



Invoice No.: 1000337508
File No. : 156713.010500
Bill Date : June 9, 2023

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

Attn: Catherine Lester Salchert, Esq.

INVOICE

Re: Motion for New Trial - Cobble Hill v. SRA

Legal Services through May 31, 2023:

Total Fees:	\$	48,545.00
Current Invoice:	\$	<u>48,545.00</u>

JDM:SEP
Tax ID: 13-3613083



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Note: Payment is Due 30 Days from Date of Invoice

***FOR YOUR CONVENIENCE,
PAYMENT INSTRUCTIONS FOR GT FIRM ACCOUNT
FOR FEES & COSTS ARE AS FOLLOWS:***

For Wire Instructions:

Bank: WELLS FARGO BANK
ABA #: 121000248

For ACH Instructions:

Bank: WELLS FARGO BANK
ABA#: 063107513

CREDIT TO: GREENBERG TRAURIG DEPOSITORY ACCOUNT
ACCOUNT #: 2000014648663

PLEASE

**REFERENCE: CLIENT NAME: SOMERVILLE REDEVELOPMENT
AUTHORITY
FILE NUMBER: 156713.010500
INVOICE NUMBER: 1000337508*
BILLING
PROFESSIONAL: James D. Masterman**

IF YOU WISH TO PAY BY CHECK PLEASE REMIT TO THE ADDRESS BELOW:

**Greenberg Traurig
PO Box 936769
ATLANTA GA 31193-6769**

Wire fees may be assessed by your bank.

*** If paying more than one invoice, please reference all invoice numbers in wiring instructions.**
Please contact acct-cashreceipts@gtlaw.com for any payment related questions.

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Tax ID: 13-3613083

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/15/23	Gary R. Greenberg	Re Cobble Hill; work re motion for new trial, related legal and factual research in support of request	0.80	520.00
05/16/23	Diana A. Balluku	Review and analysis of Massachusetts state case law as to ascertain whether the SRA can bring a motion for a new trial based on the improper statements from Cobble Hill's counsel made during his closing statement to the jury.	2.60	1,170.00
05/16/23	Mark A. Berthiaume	Attention to motion for new trial including issue identification and legal research review.	3.50	2,275.00
05/16/23	Gary R. Greenberg	Re proposed motion for new trial; analysis of information including statements by plaintiff's counsel, case law, and key points to asset in post trial motion for new trail based on p[plaintiff's improper statements in closing	1.40	910.00
05/17/23	Diana A. Balluku	Further review and analysis of Massachusetts state case law as to ascertain whether the SRA can bring a motion for a new trial based on the improper statements from Cobble Hill's counsel made during his closing statement to the jury (3.3); drafted summary and analysis of Massachusetts case law favorable to SRA's position on a motion for a new trial (1.1).	2.40	1,080.00
05/17/23	Mark A. Berthiaume	Review case law re: Rule 59 motions based on closing argument; review audio files of court proceedings.	3.70	2,405.00
05/17/23	Gary R. Greenberg	Re Cobble Hill; case work re post trial motion and analysis as basis for potential for new trail based on plaintiff's improper statements during closing; review and analyze cases; review and analyze audio of closing and Judge's comments; conference with legal team re thoughts and analysis	2.30	1,495.00
05/18/23	Diana A. Balluku	Review and analysis of Massachusetts case law as to identify additional authority in support of a motion for a new trial.	2.60	1,170.00
05/18/23	Mark A. Berthiaume	Conference with C. Amara and C. Salchert re: motion for new trial; attention to outline of motion for new trial.	2.50	1,625.00
05/18/23	Gary R. Greenberg	Re Cobble Hill: case work including proposed post trial motion for new trial: case work including work on post trial motion for new trial related analysis and research and conference with legal team	2.60	1,690.00
05/19/23	Diana A. Balluku	Further review and analysis of Massachusetts state and federal case law as to identify instances wherein a curative instruction to the jury has been deemed insufficient to correct any prejudice.	2.20	990.00

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05/19/23	Mark A. Berthiaume	Attention to motion for new trial; internal communications re: preparation of same; review results of additional legal research.	2.50	1,625.00
05/19/23	Gary R. Greenberg	Re motion for new trial; case work including work on motion for new trial; analysis and confer over arguments to advance; related research; emails	1.30	845.00
05/20/23	James P. Ponsetto	Drafted memorandum in support of the new trial motion, with related research regarding inflammatory closing arguments.	3.80	2,280.00
05/21/23	Gary R. Greenberg	Re Cobble Hill motion for new trial: case work including analyze cases re new trial motion; emails re analysis and several with legal team re arguments in proposed motion and analysis	1.10	715.00
05/21/23	James P. Ponsetto	Drafted memorandum in support of the new trial motion.	4.60	2,760.00
05/22/23	Diana A. Balluku	Further review and analysis of Massachusetts state and federal case law as to identify authority supporting proposition that curative instructions are not sufficient to cure the prejudice in support of motion for a new trial.	2.80	1,260.00
05/22/23	Mark A. Berthiaume	Review additional case law; attention to audio of court proceedings; review draft motion; conference with A. Holdway re: motion.	2.70	1,755.00
05/22/23	Gary R. Greenberg	Re Cobble Hill; motion for new trial; case work including research, analysis re preparation of motion for new trial and key arguments; conference with legal team re analysis	1.90	1,235.00
05/22/23	Alison T. Holdway	Call with M. Berthiaume regarding revising memo of law in support of motion for new trial; review draft memo; review recordings of voir dire and closing argument; research rules and case law concerning moving for new trial; draft revisions to memo of law supporting new trial motion	4.10	2,050.00
05/22/23	James P. Ponsetto	Revised and circulated internally draft memorandum in support of new trial.	3.30	1,980.00
05/23/23	Diana A. Balluku	Further review and analysis of Massachusetts state and federal case law as to identify authority supporting proposition that curative instructions are not sufficient to cure the prejudice in support of motion for a new trial (0.8); drafted summary and analysis of Massachusetts state and federal authority identified in support of proposition that curative instructions are not sufficient to cure the prejudice (0.4).	1.10	495.00
05/23/23	Mark A. Berthiaume	Review prepared transcripts; communications with client; attention to motion for new trial.	2.70	1,755.00
05/23/23	Alison T. Holdway	Continue researching rules and case law concerning moving for new trial; continue drafting revisions to memo of law supporting new trial motion; exchange emails and calls with M. Berthiaume regarding same	5.80	2,900.00
05/23/23	Matthew D. McGuire	Analyze transcripts from trial in regards to voir dire of jury and potential issues to address in	0.40	166.00

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		Motion for New Trial.		
05/23/23	James P. Ponsetto	Attention to matters relating to new trial motion, including review of May 2 and May 12 trial transcripts; reviewed juror voir dire and related peremptory challenges.	2.90	1,740.00
05/24/23	Mark A. Berthiaume	Review and editing of motion for new trial; communication with client re: same; communication to client with draft memo in support of motion for new trial.	3.60	2,340.00
05/24/23	Gary R. Greenberg	Re Cobble Hill Motion for new trial;' case work including work on preparation, review and comments to draft motion and memo in support of motion for new trial; conferences among legal team; emails	2.20	1,430.00
05/24/23	Alison T. Holdway	Continue drafting motion for new trial; research relevant case law; exchange emails with M. Berthiaume and G. Greenberg regarding motion for new trial; discuss strategy concerning same with M. Berthiaume and G. Greenberg; revise motion for new trial; prepare exhibits to motion for new trial	4.30	2,150.00
05/24/23	James P. Ponsetto	Reviewed and commented on draft memorandum in support of new trial motion; reviewed May 2 audio record re: voir dire and challenges to jurors.	2.30	1,380.00
05/25/23	Mark A. Berthiaume	Communications re: motion for new trial and potential settlement offer; attention to finalization of 9A package and notice of motion.	1.40	910.00
05/25/23	Alison T. Holdway	Draft notice of appearance for M. Berthiaume; draft notice of motion for new trial; draft motion for new trial; revise and finalize memo of law supporting motion for new trial; coordinate filing and service of motion for new trial papers with M. Berthiaume and M. McGuire	2.00	1,000.00
05/25/23	James D. Masterman	Rule 9C conference.	0.30	195.00
05/25/23	Matthew D. McGuire	Attention to issues regarding service by mail and electronically of Notice of Appearance of M. Berthiaume, Motion for New Trial, Memorandum in Support of Motion for New Trial, Exhibits in Support of Motion for New Trial and Superior Court Rule 9E Notice of Filing Motion for New Trial.	0.60	249.00

<u>Total Time:</u>	84.30	
<u>Total Fees:</u>		\$ 48,545.00