

United States Bankruptcy Court for the District of Delaware	
Name of Debtor: Avon Products, Inc. Case Number: 24-11837	For Court Use Only Claim Number: 0000010001 File Date: 08/16/2024 16:03:11

Proof of Claim (Official Form 410)

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. With the exception of 503(b)(9), do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503. Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

04/22

Part 1: Identify the Claim

1. Who is the current creditor?
 Name of the current creditor (the person or entity to be paid for this claim): RICHARDSON PLOWDEN
 Other names the creditor used with the debtor: _____

2. Has this claim been acquired from someone else? No Yes. From whom? _____

3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Name RICHARDSON PLOWDEN
 Address RICHARDSON PLOWDEN LAW FIRM
235 MAGRATH DARBY BLVD
SUITE 100
 City MT PLEASANT
 State SC ZIP Code 29464
 Country (if International): United States of America
 Phone: 8438056550
 Email: HELLIOTT@RICHARDSONPLOWDEN.COM

Where should payments to the creditor be sent? (if different)

Name _____
 Address _____

 City _____
 State _____ ZIP Code _____
 Country (if International): _____
 Phone: _____
 Email: _____

4. Does this claim amend one already filed?
 No
 Yes.
 Claim number on court claims register (if known) _____
 Filed on _____
 MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?
 No
 Yes.
 Who made the earlier filing?

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?

No
 Yes.
 Last 4 digits of the debtor's account or any number you use to identify the debtor:

7. How much is the claim?
 \$ 17,016.84

Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim?
 Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information.

 Employee - Wages, Benefits, Severance

9. Is all or part of the claim secured?
 No
 Yes. The claim is secured by a lien on property.
Nature of property:
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (official Form 410-A) with this *Proof of Claim*.

Motor vehicle
 Other. Describe: _____

Basis for perfection:

 Attach redacted copies of documents, if any, that show evidence of perfection of security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____

Amount of the claim that is secured: \$ _____

Amount of the claim that is unsecured: \$ _____
 (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____%
 Fixed Variable

10. Is this claim based on a lease?
 No
 Yes. **Amount necessary to cure any default as of the date of petition.**
 \$ _____

11. Is this claim subject to a right of setoff?
 No
 Yes. Identify the property:

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?
 No
 Yes. *Check one:*
 Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).
 Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).
 Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).
 Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).
 Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).
 Other. Specify subsection of 11 U.S.C. § 507 (a) (_____) that applies.

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

13. Does this claim qualify as an Administrative Expense under 11 U.S.C. § 503(b)(9)?
 No
 Yes. **Amount that qualifies as an Administrative Expense under 11 U.S.C. § 503(b)(9):** \$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other co-debtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

James H. Elliott, JR. 08/16/2024 16:03:11
Signature Date

Provide the name and contact information of the person completing and signing this claim:

Name JAMES H. ELLIOTT, JR.

Address RICHARDSON PLOWDEN
235 MAGRATH DARBY BLVD
SUITE 100

City MT PLEASANT

State SC Zip 29464

Country (in international) United States of America

Phone 843-805-6550

Email jelliott@richardsonplowden.com

Fill in this information to identify the case:

Debtor 1 _____
Debtor 2 _____
(Spouse, if filing)
United States Bankruptcy Court for the: _____ District of _____
Case number _____

Official Form 410 Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?

Name of the current creditor (the person or entity to be paid for this claim)
Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

No
 Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Where should notices to the creditor be sent?

Where should payments to the creditor be sent? (if different)

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Name

Name

Number Street

Number Street

City State ZIP Code

City State ZIP Code

Contact phone

Contact phone

Contact email

Contact email

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?

No
 Yes. Claim number on court claims registry (if known) _____

Filed on _____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

No
 Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. **Do you have any number you use to identify the debtor?** No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ _

7. **How much is the claim?** \$_____. **Does this amount include interest or other charges?**
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. **What is the basis of the claim?** Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. **Is all or part of the claim secured?** No
 Yes. The claim is secured by a lien on property.

Nature of property:

Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.

Motor vehicle

Other. Describe: _____

Basis for perfection: _____

Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property: \$ _____

Amount of the claim that is secured: \$ _____

Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %

Fixed

Variable

10. **Is this claim based on a lease?** No
 Yes. **Amount necessary to cure any default as of the date of the petition.** \$ _____

11. **Is this claim subject to a right of setoff?** No
 Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check one:

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code

Contact phone _____ Email _____

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 15, 2024

Billed through 08/14/2024

Invoice# 009607 - 00010 - 249191 JHE

Karen Abrenavel and Peter Glass

Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

ROYA OWLAD GALLEHDAR and ABDUL HASSAN OWLAD
GALLEHDAR V AVON PRODUCTS, INC.

Civil Action#: 2024-cp-40-04185

Our file# 009607 -00010

Matter Summary

Total professional fees	\$1,170.00
Total of new charges billed	\$1,170.00
Plus net balance forward	\$39.00
<i>Total balance now due</i>	<i>\$1,209.00</i>

For Professional Services Rendered

08/06/2024 JHE	Drafted the answer to the complaint	1.50 hrs
08/09/2024 JHE	Receipt and review of the Answers of Brentagg, Clinique, Estee Lauder, MAC Cosmetics, Shulton, Proctor and Gamble, Loreal and MTD, BCDI	1.80 hrs
08/10/2024 JHE	Receipt and review of the Answer of Pfizer	0.20 hrs
08/10/2024 JHE	Receipt and review of the Answer of Longs Drugstores	0.20 hrs
08/10/2024 JHE	Receipt and review of the Motion to Dismiss of Longs Drugstores	0.20 hrs
	Total fees for this matter	<u>\$1,170.00</u>

Expenses Incurred

Billing Summary

Elliott, Jr, James H	3.90	300.00 /hr	\$1,170.00
Total fees for all Timekeepers			<u>\$1,170.00</u>
Total expenses			\$0.00

Avon Products, Inc.

Invoice# 249191
009607 00010

Page 2

Total of new charges for this invoice

\$1,170.00

* Prepaid cash remaining balance is \$0.00
** Trust account remaining balance is \$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 15, 2024

Billed through 08/14/2024

Invoice# 009607 - 00009 - 249190 JHE

Karen Abrenavel and Peter Glass

Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

JACQUELINE CAMERON V AVON PRODUCTS, INC.

Civil Action#: 2024CP4001758

Our file# 009607 -00009

Matter Summary

Total professional fees	\$30.00
Total of new charges billed	\$30.00
Plus net balance forward	\$769.76
<i>Total balance now due</i>	<i>\$799.76</i>

For Professional Services Rendered

08/04/2024 JHE	Receipt and review of notice of deposition of Gina Cameron	0.10 hrs
	Total fees for this matter	\$30.00

Expenses Incurred

Billing Summary

Elliott, Jr, James H	0.10	300.00 /hr	\$30.00
Total fees for all Timekeepers			\$30.00
Total expenses			\$0.00
Total of new charges for this invoice			\$30.00

* Prepaid cash remaining balance is \$0.00
** Trust account remaining balance is \$0.00

Avon Products, Inc.

Invoice# 249190
009607 00009

Page 2

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 15, 2024

Billed through 08/14/2024

Invoice# 009607 - 00006 - 249189 JHE

Karen Abrenavel and Peter Glass

Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

Gerard Thomas et al v. Avon Products, Inc.
Civil Action#: 2023-CP-40-06323

Our file# 009607 -00006

Matter Summary

Total professional fees	\$2,950.00
Total of new charges billed	\$2,950.00
Plus net balance forward	\$259.00
<i>Total balance now due</i>	<i>\$3,209.00</i>

For Professional Services Rendered

08/01/2024 HME	Finalize Avon Responses to Plaintiff RTA	0.20 hrs
08/01/2024 HME	Finalize Avon Responses to Supplemental Interrogatories	0.20 hrs
08/01/2024 HME	Email to counsel with Avon Responses to RTA and Supplemental Interrogatories and document production link.	0.10 hrs
08/01/2024 HME	Update of Egnyte with Avon RTA and Supplemental Responses to Interrogatories and document production information AV_Thomas	0.50 hrs
08/04/2024 JHE	Receipt and review of OBJECTIONS AND RESPONSES OF DEFENDANT CONOPCO, INC. TO PLAINTIFFS' ADDITIONAL INTERROGATORY REQUESTS on behalf of Conopco, Inc.	0.40 hrs
08/04/2024 JHE	Receipt and review of OBJECTIONS AND RESPONSES OF DEFENDANT CONOPCO, INC. TO PLAINTIFFS' REQUESTS FOR ADMISSION on behalf of Conopco, Inc	0.40 hrs
08/04/2024 JHE	Review of Avon's answers to request to admit	0.20 hrs

08/04/2024 JHE	Receipt and review of Proctor & Gamble's Responses to Plaintiff's Additional Interrogatories and Requests for Admissions	0.30 hrs
08/04/2024 JHE	Receipt and review of Shulton, Inc. Responses to Plaintiff Additional Interrogatories and Requests for Admissions	0.30 hrs
08/04/2024 JHE	Receipt and review of Coty's Responses to Plaintiff Additional Interrogatories and Requests for Admissions	0.30 hrs
08/08/2024 JHE	Drafted objections and reply to the topics of inquiry in the plaintiffs notice of the deposition of Avon	3.50 hrs
08/08/2024 JHE	Drafted objections and responses to the Plaintiff's requests to produce attached to the notice of Avon's corp rep deposition	3.50 hrs
08/08/2024 JHE	Emails with NCC about responses to the corporate representative deposition notice topics and the request for documents	0.50 hrs
Total fees for this matter		<hr/> \$2,950.00

Expenses Incurred**Billing Summary**

Elliott, Jr, James H	9.40	300.00 /hr	\$2,820.00
Elliott, Helen M	1.00	130.00 /hr	\$130.00
Total fees for all Timekeepers			<hr/> \$2,950.00
Total expenses			\$0.00
<i>Total of new charges for this invoice</i>			<hr/> <i>\$2,950.00</i> <hr/>

* Prepaid cash remaining balance is \$0.00
 ** Trust account remaining balance is \$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 5, 2024

Billed through 07/31/2024

Invoice# 009607 - 00004 - 248583 JHE

Karen Abrenavel and Peter Glass
Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

Michael L. Perry and Lonnie L. Long v. Avon Products, Inc.
Civil Action#: 2023-CP-40-04072

Our file# 009607 -00004

Matter Summary

Total professional fees	\$8,901.00
Total expenses incurred	\$2,591.08
Total of new charges billed	\$11,492.08
Plus net balance forward	\$18,059.85
Total balance now due	\$29,551.93

For Professional Services Rendered

07/01/2024 JHE	Emails back and forth with all about McCarthy deposition	0.30 hrs
07/01/2024 JHE	Receipt and review of J&J's Defendants' Objections and Responses to Exhibit A attached to Plaintiff's Notice of Deposition of David Weill and Subpoena (.2)	0.20 hrs
07/01/2024 JHE	Receipt and review of J&J defendants' Objections and Responses to Exhibit A attached to Plaintiff's Notice of Deposition of Gregory Diette and Subpoena Duces Tecum (.2)	0.20 hrs
07/01/2024 JHE	Receipt and review of J&J Defendants' Objections and Responses to Exhibit A attached to Plaintiff's Notice of Deposition of Dominik Alexander and Subpoena Duces Tecum (.2)	0.20 hrs
07/01/2024 JHE	Receipt and review of J&J Defendants' Objections and Responses to Exhibit A attached to Plaintiff's Notice of Deposition of Matthew Sanchez and Subpoena Duces Tecum (.2)	0.20 hrs

07/01/2024 HME	Receipt and review of the Notice of Deposition of Dr. Bailey in order to update deposition spreadsheet	0.10 hrs
07/01/2024 HME	Receipt and review of the Notice of Deposition of Dr. Rownd in order to update deposition spreadsheet	0.10 hrs
07/01/2024 HME	Receipt and review of the Notice of Deposition of Dr. Haber in order to update deposition spreadsheet	0.10 hrs
07/01/2024 HME	Receipt and review of the Notice of Deposition of Dr. Longo in order to update deposition spreadsheet	0.10 hrs
07/01/2024 HME	Receipt and review of the Notice of Deposition of Dr. Madigan in order to update deposition spreadsheet	0.10 hrs
07/01/2024 HME	Receipt and review of the Amended Notice of Deposition of T. McCarthy in order to update deposition spreadsheet	0.10 hrs
07/01/2024 HME	Update of deposition spreadsheet	0.50 hrs
07/01/2024 HME	Email to trial and expert teams with updated deposition spreadsheet and deposition notices	0.10 hrs
07/01/2024 HME	Draft Cross notice of deposition of Diette	0.20 hrs
07/01/2024 HME	Email to all counsel with Avon Cross notice of deposition of Diette	0.10 hrs
07/02/2024 JHE	Receipt and review of Defendant Food Lion's Witness Disclosures; Defendant Food Lion's Responses to Plaintiffs' Standard Interrogatories (Exhibit 4); and Defendant Food Lion's Answers and Objections to Plaintiffs' First Set of Interrogatories (Exhibit 1)	0.30 hrs
07/02/2024 JHE	Sent an email to all counsel of record advising that we are joining in J&J's Response and objection the Diette depo notice	0.10 hrs
07/02/2024 JHE	Participated in mediation by zoom	5.00 hrs
07/02/2024 JHE	Reviewed and revised Motions in Limine on : Exclude references to Ovarian Cancer; Preclude opinions of non-testifying experts; preclude documents from other companies like J&J; Preclude Haber opinions; Preclude Longo opinions preclude IWGACP	1.50 hrs

07/02/2024 JHE Drafted MIL to exclude Avon products not at issue 1.00 hrs

07/02/2024 HME Email to Avon NCC and expert trial teams regarding the below in one email: 0.10 hrs

- . Plaintiffs' 1st Amended Notice of the 30(b)(6) Deposition of Long's Drugstores of SC
- . Plaintiffs' Notice of Deposition of Expert Kelly Tuttle
- . Plaintiffs' Notice of Deposition of Expert Paul Nony
- . Plaintiffs' Notice of Deposition of Expert Steven Weisman
- . Plaintiffs' Notice of Deposition of Expert William Thompson
- . Plaintiffs' Notice of Deposition of Expert Andre Nel
- . Plaintiffs' Notice of Deposition of Expert Brooke Mossman
- . Plaintiffs' Notice of Deposition of Expert Lee Poye
- . Plaintiffs' Notice of Deposition of Expert Alan Segrave
- . Plaintiffs' Notice of Deposition of Expert Len van Zyl
- . Plaintiffs' 1st Amended Notice of Deposition of Expert David Weill
- . Plaintiffs' 1st Amended Notice of Deposition of Expert Matthew Sanchez
- . Plaintiffs' Notice of Deposition of Expert Jennifer Ellis
- . Plaintiffs' Notice of Deposition of Expert Stacey Benson
- . Plaintiffs' Notice of Deposition of Expert Jenn Sahmel
- . Plaintiffs' 1st Amended Notice of Deposition of Expert Dominik Alexander
- . Plaintiffs' Notice of Deposition of Expert Derek Dreschel
- . Plaintiffs' Notice of Deposition of Expert Allan Feingold

07/02/2024 HME	Update of deposition spreadsheet for attorney use with the below notices:	0.50 hrs
	<ul style="list-style-type: none"> . Plaintiffs' 1st Amended Notice of the 30(b)(6) Deposition of Long's Drugstores of SC . Plaintiffs' Notice of Deposition of Expert Kelly Tuttle . Plaintiffs' Notice of Deposition of Expert Paul Nony . Plaintiffs' Notice of Deposition of Expert Steven Weisman . Plaintiffs' Notice of Deposition of Expert William Thompson . Plaintiffs' Notice of Deposition of Expert Andre Nel . Plaintiffs' Notice of Deposition of Expert Brooke Mossman . Plaintiffs' Notice of Deposition of Expert Lee Poye . Plaintiffs' Notice of Deposition of Expert Alan Segrave . Plaintiffs' Notice of Deposition of Expert Len van Zyl . Plaintiffs' 1st Amended Notice of Deposition of Expert David Weill . Plaintiffs' 1st Amended Notice of Deposition of Expert Matthew Sanchez . Plaintiffs' Notice of Deposition of Expert Jennifer Ellis . Plaintiffs' Notice of Deposition of Expert Stacey Benson . Plaintiffs' Notice of Deposition of Expert Jenn Sahmel . Plaintiffs' 1st Amended Notice of Deposition of Expert Dominik Alexander . Plaintiffs' Notice of Deposition of Expert Derek Dreschel . Plaintiffs' Notice of Deposition of Expert Allan Feingold 	
07/03/2024 JHE	Discussed MIL's with trial counsel	0.40 hrs
07/03/2024 JHE	Discussed the status of the case and procedures with Barb Safechuck	0.30 hrs
07/03/2024 JHE	Emails to trial team about MILs and deadlines	0.30 hrs
07/03/2024 HME	Email to trial team regarding Pro Hac Vice applications and timeframe we need to submit.	0.10 hrs
07/03/2024 HME	Email to Willcox Savage and Laura Dolan with Nelson Mullins document production of medical records for their review.	0.10 hrs
07/08/2024 HME	Email with Laura Dolan, our expert for tender date for her deposition and trial availability.	0.10 hrs
07/08/2024 HME	Email to all counsel with tender date of our expert Laura Dolan	0.10 hrs

07/08/2024	HME	Emails to trial team with Dolan Notice of Deposition, Plaintiff's Supplemental discovery responses and updated deposition excel.	0.10 hrs
07/08/2024	HME	Email from DOBS regarding expert depositions Tuttle and Nony	0.10 hrs
07/08/2024	HME	Update of deposition excel for trial and expert teams	0.10 hrs
07/09/2024	JHE	Meeting with Perry trial team	0.80 hrs
07/09/2024	JHE	Receipt and review of numerous emails from Avon trial counsel about MIL's	0.30 hrs
07/09/2024	HME	Receipt of final Avon MIL #1-9 and Page line designations for filing and service	0.10 hrs
07/09/2024	HME	Finalize Avon MIL #1-9 and corresponding exhibits and Page line designations for filing and service per SC Statue.	2.80 hrs
07/09/2024	HME	Preparation of Avon Joinder MIL for NCC review	0.20 hrs
07/09/2024	HME	Email to NCC with Plaintiff's filed MIL, Page line designations and Avon filed MIL copies	0.20 hrs
07/10/2024	JHE	Review Motions in Limine being sent by National trial counsel for filing	1.40 hrs
07/10/2024	HWA	Appear on behalf of insured for deposition of Royston DBA Pharma Tech	7.10 hrs
07/11/2024	JHE	Emails back and forth with attorneys about MIL's expert motions and trial issues	0.70 hrs
07/11/2024	JHE	Receipt and review of numerous emails of Trial counsel about experts, MIL's and trial preparation	0.50 hrs
07/11/2024	JHE	Review Dr. Weil's report	1.00 hrs
07/11/2024	JHE	Receipt and review of Plaintiff's page line designations	0.20 hrs
07/11/2024	JHE	Receipt and review of Digestion Tissue split order	0.20 hrs
07/11/2024	JHE	Discussion with A. Ritchie about issues with the tissue digestion	0.30 hrs

07/11/2024 HME	Preparation of Motion Pro Hac Vice, application and proposed Order for Alicia Ritchie for filing with the court.	0.50 hrs
07/11/2024 HME	Preparation of Motion Pro Hac Vice, application and proposed Order for Mike Brown for filing with the court.	0.50 hrs
07/11/2024 HME	Preparation of Motion Pro Hac Vice, application and proposed Order for Leianne McEvoy for filing with the court.	0.50 hrs
07/12/2024 HME	Finalize and prepare Avon MIL Haber for filing with the court per SC Statute and exhibits	0.50 hrs
07/12/2024 HME	Finalize and prepare Avon MIL Bailey for filing with the court per SC Statute and exhibits	0.50 hrs
07/12/2024 HME	Receipt of Notice of depositions of Kenvu and J&J 30b6 from DOBS.	0.10 hrs
07/12/2024 HME	Update of deposition excel	0.10 hrs
07/12/2024 HME	Email of excel and Notice of depositions of Kenvu and J&J 30b6 to Avon NCC	0.10 hrs
07/12/2024 HME	Email to Avon experts with Dr. Madigan (Plaintiff expert) materials.	0.10 hrs
07/12/2024 HME	Draft Avon cross notice of depostion of Plaintiff expert - Johnson	0.20 hrs
07/12/2024 HME	Email to all counsel with Avon cross notice of depostion of Plaintiff expert - Johnson	0.10 hrs
07/12/2024 HME	Emails with Alicia Ritchie regarding private investigator contact in Illinois regarding information on Plaintiff sister, Michelle Perry	0.10 hrs
07/12/2024 HME	Phone conference and emails with private investigator in Illinois regarding information on Plaintiff sister, Michelle Perry	0.50 hrs
07/12/2024 HME	Email to Alicia Ritche regarding PI findings and information on Michelle Perry	0.10 hrs
07/14/2024 JHE	Receipt and review of Plaintiffs' objections to Madigan's deposition	0.20 hrs

07/14/2024	JHE	Receipt and review of Madigan's General Report	0.20 hrs
07/14/2024	JHE	Receipt and review of Madigan's Hill report 5.1.24	0.20 hrs
07/14/2024	JHE	Receipt and review of Madigan's Hill report 12.31.23	0.20 hrs
07/15/2024	HME	Email from DOBS regarding new tender date of expert Johnson	0.10 hrs
07/15/2024	HME	Email to NCC, Will Sav and our expert Laura Dolan regarding new tender date of Plaintiff expert Johnson. Laura Dolan specifically requesting to know Johnson deposition date in order to have her deposition take place after Johnson - trial strategy	0.10 hrs
07/15/2024	HME	Email to NCC and Will Sav with expert Mossman materials	0.10 hrs
07/15/2024	HME	Email to NCC and Will Sav with Plaintiff additional MIL #19	0.10 hrs
07/15/2024	HME	Preparation of Avon Cross notice of Plaintiff expert Zhang	0.20 hrs
07/15/2024	HME	Email service to all counsel with Avon Cross notice of Plaintiff expert Zhang	0.10 hrs
07/15/2024	HME	Multiple emails with NCC regarding remote testimony possibility of Lisa Gallo	0.20 hrs
07/15/2024	HME	Email from DOBS regarding the depositions of Dr. van Zyl and Lee Poye not going forward.	0.10 hrs
07/15/2024	HME	Email to NCC and Will Sav with updated deposition excel	0.10 hrs
07/15/2024	HME	Update of deposition excel	0.10 hrs
07/15/2024	HME	Email and phone call with an additional investigator who is able to go to the home of Michelle Perry (Plaintiff's estranged sister) to see if she will talk to him regarding talc use products in the home she and Mr. Perry grew up in	0.60 hrs
07/15/2024	HME	Draft Avon's objections and responses to Plaintiff's Notice of Deposition of Dr. Seagrave (Avon expert) for Willcox Savage review	0.20 hrs

07/16/2024	JHE	Email with Trey Branham about proposed consent order for Lisa Gallo to testify by videoconference	0.10 hrs
07/17/2024	JHE	Emails with NCC and trial counsel about document production	0.20 hrs
07/17/2024	HME	Email to our expert Laura Dolan and NCC with the transcript of Lonnie Long, husband of Plaintiff	0.10 hrs
07/17/2024	HME	Receipt of report from additional private investigator who made contact and had discussions with Michelle Perry	0.10 hrs
07/17/2024	HME	Email to Alicia Ritchie with report from additional private investigator who made contact and had discussions with Michelle Perry	0.10 hrs
07/17/2024	MAM	Downloaded all MIL with corresponding exhibits from e-filing portal and placed into new folders in repository.	3.50 hrs
07/20/2024	JHE	Email request from NCC for draft Release of Avon	0.10 hrs
07/20/2024	JHE	Draft Release of Avon that is not the standard DOBS format at the request of NCC	0.50 hrs
07/20/2024	HME	Email to NCC with Draft Release of Avon prepared by James Elliott	0.10 hrs
Total fees for this matter			\$8,901.00

Expenses Incurred

05/23/2024	E123 Medical Records - Ciox Health	\$46.67
07/23/2024	Confidential Investigations, LLC; E120 Investigative Services into Michelle Perry	\$500.00
07/23/2024	Lauth Investigations International, Inc.; E120 Investigative Services into Michelle Perry	\$505.20
07/29/2024	Goucher Parker Spivey, LLC; E123 Court Reporter Cost for Lonnie Long transcript	\$1,310.45
07/29/2024	CIOX Health; E123 Medical Records	\$196.42
07/30/2024	FedEx; E107 Express Shipping SC Supreme Court, Columbia SC	\$32.34
Total expenses for this matter		\$2,591.08

Billing Summary

Avon Products, Inc.

Invoice# 248583
009607 00004

Page 9

Elliott, Jr, James H	17.10	300.00	/hr	\$5,130.00
Adams, Hunter W	7.10	240.00	/hr	\$1,704.00
Elliott, Helen M	12.40	130.00	/hr	\$1,612.00
McAuley, Morgan A	3.50	130.00	/hr	\$455.00
Total fees for all Timekeepers				<hr/> \$8,901.00
Total expenses				\$2,591.08
Total of new charges for this invoice				<hr/> <hr/> \$11,492.08

* Prepaid cash remaining balance is \$0.00
** Trust account remaining balance is \$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.
THANK YOU

ORIGIN ID:RBWA (843) 805-6550
HELEN ELLIOTT
RICHARDSON PLOWDEN & ROBINSON
235 MAGRATH DARBY BLVD
SUITE 100
MOUNT PLEASANT, SC 29464
UNITED STATES US

SHIP DATE: 12JUL24
ACTWGT: 0.25 LB
CAD: 105060453/NET4535

BILL SENDER

TO **OFFICE OF BAR ADMISSIONS**
SC SUPREME COURT
1231 GERVAIS ST

583J9/E0E4/9AE3

COLUMBIA SC 29201

REF: (803) 734-1080

PO:

DEPT:



MON - 15 JUL 5:00P
STANDARD OVERNIGHT

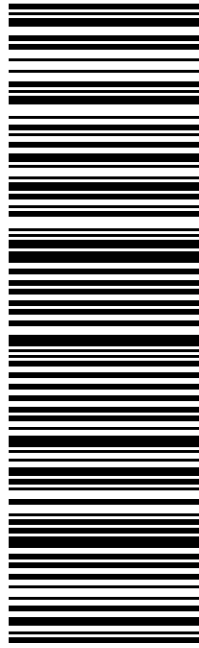
TRK# 7773 5115 6954

0201

DSR
29201

28 USCA

SC-US CAE



After printing this label:
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GOUCHER PARKER SPIVEY
An Esquire Deposition Solutions Company

GOUCHER PARKER SPIVEY, LLC
214-347-4781
www.GPS.LLC

INVOICE

Richardson Plowden & Robinson, P.A. - Mt. Pleasant
ATTN: James H. Elliott, Jr., Esq.
235 Magrath Darby Blvd., Suite 100
Mt. Pleasant, SC 29464

Invoice Number: 239331
Invoice Date: 07/25/2024
Job Number: 310041

In Re: Michael L. Perry and Lonnie L. Long vs. American International Industries, et al.
Case Number: 2023-CP-40-04072
Witness(s): Lonnie L. Long, III
Attendance Date: 07/11/2024, 12:00 p.m.

Description	Amount
Transcript Charges for the Deposition of: Witness: Lonnie L. Long, III - 190 Pages	
Certified Copy of Transcript - Expedited	1254.00
Exhibits	21.45
Processing & Compliance	35.00
	1310.45
	Invoice Total: 1310.45

Please Remit To:
Goucher Parker Spivey, LLC
P.O. Box 348
Millbury, MA 01527

EIN: 84-2933325



INVOICE

DATE: 7/19/2024
Invoice No.: 2407_104_FFI

CLIENT: Helen Elliot | Richardson Plowden & Robinson, P.A
235 Magrath Darby Blvd., Suite 100, Mount Pleasant, SC 29464



ITEM DESCRIPTION	UNIT COST	TOTAL
Fact Finding Interview_ 4 hours	\$120.00	\$480.00
Mileage (@ \$0.90 per mile) _ 28 miles	\$0.90	\$25.50
	Total Due	\$505.20

Payment due upon receipt
Make checks payable to Lauth Investigations International Inc,
for accounting purposes, checks are to be mailed to
1460 Spann Ave., Indianapolis, IN 46203

Thank you!!

Confidential Investigations, LLC

PO Box 47463

Indianapolis, IN 46247-0463

317-791-3180

mbauer01@comcast.net

www.confidentialinvestigationllc.com

Invoice



Confidential Investigations, LLC

Solving your problems.

BILL TO

Richardson Plowden & Robinson, P.A.
235 Magrath Darby Blvd., Suite 100
Mount Pleasant, SC 29464

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
2659	07/18/2024	\$500.00	07/18/2024	Due on receipt	

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
	Locate	Access numerous databases to locate Michelle Perry Your Ref.: Michelle Perry Our File No.: 24-1062	5	100.00	500.00

Federal Tax ID# 51-0643921

BALANCE DUE

\$500.00

Thank you for your business

Ciox Health - PAYMENTS ONLY
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
1-800-367-1500



Invoice #: 0462834939
Date: 06/02/2024
Customer #: 1958873

Ship to:

JAMES H ELLIOTT
RICHARDSON PLOWDEN
PO BOX 21203
CHARLESTON, SC 29413-1203

Bill to:

JAMES H ELLIOTT
RICHARDSON PLOWDEN
PO BOX 21203
CHARLESTON, SC 29413-1203

Records from:

MUSC HEALTH
171 ASHLEY AVE
CHARLESTON, SC 29425-8908

Requested By: RICHARDSON PLOWDEN
Patient Name: PERRY MICHAEL

DOB : 12/20/1969

Description	Quantity	Unit Price	Amount
Basic Fee			31.02
Retrieval Fee			0.00
Per Page Copy (Elect) 1	184	0.61	112.24
Per Page Copy (Elect) 2	30	0.80	24.00
Electronic Data Archive Fee			2.00
Certification Fee			11.00
Subtotal			180.26
Sales Tax			16.16
Invoice Total			196.42
Balance Due			196.42

Terms: Net 30 days Please remit this amount : \$196.42(USD)



Ciox Health - PAYMENTS ONLY
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
1-800-367-1500

Invoice #: 0462834939

Get future medical records as soon as they are processed,
by signing up for secure electronic delivery.
Register at: <https://www.smartrequest.com/>

Check # _____

Payment Amount \$ _____

Please return stub with payment.

Please include invoice number on check.

To pay invoice online, please go to <https://paycioxhealth.com/pay/> or call 800-367-1500.

Email questions to collections@cioxhealth.com.

Ciox Health - PAYMENTS ONLY
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
1-800-367-1500



Invoice #: 0461453496
Date: 05/22/2024
Customer #: 2349480

Ship to:
JAMES ELLIOTT JR
RICHARDSON PLOWDEN ET AL
235 MAGRATH DARBY BLVD
STE 100
MOUNT PLEASANT, SC 29464-3242

Bill to:
JAMES ELLIOTT JR
RICHARDSON PLOWDEN ET AL
235 MAGRATH DARBY BLVD
STE 100
MOUNT PLEASANT, SC 29464-3242

Records from:
MUSC HEALTH
171 ASHLEY AVE
CHARLESTON, SC 29425-8908

Requested By: RICHARDSON PLOWDEN ET AL DOB : 12/20/1969
Patient Name: PERRY MICHAEL

Description	Quantity	Unit Price	Amount
Basic Fee			31.02
Retrieval Fee			0.00
Per Page Copy (Paper) 1	1	0.80	0.80
Shipping			0.00
Certification Fee			11.00
Subtotal			42.82
Sales Tax			3.85
Invoice Total			46.67
Balance Due			46.67

Terms: Net 30 days Please remit this amount : \$46.67(USD)



Ciox Health - PAYMENTS ONLY
P.O. Box 409740
Atlanta, Georgia 30384-9740
Fed Tax ID 58 - 2659941
1-800-367-1500

Invoice #: 0461453496
Check # _____
Payment Amount \$ _____

Get future medical records as soon as they are processed,
by signing up for secure electronic delivery.
Register at: <https://www.smartrequest.com/>

Please return stub with payment.

Please include invoice number on check.

To pay invoice online, please go to <https://paycioxhealth.com/pay/> or call 800-367-1500.

Email questions to collections@cioxhealth.com.

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
June 6, 2024

Billed through 05/31/2024

Invoice# 009607 - 00005 - 247001 JHE

Karen Abrenavel and Peter Glass
Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

Anna Marie Gerken v. Avon Products, Inc.
Civil Action#: 2023-CP-40-06111

Our file# 009607 -00005

Matter Summary

Total professional fees	\$540.00
Total of new charges billed	\$540.00
Plus net balance forward	\$340.00
<i>Total balance now due</i>	<u><u>\$880.00</u></u>

For Professional Services Rendered

05/24/2024 JHE	Receipt and review of Motion to Stay regarding bankruptcy proceedings filed by counsel for Charles Chrystal.	0.10 hrs
05/26/2024 JHE	Receipt and review of Petition for Wrongful death settlement filed by DOBS	0.10 hrs
05/26/2024 JHE	Receipt and review of order approving wrongful death settlements	0.20 hrs
05/28/2024 JHE	Receipt and review of Fact and Witness designations for any impact on Avon of Dillards.	0.20 hrs
05/30/2024 JHE	Receipt and review of preliminary witness disclosures for any impact on client: Bayer Consumer Care Holdings LLC	0.20 hrs
05/30/2024 JHE	Receipt and review of preliminary witness disclosures for any impact on client: Bayer Healthcare LLC	0.20 hrs
05/30/2024 JHE	Receipt and review of preliminary witness disclosures for any impact on client: Coty	0.20 hrs

05/30/2024 JHE	Receipt and review of preliminary witness disclosures for any impact on client: Coty	0.20 hrs
05/30/2024 JHE	Receipt and review of preliminary witness disclosures for any impact on client: Estee Lauder	0.20 hrs
05/30/2024 JHE	Receipt and review of preliminary witness disclosures for any impact on client: Merck	0.20 hrs
Total fees for this matter		\$540.00

Expenses Incurred

Billing Summary

Elliott, Jr, James H	1.80	300.00 /hr	\$540.00
Total fees for all Timekeepers			\$540.00
Total expenses			\$0.00
<i>Total of new charges for this invoice</i>			<i>\$540.00</i>

* Prepaid cash remaining balance is \$0.00
 ** Trust account remaining balance is \$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.
 THANK YOU

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 5, 2024

Billed through 07/31/2024

Invoice# 009607 - 00005 - 248584 JHE

Karen Abrenavel and Peter Glass
Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

Anna Marie Gerken v. Avon Products, Inc.
Civil Action#: 2023-CP-40-06111

Our file# 009607 -00005

Matter Summary

Total professional fees	\$104.00
Total of new charges billed	\$104.00
Plus net balance forward	\$930.00
<i>Total balance now due</i>	<u><u>\$1,034.00</u></u>

For Professional Services Rendered

07/31/2024 HME	Update of deadline chart with pre-trial deadlines now that a trial date is set.	0.20 hrs
07/31/2024 HME	Email to Avon NCC and Avon Experts with new deadlines	0.10 hrs
07/31/2024 HME	Update trial deadline chart with pre-trial deadlines and email to client	0.20 hrs
07/31/2024 HME	At the request of Farah Nichol, review of file in order to update specific case information in KCIC	0.30 hrs
	Total fees for this matter	<u>\$104.00</u>

Expenses Incurred

Billing Summary

Elliott, Helen M	0.80	130.00 /hr	\$104.00
	Total fees for all Timekeepers		<u>\$104.00</u>
	Total expenses		\$0.00

Total of new charges for this invoice

\$104.00

* Prepaid cash remaining balance is \$0.00
** Trust account remaining balance is \$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.
THANK YOU

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 5, 2024

Billed through 07/31/2024

Invoice# 009607 - 00006 - 248585 JHE

Karen Abrenavel and Peter Glass
Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

Gerard Thomas et al v. Avon Products, Inc.
Civil Action#: 2023-CP-40-06323

Our file# 009607 -00006

Matter Summary

Total professional fees	\$259.00
Total of new charges billed	\$259.00
Plus net balance forward	\$2,508.31
<i>Total balance now due</i>	<u><u>\$2,767.31</u></u>

For Professional Services Rendered

07/02/2024 HME	Email to Avon NCC and discovery team regarding Plaintiff's Requests to Admit and additional Interrogatories to Avon	0.10 hrs
07/11/2024 JHE	Receipt and review of notice of deposition of Avon	0.30 hrs
07/31/2024 HME	Update of deadline chart with pre-trial deadlines now that a trial date is set.	0.20 hrs
07/31/2024 HME	Email to Avon NCC and Avon Experts with new deadlines	0.10 hrs
07/31/2024 HME	Preparation of draft verification for Lisa Gallo for Request to Admit	0.10 hrs
07/31/2024 HME	Preparation of draft verification for Lisa Gallo for Plaintiff's Supplemental Interrogatories to Avon	0.10 hrs
07/31/2024 HME	Emails back and forth with NCC discovery team and Wilcox Savage regarding information for Avon for Requests to Admit and Supplemental Interrogatories responses and status.	0.20 hrs

07/31/2024	HME	Update trial deadline chart with pre-trial deadlines and email to client	0.20 hrs
07/31/2024	HME	At the request of Farah Nichol, review of file in order to update specific case information in KCIC	0.30 hrs
Total fees for this matter			\$259.00

Expenses Incurred

Billing Summary

Elliott, Jr, James H	0.30	300.00	/hr	\$90.00
Elliott, Helen M	1.30	130.00	/hr	\$169.00
Total fees for all Timekeepers				\$259.00
Total expenses				\$0.00
<i>Total of new charges for this invoice</i>				<i>\$259.00</i>

* Prepaid cash remaining balance is	\$0.00
** Trust account remaining balance is	\$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.
THANK YOU

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 5, 2024

Billed through 07/31/2024

Invoice# 009607 - 00007 - 248586 JHE

Karen Abrenavel and Peter Glass

Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

GREGORY S. JOHNSON V AVON PRODUCTS, INC
Civil Action#: 2023-CP-40-06819

Our file# 009607 -00007

Matter Summary

Total professional fees	\$104.00
Total of new charges billed	\$104.00
Plus net balance forward	\$573.00
<i>Total balance now due</i>	<u><u>\$677.00</u></u>

For Professional Services Rendered

07/31/2024 HME	Draft new deadline chart with pre-trial deadlines now that we have a trial date.	0.20 hrs
07/31/2024 HME	Email to Avon NCC and Avon Experts with new deadlines	0.10 hrs
07/31/2024 HME	Update trial deadline chart with pre-trial deadlines and email to client	0.20 hrs
07/31/2024 HME	At the request of Farah Nichol, review of file in order to update specific case information in KCIC	0.30 hrs
	Total fees for this matter	<u>\$104.00</u>

Expenses Incurred

Billing Summary

Elliott, Helen M	0.80	130.00 /hr	\$104.00
	Total fees for all Timekeepers		<u>\$104.00</u>
	Total expenses		\$0.00

Total of new charges for this invoice

\$104.00

* Prepaid cash remaining balance is \$0.00
** Trust account remaining balance is \$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.
THANK YOU

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 5, 2024

Billed through 07/31/2024

Invoice# 009607 - 00008 - 248587 JHE

Karen Abrenavel and Peter Glass
Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

ELIZABETH A. HOWARD V AVON PRODUCTS, INC.
Civil Action#: 2024CP4000458
Our file# 009607 -00008

Matter Summary

Total professional fees	\$39.00
Total of new charges billed	\$39.00
Plus net balance forward	\$2,064.00
<i>Total balance now due</i>	<u><u>\$2,103.00</u></u>

For Professional Services Rendered

07/31/2024 HME	At the request of Farah Nichol, review of file in order to update specific case information in KCIC	0.30 hrs
	Total fees for this matter	<u>\$39.00</u>

Expenses Incurred

Billing Summary

Elliott, Helen M	0.30	130.00 /hr	\$39.00
Total fees for all Timekeepers			<u>\$39.00</u>
Total expenses			\$0.00
<i>Total of new charges for this invoice</i>			<u><u>\$39.00</u></u>

* Prepaid cash remaining balance is \$0.00
** Trust account remaining balance is \$0.00

Avon Products, Inc.

Invoice# 248587
009607 00008

Page 2

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.
THANK YOU

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 5, 2024

Billed through 07/31/2024

Invoice# 009607 - 00009 - 248588 JHE

Karen Abrenavel and Peter Glass
Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

JACQUELINE CAMERON V AVON PRODUCTS, INC.
Civil Action#: 2024CP4001758
Our file# 009607 -00009

Matter Summary

Total professional fees	\$550.00
Total expenses incurred	\$219.76
Total of new charges billed	\$769.76
Plus net balance forward	\$905.00
Total balance now due	<u>\$1,674.76</u>

For Professional Services Rendered

07/17/2024 HME	Email from Plaintiff counsel tendering a date of deposition for Gina Cameron, Plaintiff's daughter	0.10 hrs
07/17/2024 HME	Email to Avon NCC regarding Plaintiff counsel tendering a date of deposition for Gina Cameron, Plaintiff's daughter and coverage	0.10 hrs
07/22/2024 JHE	Receipt and review of Playtex Products, LLC's Preliminary Designation of Fact and Expert Witnesses	0.20 hrs
07/22/2024 JHE	Receipt and review of Block Drug's Preliminary Designation of Fact and Expert Witnesses	0.20 hrs
07/22/2024 JHE	Receipt and review of Pfizer's Preliminary Designation of Fact and Expert Witnesses	0.20 hrs
07/22/2024 JHE	Receipt and review of Chattem Gold Bond's Preliminary Designation of Fact and Expert Witnesses	0.20 hrs

07/22/2024 JHE	Receipt and review of IMI Fabi's Preliminary Designation of Fact and Expert Witnesses	0.20 hrs
07/22/2024 JHE	Receipt and review of Colgate's Preliminary Designation of Fact and Expert Witnesses	0.20 hrs
07/23/2024 JHE	Receipt and review of Mennen Fact and Expert designations for possible impact on client.	0.20 hrs
07/31/2024 HME	Draft new deadline chart with pre-trial deadlines now that we have a trial date.	0.20 hrs
07/31/2024 HME	Email to Avon NCC and Avon Experts with new deadlines	0.10 hrs
07/31/2024 HME	Update trial deadline chart with pre-trial deadlines and email to client	0.20 hrs
07/31/2024 HME	At the request of Farah Nichol, review of file in order to update specific case information in KCIC	0.30 hrs
Total fees for this matter		\$550.00

Expenses Incurred

07/24/2024	Paszkievicz Court Reporting; E123 Court Reporter Cost for Discovery Zoom Connection fee Vol V Pro Rata	\$66.95
07/24/2024	Paszkievicz Court Reporting; E123 Court Reporter Cost for Discovery Zoom Connection fee Vol II Pro Rata	\$79.38
07/24/2024	Paszkievicz Court Reporting; E123 Court Reporter Cost for Discovery Zoom Connection fee for Jacqueline Cameron Pro Rata	\$73.43
Total expenses for this matter		\$219.76

Billing Summary

Elliott, Jr, James H	1.40	300.00 /hr	\$420.00
Elliott, Helen M	1.00	130.00 /hr	\$130.00
Total fees for all Timekeepers			\$550.00
Total expenses			\$219.76
Total of new charges for this invoice			\$769.76

Avon Products, Inc.

Invoice# 248588
009607 00009

Page 3

* Prepaid cash remaining balance is	\$0.00
** Trust account remaining balance is	\$0.00

Please include the INVOICE NUMBER on your remittance to ensure that all payments are properly credited.
THANK YOU

INVOICE

1 of 1

Paszkievicz Court Reporting
26 Ginger Creek Parkway
Glen Carbon, IL 62034
T: 618-307-9320 F: 618-310-0117

Invoice No.	Invoice Date	Job No.
340079	4/25/2024	54979
Job Date	Case No.	
3/29/2024	2024CP4001758	
Case Name		
Jacqueline Cameron v. Avon Productions, Inc., et al.		
Payment Terms		
Due upon receipt		

Cameron Berthelsen, Esq.
Richardson Plowden & Robinson
235 Magrath Darby Boulevard
Suite 100
Mount Pleasant, SC 29464

JACQUELINE CAMERON VOLUME V - DISCOVERY - ZOOM*
Connection Fee

1.00	133.90
TOTAL DUE >>>	\$133.90

THANK YOU. WE APPRECIATE YOUR BUSINESS.

(-) Payments/Credits:	0.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$133.90

Tax ID: 25-1906132

Please detach bottom portion and return with payment.

Cameron Berthelsen, Esq.
Richardson Plowden & Robinson
235 Magrath Darby Boulevard
Suite 100
Mount Pleasant, SC 29464

Invoice No. : 340079
Invoice Date : 4/25/2024
Total Due : \$133.90

Remit To: **Paszkievicz Court Reporting**
26 Ginger Creek Parkway
Glen Carbon, IL 62034

Job No. : 54979
BU ID : 2A ASB
Case No. : 2024CP4001758
Case Name : Jacqueline Cameron v. Avon Productions,
Inc., et al.

INVOICE

1 of 1

Paszkievicz Court Reporting
26 Ginger Creek Parkway
Glen Carbon, IL 62034
T: 618-307-9320 F: 618-310-0117

Invoice No.	Invoice Date	Job No.
339811	4/25/2024	54791
Job Date	Case No.	
3/26/2024	2024CP4001758	
Case Name		
Jacqueline Cameron v. Avon Productions, Inc., et al.		
Payment Terms		
Due upon receipt		

Cameron Berthelsen, Esq.
Richardson Plowden & Robinson
235 Magrath Darby Boulevard
Suite 100
Mount Pleasant, SC 29464

DEPOSITION RE:

JACQUELINE CAMERON VOLUME II - DISCOVERY - ZOOM*
Connection Fee

1.00	158.75
TOTAL DUE >>>	\$158.75

THANK YOU. WE APPRECIATE YOUR BUSINESS.

(-) Payments/Credits:	0.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$158.75

Tax ID: 25-1906132

Please detach bottom portion and return with payment.

Cameron Berthelsen, Esq.
Richardson Plowden & Robinson
235 Magrath Darby Boulevard
Suite 100
Mount Pleasant, SC 29464

Invoice No. : 339811
Invoice Date : 4/25/2024
Total Due : \$158.75

Remit To: **Paszkievicz Court Reporting**
26 Ginger Creek Parkway
Glen Carbon, IL 62034

Job No. : 54791
BU ID : 2A ASB
Case No. : 2024CP4001758
Case Name : Jacqueline Cameron v. Avon Productions,
Inc., et al.

INVOICE

1 of 1

Paszkievicz Court Reporting
26 Ginger Creek Parkway
Glen Carbon, IL 62034
T: 618-307-9320 F: 618-310-0117

Invoice No.	Invoice Date	Job No.
339766	4/25/2024	54579
Job Date	Case No.	
3/25/2024	2024CP4001758	
Case Name		
Jacqueline Cameron v. Avon Productions, Inc., et al.		
Payment Terms		
Due upon receipt		

Cameron Berthelsen, Esq.
Richardson Plowden & Robinson
235 Magrath Darby Boulevard
Suite 100
Mount Pleasant, SC 29464

DEPOSITION RE:

JACQUELINE CAMERON - DISCOVERY - ZOOM*
Connection Fee

1.00	146.85
TOTAL DUE >>>	\$146.85

THANK YOU. WE APPRECIATE YOUR BUSINESS.

(-) Payments/Credits:	0.00
(+) Finance Charges/Debits:	0.00
(=) New Balance:	\$146.85

Tax ID: 25-1906132

Please detach bottom portion and return with payment.

Cameron Berthelsen, Esq.
Richardson Plowden & Robinson
235 Magrath Darby Boulevard
Suite 100
Mount Pleasant, SC 29464

Invoice No. : 339766
Invoice Date : 4/25/2024
Total Due : \$146.85

Remit To: **Paszkievicz Court Reporting**
26 Ginger Creek Parkway
Glen Carbon, IL 62034

Job No. : 54579
BU ID : 2A ASB
Case No. : 2024CP4001758
Case Name : Jacqueline Cameron v. Avon Productions,
Inc., et al.

Richardson Plowden & Robinson, P.A.

P.O. Drawer 7788
Columbia, South Carolina 29202
(803) 771-4400
Federal ID #57-0954474
August 5, 2024

Billed through 07/31/2024

Invoice# 009607 - 00010 - 248589 JHE

Karen Abrenavel and Peter Glass

Avon Products, Inc.
1 Avon Place
Suffern, NY 10901

ROYA OWLAD GALLEHDAR and ABDUL HASSAN OWLAD
GALLEHDAR V AVON PRODUCTS, INC.

Civil Action#: 2024-cp-40-04185

Our file# 009607 -00010

Matter Summary

Total professional fees	\$39.00
Total of new charges billed	\$39.00
<i>Total balance now due</i>	<i>\$39.00</i>

For Professional Services Rendered

07/31/2024 HME	At the request of Farah Nichol, review of file in order to update specific case information in KCIC	0.30 hrs
Total fees for this matter		\$39.00

Expenses Incurred

Billing Summary

Elliott, Helen M	0.30	130.00 /hr	\$39.00
Total fees for all Timekeepers			\$39.00
Total expenses			\$0.00
Total of new charges for this invoice			\$39.00

* Prepaid cash remaining balance is \$0.00
 ** Trust account remaining balance is \$0.00

Avon Products, Inc.

Invoice# 248589
009607 00010

Page 2

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