Filing # 181494108 E-Filed 09/11/2023 10:44:56 AM

IN THE FLORIDA FOURTH DISTRICT COURT OF APPEAL

GRAND HARBOR COMMUNITYASSOCIATION, INC.,

Appellant,

vs.

GH VERO BEACH DEVELOPMENT, LLC, et al.,

Appellees.
_______________________________/

Fla. 4th DCA Case No. 4D23-1191

L.T. Case No. 312021CA000281

APPELLANT'S APPENDIX TO INITIAL BRIEF

The Appellant, Grand Harbor Community Association, Inc., provides this appendix in support of its initial brief:

Filing Date	Document	Pages
5/26/2023	"Defendant's Motion to Tax Costs Against Plaintiff" and all attachments (79 pages)	A 3-81
7/19/2023	"Plaintiff's Motion for Stay Pending Appeal" (4 pages)	A 82-85
7/20/2023	"Notice of Video/Webcast Hearing" (3 pages)	A 86-88
8/8/2023	"Defendant's Response to Plaintiff's Motion for Stay Pending Appeal" (5 pages)	A 89-93
8/22/2023	"Order Denying Plaintiff's Motion for Stay Pending Appeal" (1 page)	A 94

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof has been furnished via the Florida Courts E-Filing Portal upon: Ashley Gomez-Rodon, Esquire, Jason Domark, Esquire, and Matthew Criscuolo, Esquire, *Co-counsel for Defendants,* Cozen O'Connor, Southeast Financial Center, 200 S. Biscayne Boulevard, Suite 3000, Miami, FL 33131, agomez-rodon@cozen.com; jdomark@cozen.com; mcriscuolo@cozen.com; Joanie Phelan jphelan@cozen.com; and Herbert Beigel, Esq., *Pro Hac Vice Co-counsel for Defendants,* Law Offices of Herbert Beigel, 5641 N. Chieftan Trail, Tucson, AZ 85750, hbeigel@me.com; on this 11th day of September, 2023.

Respectfully submitted,

Edward P. de la Parte, Jr., FBN 236950
David M. Caldevilla, FBN 654248
Nicolas Q. Porter, FBN 677043
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COUNSEL FOR APPELLANT

IN THE CIRCUIT COURT OF THE 19TH JUDICIAL CIRCUIT IN AND FOR INDIAN RIVER COUNTY, FLORIDA

CIVIL DIVISION

CASE NO. 312021CA000281MB

GRAND HARBOR COMMUNITY ASSOCIATION, INC.,

Plaintiff,

vs.

GH VERO BEACH DEVELOPMENT, LLC, a Delaware LLC, CHRISTOPHER J. CLEARY, JOSEPH COLASUONNO, CHRIS CARD, MICHAEL GOSTOMSKI, and DANICA BAHADUR,

Defendants.

_______________________________________/

DEFENDANT'S MOTION TO TAX COSTS AGAINST PLAINTIFF

Defendant, GH VERO BEACH DEVELOPMENT, LLC, ("Defendant"), files this Motion to tax costs against Plaintiff GRAND HARBOR ASSOCIATION, INC. ("Plaintiff") pursuant to Florida Statute § 57.041, Florida Rule of Civil Procedure 1.525, and the Statewide Uniform Guidelines for Taxation of Costs in Civil Actions (the "Uniform Guidelines"). In support of this motion, Defendant respectfully states as follows:

1. On March 29, 2023, the Court granted Defendants' Motion for Partial Summary Judgment on Counts I and II of the Complaint. Plaintiff voluntarily dismissed Count III of the Complaint on April 27, 2023. The Court also denied Plaintiff's Motion for Rehearing on April 25, 2023. A final judgment in this action was issued pursuant to these orders on May 8, 2023. Therefore, Defendants are the prevailing party as to this action.

2. Florida Statute § 57.041(1) provides that "[t]he party recovering judgment shall recover all his or her legal costs and charges which shall be included in the judgment . . . ."

Pursuant to this provision, Defendant is entitled to recover their costs from Plaintiff. *See also Reinke v. Wal-Mart Stores, Inc.*, 773 So. 2d 592, 592 (Fla. 1st DCA 2000) ("'[I]t appears that the prevailing party in an action at law is absolutely entitled to the taxing of costs in his favor.'" (quoting *Dragstrem v. Butts*, 370 So. 2d 416, 417 (Fla. 1st DCA 1979) (alteration in original)).

3. The Uniform Guidelines group categories of costs into one of three buckets: (1) litigation costs that should be taxed as costs; (2) litigation costs that may be taxed as costs; and (3) litigation costs that should not be taxed as costs. Fla. R. Civ. P. Taxation of Costs. "The guidelines, however, are not intended to be mandatory, and the appropriate assessment of costs in any particular proceeding remains within the discretion of the trial court." *In re: Amendments to Uniform Guidelines for Taxation of Costs*, 915 So. 2d 612, 614 (Fla. 2005); *see also Madison v. Midland Nat'l Life Ins. Co.*, 648 So. 2d 1226, 1228 (Fla. 4th DCA 1995) (the trial court may deviate from the Uniform Guidelines "as justice may require").

4. The test for recovering costs is "whether the [cost] was 'reasonably necessary either to defend or prosecute the case at the time the action precipitating the cost was undertaken.'" *Paul N. Howard Co. v. Camp, Dresser, & McKee, Inc.*, 91 So. 3d 252, 253 (Fla. 5th DCA 2012) (citation omitted)); *Noel v. Broward Gen. Med. Ctr.*, 725 So. 2d 438, 439 (Fla. 4th DCA 1999) ("the trial court [is] within its broad discretion to tax those items used neither at trial nor to support a motion for summary judgment if the court concluded that the taking of such depositions was 'reasonably necessary'"); *Willey v. M.K. Roark, Inc.*, 616 So. 2d 1140, 1142-43 (Fla. 4th DCA 1993) (similar). As explained below, all costs Defendant seeks in this motion were reasonably necessary to defend the case.

I. REQUESTED COSTS BY CATEGORY

A. Depositions

5. Under Item I.A of the Uniform Guidelines, the prevailing party should recover the cost of (1) "[t]he original and one copy of the deposition and the court reporter's per diem for all depositions"; (2) "[t]he original and/or one copy of the electronic deposition, including audiovisually recorded deposition"; and (3) "[t]elephone toll and electronic conferencing charges for the conduct of telephone and electronic depositions." Fla. R. Civ. P. Taxation of Costs. The court may award costs for any deposition that "served a useful purpose" in the case, whether or not it was used in support of summary judgment or at trial. *See Se. Fla. Cable, Inc. v. Islandia I Condo. Ass'n Inc.*, 661 So. 2d 91, 92 (Fla. 4th DCA 1995) ("[T]he standard is not whether the depositions served a useful purpose at trial, but whether they served a useful purpose at all.").

6. The following depositions either served a useful purpose in Defendant's case or were requested by Plaintiff and necessary in the defense of this case. A review of the attached records (attached as **Composite Exhibit A**) reveals that Defendant's costs for these depositions amounted to $26,831.85.

Witness Name	**Witness Relevance**	**Vendor**	**Invoice Date/Invoice #**	**Cost**
Anthony Janicki	Plaintiff's expert on aquatic ecology and water quality engineering for the estuaries as part of the stormwater management system	Veritext	1/23/2023 Invoice No. 6310028 1/18/2023 Invoice No. 6302337	$1,072 (video) $1,374.55 (transcript)
Steven Peene	Plaintiff's expert for water resource analysis who provided measurements for his	Veritext	1/24/2023 Invoice No. 6311613	$1,444.90 (transcript)

	evaluations of the estuaries			
Brian Pailes	Plaintiff's expert on Bridge No. 2 who drafted a written report on field observations	Veritext	2/16/2023 Invoice No. 6364700 1/31/2023 Invoice No. 6331056	$1,550 (video) $1,282.40 (transcript)
Harvey Harper	Plaintiff's expert on water quality engineering for the stormwater management system	Veritext	2/28/2023 Invoice No. 6391166 2/23/2023 Invoice No. 6384644	$1,906.55 (transcript) $1,400 (video)
Jeff Chrisco	Plaintiff's expert on non-native vegetation, nuisance vegetation, and invasive vegetation species	Veritext	2/21/2023 Invoice No. 6377828 (transcript) 2/22/2023 Invoice No. 6380877 (video)	$760.25 (transcript) $844.50 (video)
Lawrence Vickers	Plaintiff's expert on non-native vegetation, nuisance vegetation, and invasive vegetation species	Veritext	2/21/2023 Invoice No. 6377828 (transcript) 2/22/2023 Invoice No. 6380877 (video)	$818.35 (transcript) $1013.50 (video)
John H. Stewart, P.E.	Plaintiff's expert on current condition of Grand Harbor common area features	Veritext	4/3/2023 Invoice No. 6472827 3/22/2023 Invoice No. 6442408 (video)	$436.45 (transcript) $543 (video)
Ray Franks	Plaintiff's expert on current condition of	Veritext	4/3/2023 Invoice No. 6472827	$999.55 (transcript)

	Grand Harbor common area features		3/22/2023 Invoice No. 6442408 (video)	$509 (video)
Francis J. Nardozza	Plaintiff's expert on capital budgets, reserves, and assessments	Veritext	3/20/2023 Invoice No. 6441499 (transcript) 3/27/2023 Invoice No. 6455919 (video)	$1254.10 (transcript) $1,081.00 (video)
Jeff Caso	Plaintiff's listed fact witness with knowledge of Plaintiff's claims	Veritext	3/9/2023 Invoice No. 6415409 3/16/2023 Invoice No. 6433099	$1,168 (video) $1076 (transcript)
Lance Hall	Plaintiff's listed fact witness with knowledge of Plaintiff's claims	Veritext	3/16/2023 Invoice No. 6433099 4/4/2023 Invoice No. 6475920 (transcript) 4/17/2023 Invoice No. 6506567 (video)	$1337.80 (transcript) $831.85 (transcript) $611.50 (video)
J. Rock Tonkel	Plaintiff's listed fact witness with knowledge of Plaintiff's claims	Veritext	4/4/2023 Invoice No. 6475920 (transcript) 4/17/2023	$549.10 (transcript) $780.50 (video)

			Invoice No. 6506567 (video)	
Danica Bahadur	Named party defendant and fact witness for Plaintiff's allegations	Veritext	3/2/2023 Invoice No. 6399942	$465.51
Christopher Cleary	Named party defendant and fact witness for Plaintiff's allegations	Veritext	3/21/2023 Invoice No. 6441160	$399.04
Michael Antinelli	Rebuttal expert for Defendant's and Plaintiff's requested deposition	Veritext	2/16/2023 Invoice No. 6366068	$1,322.45
TOTAL				**$26,831.85**

B. Expert Witnesses

7. Under Item I.C of the Uniform Guidelines, the prevailing party should recover "[a] reasonable fee for deposition and/or court testimony [of an expert witness], and the costs of preparation of any court ordered report." Fla. R. Civ. P. Taxation of Costs. This amount may include the cost for preparing an expert witness's opinion and testimony, including preparing expert reports. *See* Fla. R. Civ. P. Taxation of Costs Item II.D; *see also Bystrom v. Florida Rock Industries, Inc.*, 513 So. 2d 742, 743 (Fla. 3d DCA 1987) ("In addition to the cost of any exhibits used, the cost of time and preparation of an expert witness's opinions and testimony may be included in the taxed costs." (citing *Thursby v. Reynolds Metals Co.*, 466 So. 2d 245, 252 (Fla. 1st DCA 1984)).

8. The following experts served a useful purpose in Defendant's case or were necessary in the defense of Plaintiff's claims. A review of the attached records (attached as **Composite Exhibit B**) reveals that Defendant's costs for these experts amounted to $164,842.

Expert Name	Expert Relevance	Date of Invoice/Invoice #	Description of Work	Cost
John Kurtz	Defense expert regarding the structure of the Board of Directors of the Association and offered opinions as to customary Board practices	3/31/2023	Review of Plaintiff's expert Frank Nardozza expert report and discussion with counsel; preparation for deposition	$3,680
Michael Antinelli	Rebuttal to Plaintiff's expert witnesses, Harvey Harper, III, Anthony Janicki, Jeff Chrisco, Larry Vickers, and Steven J. Peene	2/6/2023 Invoice No. 1517 3/12/2023	Review of reports from Plaintiff's experts, discussions with defense counsel, and background research Deposition and preparation for same	$3,549 $3,274
DeSimone Consulting Engineers	Defense expert who made observations on Bridge #2 and reviewed report of Plaintiff's expert Dr. Pailes for rebuttal	12/30/2022 Invoice No. 68828 1/31/2023 Invoice No. 69039 3/6/2023 Invoice No. 69627 4/13/2023 Invoice No. 70619	Discussion and review of Plaintiff's expert report, review of project documents, report drafting, review of deposition transcripts, and preparation of expert testimony	$17,920 $49,762.50 $28,945 $56,940.50
Rimkus Consulting	Plaintiff's experts	4/18/2023 Invoice No. 6848513	Providing testimony at depositions	$771
TOTAL				**$164,842**

C. Court Reporting Costs Other than for Depositions

9. Under Item I.E of the Uniform Guidelines, the prevailing party should recover a "[r]easonable court reporter's per diem for the reporting of evidentiary hearings, trial, and post-trial hearings" for court reporting costs other than for depositions. Fla. R. Civ. P. Taxation of Costs.

10. The transcripts listed below served a useful purpose in Defendant's case. A review of the attached record (attached as **Exhibit C**) reveals that Defendant's costs for court reporting other than for depositions amounted to $1,277.50.

Hearing Description	Hearing Date	Vendor/Invoice #	Cost
Hearing on Motion for Summary Judgment	3/7/2023	Veritext, No. 6408357	$1,277.50
TOTAL			**$1,277.50**

D. Mediation

11. Under Item II.A of the Uniform Guidelines, the prevailing party may recover "costs of mediation, including mediator fees." Fla. R. Civ. P. Taxation of Costs.

12. Mediation was required pursuant to the court's Case Management Order. A review of the attached record (attached as **Exhibit D**) reveals that Defendant's costs for mediation amounted $800.

Mediation	Date	Vendor/Invoice #	Cost
Mediation with Alfred A. LaSorte, Jr.	3/8/2023	LaSorte Mediation Invoice No. 1403	$800
TOTAL			**$800**

E. Electronic Discovery Expenses

13. Under Item II.C of the Uniform Guidelines, the prevailing party may recover "[t]he cost of producing copies of relevant electronic media in response to a discovery request," and "[t]he cost of converting electronically stored information to a reasonably usable format in response to a discovery request that seeks production in such format." Fla. R. Civ. P. Taxation of Costs; *see also Collins v. Holland*, 409 So. 2d 1097, 1099 (Fla. 3d DCA 1982) ("Costs pertaining to discovery materials are generally recoverable by the prevailing party.").

14. A review of the attached records (attached as **Composite Exhibit E**) reveal that Defendant's electronic discovery expenses amounted to $132,288.31.[1]

Cost Description	Date	Vendor/Invoice #	Cost
Electronic discovery data storage on Relativity	5/9/2023	Lighthouse Global	$128,679.91
Electronic discovery data storage on Relativity	4/30/2023	Lighthouse Global	$3,608.40
TOTAL			**$132,288.31**

II. TOTAL COSTS REQUESTED

15. Totaling the costs incurred for each of the above categories, Defendant is entitled to $326,039.66 in costs.

Cost Item	Amount
Depositions	$26,831.85
Expert Witnesses	$164,842
Court Reporting Costs	$1,277.50
Mediation	$800

[1] The total amount for Defendant's electronic storage for a certain time period is $257,359.82. However, this amount represents storage of document collections and productions for two cases—this case and the Club case, Case No. 2021-CA-000308. Because both cases had overlapping witnesses and documents, the vendor charged an amount representing storage for both out of convenience except for one invoice. Thus, Defendant respectfully requests half of the costs associated with the electronic discovery expenses for that time period.

Electronic Discovery Expenses	$132,288.31
TOTAL	**$326,039.66**

WHEREFORE, Defendant respectfully requests that the Court enter an order and judgment taxing costs in their favor and against Plaintiff, in the amount of $326,039.66, and grant such further relief as the Court deems just and proper.

/s/ Jason R. Domark
Jason R. Domark (FBN 0880191)
Ashley Gomez-Rodon (FBN 1010237)
COZEN O'CONNOR
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200 South Biscayne Boulevard
Miami, FL 33131-2352
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Facsimile: (305) 704-5955
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Matthew B. Criscuolo, (FBN 58441)
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One North Clematis Street, Suite 510
West Palm Beach, Florida 33401
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and

/s/ Herbert Beigel
Herbert Beigel, Esq. (Arizona Bar No. 21423)
Admitted pro hac vice
Law Offices of Herbert Beigel
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Tucson, AZ 85750
Office: (520) 825-1995
Mobile: (520) 869-5836
eFax: (520)-844-6215
hbeigel@me.com

CERTIFICATE OF SERVICE

I HEREBY certify that a true and correct copy of the foregoing was filed and served this 26th day of May, 2023 through the Court's CM/ECF on all counsel of record.

/s/ Jason R. Domark
Jason R. Domark

Exhibit A

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Jason Domark
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6302337
Invoice Date: 1/18/2023
Balance Due: $1,374.55

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) | **Proceeding Type: Depositions**

Job #: 5618026 | Job Date: 1/16/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Jason Domark
Scheduling Atty: Jason Domark | Cozen O'Connor PC

Witness: Anthony Janicki , Ph.D.	Quantity	Price	Amount
Original with 1 Certified Transcript	76.00	$4.55	$345.80
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	1.00	$70.00	$70.00
Exhibits	178.00	$0.35	$62.30
Exhibits - Color	107.00	$0.35	$37.45
Exhibit Share	1.00	$415.00	$415.00
Rough Draft	76.00	$2.25	$171.00
Litigation Package-Secure File Suite	1.00	$35.00	$35.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Veritext Virtual Set-up	1.00	$0.00	$0.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

Notes:

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6302337
Invoice Date: 1/18/2023
Balance Due: $1,374.55

53654

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Jason Domark
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6310028
Invoice Date: 1/23/2023
Balance Due: $1,072.00

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) — **Proceeding Type: Depositions**

Job #: 5618026 | Job Date: 1/16/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Jason Domark
Scheduling Atty: Jason Domark | Cozen O'Connor PC

Witness: Anthony Janicki , Ph.D.	Quantity	Price	Amount
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	1.00	$150.00	$150.00
Video - Exhibits - Linked (LEF, PTZ, XMEF, SBF)	1.00	$158.00	$158.00
Video - Media and Cloud Services	2.00	$28.00	$56.00
Video - Electronic Access	1.00	$88.00	$88.00
Video - Digitizing & Transcript Synchronization	2.00	$135.00	$270.00

Notes: Sync w XMEF to Cozen O' Connor- jdomark@cozen.com; jphelan@cozen.com

Invoice Total:	**$1,072.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,072.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6310028**
Invoice Date: **1/23/2023**
Balance Due: **$1,072.00**

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Jason Domark
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #:	**6311613**
Invoice Date:	**1/24/2023**
Balance Due:	**$0.00**

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) — **Proceeding Type: Depositions**

Job #: 5618039 | Job Date: 1/19/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Jason Domark
Scheduling Atty: Jason Domark | Cozen O'Connor PC

Witness: Steven Peene, PhD	Quantity	Price	Amount
Transcript Services - Original Transcript(s)	78.00	$4.55	$354.90
Rough Draft	78.00	$2.25	$175.50
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	1.00	$70.00	$70.00
Exhibits	198.00	$0.35	$69.30
Exhibits - Color	92.00	$0.35	$32.20
Exhibit Share	1.00	$415.00	$415.00
Veritext Exhibit Package (ACE)	1.00	$55.00	$55.00
Litigation Package - Secure File Suite	1.00	$35.00	$35.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Veritext Virtual Set-up	1.00	$0.00	$0.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

Notes:

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6311613
Invoice Date: 1/24/2023
Balance Due: $0.00

53654

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Invoice Total:	**$1,444.90**
Payment:	**($1,444.90)**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$0.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6311613**
Invoice Date: **1/24/2023**
Balance Due: **$0.00**

53654

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6331056
Invoice Date: 1/31/2023
Balance Due: $1,282.40

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB)
Proceeding Type: Depositions

Job #: 5682834 | Job Date: 1/26/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Brian Pailes , PhD., P.E.	Quantity	Price	Amount
Transcript Services - Certified Transcript	151.00	$3.75	$566.25
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	3.00	$70.00	$210.00
Exhibits	139.00	$0.35	$48.65
Exhibits - Color	370.00	$0.35	$129.50
Veritext Exhibit Package (ACE)	1.00	$55.00	$55.00
Litigation Package-Secure File Suite	1.00	$35.00	$35.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Veritext Virtual Set-up	1.00	$0.00	$0.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

Notes:

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6331056
Invoice Date: 1/31/2023
Balance Due: $1,282.40

53654

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT
LEGAL SOLUTIONS

	Invoice Total:	**$1,282.40**
	Payment:	**$0.00**
	Credit:	**$0.00**
	Interest:	**$0.00**
	Balance Due:	**$1,282.40**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

---

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6331056
Invoice Date: 1/31/2023
Balance Due: $1,282.40

53654

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #:	**6364700**
Invoice Date:	**2/16/2023**
Balance Due:	**$1,550.00**

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) — **Proceeding Type: Depositions**

Job #: 5682834 | Job Date: 1/26/2023 | Delivery: Normal

Location: Miami, FL

Billing Atty: Ashley L Gomez-Rodon

Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Brian Pailes , PhD., P.E.	Quantity	Price	Amount
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	3.00	$150.00	$450.00
Video - Exhibits - Linked (LEF, PTZ, XMEF, SBF)	1.00	$158.00	$158.00
Video - Media and Cloud Services	3.00	$34.00	$102.00
Video - Electronic Access	1.00	$85.00	$85.00
Video - Digitizing & Transcript Synchronization	3.00	$135.00	$405.00

Notes: Sync w/XMEF to Cozen O'Connor- agomez-rodon@cozen.com; jphelan@cozen.com

Invoice Total:	**$1,550.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,550.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6364700
Invoice Date: 2/16/2023
Balance Due: $1,550.00

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6391166
Invoice Date: 2/28/2023
Balance Due: $1,906.55

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) — **Proceeding Type: Depositions**

Job #: 5701217 | Job Date: 2/8/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Harvey Harper III , Ph.D., P.E.	Quantity	Price	Amount
Original with 1 Certified Transcript	97.00	$4.55	$441.35
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	2.00	$70.00	$140.00
Exhibits	1229.00	$0.40	$491.60
Exhibits - Color	149.00	$0.40	$59.60
Exhibit Share	1.00	$415.00	$415.00
Veritext Exhibit Package (ACE)	1.00	$51.00	$51.00
Litigation Package-Secure File Suite	1.00	$35.00	$35.00
Logistics & Processing	1.00	$35.00	$35.00
Veritext Virtual Set-up	1.00	$0.00	$0.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

Notes:

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6391166
Invoice Date: 2/28/2023
Balance Due: $1,906.55

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT
LEGAL SOLUTIONS

Invoice Total:	**$1,906.55**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,906.55**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6391166
Invoice Date: 2/28/2023
Balance Due: $1,906.55

53654

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6384644
Invoice Date: 2/23/2023
Balance Due: $1,400.00

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB)
Proceeding Type: Depositions

Job #: 5701217 | Job Date: 2/8/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Harvey Harper III , Ph.D., P.E.	Quantity	Price	Amount
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	2.00	$150.00	$300.00
Video - Exhibits - Linked (LEF, PTZ, XMEF, SBF)	1.00	$158.00	$158.00
Video - Media and Cloud Services	3.00	$34.00	$102.00
Video - Electronic Access	1.00	$85.00	$85.00
Video - Digitizing & Transcript Synchronization	3.00	$135.00	$405.00

Notes: Sync w/XMEF to Cozen; agomez-rodon@cozen.com

Invoice Total:	**$1,400.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,400.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6384644
Invoice Date: 2/23/2023
Balance Due: $1,400.00

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6377828
Invoice Date: 2/21/2023
Balance Due: $1,578.60

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC et al (312021CA000281MB) — **Proceeding Type: Depositions**

Job #: 5682788 | Job Date: 2/7/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Jeff Chrisco	**Quantity**	**Price**	**Amount**
Transcript Services - Certified Transcript	57.00	$3.75	$213.75
Exhibits	5.00	$0.40	$2.00
Litigation Package-Secure File Suite	1.00	$35.00	$35.00
Witness: Lawrence Vickers	**Quantity**	**Price**	**Amount**
Transcript Services - Certified Transcript	71.00	$3.75	$266.25
Exhibits	19.00	$0.40	$7.60
Litigation Package-Secure File Suite	1.00	$35.00	$35.00
	Quantity	**Price**	**Amount**
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	4.00	$70.00	$280.00
Exhibit Share	1.00	$415.00	$415.00
Veritext Exhibit Package (ACE)	1.00	$51.00	$51.00
Logistics & Processing	1.00	$35.00	$35.00
Veritext Virtual Set-up	1.00	$0.00	$0.00

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6377828
Invoice Date: 2/21/2023
Balance Due: $1,578.60

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

Notes:

Invoice Total:	**$1,578.60**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,578.60**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6377828**
Invoice Date: **2/21/2023**
Balance Due: **$1,578.60**

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6380877
Invoice Date: 2/22/2023
Balance Due: $1,858.00

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC et al (312021CA000281MB) | **Proceeding Type: Depositions**

Job #: 5682788 | Job Date: 2/7/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Jeff Chrisco	**Quantity**	**Price**	**Amount**
Video - Exhibits - Linked (LEF, PTZ, XMEF, SBF)	1.00	$158.00	$158.00
Video - Media and Cloud Services	1.00	$34.00	$34.00
Video - Digitizing & Transcript Synchronization	1.00	$135.00	$135.00

Witness: Lawrence Vickers	**Quantity**	**Price**	**Amount**
Video - Exhibits - Linked (LEF, PTZ, XMEF, SBF)	1.00	$158.00	$158.00
Video - Media and Cloud Services	2.00	$34.00	$68.00
Video - Digitizing & Transcript Synchronization	2.00	$135.00	$270.00

	Quantity	**Price**	**Amount**
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	4.00	$150.00	$600.00
Video - Electronic Access	1.00	$85.00	$85.00

Notes:

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6380877
Invoice Date: 2/22/2023
Balance Due: $1,858.00

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Invoice Total:	**$1,858.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,858.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6380877**
Invoice Date: **2/22/2023**
Balance Due: **$1,858.00**

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #:	**6472827**
Invoice Date:	**4/3/2023**
Balance Due:	**$1,436.00**

Case: Grand Harbor Community Association, Inc. v. GH Vero Beach Development LLC Et Al (312021CA000281MB) **Proceeding Type: Depositions**

Job #: 5773688 | Job Date: 3/13/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: John H. Stewart , P.E.	**Quantity**	**Price**	**Amount**
Transcript Services - Original Transcript(s)	67.00	$4.95	$331.65
Transcript - Supplemental Surcharges*	67.00	$0.40	$26.80
Witness Read and Sign Services	1.00	$25.00	$25.00
Litigation Package - Secure File Suite	1.00	$53.00	$53.00

Witness: Ray Franks , CGC	**Quantity**	**Price**	**Amount**
Transcript Services - Original Transcript(s)	53.00	$4.95	$262.35
Transcript - Supplemental Surcharges*	53.00	$0.40	$21.20
Witness Read and Sign Services	1.00	$25.00	$25.00
Litigation Package - Secure File Suite	1.00	$53.00	$53.00

	Quantity	**Price**	**Amount**
Attendance - First Hour	1.00	$120.00	$120.00
Attendance - Add'l Hours	4.00	$85.00	$340.00
Logistics & Processing	1.00	$35.00	$35.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Hosting & Delivery of Encrypted Files	1.00	$38.00	$38.00

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6472827
Invoice Date: 4/3/2023
Balance Due: $1,436.00

53654

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Notes: *Supplemental Surcharges Include: Video Proceeding		
	Invoice Total:	**$1,436.00**
	Payment:	**$0.00**
	Credit:	**$0.00**
	Interest:	**$0.00**
	Balance Due:	**$1,436.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6472827
Invoice Date: 4/3/2023
Balance Due: $1,436.00

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6442408
Invoice Date: 3/22/2023
Balance Due: $1,052.00

Case: Grand Harbor Community Association, Inc. v. GH Vero Beach Development LLC et al (312021CA000281MB) | **Proceeding Type: Depositions**

Job #: 5773688 | Job Date: 3/13/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

	Quantity	Price	Amount
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	4.00	$150.00	$600.00
Witness: Ray Franks , CGC	**Quantity**	**Price**	**Amount**
Video - Media and Cloud Services	1.00	$34.00	$34.00
Witness: John H. Stewart , P.E.	**Quantity**	**Price**	**Amount**
Video - Media and Cloud Services	2.00	$34.00	$68.00

Notes:

Invoice Total:	**$1,052.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,052.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6442408
Invoice Date: 3/22/2023
Balance Due: $1,052.00

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #:	**6441499**
Invoice Date:	**3/20/2023**
Balance Due:	**$1,254.10**

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) **Proceeding Type: Depositions**

Job #: 5796185 | Job Date: 3/6/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Francis J. Nardozza	Quantity	Price	Amount
Transcript Services - Original Transcript(s)	82.00	$4.55	$373.10
Transcript - Supplemental Surcharges*	82.00	$0.40	$32.80
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	1.00	$70.00	$70.00
Exhibits	138.00	$0.40	$55.20
Exhibit Share	1.00	$415.00	$415.00
Litigation Package - Secure File Suite	1.00	$35.00	$35.00
Logistics & Processing	1.00	$35.00	$35.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Veritext Virtual Set-up	1.00	$0.00	$0.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

Notes:

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6441499
Invoice Date: 3/20/2023
Balance Due: $1,254.10

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

*Supplemental Surcharges Include: Video Proceeding	**Invoice Total:**	**$1,254.10**
	Payment:	**$0.00**
	Credit:	**$0.00**
	Interest:	**$0.00**
	Balance Due:	**$1,254.10**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6441499**
Invoice Date: **3/20/2023**
Balance Due: **$1,254.10**

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6455919
Invoice Date: 3/27/2023
Balance Due: $1,081.00

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) — **Proceeding Type: Depositions**

Job #: 5796185 | Job Date: 3/6/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Francis J. Nardozza	Quantity	Price	Amount
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	1.00	$150.00	$150.00
Video - Exhibits - Linked (LEF, PTZ, XMEF, SBF)	1.00	$158.00	$158.00
Video - Media and Cloud Services	2.00	$34.00	$68.00
Video - Electronic Access	1.00	$85.00	$85.00
Video - Digitizing & Transcript Synchronization	2.00	$135.00	$270.00

Notes:

Invoice Total:	**$1,081.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,081.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6455919
Invoice Date: 3/27/2023
Balance Due: $1,081.00

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #:	**6433099**
Invoice Date:	**3/16/2023**
Balance Due:	**$2,413.80**

Case: Grand Harbor Community Association, Inc. v. GH Vero Beach Development LLC Et Al (312021CA000281MB) **Proceeding Type: Depositions**

Job #: 5773709 | Job Date: 3/1/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Lance Hall	Quantity	Price	Amount
Transcript Services - Original Transcript(s)	104.00	$4.55	$473.20
Transcript - Supplemental Surcharges*	104.00	$0.40	$41.60
Exhibits	690.00	$0.35	$241.50
Veritext Exhibit Package (ACE)	1.00	$51.00	$51.00
Litigation Package - Secure File Suite	1.00	$35.00	$35.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

	Quantity	Price	Amount
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	4.50	$70.00	$315.00
Exhibit Share	1.00	$415.00	$415.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00

Witness: Jeff Caso	Quantity	Price	Amount
Transcript Services - Original Transcript(s)	107.00	$4.55	$486.85
Transcript - Supplemental Surcharges*	107.00	$0.40	$42.80
Exhibits	11.00	$0.35	$3.85

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6433099
Invoice Date: 3/16/2023
Balance Due: $2,413.80

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Litigation Package - Secure File Suite	1.00	$35.00	$35.00
Logistics & Processing	1.00	$35.00	$35.00

Notes: *Supplemental Surcharges Include: Video Proceeding

Invoice Total:	**$2,413.80**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$2,413.80**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6433099
Invoice Date: 3/16/2023
Balance Due: $2,413.80

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #:	**6415409**
Invoice Date:	**3/9/2023**
Balance Due:	**$1,168.00**

Case: Grand Harbor Community Association, Inc. v. GH Vero Beach Development LLC et al (312021CA000281MB) **Proceeding Type: Depositions**

Job #: 5773709 | Job Date: 3/1/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Jeff Caso	**Quantity**	**Price**	**Amount**
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	5.00	$150.00	$750.00
Video - Media and Cloud Services	2.00	$34.00	$68.00

Notes: No Media Ordered

Invoice Total:	**$1,168.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,168.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6415409**
Invoice Date: **3/9/2023**
Balance Due: **$1,168.00**

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #:	**6506567**
Invoice Date:	**4/17/2023**
Balance Due:	**$1,392.00**

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC et al (312021CA000281MB) | **Proceeding Type: Depositions**

Job #: 5833817 | Job Date: 3/22/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

	Quantity	Price	Amount
Video - Initial Services	1.00	$350.00	$350.00
Video - Additional Hours	3.00	$150.00	$450.00
Video - Electronic Access	1.00	$85.00	$85.00
Witness: J. Rock Tonkel	**Quantity**	**Price**	**Amount**
Video - Media and Cloud Services	2.00	$34.00	$68.00
Video - Digitizing & Transcript Synchronization	2.00	$135.00	$270.00
Witness: Lance Hall	**Quantity**	**Price**	**Amount**
Video - Media and Cloud Services	1.00	$34.00	$34.00
Video - Digitizing & Transcript Synchronization	1.00	$135.00	$135.00

Notes:

Invoice Total:	**$1,392.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,392.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6506567
Invoice Date: 4/17/2023
Balance Due: $1,392.00

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6475920
Invoice Date: 4/4/2023
Balance Due: $1,380.95

Case: Grand Harbor Community Association, INC v. GH Vero Beach Development LLC Et Al (312021CA000281MB) | **Proceeding Type: Depositions**

Job #: 5833817 | Job Date: 3/22/2023 | Delivery: Normal

Location: Miami, FL
Billing Atty: Ashley L Gomez-Rodon
Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

	Quantity	Price	Amount
Attendance - First Hour	1.00	$110.00	$110.00
Attendance - Add'l Hours	3.00	$70.00	$210.00
Veritext Virtual Primary Participants	1.00	$105.00	$105.00
Witness: J. Rock Tonkel	**Quantity**	**Price**	**Amount**
Transcript Services - Original Transcript(s)	94.00	$4.55	$427.70
Transcript - Supplemental Surcharges*	94.00	$0.40	$37.60
Exhibits	2.00	$0.40	$0.80
Witness Read and Sign Services	1.00	$25.00	$25.00
Litigation Package - Secure File Suite	1.00	$35.00	$35.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00
Witness: Lance Hall	**Quantity**	**Price**	**Amount**
Transcript Services - Original Transcript(s)	63.00	$4.55	$286.65
Transcript - Supplemental Surcharges*	63.00	$0.40	$25.20
Witness Read and Sign Services	1.00	$25.00	$25.00
Litigation Package - Secure File Suite	1.00	$35.00	$35.00

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6475920
Invoice Date: 4/4/2023
Balance Due: $1,380.95

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Logistics & Processing	1.00	$35.00	$35.00

Notes: *Supplemental Surcharges Include: Video Proceeding

Invoice Total:	**$1,380.95**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,380.95**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6475920
Invoice Date: 4/4/2023
Balance Due: $1,380.95

53654

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Herbert Beigel Esq
Herbert Beigel & Associates LLC
5641 North Chieftan Trail
Tucson, AZ, 85750

Invoice #:	**6441160**
Invoice Date:	**3/21/2023**
Balance Due:	**$399.04**

Case: Grand Harbor Community Association, Inc. v. GH Vero Beach Development, LLC Et Al (312021CA000281) **Proceeding Type: Depositions**

Job #: 5700988 | Job Date: 3/7/2023 | Delivery: Normal

Location: Orlando, FL

Billing Atty: Herbert Beigel Esq

Scheduling Atty: Lewis W. Murphy | Murphy & Walker

Witness: Christopher Cleary	**Amount**
Transcript Services	$296.25
Logistics, Processing & Electronics Files	$91.00

Notes:

Invoice Total:	**$387.25**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$11.79**
Balance Due:	**$399.04**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

THIS INVOICE IS 65 DAYS PAST DUE, PLEASE REMIT - THANK YOU

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted]**ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6441160**
Invoice Date: **3/21/2023**
Balance Due: **$399.04**

40278

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Herbert Beigel Esq
Herbert Beigel & Associates LLC
5641 North Chieftan Trail
Tucson, AZ, 85750

Invoice #:	**6366068**
Invoice Date:	**2/16/2023**
Balance Due:	**$1,322.45**

Case: Grand Harbor Community Association, Inc. v. GH Vero Beach Development LLC, Et Al. (312021CA000281) — **Proceeding Type: Depositions**

Job #: 5635674 | Job Date: 2/13/2023 | Delivery: Normal

Location: Fort Lauderdale, FL

Billing Atty: Herbert Beigel Esq

Scheduling Atty: Edward da le Parte | de la Parte Gilbert McNamara & Caldevilla P.A.

Witness: Michael Antinelli	**Amount**
Transcript Services	$639.10
Rough Draft	$346.50
Exhibits	$187.25
Logistics, Processing & Electronics Files	$91.00

Notes:

Invoice Total:	**$1,263.85**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$58.60**
Balance Due:	**$1,322.45**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

THIS INVOICE IS 98 DAYS PAST DUE, PLEASE REMIT - THANK YOU

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted]**ABA:**[redacted]
Swift:[redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6366068
Invoice Date: 2/16/2023
Balance Due: $1,322.45

40278

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Herbert Beigel Esq
Herbert Beigel & Associates LLC
5641 North Chieftan Trail
Tucson, AZ, 85750

Invoice #:	**6399942**
Invoice Date:	**3/2/2023**
Balance Due:	**$465.51**

Case: Grand Harbor Community Association, Inc. v. GH Vero Beach Development, LLC Et Al (312021CA000281) — **Proceeding Type: Depositions**

Job #: 5700964 | Job Date: 2/14/2023 | Delivery: Normal

Location: Orlando, FL

Billing Atty: Herbert Beigel Esq

Scheduling Atty: Lewis W. Murphy | Murphy & Walker

Witness: Danica Bahadur	**Amount**
Transcript Services	$363.75
Logistics, Processing & Electronics Files	$88.00

Notes:

Invoice Total:	**$451.75**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$13.76**
Balance Due:	**$465.51**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

THIS INVOICE IS 84 DAYS PAST DUE, PLEASE REMIT - THANK YOU

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted]**ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6399942**
Invoice Date: **3/2/2023**
Balance Due: **$465.51**

40278

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Invoice Total:	**$1,374.55**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,374.55**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
Bank Addr: 311 W. Monroe Chicago, IL 60606
Account No: [redacted] **ABA:** [redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: **6302337**
Invoice Date: **1/18/2023**
Balance Due: **$1,374.55**

53654

Exhibit B

John C. Kurtz, CPA, CGMA

12620 85th St.
Fellsmere, FL 32948

Invoice

Via Email hbeigel@me.com
Herbert Beigel, Esq. 3/31/2023
Herbert Beigel & Associates
38327 S. Arroyo Way
Tucson, AZ 85739

Grand Harbor Community Association, Inc. vs.
GH Vero Beach Development LLC et al
Professional services provided subject to Agreement dated December 14, 2022
Case No. 31-2021-CA-000281

Date	Description of services rendered	Hours
Mar		
6	Read Frank Nardozza expert report dated March 2, 2023	1.5
20	Phone call with Ashley Gomez-Rodon, Esq. re: deposition and records to review	0.5
24	Review of records provided by Ashley for review	5.0
27	Phone call with Ashley Gomez-Rodon, Esq. and Herb Beigel, Esq. re: deposition prep	1.0
29	Final prep for deposition; review Summary Judgment granted for Defendant today	1.2

Total hours for the billing period	9.2
Rate	400.00
Total professional fees due	**$ 3,680.00**

Due upon receipt. Late after 45 days.

Invoice: **1517**

From: 12/01/2022
To: 01/31/2023
Issued: 02/06/2023
Due By: 03/08/2023

BRIZAGA
ASSESS. COMMUNICATE. ADAPT.

TO:
GHVB c/o Herbert Beigel & Associates
Herbert Beigel
5641 N Chieftan Trail
Tuscon, AZ 85750

FROM:
Brizaga, Inc.
Alec Bogdanoff
2101 W Commercial Blvd, Ste 4600
Fort Lauderdale, FL 33309
United States
PH: (954) 834-3533

Phase	Quantity	Rate	Total
222038.00-01-Task 1 - Expert Witness			
Expert Witness (General)	11.83	$300.00	$3,549.00
Subtotal Fees	**11.83**		**$3,549.00**
Total for 222038.00-01-Task 1 - Expert Witness			**$3,549.00**
	Subtotal		**$3,549.00**
	Total		**$3,549.00**

WE'VE MOVED!! Please update your records. If you have any questions about your bill, please contact us at accounting@brizaga.com, or by phone at (954) 834-3533.

Invoice: **1536**

From: 02/01/2023
To: 02/28/2023
Issued: 03/12/2023
Due By: 04/11/2023

BRIZAGA
ASSESS. COMMUNICATE. ADAPT.

TO:
GHVB c/o Herbert Beigel & Associates
Herbert Beigel
5641 N Chieftan Trail
Tuscon, AZ 85750

FROM:
Brizaga, Inc.
Alec Bogdanoff
2101 W Commercial Blvd, Ste 4600
Fort Lauderdale, FL 33309
United States
PH: (954) 834-3533

Phase		Quantity	Rate	Total
222038.00-01-Task 1 - Expert Witness				
Expert Witness (Deposition)		5.50	$400.00	$2,200.00
Expert Witness (General)		3.58	$300.00	$1,074.00
	Subtotal Fees	**9.08**		**$3,274.00**
Total for 222038.00-01-Task 1 - Expert Witness				**$3,274.00**
		Subtotal		**$3,274.00**
		Total		**$3,274.00**

WE'VE MOVED!! Please update your records. If you have any questions about your bill, please contact us at accounting@brizaga.com, or by phone at (954) 834-3533.

DESIMONE

December 30, 2022
Project No: 0220743.00
Invoice No: 68828

Herbert Beigel
Herbert Beigel & Associates
5641 N Cheiftan Trail
Tuscon, AZ 85750

Invoice Total	$17,920.00

Project 0220743.00 Grand Harbor v. GH Vero Beach Development

Professional Services for the period ending: December 31, 2022

Phase 01 Expert Witness Services

		Hours	Rate	Amount
PRINCIPAL /SME				
Bonanno, James	12/19/2022	.50	450.00	225.00
Review reports				
Bonanno, James	12/20/2022	.50	450.00	225.00
Review reports				
Bonanno, James	12/21/2022	.50	450.00	225.00
Call with counsel				
DIRECTOR				
Castellano, Joseph	7/12/2022	.50	380.00	190.00
initial phone call with client/DCE				
Castellano, Joseph	7/25/2022	.50	380.00	190.00
call with client				
Castellano, Joseph	8/24/2022	.50	380.00	190.00
call with client				
Castellano, Joseph	11/30/2022	1.00	380.00	380.00
call with client				
Castellano, Joseph	12/9/2022	1.00	380.00	380.00
call with client				
Castellano, Joseph	12/15/2022	1.00	380.00	380.00
call with client/counsel				
Castellano, Joseph	12/16/2022	1.00	380.00	380.00
follow up call with client				
ASSOCIATE DIRECTOR				
Domingo, Rachel	7/12/2022	2.10	315.00	661.50
Review latest Grand Harbor docs (e.g. complaint); call with Herb & Simon				
Domingo, Rachel	7/19/2022	1.50	315.00	472.50
Review and inventory previous documents received; share with internal team				

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number
Swift Code

Domingo, Rachel	7/25/2022	1.00	315.00	315.00	
pre-call and SOW development					
Domingo, Rachel	8/1/2022	1.00	315.00	315.00	
retention letter template for Joe					
Domingo, Rachel	8/24/2022	2.00	315.00	630.00	
Call with clients to finalize scope and retention letter. Follow up on last dates of previous work product. Locate and circulate final report from condition assessment.					
Domingo, Rachel	11/30/2022	1.40	315.00	441.00	
Call w Herb re: report strategy and scope; internal work planning					
Domingo, Rachel	12/9/2022	1.30	315.00	409.50	
Call with client; review statement of opinions					
Domingo, Rachel	12/14/2022	.50	315.00	157.50	
Internal inquiries for expert					
Domingo, Rachel	12/15/2022	1.00	315.00	315.00	
Call with client; expert summary					
Domingo, Rachel	12/16/2022	2.30	315.00	724.50	
Call with client; expert summary; internal inquiries for experts					
Domingo, Rachel	12/19/2022	.60	315.00	189.00	
Confirm internal expert					
Domingo, Rachel	12/20/2022	2.30	315.00	724.50	
Jim B intro call with Herb + Cozen; gather relevant docs for Jim and distrubute					
PROJECT ENGINEER					
Mosavi, Hossein	12/9/2022	5.00	190.00	950.00	
Reviewing/Analyzing reports					
Mosavi, Hossein	12/12/2022	7.00	190.00	1,330.00	
Analyzing technical reports/Research on vertical clearance					
Mosavi, Hossein	12/13/2022	7.00	190.00	1,330.00	
Analyzing technical reports/Research on corrosion					
Mosavi, Hossein	12/14/2022	7.00	190.00	1,330.00	
Analyzing technical reports/Reveiwing FDOT Code					
Mosavi, Hossein	12/15/2022	7.00	190.00	1,330.00	
Analyzing technical reports/Research on exposure categories					
Mosavi, Hossein	12/16/2022	7.00	190.00	1,330.00	
Analyzing technical reports/Reviewing Codes and standards					
Mosavi, Hossein	12/21/2022	4.00	190.00	760.00	
Reviewing/Analyzing reports & Code review					
Mosavi, Hossein	12/27/2022	7.00	190.00	1,330.00	
Analyzing technical reports/Reviewing Codes and standards					
PROJECT ASSISTANT / NON-TECH SUPPORT					
Martinez, Jennifer	7/11/2022	1.00	110.00	110.00	
Preliminary conflict search, enter Opportunity					
Totals		76.00		17,920.00	
Total Labor					**17,920.00**

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number
Swift Code

Total this Phase	**$17,920.00**
Total This Invoice	**$17,920.00**

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Nu[redacted]
Account Number [redacted]
Swift Code [redacted]

DESIMONE

January 31, 2023
Project No: 0220743.00
Invoice No: 69039

Herbert Beigel
Herbert Beigel & Associates
5641 N Cheiftan Trail
Tuscon, AZ 85750

Invoice Total $49,762.50

Project 0220743.00 Grand Harbor v. GH Vero Beach Development

Professional Services for the period ending: January 31, 2023

Phase 01 Expert Witness Services

		Hours	Rate	Amount
PRINCIPALS SME				
Bonanno, James	1/3/2023	1.00	460.00	460.00
Document Review				
Bonanno, James	1/4/2023	2.00	460.00	920.00
Document Review				
Bonanno, James	1/5/2023	1.00	460.00	460.00
Team strategy call				
Bonanno, James	1/9/2023	1.00	460.00	460.00
Review project documents				
Bonanno, James	1/10/2023	1.00	460.00	460.00
Review project documents				
Bonanno, James	1/11/2023	1.00	460.00	460.00
Meeting with counsel				
Bonanno, James	1/12/2023	2.00	460.00	920.00
Document review and in house discussions				
Bonanno, James	1/13/2023	1.00	460.00	460.00
Review Documents				
Bonanno, James	1/17/2023	1.00	460.00	460.00
Document review				
Bonanno, James	1/18/2023	1.00	460.00	460.00
Review Documents				
Bonanno, James	1/19/2023	1.00	460.00	460.00
Team discusssion				
Bonanno, James	1/24/2023	1.00	460.00	460.00
Prep for Pailes Deposition				
Bonanno, James	1/25/2023	1.00	460.00	460.00
Prep for Pailes Deposition				
Bonanno, James	1/26/2023	2.00	460.00	920.00
Pailes Deposition				

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number [redacted]
Swift Code [redacted]

Bonanno, James	1/31/2023	1.00	460.00	460.00
Review Reports				
DIRECTOR				
Castellano, Joseph	1/4/2023	2.00	380.00	760.00
reports review				
Castellano, Joseph	1/5/2023	1.00	380.00	380.00
project timeline/internal discussions				
Castellano, Joseph	1/6/2023	1.00	380.00	380.00
call with client				
Castellano, Joseph	1/11/2023	2.00	380.00	760.00
call with client re depo prep; internal doscussions				
Castellano, Joseph	1/12/2023	1.50	380.00	570.00
review KH report/discussion/review VCS reports				
Castellano, Joseph	1/20/2023	1.00	380.00	380.00
review other issues/reports/discussion with client				
Castellano, Joseph	1/23/2023	2.00	380.00	760.00
report/doc review to support litigation/expert				
Castellano, Joseph	1/24/2023	1.00	380.00	380.00
review docs/call wtih counsel/internal follow up doscussions				
Castellano, Joseph	1/25/2023	2.00	380.00	760.00
internal calls/call with counsel re depo				
ASSOCIATE DIRECTOR				
Domingo, Rachel	1/3/2023	2.50	315.00	787.50
Prepare timeline of events and high level org chart for Jim				
Domingo, Rachel	1/4/2023	1.50	315.00	472.50
Review reports				
Domingo, Rachel	1/5/2023	2.00	315.00	630.00
Call with Jim and Hossein to go over timeline and previous reports/documents				
Domingo, Rachel	1/6/2023	1.50	315.00	472.50
prep Expert call with Cozen/Jim Bonnano				
Domingo, Rachel	1/9/2023	1.00	315.00	315.00
Call with Jim Bonanno to recap Friday call with Cozen/Herb				
Domingo, Rachel	1/10/2023	2.60	315.00	819.00
VCS report review + internal discussion				
Domingo, Rachel	1/11/2023	2.30	315.00	724.50
Pailes Q's and prep with Cozen/Herb				
Domingo, Rachel	1/12/2023	1.50	315.00	472.50
Review Kimley Horn Report with Jim B. / Hossain				
Domingo, Rachel	1/18/2023	2.00	315.00	630.00
Download, distribute and preliminary review of marina "club" files				
Domingo, Rachel	1/20/2023	3.50	315.00	1,102.50
Set up H5/Relativity; review Pailes production				

Domingo, Rachel	1/23/2023	3.50	315.00	1,102.50
Outreach for experts for seawall, retaining wall and decking; Review Relativity Pailes production & Jan 2022 VCS report provided				
Domingo, Rachel	1/24/2023	3.70	315.00	1,165.50
Review Relativity Pailes production Call with Herb				
Domingo, Rachel	1/25/2023	4.60	315.00	1,449.00
Interal meeting to prep for Pailes; Review Relativity Pailes production; Pailes prep call with Herb & Cozen;				
Domingo, Rachel	1/26/2023	4.00	315.00	1,260.00
Pailes depo				
Domingo, Rachel	1/30/2023	2.50	315.00	787.50
Internal debrief, further research on maintainance/preservation				
SENIOR PROJECT ENGINEERS				
Fackler, Aaron	1/4/2023	3.10	320.00	992.00
Document review and databasing.				
Hansen, Andrew	1/25/2023	.50	320.00	160.00
Short discussion with Rachel regarding Rebar Corrosion and Galvanostatic Pulse Testing				
PROJECT ENGINEERS				
Mosavi, Hossein	1/5/2023	2.00	195.00	390.00
Research/Group meeting about the corrosion on Bridge 2				
Mosavi, Hossein	1/6/2023	3.00	195.00	585.00
Research/Reviewing corrosion report by VCS				
Mosavi, Hossein	1/9/2023	8.00	195.00	1,560.00
Research/Reviewing corrosion report by VCS				
Mosavi, Hossein	1/10/2023	8.00	195.00	1,560.00
Research/Reviewing corrosion report by VCS & Kimley Horn report				
Mosavi, Hossein	1/11/2023	8.00	195.00	1,560.00
Research/Reviewing corrosion report by VCS & FDOT Guidelines				
Mosavi, Hossein	1/12/2023	8.00	195.00	1,560.00
Research/Reviewing corrosion report by VCS & Letter for Vertical Clearance				
Mosavi, Hossein	1/13/2023	8.00	195.00	1,560.00
Research/Reviewing reports by FDOT & Atlas Engineering				
Mosavi, Hossein	1/17/2023	8.00	195.00	1,560.00
Reviewing FDOT Guidelines/Cover depth requirements				
Mosavi, Hossein	1/18/2023	8.00	195.00	1,560.00
Research/Reviewing corrosion report by VCS				
Mosavi, Hossein	1/19/2023	8.00	195.00	1,560.00
Research/Reviewing corrosion reports and reviewing related files				
Mosavi, Hossein	1/20/2023	8.00	195.00	1,560.00
Research/Reviewing AASHTO 1992				

Mosavi, Hossein	1/23/2023	4.00	195.00	780.00	
Research on corrosion					
Mosavi, Hossein	1/24/2023	4.00	195.00	780.00	
Research/Reviewing corrosion report by VCS					
Mosavi, Hossein	1/25/2023	8.00	195.00	1,560.00	
Reviewing Code for exposure category					
Mosavi, Hossein	1/26/2023	7.00	195.00	1,365.00	
Attending deposition/ Research on corrosion					
Mosavi, Hossein	1/27/2023	7.00	195.00	1,365.00	
Research on discussed items on deposition/ Study of Cost analysis on corrosion					
Mosavi, Hossein	1/30/2023	8.00	195.00	1,560.00	
Research on discussed items on deposition/ Study of Cost analysis on corrosion					
Mosavi, Hossein	1/31/2023	3.00	195.00	585.00	
Research on discussed items on deposition/ Reviewing stuctural codes in 1993					
Totals		191.80		49,762.50	
Total Labor					**49,762.50**

Total this Phase	**$49,762.50**
Total This Invoice	**$49,762.50**

Outstanding Invoices

Number	**Date**	**Balance**
68828	12/30/2022	17,920.00
Total		**17,920.00**

Total Now Due **$67,682.50**

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number
Swift Code

DESIMONE

March 6, 2023
Project No: 0220743.00
Invoice No: 69627

Herbert Beigel
Herbert Beigel & Associates
5641 N Cheiftan Trail
Tuscon, AZ 85750

Invoice Total $28,945.00

Project 0220743.00 Grand Harbor v. GH Vero Beach Development

Professional Services for the period ending: February 28, 2023

Phase 01 Expert Witness Services

		Hours	Rate	Amount
PRINCIPALS SME				
Bonanno, James	2/3/2023	2.00	460.00	920.00
Review bridge repair methods				
Bonanno, James	2/13/2023	.50	460.00	230.00
Review project documents				
Bonanno, James	2/14/2023	.50	460.00	230.00
Review project documents				
Bonanno, James	2/15/2023	1.00	460.00	460.00
Review project documents				
Bonanno, James	2/16/2023	1.00	460.00	460.00
Internal call to discuss Pailes deposition and next steps				
Bonanno, James	2/17/2023	1.00	460.00	460.00
Teams meeting with client to discuss next steps				
Bonanno, James	2/20/2023	.50	460.00	230.00
Rebuttal Report Outline				
Bonanno, James	2/21/2023	.50	460.00	230.00
Prepare report outline				
Bonanno, James	2/22/2023	1.00	460.00	460.00
Internal report outline review				
Bonanno, James	2/23/2023	1.00	460.00	460.00
Review report outline				
Bonanno, James	2/24/2023	1.00	460.00	460.00
Conferene call with client				
Bonanno, James	2/27/2023	1.00	460.00	460.00
Review reports, prepare expert text				
Bonanno, James	2/28/2023	1.00	460.00	460.00
Review documents				

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number [redacted]
Swift Code [redacted]

DIRECTOR				
Castellano, Joseph	2/17/2023	1.00	380.00	380.00
call with legal/DCE teams				
Castellano, Joseph	2/22/2023	1.00	380.00	380.00
meeting to review outline with counsel				
Castellano, Joseph	2/24/2023	1.50	380.00	570.00
meet with counsel to review DCE outline				
ASSOCIATE DIRECTOR				
Domingo, Rachel	2/1/2023	1.10	315.00	346.50
Download, review and distribute Pailes transcript; follow up with client & team				
Domingo, Rachel	2/16/2023	1.30	315.00	409.50
Interal regroup - JB, HM, JC				
Domingo, Rachel	2/17/2023	2.10	315.00	661.50
research on maintenance tasks				
Domingo, Rachel	2/20/2023	2.20	315.00	693.00
preparation of outline maintenance research / gather standards & guides for expert				
Domingo, Rachel	2/22/2023	3.80	315.00	1,197.00
preparation of outline maintenance research / gather standards & guides for expert review Servos report rec'd from Herb				
Domingo, Rachel	2/24/2023	3.00	315.00	945.00
internal working session on outline Brige 1 photo search call with Cozen/Herb to review outline				
PROJECT ENGINEERS				
Mosavi, Hossein	2/1/2023	6.00	195.00	1,170.00
Revewing Deposition Transcript/ Reserach on the claims on the transcript				
Mosavi, Hossein	2/2/2023	8.00	195.00	1,560.00
Revewing Deposition Transcript/ Reserach on the claims on the transcript				
Mosavi, Hossein	2/6/2023	2.00	195.00	390.00
Revewing Deposition Transcript/ Reserach on the claims on the transcript				
Mosavi, Hossein	2/8/2023	8.00	195.00	1,560.00
Revewing Deposition Transcript/ Reserach on the claims on the transcript				
Mosavi, Hossein	2/13/2023	4.00	195.00	780.00
Revewing Deposition Transcript/ Reserach on the claims on the transcript				
Mosavi, Hossein	2/14/2023	7.00	195.00	1,365.00
Revewing Deposition Transcript/ Reserach on the claims on the transcript				
Mosavi, Hossein	2/15/2023	6.00	195.00	1,170.00
Revewing Deposition Transcript/ Reserach on the claims on the transcript				

Mosavi, Hossein	2/16/2023	4.00	195.00	780.00
Reseach on sealants/meeting with group to discuss the report issues				
Mosavi, Hossein	2/17/2023	8.00	195.00	1,560.00
Meeting with Client/Preparing report outline for Bridge 2				
Mosavi, Hossein	2/20/2023	8.00	195.00	1,560.00
Preparing outline for report				
Mosavi, Hossein	2/21/2023	4.00	195.00	780.00
Preparing outline for report				
Mosavi, Hossein	2/22/2023	4.50	195.00	877.50
Preparing outline for report				
Mosavi, Hossein	2/23/2023	8.00	195.00	1,560.00
Preparing outline for report				
Mosavi, Hossein	2/24/2023	4.50	195.00	877.50
Meeting with client/ Review the outlies for report				
Mosavi, Hossein	2/27/2023	6.00	195.00	1,170.00
Preparing Report				
Mosavi, Hossein	2/28/2023	3.50	195.00	682.50
Preparing Report				
Totals		120.50		28,945.00

Total Labor **28,945.00**

Total this Phase **$28,945.00**

Total This Invoice **$28,945.00**

Outstanding Invoices

Number	Date	Balance
68828	12/30/2022	17,920.00
69039	1/31/2023	49,762.50
Total		**67,682.50**

Total Now Due **$96,627.50**

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number [redacted]
Swift Code [redacted]

DESIMONE

April 13, 2023
Project No: 0220743.00
Invoice No: 70619

Herbert Beigel
Herbert Beigel & Associates
5641 N Cheiftan Trail
Tuscon, AZ 85750

Invoice Total	**$56,940.50**

Project 0220743.00 Grand Harbor v. GH Vero Beach Development

Professional Services for the period ending: March 31, 2023

Phase 01 Expert Witness Services

		Hours	Rate	Amount
PRINCIPALS SME				
Bonanno, James	3/2/2023	1.00	460.00	460.00
Review technical report				
Bonanno, James	3/16/2023	2.00	460.00	920.00
Review report				
Bonanno, James	3/17/2023	2.00	460.00	920.00
Review report				
Bonanno, James	3/20/2023	1.00	460.00	460.00
Prepare Report				
Bonanno, James	3/21/2023	1.00	460.00	460.00
Prepare Report				
Bonanno, James	3/22/2023	2.00	460.00	920.00
Prepare Report				
Bonanno, James	3/23/2023	2.00	460.00	920.00
Prepare Report				
Bonanno, James	3/24/2023	6.00	460.00	2,760.00
Prepare Report				
Bonanno, James	3/27/2023	10.00	460.00	4,600.00
Prepare Report, call with counsel				
Bonanno, James	3/28/2023	6.00	460.00	2,760.00
Review Report				
Bonanno, James	3/29/2023	6.00	460.00	2,760.00
Review Report				
DIRECTOR				
Castellano, Joseph	3/22/2023	3.50	380.00	1,330.00
review of report				
Castellano, Joseph	3/24/2023	4.00	380.00	1,520.00
review report				

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number [redacted]
Swift Code [redacted]

Castellano, Joseph	3/27/2023	2.00	380.00	760.00
report review; call with counsel				
ASSOCIATE DIRECTOR				
Domingo, Rachel	3/2/2023	1.10	315.00	346.50
report check-in, project management				
Domingo, Rachel	3/9/2023	1.50	315.00	472.50
Project management / report check-in				
Domingo, Rachel	3/16/2023	1.10	315.00	346.50
Report review				
Domingo, Rachel	3/17/2023	2.10	315.00	661.50
Report review; project management/coordination				
Domingo, Rachel	3/20/2023	.50	315.00	157.50
Report review; project management/coordination				
Domingo, Rachel	3/21/2023	1.00	315.00	315.00
Review/QA service life calculations				
Domingo, Rachel	3/22/2023	2.80	315.00	882.00
Report				
Domingo, Rachel	3/23/2023	5.00	315.00	1,575.00
Call with Herb/Cozen; internal working session to review report				
Domingo, Rachel	3/24/2023	4.00	315.00	1,260.00
Report				
Domingo, Rachel	3/27/2023	8.20	315.00	2,583.00
Working session in office, finalize report				
Domingo, Rachel	3/28/2023	3.80	315.00	1,197.00
Report review and depo prep				
SENIOR PROJECT ENGINEERS				
Fackler, Aaron	3/27/2023	3.20	320.00	1,024.00
Researching 'run to failure' concept. Reviewing report.				
PROJECT ENGINEERS				
Mosavi, Hossein	3/2/2023	1.00	195.00	195.00
Prepared report				
Mosavi, Hossein	3/3/2023	6.50	195.00	1,267.50
Prepared report for Bridge 2				
Mosavi, Hossein	3/6/2023	6.00	195.00	1,170.00
Preparing report for Bridge 2				
Mosavi, Hossein	3/7/2023	4.00	195.00	780.00
Preparing report for Bridge 2				
Mosavi, Hossein	3/8/2023	3.50	195.00	682.50
Preparing report for Bridge 2				
Mosavi, Hossein	3/9/2023	3.70	195.00	721.50
Preparing report for Bridge 2				
Mosavi, Hossein	3/13/2023	7.30	195.00	1,423.50
Preparing report				
Mosavi, Hossein	3/14/2023	8.00	195.00	1,560.00
Preparing report				

Mosavi, Hossein	3/15/2023	4.00	195.00	780.00	
Preparing report					
Mosavi, Hossein	3/16/2023	8.00	195.00	1,560.00	
Preparing report					
Mosavi, Hossein	3/17/2023	4.00	195.00	780.00	
Preparing report					
Mosavi, Hossein	3/20/2023	8.00	195.00	1,560.00	
Preparing report					
Mosavi, Hossein	3/21/2023	7.00	195.00	1,365.00	
Preparing report					
Mosavi, Hossein	3/22/2023	8.00	195.00	1,560.00	
Preparing report					
Mosavi, Hossein	3/23/2023	7.50	195.00	1,462.50	
Preparing report					
Mosavi, Hossein	3/24/2023	4.50	195.00	877.50	
Preparing report					
Mosavi, Hossein	3/25/2023	5.00	195.00	975.00	
Preparing report					
Mosavi, Hossein	3/26/2023	8.00	195.00	1,560.00	
Preparing report					
Mosavi, Hossein	3/27/2023	8.00	195.00	1,560.00	
Preparing report					
Mosavi, Hossein	3/28/2023	8.00	195.00	1,560.00	
Preparing report					
Mosavi, Hossein	3/29/2023	6.00	195.00	1,170.00	
Preparing report					
Totals		208.80		56,940.50	
Total Labor					**56,940.50**

Total this Phase **$56,940.50**

Total This Invoice **$56,940.50**

Outstanding Invoices

Number	**Date**	**Balance**
69039	1/31/2023	49,762.50
69627	3/6/2023	28,945.00
Total		**78,707.50**

Total Now Due **$135,648.00**

Remit checks to / Lockbox Information:

DeSimone Consulting Engineering DPC
P.O. Box 69258
Baltimore, MD 21264-9258

Wire / ACH Instructions:

ABA Routing Number [redacted]
Account Number
Swift Code

RIMKUS

12140 Wickchester Lane, Suite 300
Houston, TX 77079
(713) 621-3550

Cozen O'Connor
200 South Biscayne Boulevard, Suite 3000
Miami, FL 33131
Contact: Ashley Gomez-Rodon

Invoice Number:	6848513
Invoice Date:	April 18, 2023
Invoice Due:	Upon Receipt
Rimkus File Number:	100200585

Re: Grand Harbor Community Association, Inc/GH Vero Beach Development, LLC Depositions
Date of Loss: 12/07/2020

For Professional Services Rendered

Current Billing

Total Fees	$	771.00
Amount Due	$	771.00
Amount Due in USD	**$**	**771.00**

Please Remit to:

Mail To:
Rimkus Consulting Group, Inc.
P.O. Box 676741
Dallas, TX 75267-6741

Federal ID: 76-0163936

Banking Details:
Routing ABA No: [redacted] (Wires Only)
Routing (ABA) No: [redacted] (ACH Only)
Swift Code: [redacted]
Account Number: [redacted]

Time Detail

Date	Name	Description	Hours	Rate	Amount
03/13/23	John H. Stewart	Provide testimony at deposition.	1.20	380.00	456.00
03/13/23	Raymond L. Franks	Deposition via video.	0.90	350.00	315.00
		Total	**2.10**		**$771.00**

Timekeeper Summary

Name	Timekeeper Title		Hours	Amount
John H. Stewart	Principal Consultant		1.20	456.00
Raymond L. Franks	Senior Consultant		0.90	315.00
		Total	**2.10**	**$771.00**

Exhibit C

Veritext, LLC - Florida Region

Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Ashley L Gomez-Rodon
Cozen O'Connor PC
200 S Biscayne Blvd, Suite 3000
Miami, FL, 33131

Invoice #: 6408357
Invoice Date: 3/7/2023
Balance Due: $1,277.50

Case: Grand Harbor Community Association, INC. v. GH Vero Beach Development LLC Et Al (312021CA000281MB) — **Proceeding Type: Hearing**

Job #: 5760931 | Job Date: 3/2/2023 | Delivery: Expedited

Location: Vero Beach, FL

Billing Atty: Ashley L Gomez-Rodon

Scheduling Atty: Ashley L Gomez-Rodon | Cozen O'Connor PC

Witness: Judge J. Croom	Quantity	Price	Amount
Transcript Services - Hearing	77.00	$13.50	$1,039.50
Attendance - Hearing	1.00	$145.00	$145.00
Litigation Package - Secure File Suite	1.00	$35.00	$35.00
Logistics & Processing	1.00	$35.00	$35.00
Hosting & Delivery of Encrypted Files	1.00	$23.00	$23.00

Notes:

Invoice Total:	**$1,277.50**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,277.50**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

THIS INVOICE IS 59 DAYS PAST DUE, PLEASE REMIT - THANK YOU

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Bank Addr:311 W. Monroe Chicago, IL 60606
Account No:[redacted] **ABA:**[redacted]
Swift: [redacted]

Pay by Credit Card: www.veritext.com

Invoice #: 6408357
Invoice Date: 3/7/2023
Balance Due: $1,277.50

Exhibit D

INVOICE

LaSorte Mediation
results through experience

Alfred A. LaSorte, Jr., P.A. d/b/a LaSorte Mediation
290 N Olive Ave, #308
West Palm Beach, FL 33401

Al@LaSorteMediation.com
(561) 286-7994
LaSorteMediation.com

Herbert Biegel, Esq.

Bill to
Herbert Biegel, Esq.
5641 N. Chieftan Trail
Tucson, AZ 85750

Invoice details
Invoice no.: 1403
Invoice date: 03/09/2023
Due date: 04/08/2023

	Product or service		Amount
1.	**Hours** 03.08.23 - Grand Harbor Community Assn. v GH Vero Beach Development, LLC Zoom Mediation - review materials submitted by counsel in preparation for mediation (0.7); attend mediation (2.5)	3.2 hrs × $250.00	$800.00

Total **$800.00**

Overdue 04/08/2023

Note to customer

Rate charged is one half Mr. LaSorte's mediator rate of $500/hr, as the parties have agreed to equally share payment responsibility.
Thank you for your business.

Exhibit E

LIGHTHOUSE

Invoice

51 University St #400 | Seattle, WA 98101
206.233.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Invoice Number: INV000801974

Invoice Date: 1/31/2022

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 1/1/2022 - 1/31/2022

LH Internal Ref:

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Hosting				
Data Hosting (GB)	0.20	Unit	$12.00	$2.40
Hosting Project Management (Hours)	0.17	Unit	$185.00	$31.45
Subtotal				$33.85
Sales Tax				$0.14
Invoice Total				$33.99

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
2000 Clayton Rd Bldg D
Concord, CA 94520-2400
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

Lighthouse eDiscovery does not accept responsibility for third party billing.
Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Invoice

Invoice Number: INV000818532

Invoice Date: 7/31/2022

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 7/1/2022 - 7/31/2022

LH Internal Ref: 7667NS

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	62.50	GB	$39.00	$2,437.50
Data Processing Export Fees (GB)	61.40	GB	$175.00	$10,745.00
Hosting				
Data Hosting (GB)	69.70	GB	$12.00	$836.40
Hosting Project Management (Hours)	7.85	Hr	$185.00	$1,452.25
User Fees (Users)	1.00	User	$89.00	$89.00
Subtotal				$15,560.15
Sales Tax				$56.45
Invoice Total				$15,616.60

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000821436

Invoice Date: 8/31/2022

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 8/1/2022 - 8/31/2022

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	54.80	GB	$39.00	$2,137.20
Data Processing Export Fees (GB)	50.20	GB	$175.00	$8,785.00
Hosting				
Data Hosting (GB)	170.00	GB	$12.00	$2,040.00
Hosting Project Management (Hours)	9.91	Hr	$185.00	$1,833.35
User Fees (Users)	2.00	User	$89.00	$178.00
Subtotal				$14,973.55
Sales Tax				$135.30
Invoice Total				$15,108.85

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Invoice Number: INV000824530

Invoice Date: 9/30/2022

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 9/1/2022 - 9/30/2022

LH Internal Ref: 7667NS

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	503.90	GB	$39.00	$19,652.10
Data Processing Export Fees (GB)	248.00	GB	$175.00	$43,400.00
Hosting				
Data Hosting (GB)	290.30	GB	$12.00	$3,483.60
Hosting Project Management (Hours)	47.34	Hr	$185.00	$8,757.90
User Fees (Users)	2.00	User	$89.00	$178.00
Subtotal				$75,471.60
Sales Tax				$223.36
Invoice Total				$75,694.96

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

Lighthouse eDiscovery does not accept responsibility for third party billing.
Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000826937

Invoice Date: 10/31/2022

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 10/1/2022 - 10/31/2022

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	45.60	GB	$39.00	$1,778.40
Data Processing Export Fees (GB)	39.40	GB	$175.00	$6,895.00
Hosting				
Data Hosting (GB)	406.50	GB	$12.00	$4,878.00
Hosting Project Management (Hours)	79.95	Hr	$185.00	$14,790.75
User Fees (Users)	2.00	User	$89.00	$178.00
Production				
Imaging and Endorsement (GB)	40.00	GB	$295.00	$11,800.00
Subtotal				$40,320.15
Sales Tax				$308.42
Invoice Total				$40,628.57

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000829836

Invoice Date: 11/30/2022

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 11/1/2022 - 11/30/2022

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	89.60	GB	$39.00	$3,494.40
Data Processing Export Fees (GB)	43.30	GB	$175.00	$7,577.50
Hosting				
Data Hosting (GB)	579.20	GB	$12.00	$6,950.40
Hosting Project Management (Hours)	32.00	Hr	$185.00	$5,920.00
User Fees (Users)	4.40	User	$89.00	$391.60
Production				
Imaging and Endorsement (GB)	26.60	GB	$295.00	$7,847.00
Subtotal				$32,180.90
Sales Tax				$447.86
Invoice Total				$32,628.76

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000832746

Invoice Date: 12/31/2022

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 12/1/2022 - 12/31/2022

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	3.40	GB	$39.00	$132.60
Data Processing Export Fees (GB)	1.80	GB	$175.00	$315.00
Hosting				
Data Hosting (GB)	582.60	GB	$12.00	$6,991.20
Hosting Project Management (Hours)	35.02	Hr	$185.00	$6,478.70
User Fees (Users)	7.40	User	$89.00	$658.60
Subtotal				$14,576.10
Sales Tax				$466.64
Invoice Total				$15,042.74

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS.
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

LIGHTHOUSE

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Invoice

Invoice Number: INV000835280

Invoice Date: 1/31/2023

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 1/1/2023 - 1/31/2023

LH Internal Ref: 7667NS

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	27.00	GB	$39.00	$1,053.00
Data Processing Export Fees (GB)	22.20	GB	$175.00	$3,885.00
Hosting				
Data Hosting (GB)	668.70	GB	$12.00	$8,024.40
Hosting Project Management (Hours)	72.24	Hr	$185.00	$13,364.40
User Fees (Users)	15.40	User	$89.00	$1,370.60
Production				
Imaging and Endorsement (GB)	1.80	GB	$295.00	$531.00
Subtotal				$28,228.40
Sales Tax				$526.12
Invoice Total				$28,754.52

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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LIGHTHOUSE

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Invoice

Invoice Number: INV000838439

Invoice Date: 2/28/2023

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 2/1/2023 - 2/28/2023

LH Internal Ref: 7667NS

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	1.90	GB	$39.00	$74.10
Data Processing Export Fees (GB)	1.70	GB	$175.00	$297.50
Hosting				
Data Hosting (GB)	641.60	GB	$12.00	$7,699.20
Hosting Project Management (Hours)	17.00	Hr	$185.00	$3,145.00
User Fees (Users)	16.40	User	$89.00	$1,459.60
Subtotal				$12,675.40
Sales Tax				$512.90
Invoice Total				$13,188.30

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000841448

Invoice Date: 3/31/2023

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 3/1/2023 - 3/31/2023

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Import Fees (GB)	1.40	GB	$39.00	$54.60
Data Processing Export Fees (GB)	0.10	GB	$175.00	$17.50
Hosting				
Data Hosting (GB)	482.40	GB	$12.00	$5,788.80
Hosting Project Management (Hours)	11.83	Hr	$185.00	$2,188.55
User Fees (Users)	5.20	User	$89.00	$462.80
Production				
Imaging and Endorsement (GB)	0.10	GB	$295.00	$29.50
Subtotal				$8,541.75
Sales Tax				$350.09
Invoice Total				$8,891.84

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000844285

Invoice Date: 4/30/2023

Billing Contact:

Terms: Net 60 days

Client PO Number:

Service Date: 4/1/2023 - 4/30/2023

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Hosting				
Data Hosting (GB)	482.40	GB	$12.00	$5,788.80
Hosting Project Management (Hours)	10.19	Hr	$185.00	$1,885.15
User Fees (Users)	5.25	User	$89.00	$467.25
Subtotal				$8,141.20
Sales Tax				$350.34
Invoice Total				$8,491.54

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000844394

Invoice Date: 4/30/2023

Billing Contact:

Terms: Net 60 days

Client PO Number:

Service Date: 4/1/2023 - 4/30/2023

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Club Matter

Invoice Item	Quantity	Unit	Rate	Amount
Hosting				
Data Hosting (GB)	160.50	GB	$12.00	$1,926.00
User Fees (Users)	13.25	User	$89.00	$1,179.25
Subtotal				$3,105.25
Sales Tax				$173.90
Invoice Total				$3,279.15

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
[redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

LIGHTHOUSE

Invoice

Invoice Number: INV000841734

Invoice Date: 3/31/2023

Billing Contact:

Terms: Net 30 days

Client PO Number:

Service Date: 3/1/2023 - 3/31/2023

LH Internal Ref: 7667NS

51 University St #400 | Seattle, WA 98101
206.223.9690 | www.lighthouseglobal.com
FEIN: 43-1676776

Bill To Address:
Icahn Enterprises, L.P.
5641 N Chieftan Trl
Tucson, AZ 85750-1302
USA

Matter Name: Grand Harbor Association Matter

Invoice Item	Quantity	Unit	Rate	Amount
Processing				
Data Processing Export Fees (GB)	1.20	GB	$175.00	$210.00
Hosting				
Data Hosting (GB)	160.50	GB	$12.00	$1,926.00
Hosting Project Management (Hours)	0.67	Hr	$185.00	$123.95
User Fees (Users)	13.20	User	$89.00	$1,174.80
Subtotal				$3,434.75
Sales Tax				$173.65
Invoice Total				$3,608.40

Remittance Information
Email Remittance Info: **accountsreceivable@lighthouseglobal.com**

ACH PAYMENTS:
Bank Of America
401 Union Street, FL 23

Seattle, WA 98101
Account Name: Lighthouse Document Technologies, Inc.
Account Type: Deposit Account
Account #: [redacted] ABA Routing [redacted]
Swift Code: [redacted]

CHECK REMITTANCE:
Lighthouse Document Technologies
Lighthouse Document Technologies Inc.
PO Box 7410525
Chicago, IL 60674-0525

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Past due accounts will be charged interest at the rate of 1.5% per month.
Lighthouse eDiscovery is a registered trade name of Lighthouse Document Technologies, Inc

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR INDIAN RIVER COUNTY, FLORIDA

GRAND HARBOR COMMUNITY ASSOCIATION, INC.,

Plaintiff,

vs.

Case No. 31-2021-CA-000281

GH VERO BEACH DEVELOPMENT LLC, a Delaware limited liability company; **CHRISTOPHER J. CLEARY, JOSEPH COLASUONNO, CHRIS CARD; MICHAEL GOSTOMSKI,** and **DANICA BAHADUR,**

Defendants.

_______________________________________/

Assigned to the Honorable Janet Carney Croom

PLAINTIFF'S MOTION FOR STAY PENDING APPEAL

Pursuant to Florida Rule of Appellate Procedure 9.310(a), the Plaintiff/Appellant, Grand Harbor Community Association, Inc., moves to stay further proceedings in this case pending the outcome of Plaintiff's pending appeal, and states:

1. On March 29, 2023, this Court issued its Order on Defendant's Motion for Partial Summary Judgment.

2. On April 13, 2023, the Plaintiff filed a motion for rehearing, and on April 25, 2023, that motion was denied.

3. On May 8, 2023, the trial court issued its Final Judgment.

4. On May 12, 2023, the Plaintiff filed its notice of appeal. The appeal is designated as Fla. 4th DCA Case No. 4D23-1191.

5. On May 26, 2023, Defendant GH Vero Beach Development, LLC filed its "Motion to Tax Costs Against Plaintiff," which seeks a costs award of $326,039.66. Instead of waiting for the appellate court to decide the pending appeal, Defendant has scheduled its motion for a hearing to be conducted on August 31, 2023.

6. Pursuant to Florida Rule of Appellate Procedure 9.310(a), "a party seeking to stay a final or non-final order pending review shall file a motion in the lower tribunal, which shall have continuing jurisdiction, in its discretion, to grant, modify, or deny such relief."

7. The purpose of a stay is to maintain the status quo in the lower tribunal while an appeal proceeds. *QBE Ins. Corp. v. Chalfonte Condominium Apartment Ass'n, Inc.*, 94 So.3d 541, 555 (Fla. 2012).

8. In this case, the most prudent course of action would be to stay Defendant's motion tax costs pending the outcome of Plaintiff's pending appeal. Doing so will avoid unnecessary piece meal proceedings, conserve judicial resources, and avoid unnecessary legal expenses. If the Plaintiff is the prevailing party in its appeal and the final judgment is reversed, such a stay will avoid the need to vacate, reconsider or modify any previously awarded costs, and/or avoid the need to have separate additional hearings for the purpose of awarding additional costs at the conclusion of the litigation on remand. Moreover, regardless of which party prevails in the pending appeal, that appeal may result in an award of appellate costs that this Court will also have to decide by a separate hearing. Instead of piece meal hearings and potentially awarding taxable costs to the wrong party, this Court can conduct a single hearing to determine and award taxable costs at the conclusion of the entire litigation. *See, e.g., Specialty Restaurants Corp. v. Elliott*, 924 So. 2d 834, 836 (Fla. 2d DCA 2005) (trial court agreed to stay hearing on motion for attorney's fees and costs pending the outcome of pending appeal). *See also, Pinto v. Rambosk,* 2:19-CV-551-JLB-MRM, 2021 WL 4263404, *2 (M.D. Fla. Sept. 20, 2021) (courts routinely defer ruling on motions for attorney's fees and costs pending appeal in the interest of judicial economy); *Merrill Lynch Credit Corp. v. Lenz,* 09-60633-CV, 2011 WL 13400643, *2 (S.D. Fla. Aug. 31, 2011), *report and recommendation adopted,* 09-60633-CIV, 2011 WL 13400642 (S.D. Fla. Nov. 16, 2011) ("issues relating to fees and costs are better addressed after the conclusion of the appeal" and "holding

these matters in abeyance will avoid the premature expenditure of scarce judicial resources, as well as extensive briefing, argument, and expense by the parties"); *Hetrick v. Ideal Image Dev. Corp.*, 807-CV-871-T-33TBM, 2009 WL 413533, *2 (M.D. Fla. Feb. 18, 2009) (granting stay of appellee's request for attorney's fees and costs pending the resolution of appellant's appeal); *Specialized Transp. of Tampa Bay, Inc. v. Nestles Waters N. Am., Inc.*, No. 06-CV-421, 2009 WL 1788373, *1 (M.D. Fla. June 22, 2009)(denying without prejudice motion for attorney's fees and costs during pendency of appeal in order to avoid piecemeal litigation); *Nat'l Farmers' Org., Inc. v. Associated Milk Producers, Inc.*, 850 F.2d 1286, 1312 (8th Cir. 1988), *cert. den.*, 489 U.S. 1081 (1989) ("rather than undertaking the time-consuming task of determining a reasonable attorney's fee, only to see the effort overturned on appeal,...the district court wisely deferred ruling on attorney's fees and costs pending appeal").

9. This motion will not result in any prejudice to anyone, and will instead, promote judicial economy and efficiency, and will reduce both parties' overall litigation expenses.

WHEREFORE, the Plaintiff requests this Honorable Court to stay further proceedings in this case pending the outcome of Plaintiff's appeal in Fla. 4th DCA Case No. 4D23-1191.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy hereof has been electronically filed with the Clerk of the Court, and electronically served upon Ashley Gomez-Rodon, Esquire, Jason Domark, Esquire, and Matthew Criscuolo, Esquire, Cozen O'Connor, Southeast Financial Center, 200 S. Biscayne Boulevard, Suite 3000, Miami, FL 33131, (Email: agomez-rodon@cozen.com; jdomark@cozen.com; mcriscuolo@cozen.com; jphelan@cozen.com); and Herbert Beigel, Esq., Law Offices of Herbert Beigel, 5641 N. Chieftan Trail, Tucson, AZ 85750, (Email: hbeigel@me.com); on this 19th day of JULY, 2023.

Respectfully submitted,

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COUNSEL FOR PLAINTIFF

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT
IN AND FOR INDIAN RIVER COUNTY, FLORIDA
Case No.: 312021CA000281
Assigned to Judge Janet Carney Croom

GRAND HARBOR COMMUNITY ASSOCIATION, INC.,

Plaintiff,

v.

GH VERO BEACH DEVELOPMENT LLC, a Delaware LLC;
CHRISTOPHER J. CLEARY, JOSEPH COLASUONNO, CHRIS CARD,
MICHAEL GOSTOMSKI; and DANICA BAHADUR,

Defendants.
____/

NOTICE OF VIDEO/WEBCAST HEARING

NOTICE IS HEREBY GIVEN that the above captioned matter shall go before the Court on the following matter(s):

DATE:	Wednesday, August 16, 2023
TIME:	8:30 a.m. (UMC)
JUDGE:	Honorable Janet Carney Croom
PLACE*:	Remote Attendance via Zoom

MATTER(s) TO BE HEARD:

PLAINTIFF'S MOTION FOR STAY PENDING APPEAL

PLEASE GOVERN YOURSELVES ACCORDINGLY.

https://zoom.us/j/7450461040?pwd=Rk5GY05VZFBnVnA3d0phM2krVHpQQT09

Phone: (646) 558-8656
Meeting ID: 745 046 1040
Passcode: 123456

Dated this 20th day of July, 2023.

MURPHY & WALKER, P.L.
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By: ______________________
Lewis W. Murphy, Jr.
Florida Bar No. 0909467
Casey Walker
Florida Bar No. 0099848
Elisa C. Mills
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And

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed electronically and served by email using the Florida Courts' E-Filing System to: **Jason R. Domark, Esq., Matthew**

B. Criscuolo, Esq., Ashley Gomez-Rodon, Esq., Cozen O'Connor, Southeast Financial Center, Suite 3000, 200 South Biscayne Blvd, Miami, FL 33131, jdomark@cozen.com, mcriscuolo@cozen.com, agomez-rodon@cozen.com, jphelan@cozen.com, sberkheimer@cozen.com, *Co-Counsel for Defendants*; and **Herbert Beigel, Esq.**, Law Offices of Herbert Beigel, 5641 N. Chieftan Trail, Tucson, AZ 85750, hbeigel@me.com, *Pro Hac Vice Co-Counsel for Defendants* this 20th day of July, 2023.

Casey Walker
Florida Bar No. 099848

IN THE CIRCUIT COURT OF THE 19TH JUDICIAL CIRCUIT IN AND FOR INDIAN RIVER COUNTY, FLORIDA

CIVIL DIVISION

CASE NO. 312021CA000281MB

GRAND HARBOR COMMUNITY ASSOCIATION, INC.,

Plaintiff,

vs.

GH VERO BEACH DEVELOPMENT, LLC, a Delaware LLC, CHRISTOPHER J. CLEARY, JOSEPH COLASUONNO, CHRIS CARD, MICHAEL GOSTOMSKI, and DANICA BAHADUR,

Defendants.

_______________________________________/

DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR STAY PENDING APPEAL

Defendants, GH VERO BEACH DEVELOPMENT, LLC ("GH Development") and CHRISTOPHER J. CLEARY, JOSEPH COLASUONNO, CHRIS CARD, MICHAEL GOSTOMSKI, and DANICA BAHADUR, file this Response to Plaintiff's Motion for Stay Pending Appeal, and state:

INTRODUCTION

After nearly two years of contentious litigation, involving the review and production of hundreds of thousands of documents, 15 lay and expert witness depositions, and substantial motion practice, this Court entered summary judgment for Defendants on all of Plaintiff's claims, which sought in excess of $25 million in damages related to the turnover of a community known as Grand Harbor. Defendants then timely filed their Motion to Tax Costs within 30 days of the Court's final judgment as expressly required by Fla. R. Civ. P. 1.525. The Motion to Tax seeks $326,039.66 in costs that Defendants were required to incur for depositions, expert witnesses, court reporting costs, mediation, and electronic discovery expenses.

After Defendants filed their Motion to Tax, Plaintiff appealed this Court's final summary judgment, and, based on the pending appeal, seek a stay. But Plaintiff has no automatic right to a stay—to the contrary, the Florida rules expressly contemplate a quick resolution of cost motions, including during an appeal. Plaintiff also has provided no good cause to deviate from the standard procedure, and, in contrast, Defendants would be prejudiced if they are not immediately reimbursed the substantial sums they were required to incur or advance.

Alternatively, if this Court were to grant a stay, Plaintiff should be required to post a bond in the full amount of Defendants' costs.

ARGUMENT

I. Plaintiff's Request for a Stay Should Be Denied as Plaintiff Has Failed to Set Forth Good Cause, Has Failed to Post a Bond, and a Stay Would Prejudice Defendants.

Plaintiff seeks a stay pending appeal on the sole basis that, if the appellate court reverses this Court's final summary judgment order, this Court may have to revisit the issue of costs. Plaintiff's argument, however, does not establish good cause for a stay. Indeed, in every appeal following entry of judgment for one side or the other, there is a risk (however small) that the appellate court may reverse and the trial court may have to revisit the issues. Yet a stay pending appeal is not an automatic right.

Rather, the Florida Rules on taxation of costs specifically contemplate a swift resolution of these issues. That is why Rule 1.525 requires that motions to tax costs be filed within 30 days of the final judgment—not 30 days of the resolution of any appeals. Indeed, Florida courts have specifically held that motions for costs are collateral issues that are <u>not</u> affected by the pendency of an appeal. *See Bernstein v. Berrin*, 516 So.2d 1042 (Fla. 2d DCA 1987) (holding that "the trial court does not lose jurisdiction to award any type of allowable attorney's fees upon filing of the notice of appeal from the final judgment"); *Finst Development, Inc. v. Bemaor*, 449 So.2d 290 (Fla. 3d DCA 1983) ("Since the act of taxing attorneys' fees and costs does not affect or interfere with the subject matter of the appeal, the trial court had jurisdiction to enter a judgment therefor"). No doubt the foregoing is why Plaintiff fails to cite <u>any</u> Florida state court decision holding that a motion to tax costs must be stayed pending appeal.

Plaintiff has not even attempted to set forth other good cause, such as prejudice that would befall Plaintiff from not obtaining a stay. In contrast, Defendants would be prejudiced as Defendants have had to incur and/or advance over $300,000 in costs to defend Plaintiff's meritless suit, and Defendants are entitled to immediate reimbursement of those amounts. Defendants are not required to "loan" that money to Plaintiff pending its appeal.

Finally, even if Plaintiff had set forth good cause, Plaintiff should be required to post a bond to obtain its requested stay. Rule 9.310 provides that "a stay pending review may be conditioned on the posting of a good and sufficient bond, other conditions, or both." And in *Finst*, the court held that a proceeding seeking attorneys' fees and costs should not be stayed without the posting of such a bond. *Finst Development*, 449 So.2d at 291-92 ("Finst shall be entitled to a further stay only if it chooses to post a good and sufficient supersedeas bond in accordance with [Rule] 9.310(b)(1)."). Thus, if Plaintiff is granted a stay, it should post a bond in the full amount of Defendants' costs.

CONCLUSION

Wherefore, Defendants request that this Court enter an Order DENYING Plaintiff's Motion to Strike and for a Stay, and granting such other relief as the Court deems just and proper. Alternatively, if the Court does grant a stay, Defendants request that the Association be ordered to post a bond in the amount of $326,039.66.

Date: August 8, 2023

Respectfully submitted,

/s/ Jason R. Domark
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/s/ Herbert Beigel
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CERTIFICATE OF SERVICE

I HEREBY certify that a true and correct copy of the foregoing was filed and served this 8th day of August, 2023 through the Court's CM/ECF on all counsel of record.

/s/ Jason R. Domark
Jason R. Domark

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT IN AND FOR INDIAN RIVER COUNTY, FLORIDA

GRAND HARBOR COMMUNITY ASSOCIATION, INC.,

Plaintiff,

vs. **Case No. 31-2021-CA-000281**

GH VERO BEACH DEVELOPMENT LLC, a Delaware limited liability company; **CHRISTOPHER J. CLEARY, JOSEPH COLASUONNO, CHRIS CARD; MICHAEL GOSTOMSKI,** and **DANICA BAHADUR,**

Assigned to the Honorable Janet Carney Croom

Defendants.

_______________________________________/

ORDER DENYING PLAINTIFF'S MOTION FOR STAY PENDING APPEAL

THIS CAUSE came before the Court on August 16, 2023, concerning Plaintiff's Motion for Stay Pending Appeal filed on July 19, 2023. The Court, having considered the motion, the Defendants' response in opposition, and the arguments of counsel, and being otherwise advised in the premises, it is hereby

ORDERED AND ADJUDGED as follows:

1. Plaintiff's July 19, 2023 Motion for Stay Pending Appeal is denied.

2. Counsel for the parties shall confer and attempt to reach agreement on an appropriate discovery schedule and to reschedule a new hearing date for Defendant's Motion to Tax Costs Against Plaintiff filed on May 26, 2023.

DONE AND ORDERED in chambers in Vero Beach, Indian River County, Florida, on this ______ day of _____________, 2023.

08/22/2023 12:17:40
2021 CA 000281

eSigned by JANET CARNEY CROOM (NOT) 08/22/2023 12:17:40

Honorable Janet Carney Croom

Conformed copies to:

Plaintiff's counsel: Edward P. de la Parte, Jr., Esquire, David M. Caldevilla, Esquire, Nicolas Q. Porter, Esquire, Lewis W. Murphy, Jr., Esquire, Casey Walker, Esquire, and Elisa C. Mills, Esquire

Defendants' counsel: Ashley Gomez-Rodon, Esquire, Jason Domark, Esquire, Matthew Criscuolo, Esquire, and Herbert Beigel, Esquire