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Freeman Mathis & Gary LLP
100 Galleria Parkway, Suite 1600
Atlanta GA 30339-5948
(770) 818-0000
Federal Tax ID: EIN 58-2288491

<http://www.fmglaw.com>

April 12, 2024

College Park Business and Industrial
Development Authority (BIDA)
Director
3667 Main St
College Park GA 30337-2614
Attention:

Client: 9619
Payer: 9619
Matter: 101121
Invoice #: 9160171674
Resp. Atty: BSG
Page No: 1

RE: Southeast Capital Land, LLC v. College Park Business and Industrial Development Authority ("BIDA") (Civil
Action File No. 2022CV366748)

Claim Number:

For Professional Services Rendered Through March 31, 2024

Total Services	\$14,067.50
Total Disbursements	<u>\$636.63</u>
Total	\$14,704.13
Current Invoice Amount	\$14,704.13
Total Outstanding Balance	\$14,704.13
Retainer Balance	\$0.00

558 4985 52 5450

Remittance Advice

Payment is due within 10 days of receipt a finance charge of 1.5% may apply if payment is not received timely.

Check Payable To:
Freeman Mathis & Gary, LLP
Attn: Accounts Receivable
100 Galleria Parkway, Suite 1600
Atlanta, Georgia 30339-5948

ACH and Wire Payments:
Receiving Bank: Synovus Bank
Receiving Bank ABA Routing Number: 061100606
Beneficiary's Name: Freeman Mathis & Gary, LLP
100 Galleria Parkway Suite 1600
Atlanta, Georgia 30339-5948
Beneficiary's Account Number: 0138438

Credit Card:
Pay Online at www.fmglaw.com
We accept VISA, MasterCard, Discover and American Express.

Matter #: 101121

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SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
03/04/2024	BSG	Review, analyze, and supplement pre-trial order; Review and analyze exhibits for inclusion in pre-trial order; review and analyze document production for supplement documents; review surveys, key documents, and determine best evidence for inclusion in trial to support arguments that BIDA did not breach contract.	9.20	\$250.00	\$2,300.00
03/04/2024	KAT	Telephone conference and multiple correspondence with City of Alpharetta Community Development Director Kathi Cook regarding affidavit.	0.50	\$225.00	\$112.50
03/05/2024	BSG	Telephone call with Michele Rothmeier re: title issue with tax lot ending in 65.	1.00	\$250.00	\$250.00
03/05/2024	BSG	Telephone conference with Katie Taylor discussing questions about breach/title issues following telephone call with Michelle Rothmeier.	0.50	\$250.00	\$125.00
03/05/2024	BSG	Telephone conference with Katie Taylor discussing motion in limine.	0.50	\$250.00	\$125.00
03/05/2024	KAT	Telephone conference and multiple correspondence with BIDA's title attorney, Michelle Rothmeier, regarding alleged title issues forming foundation of plaintiff's breach of contract claim.	0.90	\$225.00	\$202.50
03/05/2024	KAT	Telephone call and correspondence to BIDA 30(b)(6) representative Artie Jones regarding upcoming trial and being called as a witness.	0.20	\$225.00	\$45.00
03/05/2024	KAT	Correspondence with Mayor Bianca Motley Broom regarding trial and pretrial conference dates, possibility of witness subpoena, and related matters.	0.20	\$225.00	\$45.00
03/05/2024	KAT	Supplement defendant's portion of pre-trial order with detailed list of exhibits, additional names for jury qualification, and other matters.	1.70	\$225.00	\$382.50



FREEMAN MATHIS & GARY, LLP
Attorneys at Law

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Date	Attorney	Description	Hours	Rate	Total
03/05/2024	KAT	Prepare supplemental responses to plaintiff's interrogatories and requests for production to serve prior to trial and review documents to be produced for privilege and relevance.	2.40	\$225.00	\$540.00
03/06/2024	BSG	Telephone conference with Katie Taylor discussing final issues for pre-trial order.	0.50	\$250.00	\$125.00
03/06/2024	BSG	Review pretrial order edits by J. Akins.	0.50	\$250.00	\$125.00
03/06/2024	KAT	Continue review of exhibits cited by plaintiff in proposed pre-trial order and assembling defendant's exhibits for purpose of preparing for trial and completing proposed pre-trial order (approximately 1200 pages).	6.40	\$225.00	\$1,440.00
03/07/2024	BSG	Prepare for Southeast Capital Land, LLC. Attend Southeast Capital Land, LLC pre-trial conference.	1.10	\$250.00	\$275.00
03/07/2024	BSG	Telephone conference with Dan Lee discussing updates on case.	0.50	\$250.00	\$125.00
03/07/2024	KAT	Review plaintiff's objections to exhibits list and prepare summary of objections and responses to prepare to address same in pretrial conference with judge.	0.70	\$225.00	\$157.50
03/07/2024	KAT	Review and analyze court's notice of continued pre-trial conference set for March 13, 2024.	0.10	\$225.00	\$22.50
03/07/2024	KAT	Attend pre-trial conference.	0.60	\$225.00	\$135.00
03/07/2024	KAT	Telephone conference with 30(b)(6) representative Artie Jones regarding trial.	0.30	\$225.00	\$67.50
03/11/2024	BSG	Telephone conference with Katie Taylor discussing jury trial vs. bench and strategy in case.	1.10	\$250.00	\$275.00
03/12/2024	BSG	Telephone conference with Dan Lee and Katie Taylor discussing pros and cons of jury vs bench trial.	0.50	\$250.00	\$125.00
03/12/2024	KAT	Telephone conference with BIDA attorney Dan Lee regarding trial strategy.	0.40	\$225.00	\$90.00
03/12/2024	KAT	Correspondence with mayor regarding plaintiff's subpoena to her as a trial witness.	0.20	\$225.00	\$45.00
03/13/2024	BSG	Attend continued pre-trial conference hearing.	1.00	\$250.00	\$250.00
03/13/2024	BSG	Drafting correspondence to Katie Taylor regarding possible objections to the form of the denial of summary judgment. Discuss appellate issues of MSJ with Michael Freed.	0.60	\$250.00	\$150.00
03/13/2024	BSG	Telephone conference with Katie Taylor discussing trial strategy.	0.80	\$250.00	\$200.00



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03/13/2024	BSG	Review, analyze, and supplement proposed order comments. Telephone conference with Dan Lee discussing jury vs bench trial and other issues.	1.00	\$250.00	\$250.00
03/13/2024	KAT	Review and analyze plaintiff's proposed order on summary judgment and prepare list of objections to form of same to provide to staff attorney per court's instruction.	1.90	\$225.00	\$427.50
03/13/2024	KAT	Attend continued pre-trial conference.	0.90	\$225.00	\$202.50
03/13/2024	KAT	Correspondence with court staff attorney and opposing counsel regarding objections to form of plaintiff's proposed order denying defendant's motion for summary judgment.	0.20	\$225.00	\$45.00
03/13/2024	PMF	Consult on effect of court's denial of summary judgment on post-trial appeal and preserving error at trial.	0.30	\$250.00	\$75.00
03/15/2024	BSG	Review and analyze multiple emails from Artie Jones re: trial.	0.20	\$250.00	\$50.00
03/15/2024	KAT	Prepare letter correspondence to judge explaining reason for request for certificate of immediate review.	1.40	\$225.00	\$315.00
03/18/2024	KAT	Receive and review correspondence from opposing counsel to staff attorney regarding the parties' intent to proceed with bench trial.	0.10	\$225.00	\$22.50
03/18/2024	KAT	Prepare proposed certificate of immediate review certifying denial of the motion for summary judgment for immediate interlocutory review by the Georgia Court of Appeals.	0.70	\$225.00	\$157.50
03/18/2024	KAT	Continue preparation of letter to judge explaining reasons why certificate of immediate review for interlocutory appeal are merited.	1.70	\$225.00	\$382.50
03/20/2024	BSG	Prep for trial committee.	0.60	\$250.00	\$150.00
03/21/2024	BSG	Continue to prep for trial.	3.40	\$250.00	\$850.00
03/21/2024	KAT	Correspondence with Mayor Bianca Motley Broom regarding dates of bench trial and witness testimony.	0.20	\$225.00	\$45.00
03/22/2024	BSG	Review, analyze and respond to emails from John Christy, Mitchell Freehof (court) and Jonathan Adkins re: trial issues.	0.40	\$250.00	\$100.00
03/22/2024	KAT	Correspondence with mayor Bianca Motley Broom and BIDA's 30(b)(6) representative regarding upcoming trial and testimony.	0.40	\$225.00	\$90.00



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03/24/2024	BSG	Review and analyze multiple emails b/w opposing counsel/court.	0.70	\$250.00	\$175.00
03/25/2024	KAT	Review and analyze correspondence from court staff attorney and opposing counsel regarding April 2-4, 2024 bench trial.	0.20	\$225.00	\$45.00
03/25/2024	KAT	Correspondence with court reporting company regarding coverage for April 2-4, 2024 bench trial.	0.20	\$225.00	\$45.00
03/25/2024	KAT	Prepare civil subpoena to compel appearance of fact witness Ryan Pulley at bench trial on April 3, 2024.	0.40	\$225.00	\$90.00
03/26/2024	BSG	Review and analyze emails from court concerning updated trial information.	0.10	\$250.00	\$25.00
03/27/2024	KAT	Correspondence with witness Ryan Pulley and opposing counsel to inquire whether Mr. Pulley will accept service of a subpoena.	0.20	\$225.00	\$45.00
03/28/2024	KAT	Correspondence with witness Ryan Pulley regarding subpoena for appearance as sworn witness at trial and witness fee.	0.20	\$225.00	\$45.00
03/29/2024	KAT	Continue review and preparation of exhibits for trial	3.60	\$225.00	\$810.00
03/30/2024	KAT	Correspondence with opposing counsel regarding plaintiff's trial exhibits.	0.20	\$225.00	\$45.00
03/30/2024	KAT	Review and preparation of exhibits for trial on April 2, 2024	3.30	\$225.00	\$742.50
03/31/2024	KAT	Review and prepare exhibits for trial listed in pre-trial order (approximately 700 pages).	4.10	\$225.00	\$922.50
03/31/2024	KAT	Prepare list of direct and rebuttal questions for witnesses in preparation for April 2, 2024 bench trial	0.80	\$225.00	\$180.00

Total Hours : 59.80

Total Professional Services \$14,067.50

Total Professional Services Due \$14,067.50

PERSON RECAP

Person	Name	Level	Hours	Rate	Amount
BSG	Brian Goldberg	Partner	24.20	\$250.00	\$6,050.00
PMF	Michael Freed	Partner	0.30	\$250.00	\$75.00
KAT	Katie Taylor	Associate	35.30	\$225.00	\$7,942.50

DISBURSEMENT



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Date	Description	Amount
03/28/2024	Inv. Fee_9619-101121 9619-101121 Ryan Pulley, Witness fee, Southeast Capital Land, LLC v. College Park Business and Industrial Development Authority ("BIDA") (Civil Action File No. 2022CV366748).	\$25.00
03/28/2024	Inv. Fee_9619-101121 9619-101121 Ryan Pulley, Mileage, Southeast Capital Land, LLC v. College Park Business and Industrial Development Authority ("BIDA") (Civil Action File No. 2022CV366748).	\$11.25
03/29/2024	Inv. Mar_101121 9619-101121 EPIQ March Hosting Fees.	\$600.38
Total		\$636.63



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