



September 3, 2015

VIA E-FILING

Carlotta S. Stauffer, Commission Clerk
Office of Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399

Docket No. 150137-SU - Petition for approval to defer legal costs by West Lakelend Wastewater, Inc.
Our File No.: 47136.07

Dear Ms. Stauffer:

The following are the responses of West Lakelend Wastewater, Inc. ("Utility"), to the Staff's First Data Request dated July 27, 2015 (this letter was not received by Mr. Smallridge when sent but was discovered in a routine review of open matters):

1. For each individual person providing legal services to the Utility, provide the billing rate, and an itemized description of the work performed. Please provide detailed hours worked and the billing rate associated with each activity.
Response: See attached invoices.
2. What is the status of the lawsuit?
Response: The attorneys have met and reached agreement and an Easement is being drafted.
3. Please state whether any of these invoiced amounts were expensed on West Lakeland's 2013 and 2014 Annual Reports. In your response, please include O&M expense account name(s) and number(s) the Utility recorded them in, if applicable.
Response: The invoices were not included in those Annual Reports.

Should you have any questions regarding this filing, please do not hesitate to give me a call.

Very truly yours,

A handwritten signature in blue ink that reads "Martin S. Friedman".

MARTIN S. FRIEDMAN
For the Firm

MSF/
Enclosures

cc: Mike Smallridge (via email)
Suzanne Brownless, Esquire (via email)

Morrell, P.A.
P.O. Box 2786
Lakeland, FL 33806-2786

Ph: (863)802-8037 Fax: (863)802-5312

Smallridge
1902 Barton Park Rd.
Suite 201
Auburndale, FL 33823

October 31, 2014

File #: WLWW-0001
Inv #: 14754

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-09-14	Meet with client re: work on access to spray field	1.00	285.00	EFM
	Totals	1.00	<hr/> \$285.00	

Invoice #:

Total Fees & Disbursements	\$285.00
Retainer Applied	\$0.00
Transfer from Trust to General	\$285.00
Previous Balance	\$0.00
Previous Payments	\$0.00
Balance Due Now	\$0.00

**PLEASE INCLUDE INVOICE # ON YOUR CHECK
OUR CLOSING DATE IS THE LAST DAY OF EACH MONTH. IF YOU REMIT A PAYMENT
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STATEMENT.**

DUE UPON RECEIPT; INTEREST PAYABLE AT 1.25% PER MONTH 30 DAYS FROM DATE OF STATEMENT

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Smallridge
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November 30, 2014

File #: WLWW-0001
Inv #: 14803

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Nov-07-14	Draft correspondence to Transworld	0.50	142.50	EFM
Nov-12-14	Teleconference with client re: strategy for Easement over Transworld property	0.30	85.50	EFM
Nov-19-14	Review correspondence from Attorney Smith	0.20	57.00	EFM
Nov-25-14	Teleconference with client re: follow-up demand to Transworld and strategy for access to spray field	0.60	171.00	EFM
Nov-26-14	Teleconference with Attorney Randall Smith re status of development order and workout lease/easement.	0.30	85.50	EFM
	Totals	1.90	<hr/> \$541.50	

Invoice #:

Total Fees & Disbursements	\$541.50
Retainer Applied	\$0.00
Transfer from Trust to General	\$541.50
Previous Balance	\$285.00
Previous Payments	\$285.00
Balance Due Now	\$0.00

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Smallridge
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December 31, 2014

File #: WLWW-0001
Inv #: 14862

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Dec-03-14	Email correspondence with Client regarding status of development order.	0.20	57.00	EFM
Dec-12-14	Correspondence with Attorney Randall Smith re: follow up on development order.	0.20	57.00	EFM
	Totals	0.40	<hr/> \$114.00	

DISBURSEMENTS

Dec 01/14	Postage log		\$6.48	
	Totals		<hr/> \$6.48	

Invoice #:

Total Fees & Disbursements	\$120.48
Retainer Applied	\$0.00
Transfer from Trust to General	\$0.00
Previous Balance	\$541.50
Previous Payments	\$541.50
Balance Due Now	\$120.48

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January 31, 2015

File #: WLWW-0001
Inv #: 14965

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Jan-14-15	Meet with client re: Development Order and strategy to obtain Easement or long-term lease	1.50	427.50	EFM
	Totals	1.50	<hr/> \$427.50	

Invoice #:

Total Fees & Disbursements	\$427.50
Retainer Applied	\$0.00
Transfer from Trust to General	\$427.50
Previous Balance	\$0.00
Previous Payments	\$0.00
Balance Due Now	\$0.00

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Smallridge
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February 28, 2015

File #: WLWW-0001
Inv #: 15024

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Feb-11-15	Draft correspondence to client re: litigation costs	0.50	145.00	EFM
	Totals	0.50	<hr/> \$145.00	

Invoice #:

Total Fees & Disbursements	\$145.00
Retainer Applied	\$0.00
Transfer from Trust to General	\$145.00
Previous Balance	\$0.00
Previous Payments	\$0.00
Balance Due Now	\$0.00

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Smallridge
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April 30, 2015

File #: WLWW-0001
Inv #: 15107

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Mar-05-15	Teleconference with client re: prepare Complaint for Prescriptive Easement	0.30	87.00	EFM
Apr-24-15	Conference with client re: proceed with litigation; Meet with legal assistant re: review of files to begin finding facts to support Causes of Action	1.10	319.00	EFM
	Totals	1.40	<hr/> \$406.00	

DISBURSEMENTS

Mar 02/15	Postage		\$0.48	
Apr 01/15	60 Copies at \$0.25 per page		\$15.00	
	Totals		<hr/> \$15.48	

Invoice #:

Total Fees & Disbursements	\$421.48
Retainer Applied	\$0.00
Transfer from Trust to General	\$421.48
Previous Balance	\$145.00
Previous Payments	\$145.00
<hr/>	
Balance Due Now	\$0.00

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May 31, 2015

File #: WLWW-0001
Inv #: 15150

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-01-15	Attorney conference re: litigation strategy; review file for evidence of prior use of land or prescriptive easement rights	1.00	95.00	JC
May-05-15	Meet with legal assistant re: Post Closing Agreement with Transworld; Draft correspondence to client re: same	1.00	290.00	EFM
	Attorney conference re: results of review of file, Post Closing Agreement executed by Transworld, Lease Provision of original contract for sale to Santrust, assignability of the Lease Provision to Transworld, and litigation strategy	0.50	47.50	JC
	Research re: signed Britt lease; Attorney conference re: same	0.60	57.00	LF
May-28-15	Research elements of prescriptive easement; Begin drafting Complaint; Correspond with client re: continued use of spray fields and ponds	2.10	609.00	EFM
	Totals	5.20	<hr/> \$1,098.50	

Invoice #:

Total Fees & Disbursements	<u>\$1,098.50</u>
Retainer Applied	\$0.00
Transfer from Trust to General	\$1,098.50
Previous Balance	\$0.00
Previous Payments	\$0.00
	<u> </u>
Balance Due Now	\$0.00

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June 30, 2015

File #: WLWW-0001
Inv #: 15209

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Jun-01-15	Review file for 2008 Lease Agreement; Correspond with client re: order creating receivership; Review same	1.60	464.00	EFM
	Attorney conference re: review of file, continuous use of spray filed, and possibility of Lease Agreement may still be in place	0.30	28.50	JC
Jun-16-15	Review file; organize and interpret exhibits to the Complaint for initial draft; prepare exhibits for filing	0.50	47.50	JC
Jun-18-15	Attorney conference re: pending draft, exhibits prepared for same, and evidence supporting Count I	0.20	19.00	JC
Jun-23-15	Westlaw research re: elements of a prescriptive easement; Continue drafting Complaint	1.10	319.00	EFM
	Westlaw research re: Elements of Prescriptive Easement and Easement Implied in law		141.75	EFM
Jun-24-15	Revise Complaint	0.50	47.50	JC
Jun-29-15	Westlaw research on implied easements; Review legal descriptions	1.50	435.00	EFM

Invoice #:

Jun-30-15	Finalize Complaint; review legal descriptions of parcel for easement; Meet with legal assistant re: same	1.50	435.00	EFM
	Attorney conference re: adding a Count to the Complaint and additional Exhibits; finalize Complaint; file same with the Court	1.00	95.00	JC
	Totals	8.20	<u>\$2,032.25</u>	
	Total Fees & Disbursements			\$2,032.25
	Retainer Applied			\$0.00
	Transfer from Trust to General			\$2,032.25
	Previous Balance			\$0.00
	Previous Payments			\$0.00
	Balance Due Now			\$0.00

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July 31, 2015

File #: WLWW-0001
Inv #: 15265

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Jul-01-15	Follow-up on Summons served	0.20	58.00	EFM
	FL Division of Corporations research re: Registered Agent; draft Summons; file same with the Court	0.60	57.00	JC
Jul-07-15	Review Summons issued by the Clerk; prepare service package and instructions re: same	0.40	38.00	JC
Jul-09-15	Review original Return of Service upon Transworld; attorney conference re: same; Draft Notice of Filing; file same with the Court	0.60	57.00	JC
Jul-13-15	Review Summons; Review and sign Notice of Filing	0.20	58.00	EFM
Jul-21-15	Draft correspondence to Opposing Counsel re: agree to extension and meeting; Review correspondence from Opposing Counsel re: offer for resolution meeting; Correspond with client re: same	0.70	203.00	EFM
Jul-24-15	Teleconference with attorney Smith re: arrange client-only meeting; Contact client re: same and draft correspondence to attorney Smith re: same	0.50	145.00	EFM

Invoice #:

Jul-29-15	Correspond with Opposing Counsel and client re: set up client meeting	0.30	87.00	EFM
	Totals	3.50	<u>\$703.00</u>	

DISBURSEMENTS

Jul 01/15	American Express Charges for Filing Civil Complaint	\$412.00
Jul 20/15	Invoice from Orange Legal, Inc. for Process Service to	\$37.50
Jul 31/15	Postage	\$0.49
	Copies @ \$0.25 /each	\$20.00
	Totals	<u>\$469.99</u>
	Total Fees & Disbursements	\$1,172.99
	Retainer Applied	\$0.00
	Transfer from Trust to General	\$1,172.99
	Previous Balance	\$2,032.25
	Previous Payments	\$2,032.25
	Balance Due Now	<u>\$0.00</u>

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