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June 6, 2019

Eileen M. McGettigan, Esq.
City of Somerville
Office of Strategic Planning & Community Development
93 Highland Avenue
Somerville, MA 02143

Re: Purchase Order No.: [N/A – still waiting for it]
Cobble Hill Center, LLC v. Somerville Redevelopment Authority

Dear Eileen:

Enclosed please find GT Invoice #5086638 for legal services billed through May 31, 2019 regarding the Cobble Hill matter.

Please feel free to call if you have any questions.

20197601

Thank you.

Very truly yours,

James D. Masterman

JDM/ncb
Enclosure

ACTIVE 43828400v1



Invoice No.: 5086638
 File No. : 156713.010300
 Bill Date : June 6, 2019

Somerville Redevelopment Authority
 Office of Strategic Planning & Community Development
 93 Highland Avenue
 Somerville, MA 02143

Attn: Eileen M. McGettigan, Esq.

INVOICE

Re: Cobble Hill Center LLC

Legal Services through May 31, 2019:

Total Fees: \$ 67,251.50

Expenses:

Color Copies	3,056.00
Photocopy Charges	569.40
Special Clerical Services	191.67
UPS Charges	14.34
Information and Research	464.75

Total Expenses: \$ 4,296.16

Current Invoice: \$ 71,547.66

Previous Balance (see attached statement): \$ 12,750.00

Total Amount Due: \$ 84,297.66

JDM:SEP
 Tax ID: 13-3613083



Invoice No.: 5086638
File No. : 156713.010300

Account Statement

<u>Date</u>	<u>Invoice #</u>	<u>Fees Due</u>	<u>Expenses Due</u>	<u>Other Due</u>	<u>Total Due</u>
05/13/19	5069522	12,750.00	0.00	0.00	12,750.00
	Totals:	\$ 12,750.00	\$ 0.00	\$ 0.00	\$ 12,750.00

JDM:SEP

Tax ID: 13-3613083

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Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/19	James D. Masterman	Matters related to pro tanto payment	0.30	195.00
05/01/19	James P. Ponsetto	Communicated with client re pro tanto receipt and acknowledgment; reviewed and revised same; related communication with opposing counsel.	1.40	770.00
05/02/19	James D. Masterman	Review of Inner Belt URP document; FOIA request made of DHCD for records re: Inner Belt URP.	0.70	455.00
05/02/19	James P. Ponsetto	Reviewed and commented on McLaughlin, counsel for Cobble Hill, comments on pro tanto receipt; related client communication.	0.40	220.00
05/03/19	Tamara S. Case	Legal research utilizing Lexis Advance to obtain a copy of the following caselaw.	0.30	61.50
05/03/19	Stephanie T. Dugdale	Retrieve Boston Redevelopment Authority documents referenced in the Marchese v. BRA brief.	0.60	123.00
05/03/19	James D. Masterman	Preparation and drafting of Answer to Complaint; review of LDA re: Subject Property; review of caselaw and various demonstration project plans adopted by Boston BPDA; review of caselaw in connection with available defenses and preparation of Answer; internal discussion of Answer, available defenses and likely motion practice.	4.40	2,860.00
05/03/19	James P. Ponsetto	Initial drafted answer and affirmative defenses; drafted request for production.	2.60	1,430.00
05/04/19	James P. Ponsetto	Reviewed Tremont decision as support for motion for judgment on pleadings; internal discussion of shift in strategy to Rule 12(c) Motion for Judgment on Pleadings, standards, revisions to Answer.	1.60	880.00
05/06/19	Tamara S. Case	Legal research utilizing the City of Somerville website to check for access to the minutes to the meeting of the Redevelopment Authority held on February 7, 2019.	0.20	41.00
05/06/19	Tamara S. Case	Legal research utilizing Mass Courts, Social Law Library, Lexis Advance, and Beacon Hill Research to request filings related to the 2002 motion for summary judgment in the Suffolk Superior case Tremont on Common Condominium Trust v Boston Redevelopment Authority.	0.60	123.00
05/06/19	James D. Masterman	Review of Rules and caselaw re: entitlement to judgment on pleadings; redraft of Answer to Complaint in light of revised strategy to seek Judgment on the Pleadings; internal discussion of reliance on administrative record and necessary documents to be made of part of administrative record; initial assembly of same.	6.40	4,160.00
05/06/19	James P. Ponsetto	Reviewed City's Demonstration Project Plan and appendices and minutes of the SRA and Council in preparation for assembling and filing Administrative Record.	4.90	2,695.00

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05/07/19	Tamara S. Case	Legal research utilizing the City of Somerville's website to obtain a copy of the Demonstration Project Plan and to identify the 8 Appendixes.	0.50	102.50
05/07/19	Tamara S. Case	Legal research utilizing Beacon Hill Research to obtain a copy of the motion for partial summary and related documents in the Suffolk Superior case Tremont on the Common v Boston Redevelopment Authority.	0.20	41.00
05/07/19	Tamara S. Case	Legal research utilizing Mass Courts, Social Law Library, and Beacon Hill Research to obtain copies of the filings related to the plaintiff's motion for judgment on the pleadings and the BRA's response in the case Marchese v Boston Redevelopment Authority.	0.50	102.50
05/07/19	James D. Masterman	Preparation of Memo in support of Motion on Pleadings	7.30	4,745.00
05/08/19	James D. Masterman	Preparation of Memo in support of Motion on Pleadings	9.20	5,980.00
05/09/19	Tamara S. Case	Legal research utilizing Internet resources to locate the final version from 2015 of the Inner Belt Brickbottom Plan for Somerville and to check for access to the Appendices.	0.60	123.00
05/09/19	James D. Masterman	Attend to matters related to and preparation of Memo in Support of Motion for Judgment on Pleadings.	8.70	5,655.00
05/09/19	James P. Ponsetto	Attention to drafting related to answer, administrative record and proposed motion for JOP; reviewed final InnerBelt Neighborhood Plan uploaded by client, documents related to Mullins v. Corcoran, et al., litigation, corrected SRA minutes.	2.70	1,485.00
05/10/19	Michael A. Ambrose	Research and analysis for cases from memorandum for James Ponsetto on Westlaw	0.30	52.50
05/10/19	James D. Masterman	Preparation of motion for judgment on pleadings, supporting memo, administrative record.	5.80	3,770.00
05/10/19	James P. Ponsetto	Conferenced with Mr. Masterman re SRA Answer and related motion for judgment on pleadings (.4); attention to review of documents constituting administrative record and drafting of revised index for same (3.3); reviewed and edited memo of law supporting motion for JOP (1.9); drafted motion and request for hearing (.3); call with MR. Galligani with the City re demonstration plan (.1).	6.00	3,300.00
05/11/19	James P. Ponsetto	Attention to drafting motion for judgment on pleadings, supporting memo, administrative record index and Answer.	4.60	2,530.00
05/12/19	James D. Masterman	Further review and revisions to Motion for Judgment on the Pleadings and supporting memo; forward to client.	2.60	1,690.00
05/13/19	Adam M. Masarek	Citation-checking brief by request of James Ponsetto	0.30	61.50
05/13/19	James D. Masterman	Final revisions to pleadings and related documents.	5.30	3,445.00

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05/13/19	James P. Ponsetto	Attention to edits to Answer, Administrative Record, and motion papers including review of record and case cites.	4.20	2,310.00
05/14/19	James D. Masterman	Final review, revision and assemblage for filing of Answer and Administrative Record; service on Cobble Hill of Answer, Motion for Judgment on Pleadings and Memo in support.	4.40	2,860.00
05/14/19	James P. Ponsetto	Attention to final edits to Memo in support of Motion for Judgment on Pleadings and Administrative Record, and assembly of contents.	2.40	1,320.00
05/14/19	Kerry A. Stehn	Review appendixes for court filing; review index; and communications with attorneys re: same.	4.20	1,575.00
05/20/19	James D. Masterman	Internal discussion of likely Opposition filings and preparation for same.	0.80	520.00
05/20/19	James P. Ponsetto	Reviewed S. Ct. 20 and related MRCP 16 and internal discussion of case management schedule.	0.30	165.00
05/22/19	James D. Masterman	Internal discussion of likely opposition and strategy on reply preparation, other issues.	0.40	260.00
05/28/19	James D. Masterman	Discussion of matter with S Foster; internal discussion and discussion with E McGettigan of anticipated time of Opposition to Motion for Judgment on the Pleadings and right of filing Reply to Opposition.	0.80	520.00
05/29/19	James D. Masterman	Initial receipt and review of Opposition; internal discussion and same with E McGettigan; review of rule re: Reply and Opposition; receipt and review of proposal for appraisal services from S Foster and forward to E McGettigan for approval.	1.80	1,170.00
05/29/19	James P. Ponsetto	Reviewed Cobble Hill's opposition to motion for judgment on pleadings.	0.90	495.00
05/30/19	James D. Masterman	Attend to issues related to Opposition and preparation of Reply; research of caselaw re: adjudicatory hearing, reliance on hearsay as part of agency decisions, internal discussion of framework of Reply and Opposition to Cross-Motion.	5.30	3,445.00
05/30/19	James P. Ponsetto	Conferenced with Mr. Masterman re reply/opposition in support of motion for judgment on pleadings (demonstration project); drafted reply/opposition and related research.	5.90	3,245.00
05/31/19	James D. Masterman	Internal discussion of Reply and Opposition arguments.	0.70	455.00
05/31/19	James P. Ponsetto	Attention to drafting reply and opposition in support of motion for judgment on the pleadings and related research; email to client re SRA meetings.	3.30	1,815.00

Total Time: 114.40
Total Fees: \$ 67,251.50

