UMBT General Fund
PO Box 520
387 Ye Olde Highway
Mt. Bethel, PA 18343

Sales Receipt

Date	Sale No.
7/23/2025	9424

Sold To
Jeff Williams

Check No.	Payment Method
Cash	

Description	Qty	Rate	Amount
Misc. Income copies		6.25	6.25

Gross McGinley
De-Duped.
there are TWO #1 invoices
dated 1 month apart

	Total	$6.25

GROSSMCGINLEY LLP
ATTORNEYS AT LAW

33 South Seventh Street
P. O. Box 4060
Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

TAX I.D. # 23-2007651

Statement Date: 09/01/2024
Account No: 33486.0004 *
Statement No: 1

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: DECLARATORY/INJUCTIVE RELIEF - AXA

			Rate	Hours	
06/05/2024	AKC	Attend Meeting with legal Team	160.00	1.00	160.00
06/11/2024	AKC	follow up communications with insurance carrier regarding substitution and depletion policy limits	160.00	0.20	32.00
06/12/2024	AKC	Attend weekly legal meeting	160.00	1.00	160.00
06/14/2024	AKC	Review chart from Metzger	160.00	0.20	32.00
	AKC	Review file transferred by Margolis	160.00	1.20	192.00
06/18/2024	AKC	Prepare substitution and provide to counsel	160.00	0.30	48.00
06/20/2024	AKC	Review response to RTK request	160.00	0.20	32.00
06/22/2024	AKC	Review discovery ideas from legal team	160.00	0.20	32.00
06/24/2024	AKC	Review and file appearance/substitution	160.00	0.20	32.00
06/30/2024	AKC	Review series of emails sent by township engineer	160.00	0.40	64.00
07/08/2024	JD	Review Complaint	160.00	0.20	32.00
	JD	Research statutes cited in Complaint	160.00	0.20	32.00
	JD	Review Upper Mount Bethel Township Meeting Agenda for March 4, 2024 in preparation to draft Motion for Leave to Amend Answer	160.00	0.20	32.00
	JD	Review answer filed by Margolis Edelstein	160.00	0.60	96.00
	JD	Review Complaint in C48-CV-2024-03571	160.00	1.00	160.00
	JD	Review case file in preparation to file motion to leave to amend answer	160.00	2.00	320.00
	JD	Prepare Motion for Leave to File Amended Answer	160.00	0.60	96.00

			Rate	Hours	
	JD	Prepare Brief in Support of Motion for Leave to Amend Answer	160.00	0.60	96.00
	JD	Prepare proposed order for Motion for Leave to Amend Answer	160.00	0.20	32.00
07/09/2024	AKC	Electronic communication with counsel for co-defendant Coyle re answer and other pleadings	160.00	0.20	32.00
	JD	Revise motion for leave to amend answer	160.00	0.20	32.00
07/10/2024	AKC	Attend meeting with clients, co-counsel and team on coordination of defense	160.00	1.00	160.00
	AKC	Review and communicate with client re status amended answer and strategy	160.00	0.20	32.00
	AKC	Prepare finalize and file pleading	160.00	0.20	32.00
	AKC	Prepare and serve on counsel motion and proposed amended pleading	160.00	0.20	32.00
	AKC	Electronic communication with counsel re service of motion to amend to add affirmative defenses	160.00	0.30	48.00
	JD	Electronic communication with Co Defendant's counsel, Glenn Kimble	160.00	0.20	32.00
	AKC	Prepare revised answer with affirmative defenses	160.00	1.40	224.00
	AKC	Review emails regarding formation of Municipal Authority	160.00	0.30	48.00
	AKC	Electronic communication with Kaplin inquiring if he opposes motion for leave	160.00	0.20	32.00
07/15/2024	AKC	Attend Motions Court to present motion for leave to amend answer	160.00	2.20	352.00
07/16/2024	AKC	Review transcript and recording of municipal authority meeting	160.00	1.00	160.00
07/17/2024	AKC	Attend meeting re discovery, pleadings and strategy	160.00	1.00	160.00
07/18/2024	AKC	Attend meeting and review follow up re: Declaratory Judgment action	160.00	0.70	112.00
07/24/2024	AKC	Review plaintiff reply to new matter of client and co-defendant	160.00	0.30	48.00
07/26/2024	AKC	Review discovery demands sent by Coyle to Plaintiffs	160.00	0.40	64.00
07/31/2024	AKC	Attend meeting with counsel	160.00	1.00	160.00
	AKC	Electronic communication with counsel regarding stipulation and discovery	160.00	0.20	32.00
08/01/2024	AKC	Review and communicate with Asteak re acceptance	160.00	0.20	32.00
08/02/2024	JD	Review Defendant Coyle's Request for Production of Documents propounded on Plaintiff	160.00	0.40	64.00
	JD	Review Defendant' Coyle's Interrogatories propounded on Plaintiff	160.00	0.60	96.00
	JD	Review correspondence from Attorney Asteak regarding preliminary objections and the scheduling of future depositons	160.00	0.20	32.00
08/06/2024	AKC	Review and respond to correspondence on outstanding discovery	160.00	0.20	32.00
08/12/2024	AKC	Review correspondence from counsel for COyle to RPL	160.00	0.20	32.00

UPPER MOUNT BETHEL TOWNSHIP

September 01, 2024
Account No.: 33486-0004*
Statement No: 1

RE: DECLARATORY/INJUCTIVE RELIEF - AXA

			Rate	Hours	
08/19/2024	JD	Interoffice conference to evaluate case in preparation of filing responses to the preliminary objections	160.00	0.40	64.00
	JD	review all pleadings in preparation of drafting preliminary objections	160.00	1.00	160.00
	JD	Review correspondence from opposing counsel re: motion to compel	160.00	0.20	32.00
	JD	Review Plaintiff Motion to Compel and proposed order	160.00	0.40	64.00
	AKC	Review communication from counsel re proposed motion	160.00	0.20	32.00
08/20/2024	JD	Review Defendant River Pointe's Preliminary Objections to our Complaint in preparation of response.	160.00	1.60	256.00
08/21/2024	JD	Revise response to preliminary objections for Atty Cousens review	160.00	1.40	224.00
	JD	Electronic communication from Attorney Gary Asteak Re: Deposition of John Bermingham	160.00	0.20	32.00
	AKC	Electronic communication with clients regarding POs status	160.00	0.30	48.00
	AKC	Attend meeting with client and co-counsel	160.00	1.00	160.00
	AKC	Review and respond on request for availability for deps on preliminary objections	160.00	0.20	32.00
	AKC	Research issue related to discovery on preliminary objections	160.00	0.30	48.00
08/22/2024	JD	Interoffice conference to evaluate case in preparation for 8/22 ZHB hearing	160.00	0.20	32.00
	JD	Attend Zoning Hearing Board meeting	160.00	5.00	800.00
08/23/2024	JD	Attend Motions court on RPL's motion to compel, motion to stay and order for joinder	160.00	2.00	320.00
	JD	Review & revise preliminary objections	160.00	0.60	96.00
08/26/2024	JD	Electronic communication from Rich Meltz regarding PO's and additional arguments and defenses to raise.	160.00	0.20	32.00
	JD	Revise preliminary objections	160.00	0.40	64.00
	JD	Electronic communication from Attorney Pickler	160.00	0.20	32.00
	JD	Review correspondence to opposing counsel re: preliminary objections	160.00	0.20	32.00
08/27/2024	JD	Review correspondence with Bd. Of supervisors regarding motion to stay and need for depositons	160.00	0.20	32.00
	JD	Electronic communication from Attorney Asteak re: September 25 hearing, motion to stay and depositions	160.00	0.20	32.00
	JD	Electronic communication from J. Bermingham about availability for a meeting tomorrow	160.00	0.20	32.00
	JD	Review correspondence from John Bermingham re: meeting, as well as correspondence re: strategy for depositon	160.00	0.20	32.00
	AKC	Review Coyle discovery responses	160.00	1.00	160.00
08/28/2024	JD	Attend weekly strategy meeting re: motion to stay, preliminary objections and litigation strategy	160.00	1.00	160.00
	AKC	Attend meeting to discuss competing cases and request for stay	160.00	0.50	80.00
08/29/2024	JD	Review Plaintiff's Request for production of documents	160.00	0.20	32.00
	JD	Review Plaintiffs request for Interrogatories	160.00	0.20	32.00
	JD	Review Justin Coyle's Responses and objections to Plaintiff's First Request for Production of documents	160.00	0.40	64.00

			Rate	Hours	
	JD	Interoffice conference to evaluate responses to discovery requests	160.00	0.40	64.00
	JD	Electronic communication with Attorney Pickler requesting an extension of discovery deadline	160.00	0.20	32.00
	JD	Electronic communication from Atty. Pickler	160.00	0.20	32.00
	JD	Prepare separate discovery responses for each supervisor to answer	160.00	0.20	32.00
08/30/2024	AKC	Attend meeting with J Bermingham regarding discovery responses	160.00	0.60	96.00
08/31/2024	AKC	Electronic communication with board and township with draft discovery responses and document requests	160.00	0.40	64.00
	AKC	Prepare discovery responses drafts	160.00	1.20	192.00
		FOR CURRENT SERVICES RENDERED		46.80	7,488.00

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
JULIANNE DANCHAK	24.80	$160.00	$3,968.00
ADRIAN K. COUSENS	22.00	160.00	3,520.00

TOTAL CURRENT WORK	7,488.00
BALANCE DUE	$7,488.00

This statement contains information that is confidential and subject to attorney/client privilege.

GROSS McGINLEY LLP
ATTORNEYS AT LAW

TAX I.D. # 23-2007651

33 South Seventh Street
P. O. Box 4060
Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

Statement Date: 10/01/2024
Account No: 33486.0003 *
Statement No: 1

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: DECLARATORY/INJUNCTIVE RELIEF

DUPLICATE

			Rate	Hours	
09/10/2024	MSG	Prepare Began preparing emails (x41) provided by client to be produced in discovery (converting to PDF files)	160.00	1.20	192.00
09/11/2024	MSG	Continued converting all J. Birmingham emails and attachments into a PDF and created a PDF file for production via discovery (41 email plus attachments)	160.00	2.60	416.00
	MSG	Converted all JC. Eckman emails and attachments into a PDF and created a PDF file for production via discovery	160.00	1.10	176.00
09/12/2024	MSG	Prepared additional JB email (set II) for document production	160.00	0.80	128.00
	MSG	Revised certificate of service to include Atty Asteak	160.00	0.10	16.00
	MSG	Prepared attorney verification re C. Eckman to attach to discovery responses	160.00	0.10	16.00
09/19/2024	MSG	Prepared additional documents re Friedman to be produced in discovery	160.00	0.60	96.00
	MSG	Prepared draft discovery requests directed to plaintiffs	160.00	0.80	128.00
09/23/2024	MSG	Revised and finalized discovery responses re UMBT, Jason Albert, and David Friedman (including verifications and cert. of service) and sent to attorney for review	160.00	1.30	208.00
	MSG	Prepared attorney verification re J. Friedman	160.00	0.10	16.00
	MSG	Prepared attorney verification re J Albert	160.00	0.10	16.00
	MSG	Revised responses to interrogatories and request for production of documents directed to David Friedman removing all objections per Judges order	160.00	0.60	96.00
09/24/2024	MSG	Revised responses to interrogatories and request for production			

			Rate	Hours	
		of documents directed to UMBT removing all objections per Judges order	160.00	0.20	32.00
	MSG	Revised responses to interrogatories and request for production of documents directed to J. Albert removing all objections per Judges order	160.00	0.20	32.00
09/25/2024	MSG	Revised interrogatories and RPD removing objections per Judge's Order re Johnathan Erler and sent to atty for review	160.00	0.40	64.00
09/27/2024	MSG	Finalized discovery responses for production to opposing counsel re UMBT, Friedman, Erler, Albert	160.00	0.80	128.00
	MSG	Revised discovery responses removing objections per judge's order re Eckman and Birmingham	160.00	0.30	48.00
	MSG	Prepare Finalized discovery responses for production to opposing counsel re Eckman and Birmingham	160.00	0.30	48.00
	MSG	Prepared correspondence to opposing counsel enclosing discovery responses	160.00	0.20	32.00
	MSG	Email to counsel enclosing correspondence and discovery request re all defendants	160.00	0.10	16.00
		FOR CURRENT SERVICES RENDERED		11.90	1,904.00

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
MELISSA S. GIAMMARINO	11.90	$160.00	$1,904.00

TOTAL CURRENT WORK	1,904.00
BALANCE DUE	$1,904.00

This statement contains information that is confidential and subject to attorney/client privilege.

GROSS McGINLEY LLP
ATTORNEYS AT LAW

TAX I.D. # 23-2007651

33 South Seventh Street
P. O. Box 4060
Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

Statement Date: 10/01/2024
Account No: 33486.0004 *
Statement No: 2

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: DECLARATORY/INJUCTIVE RELIEF - AXA

			Rate	Hours	
09/01/2024	AKC	Review Coyle discovery responses	160.00	0.30	48.00
	AKC	review correspondence from Coyle on status	160.00	0.30	48.00
09/03/2024	AKC	Electronic communication with twp manager re discovery	160.00	0.20	32.00
09/05/2024	AKC	Review correspondence from attorney asteak regarding motion for stay	160.00	0.10	16.00
	AKC	Review and follow up on discovery	160.00	0.40	64.00
09/06/2024	AKC	Prepare and circulate stipulation to amend caption	160.00	0.30	48.00
	AKC	Review correspondence and reply regarding documents from clients	160.00	0.20	32.00
	AKC	Electronic communication with counsel re pleadings	160.00	0.20	32.00
	AKC	Review emails and information from J Bermingham re discovery	160.00	1.00	160.00
09/09/2024	AKC	Prepare discovery responses	160.00	2.00	320.00
09/10/2024	JD	prepare draft interrogatory responses for Eickman, Friedman, Alber and Erler.	160.00	1.40	224.00
	JD	Prepare responses to Request for Production of Documents for J. Bermingham.	160.00	3.00	480.00
09/11/2024	JD	Interoffice conference to evaluate case and most efficient procedure for redacting and turning over discovery.	160.00	0.80	128.00
	JD	Review correspondence from Atty. Pickler regarding late discovery responses and motion for sanctions	160.00	0.20	32.00
	AKC	Review correspondence from counsel for RPL re discovery	160.00	0.20	32.00
	AKC	Revise production for Bermingham	160.00	0.50	80.00
	AKC	Review Eckman draft responses	160.00	0.30	48.00

UPPER MOUNT BETHEL TOWNSHIP

October 01, 2024
Account No.: 33486-0004*
Statement No: 2

RE: DECLARATORY/INJUCTIVE RELIEF - AXA

			Rate	Hours	
09/12/2024	JD	Prepare Cori Eckman's response to Request for Production of Documents	160.00	0.40	64.00
	JD	Prepare discovery responses for David Freidman's Request for Production of Documents	160.00	0.40	64.00
	JD	Revise John Bermingham's interrogatories	160.00	0.20	32.00
	JD	Prepare discovery responses to Request for Production of Documents for Jason Alber	160.00	0.40	64.00
	JD	Prepare responses to Request for Production of Documents for Jonathan Erler	160.00	0.40	64.00
	JD	Electronic communication to John Bermingham to review discovery responses and sign verification	160.00	0.20	32.00
	JD	Electronic communication to Cori Eckman to review discovery responses and sign verification	160.00	0.20	32.00
	JD	Electronic communication to Mr. Albert to review discovery responses and sign verification	160.00	0.20	32.00
	JD	Electronic communication from John Bermingham confirming discovery responses and a signed verification	160.00	0.20	32.00
	AKC	Review additional emails from client Bermingham for production	160.00	0.50	80.00
	AKC	Review and regarding responses of township to discovery and confirmation of lack of responsive documentation	160.00	0.30	48.00
	AKC	Electronic communication with counsel for plaintiff regarding partial production	160.00	0.20	32.00
09/13/2024	JD	Interoffice conference to evaluate case and response to motion to stay	160.00	0.40	64.00
	JD	Prepare response to intervenor's motion to stay mandamus action	160.00	2.80	448.00
	JD	Research applicable statutes and case law, as well as authorities addressed in Intervenor's motion in preparation of drafting response to Motion to Stay	160.00	2.00	320.00
	AKC	Attend legal coordination meeting	160.00	1.00	160.00
09/16/2024	JD	Electronic communication from opposing Counsel regarding outstanding discovery responses	160.00	0.20	32.00
	JD	Electronic communication from client Jason Albert regarding non communications fitting the discovery requests	160.00	0.20	32.00
	JD	Electronic communication from Attorney Picker re: intention to present motion for sanctions	160.00	0.20	32.00
	JD	Review Attorney Picker's Motion for sanctions and proposed order	160.00	0.20	32.00
	AKC	Review Jason Albert responses to discovery	160.00	1.00	160.00
	AKC	Review PROPOSED MOTION FROM COUNSEL FOR rpl	160.00	0.30	48.00
	AKC	Review issues related to motion for stay and timing	160.00	0.20	32.00
09/17/2024	JD	Electronic communication to Attorney Picker regarding intended motion for sanctions and confirming we do not need exhibits.	160.00	0.20	32.00
	JD	revise Jason Albert's responses to request for production of documents	160.00	0.60	96.00
	JD	Electronic communication from Attorney Gary Asteak re: no objection to Motion to Strike Objections and Sanctions	160.00	0.20	32.00
	AKC	Review correspondence from counsel for Authority	160.00	0.20	32.00
	AKC	Review communication and request for continuance	160.00	0.20	32.00
09/18/2024	JD	Electronic communication from client regarding his opinion on proceeding without Attorney Blazey present at the meeting.	160.00	0.20	32.00

UPPER MOUNT BETHEL TOWNSHIP

RE: DECLARATORY/INJUCTIVE RELIEF - AXA

			Rate	Hours	
	JD	Review correspondence between Attorney Doug Blazey and Solicitor Chad DeFelice regarding requesting a medical continuance	160.00	0.20	32.00
	JD	Review application for continuance and order granting continuance on Motion to stay to the October 2, misc list	160.00	0.20	32.00
	JD	Electronic communication with Jason Albert regarding his discovery responses to review and verify	160.00	0.20	32.00
	JD	Electronic communication from/to Jason Albert regarding questions to Discovery Responses	160.00	0.40	64.00
	JD	Electronic communication from Jason Albert with verification	160.00	0.20	32.00
	JD	Electronic communication Mr. Friedman and Erler requesting responses to Plaintiff's discovery requests.	160.00	0.40	64.00
	JD	Electronic communication from/to John Bermingham regarding contact information for the other supervisors	160.00	0.20	32.00
	AKC	Review discovery responses remaining supervisors	160.00	0.20	32.00
09/19/2024	JD	Electronic communication with John Bermingham regarding communication with other supervisors whose responses are outstanding	160.00	0.20	32.00
	JD	Electronic communication with Jonathan Erler	160.00	0.20	32.00
	JD	Attend UMBT Zoning Hearing Board Meeting for public comments before closings	160.00	5.00	800.00
	AKC	Review documents from Friedman	160.00	0.60	96.00
09/20/2024	JD	Revise UMBT responses to Plaintiff's Interrogatories and Request for Production	160.00	1.60	256.00
	JD	Revise UMBT's responses	160.00	0.20	32.00
	JD	Electronic communication to Nick Graziano re: reviewing UMBT responses and signing the verification	160.00	0.20	32.00
	JD	Electronic communication from N. Graziano with his signed verification	160.00	0.20	32.00
09/23/2024	JD	Electronic communication Jonathan Erler requesting status of supervisor emails and to review responses and sign verification	160.00	0.20	32.00
	JD	Review The Honorable Abraham P. Kassis' signed order imposing sanctions if responses not completed within seven days of the order	160.00	0.20	32.00
	AKC	Attend motions court	160.00	3.00	480.00
	AKC	Review and direct additional discovery responses	160.00	0.50	80.00
	AKC	Electronic communication with counsel for Coyle	160.00	0.20	32.00
09/24/2024	JD	Electronic communication from Attorney Ray Wittekind	160.00	0.20	32.00
	JD	Electronic communication from Jonathan Erler confirming responses. Advised him that verification is still needed.	160.00	0.20	32.00
	JD	Telephone call from Attorney Ray Whittker	160.00	0.20	32.00
	AKC	Review final two supervisor responses	160.00	0.30	48.00
09/25/2024	JD	Electronic communication with Twp. N. Graziano confirming no documents that are responsive to requests	160.00	0.20	32.00
	JD	Review correspondence from opposing counsel Wittikind and Kimball	160.00	0.20	32.00
	JD	Electronic communication from N. Graziano regarding discovery responses	160.00	0.20	32.00
	JD	Electronic communication to N. Graziano regarding confirming township has no documentation responsive to discovery			

			Rate	Hours	
		requests	160.00	0.20	32.00
	JD	Electronic communication with N. Graziano confirming that the township has no documents of any kind responsive to the requests.	160.00	0.20	32.00
09/27/2024	JD	Review correspondence to opposing counsel serving all our discovery responses	160.00	0.20	32.00
	AKC	Attend meeting to give update on suit to public	160.00	2.50	400.00
09/30/2024	AKC	Electronic communication with counsel re motions	160.00	0.20	32.00
	AKC	Electronic communication with RPL counsel re stipulation to amend caption	160.00	0.20	32.00
		FOR CURRENT SERVICES RENDERED		44.40	7,104.00

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
JULIANNE DANCHAK	26.80	$160.00	$4,288.00
ADRIAN K. COUSENS	17.60	160.00	2,816.00

PREVIOUS BALANCE	$7,488.00
TOTAL CURRENT WORK	7,104.00
BALANCE DUE	$14,592.00

This statement contains information that is confidential and subject to attorney/client privilege.

GROSSMCGINLEY LLP
ATTORNEYS AT LAW

33 South Seventh Street
P. O. Box 4060
Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

TAX I.D. # 23-2007651

Statement Date: 11/01/2024
Account No: 33486.0004 *
Statement No: 3

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: DECLARATORY/INJUCTIVE RELIEF - AXA
AXA Ref No. 10471127
River Pointe v. UMBT
Northampton - C-48-CV-2024-03571

			Rate	Hours	
10/01/2024	JD	Research Northampton County Local Court rules for timelines for filing a brief	160.00	0.20	32.00
	AKC	Review and file stipulation	160.00	0.20	32.00
	AKC	Prepare for argument - case law for opposition to stay	160.00	1.20	192.00
	AKC	Prepare for motion regarding stay	160.00	1.60	256.00
10/02/2024	JD	Revise Supervisor Submission	160.00	1.80	288.00
10/03/2024	AKC	Review sign and file stipulation	160.00	0.20	32.00
	JD	Attend Final UMBT ZHB and vote on special exception use	160.00	5.60	896.00
10/07/2024	AKC	Attend legal coordination meeting	160.00	1.00	160.00
10/10/2024	AKC	Review issues related to other use for site impact on suit	160.00	0.20	32.00
10/14/2024	AKC	Electronic communication with claims re status	160.00	0.40	64.00
10/21/2024	AKC	Electronic communication with client re order	160.00	0.20	32.00
10/24/2024	AKC	Review communication from counsel for Coyle to plaintiff	160.00	0.20	32.00
10/27/2024	AKC	Review email from client re data centers	160.00	0.20	32.00
10/28/2024	AKC	Attend meeting with client to discuss strategy	160.00	1.00	160.00

UPPER MOUNT BETHEL TOWNSHIP

November 01, 2024
Account No.: 33486-0004*
Statement No: 3

RE: DECLARATORY/INJUCTIVE RELIEF - AXA
AXA Ref No. 10471127
River Pointe v. UMBT
Northampton - C-48-CV-2024-03571

		Rate	Hours	
	FOR CURRENT SERVICES RENDERED		14.00	2,240.00

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
JULIANNE DANCHAK	7.60	$160.00	$1,216.00
ADRIAN K. COUSENS	6.40	160.00	1,024.00

10/31/2024	Cost Advanced:	
	TRAVEL TO/FROM NORTHAMPTON CCP	24.12
	TOTAL ADVANCES	24.12
	PREVIOUS BALANCE	$14,592.00
	TOTAL CURRENT WORK	2,264.12
	BALANCE DUE	$16,856.12

YOUR ACCOUNT IS 60 DAYS PAST DUE.

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GROSS McGINLEY LLP
ATTORNEYS AT LAW

33 South Seventh Street
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Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

TAX I.D. # 23-2007651

Statement Date: 12/01/2024
Account No: 33486.0004 *
Statement No: 4

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: DECLARATORY/INJUCTIVE RELIEF - AXA
AXA Ref No. 10471127
River Pointe v. UMBT
Northampton - C-48-CV-2024-03571

			Rate	Hours	
11/09/2024	AKC	Review notice re dismissal of one of actions	160.00	0.20	32.00
11/11/2024	AKC	Review correspondence from counsel regarding discovery from plaintiff	160.00	0.20	32.00
11/12/2024	AKC	Attend executive session	160.00	0.40	64.00
11/13/2024	AKC	Review motion to compel filed by counsel for Engineer against plaintiff	160.00	0.20	32.00
11/17/2024	AKC	Review communication regarding meeting	160.00	0.20	32.00
11/19/2024	JD	Review correspondence from Attorney Pickler re: withdrawing Motion	160.00	0.20	32.00
	AKC	Review discovery produced by plaintiff	160.00	1.00	160.00
11/21/2024	AKC	Review correspondence from counsel for Plaintiff re motion	160.00	0.20	32.00
	AKC	Review praecipe to withdraw motion filed by co-defendant	160.00	0.20	32.00
11/22/2024	AKC	Attend conference with client to discuss strategy	160.00	1.00	160.00
11/26/2024	AKC	Review information related to expert support	160.00	0.20	32.00
		FOR CURRENT SERVICES RENDERED		4.00	640.00

UPPER MOUNT BETHEL TOWNSHIP

December 01, 2024
Account No.: 33486-0004*
Statement No: 4

RE: DECLARATORY/INJUCTIVE RELIEF - AXA
AXA Ref No. 10471127
River Pointe v. UMBT
Northampton - C-48-CV-2024-03571

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
JULIANNE DANCHAK	0.20	$160.00	$32.00
ADRIAN K. COUSENS	3.80	160.00	608.00

PREVIOUS BALANCE	$16,856.12
TOTAL CURRENT WORK	640.00
BALANCE DUE	$17,496.12

YOUR ACCOUNT IS 90 DAYS PAST DUE.

This statement contains information that is confidential and subject to attorney/client privilege.

GROSSMCGINLEY LLP
ATTORNEYS AT LAW

33 South Seventh Street
P. O. Box 4060
Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

TAX I.D. # 23-2007651

Statement Date: 10/01/2024
Account No: 33486.0000 Q
Statement No: 7

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: ZONING

DUPLICATE

			Rate	Hours	
06/17/2024	AKC	Attend Zoning Special Exceptions Hearing	160.00	3.50	560.00
07/11/2024	JAU	Prepare for and attend Zoning Hearing and review prior transcripts and testimony for upcoming hearing.	160.00	4.00	640.00
07/30/2024	AKC	Attend Zoning Hearing Board Meeting 8	160.00	3.50	560.00
09/01/2024	AKC	Electronic communication with J Coyle re documents submitted to the Planning Commission	160.00	0.20	32.00
	AKC	Electronic communication with all counsel re planning commission	160.00	0.40	64.00
09/09/2024	AKC	Review emails regarding exhibits	160.00	0.20	32.00
09/10/2024	AKC	Review email exchange on closings and time limits	160.00	0.20	32.00
09/16/2024	AKC	Prepare correspondence to Twp engineer on suggested conditions	160.00	0.40	64.00
09/18/2024	AKC	Review correspondence regarding medical issue and closings	160.00	0.20	32.00
	AKC	Electronic communication with J Bermingham re status	160.00	0.20	32.00
	AKC	Review correspondence from J COyle on history and conditions for zoning issues	160.00	0.40	64.00
09/19/2024	AKC	Attend ZHB meeting number 10	160.00	3.50	560.00
	AKC	Review correspondence from Planning Commission deciding not to take action	160.00	0.20	32.00
09/24/2024	AKC	Review communication between counsel and zoning officer re			

			Rate	Hours	
		determinations	160.00	0.20	32.00
	AKC	Review recommended conditions from Engineer	160.00	0.40	64.00
09/25/2024	AKC	Electronic communication with J Coyle on recommended conditions	160.00	0.20	32.00
09/26/2024	AKC	Electronic communication with Atty Blazey re motion to recuse	160.00	0.20	32.00
09/30/2024	AKC	Prepare closing and listing of conditions	160.00	3.00	480.00
		FOR CURRENT SERVICES RENDERED		20.90	3,344.00

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
ADRIAN K. COUSENS	16.90	$160.00	$2,704.00
JASON A. ULRICH	4.00	160.00	640.00

	PREVIOUS BALANCE	$4,484.52
	TOTAL CURRENT WORK	3,344.00
09/17/2024	PAYMENT	-1,984.00
09/17/2024	PAYMENT	-574.52
	TOTAL PAYMENTS	-2,558.52
	BALANCE DUE	$5,270.00

This statement contains information that is confidential and subject to attorney/client privilege.

GROSS McGINLEY LLP
ATTORNEYS AT LAW

TAX I.D. # 23-2007651

33 South Seventh Street
P. O. Box 4060
Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

Statement Date: 11/01/2024
Account No: 33486.0000 Q
Statement No: 8

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: ZONING

DUPLICATE

			Rate	Hours	
10/01/2024	AKC	Review list of additional conditions suggested by citizens to supervisor Freidman	160.00	0.20	32.00
	AKC	Prepare legal brief for submission ZHB	160.00	3.00	480.00
10/02/2024	AKC	Revise and finalize brief and send to client and ZHB	160.00	1.00	160.00
	AKC	Review email re exhibits from Blazey - Zoning	160.00	0.20	32.00
10/03/2024	AKC	Telephone conference with J Bermingham re hearing 11	160.00	0.20	32.00
	AKC	Attend hearing 11 ZHB	160.00	3.50	560.00
10/17/2024	AKC	Review correspondence from Spadoni re ZHB decision	160.00	0.10	16.00
		FOR CURRENT SERVICES RENDERED		8.20	1,312.00

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
ADRIAN K. COUSENS	8.20	$160.00	$1,312.00

	PREVIOUS BALANCE	$5,270.00
	TOTAL CURRENT WORK	1,312.00
10/22/2024	PAYMENT	-1,926.00

UPPER MOUNT BETHEL TOWNSHIP

November 01, 2024
Account No.: 33486-0000Q
Statement No: 8

RE: ZONING

BALANCE DUE $4,656.00

YOUR ACCOUNT IS 30 DAYS PAST DUE.

This statement contains information that is confidential and subject to attorney/client privilege.

GROSS McGINLEY LLP
ATTORNEYS AT LAW

33 South Seventh Street
P. O. Box 4060
Allentown, PA 18105-4060
Tel. No. 610-820-5450
Fax No. 610-820-6006

TAX I.D. # 23-2007651

Statement Date: 12/01/2024
Account No: 33486.0000 Q
Statement No: 9

UPPER MOUNT BETHEL TOWNSHIP
ATTN: DIANN EDEN
387 YE OLDE HIGHWAY
PO BOX 520
MOUNT BETHEL, PA 18343

RE: ZONING

DUPLICATE

			Rate	Hours	
11/12/2024	AKC	Review CORRESPONDENCE FROM Spadoni	160.00	0.10	16.00
11/15/2024	AKC	Review decision of zoning Hearing Board	160.00	1.00	160.00
11/18/2024	AKC	Review email from Spadoni re appeal	160.00	0.10	16.00
11/25/2024	AKC	Review correspondence from Spadoni	160.00	0.20	32.00
	AKC	Attend executive session re appeal of Zoning Hearing Board	160.00	0.60	96.00
11/27/2024	AKC	Review process for appeal of ZHB	160.00	0.30	48.00
	JAU	Research Land Use Appeal issue.	160.00	1.00	160.00
		FOR CURRENT SERVICES RENDERED		3.30	528.00

Recapitulation

Timekeeper	Hours	Hourly Rate	Total
ADRIAN K. COUSENS	2.30	$160.00	$368.00
JASON A. ULRICH	1.00	160.00	160.00

PREVIOUS BALANCE	$4,656.00
TOTAL CURRENT WORK	528.00

UPPER MOUNT BETHEL TOWNSHIP

December 01, 2024
Account No.: 33486-0000Q
Statement No: 9

RE: ZONING

11/19/2024	PAYMENT	-3,344.00
	BALANCE DUE	$1,840.00

This statement contains information that is confidential and subject to attorney/client privilege.

Invoice #: 2473921

June 26, 2024

Date	Tkpr	Description	Hours	Rate	Amount
5/28/24	MSAN	Prepared supplements to Answer to third Complaint (4 pages typed)	3.70	270.00	999.00
5/28/24	AYON	Communication with client regarding the status of Justin Coyle as a township employee and execution of the verification to client's Answer to Plaintiffs' Complaint, in order to timely file the same.	.30	245.00	73.50
5/28/24	AYON	Communication with UMBT solicitor in order to verify client's Answer to Plaintiffs' Complaint and timely file the same.	.30	245.00	73.50
5/28/24	AYON	Revise client's Answer to Plaintiffs' Complaint for Injunctive and Declaratory Relief, noting that Justin Coyle is not an employee of UMBT, but instead a "vendor".	.40	245.00	98.00
5/28/24	AYON	Review communication from insurance adjuster regarding policy coverage for Justin Coyle, Township Engineer, after determining that Coyle is not an employee of UMBT, but instead a vendor.	.10	245.00	24.50
5/28/24	AYON	Communication with Justin Coyle's counsel, Ray Wittekind, regarding representation of Justin Coyle, as Coyle is a vendor of UMBT and not an employee and, as such, he is not covered under UMBT's policy.	.30	245.00	73.50
6/14/24	MMIL	Preparation and analysis of file materials to prepare for transfer to new counsel, including assessment of pleadings and correspondence.	3.30	270.00	891.00
		TOTAL	**63.00**		**16,022.50**

SUMMARY OF PROFESSIONAL SERVICES

Timekeeper	Tkpr	Title	Hours	Rate	Total
Michael Miller	MMIL	Partner	14.60	270.00	3,942.00
Meghan Wynkoop	MSAN	Partner	8.90	270.00	2,403.00
Grace Miller	GSMI	Associate	32.40	245.00	7,938.00
ALEXIS YOUNG	AYON	Associate	7.10	245.00	1,739.50
TOTALS			**63.00**		**$ 16,022.50**

Date	Tkpr	Description	Hours	Rate	Amount
4/30/24	GSMI	Analysis of plaintiff document production, 11.21.2022 file - document RDCNJ00026166 - list of sales of diabetic strips to various states (NJ, CA, MI, etc.) from Winter of 2018 (December), including cost, amount, and specific pharmacies and their location, looking potential evidence and documentation of Roche knowledge in 2014 or prior of Alliance's alleged fraudulent behavior in support of statute of limitations defense. (516 pages) (Approved by J. Parker, 2/29/24).	5.10	245.00	1,249.50
5/03/24	GSMI	Analysis of newly provided complaint from insured in preparation of answer. (141 pages)	1.90	245.00	465.50
5/13/24	GSMI	Preparation of initial report to insured and insurer, further development of the Sunshine Act legal analysis as related to the meeting advertisement and the unadvertised vote that occurred.	2.20	245.00	539.00
5/13/24	AYON	Strategy conversation with handling attorney regarding the multiple complaints filed in the instant case and how to address the same in client's most recent answer.	.20	245.00	49.00
5/14/24	MSAN	Prepared supplements to initial report based upon intended litigation strategy and updated legal analysis (3 pages typed)	3.10	270.00	837.00
5/14/24	GSMI	Communication with insured regarding verifying service of the second complaint.	.70	245.00	171.50
5/15/24	GSMI	Preparation of initial report for insurer and insured, further development of the legal analysis of the alleged Pennsylvania Constitution violations and the interplay with the Sunshine Act, and development of the budget and remaining sections.	2.30	245.00	563.50
5/18/24	MMIL	Preparation of and analysis of preliminary liability report with recommendations as to defense strategy and exposure.	2.60	270.00	702.00
5/21/24	MMIL	Email exchange with client and carrier re: update as to Township Solicitor discussions.	.20	270.00	54.00
5/23/24	AYON	Review Plaintiffs' Complaint for Injunctive and Declaratory Relief, and accompanying exhibits, in order to prepare an Answer to the same. 141 pages reviewed.	1.20	245.00	294.00
5/24/24	AYON	Prepare client's Answer to Plaintiffs' Complaint for Injunctive and Declaratory Relief, denying the allegations therein. 27 pages typed, double spaced.	4.30	245.00	1,053.50
5/28/24	MMIL	Preparation of Answer to Plaintiffs' Third Complaint (26.4 pages, double-spaced).	2.60	270.00	702.00

Invoice #: 2473921

June 26, 2024

Date	Tkpr	Description	Hours	Rate	Amount
4/19/24	GSMI	Analysis of plaintiff document production, 11.21.2022 file - document RDCNJ00026166 - list of sales of diabetic strips to various states (NJ, CA, MI, etc.) from late summer into early fall of 2018 (August/September), including cost, amount, and specific pharmacies and their location, looking potential evidence and documentation of Roche knowledge in 2014 or prior of Alliance's alleged fraudulent behavior in support of statute of limitations defense. (642 pages) (Approved by J. Parker, 2/29/24).	6.40	245.00	1,568.00
4/22/24	GSMI	Initial client interview with insured's regarding second complaint.	.60	245.00	147.00
4/22/24	GSMI	Analysis of potential defenses specifically regarding allegations of violations of the PA constitution and speech based on three minute time limit for public comment following initial client interview information and context that the three minute time limit is commonplace in meetings.	1.80	245.00	441.00
4/22/24	GSMI	Final preparation of initial client interview outline prior to initial client interview.	.50	245.00	122.50
4/24/24	GSMI	Preparation of initial report for insurer and insured, development of....	1.40	245.00	343.00
4/25/24	MMIL	Analysis of initial claims file, including complaint, documents provided by the insured, preliminary investigative materials provided by the insured, emails and related communications (312 pages analyzed).	2.70	270.00	729.00
4/25/24	GSMI	Preparation of initial report for insurer and insured, development of the factual background section.	1.10	245.00	269.50
4/29/24	GSMI	Preparation of initial report for insured and insurer, development of the legal analysis of the Sunshine Act claims as related to the special meeting at issue.	1.80	245.00	441.00
4/30/24	GSMI	Preparation of initial report for insured and insurer, development of the legal analysis of Plaintiff's PA constitutional claims as related to the reasonableness of the three minute time limit for public comment as an infringement upon Plaintiff's free speech and free gathering abilities.	1.90	245.00	465.50

Invoice #: 2473921

June 26, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/01/24	GSMI	Preparation of and communication with insured regarding setting initial meeting time as well as requesting requisite documents for further investigation.	.60	245.00	147.00
4/01/24	GSMI	Initial analysis of documentation sent by insured and insurer, including emails and Complaint involving claims of Sunshine Act and PA Constitution (23 pages).	.70	245.00	171.50
4/02/24	MSAN	Analysis of initial complaints and contemporaneously strategized defense.	2.10	270.00	567.00
4/02/24	GSMI	Analysis of additional complaint provided by insured, related to initial complaint but additional plaintiff.	.40	245.00	98.00
4/03/24	GSMI	Communication with the insured regarding newly provided complaint and setting initial client interview.	.20	245.00	49.00
4/04/24	GSMI	Communication with insured regarding setting up initial client interview time.	.10	245.00	24.50
4/05/24	GSMI	Communication with insured regarding setting up initial client interview.	.20	245.00	49.00
4/12/24	GSMI	Communication with insured regarding setting time for initial client interview.	.20	245.00	49.00
4/15/24	MMIL	Analysis of initial claims file, including Complaint, documents provided by insured for initial investigation, background information from claimant and client via social media and Internet and miscellaneous documents to begin preliminary liability report (263 pages analyzed).	2.80	270.00	756.00
4/15/24	GSMI	Preparation of initial client interview outline.	1.30	245.00	318.50
4/15/24	GSMI	Communication with insured regarding setting up initial client meeting interview.	.30	245.00	73.50
4/18/24	MMIL	Analysis of Principe to Discontinue related litigation.	.20	270.00	54.00
4/18/24	MMIL	Email exchange with client and carrier re: update as to defense strategy in light of discontinuance of related cases.	.20	270.00	54.00
4/18/24	GSMI	Communication with insured and insurer regarding praecipe to discontinue first lawsuit.	.20	245.00	49.00
4/19/24	GSMI	Communication with insured regarding initial client interview meeting time.	.50	245.00	122.50

MARGOLIS EDELSTEIN

170 S Independence Mall W
Curtis Center, Ste 400E
Philadelphia, PA 19106
Tel: 215-922-1100 | Fax: 215-922-1772
www.margolisedelstein.com

June 26, 2024

Anthony Khoury
AXA XL

Invoice #: 2473921
Client #: 23800
Matter #: 0-00278

Electronic Invoice

INVOICE SUMMARY
FINAL INVOICE

For professional services rendered through June 26, 2024:

RE: Upper Mount Bethel Township, Upper Mount Bethel Township Municipal Authority v.

Insured	**Upper Mount Bethel Township**
Claimant	**Upper Mount Bethel Township Municipal Authority**
Claim Number	**10468224**

Professional Services	$ 16,022.50
Total Costs	$ .00
BALANCE DUE THIS INVOICE	**$ 16,022.50**

INVOICES ARE PAYABLE UPON RECEIPT
TAX I.D. NUMBER 23-2049922

Invoice #: 2473921

June 26, 2024

Date	Tkpr	Description	Hours	Rate	Amount
5/28/24	MSAN	Prepared supplements to Answer to third Complaint (4 pages typed)	3.70	270.00	999.00
5/28/24	AYON	Communication with client regarding the status of Justin Coyle as a township employee and execution of the verification to client's Answer to Plaintiffs' Complaint, in order to timely file the same.	.30	245.00	73.50
5/28/24	AYON	Communication with UMBT solicitor in order to verify client's Answer to Plaintiffs' Complaint and timely file the same.	.30	245.00	73.50
5/28/24	AYON	Revise client's Answer to Plaintiffs' Complaint for Injunctive and Declaratory Relief, noting that Justin Coyle is not an employee of UMBT, but instead a "vendor".	.40	245.00	98.00
5/28/24	AYON	Review communication from insurance adjuster regarding policy coverage for Justin Coyle, Township Engineer, after determining that Coyle is not an employee of UMBT, but instead a vendor.	.10	245.00	24.50
5/28/24	AYON	Communication with Justin Coyle's counsel, Ray Wittekind, regarding representation of Justin Coyle, as Coyle is a vendor of UMBT and not an employee and, as such, he is not covered under UMBT's policy.	.30	245.00	73.50
6/14/24	MMIL	Preparation and analysis of file materials to prepare for transfer to new counsel, including assessment of pleadings and correspondence.	3.30	270.00	891.00
		TOTAL	**63.00**		**16,022.50**

SUMMARY OF PROFESSIONAL SERVICES

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ALEXIS YOUNG	AYON	Associate	7.10	245.00	1,739.50
TOTALS			**63.00**		**$ 16,022.50**

Invoice #: 2473921

June 26, 2024

Date	Tkpr	Description	Hours	Rate	Amount
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June 26, 2024

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4/30/24	GSMI	Preparation of initial report for insured and insurer, development of the legal analysis of Plaintiff's PA constitutional claims as related to the reasonableness of the three minute time limit for public comment as an infringement upon Plaintiff's free speech and free gathering abilities.	1.90	245.00	465.50

Invoice #: 2473921

June 26, 2024

PROFESSIONAL SERVICES

Date	Tkpr	Description	Hours	Rate	Amount
4/01/24	GSMI	Preparation of and communication with insured regarding setting initial meeting time as well as requesting requisite documents for further investigation.	.60	245.00	147.00
4/01/24	GSMI	Initial analysis of documentation sent by insured and insurer, including emails and Complaint involving claims of Sunshine Act and PA Constitution (23 pages).	.70	245.00	171.50
4/02/24	MSAN	Analysis of initial complaints and contemporaneously strategized defense.	2.10	270.00	567.00
4/02/24	GSMI	Analysis of additional complaint provided by insured, related to initial complaint but additional plaintiff.	.40	245.00	98.00
4/03/24	GSMI	Communication with the insured regarding newly provided complaint and setting initial client interview.	.20	245.00	49.00
4/04/24	GSMI	Communication with insured regarding setting up initial client interview time.	.10	245.00	24.50
4/05/24	GSMI	Communication with insured regarding setting up initial client interview.	.20	245.00	49.00
4/12/24	GSMI	Communication with insured regarding setting time for initial client interview.	.20	245.00	49.00
4/15/24	MMIL	Analysis of initial claims file, including Complaint, documents provided by insured for initial investigation, background information from claimant and client via social media and Internet and miscellaneous documents to begin preliminary liability report (263 pages analyzed).	2.80	270.00	756.00
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4/18/24	GSMI	Communication with insured and insurer regarding praecipe to discontinue first lawsuit.	.20	245.00	49.00
4/19/24	GSMI	Communication with insured regarding initial client interview meeting time.	.50	245.00	122.50

MARGOLIS EDELSTEIN

170 S Independence Mall W
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Philadelphia, PA 19106
Tel: 215-922-1100 | Fax: 215-922-1772
www.margolisedelstein.com

June 26, 2024

Nick Graziano
Upper Mount Bethel Township

Invoice #: 2473921
Client #: 23800
Matter #: 0-00278

Electronic Invoice

INVOICE SUMMARY
FINAL INVOICE

For professional services rendered through June 26, 2024:

RE: Upper Mount Bethel Township, Upper Mount Bethel Township Municipal Authority v.

Insured	**Upper Mount Bethel Township**
Claimant	**Upper Mount Bethel Township Municipal Authority**
Claim Number	**10468224**

Professional Services	$ 16,022.50
Total Costs	$ .00
BALANCE DUE THIS INVOICE	**$ 16,022.50**

INVOICES ARE PAYABLE UPON RECEIPT
TAX I.D. NUMBER 23-2049922