

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
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Iselin, NJ 08830
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October 01, 2024

County of Union
Office of the County Counsel
10 Elizabethtown Plaza
Elizabeth, NJ 07207

Invoice No. 20302

Client Number: 433 County of Union
Matter Number: 62-0022 UNION COUNTY Daphney Cedres v. Union County, et al
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>
9/3/2024	BPT	Receipt and review deposition transcript of Plaintiff	2.60	\$481.00
9/9/2024	MMW	Began to read, reviewed, and annotated the deposition transcript of the plaintiff/witness Daphney Cedres	1.30	\$214.50
9/9/2024	MMW	Began drafting deposition summary memorandum to file of the plaintiff/witness Daphney Cedres	1.20	\$198.00
9/10/2024	MMW	Continued review of plaintiff/witness daphney cedres deposition transcript and exhibits marked P-1 through P-10	0.80	\$132.00
9/10/2024	MMW	Continued drafting deposition summary memorandum to file of the plaintiff/witness Daphney Cedres	1.40	\$231.00
9/11/2024	MMW	Edited memorandum summarizing plaintiff/witness deposition transcript	0.80	\$132.00
9/11/2024	BPT	Receipt and review deposition transcript of D. Pryor	2.80	\$518.00
9/16/2024	BPT	Draft summary to client re: [REDACTED]	2.90	\$536.50
9/16/2024	BPT	Draft correspondence to A. Boquet re: expert report	0.20	\$37.00
9/18/2024	BPT	Correspondence with M. Olves re: status (x2)	0.40	\$74.00
9/23/2024	BPT	Draft correspondence to A. Boquet re: status	0.20	\$37.00
9/23/2024	BPT	Draft correspondence to M. Olvera re: status	0.20	\$37.00

Continued On Next Page

Client Number: 433
Matter Number: 62-0022

10/1/2024

Page: 2

Billable Hours / Fees: 14.80 \$2,628.00

Timekeeper Summary

Timekeeper BPT worked 9.30 hours at \$185.00 per hour, totaling \$1,720.50.

Timekeeper MMW worked 5.50 hours at \$165.00 per hour, totaling \$907.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
7/16/2024	B/W Photocopies	\$1.30	
7/16/2024	B/W Photocopies	\$0.60	
7/16/2024	B/W Photocopies	\$0.60	
8/27/2024	B/W Photocopies	\$0.60	
8/27/2024	B/W Photocopies	\$0.60	
8/27/2024	B/W Photocopies	\$1.60	
8/27/2024	B/W Photocopies	\$1.60	
9/6/2024	Overnight Delivery Charge	\$23.22	
9/6/2024	Overnight Delivery Charge	\$23.22	
9/6/2024	Deposition Transcript of Daphney Cedres from Magna Legal Services	\$827.20	
Total Costs		\$880.54	

Current Invoice Summary

Current Fees:	\$2,628.00
Advanced Costs:	\$880.54
TOTAL AMOUNT DUE:	\$3,508.54

Thank You for Letting Us Serve You.

Payment Due Upon Receipt.

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
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August 12, 2024

Invoice No. 19920

County of Union
Office of the County Counsel
10 Elizabethtown Plaza
Elizabeth, NJ 07207

Client Number: 433 County of Union
Matter Number: 62-0022 UNION COUNTY Daphney Cedres v. Union County, et al
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>
7/1/2024	RPJ	Receipt/Review of email from A. Chappotin re: [REDACTED]	0.20	\$19.00
7/8/2024	SJ	review and finalize subpoena for employment records	0.50	\$47.50
7/8/2024	SJ	review and finalize subpoena questionnaire for employment records	0.60	\$57.00
7/8/2024	BPT	Edit and revise employment subpoena	0.50	\$92.50
7/9/2024	BPT	Correspondence with counsel re: depositions (x4)	0.80	\$148.00
7/9/2024	BPT	Receipt and review correspondence from A. Chappotin re: deposition	0.20	\$37.00
7/9/2024	BPT	Receipt and review correspondence from GRC re: withdrawal of complaint	0.20	\$37.00
7/9/2024	BPT	Receipt and review correspondence from Druckman, Esq. re: depositions	0.20	\$37.00
7/10/2024	SJ	email subpoena for employment records to GS	0.20	\$19.00
7/10/2024	SJ	e-mails from GS re subpoena served onto Rutgers for employment records x2	0.30	\$28.50
7/10/2024	SJ	email to Moshood M. [REDACTED]	0.20	\$19.00
7/10/2024	SJ	email to Crystal B. re engineering appt	0.20	\$19.00
7/10/2024	BPT	Receipt and review x-rays from Plaintiff	0.40	\$74.00
7/11/2024	SJ	email to Crystal B. in response to her intake in preparation for scheduling appt.	0.20	\$19.00

Continued On Next Page

7/11/2024	SJ	organize and compile records/documents to be sent to engineer in preparation for report	0.70	\$66.50
7/12/2024	SJ	create a onedrive link with all documents for engineering appt and email it to Crystal B.	0.40	\$38.00
7/12/2024	SJ	email to James M. re engineering appointment	0.20	\$19.00
7/12/2024	BPT	Receipt and review correspondence from counsel re: discovery	0.20	\$37.00
7/12/2024	BPT	Receipt and review correspondence from liability expert	0.20	\$37.00
7/15/2024	SJ	Draft deposition notice for plaintiff	0.40	\$38.00
7/15/2024	SJ	Draft cover ltr to plaintiff's counsel requesting HIPAAs	0.20	\$19.00
7/15/2024	SJ	Draft HIPAA for Park Physical Therapy for plaintiff to sign	0.40	\$38.00
7/15/2024	SJ	Draft HIPAA for Visiting Nurses Physical Therapy for plaintiff to sign	0.40	\$38.00
7/15/2024	RPJ	Receipt/Review court notice re: Order compelling Defendant's deposition	0.20	\$19.00
7/15/2024	SJ	email to plaintiff and co-defendant re dep of plaintiff	0.30	\$28.50
7/15/2024	BPT	Receipt and review order to compel depositions	0.20	\$37.00
7/15/2024	BPT	Edit and revise HIPAA releases	0.30	\$55.50
7/15/2024	BPT	Correspondence with counsel re: depositions (x2)	0.40	\$74.00
7/15/2024	BPT	Correspondence with expert re: [REDACTED]	0.40	\$74.00
7/15/2024	BPT	Draft correspondence to A. Chappotin re: deposition	0.20	\$37.00
7/16/2024	SJ	telephone call with Tamika from Dr. Peckers office re scheduling plaintiff for an IME	0.20	\$19.00
7/16/2024	SJ	email to tamika attached onedrive link with medicals/documents for Dr. Pecker to review in preparation for plaintiff's IME appt	0.20	\$19.00
7/16/2024	SJ	organize and compile records/documents to be sent to Dr. Pecker in preparation for IME appt	0.70	\$66.50
7/16/2024	BPT	Attendance at meeting with J. Marroccoli	0.40	\$74.00
7/16/2024	BPT	Edit and revise deposition notice for Plaintiff	0.20	\$37.00
7/16/2024	BPT	Draft motion to extend discovery	1.20	\$222.00
7/17/2024	BPT	Receipt and review information from rebuttal expert	0.50	\$92.50
7/17/2024	BPT	Finalize motion to extend	0.30	\$55.50

Continued On Next Page

7/17/2024	BPT	Correspondence with Pasquale, Esq. re: motion to extend (x2)	0.40	\$74.00
7/17/2024	BPT	Receipt and review notice from Court re: motion to extend	0.20	\$37.00
7/17/2024	BPT	Draft correspondence to M. Muftau, Esq. re: [REDACTED]	0.20	\$37.00
7/18/2024	BPT	Receipt and review correspondence from Muftau, Esq. re: [REDACTED]	0.20	\$37.00
7/19/2024	BPT	Correspondence with J. Marroccoli re: expert report (x2)	0.40	\$74.00
7/19/2024	BPT	Correspondence with A. Chappotin re: [REDACTED]	0.60	\$111.00
7/24/2024	BPT	Receipt and review HIPAA releases	0.30	\$55.50
7/25/2024	RPJ	Draft letter to court re: representative availability and lack of response from adversary/request amendment to prior Order	0.80	\$76.00
7/25/2024	BPT	Edit and revise letter and proposed form of order re: deposition	0.30	\$55.50
7/26/2024	RPJ	Revise letter to Judge Lindemann re: amending order. Provide letter to adversary as exhibit with proposed amended order and file same	0.80	\$76.00
7/26/2024	RPJ	Receipt/Review of court notice re: amendment filing	0.20	\$19.00
7/26/2024	SJ	email to Dr. Pecker re IME appt for plaintiff	0.20	\$19.00
7/26/2024	SJ	draft IME appointment ltr	0.30	\$28.50
7/26/2024	SJ	email to Ronna Pecker re IME appt on 8/6	0.20	\$19.00
7/26/2024	SJ	email to plaintiff's atty Jonathan D. re IME appointment	0.20	\$19.00
7/29/2024	BPT	Correspondence with Druckman, Esq. re: deposition (x2)	0.40	\$74.00
7/29/2024	MRT	Review of complaint and discovery files in [REDACTED]	2.90	\$536.50
7/30/2024	RPJ	Receipt/Review of email from adversary re: Roselle dep	0.20	\$19.00
7/30/2024	RPJ	Receipt/Review of email from adversary re: dates proposed for Union rep acceptable	0.20	\$19.00
7/30/2024	SJ	Draft cvr ltr requesting medical records; draft certification of custodian of records re Physical Therapy	0.50	\$47.50
7/30/2024	SJ	Draft cvr ltr requesting medical records; draft certification of custodian of records re Visiting Nurse Association	0.50	\$47.50

Continued On Next Page

Client Number: 433
Matter Number: 62-0022

8/12/2024

Page: 4

7/30/2024	SJ	email to plaintiffs counsel attaching a copy of 2 medical records request	0.30	\$28.50
7/30/2024	MRT	Correspondence from plaintiff's counsel re deposition.	0.20	\$37.00
7/30/2024	MRT	Correspondence from co-defendant counsel re deposition.	0.20	\$37.00
7/30/2024	MRT	Correspondence from co-defendant counsel re additional documents.	0.20	\$37.00
7/30/2024	MRT	Receipt and review of documents from co-defendant counsel re discovery.	0.80	\$148.00
7/31/2024	RPJ	Receipt/Review of Cedres file from Rutgers	0.60	\$57.00
7/31/2024	RPJ	Draft email to A. Chappotin re: [REDACTED] [REDACTED]	0.40	\$38.00
7/31/2024	MRT	Attendance at deposition of Roselle representative via Zoom.	1.20	\$222.00

Billable Hours / Fees:	27.40	\$3,980.00
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Timekeeper Summary

Timekeeper RPJ worked 3.60 hours at \$95.00 per hour, totaling \$342.00.

Timekeeper SJ worked 8.50 hours at \$95.00 per hour, totaling \$807.50.

Timekeeper BPT worked 9.80 hours at \$185.00 per hour, totaling \$1,813.00.

Timekeeper MRT worked 5.50 hours at \$185.00 per hour, totaling \$1,017.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
7/15/2024	Guaranteed Subpoena to Rutgers Family Medicine	\$107.00	
7/16/2024	B/W Photocopies	\$1.30	
7/16/2024	B/W Photocopies	\$0.60	
7/16/2024	B/W Photocopies	\$0.60	
7/23/2024	Overnight Delivery Charge	\$23.57	
7/25/2024	Postage	\$0.69	
7/26/2024	Overnight Delivery Charge	\$23.57	
7/26/2024	Filing Fee Motion Extend Discovery	\$50.00	
Total Costs		\$207.33	

Continued On Next Page

Client Number: 433
Matter Number: 62-0022

8/12/2024
Page: 5

Current Invoice Summary

Current Fees:	\$3,980.00
Advanced Costs:	\$207.33
TOTAL AMOUNT DUE:	<u>\$4,187.33</u>

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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
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November 05, 2024

Invoice No. 20646

County of Union
Office of the County Counsel
10 Elizabethtown Plaza
Elizabeth, NJ 07207

Client Number: 433 County of Union
Matter Number: 62-0022 UNION COUNTY Daphney Cedres v. Union County, et al
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>
10/7/2024	BPT	Correspondence with A. Boquet re: expert report (x2)	0.40	\$74.00
10/8/2024	BPT	Telephone call with A. Boquet re: expert report	0.80	\$148.00
10/8/2024	BPT	Correspondence with counsel re: extension of time to submit expert reports (x4)	0.80	\$148.00
10/10/2024	BPT	Receipt and review deposition transcript for A. Chappotin	1.20	\$222.00
10/25/2024	BPT	Receipt and review correspondence from Bergen, ESq. re: [REDACTED]	0.20	\$37.00
Billable Hours / Fees:			3.40	\$629.00

Timekeeper Summary

Timekeeper BPT worked 3.40 hours at \$185.00 per hour, totaling \$629.00.

Continued On Next Page

Client Number: 433
Matter Number: 62-0022

11/5/2024
Page: 2

Current Invoice Summary

Current Fees:	\$629.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$629.00

Thank You for Letting Us Serve You.
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RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
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Iselin, NJ 08830
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September 03, 2024

Invoice No. 19968

County of Union
Office of the County Counsel
10 Elizabethtown Plaza
Elizabeth, NJ 07207

Client Number: 433 County of Union
Matter Number: 62-0022 UNION COUNTY Daphney Cedres v. Union County, et al
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>
8/1/2024	RPJ	Receipt/Review email from A. Chappotin re: [REDACTED]	0.20	\$19.00
8/1/2024	BPT	Receipt and review discovery responses from Roselle	2.80	\$518.00
8/2/2024	SJ	receipt and review courts notification re arbitration 11/21	0.20	\$19.00
8/2/2024	BPT	Correspondence with A. Chappotin re: [REDACTED]	0.40	\$74.00
8/2/2024	BPT	Receipt and review order extending discovery	0.20	\$37.00
8/2/2024	BPT	Receipt and review notice from Court re: arbitration	0.20	\$37.00
8/3/2024	BPT	Receipt and review records for Plaintiff in response to employment subpoena	1.20	\$222.00
8/4/2024	BPT	Review file for preparation of deposition of Plaintiff	4.30	\$795.50
8/5/2024	SJ	review fax correspondence re invoice for park physical therapy	0.20	\$19.00
8/5/2024	BPT	Receipt and review medical records from Park Physical Therapy	0.70	\$129.50
8/6/2024	RPJ	Receipt/Review of file re: discovery/litigation status	0.40	\$38.00
8/7/2024	BPT	Receipt and review IME report	1.30	\$240.50
8/7/2024	BPT	Receipt and review correspondence from Druckman, Esq. re: deposition	0.20	\$37.00

Continued On Next Page

Client Number: 433
Matter Number: 62-0022

9/3/2024
Page: 2

8/8/2024	BPT	Correspondence with counsel re: deposition (x4)	0.80	\$148.00
8/9/2024	SJ	email to magna re scheduling a reporter for plaintiffs deposition	0.20	\$19.00
8/9/2024	SJ	draft letter amending plaintiffs employment records from rutgers	0.20	\$19.00
8/9/2024	SJ	email to plaintiffs counsel amending employment records from Rutgers	0.20	\$19.00
8/9/2024	SJ	draft letter amending medical records from park physical therapy	0.20	\$19.00
8/9/2024	BPT	Correspondence with counsel re: deposition (x4)	0.80	\$148.00
8/9/2024	BPT	Edit and revise letter amending interrogatories to include Plaintiff's employment records	0.20	\$37.00
8/9/2024	BPT	Edit and revise letter amending interrogatories to include records from Park Physical Therapy	0.20	\$37.00
8/12/2024	BPT	Attendance at deposition of Plaintiff	3.30	\$610.50
8/12/2024	BPT	Correspondence with counsel re: deposition exhibits (x6)	1.20	\$222.00
8/13/2024	SJ	Draft cover ltr to plaintiff enclosing 2 additional HIPAA authorizations for plaintiff to sign	0.20	\$19.00
8/13/2024	SJ	Draft 2 HIPAA authorizations to send to plaintiff's counsel for her signature	0.50	\$47.50
8/13/2024	SJ	draft ltr amending records to include Dr. Pecker expert report	0.20	\$19.00
8/13/2024	SJ	email Druckman amendment to rogs to include Dr. Peckers report	0.20	\$19.00
8/13/2024	BPT	Edit and revise letter amending interrogatories to include defense IME report	0.20	\$37.00
8/13/2024	BPT	Edit and revise HIPAA releases for Plaintiff's images	0.30	\$55.50
8/13/2024	BPT	Receipt and review deposition notice for County representative	0.20	\$37.00
8/13/2024	BPT	Draft supplemental discovery demands for records from Plaintiff's deposition	0.50	\$92.50
8/15/2024	BPT	Receipt and review correspondence from M. Olvera re: status	0.20	\$37.00
8/19/2024	BPT	Preparation and attendance at meeting with A. Chappotin	1.20	\$222.00
8/20/2024	BPT	Correspondence with counsel re: deposition exhibits (x4)	0.80	\$148.00

Continued On Next Page

Client Number: 433
Matter Number: 62-0022

9/3/2024
Page: 3

8/20/2024	BPT	Correspondence with counsel re: deposition of A. Chappotin (x7)	1.40	\$259.00
8/20/2024	BPT	Draft correspondence to A. Chappotin re: [REDACTED]	0.20	\$37.00
8/21/2024	BPT	Preparation and attendance at deposition of A. Chappotin	2.40	\$444.00
8/21/2024	BPT	Draft correspondence to A. Boquet re: expert report	0.20	\$37.00
8/22/2024	BPT	Receipt and review letter from counsel re: discovery	0.20	\$37.00
8/23/2024	BPT	Receipt and review HIPAA authorizations	0.30	\$55.50
8/26/2024	SJ	retrive medical records and bills from VNA	0.30	\$28.50
8/26/2024	BPT	Receipt and review Plaintiff's medical records from Visiting Nurses Association	2.60	\$481.00
8/26/2024	BPT	Correspondence with Druckman, Esq. re: discovery (x2)	0.40	\$74.00
8/26/2024	BPT	Edit and revise letters to medical providers to include HIPAA releases (x2)	0.40	\$74.00
8/26/2024	RPJ	Receipt/Review of email from adversary re: adopting Park Physical therapy records	0.40	\$38.00
8/27/2024	SJ	draft ltr and certification of records to RWJ for specific diagnostic imaging	0.40	\$38.00
8/27/2024	SJ	draft ltr and certification of records to trinitas for specific diagnostic imaging	0.40	\$38.00
8/27/2024	SJ	Draft letter amending medical records from VNA	0.20	\$19.00
8/27/2024	SJ	email to J. Druckman re HIPAA request we sent to RWJ & Trinitas	0.20	\$19.00
8/27/2024	SJ	email J. Druckman amending medical records to include VNA records	0.20	\$19.00
8/27/2024	BPT	Edit and revise letter amending discovery responses to include medical records from VNA	0.20	\$37.00
8/27/2024	BPT	Edit and revise HIPAA releases	0.30	\$55.50
8/27/2024	BPT	Receipt and review correspondence from M. Olvera re: status	0.20	\$37.00
8/28/2024	BPT	Receipt and review supplemental discovery responses from Plaintiff	0.40	\$74.00

Billable Hours / Fees:	35.40	\$6,099.00
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Continued On Next Page

Client Number: 433
Matter Number: 62-0022

9/3/2024
Page: 4

Timekeeper Summary

Timekeeper BPT worked 30.40 hours at \$185.00 per hour, totaling \$5,624.00.

Timekeeper SJ worked 4.00 hours at \$95.00 per hour, totaling \$380.00.

Timekeeper RPJ worked 1.00 hours at \$95.00 per hour, totaling \$95.00.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
8/7/2024	Medical Records of Daphney Cedres from Park Physical Therapy Associates	\$19.00	
8/8/2024	Overnight Delivery Charge	\$45.87	
8/8/2024	Overnight Delivery Charge	\$23.37	
8/15/2024	Postage	\$0.97	
8/20/2024	Deposition Transcript of Delmonte Pryor	\$189.95	
8/27/2024	Overnight Delivery Charge	\$23.22	
	Total Costs	\$302.38	

Current Invoice Summary

Current Fees:	\$6,099.00
Advanced Costs:	\$302.38
TOTAL AMOUNT DUE:	\$6,401.38

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

RAINONE COUGHLIN MINCHELLO, LLC

555 U.S. Highway One South,
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Iselin, NJ 08830
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December 04, 2024

Invoice No. 20968

County of Union
Office of the County Counsel
10 Elizabethtown Plaza
Elizabeth, NJ 07207

Client Number: 433 County of Union

Matter Number: 62-0022 UNION COUNTY Daphney Cedres v. Union County, et al

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>
11/1/2024	ZM	Receipt and review e-mail from Bruce H. Bergen.	0.20	\$19.00
11/4/2024	ZM	Legal research into [REDACTED] [REDACTED] [REDACTED]	2.00	\$190.00
11/4/2024	ZM	Read and took notes on the 2022 License Agreement.	0.70	\$66.50
11/4/2024	ZM	Began drafting memorandum to [REDACTED] [REDACTED]	0.60	\$57.00
11/4/2024	BPT	Receipt and review supplemental medical records from Plaintiff	1.60	\$296.00
11/4/2024	BPT	Correspondence with expert re: [REDACTED]	0.40	\$74.00
11/4/2024	BPT	Receipt and review draft expert report	0.90	\$166.50
11/7/2024	BPT	Draft status update for County Counsel	2.40	\$444.00
11/7/2024	RPJ	Receipt/Review of email from B. Bergen re: status	0.20	\$19.00
11/7/2024	RPJ	Receipt/Review of court notice re: substitution of attorney	0.20	\$19.00
11/8/2024	RPJ	Receipt/Review of court notice re: co-def Motion to Extend Discovery	0.40	\$38.00
11/11/2024	RPJ	Receipt/Review court notice re: adjournment request of arbitration	0.20	\$19.00
11/12/2024	RPJ	Receipt/Review court notice re: motion to extend discovery returnable 12/6	0.20	\$19.00

Continued On Next Page

Client Number: 433
Matter Number: 62-0022

12/4/2024

Page: 2

11/12/2024	RPJ	Receipt/Review court notice re: arbitration rescheduled	0.20	\$19.00
11/12/2024	RPJ	Receipt/Review clerk notice re: arbitration needs to be rescheduled with Mr. Johnstone	0.20	\$19.00
11/14/2024	SJ	Generate onedrive link, download and combine entire file in preparation to send file over to new counsel M. Simitz.	0.80	\$76.00
11/15/2024	SJ	Letter to M. Simitz enclosing our entire file via onedrive link.	0.30	\$28.50
11/18/2024	SJ	Letter to M. Simitz enclosing original imaging disk from RWJ.	0.20	\$19.00
Billable Hours / Fees:			11.70	\$1,588.50

Timekeeper Summary

Timekeeper RPJ worked 1.60 hours at \$95.00 per hour, totaling \$152.00.

Timekeeper SJ worked 1.30 hours at \$95.00 per hour, totaling \$123.50.

Timekeeper BPT worked 5.30 hours at \$185.00 per hour, totaling \$980.50.

Timekeeper ZM worked 3.50 hours at \$95.00 per hour, totaling \$332.50.

Cost Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>	<u>Check No.</u>
11/22/2024	Postage	\$9.92	
Total Costs		\$9.92	

Current Invoice Summary

Current Fees:	\$1,588.50
Advanced Costs:	\$9.92
TOTAL AMOUNT DUE:	\$1,598.42

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