuance of a reservation of rights letter.	0.20 160.00/hr	32.00
E-mail to Mr. Hannon confirming that this law firm never received a reservation of rights letter for any of the clients.	0.10 160.00/hr	16.00
Exchange of emails with Ms. McGarvey regarding contact information for the Mr. Victor Polce, the new Business Administrator.	0.20 160.00/hr	32.00
4/30/2018 E-mail to Mr. Hannon regarding contact information for the adjuster handling the claim.	0.10 160.00/hr	16.00
E-mail to Mr. McGarvey regarding plaintiff's failure to provide discovery responses prior to the scheduled settlement conference.	0.10 160.00/hr	16.00
5/1/2018 E-mail to Councilwoman Dabal transmitting a modified response to the plaintiff's First Notice to Produce, and additional emails transmitting copies of all Bates stamped attachments.	0.40 160.00/hr	64.00
E-mail to Councilman Olkowski transmitting a modified response to the plaintiff's First Notice to Produce, and additional emails transmitting copies of all Bates stamped attachments.	0.20 160.00/hr	32.00
E-mail to Councilman Rachelski transmitting a modified response to the plaintiff's First Notice to Produce, and additional emails transmitting copies of all Bates stamped attachments.	0.20 160.00/hr	32.00

	<u>Hrs/Rate</u>	<u>Amount</u>
5/1/2018 E-mail to Councilman Androwis transmitting a modified response to the plaintiff's First Notice to Produce, and additional emails transmitting copies of all Bates stamped attachments.	0.20 160.00/hr	32.00
5/2/2018 Review file documents in preparation for settlement conference.	0.40 160.00/hr	64.00
Attend settlement conference before Judge Dickson in US District Court, Newark, New Jersey.	5.40 160.00/hr	864.00
Receipt and review of email from the Court scheduling a third settlement conference on June 21, 2018.	0.10 160.00/hr	16.00
E-mail to all clients regarding the scheduling of the third settlement conference before Judge Dickson in the US District Court, Newark, New Jersey.	0.10 160.00/hr	16.00
Receipt and review of email from Mr. Androwis confirming his approval of the response to the plaintiff's First Notice to Produce.	0.10 160.00/hr	16.00
Receipt and review of email from the Court regarding an entry regarding the settlement conference held before Judge Dickson.	0.10 160.00/hr	16.00
5/3/2018 Telephone conference with Councilman Olkowski regarding the events that occurred during the settlement conference before Judge Dickson.	0.50 160.00/hr	80.00
Telephone conference with Councilman Androwis regarding the events that occurred during the settlement conference before Judge Dickson.	0.40 160.00/hr	64.00
5/10/2018 Telephone conference with Councilman Olkowski regarding events involving plaintiff failing to satisfy numerous outstanding OPRA requests and related issues regarding plaintiff's job performance.	0.40 160.00/hr	64.00
5/15/2018 Telephone conference with Councilwoman Dabal regarding settlement and the effects thereof, the lack of evidence supporting the allegations in the Complaint, plaintiff's failure to respond to additional OPRA requests and overall poor job performance.	0.60 160.00/hr	96.00
5/17/2018 Telephone conference with Councilman Olkowski regarding events involving potential settlement, plaintiff's continued failure to respond to OPRA requests and other events involving plaintiff's conduct.	0.40 160.00/hr	64.00
Receipt and review of email from Ms. McGarvey transmitting the NJ State Comptroller's Report addressing overtime abuse by plaintiff in his former position as the Business Administrator, questions regarding confidentiality.	0.20 160.00/hr	32.00
E-mail to Ms. McGarvey confirming the public nature of the NJ State Comptroller's report regarding plaintiff's abusive overtime pay in his former position as the Business Administrator, plaintiff's termination from his position as the BA and discovery issues.	0.30 160.00/hr	48.00
5/18/2018 Exchange of emails with Ms. McGarvey regarding defendants' discovery responses to plaintiff's written discovery demands.	0.20 160.00/hr	32.00

	<u>Hrs/Rate</u>	<u>Amount</u>
6/7/2018 Receipt and review of email from Ms. Bustamante regarding an updated status report.	0.10 160.00/hr	16.00
E-mail to Ms. Bustamante regarding ongoing issues at the Borough involving the plaintiff, submission of an updated status report.	0.10 160.00/hr	16.00
6/12/2018 Prepare draft answers to plaintiff's First Set of Interrogatories on behalf of Councilwoman Dabal; review documentation produced by client in connection with drafting answers.	3.20 160.00/hr	512.00
Prepare draft answers to plaintiff's First Set of Interrogatories on behalf of Councilman Olkowski; review documentation produced by client in connection with drafting answers.	1.50 160.00/hr	240.00
6/13/2018 Receipt and review of email from plaintiff's counsel requesting a mutually agreed-upon day to serve written discovery responses.	0.10 160.00/hr	16.00
Receipt and review of email from Ms. McGarvey responding to plaintiff's email concerning service of written discovery responses and the scheduled date for the next settlement conference.	0.10 160.00/hr	16.00
Receipt and review of email from plaintiff's counsel regarding outstanding discovery and the upcoming settlement conference.	0.10 160.00/hr	16.00
E-mail to all counsel regarding service of written discovery responses.	0.10 160.00/hr	16.00
6/14/2018 Telephone conference with Ms. McGarvey regarding adjournment of the settlement conference due to the ongoing investigation involving the Bergen County Prosecutor's Office, discussion regarding the litigation, discovery and plaintiff's damages.	0.50 160.00/hr	80.00
Prepare draft answers to plaintiff's First Set of Interrogatories on behalf of Councilman Rachelski; review documentation produced by client in connection with drafting answers.	1.50 160.00/hr	240.00
Prepare draft answers to plaintiff's First Set of Interrogatories on behalf of Councilman Andrewis; review documentation produced by client in connection with drafting answers.	1.50 160.00/hr	240.00
6/15/2018 Telephone conference with Councilwoman Dabal regarding the next settlement conference, events transpiring within the Borough involving plaintiff, ongoing investigation by the Bergen County Prosecutor.	0.80 160.00/hr	128.00
6/16/2018 E-mail to Councilwoman Dabal transmitting draft answers to plaintiff's First Set of Interrogatories for review and approval, request for modifications if necessary and execution of attached certification provided answers are acceptable.	0.20 160.00/hr	32.00

	<u>Hrs/Rate</u>	<u>Amount</u>
6/16/2018 E-mail to Councilman Rachelski transmitting draft answers to plaintiff's First Set of Interrogatories for review and approval, request for modifications if necessary and execution of attached certification provided answers are acceptable.	0.20 160.00/hr	32.00
E-mail to Councilman Androwis transmitting draft answers to plaintiff's First Set of Interrogatories for review and approval, request for modifications if necessary and execution of attached certification provided answers are acceptable.	0.20 160.00/hr	32.00
E-mail to Councilman Olkowski transmitting draft answers to plaintiff's First Set of Interrogatories for review and approval, request for modifications if necessary and execution of attached certification provided answers are acceptable.	0.20 160.00/hr	32.00
6/17/2018 Receipt and review of email from Councilwoman Dabal approving of the draft Interrogatory answers; inclusion of information regarding a past grievance involving plaintiff concerning political retaliation.	0.10 160.00/hr	16.00
Receipt and review of Councilman Olkowski approving of the draft interrogatory answers; receipt of the executed certification.	0.20 160.00/hr	32.00
6/18/2018 Telephone conference with Councilman Olkowski regarding answers to Interrogatories and response to the plaintiff's demand for the production of documents; issues to be discussed during the next settlement conference.	0.40 160.00/hr	64.00
E-mail to Councilwoman Dabal regarding the interrogatory answers and documents to be produced to the plaintiff; written discovery demands served upon plaintiff and the status of the investigation being conducted by the Bergen County Prosecutor's Office.	0.30 160.00/hr	48.00
E-mail to Councilwoman Dabal requesting return of the executed certification for the interrogatory answers.	0.10 160.00/hr	16.00
Receipt and review of email from the Court rescheduling the settlement conference to July 2, 2018 before Judge Dickson in the U.S. District Court, Newark, New Jersey.	0.10 160.00/hr	16.00
E-mail to the clients advising of the Court's adjournment of the settlement conference to July 2, 2018 before Judge Dickson.	0.10 160.00/hr	16.00
E-mail to Ms. Bustamante advising of the Court's adjournment of the settlement conference to July 2, 2018 before Judge Dickson.	0.10 160.00/hr	16.00
Receipt and review of email from Ms. Bustamante acknowledging the adjournment of the settlement conference; telephone conference to discuss settlement.	0.10 160.00/hr	16.00
Second e-mail to Ms. Bustamante regarding a telephone conference to discuss settlement and the status of the case.	0.10 160.00/hr	16.00

Ms. Jamie Bustamante

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	<u>Hrs/Rate</u>	<u>Amount</u>
6/18/2018 Additional email to Ms. Bustamante regarding the updated status report.	0.10 160.00/hr	16.00
6/19/2018 Telephone conference with Ms. McGarvey regarding the rescheduled settlement conference, documentation to be produced by discovery, date for service of discovery responses, settlement and the merits of plaintiff's case.	0.80 160.00/hr	128.00
E-mail to Councilman Rachelski requesting review of the Interrogatory answers and return of the executed certification page provided the answers are acceptable.	0.10 160.00/hr	16.00
E-mail to Councilman Androwis requesting review of the Interrogatory answers and return of the executed certification page provided the answers are acceptable.	0.10 160.00/hr	16.00
E-mail to Councilwoman Dabal requesting review of the Interrogatory answers and return of the executed certification page provided the answers are acceptable.	0.10 160.00/hr	16.00
Prepare update status report; email report to Ms. Bustamante.	1.00 160.00/hr	160.00
Receipt and review of email from Councilman Androwis regarding his review of the interrogatory answers.	0.10 160.00/hr	16.00
Receipt and review of email from Councilman Rachelski transmitting the executed certification page to be appended to his interrogatory answers.	0.10 160.00/hr	16.00
Receipt and review of email from Councilwoman Dabal inquiring whether plaintiff's counsel requested the adjournment of the settlement conference.	0.10 160.00/hr	16.00
6/20/2018 Receipt and review of email from Councilman Androwis approving of the interrogatory answers.	0.10 160.00/hr	16.00
E-mail to Councilman Androwis regarding his approval of the Interrogatory answers, his response to the plaintiff's request for the production of documents and a request for the return of the executed certification to be attached to the interrogatory answers.	0.10 160.00/hr	16.00
E-mail to Councilwoman Dabal responding to her inquiry concerning the reason for the adjournment of the settlement conference.	0.10 160.00/hr	16.00
E-mail to Councilwoman Dabal requesting the return of the signed certification page.	0.10 160.00/hr	16.00
For professional services rendered	85.60	\$13,696.00

\$ 12,840

Ms. Jamie Bustamante

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Additional Charges :

	<u>Amount</u>
3/5/2018 Parking at US District Court, Newark, New Jersey - settlement conference before Judge Dickson	11.00
5/2/2018 Parking at US District Court, Newark, New Jersey - settlement conference before Judge Dickson	11.00
Total costs	<u>\$22.00</u>
Total amount of this bill	\$13,718.00
Previous balance	\$9,255.00
4/23/2018 Payment - Thank You	<u>(\$9,255.00)</u>
Total payments and adjustments	<u>(\$9,255.00)</u>
Balance due	<u><u>\$13,718.00</u></u>

\$12,862.00

Scott K. Seelagy, Esq.

Attorney at Law
95 Spring Brook Road
Morristown, NJ 07960

Invoice submitted to:

Ms. Jamie Bustamante
Summit Risk Services, Inc.
2 Walnut Grove Dr., Suite 210
Horsham PA 19044
United States of America

February 22, 2018

In Reference To: Witold Baginski v. Borough of Wallington, et als
Case Number: 2:17-cv-05320-JLL-LAD
Your Claim #: QM-0708

Invoice #31

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
11/13/2017 Telephone conference with Ms. Bustamante confirming the assignment to defend the individual councilmembers; discussion of the allegations in the Complaint.	0.30 150.00/hr	45.00
Telephone conference with Debra McGarvey, Esq., counsel for the Borough of Wallington regarding the procedural status of the case, representation of the parties in the allegations in the Complaint.	0.40 150.00/hr	60.00
Receipt and review of email from Ms. McGarvey transmitting the Answer filed with the Court on behalf of all defendants.	0.20 150.00/hr	30.00
E-mail to Ms. McGarvey confirming receipt of the pleadings, in preparation and filing of a Substitution of Attorney for the individual councilperson defendants.	0.10 150.00/hr	15.00
E-mail to Ms. Bustamante confirming acceptance of the assignment to defend the individual councilperson defendants, filing of a Substitution of Attorney and the scheduled Rule 16 hearing before Judge Dickson in the U.S. District Court.	0.20 150.00/hr	30.00
Receipt and review of email from Ms. McGarvey transmitting a draft of the Joint Discovery Plan to be submitted to the Court by all parties.	0.30 150.00/hr	45.00
11/14/2017 Receipt and review of email from Ms. Bustamante transmitting new assignment, including the Complaint, Litigation Loss Report and Initial the Budget Report.	0.40 150.00/hr	60.00
E-mail to Ms. McGarvey confirming consent to file the Joint Discovery Plan; request for a Discovery Confidentiality Order.	0.20 150.00/hr	30.00
Prepare and email a Substitution of Attorney to Ms. McGarvey for review and signature.	0.30 150.00/hr	45.00

973-726-0059

	<u>Hrs/Rate</u>	<u>Amount</u>
11/14/2017 Receipt and review of email from Ms. McGarvey regarding the need for a Discovery Confidentiality Order.	0.10 150.00/hr	15.00
Receipt and review of a second email from Ms. McGarvey consenting to the filing of the Substitution of Attorney with the Court as to the individual councilperson defendants.	0.10 150.00/hr	15.00
Exchange of additional emails with Ms. McGarvey regarding the need for a Discovery Confidentiality Order to protect against the potential disclosure of confidential documentation during discovery, in light of certain allegations in the Complaint.	0.20 150.00/hr	30.00
E-mail to Ms. McGarvey requesting documentation obtained from the individual councilperson defendants prior to the re-assignment of legal representation; request for the individual councilperson defendants' contact information.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey transmitting contact information for the individual councilperson defendants.	0.10 150.00/hr	15.00
E-file the executed Substitution of Attorney with the Court.	0.20 150.00/hr	30.00
Receipt and review of email from the Court transmitting the filed Substitution of Attorney.	0.20 150.00/hr	30.00
Receipt and review of additional emails from Ms. McGarvey transmitting multiple newspaper articles and minutes of the January 2, 2017 reorganization meeting of the Borough Council; review and highlight portions of those documents for future reference.	0.40 150.00/hr	60.00
Telephone conference with Councilman Rachelski confirming the assignment of legal representation; discussion regarding plaintiff's history and involvement as an employee of the Borough; specific incidents involving the plaintiff; and the allegations in the Complaint.	0.80 150.00/hr	120.00
11/15/2017 E-mail to Khaldoun Androwis confirming legal representation and request for telephone conference to discuss the case.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey to all counsel transmitting a modified version of the Joint Discovery Plan, and request for consent to file a proposed Discovery Confidentiality Order with the Court; review the final version of the JDP; email to Ms. McGarvey giving consent to file the JDP and to utilize the standard form of Discovery Confidentiality Order.	0.30 150.00/hr	45.00
11/16/2017 Receipt and review of email from the Court transmitting a Joint Discovery Plan filed by plaintiff's counsel with the consent of all parties.	0.30 150.00/hr	45.00
11/17/2017 Telephone conference with Ms. McGarvey regarding the allegations in the Complaint, communications with the individual councilperson defendants and the initial Rule 16 conference.	0.30 150.00/hr	45.00

	<u>Hrs/Rate</u>	<u>Amount</u>
11/17/2017 Telephone call to Councilwoman Dabal regarding plaintiff's lawsuit.	0.10 150.00/hr	15.00
Telephone call to Councilman Olkowski regarding plaintiff's lawsuit.	0.10 150.00/hr	15.00
11/20/2017 E-mail to Councilwoman Dabal confirming legal representation and requesting a telephone conference to discuss the case.	0.10 150.00/hr	15.00
E-mail to Councilman Olkowski confirming legal representation and requesting a telephone conference to discuss the case.	0.10 150.00/hr	15.00
E-mail to Councilman Androwis confirming legal representation and requesting a telephone conference to discuss the case.	0.10 150.00/hr	15.00
11/29/2017 Review the pleadings, documentation received from Ms. McGarvey, and the filed Joint Discovery Plan in preparation for the initial Rule 16 conference before Judge Dickson.	0.50 150.00/hr	75.00
Telephone conference with Councilman Androwis regarding plaintiff's lawsuit; specific allegations made against the individual defendants, the need for separate counsel and plaintiff's employment situation with the Borough.	0.50 150.00/hr	75.00
11/30/2017 Attend the Rule 16 initial conference before Judge Dickson in the U.S. District Court, Newark, New Jersey.	2.80 150.00/hr	420.00
Receipt and review of email from the Court transmitting an entry on the docket pertaining to the Rule 16 initial conference held before Judge Dickson.	0.10 150.00/hr	15.00
Receipt and review of a second email from the Court transmitting the filed, Final Pre-Trial Scheduling Order sign by Judge Dickson setting forth dates for the completion of discovery and amendments to the pleadings.	0.30 150.00/hr	45.00
12/2/2017 Receipt and review of email from Ms. McGarvey transmitting the minutes of the meeting dated May 23, 2002 granting plaintiff a gas allowance; highlight portions of the minutes for future reference.	0.30 150.00/hr	45.00
12/5/2017 Receipt and review of email from Ms. McGarvey transmitting a proposed Discovery Confidentiality Order to be filed with the Court.	0.30 150.00/hr	45.00
E-mail to Ms. McGarvey regarding the minutes of the May 23, 2012 meeting and the proposed Discovery Confidentiality Order.	0.10 150.00/hr	15.00
E-mail to Ms. McGarvey consenting to the form and filing of the Discovery Confidentiality Order.	0.20 150.00/hr	30.00
E-mail to Ms. Bustamante providing a brief status report concerning the initial conference before Judge Dickson and the terms of the Pre-Trial Scheduling Order.	0.30 150.00/hr	45.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/6/2017 Receipt and review of email from Ms. McGarvey to plaintiff's counsel requesting a release to obtain plaintiff's personal file from the Borough of Wallington.	0.10 150.00/hr	15.00
Receipt and review of email from the Court transmitting a letter from Ms. McGarvey to the Court and the proposed Discovery Confidentiality Order.	0.20 150.00/hr	30.00
12/8/2017 Receipt and review of email from the Court transmitting the Discovery Confidentiality Order executed by Judge Dickson.	0.20 150.00/hr	30.00
12/11/2017 E-mail to Ms. McGarvey requesting copies of resolutions previously obtained from the Borough of Wallington.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey transmitting multiple resolutions passed by the Borough Council relating to the issues in the case, and the Wallington Employee Manuals for 2014 and 2016.	0.20 150.00/hr	30.00
12/13/2017 Review and highlight portions of the resolutions received from Ms. McGarvey relating to various allegations contained in the Complaint.	0.70 150.00/hr	105.00
Review and highlight portions of the 2014 Wallington Employee Manual.	0.70 150.00/hr	105.00
Review and highlight portions of the 2016 Wallington Employee Manual.	0.40 150.00/hr	60.00
12/14/2017 Prepare Rule 26 Initial Disclosures on behalf of the clients; compile, organize and Bates stamped the attachments to the initial disclosures to include multiple resolutions, newspaper articles, and the Borough's employee manuals.	2.00 150.00/hr	300.00
E-mail to Ms. McGarvey regarding the Rule 26 Initial Disclosures.	0.10 150.00/hr	15.00
Telephone conference with Ms. McGarvey regarding the Rule 26 Initial Disclosures to be served by the defendants upon plaintiff.	0.40 150.00/hr	60.00
Prepare a Certification of Service; email all counsel the clients' Rule 26 Initial Disclosures with attachments.	0.30 150.00/hr	45.00
Receipt and review of email transmitting the Borough of Wallington's Rule 26 Initial Disclosures with Bates stamped attachments that include resolutions, ordinances and the 2014 and 2016 employee manuals.	0.70 150.00/hr	105.00
12/15/2017 Receipt and review of email from plaintiff's counsel transmitting Rule 26 initial disclosures without attachments, and an indication that plaintiff will provide the attachments shortly.	0.50 150.00/hr	75.00
12/19/2017 E-mail to Councilman Androwis requesting a telephone conference to discuss the allegations in the Complaint, emails identified in the pleading and defense strategy.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/19/2017 E-mail to Councilwoman Dabal requesting a telephone conference to discuss the allegations in the Complaint, emails identified in the pleading and defense strategy.	0.10 150.00/hr	15.00
E-mail to Councilman Olkowski requesting a telephone conference to discuss the allegations in the Complaint, emails identified in the pleading and defense strategy.	0.10 150.00/hr	15.00
E-mail to Councilman Rachelski requesting a telephone conference to discuss the allegations in the Complaint, emails identified in the pleading and defense strategy.	0.10 150.00/hr	15.00
E-mail to plaintiff's counsel regarding discovery items.	0.10 150.00/hr	15.00
Telephone conference with plaintiff's counsel regarding consent to serve a single set of Interrogatories containing the allotment of 25 questions per client; and, consent to serve a single demand to produce containing a maximum of 25 requests per client; request for plaintiff to produce the attachments that did not accompany the Rule 26 Initial Disclosures.	0.40 150.00/hr	60.00
Prepare Interrogatories to the plaintiff consisting of 96 total questions as permitted by the Court's scheduling order.	3.50 150.00/hr	525.00
12/20/2017 Prepare Request for Production to the plaintiff consisting of 65 separate requests for documents and tangible things as permitted by the Court's Scheduling Order.	3.00 150.00/hr	450.00
12/21/2017 E-mail to Ms. McGarvey requesting a telephone conference to discuss service of written discovery demands upon the Borough of Wallington, including but not limited to metadata regarding emails identified in the Complaint.	0.20 150.00/hr	30.00
Review and finalize Interrogatories to the plaintiff; letter to plaintiff's counsel transmitting the clients written discovery demands.	0.20 150.00/hr	30.00
Email to plaintiff's counsel and counsel for the Borough of Wallington transmitting the clients' written discovery demands.	0.10 150.00/hr	15.00
Receipt and review of email from Ms. McGarvey transmitting the Borough of Wallington's interrogatories and Request to Produce Documents directed to the plaintiff; review the interrogatories and document demand.	0.60 150.00/hr	90.00
Receipt and review of email from plaintiff's counsel confirming that plaintiff will be serving written discovery demands beyond the deadline in the Court's Scheduling Order.	0.10 150.00/hr	15.00
12/22/2017 Telephone conference with Ms. McGarvey regarding production of emails identified in the Complaint; service of a document demand upon the Borough to produce relevant emails, metadata and other items.	0.30 150.00/hr	45.00

	<u>Hrs/Rate</u>	<u>Amount</u>
12/22/2017 Prepare a Request for Production directed to the Borough of Wallington; letter to Ms. McGarvey transmitting discovery demands; email to Ms. McGarvey and plaintiff's counsel.	1.20 150.00/hr	180.00
Prepare and email fee budget report to Ms. Bustamante.	1.50 150.00/hr	225.00
1/2/2018 E-mail to plaintiff's counsel requesting documents that were never provided with plaintiff's Rule 26 Initial Disclosures, and inquiring whether plaintiff intended to propound written discovery demands as no demands were received despite a service deadline of December 21, 2017.	0.20 150.00/hr	30.00
Receipt and review of email from plaintiff's counsel advising that the requested documentation for the Rule 26 Initial Disclosures and written discovery demands would be provided shortly.	0.10 150.00/hr	15.00
1/9/2018 Receipt of email from plaintiff's counsel transmitting Interrogatories and Notice to Produce Documents to defendants Rachelski, Dabal, Androwis and Olkowski, and documents Bates stamped 1-254 constituting attachments to plaintiff's Rule 26 Initial Disclosures; review the Interrogatories and Notice to Produce Documents directed to the clients.	0.70 150.00/hr	105.00
E-mail to plaintiff's counsel confirming receipt of plaintiff's written discovery demands and modification of the due for service of responsive answers from the clients.	0.10 150.00/hr	15.00
Exchange of additional emails with plaintiff's counsel regarding dates for service of responses to the parties' written discovery demands.	0.20 150.00/hr	30.00
1/10/2018 E-mail to Councilwoman Dabal requesting a telephone conference to discuss the lawsuit.	0.10 150.00/hr	15.00
E-mail to Councilman Rachelski requesting a telephone conference to discuss the lawsuit.	0.10 150.00/hr	15.00
E-mail to Councilman Androwis requesting a telephone conference to discuss the lawsuit.	0.10 150.00/hr	15.00
E-mail to Councilman Olkowski requesting a telephone conference to discuss the lawsuit.	0.10 150.00/hr	15.00
E-mail to Councilman Rachelski transmitting plaintiff's Interrogatories and Notice to Produce directed to the clients, and further enclosing Bates stamped documents 1-254 constituting attachments to plaintiff's Rule 26 Initial Disclosures; instructions for responding to plaintiff's discovery demands.	0.40 150.00/hr	60.00
E-mail to Councilman Androwis transmitting plaintiff's Interrogatories and Notice to Produce directed to the clients, and further enclosing Bates stamped documents 1-254 constituting attachments to plaintiff's Rule 26 Initial Disclosures; instructions for responding to plaintiff's discovery demands.	0.20 150.00/hr	30.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/10/2018 E-mail to Councilman Olkowski transmitting plaintiff's Interrogatories and Notice to Produce directed to the clients, and further enclosing Bates stamped documents 1-254 constituting attachments to plaintiff's Rule 26 Initial Disclosures; instructions for responding to plaintiff's discovery demands.	0.20 150.00/hr	30.00
E-mail to Councilwoman Dabal transmitting plaintiff's Interrogatories and Notice to Produce directed to the clients, and further enclosing Bates stamped documents 1-254 constituting attachments to plaintiff's Rule 26 Initial Disclosures; instructions for responding to plaintiff's discovery demands.	0.20 150.00/hr	30.00
Exchange of emails with Councilwoman Dabal confirming a telephone conference to discuss plaintiff's lawsuit.	0.20 150.00/hr	30.00
Telephone conference with Councilwoman Dabal regarding plaintiff's lawsuit, including the factual allegations section of the Complaint, each cause of action, plaintiff's employment in the Borough, related investigations performed by the State Comptroller and the Prosecutor's office, and discovery issues.	1.50 150.00/hr	225.00
Receipt and review of email from Councilwoman Dabal authorizing Ms. McGarvey to provide this office with documentation previously given to her prior to the change of legal representation.	0.10 150.00/hr	15.00
E-mail to Ms. McGarvey transmitting the executed authorization from Councilwoman Dabal with a request to produce documents provided by the client prior to the change of legal representation.	0.10 150.00/hr	15.00
Receipt and review of email from Councilwoman Dabal transmitting a link to the NJ State Comptroller investigative report pertaining to the Borough of Wallington regarding abuse of overtime pay.	0.10 150.00/hr	15.00
Receipt and review of email from Councilwoman Dabal regarding the March 27, 2017 caucus session and the events involving her concern about the accuracy of the meeting minutes.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal confirming that her executed authorization was provided to Ms. McGarvey with a request for the production of documentation; a request for a copy of the April 19, 2017 email and plaintiff's responsive email dated April 20, 2017; confirmation of the date for an initial settlement conference before Judge Dickson.	0.20 150.00/hr	30.00
Receipt and review of email from Ms. McGarvey transmitting a newspaper article involving a rental agreement between a contractor and the Borough pertaining to a Superfund site within the municipality; review the article.	0.40 150.00/hr	60.00
Receipt of email from Ms. McGarvey transmitting the January 2, 2017 minutes of the re-organization meeting of the Borough Council; review the meeting minutes and highlight portions for future reference.	0.30 150.00/hr	45.00
Receipt and review of an email chain between Ms. McGarvey and Councilwoman Dabal addressing the allegations in the Complaint, plaintiff's failure to be re-appointed as the Borough Administrator during the January 2,	0.40 150.00/hr	60.00

		<u>Hrs/Rate</u>	<u>Amount</u>
	2017 re-organization meeting; the April 19, 2017 email requesting modifications to the minutes prepared by plaintiff, and related issues.		
1/10/2018	Receipt and review of email from Ms. McGarvey previously forwarded to Councilwoman Dabal regarding the April 25, 2017 Rice Notice directed to the plaintiff, and allegations regarding plaintiff's position as the Borough Administrator and entitlement to a gas stipend.	0.20 150.00/hr	30.00
	Receipt and review of email from Ms. McGarvey transmitting a chain of emails with Councilwoman Dabal regarding various issues addressed in the Complaint, and other internal Borough matters pertaining to the reorganization meeting and selection of a bank for the municipality.	0.30 150.00/hr	45.00
	Receipt and review of email from Ms. McGarvey transmitting additional emails received from Councilwoman Dabal related to her concerns about the accuracy of the March 27, 2017 meeting minutes prepared by plaintiff.	0.30 150.00/hr	45.00
	Receipt and review of email from Ms. McGarvey transmitting an Internet link to obtain the report prepared by the New Jersey Office of the State Comptroller regarding overtime abuse in the Borough of Wallington.	0.10 150.00/hr	15.00
	Receipt and review of email from Ms. McGarvey transmitting a link to a newspaper article involving the Borough Council's intention to remove plaintiff from his role as the Borough Administrator; obtain, review and highlight portions of the article.	0.30 150.00/hr	45.00
	Receipt and review of email from Ms. McGarvey to plaintiff's counsel requesting authorization from the plaintiff to obtain his personnel file.	0.10 150.00/hr	15.00
	E-mail to Ms. McGarvey confirming receipt of various documents previously provided to her by Councilwoman Dabal; intent to review budget information regarding the salary of the plaintiff and his position as the Borough Clerk and Borough Administrator, and payment of stipends for the various positions he holds in the Borough.	0.20 150.00/hr	30.00
1/11/2018	Receipt and review of email from Councilwoman Dabal regarding the return address on the envelope containing the email allegedly authored by Councilman Rachelski regarding the "big fish".	0.10 150.00/hr	15.00
	E-mail to Councilwoman Dabal regarding the "big fish" email; review of plaintiff's Bates stamped documents and the request that plaintiff provide additional documentation referenced in the Complaint.	0.20 150.00/hr	30.00
	E-mail to plaintiff's counsel requesting true copies of all emails identified in the Complaint.	0.20 150.00/hr	30.00
	Receipt and review of email from Councilwoman Dabal regarding the "big fish" email being fabricated, and confirming that the envelope containing the email with a return address of Roy Rogers was allegedly discarded.	0.10 150.00/hr	15.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/11/2018 E-mail to Councilwoman Dabal regarding the "Big Fish" email, the need to obtain metadata verifying data about that email and the potential for the email to have been fabricated.	0.20 150.00/hr	30.00
Receipt and review of email from plaintiff's counsel granting authorization to Ms. McGarvey to obtain plaintiff's employment file from the Borough of Wallington.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal addressing consequences if the "big fish" email was proven to be fabricated.	0.10 150.00/hr	15.00
Receipt and review of email from plaintiff's counsel responding to the request for all emails identified in the Complaint, and attaching two additional emails not previously provided; review emails and highlight portions for future reference.	0.30 150.00/hr	45.00
Receipt and review of additional email from plaintiff's counsel transmitting an additional email concerning items to be placed on a meeting agenda.	0.20 150.00/hr	30.00
E-mail to plaintiff's counsel and counsel for the Borough regarding the additional documentation provided by plaintiff supplementing the attachments to plaintiff's Rule 26 Initial Disclosures.	0.10 150.00/hr	15.00
1/12/2018 Review plaintiff's documents Bates stamped 1-254 constituting attachments to plaintiff's capital 26 initial disclosures; highlight portions of the documents for future reference, make notes and categorize in relation to the allegations in the Complaint.	2.50 150.00/hr	375.00
E-mail to plaintiff's counsel regarding the requested emails alleged in the Complaint.	0.10 150.00/hr	15.00
E-mail to the clients Dabal, Rachelski, Androwis and Olkowski transmitting additional emails obtained from plaintiff's counsel which are identified in the Complaint.	0.20 150.00/hr	30.00
1/15/2018 Receipt and review of email from Councilman Olkowski transmitting his draft responses to the plaintiff's interrogatories, and enclosing correspondence, emails and documents responsive to plaintiff's document demand; review and compare Olkowski's draft responses to plaintiff's written discovery demands.	0.80 150.00/hr	120.00
E-mail to Councilman Olkowski confirming receipt of his draft responses to plaintiff's written discovery demands.	0.10 150.00/hr	15.00
1/22/2018 E-mail to Ms. McGarvey requesting a telephone conference to discuss various issues related to the clients' demand for the production of emails and metadata.	0.10 150.00/hr	15.00
1/23/2018 Telephone conference with Ms. McGarvey regarding discovery issues, plaintiff's settlement demand, plaintiff's CEPA claim and First Amendment retaliation claims based upon political association.	0.70 150.00/hr	105.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/24/2018 Telephone conference with Councilman Olkowski regarding his draft responses to the plaintiff's written discovery demands, the allegations in the Complaint, and defense strategy.	0.60 150.00/hr	90.00
Receipt and review of email from Councilwoman Dabal transmitting an OPRA request submitted by a citizen to obtain stipends for all Borough employees, including those included in salaries.	0.20 150.00/hr	30.00
Receipt and review of email from Councilwoman Dabal transmitting a schedule for the preparation of minutes of meetings entitled Meeting Distribution Schedule.	0.20 150.00/hr	30.00
Receipt and review of email from Councilwoman Dabal transmitting correspondence from Councilman Olkowski to the Mayor and Borough Council regarding plaintiff's failure to timely prepare and distribute accurate minutes of Borough Council meetings	0.40 150.00/hr	60.00
Receipt and review of email from Councilwoman Dabal transmitting a Memorandum dated October 17, 2017 responding to Councilman Olkowski's correspondence requesting action to correct plaintiff's failure to timely prepare and distribute accurate minutes of the Borough Council meetings.	0.30 150.00/hr	45.00
Receipt and review of email from Councilwoman Dabal transmitting an OPRA request seeking documentation of an investigation performed by the Ruderman law firm involving plaintiff and Dabal; response provided to Councilwoman Dabal from the Borough Administrator Jane Fontana.	0.40 150.00/hr	60.00
Receipt and review of email from Councilwoman Dabal transmitting the Borough's OPRA request ledger for 2018; review and highlight portions of the ledger for future reference.	0.40 150.00/hr	60.00
E-mail to Councilwoman Dabal requesting an in-person meeting to discuss plaintiff's lawsuit.	0.10 150.00/hr	15.00
Receipt and review of two emails from Councilwoman Dabal transmitting documentation pertaining to the hierarchy of the Borough's organization.	0.20 150.00/hr	30.00
Receipt and review of email from Councilwoman Dabal transmitting a letter from the JFK Library Board of Trustees President citing irregularities involving finances and the payments of certain expenditures.	0.20 150.00/hr	30.00
1/25/2018 Receipt and review of email from Councilwoman Dabal transmitting documentation pertaining to potential regularities with the payment of energy costs for the Borough.	0.30 150.00/hr	45.00
Receipt and review of email from Councilwoman Dabal transmitting a "Third Request" letter from the State of New Jersey, Pension Fraud & Abuse Unit directed to plaintiff regarding alleged improprieties involving the inclusion of the Borough Attorney in the Borough's pension plan.	0.30 150.00/hr	45.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/25/2018 Receipt and review of email from Councilwoman Dabal transmitting a letter from the State of New Jersey Department Of Environmental Protection directed to plaintiff regarding non-compliance with state-mandated drinking water quality standards.	0.30 150.00/hr	45.00
Receipt and review of an email from Councilwoman Dabal transmitting a letter from the State of New Jersey Department of Environmental Protection directed to plaintiff containing a second letter and notice of non-compliance with state-mandated drinking water quality standards.	0.30 150.00/hr	45.00
Receipt and review of a second email from Councilwoman Dabal transmitting a letter from the Borough Attorney to Mr. Kurt Cassidy requesting immediate reimbursement to the Borough for utility charges paid on behalf of his landscaping company under a leasehold with the Borough; highlight portions of the documents for future reference.	0.40 150.00/hr	60.00
E-mail to Councilwoman Dabal regarding William Mendyk and his filing of numerous OPRA requests pertaining to plaintiff's gas allowance, overtime paid to executive employees and related matters.	0.10 150.00/hr	15.00
Exchange of additional emails with Councilwoman Dabal regarding Mr. Mendyk and his submission of various OPRA requests seeking information pertaining to stipends and overtime payments made to plaintiff and other municipal executives.	0.20 150.00/hr	30.00
Receipt and review of email from plaintiff's counsel transmitting two separate options as settlement demands.	0.20 150.00/hr	30.00
Prepare draft of a portion of the initial Loss Litigation Report.	3.70 150.00/hr	555.00
1/26/2018 Receipt and review of an email from Councilwoman Dabal transmitting an Incident Report Form involving an incident in which the Councilwoman sought to obtain a public record (copy of an ordinance) from the plaintiff's office, resulting in allegedly hostile conduct by plaintiff against the Councilwoman.	0.30 150.00/hr	45.00
Receipt and review of an email from Councilwoman Dabal transmitting correspondence from plaintiff to the Mayor and Council regarding Councilman Rachelski's disapproval of certain re-appointments to municipal boards, and an allegation that Councilwoman Dabal removed certain records (a copy of an ordinance) from his office.	0.30 150.00/hr	45.00
Receipt and review of an email from Councilwoman Dabal transmitting a copy of the minutes of the January 2, 2017 re-organization meeting of the Borough Council.	0.30 150.00/hr	45.00
Receipt and review of email from Councilwoman Dabal regarding plaintiff's refusal to produce audio tapes of the closed session meeting on December 5, 2017, receipt of a reimbursement check from KC Landscaping and the process for hiring a Borough Administrator.	0.20 150.00/hr	30.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/26/2018 E-mail to Ms. Bustamante transmitting plaintiff's counsel's email setting forth two separate options as settlement demands.	0.10 150.00/hr	15.00
E-mail to Councilwoman Dabal regarding the documentation provided as relating to the plaintiff and his allegations of retaliation.	0.20 150.00/hr	30.00
Exchange of multiple emails with Councilwoman Dabal regarding inconsistencies in the January 2, 2017 re-organization meeting that tabled a motion to re-appoint plaintiff as the Borough Administrator, as compared with the Borough Attorney's April 25, 2017 Rice Notice served upon plaintiff; transmit the Rice Notice for review.	0.40 150.00/hr	60.00
Exchange of additional emails with Councilwoman Dabal regarding inconsistencies in the minutes from the meeting dated May 1, 2017 and the minutes of the January 2, 2017 re-organization meeting that tabled a motion to re-appoint plaintiff as the Borough Administrator; request for audio recordings of certain Borough Council meetings.	0.30 150.00/hr	45.00
Telephone conference with Councilman Androwis regarding the status of the case, plaintiff's settlement demands and defense strategy.	0.80 150.00/hr	120.00
1/29/2018 Receipt and review of email from the Court rescheduling the settlement conference to March 5, 2018.	0.10 150.00/hr	15.00
E-mail to Ms. Bustamante advising that the Court rescheduled the settlement conference to March 5, 2018.	0.10 150.00/hr	15.00
E-mails to all clients advising that the Court has rescheduled the settlement conference to March 5, 2018.	0.20 150.00/hr	30.00
Receipt and review of email from Councilwoman Dabal transmitting two separate agendas for the regular meeting dated October 26, 2017 and January 25, 2018 confirming that the plaintiff provided the Borough Council with numerous sets of meeting minutes for approval that date back to meetings held in January 2017, and through various dates during and through the end of 2017.	0.30 150.00/hr	45.00
Receipt and review of email from Councilwoman Dabal transmitting documentation provided by the payroll/tax collector confirming plaintiff's \$7,500 DPW stipend is not part of his salary as the Borough Clerk.	0.20 150.00/hr	30.00
Receipt and review of an additional email from Councilwoman Dabal regarding the documentation from the payroll clerk which shows that the 3.25% raise given to the plaintiff did not apply to the \$7,500 DPW stipend.	0.20 150.00/hr	30.00
E-mail to Councilwoman Dabal regarding the information contained in several of the documents relating to plaintiff's salary and various stipends, plaintiff's potential arguments and counter-arguments to be raised based upon the documents provided.	0.30 150.00/hr	45.00

	<u>Hrs/Rate</u>	<u>Amount</u>
1/29/2018 Receipt and review of two additional emails from Councilwoman Dabal regarding the application of the 3.25% raise as not being applied to the \$7,500 DPW stipend, as a counter argument to plaintiff's position that this stipend constituted compensation for his position as the Borough Clerk.	0.20 150.00/hr	30.00
E-mail to Councilwoman Dabal regarding the DPW stipend paid to the plaintiff, and a request to schedule a meeting to discuss the documents provided, the allegations in the Complaint, defense strategy and plaintiff's optional settlement demands.	0.20 150.00/hr	30.00
Review, modify and finalize the initial Loss Litigation Report; email report to Ms. Bustamante for review.	1.50 150.00/hr	225.00
Telephone conference with Councilwoman Dabal regarding the documents produced which relate to the allegations in the Complaint, the status of investigations and defense strategy.	1.20 150.00/hr	180.00
Telephone conference with Councilwoman Dabal regarding the events transpiring within the Borough involving the plaintiff, allegations in the Complaint, the proofs necessary to establish each cause of action, plaintiff's settlement demand and defense strategy.	1.40 150.00/hr	210.00
1/30/2018 Telephone conference with Councilman Olkowski regarding the status of the case, plaintiff's settlement demands and defense strategy.	0.70 150.00/hr	105.00
For professional services rendered	61.70	\$9,255.00
Balance due		\$9,255.00

Keenan & Doris

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INVOICE

Date January 31, 2018

File No. 1005-47

Invoice No. 1630

Summit Risk Services

220 Gibraltar Road, Suite 100

Horsham, Pennsylvania

19044

Attention: Jamie Bustamante QM-0708

RE: Baginski v. Borough of Wallington

Professional services rendered from June 1, 2017 through January 31, 2018

SERVICES

Date		Description	Hrs
Jun-29-17	DMG	Review and analysis of Complaint (21 pages and 106 allegations) to prepare answer	2.50
	DMG	Telephone conference with Plaintiff's Counsel regarding facts of case	0.30
	DMG	Review and legal analysis to determine whether to remove to federal court	0.70
Jul-19-17	DMG	Telephone conference with claims specialist regarding issue of removal	0.10
	DMG	Telephone conference with Plaintiff's Counsel's office	0.10
	DMG	Comprehensive file review in preparation of preparing Notice of Removal	0.90
Jul-20-17	DMG	Telephone conference with Plaintiff's Counsel regarding removal and/or voluntary dismissal	0.20
	DMG	Preparation of Notice of Removal of Plaintiff's Complaint to Federal District Court	1.40
	DMG	Preparation of Exhibits for filing Defendants' Notice of Removal	0.30
	DMG	Preparation of Civil Case Sheet for filing Defendants' Notice of Removal	0.50

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	DMG.	Correspondence to Plaintiff's Counsel via e-mail regarding Defendants' Notice of Removal, supporting documents, request for voluntary dismissal	0.20
Jul-21-17	DMG	Email from District Court regarding assignment of magistrate and District Court judge	0.10
Jul-24-17	DMG	Email from client regarding status of case	0.20
	DMG	Correspondence to client regarding status of removal and answer	0.20
	DMG	Telephone conference with Plaintiff's Counsel's office regarding dismissal of federal claims	0.10
Aug-03-17	DMG	Review of Federal Docket for updated status	0.20
Aug-24-17	DMG	Telephone conference with Plaintiff's Counsel regarding dismissal of federal claims	0.20
	DMG	Comprehensive file review in preparation of drafting document request	1.20
	DMG	Preparation of Document request to client	0.90
	DMG	Preparation of Litigation Hold Letter	1.50
Aug-28-17	DMG	Telephone conference with Jane Fontana, Administrator for Borough regarding status of case, current issues, and named Defendants	0.60
	DMG	Telephone conference with Plaintiff's Counsel's Office regarding removal issue	0.20
	DMG	Telephone conference with Borough Administrator regarding meeting with individual Defendants	0.30
	DMG	Correspondence to client regarding document request	0.30
	DMG	Email from client regarding defendant meetings and administrative access to emails	0.20
	DMG	Review and final revision of Litigation Hold Letter	0.60
	DMG	Correspondence to Borough Administrator regarding Litigation Hold Letter	0.20
	DMG	Correspondence to Plaintiff's Counsel confirming extension to answer	0.20

Aug-29-17	DMG	Telephone conference with client confirming location of client meeting	0.20
	DMG	Meeting with clients: Jane Fontana, Melissa Dabal, and Khaldoun Androwis to prepare defense	4.30
Aug-30-17	DMG	Telephone conference with client regarding scheduling meeting with Olkowoski	0.20
	DMG	Email from Defendant Dabal regarding news article about Plaintiff	0.10
	DMG	Review and analysis of news article regarding Plaintiff being stripped of his Administrator role	0.30
	DMG	Email from Defendant Dabal regarding State of New Jersey Office of the State Comptroller Investigative Report	0.10
	DMG	Review and analysis of State Comptroller Investigative Report's findings regarding Wallington and its former Administrator (Plaintiff)	0.60
	DMG	Email from Defendant Dabal regarding Minutes from March 30, 2017 Meeting	0.10
	DMG	Review and analysis of multiple string Email correspondences between Plaintiff and Defendant Dabal regarding Minutes from March 30, 2017 Meeting	0.50
	DMG	Email from defendant Dabal regarding Banking Change VN to SS	0.10
	DMG	Review and analysis of multiple string email correspondences between Plaintiff and Defendant Dabal regarding Banking Change VN to SS	0.20
	DMG	Review and analysis of Plaintiff's statutory claim under 40A:9-165 as it relates Plaintiff's allegations of gas stipend removal	0.80
	DMG	Comprehensive file review to prepare for meeting with clients	1.00
Aug-31-17	DMG	Email from client regarding meeting with Defendant Rachelski	0.10
	DMG	Email from Defendant Dabal regarding timeline of events	0.20
	DMG	Email to Defendant Dabal to schedule a conference call	0.10
	DMG	Preparation of State Court pleading regarding removal to Superior Court	0.40
	DMG	Preparation of correspondence to Clerk, Superior Court of Bergen County advising of removal to federal court	0.20

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	DMG	Email to Plaintiff's Counsel regarding filing with state court regarding Notice of Removal	0.10
	DMG	Meeting with clients Eugeniusz Rachelski and Bryan Olkowski to obtain investigation and factual background	3.00
Sep-01-17	DMG	Telephone conference with Defendant Dabal regarding litigation defense and strategy	0.50
	DMG	Telephone conference with Defendant Dabal regarding case issues	0.60
	DMG	Telephone conference with Defendant Waricka to review draft of supplemental responses to Interrogatories	0.80
Sep-07-17	DMG	Telephone conference with claims specialist regarding legal analysis of case	0.30
	DMG	Legal Research regarding political association claim and freedom of speech claim	1.40
Sep-11-17	DMG	Receipt and review of filed notice of removal with superior court	0.10
Sep-19-17	DMG	Email from Defendant Dabal regarding news article about Wallington contractor	0.10
	DMG	Email from Defendant Dabal (2nd) regarding meeting minutes and RFQ regarding Plaintiff's position	0.20
	DMG	Review and analysis of article regarding Wallington contractor	0.20
	DMG	Review and analysis of meeting minutes in connection with plaintiff's former position of Borough Administrator	0.40
	DMG	Telephone conference with Borough Administrator regarding document request	0.10
Sep-20-17	DMG	Email to Defendant Dabal regarding status of document requests	0.10
	DMG	Preparation of employment authorization release for Plaintiff Baginski	0.60
Sep-21-17	DMG	Correspondence to Plaintiff's Counsel requesting authorization for release of employment records	0.20
Sep-24-17	DMG	Email to Plaintiff's Counsel regarding extension of time to Answer	0.10
Sep-28-17	DMG	Telephone call with client regarding meeting to obtain documents	0.20
	DMG	Meeting with client regarding new issues arising regarding internal complaints and defendant representation	1.50

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	DMG	Telephone conference with claims adjuster regarding potential conflict issues	0.20
	DMG	Telephone conference with claims adjuster regarding 90 day report	0.20
	DMG	Email from claims adjuster regarding 90 day report	0.10
Oct-02-17	DMG	Comprehensive file review in preparation of filing Answer and preparing status report	2.60
	DMG	Legal Research regarding Affirmative Defenses in preparation of filing Answer	1.50
	DMG	Preparation of Answer to Plaintiff's complaint with separate defenses	3.70
Oct-04-17	DMG	Meeting with client to review Answer and obtain additional documents	3.00
	DMG	Review documents provided by client (2nd set) in preparation of filing Answer	0.90
	DMG	Review and final revision of Answer	1.50
Oct-09-17	DMG	Telephone conference with Plaintiff's Counsel's Office requesting demand	0.20
Oct-10-17	DMG	Comprehensive file review in preparation of 90 Day litigation report	1.70
	DMG	Preparation of 90 day litigation loss report	3.70
Oct-11-17	DMG	Preparation of initial case budget	1.60
Oct-12-17	DMG	Revision of 90 day litigation loss report	0.80
	DMG	Email to claims adjuster regarding 90 day litigation loss report, initial budget, and conflict issues	0.40
Oct-13-17	DMG	Telephone conference with Defendant Androwis regarding status of case	0.40
	DMG	Telephone conference with claims specialist regarding conflict issue	0.30
	DMG	Review and analysis of conflict issues in preparation of reporting back to carrier regarding separate counsel required	0.30
	DMG	Email to claims specialist regarding separate counsel	0.10

Oct-16-17	DMG	Correspondence from Court regarding letter order	0.10
	DMG	Review and analysis of letter order from Court regarding initial disclosures,	0.20
Oct-17-17	DMG	Telephone conference with client regarding additional documents requested	0.20
	DMG	Attendance at meeting with client regarding additional documents requested	0.30
	DMG	Receipt and preliminary review of additional documents provided by client	0.30
	DMG	Email to Borough Administrator regarding request for additional documents	0.20
Oct-19-17	DMG	Email from Defendant Dabal regarding request for status of case	0.10
	DMG	Email from Defendant Dabal regarding document request	0.10
	DMG	Telephone conference with Borough attorney regarding status of case and issues with Plaintiff	0.30
	DMG	Telephone conference with claims adjuster regarding status of conflict request	0.10
	DMG	Email to Defendant Dabal regarding status of case	0.20
Oct-23-17	DMG	Email from the Business Administrator regarding document request	0.10
	DMG	Telephone conference with Borough attorney regarding meeting with defendants	0.10
	DMG	Email to Defendant Dabal regarding document request	0.10
	DMG	Correspondence to Borough Attorney requesting documents regarding advertisement of the Borough Administrator position	0.20
Oct-24-17	DMG	Email from Melissa Dabal regarding previous document request	0.10
	DMG	Email to Melissa Dabal regarding previous document request	0.10
Oct-25-17	DMG	Correspondence from Borough attorney regarding request for documents	0.10
	DMG	Receipt and preliminary review of documents provided by Borough attorney regarding advertisement for Borough Administrator position	0.30

Nov-01-17	DMG	Email from Co-Counsel requesting contact information of individual defendants	0.10
	DMG	Email to Co- Counsel providing contract information for individual defendants	0.20
	DMG	Email to Borough Administrator regarding contact information for Khaldoun Androwis	0.10
	DMG	Correspondence from Federal District Court regarding filed Substitution of Attorney	0.10
Nov-13-17	DMG	Email from claims specialist regarding new counsel for individual board members	0.10
	DMG	Telephone conference with incoming counsel for individual defendants to discuss status and details of the case	0.90
	DMG	Email to Counsel for individual defendants regarding filed Answer	0.10
	DMG	Email to new Counsel for individual defendants regarding filed Answer	0.10
	DMG	Preparation of Joint Discovery Plan	0.60
	DMG	Email draft of Joint Discovery Plan to Counsel for individual defendants for review and revision	0.10
Nov-14-17	DMG	Email from Co-Counsel regarding proposed Joint Discovery Plan	0.10
	DMG	Email to Co-Counsel regarding Discovery Confidentiality Order	0.10
	DMG	Email from Co-Counsel regarding Substitution of Attorney	0.10
	DMG	Review and analysis of Substitution of Attorney for the individual defendants	0.10
	DMG	Email to Co-Counsel consenting to my electronic signature for Substitution of Attorney	0.10
	DMG	Correspondence from Co Counsel regarding Discovery Confidentiality Order	0.20
	DMG	Email from Co Counsel regarding client documents	0.10
	DMG	Email to Co-Counsel providing some client documents	0.10
	DMG	Email from Borough Administrator regarding contact information for Khaldoun Androwis	0.10

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	DMG	Email to Co Counsel providing contact information for Khaldoun Androwis	0.10
Nov-15-17	DMG	Review and revision of draft of joint discovery order to include Confidentiality Order	0.10
	DMG	Email to Counsel regarding proposals in joint discovery order	0.20
Nov-16-17	DMG	Email from Plaintiff's Counsel regarding revision and filing of joint Discovery Plan	0.10
	DMG	Email from Counsel for Co-Defendants consenting to joint discovery Plan	0.10
	DMG	Correspondence from Court regarding filed joint discovery plan	0.10
Nov-22-17	DMG	Emails to and from Plaintiff's Counsel regarding authorization for release of Plaintiff's personnel file in preparation of Rule 26 disclosures	0.20
Nov-30-17	DMG	Appear for/attend Rule 16 Conference with Judge and all Counsel	2.50
	DMG	Correspondence from Court regarding Pre-Trial Scheduling Order	0.10
	DMG	Review and analysis of Pre-Trial Scheduling Order	0.30
	DMG	Email from Court regarding minute entry proceedings held	0.10
Dec-01-17	DMG	Preparation of Defendant's Rule 26 Disclosures	0.40
	DMG	Email to Business Administrator regarding individuals with knowledge in preparation of Rule Disclosures	0.20
	DMG	Preliminary review of 2014 Employee handbook, 2016 employee handbook, and Wallington Resolutions in preparation of documents produced with Rule 26 Disclosures	2.30
Dec-02-17	DMG	Preparation of Discovery Confidentiality Order for submissions to Counsel and Court	0.60
	DMG	Email to Counsel regarding review and approval to file Discovery Confidentiality Order	0.10
	DMG	Email to Counsel for the individual defendants regarding 2002 meeting minutes with recommendation of gas stipend from Mayor	0.20
Dec-04-17	DMG	Email from Business Administrator regarding individuals with knowledge in preparation of Rule 26 Disclosures	0.10

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	DMG	Telephone conference with Board attorney regarding individuals with knowledge in preparation of Rule 26 Disclosures	0.30
Dec-05-17	DMG	Email from Counsel for individual defendants' regarding meeting minutes	0.10
	DMG	Email from Counsel for individual defendants' regarding consent to file Discovery Confidentiality Order	0.10
Dec-06-17	DMG	Email to Business Administrator regarding her identification as an individual with knowledge	0.20
	DMG	Email to Plaintiff's Counsel regarding consent to file Discovery Confidentiality Order and executed release from Plaintiff regarding employment records	0.10
	DMG	Correspondence to Court regarding consent from parties to enter Discovery Confidentiality Order	0.20
	DMG	eCourts filing: proposed Discovery Confidentiality Order	0.10
	DMG	Correspondence from Court regarding filed proposed Discovery Confidentiality Order	0.10
Dec-08-17	DMG	Email from Court regarding entry of Discovery Confidentiality Order	0.10
Dec-11-17	DMG	Email from Co-Counsel regarding request for resolutions	0.10
	DMG	Email to Co-Counsel attaching resolutions and bates stamped documents	0.20
Dec-14-17	DMG	Email from Co Counsel regarding draft of individual defendants' Rule 26 disclosures	0.10
	DMG	Review and analysis of Co-Counsel's draft of Rule 26 disclosures on behalf of individual defendants	0.20
	DMG	Telephone conference with Co-Counsel regarding revisions to Rule 26 disclosures and other discovery issues	0.30
	DMG	Revision of Borough's Rule 26 disclosures	0.20
	DMG	Correspondence to Counsel enclosing Rule 26 Disclosures and providing documents	0.20
Dec-21-17	DMG	Comprehensive file review in preparation of drafting Defendant's discovery Requests	1.50
	DMG	Preparation of Defendant's Request for Production of Documents to Plaintiff	2.00

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	DMG	Preparation of Defendant's Interrogatories to Plaintiff	1.60
	DMG	Email to Plaintiff's Counsel regarding Defendant's discovery requests	0.10
	DMG	Emails from and to CO Counsel regarding meta data discovery issues	0.20
	DMG	Correspondence from Co Counsel regarding individual defendants' discovery requests on Plaintiff	0.20
Dec-22-17	DMG	Telephone conference with Defense Counsel for individual defendants regarding meta data discovery issues	0.60
	DMG	Email from Counsel for Co-Defendants regarding discovery requests relating to metadata	0.10
	DMG	Correspondence from Co-Defendants regarding request for documents to Defendant Borough	0.10
	DMG	Receipt and preliminary review of Co-Defendant's document request to Borough requesting meta data search	0.20
Dec-26-17	DMG	Email to client requesting document search fee and document requests	0.20
	DMG	Email to client regarding request for meta data search fee and request for documents	0.20
	DMG	Telephone conference with client regarding electronic discovery issues and status of discovery	0.30
	DMG	Review of Resolution documents regarding gas stipend	0.40
	DMG	Email from client regarding IT specialist contact information for electronic discovery request	0.10
Dec-27-17	DMG	Telephone conference with IT Specialist regarding electronic preservation and IT search	0.30
	DMG	Preparation of Litigation Hold Letter to IT Specialist for Borough	0.80
	DMG	Email to Borough IT specialist regarding preservation of documents, Litigation Hold Letter, and document requests regarding electronic discovery	0.40
Jan-02-18	DMG	Correspondence from Counsel or Defendants to Plaintiff's Counsel regarding Plaintiff's Rule 26 Disclosures and Plaintiff's discovery requests	0.10
	DMG	Emails from and to Plaintiff's Counsel regarding delay in Rule 26 Disclosures and Plaintiff's discovery requests	0.20

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	DMG	Review and analysis of correspondence from IT specialist regarding IT issues	0.30
	DMG	Review and analysis of 2nd correspondence from IT specialist regarding IT issues	0.20
	DMG	Telephone conference with Counsel for individual defendants regarding IT Document request and discovery issues	0.50
	DMG	Telephone conference with IT Specialist regarding request for additional documents	0.10
Jan-05-18	DMG	Telephone conference with IT specialist regarding IT production and document retention issues for the Borough	0.40
	DMG	Email from claims specialist regarding updated 90 day report	0.10
Jan-06-18	DMG	Comprehensive file review in preparation of updated status report	0.90
	DMG	Preparation of updated 90 day status report	0.70
	DMG	Email to claims specialist regarding updated 90 day report	0.10
Jan-09-18	DMG	Email from Plaintiff's counsel discovery requests served on Borough, discovery requests served on Borough, and document production in connection with Plaintiff's Rule 26 disclosures	0.10
	DMG	Review and analysis of interrogatories served on individual defendants	0.20
	DMG	Review and analysis of document demands served on individual defendants	0.20
	DMG	Receipt and preliminary review of interrogatories served on Borough	0.20
	DMG	Receipt and preliminary review of document demands served on Borough	0.50
	DMG	Receipt and preliminary review of documents served on Borough from Plaintiff in connection with Plaintiff's Rule 26 disclosures	0.60
Jan-10-18	DMG	Email from Counsel for Defendant Dabal providing authorization to forward client communications	0.10
	DMG	Review of emails and documents provided by Defendant Dabal	0.40
	DMG	Correspondence to Counsel for Defendant Dabal regarding documents/emails previously provided to me from Defendant Dabal	0.20

	DMG	Email to Plaintiff's Counsel requesting authorization for Plaintiff's employment records	0.10
	DMG	Emails from and to Counsel for Codefendants to Plaintiff regarding additional time to provide responses to discovery	0.20
Jan-11-18	DMG	Receipt and preliminary review of additional documents produced by client in preparation of responding to Plaintiff's discovery requests	0.30
	DMG	Telephone conference with Jane Fontana regarding issues at the Borough and her resignation	0.60
	DMG	Email from Plaintiff's Counsel regarding supplemental document production	0.10
	DMG	Review and analysis of supplemental document production	0.10
Jan-12-18	DMG	Email from Counsel individual defendants regarding Plaintiff's supplemental production	0.10
	DMG	Email from Counsel individual defendants regarding "big fish" email	0.10
Jan-23-18	DMG	Telephone conference with claims specialist regarding issues with case, problems with the Borough and	0.30
	DMG	Telephone conference with Plaintiff's Counsel's office requesting demand in advance of settlement conference	0.20
	DMG	Telephone conference with Co Counsel regarding issues with settlement, issues with discovery, and litigation strategy	0.40
Jan-24-18	DMG	Emails from and to Plaintiff's Counsel regarding request for demand and issue of retirement	0.20
Jan-25-18	DMG	Review and analysis of Plaintiff's settlement demand	0.20
	DMG	Email to claims specialist regarding Plaintiff's settlement demand	0.10
Jan-29-18	DMG	Correspondence from Court rescheduling settlement conference	0.10
	DMG	Email to claims adjuster regarding rescheduled date for settlement conference	0.10

Total professional services rendered	93.20
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DISBURSEMENTS

Jul-20-17	Filing Fee - USDC-NJ -Notice of Removal	400.00
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Sep-01-17	Courier - New Jersey Lawyers Service	7.60
	Courier - New Jersey Lawyers Service	7.60

Totals		\$415.20
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Total Fee & Disbursements		\$14,395.20
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Balance Now Due		\$14,395.20
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Fee Summary:

Lawyer	Hours	Rate	Amount
Debra McGarvey	93.20	\$150.00	\$13,980.00

January 31, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
01/04/18	0.8	Notify some prof. Of appt; prepare contracts
01/05/18	0.9	Review maps prepared by Neglia for Lucia Place Cedar Street; Prepare letters to property owners
01/08/18	0.8	review Subpoena served on Baginski; ph. Conf w. atty for Fehl; prepare letter confirming Baginski to remain "on call";
01/09/18	3.6	Legal research - police hire; prepare numerous resolutions for public meeting
01/10/18	2.2	Prepare additional resolutions; prepare revised demand letter for KC Land.
01/11/18	2.6	Receive inf. From Tanderis; prepare Ordinance; prepare letter to Labor Attys.
01/12/18	0.7	Ph. Conf. W. NJLM; post ad for adm.;

01/17/18	1.8	Prepare legal notice spec. meeting ; research potential w-2 operators; prepare resolutions ; ph. Conf w. new risk manager
01/18/18	2.4.	Attend meeting; provide docs. To labor atty; prepare contracts;
01/19/18	0.9	Receive response to adm, RFQ; receive request for courtesy copy of RFQ;
01/22/18	1.9	Receipt review letter re: NJ Fuel LLC.; prepare resolution; review all responses to auditor RFQ;
01/24/18	1.3	Review comments re: vacant land analysis; review prior Court order; prepare letter to Judge Toskos and special master;
01/25/18	1.8	Prepare Ord.; ph. Conf. Re: appoint. Of Auditor; Prepare resolution
01/26/18	2.9	Receive memo from Judge Toskos; prepare lettr. To Court; Prepare response to McManus; receive ltr. From Nursery 2Go; Prepare numerous resolutions; ph conf w/ risk manager;
1/29/18	1.5	Prepare Court Order per Judge Toskos; ph conf w/ engineer re: missing documents; receive responses;
1/30/18	0.9	Prepare letter Genova Burns; contact special Master; prepare resolution
1/31/18	3.2	Prepare various resolutions including Mt. Pleasant and King Street projects; review contract award-Civic Center generator; corresp. from Court; ph conf w/Walentowicz

30.2

February 28, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
02/01/18	1.9	Research municipal land use law; prepare RFQ; prepare notice requesting applications; ph call environmental
02/2/18	3.7	Prepare numerous resolutions; receive reports from Stolarz; meeting with Sontz in office regarding Ordinance changes;
02/05/18	2.9	Review all docs. and contracts with appraisal systems for 2014 reassessment; receive proposed contract for police officer; review PBA contract for steps;
02/06/18	1.9	Review proposed agreement with Carlstadt; ph conf with Judge from Carlstadt; review COAH Pleadings;
02/7 /18	5.9	Attend meeting of the Bergen County Board of Taxation; ph conf w various professionals re: issues in tax matter; prepare letter to Board secretary; prepare numerous resolutions; ph conf w Brendis Montijo-Wrigley; meeting with Sontz in office;
02/08/18	2.9	Prepare numerous resolutions; numerous ph conf re: shared services with Carlstadt; ph conf w Hannon, Esq; send numerous docs to Hannon; receipt of docs from Neglia re: Garbage bids;

02/9/18	3.8	Numerous ph calls w Carlstadt representative; prepare several resolutions; perform legal research garbage issue; ph conf w appraisals system;	
02/12/18	3.9	Receive review forensic acct report; ph conf w Merkel re: claim; receive letter from Merkle via e-mail; numerous ph confs w. Brendis, Borough att. for Carlstadt; receive memo from Genova Burns; Ph conf w admn candidates set up interviews; prepare numerous document requests;	
02/13/18	3.8	ph conf w Genova Burns re: employee issue; receive docs from Clerk send to Genova Burns; review information on bank accounts; legal research	
02/14/18	2.7	Numerous ph conf w Carlstadt officials; legal research re; land use RFQ;	
02/15/18	3.7	Prepare RFQ; send courtesy copies of RFQ; receive report from forensic acct; prepare demand letter to KC, prepare letter to insurance company;	
02/16/18	4.9	Attend interview of three Admn candidates; receive letter from Court Admn; Prepare numerous resolutions and prepare docs requests;	
2/20/18	2.9	Ph conf with League; research CFO RFQ; numerous ph conf re: Carlstadt Court; receive contract from League; prepare ad; ph conf with candidate;	
2/21/18	3.7	Ph conf w Zisa; ph conf w Appraisal Systems re: tax issues; ph.conf w. League of Municipalities; prepare Ordinance; prepare resolutions; left message COAH;	
2/22/18	2.8	Receive proposal from Appraisal Systems; ph.conf w/McMannus; ph conf w/administrator candidate; ph conf atty for RFQ; send out numerous courtesy RFQs; ph. Conf re: Carlstadt; ph. Conf w/expert	
2/23/18	4.4	Research re: garbage contract; prepare letter to judge Toskos; prepare Court Order; prepare memo proposed dates to McMannus; prepare resolutions;	

2/27/18	3.8	Attend meeting; ph. Conf w. Merkel re: claim; ph. Conf w/Novello, esq - development in east Rutherford affecting sewage lines; prepare resolutions;
2/28/18	3.9	Prepare Ordinances; prepare resolution; conf w/Appraisal systems; ph conf w companies re: documents ; ph conf and email from t-mobile; hrs ph conf; Carlstadt Board Atty meeting investigator re: road incident; ph conf w crisi re shared services; prepare marijuana ord.; receipt of Court
<u>63.5 hrs</u>		

March 29, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
03/01/18	2.8	Several ph. conf w/Boro of Carlstad; prepare "Rice" Notice to all Court Personnel; receive OPRA request;
03/02/18	3.3	Prepare ordinances for review next meeting;
03/05/18	3.7	Attend meeting, ph.conf w/Genova Burns re: Kudlacik contract and PBA negotiations review COAH; review successful bids; ph.conf w/ Risk managers re: confirm agent for all insurance coverage;
03/06/18	3.9	Several ph.conf w/Carlstadt Boro Atty; ph.call w/Novello, Esq receive letter re: laterals; receive proposal from Carlstadt; draft Indemnification; review Shade Tree Ordinance;
03/07/18	4.8	Prepare numerous resolutions; research ordinances from other towns; Prepare e-mail to Risk Manager
03/08/18	3.6	Prepare resolutions; ph.conf proof of loss- Police Building; research and copy documents in response to Infante OPRA request
03/12/18	5.5	Prepare memo to expert re: COAH litigation availability for ph. conf. and mediation session; receive reply; prepare memo to McManus/Bauers reavailability; receive and review various insurance policies from Bergen Risk Managers, INC; receive reservation of Rice Letter; prepare letter to forensic accountant and to auditor; prepare resolutions; various ph conf / emails re: Infante status and shared

service agreement; prepare resolutions; ph confs w several employees sued by former firefighter

- | | | |
|----------|-----|--|
| 03/14/18 | 2.7 | Receive e-mails from Coah master receipt of numerous OPRA requests; draft e-mails; ph.conf re: document request; prepare Rice Notices - Court; prepare admin. advertisement; |
| 03/15/18 | 3.8 | Review documents; prepare letter to insurance company; prepare resolutions; ph.conf.w/Carlstadt representatives; review terms/conditions of insurance coverage; |
| 03/19/18 | 3.6 | Attend meeting; review document responses; prepare letter to Hannon, Esq.; prepare e-mail to McManus; schedule meeting re: Coah; review report from expert; |
| 03/22/18 | 2.9 | Ph.conf w/Weinet, Esq; prepare resolution "safe/secure"; revise ordinance; ph.conf w/McManus; ph.conf w/Genova Burns; ph.conf re: Carlstadt Court; review insurance claim |
| 03/23/18 | 3.9 | Prepare resolutions; prepare letter to Judge Toskos and proposed Order; corresp w/Country re: Courts |
| 03/26/18 | 3.7 | Prepare resolution ph.conf and letter from Sordo, Esq; ph.conf w/Atty for PSE&G; receive resume from Polce; numerous ph.conf w/candidates; ph.conf w/Carlstad |
| 03/27/18 | 3.9 | Ph.conf w/Wrigley; ph.conf with Carlstadt; prepare several Rice Notices; numerous emails and ph. Conf. W/ candidates; prepare letter re: Corner Collection; prepare Resolution; |
| 03/28/18 | 3.8 | Review resumes for violation clerk; set of interviews; ph.conf re: investigation; prepare letter to insurance company; ph.conf.w/Hannan; review application request for standing Certificate; ph.conf./w. CFO candidate; |
| 03/29/18 | 5.7 | Attend interviews for CFO and administrator; prepare contract review Hannon's comments: |

61.6 hrs

April 30, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
04/02/18	3.8	Meeting with several violation Clerk candidates; prepare resolutions; ph.conf.w. Civil Serv. ;
04/03 /18	4.5	Meeting with candidates Violation Clerk; ph. Conf. W. Adm. Cand.; Receipt review numerous e-mails; ph.conf.w.Brendis Wrigley; ph.conf. Police contract; prepare resolutions;
04/04 /18	5.6	Attend Bergen County Board of Taxation re: adjournment ; attend law library re: research adm. code lay off civil service; prepare numerous resolutions; prepare rice notices
04/13/18	4.6	Review OPRA Request; review letters from Job; prepare Rice Notice; receipt review two separate motions to Intervene; pn.conf w. Lamb; Esq
04/17/18	3.9	Prepare notice; prepare letter to clerk w/all resumes for Boro Admn and CFO positions receipt review lawsuit filed by Morning side at Wallington; ph.conf w/Beattie Padovano; supply report - COAH
04/19/18	3.7	Review lawsuit; prepare proposed Order and letter to Judge Toskos; ph.conf. W/ Genova Burns; prepare resolutions;
04/20/18	3.8	Revise contract for Captain; Ph.conf.w Sorto; prepare OPRA response
04/23/18	1.7	Ph.conf w Risk Manager; receive docs from Risk manager; ph.conf.w atty for proposed intervener; revise contract;

04/24/18	2.2	Prepare resolution; receive insurance documents; ph.conf w/ Sontz; review statue;
04/25/18	3.7	Ph. conf w/Sontz; review statutory law; review revised agreement from Donahue, Esq.; ph. conf w/Genova Burns; receive Order from Toskos; prepare letter to all COAH counsel;
04/26/18	4.8	attend meeting w/boro administrator; revise contract;
0427/18	4.6	revise contract; review COAH all pleadings; serve Order upon all counsel of records; prepare answer and separate defenses to law suit; research re: conflict in representing clerk; ph.conf.
04/30/18	3.7	very lengthy ph. conf w. Division of Commercial recording re: short form - standing; revise answer; receive revised letter from Mizdol;

June 4, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
05/01/18	2.8	review changes to agreement from Judge Mizdol; ph.conf w/Donahue, Esq, prepare resolution;
05/02/18	3.9	prepare resolutions,; receive Order from Judge Toskos; receive letter from John Lamb, Esq; ph.conf w/county searching for town incorporation;
05/7/18	4.6	Receipt of Answer filed on behalf of Wallington; attend Bergen Cty Register Office - perform search of incorporation records; receive letter from Judge Mizdol; ph.conf w/ Genova Burns; prepare resolutions; attend meeting;
05/09/18	5.3	Attend hearing Bergen County Board of Taxation; receive memo from Markel; receive memo from Hannon; ph.conf w/ Civil services; prepare letter re: town action; prepare resolutions;
05/11/18	1.9	Ph.conf w/ atty. for Morningside; prepare resolutions ;
05/14/18	3.2	Prepare resolutions; ph.conf w/Genova; receive docs. from Neglia;
05/17/18	0.8	Receive Stip of Dismissal; ph.conf w/atty. for intervener;
05/18/18	1.9	Receipt/review Notice of Motion to Intervene; Cert.of Bonshall. Esq; Cert. Of James Nucle and legal Brief; research case law cited in legal Brief

05/21/18	1.6	Review numerous OPRA requests; review statute and caselaw re: exceptions and e-mails as documents;
05/22/18	2.8	Prepare numerous resolutions; ph.conf w/ COAH atty and mediator;
05/23/18	1.7	Review documents to respond to OPRA; ph.conf. W/Sarto, Esq; ph.conf w/civil service; ph.conf. W/Donahue, Esq from Carlstadt;
05/24/18	3.2	meeting w/Chief re: Contract; revise Contract; prepare numerous resolutions including 2 shared services; ph.conf with civil service;
05/29/18	1.9	ph.conf w/planner re:RFQ appts; revise contract;
05/30/18	2.7	Revise case law & statute; prepare OPRA response; ph.conf w/detective
05/31/18	3.7	Research for Ordinance; review all documents to apply for EPL; prepare street resolution; review vacation documents; letter from PBA;

42.00 HRS

July 2, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
06/05/18	0.9	Ph.conf w/detective; review agreement; ph.conf.w/atty for intervener
06/06/18	2.7	Lengthy ph.conf w/Frascella; Division of Alcoholic Beverages; ph.conf. W/Molinelli, Esq; ph.conf. W/Robert Kaye, Esq (2x), review Det. Rock e-mails; ph.conf w/intervenor
06/07/18	3.6	Receive e-mail and documents from attorney for Claude Branda; prepare several resolutions; attend special meeting;
06/08/18	2.9	Prepare Ordinance; ph.conf. W Neglia re: delinquent field projects; prepare letter;
06/12/18	1.9	Review file re: vacation of certain properties; review report of Sontz, Esq re: rent leveling; review docs submitted by ANUHEA Property; ph.conf w. Molinelly, Esq and Kaye. Esq re: liquor licence transfer and amendment filed with the Alcohol Beverage; send risk manager authorization signed by Mayor;
06/13/18	3.5	Call several appraisal companies; review lengthy e-mail from Kaye, Esq; ph.conf w. Lieutenant L.T. Rock; prepare resolution; revise indemnification; Agreement sent to council; lengthy phone conference with Turtletaub, Esq., re: refusal of job to perform work to release bond re: 165 Paterson Ave/ 12 Locust

06/14/18	3.8	Prepare numerous resolutions; prepare rice notice; prepare letter to 3 appraisal companies;
06/15/18	3.4	Prepare Ordinance; prepare resolutions;
06/18/18	2.9	Ph.conf with detective; receipt review of Court Order granting Morningside leave to Intervene; review materials re: liquor license transfer and memo from ABC;
06/19/18	1.6	Prepare resolutions; ph.conf. w/ counsel re: COAH litigation;
06/25/18	1.9	Ph conf w McManus, prepare resolution: ph conf liquor license
06/26/18	4.2	Receive info from tax collector, prepare letter to Court, prepare ordinance; search for public contracts info at request of auditor: review contract received from Borough of Carlstadt
6/27/18	3.2	Prepare order, prepare letter to Judge Toskos and all counsel: prepare auditors letter; prepare resolution; review docs liquor license;
06/28/18	4.1	Meeting w land use candidate; Prepare resolution; ph.conf. W. Atty for Carlstadt; receive numerous letters to Court from interveners; ph.conf. Re: properties to be vacated; ph.conf w/ Bull re: liquor license;
06/29/18	1.4	send resolution and information to Bonchi, Esq; prepare memo to Simon, Esq; ph.conf w. Donahue, Esq; prepare letter together with signed contract;

42 hrs

BOROUGH OF WALLINGTON

CIVIC CENTER

24 UNION BOULEVARD

WALLINGTON, N.J. 07057

TEL. (973) 777-0318 FAX (973) 779-4879

VOUCHER**VOUCHER MUST BE RETURNED FOR PAYMENT**

Signed voucher together with your invoice must be received by the Borough
Clerk on the Monday prior to the 15th of the month

V S
E H
N I
D P
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R O

Richard S. Cedzidlo**177 Paterson Avenue****Wallington, NJ 07057****ALL SHIPMENTS MUST BE SENT PREPAID**

DATE OF ORDER		DATE REQUIRED	P.O..B. DESTINATION UNLESS SPECIFIED		ACCOUNT NUMBER
10/31/18		OPERATING FUND			
QUANTITY	UNIT	DESCRIPTION OF MATERIALS OR SERVICE		UNIT PRICE	AMOUNT
		September 28, 2018 through October 31, 2018			
		Hours 49.8 @ \$100.00 per hour			\$4,980.00
		Reimburse expenses (Parking Newark NJ; parking Hackensack 3x)			\$35.00
NEW JERSEY SALE TAX EXEMPT # 22-6002365				TOTAL	\$5,015.00

CLAIMANT'S CERTIFICATION AND DECLARATION

I DO SOLEMNLY DECALRE AND CERTIFY UNDER THE PENALTIES OF LAW THAT THE WITHIN BILL IS CORRECT IN ALL ITS PARTICULARS; THAT THE ARTICLES HAVE BEEN FURNISHED OR SERVICES RENDERED S STATED THEREIN; THAT NO BONUS HAS BEEN GIVEN OR RECEIVED BY ANY PERSON OR PERSONS WITH THE KNOWLEDGE OF THIS CLAIMANT IN CONNECTION WITH THE ABOVE CLAIM, THAT THE AMOUNT THEREIN STATED IS JUSTLY DUE AND OWING; AND THAT THE AMOUNT CHARGED IS A RESONABLE ONE

VENDOR SIGN

SIGNATURE

10/31/18

DATE

TITLE Attorney

OFFICER'S OR EMPLOYEE'S CERTIFICATION

HAVING KNOWLEDGE OF THE FACTS AND IN THE COURSE OF REGULAR PROCEDURES, I CERTIFY THAT THE MATERIALS AND SUPPLIES HAVE BEEN RECEIVED OR THE SERVICES RENDERED; SAID CERTIFICATION IS BASED ON DELIVERY SLIPS ACKNOWLEDGED BY A MUNICIPAL OFFICIAL OR EMPLOYEE OR OTHER RESONABLE PROCEDURES

DATE

DEPARTMENT HEAD

NO ORDER VALID UNLESS SIGNED BY	APPROVAL TO PAY	APPROPRIATION CHARGED	AMOUNT
DEPARTMENT HEAD _____ DATE _____	FOOTINGS AND EXTENSIONS _____ DATE _____	_____	_____
TREASURER - CERTIFICATION OF FUNDS _____ DATE _____		_____	_____
ADMINISTRATOR - APPROVAL TO PURCHASE _____ DATE _____		_____	_____
		CHECK DATE	CHECK NO

October 31 , 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
10/01/18	0.9	Receipt of flash drive from Bonsall, Esq containing docs; receipt of motion papers from Simon;
10/02/18	1.6	Review lengthy letter submitted by Bonsall to Judge Farrington; prepare Certification;
10/03/18	2.8	Prepare response to opposition filed by Bonsall, Esq; ph.conf. W/ Crown Castle; review proposed consent; prepare resolution; prepare Rice notice;
10/04/18	3.9	Receipt of Order entered by Judge Farrington; ph.conf. W/ Simon, Esq (2X); ph.conf. w/Szabo; prepare e-mail; ph.conf w/McManus; prepare numerous resolutions; receive e-mail re: wi-14 County Counsel - senior center;
10/05/18	1.9	Receipt review lawsuit filed by Umdasch Real Estate; research files for resolutions or ordinances;
10/09/18	1.6	Receive e-mail from Bonsall; prepare letter to Bonsall; ph.conf. Re: consent to sublease;
10/10/18	5.7	Prepare resolutions; attend meeting with planner and Simon in Warren NJ; receive memo from Mc Manus and respond; prepare newspaper notice;

10/19/18	2.9	Receipt/review of Order to Show Cause in Donald Nucle v. Boro of Wallington; review Verified Complaint; research allegations of Complaint and Statute;
10/23/18	2.7	Review various Opra requests; receive various e-mails re: COAH lawsuit; provide Simon/Szabo with documents and Borough Code
10/24/18	4.8	Review analysis from Szabo; receive e-mail from Szabo; receive e-mail from McManus; prepare letter to Court on KC Landscaping; attend borough letter search for Affordable Housing reports and resolution; review numerous e-mails; receive call on DOKA lawsuit; apply for extension on time to Answer; ph.conf w/Kafafian; prepare e-mail;
10/25/18	4.4	Ph. Conf w/ Steinhagen, Esq review lawsuit; legal research summary actions in OPRA cases; prepare Verified Answer and Affidavit of Victor Polce; prepare resolutions for public meeting; ph. Conf w/ Comt re: KC landscaping
10/26/18	1.6	Prepare letter notifying KC of adjournment; prepare letter re: Crown castle; deliver answer to Farrington;
10/29/18	6.7	Attend all day Court ordered mediation - Newark NJ; conference re: DOKA Lawsuit
10/30/18	3.9	Attend OSC-Judge Farrington re: Nuckle v Wallington; prepare Consent Order - COAH; prepare Notice of special meeting;
10/31/18	4.4	Attend CMC before Judge Farrington re: COAH Lawsuit; Ph. Conf with Lamb, Esq; prepare resolutions;

49.8 hrs

**RICHARD S. CEDZIDLO
ATTORNEY AT LAW
177 PATERSON AVENUE
P. O. BOX 3127
WALLINGTON, NEW JERSEY 07057**

**(973) 472-1133
FAX: (973) 472-1135**

November 30, 2018

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
11/01/18	0.9	Review numerous OPRA requests; prepare response;
11/02/18	1.8	Review documents and proposals from Mc Carter & English; receive correspondence settlement offer;
11/07/18	2.9	Review lawsuit filed by Parent Company for DOKA; prepare answer to complaint filed by DOKA; file answer via e-courts; Review e-mails - COAH;
11/08/18	4.4	Attend Special Meeting; Ph.conf w.Lamb, Esq re: new proposal of Nuckle for COAH litigation; prepare resolution; receipt /review of Aff.of Services submitted by Kaffafian;

11/15/18	4.8	Review OPRA Request; receive Settlement Offer from Daniel Steinhagen, Esq re: WREIT Property; review e-mail re: COAH; prepare notice of RFQs; prepare RFQ for all professionals;
11/16/18	3.8	Review OPRA response; receipt/review Motion to Intervene and Dismiss Complaint ; receive e-mails COAH; prepare letters to all professionals - RFQs;
11/19/18	3.9	review numerous e-mails re: COAH; request from Simon for meeting; receive e-mail from Mc Manus re: dates for mediation; review letter of intent re: DPW Contract; prepare DPW contract and sent to DiPalma for review and approval;
11/27/18	4.8	Attend mediation session Warren NJ; Research past redevelopment plan and easement litigation; ph.conf. Re: close out bond;
11/28/18	0.6	Ph. Conf w/ Kafafian, Esq; check on status of OPRA response;
11/29/18	5.7	Attend two mediation sessions, Newark NJ; ph.conf. W/ rep for Crown Castle; receive signed contract from Teamsters;
11/30/18	0.4	Receive several letters from intervenor in Doka lawsuit: receive email from atty for Donald Nuckel

34.00 hrs.

LAW OFFICES OF GARY J. CUCCHIARA, LLC

30 Park Avenue, Lyndhurst, New Jersey 07071

Office (201) 939-9333 ~ Fax (201) 939-9336

Email: cucchiara law@gmail.com

~
Glen Gardner and Kenil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenil, New Jersey 07847

August 15, 2016

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

Attached please find an invoice for services rendered for the month of July 2016.

Thank you.

Very truly yours,

Gary J. Cucchiara, Esq.

Gary J. Cucchiara, Esq.

GJC:gnc

attachment

LAW OFFICES OF GARY J. CUCCHIARA, LLC

30 Park Avenue, Lyndhurst, New Jersey 07071

Office (201) 939-9333 ~ Fax (201) 939-9336

Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218

605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421

469 Route 46 West, Kenvil, New Jersey 07847

Email: cucchiara law@gmail.com

INVOICE DATE: August 15, 2016

INVOICE NO.: W16-128

Borough of Wallington

Civic Center

24 Union Boulevard

Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

SERVICES RENDERED FOR THE MONTH OF JULY 2016

7/5	.5	Review correspondence from borough attorney and file; correspondence to borough attorney; telephone conference with same.
7/15	2.6	Review file documents and notes; correspondence to assessor and appraiser; review correspondence from appraiser; telephone conference with appraiser; preparation of settlement memo.
7/18	2.3	Revisions to settlement memo; review correspondence from appraiser; correspondence to appraiser and borough attorney; review file and notes; attendance at meeting of governing body.
7/20	.7	Correspondence to assessor, appraiser and adversary; telephone conference with adversary; file stipulations of settlement.

Total Hours: 6.1 @ \$125 per hour

Total Amount Due: **\$762.50**

LAW OFFICES OF GARY J. CUCCHIARA, LLC
30 Park Avenue, Lyndhurst, New Jersey 07071
Office (201) 939-9333 ~ Fax (201) 939-9336
Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenvil, New Jersey 07847
Email: cucchiaralaw@gmail.com

INVOICE DATE: July 15, 2016

INVOICE NO.: W16-110

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

SERVICES RENDERED FOR THE MONTH OF JUNE 2016

6/1	0.1	Review correspondence from adversary.
6/2	0.3	Telephone conference with assessor; correspondence to adversary.
6/3	1.4	Review correspondence and documents from adversary and file; correspondence to assessor; review file and notes; telephone conference with adversary.
6/6	0.1	Review correspondence from adversary and file.
6/8	0.5	Review correspondence from court and adversary; review file; correspondence to court and adversary.
6/9	1.2	Review file documents and notes; telephone conference with borough attorney; preparation of memo to same.
6/13	0.4	Review correspondence and documents from adversary; correspondence to same.
6/21	0.8	Review correspondence and documents from borough attorney and file.
6/22	0.5	Review file documents and notes; correspondence to borough attorney.

Total Hours: 5.5 @ \$125 per hour

Total Amount Due: **\$687.50**

LAW OFFICES OF GARY J. CUCCHIARA, LLC

30 Park Avenue, Lyndhurst, New Jersey 07071

Office (201) 939-9333 ~ Fax (201) 939-9336

Email: cucchiaralaw@gmail.com

~

Glen Gardner and Kenil Offices: (908) 617-5172 Fax: (908) 617-5218

605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421

469 Route 46 West, Kenil, New Jersey 07847

July 15, 2016

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

Attached please find an invoice for services rendered for the month of June 2016.

Thank you.

Very truly yours,

Gary J. Cucchiara, Esq.

GJC:gnc

Gary J. Cucchiara, Esq.

attachment

LAW OFFICES OF GARY J. CUCCHIARA, LLC

30 Park Avenue, Lyndhurst, New Jersey 07071

Office (201) 939-9333 ~ Fax (201) 939-9336

Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218

605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421

469 Route 46 West, Kenvil, New Jersey 07847

Email: cucchiara law@gmail.com

INVOICE DATE: January 20, 2016

INVOICE NO.: W15-220

Borough of Wallington

Civic Center

24 Union Boulevard

Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

SERVICES RENDERED FOR THE MONTH OF DECEMBER 2015

12/7 0.7 Review correspondence from adversary and file; telephone conference with adversary; correspondence to assessor and appraiser.

Total Hours: 0.7 @ \$125 per hour

Total Amount Due: **\$87.50**

LAW OFFICES OF GARY J. CUCCHIARA, LLC
30 Park Avenue, Lyndhurst, New Jersey 07071
Office (201) 939-9333 ~ Fax (201) 939-9336
Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenvil, New Jersey 07847
Email: cucchiaralaw@gmail.com

January 20, 2016

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

Attached please find an invoice for services rendered for the month of December 2015.

Thank you.

Very truly yours,

Gary J. Cucchiara, Esq.

Gary J. Cucchiara, Esq.

GJC:gnc

attachment

LAW OFFICES OF GARY J. CUCCHIARA, LLC
30 Park Avenue, Lyndhurst, New Jersey 07071
Office (201) 939-9333 ~ Fax (201) 939-9336
Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenvil, New Jersey 07847
Email: cucchiaralaw@gmail.com

INVOICE DATE: January 15, 2016

INVOICE NO.: W15-132

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

SERVICES RENDERED FOR THE MONTH OF AUGUST 2015

8/11	0.7	Review correspondence from appraiser and file documents; correspondence to appraiser
8/12	0.5	Review file and correspondence from assessor; correspondence to adversary; telephone conference with adversary; correspondence to appraiser
8/13	0.3	Review correspondence from adversary and file; correspondence to adversary, assessor and appraiser

Total Hours: 1.5 @ \$125 per hour

Total Amount Due: **\$187.50**

LAW OFFICES OF GARY J. CUCCHIARA, LLC
30 Park Avenue, Lyndhurst, New Jersey 07071
Office (201) 939-9333 ~ Fax (201) 939-9336
Glen Gardner and Kenil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenil, New Jersey 07847
Email: cucchiara law@gmail.com

January 15, 2016

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

Attached please find an invoice for services rendered for the month of August 2015.

Thank you.

Very truly yours,

Gary J. Cucchiara, Esq.

Gary J. Cucchiara, Esq.

GJC:gnc

attachment

LAW OFFICES OF GARY J. CUCCHIARA, LLC
30 Park Avenue, Lyndhurst, New Jersey 07071
Office (201) 939-9333 ~ Fax (201) 939-9336
Glen Gardner and Kenil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenil, New Jersey 07847
Email: cucchiara-law@gmail.com

INVOICE DATE: January 15, 2016

INVOICE NO.: W15-151

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

SERVICES RENDERED FOR THE MONTH OF SEPTEMBER 2015

9/4	0.5	Review correspondence from assessor and appraiser, and file; correspondence to assessor and appraiser.
9/5	0.3	Review file; telephone conference with adversary.
9/8	0.7	Review correspondence from appraiser and assessor; review files; correspondence to appraiser and assessor; telephone conference with adversary.
9/11	0.5	Telephone conference with adversary; review file.
9/14	2.5	Review file and notes; appearance in Tax Court for trial call.
9/28	0.9	Conference with adversary; review settlement proposal from adversary and file; correspondence to assessor and appraiser.

Total Hours: 5.4 @ \$125 per hour

Total Amount Due: **\$675.00**

LAW OFFICES OF GARY J. CUCCHIARA, LLC

30 Park Avenue, Lyndhurst, New Jersey 07071

Office (201) 939-9333 ~ Fax (201) 939-9336

Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218

605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421

469 Route 46 West, Kenvil, New Jersey 07847

Email: cucchiaralaw@gmail.com

January 15, 2016

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

Attached please find an invoice for services rendered for the month of September 2015.

Thank you.

Very truly yours,

Gary J. Cucchiara, Esq.

GJC:gnc

Gary J. Cucchiara, Esq.

attachment

LAW OFFICES OF GARY J. CUCCHIARA, LLC

30 Park Avenue, Lyndhurst, New Jersey 07071

Office (201) 939-9333 ~ Fax (201) 939-9336

Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218

605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421

469 Route 46 West, Kenvil, New Jersey 07847

Email: cucchiaralaw@gmail.com

INVOICE DATE: January 20, 2016

INVOICE NO.: W15-196

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

SERVICES RENDERED FOR THE MONTH OF NOVEMBER 2015

11/12 1.0	Review file; appearance in court for trial calendar call
11/16 0.5	Telephone conference with adversary; review correspondence and documents from adversary.
11/25 0.7	Review correspondence and documents from adversary; correspondence to assessor and appraiser.

Total Hours: 2.2 @ \$125 per hour

Total Amount Due: **\$275.00**

LAW OFFICES OF GARY J. CUCCHIARA, LLC
30 Park Avenue, Lyndhurst, New Jersey 07071
Office (201) 939-9333 ~ Fax (201) 939-9336
Glen Gardner and Kenil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenil, New Jersey 07847
Email: cucchiaralaw@gmail.com

January 20, 2016

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

Attached please find an invoice for services rendered for the month of November 2015.

Thank you.

Very truly yours,

Gary J. Cucchiara, Esq.

Gary J. Cucchiara, Esq.

GJC:gnc

attachment

LAW OFFICES OF GARY J. CUCCHIARA, LLC
30 Park Avenue, Lyndhurst, New Jersey 07071
Office (201) 939-9333 ~ Fax (201) 939-9336
Glen Gardner and Kenil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenil, New Jersey 07847
Email: cucchiaralaw@gmail.com

INVOICE DATE: September 17, 2015

INVOICE NO.: W15-71

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

SERVICES RENDERED FOR THE MONTH OF MAY 2015

5/1	0.6	Review file documents; telephone conference with adversary; correspondence to appraiser.
5/5	0.8	Telephone conferences with adversary and law clerk; correspondence to Court, adversary and client.
5/15	0.3	Review file; correspondence to Assessor and Borough attorney.

Total Hours: 1.7 @ \$125 per hour
Total Amount Due: **\$212.50**

LAW OFFICES OF GARY J. CUCCHIARA, LLC

30 Park Avenue, Lyndhurst, New Jersey 07071

Office (201) 939-9333 ~ Fax (201) 939-9336

Glen Gardner and Kenvil Offices: (908) 617-5172 Fax: (908) 617-5218
605 Woodglen Road, P.O. Box 421, Glen Gardner, New Jersey 08826-0421
469 Route 46 West, Kenvil, New Jersey 07847
Email: cucchiaralaw@gmail.com

September 17, 2015

Borough of Wallington
Civic Center
24 Union Boulevard
Wallington, NJ 07057

Matter No.: WALL28-1: Tax Appeals

Attached please find an invoice for services rendered for the month of May 2015.

Thank you.

Very truly yours,

Gary J. Cucchiara, Esq.

Gary J. Cucchiara, Esq.

GJC:gnc

attachment

McNerney & Associates, Inc.

266 Harristown Road
Suite 301 - PO Box 67
Glen Rock, NJ 07452

Invoice

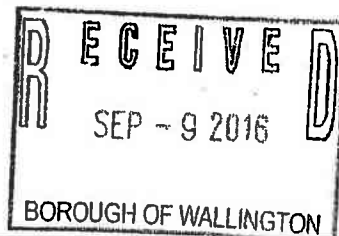
Date	Invoice #
8/22/2016	#2016-470

Bill To
Borough of Wallington Bittiger-Triolo, PC 12 Route 17 North Paramus, New Jersey 07652

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
1	Preparation of Analysis regarding Farmland Dairies vs. Borough of Wallington - 08/04/16 RECEIVED AUG 29 2016	100.00	100.00
		Total	\$100.00

**Bittiger Elias
& Triolo P.C.**
ATTORNEYS AT LAW



JASON L. BITTIGER ¹
PAUL M. ELIAS ²
PRISCILLA J. TRIOLO

MICHAEL C. FEINBERG ³

Of Counsel
SARAH E. ELIAS ¹

¹ ADMITTED IN NEW YORK & NEW JERSEY

REPLY TO NEW JERSEY OFFICE:
12 ROUTE 17 NORTH, SUITE 206
PARAMUS, NEW JERSEY 07652
TEL: (201) 438-7770
FAX: (201) 438-5726
WWW.BITTLAW.COM

PAUL M. ELIAS
PELIAS@BITTLAW.COM

September 6, 2016

Via Regular Mail

Witold Baginski, Clerk
Wallington Municipal Building
24 Union Boulevard
Wallington, New Jersey 07057

Re: Farmland Dairies v. Borough of Wallington
Block 70.01, Lot 1.01; Block 70.01, Lot 4.03; Block 70.01, Lot 4.04
Tax Years 2012-2016

Dear Mr. Baginski:

I have enclosed herewith McNerney & Associates, Inc.'s Invoice No. 2016-470 in the amount of \$100.00. Said invoice is for Mr. McNerney's expert services for the above referenced matters. Kindly process same and forward payment directly to the vendor at your earliest convenience.

As always, do not hesitate to contact me if you have any questions or concerns.

Very truly yours,

A handwritten signature in dark ink, appearing to read "PME" with a stylized flourish at the end.

PAUL M. ELIAS

PME/sas
Enclosure

McNerney & Associates, Inc.

266 Harristown Road
Suite 301 - PO Box 67
Glen Rock, NJ 07452

Invoice

Date	Invoice #
10/3/2016	#2016-558

Bill To
Borough of Wallington Bittiger-Triolo, PC 12 Route 17 North Paramus, New Jersey 07652

PAID
OCT 12 2016

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
1	Updated settlement analysis and preparation of recommendation regarding Farmland Dairies vs. Borough of Wallington - 09/06/16	100.00	100.00
Total			\$100.00

Bittiger Elias & Triolo P.C.

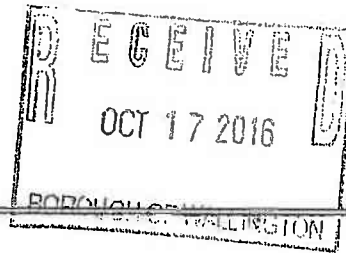
ATTORNEYS AT LAW

JASON L. BITTIGER ³
PAUL M. ELIAS ³
PRISCILLA J. TRIOLO

MICHAEL C. FEINBERG ³

Of Counsel
SARAH E. ELIAS ³

³ ADMITTED IN NEW YORK & NEW JERSEY



REPLY TO NEW JERSEY OFFICE:
12 ROUTE 17 NORTH, SUITE 206
PARAMUS, NEW JERSEY 07652
TEL: (201) 438-7770
FAX: (201) 438-5726
WWW.BITTLAW.COM

PAUL M. ELIAS
PELIAS@BITTLAW.COM

October 13, 2016

Via Regular Mail

Witold Baginski, Clerk
Wallington Municipal Building
24 Union Boulevard
Wallington, New Jersey 07057

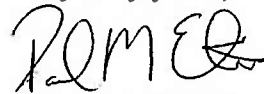
Re: Farmland Dairies v. Borough of Wallington
Block 70.01, Lot 1.01; Block 70.01, Lot 4.03; Block 70.01, Lot 4.04
Tax Years 2012-2016

Dear Mr. Baginski:

I have enclosed herewith McNerney & Associates, Inc.'s Invoice No. 2016-558 in the amount of \$100.00. Said invoice is for Mr. McNerney's expert services for the above referenced matter. Kindly process same and forward payment directly to the vendor at your earliest convenience.

As always, do not hesitate to contact me if you have any questions or concerns.

Very truly yours,


PAUL M. ELIAS

PME/sas
Enclosure

McNerney & Associates, Inc.

266 Harristown Road
Suite 301 - PO Box 67
Glen Rock, NJ 07452

Invoice

Date	Invoice #
9/6/2016	#2016-502

Bill To
Borough of Wallington Bittiger-Triolo, PC 12 Route 17 North Paramus, New Jersey 07652

RECEIVED
SEP 14 2016

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
3	Preparation of settlement analysis, conference with Paul Elias, Esq., conference with Plaintiff's expert regarding Farmland Dairies vs. Borough of Wallington - 08/23/16	100.00	300.00
Total			\$300.00

November 1, 2017

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
10/03/17	0.8	Review lease doc. to prepare for meeting; ph. conf. With secretary from KC- must reschedule;
10 /04/17	0.4	Receipt of email from Walentowitz; ph. conf. W. Salerno;
10/05/17	1.4	Ph. conf w. Judge Friscia - Perez; revise Ordinance ; ph. con w KC
10/10/17	1.3	Receipt review of legal Brief filed by Salerno Esq;
10/11/17	3.6	Attend Court Appearance Judge Friscia; Revise Ordinance prepare letter to planning Board
10/13/17	2.1	Review all doc.; meeting re: lease agreement and utility payments
10/18/17	0.9	Receipt of e-mail from clerk from young; ph. Conf. w/ young; Ph. Conf. Re: Coaches realty;
10/25/17	2.4	Research time planning Board to Act; revise Ordinance;
10/26/17	0.8	Review MOU; ph. Conf

10/27/17	1.9	Prepare notice of Adoption; letter to Court; prepare OPRA response
10/30/17	1.6	Ph. Conf w/Judge Toskos; prepare Order extending immunity from lawsuits; prepare letter to all parties COAH lawsuit
10/31/17	2.3	Ph. Conf. W/Passaic Valley Water; receipt/ review motion for summary judgment

19.5 hrs

August 31, 2017

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
08/01/17	0.8	Review memo and documents from Potash; review letters from Job;
08/08/17	0.4	Receipt review claim on behalf of Warshol;
08/09/17	2.2	Review lawsuit filed by COACHES; ph. conf. from Court re: when will responsive papers be filed; ph. conf. with Melfi re: allegation of complaint; prepare letter;
08/14/17	2.9	Receive of law suit filed by David Warchol; ph. conf. re: COACHES realty lawsuits; ph. conf. with attry. and w. staff attry. League of Municipalities re: donations; prepare letters re: lawsuits;
08/16/17	0.4	Ph. conf. w/ Judge Toskos; ph. conf w/McManus re: conf call for 8/17;
08/17/17	2.6	Case Management Conf. before Judge Toskos re: COAH litigation; prepare letter to Neglia re: vacant land analysis; prepare order as directed by Judge Toskos;
08/18/17	1.7	Review resolution and supporting documents from Rogut; Prepare letter;

08/21/17	3.3	Ph.conf w/Melfi review allegations of lawsuit; review Borough Code provisions cited in lawsuit; begin preparing verified answer to lawsuit; conf call w/ Salerno, Esq and Lamb, Esq agree to adjourn order to show Cause; prepare resolution;
08/22/17	0.7	Receive letter from Lamb; prepare letter re: litigation;
08/23/17	3.6	Receive letter for noon appearance; review verified complaint; appear before Judge Friscia: re: COACH's Realty lawsuit;
08/24/17	2.9	Receipt of vacant land analysis; serve McManus & Bauer; prepare email to Salerno, Esq; receive letter from Steinhagen, Esq; Receipt of proposed resolutions re: Bonds for roadwalk; receive OPRA request; attend meeting
08/30 /17	1.6	Attend meeting; receipt of proposed doc. from Rogut
08/31/17	1.9	Receipt propos. Final doc. from Phenix; prepare response to OPRA Request

October 2, 2017

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
09/05/17	1.9	Ph.conf w. Mrs. Marino from Phoenix Consultants; review final bond doc.; issue ltr. requested by Consultants that there is no material litigation which would have affect repayment; Receipt of Order from Court; Effect Service of Court Order upon all interested persons\
09/13/17	1.6	Research eviction statue; receive address for NOCAR from administrator; prepare letter to vacant;
09/14/17	3.3	Legal research re: law suit; ph. Con. w. Melfi; prepare verified answer and separate deff. to law suit
09/18/17	3.8	Receive legal brief from CJ Estates lawyer; prepare certification of Melfi; prepare letter brief; receive letter from Pacar& Abramson re: NOCAR;
09/19/17	2.8	Meet w. Melfi to review and sign Answer and Certification; hand deliver pleadings to Court for filing;
09/21/17	0.2	Ph.conf. W. KC Landscaping to sept appointment
09/22/17	0.8	prepare draft of response to attorney for NOCAR

09/25/17	2.1	Ph.Conf w. Attorney for ABC; research Wallington zoning code; prepare letter to Hillside Club
09/26/17	2.8	Attend Contract negotiations w Local 560; receive MOA; receive several emails Coaches lawsuit
09/27/17	2.1	Receive email from Salerno Esq.; receive email from Walentowicz Esq.; prepare resolution and ordinance for public meeting;
9/29/17	0.6	Ph. Conf. w KC Landscaping; receive emails re: law suit

December 1, 2017

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
11/01/17	1.4	Receipt review motion for Summary judgment filed by Walentowicz and all supporting papers; serve copy of Court Order on all interested parties' COAH law suit;
11/02/17	0.7	Ph. Conf. w Passaic Valley water; prepare letter to Passaic Valley; review letter from Job;
11/03/17	2.2	Meeting w. Fontana and Siek re: outstanding lien checks ; ph.conf. with Salerno re: consent to reschedule CMC; ph. conf. with . Court;
11/06/17	1.8	Receive review proposed resolution and bond ordinance; ph. Conf. Re: redevelopment study; meeting re: lease;
11/14/17	1.7	Receive multiple resolutions and ordinances from Rogut; receive notice to take deposition of Melfi
11/15/17	3.4	prepare requests for qualifications for 17 professional; prepare public notice for posting on website
11/16/17	0.8	Receipt demand for docs. to Melfi; receipt demand for docs to Rys; receipt of Notice to take depositions of Melfi and Rys;

11/22/17	0.9	Receipt of Notice of Motion filed on behalf of COACHES realty; review Certification of Smith and Salerno Esq.
11/27/17	1.9	Ph conf re: deposition availability; prepare and receive numerous emails all Counsel of Record; research legal brief;
11/28/17	0.9	review various letters from engineers; ph. Conf COAH; research street vacation;
11/29/17	2.9	Ph.conf w/Passaic Valley re: document request; receipt review lengthy documents; ph. conf w/ representative re: document explanation; review reply Brief filed by CJ Estates;
11/30/17	3.1	Prepare ordinance; attend oral argument;

21.7 hrs

December 29, 2017

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
12/01/17	0.8	Prepare notices for newspapers;
12/04/17	0.4	Receipt of order re: Coaches law suit; ph. Conf. W Atty;
12/13/17	1.6	Review all PSE&G & watter bills ; prepare proposed demand letter re: 125 River Drive; receive comments frm administrator;
12/14/17	1.8	Prepare Resolutions for public meeting;
12//15/17	0.9	Research Re: land vacation;
12/19/17	2.8	Prepare resolutions re: reorg. meeting; review letter re: law suit
12/29/17	2.6	Attend meeting revise Resolutions;

10.9 hrs

RICHARD S. CEDZIDLO

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177 PATERSON AVENUE
P.O. BOX 3127
WALLINGTON, NEW JERSEY 07057

(973) 472-1133
FAX: (973) 472-1135

January 3, 2017

Mr. Witold Baginski
Borough Clerk/Administrator
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
12/01/16	0.8	Receipt of Order extending discovery from Judge Bachmann; ph. conf. w/Neglia;
12/02/16	1.6	Receipt of all documents regarding bond ordinance- Alden Street; receipt of new OPRA request; ph. conf. w/attorney;
12/05/16	2.5	Receipt/review of bids on solid waste and recycling; review proposed resolution; ph. conf. w/attorney re: 4H
12/09/16	0.8	Ph. conf. w/ attorney for Donald Nuckel; ph. conf. w/attorneys on Rothman.
12/12/16	2.6	Ph. conf. w/Elias; prepare response to OPRA request; receive phone call and proposal from Sectorsite re: water tank; ph. conf. w/attorneys on Rothman lawsuit
12/13/16	1.9	Revised ordinance; ph. conf. on Rothman lawsuit.

12/14/16	3.8	Ph. confs. w/Koller, Esq and Leon, Esq (9 times); prepare Resolutions
12/15/16	2.4	Prepare response to Sectorsite; prepare necessary documents on Rothman lawsuit; receipt/review stipulation from Koller, Esq;
12/19/16	2.7	Ph. conf. w/rep. on EMS Truck; review specifications; prepare contract for purchase of Ambulance; ph. conf. w/attorney for insurance company;
12/20/16	1.7	Ph. conf. w/representative from Seagrave re: Contract changes; receipt of revised contract from Seagrave; ph. conf. w/ Elias, Esq; ph. conf. w/Lamb, Esq;
12/21/16	2.8	Prepare draft of numerous Resolutions for reorganization; prepare Resolution to Governor Christie; ph. conf. w/Elias; Esq
12/27/16	1.4	Receipt of settlement terms from Elias; prepare resolution re: King Aharon; prepare letter to Elias;
12/28/16	2.4	Legal research; revise resolutions; ph. conf. w/rep. from Seagrave; ph. conf. w/ attorney for developer.
12/29/16	0.9	Receive pleading re: Rothman lawsuit; ph. conf. w/attorney for E&O Insurance

RICHARD S. CEDZIDLO

**ATTORNEY AT LAW
177 PATERSON AVENUE
P.O. BOX 3127
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**(973) 472-1133
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April 28, 2017

Mr. Witold Baginski
Borough Clerk/Administrator
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
04/03/17	0.6	Receive notice re: COAH mediation; prepare documents for Elias, Esq;
04/04/17	1.8	Ph conf w various candidates for admn position; review stipulation of settlement - tax appeals;
04/05/17	3.7	Prepare two resolutions; ph.conf. w/five job candidates serve revised vacant land analysis upon Mcmanus;
04/06/17	1.4	Prepare e-mails to job candidates; research re: code;

04/07/17	2.9	Prepare Affidavit and meet w/Custodian for signature; prepare letter to Court; ph. conf. w/expert Receive letter from Steinhagen, Esq. (ph.conf. w/expert)
04/10/17	4.4	Receive confirming email re: interview (attend interviews for Borough admin.); receipt of new pleading re: Nuckel v Wallington; ph. conf w/ ex-Mayor does he want to intervene ; ph. conf w/ Juzemski RE COAH mediation;
04/11/17	2.6	Attend COAH mediation at Bergen County Justice Center; ph. conf. w/developer; receipt of letter re: OPRA lawsuit
04/12/17	1.9	Ph. conf. w/Herlinsky; send memo to sillscummins; review limitation of property as requested by mediator
04/18/17	3.2	Meeting with Melfi and attorney for Jim Nuckle; phone conf. with John Lamb, esq; prepare pleading Re: law suit; sent doc. to COAH mediator
04/19/17	2.2	Prepare resolutions; and legal research;
04/21/17	2.6	Receipt review of brief to judge Contillo; receipt of memo from State of NJ; research recent " Rice" notice decision
04/24/17	3.7	Prepare RFQ for Library Architect; prepare notice for web site; phone conference with Kafafin; receive and sign consent order; prepare "Rice" notice
04/25/17	1.9	Receipt of order entered by Judge Contilo; meeting with defendant to review and sign certification;
04/28/17	0.8	Receive memo re: COAH; reserch re: Bord Admin.; ph. con. w/Herlmsky, Esq
	33.7 hrs	

May 31, 2017

Mr. Witold Baginski
Borough Clerk/Administrator
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
05/01/17	0.9	Revise resolution; prepare memo re: COAH litigation;
05/02/17	2.4	Meeting w Kafafian, Esq re: OPRA request; review ordinance re: admn.; prepare letter
05/05/17	1.4	Prepare RICE notice; conference re: admn. position
05/08/17	2.4	Attend special meeting; prepare resolution; receive OPRA request; meeting with chief to locate responsive documents;
05/09.17	1.6	Prepare response to OPRA request; research changes to ordinances
05/10/17	2.8	Receipt of letter and law suit from Budin, Esq filed against Borough planner; research change to ordinance; prepare change to ordinance;
05/11/17	1.9	Meeting w. former Mayor; revise certification; submit certification to court;

05/12/17	0.8	Research re: salary ordinance; prepare OPRA response;
05/15/17	1.7	Research re: public hearings; finalize LOI; phone conference re: law suit before Contillo; research doc. for auditors;
05/16/17	3.9	Attend hearing before judge Contillo; ph. conf. w. tax assessor and two lawyers re: title issue (3x); receipt of filed Master Deed; ph. conf. w attorney for Phillips; meeting with police re: Grievances;
05/17/17	2.8	Prepare RICE Notice; prepare ordinance; prepare resolutions; ph.conf. w. Neglia re: title issue; ph. conf. w. lawyers re: title issue;
5/22/17	0.8	Receipt of several e-mails from Kafafian;
5/24/17	0.9	Ph. conf w/Covelli - coverage denied for Phillips; review 3 orders to Contillo - prepare letter of objection;
5/25/17	0.7	Receipt of Kafafian letter to Contillo; ph.conf
5/31/17	1.8	Receipt/review proposed; Agreement from Fontana; research documents from submission to Coah Mediator

26.8 hrs

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June 30, 2017

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
06/01/17	0.7	Ph. conf and email from Denise of Judge Toskos ; ph. conf w/expert;
06/12/17	0.6	Msg from Di Palmari re: continue negotiations; ph. conf. re: lawsuit;
06/13/17	0.7	Ph.conf. w/Bauers re: Coah; ph.conf w/expert; receipt of email;
06/15/17	0.7	Receipt of msg from Mc Manus; ph conf w/Lamb, Esq and email access for wet lands determination;
06/20/17	3.6	Attend conf. with Judge Toskos re : COAH litigation; prepare order and submit to court; ph. conf. re: Latex and with att. for Developer

06/21/17	0.5	Review legal brief of plaintiff
06/22/17	3.9	Attend hearing before judge Contillo; research re: resolution and ordinance for next public hearing; receipt review of lawsuit; receive letter from Hillside Club;
06/23/17	1.6	Receive orders entered by Contillo; receipt of resolution requested by Bergen Police, draft resolution
06/27/17	2.8	Prepare resolutions re: Latex property; ph.conf w/Lamb, Esq
06/28/17	2.5	Prepare resolutions for public meeting;
06/29/17	1.9	Serve Order granting immunity; prepare several resolutions; receipt review resolution letter;

19.5

RICHARD S. CEDZIDLO

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January 31, 2017

Mr. Witold Baginski
Borough Clerk/Administrator
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
01/02/17	0.9	Receive e-mail from Seagrave; research re: table appointments
01/04/17	1.7	Receipt/review of Resolution of award; bid tabulation sheets and low bid package re: Anderson Avenue improvements;
01/06/17	0.8	Ph. conf. w/Crifasi; ph. conf. w/Purcell, Esq-league attorney; ph. conf. w/Villano
01/ 09 /17	2.7	Legal research re: appointments and holdovers; receive Court notices re: settlement conference and trial notice re: Rothman; receive letter from attorney for Rothman; prepare e-mail to Koller, Esq; prepare Contract

01/10/17	2.9	Meeting re: shared services; ph. conf. w/League re: advertising;
01/12/17	1.9	Receive letter from Koller, Esq; receive notice from Court; receipt/review of partial road way vacation/sub-division documents
01/17/17	1.8	Ph. conf. w/Koller, Esq; prepare letter to Court re: settlement; ph. conf. w/Lamb, Esq
01/18/17	1.7	Review proposed stipulation of settlement; contact Koller, Esq re: objection to form; contact attorney for insurance company
01/20/17	2.4	Review Law re: selecting civil service candidate; review Coah lawsuit and prepare letter to Elias, Esq with Court opinion: send research to chief
01/27/17	3.8	Receive courtesy copy of Complaint and Order to Show Cause filed by Nuckle (75 pages); prepare letter to Todd Leon, Esq: receipt of settlement docs
01/30/17	2.7	Attend meeting; receive OSC entered by Judge Contillo; prepare letter to Koller, Esq requesting release
01/31/17	3.8	Legal research of OPRA to respond to lawsuit; prepare resolution requested by Bittiger

27.1 Hrs

RICHARD S. CEDZIDLO

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177 PATERSON AVENUE
P.O. BOX 3127
WALLINGTON, NEW JERSEY 07057

(973) 472-1133
FAX: (973) 472-1135

February 28, 2017

Mr. Witold Baginski
Borough Clerk/Administrator
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
02/01/17	1.9	Receipt of numerous letters and settlement documents from Koller, Esq and Leon, Esq; review subpoena from Methfessel
02/02/17	2.6	Prepare responsive pleading re: lawsuit;
02/03/17	1.4	Review Riverview Settlement; prepare Resolution
02/09/17	0.8	Receive cor. from Leon, Esq; ph. conf. w/Methfessel & Werbel, Esqs; receipt /review subpoena

February 28, 2017

Page 2

02/13/17	2.4	Finalize Verified Answer and Affidavit of Baginski; prepare letter to Court and to Kafafian, Esq; ph. conf. w/Lamb, Esq re: financial impact study; ph. conf. re: Rothman lawsuit; OPRA legal research re: e-mails sent from personal computer.
02/14/17	0.9	Lengthy conv. w/Lamb, Esq re: proposed development; ph. conf. re: engineering report; ph. conf. re: posting of job availability
02/15/17	2.6	Ph. conf. w/league of Municipalities (3 x); draft ad for Administrator position; prepare e-mail to league; received contract from league and sign and forward check in payment; received e-mail from Bittiger Elias & Triolo; receipt of new lawsuit from Nuckel re: Farmland tax appeal
02/16/17	1.9	Ph. conf. w/ Carter, Esq; prepare letter to Crifasi; prepare letter to Leon, Esq; receipt of proposed settlement
02/21/17	2.9	Attend negotiations w/Teamsters Local Union No. 560; receive document from Koller, Esq; receive from Leon, Esq; prepare letter to Koller, Esq; receive response re: administrator ;research stree vacation
02/22/17	3.6	Research re: ordinances; prepare draft of ordinance
02/23/17	2.8	Prepare resolution re: Court Administrator; research VFW agreements; receive document from Koller, Esq; receive letter Leon, Esq; receive cor. from Bittiger Elias & Triolo;
02/24/17	2.4	Research re: ordinance; prepare proposed no parking on grass; prepare letter to Leon. Esq; prepare letter to Melfi.
02/27/17	2.7	Receipt/review contract from Neglia re: Road Improvement Contracts; review contract website-suggest changes; ph. conf. w/developer; ph. conf. w/Koller,Esq

28.9Hrs

August 1, 2017

Mr. Witold Baginski
Borough Clerk
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
07/05/17	0.5	Prepare notice to cancel regular meeting and to schedule joint meeting; prepare letter;
07/10/17	2.6	Review proposed contract VTS; prepare Rider to contract; prepare Resolution
07/11/17	2.4	Review documents and plan to be submitted re: COAH lawsuit; ph.conf. w/tax appeal attys re: Farmland Dairies;
07/12/17	1.8	Prepare responses to lawsuit; review Opra requests;
07/13/17	2.9	Prepare several Resolutions;
07/19/17	3.1	Prepare resolution for public meeting; review proposed ordinance review law re: rescinding votes
07/20/17	2.2	Review ABC REGS; review COAH order; prepare letter; receive letters from Job;
07/31/17	3.6	Receipt review proposed settlement from Kafafian Esq.; prepare letter to Kafafian; receipt review contract between Farmland Dairy and DOKA; receipt letter from expert

19.1

RICHARD S. CEDZIDLO

ATTORNEY AT LAW
177 PATERSON AVENUE
P.O. BOX 3127
WALLINGTON, NEW JERSEY 07057

(973) 472-1133
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January 3, 2017

Mr. Witold Baginski
Borough Clerk/Administrator
Civic Center
24 Union Boulevard
Wallington, NJ 07057

RE: Borough of Wallington

Details of Services Rendered:

Date	Hours	
12/01/16	0.8	Receipt of Order extending discovery from Judge Bachmann; ph. conf. w/Neglia;
12/02/16	1.6	Receipt of all documents regarding bond ordinance- Alden Street; receipt of new OPRA request; ph. conf. w/attorney;
12/05/16	2.5	Receipt/review of bids on solid waste and recycling; review proposed resolution; ph. conf. w/attorney re: 4H
12/09/16	0.8	Ph. conf. w/ attorney for Donald Nuckel; ph. conf. w/attorneys on Rothman.
12/12/16	2.6	Ph. conf. w/Elias; prepare response to OPRA request; receive phone call and proposal from Sectorsite re: water tank; ph. conf. w/attorneys on Rothman lawsuit
12/13/16	1.9	Revised ordinance; ph. conf. on Rothman lawsuit.

January 3, 2017
Page 2

12/14/16	3.8	Ph. confs. w/Koller, Esq and Leon, Esq (9 times); prepare Resolutions
12/15/16	2.4	Prepare response to Sectorsite; prepare necessary documents on Rothman lawsuit; receipt/review stipulation from Koller, Esq;
12/19/16	2.7	Ph. conf. w/rep. on EMS Truck; review specifications; prepare contract for purchase of Ambulance; ph. conf. w/attorney for insurance company;
12/20/16	1.7	Ph. conf. w/representative from Seagrave re: Contract changes; receipt of revised contract from Seagrave; ph. conf. w/ Elias, Esq; ph. conf. w/Lamb, Esq;
12/21/16	2.8	Prepare draft of numerous Resolutions for reorganization; prepare Resolution to Governor Christie; ph. conf. w/Elias; Esq
12/27/16	1.4	Receipt of settlement terms from Elias; prepare resolution re: King Aharon; prepare letter to Elias;
12/28/16	2.4	Legal research; revise resolutions; ph. conf. w/rep. from Seagrave; ph. conf. w/ attorney for developer.
12/29/16	0.9	Receive pleading re: Rothman lawsuit; ph. conf. w/attorney for E&O Insurance

Bittiger Elias & Triolo P.C.

ATTORNEYS AT LAW

JASON L. BITTIGER [^]
PAUL M. ELIAS [^]
PRISCILLA J. TRIOLO

MICHAEL C. FEINBERG [^]

Of Counsel
SARAH E. ELIAS [^]

[^] ADMITTED IN NEW YORK & NEW JERSEY

REPLY TO NEW JERSEY OFFICE:

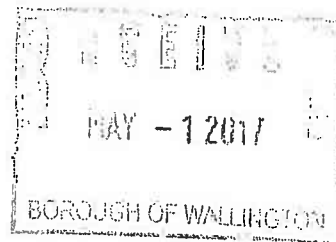
12 ROUTE 17 NORTH, SUITE 206
PARAMUS, NEW JERSEY 07652
TEL: (201) 438-7770
FAX: (201) 438-5726
WWW.BITTLAW.COM

PAUL M. ELIAS
PELIAS@BITTLAW.COM

April 26, 2017

Via Regular Mail

Witold Baginski, Clerk
Wallington Municipal Building
24 Union Boulevard
Wallington, New Jersey 07057



Re: Carl Finneran v. Wallington
Block 57, Lot 2; 21 Currie Avenue
Block 60.02, Lot 3; 53 Wadsworth Street
Block 56, Lot 4; Wadsworth Street & Currie Avenue
Docket Nos.: 006928-2012; 000066-2013; 006631-2014; 001005-2015; 002127-2016

Dear Mr. Baginski:

I have enclosed herewith McNerney & Associates, Inc.'s Invoice No. 2017-210 in the amount of \$250.00. Said invoice is for Mr. McNerney's expert services for the above referenced matters. Kindly process same and forward payment directly to the vendor at your earliest convenience.

As always, do not hesitate to contact me if you have any questions or concerns.

Very truly yours,

A handwritten signature in dark ink, appearing to read "PME" followed by a stylized flourish or "E".

PAUL M. ELIAS

PME/sas
Enclosure

McNerney & Associates, Inc.

266 Harristown Road
Suite 301 - PO Box 67
Glen Rock, NJ 07452

Invoice

Date	Invoice #
4/20/2017	#2017-210

Bill To
Borough of Wallington Bittiger-Triolo, PC 12 Route 17 North Paramus, New Jersey 07652

RECEIVED
APR 25 2017

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
2.5	Review of discovery and conference with Borough Attorney regarding Finneran vs. Borough of Wallington - 03/28/17	100.00	250.00
		Total	\$250.00

McNerney & Associates, Inc.

266 Harristown Road
Suite 301 - PO Box 67
Glen Rock, NJ 07452

Invoice

Date	Invoice #
2/28/2017	#2017-104

Bill To
Borough of Wallington Bittiger-Triolo, PC 12 Route 17 North Paramus, New Jersey 07652

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
1	Appraisal Fee, Carl Finneran, Block 57 Lot 2, Block 60.02 Lot 3 & Block 56 Lot 4, 21 Curie Avenue & 53 Wadsworth Street, Wallington, New Jersey - Tax Years 2012-2015	3,500.00	3,500.00
		Total	\$3,500.00

McNerney & Associates, Inc.

266 Harristown Road
Suite 301 - PO Box 67
Glen Rock, NJ 07452

Invoice

Date	Invoice #
8/7/2017	#2017-368

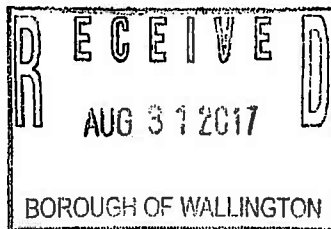
Bill To
Borough of Wallington Bittiger-Triolo, PC 12 Route 17 North Paramus, New Jersey 07652

P.O. No.	Terms	Project

Quantity	Description	Rate	Amount
1	Appraisal Fee, Jasontown II Associates, 11-21 Midland Avenue, Block 71 Lot 3, Wallington, New Jersey	9,500.00	9,500.00
		Total	\$9,500.00

RECEIVED
AUG 28 2017

**Bittiger Elias
& Triolo P.C.**
ATTORNEYS AT LAW



JASON L. BITTIGER ¹
PAUL M. ELIAS ¹
PRISCILLA J. TRIOLO

MICHAEL C. FEINBERG ¹

Of Counsel
SARAH E. ELIAS ¹

¹ ADMITTED IN NEW YORK & NEW JERSEY

REPLY TO NEW JERSEY OFFICE:
12 ROUTE 17 NORTH, SUITE 206
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TEL: (201) 438-7770
FAX: (201) 438-5726
WWW.BITTLAW.COM

PAUL M. ELIAS
PELIAS@BITTLAW.COM

August 28, 2017

Via Regular Mail

Witold Baginski, Clerk
Wallington Municipal Building
24 Union Boulevard
Wallington, New Jersey 07057

Re: Jasontown II Associates v. Borough of Wallington
Block 71, Lot 3; 11-21 Midland Avenue
Docket No.: 009362-2014; 004383-2015; 005126-2016

Dear Mr Baginski:

I have enclosed herewith McNerney & Associates, Inc.'s Invoice No. 2017-368 in the amount of \$9,500.00. Said invoice is for Mr. McNerney's expert services for the above referenced matters. Kindly process same and forward payment directly to the vendor at your earliest convenience.

As always, do not hesitate to contact me if you have any questions or concerns.

Very truly yours,

A handwritten signature in dark ink, appearing to read "PME" followed by a stylized flourish.

PAUL M. ELIAS

PME/sas
Enclosure