

THE STATE OF SOUTH CAROLINA
In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY
Court of Common Pleas

The Honorable Courtney

Clyburn Pope, Circuit Court Judge

Lexington County

Case No. 2020-CP-32-04007

Appellate Case No. 2024-001585

1221 Bower, LLC Appellant

v.

Insurance Office of America, Inc., ...Respondent

RECORD ON APPEAL

Volume 4 of 4

Ms. Jenna Kay Depoy, Esquire
222 W COLEMAN BLVD., BUILDING 2
MT PLEASANT SC 29464

Mr. William Sylvester Hammett, III, Esquire
222 W. COLEMAN BLVD., BUILDING 2
MT. PLEASANT SC 29464

ATTORNEYS FOR APPELLANT

Mr. Benjamin Houston Joyce, Esquire
701 EAST BAY STREET, SUITE 411
CHARLESTON SC 29403

Mr. Ellis Reed-Hill Lesemann, Esquire
418 KING STREET
SUITE 301
CHARLESTON SC 29403

Mrs. Michelle Alyce Stewart, Esquire
418 KING STREET, SUITE 301
CHARLESTON SC 29403

ATTORNEYS FOR RESPONDENT

RECEIVED

May 16 2025

SC Court of Appeals

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Exhibit B

Affidavit of Attorneys' Fees and Invoices

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
COUNTY OF LEXINGTON	)	
	)	FOR THE ELEVENTH JUDICIAL CIRCUIT
INSURANCE OFFICE OF AMERICA,	)	
INC.,	)	Case No.: 2020-CP-32-04007
Plaintiff,	)	
	)	
vs.	)	
	)	AFFIDAVIT OF ATTORNEY'S FEES
1221 BOWER, LLC,	)	AND COSTS
	)	
Defendants.	)	

PERSONALLY, appeared before me the undersigned attorney, who states as follows:

1. I am over eighteen years of age.
2. I have been licensed to practice law in South Carolina since November 13, 2012.
3. I have been in private practice at Cobb Hammett Scapellato Andrews, LLC (f/k/a Cobb Dill & Hammett, LLC) for my entire legal career.
4. I am the attorney of record for the Defendant 1221 Bower, LLC in the above-captioned action and submit this affidavit in support of my client's claim for attorney fees incurred in prosecution of the above-referenced motion.
5. My client has incurred \$171,404.17 in attorney fees and costs related to this case. I have attended several depositions, hearings and trial, while prepared several pleadings in this action: Answer and Counterclaim, Motion for Summary Judgment, Memorandum in Support of Defendant's Motion for Summary Judgment, Motions to Compel Discovery, Defendant's Memorandum in Opposition to Plaintiff's Motion to Compel Discovery, Motion to Quash and Affidavit of Attorney's Fees. The attorney fees and costs are itemized in the attached billing history. See **Exhibit 1**.

6. A daily record of time necessarily expended in preparation of this case through February 1, 2024, has been maintained. The total amount of attorney's fees to date is One Hundred Sixty Thousand Three Hundred and Sixty-Five Dollars and 58/100 (\$160,365.58).
7. A record of costs, including service of process costs and filing fee costs has also been maintained. The total amount of costs to date is Eleven Thousand Eight Hundred and Forty Dollars and 45/100 (\$11,840.45).
8. The total amount of attorney's fees and costs to date One Hundred Seventy-Two Thousand Two Hundred Six Dollars and 03/100 Dollars (\$172,206.03).
9. The nature, extent and difficulty of the case, I believe this case is complicated by the sheer volume of issues Plaintiff created by breaching their lease by failing to terminate the Lease
10. I am experienced in this field and have prepared or reviewed all necessary pleadings to bring this matter to the presiding Judge.
11. This matter was tried in front of the Honorable Judge Clyburn-Pope and a seated twelve panel jury that started on January 22, 2024 and concluded on January 27, 2024.
12. The Court and counsel for the parties agreed to leave the issue of attorneys' fees to post-Jury results.
13. Based on the Jury Verdict Form, the time necessarily devoted to this case, the difficulty of services rendered, the results accomplished, the professional standing of counsel, the fees customarily charged in this area of litigation, the contractual obligation of the plaintiff to pay attorneys' fees and costs per the Lease (§§12.5 and 15.23 as further laid out in Defendant's Motion for Attorney Fees) and other criteria which have been held to be relevant in the setting and awarding of attorney's fees and costs, I request that the Court

grant judgment in favor of Defendant for these reasonable attorney's fees and costs and that the Plaintiff be required to pay the same.

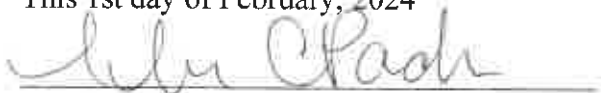
FURTHER, YOUR DEPONENT SAYETH NAUGHT.

Respectfully submitted,



Hal E. Cobb, Esq.
for Cobb Hammett Scapellato
Andrews, LLC
Attorney for Defendant

Sworn to and subscribed before me
This 1st day of February, 2024



Notary Public for the State of South Carolina

My Commission Expires: March 28, 2027

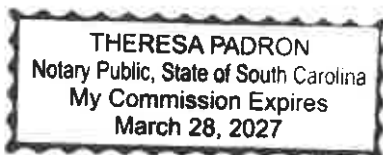


EXHIBIT 1

Billing History

See attached.

Invoice Date	Attorney Fees	Costs	
10/17/20	\$ 1,195.00		
2/2/21	\$ 1,310.00		
2/16/21	\$ 1,090.00		
3/1/21	\$ 525.00		
3/16/21	\$ 25.00		
4/1/21	\$ 50.00		
5/17/21	\$ 300.00		
6/17/21	\$ 532.50		
7/16/21	\$ 627.00		
9/1/21	\$ 690.00		
9/17/21	\$ 1,327.50		
10/1/21	\$ 1,032.00		
10/18/21	\$ 8,587.60	\$ 800.00	
11/2/21	\$ 4,624.00	\$ 1,302.90	
11/16/21	\$ 8,162.50	\$ 1,425.35	
12/1/21	\$ 1,192.00	\$ 1,331.55	
12/16/21	\$ 282.00	\$ 297.05	
1/4/22	\$ 2,754.50		
1/18/22	\$ 72.00	\$ 31.74	
2/1/22	\$ 542.00		
2/16/22	\$ 3,194.00		
3/1/22	\$ 1,760.00		
3/16/22	\$ 2,030.00		
4/1/22	\$ 374.00	\$ 315.15	
4/18/22	\$ 2,009.00		
5/2/22	\$ 587.50	\$ 392.20	
5/18/22	\$ 681.50		
6/1/22	\$ 446.50		
6/16/22	\$ 4,286.00		
7/18/22	\$ 7,498.00	\$ 39.80	
8/2/22	\$ 4,170.50		
8/16/22	\$ 836.50		
9/1/22	\$ 212.60		
10/17/22	\$ 542.00		
11/1/22	\$ 602.00		
11/16/22	\$ 1,242.50		
11/30/22	\$ 159.00	\$ 31.74	
1/3/23	\$ 141.00		
1/17/23	\$ 217.50		
2/1/23	\$ 607.50		
2/16/23	\$ 350.50		
3/1/23	\$ 686.50		
4/6/23	\$ 23.50		
4/20/23	\$ 47.00		
6/1/23	\$ 70.50		
6/15/23	\$ 378.50		
8/3/23	\$ 1,721.50		
8/16/23	\$ 817.50		
8/30/23	\$ 2,929.75		
9/15/23	\$ 2,807.50		
9/29/23	\$ 5,576.38	\$ 1,432.66	
10/13/23	\$ 13,375.50		
10/23/23	\$ 404.00		
11/1/23	\$ 120.00	\$ 350.00	
11/15/23	\$ 540.00		
12/1/23	\$ 495.50	\$ 75.40	
12/12/23	\$ 6,237.50	\$ 405.00	
12/22/23	\$ 5,540.00	\$ 99.49	
12/29/23	\$ 3,040.75	\$ -	
1/12/24	\$ 8,941.25	\$ 2,238.48	
1/30/24	\$ 39,546.25	\$ 664.58	
2/1/24	\$ 197.50	\$ 607.36	
	Attorney Fees	Costs	Total
Total	\$ 160,365.58	\$ 11,840.45	\$ 172,206.03



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Hal E. Cobb, Partner (SC/CO)
Michael H. Dill, Partner (SC)
William S. Hammett III, Partner (SC/GA)

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Victoria L. Hurse, Associate (SC)
Bryan A. Raymond, Partner (SC)

Stephanie M. Richards, Associate (SC)
Sean A. Scapellato, Partner (SC)
David F. Shymansky Jr., Associate (SC/MD)
Jeffrey A. Stocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date December 17, 2020
Invoice Number 24014

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 12/15/2020:

12/3/2020	Review letter form Ellis, email to AJ	H.E.C.	1.00	\$300.00
12/7/2020	Meeting with Ellis on Bower issue	H.E.C.	1.00	\$300.00
12/7/2020	Meeting with Hal Cobb and Opposing Counsel	L.S.D.	1.00	\$175.00
12/9/2020	Call with Ellis, call with AJ	H.E.C.	1.00	\$300.00
12/10/2020	Review of AJ's spreadsheet, email to Ellis and AJ	H.E.C.	0.40	\$120.00

TOTAL FEES 4.40 \$1,195.00

TOTAL COSTS \$0.00

TOTAL THIS INVOICE \$1,195.00

BALANCE FORWARD \$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE **\$1,195.00**

Trust Balance \$0.00

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Ryan C. Andrews, Partner (SC)
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Michael H. Dill, Partner (SC)
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David F. Shymansky Jr., Associate (SC/MD)
Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date

February 02, 2021

Invoice Number

24412

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 1/31/2021:

1/5/2021	Drafting Answer and Counterclaims	L.S.D.	2.00	\$200.00
1/6/2021	Edits to answer and counterclaim, email with AJ and call with AJ	H.E.C.	3.20	\$320.00
1/6/2021	Drafting Answer and Counterclaims	L.S.D.	1.60	\$160.00
1/7/2021	Finalize answer, counterclaims, emails with AJ, emails with Ellis	H.E.C.	2.00	\$200.00
1/7/2021	Draft letter responding to opposing counsel; prepare exhibits; correspond with Hal Cobb	L.S.D.	2.10	\$210.00
1/7/2021	Prepare Exhibits for Answer	L.S.D.	0.40	\$40.00
1/11/2021	Review and Convert all Discovery Requests	S.T.L.	0.50	\$50.00
1/20/2021	Phone call with AJ regarding fraud claim	L.S.D.	0.40	\$40.00
1/29/2021	Finalize RFP, INT, RTA response outlines, send to LSD for completion.	S.T.L.	0.90	\$90.00

TOTAL FEES

13.10

\$1,310.00

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$1,310.00

BALANCE FORWARD

\$1,195.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$2,505.00

Trust Balance

\$0.00

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ROA 1456

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Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

February 16, 2021
24527

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 2/15/2021:

2/1/2021	Correspond regarding discovery responses	L.S.D.	0.50	\$50.00
2/2/2021	Work through discovery responses; correspond with Client;	L.S.D.	4.60	\$460.00
2/3/2021	Complete Discovery Responses; meet with Shelby regarding production documents	L.S.D.	3.50	\$350.00
2/10/2021	Draft outlines for Discovery Requests	S.T.L.	1.10	\$110.00
2/15/2021	Drafting discovery requests	L.S.D.	1.20	\$120.00
TOTAL FEES			10.90	\$1,090.00

TOTAL COSTS	\$0.00
TOTAL THIS INVOICE	\$1,090.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$1,090.00</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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CD COBB DILL & &H HAMMETT, LLC

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

March 01, 2021
24855

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 2/28/2021:

2/18/2021	Drafting Discovery Requests.	L.S.D.	1.20	\$210.00
2/22/2021	Reviewing Client's redlines and revising discovery requests.	L.S.D.	0.70	\$122.50
2/23/2021	Review and revise discovery requests with AJ Leone	L.S.D.	1.10	\$192.50

TOTAL FEES	3.00	\$525.00
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TOTAL COSTS	\$0.00
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TOTAL THIS INVOICE	\$525.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$525.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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ROA 1458

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David F. Shymansky Jr., Associate (SC/MD)
Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

March 16, 2021
24804

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 3/15/2021:

3/8/2021	Emails with AJ	S.T.L.	0.20	\$25.00
TOTAL FEES			0.20	\$25.00
TOTAL COSTS				\$0.00
TOTAL THIS INVOICE				\$25.00
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
TOTAL AMOUNT DUE				\$25.00
Trust Balance				\$0.00

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Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

April 01, 2021
25009

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 3/31/2021:

3/16/2021	Emails with LSD & OC	S.T.L.	0.20	\$25.00
3/22/2021	Emails with OC	S.T.L.	0.20	\$25.00
TOTAL FEES			0.40	\$50.00

TOTAL COSTS	\$0.00
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TOTAL THIS INVOICE	\$50.00
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BALANCE FORWARD	\$25.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$75.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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ROA 1460

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Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

May 17, 2021
25557

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 5/15/2021:

5/13/2021	Emails with AJ, emails with opposing counsel on punch bowl and table, opposing counsel	H.E.C.	1.00	\$300.00
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TOTAL FEES	1.00	\$300.00
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$300.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$300.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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David F. Shymansky Jr., Associate (SC/MD)
Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

June 17, 2021
25956

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 6/15/2021:

6/7/2021	Review discovery requests and correspondences with opposing counsel; draft Rule 11 letter.	L.S.D.	0.40	\$90.00
6/8/2021	Revise Rule 11 Letter and circulate.	L.S.D.	0.20	\$45.00
6/8/2021	Email OC regarding overdue discovery responses, discuss with LSD	S.T.L.	0.20	\$25.00
6/8/2021	Follow up with Rule 11 Letter after no response	S.T.L.	0.10	\$12.50
6/10/2021	Review of second set of RFP and Rogs from 121 to IOA, review of IOA discovery reported and email with AJ	H.E.C.	1.20	\$360.00

TOTAL FEES	2.10	\$532.50
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TOTAL COSTS	\$0.00
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TOTAL THIS INVOICE	\$532.50
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$532.50</u>
--------------------------------	------------------------

<i>Trust Balance</i>	<i>\$0.00</i>
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Ryan C. Andrews, Partner (SC)
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Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

JULY 15, 2021
2022

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 7/15/2021:

7/1/2021	Call with AJ, emails with Ellis, call to Jamie Khan	H.E.C.	1.30	\$390.00
7/15/2021	Email with Ellis on supplemental discovery	H.E.C.	0.80	\$240.00
TOTAL FEES			2.10	\$630.00

TOTAL COSTS	\$0.00
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TOTAL THIS INVOICE	\$630.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED	\$3.00
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<u>TOTAL AMOUNT DUE</u>	<u>\$627.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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INVOICE

1221 Bower, LLC

Invoice Date September 01, 2021
Invoice Number 26644

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 8/31/2021:

8/19/2021	Initial review second response to discovery, establish deposition witness, and call with A.J.	H.E.C.	0.80	\$240.00
8/20/2021	Emails with OC	S.T.L.	0.20	\$25.00
8/20/2021	Emails with OC	S.T.L.	0.10	\$12.50
8/26/2021	Multiple emails with OC	S.T.L.	0.60	\$75.00
8/31/2021	Reviewed and analyzed complaint, answer and counterclaims, and plaintiff's reply to answer and counterclaims	P.K.	2.70	\$337.50

TOTAL FEES	4.40	\$690.00
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$690.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$690.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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ROA 1464

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



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INVOICE

1221 Bower, LLC

Invoice Date September 17, 2021
Invoice Number 27013

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 9/15/2021:

9/1/2021	Reviewed and analyzed Interrogatories and lease agreement	P.K.	1.50	\$187.50
9/1/2021	Reviewed [REDACTED] Letter, Prepare for Attorney Signature, Emails with Mediator's Office.	S.T.L.	0.20	\$20.00
9/2/2021	Review of case file for purposes of preparing deposition questions/script	P.K.	0.70	\$87.50
9/3/2021	Began drafting deposition script/outline	P.K.	0.30	\$37.50
9/3/2021	Delegate and advise Paige and Harrison on discovery organization, depo questions, etc.	S.T.L.	0.20	\$20.00
9/7/2021	Prepared for deposition of Kleen Sites Rep & IOA representative. Began cataloguing discovery.	P.K.	2.10	\$262.50
9/7/2021	Meet with Harrison regarding discovery	S.T.L.	0.50	\$50.00
9/8/2021	Meeting with Paige regarding discovery, review emails to be used for depo prep	S.T.L.	0.40	\$50.00
9/9/2021	Reviewed Kleen Sites report for purposes of drafting deposition questions	P.K.	0.40	\$50.00
9/10/2021	Discussion with Hal and Harrison regarding upcoming depositions and damages issues	P.K.	0.50	\$62.50
9/10/2021	Prepared questions and outline for deposition of Dave Dunnagan, Kleen Sites.	P.K.	0.50	\$62.50
9/14/2021	Continued drafting 30(b)(6) notice of deposition topics for IOA	P.K.	1.10	\$137.50
9/14/2021	Continued drafting questions for upcoming deposition of IOA representative	P.K.	0.90	\$112.50
9/15/2021	Continued drafting deposition questions for IOA representatives and Dave Dunnagan	P.K.	1.00	\$125.00
9/15/2021	Reviewed proposal for remediation, and post-remediation report from Kleen Sites and update deposition questions accordingly	P.K.	0.50	\$62.50

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: September 17, 2021
Invoice No.: 27013

TOTAL FEES	10.80	\$1,327.50
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE		\$1,327.50
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BALANCE FORWARD		\$0.00
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PAYMENTS APPLIED		
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<u>TOTAL AMOUNT DUE</u>		<u>\$1,327.50</u>
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<i>Trust Balance</i>		\$0.00
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Jeffrey A. Stocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

October 01, 2021
27240

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 9/30/2021:

9/16/2021	Continued drafting deposition questions and short discussion of same with Shelby Lott	P.K.	0.45	\$56.25
9/17/2021	Conference with team regarding status of case, including review of damages spreadsheet and discovery and call with Andrew Leone	P.K.	1.39	\$173.75
9/17/2021	Team meeting	T.K.	1.30	\$117.00
9/17/2021	Call with AJ and review on discovery and next steps for case	H.E.C.	1.20	\$360.00
9/17/2021	Case Status Update Meeting - Prepare for and Attend	S.T.L.	1.40	\$175.00
9/24/2021	Draft & Send Out NOD for Dave Dunnagan, with certificate of service, subpoena, and copy with cover letter to other counsel. Send certified & email the same. Receive confirmation email from Melanie Dunnagan confirming depo once more.	S.T.L.	0.70	\$87.50
9/28/2021	Reviewed mediation memo draft - made comments and suggestions	P.K.	0.50	\$62.50
TOTAL FEES			6.94	\$1,032.00

TOTAL COSTS \$0.00

TOTAL THIS INVOICE \$1,032.00

BALANCE FORWARD \$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE \$1,032.00

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INVOICE

1221 Bower, LLC

Invoice Date
 Invoice Number

October 18, 2021
 27348

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 10/15/2021:

10/4/2021	Reviewed deposition questions for Dave Dunnagan & began compiling exhibits for same	P.K.	2.40	\$300.00
10/5/2021	Reviewed, prepared, and email/mailed Notice of Deposition to opposing counsel and Mr. Leone.	K.A.	0.70	\$63.00
10/5/2021	Editing and resending NODs to opposing counsel	K.A.	0.50	\$45.00
10/5/2021	Reviewed Dave Dunnagan Deposition Exhibits with Atty. Cobb. Printed Exhibits for our physical file. Emailed Exhibits to Opposing Counsel.	K.A.	0.40	\$36.00
10/5/2021	Drafted 30(b)(6) Notice of Deposition, certificate of service and cover letter	P.K.	0.60	\$75.00
10/5/2021	Continued deposition preparation - cross referenced deposition script with exhibit information	P.K.	0.50	\$62.50
10/6/2021	Prepared binders for [REDACTED] of Dave Dunnagan and finalized deposition script. Prepared binders of pleadings, discovery, etc. for use in future.	P.K.	3.00	\$375.00
10/6/2021	Emailed amended Deposition Exhibits to opposing counsel	K.A.	0.10	\$9.00
10/6/2021	Prep for 1221 Bower - Dave Dunnagan depo	H.E.C.	3.00	\$900.00
10/7/2021	Dave Dunnagan deposition, including preparation of documents/communications with opposing counsel	P.K.	2.70	\$337.50
10/7/2021	Drafted Crissy Warner/Scott Berry deposition questions and began creating all inclusive PDF with cross-references	P.K.	1.10	\$137.50
10/7/2021	Deposition of Dave Dunnagan Kleen Sites	H.E.C.	2.50	\$750.00
10/8/2021	Organized and separated exhibits for court reporter	P.K.	0.20	\$25.00
10/8/2021	Deposition script for 10/14 deposition of crissy warner and scott berry	P.K.	0.40	\$50.00
10/8/2021	Continued drafting deposition questions & cross-	P.K.	0.60	\$75.00

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Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

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Date:

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	referencing exhibits			
10/11/2021	Reviewed subpoena responses from Angela Adleman and finalized scripts for deposition of Crissy Warner & Scott Berry	P.K.	1.90	\$237.50
10/11/2021	Reviewed email from Jan Hayward and created/shared a dropbox link with her for Dave Dunnagan exhibits	K.A.	0.10	\$9.00
10/11/2021	AJ Deposition prep	P.K.	1.70	\$212.50
10/11/2021	Deposition script updated and finalized exhibit PDF for Hal's review	P.K.	0.40	\$50.00
10/11/2021	Call with AJ on depo prep	H.E.C.	2.00	\$600.00
10/12/2021	Email to Jan Hayward requesting she create and send the zoom link for the Crissy Warner and Scott Berry depositions	K.A.	0.10	\$9.00
10/12/2021	Sending Jan Hayward revised Notice of Depositions	K.A.	0.10	\$9.00
10/12/2021	AJ Deposition	P.K.	3.30	\$412.50
10/12/2021	Prep for AJ Deposition and coordinated conference room for deposition	P.K.	0.50	\$62.50
10/12/2021	Dave Dunnagan Depo Invoice upload to Rocket Matter	T.K.	0.44	\$39.60
10/12/2021	Depo defense of AJ Leone	H.E.C.	3.00	\$900.00
10/12/2021	Sent exhibits for depositions of Crissy Warner and Scott Berry to opposing counsel.	K.A.	0.20	\$18.00
10/12/2021	Continued organization of exhibits for depositions on 10/14	P.K.	0.30	\$37.50
10/12/2021	Compiled and sent deposition exhibits for Hal's review	P.K.	0.30	\$37.50
10/13/2021	Updated deposition scripts to include 30(b)(6) topic related questions & finalized same.	P.K.	1.10	\$137.50
10/14/2021	Crissy Warner Deposition prep and attendance/discussion [REDACTED] for Scott Berry	P.K.	2.90	\$362.50
10/14/2021	Deposition of Scott Berry	P.K.	2.10	\$262.50
10/14/2021	Depo of C. Warner and depo of S. Berry, depo prep	H.E.C.	6.50	\$1,950.00
	TOTAL FEES		45.64	\$8,587.60
10/12/2021	Deposition invoice for David Dunnagan - INVOICE # 21739/Insurance Office of America vs 1221 Bower, LLC Deposition and Prep(4 hours @ \$200/hour)			\$800.00
	TOTAL COSTS			\$800.00
	TOTAL THIS INVOICE			\$9,387.60

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: October 18, 2021
Invoice No.: 27348

BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$9,387.60</u>
<i>Trust Balance</i>	<i>\$0.00</i>

[illegible]

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ROA 1470

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



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INVOICE

1221 Bower, LLC

Invoice Date November 02, 2021
Invoice Number 27537

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 10/31/2021:

10/16/2021	Catalog discovery, review Bates# 0001-809	H.B.	5.00	\$475.00
10/19/2021	Drafted cover letters and topics list for Subpoena Duces Tecum to Trinity Partners and Bowers COA.	P.K.	1.10	\$137.50
10/19/2021	Drafted mediation memo (picked up from Harrison's work) in preparation for 11/11 mediation.	P.K.	0.80	\$100.00
10/19/2021	1st & 2nd Response Verification for Defendant's Answers to Requests for Production	H.B.	3.00	\$285.00
10/20/2021	Compiled all documents for subpoena duces tecum to Bower Common Owners Association	P.K.	0.40	\$50.00
10/20/2021	Reviewed email from Atty Kregor completed research to determine what is needed for a Verification of Records Statement	K.A.	0.10	\$9.00
10/20/2021	Drafted Verification of Records Statement and sent to Atty. Kregor for review.	K.A.	0.40	\$36.00
10/20/2021	Finalized subpoena, cover letter, and forms for subpoena to Bower Commons Co-Owner's Association	P.K.	1.20	\$150.00
10/20/2021	Mailed Subpoena Duces Tecum to Bower Commons Co-Owners Association and emailed to Benjamin Joyce.	K.A.	0.40	\$36.00
10/20/2021	Review deposition transcripts from Court Reporter, pay invoice, download to G Drive	S.T.L.	0.40	\$50.00
10/20/2021	Discuss Subpoena to Trinity Partners with PK, email copy	S.T.L.	0.20	\$25.00
10/21/2021	Reviewed plaintiff's third supplemental discovery responses	P.K.	0.20	\$25.00
10/21/2021	Catalog new production from plaintiff. Bates# 0038-0061	H.B.	0.50	\$47.50
10/21/2021	Review Discovery Items Missing from Plaintiff's 1st & 2nd Sets of Production	H.B.	1.00	\$95.00

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Client: 1221 Bower, LLC

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10/22/2021	Prepare cover letter for subpoena duces tecum to IOA Properties III; email same to PK	C.T.	0.10	\$9.50
10/22/2021	Drafted exhibit to subpoena duces tecum to IOA Properties III, LLC	P.K.	0.60	\$141.00
10/22/2021	Begin First Draft of Mediation Memo	H.B.	2.00	\$190.00
10/25/2021	Continued drafting mediation memo [REDACTED]	P.K.	1.20	\$282.00
10/26/2021	Finalized and completed cover letter, Form 254, and exhibit for subpoena to IOA Properties III, LLC	P.K.	0.60	\$141.00
10/26/2021	Researched and discussed how to serve subpoena on dissolved entity, IOA Properties III, LLC	P.K.	0.40	\$94.00
10/26/2021	Discuss IOA Properties Subpoena with PK	S.T.L.	0.20	\$25.00
10/26/2021	Review Responses to 2nd set of interrogatories and 2nd set of request for production to Plaintiff	H.B.	1.00	\$95.00
10/27/2021	Researched and strategized whether to send subpoena to IOA Properties or send supplemental discovery requests to IOA	P.K.	0.50	\$117.50
10/27/2021	Drafted third set of requests for production to plaintiff	P.K.	0.70	\$164.50
10/27/2021	Drafted and revised definition section of third set of discovery	P.K.	0.40	\$94.00
10/27/2021	Drafted cover letter for thirds set of requests for production to IOA & continued drafting mediation memo	P.K.	1.60	\$376.00
10/27/2021	Discuss RFP & INT count to date with PK, read and confirm rules, review third set of request and make revisions	S.T.L.	0.70	\$87.50
10/28/2021	Continued drafting mediation memo, with [REDACTED]	P.K.	1.80	\$423.00
10/28/2021	Finalized discovery third set to IOA	P.K.	0.20	\$47.00
10/28/2021	Pulled and analyzed exhibits for mediation memo & continued drafting same	P.K.	1.40	\$329.00
10/28/2021	Review and revise final Third RFP Requests, discuss with PK & HEC, draft certificate of service, send out to all parties	S.T.L.	0.70	\$87.50
10/29/2021	Drafted and finalized mediation memo version 1 for Hal's review	P.K.	1.70	\$399.50
TOTAL FEES			30.50	\$4,624.00
10/20/2021	1221 Bower Invoice #5506			\$502.90
10/21/2021	David Dunnagan / Kleen Sites Geoservices, Inc. - Deposition Fee			\$800.00
TOTAL COSTS				\$1,302.90

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Invoice No.: 27537

TOTAL THIS INVOICE	\$5,926.90
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$5,926.90</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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INVOICE

1221 Bower, LLC

Invoice Date
 Invoice Number

November 16, 2021
 27707

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 11/15/2021:

11/1/2021	Read deposition of Scott Berry, noted lines for mediation memo and [REDACTED]	P.K.	0.80	\$188.00
11/1/2021	Reviewed invoice from Jan Hayward and paid	K.A.	0.20	\$18.00
11/1/2021	Read and took notes on Crissy Warner's deposition	P.K.	0.90	\$211.50
11/1/2021	Updated mediation memo with reference to the deposition transcripts & reviewed Dave Dunnagan's deposition transcript	P.K.	1.80	\$423.00
11/2/2021	Updated mediation memo with Hal's suggestions and depositions now available	P.K.	1.30	\$305.50
11/2/2021	Mediation Memo drafting	H.B.	0.70	\$66.50
11/3/2021	Continued revising and editing mediation memo, with focus on [REDACTED]	P.K.	1.00	\$235.00
11/3/2021	Began review of Plaintiff's fourth supplemental discovery responses	P.K.	0.20	\$47.00
11/4/2021	Pulled and labeled exhibits for mediation memo and sent same to Jamie Khan, mediator.	P.K.	1.10	\$258.50
11/4/2021	Continued catalogue and review of IOA's fourth supplemental discovery responses	P.K.	2.40	\$564.00
11/4/2021	Drafted deposition follow up questions for Angela Adleman	P.K.	0.30	\$70.50
11/5/2021	Prep for follow up for Angela Adlemans deposition	P.K.	0.80	\$188.00
11/5/2021	Deposition of Angela Adleman	P.K.	3.00	\$705.00
11/5/2021	Observe & take notes of Plaintiff's deposition of Angela	C.T.	2.50	\$237.50
11/5/2021	Deposition of Angela Adleman	H.E.C.	3.00	\$1,050.00
11/5/2021	Reviewed Management Agreements with SCS and CAMS & Co-Owners association referenced in	P.K.	0.20	\$47.00

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Client: 1221 Bower, LLC
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Date: November 16, 2021
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	exhibits			
11/8/2021	Continued cataloguing and reviewing 4th supplemental discovery responses	P.K.	1.70	\$399.50
11/9/2021	Correspondence with opposing counsel paralegal and AJ re damages spreadsheet native format	P.K.	0.30	\$70.50
11/9/2021	Research and conversation regarding obligations for production of documents in native format	P.K.	0.20	\$47.00
11/9/2021	Call with Jayme Khan in preparation for mediation	H.E.C.	0.70	\$245.00
11/10/2021	Preparation for mediation 11/11, including preparing exhibits	P.K.	0.40	\$94.00
11/11/2021	Mediation	P.K.	6.10	\$1,433.50
11/11/2021	Mediation [7 Hours total - deduct 7 hours]	H.E.C.	1.00	No Charge
11/12/2021	Began drafting motion for summary judgment and memo in support of same	P.K.	1.00	\$235.00
11/12/2021	Research on constructive fraud and available remedies; Draft memo regarding same	C.T.	3.10	\$294.50
11/12/2021	Research re constructive fraud cause of action, specifically whether omission can constitute a "representation" & correspondence with Hal re case law memo	P.K.	0.50	\$117.50
11/15/2021	Review and notation of Angela Adleman's deposition transcript	P.K.	1.00	\$235.00
11/15/2021	Began drafting fourth set of RFP's to IOA regarding corporate decision to "terminate" lease	P.K.	0.40	\$94.00
11/15/2021	Continued drafting motion for summary judgment and began memo in opposition to IOA's motion for summary judgment	P.K.	0.70	\$164.50
11/15/2021	Continued drafting standard of review section and outlining argument section in Motion for Summary Judgment	P.K.	0.50	\$117.50
TOTAL FEES			37.80	\$8,162.50
11/1/2021	Invoice #5526 from Jan Hayward for Depositions of Scott Berry and Crissy Warner			\$1,124.40
11/8/2021	One Copy Andrew Leone & Scanned Exhibits			\$300.95
TOTAL COSTS				\$1,425.35
TOTAL THIS INVOICE				\$9,587.85
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$9,587.85</u>

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: November 16, 2021
Invoice No.: 27707

<i>Trust Balance</i>	<i>\$0.00</i>
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INVOICE

1221 Bower, LLC

Invoice Date
 Invoice Number

December 01, 2021
 27587

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 11/30/2021:

11/16/2021	Correspondence with Ben Joyce regarding trial schedule	P.K.	0.20	\$47.00
11/18/2021	Reviewed emails from broker Brian Bailey regarding 2019 sale and correspondence with Ben Joyce regarding motion of continuance	P.K.	0.20	\$47.00
11/18/2021	Continued drafting Motion for Summary Judgment and discussion with Bryan Raymond regarding same	P.K.	1.10	\$258.50
11/18/2021	Drafted Motion for Continuance and sent Shelby same for review and filing	P.K.	0.80	\$188.00
11/18/2021	Review motion and order for continuance for PK	S.T.L.	0.40	\$50.00
11/18/2021	Drafted proposed order to continue trial	P.K.	0.70	\$164.50
11/18/2021	Finalized and filed Motion for Continuance & proposed order	P.K.	0.20	\$47.00
11/22/2021	Checked on status of motion for continuance	P.K.	0.10	\$23.50
11/29/2021	Checked status of motion for continuance	P.K.	0.10	\$23.50
11/29/2021	Discovery timeline and discussion with Hal regarding discovery requests	P.K.	0.20	\$47.00
11/30/2021	Continued drafting fourth set of requests for production to Plaintiff, specifically regarding decision to vacate premises, including discussion with Shelby Lott re same	P.K.	0.60	\$141.00
11/30/2021	Discussion with Hal regarding fourth set of discovery to IOA & motion for summary judgment argument and authorities	P.K.	0.30	\$70.50
11/30/2021	Discussion with Shelby re fourth set of discovery requests	P.K.	0.20	\$47.00
11/30/2021	Review Fourth Supplemental RFP Requests, draft cover letter, certificate of service, send to all parties	S.T.L.	0.30	\$37.50

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ROA 1477

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
 ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 3
Date: December 01, 2021
Invoice No.: 27887

	TOTAL FEES	5.40	\$1,192.00
.11/17/2021	Mediation		\$1,331.55
	TOTAL COSTS		\$1,331.55
	TOTAL THIS INVOICE		\$2,523.55
	BALANCE FORWARD		\$0.00
	PAYMENTS APPLIED		
	<u>TOTAL AMOUNT DUE</u>		<u>\$2,523.55</u>
	<i>Trust Balance</i>		<i>\$0.00</i>

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Jeffrey A. Stocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date

December 18, 2021

Invoice Number

28068

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 12/15/2021:

12/3/2021	Discussion with Shelby Lott re trial scheduling/preparation	P.K.	0.10	\$23.50
12/9/2021	Correspondence with Attorney Joyce re objection to subpoena	P.K.	0.30	\$70.50
12/9/2021	Read Plaintiff's responses to third set of RFPs in prep of drafting rule 11 letter to counsel	P.K.	0.20	\$47.00
12/10/2021	Began drafting rule 11 letter re RFPs third set	P.K.	0.30	\$70.50
12/14/2021	Rule 11 letter drafting continued	P.K.	0.30	\$70.50

TOTAL FEES

1.20

\$282.00

12/6/2021 Clark Bolen Invoice 75655 - Transcript

\$297.05

TOTAL COSTS

\$297.05

TOTAL THIS INVOICE

\$579.05

BALANCE FORWARD

\$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$579.05

Trust Balance

\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

January 04, 2022
28324

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 12/31/2021:

12/21/2021	Continued drafting Rule 11 letter to IOA	P.K.	0.50	\$117.50
12/22/2021	Finished draft of Rule 11 letter for Attorney Cobb's review	P.K.	0.70	\$164.50
12/22/2021	Read Plaintiff's motion for summary judgment	P.K.	0.10	\$23.50
12/22/2021	Rule 11 letter and MSJ discussion with Attorney Cobb, revision of same	P.K.	0.30	\$70.50
12/22/2021	Reviewed final version of rule 11 letter and sent same to IOA counsel	P.K.	0.60	\$141.00
12/22/2021	Prepared Rule 11 Letter for Certified Mailing. Call with Atty Kregor regarding same.	K.A.	0.30	\$28.50
12/22/2021	Discussion with Hal Cobb re trial schedule and prep	P.K.	0.20	\$47.00
12/22/2021	Added pleading points to motion for summary judgment and submitted same to Attorney Cobb	P.K.	0.70	\$164.50
12/23/2021	Revised motion for summary judgment to include additional damages and rent/additional rent	P.K.	0.30	\$70.50
12/23/2021	Continued drafting motion in support of summary judgment	P.K.	1.40	\$329.00
12/23/2021	Research of applicable case law for MSJ	P.K.	0.60	\$141.00
12/27/2021	Continued drafting memo in support of MSJ, focusing on declaratory judgment section.	P.K.	1.10	\$258.50
12/27/2021	Filed motion for summary judgment, continued writing memo in support, specifically citing all pages and lines of depo transcripts	P.K.	1.70	\$399.50
12/27/2021	Review of trial binder criteria and continued drafting of memo in support	P.K.	0.50	\$117.50
12/28/2021	Correspondence re motion for continuance	P.K.	0.20	\$47.00
12/28/2021	Drafted motion for continuance and proposed order	P.K.	0.30	\$70.50
12/28/2021	Reviewed and filed motion for continuance &	P.K.	0.30	\$70.50

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 3
Date: January 04, 2022
Invoice No.: 28324

	proposed order			
12/28/2021	Review of interrogatories re Rob Motley and Melissa Rudolph	P.K.	0.30	\$70.50
12/28/2021	Continued memo in support of motion for summary judgment	P.K.	0.80	\$188.00
12/28/2021	Began prepping trial binder/trial script	P.K.	0.20	\$47.00
12/29/2021	Began drafting subpoena to Rob Motley re deposition	P.K.	0.40	\$94.00
12/29/2021	Drafted subpoena and letter to Melissa Rudolph re deposition	P.K.	0.40	\$94.00
TOTAL FEES			11.90	\$2,754.50

TOTAL COSTS	\$0.00
TOTAL THIS INVOICE	\$2,754.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$2,754.50</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

January 18, 2022
28407

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 1/15/2022:

1/11/2022	Conversation with Shelby Lott re scheduling order and discovery responses from IOA	P.K.	0.20	\$47.00
1/11/2022	Email to other counsel regarding depositions, discuss with PK	S.T.L.	0.20	\$25.00
TOTAL FEES			0.40	\$72.00
1/10/2022	Filing Fee			\$31.74
TOTAL COSTS				\$31.74
TOTAL THIS INVOICE				\$103.74
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
TOTAL AMOUNT DUE				\$103.74
Trust Balance				\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

February 01, 2022
28608

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 1/31/2022:

1/18/2022	Correspondence with opposing counsel re motion hearing & deposition of Rob Motley and Melissa Rudolph	P.K.	0.40	\$94.00
1/18/2022	Motion for continuance correspondence and dates for Mr. Motleys deposition	P.K.	0.20	\$47.00
1/18/2022	Revised notice of deposition to Rob Motley to designate time and method.	P.K.	0.10	\$23.50
1/18/2022	Conversation with Shelby Lott re discovery outstanding & deposition of Rob Motley	P.K.	0.10	\$23.50
1/18/2022	Call with Court Reporter	S.T.L.	0.20	\$25.00
1/19/2022	Updated notice of deposition and discussion with Shelby Lott re obtaining Rob Motley's address	P.K.	0.20	\$47.00
1/21/2022	Conversation with Shelby Lott re Motion for Summary Judgment and deposition of Rob Motley	P.K.	0.10	\$23.50
1/24/2022	Deposition schedule	P.K.	0.10	\$23.50
1/27/2022	Conversation with Shelby Lott and Hal Cobb re motion to continue hearing and Rule 11 letter	P.K.	0.10	\$23.50
1/27/2022	Drafted Rule 11 letter, including review of correspondence and previous Rule 11 letter	P.K.	0.50	\$117.50
1/28/2022	Rule 11 letter sent to Hal and Shelby for review	P.K.	0.30	\$70.50
1/28/2022	Request for update on discovery outstanding	P.K.	0.10	\$23.50
TOTAL FEES			2.40	\$542.00

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$542.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 3
Date: February 01, 2022
Invoice No.: 28608

BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$542.00</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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INVOICE

1221 Bower, LLC

Invoice Date February 16, 2022
Invoice Number 28766

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 2/15/2022:

2/1/2022	Meeting with AJ regarding status of case and began drafting motion for continuance of hearings for February 15th	P.K.	0.50	\$117.50
2/1/2022	Drafted order for continuance	P.K.	0.20	\$47.00
2/1/2022	Finalized Order and Motion for Continuance with Shelby Lott	P.K.	0.30	\$70.50
2/1/2022	Finalized motion and order to continue hearing	P.K.	0.10	\$23.50
2/2/2022	Correspondence re trial date and scheduling order and discussion with Hal re same.	P.K.	0.20	\$47.00
2/2/2022	Drafted notice of appearance	P.K.	0.30	\$70.50
2/2/2022	Initial discovery review, emails with Ben and AJ	H.E.C.	1.30	\$455.00
2/3/2022	Drafted consent scheduling order	P.K.	0.40	\$94.00
2/3/2022	Updated scheduling order to comply with SC rules of civil procedure	P.K.	0.40	\$94.00
2/3/2022	Finalized and sent scheduling order to Ben Joyce, IOA	P.K.	0.20	\$47.00
2/4/2022	Review of IOA's responses to fourth set of discovery, including photos and research on persons cced on emails	P.K.	0.40	\$94.00
2/4/2022	Continued memo in support of motion for summary judgment and began deposition scripts for Motley & Rudolph	P.K.	0.60	\$141.00
2/4/2022	Transcript depo of Rob Motley	P.K.	0.50	\$117.50
2/8/2022	Trial Binder organization and set up - witness questioning portion	P.K.	0.30	\$70.50
2/8/2022	Research for memo in support of summary judgment and drafting of same	P.K.	0.50	\$117.50
2/8/2022	Continued trial binder and memo in support of motion for summary judgment	P.K.	0.50	\$117.50

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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2/8/2022	Began table of lease provisions for access at trial	P.K.	0.30	\$70.50
2/8/2022	Made comments on and sent Memo in Support of motion to Hal Cobb	P.K.	0.10	\$23.50
2/8/2022	Rob Motely deposition script	P.K.	0.50	\$117.50
2/9/2022	Trial Binder	P.K.	0.50	\$117.50
2/9/2022	Began Melissa Rudolph deposition script	P.K.	0.40	\$94.00
2/9/2022	Closing argument trial binder section	P.K.	0.60	\$141.00
2/9/2022	Research and saving of jury instructions	P.K.	0.70	\$164.50
2/9/2022	Discuss memo with Attorney Kregor.	B.A.R.	0.20	\$60.00
2/9/2022	Research for SC case on meaning of casualty	P.K.	0.30	\$70.50
2/9/2022	Continued drafting MSJ memo in support, specifically re case law and citations/deposition testimony	P.K.	0.60	\$141.00
2/10/2022	Memo in support of MSJ	P.K.	0.90	\$211.50
2/10/2022	Continued drafting both deposition scripts and memo	P.K.	0.40	\$94.00
2/10/2022	Research on "time is of the essence" alleged breach and defenses	P.K.	0.20	\$47.00
2/10/2022	Conversation with Tom Krahe re MSJ thoughts and arguments	P.K.	0.10	\$23.50
2/11/2022	Scheduling of depositions correspondence	P.K.	0.10	\$23.50
2/11/2022	Further deposition scheduling correspondence	P.K.	0.10	\$23.50
2/15/2022	Correspondence re deposition of Rob Motley with AJ Leone and discussion review of emails to date regarding same	P.K.	0.20	\$47.00

TOTAL FEES 12.90 **\$3,194.00**

TOTAL COSTS **\$0.00**

TOTAL THIS INVOICE **\$3,194.00**

BALANCE FORWARD **\$0.00**

PAYMENTS APPLIED

TOTAL AMOUNT DUE **\$3,194.00**

Trust Balance **\$0.00**

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

March 01, 2022
28923

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 2/28/2022:

2/4/2022	Continued adding to trial exhibit list, [REDACTED]	P.K.	0.30	\$70.50
2/16/2022	Revision of facts section of MSJ Memo	P.K.	0.40	\$94.00
2/16/2022	Discussion with Shelby Lott re Melissa Rudolph, Rob Motley Depositions and attempted contact with Plaintiff's paralegal	P.K.	0.20	\$47.00
2/16/2022	Filed Notice of Appearance, including research on rules for same	P.K.	0.20	\$47.00
2/16/2022	Explanation to Hal regarding relevancy of deposing Melissa Rudolph	P.K.	0.30	\$70.50
2/17/2022	Phone call with AJ regarding deposition of Melissa Rudolph, specifically support for need to depose specific reasons	P.K.	0.40	\$94.00
2/17/2022	Synopsis of Melissa Rudolph depo response to Ben Joyce	P.K.	0.10	\$23.50
2/17/2022	Drafted response to Ben Joyce re Melissa Rudolph	P.K.	0.20	\$47.00
2/17/2022	Trial Binder work, specifically on MSJ Memo and opening statement	P.K.	0.30	\$70.50
2/17/2022	Call with AJ, review on emails with opposing counsel on deposition	H.E.C.	1.00	\$350.00
2/21/2022	Deposition scripts and exhibits	P.K.	0.20	\$47.00
2/21/2022	Continued MSJ Memo, including review of discovery for memo & deposition script for Melissa and Rob	P.K.	0.60	\$141.00
2/21/2022	Casualty damage research on definition and interpretation	P.K.	0.10	\$23.50
2/22/2022	Discussion re deposition of Rob Motley script with Shelby and hal	P.K.	0.30	\$70.50
2/22/2022	Sent depo script for Rob Motley to AJ with	P.K.	0.10	\$23.50

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ROA 1487

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: March 01, 2022
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	synopsis of topics			
2/22/2022	Trial binder research on IOA office locations/size/revenue, and continued drafting opening and closing arguments	P.K.	0.40	\$94.00
2/24/2022	Follow up re Rob Motley depo with AJ	P.K.	0.10	\$23.50
2/25/2022	Rob Motley depo notice & script exhibit insertion	P.K.	0.30	\$70.50
2/25/2022	Review of damages spreadsheet for purposes of inserting into Trial Binder & motion memo in support	P.K.	0.30	\$70.50
2/25/2022	Continued spreadsheet review and trial binder table of lease provisions for efficient reference at trial	P.K.	0.20	\$47.00
2/25/2022	Discussion with Shelby Lott re opening statement strategy	P.K.	0.20	\$47.00
2/25/2022	Continued trial binder exhibits, including specifically photographs taken during moveout	P.K.	0.30	\$70.50
2/25/2022	Categorized Plaintiff's responses to D's Fourth Set of Requests for Production and saved same individually, and inserted into the Rob Motley deposition script	P.K.	0.40	\$94.00
2/28/2022	Review of date of deposition and scheduling time frame regarding same for script and exhibits	P.K.	0.10	\$23.50

TOTAL FEES	7.00	\$1,760.00
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$1,760.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$1,760.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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INVOICE

1221 Bower, LLC

Invoice Date
 Invoice Number

March 16, 2022
 29172

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 3/15/2022:

3/1/2022	Notice of Deposition to Rob Motley; Discussion regarding third set of discovery and Melissa Rudolph	P.K.	0.20	\$47.00
3/1/2022	Continued drafting Rob Motley deposition questions and exhibits, specifically regarding Melissa's involvement and relocation efforts	P.K.	0.30	\$70.50
3/1/2022	Searched production for direct communications between Rob Motley and Melissa Rudolph	P.K.	0.20	\$47.00
3/1/2022	Review of AJ's comments on Rob Motley Deposition script	P.K.	0.20	\$47.00
3/1/2022	Reviewed and signed subpoena to Rob Motley and reviewed Ben's acceptance of service	P.K.	0.10	No Charge
3/1/2022	Continued drafting deposition questions for Rob Motley specifically including and integrating AJ's comments	P.K.	0.40	\$84.00
3/1/2022	Continued drafting rob motley deposition questions	P.K.	0.10	\$23.50
3/1/2022	Draft and send Notice of Deposition, Subpoena and Acceptance of Service to OC	S.T.L.	1.00	\$125.00
3/3/2022	Continued pulling exhibits for Rob Motley's deposition, specifically emails per AJ's requests	P.K.	0.50	\$117.50
3/7/2022	Correspondence re deposition exhibits and production of same to deponent	P.K.	0.10	\$23.50
3/7/2022	Continued deposition exhibits, specifically finding emails referenced by AJ in his proposed questions in bates stamp format	P.K.	0.50	\$117.50
3/7/2022	Continued drafting deposition script for Rob Motley	P.K.	0.20	\$47.00
3/8/2022	Finished Rob Motley deposition script, with specific time to find exhibits requested by AJ Leone	P.K.	0.50	\$117.50
3/8/2022	Review of deposition script in preparation for Thursday deposition	P.K.	0.30	\$70.50

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Client: 1221 Bower, LLC
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March 16, 2022
29172

3/8/2022	Defendants supplemental responses to First Set of Requests for Production, Marcus and Millichap	P.K.	0.10	\$23.50
3/8/2022	Began review of 5th supplemental responses	P.K.	0.10	\$23.50
3/9/2022	Review of AJ's email notes on Fifth Supplemental Responses to first set of discovery and contemplation of adding to deposition script for tomorrow	P.K.	0.20	\$47.00
3/9/2022	Correspondence with Ben Joyce regarding missing supplemental answers to Third Set of RFPS	P.K.	0.10	\$23.50
3/9/2022	Updated deposition script to include emails between real estate advisors and IOA reps regarding 5th amendment	P.K.	0.30	\$70.50
3/9/2022	Continued deposition script	P.K.	0.40	\$94.00
3/9/2022	Discussion with Attorney Raymond re deposition strategy	P.K.	0.20	\$47.00
3/9/2022	Extracted pages from Mold inspection reports	P.K.	0.10	\$23.50
3/9/2022	Exhibits to Shelby Lott for submission to Court Reporter	P.K.	0.20	\$47.00
3/9/2022	Printed and reviewed deposition questions	P.K.	0.30	\$70.50
3/9/2022	Review of deposition transcript, addition of opening and closing statements regarding SC rules of civil procedure requirements	P.K.	0.30	\$70.50
3/10/2022	Reviewed deposition transcript	P.K.	0.20	\$47.00
3/10/2022	Depo prep and review	P.K.	0.20	\$47.00
3/10/2022	Sent zoom link and passcode to AJ and Hal Cobb	P.K.	0.10	No Charge
3/10/2022	Deposition of Robert Motley, including zoom prep, exhibit prep beforehand	P.K.	1.60	\$376.00
3/10/2022	Post deposition consult with AJ	P.K.	0.20	\$47.00
3/10/2022	Depo on Rob Motley [NO CHARGE]	H.E.C.	2.00	No Charge
3/15/2022	Emails with OC	S.T.L.	0.20	\$25.00

TOTAL FEES**11.40****\$2,030.00****TOTAL COSTS****\$0.00****TOTAL THIS INVOICE****\$2,030.00****BALANCE FORWARD****\$0.00****PAYMENTS APPLIED****TOTAL AMOUNT DUE****\$2,030.00**

Cobb Dill & Hammett, LLC
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Mount Pleasant, SC 29464
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Hal E. Cobb, Partner (SC/CO)
Michael H. Dill, Partner (SC)
William S. Hammett III, Partner (SC/GA)

Stefanie L. Huffer, Associate (SC)
Victoria L. Hurse, Associate (SC)
Bryan A. Raymond, Partner (SC)

Stephanie M. Richards, Associate (SC)
Sean A. Scapellato, Partner (SC)
David F. Shymansky Jr., Associate (SC/MD)
Jeffrey A. Slocum Jr., Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

April 01, 2022
29359

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 3/31/2022:

3/16/2022	Draft Motion/Order for Continuance	S.T.L.	0.20	\$25.00
3/21/2022	Review of Plaintiff's 6th supplemental responses to D's first set of requests for production	P.K.	0.30	\$70.50
3/21/2022	Discussion with Shelby Lott re Melissa Rudolph subpoena and address & 6th set of supplemental discovery	P.K.	0.20	\$47.00
3/23/2022	Correspondence regarding Melissa Rudolph deposition availability	P.K.	0.10	\$23.50
3/23/2022	Consult with Shelby re scheduling order need	P.K.	0.20	No Charge
3/23/2022	Conversation with Shelby Lott re deposition schedule April 4 or 6	P.K.	0.10	\$23.50
3/25/2022	Prepare for April 6 Depo, send out NOD, contact court reporter	S.T.L.	1.10	\$137.50
3/28/2022	Correspondence regarding Melissa Rudolph deposition with Ann Cuniffe, Hal Cobb, Shelby Lott	P.K.	0.10	\$23.50
3/28/2022	Correspondence with Mary re bill for Rob Motley Deposition	P.K.	0.10	\$23.50

TOTAL FEES	2.40	\$374.00
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3/28/2022	Janice Hayward; Invoice 5691	\$315.15
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TOTAL COSTS	\$315.15
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TOTAL THIS INVOICE	\$689.15
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 3
Date: April 01, 2022
Invoice No.: 29359

TOTAL AMOUNT DUE

\$689.15

Trust Balance

\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

April 18, 2022
29501

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 4/15/2022:

4/4/2022	Began Melissa Rudolph deposition script	P.K.	0.50	\$117.50
4/4/2022	Melissa Rudolph deposition exhibit gathering and continued drafting deposition questions	P.K.	0.60	\$141.00
4/4/2022	Continued working on deposition script	P.K.	0.20	\$47.00
4/4/2022	Continued deposition script	P.K.	0.30	\$70.50
4/4/2022	Sent depo script to AJ and correspondence regarding start time and NOD	P.K.	0.20	\$47.00
4/5/2022	Discussion with Hal regarding witness questioning strategy and visual exhibits	P.K.	0.20	\$47.00
4/5/2022	Organized and labeled all exhibits for deposition, continued drafting deposition questions	P.K.	0.90	\$211.50
4/5/2022	Review of AJ edits to deposition transcript	P.K.	0.20	\$47.00
4/5/2022	Incorporated AJ's questions into the deposition script	P.K.	0.60	\$141.00
4/5/2022	Printed and organized deposition materials	P.K.	0.20	\$47.00
4/5/2022	Organize exhibits for Melissa Rudolph deposition	S.T.L.	0.30	\$37.50
4/6/2022	Sent link and exhibits to hal for zoom depo	P.K.	0.20	No Charge
4/6/2022	Review of deposition transcript for Melissa Rudolph	P.K.	0.20	\$47.00
4/6/2022	Set up computer for deposition	P.K.	0.30	\$70.50
4/6/2022	Deposition of Melissa Rudolph	P.K.	1.30	\$305.50
4/6/2022	Melissa Rudolph deposition	H.E.C.	1.00	\$350.00
4/11/2022	Trial Binder work and research on SC law determining meaning of "fire or other casualty"	P.K.	0.50	\$117.50
4/11/2022	Review of photo moving out of premises.	P.K.	0.20	\$47.00
4/13/2022	Research for SC case law on "casualty or otherwise" meaning	P.K.	0.30	\$70.50
4/14/2022	Discussion with clerk Caroline regarding pleadings binder	P.K.	0.20	\$47.00
TOTAL FEES			8.40	\$2,009.00

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ROA 1493

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Page:

2 of 3

Date:

April 18, 2022

Invoice No.:

29501

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$2,009.00

BALANCE FORWARD

\$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$2,009.00

Trust Balance

\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

May 02, 2022
29709

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 4/30/2022:

4/18/2022	Scheduled Motion Hearing on MSJ for May 19th	P.K.	0.10	\$23.50
4/18/2022	Review of current memo in support of motion for summary judgment to begin adding more relevant case law	P.K.	0.40	\$94.00
4/19/2022	Directions to Clerk Lista regarding discovery binder	P.K.	0.20	\$47.00
4/19/2022	Began file of all referenced law for MSJ, case law readily available to present to Judge if needed	P.K.	0.60	\$141.00
4/19/2022	Continued folder of case law for MSJ	P.K.	0.20	\$47.00
4/19/2022	Continued saving relevant case law and double-checking same	P.K.	0.30	\$70.50
4/19/2022	Continued contract interpretation section of MSJ	P.K.	0.20	\$47.00
4/19/2022	Continued work on trial binder	P.K.	0.30	\$70.50
4/25/2022	Consult with Tom Krahe and Shelby regarding MSJ arguments and hearing	P.K.	0.20	\$47.00

TOTAL FEES

2.50 \$587.50

4/22/2022	Janice Hayward, LLC - Deposition of Melissa Rudolph			\$196.10
4/29/2022	Deposition Invoice 5741 - Janice D. Hayward, LLC			\$196.10

TOTAL COSTS

\$392.20

TOTAL THIS INVOICE

\$979.70

BALANCE FORWARD

\$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$979.70

Trust Balance

\$0.00

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ROA 1495

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

May 18, 2022
30034

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 5/15/2022:

5/4/2022	Review digital copies of pleadings and discovery to ensure all are included in file; process and index for Attorney Huffer	K.T.	0.60	\$72.00
5/4/2022	Continued drafting memo in support of motion for summary judgment	P.K.	0.50	\$117.50
5/5/2022	Scheduling correspondence with S. Lott regarding hearing	P.K.	0.10	\$23.50
5/5/2022	Memo in support of motion for summary judgment, specifically damages section and review and listing of case law	P.K.	0.40	\$94.00
5/10/2022	Instructions to clerk to draft motion for continuance of motion for summary judgment	P.K.	0.20	\$47.00
5/10/2022	Consult with Ryan Jones regarding motion for continuance	P.K.	0.10	\$23.50
5/10/2022	Consent order for continuance/motion for continuance	P.K.	0.50	\$117.50
5/10/2022	Review and revise motion for continuance and order. Email same to Paige Kregor.	S.L.H.	0.40	\$116.00
5/10/2022	Filed motion for continuance	P.K.	0.20	\$47.00
5/13/2022	Motion for continuance status update from Shelby and to Hal	P.K.	0.10	\$23.50
TOTAL FEES			3.10	\$681.50

TOTAL COSTS	\$0.00
TOTAL THIS INVOICE	\$681.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$681.50</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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ROA 1496

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

June 01, 2022
30160

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 5/31/2022:

5/18/2022	Discussion with clerk regarding case strategy	P.K.	0.10	\$23.50
5/25/2022	Trial prep, discovery binder, and instructions to clerk	P.K.	0.20	\$47.00
5/31/2022	Meeting with Hal and Ryan regarding Trial Prep	P.K.	0.50	\$117.50
5/31/2022	instructions to clerk regarding trial binder	P.K.	0.30	\$70.50
5/31/2022	Trial Binder work and conversation with clerk; memo in support of motion for summary judgment	P.K.	0.50	\$117.50
5/31/2022	Organized plaintiffs production	P.K.	0.30	\$70.50

TOTAL FEES

1.90 \$446.50

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$446.50

BALANCE FORWARD

\$681.50

PAYMENTS APPLIED

\$681.50

TOTAL AMOUNT DUE

\$446.50

Trust Balance

\$0.00

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ROA 1497

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

June 16, 2022
30313

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 6/15/2022:

6/1/2022	Review of legal principles Ryan Jones drafted	P.K.	0.20	\$47.00
6/1/2022	Instructions to clerk regarding legal analysis section of trial binder	P.K.	0.10	\$23.50
6/1/2022	Discovery Binder	P.K.	0.30	\$70.50
6/2/2022	wrote memo on motion for summary judgement on the doctrine of ejusdem generis and South Carolina interpretation of casualty	R.J.	2.50	\$237.50
6/2/2022	compiled a list of prospective jury charges for trial	R.J.	1.00	\$95.00
6/2/2022	reviewed the law from the prospective jury charges for relevancy and cleaned it up for trial binder	R.J.	1.20	\$114.00
6/3/2022	Consult with Hal regarding [REDACTED]	P.K.	0.10	\$23.50
6/3/2022	researched binding case law for motion for summary judgement	R.J.	1.70	No Charge
6/3/2022	added relevant facts to the trial binder law to form the application section	R.J.	0.70	\$66.50
6/6/2022	Motion for summary judgment; memo in support drafting	P.K.	1.40	\$329.00
6/6/2022	Further drafting of memo in support of Motion for Summary Judgment	P.K.	0.40	\$94.00
6/6/2022	Located Exhibit 1 to Memo in Support	P.K.	0.10	\$23.50
6/6/2022	Finished memo in support of motion for summary judgment	P.K.	0.80	\$188.00
6/6/2022	continued working on trial binder law application to the determinative facts of the case	R.J.	1.30	\$123.50
6/7/2022	Review of Hal's notes on memo in support of motion for summary judgment	P.K.	0.50	\$117.50
6/7/2022	Continued drafting MSJ and reviewing Hal's edits, specifically regarding comments on [REDACTED]	P.K.	0.20	\$47.00
6/7/2022	Review and finalize MSJ motion in support	H.E.C.	1.00	\$350.00
6/7/2022	started writing list of questions for witnesses at trial	R.J.	0.50	\$47.50
6/8/2022	Finalized memo in support of motion for summary judgment	P.K.	0.30	\$70.50
6/8/2022	Continued drafting opening statement	P.K.	0.20	\$47.00

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ROA 1498

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date:
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June 16, 2022
30313

6/8/2022	reviewed and red-lined memo in support of motion for summary judgement	R.J.	0.60	\$57.00
6/8/2022	continued adding witness questions - Dunnagan	R.J.	0.80	\$76.00
6/8/2022	continued adding witness questions - Dunnagan	R.J.	1.30	\$123.50
6/8/2022	started witness questioning for trial - Berry	R.J.	1.20	\$114.00
6/9/2022	Final review of memo in support, sent same to Shelby	P.K.	0.30	\$70.50
6/9/2022	Review of Memo with shelby lott	P.K.	0.10	\$23.50
6/9/2022	continued Berry witness questions for trial	R.J.	0.50	\$47.50
6/9/2022	continued Berry witness questions for trial	R.J.	0.50	\$47.50
6/9/2022	continued witness questions (Berry) for trial	R.J.	0.40	\$38.00
6/9/2022	continued witness questions for trial	R.J.	0.40	\$38.00
6/10/2022	Dave Dunnagan direct examination script began drafting	P.K.	0.80	\$188.00
6/10/2022	Opening Statement	P.K.	0.20	\$47.00
6/10/2022	Final review of Memo in support and sent final version to shelby for filing	P.K.	0.30	\$70.50
6/10/2022	Case law cited in MSJ	P.K.	0.10	\$23.50
6/10/2022	Finalized memo exhibits with Shelby Lott	P.K.	0.20	No Charge
6/10/2022	Review and revise Memo in Support of MSJ, discuss with PK, review deposition transcripts, create exhibits A-N for Memo	S.T.L.	2.10	\$262.50
6/13/2022	Discussion re questioning of Dave Dunnagan with clerk, irrelevant lines of questioning	P.K.	0.10	\$23.50
6/13/2022	Preparation for motion for summary judgment hearing / pleadings binder and discussion with Lott about docs needed	P.K.	0.10	\$23.50
6/13/2022	Continued work on trial binder	P.K.	0.30	\$70.50
6/14/2022	Meeting with Hal Cobb, Clerk Jones regarding trial prep needs	P.K.	0.60	\$141.00
6/15/2022	Review of affidavit filed by Plaintiff regarding broom clean condition photographs	P.K.	0.20	\$47.00
6/15/2022	downloaded, printed, and placed into pleadings binder IOA's MSJ and Exhibits	R.J.	0.40	\$38.00
6/15/2022	Review of plaintiffs memo in support of summary judgment	P.K.	0.30	\$70.50
6/15/2022	Review Memo in Support, discuss case strategy for MSJ hearing with HEC & PK	S.T.L.	0.60	\$75.00
6/15/2022	Review and prep for MSJ	H.E.C.	1.30	\$455.00
TOTAL FEES			28.20	\$4,286.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 3 of 4
Date: June 16, 2022
Invoice No.: 30313

TOTAL COSTS	\$0.00
TOTAL THIS INVOICE	\$4,286.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$4,286.00</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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Stephanie M. Richards, Associate (SC)
Sean A. Scapellato, Partner (SC)
David F. Shymansky Jr., Associate (SC/MD)
Deanne Grey, Associate (SC)

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

July 18, 2022
30728

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 7/15/2022:

6/16/2022	crafted timeline of events from depositions and evidence for MSJ hearing	R.J.	1.60	\$152.00
6/16/2022	printed sections of the lease for MSJ hearing	R.J.	0.20	\$19.00
6/16/2022	Motion for Summary Judgement hearing, early prep	H.E.C.	2.60	\$910.00
6/16/2022	Call with Shelby Lott re motion hearing outcome	P.K.	0.20	\$47.00
6/20/2022	Correspondence with S. Lott and H. Cobb regarding motion for summary judgment outcome/trial strategy	P.K.	0.30	\$70.50
6/20/2022	Review of subpoena to insurance company sent by IOA	P.K.	0.20	\$47.00
6/21/2022	finished drafting Berry witness questions for trial	R.J.	0.70	\$66.50
6/21/2022	started drafting Addleman witness questions for trial	R.J.	1.80	\$171.00
6/21/2022	Trial prep consult with clerk; review of needed discovery binder	P.K.	0.20	\$47.00
6/22/2022	continued crafting Adleman witness questions for trial	R.J.	0.70	\$66.50
6/22/2022	continued Adleman witness questions for trial	R.J.	0.80	\$76.00
6/22/2022	continued Adleman witness questions for trial	R.J.	0.30	\$28.50
6/22/2022	continued Adleman witness questions for trial	R.J.	0.60	\$57.00
6/23/2022	Discovery binders - Chao and Associates	P.K.	0.30	\$70.50
6/23/2022	Further review and organization of Chao and Associates discovery for trial ; organization and analyzed discovery documents completed and printed thus far	P.K.	0.60	\$141.00
6/23/2022	continued 1221 Bower Adleman questions for trial	R.J.	0.40	\$38.00
6/23/2022	started crafting master timeline including sources for trial use (1st set of interrogatories)	R.J.	0.90	\$85.50

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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30728

6/23/2022	continued master timeline including sources for trial use (1st set of interrogatories)	R.J.	0.80	\$76.00
6/23/2022	continued master timeline including sources for trial use (1st set of interrogatories)	R.J.	0.30	\$28.50
6/23/2022	continued master timeline including sources for trial use (1st set of interrogatories)	R.J.	0.70	\$66.50
6/24/2022	Trial binder, specifically adding Trinity Partners exhibit of layout clearly laying out square footage of the premises	P.K.	0.40	\$94.00
6/27/2022	continued master timeline for use at trial (Adleman deposition)	R.J.	1.20	\$114.00
6/28/2022	Trial Prep; Follow up regarding outstanding answers to Third Set of Discovery	P.K.	0.80	\$188.00
6/28/2022	Rule 11 Letter follow up to Ben Joyce re Third Set of RFPs	P.K.	0.20	\$47.00
6/28/2022	continued drafting witness questions (Adleman) for trial	R.J.	0.40	\$38.00
6/29/2022	Continued script and sent same to hal	P.K.	0.20	\$47.00
6/29/2022	continued master timeline for use at trial (Adleman deposition)	R.J.	1.30	\$123.50
6/29/2022	continued master timeline for use at trial (Adleman depo)	R.J.	1.70	\$161.50
6/30/2022	organized deposition folder to be more readable and accessible	R.J.	0.40	\$38.00
6/30/2022	continued 1221 Bower master timeline (analyzing Adleman subpoena responses)	R.J.	2.80	\$266.00
6/30/2022	continued 1221 Bower master timeline (Adleman subpoena responses)	R.J.	0.40	\$38.00
6/30/2022	continued 1221 Bower master timeline (Marcus & Millichap production file)	R.J.	2.30	\$218.50
7/5/2022	Correspondence regarding depo script for Dave Dunnagan	P.K.	0.10	\$23.50
7/5/2022	Crissy Warner questioning at Trial	P.K.	1.00	\$235.00
7/5/2022	Continued questioning of Crissy Warner; discussion of need for Motion to Compel discovery for 3rd set of requests for production	P.K.	0.30	\$70.50
7/5/2022	Continued Trial script incorporating Crissy and Dave's testimony	P.K.	0.40	\$94.00
7/6/2022	Demonstrative Exhibits proposed to Hal and Shelby; continued exhibit list for trial	P.K.	0.50	\$117.50
7/6/2022	Continued trial binder; specifically exhibit and opening argument; specifying demonstratives to use in same	P.K.	0.20	\$47.00
7/7/2022	Correspondence re demonstrative exhibits at trial	P.K.	0.10	\$23.50
7/8/2022	Drafted Motion to Compel responses to Third Set	P.K.	0.40	\$94.00

Cobb Dill & Hammett, LLC
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Mount Pleasant, SC 29464
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date:
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July 18, 2022
30728

	of Requests for Production			
7/8/2022	Deposition of AJ Leone review	P.K.	0.30	\$70.50
7/8/2022	Consult with S. Lott re trial preparation	P.K.	0.40	\$94.00
7/8/2022	Subpoena Duces Tecum to IOA Properties III, LLC	P.K.	0.40	\$94.00
7/8/2022	Continued drafting motion to compel	P.K.	0.10	\$23.50
7/8/2022	Emails with Shelby Lott regarding subpoena to IOA Properties III, LLC	P.K.	0.10	\$23.50
7/8/2022	Discuss matter with PK, review discovery, emails with other counsel paralegal	S.T.L.	0.90	\$112.50
7/8/2022	Review emails, discuss with PK, pull transcript	S.T.L.	0.30	\$37.50
7/11/2022	Drafted Motion to Compel and combed through correspondence for timeline; continued subpoena to IOA Properties III, LLC	P.K.	0.70	\$164.50
7/11/2022	Labeled all exhibits to Motion to Compel and analyzed same for accuracy	P.K.	0.20	\$47.00
7/11/2022	Finished Motion to Compel	P.K.	0.30	\$70.50
7/11/2022	Subpoena topics to IOA Properties III, LLC	P.K.	0.20	\$47.00
7/11/2022	Added [REDACTED] to the Motion to Compel	P.K.	0.30	\$70.50
7/11/2022	Checked on Ryan's status on trial binder	P.K.	0.10	\$23.50
7/11/2022	cleaned up law analysis section in trial binder	R.J.	0.40	\$38.00
7/11/2022	reviewed Leone deposition transcript, looking to draft witness questions for trial	R.J.	1.50	\$142.50
7/11/2022	researched IOA and its services for layman's use surrounding trial	R.J.	0.40	\$38.00
7/11/2022	continued drafting IOA Prop III subpoena duces tecum topics	R.J.	1.00	\$95.00
7/12/2022	continued creating master timeline for trial prep (Warner depo)	R.J.	1.90	\$180.50
7/12/2022	continued creating master timeline for trial prep (Berry depo)	R.J.	0.70	\$66.50
7/12/2022	continued creating master timeline for trial (Berry depo)	R.J.	0.80	\$76.00
7/12/2022	Motion to Compel labeled exhibits for filing	P.K.	0.20	\$47.00
7/12/2022	MTC subpoena review, review of discovery and email to AJ	H.E.C.	0.60	\$210.00
7/13/2022	Filed Motion to Compel responses to Third Set of Requests for Production	P.K.	0.20	\$47.00
7/13/2022	Review of correspondence from IOA counsel regarding non-response from Amguard & consult with Shelby re courtesy notice of MTC to opposing counsel	P.K.	0.20	\$47.00
7/13/2022	Subpoena Duces Tecum to IOA Properties III, LLC	P.K.	0.30	\$70.50

Cobb Dill & Hammett, LLC
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Client: 1221 Bower, LLC
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July 18, 2022
30728

7/13/2022	drafted IOA tenant estoppel certificate argument	R.J.	0.60	\$57.00
7/13/2022	continued master timeline for trial prep (Dunnagan depo)	R.J.	0.20	\$19.00
7/13/2022	continued master timeline for trial prep (Dunnagan depo)	R.J.	0.70	\$66.50
7/13/2022	continued master timeline for trial prep (Rudolph depo)	R.J.	0.80	\$76.00
7/13/2022	started compiling all timeline info into one document with sources	R.J.	1.80	\$171.00
7/14/2022	Review of timeline; [REDACTED] [REDACTED] continued working on trial binder	P.K.	0.40	\$94.00
7/14/2022	continued compiling all timeline info into one document with sources	R.J.	2.10	\$199.50
7/14/2022	made notes on Warner deposition for 1221 Bower trial questions to add new info and strategy	R.J.	0.20	\$19.00
7/14/2022	worked on 1221 Bower witness questions (Warner and Berry) with better info	R.J.	1.50	\$142.50
7/14/2022	continued trial witness questions (Berry and Adleman) with better info	R.J.	2.30	\$218.50
7/14/2022	worked on trial binder and witness strategy, including conversation and discussion with Paige concerning timeline	R.J.	0.90	\$85.50
7/14/2022	Meeting with clerk regarding trial prep	P.K.	0.30	\$70.50

TOTAL FEES

53.60 **\$7,498.00**

7/13/2022	Filing fee for motion to compel & exhibits	\$31.74
7/13/2022	Certified mail fee for subpoena to IOA Properties III, LLC c/o Corporation Service Company	\$8.06

TOTAL COSTS

\$39.80

TOTAL THIS INVOICE

\$7,537.80

BALANCE FORWARD

\$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$7,537.80

Trust Balance

\$0.00

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Client: 1221 Bower, LLC
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30728

REMITTANCE

FEES	\$7,498.00
COSTS	<u>\$39.80</u>
TOTAL THIS INVOICE	\$7,537.80
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$7,537.80</u>
TRUST BALANCE	\$0.00

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ROA 1505

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

August 02, 2022
31004

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 7/31/2022:

7/18/2022	updated 1221 Bower trial binder exhibit list with Warner email about lease to show her intentions of getting out of the lease before knowing of mold	R.J.	0.30	\$28.50
7/18/2022	reviewed master timeline to update certain entries with more context with an eye towards trial narrative and strategy	R.J.	0.40	\$38.00
7/18/2022	reviewed and edited trial binder witness questions (Warner) [REDACTED]	R.J.	0.30	\$28.50
7/18/2022	reviewed and edited trial binder witness questions (Berry) [REDACTED]	R.J.	0.30	\$28.50
7/18/2022	analyzed Warner deposition and emails [REDACTED]	R.J.	0.60	\$57.00
7/18/2022	analyzed Warner deposition and emails [REDACTED]	R.J.	1.20	\$114.00
7/18/2022	continued drafting and tailoring witness questions (Warner) [REDACTED]	R.J.	0.90	\$85.50
7/18/2022	continued drafting and tailoring witness questions (Berry) [REDACTED]	R.J.	0.90	\$85.50
7/18/2022	continued drafting and tailoring witness questions (Dunnagan) [REDACTED]	R.J.	0.50	\$47.50
7/18/2022	continued drafting and tailoring witness questions (Adleman) [REDACTED]	R.J.	0.40	\$38.00
7/18/2022	started formulating AJ witness question narrative and strategy for trial	R.J.	0.20	\$19.00
7/19/2022	Meeting with Hal Cobb for trial prep and review of trial binder	P.K.	0.50	\$117.50
7/19/2022	Continued work on trial binder	P.K.	0.30	\$70.50
7/19/2022	Made notes on AJ's deposition in preparation to	R.J.	1.20	\$114.00

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ROA 1506

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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31004

	draft his witness questions for trial with a strategy and narrative			
7/19/2022	Started drafting witness questions (AJ) for trial	R.J.	0.40	\$38.00
7/19/2022	Continued drafting witness questions (AJ) using evidence from other witnesses for trial	R.J.	1.80	\$171.00
7/20/2022	Added September 25 internal emails to the trial binder	P.K.	0.20	\$47.00
7/20/2022	Drafted [REDACTED] for trial	P.K.	0.30	\$70.50
7/20/2022	Research on applicability of unclean hands defense at trial	P.K.	0.20	\$47.00
7/20/2022	Review of sworn proof of loss	P.K.	0.10	\$23.50
7/20/2022	Continued crafting witness questions (AJ) for trial	R.J.	0.40	\$38.00
7/20/2022	Continued drafting witness questions (AJ) for trial	R.J.	0.70	\$66.50
7/20/2022	Continued drafting witness questions (Warner) after reviewing notes on evidence	R.J.	0.10	\$9.50
7/20/2022	Continued creating master timeline for use at trial by updating the entries with more context for witness questions and use at trial	R.J.	0.60	\$57.00
7/20/2022	Started searching evidence files for documents referenced by IOA's discovery responses, and not already on master timeline	R.J.	3.40	\$323.00
7/20/2022	Continued work on trial binder	P.K.	0.30	\$70.50
7/21/2022	Hole punched Marcus Millichap discovery for trial binders	R.J.	1.10	\$104.50
7/21/2022	Continued Marcus Millichap holepunching for trial binder	R.J.	2.00	\$190.00
7/21/2022	Finished holepunching Marcus Millichap discover	R.J.	0.60	\$57.00
7/21/2022	Started printing 5 copies of proposed exhibits for trial	R.J.	0.20	\$19.00
7/21/2022	Continued printing 5 copies of proposed exhibits for trial	R.J.	0.70	\$66.50
7/21/2022	Placed printed Exhibits in order of bates number, hole punched and organized	R.J.	1.60	\$152.00
7/22/2022	Exhibits for trial analysis and preparation; incorporating same into questioning	P.K.	0.40	\$94.00
7/22/2022	Further trial prep focusing on exhibit list and prep of physical documents	P.K.	0.20	\$47.00
7/22/2022	Continued prepping exhibits	P.K.	0.20	\$47.00
7/22/2022	Review of timeline created by Clerk for use at trial	P.K.	0.40	\$94.00
7/22/2022	Continued timeline work - dates important for trial due to lease provisions; determine longest span of non responsiveness from Defendant	P.K.	0.20	\$47.00
7/22/2022	Continued review of lease for self-help provisions and timeline	P.K.	0.20	\$47.00

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31004

7/22/2022	Crissy Warner questioning	P.K.	0.20	\$47.00
7/25/2022	Review of longest span of time without a response from Defendant for use at trial	P.K.	0.10	\$23.50
7/25/2022	Analyzed the master timeline for IOA communications with CAMS to determine length of time between request and response	R.J.	1.50	\$142.50
7/25/2022	Updated 1221 Bower master timeline with context of IOA communications with CAMS for quick reference [REDACTED]	R.J.	1.30	\$123.50
7/25/2022	Reviewed and edited master timeline for better and more efficient use at trial	R.J.	0.70	\$66.50
7/25/2022	Placed Marcus Millichap document production into binders for use and reference at trial	R.J.	1.20	\$114.00
7/25/2022	Continued questioning of potential witnesses; strategy and contemplation of expected questioning by Plaintiff	P.K.	0.70	\$164.50
7/25/2022	Continued Dave Dunnagan questioning	P.K.	0.30	\$70.50
7/26/2022	Team meeting update and review of status of matter	P.K.	0.10	\$23.50
7/26/2022	Began drafting pre-trial brief, statement of facts, legal issues, stipulated facts	P.K.	0.40	\$94.00
7/27/2022	Pre-Trial Brief and determination of procedure for questions of law prior to trial (Declaratory Judgment)	P.K.	0.40	\$94.00
7/27/2022	Crafted flowchart of questions of law for trial	R.J.	0.60	\$57.00
7/27/2022	Discussed witness question and overall strategy for trial with Paige Kregor	R.J.	0.40	\$38.00
7/27/2022	Researched declaratory judgement action paired with breach of contract for trial procedure	R.J.	0.50	\$47.50
7/27/2022	Researched SCRCP rule 57 and SC Code 15-53-120 for declaratory judgement action procedure	R.J.	0.50	\$47.50
7/27/2022	Continued drafting pretrial brief by adding undisputed facts, disputed facts, and legal issues	R.J.	0.80	\$76.00
7/28/2022	Continued drafting witness questions for trial (Berry and Warner), [REDACTED]	R.J.	0.60	\$57.00
7/28/2022	Continued preparing binders of production for trial by labeling the spines	R.J.	0.90	\$85.50
TOTAL FEES			35.50	\$4,170.50

TOTAL COSTS \$0.00

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Client: 1221 Bower, LLC
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TOTAL THIS INVOICE	\$4,170.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$4,170.50</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

August 16, 2022
31130

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 8/15/2022:

8/1/2022	Travel and visit to 1221 bower	P.K.	1.60	\$376.00
8/1/2022	Continued making binder labels for the production for use at trial	R.J.	0.40	\$38.00
8/3/2022	Continued drafting undisputed facts section of the Pretrial Brief	R.J.	0.60	\$57.00
8/3/2022	Continued drafting facts in controversy section of Pretrial Brief	R.J.	0.50	\$47.50
8/4/2022	Subpoena correspondence with opposing counsel	P.K.	0.10	\$23.50
8/4/2022	Correspondence with opposing counsel re subpoena	P.K.	0.10	\$23.50
8/4/2022	Jury instructions and defenses	P.K.	0.20	\$47.00
8/4/2022	Continued drafting legal issues section of Pretrial Brief	R.J.	0.40	\$38.00
8/4/2022	Emails with other counsel, discuss subpoena with PK	S.T.L.	0.40	\$50.00
8/4/2022	Emails with IOA paralegal about response deadline extension	S.T.L.	0.10	\$12.50
8/8/2022	Continued drafting the law section of the pretrial brief	R.J.	0.20	\$19.00
8/8/2022	Added criteria to the voir dire for trial	R.J.	0.10	\$9.50
8/8/2022	Added more criteria to the voir dire for trial	R.J.	0.20	\$19.00
8/8/2022	Reviewed and fixed the pretrial brief format for the court	R.J.	0.20	\$19.00
8/9/2022	Searched for and added the addresses of prospective witnesses to the Pretrial Brief	R.J.	0.30	\$28.50
8/15/2022	Finished placing Marcus & Millichap production into binders for use at trial	R.J.	0.30	\$28.50

TOTAL FEES

5.70 \$836.50

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$836.50

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ROA 1510

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: August 16, 2022
Invoice No.: 31130

BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$836.50</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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INVOICE

1221 Bower, LLC

Invoice Date

September 01, 2022

Invoice Number

31374

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 8/31/2022:

8/15/2022	Spoke with Ryan Jones regarding the stage of litigation, the next steps and strategy.	C.L.	0.30	\$29.10
8/16/2022	Created and printed label for Marcus & Millichap discovery for trial production binders	R.J.	0.20	\$19.00
8/24/2022	Began catalogue and review of IOA Properties III subpoena response	P.K.	0.70	\$164.50

TOTAL FEES

1.20

\$212.60

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$212.60

BALANCE FORWARD

\$836.50

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$1,049.10

Trust Balance

\$0.00

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ROA 1512

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: September 01, 2022
Invoice No.: 31374

REMITTANCE

FEES	\$212.60
COSTS	\$0.00
TOTAL THIS INVOICE	\$212.60
BALANCE FORWARD	\$836.50
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$1,049.10</u>
TRUST BALANCE	\$0.00

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ROA 1513

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

**INVOICE**

1221 Bower, LLC

Invoice Date
Invoice NumberOctober 17, 2022
32004

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 10/15/2022:

10/3/2022	Correspondence re outstanding discovery	P.K.	0.10	\$23.50
10/3/2022	Review of discovery to date for email correspondence re motion to compel	P.K.	0.30	\$70.50
10/4/2022	Finished cataloguing subpoena response and sent emails to all regarding same; sent email to team describing overlap between MTC subject and this subpoena response	P.K.	0.70	\$164.50
10/5/2022	Correspondence regarding outstanding discovery items and motion to compel	P.K.	0.10	\$23.50
10/5/2022	Cross-referenced subpoena response to Third Set and drafted email to Ben Joyce	P.K.	0.40	\$94.00
10/5/2022	Discuss case strategy with PK	S.T.L.	0.20	\$25.00
10/12/2022	Conversation with S. Lott regarding discovery and motion to compel	P.K.	0.20	\$47.00
10/13/2022	Email regarding MTC and status of Ben's response to Hal and Shelby	P.K.	0.10	\$23.50
10/13/2022	Motion to compel correspondence and research for hearing	P.K.	0.30	\$70.50
TOTAL FEES			2.40	\$542.00

TOTAL COSTS **\$0.00****TOTAL THIS INVOICE** **\$542.00****BALANCE FORWARD** **\$0.00****PAYMENTS APPLIED****TOTAL AMOUNT DUE** **\$542.00***Trust Balance* **\$0.00**

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page:
Date:
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October 17, 2022
32004

REMITTANCE

FEES	\$542.00
COSTS	\$0.00
TOTAL THIS INVOICE	\$542.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$542.00</u>
TRUST BALANCE	\$0.00

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ROA 1515

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

November 01, 2022
32278

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

For services rendered and expenses paid on your behalf through 10/31/2022:

10/12/2022	Discuss MTC strategy with PK	S.T.L.	0.30	No Charge
10/17/2022	Motion to Compel hearing prep	P.K.	0.20	\$47.00
10/17/2022	Began drafting memo in support of motion to compel	P.K.	0.20	\$47.00
10/17/2022	Began drafting memorandum in support of motion to compel	P.K.	0.20	\$47.00
10/17/2022	Continued drafting memorandum in support of motion to compel	P.K.	0.50	\$117.50
10/17/2022	Referenced Judge Young's memo on proper discovery objections	P.K.	0.20	\$47.00
10/17/2022	Continued drafting Memo in support of Motion, inserted discovery rules and scope of relevant material	P.K.	0.20	\$47.00
10/17/2022	Discuss case strategy with PK related to MTC	S.T.L.	0.30	\$37.50
10/18/2022	Call with Ben Joyce	P.K.	0.10	\$23.50
10/19/2022	Motion roster correspondence with clerk	P.K.	0.10	\$23.50
10/31/2022	Updated and organized the file with Filed Pleadings and other related documents	A.W.	0.80	\$120.00
10/31/2022	Reviewed the Summons and Complaints to prepare for Corporate Meeting	A.W.	0.30	\$45.00
TOTAL FEES			3.40	\$602.00

TOTAL COSTS	\$0.00
TOTAL THIS INVOICE	\$602.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
TOTAL AMOUNT DUE	\$602.00
Trust Balance	\$0.00

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ROA 1516

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: November 01, 2022
Invoice No.: 32278

REMITTANCE

FEES	\$602.00
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$602.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$602.00</u>
TRUST BALANCE	\$0.00

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ROA 1517

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**INVOICE**

1221 Bower, LLC

Invoice Date
Invoice NumberNovember 16, 2022
32477**Client: 1221 Bower, LLC****Matter: Insurance Office of America v. 1221 Bower, LLC**

For services rendered and expenses paid on your behalf through 11/15/2022:

11/2/2022	Jury trial roster notification	P.K.	0.10	\$23.50
11/2/2022	Trial prep checklist	P.K.	0.20	\$47.00
11/2/2022	Review of status of e-file, organization, and checklist or remaining trial prep for same	P.K.	0.50	\$117.50
11/3/2022	Began drafting proof matrix of all causes of action, affirmative defenses for use at trial	P.K.	0.40	\$94.00
11/3/2022	Continued proof matrix	P.K.	0.20	\$47.00
11/3/2022	Continued working on Proof Matrix	P.K.	0.20	\$47.00
11/3/2022	Continued work on proof matrix	P.K.	0.40	\$94.00
11/3/2022	Exhibits Binder	P.K.	0.30	\$70.50
11/3/2022	Continued trial binder	P.K.	0.30	\$70.50
11/3/2022	Boxes of evidence - got out of storage and organized same	P.K.	0.30	\$70.50
11/3/2022	Review files, begin mapping out trial prep	S.T.L.	1.00	\$125.00
11/4/2022	Trial Binder	P.K.	0.40	\$94.00
11/14/2022	Email to Ben regarding motion for continuance	P.K.	0.20	\$47.00
11/14/2022	Drafted Motion for Continuance of trial based on military order	P.K.	0.30	\$70.50
11/14/2022	Emails with B. Joyce re continuance	P.K.	0.10	\$23.50
11/14/2022	Continued drafting motions and order	P.K.	0.10	\$23.50
11/15/2022	Motion for continuance finalization	P.K.	0.30	\$70.50
11/15/2022	Filing consent order for continuance	P.K.	0.20	\$47.00
11/15/2022	Read and responded to emails with Attorney Kregor and Shelby regarding the Motion and Order of Continuance	A.W.	0.20	\$30.00
11/15/2022	Revised the Notice of Motion and Motion for Continuance and proposed Order for Continuance	A.W.	0.20	\$30.00
TOTAL FEES			5.90	\$1,242.50
TOTAL COSTS				\$0.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 3
Date: November 16, 2022
Invoice No.: 32477

TOTAL THIS INVOICE	\$1,242.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$1,242.50</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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INVOICE

1221 Bower, LLC

Invoice Date November 30, 2022
Invoice Number 32604

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 11/29/2022:

11/16/2022	Correspondence internal regarding continuance of trial	P.K.	0.20	\$47.00
11/16/2022	Submitted to the Court the Motion and Motion for Continuance and proposed Order for Continuance	A.W.	0.10	\$15.00
11/16/2022	Emails regarding active duty dates	P.K.	0.10	\$23.50
11/16/2022	Discuss case strategy with PK, review and provide redlines for motion/order for continuance	S.T.L.	0.40	\$50.00
11/29/2022	Orders of protection	P.K.	0.10	\$23.50
TOTAL FEES			0.90	\$159.00

11/17/2022	Lexington County - Common Pleas - 32002 - E-Fileings - Motion and Order for Continuance filing fee: Order ID# 138132944			\$31.74
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TOTAL COSTS \$31.74

TOTAL THIS INVOICE \$190.74

BALANCE FORWARD \$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE \$190.74

Trust Balance \$0.00

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ROA 1520

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 2
Date: November 30, 2022
Invoice No.: 32604

REMITTANCE

FEES	\$159.00
COSTS	<u>\$31.74</u>
TOTAL THIS INVOICE	\$190.74
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$190.74</u>
TRUST BALANCE	\$0.00

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ROA 1521

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date

January 03, 2023

Invoice Number

32996

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 12/31/2022:

11/30/2022	Orders of protection emails	P.K.	0.10	\$23.50
12/20/2022	Review of trial status	P.K.	0.10	\$23.50
12/29/2022	Discussion of trial prep with S. Lott	P.K.	0.20	\$47.00
12/29/2022	Research on roster timing and otherwise reviewing status	P.K.	0.20	\$47.00

TOTAL FEES	0.60	\$141.00
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$141.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$141.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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ROA 1522

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 2
Date: January 03, 2023
Invoice No.: 32996

REMITTANCE

FEES	\$141.00
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$141.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$141.00</u>
TRUST BALANCE	\$0.00

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ROA 1523

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date

January 17, 2023

Invoice Number

33207

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 1/15/2023:

1/5/2023	Correspondence regarding military dates	P.K.	0.20	\$57.00
1/5/2023	Discuss case strategy [REDACTED] with PK, discuss property with client	S.T.L.	0.60	\$75.00
1/6/2023	Emails with Ann Cuniffe	P.K.	0.10	\$28.50
1/10/2023	Consult during corporate meeting re declaratory judgment claims	P.K.	0.20	\$57.00

TOTAL FEES

1.10

\$217.50

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$217.50

BALANCE FORWARD

\$0.00

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$217.50

Trust Balance

\$0.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page:
Date:
Invoice No.:

2 of 2
January 17, 2023
33207

REMITTANCE

FEES	\$217.50
.COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$217.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$217.50</u>
TRUST BALANCE	\$0.00

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CD COBB DILL & &H HAMMETT, LLC

INVOICE

1221 Bower, LLC

Invoice Date

February 01, 2023

Invoice Number

33489

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 1/31/2023:

1/17/2023	Date certain work	P.K.	0.10	No Charge
1/19/2023	Emails re military schedule	P.K.	0.10	\$23.50
1/20/2023	Follow up with AJ about military dates, discuss with PK	S.T.L.	0.20	\$20.00
1/23/2023	Email re military dates	P.K.	0.10	\$23.50
1/23/2023	Emails re orders of protection	P.K.	0.20	\$47.00
1/24/2023	Emails with opposing counsel	P.K.	0.10	\$23.50
1/24/2023	Drafted consent order for continuance and motion for continuance	P.K.	0.30	\$70.50
1/24/2023	Sent Shelby motion and verified submission of consent order	P.K.	0.10	\$23.50
1/25/2023	Emails re motion	P.K.	0.10	\$23.50
1/26/2023	Review of request for date certain	P.K.	0.10	\$23.50
1/27/2023	Calculated expected date certain	P.K.	0.10	\$23.50
1/30/2023	Status conference notice	P.K.	0.10	\$23.50
1/31/2023	Status conference	P.K.	0.70	\$164.50
1/31/2023	Ivana instructions and meeting regarding delegation of duties	P.K.	0.30	\$70.50
1/31/2023	Date certain correspondence with clerk	P.K.	0.20	\$47.00

TOTAL FEES

2.80

\$607.50

TOTAL COSTS

\$0.00

TOTAL THIS INVOICE

\$607.50

BALANCE FORWARD

\$0.00

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ROA 1526

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 3
Date: February 01, 2023
Invoice No.: 33489

PAYMENTS APPLIED

TOTAL AMOUNT DUE

\$607.50

Trust Balance

\$0.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 3 of 3
Date: February 01, 2023
Invoice No.: 33489

REMITTANCE

FEES	\$607.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$607.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$607.50</u>
TRUST BALANCE	\$0.00

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ROA 1528

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date February 16, 2023
Invoice Number 33695

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 2/15/2023:

1/31/2023	Status Conference with Judge M. Call and verification on date certain	H.E.C.	0.80	\$280.00
2/10/2023	Email to team re date certain	P.K.	0.10	\$23.50
2/10/2023	Added tentative date to Hal's calendar	P.K.	0.10	\$23.50
2/13/2023	Spoke with Shelby Lott re trial dates	P.K.	0.10	\$23.50

TOTAL FEES	1.10	\$350.50
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TOTAL COSTS	\$0.00
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TOTAL THIS INVOICE	\$350.50
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$350.50</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 2
Date: February 16, 2023
Invoice No.: 33695

REMITTANCE

FEES	\$350.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$350.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$350.50</u>
TRUST BALANCE	\$0.00

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ROA 1530

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CD COBB DILL & &H HAMMETT, LLC

INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

March 01, 2023
33839

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 2/28/2023:

2/16/2023	Went over the pleadings, discovery (INT, RFP, RTA) and depositions.	M.K.	5.00	\$475.00
2/22/2023	Consult with Tom regarding termination provisions	P.K.	0.10	\$23.50
2/22/2023	Declaratory judgment motion research in hopes of scheduling hearing prior to trial	P.K.	0.40	\$94.00
2/22/2023	Research on Declaratory Judgments	P.K.	0.20	\$47.00
2/24/2023	Trial strategy with Tom Krahe comparing similar cases	P.K.	0.20	\$47.00

TOTAL FEES **5.90** **\$686.50**

TOTAL COSTS **\$0.00**

TOTAL THIS INVOICE **\$686.50**

BALANCE FORWARD **\$0.00**

PAYMENTS APPLIED

TOTAL AMOUNT DUE **\$686.50**

Trust Balance **\$0.00**

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ROA 1531

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page:
Date:
Invoice No.:

2 of 2
March 01, 2023
33839

REMITTANCE

FEES	\$686.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$686.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$686.50</u>
TRUST BALANCE	\$0.00

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ROA 1532

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

April 06, 2023
34350

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 3/31/2023:

3/17/2023	Emails regarding dates for trial	P.K.	0.10	\$23.50
TOTAL FEES			0.10	\$23.50
TOTAL COSTS				\$0.00
TOTAL THIS INVOICE				\$23.50
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$23.50</u>
<i>Trust Balance</i>				<i>\$0.00</i>

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ROA 1533

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page:
Date:
Invoice No.:

2 of 2
April 06, 2023
34350

REMITTANCE

FEEs	\$23.50
COSTs	<u>\$0.00</u>
TOTAL THIS INVOICE	\$23.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$23.50</u>
TRUST BALANCE	\$0.00

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ROA 1534

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice NumberApril 20, 2023
34935**Client: 1221 Bower, LLC****Matter: Insurance Office of America v. 1221 Bower, LLC**

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 4/15/2023:

4/4/2023	Scheduling trial dates	P.K.	0.10	\$23.50
4/10/2023	Receipt of form 4 and consult with Ivana on date certain	P.K.	0.10	\$23.50
TOTAL FEES			0.20	\$47.00

TOTAL COSTS	\$0.00
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TOTAL THIS INVOICE	\$47.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$47.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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ROA 1535

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page:
Date:
Invoice No.:

2 of 2
April 20, 2023
34535

REMITTANCE

FEES	\$47.00
COSTS	\$0.00
TOTAL THIS INVOICE	\$47.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$47.00</u>
TRUST BALANCE	\$0.00

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ROA 1536

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

June 01, 2023
35179

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 5/31/2023:

4/10/2023	Review Form 4 Files	S.T.L.	0.20	No Charge
5/31/2023	Receipt of request to supplement and review of file; email to AJ	P.K.	0.30	\$70.50
TOTAL FEES			0.50	\$70.50

TOTAL COSTS	\$0.00
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TOTAL THIS INVOICE	\$70.50
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$70.50</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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ROA 1537

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page:
Date:
Invoice No.:

2 of 2
June 01, 2023
35179

REMITTANCE

FEES	\$70.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$70.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$70.50</u>
TRUST BALANCE	\$0.00

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ROA 1538

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

June 15, 2023
35405

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 6/15/2023:

6/1/2023	CMS roofing subpoena	P.K.	0.10	\$23.50
6/2/2023	Instructions to Ivana to supplement discovery responses	P.K.	0.20	\$47.00
6/7/2023	Began drafting supplemental discovery responses	P.K.	0.20	\$47.00
6/7/2023	Correspondence review from opposing counsel	P.K.	0.20	\$47.00
6/12/2023	Subpoena review Angela Adleman	P.K.	0.20	\$47.00
6/13/2023	Email to AJ	P.K.	0.20	\$47.00
6/13/2023	Began drafting Defendant's Supplemental Answers to Plaintiff's Second Set of Interrogatories.	I.B.	0.40	\$60.00
6/13/2023	Began drafting Defendant's Supplemental Answers to Plaintiff's Second Set of Requests for Production.	I.B.	0.40	\$60.00

TOTAL FEES	1.90	\$378.50
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$378.50
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$378.50</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 2 of 2
Date: June 15, 2023
Invoice No.: 35405

REMITTANCE

FEES	\$378.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$378.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$378.50</u>
TRUST BALANCE	\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

August 03, 2023
38113

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 7/31/2023:

6/20/2023	Update email to Ben Joyce and discussion at corporate team meeting	P.K.	0.20	No Charge
7/18/2023	Clerk emails regarding trial prep	P.K.	0.20	\$33.50
7/18/2023	Email from clerk re trial binder	P.K.	0.10	\$16.75
7/19/2023	Emails with Ivana regarding discovery responses	P.K.	0.20	\$33.50
7/19/2023	Update at team meeting	P.K.	0.10	\$16.75
7/19/2023	Emails with Paige regarding Supplemental Response to Discovery.	I.B.	0.20	\$30.00
7/20/2023	Email to team re date certain	P.K.	0.10	\$16.75
7/20/2023	Trial binder work	P.K.	1.00	\$167.50
7/20/2023	Began organizing documents for supplemental responses to Plaintiff's Requests for Production.	I.B.	0.40	\$60.00
7/21/2023	Continued organizing documents to start drafting supplemental response to Request for Production.	I.B.	0.40	\$60.00
7/24/2023	Receipt o motion and responses drafting; review of document production	P.K.	1.50	\$251.25
7/24/2023	Answers to requests for production	P.K.	0.20	\$33.50
7/24/2023	Email to Lynn Snyder again re resume for hearing	P.K.	0.10	\$16.75
7/24/2023	Comparing documents produced in the 2nd Request for Production with the once for supplement.	I.B.	1.10	\$165.00
7/24/2023	Organization and meeting with Ivana to get discovery completed	P.K.	0.80	\$134.00
7/24/2023	Continued working on supplemental discovery responses	P.K.	0.30	\$50.25
7/24/2023	Drafted Supplemental answers to Plaintiff's 2nd Set of Requests for Production.	I.B.	0.60	\$90.00
7/24/2023	Bate stamped documents for Supplemental Production.	I.B.	0.20	\$30.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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36113

7/25/2023	Call with Hal noted needed changes to spreadsheet	P.K.	0.10	\$16.75
7/25/2023	Began reviewing Trial Binder.	I.B.	0.70	\$105.00
7/26/2023	Continued reviewing the Trial Binder Prep.	I.B.	0.60	\$90.00
7/27/2023	Review of First set of rogs to determine which questions must be supplemented with provided information from AJ	P.K.	0.10	\$16.75
7/27/2023	Meeting with Hal, Paige, and Kayla regarding prep for trial.	I.B.	0.80	\$120.00
7/28/2023	Team meeting re trial preparation	P.K.	0.60	\$100.50
7/28/2023	Review of Kayla's voir dire questions and types of jurors analysis	P.K.	0.40	\$67.00
TOTAL FEES			11.00	\$1,721.50

TOTAL COSTS	\$0.00
TOTAL THIS INVOICE	\$1,721.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$1,721.50</u>
<i>Trust Balance</i>	<i>\$0.00</i>

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Client: 1221 Bower, LLC
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REMITTANCE

FEES	\$1,721.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$1,721.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$1,721.50</u>
TRUST BALANCE	\$0.00

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ROA 1543

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

August 16, 2023
36298

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 8/16/2023:

8/1/2023	Review of Aj's updated spreadsheet	P.K.	0.20	\$33.50
8/4/2023	Review emails on damages, consolidate and provide for supplemental discovery	H.E.C.	1.10	\$184.25
8/8/2023	Emails re discovery	P.K.	0.20	\$33.50
8/10/2023	Discovery supplements	P.K.	1.00	\$167.50
8/10/2023	Discovery meeting with Ivana	P.K.	0.50	\$83.75
8/10/2023	Updated Supplemental Defendant's Responses to Plaintiff's First and Second Set of Requests for Production. Bates Stamped documents for production.	I.B.	1.40	\$210.00
8/11/2023	Drafted cover letter for discovery.	I.B.	0.20	\$30.00
8/11/2023	Drafted Certificate of Service for Discovery.	I.B.	0.30	\$45.00
8/11/2023	Emailed opposing counsel Defendant's Response to First and Second Set of Interrogatories, and First and Second Set for Requests for Production along with bates stamped evidence.	I.B.	0.20	\$30.00

TOTAL FEES	5.10	\$817.50
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$817.50
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$817.50</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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36298

REMITTANCE

FEES	\$817.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$817.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$817.50</u>
TRUST BALANCE	\$0.00

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ROA 1545

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

August 30, 2023
36348

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 8/30/2023:

8/16/2023	Meeting with Jenna regarding file	P.K.	0.60	\$100.50
8/22/2023	Began organizing evidence for Motion to Compel Hearing scheduled for 8.28.2023.	I.B.	1.30	\$195.00
8/22/2023	Email with Ben and instructions on MTC argument, emails with AJ re subpoena to Nikki	H.E.C.	1.10	\$184.25
8/23/2023	Began Drafting Memo in Opposition to Plaintiff's Motion to Compel Discovery.	I.B.	1.30	\$195.00
8/24/2023	Continued drafting Memo in Opposition to Motion to Compel Discovery.	I.B.	0.90	\$135.00
8/24/2023	Continued drafting Memo in Opposition to Motion to Compel Discovery.	I.B.	0.80	\$120.00
8/24/2023	Reviewed drafted Shell of Memo in Opposition to Motion to Compel Discovery with Hal.	I.B.	0.30	\$45.00
8/24/2023	Updated Memo in Opposition to Motion to Compel.	I.B.	1.50	\$225.00
8/25/2023	Email to Andrew Leone regarding subpoena for documents production from Main Gate Management, LLC.	I.B.	0.10	\$15.00
8/25/2023	Updated Memo in Opposition to Motion to Compel with more arguments.	I.B.	0.60	\$90.00
8/25/2023	Organized Exhibits A-E to Memo in Opposition to Motion to Compel Discovery.	I.B.	0.50	\$75.00
8/25/2023	Emailed Hal for review Memo in Opposition to Motion to Compel Discovery along with Exhibits A-E.	I.B.	0.10	\$15.00
8/25/2023	Drafted Defendant's request for supplemental responses to second set of requests for production.	I.B.	0.60	\$90.00
8/25/2023	Drafted cover letter for requests for supplemental responses to second set of requests for production.	I.B.	0.20	\$30.00
8/25/2023	Updated request for supplemental responses to Defendants Second Set of Production per AJ's	I.B.	0.10	\$15.00

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Client: 1221 Bower, LLC
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	email to Hal.			
8/25/2023	Discovery emails and review, emails with AJ, emails with Ben Joyce	H.E.C.	2.00	\$335.00
8/26/2023	Phone call with Hal regarding Memo in Opposition to Motion to Compel and extra exhibits to create.	I.B.	0.10	\$15.00
8/26/2023	Created two more exhibits to Memo in Opposition to Motion to Compel.	I.B.	0.30	\$45.00
8/26/2023	Reorganizing all exhibits with two new exhibits added.	I.B.	0.40	\$60.00
8/26/2023	Reviewing Memo in opposition to MTC and making sure that all exhibits match.	I.B.	0.30	\$45.00
8/26/2023	E-filed Memo in Opposition to Motion to Compel Discovery along with Exhibits A-G.	I.B.	0.20	\$30.00
8/28/2023	Consult with Hal (9 min), reviewed email and attachments.	W.H.	0.40	No Charge
8/28/2023	Drafted Certificate of Service for Defendant's Second Set of Requests for Production.	I.B.	0.30	\$45.00
8/28/2023	Organized documents and served via email Benjamin Joyce, attorney for Insurance of America, with Defendant's Second Set of Requests for Production.	I.B.	0.20	\$30.00
8/28/2023	Drafted Subpoena to Rob Motley.	I.B.	0.30	\$45.00
8/28/2023	Drafted Exhibit A to Subpoena to Rob Motley.	I.B.	0.30	\$45.00
8/28/2023	Drafted Subpoena to Scott Berry.	I.B.	0.20	\$30.00
8/28/2023	Drafted Exhibit A to Subpoena to Scott Berry.	I.B.	0.30	\$45.00
8/28/2023	Drafted Cover Letter for Subpoena to Rob Motley.	I.B.	0.20	\$30.00
8/28/2023	Drafted Cover Letter for Subpoena to Scott Berry.	I.B.	0.20	\$30.00
8/28/2023	Updated Exhibits to Subpoena per Hal.	I.B.	0.10	\$15.00
8/28/2023	Emailed Hal drafted Cover Letters, Subpoenas, and Exhibits for review.	I.B.	0.10	\$15.00
8/29/2023	Organized document to be served on Rob Motley and Scott Berry. Requested Service same day rush via Falcon Process Service.	I.B.	0.30	\$45.00
8/29/2023	Organized all documents produced by Insurance Office of America Inc., created Dropbox and emailed Hal and Mr. Leone for review.	I.B.	1.70	\$255.00
8/29/2023	Correspondence via email with Mr. Leone, regarding deposition transcripts.	I.B.	0.10	\$15.00
8/29/2023	Searched for deposition transcripts for Leone, Adleman, Dunnagen, Berry, Warner, Motley and Rudolph. Emailed Mr. Leone.	I.B.	0.90	\$135.00
8/29/2023	Emails with Hal regarding 5th, 6th, and 7th, Plaintiff's supplemental responses.	I.B.	0.10	\$15.00
8/29/2023	Emails back and forth with Falcon Process Service regarding service of subpoena with exhibit A on	I.B.	0.20	\$30.00

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Client: 1221 Bower, LLC
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	Rob Motley and Scott Berry.			
8/30/2023	Follow up with Falcon regarding service of subpoena on Rob Motley and Scott Berry.	I.B.	0.10	\$15.00
8/30/2023	Emailed Mr. Leone Notice from Falcon of served Subpoena with Exhibit A on Rob Motley.	I.B.	0.10	\$15.00
8/30/2023	Emailed Mr. Leone Notice from Falcon regarding service of Subpoena along with Exhibit A on Scott Berry.	I.B.	0.10	\$15.00
TOTAL FEES			19.50	\$2,929.75
TOTAL COSTS				\$0.00
TOTAL THIS INVOICE				\$2,929.75
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$2,929.75</u>
<i>Trust Balance</i>				<i>\$0.00</i>

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Client: 1221 Bower, LLC
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REMITTANCE

FEES	\$2,929.75
COSTS	~~\$0.00~~
TOTAL THIS INVOICE	\$2,929.75
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$2,929.75</u>
TRUST BALANCE	\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date September 15, 2023
Invoice Number 38506

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 9/15/2023:

8/28/2023	Mac hearing resolution and subpoena exhibit finalization	H.E.C.	1.00	\$167.50
9/6/2023	Created a Trial Binder with Exhibits, and Deposition Binder in preparation for trial.	M.K.	1.20	\$114.00
9/6/2023	Updated file with Affidavit of Service of Subpoenas with Exhibit A, on Scott Berry and Rob Motley. Emailed Benjamin Joyce.	I.B.	0.30	\$45.00
9/6/2023	Review of case files and creating trial prep binder	J.D.	1.60	\$240.00
9/7/2023	Review of AJ deposition	J.D.	1.40	\$210.00
9/7/2023	Trial binder work	J.D.	1.70	\$255.00
9/7/2023	Review of AJ deposition	J.D.	0.50	\$75.00
9/7/2023	deposition review	J.D.	1.00	\$150.00
9/8/2023	Email to Mr. Leone regarding meeting with Hal for trial prep.	I.B.	0.10	\$15.00
9/11/2023	Review of Scott Berry deposition	J.D.	1.30	\$195.00
9/11/2023	Deposition review of Christina Warner	J.D.	1.70	\$255.00
9/12/2023	Meeting with Hal and Ivanna to discuss trial prep and timeline	J.D.	0.20	\$30.00
9/12/2023	Meeting with Hal and Jenna, trial strategy preparation.	I.B.	0.30	\$45.00
9/12/2023	Email to Mr. Leone regarding meeting scheduled for 9.19.2023.	I.B.	0.10	\$15.00
9/12/2023	Email to Katie regarding a copy of deposition transcript of Rob Motley.	I.B.	0.10	\$15.00
9/12/2023	Angela deposition review	J.D.	1.20	\$180.00
9/12/2023	Instructions to Maddie regarding discovery binder and documents produced by IOF in preparation for trial.	I.B.	0.30	\$45.00
9/12/2023	Melissa deposition review	J.D.	0.40	\$60.00

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ROA 1550

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
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Client: 1221 Bower, LLC**Matter:** Insurance Office of America v. 1221 Bower, LLC**Page:**

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Date:

September 15, 2023

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36506

9/12/2023	Reviewing deposition transcripts of David Dunnagan, Christina Warner, and Angela Adleman, searching for DOB, previous addresses, dates of depositions regarding preparation to draft Witness Subpoenas for trial.	I.B.	0.60	\$90.00
9/12/2023	Drafted Witness Subpoenas for Robert Motley, Scott Berry, David Dunnagan, Christina Warner, and Angela Adleman.	I.B.	0.40	\$60.00
9/12/2023	Trial binder review	J.D.	0.60	\$90.00
9/12/2023	Organizing discovery documents for binders in preparation for trial. Giving instructions to Maddie for the rest of documents.	I.B.	0.70	\$105.00
9/12/2023	Review disco and start prep on trial binder for trial	H.E.C.	1.20	\$201.00
9/13/2023	Discovery review for trial prep	J.D.	1.00	\$150.00

TOTAL FEES**18.90****\$2,807.50****TOTAL COSTS****\$0.00****TOTAL THIS INVOICE****\$2,807.50****BALANCE FORWARD****\$0.00****PAYMENTS APPLIED****TOTAL AMOUNT DUE****\$2,807.50***Trust Balance***\$0.00**

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Client: 1221 Bower, LLC
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REMITTANCE

FEES	\$2,807.50
COSTS	~~\$0.00~~
TOTAL THIS INVOICE	\$2,807.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$2,807.50</u>
TRUST BALANCE	\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date September 29, 2023
Invoice Number 36892

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 9/30/2023:

9/18/2023	Discussions with Maddie re: trial binders	J.D.	0.20	\$30.00
9/18/2023	Trial prep - re-reading through all pleadings and highlighting strengths and weaknesses in lease agreement	J.D.	1.40	\$210.00
9/18/2023	Trial prep	H.E.C.	1.00	\$167.50
9/19/2023	AJ and Angela questions for trial	J.D.	0.70	\$105.00
9/19/2023	AJ opposing counsel questions prep	J.D.	1.20	\$180.00
9/19/2023	AJ questions - trial prep	J.D.	0.60	\$90.00
9/19/2023	AJ deposition review re: insurance claim	J.D.	0.30	\$45.00
9/19/2023	Trial preparation with AJ, Hal and Ivana	J.D.	1.70	\$255.00
9/19/2023	Trial prep for AJ with Hal and Jenna.	I.B.	1.50	\$225.00
9/19/2023	Review of Answer and lease agreement	J.D.	0.90	\$135.00
9/19/2023	Trial prep	H.E.C.	2.55	\$427.13
9/20/2023	Drafted Cover Letter to Subpoena to Christina Warner as witness at the Trial.	I.B.	0.20	\$30.00
9/20/2023	Updated dates in Subpoenas for all five witnesses to be present at trial.	I.B.	0.20	\$30.00
9/20/2023	Drafted Cover Letter to Subpoena to Angela Adleman as witness at the Trial.	I.B.	0.20	\$30.00
9/20/2023	Drafted Cover Letter to Subpoena to David Dunnagan as witness at the Trial.	I.B.	0.20	\$30.00
9/20/2023	Drafted Cover Letter to Subpoena to Robert Motley as witness at the Trial.	I.B.	0.20	\$30.00
9/20/2023	Drafted Cover Letter to Subpoena to Scott Berry as witness at the Trial.	I.B.	0.20	\$30.00
9/20/2023	Organized cover letters with subpoenas, emailed opposing counsel.	I.B.	0.40	\$60.00
9/20/2023	Requested service via Falcon Process Server of subpoenas on Motley, Berry, Adleman, Warner,	I.B.	0.20	\$30.00

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ROA 1553

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
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	and Dunnagan.			
9/21/2023	Email to AJ regarding subpoena service on Angela Adleman.	I.B.	0.10	\$15.00
9/21/2023	Communication with Falcon regarding subpoenas to be served on witnesses for trial.	I.B.	0.20	\$30.00
9/21/2023	Trial prep - [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	H.E.C.	2.30	\$385.25
9/22/2023	Email correspondence with HC regarding service of Subpoenas on Angela Adleman and David Dunnagan.	I.B.	0.10	\$15.00
9/25/2023	Discussion with Hal re: witness questions and run through of questions	J.D.	0.30	\$45.00
9/25/2023	Conversation with Maddie re: finding email of notification in discovery and [REDACTED] [REDACTED]	J.D.	0.20	\$30.00
9/25/2023	trial prep with Hal	J.D.	0.30	\$45.00
9/25/2023	1221 diagram optimization for trial exhibit	J.D.	0.70	\$105.00
9/25/2023	Discussion with Hal and Jenna regarding a trial prep - exhibits.	I.B.	0.30	\$45.00
9/25/2023	Trial prep	H.E.C.	1.50	\$251.25
9/26/2023	Lease and complaint review with Hal	J.D.	0.30	\$45.00
9/26/2023	Conversation with Maddie and Ivana re: discovery supplemental requests 2-4	J.D.	0.50	\$75.00
9/26/2023	Trial prep, call with AJ	H.E.C.	2.30	\$385.25
9/27/2023	Phone call, trial prep with Hal and Jenna.	I.B.	1.40	\$210.00
9/27/2023	Call with AJ for trial prep	J.D.	1.40	\$210.00
9/27/2023	Discussion with Jenna and Maddie regarding all discovery requests for production sent to Plaintiff regarding trial preparation.	I.B.	0.40	\$60.00
9/27/2023	Review of latest supp. discovery received	J.D.	0.30	\$45.00
9/27/2023	Discussion with Jenna regarding question for witnesses at the trial.	I.B.	0.30	\$45.00
9/27/2023	Discussion with Jenna and Maddie regarding exhibits to the questions for witnesses at trial.	I.B.	0.30	\$45.00
9/27/2023	Drafting of Rob Motley witness questions and review of his deposition for anticipated answers	J.D.	1.60	\$240.00
9/27/2023	Discussions with Maddie re: new discovery produced and relevant documents	J.D.	0.20	\$30.00
9/27/2023	Review of discovery	J.D.	0.60	\$90.00
9/27/2023	Discovery text message and email review August	J.D.	0.70	\$105.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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14 - November 20				
9/27/2023	[REDACTED] [REDACTED] trial	J.D.	0.50	\$75.00
9/28/2023	[REDACTED] trial exhibit	J.D.	1.10	\$165.00
9/28/2023	Pre-trial brief	J.D.	0.50	\$75.00
9/28/2023	Discovery binders condensed down for trial, exhibits	J.D.	1.80	\$270.00
	Binders gone through to ensure we have everything we need			
9/28/2023	Organizing discovery binders for trial exhibits. Going through binders to ensure we have everything we need.	I.B.	1.80	\$270.00
9/28/2023	Email correspondence with Jenna regarding trial prep.	I.B.	0.20	\$30.00
TOTAL FEES			36.05	\$5,576.38
9/19/2023	Falcon Express Inv 2023007847. \$260.00			\$260.00
9/19/2023	Falcon Express Inv 2023007848. \$220.00			\$220.00
9/22/2023	Travel- Lexington IB and JD Best Western Plus Booking Confirmation 5641-7639			\$952.66
TOTAL COSTS				\$1,432.66
TOTAL THIS INVOICE				\$7,009.04
BALANCE FORWARD				\$2,807.50
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$9,816.54</u>
<i>Trust Balance</i>				<i>\$0.00</i>

Cobb Dill & Hammett, LLC
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 4 of 4
Date: September 29, 2023
Invoice No.: 36892

REMITTANCE

FEES	\$5,576.38
COSTS	<u>\$1,432.66</u>
TOTAL THIS INVOICE	\$7,009.04
BALANCE FORWARD	\$2,807.50
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$9,816.54</u>
TRUST BALANCE	\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

October 13, 2023
36986

Client: **1221 Bower, LLC**

Matter: **Insurance Office of America v. 1221 Bower, LLC**

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 10/15/2023:

9/27/2023	Trial prep	H.E.C.	3.00	\$502.50
9/29/2023	Trial prep	H.E.C.	0.80	\$134.00
10/1/2023	Trial Prep	H.E.C.	3.00	\$502.50
10/2/2023	Trial prep with Hal	J.D.	1.00	\$150.00
10/2/2023	Pre-Trial brief to include lease provisions 12.7 and 12.8	J.D.	0.50	\$75.00
10/2/2023	Reviewing Jury list.	I.B.	0.30	\$45.00
10/2/2023	Discussion with Hal regarding Judge at the trial.	I.B.	0.10	\$15.00
10/2/2023	Per Hal phone call with the clerk of court regarding which one of two judges will be assigned to our case.	I.B.	0.20	\$30.00
10/2/2023	Voir Dire with Hal	J.D.	0.50	\$75.00
10/2/2023	Pre-Trial Brief and case law research	J.D.	2.30	\$345.00
10/2/2023	Sit in on trial prep discussion with HEC & Depoy.	D.K.	1.00	No Charge
10/2/2023	Trial prep	H.E.C.	5.00	\$837.50
10/3/2023	Pre-trial brief	J.D.	0.50	\$75.00
10/3/2023	Discussion with Hal regarding pre-trial brief and exhibits.	I.B.	0.10	\$15.00
10/3/2023	Began drafting Affidavit of Attorneys Fees.	I.B.	0.30	\$45.00
10/3/2023	Pre-trial brief, dates incorporated	J.D.	0.60	\$90.00
10/3/2023	Drafted Motion to Compel Subpoena Response from Robert Motley and Motion to Compel Subpoena Response from Scott Berry.	I.B.	1.20	\$180.00
10/3/2023	Organized exhibit to Motion to Compel for Robert Motley and Scott Berry.	I.B.	0.50	\$75.00
10/3/2023	Pre-Trial brief with full list exhibits list captioned and in chronological order and witness list for court	J.D.	5.50	\$825.00
10/3/2023	Updated Motion to Compel Subpoena Response	I.B.	0.30	\$45.00

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ROA 1557

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Page:

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Date:

October 13, 2023

Invoice No.:

36986

	for Robert Motley and Scott Berry prior to filing.			
10/3/2023	E-filed Motion to Compel Subpoena Response to Robert Motley and Scott Berry with Exhibits.	I.B.	0.30	\$45.00
10/3/2023	Trial prep- Exhibits for trial - ordering for timeline retrieval - going through new discovery P just sent	J.D.	3.50	\$525.00
10/3/2023	Trial prep	H.E.C.	1.80	\$301.50
10/4/2023	Trial prep with AJ.	I.B.	2.20	\$330.00
10/4/2023	Trial prep with AJ	J.D.	2.20	\$330.00
10/4/2023	Began organizing exhibits for the trial.	I.B.	1.30	\$195.00
10/4/2023	Finished drafting Affidavit of Attorney's fees.	I.B.	0.30	\$45.00
10/4/2023	Working on organizing exhibits, pleadings binder, invoices binder, deposition transcripts for trial.	I.B.	3.50	\$525.00
10/4/2023	Trial Prep - Exhibits, pre-trial brief with attachments (voir dire, jury charges, etc), organization of exhibits by witness, filing, etc	J.D.	9.50	\$1,425.00
10/4/2023	Prep AJ, trial prep	H.E.C.	6.00	\$1,005.00
10/5/2023	Discussion with Hal regarding Jessica Colby preparation for trial.	I.B.	0.20	\$30.00
10/5/2023	Updated Pre-trial Brief.	I.B.	0.10	\$15.00
10/5/2023	Review of Plaintiff's pre-trial brief	J.D.	0.50	\$75.00
10/5/2023	Conversation with Ivana and Maddie re: Motion in Limine	J.D.	0.30	\$45.00
10/5/2023	Tabbing and highlighting [REDACTED] for trial use	J.D.	0.60	\$90.00
10/5/2023	Notes on Plaintiff's pre-trial brief anticipated motions in limine	J.D.	0.40	\$60.00
10/5/2023	Reviewed and organized emails, text messages and photos by dates for Jessica Colby as a possible witness at trial.	I.B.	2.90	\$435.00
10/5/2023	[REDACTED] tabbing and highlighting [REDACTED]	J.D.	2.20	\$330.00
10/5/2023	Tabbing and highlighting [REDACTED] for trial	J.D.	1.20	\$180.00
10/5/2023	Review first draft motion in limine and email to Maddie regarding edits to be made	J.D.	0.50	\$75.00
10/5/2023	Trial prep with Hal	J.D.	0.40	\$60.00
10/5/2023	[REDACTED] for trial	J.D.	0.50	\$75.00
10/5/2023	Updating and cleaning Pre-trial Binder.	I.B.	2.10	\$315.00
10/5/2023	Organizing Invoice binder for trial.	I.B.	0.90	\$135.00
10/5/2023	Trial prep with Hal - run through of facts Plaintiff is attempting to exclude and how to get them admitted	J.D.	0.50	\$75.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Page: 3 of 4
Date: October 13, 2023
Invoice No.: 36986

10/5/2023	Trial prep	H.E.C.	8.00	\$1,340.00
10/6/2023	Edits to Motion in Limine	J.D.	0.40	\$60.00
10/6/2023	Began reorganizing invoice binder with new invoices AJ provided to Hal.	I.B.	1.60	\$240.00
10/6/2023	Meeting with team regarding continuance of trial.	I.B.	0.40	\$60.00
10/6/2023	Finished organizing Invoice binder for Trial.	I.B.	2.10	\$315.00
10/6/2023	Roster meeting, trial prep, and trial stop due to continuance	H.E.C.	3.00	\$502.50
10/10/2023	Subpoena and letter drafting for deposition of Jessica Colby	J.D.	0.50	\$75.00

TOTAL FEES	86.60	\$13,375.50
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$13,375.50
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$13,375.50</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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October 13, 2023
36986

REMITTANCE

FEES	\$13,375.50
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$13,375.50
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$13,375.50</u>
TRUST BALANCE	\$0.00

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INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

October 23, 2023
37187

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 10/23/2023:

10/13/2023	Conversation with MK re: Jessica Colby deposition questions	J.D.	0.30	\$45.00
10/13/2023	Email to IB re: scheduling of deposition of Jessica Colby	J.D.	0.10	\$15.00
10/13/2023	Subpoena duces tecum for Jessica Colby	J.D.	0.50	\$75.00
10/16/2023	Correspondence with Hal and Jenna regarding Hearing scheduled for 11.13.2023. at 9:30 am for Motion to Compel.	I.B.	0.20	\$30.00
10/16/2023	Jessica Colby - Duces Tecum	J.D.	0.50	\$75.00
10/19/2023	Email on depo and subpoena review	H.E.C.	0.80	\$134.00
10/20/2023	Phone call with Hal and Jessica Colby regarding her deposition scheduled for November 29, 2023.	I.B.	0.20	\$30.00

TOTAL FEES	2.60	\$404.00
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE	\$404.00
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BALANCE FORWARD	\$0.00
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>	<u>\$404.00</u>
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<i>Trust Balance</i>	<i>\$0.00</i>
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: October 23, 2023
Invoice No.: 37187

REMITTANCE

FEES	\$404.00
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$404.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$404.00</u>
TRUST BALANCE	\$0.00

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ROA 1562

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

November 01, 2023
37357

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 11/1/2023:

10/31/2023	JC deposition prep	J.D.	0.50	\$75.00
10/31/2023	Updated Subpoena Duces Tecum and attachment to subpoena and requested service on Jessica Colby via Falcon Process Service.	I.B.	0.30	\$45.00
TOTAL FEES			0.80	\$120.00
10/30/2023	Falcon Express Inv 2023008436. \$175			\$175.00
10/30/2023	Falcon Express Inv 2023008437. 175.00			\$175.00
TOTAL COSTS				\$350.00
TOTAL THIS INVOICE				\$470.00
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
TOTAL AMOUNT DUE				\$470.00
Trust Balance				\$0.00

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date:
Invoice No.:

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November 01, 2023
37357

REMITTANCE

FEES	\$120.00
COSTS	\$350.00
TOTAL THIS INVOICE	\$470.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$470.00</u>
TRUST BALANCE	\$0.00

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ROA 1564

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date November 15, 2023
Invoice Number 37590

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 11/15/2023:

11/13/2023	Phone call with Hal and AJ regarding today's hearing and new subpoenas to be sent for deposition of Jessica Colby and Robert Motley.	I.B.	0.20	\$30.00
11/13/2023	Reviewing last produced documents from Insurance Office of America prior to sending new subpoenas out for deposition of Jessica Colby and Robert Motley.	I.B.	0.40	\$60.00
11/13/2023	Discussion with Hal regarding subpoenas for deposition of Jessica Colby and Robert Motley. Subpoena for documents production to First Community Bank, and subpoena for documents production to Gabriel De Jesus.	I.B.	0.30	\$45.00
11/13/2023	Drafted Subpoena for Deposition scheduled for 12/14/2023 for Jessica Colby.	I.B.	0.20	\$30.00
11/13/2023	Drafted Cover Letter for Subpoena for Deposition scheduled for 12/14/2023 to Jessica Colby.	I.B.	0.20	\$30.00
11/13/2023	Drafted Subpoena for Deposition scheduled for 12/14/2023 for Robert Motley.	I.B.	0.20	\$30.00
11/13/2023	Drafted Subpoena for documents production to Robert Motley.	I.B.	0.20	\$30.00
11/13/2023	Updated Exhibit A to Subpoena for documents production to Robert Motley.	I.B.	0.10	\$15.00
11/13/2023	Drafted Cover Letter to Subpoena for Deposition and Subpoena for Documents Production to Robert Motley.	I.B.	0.20	\$30.00
11/13/2023	Drafted Subpoena to First Community Bank for production of documents related to closing for 101 W Main St., LLC regarding the property located at 101 W Main St., Lexington, SC.	I.B.	0.20	\$30.00
11/13/2023	Drafted Exhibit A to Subpoena to First Community Bank for production of documents related to closing for 101 W Main St., LLC regarding the property located at 101 W Main St., Lexington, SC.	I.B.	0.20	\$30.00

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ROA 1565

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

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Date:

November 15, 2023

Invoice No.:

37550

11/13/2023	Drafted Subpoena to Gabriel De Jesus for production of documents related to leasing of office space for 101 W Main St., LLC regarding the property located at 101 W Main St., Lexington, SC.	I.B.	0.20	\$30.00
11/13/2023	Drafted Exhibit A to Subpoena to Gabriel De Jesus for production of documents related to leasing of office space for 101 W Main St., LLC regarding the property located at 101 W Main St., Lexington, SC.	I.B.	0.20	\$30.00
11/13/2023	Drafted Cover Letter to Subpoena for Documents Production to First Community Bank.	I.B.	0.20	\$30.00
11/13/2023	Drafted Cover Letter to Subpoena for Documents Production to Gabriel De Jesus.	I.B.	0.20	\$30.00
11/14/2023	Follow up with Ann Gunniffe regarding the depositions for 12/14/2023 in Columbia.	I.B.	0.10	\$15.00
11/15/2023	Updated file with courts Form 4 regarding Motions to Compel. Emailed Hal and Jenna.	I.B.	0.20	\$30.00
11/15/2023	Called clerk of court regarding Motion to Compel against Robert Motley. Left a message.	I.B.	0.10	\$15.00

TOTAL FEES**3.60****\$540.00****TOTAL COSTS****\$0.00****TOTAL THIS INVOICE****\$540.00****BALANCE FORWARD****\$0.00****PAYMENTS APPLIED****TOTAL AMOUNT DUE****\$540.00***Trust Balance***\$0.00**

Cobb Dill & Hammett, LLC
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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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Date: November 15, 2023
Invoice No.: 37550

REMITTANCE

FEES	\$540.00
COSTS	<u>\$0.00</u>
TOTAL THIS INVOICE	\$540.00
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$540.00</u>
TRUST BALANCE	\$0.00

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ROA 1567

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007



INVOICE

1221 Bower, LLC

Invoice Date
Invoice Number

December 01, 2023
37823

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due fourteen (14) days following the date of this invoice. For services rendered and expenses paid on your behalf through 12/1/2023:

11/13/2023	Motion to Complete, call with Ben, call with AJ, hearing and resolution on two and continuation on one, set new dates for depositions	H.E.C.	2.60	\$435.50
11/17/2023	Scheduled Motion to Compel hearing.	T.P.	0.10	\$15.00
11/20/2023	Finalized and emailed subpoenas for depositions for Robert Motley and Jessica Colby.	T.P.	0.20	\$30.00
11/27/2023	E-Filed Affidavit of Service regarding Ms. Colby for December 14 deposition.	T.P.	0.10	\$15.00
TOTAL FEES			3.00	\$495.50
11/27/2023	VPS Invoice. VPL-2023001285 \$75.40			\$75.40
TOTAL COSTS				\$75.40
TOTAL THIS INVOICE				\$570.90
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$570.90</u>
<i>Trust Balance</i>				<i>\$0.00</i>

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Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

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December 01, 2023
37823

REMITTANCE

FEES	\$495.50
COSTS	<u>\$75.40</u>
TOTAL THIS INVOICE	\$570.90
BALANCE FORWARD	\$0.00
PAYMENTS APPLIED	
<u>TOTAL AMOUNT DUE</u>	<u>\$570.90</u>
TRUST BALANCE	\$0.00

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ANDREWS, LLC
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Mt. Pleasant, SC 29464
P (843) 936-6680
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INVOICE

1221 Bower, LLC

Invoice Date December 12, 2023
Invoice Number 38028

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 12/12/2023:

11/28/2023	Jessica Colby depo questions	J.D.	1.40	\$385.00
12/1/2023	Call with AJL and HEC	J.D.	0.20	\$33.50
12/1/2023	Jessica Colby deposition exhibits	J.D.	0.40	\$67.00
12/3/2023	Rob Motley deposition questions	J.D.	1.50	\$251.25
12/4/2023	Subpoenas, exhibits, cover letters, 6th supp. RFP, conversation with HEC	J.D.	2.50	\$418.75
12/4/2023	Jessica Colby deposition exhibits	J.D.	1.20	\$201.00
12/4/2023	Rob Motley deposition questions and exhibits	J.D.	1.10	\$184.25
12/4/2023	Conversation with HEC : review documents	J.D.	0.80	\$134.00
	Conversation with TCP re: serving subpoenas			
	Email to AJ with subpoenas, CLs, exhibits and 6th RFP			
12/4/2023	Opposing counsel emails re: RFP and subpoenas	J.D.	0.20	\$33.50
12/4/2023	Email correspondence with process server regarding service of subpoenas.	T.P.	0.10	\$15.00
12/4/2023	Review, edit and finale subpoenas and 6th RFP on discovery	H.E.C.	4.00	\$670.00
12/5/2023	Email correspondence with process server regarding status of service.	T.P.	0.10	\$15.00
12/5/2023	Review of IOA's supp. discovery	J.D.	2.10	\$351.75
	Drafting of subpoena and cover letter for deposition			
	Review of Rob Motley and IOA lease and email threads for RM deposition			
	Exhibits for RM deposition			
12/5/2023	Finalizing deposition questions for RM and JC	J.D.	2.10	\$351.75
	Getting documents to TCP to have Falcon serve			
12/5/2023	Rob Motley depo questions	J.D.	1.50	\$251.25
	Review of Rob Motley subpoena responses			
	Research on corporate structure of IOA and people			

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ROA 1570

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ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

December 12, 2023

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	In the email threads			
12/5/2023	Call with AJ, review supplies disco, review 101. West purchase and lease in depth for depo, email with Ben [REDACTED]	H.E.C.	3.00	\$502.50
12/6/2023	Email correspondence with opposing counsel regarding court reporter.	T.P.	0.10	\$15.00
12/6/2023	Downloading all JC emails	J.D.	1.20	\$201.00
	Printing			
	Scanning			
	Sending to opposing counsel			
12/6/2023	Email correspondence with court reporter and process server.	T.P.	0.10	\$15.00
12/6/2023	Meeting with HEC re: deposition questions, discovery, supp. discovery reconciliation	J.D.	1.50	\$251.25
12/6/2023	Emails with Ben and Ann	J.D.	0.30	\$50.25
12/6/2023	Deposition questions for RM	J.D.	1.20	\$201.00
	Conversation with TCP re: discovery reconciliation			
12/6/2023	Additional depo prep	H.E.C.	1.00	\$167.50
12/6/2023	Depo prep; emails with Ben and Ann, discovery prep on depo questions	H.E.C.	1.80	\$301.50
12/7/2023	RM deposition prep	J.D.	1.20	\$201.00
12/7/2023	Organizing discovery requests.	T.P.	2.50	\$375.00
12/7/2023	Resending discovery request to opposing counsel.	T.P.	0.50	\$75.00
12/7/2023	Email with Ben re Jessica Colby and exhibits for her deposition	H.E.C.	0.50	\$83.75
12/8/2023	Gathering discovery requests.	T.P.	1.00	\$150.00
12/11/2023	Discovery review	J.D.	1.70	\$284.75
	Jessica Colby email threads review			
	P's supp. discovery re: jessica colby review			
	deposition prep			
	TOTAL FEES		36.80	\$6,237.50
12/5/2023	VPS Solutions invoice, invoice #VPL-2023001324			\$135.00
12/5/2023	VPS Solutions invoice, invoice #VPL-2023001323			\$135.00
12/6/2023	VPS Solutions invoice, Invoice #VPL-2023001325			\$135.00
	TOTAL COSTS			\$405.00
	TOTAL THIS INVOICE			\$6,642.50
	BALANCE FORWARD			\$0.00
	PAYMENTS APPLIED			

TOTAL AMOUNT DUE

\$6,642.50

Trust Balance

\$0.00



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INVOICE

1221 Bower, LLC

Invoice Date December 22, 2023
Invoice Number 38150

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 12/22/2023:

12/11/2023	Review new disco and prep for depositions	H.E.C.	0.80	\$134.00
12/12/2023	Discovery to Ann	J.D.	0.40	\$67.00
12/12/2023	Finalization of depo questions and exhibits	J.D.	2.00	\$335.00
	Discussion with HEC			
	Print in triplicate			
12/12/2023	Review of discovery request from IOA	J.D.	0.70	\$117.25
	Discussion with HEC			
	Review of HEC email			
12/12/2023	Review of all P's interrogatories to ensure they have not exceeded 50	J.D.	0.60	\$100.50
12/13/2023	Telephone conference with Anne Cuniffe regarding tomorrow's deposition.	T.P.	0.20	\$30.00
12/13/2023	Clean up on depo questions	J.D.	1.00	\$167.50
	Exhibits emailed to OC			
	Began interrogatory response			
12/13/2023	Deposition prep	J.D.	0.90	\$150.75
12/13/2023	Review new disco requests, email to AJ and reveal AJ's responses	H.E.C.	1.00	\$167.50
12/13/2023	Depos of AJ Leone (defending) Jessica Colby (taking) and Rob Motley (taking)	H.E.C.	8.00	\$1,340.00
12/14/2023	Depositions	J.D.	13.00	\$2,177.50
	6 AM - 7 PM			
12/14/2023	Drafting of subpoenas for David White, Rob McAlister and Braden Shockley	J.D.	1.80	\$301.50
	Drafting of cover letters for each			
	Drafting of Exhibits for production			
	Drafting of Rule 11 letter and exhibit			
	review of latest subpoenas from IOA			
	Discussion with HEC			

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ROA 1573

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

December 22, 2023
Page 2

Email to HEC				
12/15/2023	Emails with TCP re: subpoenas	J.D.	0.20	\$33.50
12/15/2023	Updating subpoenas and preparing them to be served.	T.P.	0.20	\$30.00
12/15/2023	Emailed Rule 11 and subpoenas to opposing counsel.	T.P.	0.10	\$15.00
12/19/2023	Motion to Quash discussion with clerk TP	J.D.	0.30	\$50.25
12/19/2023	Emailing Affidavit of Service for David White.	T.P.	0.10	\$15.00
12/19/2023	Emails re: subpoenas with Ben, AJ, and George, review MTQ	H.E.C.	1.00	\$167.50
12/21/2023	Updating subpoena and sending to process server to be served and emailing a copy to opposing counsel.	T.P.	0.30	\$45.00
12/21/2023	Receiving and scheduling Notice of Trial.	T.P.	0.10	\$15.00
12/21/2023	Foundry production shared with Ben and Ann and AJ	J.D.	0.30	\$50.25
12/22/2023	Received Plaintiff's Motion to Compel and sent to client.	T.P.	0.20	\$30.00
TOTAL FEES			33.20	\$5,540.00
12/15/2023	postage to Ellis L. and Benjamin J. cert. ret. rec.			\$9.49
12/19/2023	VPS Invoice -2023001377. \$90.00.			\$90.00
TOTAL COSTS				\$99.49
TOTAL THIS INVOICE				\$5,639.49
BALANCE FORWARD				\$0.00
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$5,639.49</u>
<i>Trust Balance</i>				<i>\$0.00</i>



COBB HAMMETT SCAPELLATO
ANDREWS, LLC
222 West Coleman Boulevard
Mt. Pleasant, SC 29464
P (843) 936-6680
www.chsalaw.com

INVOICE

1221 Bower, LLC

Invoice Date December 29, 2023
Invoice Number 38341

Client: 1221 Bower, LLC

Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 12/29/2023:

12/21/2023	Email court, review discovery to date	H.E.C.	1.00	\$167.50
12/22/2023	call with HEC re: motion to compel	J.D.	0.50	\$83.75
	Public index search			
	Review of filing			
12/22/2023	Review Foundry discovery, email Rule 11 to Ben, request MTC filed to be rescinded, call with AJ	H.E.C.	1.50	\$251.25
12/27/2023	Reviewing subpoena production requests to parties.	T.P.	0.20	\$30.00
12/28/2023	MTC drafting	J.D.	1.80	\$301.50
12/28/2023	Review of Rob Motley deposition transcript	J.D.	1.50	\$251.25
12/28/2023	Discussion with Hal re MTC and MTQ	J.D.	0.30	\$50.25
12/28/2023	Phone call with HEC re: MTC	J.D.	0.10	\$16.75
12/28/2023	Continued drafting of MTC	J.D.	1.60	\$268.00
12/29/2023	Discussion with HEC re: MTC	J.D.	0.40	\$67.00
12/29/2023	Reviewing Foundry production and pulling all relevant emails	J.D.	1.20	\$201.00
12/29/2023	Locating emails to include as MTC exhibits and printing	J.D.	0.70	\$117.25
12/29/2023	Redlining MTC with HEC	J.D.	0.60	\$100.50
12/29/2023	Added section on second rule 11 notice to MTC	J.D.	0.70	\$117.25
12/29/2023	Compilation of exhibits A-Q	J.D.	1.90	\$318.25
12/29/2023	Calls and emails with TCP re filing MTC and MTQ	J.D.	0.30	\$50.25
12/29/2023	Case update meeting with HEC re things we need to get to Plaintiff	J.D.	0.50	\$83.75
12/29/2023	Invoices and redaction for request from Plaintiff	J.D.	1.50	\$251.25
12/29/2023	Edits to MTQ	J.D.	0.50	\$83.75
12/29/2023	Condensing file exhibit to file (too large to file as is)	J.D.	0.30	\$50.25
12/29/2023	Preparing Exhibits A through Q to be filed with Clerk's office.	T.P.	1.00	\$150.00
12/29/2023	E-Filing Motion to Compel and Motion to Quash	T.P.	0.20	\$30.00

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ROA 1575

ELECTRONICALLY FILED - 2024 Feb 01 5:22 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007
ELECTRONICALLY FILED - 2024 Feb 29 2:14 PM - LEXINGTON - COMMON PLEAS - CASE#2020CP3204007

with Court.

TOTAL FEES	18.30	\$3,040.75
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TOTAL COSTS		\$0.00
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TOTAL THIS INVOICE		\$3,040.75
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BALANCE FORWARD		\$5,639.49
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PAYMENTS APPLIED

<u>TOTAL AMOUNT DUE</u>		<u>\$8,680.24</u>
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<i>Trust Balance</i>		<i>\$0.00</i>
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INVOICE

1221 Bower, LLC

Invoice Date January 12, 2024
Invoice Number 38688

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 1/12/2024:

12/27/2023	Disco prep work and responses	H.E.C.	3.00	\$502.50
12/28/2023	Disco work (misc. emails and review of issues with Ben's clients and Foundry responses)	H.E.C.	2.50	\$418.75
1/1/2024	Call with AJ, reply to Ann and review cost set provided in discovery form subpoena	H.E.C.	1.50	\$251.25
1/2/2024	Review of AJ notes on supp. discovery	J.D.	0.20	\$33.50
1/2/2024	Email correspondence with Court regarding proposed hearing for January 9, 2024.	T.P.	0.10	\$15.00
1/2/2024	Email to closing attorney Mr. Graham regarding status of subpoenaed records.	T.P.	0.10	\$15.00
1/2/2024	Email correspondence with court reporter for upcoming deposition.	T.P.	0.20	\$30.00
1/2/2024	Motion in limine drafting	J.D.	3.80	\$636.50
1/2/2024	Conversation with TCP re: court reporter for GS deposition on 1/10	J.D.	0.20	\$33.50
1/2/2024	Research on caselaw re: confusing the issues and misleading the jury	J.D.	1.60	\$268.00
1/2/2024	Call with AJ, email with Ann re subpoena updates, call with Michael Graham on 101 West Moan Street closing package.	H.E.C.	1.40	\$234.50
1/3/2024	Email correspondence clerk regarding status of motions.	T.P.	0.10	\$15.00
1/3/2024	E-Filing Affidavit of Service.	T.P.	0.10	\$15.00
1/3/2024	Review of JC deposition transcript, highlight prejudicial comments	J.D.	0.80	\$134.00
1/3/2024	Insert statements from JC deposition into MIL	J.D.	0.50	\$83.75
1/3/2024	Meeting with Hal re: MIL	J.D.	0.60	\$100.50
1/3/2024	Trial prep work (primarily discovery matters)	H.E.C.	3.00	\$502.50
1/4/2024	Prep for MTC hearing	J.D.	0.80	\$134.00
	Hearing with HEC discussion with Judge Keesley re: condensing MTCs to 1/9			
1/4/2024	Receiving and calendaring Notice of Hearings for	T.P.	0.10	\$15.00

January 12, 2024

Page 2

	Motion to Compels, Motion to Quash			
1/4/2024	Damages spreadsheet work with HEC and phone call with HEC and AJL	J.D.	1.20	\$201.00
1/4/2024	Email to opposing counsel with HEC	J.D.	0.40	\$67.00
1/4/2024	Damages prep, RFP prep -- with HEC	J.D.	0.50	\$83.75
1/4/2024	discovery prep and hearing prep	H.E.C.	2.90	\$485.75
1/5/2024	Call to Rob McAllister with HEC	J.D.	0.10	\$16.75
1/5/2024	Review of supp. discovery provided since 12/4	J.D.	0.50	\$83.75
	Rule 11 Letter drafted and sent to opposing counsel			
1/5/2024	Review of trial witness subpoenas	J.D.	0.20	\$33.50
1/5/2024	Trial subpoenas drafting	J.D.	0.90	\$150.75
1/8/2024	Phone call with opposing counsel re: motions to compel	J.D.	0.50	\$83.75
1/8/2024	Call with HEC and email summary of opposing counsel call re: MTC	J.D.	0.30	\$50.25
1/8/2024	MTC documentation and exhibit compilation (over 500 pages)	J.D.	0.40	\$67.00
1/8/2024	Call with HEC re: emails to opposing counsel to resolve MTC	J.D.	0.20	\$33.50
1/8/2024	Review of HEC emails and opposing counsel emails re: MTC	J.D.	0.30	\$50.25
1/8/2024	MTC hearing prep and attorneys' fees file prepped for the court	J.D.	1.50	\$251.25
1/8/2024	Email correspondence with clerk regarding status of hearings.	T.P.	0.20	\$30.00
1/8/2024	MTC prep	J.D.	0.70	\$117.25
	Discussion with HEC re: MTC			
	Email to OC and Judge			
1/8/2024	Trial subpoenaed scanned and emailed to OC	J.D.	0.50	\$83.75
1/8/2024	MTC prep with HEC	J.D.	1.50	\$251.25
1/8/2024	Review file for subpoenas received and sent.	T.P.	0.50	\$75.00
1/8/2024	Hearing prep, call with AJ	H.E.C.	2.00	\$335.00
1/9/2024	Reviewing subpoenas for hearing and reviewed with JKD.	T.P.	0.40	\$60.00
1/9/2024	Hearing for 1221 Bower's 2 MTC and MTQ and IOA's MTC	J.D.	1.60	\$268.00
1/9/2024	Discussion with HEC following hearing and email to AJL	J.D.	0.50	\$83.75
1/9/2024	Call with AJL and HEC	J.D.	0.30	\$50.25
1/9/2024	Trial discussion with HEC	J.D.	1.00	\$167.50
1/9/2024	Received Form 4 regarding today's hearing.	T.P.	0.10	\$15.00
1/9/2024	1221 Hearing, discovery review, call with AJ	H.E.C.	4.00	\$670.00

January 12, 2024
Page 3

1/10/2024	Review of subpoena DT response	J.D.	0.50	\$83.75
1/10/2024	Obtained lease agreement for JKD.	T.P.	0.10	\$15.00
1/10/2024	Gerry Schauer deposition prep	J.D.	0.80	\$134.00
	Exhibits compilation and printing			
1/10/2024	Deposition of Gerry Schauer	J.D.	1.70	\$284.75
1/10/2024	Post deposition discussion with HEC re: deposition and trial strategy	J.D.	0.20	\$33.50
1/10/2024	Emailed subpoenaed responses from Graham to opposing counsel.	T.P.	0.10	\$15.00
1/10/2024	depo of Gerry Schauer and prep, trial binder edits for trial prep	H.E.C.	3.00	\$502.50
1/12/2024	Motion in Limine drafting	J.D.	1.20	\$201.00
1/12/2024	Responses to RFP with general objections and specific objections	J.D.	1.00	\$167.50
1/12/2024	Discussion with HEC re: response to RFP and Interrogatories	J.D.	1.20	\$201.00
	Review of Opposing Counsel's email			
	Finalization of response to Roggs			
	Responses emailed			
TOTAL FEES			53.60	\$8,941.25
12/27/2023	VPS Solutions invoice. Invoice #: VPL2023001376			\$90.00
12/27/2023	VPS Solutions invoice. invoice #: 2023001400			\$90.00
12/29/2023	motion to quash receipt, order ID: 152510038			\$31.74
12/29/2023	motion to compel receipt, order ID: 152518736			\$31.74
1/3/2024	EveryWorld Reporting Receipt. Job # 27770			\$1,995.00
TOTAL COSTS				\$2,238.48
TOTAL THIS INVOICE				\$11,179.73
BALANCE FORWARD				\$8,680.24
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$19,859.97</u>
<i>Trust Balance</i>				<i>\$0.00</i>

INVOICE

1221 Bower, LLC

Invoice Date January 12, 2024
Invoice Number 38688

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 1/12/2024:

12/27/2023	Disco prep work and responses	H.E.C.	3.00	\$502.50
12/28/2023	Disco work (misc. emails and review of issues with Ben's clients and Foundry responses)	H.E.C.	2.50	\$418.75
1/1/2024	Call with AJ, reply to Ann and review cost set provided in discovery form subpoena	H.E.C.	1.50	\$251.25
1/2/2024	Review of AJ notes on supp. discovery	J.D.	0.20	\$33.50
1/2/2024	Email correspondence with Court regarding proposed hearing for January 9, 2024.	T.P.	0.10	\$15.00
1/2/2024	Email to closing attorney Mr. Graham regarding status of subpoenaed records.	T.P.	0.10	\$15.00
1/2/2024	Email correspondence with court reporter for upcoming deposition.	T.P.	0.20	\$30.00
1/2/2024	Motion in limine drafting	J.D.	3.80	\$636.50
1/2/2024	Conversation with TCP re: court reporter for GS deposition on 1/10	J.D.	0.20	\$33.50
1/2/2024	Research on caselaw re: confusing the issues and misleading the jury	J.D.	1.60	\$268.00
1/2/2024	Call with AJ, email with Ann re subpoena updates, call with Michael Graham on 101 West Moan Street closing package.	H.E.C.	1.40	\$234.50
1/3/2024	Email correspondence clerk regarding status of motions.	T.P.	0.10	\$15.00
1/3/2024	E-Filing Affidavit of Service.	T.P.	0.10	\$15.00
1/3/2024	Review of JC deposition transcript, highlight prejudicial comments	J.D.	0.80	\$134.00
1/3/2024	Insert statements from JC deposition into MIL	J.D.	0.50	\$83.75
1/3/2024	Meeting with Hal re: MIL	J.D.	0.60	\$100.50
1/3/2024	Trial prep work (primarily discovery matters)	H.E.C.	3.00	\$502.50
1/4/2024	Prep for MTC hearing	J.D.	0.80	\$134.00
	Hearing with HEC discussion with Judge Keesley re: condensing MTCs to 1/9			
1/4/2024	Receiving and calendaring Notice of Hearings for	T.P.	0.10	\$15.00

January 12, 2024

Page 2

	Motion to Compels, Motion to Quash			
1/4/2024	Damages spreadsheet work with HEC and phone call with HEC and AJL	J.D.	1.20	\$201.00
1/4/2024	Email to opposing counsel with HEC	J.D.	0.40	\$67.00
1/4/2024	Damages prep, RFP prep -- with HEC	J.D.	0.50	\$83.75
1/4/2024	discovery prep and hearing prep	H.E.C.	2.90	\$485.75
1/5/2024	Call to Rob McAllister with HEC	J.D.	0.10	\$16.75
1/5/2024	Review of supp. discovery provided since 12/4	J.D.	0.50	\$83.75
	Rule 11 Letter drafted and sent to opposing counsel			
1/5/2024	Review of trial witness subpoenas	J.D.	0.20	\$33.50
1/5/2024	Trial subpoenas drafting	J.D.	0.90	\$150.75
1/8/2024	Phone call with opposing counsel re: motions to compel	J.D.	0.50	\$83.75
1/8/2024	Call with HEC and email summary of opposing counsel call re: MTC	J.D.	0.30	\$50.25
1/8/2024	MTC documentation and exhibit compilation (over 500 pages)	J.D.	0.40	\$67.00
1/8/2024	Call with HEC re: emails to opposing counsel to resolve MTC	J.D.	0.20	\$33.50
1/8/2024	Review of HEC emails and opposing counsel emails re: MTC	J.D.	0.30	\$50.25
1/8/2024	MTC hearing prep and attorneys' fees file prepped for the court	J.D.	1.50	\$251.25
1/8/2024	Email correspondence with clerk regarding status of hearings.	T.P.	0.20	\$30.00
1/8/2024	MTC prep	J.D.	0.70	\$117.25
	Discussion with HEC re: MTC			
	Email to OC and Judge			
1/8/2024	Trial subpoenaed scanned and emailed to OC	J.D.	0.50	\$83.75
1/8/2024	MTC prep with HEC	J.D.	1.50	\$251.25
1/8/2024	Review file for subpoenas received and sent.	T.P.	0.50	\$75.00
1/8/2024	Hearing prep, call with AJ	H.E.C.	2.00	\$335.00
1/9/2024	Reviewing subpoenas for hearing and reviewed with JKD.	T.P.	0.40	\$60.00
1/9/2024	Hearing for 1221 Bower's 2 MTC and MTQ and IOA's MTC	J.D.	1.60	\$268.00
1/9/2024	Discussion with HEC following hearing and email to AJL	J.D.	0.50	\$83.75
1/9/2024	Call with AJL and HEC	J.D.	0.30	\$50.25
1/9/2024	Trial discussion with HEC	J.D.	1.00	\$167.50
1/9/2024	Received Form 4 regarding today's hearing.	T.P.	0.10	\$15.00
1/9/2024	1221 Hearing, discovery review, call with AJ	H.E.C.	4.00	\$670.00

January 12, 2024
Page 3

1/10/2024	Review of subpoena DT response	J.D.	0.50	\$83.75
1/10/2024	Obtained lease agreement for JKD.	T.P.	0.10	\$15.00
1/10/2024	Gerry Schauer deposition prep	J.D.	0.80	\$134.00
	Exhibits compilation and printing			
1/10/2024	Deposition of Gerry Schauer	J.D.	1.70	\$284.75
1/10/2024	Post deposition discussion with HEC re: deposition and trial strategy	J.D.	0.20	\$33.50
1/10/2024	Emailed subpoenaed responses from Graham to opposing counsel.	T.P.	0.10	\$15.00
1/10/2024	depo of Gerry Schauer and prep, trial binder edits for trial prep	H.E.C.	3.00	\$502.50
1/12/2024	Motion in Limine drafting	J.D.	1.20	\$201.00
1/12/2024	Responses to RFP with general objections and specific objections	J.D.	1.00	\$167.50
1/12/2024	Discussion with HEC re: response to RFP and Interrogatories	J.D.	1.20	\$201.00
	Review of Opposing Counsel's email			
	Finalization of response to Roggs			
	Responses emailed			
	TOTAL FEES		53.60	\$8,941.25
12/27/2023	VPS Solutions invoice. Invoice #: VPL2023001376			\$90.00
12/27/2023	VPS Solutions invoice. invoice #: 2023001400			\$90.00
12/29/2023	motion to quash receipt, order ID: 152510038			\$31.74
12/29/2023	motion to compel receipt, order ID: 152518736			\$31.74
1/3/2024	EveryWorld Reporting Receipt. Job # 27770			\$1,995.00
	TOTAL COSTS			\$2,238.48
	TOTAL THIS INVOICE			\$11,179.73
	BALANCE FORWARD			\$8,680.24
	PAYMENTS APPLIED			
	<u>TOTAL AMOUNT DUE</u>			<u>\$19,859.97</u>
	<i>Trust Balance</i>			<i>\$0.00</i>

INVOICE

1221 Bower, LLC

Invoice Date January 30, 2024
Invoice Number 38978

Client: 1221 Bower, LLC
Matter: Insurance Office of America v. 1221 Bower, LLC

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 1/30/2024:

1/11/2024	Trial prep work, disco responses review	H.E.C.	3.00	\$502.50
1/12/2024	Trial subpoena and email to Angela Adleman	J.D.	0.20	\$33.50
1/12/2024	Review of P's MTC and email to AJL with information needed	J.D.	0.20	\$33.50
1/12/2024	Review of foundry production and pulling exhibits therefrom for trial exhibits	J.D.	0.60	\$100.50
1/12/2024	Discussion with HEC, AJL and TCP re: trinity partners as trial witness	J.D.	0.20	\$33.50
1/12/2024	Compilation of anticipated IOA motions in limine for trial and strategizing	J.D.	0.70	\$117.25
1/12/2024	Discussion with HEC re: MIL Edits to MIL	J.D.	2.10	\$351.75
1/12/2024	Search through interrogatories and supplements to see if we named trinity partners as a potential trial witness	J.D.	0.50	\$83.75
1/12/2024	Reviewing file for discovery responses.	T.P.	0.50	\$75.00
1/12/2024	Preparing for trial; sorting matching exhibits; discussion with HC (SATURDAY)	C.L.	5.00	\$837.50
1/14/2024	Draft edits to MIL and pre-trial brief update	H.E.C.	6.00	\$1,005.00
1/15/2024	Motion in Limine edits and final review Emails with WH Call with HEC re: trial prep	J.D.	0.80	\$134.00
1/15/2024	Supp. interrogatory naming Geoservices and Rob Lapin as trial witnesses, explanation of anticipated witness testimony	J.D.	0.60	\$100.50
1/15/2024	Timeline work	J.D.	0.40	\$67.00
1/15/2024	Subpoenas, cover letters, exhibits to Rob Lapin and Dave Dunnagan	J.D.	0.60	\$100.50
1/15/2024	Phone call with HEC re: trial subpoenas Emails to Rob Lapin and Dave Dunnagan	J.D.	0.30	\$50.25
1/15/2024	Review timeline, work updated subpoenas and	H.E.C.	3.00	\$502.50

January 30, 2024

Page 2

	rogues for trial prep, trial binder edits			
1/16/2024	Review of IOA termination letter	J.D.	0.80	\$134.00
	Trial prep with HEC			
	Email with HEC to AJL			
1/16/2024	Drafting Notice of Transfer within firm for JKP and filing with Court.	T.P.	0.20	\$30.00
1/16/2024	Trial prep	J.D.	5.00	\$837.50
	Exhibits work through			
	Foundry production exhibit pulling for trial			
	AA witness questions fleshing out			
1/16/2024	Draft of Affidavit of Attorney's fees -- to complete Friday before trial with updates attorney's fees	J.D.	0.50	\$83.75
1/16/2024	Trial prep, updating exhibits list, adding exhibits to DD, AA and RM	J.D.	1.50	\$251.25
1/16/2024	Trial prep and pre-trial motion work	H.E.C.	4.00	\$670.00
1/17/2024	Email correspondence with Ann Cunniffe regarding court reporter for Gerry Schaefer's deposition.	T.P.	0.10	\$15.00
1/17/2024	Review of trial roster and emailed clerk regarding jury list.	T.P.	0.20	\$30.00
1/17/2024	Drafting of affidavit of attorneys fees	J.D.	0.50	\$83.75
	Discussion with TCP re: updating \$ amounts			
	Discussion with KF re: updated invoices			
1/17/2024	Pre-trial brief edits	J.D.	0.50	\$83.75
1/17/2024	Updated exhibit list and witness list	J.D.	1.20	\$201.00
1/17/2024	Trial prep with HEC	J.D.	1.50	\$251.25
1/17/2024	MIL exhibits	J.D.	0.70	\$117.25
	All pre trial materials to file finalized			
1/17/2024	Assisting with scanning exhibits for trial.	T.P.	0.20	\$30.00
1/17/2024	Exhibit notes for Hal to review and study and match with witness questions	J.D.	1.80	\$301.50
	Physical to digital of all exhibits			
1/17/2024	Review of P's supp. production	J.D.	0.50	\$83.75
1/17/2024	Conversation with TCP re: filing pre trial motions, pre-trial brief, etc	J.D.	0.20	\$33.50
1/17/2024	E-Filing Motion in Limine, Trial Brief, and other trial documents.	T.P.	0.20	\$30.00
1/17/2024	Trial prep	J.D.	1.50	\$251.25
	New exhibits in triplicate			
	organizing exhibits			
1/17/2024	Trial prep - finalize motions and call with AJ as well as exhibit finalization and move towards trial binder / trial script finalization	H.E.C.	8.00	\$1,340.00

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1/18/2024	Trial Prep	J.D.	1.50	\$251.25
	Discussion with clerk re: organization for easy exhibit access			
	Discussion with HEC re: settlement			
	Work on trial binder and timeline of plumbers			
	Exhibits for damages to present AJ with			
1/18/2024	Pre trial binder work	J.D.	1.00	\$167.50
1/18/2024	Trial prep, witness questions, exhibit numbering for each witness, digital file for HEC, exhibit matching with questions for AA	J.D.	6.00	\$1,005.00
1/18/2024	Reviewing bills and making edits to Attorney Fee Affidavit.	T.P.	1.00	\$150.00
1/18/2024	Trial prep	J.D.	1.00	\$167.50
	Motion to compel production into Box folder and scheduled send to OC			
1/18/2024	Trial prep	H.E.C.	6.00	\$1,005.00
1/18/2024	Review of MTC production from AJL	J.D.	0.60	\$100.50
1/19/2024	1221 Bower	H.E.C.	7.00	\$1,172.50
1/19/2024	Began reviewing pleadings; discussion with HC	C.L.	0.80	\$134.00
1/19/2024	Review of pre-trial brief	C.L.	0.50	\$83.75
1/19/2024	Supp discovery to OC	J.D.	0.10	\$16.75
1/19/2024	Discussion with HC	C.L.	0.20	\$33.50
1/19/2024	Review of Pre-trial brief; lease and pleadings	C.L.	0.50	\$83.75
1/19/2024	Reviewing trial binder	C.L.	1.00	\$167.50
1/19/2024	Received Motion to Exclude Rob Lapin.	T.P.	0.10	\$15.00
1/19/2024	Received Plaintiff's Motion in Limine.	T.P.	0.10	\$15.00
1/19/2024	Preparing and organizing trial exhibits	C.L.	5.00	\$837.50
1/19/2024	Preparing for trial; drafting witness questions for Chrissy Warner drive to Columbia	C.L.	3.00	\$502.50
1/19/2024	Reviewing file	C.L.	1.00	\$167.50
1/19/2024	Review of complaint; preparing and organizing exhibits; review of witness questions	C.L.	4.00	\$670.00
1/20/2024	Trial prep	H.E.C.	5.00	\$837.50
1/21/2024	Received Plaintiff's Pre-Trial and second Motion for Limine.	T.P.	0.10	\$15.00
1/21/2024	Trial prep	H.E.C.	7.00	\$1,172.50
1/22/2024	Reviewed subpoenaed production for trial.	T.P.	0.20	\$30.00
1/22/2024	Preparing with HC; discussion with HC; Pre-trial motions; jury selection	C.L.	11.00	\$1,842.50
1/22/2024	Editing the trial script for AJ	C.L.	0.30	\$50.25
1/22/2024	Trial	H.E.C.	14.00	\$2,345.00
1/23/2024	Trial; trial prep; discussion with HC and AJ Leone	C.L.	10.00	\$1,675.00

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1/23/2024	Trial	H.E.C.	12.00	\$2,010.00
1/24/2024	Preparing exhibits for scott berry, Chrissy Warner, and Angela	C.L.	1.10	\$184.25
1/24/2024	Preparing questions for Chrissy Warner; running through questions with HC	C.L.	2.20	\$368.50
1/24/2024	Preparing questions for Angela Adleman	C.L.	0.80	\$134.00
1/24/2024	Trial preparing	C.L.	9.00	\$1,507.50
1/24/2024	Trial	H.E.C.	12.50	\$2,093.75
1/25/2024	Trial; trial prep	C.L.	9.00	\$1,507.50
1/25/2024	Preparing powerpoint for closing	C.L.	3.00	\$502.50
1/25/2024	Trial	H.E.C.	14.00	\$2,345.00
1/26/2024	Creating and drafting powerpoint for closing arguments	C.L.	4.00	\$670.00
1/26/2024	Reviewing opening argument with HC	C.L.	1.00	\$167.50
1/26/2024	Trial; prep for trial and preparation with HC regarding powerpoint	C.L.	10.00	\$1,675.00
1/26/2024	Trial	H.E.C.	14.00	\$2,345.00
1/29/2024	Driving back from Columbia; discussion with HC	C.L.	2.00	\$335.00
1/29/2024	Hearing	C.L.	1.00	No Charge
TOTAL FEES			237.40	\$39,546.25
1/17/2024	Court Reporting receipt. Invoice number:6807			\$632.84
1/17/2024	e-filing for motion/in limine. order ID: 153179148			\$31.74
TOTAL COSTS				\$664.58
TOTAL THIS INVOICE				\$40,210.83
BALANCE FORWARD				\$19,859.97
PAYMENTS APPLIED				
<u>TOTAL AMOUNT DUE</u>				<u>\$60,070.80</u>
<i>Trust Balance</i>				<i>\$0.00</i>



COBB HAMMETT SCAPELLATO
ANDREWS, LLC
222 West Coleman Boulevard
Mt. Pleasant, SC 29464
P (843) 936-6680
www.chsalaw.com

INVOICE

1221 Bower, LLC

Invoice Date February 01, 2024
Invoice Number Pre-bill

Client: **1221 Bower, LLC**
Matter: **Insurance Office of America v. 1221 Bower, LLC**

Payments are due thirty (30) days following the date of this invoice. For services rendered and expenses paid on your behalf through 2/1/2024:

12/27/2023	Reviewing subpoena production requests to parties.	T.P.	0.20	\$30.00
12/27/2023	Disco prep work and responses	H.E.C.	3.00	\$502.50
12/28/2023	MTC drafting	J.D.	1.80	\$301.50
12/28/2023	Review of Rob Motley deposition transcript	J.D.	1.50	\$251.25
12/28/2023	Discussion with Hal re MTC and MTQ	J.D.	0.30	\$50.25
12/28/2023	Phone call with HEC re: MTC	J.D.	0.10	\$16.75
12/28/2023	Continued drafting of MTC	J.D.	1.60	\$268.00
12/28/2023	Disco work (misc. emails and review of issues with Ben's clients and Foundry responses)	H.E.C.	2.50	\$418.75
12/29/2023	Discussion with HEC re: MTC	J.D.	0.40	\$67.00
12/29/2023	Reviewing Foundry production and pulling all relevant emails	J.D.	1.20	\$201.00
12/29/2023	Locating emails to include as MTC exhibits and printing	J.D.	0.70	\$117.25
12/29/2023	Redlining MTC with HEC	J.D.	0.60	\$100.50
12/29/2023	Added section on second rule 11 notice to MTC	J.D.	0.70	\$117.25
12/29/2023	Compilation of exhibits A-Q	J.D.	1.90	\$318.25
12/29/2023	Calls and emails with TCP re filing MTC and MTQ	J.D.	0.30	\$50.25
12/29/2023	Case update meeting with HEC re things we need to get to Plaintiff	J.D.	0.50	\$83.75
12/29/2023	Invoices and redaction for request from Plaintiff	J.D.	1.50	\$251.25
12/29/2023	Edits to MTQ	J.D.	0.50	\$83.75
12/29/2023	Condensing file exhibit to file (too large to file as is)	J.D.	0.30	\$50.25
12/29/2023	Preparing Exhibits A through Q to be filed with Clerk's office.	T.P.	1.00	\$150.00
12/29/2023	E-Filing Motion to Compel and Motion to Quash with Court.	T.P.	0.20	\$30.00
1/1/2024	Call with AJ, reply to Ann and review cost set provided in discovery form subpoena	H.E.C.	1.50	\$251.25

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1/2/2024	Review of AJ notes on supp. discovery	J.D.	0.20	\$33.50
1/2/2024	Email correspondence with Court regarding proposed hearing for January 9, 2024.	T.P.	0.10	\$15.00
1/2/2024	Email to closing attorney Mr. Graham regarding status of subpoenaed records.	T.P.	0.10	\$15.00
1/2/2024	Email correspondence with court reporter for upcoming deposition.	T.P.	0.20	\$30.00
1/2/2024	Motion in limine drafting	J.D.	3.80	\$636.50
1/2/2024	Conversation with TCP re: court reporter for GS deposition on 1/10	J.D.	0.20	\$33.50
1/2/2024	Research on caselaw re: confusing the issues and misleading the jury	J.D.	1.60	\$268.00
1/2/2024	Call with AJ, email with Ann re subpoena updates, call with Michael Graham on 101 West Moan Street closing package.	H.E.C.	1.40	\$234.50
1/3/2024	Email correspondence clerk regarding status of motions.	T.P.	0.10	\$15.00
1/3/2024	E-Filing Affidavit of Service.	T.P.	0.10	\$15.00
1/3/2024	Review of JC deposition transcript, highlight prejudicial comments	J.D.	0.80	\$134.00
1/3/2024	Insert statements from JC deposition into MIL	J.D.	0.50	\$83.75
1/3/2024	Meeting with Hal re: MIL	J.D.	0.60	\$100.50
1/3/2024	Trial prep work (primarily discovery matters)	H.E.C.	3.00	\$502.50
1/4/2024	Prep for MTC hearing	J.D.	0.80	\$134.00
	Hearing with HEC discussion with Judge Keesley re: condensing MTCs to 1/9			
1/4/2024	Receiving and calendaring Notice of Hearings for Motion to Compels, Motion to Quash	T.P.	0.10	\$15.00
1/4/2024	Damages spreadsheet work with HEC and phone call with HEC and AJL	J.D.	1.20	\$201.00
1/4/2024	Email to opposing counsel with HEC	J.D.	0.40	\$67.00
1/4/2024	Damages prep, RFP prep -- with HEC	J.D.	0.50	\$83.75
1/4/2024	discovery prep and hearing prep	H.E.C.	2.90	\$485.75
1/5/2024	Call to Rob McAllister with HEC	J.D.	0.10	\$16.75
1/5/2024	Review of supp. discovery provided since 12/4	J.D.	0.50	\$83.75
	Rule 11 Letter drafted and sent to opposing counsel			
1/5/2024	Review of trial witness subpoenas	J.D.	0.20	\$33.50
1/5/2024	Trial subpoenas drafting	J.D.	0.90	\$150.75
1/8/2024	Phone call with opposing counsel re: motions to compel	J.D.	0.50	\$83.75
1/8/2024	Call with HEC and email summary of opposing counsel call re: MTC	J.D.	0.30	\$50.25
1/8/2024	MTC documentation and exhibit compilation (over	J.D.	0.40	\$67.00

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	500 pages)			
1/8/2024	Call with HEC re: emails to opposing counsel to resolve MTC	J.D.	0.20	\$33.50
1/8/2024	Review of HEC emails and opposing counsel emails re: MTC	J.D.	0.30	\$50.25
1/8/2024	MTC hearing prep and attorneys' fees file prepped for the court	J.D.	1.50	\$251.25
1/8/2024	Email correspondence with clerk regarding status of hearings.	T.P.	0.20	\$30.00
1/8/2024	MTC prep	J.D.	0.70	\$117.25
	Discussion with HEC re: MTC			
	Email to OC and Judge			
1/8/2024	Trial subpoenaed scanned and emailed to OC	J.D.	0.50	\$83.75
1/8/2024	MTC prep with HEC	J.D.	1.50	\$251.25
1/8/2024	Review file for subpoenas received and sent.	T.P.	0.50	\$75.00
1/8/2024	Hearing prep, call with AJ	H.E.C.	2.00	\$335.00
1/9/2024	Reviewing subpoenas for hearing and reviewed with JKD.	T.P.	0.40	\$60.00
1/9/2024	Hearing for 1221 Bower's 2 MTC and MTQ and IOA's MTC	J.D.	1.60	\$268.00
1/9/2024	Discussion with HEC following hearing and email to AJL	J.D.	0.50	\$83.75
1/9/2024	Call with AJL and HEC	J.D.	0.30	\$50.25
1/9/2024	Trial discussion with HEC	J.D.	1.00	\$167.50
1/9/2024	Received Form 4 regarding today's hearing.	T.P.	0.10	\$15.00
1/9/2024	1221 Hearing, discovery review, call with AJ	H.E.C.	4.00	\$670.00
1/10/2024	Review of subpoena DT response	J.D.	0.50	\$83.75
1/10/2024	Obtained lease agreement for JKD.	T.P.	0.10	\$15.00
1/10/2024	Gerry Schauer deposition prep	J.D.	0.80	\$134.00
	Exhibits compilation and printing			
1/10/2024	Deposition of Gerry Schauer	J.D.	1.70	\$284.75
1/10/2024	Post deposition discussion with HEC re: deposition and trial strategy	J.D.	0.20	\$33.50
1/10/2024	Emailed subpoenaed responses from Graham to opposing counsel.	T.P.	0.10	\$15.00
1/10/2024	depo of Gerry Schauer and prep, trial binder edits for trial prep	H.E.C.	3.00	\$502.50
1/11/2024	Trial prep work, disco responses review	H.E.C.	3.00	\$502.50
1/12/2024	Motion in Limine drafting	J.D.	1.20	\$201.00
1/12/2024	Responses to RFP with general objections and specific objections	J.D.	1.00	\$167.50
1/12/2024	Discussion with HEC re: response to RFP and Interrogatories	J.D.	1.20	\$201.00

	Review of Opposing Counsel's email			
	Finalization of response to Roggs			
	Responses emailed			
1/12/2024	Trial subpoena and email to Angela Adleman	J.D.	0.20	\$33.50
1/12/2024	Review of P's MTC and email to AJL with information needed	J.D.	0.20	\$33.50
1/12/2024	Review of foundry production and pulling exhibits therefrom for trial exhibits	J.D.	0.60	\$100.50
1/12/2024	Discussion with HEC, AJL and TCP re: trinity partners as trial witness	J.D.	0.20	\$33.50
1/12/2024	Compilation of anticipated IOA motions in limine for trial and strategizing	J.D.	0.70	\$117.25
1/12/2024	Discussion with HEC re: MIL	J.D.	2.10	\$351.75
	Edits to MIL			
1/12/2024	Search through interrogatories and supplements to see if we named trinity partners as a potential trial witness	J.D.	0.50	\$83.75
1/12/2024	Reviewing file for discovery responses.	T.P.	0.50	\$75.00
1/12/2024	Preparing for trial; sorting matching exhibits; discussion with HC (SATURDAY)	C.L.	5.00	\$837.50
1/14/2024	Draft edits to MIL and pre-trial brief update	H.E.C.	6.00	\$1,005.00
1/15/2024	Motion in Limine edits and final review	J.D.	0.80	\$134.00
	Emails with WH			
	Call with HEC re: trial prep			
1/15/2024	Supp. interrogatory naming Geoservices and Rob Lapin as trial witnesses, explanation of anticipated witness testimony	J.D.	0.60	\$100.50
1/15/2024	Timeline work	J.D.	0.40	\$67.00
1/15/2024	Subpoenas, cover letters, exhibits to Rob Lapin and Dave Dunnagan	J.D.	0.60	\$100.50
1/15/2024	Phone call with HEC re: trial subpoenas	J.D.	0.30	\$50.25
	Emails to Rob Lapin and Dave Dunnagan			
1/15/2024	Review timeline, work updated subpoenas and rogues for trial prep, trial binder edits	H.E.C.	3.00	\$502.50
1/16/2024	Review of IOA termination letter	J.D.	0.80	\$134.00
	Trial prep with HEC			
	Email with HEC to AJL			
1/16/2024	Drafting Notice of Transfer within firm for JKP and filing with Court.	T.P.	0.20	\$30.00
1/16/2024	Trial prep	J.D.	5.00	\$837.50
	Exhibits work through			
	Foundry production exhibit pulling for trial			
	AA witness questions fleshing out			

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1/16/2024	Draft of Affidavit of Attorney's fees -- to complete Friday before trial with updates attorney's fees	J.D.	0.50	\$83.75
1/16/2024	Trial prep, updating exhibits list, adding exhibits to DD, AA and RM	J.D.	1.50	\$251.25
1/16/2024	Trial prep and pre-trial motion work	H.E.C.	4.00	\$670.00
1/17/2024	Email correspondence with Ann Cuniffe regarding court reporter for Gerry Schaefer's deposition.	T.P.	0.10	\$15.00
1/17/2024	Review of trial roster and emailed clerk regarding jury list.	T.P.	0.20	\$30.00
1/17/2024	Drafting of affidavit of attorneys fees	J.D.	0.50	\$83.75
	Discussion with TCP re: updating \$ amounts			
	Discussion with KF re: updated invoices			
1/17/2024	Pre-trial brief edits	J.D.	0.50	\$83.75
1/17/2024	Updated exhibit list and witness list	J.D.	1.20	\$201.00
1/17/2024	Trial prep with HEC	J.D.	1.50	\$251.25
1/17/2024	MIL exhibits	J.D.	0.70	\$117.25
	All pre trial materials to file finalized			
1/17/2024	Assisting with scanning exhibits for trial.	T.P.	0.20	\$30.00
1/17/2024	Exhibit notes for Hal to review and study and match with witness questions	J.D.	1.80	\$301.50
	Physical to digital of all exhibits			
1/17/2024	Review of P's supp. production	J.D.	0.50	\$83.75
1/17/2024	Conversation with TCP re: filing pre trial motions, pre-trial brief, etc	J.D.	0.20	\$33.50
1/17/2024	E-Filing Motion in Limine, Trial Brief, and other trial documents.	T.P.	0.20	\$30.00
1/17/2024	Trial prep	J.D.	1.50	\$251.25
	New exhibits in triplicate			
	organizing exhibits			
1/17/2024	Trial prep - finalize motions and call with AJ as well as exhibit finalization and move towards trial binder / trial script finalization	H.E.C.	8.00	\$1,340.00
1/18/2024	Trial Prep	J.D.	1.50	\$251.25
	Discussion with clerk re: organization for easy exhibit access			
	Discussion with HEC re: settlement			
	Work on trial binder and timeline of plumbers			
	Exhibits for damages to present AJ with			
1/18/2024	Pre trial binder work	J.D.	1.00	\$167.50
1/18/2024	Trial prep, witness questions, exhibit numbering for each witness, digital file for HEC, exhibit matching with questions for AA	J.D.	6.00	\$1,005.00
1/18/2024	Reviewing bills and making edits to Attorney Fee	T.P.	1.00	\$150.00

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	Affidavit.			
1/18/2024	Trial prep	J.D.	1.00	\$167.50
	Motion to compel production into Box folder and scheduled send to OC			
1/18/2024	Trial prep	H.E.C.	6.00	\$1,005.00
1/18/2024	Review of MTC production from AJL	J.D.	0.60	\$100.50
1/19/2024	1221 Bower	H.E.C.	7.00	\$1,172.50
1/19/2024	Began reviewing pleadings; discussion with HC	C.L.	0.80	\$134.00
1/19/2024	Review of pre-trial brief	C.L.	0.50	\$83.75
1/19/2024	Supp discovery to OC	J.D.	0.10	\$16.75
1/19/2024	Discussion with HC	C.L.	0.20	\$33.50
1/19/2024	Review of Pre-trial brief; lease and pleadings	C.L.	0.50	\$83.75
1/19/2024	Reviewing trial binder	C.L.	1.00	\$167.50
1/19/2024	Received Motion to Exclude Rob Lapin.	T.P.	0.10	\$15.00
1/19/2024	Received Plaintiff's Motion in Limine.	T.P.	0.10	\$15.00
1/19/2024	Preparing and organizing trial exhibits	C.L.	5.00	\$837.50
1/19/2024	Preparing for trial; drafting witness questions for Chrissy Warner drive to Columbia	C.L.	3.00	\$502.50
1/19/2024	Reviewing file	C.L.	1.00	\$167.50
1/19/2024	Review of complaint; preparing and organizing exhibits; review of witness questions	C.L.	4.00	\$670.00
1/20/2024	Trial prep	H.E.C.	5.00	\$837.50
1/21/2024	Received Plaintiff's Pre-Trial and second Motion for Limine.	T.P.	0.10	\$15.00
1/21/2024	Trial prep	H.E.C.	7.00	\$1,172.50
1/22/2024	Reviewed subpoenaed production for trial.	T.P.	0.20	\$30.00
1/22/2024	Preparing with HC; discussion with HC; Pre-trial motions; jury selection	C.L.	11.00	\$1,842.50
1/22/2024	Editing the trial script for AJ	C.L.	0.30	\$50.25
1/22/2024	Trial	H.E.C.	14.00	\$2,345.00
1/23/2024	Trial; trial prep; discussion with HC and AJ Leone	C.L.	10.00	\$1,675.00
1/23/2024	Trial	H.E.C.	12.00	\$2,010.00
1/24/2024	Preparing exhibits for scott berry, Chrissy Warner, and Angela	C.L.	1.10	\$184.25
1/24/2024	Preparing questions for Chrissy Warner; running through questions with HC	C.L.	2.20	\$368.50
1/24/2024	Preparing questions for Angela Adleman	C.L.	0.80	\$134.00
1/24/2024	Trial preparing	C.L.	9.00	\$1,507.50
1/24/2024	Trial	H.E.C.	12.50	\$2,093.75
1/25/2024	Trial; trial prep	C.L.	9.00	\$1,507.50
1/25/2024	Preparing powerpoint for closing	C.L.	3.00	\$502.50

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~~1/25/2024~~	~~Trial~~	~~H.E.C.~~	~~14.00~~	~~\$1,345.00~~
~~1/25/2024~~	~~Creating and drafting powerpoint for closing arguments~~	~~C.L.~~	~~4.00~~	~~\$670.00~~
~~1/25/2024~~	~~Reviewing opening argument with HO~~	~~GLE~~	~~2.00~~	~~\$107.50~~
~~1/26/2024~~	~~Trial, prep for trial and preparation with HO regarding powerpoint~~	~~GLE~~	~~10.00~~	~~\$6,875.00~~
~~1/26/2024~~	~~Trial~~	~~H.E.C.~~	~~14.00~~	~~\$2,345.00~~
~~1/26/2024~~	~~Driving back from Columbia; discussion with HO~~	~~GLE~~	~~2.00~~	~~\$535.00~~
~~1/26/2024~~	~~Hearing~~	~~G.L.~~	~~1.00~~	~~\$1,200.00~~
1/30/2024	Received filed Verdict and filed Form 4 and sent to client.	T.P.	0.20	\$30.00
1/30/2024	Draft Motion for attorney fees, call with AJ	H.E.C.	1.00	\$167.50

TOTAL FEES

~~\$97.00~~ **\$81,225.25**

~~1/23/2023~~	~~VPS Solutions invoice, invoice # VPL202304170~~	~~\$90.00~~
~~12/27/2023~~	~~VPS Solutions invoice, invoice # 9026004405~~	~~\$90.00~~
~~12/28/2023~~	~~motion to quash receipt, order ID: 152510038~~	~~\$31.50~~
~~12/29/2023~~	~~motion to quash receipt, order ID: 152518795~~	~~\$31.75~~
~~1/3/2024~~	~~EveryWord Reporting Receipt, Job # 27770~~	~~\$1,835.00~~
~~1/7/2024~~	~~Scan Reporting receipt, invoice number 6887~~	~~\$55.00~~
~~1/7/2024~~	~~Editing for motion in limine, order ID: 153179148~~	~~\$31.24~~
1/22/2024	USCONNECT SNKTM Vendwest and Snacktime.	\$46.20
1/23/2024	Rush's Lexington	\$26.92
1/23/2024	Groucho's Deli Lexington SC	\$46.54
1/23/2024	BJ's Restaurant Brewhouse Columbia, SC	\$100.28
1/23/2024	Applebees Lexington, Sc	\$61.20
1/26/2024	Best Western Lexington, SC	\$274.62
2/1/2024	Root Cellar Receipt.	\$51.60

TOTAL COSTS

~~\$3,540.42~~ **\$607.36**

TOTAL THIS INVOICE

BALANCE FORWARD

PAYMENTS APPLIED

TOTAL AMOUNT DUE

Trust Balance

\$0.00

CERTIFICATE OF COUNSEL IN RECORD ON APPEAL

THE STATE OF SOUTH CAROLINA

In the Court of Appeals

APPEAL FROM LEXINGTON COUNTY

Court of Common Pleas

Courtney Clyburn Pope, Circuit Court Judge

Appellate Case No. 2024-001585

Insurance Office of America, Inc..... Respondent

vs.

1221 Bower, LLC..... Appellant.

CERTIFICATE OF COUNSEL

The undersigned certifies that this Record on Appeal complies with Rule 210 and 267, SCACR.

s/ Jenna K. DePoy

Jenna K. DePoy, Esq.

S.C. Bar No.: 106309

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May 16, 2025
Mt. Pleasant, SC

RECEIVED

May 16 2025

SC Court of Appeals