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**FEES AND COSTS INCURRED DEFENDING ACTIONS FILED BY FRED HALL**

**PRE-LITIGATION AND LITIGATION PAGE 1 OF 3**

2011 PRE-SUIT MEDIATION FILED BY HALL (required before can file lawsuit).

(See Lawsuit Notebook Tab 2 for basic documentation and invoices).

Time covered: November 15, 2011 through December 17, 2012

Fees incurred: \$3,175.00  
Credit for fees given: - 800.00  
Total fees billed: \$2,375.00

Cost of mediator: \$ 900.00  
Total billed \$3,275.00

**Summary**

Total Incurred: \$4,075.00  
**Total Credit Given: - 800.00**  
Total Billed: \$3,275.00  
Paid by Association: \$3,275.00  
Balance Due: \$ 0.00

**Amount asking Judge to award from Hall: \$3,275.00**

DECLARATORY AND INJUNCTIVE ACTION FILED IN 2013 – CA13-0848:

(See Lawsuit Notebook Tab 6 for basic documentation and invoices)

Time covered: May 24, 2013 through December 22, 2016 (plus additional fees paid to experts):

Fees incurred: \$ 167,082.00  
Credit for fees given: - 20,375.00  
Additional Credits based on  
Fee Hearing Adjustments  
Agreed to by RPP PA - 11,222.50  
Total fees billed: \$ 135,484.50

Costs Incurred: \$ 8,508.39  
Cost of Expert Witness: \$ 9,792.15  
Total costs billed: \$ 18,300.54  
Total Billed: \$153,785.04

**Summary**

Total Incurred: \$185,382.54  
**Total Credits Given: - 31,597.50**  
Total Billed: \$153,785.04  
Paid by Association to Firm: - 52,845.75  
Paid by Association to Expert: - 5,300.00  
Balance Due: \$ 95,639.29

**Amount asking Judge to award from Hall: \$151,430.36**

**PRE-LITIGATION AND LITIGATION PAGE 2 OF 3**

Fee Hearing in the Declaratory Action pending in Circuit Court St. Johns County:

(See Lawsuit Notebook Tab 7 for basic documentation and invoices)

Time covered: December 23, 2016 through August 4, 2017:

Fees incurred:	\$ 21,887.50		
Credit for fees given:	<u>- 2,237.50</u>		
Total fees billed:	\$ 19,650.00	<b><u>Summary</u></b>	
		Total Incurred:	\$ 27,787.50
Cost of Expert Witness:	<u>\$ 5,900.00</u>	<b>Total Credit Given:</b>	<b>- 2,237.50</b>
Total billed	\$ 25,550.00	Total Billed:	<u>\$ 25,550.00</u>
		Paid by Association to Firm:	0.00
		Paid by Association to Expert:	<u>\$ 4,525.00</u>
		Due from Association:	\$ 21,025.00

**Amount asking Judge to award from Hall: \$24,725.00**

TOTAL ASKED JUDGE TO AWARD FROM HALL TO DATE –  
WAITING FOR JUDGMENT

PRESUIT MEDIATION	\$ 3,275.00
DEC ACTION	\$151,430.36
FEE HEARING	<u>\$ 24,725.00</u>
	<b>\$179,430.36</b>

Appeal of Final Judgment from Declaratory Action to 5<sup>th</sup> DCA (Hall requests New Trial):

(See Lawsuit Notebook Tab 8 for basic documentation and invoices)

Time covered: February 2, 2017 to August 23, 2017:

Fees Incurred:	\$ 17,550.00		
Credit for fees given:	<u>-5,000.00</u>		
Total fees billed:	\$ 12,550.00	<b><u>Summary</u></b>	
		Total Fees Incurred:	\$ 17,550.00
		<b>Total Credit Given:</b>	<b>- 5,000.00</b>
		Total Billed:	<u>\$ 12,550.00</u>
		Paid by Association to Firm:	0.00
		Paid by Association to Mediator:	<u>\$ 891.25</u>
		Balance Due to Firm:	\$ 12,550.00

Amount asking Judge to award from Hall: \$ TBD AFTER APPEAL DECIDED

**PRE-LITIGATION AND LITIGATION PAGE 3 OF 3**

Hall v. Southcreek and Webber - Declaratory Action in St. Johns County.  
(2016 Assessment and Lien):  
(See Lawsuit Notebook Tab 9 for basic documentation)

Time covered: June 23, 2017 to August 4, 2017:

Fees Incurred: \$ 4,312.50  
Credit for fees given: 0.00  
Total fees billed: \$ 4,312.50

**Summary**

Total Incurred: \$ 4,312.50  
Total Credit Given: - 0.00  
Total Billed: \$ 4,312.50  
Paid by Association to Firm: 0.00  
Due from Association: \$ 4,312.50

Amount asking Judge to award from Hall: \$ TBD

**ARBITRATIONS AND APPEALS FROM ARBITRATIONS (PAGE 1 OF 2):**

Mary Stewart – Recall of Board July 2017/DBPR Recall Arbitration Case No. 2017-039253

Time covered: July 26, 2017 to August 4, 2017:

Fees Incurred:	\$ 1,375.00		
Credit for fees given:	<u>0.00</u>		
Total fees billed:	\$ 1,375.00	<b><u>Summary</u></b>	
		Total Incurred:	\$ 1,596.34
Cost Incurred:	<u>\$ 221.31</u>	Total Credit Given:	- 0.00
Total billed	\$ 1,596.34	Total Billed:	\$ 1,596.34
		Total Paid by Assoc. to Firm	<u>\$ 1,500.00</u>
		Due from Association:	\$ 96.34

Amount asking from DBPR to award to Southcreek : \$ TBD

**BINDING ARBITRATION 2010, 2011, 2012 AND 2013 ELECTIONS:**

(See Lawsuit Notebook Tab 3 for basic documentation and invoices)

Time covered: April 15, 2014 through April 26, 2015:

Fees incurred:	\$3,837.00		
Credit for fees given:	<u>- 1,362.71</u>		
Total fees billed:	\$2,474.29	<b><u>Summary</u></b>	
		Total Incurred:	\$3,942.18
Costs incurred:	<u>105.18</u>	<b>Total Credit Given:</b>	<b>- 1,362.71</b>
Total Billed:	\$2,579.47	Total Billed:	<u>\$2,579.47</u>
		Paid by Association:	\$2,579.47
		<b>Reimbursed –F. Hall per Order:</b>	<b><u>- 2,474.29</u></b>
		<b>Net paid by Association:</b>	<b>\$ 105.18</b>
		Balance Due:	\$ 0.00

**ARBITRATIONS AND APPEALS FROM ARBITRATIONS (PAGE 2 OF 2):**

APPEAL TO 5<sup>TH</sup> DCA OF ARBITRATION ORDER ON 2010, 2011, 2012 AND 2013 ELECTIONS:

(See Lawsuit Notebook Tab 4 for basic documentation and invoices)

Time covered: September 13, 2014 through December 9, 2014:

Fees incurred: \$4,469.00  
Credit for fees given: - 4,469.00  
Total fees billed: \$ 0.00

Costs incurred: 75.00\*  
Credit for costs given: -75.00  
Total costs billed: \$ 0.00

**Summary**

Total Incurred: \$4,544.00  
**Total Credit Given: \$4,544.00**  
Total Paid directly by Association: \$1,209.00\*  
(for mediator)  
Balance Due: \$ 0.00

BINDING ARBITRATION 2014 ELECTION:

(See Lawsuit Notebook Tab 5a for basic documentation and invoices)

Time covered: August 27, 2014 through September 30, 2014:

Fees incurred: \$ 250.00  
Credit for fees given: 0.00  
Total fees billed: \$ 250.00

Costs incurred: 0.00  
Total billed \$ 0.00

**Summary**

Total Billed: \$250.00  
Paid by Association: \$250.00  
Balance Due: \$ 0.00

APPEAL TO 5<sup>TH</sup> DCA OF ARBITRATION ORDER ON 2014 ELECTION:

(See Lawsuit Notebook Tab 5b for basic documentation and invoices)

Time covered: October 17, 2014 through November 14, 2014:

Fees incurred: \$ 0.00  
Total fees billed: \$ 0.00

Costs incurred: 0.00  
Total costs billed: \$ 0.00

**Summary**

Total Incurred: \$ 0.00  
Total Paid by Association: \$ 0.00  
Balance Due: \$ 0.00