

EXHIBIT B

NOT A CERTIFIED COPY



# BETH COKE

EMPLOYMENT LAW

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Fort Pierce, Florida 34950  
(772) 252-4230

## Coke Employment Law

Issue Date	1/30/2024
	20231010 - Cheney Bros., Inc.
Email	Wes300ZX@gmail.com

### Bill To:

Richards, Wesley  
1001 SW Charcoal Ave  
Port St. Lucie, FL 34953

### Time Entries

Time Entries		Rate	Hours	Sub
2/8/2023 Review documents from client in preparation for meeting with client. Meeting with client to discuss background facts and how to proceed.	Coke, Beth	\$395.00	2.10	\$829.50
2/22/2023 Review/analyze the Standing Order for Case Management and Complaint. Research elements for Fraud in the Inducement; Fraudulent misrepresentation; quantum meruit; and unjust enrichment.	Coke, Beth	\$395.00	2.90	\$1,145.50
2/24/2023 Review/analyze client's outline of key points for lawsuit	Coke, Beth	\$395.00	0.75	\$296.25
3/3/2023 Review additional information from client. Draft Motion to Dismiss.	Coke, Beth	\$395.00	1.70	\$671.50
3/8/2023 Telephone conference with client re Motion to Dismiss. Revise/finalize & file.	Coke, Beth	\$395.00	0.80	\$316.00

Time Entries		Rate	Hours	Sub
3/9/2023 Review email from O/C re dates for my client's deposition and scheduling hearing on motion to dismiss. Confer with client re same and how to proceed.	Coke, Beth	\$395.00	0.25	\$98.75
3/10/2023 Review Notice of Production from Non-Party, First Interrogatories to Defendant and Request for Production to Defendant. Outline information/documents needed from client for response	Coke, Beth	\$395.00	1.50	\$592.50
3/13/2023 Correspond with O/C re setting Motion to Dismiss for hearing and Defendant's position that it is inappropriate to respond to discovery or take Defendant's Deposition until the MTD is ruled on.	Coke, Beth	\$395.00	0.20	\$79.00
3/20/2023 Prepare Motion to Stay Discovery pending ruling on MTD.	Coke, Beth	\$395.00	0.75	\$296.25
3/21/2023 Correspond with client about the subpoena to Presidential Aviation and whether to file an objection. Review request for dates for hearing on MTD from office of opposing counsel and respond.	Coke, Beth	\$395.00	0.40	\$158.00
4/11/2023 Review Plaintiff's Motion to Compel Discovery. Confer with client re same.	Coke, Beth	\$395.00	0.40	\$158.00
5/18/2023 Hearing on Plaintiff's Motion to Compel and Defendant's Motion to Special Set Hearing. Prepare for and argue Defendant's Motion to Dismiss. Update client re same.	Coke, Beth	\$395.00	4.70	\$1,856.50
5/22/2023 Begin drafting responses to discovery.	Coke, Beth	\$395.00	1.50	\$592.50
5/25/2023 Telephone conference with client regarding responses to Interrogatories and documents needed to respond to RFP. Continue preparing discovery responses. Review/analyze documents provided by client.	Coke, Beth	\$395.00	2.70	\$1,066.50
5/26/2023 Finish draft of discovery responses for client review. Review email regarding one correction. Revise per client's email.	Coke, Beth	\$395.00	0.75	\$296.25
5/30/2023 Finalize discovery responses and serve. Review email from opposing counsel regarding good faith attempt to resolve objections raised.	Coke, Beth	\$395.00	0.50	\$197.50
5/31/2023 Review Second Interrogatories and 2nd Request for Production of Documents to Defendant. Conference with client re same.	Coke, Beth	\$395.00	0.75	\$296.25
6/1/2023 Review/Analyze Plaintiff's Amended Complaint. Telephone Conference with client re same and filing Motion to Dismiss Amended Complaint..	Coke, Beth	\$395.00	0.70	\$276.50
6/2/2023 Review Motion to Compel better responses to first set of discovery requests.	Coke, Beth	\$395.00	0.40	\$158.00
6/6/2023 Correspond with office of O/C re scheduling hearing on Motion to Compel Deposition and Better Discovery responses. Review Ntc of Hearing.	Coke, Beth	\$395.00	0.10	\$39.50
6/9/2023 Drafting Motion to Dismiss Plaintiff's Amended Complaint.	Coke, Beth	\$395.00	1.20	\$474.00
6/12/2023 Revise/Finalize and File MTD amended COmplaint.	Coke, Beth	\$395.00	0.50	\$197.50

Time Entries		Rate	Hours	Sub
6/22/2023 Confer with client about supplementing discovery responses based on motion to compel and proceeding with deposition.	Coke, Beth	\$395.00	0.90	\$355.50
6/23/2023 Correspond with O/C re dates for deposition and supplemental discovery responses. Schedule phone call with O/C to discuss same.	Coke, Beth	\$395.00	0.20	\$79.00
6/27/2023 Telephone conference with opposing counsel to discuss possible resolution of discovery disputes. Follow up with client re same. Review additional documents provided by client.	Coke, Beth	\$395.00	1.20	\$474.00
6/28/2023 Review/analyze additional documents provided by client. Send supplemental documents to O/C. Correspond re same.	Coke, Beth	\$395.00	0.80	\$316.00
7/5/2023 Preparing responses to second set of discovery. Correspond with client re same.	Coke, Beth	\$395.00	1.30	\$513.50
7/7/2023 Continue preparing response to second discovery requests. Correspond with client re same. Revise and serve second discovery responses.	Coke, Beth	\$395.00	2.10	\$829.50
7/11/2023 Draft Unopposed Motion to Special Set Hearing on MTD	Coke, Beth	\$395.00	0.30	\$118.50
7/17/2023 Meet with client to prepare for deposition.	Coke, Beth	\$395.00	2.00	\$790.00
7/18/2023 Prepare for and represent client at deposition (includes 2 hours drive time)	Coke, Beth	\$395.00	5.50	\$2,172.50
12/12/2023 Prepare for and attend hearing on Motion to Dismiss Amended Complaint. Telephone conference with client to update regarding same and next steps.	Coke, Beth	\$395.00	1.25	\$493.75
1/15/2024 Review Notice of Voluntary Dismissal. Confer with client re same.	Coke, Beth	\$395.00	0.25	\$98.75
1/24/2024 Send email to opposing counsel regarding whether issue of fees can be resolved without filing motion with the court. Review response and reply	Coke, Beth	\$395.00	0.50	\$197.50
1/26/2024 Send follow up email to O/C re whether there will a response to the offer to resolve the issue of attorney's fees without filing a motion.	Coke, Beth	\$395.00	0.10	\$39.50
1/29/2024 Review email response from O/C regarding not responding to request for fees and seeking their fees for defending motion for fees.	Coke, Beth	\$395.00	0.10	\$39.50
1/30/2024 Research various issues, including the standard for awarding attorney's fees under Fla. Stat. 57.105, the affect of voluntary dismissal on motion for attorney's fees under Fla. Stat. 57.105, showing reasonableness of hours and rate. Drafting Motion for fees.	Coke, Beth	\$395.00	2.50	\$987.50

Total (USD)

\$17,597.25