

Date 2/19/25

Division Chief

Director

Contract No.

Charge Appropriation:

Heat Channel

Voucher Properly executed and complete.
Submit for Approval.

Country Dwellers

* All board fees must be completed.

To Charge Multiple Budgets:

[illegible][illegible]

cial Young

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

February 04, 2025
Invoice No. 21463

Client Number: 4793 County of Hudson
Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson
For Services Rendered from 8/1/2024 Through 1/31/2025.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
1/6/2025	MRT	Attendance at case management conference call with court.	0.60	\$90.00
1/7/2025	SJ	Receipt and review courts notification re matter marked Stayed until defendant Wellpath bankruptcy remains open.	0.20	\$18.00
1/7/2025	MRT	Receipt and review of court order re order to stay case.	0.20	\$30.00
1/9/2025	RPJ	Review of file re: litigation strategy	0.30	\$27.00
1/23/2025	SJ	Receipt and review courts notification re Substitution of Attorney for Defendant Nicholas Manfredi.	0.20	\$18.00
Billable Hours / Fees:			1.50	\$183.00

Timekeeper Summary

Timekeeper MRT worked 0.80 hours at \$150.00 per hour, totaling \$120.00.

Timekeeper SJ worked 0.40 hours at \$90.00 per hour, totaling \$36.00.

Timekeeper RPJ worked 0.30 hours at \$90.00 per hour, totaling \$27.00.

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

2/4/2025
Page: 2

Current Invoice Summary

Current Fees:	\$183.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	<u>\$183.00</u>

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

$$\frac{1}{15/25}$$

Division Chief

Director

Order No. _____ Contract No. _____

Prices/Footings Verified

Budget Account No.

Year Charged

Cost Code

**Voucher Properly executed and complete.
Submit for Approval.**

Date _____
County Executive _____

* All bold items must be completed.

To George Muller's Budgets:

[illegible][illegible]

State Vouchers

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

December 30, 2024

Invoice No. 21207

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 7/1/2024 Through 12/27/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/2/2024	RPJ	Receipt/Review court notice re: status conference minute entries	0.20	\$18.00
12/16/2024	MRT	Attendance at court telephone case management conference.	0.30	\$45.00
12/17/2024	SJ	Receipt and review courts notification re conference call scheduled for 1/6/25.	0.20	\$18.00
12/17/2024	MRT	Receipt and review of notice from court re case management conference.	0.20	\$30.00
12/18/2024	LJH	Review documents batestamped P000654-944 in preparation to index the same	1.90	\$285.00
12/18/2024	LJH	Index documents batestamped 654-944	1.90	\$285.00
12/19/2024	LJH	Review and evaluation documents batestamped P000480-653 in preparation to index the same	1.60	\$240.00
12/19/2024	LJH	Index documents batestamped P000480-653 in preparation of discovery index	1.60	\$240.00
12/20/2024	LJH	Review and analyze documents batestamped 1826-1544, 653-480, 468-465, 313-312, 249-226, 83-74, and 24-1 in preparation to index the same	1.60	\$240.00
12/20/2024	LJH	Index documents batestamped 1826-1544, 653-480, 468-465, 313-312, 249-226, 83-74, and 24-1	1.60	\$240.00
12/23/2024	LJH	Review and index documents batestamped 2172 and 1829-1826 and medical records batestamped 1-31	1.20	\$180.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

12/30/2024

Page: 2

12/26/2024	LJH	Review and evaluate Plaintiff's Medical Records Batestamped 30 to 88 in preparation to index the same.	1.20	\$180.00
12/26/2024	LJH	Index Plaintiff's Medical Records Batestamped 30 to 88	1.20	\$180.00
Billable Hours / Fees:			14.70	\$2,181.00

Timekeeper Summary

Timekeeper MRT worked 0.50 hours at \$150.00 per hour, totaling \$75.00.

Timekeeper LJH worked 13.80 hours at \$150.00 per hour, totaling \$2,070.00.

Timekeeper SJ worked 0.20 hours at \$90.00 per hour, totaling \$18.00.

Timekeeper RPJ worked 0.20 hours at \$90.00 per hour, totaling \$18.00.

Current Invoice Summary

Current Fees:	\$2,181.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$2,181.00

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



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, SE 440
ISELN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
11-12-24	INV # 20920		
To			
11-26-24			
	IFC # 2024-041		
	Total Payment Due	\$843.	00

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim, and that the same is a reasonable one.

Claimant Signature

Title

CRC#26099

12/14/21

1000 JOURNAL OF CLIMATE

Director

Contract No.

gs Verified

Charge Appropriation:

Budget Account No.

Year Charged

Cost Code

**Voucher Properly executed and complete.
Submit for Approval.**

County Executive

* All bold items must be completed.

To Charge Multiple Budgets:

Yr. Cho	Account	Cl. of Code	Amount
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[illegible]

total Voucher

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440

Iselin, NJ 08830

Telephone: 7327094182

Fax: 7327911555

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

December 03, 2024

Invoice No. 20920

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 7/1/2024 Through 11/30/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/12/2024	MRT	Receipt and review of notice from court re mediation order for Judge Falk.	0.20	\$30.00
11/13/2024	LJI	Review <u>discovery</u> received from Plaintiff in preparation to index the same	1.30	\$195.00
11/13/2024	LJI	Index documents received from Plaintiff	1.30	\$195.00
11/13/2024	RPJ	Receipt/Review court notice re: mediation order appointing Judge Falk/ <u>scheduling</u> mediation for 2/11/25	0.40	\$36.00
11/19/2024	MRT	Receipt and review of notice of filing from court.	0.20	\$30.00
11/19/2024	MRT	Receipt and review of defendant Well Path notice of bankruptcy proceeding and stay request.	0.40	\$60.00
11/19/2024	RPJ	Receipt/Review court notice re: suggestion of bankruptcy	0.20	\$18.00
11/21/2024	MRT	Review of case file and analyze for <u>litigation</u> strategy and case status.	0.40	\$60.00
11/22/2024	MRT	Receipt of notice of filing from court.	0.20	\$30.00
11/22/2024	MRT	Receipt of plaintiff correspondence and attachments to court re status of matter after co-defendant bankruptcy filing.	0.50	\$75.00
11/25/2024	MRT	Correspondence from counsel for co-defendant to Judge Falk re request for stay.	0.20	\$30.00
11/25/2024	RPJ	Review of litigation file re: discovery plan	0.40	\$36.00
11/26/2024	RPJ	Receipt/Review court notice re: telephonic emc	0.20	\$18.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

12/3/2024
Page: 2

11/26/2024 MRT

Correspondence from court re telephone
conference following bankruptcy notice.

0.20 \$30.00

Billable Hours / Fees: 6.10 \$843.00

Timekeeper Summary

Timekeeper MRT worked 2.30 hours at \$150.00 per hour, totaling \$345.00.

Timekeeper RPI worked 1.20 hours at \$90.00 per hour, totaling \$108.00.

Timekeeper LJI worked 2.60 hours at \$150.00 per hour, totaling \$390.00.

Current Invoice Summary

Current Fees:	\$843.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$843.00

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

11/19/24

Division Chief

Director

Order No. _____ Contract No. _____

Prices/Footings Verified

Charge Appropriation:

Budget Account No.

Year Charged

Cost Code

Voucher Properly executed and complete.
Submit for Approval.

County Executive

²⁴ All bold items must be completed.

To Charge Multiple Budgets:

[illegible][illegible]

Order Voucher.

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440

Iselin, NJ 08830

Telephone: 7327094182

Fax: 7327911555

November 04, 2024

Invoice No. 20601

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 6/1/2024 Through 10/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/1/2024	SJ	receipt and review courts notification re defendant wellpath reply brief re MTD	0.20	\$18.00
10/1/2024	SJ	call to chambers re settlement conference on 10/2	0.20	\$18.00
10/3/2024	MRT	Receipt and review of notice from court re settlement.	0.20	\$30.00
10/4/2024	SJ	receipt and review courts notification re min entry for settlement conference held on 10/2	0.20	\$18.00
10/4/2024	SJ	receipt and review courts notification re order re settlement between plaintiff & wellpath NOT settled	0.20	\$18.00
10/14/2024	SJ	email correspondence re mediation	0.20	\$18.00
10/15/2024	SJ	receipt and review courts notification re SOA for defendant Manfredi	0.20	\$18.00
10/16/2024	LJH	Draft Notice of Appearance in preparation of the same	0.40	\$60.00
10/16/2024	LJH	Review documents produced in discovery	0.70	\$105.00
10/17/2024	MRT	Receipt and review of correspondence from plaintiff counsel re mediator list.	0.30	\$45.00
10/17/2024	MRT	Receipt and review of correspondence from co-defendant counsel re mediation.	0.30	\$45.00
10/17/2024	MRT	Response from T. Newman re co-defendant Edwards on mediation.	0.20	\$30.00
10/18/2024	LJH	Review and Index discovery received from Plaintiff	1.10	\$165.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

11/4/2024

Page: 2

10/22/2024	MRT	Correspondence from co-defendant counsel re status of settlement.	0.20	\$30.00
10/22/2024	MRT	Response from D. Lamporello re status of settlement discussions.	0.20	\$30.00
10/23/2024	MRT	Correspondence from co-defendant counsel to plaintiff re mediator.	0.20	\$30.00
10/24/2024	MRT	Receipt of email from plaintiff counsel to Judge Falk re mediation.	0.20	\$30.00
10/24/2024	MRT	Receipt and review of correspondence and attachments from plaintiff counsel to Judge Falk re mediation.	0.50	\$75.00
10/28/2024	LJH	Reviewing Discovery and received from Plaintiff in preparation to index discovery	0.90	\$135.00
10/28/2024	LJH	Indexing documents received from plaintiff in preparation of the same	0.90	\$135.00

Billable Hours / Fees:	7.50	\$1,053.00
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Timekeeper Summary

Timekeeper MRT worked 2.30 hours at \$150.00 per hour, totaling \$345.00.

Timekeeper LJH worked 4.00 hours at \$150.00 per hour, totaling \$600.00.

Timekeeper SJ worked 1.20 hours at \$90.00 per hour, totaling \$108.00.

Current Invoice Summary

Current Fees:	\$1,053.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$1,053.00

Thank You for Letting Us Serve You.

Payment Due Upon Receipt.



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, SE 440
ISELIN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
9/17/24	ROMAN, EUNICE INV. # 20312		
	IFC # 2024-041		
Total Payment Due		\$227	75

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and just claim, and that the amount charged is a reasonable one.

[Redacted Signature]

Claimant Signature

CRC # 26099

Title

10/16/24

Division Chief

Director

Contract No.

Charge Appropriation:

Year Charged

**Voucher Properly executed and complete.
Submit for Approval.**

County Executive

* All bold items must be completed.

To Charge Multiple Budgets:

Yr.	Chg	Account	Cst Code	Amount
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Diet Voucher

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

October 01, 2024

Invoice No. 20312

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 6/1/2024 Through 9/30/2024.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
9/17/2024	MRT	Correspondence from plaintiff counsel re update to court.	0.30	\$45.00
9/17/2024	MRT	Receipt and review of clerk notice filed by court.	0.20	\$30.00
9/17/2024	MRT	Receipt and review of plaintiff notice to court re status update.	0.30	\$45.00
9/17/2024	SJ	receipt and review courts notification re plaintiff's opposition to defendant Ronald Edwards MTD	0.20	\$18.00
9/17/2024	SJ	receipt and review courts notification re plaintiff's opposition to defendant Wellpath MTD	0.20	\$18.00
Billable Hours / Fees:			1.20	\$156.00

Timekeeper Summary

Timekeeper SJ worked 0.40 hours at \$90.00 per hour, totaling \$36.00.

Timekeeper MRT worked 0.80 hours at \$150.00 per hour, totaling \$120.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
6/27/2024	B/W Photocopies	\$0.65	

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

10/1/2024
Page: 2

6/27/2024	B/W Photocopies	\$0.65
6/27/2024	B/W Photocopies	\$56.85
6/27/2024	B/W Photocopies	\$1.30
7/11/2024	B/W Photocopies	\$1.30
8/7/2024	B/W Photocopies	\$5.40
8/7/2024	B/W Photocopies	\$3.20
8/7/2024	B/W Photocopies	\$2.40
Total Costs		\$71.75

Current Invoice Summary

Current Fees:	\$156.00
Advanced Costs:	\$71.75
TOTAL AMOUNT DUE:	\$227.75

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



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, SE 440
ISELN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
8.7.24	INV. # 20126		
To			
8.26.24			
	IEC# 2024-041		
	Total Payment Due	\$822.	95

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.

Claimant Signature

Title

CLC# 26099

Division Chief

Director

Order No. _____ Contract No. _____

Prices/Footings Verified

Charge Appropriation:

Budget Account No.

Year Charged

Cost Code

**Voucher Properly executed and complete.
Submit for Approval.**

County Executive

* All bold items must be completed.

To Charge Multiple Budgets:

[illegible][illegible]

Gift Voucher.

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

September 06, 2024

Invoice No. 20126

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 5/1/2024 Through 8/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/7/2024	SJ	draft, review and edit answer to second amended complaint	0.80	\$72.00
8/7/2024	SJ	receipt and review courts notification re answer to amended complaint	0.20	\$18.00
8/9/2024	SJ	receipt and review courts notification re defendant wellpath MTD plaintiff's second amended complaint	0.20	\$18.00
8/9/2024	MRT	Revise and finalize substitution of attorney,	0.30	\$45.00
8/9/2024	MRT	Review of second amended complaint, exhibits, and answer.	1.40	\$210.00
8/9/2024	MRT	Receipt and review of Wellpath motion to dismiss.	1.20	\$180.00
8/9/2024	SJ	receipt and review courts notification re defendant Nicholas Manfredi answer to plaintiff's second amended complaint	0.20	\$18.00
8/12/2024	SJ	receipt and review courts notification re defendant county of Hudson answer to plaintiff's second amended complaint	0.20	\$18.00
8/12/2024	RPJ	Receipt/Review court notice re: Motion to Dismiss Plaintiff's Second Complaint	0.80	\$72.00
8/23/2024	SJ	receipt and review courts notification re plaintiff's request to carry motion to 9/16	0.20	\$18.00
8/23/2024	MRT	Receipt and review of correspondence from plaintiff to court re adjournment.	0.30	\$45.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

9/6/2024
Page: 2

8/23/2024	MRT	Receipt and review of notice from court re motion dates.	0.20	\$30.00
8/26/2024	SJ	receipt and review courts notification re MTD returnable 9/16	0.20	\$18.00
Billable Hours / Fees:			<u>6.20</u>	<u>\$762.00</u>

Timekeeper Summary

Timekeeper SJ worked 2.00 hours at \$90.00 per hour, totaling \$180.00.

Timekeeper RPJ worked 0.80 hours at \$90.00 per hour, totaling \$72.00.

Timekeeper MRT worked 3.40 hours at \$150.00 per hour, totaling \$510.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
6/27/2024	B/W Photocopies	\$0.65	
6/27/2024	B/W Photocopies	\$0.65	
6/27/2024	B/W Photocopies	\$56.85	
6/27/2024	B/W Photocopies	\$1.30	
7/11/2024	B/W Photocopies	\$1.30	
Total Costs		<u>\$60.75</u>	

Current Invoice Summary

Current Fees:	\$762.00
Advanced Costs:	\$60.75
TOTAL AMOUNT DUE:	<u>\$822.75</u>

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



E- _____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, SE 440
ISELIN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
7.8.24	INV # 19881		
10			
7.24.24			
	IFC # 2024-041		
	Total Payment Due	\$1,410.	00

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.

Claimant Signature

Title

CR# 26099

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

August 06, 2024

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Invoice No. 19881

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 4/1/2024 Through 7/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
7/8/2024	EPR	letter from plaintiff's counsel	0.40	\$60.00
7/8/2024	EPR	draft letter to court	0.70	\$105.00
7/8/2024	EPR	check status of case	0.60	\$90.00
7/8/2024	EPR	letter from co-defendant	0.80	\$120.00
7/8/2024	EPR	court notice	0.30	\$45.00
7/8/2024	EPR	letter to court	0.30	\$45.00
7/9/2024	SJ	receipt and review courts notification re issued raised in the DE 82 will be addressed on 7/10 via telephone conference	0.20	\$18.00
7/9/2024	EPR	court order	0.30	\$45.00
7/9/2024	EPR	prepare for conference	0.80	\$120.00
7/10/2024	EPR	conference with court/adversaries	1.30	\$195.00
7/10/2024	EPR	memo to file	0.50	\$75.00
7/10/2024	EPR	Receipt/review Amended Scheduling Order	0.40	\$60.00
7/11/2024	SJ	receipt and review courts notification re amended scheduling order	0.20	\$18.00
7/11/2024	SJ	receipt and review courts notification re minute entry for proceeding	0.20	\$18.00
7/11/2024	SJ	receipt and review courts notification re joint letter in preparation for status conference	0.20	\$18.00
7/11/2024	EPR	Scheduling Order	0.40	\$60.00
7/11/2024	EPR	email to/from Hatfield	0.80	\$120.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

8/6/2024
Page: 2

7/19/2024	SJ	receipt and review courts notification re tex order in personal settlement 10/2	0.20	\$18.00
7/22/2024	EPR	court order	0.20	\$30.00
7/24/2024	EPR	letter from co-defendant	0.40	\$60.00
7/24/2024	EPR	review status	0.60	\$90.00
Billable Hours / Fees:			9.80	\$1,410.00

Timekeeper Summary

Timekeeper SJ worked 1.00 hours at \$90.00 per hour, totaling \$90.00.

Timekeeper EPR worked 8.80 hours at \$150.00 per hour, totaling \$1,320.00.

Current Invoice Summary

Current Fees:	\$1,410.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$1,410.00

Thank You for Letting Us Serve You.

Payment Due Upon Receipt.

8/1/8

Division Chief

Director

Contract No.

Prices/Footings Verified

Charge Appropriation:

Budget Account No.

Year Charged

Cost Code

**Voucher Properly executed and complete.
Submit for Approval.**

County Executive

* All bold items must be completed.

To Charge Multiple Budgets:

Yr. Chg	Account	Cost Code	Amount
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[illegible]

Gift Voucher

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

July 02, 2024

Invoice No. 19556

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 3/1/2024 Through 6/30/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
5/28/2024	EPR	court notice/court order	0.30	\$45.00
5/28/2024	EPR	Review status	0.40	\$60.00
5/28/2024	EPR	letter from adversary	0.30	\$45.00
5/29/2024	EPR	court notice	0.20	\$30.00
6/25/2024	SJ	receipt and review courts notification re plaintiff advising court they filed 2nd amended complaint	0.20	\$18.00
6/25/2024	SJ	receipt and review courts notification re amended complaint	0.20	\$18.00
6/25/2024	EPR	status	0.30	\$45.00
6/25/2024	EPR	Receipt/review Amended Complaint	2.80	\$420.00
6/25/2024	EPR	letter from adversary	0.40	\$60.00
6/26/2024	SJ	receipt and review courts notification re co-defendant beltan request to address due dates for responsive pleadings	0.20	\$18.00
6/26/2024	SJ	receipt and review courts notification re plaintiffs request for CMC & possible settlement	0.20	\$18.00
6/26/2024	EPR	court notice	0.20	\$30.00
6/27/2024	SJ	receipt and review courts notification re CMC 7/10	0.20	\$18.00
6/27/2024	EPR	court notice	0.20	\$30.00
6/27/2024	EPR	letter from co-defendant	0.40	\$60.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

7/2/2024
Page: 2

6/27/2024	EPR	letter to court	0.40	\$60.00
Billable Hours / Fees:			6.90	\$975.00

Timekeeper Summary

Timekeeper SJ worked 1.00 hours at \$90.00 per hour, totaling \$90.00.

Timekeeper EPR worked 5.90 hours at \$150.00 per hour, totaling \$885.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
6/6/2024	Request for Records from Pacer	\$40.00	
Total Costs		\$40.00	

Current Invoice Summary

Current Fees:	\$975.00
Advanced Costs:	\$40.00
TOTAL AMOUNT DUE:	\$1,015.00

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

HUDSON COUNTY INSURANCE FUND COMMISSION

RESOLUTION NO: 2024-041

MEETING DATE: June 27, 2024

**AMENDING RESOLUTION #2023-065
AUTHORIZING PROFESSIONAL SERVICE AGREEMENT
WITH
RAINONE COUGHLIN MINCHELLO
(\$40,000.00)**

COMMISSIONERS: Fuller **OFFERED AND** Kopcer
MOVED ADOPTION OF THE FOLLOWING RESOLUTION:

WHEREAS, this Commission, by way of Resolution #2023-065 authorized a Professional Service Agreement with Rainone Coughlin Minchello upon the recommendation of the County Counsel to provide independent representation in the defense of a litigated matter under the caption Eunice Roman v. County of Hudson; and

WHEREAS, the IFC, pursuant to the terms of the New Jersey Local Unit Pay-to-Play Law, N.J.S.A. 19:44A-20.4 et. seq. which ensures a fair and open, competitive process, appointed the firm of Florio Kenny Raval, LLP, at an hourly rate of One-Hundred-Fifty (\$150.00) Dollars and this amendment stems from this process;

WHEREAS, the prior Resolution in this matter authorized the expenditure of a sum not to exceed **FORTY THOUSAND (\$40,000.00) DOLLARS**; and

WHEREAS, after undertaking the defense of Alejandro Mendez, it has been determined that more time, effort, and professional expertise will be required to adequately defend this action than was originally anticipated; and

WHEREAS, the County Counsel has indicated that this contract amount needs to be amended to provide for the cost of representation and allowable expenses by an additional sum of **FORTY THOUSAND (\$40,000.00) DOLLARS** and;

WHEREAS, Cheryl G. Fuller, Director of Finance and Administration has certified that funds are available for this purpose through the Hudson County Law Department.

NOW, THEREFORE BE IT RESOLVED, by the Hudson County Insurance Fund Commission, that:

1. The aforesaid recitals are incorporated herein as if fully set forth at length.
2. The Department of Law is hereby authorized to enter into an extension of the above referenced contract with said firm pursuant to law in the above-referenced matter, and the Office of Risk Management is hereby authorized to oversee the payment of an additional **FORTY THOUSAND (\$40,000.00) DOLLARS** and the total amount of the authorized expenditure shall not exceed **EIGHTY THOUSAND (\$80,000.00) DOLLARS**, to Rainone Coughlin Minchello, 555 U.S. Highway One South, Suite 440, Iselin, New Jersey 08830.
3. This Resolution shall take effect immediately.

CERTIFICATION

<u>RECORD OF VOTES</u>	<u>AYES</u>	<u>NAYS</u>	<u>ABSENT</u>
David B. Drumeler, Chairperson	✓		
Cheryl G. Fuller, Commissioner	✓		
Kenneth Kopacz, Commissioner	✓		

I, John Metro, certify that at a meeting of the Hudson County Insurance Fund Commission held on this 27th day of June, 2024, the aforesaid Resolution was duly adopted. 3 members voted in the affirmative and 0 members voted in the negative.

Secretary

Dated Prepared:

6/27/2024

INSURANCE FUND COMMISSION
RESOLUTION FACT SHEET

DEPARTMENT: Office of the County Counsel

DIVISION: Law

SOURCE: Alberico De Pierro, Deputy County Counsel

CONTRACTOR/PROGRAM TITLE: Rainone Coughlin Minchello - RE: Eunice Roman v. County of Hudson

AMENDMENT: X

AMOUNT: for an additional \$40,000.00, not to
exceed \$80,000.00

RATIONALE FOR CONTRACTING/ACTION:

**Amending Professional Services Contract
with Rainone Coughlin Minchello**

MEMORANDUM

TO: INSURANCE FUND COMMISSION

FROM: ALBERICO DE PIERRO, DEPUTY COUNTY COUNSEL

DATE: JUNE 25, 2024

RE: EUNICE ROMAN v. COUNTY OF HUDSON
(Rainone Coughlin Minchello/Amending Professional Services
Resolution)

The law firm of Rainone Coughlin Minchello is defending Alejandro Mendez, in connection with the above matter.

In order for the firm to continue to properly represent Alejandro Mendez they have been required to perform extensive discovery and other work that goes along with these employment cases where theories of fee shifting are involved.

As their first authorization has now expired it is necessary in order to continue to provide the defense to increase the amount of money available to Rainone Coughlin Minchello in this case.

Therefore, it requested that the Insurance Fund Commission pass a Resolution increasing the cap on their fees so that their legal fees can be paid.

s/Alberico De Pierro

Alberico De Pierro
Deputy County Counsel

AD:dmp



Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US Highway One South, SE 440
ISELN, NJ 08830

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.

Title

CR #26099

6/19/24

Division Chief

Director

Contract No.

Prices/Footings Verified

Charge Appropriation:

Budget Account No.

Year Charged

Cost Code

**Voucher Properly executed and complete.
Submit for Approval.**

County Executive

All bids must be completed.

To Charge Multiple Budgets:

[illegible][illegible]

Oil Vouches.

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

June 05, 2024

Invoice No. 19337

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson
Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson
For Services Rendered from 2/1/2024 Through 5/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
4/29/2024	EPR	letter from adversary	0.30	\$45.00
4/29/2024	EPR	Digest medical records & medical research	3.40	\$510.00
5/6/2024	EPR	court notice	0.20	\$30.00
5/6/2024	EPR	receipt/review court order	0.20	\$30.00
5/7/2024	EPR	court notice	0.20	\$30.00
5/7/2024	EPR	status	0.20	\$30.00
5/7/2024	EPR	Receipt/review of documents from County of Hudson in support of motion	1.70	\$255.00
5/8/2024	SJ	Receipt and review court notice re: SOA for Nicholas Manfredi	0.20	\$18.00
5/8/2024	SJ	Receipt and review court notice re: order dismissing Sean O'Leary & Dennis Sandrock	0.20	\$18.00
5/15/2024	EPR	status review	0.60	\$90.00
5/15/2024	EPR	Review motions/opinions	1.80	\$270.00
5/17/2024	SJ	Receipt and review of notice from court re plaintiffs request for extension	0.20	\$18.00
5/17/2024	EPR	prepare for conference	0.40	\$60.00
5/24/2024	SJ	Receipt and review of notice from court re letter granting plaintiffs request for 30 day extension	0.20	\$18.00
5/24/2024	SJ	Receipt and review of notice from court re plaintiffs request for 30 day extension to amend complaint	0.20	\$18.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

6/5/2024
Page: 2

5/30/2024	SJ	Receipt and review of notice from court re text order advising next telephone conference call on 7/10 at 2pm	0.20	\$18.00
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Billable Hours / Fees:	10.20	\$1,458.00
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Timekeeper Summary

Timekeeper EPR worked 9.00 hours at \$150.00 per hour, totaling \$1,350.00.

Timekeeper SJ worked 1.20 hours at \$90.00 per hour, totaling \$108.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
4/23/2024	B/W Photocopies	\$46.15	
4/23/2024	B/W Photocopies	\$46.15	
4/23/2024	B/W Photocopies	\$0.60	
4/24/2024	B/W Photocopies	\$13.65	
5/3/2024	Overnight Delivery Charge	\$45.97	
5/7/2024	B/W Photocopies	\$0.30	
5/7/2024	B/W Photocopies	\$6.90	
5/7/2024	B/W Photocopies	\$2.10	
Total Costs		\$161.82	

Current Invoice Summary

Current Fees:	\$1,458.00
Advanced Costs:	\$161.82
TOTAL AMOUNT DUE:	\$1,619.82

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



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, STE 440
ISELIN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
3-25-24	ROMAN, EUNICE INV # 18990		
To			
4-29-24			
	IFC # 2023-065		
	Total Payment Due	\$3,633.	60

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.

Claimant Signature

Title

CRC# 26099

Date 5/15/24

Division Chief

Director

Order No. _____ Contract No. _____

Prices/Footings Verified

Budget Account No.

Year Charged

Cost Code

Voucher Properly executed and complete,
Submit for Approval.

County Executive

All bold items must be completed.

Ys. Chu	Account	Cost Code	Amount
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[illegible]

Order Voucher.

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

May 03, 2024

Invoice No. 18990

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 1/1/2024 Through 4/30/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
3/25/2024	EPR	multiple emails from co-defendants	0.40	\$60.00
3/25/2024	EPR	emails to co-defendants re: conference	0.40	\$60.00
3/25/2024	EPR	Review motion to dismiss	1.80	\$270.00
3/27/2024	EPR	status	0.20	\$30.00
3/27/2024	EPR	prepare for conference	0.80	\$120.00
3/28/2024	EPR	phone conference	0.70	\$105.00
3/28/2024	EPR	memo to file	0.50	\$75.00
4/5/2024	EPR	Review/revise motion to dismiss	0.60	\$90.00
4/5/2024	SJ	Receipt and review court notice re NOM for Leave to file out of time	0.20	\$18.00
4/5/2024	SJ	Receipt and review court notice re Defendant Beltran MTD Plaintiffs First Amended Complaint	0.20	\$18.00
4/8/2024	EPR	court notice	0.20	\$30.00
4/8/2024	EPR	status review	0.40	\$60.00
4/8/2024	EPR	receipt/review motion to dismiss by co-defendant	2.10	\$315.00
4/11/2024	SJ	Receipt and review court notice re Order granting our Motion for leave to file judgment on the pleadings	0.20	\$18.00
4/12/2024	LJH	Revise 12(c) motion to dismiss in preparation of the same	1.70	\$255.00
4/12/2024	EPR	court notice	0.20	\$30.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

5/3/2024
Page: 2

4/13/2024	LJH	Continue to revise Motion to dismiss pursuant to 12c in preparation of the same	2.20	\$330.00
4/13/2024	LJH	Draft Notice of motion, proposed order, and cover letter in preparation of 12c motion (judgment on the pleadings)	0.70	\$105.00
4/15/2024	LJH	Review and revise notice of motion and proposed order in preparation to file the motion for judgment on the pleadings	0.60	\$90.00
4/15/2024	SJ	Review and edit NOM to file judgment on the pleadings	0.50	\$45.00
4/15/2024	SJ	Review and edit proposed order re motion to file judgment on the pleadings	0.40	\$36.00
4/15/2024	SJ	review and edit brief in support of motion to file judgment on the pleadings	0.80	\$72.00
4/15/2024	SJ	Compile exhibits for certification	0.40	\$36.00
4/15/2024	SJ	Draft proof of service	0.30	\$27.00
4/15/2024	EPR	Review Motion to Dismiss and Brief	0.80	\$120.00
4/17/2024	EPR	Review status of motions	0.60	\$90.00
4/19/2024	LJH	Review and revise motion for judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12c and attached documents in preparation to file the same.	1.20	\$180.00
4/19/2024	SJ	Receipt and review court notice re plaintiffs request to carry our MTD to June 2 2024	0.20	\$18.00
4/22/2024	SJ	review and finalize cover letter enclosing motion to file judgment on the pleadings	0.20	\$18.00
4/22/2024	LJH	review and revise motion for judgment on the pleadings in preparation to file the same	0.30	\$45.00
4/22/2024	SJ	revise and finalize proof of service	0.20	\$18.00
4/22/2024	SJ	review brief and add TOC/TOA in support of motion to file judgment on the pleadings	0.50	\$45.00
4/22/2024	SJ	Review and finalize proposed order re motion to file judgment on the pleadings	0.20	\$18.00
4/22/2024	LJH	Review and finalize brief in support of motion for judgment on the pleadings in preparation to file the same	0.60	\$90.00
4/22/2024	SJ	Review and finalize NOM to file judgment on the pleadings	0.20	\$18.00
4/22/2024	EPR	court notice	0.20	\$30.00
4/22/2024	EPR	letter from adversary	0.20	\$30.00
4/23/2024	SJ	Prepare/finalized & efile motion for the judge	0.20	\$18.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

5/3/2024
Page: 3

4/23/2024	EPR	court notice	0.20	\$30.00
4/23/2024	SJ	Receipt and review court notice re Order dismissing defendants Hudson county, wellpath, ronald edwards and officer beltran	0.20	\$18.00
4/23/2024	SJ	Receipt and review court notice re Opinion related to MTD	0.20	\$18.00
4/24/2024	SJ	Receipt and Review of court notice re: plaintiff response due date	0.20	\$18.00
4/24/2024	SJ	Receipt and review court notice re Notice of dismissal as to the named defendants	0.20	\$18.00
4/24/2024	EPR	Receipt/review Judicial Opinion	1.30	\$195.00
4/24/2024	EPR	court notice	0.20	\$30.00
4/24/2024	EPR	review pleadings.	0.60	\$90.00
4/25/2024	LJH	Review and analyze opinion regarding motion to dismiss from District Court	0.90	\$135.00
4/29/2024	EPR	letter from adversary	0.30	\$45.00

Billable Hours / Fees: 26.40 \$3,630.00

Timekeeper Summary

Timekeeper LJH worked 8.20 hours at \$150.00 per hour, totaling \$1,230.00.

Timekeeper SJ worked 5.50 hours at \$90.00 per hour, totaling \$495.00.

Timekeeper EPR worked 12.70 hours at \$150.00 per hour, totaling \$1,905.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
4/4/2024	B/W Photocopies	\$0.60	
4/5/2024	B/W Photocopies	\$3.00	
Total Costs		\$3.60	

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

5/3/2024
Page: 4

Current Invoice Summary

Current Fees:	\$3,630.00
Advanced Costs:	\$3.60
TOTAL AMOUNT DUE:	<u>\$3,633.60</u>

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



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, STE 440
ISELIN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
2-7-24	ROMAN, EUNICE INV # 18489		
TO			
2-29-24			
	IEC # 2023-065		
	Total Payment Due	\$1,773.	90

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.

[Redacted Signature]

Claimant Signature

Title

CRC# 26099

6/15/24
Date

DIVISION CHIEF

Director

Contract No. _____

Verified

iation;

at No.

mit for Approval.

County Executive

must be completed.

To Charge Multiple Budgets:

[illegible][illegible]

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

March 07, 2024

Invoice No. 18489

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 1/1/2024 Through 2/29/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
2/7/2024	EPR	prepare for conference	0.80	\$120.00
2/7/2024	EPR	conference	0.60	\$90.00
2/7/2024	EPR	memo to file	0.50	\$75.00
2/7/2024	EPR	court notice	0.30	\$45.00
2/9/2024	EPR	email from co-defendant	0.30	\$45.00
2/9/2024	EPR	email from adversary	0.20	\$30.00
2/14/2024	EPR	email from co-defendant	0.30	\$45.00
2/14/2024	EPR	court notice	0.20	\$30.00
2/14/2024	EPR	status review	0.80	\$120.00
2/14/2024	EPR	Prep for conference	1.20	\$180.00
2/15/2024	EPR	Phone conference	0.70	\$105.00
2/15/2024	EPR	memo to file	0.60	\$90.00
2/20/2024	EPR	emails from co-defendants	0.30	\$45.00
2/21/2024	EPR	email from co-defendant	0.30	\$45.00
2/22/2024	EPR	emails from co-defendants	0.40	\$60.00
2/26/2024	LJH	review and analyze plaintiff transcript in preparation to draft immunity motion	1.40	\$210.00
2/29/2024	LJH	Research qualified immunity regarding [REDACTED] [REDACTED] in preparation to draft motion to dismiss	0.80	\$120.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

3/7/2024
Page: 2

2/29/2024	LJH	Research qualified immunity under motion to dismiss on pleadings in preparation to draft motion to dismiss	2.10	\$315.00
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Billable Hours / Fees:	11.80	\$1,770.00
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Timekeeper Summary

Timekeeper EPR worked 7.50 hours at \$150.00 per hour, totaling \$1,125.00.

Timekeeper LJH worked 4.30 hours at \$150.00 per hour, totaling \$645.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
2/1/2024	B/W Photocopies	\$0.90	
2/26/2024	B/W Photocopies	\$3.00	
Total Costs		\$3.90	

Current Invoice Summary

Current Fees:	\$1,770.00
Advanced Costs:	\$3.90
TOTAL AMOUNT DUE:	\$1,773.90

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



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, SE 440
ISELN. NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
2-26-24	ROMAN, EUNICE		
To			
3-28-24			
	IFC # 2023-065		
	Total Payment Due	\$8,296.	50

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.

Claimant Signature

Title

CR# 26099

4/17/24

Division Chief

Director

Order No. _____ Contract No. _____

Prices/Bookings Verified

Charge Appropriation:

Budget Account No.

Year Charged

Cost Code

**Voucher Properly executed and complete,
Submit for Approval.**

Date _____ County Executive _____

* All bold items must be completed.

To C arge Multiple Budgets:

Yr. Chg	Account	Cust Code	Amount
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[illegible]

Gift Voucher

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

April 04, 2024

Invoice No. 18750

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 1/1/2024 Through 3/31/2024.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
2/26/2024	EPR	email to co-defendant	0.30	\$45.00
2/26/2024	EPR	email from co-defendant with attachment	0.40	\$60.00
2/26/2024	EPR	conference call	0.60	\$90.00
2/26/2024	EPR	memo to file	0.40	\$60.00
2/26/2024	EPR	Prepare for conference	0.50	\$75.00
2/26/2024	EPR	Review pleadings	1.00	\$150.00
2/26/2024	EPR	Review discovery	1.70	\$255.00
3/4/2024	LJH	Research plaintiffs claim on deliberate indifference to medical need	1.40	\$210.00
3/4/2024	LJH	Research plaintiffs claim on Deliberate indifference to jail safety	1.40	\$210.00
3/4/2024	LJH	research qualified immunity claims regarding [REDACTED]	1.40	\$210.00
3/4/2024	EPR	court notice	0.20	\$30.00
3/4/2024	EPR	status	0.60	\$90.00
3/5/2024	LJH	additional research plaintiffs claims on deliberate indifference to medical need and deliberate indifference to jail safety claims in preparation to draft motion to dismiss	0.60	\$90.00
3/5/2024	LJH	legal research on plaintiffs claims of negligent management of detainee in preparation to draft motion to dismiss	1.20	\$180.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

4/4/2024
Page: 2

3/5/2024	LJH	legal research on plaintiffs claims of negligent training and supervision of jail staff in preparation to draft motion to dismiss	1.20	\$180.00
3/5/2024	LJH	legal research of tolling of Tort Claims Act Complaints in preparation to draft motion to dismiss	0.80	\$120.00
3/6/2024	LJH	Additional research regarding tolling of notice of Tort Claims in preparation of motion to dismiss	2.20	\$330.00
3/6/2024	LJH	research and review of Survival act and wrongful death act caselaw in preparation to draft motion to dismiss	0.20	\$30.00
3/6/2024	LJH	Outline arguments/points in preparation to draft motion to dismiss	1.30	\$195.00
3/6/2024	LJH	Draft Standard of Review section of motion to dismiss in preparation of motion to dismiss	1.30	\$195.00
3/6/2024	LJH	Draft point one of motion to dismiss regarding counts one and two of plaintiffs complaint	1.70	\$255.00
3/8/2024	LJH	Additional research and review of caselaw concerning TCA discovery rule and tolling of TCA claim notice in preparation to draft section of motion to dismiss on the same	0.80	\$120.00
3/8/2024	LJH	additional review of the Plaintiffs' complaint in preparation to draft section of Motion to dismiss regarding TCA discovery rule tolling of serving notice of tort claim	0.60	\$90.00
3/8/2024	LJH	draft section on TCA discovery rule and tolling of time to serve notice of tort claim in preparation of motion to dismiss	2.20	\$330.00
3/12/2024	MW	receipt/review of ecourt notice re: telephonic status conference on May 30, 2024	0.20	\$18.00
3/12/2024	EPR	status	0.40	\$60.00
3/12/2024	EPR	court notice	0.20	\$30.00
3/14/2024	EPR	status	0.30	\$45.00
3/18/2024	EPR	Receipt/review plaintiff's responses to discovery demands (voluminous)	1.80	\$270.00
3/18/2024	EPR	status	0.60	\$90.00
3/18/2024	EPR	email from co-defendant with attachment	0.40	\$60.00
3/18/2024	EPR	Receipt/review Report of In Custody Suicide Death	2.00	\$300.00
3/19/2024	EPR	review discovery responses	1.10	\$165.00
3/20/2024	LJH	Research of Deliberate indifference caselaw under eighth amendment	0.80	\$120.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

4/4/2024
Page: 3

3/20/2024	LJH	Research deliberate indifference to prisoner suicide in preparation to continue drafting section on matter	0.90	\$135.00
3/20/2024	LJH	Research prison official deliberate indifference to safety in preparation of to draft section on same	0.70	\$105.00
3/20/2024	LJH	Drafting section on prison official deliberate indifference to suicide, medical need, and safety in preparation of motion to dismiss	1.20	\$180.00
3/21/2024	LJH	Additional Drafting of section arguing for dismissal of counts regarding deliberate indifference to medical need, safety, and suicide.	1.30	\$195.00
3/21/2024	LJH	Legal research of tort claims act statute and caselaw regarding tolling of accrual of claim.	1.10	\$165.00
3/21/2024	LJH	additional drafting of section arguing that plaintiffs complaint is barred by TCA	1.20	\$180.00
3/22/2024	LJH	Research TCA statute and case law regarding qualified immunity for corrections officers	0.60	\$90.00
3/22/2024	LJH	Draft section in support of granting immunity to Plaintiffs' claims	1.60	\$240.00
3/25/2024	LJH	review and revise motion for judgment on the pleadings	2.10	\$315.00
3/25/2024	LJH	Draft and revise preliminary statement in preparation of Motion for judgment on the pleadings	0.70	\$105.00
3/25/2024	LJH	Review NHCCC report reviewing Decedent's suicide in preparation to add facts to the 12(c) motion	0.90	\$135.00
3/26/2024	LJH	Research rules for filing motion for judgment on the pleadings in preparation of the same	0.90	\$135.00
3/26/2024	LJH	Drafting motion for leave regarding Motion for judgment on the pleadings	1.10	\$165.00
3/26/2024	LJH	Draft Statement of Facts regarding Motion for judgment on the pleadings	1.80	\$270.00
3/27/2024	LJH	Continue to draft Statement of Facts regarding Motion for judgment on the pleadings	1.10	\$165.00
3/27/2024	LJH	Revise statement of facts regarding Motion for judgment on the pleadings	1.60	\$240.00
3/27/2024	LJH	Research improper group pleading in preparation to draft section on same regarding 12c motion	1.20	\$180.00
3/27/2024	LJH	Drafting Section on improper group pleading in preparation of 12c motion	0.60	\$90.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

4/4/2024
Page: 4

3/28/2024	LJH	Continue drafting section on improper group pleading in preparation of 12c motion	1.30	\$195.00
3/28/2024	LJH	Revise section on improper group pleading and insert facts from HCCC report to applicable arguments in preparation of 12c motion	1.60	\$240.00
			Billable Hours / Fees:	\$55.30 \$8,283.00

Timekeeper Summary

Timekeeper LJH worked 42.60 hours at \$150.00 per hour, totaling \$6,390.00.

Timekeeper EPR worked 12.50 hours at \$150.00 per hour, totaling \$1,875.00.

Timekeeper MW worked 0.20 hours at \$90.00 per hour, totaling \$18.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
3/5/2024	B/W Photocopies	\$7.50	
3/25/2024	B/W Photocopies	\$5.70	
3/25/2024	B/W Photocopies	\$0.30	
Total Costs		\$13.50	

Current Invoice Summary

Current Fees:	\$8,283.00
Advanced Costs:	\$13.50
TOTAL AMOUNT DUE:	\$8,296.50

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

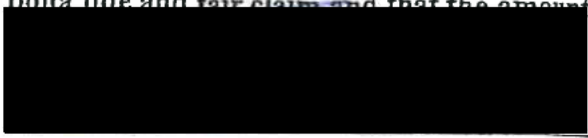


E- _____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSONVendor: RAINONE COUGHLIN MINCHELLOAddress: 555 US HIGHWAY ONE SOUTH, STE 440
ISELIN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
2-7-24	ROMAN, EUNICE INV # 18489		
To			
2-29-24			
	IFC # 2023-065		
	Total Payment Due	\$1,773.	90

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.


Claimant Signature_____
Title

CPC # 26099

3/20/24

1000

Director

Contract No

ied

or:

1

214

5

Submit for Approval.

County Executive

st be completed

Large Multiple Budgets:

[illegible]

Gift Voucher

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440

Iselin, NJ 08830

Telephone: 7327094182

Fax: 7327911555

March 07, 2024

Invoice No. 18489

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 1/1/2024 Through 2/29/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
2/7/2024	EPR	prepare for conference	0.80	\$120.00
2/7/2024	EPR	conference	0.60	\$90.00
2/7/2024	EPR	memo to file	0.50	\$75.00
2/7/2024	EPR	court notice	0.30	\$45.00
2/9/2024	EPR	email from co-defendant	0.30	\$45.00
2/9/2024	EPR	email from adversary	0.20	\$30.00
2/14/2024	EPR	email from co-defendant	0.30	\$45.00
2/14/2024	EPR	court notice	0.20	\$30.00
2/14/2024	EPR	status review	0.80	\$120.00
2/14/2024	EPR	Prep for conference	1.20	\$180.00
2/15/2024	EPR	Phone conference	0.70	\$105.00
2/15/2024	EPR	memo to file	0.60	\$90.00
2/20/2024	EPR	emails from co-defendants	0.30	\$45.00
2/21/2024	EPR	email from co-defendant	0.30	\$45.00
2/22/2024	EPR	emails from co-defendants	0.40	\$60.00
2/26/2024	LJH	review and analyze plaintiff transcript in preparation to draft immunity motion	1.40	\$210.00
2/29/2024	LJH	Research qualified immunity regarding suicide of prisoner in preparation to draft motion to dismiss	0.80	\$120.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

3/7/2024
Page: 2

2/29/2024	LJH	Research qualified immunity under motion to dismiss on pleadings in preparation to draft motion to dismiss	2.10	\$315.00
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Billable Hours / Fees:	11.80	\$1,770.00
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Timekeeper Summary

Timekeeper EPR worked 7.50 hours at \$150.00 per hour, totaling \$1,125.00.

Timekeeper LJH worked 4.30 hours at \$150.00 per hour, totaling \$645.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
2/1/2024	B/W Photocopies	\$0.90	
2/26/2024	B/W Photocopies	\$3.00	
Total Costs		\$3.90	

Current Invoice Summary

Current Fees:	\$1,770.00
Advanced Costs:	\$3.90
TOTAL AMOUNT DUE:	\$1,773.90

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



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, STE 440
ISELIN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
1-2-24	ROMAN, EUNICE		
TO	INV. # 18226		
1-30-24			
	IFC # 2023-065		
	Total Payment Due	\$2,941.	30

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim, and that the amount charged is a reasonable one.

Claimant Signature

Title

CR# 26099

2/14/24

Division Chief

Director

Contract No. _____

Charge Appropriation:

Year Charged

Voucher Properly executed and complete.

Submit for Approval.

County Executive

* **All bold items must be completed.**

Yr. Chr	Account	Dr. Code	Amount
1900	1000	1000	1000
1901	1000	1000	1000
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1904	1000	1000	1000
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1985	1000	1000	1000

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Deal Vouchers

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

February 05, 2024

Invoice No. 18226

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 10/1/2023 Through 1/31/2024.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
1/2/2024	EPR	Status review	0.60	\$90.00
1/2/2024	EPR	Review Joint Discovery Plan	0.50	\$75.00
1/2/2024	EPR	Review discovery	1.70	\$255.00
1/2/2024	EPR	Review Motions	2.30	\$345.00
1/2/2024	EPR	Review Case Mgt. Order	0.50	\$75.00
1/5/2024	EPR	review status	0.40	\$60.00
1/11/2024	EPR	Receipt/review medical records	1.60	\$240.00
1/11/2024	EPR	email from co-defendant with attachment	0.60	\$90.00
1/11/2024	EPR	check status	0.40	\$60.00
1/18/2024	EPR	status	0.40	\$60.00
1/18/2024	EPR	Review discovery	1.30	\$195.00
1/18/2024	EPR	Finalize discovery responses	1.60	\$240.00
1/18/2024	EPR	email to adversary with attachment	0.40	\$60.00
1/18/2024	EPR	Review motions by co-defendants	1.60	\$240.00
1/23/2024	EPR	Edit/revise discovery responses	1.30	\$195.00
1/23/2024	EPR	status	0.40	\$60.00
1/30/2024	EPR	status review	0.50	\$75.00
1/30/2024	EPR	Review pleadings	1.20	\$180.00
1/30/2024	EPR	Review discovery	1.60	\$240.00
1/30/2024	EPR	Prepare for conference	0.70	\$105.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

2/5/2024
Page: 2

Billable Hours / Fees: 19.60 \$2,940.00

Timekeeper Summary

Timekeeper EPR worked 19.60 hours at \$150.00 per hour, totaling \$2,940.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
1/30/2024	B/W Photocopies	\$1.30	
Total Costs		\$1.30	

Current Invoice Summary

Current Fees:	\$2,940.00
Advanced Costs:	\$1.30
TOTAL AMOUNT DUE:	\$2,941.30

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



E-_____

THE OFFICE OF THE COUNTY EXECUTIVE
COUNTY OF HUDSON

Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, # 440
ISELIN, NJ 08830

Date of Service Or Delivery	Description	Dollars	Cents
11-27-23	ROMAN, EUNICE		
TO	INV. # 17995		
12-7-23			
	IFC # 2023-065		
	Total Payment Due	\$1,707	00

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount claimed is a reasonable one.

Claimant Signature

Title

CRC # 26099

1/17/84

Division Chief

Director

Contract No.

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Submit for Approval.

County Executive

[illegible]

Gift Voucher

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440

Iselin, NJ 08830

Telephone: 7327094182

Fax: 7327911555

January 09, 2024

Invoice No. 17995

County of Hudson
Office of County Counsel

567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 7/1/2023 Through 12/31/2023.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
11/27/2023	EPR	Review case management order	0.70	\$105.00
11/27/2023	EPR	Review discovery	2.30	\$345.00
11/27/2023	EPR	Review case status	1.90	\$285.00
11/29/2023	EPR	Legal research	1.20	\$180.00
11/29/2023	EPR	case status	0.70	\$105.00
11/29/2023	EPR	memo	0.40	\$60.00
11/29/2023	EPR	Edit/revise discovery demands	1.60	\$240.00
11/29/2023	EPR	letter to adversary with attachment	0.40	\$60.00
12/5/2023	EPR	case status	0.60	\$90.00
12/5/2023	EPR	Review discovery	0.80	\$120.00
12/6/2023	MW	Review of file w/ Attorney re: discovery plan	0.30	\$27.00
12/7/2023	EPR	status	0.60	\$90.00
Billable Hours / Fees:			11.50	\$1,707.00

Timekeeper Summary

Timekeeper EPR worked 11.20 hours at \$150.00 per hour, totaling \$1,680.00.

Timekeeper MW worked 0.30 hours at \$90.00 per hour, totaling \$27.00.

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

1/9/2024
Page: 2

Current Invoice Summary

Current Fees:	\$1,707.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$1,707.00

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

12/13/23

Division Chief

Director

Order No. _____ Contract No. _____

Prices/Footings Verified

Budget Account No.

Year Charged

Cost Code

**Voucher Properly executed and complete.
Submit for Approval.**

County Executive

* All bold items must be completed.

[illegible][illegible]

Total Voucher:

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

December 05, 2023

Invoice No. 17694

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 6/1/2023 Through 11/30/2023.

Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/27/2023	EPR	Prepare and file Rule 26 Disclosures	2.10	\$315.00
10/27/2023	EPR	Status review	1.10	\$165.00
10/27/2023	EPR	Legal research - Rule26 Disclosures	0.90	\$135.00
10/27/2023	EPR	Memo to file	0.40	\$60.00
10/27/2023	EPR	Review discovery demands	1.30	\$195.00
10/27/2023	EPR	email from adversary	0.40	\$60.00
10/30/2023	EPR	Edit/revise Rule 26 Disclosures	1.00	\$150.00
10/30/2023	EPR	Correspondence to all counsel with attachment	0.40	\$60.00
10/30/2023	EPR	Receipt/review - Opposition to motion by Wellpath	1.20	\$180.00
10/30/2023	EPR	Receipt/review Reply brief by Wellpath	1.10	\$165.00
10/31/2023	EPR	Receipt/review of Reply Brief to opposition to dismiss (Beltran)	1.70	\$255.00
10/31/2023	EPR	Case status	0.40	\$60.00
10/31/2023	EPR	Receipt/review Court Order	0.50	\$75.00
11/1/2023	EPR	investigation	0.80	\$120.00
11/6/2023	EPR	Receipt/review Rule 26 Disclosures	0.80	\$120.00
11/6/2023	EPR	status review	0.70	\$105.00
11/6/2023	EPR	Draft discovery demands	4.10	\$615.00
11/7/2023	EPR	email to adversary with attachment	0.50	\$75.00
11/7/2023	EPR	Review Pretrial Scheduling Order	0.60	\$90.00

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

12/5/2023
Page: 2

11/7/2023	EPR	Edit/revise discovery demands	0.70	\$105.00
11/7/2023	EPR	Receipt/review Rule 26 Disclosures - Edwards	0.50	\$75.00
11/7/2023	EPR	Receipt/review Rule 26 Disclosures - Beltran	0.50	\$75.00
11/7/2023	EPR	Receipt/review Rule 26 Disclosures - Hudson County	0.50	\$75.00
11/30/2023	MW	Draft First Notice to Produce to Plaintiff	1.20	\$108.00
11/30/2023	MW	Draft responses to Interrogatories & NTP	2.00	\$180.00
			Billable Hours / Fees:	25.40 \$3,618.00

Timekeeper Summary

Timekeeper EPR worked 22.20 hours at \$150.00 per hour, totaling \$3,330.00.

Timekeeper MW worked 3.20 hours at \$90.00 per hour, totaling \$288.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
10/27/2023	B/W Photocopies	\$3.00	
10/27/2023	B/W Photocopies	\$0.90	
10/30/2023	B/W Photocopies	\$3.00	
10/31/2023	B/W Photocopies	\$3.25	
10/31/2023	B/W Photocopies	\$0.60	
10/31/2023	B/W Photocopies	\$1.30	
11/1/2023	B/W Photocopies	\$0.60	
11/1/2023	B/W Photocopies	\$0.30	
11/1/2023	B/W Photocopies	\$1.20	
11/6/2023	B/W Photocopies	\$1.20	
11/6/2023	B/W Photocopies	\$1.30	
11/6/2023	B/W Photocopies	\$4.20	
11/6/2023	B/W Photocopies	\$4.20	
11/6/2023	B/W Photocopies	\$3.90	
11/7/2023	B/W Photocopies	\$4.20	
11/8/2023	B/W Photocopies	\$1.30	
		Total Costs	\$34.45

Continued On Next Page

Client Number: 4793
Matter Number: 153-0002

12/5/2023
Page: 3

Current Invoice Summary

Current Fees:	\$3,618.00
Advanced Costs:	\$34.45
TOTAL AMOUNT DUE:	<u>\$3,652.45</u>

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

11/14/23

Division Chief

Director

Order No. _____ Contract No. _____

Prices/Footings Verified

Charge Appropriation:

Budget Account No.

Year Charged

Cost Code

Voucher Properly executed and complete.
Submit for Approval.

County Executive

All bold items must be completed.

To Charge Multiple Budgets:

Yr.	Chgs	Account	Cust Code	Amount
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[illegible]

total Voucher

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

November 02, 2023

Invoice No. 17343

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 5/1/2023 Through 10/31/2023.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
9/29/2023	EPR	Receipt/review Plaintiff's memorandum of law in opposition to motion	2.10	\$315.00
9/29/2023	EPR	Receipt/review co-defendant's reply	1.70	\$255.00
9/29/2023	EPR	emails from adversary	0.40	\$60.00
9/29/2023	EPR	correspondence to all counsel	0.40	\$60.00
10/2/2023	EPR	status review	1.60	\$240.00
10/2/2023	EPR	correspondence from court	0.30	\$45.00
10/2/2023	EPR	correspondence from co-defendant	0.40	\$60.00
10/2/2023	EPR	Receipt/review plaintiff's memorandum in opposition (Hudson)	1.90	\$285.00
10/3/2023	EPR	Receipt/review Reply Brief	1.60	\$240.00
10/3/2023	EPR	Receipt/review of Order	0.40	\$60.00
10/12/2023	EPR	email to adversary	0.40	\$60.00
10/12/2023	EPR	Status review of case	1.30	\$195.00
10/12/2023	EPR	email from co-defendant	0.40	\$60.00
10/12/2023	EPR	Receipt/review of draft of discovery plan	0.50	\$75.00
10/16/2023	EPR	Receipt/review court notice	0.20	\$30.00
10/16/2023	EPR	Receipt/review memorandum in opposition to motion to dismiss	2.30	\$345.00
10/17/2023	EPR	status review	1.20	\$180.00
10/17/2023	EPR	prepare for conference	1.10	\$165.00

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Client Number: 4793
Matter Number: 153-0002

11/2/2023
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10/17/2023	EPR	email to adversary	0.40	\$60.00
10/17/2023	EPR	email to adversary	0.40	\$60.00
10/17/2023	EPR	Receipt/review of Final Joint Discovery Plan	0.50	\$75.00
10/18/2023	EPR	Phone conference	1.20	\$180.00
10/18/2023	EPR	memo	0.60	\$90.00
10/18/2023	EPR	Multiple emails from all counsel	0.90	\$135.00
10/19/2023	EPR	email from co-defendant	0.40	\$60.00
10/19/2023	EPR	court notice	0.20	\$30.00
10/25/2023	EPR	Receipt/review Rule 26 Disclosures from plaintiff	1.60	\$240.00
10/25/2023	EPR	email from plaintiff	0.40	\$60.00
10/25/2023	EPR	status of discovery	1.90	\$285.00
10/26/2023	EPR	memo to file	0.50	\$75.00
Billable Hours / Fees:			27.20	\$4,080.00

Timekeeper Summary

Timekeeper EPR worked 27.20 hours at \$150.00 per hour, totaling \$4,080.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
10/3/2023	B/W Photocopies	\$10.40	
10/4/2023	Postage	\$0.63	
10/4/2023	Postage	\$0.63	
10/4/2023	Postage	\$0.63	
10/4/2023	Postage	\$0.63	
10/17/2023	B/W Photocopies	\$0.30	
10/17/2023	B/W Photocopies	\$0.30	
10/17/2023	B/W Photocopies	\$0.60	
10/25/2023	B/W Photocopies	\$3.00	
Total Costs		\$17.12	

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Matter Number: 153-0002

11/2/2023
Page: 3

Current Invoice Summary

Current Fees:	\$4,080.00
Advanced Costs:	\$17.12
TOTAL AMOUNT DUE:	<u>\$4,097.12</u>

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

10/18/23

Division Chief

Director

Contract No. _____

Charge Appropriation:

Year Charged

Voucher Properly executed and complete.
Submit for Approval.

County Executive

* All bold items must be completed.

[illegible][illegible]

Costal Voucher

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440

Iselin, NJ 08830

Telephone: 7327094182

Fax: 7327911555

October 03, 2023

Invoice No. 17080

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson

Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson

For Services Rendered from 4/1/2023 Through 9/30/2023.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
9/1/2023	EPR	Receipt/review motion to dismiss by co-defendant	2.60	\$390.00
9/1/2023	EPR	Receipt/review of court order	0.40	\$60.00
9/1/2023	EPR	status review	1.60	\$240.00
9/8/2023	EPR	status review	0.80	\$120.00
9/8/2023	EPR	Research - Rule 26t	1.20	\$180.00
9/8/2023	EPR	calendar	0.40	\$60.00
9/12/2023	EPR	Status review	1.30	\$195.00
9/13/2023	EPR	status review	1.20	\$180.00
9/13/2023	EPR	calendar motions	0.30	\$45.00
9/13/2023	EPR	Digest complaint	2.40	\$360.00
9/13/2023	EPR	Receipt/review court notice	0.40	\$60.00
9/13/2023	EPR	Receipt/review motion to dismiss	3.40	\$510.00
9/14/2023	EPR	Receipt/review of co-defendant's motion	3.10	\$465.00
9/14/2023	EPR	Court notice	0.40	\$60.00
9/14/2023	EPR	Status review	1.10	\$165.00
9/15/2023	EPR	legal research	3.10	\$465.00
9/15/2023	EPR	Receipt/review of correspondence from co-defendant	0.30	\$45.00
9/15/2023	EPR	correspondence from adversary	0.40	\$60.00
9/18/2023	EPR	Receipt/review motion to dismiss	1.80	\$270.00

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Matter Number: 153-0002

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9/18/2023	EPR	Legal research	2.10	\$315.00
9/18/2023	EPR	court notice	0.40	\$60.00
9/18/2023	EPR	Receipt/review court order	0.30	\$45.00
9/18/2023	EPR	calendar dates	0.20	\$30.00
9/18/2023	EPR	Review Joint Discovery Plan	0.90	\$135.00
9/20/2023	EPR	legal research	2.10	\$315.00
9/21/2023	EPR	Receipt/review of motion	2.10	\$315.00
9/21/2023	EPR	Receipt/review memorandum of law	2.40	\$360.00
9/21/2023	EPR	Status review	1.20	\$180.00
9/22/2023	EPR	email from court re:motions	0.40	\$60.00
9/22/2023	EPR	Status review	1.00	\$150.00
9/22/2023	EPR	court notice	0.30	\$45.00
9/22/2023	EPR	letter from co-defendant	0.40	\$60.00
9/25/2023	EPR	letter from court re: motions	0.40	\$60.00
9/25/2023	EPR	letter from co-defendant	0.30	\$45.00
9/28/2023	EPR	status review	1.60	\$240.00
9/28/2023	EPR	review motions	2.30	\$345.00
Billable Hours / Fees:			44.60	\$6,690.00

Timekeeper Summary

Timekeeper EPR worked 44.60 hours at \$150.00 per hour, totaling \$6,690.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
9/13/2023	B/W Photocopies	\$41.60	
9/18/2023	B/W Photocopies	\$2.10	
9/19/2023	B/W Photocopies	\$12.35	
9/19/2023	B/W Photocopies	\$16.90	
Total Costs		\$72.95	

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Client Number: 4793
Matter Number: 153-0002

10/3/2023
Page: 3

Current Invoice Summary

Current Fees:	\$6,690.00
Advanced Costs:	\$72.95
TOTAL AMOUNT DUE:	<u>\$6,762.95</u>

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



Vendor: RAINONE COUGHLIN MINCHELLO

Address: 555 US HIGHWAY ONE SOUTH, STE 440
ISELN, NJ 08930

Being duly sworn according to law, saith that the above claim against "The County of Hudson", is just and true, and that the work has been performed, and the materials have been furnished, that no bonus has been given or received by any person or persons with the knowledge of said deponent in connection with the above claim: That it is in all respects a bona fide and fair claim and that the amount charged is a reasonable one.

Title

CRC # 26099

10/18/23

Division Chief

Director

Contract No. _____

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Digital Voucher

County Executive

* All bold items must be completed.

Rainone Coughlin Minchello, LLC

555 U.S. Highway One South,
Suite 440
Iselin, NJ 08830
Telephone: 7327094182
Fax: 7327911555

September 12, 2023

Invoice No. 16949

County of Hudson
Office of County Counsel
567 Pavonia Avenue
Jersey City, NJ 07306

Client Number: 4793 County of Hudson
Matter Number: 153-0002 HUDSON Roman, Eunice v. County of Hudson
For Services Rendered from 3/1/2023 Through 8/31/2023.

Fees				
<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
8/15/2023	EPR	Receive new assignment - open file	1.10	\$165.00
8/15/2023	EPR	Review case jacket	0.80	\$120.00
8/15/2023	EPR	Review Amended Complaint	2.40	\$360.00
8/15/2023	EPR	Review retainer	0.50	\$75.00
8/15/2023	EPR	Receipt/review correspondence from County Counsel	1.10	\$165.00
8/15/2023	EPR	Review Court orders	0.80	\$120.00
8/15/2023	BPT	Receipt and review complaint and documents	0.70	\$105.00
8/16/2023	EPR	Draft Notice of Appearance	0.50	\$75.00
8/16/2023	EPR	Review/edit/file Notice of Appearance	0.50	\$75.00
8/16/2023	EPR	Review motions	2.10	\$315.00
8/16/2023	EPR	Review Summons	0.40	\$60.00
8/16/2023	EPR	Review Reservation of Rights	0.40	\$60.00
8/16/2023	EPR	Calendar dates	0.40	\$60.00
8/18/2023	EPR	Review status	0.50	\$75.00
8/18/2023	EPR	Legal research	3.20	\$480.00
8/18/2023	EPR	Receipt/review Court filings	0.50	\$75.00
8/18/2023	EPR	emails with co-counsel	0.40	\$60.00
8/18/2023	EPR	Draft Answer	1.30	\$195.00
8/21/2023	EPR	Review Notice of Tort Claims	0.50	\$75.00

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Client Number: 4793
Matter Number: 153-0002

9/12/2023

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8/21/2023	EPR	Legal Research	2.20	\$330.00
8/21/2023	EPR	Draft Answer/Separate Defenses/Crossclaims	3.30	\$495.00
8/21/2023	EPR	Review Drop Box from co-defendant	0.80	\$120.00
8/22/2023	EPR	Edit/review/file Answer/Crossclaims/Separate Defenses	3.80	\$570.00
8/23/2023	EPR	Review co-defendant's legal brief	3.40	\$510.00
8/24/2023	EPR	Review Drop Box	0.80	\$120.00
8/24/2023	EPR	Review Brief of Co-defendant Edwards	3.10	\$465.00
8/24/2023	EPR	Review emails	0.70	\$105.00
8/24/2023	EPR	Document review	2.10	\$315.00
8/24/2023	EPR	calendar dates	0.40	\$60.00
8/24/2023	EPR	Review Notice of Claim	0.80	\$120.00
8/24/2023	EPR	Review Inmate Processing Form	0.40	\$60.00
8/24/2023	EPR	Review Death/Incident Report	2.70	\$405.00
8/24/2023	EPR	Legal Research - Rule 26 Disclosures	1.70	\$255.00
8/24/2023	EPR	Status review	1.00	\$150.00
8/25/2023	EPR	Receipt/review of co-defendant Hudson's Motion to Dismiss	3.10	\$465.00
8/25/2023	EPR	Review/Digest In Custody Suicide Death Procedures	2.80	\$420.00
8/25/2023	EPR	Receipt/review Court notice	0.40	\$60.00
8/25/2023	EPR	Receipt/review Final Draft of Co-defendant Edwards' Motion to Dismiss	1.20	\$180.00
8/25/2023	EPR	Calendar dates	0.40	\$60.00
8/25/2023	EPR	Receipt/review of Court notice re:Summons	0.40	\$60.00
8/30/2023	EPR	Receipt/review proposed order	0.30	\$45.00
8/30/2023	EPR	Review pleadings	2.10	\$315.00
8/30/2023	EPR	Receipt/review court notices	0.50	\$75.00

Billable Hours / Fees: 56.50 \$8,475.00

Timekeeper Summary

Timekeeper EPR worked 55.80 hours at \$150.00 per hour, totaling \$8,370.00.

Timekeeper BPT worked 0.70 hours at \$150.00 per hour, totaling \$105.00.

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HUDSON COUNTY INSURANCE FUND COMMISSION

RESOLUTION NO: 2023 - 065

MEETING DATE: 09-28-2023

**RESOLUTION AUTHORIZING THE AWARD
OF A PROFESSIONAL SERVICE AGREEMENT TO
RAINONE COUGHLIN MINCHELLO
(\$40,000.00)**

COMMISSIONERS: Fuller **OFFERED AND** Drancher
MOVED ADOPTION OF THE FOLLOWING RESOLUTION:

WHEREAS, there has been instituted a suit in the United States District Court, District of New Jersey, Newark Vicinage under Civil Action No. 23-2811 entitled Eunice Roman v. County of Hudson; and

WHEREAS, the gravamen of the complaint touches upon and is the direct result of alleged actions by Alejandro Mendez in the course of his employment with the County; and

WHEREAS, while the Office of the County Counsel does represent the County as an entity, the person identified above as an individual Defendant is entitled to the appointment of independent counsel under the several articles dealing with legal representation, as well as past practice and procedure; and

WHEREAS, the County Counsel has met, interviewed and recommended the following law firm due to their education and experience for the position of individual defense counsel for Alejandro Mendez:

**Rainone Coughlin Minchello
555 U.S. Highway One South – Suite 440
Iselin, New Jersey 08830**

WHEREAS, the County Counsel believes that the firm set forth above can and will effectively represent Alejandro Mendez in the defense of the suit and has previously been approved as outside counsel to the IFC through Resolution #2022-073 following a fair and open process in which said firm provided a qualifications statement pursuant to public advertising; and

WHEREAS, the cost of such representation shall not exceed the sum of **FORTY THOUSAND (\$40,000.00) DOLLARS**, which shall be paid at the rate of \$150.00 per hour; and

WHEREAS, Cheryl G. Fuller, Director of Finance and Administration has certified that funds are available for this purpose through the Insurance Fund Commission.

NOW, THEREFORE BE IT RESOLVED, by the Hudson County Insurance Fund Commission, that:

1. The aforesaid recitals are incorporated herein as if fully set forth at length.
2. The Office of Risk Management is hereby authorized to oversee the payment of **FORTY THOUSAND (\$40,000.00) DOLLARS** to Rainone Coughlin Minchello, 555 U.S. Highway One South, Suite 440, Iselin, New Jersey 08830.
3. This Resolution shall take effect immediately.

CERTIFICATION

<u>RECORD OF VOTES</u>	<u>AYES</u>	<u>NAYS</u>	<u>ABSENT</u>
David B. Drumeler, Chairperson	☒	☐	☐
Cheryl G. Fuller, Commissioner	☒	☐	☐
Kenneth Kopacz, Commissioner	☐	☐	☒

I, John Metro, certify that at a meeting of the Hudson County Insurance Fund Commission held on this 28th day of September, 2023 the aforesaid Resolution was duly adopted. 2 members voted in the affirmative and 0 members voted in the negative.

Secretary

Date Prepared:

9/28/2023

INSURANCE FUND COMMISSION
RESOLUTION FACT SHEET

DEPARTMENT: Office of the County Counsel

DIVISION: Law

SOURCE: Alberico De Pierro, Assistant County Counsel

CONTRACTOR/PROGRAM TITLE: Rainone Coughlin Minchello –RE: Eunice Roman v. County of Hudson

AMOUNT: \$40,000.00

RATIONALE FOR CONTRACTING/ACTION:

**Professional Services Contract
(Representing Alejandro Mendez)**

MEMORANDUM

TO: DANIEL DeSALVO, DEPUTY COUNTY COUNSEL
FROM: ALBERICO De PIERRO, ASSISTANT COUNTY COUNSEL
DATE: SEPTEMBER 1, 2023
RE: EUNICE ROMAN v. COUNTY OF HUDSON
(Rainone Coughlin Minchello/Professional Services Resolution)

In this case, Alejandro Mendez has been named individually along with the County of Hudson wherein Eunice Roman on behalf of the Estate of Albert Roman, has filed a wrongful death claim. Albert Roman was incarcerated at the Hudson County Jail and committed suicide. We will need to obtain outside counsel for Alejandro Mendez with reference to the allegations claimed in the above referenced matter.

Upon review of the pleading, it has been decided that there are allegations which could technically take him outside the scope of his employment. Because of this, it is believed that it is necessary to hire separate counsel for Alejandro Mendez with a Reservation of Rights.

Therefore, it is respectfully requested that the IFC approval a Resolution hiring separate counsel for Alejandro Mendez in this matter, namely the law firm of Rainone Coughlin Minchello.

s/Alberico De Pierro

Alberico De Pierro
Assistant County Counsel

AD:dmp