

Invoice

Bill to:

City of Haines City - Litigation
 c/o James Elensky, City Manager
 620 East Main Street
 Haines City, FL 33844

Invoice #:	0000132
Date:	8/2/2023
Amount due:	9600.60
Terms of payment:	

Here goes text above the list of items.

Item	Description	Qty	Unit cost	Price
Time log	7/6/2023, Bowen TV/McCall, Correspondence: Drafted email to Attorney John Murphy re: City of Winter Have ocde enforcement liens;	0.15	210.00	31.50
Time log	7/6/2023, Bowen TV/McCall, Correspondence: Reviewed two (2) emails from Loyd Stewart and Michael Triano re: Phase 1 Environmental Audits; Drafted two (2) reply emails to Michael Triano re: Audits;	0.33	210.00	69.30
Time log	7/7/2023, Bowen TV/McCall, Correspondence: Reviewed two (2) emails from Attorney Mark Lawson and Attorney Vanessa Bolton re: stipulated settlement;	0.08	210.00	16.80
Time log	7/7/2023, Caron-Langlois, Reviewed document(s) : Reviewed email from Sharon Lauther and three (3) letters from Arych Frank (Morgan & Morgan) re: claim, insurance coverage and retention of evidence; Reviewed email from Sharon Lauther re: claim and drafted reply email;	0.32	210.00	67.20
Time log	7/9/2023, Mohit v. COHC 2nd DCA 2022, Reviewed document (s): Reviewed email from Court Administrator; Reviewed Mohit's Motion for Rehearing, Clarification, Certification, and/or Written Opinion;	0.83	210.00	174.30
Time log	7/10/2023, Bowen TV/McCall, Correspondence: Reviewed email from Brian Ross re: recording of City Commission meeting;	0.02	210.00	4.20
Time log	7/10/2023, Bowen TV/McCall, Telecom : Telecom from John Murphy, City Attorney for City of Winter Haven, concerning code enforcement liens and status of Stipulated Settlement negotiations;	0.23	210.00	48.30
Time log	7/10/2023, Bowen TV/McCall, Telecom : Telecom to Attorney Mark Lawson re: discussion with Attorney John Murphy re: City of Winter Haven code enforcement liens;	0.13	210.00	27.30
Time log	7/10/2023, Mohit v. COHC 2nd DCA 2022, Drafting document (s): Reviewed Appellate Rule 9.330 (Rehearing; Clarification; Certification; Written Opinion); Reviewed two Florida Bar Journal articles on Appellate Motion for Rehearing; Reviewed Florida Bar Journal article on Conflict Per Curiam Affirmed decisions; Reviewed McDonnell v. Sanford Airport Authority case; Began drafting Response to Motion for Rehearing;	3.08	210.00	646.80
Time log	7/10/2023, Mohit v. COHC 2nd DCA 2022, Drafting document (s): Researrch on Clarification, Certification and Written Opinion caselaw related to Rule 9.330(2)(B), (C) and (D), Florida Rules of Appellate Procedure; Drafting additional provisions for Response to Motion for Rehearing;	1.83	210.00	384.30

Item	Description	Qty	Unit cost	Price
Time log	7/11/2023, Mohit v. COHC 2nd DCA 2022, Drafting document (s): Drafting Response provisions related to Clarification, Certification and Written Opinion;	0.75	210.00	157.50
Time log	7/12/2023, Mohit v. COHC 2nd DCA 2022, Drafting document (s): Reviewing cases related to Clarification, Certification and Written Opinion; Drafting provisions of Response to Motion for Rehearing;	2.88	210.00	604.80
Time log	7/12/2023, PNC Bank v. Riley, Drafted document(s): Reviewed email from Erica Sanchez, Summons, Lis Pendens, Verified Complaint to Foreclose Mortgage, and Exhibits; Drafted Answer to Verified Complaint to Foreclose Mortgage; Confirmed City lien against subject property; Filed Answer through E-Filing Portal;	1.50	210.00	315.00
Time log	7/12/2023, Villegas, Nelson , Reviewed document(s): Reviewed email from Court Administrator and Notice to Defendant on Rights to Dissolve Writ and Certificate of Service;	0.07	210.00	14.70
Time log	7/13/2023, Bowen TV/McCall, Correspondence: Telecom to Attorney Mark Lawson re: status of Phase 1 Environmental Audits and impact on settlement negotiations; Telecom to Todd Deliman re: surveys for Bowen TV/McCall and Haines Depot, LLC; Drafted email to Mark Lawson and Jim Spalla re: surveys;	0.78	210.00	163.80
Time log	7/13/2023, Bowen TV/McCall, Telecom : Two (2) telecoms to Michael Triano re: Phase 1 Environmental Audit on McCall and Bowen TV parcels; Telecoms to Robert Dodd and Nell Johnson re; historical background; Telecom to Laurie at Attorney Michael Sznajstajler's office; Reviewed email from Michael Triano re: questions about McCall parcel;	1.78	210.00	373.80
Time log	7/13/2023, Wilmington Bank v. Donley, Drafted document(s): Drafted Answer to Amended Verified Complaint to Foreclose Mortgage; Confirmed recording to City's Order Imposing Fine; Filed Answer through E-Filing Portal;	1.50	210.00	315.00
Time log	7/14/2023, Bowen TV/McCall, Correspondence: Reviewed email from Attorney Mark Lawson re: Florida Department of Revenue Lien on Bowen TV parcel;	0.05	210.00	10.50
Time log	7/14/2023, PNC Bank v. Riley, Drafted document(s): Reviewed email from Court Administrator and Motion to Appoint Process Server;	0.07	210.00	14.70
Time log	7/16/2023, Mohit v. COHC Circuit Court 2023, Reviewed document(s): Reviewed email from Court Administrator, Complaint, Summons, Civil Cover Sheet and Exhibit;	0.67	210.00	140.70
Time log	7/17/2023, Bowen TV/McCall, Correspondence: Reviewed email from Todd Deliman re: McCall parcel survey; Drafted email to Attorney Mark Lawson and Attorney Jim Spalla re: survey;	0.10	210.00	21.00
Time log	7/17/2023, Bowen TV/McCall, Telecom : Telecom from Attorney Mark Lawson re: McCall parcel survey;	0.10	210.00	21.00
Time log	7/17/2023, Mohit v. COHC 2nd DCA 2022, Drafting document (s): Shepardized cases cited in Response to Motion for Rehearing; Drafted additional provisions for Response to Motion for Rehearing; Filed Response via E-Filing Portal;	2.83	210.00	594.30
Time log	7/17/2023, Mohit v. COHC Circuit Court 2023, Reviewed document(s): Reviewed Section 68.093, Florida Statutes re: vexatious litigant and security; Reviewed caselaw related to vexatious litigant and procedure for filing motion;	0.85	210.00	178.50
Time log	7/17/2023, Mohit v. COHC Circuit Court 2023, Reviewed document(s): Reviewed Circuit Court's Orders from 2021 case; Reviewed timeline for each of five cases filed by Mohit against the City; Research on legal standard for motion to dismiss based on res judicata; Began drafting timeline of cases and structure of motion for summary judgment; Reviewed Defendant's Answer and Affirmative Defenses in 2021 Circuit Court case;	1.57	210.00	329.70

Item	Description	Qty	Unit cost	Price
Time log	7/17/2023, Mohit v. COHC Circuit Court 2023, Telecom : Telecom from Attorney Linda Edwards re: new Complaint filed in Circuit Court seeking declaratory judgment; Discussed vexatious litigant, security, and sanctions (pursuant to Section 57.105, Florida Statutes; Drafted email to Linda Edwards re: Complaint;	1.07	210.00	224.70
Time log	7/18/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Began drafting Motion for Summary Judgment;	2.25	210.00	472.50
Time log	7/18/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Reviewed Section 90.202, Florida Statutes, re: matters which may be judicially noticed; Drafting portions of Motion for Summary Judgment;	0.83	210.00	174.30
Time log	7/19/2023, Bowen TV/McCall, Telecom : Telecom from Loyd Stewart re: Phase 1 Environmental Audit on McCall parcel;	0.03	210.00	6.30
Time log	7/19/2023, Jel Site Development, Inc. - BKTCY Case, Reviewed document(s): Reviewed email from Sharon Lauther re: Subpoena seeking public records; Prepared draft email to Attorneys requesting records; Drafted email to Sharon Lauther and April Brown re: records;	0.67	210.00	140.70
Time log	7/19/2023, Jel Site Development, Inc. - BKTCY Case, Telecom: Telecom to April Brown re: preparation of records requested in Subpoena;	0.13	210.00	27.30
Time log	7/19/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Drafting Motion For Summary Judgment; Began drafting Answer and Affirmative Defenses;	1.10	210.00	231.00
Time log	7/19/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Began drafting Answer to Complaint;	1.58	210.00	331.80
Time log	7/20/2023, Mohit v. COHC 2nd DCA 2022, Drafting document (s): Reviewed email from Court Administrator and Order denying Motion for Rehearing; Drafted email to City Commissioners re: status of case and Order;	0.37	210.00	77.70
Time log	7/20/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Completed drafting Answer; Drafted Waiver of Service;	4.20	210.00	882.00
Time log	7/24/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Drafted revisions to Answer and Affirmative Defenses; Filed Answer and Affirmative Defenses through the E Filing portal;	0.23	210.00	48.30
Time log	7/24/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Reviewed Section 57.105 (Attorney's fees; sanctions for raising unsupported claims or defenses), Florida Statutes; Reviewed Florida Bar Journal article on application of Section 57.105; Began drafting Motion for Sanctions under Section 57.105, Florida Statutes;	1.23	210.00	258.30
Time log	7/26/2023, Bowen TV/McCall, Correspondence: Reviewed email from Michael Triano re: Phase 1 Environmental Audit for McCall parcel; Drafted reply email to Michael Triano;	0.17	210.00	35.70
Time log	7/26/2023, Bowen TV/McCall, Correspondence: Telecom to Michael Triano re: Phase 1 Environmental Audits; Telecom to Attorney Michael Sznajstajler re: Audit and prospective Grants for remedial of former dry cleaning site; Drafted email to Michael Triano and Michael Sznajstajler;	0.48	210.00	100.80
Time log	7/26/2023, Bowen TV/McCall, Drafted document(s): Reviewed two (2) emails from Michael Triano re: User Questionnaires for Phase 1 Environmental Site Assessment; Telecoms to Michael Triano and Attorney Mark Lawson re: completion of User Questionnaires; Drafted three (3) User Questionnaires; Drafted email to Micheal Triano re: completed User Questionnaires;	1.35	210.00	283.50
Time log	7/26/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Drafting provisions for Motion For Summary Judgment;	1.55	210.00	325.50
Time log	7/27/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Completed drafting Motion for Summary Judgment and Exhibit A; Telecom to Attorney Linda Edwards re: background of federal court litigation; Filed Motion for Summary Judgment through E-Filing Portal; Drafted email to Benedict Mohit re: hearing time;	3.87	210.00	812.70

Item	Description	Qty	Unit cost	Price
Time log	7/28/2023, Bowen TV/McCall, Telecom : Telecom from Attorney Mark Lawson re: status of settlement negotiations with Defendant's counsel;	0.30	180.00	54.00
Time log	7/28/2023, JEL Site Development, Correspondence: Reviewed emails from Sharon Lauther and April Brown re: Letter of Completion and Letter of Credit; Drafted email to Attorney Rosemary Hayes re: Subpoena and requested documents;	0.48	210.00	100.80
Time log	7/28/2023, JEL Site Development, Correspondence: Reviewed email from Attorney Carly Newman re: Subpoena; Telecom to April Brown re: appearance at Bankruptcy hearing;	0.12	210.00	25.20
Time log	7/28/2023, Mohit v. COHC Circuit Court 2023, Drafting document(s) : Drafted Oral Argument for Motion For Summary Judgment;	1.25	210.00	262.50
			Total:	9600.60

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