

**Serpe Andrews PLLC
Time and Expense Details**

Report ID: OT2025 - 39690
Thursday, March 23, 2023

Client	Client Reporting Name	Matter	Matter Reporting Name	Billing Timekeeper
HCA	Health Care Indemnity, Inc	21238	Burke, Mark v. Kingwood	Andrews, Nicole

Date	Timekeeper	Hours Worked	Hours to Bill	Rate	Amount	Task Code	Activity Code	Narrative
								Receive and review new assignment with attention to information provided by carrier and risk manager related to video footage taken by the patient/claimant, website generated that provides negative publicity and rendition of events related to his care at the facility, the various MDs involved [REDACTED] references related to other physicians who cared for him [REDACTED] [REDACTED] Conference call with [REDACTED] [REDACTED] to secure more information regarding; [REDACTED] [REDACTED] [REDACTED] Receive and review additional information from [REDACTED] Prepare email to [REDACTED] letting her know of my communication with [REDACTED] as well as alerting them of [REDACTED] [REDACTED]
9/6/2022	NGA	2.5	2.5	\$310.00	\$775.00	L120	A104	[REDACTED]
								Attention to research accomplished per client's request, case law and overall approach moving forward on that particular issue, several communications with [REDACTED] regarding information learned as it relates to Mr. Burke, his complaints, medical condition, communication with physicians and hospital administration, the physician that he claims was an imposter [REDACTED]
9/7/2022	NGA	1.4	1.4	\$310.00	\$434.00	L120	A104	[REDACTED]
9/7/2022	GLD	0.9	0.9	\$130.00	\$117.00	L110	A104	Review and detailed analysis of medical records pertaining to Mark Burke from HCA Houston Healthcare Kingwood to determine completeness in preparation for production.
9/7/2022	GLD	0.4	0.4	\$130.00	\$52.00	L110	A104	Receipt and review of medical records of Mark Burke from HCA Houston Healthcare Kingwood. Review and edit communication to carrier providing [REDACTED] [REDACTED]
9/8/2022	NGA	0.8	0.8	\$310.00	\$248.00	L120	A104	[REDACTED]
9/12/2022	MJA	0.4	0.4	\$200.00	\$80.00	L110	A104	Analyze patient fact sheet, letter from client, and client's website that alleges impersonation of physicians at Kingwood Hospital in initial review of the matter for the purpose of fact investigation
9/12/2022	MJA	0.4	0.4	\$200.00	\$80.00	L110	A104	Review phone logs and video stills of Plaintiff's hospital stay to confirm whether Plaintiff's allegations are substantiated [REDACTED]
9/12/2022	MJA	1.2	1.2	\$200.00	\$240.00	L120	A104	Review case law and statutes involving [REDACTED] [REDACTED] [REDACTED]
9/14/2022	GLD	0.8	0.8	\$130.00	\$104.00	L110	A104	Review and analysis of medical records pertaining to Mark Burke from HCA Houston Healthcare Kingwood with preparation of information for attorney review for the Initial Case Conference
9/14/2022	GLD	0.8	0.8	\$130.00	\$104.00	L110	A104	Review of file materials and correspondence for determination of potential allegations and for status of medical records, billing records, payments/adjustment information, and radiographs for upcoming preparation of medical summary. Review and analysis of medical records from HCA Houston Healthcare Kingwood pertaining to Mark Burke with simultaneous preparation of detailed medical summary with specific focus on nursing notes in regards to communication with nurses and physicians [REDACTED]
9/15/2022	GLD	2.2	2.2	\$130.00	\$286.00	L110	A104	Review and analysis of medical records from HCA Houston Healthcare Kingwood pertaining to Mark Burke with simultaneous preparation of detailed medical summary with specific focus on physician progress notes in regards to dates, times of treating provider notes [REDACTED]
9/15/2022	GLD	3.4	3.4	\$130.00	\$442.00	L110	A104	Analyze medical summary for liabilities and prepare initial case conference to include an analysis of Mr. Burke's meritless claims and plan of action [REDACTED]
9/21/2022	MJA	4	4	\$200.00	\$800.00	L120	A103	[REDACTED]
9/26/2022	GLD	0.4	0.4	\$130.00	\$52.00	L110	A104	Receipt and review of radiology imaging of Mark Burke from HCA Houston Healthcare Kingwood. Receive and review letter from claimant detailing allegations against facility related to visits by his parents and asking for video footage, etc to be secured. Prepare response to carrier and risk [REDACTED] [REDACTED]
9/28/2022	NGA	0.7	0.7	\$310.00	\$217.00	L120	A104	[REDACTED]

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Date	Timekeeper	Hours Worked	Hours to Bill	Rate	Amount	Task Code	Activity Code	Narrative
10/3/2022	NGA	1.4	1.4	\$310.00	\$434.00	L140	A103	Review and edit ICC with attention to claims made by pro se claimant allegations, website noting video footage of hospital care, police involvement and overall recommended plan as well as review of recent communication from Mr. Burke regarding his parent's death, as well as responses to letter from hospital addressing his grievances.
10/14/2022	MJA	0.6	0.6	\$205.00	\$123.00	L120	A103	Review response to Claimant's Spoilation letter and revise necessary portions to indicate we have already sufficiently evaluated his concerns and reviewed his medical records, which showed his treatment was appropriate and within clinical standards.
10/19/2022	NGA	1	1	\$310.00	\$310.00	L210	A104	Receive and review lengthy petition filed by pro se plaintiff raising various allegations against facility, physicians involved, as well as discovery served. Prepare communication to carrier and hospital representative regarding [REDACTED]
10/19/2022	NGA	0.3	0.3	\$310.00	\$93.00	L210	A104	[REDACTED], as well as our approach/analysis on [REDACTED]. Prepare email to [REDACTED] and [REDACTED] regarding [REDACTED].
10/19/2022	MJA	0.2	0.2	\$205.00	\$41.00	L110	A106	[REDACTED]
10/19/2022	MJA	0.5	0.5	\$205.00	\$102.50	L110	A104	Analyze Harris County District Court's website to find cases filed by "Mark Burke" in determining whether he has filed other lawsuits in the past.
10/19/2022	MJA	1.2	1.2	\$205.00	\$246.00	L110	A104	Review Plaintiff's Petition, setting forth a lengthy description of events and claims of negligence and stalking by HCA Kingwood, as well as draft summary. Attention to latest postings by pro se plaintiff [REDACTED].
10/21/2022	NGA	0.5	0.5	\$310.00	\$155.00	L120	A104	[REDACTED]
10/21/2022	NGA	0.5	0.5	\$310.00	\$155.00	L120	A104	update carrier regarding [REDACTED].
10/25/2022	MJA	1.9	1.9	\$205.00	\$389.50	L120	A104	Evaluate Plaintiff's cited case law and statutes in his petition to determine their applicability and merit to Plaintiff's allegations.
11/2/2022	NGA	0.1	0.1	\$310.00	\$31.00	L120	A104	Attention to service being perfected and calendaring answer.
11/9/2022	MJA	2.8	2.8	\$200.00	\$560.00	L120	A103	Prepare Initial Investigation and Evaluation Report, including medical records narrative, judge and venue analysis (focusing on the 234th Judicial District in Harris County), and potential experts.
11/10/2022	CK	0.5	0.5	\$310.00	\$155.00	L210	A104	Begin reviewing Plaintiff's original petition [REDACTED].
11/10/2022	MJA	1.4	1.4	\$200.00	\$280.00	L120	A104	Examine Plaintiff's allegation of medical negligence in his Petition, including cited cases and statutes, as well as alleged facts, to determine whether to raise a defense or specially except to Plaintiff's allegation that a nurse should have prescribed Mr. Burke pain medication, without consulting the treating physician. [REDACTED]
11/10/2022	MJA	1.8	1.8	\$200.00	\$360.00	L120	A104	[REDACTED]
11/11/2022	MJA	1.5	1.5	\$200.00	\$300.00	L120	A104	Examine Plaintiff's allegation of gross negligence in his Petition, including cited cases and statutes, as well as alleged facts, to determine whether to raise a defense or specially except to Plaintiff's allegations that HCA Kingwood's nurses refused the Plaintiff medical attention.
11/11/2022	MJA	1.6	1.6	\$200.00	\$320.00	L120	A104	Examine Plaintiff's allegation of corporate negligence in his Petition, including cited cases and statutes, as well as alleged facts, to determine whether to raise a defense or specially except to Plaintiff's allegations that HCA Kingwood is withholding information about the 'Imposter Doctor' [REDACTED].
11/14/2022	MJA	1.8	1.8	\$200.00	\$360.00	L120	A103	Prepare Initial Investigation and Evaluation Report, including a description of pro se Plaintiff and counsel for Defendant, as well as parties and key fact witnesses, including Plaintiff's treating physicians and the nursing staff during his admission at HCA Kingwood.
11/15/2022	MJA	3.2	3.2	\$200.00	\$640.00	L120	A103	Prepare Initial Investigation and Evaluation Report including the executive summary, which defines the numerous allegations against HCA Kingwood from Plaintiff's gripe website and petition, the liability analysis that focuses on Plaintiff's unsubstantiated claims, and damages model.

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11/16/2022	NGA	0.9	0.9	\$310.00	\$279.00	L120	A104	Review of legal memo prepared addressing all the allegations pled in plaintiff's petition, case law [REDACTED] [REDACTED] [REDACTED] [REDACTED] Prepare answer [REDACTED] [REDACTED]
11/17/2022	NGA	0.8	0.8	\$310.00	\$248.00	L210	A103	Prepare correspondence to [REDACTED] regarding [REDACTED] [REDACTED]
11/17/2022	MJA	0.7	0.7	\$200.00	\$140.00	L120	A106	Revise Defendant's Answer prior to filing, asserting a general denial to all claims
11/17/2022	MJA	0.6	0.6	\$200.00	\$120.00	L210	A103	Prepare Initial Investigation and Evaluation Report, including an evaluation of the jury verdict range, settlement value and resolution strategy, plan of action moving forward, and an analysis of market concerns and public relations by focusing on Plaintiff's targeting of HCA Kingwood and its retained counsel on his website.
11/17/2022	MJA	1.9	1.9	\$200.00	\$380.00	L120	A103	Receive and review of plaintiff filing mt for sanctions against hospital claiming that he hospital counsel failed to accept service delaying the case and seeking sanctions and disqualifying our firm.
11/22/2022	NGA	0.8	0.8	\$310.00	\$248.00	L120	A104	Review Plaintiff's Motion for Sanctions against HCA Kingwood's counsel stating unsubstantiated claims of conspiracy to withhold video footage from Plaintiff and failing to timely respond to Plaintiff's requests, as well as begin preparing a response to such claims
11/22/2022	MJA	0.8	0.8	\$200.00	\$160.00	L120	A104	Receipt and review of plaintiff's response to RFD with attention to allegations pled, witnesses listed and documents provided
11/23/2022	NGA	0.7	0.7	\$310.00	\$217.00	L120	A104	Prepare Initial Investigation and Evaluation Report including the theme, strengths, and weaknesses of the case section [REDACTED] [REDACTED] [REDACTED]
11/27/2022	MJA	0.7	0.7	\$200.00	\$140.00	L120	A103	Evaluate [REDACTED] background information of Plaintiff, [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11/28/2022	MJA	2.2	2.2	\$200.00	\$440.00	L110	A104	Prepare email to [REDACTED] including Plaintiff's background information [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
11/28/2022	MJA	0.7	0.7	\$200.00	\$140.00	L110	A106	Receive and review Plaintiff's Objections and Request for Relief Related to Defendant's Boilerplate and Unconstitutional Violation of Rule 193.7 and 14 attachments, asserting improper answers filed by Serpe Andrews attorneys across various HCA matters, and evaluate [REDACTED]
12/9/2022	MJA	0.6	0.6	\$205.00	\$123.00	L210	A104	Draft summary of requirements for production of medical records prior to receipt of authorization under Ch 74 for use in drafting discovery responses and objections to Plaintiff's first requests for production.
12/14/2022	BEH	0.6	0.6	\$205.00	\$123.00	L120	A103	Preparation of medical records, billing records and radiology imaging of Marke Burke from HCA Houston Healthcare Kingwood in preparation of Production. Electronic communication to and from the Risk Manager of HCA Houston Healthcare Kingwood [REDACTED]
12/15/2022	GLD	0.4	0.4	\$140.00	\$56.00	L110	A104	Review and analysis of pleadings, discovery, healthcare providers listed on authorization and medical records pertaining to Mark Burke from HCA Houston Healthcare Kingwood with preparation of Ex A (healthcare provider and fact witness list) for Defendant's Initial Disclosures with identification of various providers regarding same and location of contact information for various providers regarding same.
12/15/2022	GLD	0.3	0.3	\$140.00	\$42.00	L110	A106	Review and analysis of pleadings, discovery, healthcare providers listed on authorization and medical records pertaining to Mark Burke from HCA Houston Healthcare Kingwood with preparation of Ex A (healthcare provider and fact witness list) for Defendant's Initial Disclosures with identification of various providers regarding same and location of contact information for various providers regarding same.
12/15/2022	GLD	3.7	3.7	\$140.00	\$518.00	L110	A104	Prepare Defendant HCA Houston Healthcare Kingwood's Objection and Response to Plaintiff's Request for Production and Inspection of Video Surveillance Footage due to Plaintiff's failure to produce a compliant expert report, per Texas Civil Practice and Remedies Code Section 74.351(s).
12/15/2022	MJA	0.8	0.8	\$205.00	\$164.00	L310	A103	Prepare Defendant HCA Houston Healthcare Kingwood's Objection and Response to Plaintiff's Request for Production and Inspection of Video Surveillance Footage due to Plaintiff's failure to produce a compliant expert report, per Texas Civil Practice and Remedies Code Section 74.351(s).

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12/15/2022	MJA	1.2	1.2	\$205.00	\$246.00	L350	A103	Prepare Initial Disclosures and Exhibit A for the purpose of disclosing relevant and necessary information to Plaintiff in compliance with Texas Rule of Civil Procedure 194. Review whether [REDACTED] [REDACTED] [REDACTED] [REDACTED]
12/15/2022	MJA	1.1	1.1	\$205.00	\$225.50	L120	A104	[REDACTED] Review and edit IIER with attention to [REDACTED] [REDACTED] [REDACTED]
12/17/2022	NGA	1.4	1.4	\$310.00	\$434.00	L120	A103	[REDACTED] Review and edit Request for Production and Request for Discovery with attention to [REDACTED] [REDACTED]
12/19/2022	NGA	0.5	0.5	\$310.00	\$155.00	L310	A104	[REDACTED] Review of file material and Authorization for Release of Medical Records of Mark Burke in preparation of Initial Disclosures.
12/19/2022	GLD	0.4	0.4	\$140.00	\$56.00	L110	A104	Evaluate Defendant's Initial Disclosures and Defendant's Objection and Response to Plaintiff's Request for Production and Inspection of Video Surveillance Footage during final review prior to serving Plaintiff, [REDACTED] [REDACTED]
12/19/2022	MJA	0.8	0.8	\$205.00	\$164.00	L350	A104	[REDACTED] Review of medical records and file materials in preparation of completion of Initial Investigation and Evaluation Report for attorney.
12/22/2022	GLD	0.8	0.8	\$140.00	\$112.00	L110	A104	Receive and review of lengthy email from pro se plaintiff asking us to substantiate our legal position and seeking of information that is not within his purview [REDACTED] [REDACTED]
12/26/2022	NGA	0.8	0.8	\$310.00	\$248.00	L120	A104	[REDACTED] Prepare response to Mr. Burke's email asking if we have complied with Request for Discovery.
12/27/2022	NGA	0.2	0.2	\$310.00	\$62.00	L120	A108	Receive and review of plaintiff Motion to Compel request for disclosure and attachments seeking court to order us to produce documents prior to him meeting Ch. 74 requirements [REDACTED]
12/27/2022	NGA	0.9	0.9	\$310.00	\$279.00	L120	A104	Receive and review of another motion filed by pro se plaintiff seeking sanctions and requesting court to remove us as counsel of record [REDACTED] [REDACTED] Prepare and send email correspondence to Plaintiff putting him on notice that he failed to download Defendant HCA Kingwood's timely e-served Initial Disclosures and Objection to Plaintiff's Request for Production on December 19, 2022, in light of Plaintiff's Motion to Compel.
12/27/2022	MJA	0.4	0.4	\$205.00	\$82.00	L390	A108	Receive and review of Plaintiff's letter demanding the names, job titles, contact information, and personal addresses of all healthcare providers at HCA Houston Healthcare Kingwood that provided care to him, those that conducted the investigation of his allegations of the facility, and those responsible for the video surveillance footage of the hospital.
12/27/2022	MJA	0.2	0.2	\$205.00	\$41.00	L110	A108	Receive and review Plaintiff's 49-page Amended Motion for Sanctions, arguing that Defendant's attorneys filed the Counterclaim and Application for Temporary Injunction based on false allegations, have made improper contributions to the presiding judge in this matter, and Plaintiff's desire to call the attorneys to the stand to question them about their fraudulent intentions, as well as determine whether a response is merited at this time.
12/27/2022	MJA	1.1	1.1	\$205.00	\$225.50	L210	A104	Receive and review Plaintiff's 49-page Motion to Compel Defendant to Produce Rule 194.2 Initial Disclosures, which denies that HCA Kingwood served the required discovery, disregarding Defendant's e-service eight days prior to determine whether a response is merited at this time.
12/27/2022	MJA	0.6	0.6	\$205.00	\$123.00	L350	A104	Evaluate whether [REDACTED] [REDACTED] [REDACTED]
12/28/2022	MJA	0.5	0.5	\$205.00	\$102.50	L120	A104	[REDACTED] Prepare email to the client detailing [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
12/29/2022	MJA	1.2	1.2	\$205.00	\$246.00	L120	A106	[REDACTED] [REDACTED] [REDACTED]

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12/30/2022	NGA	0.8	0.8	\$310.00	\$248.00	L120	A104	Review and edit status update to carrier addressing [REDACTED] [REDACTED]
								Conference with [REDACTED] at facility regarding [REDACTED] [REDACTED] [REDACTED] Follow up from [REDACTED] indicating [REDACTED] [REDACTED]
1/10/2023	NGA	0.8	0.8	\$310.00	\$248.00	L110	A108	Communicated same to carrier.
1/10/2023	NGA	0.1	0.1	\$310.00	\$31.00	L110	A106	Prepare email correspondence to [REDACTED] informing her of [REDACTED] [REDACTED] [REDACTED]
1/10/2023	MJA	0.7	0.7	\$205.00	\$143.50	L110	A106	[REDACTED]
1/11/2023	NGA	0.1	0.1	\$310.00	\$31.00	L120	A104	Receive and review of court ruling regarding injunction
								Attention to upcoming hearing, preparing Motion for Sanctions to file against claimant and strategy regarding same
1/11/2023	NGA	0.5	0.5	\$310.00	\$155.00	L210	A101	[REDACTED]
1/11/2023	NGA	0.2	0.2	\$310.00	\$62.00	L120	A104	Conference call with [REDACTED] regarding same [REDACTED] [REDACTED]
1/11/2023	NGA	0.3	0.3	\$310.00	\$93.00	L120	A108	Conference call with [REDACTED] to provide update on the matter, [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
1/11/2023	NGA	0.7	0.7	\$310.00	\$217.00	L120	A108	Additional analysis of relevant authorities regarding procedural requirements for [REDACTED] [REDACTED]
1/11/2023	BEH	1.2	1.2	\$205.00	\$246.00	L120	A103	[REDACTED] [REDACTED] [REDACTED] Draft correspondence to client regarding same. [REDACTED]
1/11/2023	BEH	3.8	3.8	\$205.00	\$779.00	L120	A103	Review Plaintiff's amended motion for sanctions and relevant authorities regarding allegations in same as well as sanctions remedies under TCPRC 10.001 and TRCP 13 in preparation to draft response
1/11/2023	BEH	2.4	2.4	\$205.00	\$492.00	L120	A103	Review [REDACTED] [REDACTED] [REDACTED]
1/11/2023	MJA	0.3	0.3	\$205.00	\$61.50	L110	A104	[REDACTED]
1/12/2023	NGA	0.2	0.2	\$310.00	\$62.00	L120	A104	Receive and review communication from pro se plaintiff seeking clarification on ruling by court and seeking discovery.
1/12/2023	NGA	0.1	0.1	\$310.00	\$31.00	L120	A108	Attention to response to same.
								Review Plaintiff's Request for Findings of Fact and Conclusions of Law to determine [REDACTED] [REDACTED]
1/12/2023	MJA	0.2	0.2	\$205.00	\$41.00	L210	A104	Draft correspondence [REDACTED] [REDACTED]
1/13/2023	BEH	1.1	1.1	\$205.00	\$225.50	L120	A103	Receive and review Plaintiff's recent filings, including Plaintiff's Request for Production of Attending and Non-Attending HCA Kingwood Personnel's Contact Information and Home Addresses, as well as Plaintiff's Second Request for Production and Inspection of Video Surveillance Footage, and determine the necessity of a response.
1/13/2023	MJA	0.6	0.6	\$205.00	\$123.00	L350	A104	Begin draft of response to Motion for Sanctions. [REDACTED] [REDACTED] [REDACTED]
1/17/2023	BEH	2.9	2.9	\$205.00	\$594.50	L120	A103	Receive and review Plaintiff's 24-page "First Requests for Admissions & Production for Madison J. Addicks" and evaluate whether [REDACTED] [REDACTED] [REDACTED]
1/17/2023	MJA	0.7	0.7	\$205.00	\$143.50	L310	A104	[REDACTED]
1/18/2023	BEH	1.1	1.1	\$205.00	\$225.50	L120	A103	Continue draft of motion [REDACTED] Review discovery requests purportedly to Madison Addicks extensive analysis of [REDACTED] [REDACTED] [REDACTED]
1/18/2023	BEH	1.3	1.3	\$205.00	\$266.50	L120	A103	[REDACTED] [REDACTED]

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								Review whether [REDACTED]
1/18/2023	MJA	1.8	1.8	\$205.00	\$369.00	L120	A103	[REDACTED]
1/19/2023	NGA	0.7	0.7	\$310.00	\$217.00	L310	A104	Receive and review of various filings by pro se plaintiff including Request for Admissions directed to various members of our firm and [REDACTED]. Several subsequent communications from opposing counsel seeking information that is not discoverable and threatening to continue requests presuming that he has a right to do so.
1/19/2023	NGA	0.5	0.5	\$310.00	\$155.00	L120	A107	
1/19/2023	BEH	1.1	1.1	\$205.00	\$225.50	L120	A103	Begin draft of [REDACTED]
1/19/2023	MJA	1.6	1.6	\$205.00	\$328.00	L120	A104	Prepare general briefing on [REDACTED] for the purpose of including in Defendant's Motion for Sanctions.
1/19/2023	MJA	0.2	0.2	\$205.00	\$41.00	L110	A104	Review correspondence to Plaintiff regarding the imposition of potential sanctions in response to Plaintiff's improper and frivolous Motion for Sanctions against Defendant's counsel for the purpose of [REDACTED]
1/20/2023	BEH	0.9	0.9	\$205.00	\$184.50	L120	A103	Review additional letters from Pro Se Plaintiff. Continue draft of motion [REDACTED]
1/21/2023	NGA	0.5	0.5	\$310.00	\$155.00	L110	A107	Attention to communication from pro se plaintiff seeking information that is outside scope of discovery and response to same.
1/23/2023	NGA	0.3	0.3	\$310.00	\$93.00	L120	A106	Conference phone call with [REDACTED] to address [REDACTED]
1/23/2023	BEH	0.4	0.4	\$205.00	\$82.00	L120	A106	Conference with client regarding [REDACTED]
1/23/2023	BEH	3.8	3.8	\$205.00	\$779.00	L120	A103	Complete Response to Motion for Sanctions, [REDACTED]
1/23/2023	MJA	0.9	0.9	\$205.00	\$184.50	L240	A103	Prepare Proposed Order for Defendant HCA Houston Healthcare Kingwood's Response to Plaintiff's Motion for Sanction [REDACTED]
1/23/2023	MJA	1.8	1.8	\$205.00	\$369.00	L210	A103	Prepare Defendant HCA Houston Healthcare Kingwood's Motion for [REDACTED]
1/24/2023	MJA	1.7	1.7	\$205.00	\$348.50	L350	A103	Prepare Defendant's Motion for [REDACTED]
1/27/2023	MJA	0.2	0.2	\$205.00	\$41.00	L110	A108	Telephone call with the Clerk of the 234th Civil Court to determine whether Plaintiff's sanctions hearing has been passed, in light of his email correspondence requesting postponement.
1/27/2023	MJA	0.5	0.5	\$205.00	\$102.50	L250	A104	Receive and review Plaintiff's 17-page Motion for Continuance of Sanctions Hearing, as well as 6 exhibits, to determine [REDACTED]
2/2/2023	MJA	0.2	0.2	\$205.00	\$41.00	L210	A104	Review Plaintiff's Notice of Past Due Findings of Fact and Conclusions of Law for the purpose of [REDACTED]
2/3/2023	MJA	0.1	0.1	\$205.00	\$20.50	L110	A108	Receive and review email correspondence from the hospital [REDACTED]
2/6/2023	NGA	0.5	0.5	\$310.00	\$155.00	L210	A104	Receive and review of more filings from opposing counsel asking court to issue subpoenas on various individuals including police officers, physicians etc.
2/6/2023	MJA	0.8	0.8	\$205.00	\$164.00	L310	A103	Prepare Defendant HCA Houston Healthcare Kingwood's Response to Plaintiff's Second Request for Production and Inspection, objecting that Plaintiff is not entitled to such information due to his failure to produce a compliant expert report, per Texas Civil Practice & Remedies Code Section 74.351(s).
2/6/2023	MJA	0.4	0.4	\$205.00	\$82.00	L210	A104	Review Plaintiff's subpoena request of Judge Reeder's Court Reporter, Norma Alicia Thieme, and Houston Police Department Sargent Stewart, to determine [REDACTED]
2/7/2023	NGA	0.1	0.1	\$310.00	\$31.00	L210	A104	Receive and review of court's order denying plaintiff's Request for Finding of Fact and Conclusion of Law.

**Serpe Andrews PLLC
Time and Expense Details**

Report ID: OT2025 - 39690
Thursday, March 23, 2023

Client	Client Reporting Name	Matter	Matter Reporting Name	Billing Timekeeper				
HCA	Health Care Indemnity, Inc.	21238	Burke, Mark v. Kingwood	Andrews, Nicole				
Date	Timekeeper	Hours Worked	Hours to Bill	Rate	Amount	Task Code	Activity Code	Narrative
2/7/2023	MJA	0.1	0.1	\$205.00	\$20.50	L210	A104	Review Judge Reeder's Order Denying Plaintiff's Request for Findings of Fact and Conclusions of Law in preparation of [REDACTED]
2/9/2023	BEH	0.8	0.8	\$205.00	\$164.00	L120	A104	Review Plaintiff's First Amended Complaint and attached exhibits
2/9/2023	MJA	1.4	1.4	\$205.00	\$287.00	L210	A104	Review Plaintiff's 59-page Amended Petition, in addition to 23 attached exhibits, to discern new allegations against Defendant HCA Houston Healthcare Kingwood, including conspiracy and breach of fiduciary duty, for purposes of [REDACTED]
2/9/2023	MJA	2	2	\$205.00	\$410.00	L310	A103	Prepare Defendant HCA Houston Healthcare's Response to Plaintiff's Request for Production of Attending and Non-Attending Physicians, Nurses, Security Officers, Staff and Administrative Personnel, John Doe(s), Jane Doe(s), et al's Bios, Contact Information Including Home Addresses, objecting on the basis that Plaintiff has failed to produce a compliant Chapter 74 Expert Report, in addition to its irrelevant, burdensome, and harassing nature
2/10/2023	NGA	1.5	1.5	\$310.00	\$465.00	L210	A104	Receive and review of pro se plaintiff's amended petition comprised of 58 pages as well as multitude of exhibits, websites, articles related to HCA and his allegations against facility, MDs, our firm, specific attorneys, other cases to explain his overall position.
2/10/2023	BEH	0.4	0.4	\$205.00	\$82.00	L120	A103	Review and amend second set of discovery responses
2/10/2023	MJA	1.9	1.9	\$205.00	\$389.50	L310	A103	Revise Defendant HCA Houston Healthcare Kingwood's Motion [REDACTED]
2/13/2023	NGA	0.2	0.2	\$310.00	\$62.00	L310	A104	Review and edit responses to plaintiff discovery
2/13/2023	MJA	0.2	0.2	\$205.00	\$41.00	L110	A104	Receive and review Plaintiff's email correspondence in reply to our discovery filings and attached website post alleging Defendant counsel's intent to wilfully delay litigation in anticipation of [REDACTED]
2/14/2023	MJA	0.8	0.8	\$205.00	\$164.00	L210	A104	Receive and evaluate Plaintiff's Notice of Request to Issue Subpoenas for Randy Chung, M.D., Sharon Addicks, and Jeffery Addicks and related website post for the purpose of [REDACTED]
2/15/2023	MJA	3.2	3.2	\$205.00	\$656.00	L310	A103	Prepare Defendant HCA Houston Healthcare Kingwood's Response to Plaintiff's Requests for Admissions and Production for Madison J. Addicks, objecting that Plaintiff has not produced a compliant expert report per Texas Civil Practice & Remedies Code § 74.351(s) and thus is not entitled to such information, in addition to noting the requests themselves are harassing, irrelevant, and outside the purview of this matter.
2/16/2023	NGA	0.3	0.3	\$310.00	\$93.00	L310	A104	Review and edit discovery with attention to objections and responses to Request for Admissions.
2/16/2023	BEH	1.1	1.1	\$205.00	\$225.50	L120	A103	Review and amend motion [REDACTED]
2/17/2023	MJA	0.1	0.1	\$205.00	\$20.50	L110	A104	Receive and review Plaintiff's email correspondence regarding his confirmation of receiving our discovery responses and dissatisfaction with them.
2/20/2023	BEH	0.8	0.8	\$205.00	\$164.00	L120	A104	Review Plaintiff's motion for extension of time and review relevant authorities regarding statutory prohibition on same in preparation to draft response [REDACTED]
2/20/2023	MJA	0.3	0.3	\$205.00	\$61.50	L210	A104	Review Plaintiff's First Motion for Extension of Time to Provide Plaintiff's Expert Report for purposes of [REDACTED]
2/21/2023	MJA	0.2	0.2	\$205.00	\$41.00	L110	A104	Receive and review Plaintiff's email correspondences regarding his criticisms of Defendant HCA Houston Healthcare Kingwood's responses [REDACTED]
2/22/2023	MJA	1.3	1.3	\$205.00	\$266.50	L120	A106	Prepare email correspondence to [REDACTED] detailing [REDACTED]
2/23/2023	NGA	0.2	0.2	\$310.00	\$62.00	L310	A104	Attention to responses to Request for Admissions propounded on one of our associates.
2/23/2023	NGA	0.7	0.7	\$310.00	\$217.00	L210	A104	Receive and review of plaintiff's motion for extension of time to file Ch 74 expert report detailing reasoning [REDACTED]

**Serpe Andrews PLLC
Time and Expense Details**

Report ID: OT2025 - 39690
Thursday, March 23, 2023

Client	Client Reporting Name	Matter	Matter Reporting Name	Billing Timekeeper
HCA	Health Care Indemnity, Inc	21238	Burke, Mark v. Kingwood	Andrews, Nicole

Date	Timekeeper	Hours Worked	Hours to Bill	Rate	Amount	Task Code	Activity Code	Narrative
2/26/2023	NGA	0.5	0.5	\$310.00	\$155.00	L110	A103	Review and edit status report to client apprising them of [REDACTED]

Billed Time								
Totals		131	131		\$28,625.00			

Billed Expenses			
Date	Exp Code	Amount	Narrative
10/1/2022	E107	\$42.56	Houston Express Inc.; Invoice # 88894; Per HIPPA guidelines, medical records securely delivered FROM CLIENT, Kingwood Hospital, to attorney
11/17/2022	E112	\$11.00	TX efile; Invoice 70281233; Answer to Original Petition
11/23/2022	E112	\$82.31	TX efile; Invoice 70447989; Def HCA Kingwood Original Counterclaim and Application for TI with Exhibits A-M
11/30/2022	E118	\$11.00	Secretary of State of Texas; business documents filed in accordance with applicable state laws
11/30/2022	E118	\$19.50	PACER; Invoice November; Court filings and related documents obtained from District Courts and / or Courts of Appeal

Billed Expenses	
Totals	\$166.37

Report	Hours Worked	Hours to Bill	Fee Amount	Expense Amount	Total Amount
Totals	131	131	\$28,625.00	\$166.37	\$28,791.37

End of Report