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6 Attorneys for Plaintiffs

7
8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF FRESNO**

10 **KIM BELEMJIAN; JONATHAN**
11 **FAIRFIELD; T.J. JOHNSTON; MATTHEW**
12 **PIMENTEL; STANLEY ROY; FFLGUARD,**
INC.; CALIFORNIA RIFLE AND PISTOL
ASSOCIATION;

13 Plaintiffs,

14 vs.

15 **KAMALA D. HARRIS, in her official**
16 **capacity as Attorney General for the State of**
17 **California; STEPHEN LINDLEY, in his**
18 **official capacity as CHIEF OF THE**
CALIFORNIA DEPARTMENT OF JUSTICE
BUREAU OF FIREARMS; CALIFORNIA
19 **DEPARTMENT OF JUSTICE; and DOES 1 -**
10;

20 Defendants.

FILED

AUG 25 2015

FRESNO SUPERIOR COURT
By _____ CLERK DEPUTY

CASE NO. 15-CE-CG-00029

DECLARATION OF HAYDEE
VILLEGAS IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES; EXHIBIT B

Date: December 16, 2015
Time: 3:30 pm
Dept.: 503
Judge: Honorable Alan M. Simpson

Action Filed: January 6, 2015

1 **DECLARATION OF HAYDEE VILLEGAS**

2 I, Haydee Villegas, declare as follows:

3 1. I am the Office Manager of Michel & Associates, P.C., counsel of record for
4 Plaintiffs. I have personal knowledge of each fact stated in this declaration and, if called and
5 sworn as witness, could and would testify competently thereto.

6 2. All of the billing records in this matter are the business records of Michel &
7 Associates, P.C., and they are kept in the regular course of the firm's billing.

8 3. These records are prepared with the 2014 version of Sage Timeslips. Timeslips is a
9 software program that tracks time and expense entries using "slips." Slips are individual records
10 of each user's time and expense activities.

11 4. To create a slip, each billing professional uses the program to record the date, time
12 spent on each task, a description of the activities performed, and the identity of the client to be
13 billed. All billing professionals at Michel & Associates, P.C., including attorneys, law clerks, and
14 paralegals, are expected to enter their time on a daily basis to ensure fair and accurate billing.

15 5. I regularly use Timeslips to generate billing reports that indicate the date on which
16 each task was performed, the name of the billing professional who performed the task (i.e., the
17 timekeeper), a description of each task performed, and the amount of time spent on each task.

18 6. I then regularly route a billing report to the Michel & Associates, P.C., attorney
19 responsible for each billable matter (i.e., the "Responsible Attorney") to review to ensure that each
20 slip is billed to the correct client and matter and to determine if any hours should be "written off"
21 or "no charged."

22 7. Through this process, I scrutinize the billing records and make reductions for work
23 that appears duplicative or excessive, secretarial work and mixed secretarial/paralegal work,
24 regardless of who performed it, and entries that are vague or unclear as to the task performed.

25 8. On or about August 11, 2015, I used Timeslips to generate a report of all time
26 billed to this matter, and I routed that report to Anna M. Barvir, as the Responsible Attorney in
27 this matter, and Margaret E. Leidy, Ms. Barvir's law clerk, who together determined which further
28 hours and tasks would not be included as part of Plaintiffs' Motion for Attorneys' Fees. They then

1 directed me to remove such hours from the final billing report on which Plaintiffs' fee request was
2 based. At that time, under Ms. Barvir and Ms. Leidy's direction, I also created "project
3 references" with the Timeslips program in order to categorize each slip according to the project
4 for which each task described was performed.

5 9. On or about August 24, 2015, I used Timeslips to generate a final report of the
6 billing records on which Plaintiffs' fee request is based. The generated document includes a
7 detailed description of the work each billing professional performed on this case and the time
8 spent on each task between December 1, 2015, and June 1, 2015. Attached as Exhibit B, is a true
9 and accurate copy of the billing reports for which fee recovery is sought in this matter, redacted
10 only to protect attorney-client privileged information, work product, and attorneys' mental
11 impressions.

12 I declare under penalty of perjury under the laws of the State of California that the
13 forgoing is true and correct.

14 Executed August 24, 2015 at Long Beach, CA.

15 
16 Haydee Villegas
17 Declarant

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EXHIBIT B


MICHEL & ASSOCIATES, P.C.
Attorneys at Law

Date	Timekeeper	Description	Hours	Rate	Amount
12/11/2014	Silvoso	Draft letter to DOJ re: FSC/COE requirement.	0.70	\$ 300.00	\$ 210.00
12/15/2014	Michel	Telephone conference with JAS and [REDACTED] re: implementation of FSC; meet with JAS re: same.	0.70	\$ 395.00	\$ 276.50
12/15/2014	Silvoso	Telephone conference with CDM (for half the call) and [REDACTED] re: implementation of FSC; meet with CDM briefly after call re: same.	1.10	\$ 300.00	\$ 330.00
12/15/2014	Silvoso	Telephone conference with [REDACTED] re: FSC implementation.	0.50	\$ 300.00	\$ 150.00
12/17/2014	Michel	Exchange emails with JAS re: underground reg and FSC requirements.	0.40	\$ 395.00	\$ 158.00
12/17/2014	Silvoso	Conduct research re: underground reg and FSC requirements; e-mail [REDACTED] and CDM re: same.	2.80	\$ 300.00	\$ 840.00
12/17/2014	Silvoso	Conduct research re: underground regulation and options.	2.10	\$ 300.00	\$ 630.00
12/17/2014	Silvoso	Conduct research re: DOJ website for FSC information; e-mail CDM, [REDACTED] and [REDACTED]	0.40	\$ 300.00	\$ 120.00
12/18/2014	Silvoso	Meetings with MS re: OAL letter and FSC compliance.	0.60	\$ 300.00	\$ 180.00
12/18/2014	Silvoso	Send/receive email to/from [REDACTED] [REDACTED] [REDACTED] and CDM re: status of letter to OAL and teleconference.	0.30	\$ 300.00	\$ 90.00
12/19/2014	Michel	Telephone conference with MNS, JAS, [REDACTED], [REDACTED], [REDACTED] and [REDACTED] to discuss California Department of Justice's implementation of the Firearm Safety Certificate program [REDACTED]	1.60	\$ 395.00	\$ 632.00
12/19/2014	Silvoso	Telephone conference with K. Granger re: status of FSC and SSE.	0.10	\$ 300.00	\$ 30.00
12/19/2014	Silvoso	Telephone conference with MS, [REDACTED], [REDACTED], [REDACTED], [REDACTED] and CDM re: FSC requirements.	1.60	\$ 300.00	\$ 480.00
12/21/2014	Silvoso	Review/Revise letter to OAL.	1.60	\$ 300.00	\$ 480.00
12/22/2014	Silvoso	Telephone conference with [REDACTED] re: FSC requirements to take effect on Jan 1.	0.40	\$ 300.00	\$ 120.00
12/22/2014	Silvoso	Review/Revise letter to OAL re FSC regulations.	3.30	\$ 300.00	\$ 990.00
12/23/2014	Silvoso	Meeting with MS re: litigation strategy.	0.40	\$ 300.00	\$ 120.00
12/26/2014	Michel	Review and revise letter to California Department of Justice - Firearm Safety Certificate.	0.90	\$ 395.00	\$ 355.50
12/26/2014	Silvoso	Review/Revise letter to OAL re: FSC program.	3.70	\$ 300.00	\$ 1,110.00
12/26/2014	Silvoso	Send/receive email to/from [REDACTED], and [REDACTED] information re: FSC.	0.20	\$ 300.00	\$ 60.00
12/26/2014	Silvoso	Conduct research re: status and implementation of FSC.	0.40	\$ 300.00	\$ 120.00
12/27/2014	Silvoso	Review/Revise complaint for FSC; research FSC requirements and underground regulations.	5.90	\$ 300.00	\$ 1,770.00
12/29/2014	Barvir	Review, revise, re-draft Complaint for Declaratory and Injunctive Relief; conduct legal research as necessary.	2.60	\$ 250.00	\$ 650.00
12/29/2014	Barvir	Follow-up meeting with JAS re filing lawsuit against DOJ, K. Karris, and S. Lindley re underground regulations concerning Firearm Safety Certificate Program; discuss [REDACTED]	0.20	\$ 250.00	\$ 50.00
12/29/2014	Barvir	Receipt, review and analyze draft Complaint for Declaratory and Injunctive Relief; draft attorneys' notes re same and conduct research re substantive laws to be challenged as needed.	1.90	\$ 250.00	\$ 475.00
12/29/2014	Barvir	Meeting with JAS re filing lawsuit against DOJ, K. Karris, and S. Lindley re underground regulations concerning Firearm Safety Certificate Program; discuss drafting complaint and filing application for TRO as soon as possible.	0.20	\$ 250.00	\$ 50.00
12/29/2014	Barvir	Receipt, review and analyze draft Complaint for Declaratory and Injunctive Relief; draft attorneys' notes re same and conduct research re substantive laws to be challenged as needed.	1.00	\$ 250.00	\$ 250.00
12/29/2014	Barvir	Telephone conference with CDM re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; assign AMB task of preparing complaint and determine case strategy.	0.20	\$ 250.00	\$ 50.00
12/29/2014	Michel	Telephone conference with AMB re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; assign AMB task of preparing complaint and determine case strategy.	0.20	\$ 395.00	\$ 79.00
12/29/2014	Silvoso	Follow-up meeting with AMB re filing lawsuit against DOJ, K. Karris, and S. Lindley re underground regulations concerning Firearm Safety Certificate Program; discuss [REDACTED]	0.20	\$ 300.00	\$ 60.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/29/2014	Silvoso	Meeting with AMB re filing lawsuit against DOJ, K. Karris, and S. Lindley re underground regulations concerning Firearm Safety Certificate Program; discuss drafting complaint and filing application for TRO as soon as possible.	0.20	\$ 300.00	\$ 60.00
12/29/2014	Silvoso	Analyze DOJ letter from Barry Bauer re: implementation of FSC and meet with MS re: same.	0.60	\$ 300.00	\$ 180.00
12/29/2014	Silvoso	Review/Revise letter to OAL re: FSC and DOJ.	0.70	\$ 300.00	\$ 210.00
12/29/2014	Silvoso	Meetings with AMB re: FSC complaint, litigation strategy, and OAL letter.	0.70	\$ 300.00	\$ 210.00
12/30/2014	Barvir	Meet with MDC re Belemjian v. Harris complaint, temporary restraining order, and preliminary injunction.	0.20	\$ 250.00	\$ 50.00
12/30/2014	Barvir	Draft, review, and revise Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; conduct research re procedures and substantive law as necessary.	4.10	\$ 250.00	\$ 1,025.00
12/30/2014	Barvir	Meeting with SAB and JAS re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; discuss claims to bring, litigation strategy, and challenged laws and regulations.	0.80	\$ 250.00	\$ 200.00
12/30/2014	Barvir	Multiple meetings with SAB re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; discuss feasibility of petition for writ of mandate, litigation strategy, and seeking TRO.	1.00	\$ 250.00	\$ 250.00
12/30/2014	Barvir	Draft, review, and revise Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; conduct research re procedures and substantive law as necessary.	3.90	\$ 250.00	\$ 975.00
12/30/2014	Brady	Meetings with JAS re FSC law suit.	0.80	\$ 275.00	\$ 220.00
12/30/2014	Brady	Multiple meetings with AMB re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; discuss feasibility of petition for writ of mandate, litigation strategy, and seeking TRO.	1.00	\$ 275.00	\$ 275.00
12/30/2014	Cubeiro	Conduct legal research re writ of mandate re Belemjian v. Harris complaint.	1.30	\$ 125.00	\$ 162.50
12/30/2014	Cubeiro	Send email to or call potential plaintiffs in upcoming filing of Belemjian v. Harris complaint.	2.10	\$ 125.00	\$ 262.50
12/30/2014	Cubeiro	Meet with AMB re Belemjian v. Harris complaint, temporary restraining order, and preliminary injunction.	0.20	\$ 125.00	\$ 25.00
12/30/2014	Cubeiro	Draft statement of interest and membership standing for CRPA for upcoming filings in Belemjian v. Harris.	0.70	\$ 125.00	\$ 87.50
12/30/2014	Silvoso	Send/receive email to/from [REDACTED] re: [REDACTED].	0.40	\$ 300.00	\$ 120.00
12/30/2014	Silvoso	Meeting with MDC re: plaintiffs for FSC case.	0.10	\$ 300.00	\$ 30.00
12/30/2014	Silvoso	Conduct research re: status of pending regulations on OAL website.	0.30	\$ 300.00	\$ 90.00
12/30/2014	Silvoso	Telephone conference with [REDACTED] re: requirements for FSC.	0.70	\$ 300.00	\$ 210.00
12/30/2014	Silvoso	Send/receive email to/from K. Granger re: notice of TRO.	0.80	\$ 300.00	\$ 240.00
12/31/2014	Barvir	Draft, review, and revise Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; conduct research re procedures and substantive law as necessary.	8.10	\$ 250.00	\$ 2,025.00
12/31/2014	Barvir	Send/receive multiple emails to/from CDM, SAB, and JAS re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; discuss status and timeline for drafting, completing, and filing; also finalize list of claims; also discuss [REDACTED].	0.70	\$ 250.00	\$ 175.00
12/31/2014	Barvir	Telephone conference with SAB re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate.	0.20	\$ 250.00	\$ 50.00
12/31/2014	Brady	Telephone conference with AMB re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate.	0.20	\$ 275.00	\$ 55.00
12/31/2014	Brady	Receive and review and respond to correspondence from AMB re FSC complaint.	0.30	\$ 275.00	\$ 82.50
12/31/2014	Michel	Send/receive multiple emails to/from AMB, SAB, and JAS re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; discuss status and timeline for drafting, completing, and filing; also finalize list of claims; also discuss [REDACTED].	0.70	\$ 395.00	\$ 276.50
12/31/2014	Silvoso	Send/receive multiple emails to/from AMB, CDM, and SAB re Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; discuss status and timeline for drafting, completing, and filing; also finalize list of claims; [REDACTED].	0.70	\$ 300.00	\$ 210.00
1/1/2015	Brady	Analyze current draft of complaint and discuss with AMB and JAS re how to revise and general strategy for case.	3.30	\$ 275.00	\$ 907.50
1/2/2015	Barvir	Review and revise Application for TRO/OSC; revise and format declarations in support; insert MEL and SAB suggested edits; finalize document for filing; route to LLQ.	2.90	\$ 250.00	\$ 725.00
1/2/2015	Barvir	Draft, review, and revise Complaint for Declaratory and Injunctive Relief and Petition for Writ of Mandate; conduct research re procedures and substantive law as necessary.	4.50	\$ 250.00	\$ 1,125.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/2/2015	Barvir	Multiple meetings with SAB and CDM re notice requirement and issues raised by opposing counsel re ex parte TRO hearing; discussed also litigation strategy.	0.50	\$ 250.00	\$ 125.00
1/2/2015	Barvir	Send/receive multiple emails to/from MDC re status of gathering plaintiffs for FSC challenge; meetings with MDC re same.	0.50	\$ 250.00	\$ 125.00
1/2/2015	Barvir	Multiple meetings with CDM re litigation strategy; discuss claims and arguments to raise; discuss also timeline and remedies to seek.	0.30	\$ 250.00	\$ 75.00
1/2/2015	Brady	Conduct analysis with team re arguments for TRO.	0.30	\$ 275.00	\$ 82.50
1/2/2015	Brady	Receive and review and respond to correspondence from opposing counsel re dispute over notice for TRO and conduct related research and analysis with team re such.	1.00	\$ 275.00	\$ 275.00
1/2/2015	Brady	Multiple meetings with CDM and AMB re notice requirement and issues raised by opposing counsel re ex parte TRO hearing; discussed also litigation strategy.	0.50	\$ 275.00	\$ 137.50
1/2/2015	Cubeiro	Draft statement of plaintiffs for Belemijian v. Harris case challenging Firearm Safety Certificate regulations.	3.20	\$ 125.00	\$ 400.00
1/2/2015	Cubeiro	Telephone conference with potential plaintiffs for Belemijian v. Harris Firearm Safety Certificate lawsuit.	1.00	\$ 125.00	\$ 125.00
1/2/2015	Cubeiro	Telephone conference with M. Pimentel re participation as plaintiff in Belemijian v. Harris case challenging Firearm Safety Certificate regulations.	0.60	\$ 125.00	\$ 75.00
1/2/2015	Michel	Multiple meetings with AMB re litigation strategy; discuss claims and arguments to raise; discuss also timeline and remedies to seek.	0.30	\$ 395.00	\$ 118.50
1/2/2015	Michel	Multiple meetings with SAB and AMB re notice requirement and issues raised by opposing counsel re ex parte TRO hearing; discussed also litigation strategy.	0.50	\$ 395.00	\$ 197.50
1/3/2015	Barvir	Draft, review, and revise Application for Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction; conduct legal research as necessary.	5.40	\$ 250.00	\$ 1,350.00
1/4/2015	Barvir	Multiple meetings with SAB re Verified Complaint for Declaratory and Injunctive Relief and Writ of Mandate; discuss and finalize claims to pursue and arguments in support; also discuss Application for TRO/OSC and supporting documentation, including proposed orders; research and forward examples of same to SAB for review.	0.40	\$ 250.00	\$ 100.00
1/4/2015	Barvir	Send/receive multiple emails to/from SAB re Verified Complaint for Declaratory and Application for TRO/OSC; discuss challenged regulations and statutory sections.	0.20	\$ 250.00	\$ 50.00
1/4/2015	Barvir	Draft Application for TRO/OSC and supporting documents; conduct legal research as necessary.	5.40	\$ 250.00	\$ 1,350.00
1/4/2015	Barvir	Review and revise Verified Complaint for Declaratory and Injunctive Relief and Writ of Mandate; conduct legal research re same; route to SAB for review, revision, and comment.	4.20	\$ 250.00	\$ 1,050.00
1/4/2015	Brady	Review/Revise order to show cause.	0.20	\$ 275.00	\$ 55.00
1/4/2015	Brady	Analyze issues re strategy for TRO with AMB.	0.60	\$ 275.00	\$ 165.00
1/4/2015	Brady	Review/Revise brief in support of TRO.	1.30	\$ 275.00	\$ 357.50
1/4/2015	Brady	Review/Revise proposed order granting TRO.	0.20	\$ 275.00	\$ 55.00
1/4/2015	Brady	Draft declaration in support of TRO.	0.30	\$ 275.00	\$ 82.50
1/5/2015	Barvir	Multiple emails to/from MDC re Application for TRO/OSC; assign MDC tasks re preparation of plaintiffs' declarations in support.	0.20	\$ 250.00	\$ 50.00
1/5/2015	Barvir	Review/Revise Verified Complaint and Petition for Writ of Mandate; review, approve, and insert SAB's suggested edits; revise discrete sections of complaint as needed; draft verification form; prepare exhibits in support Complaint; PDF document and route to SAB and S. Dember for verification; route to LLQ for final formatting.	3.20	\$ 250.00	\$ 800.00
1/5/2015	Barvir	Multiple emails to/from MDC re Verified Complaint and Petition for Writ of Mandate; discuss status of confirming plaintiffs and statements re each plaintiff for Complaint.	0.30	\$ 250.00	\$ 75.00
1/5/2015	Barvir	Multiple emails to/from SAB and JAS re Verified Complaint and Petition for Writ of Mandate; [REDACTED]	0.10	\$ 250.00	\$ 25.00
1/5/2015	Barvir	Review/Revise Memorandum of Points and Authorities in Support of Application for TRO/OSC; receive, review, and analyze SAB draft sections of memorandum re safe-handling demonstration; revise as necessary and incorporate into brief.	1.80	\$ 250.00	\$ 450.00
1/5/2015	Barvir	Draft, review, and revise Memorandum of Points and Authorities in Support of Application for TRO/OSC; conduct legal research as necessary; multiple meetings with SAB re same; assign SAB discrete drafting tasks re same.	5.20	\$ 250.00	\$ 1,300.00
1/5/2015	Barvir	Meeting with MEL re facts of case; research assignment to draft Proposed Order to Show Cause and Proposed Temporary Restraining Order.	1.30	\$ 250.00	\$ 325.00
1/5/2015	Brady	Review/Revise complaint.	1.40	\$ 275.00	\$ 385.00
1/5/2015	Brady	Conduct correspondence with plaintiffs re their declarations in support of TRO.	0.50	\$ 275.00	\$ 137.50
1/5/2015	Brady	Review/Revise application for TRO and draft section thereof.	0.50	\$ 275.00	\$ 137.50

Date	Timekeeper	Description	Hours	Rate	Amount
1/5/2015	Brady	Oversee staff obtaining declarations in support of TRO and confirming procedure has been complied with.	0.60	\$ 275.00	\$ 165.00
1/5/2015	Brady	Review/Revise brief in support of TRO and analyze issues with AMB.	3.00	\$ 275.00	\$ 825.00
1/5/2015	Leidy	Review/Revise case citations in Plaintiffs' Application for Order to Show Cause and Temporary Restraining Order.	3.80	\$ 125.00	\$ 475.00
1/5/2015	Leidy	Meeting with AMB re facts about Belemjian v. Harris; research assignment to draft Proposed Order to Show Cause and Proposed Temporary Restraining Order.	1.30	\$ 125.00	\$ 162.50
1/5/2015	Quesada	Telephone conference with Fresno Superior Court re ex parte hearing re TRO and department assignment; meet with SAB and AMB re same.	0.20	\$ 100.00	\$ 20.00
1/5/2015	Quesada	Send/receive email to/from Mr. Dember with Belemjian v Harris with word perfect version of Complaint asking him to sign and return Verification.	0.10	\$ 100.00	\$ 10.00
1/5/2015	Quesada	Draft Summons, Civil Cover Sheet, for Belemjian v Harris filing in Fresno Superior Court; research Fresno Local Rules to see if there is an additional civil cover sheet that needs to be filed in Fresno Superior Court; give drafts to AMB for review; make revisions to Summons (3) and Civil Cover Sheet per AMB edits.	1.40	\$ 100.00	\$ 140.00
1/6/2015	Barvir	Prepare all materials for TRO/OSC ex parte hearings; create outlines and prepare documents and materials for review before and during hearing.	2.10	\$ 250.00	\$ 525.00
1/6/2015	Barvir	Assist LLQ with finalizing Application for TRO/OSC and all supporting documents for filing; address document and filing issues with LLQ as they arise; review, revise, and finalize memorandum and tables as necessary.	0.60	\$ 250.00	\$ 150.00
1/6/2015	Barvir	Send/receive multiple emails to/from SAB and MDC re status of preparing proposed orders re TRO and OSC; assign MDC tasks re same.	0.10	\$ 250.00	\$ 25.00
1/6/2015	Barvir	Send/receive multiple emails to/from MEL re citations to be included in Memorandum Supporting Application for TRO/OSC.	0.20	\$ 250.00	\$ 50.00
1/6/2015	Barvir	Multiple meetings with SAB, MEL, and LLQ re issues re serving TRO/OSC Application and supporting documents; conduct research re same and prepare proof of service documents for various forms of service.	0.60	\$ 250.00	\$ 150.00
1/6/2015	Barvir	Send/receive multiple emails to/from SAB, MDC, and LLQ re status of all signed plaintiffs' declarations for TRO/OSC.	0.20	\$ 250.00	\$ 50.00
1/6/2015	Barvir	Send/receive multiple emails to/from MDC and MEL re confirming compliance with all procedural rules for TRO/OSC.	0.20	\$ 250.00	\$ 50.00
1/6/2015	Barvir	Review/revise Application for TRO/OSC and all supporting documents; review/revise all plaintiffs' declarations; incorporate signed declarations into applications; insert all suggested edits from SAB and citation edits from MEL; revise discrete sections of brief and finalize drafting of sections re irreparable harm to plaintiffs; review/revise proposed orders re TRO and OSC; and prepare all exhibits; route all documents to LLQ for formatting and filing.	3.80	\$ 250.00	\$ 950.00
1/6/2015	Barvir	Meeting with MEL to revise and add case citations in Plaintiffs' Application for Order to Show Cause and Temporary Restraining Order.	1.30	\$ 250.00	\$ 325.00
1/6/2015	Brady	Review/Revise application for TRO.	0.40	\$ 275.00	\$ 110.00
1/6/2015	Brady	Review/Revise declaration in support for TRO.	0.40	\$ 275.00	\$ 110.00
1/6/2015	Brady	Preparation for hearing on TRO with AMB.	1.50	\$ 275.00	\$ 412.50
1/6/2015	Leidy	Conduct legal research re case law to use in Application for TRO/OSC..	1.50	\$ 125.00	\$ 187.50
1/6/2015	Leidy	Review/Revise case citations; proofread; and final revisions to Plaintiffs' Application for Order to Show Cause and Temporary Restraining Order.	4.00	\$ 125.00	\$ 500.00
1/7/2015	Barvir	Prepare for and attend TRO/OSC ex parte hearing.	2.50	\$ 250.00	\$ 625.00
1/7/2015	Barvir	Meeting with SAB and ██████████ re TRO/OSC ex parte hearing; discuss ██████████; also discuss ██████████	0.50	\$ 250.00	\$ 125.00
1/7/2015	Barvir	Travel to Stanton from Fresno for TRO/OSC ex parte hearing.	4.50	\$ 250.00	\$ 1,125.00
1/7/2015	Barvir	Travel to Fresno from Stanton for TRO/OSC ex parte hearing.	5.10	\$ 250.00	\$ 1,275.00
1/7/2015	Brady	Travel to and from Fresno court for hearing re TRO for DOJ enforcement of unlawful regulations and statute concerning firearm transfers with AMB; telephone conferences with ██████████, CDM, and JAS re strategy for potential courses of action in light of court ruling on TRO; and perform analysis re such with AMB.	9.50	\$ 275.00	\$ 2,612.50
1/7/2015	Brady	Attend hearing in Fresno court re TRO for DOJ enforcement of unlawful regulations and statute concerning firearm transfers with AMB; preparation therefore; and discussion with potential witnesses thereafter.	3.00	\$ 275.00	\$ 825.00
1/8/2015	Barvir	Meeting with MEL and JRD re causes of action to use regarding safe-handling law to use in amended complaint.	0.40	\$ 250.00	\$ 100.00
1/8/2015	Barvir	Meeting with MEL re research assignments to help file amended complaint and TRO application.	0.30	\$ 250.00	\$ 75.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/8/2015	Barvir	Send/receive email to/from SAB and [REDACTED]	0.10	\$ 250.00	\$ 25.00
1/8/2015	Barvir	Send/receive multiple emails to/from CDM, SAB and J. Rich re party dispute over proposed order re TRO/OSC; meetings with SAB re same.	0.50	\$ 250.00	\$ 125.00
1/8/2015	Barvir	Receipt, review and analyze draft transcript of TRO/OSC hearing; forward relevant portions re court order denying application without prejudice to SAB for use in correspondence with opposing counsel.	0.40	\$ 250.00	\$ 100.00
1/8/2015	Barvir	Send/receive email to/from CDM, SAB and J. Rich re offer to engage in settlement proceedings; discuss also issues re attorney's fee recovery, admissible evidence of irreparable harm supporting preliminary relief, and other matters; conduct research re same; meeting with SAB re same.	0.40	\$ 250.00	\$ 100.00
1/8/2015	Barvir	Conduct research re availability of alternative dispute resolution in Fresno Superior Court; route findings to SAB for review and use in correspondence to opposing counsel.	0.30	\$ 250.00	\$ 75.00
1/8/2015	Barvir	Prepare for and attend telephone conference with CDM, CBM, and SAB re case status, denial of TRO/OSC, and future action/case strategy.	0.40	\$ 250.00	\$ 100.00
1/8/2015	Barvir	Meeting with MEL re re causes of action to use regarding safe-handling law to use in amended complaint.	1.00	\$ 250.00	\$ 250.00
1/8/2015	Brady	Receive and review and respond to correspondence from opposing counsel re position of defendants in proceeding with litigation.	0.50	\$ 275.00	\$ 137.50
1/8/2015	Brady	Analyze strategy with AMB for proceeding with lawsuit in light of response from court to TRO.	0.80	\$ 275.00	\$ 220.00
1/8/2015	Brady	Analyze strategy with CDM, CBM, and AMB.	0.40	\$ 275.00	\$ 110.00
1/8/2015	Brady	Draft correspondence to counsel for DOJ re how to proceed in this matter in light of the court's comments at the TRO hearing and conduct related correspondence with litigation team.	1.00	\$ 275.00	\$ 275.00
1/8/2015	Leidy	Meeting with AMB re causes of action to use regarding safe-handling law to use in amended complaint.	1.00	\$ 125.00	\$ 125.00
1/8/2015	Leidy	Meeting with AMB and JRD re causes of action to use regarding safe-handling law to use in amended complaint.	0.40	\$ 125.00	\$ 50.00
1/8/2015	Leidy	Meeting with AMB re research assignments to help file amended complaint and TRO application.	0.30	\$ 125.00	\$ 37.50
1/8/2015	Leidy	Conduct legal research re causes of action to use regarding safe-handling law to use in amended complaint.	3.60	\$ 125.00	\$ 450.00
1/8/2015	Leidy	Meeting with AMB re re causes of action to use regarding safe-handling law to use in amended complaint.	1.00	\$ 125.00	\$ 125.00
1/8/2015	Michel	Send/receive email to/from AMB, SAB and J. Rich re offer to engage in settlement proceedings; discuss also issues re attorney's fee recovery, admissible evidence of irreparable harm supporting preliminary relief, and other matters; conduct research re same; meeting with SAB re same.	0.40	\$ 395.00	\$ 158.00
1/8/2015	Quesada	Preparation of Complaint, Summons, Notice of Case Management Conference, Ex Parte Application for TRO and Proposed TRO to Attorney General and Department of Justice; research and meeting with AMB, CA and MEL re service; telephone call to Nationwide re service; email to Nationwide providing PDF of documents to serve on Kamala Harris; Stephen Lindley and DOJ.	1.50	\$ 100.00	\$ 150.00
1/9/2015	Barvir	Send/receive multiple emails to/from JAS re potential declarants re practical problems with implementation of FSC Program underground regulations; route to MDC for follow up with each declarant.	0.30	\$ 250.00	\$ 75.00
1/9/2015	Barvir	Send/receive multiple emails to/from MDC re case status update email to all plaintiffs; send feedback to MDC re same.	0.10	\$ 250.00	\$ 25.00
1/9/2015	Barvir	Meeting with SAB and JAS re Defendants' letter declining to participate in alternative resolution, informing of intention to file emergency regulations, and position re denial of TRO without prejudice; discuss position re Defendants' intention to promulgate emergency regulations.	0.20	\$ 250.00	\$ 50.00
1/9/2015	Barvir	Meeting with MEL re scope of bringing a claim for declaratory relief to aid in drafting Amended Complaint.	0.90	\$ 250.00	\$ 225.00
1/9/2015	Barvir	Meeting with MEL re declaratory relief cause of action to add to the Amended Complaint.	0.50	\$ 250.00	\$ 125.00
1/9/2015	Barvir	Receipt, review and analyze Defendants' letter declining to participate in alternative resolution, informing of intention to file emergency regulations, and position re denial of TRO without prejudice; draft attorney's notes re same.	0.30	\$ 250.00	\$ 75.00
1/9/2015	Barvir	Telephone conference with SAB and CDM re litigation strategy, amending complaint and seeking further preliminary relief.	0.30	\$ 250.00	\$ 75.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/9/2015	Barvir	Prepare for and attend telephone conference with JAS and [REDACTED] re litigation status and strategy; discuss also [REDACTED] preliminary relief.	1.20	\$ 250.00	\$ 300.00
1/9/2015	Brady	Telephone conference with [REDACTED] and [REDACTED] re impacts of FSC to include in case in light of response from DOJ re its response to litigation.	0.50	\$ 275.00	\$ 137.50
1/9/2015	Brady	Meeting with AMB and JAS re Defendants' letter declining to participate in alternative resolution, informing of intention to file emergency regulations, and position re denial of TRO without prejudice; discuss position re Defendants' intention to promulgate emergency regulations.	0.20	\$ 275.00	\$ 55.00
1/9/2015	Brady	Telephone conference with CDM and AMB re litigation strategy.	0.30	\$ 275.00	\$ 82.50
1/9/2015	Brady	Receipt, review and analyze response from DOJ re its response to offer to settle in light of outcome of TRO application, discuss with team, and prepare response thereto.	1.00	\$ 275.00	\$ 275.00
1/9/2015	Cubeiro	Telephone conference with various FFLs and individual instructors re current impact of SB 683 on firearm transactions.	3.00	\$ 125.00	\$ 375.00
1/9/2015	Leidy	Meeting with AMB re scope of bringing a claim for declaratory relief to aid in drafting Amended Complaint.	0.90	\$ 125.00	\$ 112.50
1/9/2015	Leidy	Conduct legal research re scope of bringing a claim for declaratory relief to aid in drafting Amended Complaint.	1.80	\$ 125.00	\$ 225.00
1/9/2015	Leidy	Meeting with AMB re declaratory relief cause of action to add to the Amended Complaint.	0.50	\$ 125.00	\$ 62.50
1/9/2015	Leidy	Draft Cause of Action for Declaratory Relief section in the Amended Complaint.	0.30	\$ 125.00	\$ 37.50
1/9/2015	Michel	Telephone conference with SAB and AMB re litigation strategy, amending complaint and seeking further preliminary relief.	0.30	\$ 395.00	\$ 118.50
1/9/2015	Silvoso	Telephone conference with AMB and [REDACTED] re: [REDACTED]	0.90	\$ 300.00	\$ 270.00
1/12/2015	Barvir	Send/receive multiple emails to/from MEL, SAB, and LLQ re proposed order from opposing counsel re denial of TRO/OSC without prejudice to filing motion for preliminary injunction; discuss opposition efforts and submission of written objection.	0.20	\$ 250.00	\$ 50.00
1/12/2015	Barvir	Meeting with MEL re draft letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	0.70	\$ 250.00	\$ 175.00
1/12/2015	Barvir	Review/revise letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	2.00	\$ 250.00	\$ 500.00
1/12/2015	Barvir	Receipt, review and analyze letter and proposed order from opposing counsel re denial of TRO/OSC without prejudice to filing motion for preliminary injunction; draft attorney's notes re appropriate response.	0.60	\$ 250.00	\$ 150.00
1/12/2015	Barvir	Receive/review/analyze MEL memoranda re research re procedures for written letter objecting to proposed order as drafted by opposing counsel; draft attorney's notes re same.	0.60	\$ 250.00	\$ 150.00
1/12/2015	Barvir	Send/receive multiple emails to/from MEL and SAB re written letter objecting to proposed order as drafted by opposing counsel; discuss also [REDACTED]	0.20	\$ 250.00	\$ 50.00
1/12/2015	Cubeiro	Email individuals and FFLs regarding implementation of Firearm Safety Certificate program; Conduct interviews to gather information regarding program and any problems since its launch.	0.10	\$ 125.00	\$ 12.50
1/12/2015	Leidy	Meeting with AMB re draft letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	0.70	\$ 125.00	\$ 87.50
1/12/2015	Leidy	Review/Revise letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	1.00	\$ 125.00	\$ 125.00
1/12/2015	Leidy	Conduct legal research re applicable rules re filing an emergency regulation to respond to opposing counsel's January 9, 2015 letter.	1.30	\$ 125.00	\$ 162.50
1/13/2015	Barvir	Telephone conference with SAB re suggested revisions to letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	0.10	\$ 250.00	\$ 25.00
1/13/2015	Barvir	Send/receive multiple emails to/from CDM re Plaintiffs disapproval of Defendants' Proposed Order.	0.20	\$ 250.00	\$ 50.00
1/13/2015	Barvir	Telephone conference with SAB re revising letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order per receipt of final draft of transcript showing that court denied TRO without prejudice to refile the TRO application; discuss also sending correspondence to J. Rich re same.	0.10	\$ 250.00	\$ 25.00
1/13/2015	Barvir	Review/revise letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order; also revise to include updated final transcript quotes; edit argument accordingly; conduct final proofreads and prepare to send to opposing counsel via email; route to LLQ for overnight mailing.	3.80	\$ 250.00	\$ 950.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/13/2015	Barvir	Draft correspondence to J. Rich re Plaintiffs disapproval of Defendants' Proposed Order; discuss edits to final transcript showing that court denied TRO without prejudice to refile the TRO application; receive email from J. Rich re same.	0.50	\$ 250.00	\$ 125.00
1/13/2015	Barvir	Send/receive multiple emails to/from SAB re suggested revisions to letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	0.20	\$ 250.00	\$ 50.00
1/13/2015	Barvir	Send/receive multiple emails to/from MEL re edits to Plaintiffs disapproval of Defendants' Proposed Order.	0.20	\$ 250.00	\$ 50.00
1/13/2015	Barvir	Receive, review, and analyze Final Draft of Reporter's Transcript re TRO/OSC Hearing; draft attorney's notes and determine usefulness for preparing Plaintiffs' Disapproval Re Defendants' Proposed Order.	0.20	\$ 250.00	\$ 50.00
1/13/2015	Barvir	Meeting with MEL re Response to opposing counsel's January 9, 2015 Letter re mootness of claims due to pending emergency regulations.	0.70	\$ 250.00	\$ 175.00
1/13/2015	Brady	Conduct correspondence with AMB re responding to DOJ's proposed order.	0.50	\$ 275.00	\$ 137.50
1/13/2015	Brady	Telephone conference with AMB re revising letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order per receipt of final draft of transcript showing that court denied TRO without prejudice to refile the TRO application; discuss also sending correspondence to J. Rich re same.	0.10	\$ 275.00	\$ 27.50
1/13/2015	Brady	Telephone conference with AMB re suggested revisions to letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	0.10	\$ 275.00	\$ 27.50
1/13/2015	Cubeiro	Research additional potential declarants and contact for information regarding implementation of Firearm Safety Certificate program.	1.80	\$ 125.00	\$ 225.00
1/13/2015	Leidy	Review/Revise draft letter to opposing counsel re Plaintiffs disapproval of Defendants' Proposed Order.	1.50	\$ 125.00	\$ 187.50
1/13/2015	Leidy	Meeting with AMB re Response to opposing counsel's January 9, 2015 Letter re mootness of claims due to pending emergency regulations.	0.70	\$ 125.00	\$ 87.50
1/13/2015	Michel	Send/receive multiple emails to/from AMB re Plaintiffs disapproval of Defendants' Proposed Order.	0.20	\$ 395.00	\$ 79.00
1/14/2015	Brady	Conduct correspondence re status of case with opposing counsel and litigation team.	0.30	\$ 275.00	\$ 82.50
1/14/2015	Cubeiro	Prepare declaration drafts for contacted FFLs for support of temporary restraining order or preliminary injunction; Review transcripts of hearing for additional points to raise.	4.40	\$ 125.00	\$ 550.00
1/15/2015	Barvir	Receipt, review and analyze MDC drafts of declarations in support of TRO or preliminary injunction; draft notes re potential edits.	0.20	\$ 250.00	\$ 50.00
1/15/2015	Barvir	Receipt, review and analyze letter from Defendants to Judge Hamilton re proposed order denying TRO application; determine whether further opposition is necessary.	0.10	\$ 250.00	\$ 25.00
1/15/2015	Cubeiro	Send email to individual FFLs previously contacted re firearm safety certificate program to begin preparing declarations in support of TRO or preliminary injunction.	0.20	\$ 125.00	\$ 25.00
1/15/2015	Quesada	Receipt, review and analyze letter from defense counsel to Judge Hamilton enclosing proposed order with Plaintiff's Objections; file on internal case docket.	0.10	\$ 100.00	\$ 10.00
1/16/2015	Barvir	Send/receive email to/from JAS and SAB re whether DOJ has announced emergency regulations; discuss also whether to prepare another TRO application or motion for preliminary injunction in light of DOJ's failure to begin emergency process.	0.10	\$ 250.00	\$ 25.00
1/17/2015	Brady	Analyze strategy with JAS for approaching DOJ re opening rulemaking process or filing another TRO/ Motion for Preliminary Injunction.	0.20	\$ 275.00	\$ 55.00
1/20/2015	Brady	Conduct correspondence re status of case and strategy for proceeding with lawsuit.	0.40	\$ 275.00	\$ 110.00
1/23/2015	Barvir	Telephone conference with LLQ re sending copies of proofs of service to J. Rich.	0.10	\$ 250.00	\$ 25.00
1/23/2015	Barvir	Send/receive multiple emails to/from J. Rich re date of service on defendants; also direct LLQ to forward proofs of service to J. Rich.	0.20	\$ 250.00	\$ 50.00
1/23/2015	Quesada	Send email to J. Rich attaching Proofs of Service of Summons, Complaint, etc on all Defendants; cc CDM, SAB and AMB.	0.10	\$ 100.00	\$ 10.00
1/26/2015	Barvir	Send/receive multiple emails to/from SAB re drafting and sending correspondence to opposing counsel re status of seeking emergency regulations.	0.20	\$ 250.00	\$ 50.00
1/26/2015	Barvir	Meeting with LLQ re status of court issuing order denying TRO/OSC without prejudice; direct LLQ to contact court clerk re same; review docket re same.	0.20	\$ 250.00	\$ 50.00
1/26/2015	Barvir	Send/receive multiple emails to/from JAS re status of DOJ initiating emergency rulemaking procedures.	0.10	\$ 250.00	\$ 25.00
1/26/2015	Brady	Send/receive multiple emails to/from AMB re drafting and sending correspondence to opposing counsel re status of seeking emergency regulations.	0.20	\$ 275.00	\$ 55.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/26/2015	Brady	Meeting with CDM, JRD, JAS, and AMB re strategy for case and analyze issues raised therein with AMB in determining how best to proceed.	0.70	\$ 275.00	\$ 192.50
1/26/2015	Cubeiro	Send email to potential declarant FFLs re status of declaration draft and case.	0.10	\$ 125.00	\$ 12.50
1/27/2015	Brady	Review/Revise notice of filing of proof of service.	0.10	\$ 275.00	\$ 27.50
1/27/2015	Brady	Conduct correspondence re strategy for proceeding with case with litigation team.	0.10	\$ 275.00	\$ 27.50
1/27/2015	Quesada	Review/Revise Notice of Filing Proof of Service of Verified Complaint and Summons on Defendant Kamala D. Harris; draft same for Stephen Lindley and California Department of Justice.	0.70	\$ 100.00	\$ 70.00
1/27/2015	Quesada	Review/Revise Notice of Filing Proof of Service of Verified Complaint and Summons on Defendant Kamala Harris, Stephen Lindley and California Department of Justice; email to process server to file with Fresno Superior Court; telephone call with Eddings Attorney service to confirm that Notices will be filed today; mailing of Notices to statutory agent.	0.60	\$ 100.00	\$ 60.00
1/28/2015	Barvir	Meet with MDC re status of case; Discuss next steps re motion for preliminary injunction; Discuss emergency regulations to be drafted by CA DOJ.	0.10	\$ 250.00	\$ 25.00
1/28/2015	Barvir	Send/receive emails to/from CDM and SAB re status of court issuing signed order re denial of TRO/OSC.	0.10	\$ 250.00	\$ 25.00
1/28/2015	Barvir	Meet with SAB re status of case and litigation strategy; discuss email from J. Rich re timeline for promulgating "emergency" regulations; discuss and brainstorm potential options for temporary relief or final disposition of case in light of recent developments.	1.10	\$ 250.00	\$ 275.00
1/28/2015	Barvir	Send/receive emails to/from CDM and SAB re status of case and litigation strategy; set meeting to discuss same.	0.10	\$ 250.00	\$ 25.00
1/28/2015	Barvir	Meeting with MDC to discuss motion for preliminary injunction notice requirement and motion to shorten time; Discuss case strategy and assignments re motion for preliminary injunction and motion to shorten time.	1.00	\$ 250.00	\$ 250.00
1/28/2015	Barvir	Receive email from J. Rich re status of promulgating emergency regulations re FSC Program; send/receive multiple emails to/from SAB and CDM re same; discuss also litigation strategy.	0.20	\$ 250.00	\$ 50.00
1/28/2015	Brady	Meet with AMB re status of case and litigation strategy; discuss email from J. Rich re timeline for promulgating "emergency" regulations; discuss and brainstorm potential options for temporary relief or final disposition of case in light of recent developments.	1.10	\$ 275.00	\$ 302.50
1/28/2015	Brady	Analyze strategy for proceeding with litigation with team and prepare draft response to opposing counsel re such.	1.30	\$ 275.00	\$ 357.50
1/28/2015	Cubeiro	Meeting with AMB to discuss motion for preliminary injunction notice requirement and motion to shorten time; Discuss case strategy and assignments re motion for preliminary injunction and motion to shorten time.	1.00	\$ 125.00	\$ 125.00
1/28/2015	Michel	Send/receive emails to/from AMB and SAB re status of court issuing signed order re denial of TRO/OSC.	0.10	\$ 395.00	\$ 39.50
1/28/2015	Michel	Send/receive emails to/from AMB and SAB re status of case and litigation strategy; set meeting to discuss same.	0.10	\$ 395.00	\$ 39.50
1/29/2015	Barvir	Meeting with CDM, JRD, JAS, and SAB re case status and litigation strategy; discuss amending complaint, filing for temporary injunctive relief and sending correspondence to opposing counsel re same; also discuss seeking shortened notice period.	0.40	\$ 250.00	\$ 100.00
1/29/2015	Barvir	Send/receive emails to/from MEL re draft sections of First Amended Complaint; receive, review, analyze draft causes of action; conduct research re same.	0.40	\$ 250.00	\$ 100.00
1/29/2015	Barvir	Draft Motion for Preliminary Injunction; conduct legal research re same as necessary.	1.10	\$ 250.00	\$ 275.00
1/29/2015	Barvir	Meeting with MDC re drafting SAB and AMB declarations in support of ex parte motion to shorten time re notice re preliminary injunction motion; research and forward all communications with opposing counsel indicating why shortened time is necessary.	0.50	\$ 250.00	\$ 125.00
1/29/2015	Barvir	Draft First Amended Complaint; conduct legal research re same as necessary.	2.50	\$ 250.00	\$ 625.00
1/29/2015	Barvir	Send/receive multiple emails to/from SAB re communications with opposing counsel re settling out of court and/or timeline for emergency regulations.	0.10	\$ 250.00	\$ 25.00
1/29/2015	Brady	Send/receive multiple emails to/from AMB re communications with opposing counsel re settling out of court and/or timeline for emergency regulations.	0.10	\$ 275.00	\$ 27.50
1/29/2015	Brady	Meeting with CDM, AMB, and JAS re strategy for proceeding.	0.40	\$ 275.00	\$ 110.00
1/29/2015	Cubeiro	Draft motion for order to shorten time for preliminary injunction.	2.50	\$ 125.00	\$ 312.50
1/29/2015	Cubeiro	Meet with AMB and MEL to discuss status of case; Prepare motion for order to shorten time for motion for preliminary injunction.	1.00	\$ 125.00	\$ 125.00
1/29/2015	Leidy	Draft causes of action for declaratory relief and second amendment violations to add to the Amended Complaint.	1.10	\$ 125.00	\$ 137.50

Date	Timekeeper	Description	Hours	Rate	Amount
1/29/2015	Michel	Meeting with AMB, JRD, JAS, and SAB re case status and litigation strategy; discuss amending complaint, filing for temporary injunctive relief and sending correspondence to opposing counsel re same; also discuss seeking shortened notice period.	0.40	\$ 395.00	\$ 158.00
1/30/2015	Barvir	Send/receive multiple emails to/from SAB, LLQ, and S. Dember re verification of First Amended Complaint; discuss amendments made and verification of same; discuss also finalizing for filing.	0.20	\$ 250.00	\$ 50.00
1/30/2015	Barvir	Draft First Amended Complaint; conduct legal research re same as necessary.	2.10	\$ 250.00	\$ 525.00
1/30/2015	Barvir	Send/receive multiple emails to/from MEL re First Amended Complaint; discuss citations to relevant Second Amendment case law.	0.10	\$ 250.00	\$ 25.00
1/30/2015	Brady	Review/Revise First Amended Complaint.	1.00	\$ 275.00	\$ 275.00
1/30/2015	Brady	Draft correspondence to S. Dember re executing verified amended complaint.	0.10	\$ 275.00	\$ 27.50
1/30/2015	Quesada	Meeting with MEL re filing of amended complaint.	0.20	\$ 100.00	\$ 20.00
2/1/2015	Barvir	Draft First Amended Complaint; conduct legal research re same as necessary; prepare document for filing, conduct final proofread, route to S. Dember for review, approval, and verification; receive verification from S. Dember; route all documents to LLQ to prepare for filing.	3.60	\$ 250.00	\$ 900.00
2/2/2015	Barvir	Meet with MDC to discuss assignment to draft declarations for CRPA and FFLGuard in support of motion for preliminary injunction; Review hearing transcripts for additional evidence points to raise; Discuss [REDACTED].	0.40	\$ 250.00	\$ 100.00
2/2/2015	Brady	Analyze order denying TRO with AMB and entry of demurrer on docket and discuss how best to address, and for communications with opposing counsel.	0.20	\$ 275.00	\$ 55.00
2/2/2015	Cubeiro	Draft declarations for CRPA and FFLGuard in support of motion for preliminary injunction; Review hearing transcripts for additional evidence points to raise.	2.50	\$ 125.00	\$ 312.50
2/2/2015	Cubeiro	Meet with AMB to discuss assignment to draft declarations for CRPA and FFLGuard in support of motion for preliminary injunction; Review hearing transcripts for additional evidence points to raise; Discuss [REDACTED]; Consult with JAS to document contact with DOJ prior to January 1, 2015 for use in declaration.	0.40	\$ 125.00	\$ 50.00
2/3/2015	Barvir	Meet with MDC to discuss revisions to declaration of various FFLs in support of motion for preliminary injunction and additional arguments to be made in declaration.	0.60	\$ 250.00	\$ 150.00
2/3/2015	Cubeiro	Meet with AMB to discuss revisions to declaration of various FFLs in support of motion for preliminary injunction; Include additional arguments to be made in declaration.	0.60	\$ 125.00	\$ 75.00
2/3/2015	Leidy	Draft declaratory relief section for motion for preliminary injunction.	2.50	\$ 125.00	\$ 312.50
2/4/2015	Barvir	Prepare for and attend telephone conference with SAB and [REDACTED] re [REDACTED] for use in preparing evidence in support of Motion for Preliminary Injunction; meeting with SAB to discuss outcome of call and further action.	1.40	\$ 250.00	\$ 350.00
2/4/2015	Barvir	Meeting with MDC to discuss declarations in support of motion for preliminary injunction; discuss additional concerns raised [REDACTED] to include in declarations.	0.20	\$ 250.00	\$ 50.00
2/4/2015	Barvir	Review/revise various individual declarations in support of motion for preliminary injunction; route suggested edits to MDC for incorporation into documents.	1.70	\$ 250.00	\$ 425.00
2/4/2015	Brady	Telephone conference with [REDACTED] and analyze with AMB re how to use in preliminary injunction motion.	1.40	\$ 275.00	\$ 385.00
2/4/2015	Cubeiro	Review and revise declarations in support of motion for preliminary injunction; Include additional arguments to be made in declaration.	5.40	\$ 125.00	\$ 675.00
2/5/2015	Cubeiro	Conduct legal research re [REDACTED]; Conduct research if [REDACTED] for a motion for preliminary injunction.	1.30	\$ 125.00	\$ 162.50
2/6/2015	Cubeiro	Meet with AMB to discuss declarations for individual FFLs; Update declaration template with additional information obtained from [REDACTED].	0.30	\$ 125.00	\$ 37.50
2/9/2015	Barvir	Meeting with MEL re declaratory relief case law for the motion for preliminary injunction.	0.60	\$ 250.00	\$ 150.00
2/9/2015	Brady	Meeting with AMB re preparation of declarations for Motion for Preliminary Injunction.	0.10	\$ 275.00	\$ 27.50
2/9/2015	Cubeiro	Review and revise declarations in support of motion for preliminary injunction; Include additional arguments to be made in declaration.	2.10	\$ 125.00	\$ 262.50
2/9/2015	Leidy	Conduct legal research re case law re declaratory relief against state agencies.	2.60	\$ 125.00	\$ 325.00
2/9/2015	Leidy	Review/Revise section on declaratory relief for Preliminary Injunction Motion.	1.60	\$ 125.00	\$ 200.00

Date	Timekeeper	Description	Hours	Rate	Amount
2/9/2015	Quesada	Review/Revise Notices of Filing Proofs of Service of First Amended Verified Complaint to Stephen Lindley, Kamala Harris and DOJ with AMB's revisions.	0.40	\$ 100.00	\$ 40.00
2/10/2015	Barvir	Send/receive multiple emails to/from MEL re draft section re declaratory relief action for Motion for Preliminary Injunction.	0.30	\$ 250.00	\$ 75.00
2/10/2015	Barvir	Review/revise proofs of service of amended complaint and summons; finalize and approve document; route to LLQ for formatting and filing.	0.30	\$ 250.00	\$ 75.00
2/10/2015	Barvir	Review/revise CRPA preliminary injunction declaration.	0.60	\$ 250.00	\$ 150.00
2/10/2015	Barvir	Meet with MDC to discuss revisions to FFL declaration template; Make required revisions and distribute to individual FFLs for review.	0.90	\$ 250.00	\$ 225.00
2/10/2015	Barvir	Review/revise declaratory relief action section of Motion for Preliminary Injunction with MEL; direct MEL to incorporate revisions as discussed.	1.60	\$ 250.00	\$ 400.00
2/10/2015	Brady	Review/Revise FFL declaration in support of Motion for Preliminary Injunction.	1.00	\$ 275.00	\$ 275.00
2/10/2015	Cubeiro	Meet with AMB to discuss revisions to FFL declaration template; Make required revisions and distribute to individual FFLs for review.	0.90	\$ 125.00	\$ 112.50
2/10/2015	Cubeiro	Meet with AMB to discuss revisions to FFL declaration template; Discuss assignment to research additional arguments to make in declaration.	0.10	\$ 125.00	\$ 12.50
2/10/2015	Leidy	Review/revise declaratory relief action section of Motion for Preliminary Injunction with AMB.	1.60	\$ 125.00	\$ 200.00
2/11/2015	Barvir	Draft Motion for Preliminary Injunction; conduct research re same.	2.90	\$ 250.00	\$ 725.00
2/11/2015	Barvir	Send/receive emails to/from MDC re potential declarants for declarations in support of Motion for Preliminary Injunction.	0.10	\$ 250.00	\$ 25.00
2/11/2015	Leidy	Review/Revise declaratory relief action section of Motion for Preliminary Injunction based on case law found regarding enjoining regulatory schemes.	0.40	\$ 125.00	\$ 50.00
2/13/2015	Barvir	Meeting with MEL re revisions made in the declaratory and injunctive relief section of the Motion for Preliminary injunction; assignment to discuss further the vagueness of the statute without the Department's promulgation of regulations.	1.60	\$ 250.00	\$ 400.00
2/13/2015	Barvir	Draft Motion for Preliminary Injunction; conduct legal research re same.	4.90	\$ 250.00	\$ 1,225.00
2/13/2015	Leidy	Meeting with AMB re revisions made in the declaratory and injunctive relief section of the Motion for Preliminary injunction; assignment to discuss further the vagueness of the statute without the Department's promulgation of regulations.	1.60	\$ 125.00	\$ 200.00
2/16/2015	Cubeiro	Meet with AMB to discuss deadline for filing motion for preliminary injunction; Discuss status of declarations necessary for motion for preliminary injunction.	0.10	\$ 125.00	\$ 12.50
2/16/2015	Leidy	Review/Revise declaratory relief section of Motion for Preliminary Injunction; adding discussion of how there are no regulations regarding safe-handling demonstrations for unique action long guns and incomplete firearms or receivers.	0.70	\$ 125.00	\$ 87.50
2/17/2015	Barvir	Meet with SAB and MEL to discuss proposed emergency regulations by DOJ Bureau of Firearms re Firearms Safety Certificate Program and safe-handling demonstrations; discuss regulatory opposition strategy and impact on Belemjian litigation.	0.20	\$ 250.00	\$ 50.00
2/17/2015	Barvir	Meeting with SAB and JAS re DOJ announcement of proposed "emergency" regulations re Firearms Safety Certificate Program.	0.30	\$ 250.00	\$ 75.00
2/17/2015	Barvir	Draft Motion for Preliminary Injunction; review/revise MEL sections re section 1060 declaratory relief action; conduct legal research as needed.	3.20	\$ 250.00	\$ 800.00
2/17/2015	Barvir	Meet with MEL to discuss proposed emergency regulations by DOJ Bureau of Firearms re Firearms Safety Certificate Program and safe-handling demonstrations; assign tasks to MEL as needed.	0.40	\$ 250.00	\$ 100.00
2/17/2015	Barvir	Receive/review/analyze proposed emergency regulations by DOJ Bureau of Firearms re Firearms Safety Certificate Program and safe-handling demonstrations; draft attorney's notes re same.	0.50	\$ 250.00	\$ 125.00
2/17/2015	Barvir	Draft Motion for Preliminary Injunction; review/revise MEL sections re section 1060 declaratory relief action; conduct legal research as needed.	2.10	\$ 250.00	\$ 525.00
2/17/2015	Brady	Analyze strategy for addressing DOJ's proposed emergency regulations re FSC.	0.30	\$ 275.00	\$ 82.50
2/17/2015	Brady	Meeting with AMB and JAS re DOJ announcement of proposed "emergency" regulations re Firearms Safety Certificate Program.	0.30	\$ 275.00	\$ 82.50
2/17/2015	Cubeiro	Conduct legal research re [REDACTED] for use in drafting Second Amendment argument of Motion for Preliminary Injunction.	0.90	\$ 125.00	\$ 112.50
2/17/2015	Cubeiro	Send email to declarants notifying of proposed emergency regulations posted by CAL DOJ.	0.70	\$ 125.00	\$ 87.50
2/18/2015	Barvir	Meeting with SAB to discuss status of DOJ emergency regulations re Firearm Safety Certificate Program and litigation strategy in light thereof.	0.20	\$ 250.00	\$ 50.00
2/18/2015	Barvir	Receive/review/analyze Statement of Emergency re proposed emergency regulations by DOJ Bureau of Firearms re Firearms Safety Certificate Program and safe-handling demonstrations; draft attorney's notes re same.	1.10	\$ 250.00	\$ 275.00

Date	Timekeeper	Description	Hours	Rate	Amount
2/18/2015	Brady	Analyze issues re litigation strategy with AMB in light of DOJ's emergency FSC regulations.	0.20	\$ 275.00	\$ 55.00
2/18/2015	Leidy	Review Emergency Regulations submitted re Firearm Safety Certificates.	1.00	\$ 125.00	\$ 125.00
2/18/2015	Leidy	Conduct legal research re definition of emergency in emergency regulations.	1.00	\$ 125.00	\$ 125.00
2/19/2015	Leidy	Conduct legal research re case law discussing when an emergency regulation is arbitrary and capricious.	2.30	\$ 125.00	\$ 287.50
2/20/2015	Barvir	Analyze issues re DOJ's proposed FSC regulations with SAB and consider strategy for addressing.	0.60	\$ 250.00	\$ 150.00
2/20/2015	Brady	Analyze issues re DOJ's proposed FSC regulations with AMB and consider strategy for addressing.	0.60	\$ 275.00	\$ 165.00
2/23/2015	Barvir	Receipt, review and analyze notice from court assigning judge for all purposes; route to MEL.	0.10	\$ 250.00	\$ 25.00
2/23/2015	Leidy	Conduct legal research re information about Judge Alan Simpson.	0.40	\$ 125.00	\$ 50.00
2/24/2015	Barvir	Receipt, review and analyze [REDACTED] comments re [REDACTED] re FSC Program;	0.60	\$ 250.00	\$ 150.00
2/27/2015	Leidy	Conduct legal research re case law's definition of emergency regulation for purposes of determining whether any opposition to the FSC Program underground regulations remains.	1.40	\$ 125.00	\$ 175.00
2/27/2015	Leidy	Conduct legal research re [REDACTED]	1.90	\$ 125.00	\$ 237.50
3/3/2015	Brady	Analyze strategy for proceeding with AMB, including [REDACTED]	0.30	\$ 275.00	\$ 82.50
3/3/2015	Leidy	Conduct legal research re [REDACTED]; research on [REDACTED]	1.30	\$ 125.00	\$ 162.50
3/3/2015	Quesada	Conduct research re hearing date for demurrer on court's website; telephone call to MEL re same.	0.20	\$ 100.00	\$ 20.00
3/3/2015	Quesada	Send email to MEL and AMB re due date for opposition to demurrer; ask if date should be calendared since demurrer hasn't been served yet; or wait to calendar once we receive demurrer.	0.10	\$ 100.00	\$ 10.00
3/4/2015	Barvir	Telephone conference with SAB re [REDACTED]; discuss and determine [REDACTED]	0.20	\$ 250.00	\$ 50.00
3/5/2015	Silvoso	Conduct research re: status of FSC emergency regs.	0.50	\$ 300.00	\$ 150.00
3/9/2015	Barvir	Analyze strategy for opposing demurrer with SAB.	0.30	\$ 250.00	\$ 75.00
3/9/2015	Barvir	Meeting with MEL re research assignment concerning time Office of Administrative Law has to respond to emergency regulations promulgated; discuss strategies in responding to demurrer or filing a motion for leave to amend the complaint.	0.60	\$ 250.00	\$ 150.00
3/9/2015	Barvir	Meeting with MEL and SAB re Office of Administrative Law's decision that regulations qualify as emergency regulations.	0.20	\$ 250.00	\$ 50.00
3/9/2015	Barvir	Receipt, review and analyze State's Demurrer to First Amended Complaint and associated documents; review arguments and determine appropriate response; draft attorney's notes re same.	1.90	\$ 250.00	\$ 475.00
3/9/2015	Barvir	Receipt, review and analyze MEL research re OAL deadline to reject/approve DOJ's emergency regulation package re FSC Program and safe-handling demonstrations; conduct research to supplement MEL's findings and determine hard deadline; review various OAL emergency determinations and determine likelihood of OAL rejecting FSC Program regulations; route findings to SAB and MEL.	0.60	\$ 250.00	\$ 150.00
3/9/2015	Barvir	Send email re OAL adopting DOJ's emergency FSC Program regulations to JAS, SAB, MEL, and MDC; send/receive email to/from MDC re PRAR re same.	0.10	\$ 250.00	\$ 25.00
3/9/2015	Barvir	Receipt, review and analyze OAL checklist for emergency regulations and list of identified, published appellate decisions regarding what constitutes an "emergency" for purposes of passing emergency regulations; route to MEL for review and consideration for amended complaint and future briefing.	0.20	\$ 250.00	\$ 50.00
3/9/2015	Barvir	Receipt, review and analyze OAL past determinations re what constitutes an invalid underground regulation; route to MEL for review.	0.40	\$ 250.00	\$ 100.00
3/9/2015	Brady	Send/receive multiple emails to/from AMB and MEL re follow up questions in light of MEL research re leave to amend complaint after demurrer and whether new claims may be added.	0.10	\$ 275.00	\$ 27.50
3/9/2015	Brady	Meeting with MEL and AMB re Office of Administrative Law's decision that regulations qualify as emergency regulations.	0.20	\$ 275.00	\$ 55.00
3/9/2015	Brady	Receipt, review and analyze OAL decision granting DOJ's emergency regulations and discuss litigation strategy in light thereof with AMB.	0.30	\$ 275.00	\$ 82.50

Date	Timekeeper	Description	Hours	Rate	Amount
3/9/2015	Brady	Receive and review and respond to correspondence re OAL decision on pending emergency FSC regulations.	0.10	\$ 275.00	\$ 27.50
3/9/2015	Brady	Analyze strategy for responding to demurrer with AMB.	0.30	\$ 275.00	\$ 82.50
3/9/2015	Leidy	Meeting with AMB re research assignment concerning time Office of Administrative Law has to respond to emergency regulations promulgated; discuss strategies in responding to demurrer or filing a motion for leave to amend the complaint.	0.60	\$ 125.00	\$ 75.00
3/9/2015	Leidy	Meeting with AMB and SAB re Office of Administrative Law's decision that regulations qualify as emergency regulations.	0.20	\$ 125.00	\$ 25.00
3/9/2015	Leidy	Conduct legal research re time Office of Administrative Law has to respond to emergency regulations promulgated; whether amended complaint can state new claims; whether proper to respond to Demurrer with Motion to Leave for Amended Complaint.	1.10	\$ 125.00	\$ 137.50
3/10/2015	Barvir	Meeting with MEL re Public Record Act Request to Office of Administrative Law requesting case file concerning emergency regulations re Firearm Safety Certificate.	0.10	\$ 250.00	\$ 25.00
3/10/2015	Cubeiro	Research emergency FSC regulations and California Penal Code re NRA certified instructor requirement for firearm safety certificate instructors; Call FFL declarants to determine how FSC certified employees received training requirements.	0.70	\$ 125.00	\$ 87.50
3/10/2015	Leidy	Meeting with AMB re Public Record Act Request to Office of Administrative Law requesting case file concerning emergency regulations re Firearm Safety Certificate.	0.10	\$ 125.00	\$ 12.50
3/10/2015	Leidy	Draft Public Records Act Request to Office of Administrative Law re file on FSC Program emergency regulations.	0.60	\$ 125.00	\$ 75.00
3/10/2015	Leidy	Review/Revise Public Records Act Request to Office of Administrative Law re file on FSC Program emergency regulations.	0.30	\$ 125.00	\$ 37.50
3/11/2015	Barvir	Review/revise draft PRAR to OAL re all OAL files re rejected emergency regulation proposals; route to MEL for final formatting and distribution.	0.20	\$ 250.00	\$ 50.00
3/11/2015	Barvir	Conduct legal research re [REDACTED] [REDACTED] for use in response to demurrer and potential claims to include in Second Amended Complaint re same; draft attorney's notes.	1.10	\$ 250.00	\$ 275.00
3/12/2015	Barvir	Receipt, review and analyze follow-up research memorandum re amending complaint after demurrer sustained with leave to amend; determine impact on litigation strategy.	0.30	\$ 250.00	\$ 75.00
3/12/2015	Barvir	Meeting with MEL re litigation strategy in light of State's demurrer to First Amended Complaint and adoption of emergency regulations; brainstorm pros and cons for each course of action; prepare to meet with SAB and CDM re same.	0.90	\$ 250.00	\$ 225.00
3/12/2015	Leidy	Review Defendants' Demurrer to help draft sections of opposition requesting leave to amend complaint.	2.00	\$ 125.00	\$ 250.00
3/13/2015	Barvir	Meeting with MEL re catalyst theory to obtain attorneys fees for determining litigation strategy in light of defendants passing emergency regulations.	0.60	\$ 250.00	\$ 150.00
3/13/2015	Barvir	Meeting with MEL re litigation strategy; discuss [REDACTED]	0.60	\$ 250.00	\$ 150.00
3/13/2015	Barvir	Send/receive email to/from SAB and MEL re problem with filing Second Amended Complaint to introduce new claims and arguments in light of state's adoption of emergency regulations; discuss [REDACTED]	0.20	\$ 250.00	\$ 50.00
3/13/2015	Brady	Send/receive email to/from AMB and MEL re problem with filing Second Amended Complaint to introduce new claims and arguments in light of state's adoption of emergency regulations; discuss [REDACTED]	0.20	\$ 275.00	\$ 55.00
3/13/2015	Leidy	Meeting with AMB re legal research findings re catalyst theory to obtain attorneys fees for use in determining strategy for responding to Defendants' demurrer.	0.60	\$ 125.00	\$ 75.00
3/13/2015	Leidy	Meeting with AMB re litigation strategy; discuss filing [REDACTED]	0.60	\$ 125.00	\$ 75.00
3/13/2015	Leidy	Conduct legal research re catalyst theory to obtain attorneys fees for use in determining strategy for responding to Defendants' demurrer.	0.80	\$ 125.00	\$ 100.00
3/18/2015	Barvir	Meeting with MEL re litigation strategy; discuss catalyst theory and attorneys fee research for use in determining response to Defendants' demurrer.	0.40	\$ 250.00	\$ 100.00
3/18/2015	Leidy	Conduct legal research re catalyst theory for attorneys fees to be used in determining strategy for responding to Defendants' demurrer.	1.90	\$ 125.00	\$ 237.50
3/18/2015	Leidy	Conduct legal research re catalyst theory for attorneys fees to be used in determining strategy for responding to Defendants' demurrer.	0.70	\$ 125.00	\$ 87.50

Date	Timekeeper	Description	Hours	Rate	Amount
3/18/2015	Leidy	Meeting with AMB re litigation strategy; discuss catalyst theory and attorneys fee research for purposes of determining strategy for responding to Defs' demurrer.	0.40	\$ 125.00	\$ 50.00
3/24/2015	Barvir	Meeting with CDM re litigation strategy in light of passage of emergency regulations; determine [REDACTED] and discuss [REDACTED].	0.40	\$ 250.00	\$ 100.00
3/24/2015	Michel	Meeting with AMB re litigation strategy in light of passage of emergency regulations; determine [REDACTED] and discuss [REDACTED].	0.40	\$ 395.00	\$ 158.00
3/25/2015	Barvir	Meeting with CDM re litigation strategy; discuss whether to oppose demurrer or dismiss; discuss possibility of receiving attorney's fees award.	0.20	\$ 250.00	\$ 50.00
3/25/2015	Leidy	Conduct legal research re when discovery starts; and procedure for obtaining discovery for attorney fees under catalyst theory after demurrer granted.	1.70	\$ 125.00	\$ 212.50
3/25/2015	Michel	Meeting with AMB re litigation strategy; discuss whether to oppose demurrer or dismiss; discuss possibility of receiving attorney's fees award.	0.20	\$ 395.00	\$ 79.00
3/26/2015	Barvir	Conduct legal research re relief available to preserve jurisdiction in Superior Court after sustaining demurrer without leave to amend for purpose of bringing fee motion and conducting discovery re same.	1.60	\$ 250.00	\$ 400.00
3/26/2015	Barvir	Receive and review template for Response to Defendants' Demurrer; draft Response to Defendants' Demurrer; conduct research as necessary.	1.20	\$ 250.00	\$ 300.00
3/26/2015	Barvir	Meeting with MEL re facts establishing validity of catalyst theory attorney fees to determine response to Defendants' demurrer.	1.00	\$ 250.00	\$ 250.00
3/26/2015	Leidy	Conduct legal research re [REDACTED] to be used in determining strategy for responding to Defendants' demurrer.	1.20	\$ 125.00	\$ 150.00
3/26/2015	Leidy	Meeting with AMB re facts establishing validity of catalyst theory attorney fees to determine response to Defs' demurrer.	1.00	\$ 125.00	\$ 125.00
3/26/2015	Leidy	Conduct legal research re cases [REDACTED] to be used in determining strategy for responding to Defendants' demurrer.	0.50	\$ 125.00	\$ 62.50
3/27/2015	Barvir	Meeting with CDM, MEL, CBM, SAB, and MDC to discuss litigation strategies.	0.20	\$ 250.00	\$ 50.00
3/27/2015	Brady	Meeting with CDM, AMB, CBM, MEL, and MDC to discuss litigation strategies.	0.20	\$ 275.00	\$ 55.00
3/27/2015	Leidy	Meeting with AMB re filing a motion for limited discovery or evidentiary hearing.	1.10	\$ 125.00	\$ 137.50
3/27/2015	Michel	Meeting with AMB, MEL, CBM, SAB, and MDC to discuss litigation strategies.	0.20	\$ 395.00	\$ 79.00
3/30/2015	Barvir	Meeting with MEL re filing a motion for limited discovery or an evidentiary hearing.	0.10	\$ 250.00	\$ 25.00
3/30/2015	Barvir	Draft Plaintiffs' Response to Defendants' Demurrer to First Amended Complaint; conduct legal research as necessary.	2.50	\$ 250.00	\$ 625.00
3/30/2015	Barvir	Draft Plaintiffs' Response to Defendants' Demurrer to First Amended Complaint; conduct legal research as necessary.	1.80	\$ 250.00	\$ 450.00
3/30/2015	Leidy	Conduct legal research re filing a motion for limited discovery or an evidentiary hearing.	2.60	\$ 125.00	\$ 325.00
3/30/2015	Leidy	Conduct legal research re filing a motion for limited discovery or an evidentiary hearing.	1.00	\$ 125.00	\$ 125.00
3/30/2015	Leidy	Meeting with AMB re filing a motion for limited discovery or an evidentiary hearing.	0.10	\$ 125.00	\$ 12.50
3/30/2015	Leidy	Draft Request for Extension of Time to File Motion for Attorney Fees for purpose of doing limited discovery.	3.10	\$ 125.00	\$ 387.50
3/31/2015	Barvir	Draft Plaintiffs' Response to Defendants' Demurrer to First Amended Complaint; conduct legal research as necessary.	4.00	\$ 250.00	\$ 1,000.00
3/31/2015	Barvir	Draft Plaintiffs' Response to Defendants' Demurrer to First Amended Complaint; conduct legal research as necessary.	2.40	\$ 250.00	\$ 600.00
3/31/2015	Leidy	Draft Statement of Facts for Motion for Extension of time to file Attorneys Fee Motion.	3.70	\$ 125.00	\$ 462.50
4/1/2015	Barvir	Telephone conference with MEL re preparation of Request for Judicial Notice In Support of Plaintiffs Nonopposition to Demurrer; Plaintiffs Nonopposition to Demurrer; and Declaration of AMB in Support of Demurrer.	0.30	\$ 250.00	\$ 75.00
4/1/2015	Barvir	Telephone conference with MEL re AMB declaration supporting response to demurrer; conduct line-by-line revision of same; send/receive multiple emails to/from MEL re same.	0.70	\$ 250.00	\$ 175.00
4/1/2015	Barvir	Send/receive multiple emails to/from SAB and MEL re email communications with opposing counsel for use as exhibits supporting response to demurrer; analyze all communications from SAB and J. Rich to determine whether all are included; send email to SAB and MEL re follow up assignments.	0.30	\$ 250.00	\$ 75.00

Date	Timekeeper	Description	Hours	Rate	Amount
4/1/2015	Barvir	Send/receive emails to/from SAB and MEL re status of drafting response to demurrer; direct SAB to review and provide feedback and to profile all communications with opposing counsel for inclusion as exhibits.	0.10	\$ 250.00	\$ 25.00
4/1/2015	Barvir	Draft Plaintiffs' Non-Opposition to Demurrer and Request for Stay of Entry of Judgment; conduct legal research re same; review/revise/format document; route to MEL for review.	5.20	\$ 250.00	\$ 1,300.00
4/1/2015	Brady	Review file re correspondence with opposing counsel to use in opposition to demurrer and discuss brief with AMB.	0.30	\$ 275.00	\$ 82.50
4/1/2015	Leidy	Draft AMB's Declaration ISO Plaintiffs Non-opposition to Demurrer.	1.80	\$ 125.00	\$ 225.00
4/1/2015	Leidy	Draft AMB's Declaration ISO Plaintiffs Non-opposition to Demurrer.	1.20	\$ 125.00	\$ 150.00
4/1/2015	Leidy	Review/Revise AMB's Declaration in Support of Plaintiffs' Non-Opposition to the Demurrer.	2.00	\$ 125.00	\$ 250.00
4/1/2015	Leidy	Telephone conference with AMB re revisions to AMB's Declaration in Support of Plaintiffs' Non-Opposition to the Demurrer.	0.70	\$ 125.00	\$ 87.50
4/1/2015	Leidy	Preparation of exhibits for AMB's Declaration in Support of Plaintiffs' Non-Opposition to the Demurrer.	0.50	\$ 125.00	\$ 62.50
4/1/2015	Leidy	Review/Revise citations in Plaintiffs' Non-opposition to Defendants' Demurrer.	0.60	\$ 125.00	\$ 75.00
4/1/2015	Leidy	Telephone conference with AMB re Request for Judicial Notice In Support of Plaintiffs Nonopposition to Demurrer; Plaintiffs Nonopposition to Demurrer; and Declaration of AMB in Support of Demurrer.	0.30	\$ 125.00	\$ 37.50
4/1/2015	Quesada	Meeting with MEL re preparation of exhibits for AMB's Declaration.	0.10	\$ 100.00	\$ 10.00
4/1/2015	Quesada	Draft Request for Judicial Notice and email link to AMB, MEL.	0.50	\$ 100.00	\$ 50.00
4/2/2015	Barvir	Send/receive email to/from opposing counsel re request to send electronic courtesy copies of Plaintiffs' response to demurrer.	0.10	\$ 250.00	\$ 25.00
4/2/2015	Barvir	Meeting with MEL re reviewing Plaintiffs' Response to Defendants' Demurrer.	0.30	\$ 250.00	\$ 75.00
4/2/2015	Barvir	Review/revise with MEL for final revisions to Plaintiffs' Non-opposition to Defendants' Demurrer; AMB's Declaration In Support of Non-opposition to Defendants' Demurrer; and exhibits.	2.10	\$ 250.00	\$ 525.00
4/2/2015	Barvir	Review/revise Response to Defendants' Demurrer; re-draft sections of brief per suggested edits of MEL and SAB; review, revise, and redraft Declaration of AMB and Request for Judicial Notice in Support; review all exhibits in support and approve for form and content; conduct final proofread and finalize document for filing; print and sign documents; route to LLQ for formatting and filing; oversee filing.	2.50	\$ 250.00	\$ 625.00
4/2/2015	Barvir	Send/receive emails to/from opposing counsel re status of filing response to demurrer and request to submit electronic courtesy copies.	0.30	\$ 250.00	\$ 75.00
4/2/2015	Brady	Review/Revise opposition to demurrer and discuss with AMB.	0.40	\$ 275.00	\$ 110.00
4/2/2015	Leidy	Meeting with AMB re reviewing Plaintiffs' Non-opposition to Defendants' Demurrer.	0.30	\$ 125.00	\$ 37.50
4/2/2015	Quesada	Preparation of exhibits (change tabs from numbers to letters); finalize Request for Judicial Notice and Non-Opposition and Response to Defendants' Demurrer; prepare for overnight mail to opposing counsel.	0.40	\$ 100.00	\$ 40.00
4/3/2015	Barvir	Send/receive email to/from opposing counsel; search for and provide electronic courtesy copies of filings re response to State's demurrer.	0.20	\$ 250.00	\$ 50.00
4/3/2015	Silvoso	Conduct research re: last day for DOJ to file regulations for FSC and status of current FSC regs; e-mail AD and AMB to calendar.	0.40	\$ 300.00	\$ 120.00
4/6/2015	Barvir	Meeting with CDM re litigation strategy and status; discuss discovery and fee motion.	0.20	\$ 250.00	\$ 50.00
4/8/2015	Barvir	Meeting with MEL re option to file ex parte motion to extend time before filing judgment and allow minimum discovery for attorney fees.	0.20	\$ 250.00	\$ 50.00
4/8/2015	Leidy	Meeting with AMB re to file ex parte motion to extend time before filing judgment and allow minimum discovery for attorney fees.	0.20	\$ 125.00	\$ 25.00
4/8/2015	Leidy	Conduct legal research re whether can file ex parte motion to extend time before judgment filed to allow limited discovery for attorneys fee motion.	0.70	\$ 125.00	\$ 87.50
4/9/2015	Leidy	Draft motion to shorten time on motion stay judgment.	3.90	\$ 125.00	\$ 487.50
4/9/2015	Leidy	Meeting with AMB re filing motion to stay judgment and motion to shorten time.	0.10	\$ 125.00	\$ 12.50
4/9/2015	Leidy	Conduct legal research re cases that support limited discovery after judgment is issued in order to draft attorney fees under catalyst theory.	0.80	\$ 125.00	\$ 100.00
4/10/2015	Barvir	Review/revise MEL draft of ex parte application for order shortening time.	1.30	\$ 250.00	\$ 325.00
4/10/2015	Barvir	Send/receive email to/from LLQ re scheduling hearing re ex parte application for order shortening time.	0.20	\$ 250.00	\$ 50.00
4/10/2015	Barvir	Send/receive email to/from SAB re litigation strategy; discuss filing ex parte application re shortening time to hear motion re delay of entry of judgment.	0.20	\$ 250.00	\$ 50.00
4/10/2015	Barvir	Send/receive email to/from SAB and MEL re litigation strategy re seeking post-judgment discovery.	0.20	\$ 250.00	\$ 50.00

Date	Timekeeper	Description	Hours	Rate	Amount
4/10/2015	Barvir	Receipt, review and analyze MEL research re support for argument that court should stay entry of judgment pending discovery re attorney's fees; conduct follow-up research; draft memorandum re findings and advice re whether to file motion; route to JRD, SAB, and MEL for review.	1.10	\$ 250.00	\$ 275.00
4/10/2015	Barvir	Meeting with JRD and SAB re litigation strategy; discuss [REDACTED]; brainstorm [REDACTED].	0.60	\$ 250.00	\$ 150.00
4/10/2015	Leidy	Meeting with AMB re motion to shorten time to hear motion to stay judgment.	1.50	\$ 125.00	\$ 187.50
4/10/2015	Quesada	Receipt, review and analyze OAL response to PRAR #308044; email to AMB advising that payment for production of documents was mailed on 4/6/15.	0.10	\$ 100.00	\$ 10.00
4/12/2015	Barvir	Draft Notice of Motion and Motion to Delay Entry of Judgment; conduct legal research re same.	3.80	\$ 250.00	\$ 950.00
4/13/2015	Barvir	Meeting with CDM and JRD re litigation strategy; [REDACTED].	0.40	\$ 250.00	\$ 100.00
4/13/2015	Barvir	Meeting with MEL and SMF re discovery strategy and support for motion to delay entry of judgment; brainstorm sorts of discovery to seek and arguments to raise in support of motion.	0.30	\$ 250.00	\$ 75.00
4/13/2015	Barvir	Draft Notice of Motion and Motion to Delay Entry of Judgment; conduct legal research re same.	2.00	\$ 250.00	\$ 500.00
4/13/2015	Barvir	Meeting with MEL discussing plans for first phase of discovery.	0.30	\$ 250.00	\$ 75.00
4/13/2015	Barvir	Draft Notice of Motion and Motion to Delay Entry of Judgment; conduct legal research re same.	3.10	\$ 250.00	\$ 775.00
4/13/2015	Leidy	Conduct legal research re discovery plan for evidence to assist in motion for attorney fees.	1.60	\$ 125.00	\$ 200.00
4/13/2015	Leidy	Meeting with AMB discussing plans for first phase of discovery.	0.30	\$ 125.00	\$ 37.50
4/13/2015	Michel	Meeting with AMB and JRD re litigation strategy; discuss issues re filing motion to stay judgment for limited discovery and propounding discovery re catalyst theory for attorneys' fees.	0.40	\$ 395.00	\$ 158.00
4/13/2015	Quesada	Telephone conference with Courtcall to schedule telephonic appearance for CBM, SAB and AMB on 4/15/15 re Defendants' Demurrer; update calendar event with CourtCall information; draft proof of service for Request for Courtcall; fax Request to Courtcall to opposing counsel; scan request for CourtCall with fax confirmation and save into imanager; update internal case docket; send Reques for CourtCall to opposing counsel via overnight mail; check request for CourtCall.	1.60	\$ 100.00	\$ 160.00
4/14/2015	Barvir	Meeting with MEL re discovery requests.	1.00	\$ 250.00	\$ 250.00
4/14/2015	Barvir	Meeting with MEL re declaration in support of motion to stay judgment.	0.10	\$ 250.00	\$ 25.00
4/14/2015	Barvir	Draft Notice of Motion and Motion to Delay Entry of Judgment; conduct legal research re same; draft AMB declaration in support of motion; prepare exhibits in support.	3.60	\$ 250.00	\$ 900.00
4/14/2015	Barvir	Review/revise Notice of Motion and Motion to Delay Entry of Judgment and all supporting documents with MEL in preparation for filing; draft Proposed Order Granting Motion to Delay Entry of Judgment; insert edits into document and format for filing; route to LLQ for scanning and distribution to attorneys' service.	2.40	\$ 250.00	\$ 600.00
4/14/2015	Leidy	Meeting with AMB re discovery requests.	1.00	\$ 125.00	\$ 125.00
4/14/2015	Leidy	Meeting with AMB re declaration in support of motion to stay judgment.	0.10	\$ 125.00	\$ 12.50
4/14/2015	Leidy	Meeting with AMB to review and revise motion to delay entry of judgment; declaration of AMB; and proposed order.	3.60	\$ 125.00	\$ 450.00
4/14/2015	Leidy	Meeting with AMB re drafting Requests for Production.	1.10	\$ 125.00	\$ 137.50
4/14/2015	Quesada	Finalize Motion to Delay Entry of Judgment and email same to Eddings Attorney service for filing with Fresno Superior Court; service byFedEx to OC.	0.60	\$ 100.00	\$ 60.00
4/15/2015	Barvir	Draft Requests for Production of Documents, Set One.	2.00	\$ 250.00	\$ 500.00
4/15/2015	Barvir	Meeting with MEL re legal research on motions for reconsideration after tentative ruling.	0.60	\$ 250.00	\$ 150.00
4/15/2015	Brady	Receive and review and respond to correspondence from AMB re proposed discovery to propound re fee motion.	0.30	\$ 275.00	\$ 82.50
4/15/2015	Leidy	Conduct legal research re motions for reconsideration after tentative ruling.	0.80	\$ 125.00	\$ 100.00
4/15/2015	Leidy	Meeting with AMB re legal research on motions for reconsideration after tentative ruling.	0.60	\$ 125.00	\$ 75.00
4/16/2015	Barvir	Send/receive multiple emails to/from JAS re [REDACTED].	0.10	\$ 250.00	\$ 25.00
4/16/2015	Barvir	Send/receive multiple emails to/from MEL re preparation of Form Interrogatories, Set One; discuss [REDACTED]; conduct research re same.	0.30	\$ 250.00	\$ 75.00

Date	Timekeeper	Description	Hours	Rate	Amount
4/16/2015	Barvir	Receipt, review and analyze 1000-page PRAR response from Office of Administrative Law re implementation of FSC Program and passage of FSC Program emergency regulations; draft attorney's notes re same; discuss findings with SAB and MDC; assign MDC task of preparing table of contents of important documents.	3.20	\$ 250.00	\$ 800.00
4/16/2015	Brady	Analyze strategy with AMB.	0.10	\$ 275.00	\$ 27.50
4/16/2015	Leidy	Draft requests to include in the Request for Production being propounded on Defendants.	2.20	\$ 125.00	\$ 275.00
4/16/2015	Quesada	Conduct research re Graham v DaimlerChrysler Corp. whether discovery was allowed after case dismissed on mootness grounds; email to MEL and AMB.	0.70	\$ 100.00	\$ 70.00
4/20/2015	Barvir	Receipt, review and analyze minute order granting state's demurrer; consider whether follow up is needed.	0.20	\$ 250.00	\$ 50.00
4/20/2015	Barvir	Send/receive emails to/from JAS re [REDACTED].	0.10	\$ 250.00	\$ 25.00
4/27/2015	Barvir	Send/receive multiple emails to/from opposing counsel re courtesy copies of minute order granting demurrer and receipt from court; conduct research to confirm minute order received from court.	0.20	\$ 250.00	\$ 50.00
5/1/2015	Barvir	Meeting with SAB re fee motion; discuss status of discovery issues and arguments to make in support.	0.10	\$ 250.00	\$ 25.00
5/5/2015	Barvir	Meeting with SAB and CDM re strategy for discovery motion and fee motion.	0.20	\$ 250.00	\$ 50.00
5/5/2015	Brady	Meeting with CDM and AMB re strategy for discovery motion and fee motion.	0.20	\$ 275.00	\$ 55.00
5/5/2015	Michel	Meeting with SAB and AMB re strategy for discovery motion and fee motion.	0.20	\$ 395.00	\$ 79.00
5/6/2015	Barvir	Receipt, review and analyze MEL research memoranda re procedure for and propriety of filing objections to Proposed Judgment; assign MEL follow up research tasks; meeting with MEL to discuss same; assign task of preparing draft of objection to proposed judgment.	0.40	\$ 250.00	\$ 100.00
5/6/2015	Barvir	Receipt, review and analyze Defendants' Proposed Judgment re Dismissal; email to/from CDM re same; draft attorney's notes re potential objections; route to MEL re researching procedure and propriety of filing objection to proposed judgment.	0.40	\$ 250.00	\$ 100.00
5/8/2015	Barvir	Send/receive multiple emails to/from MEL re research re Memorandum of Costs and Motion to Strike Costs.	0.20	\$ 250.00	\$ 50.00
5/8/2015	Barvir	Send/receive multiple emails to/from MEL re research re statutory authority for objecting to proposed judgment.	0.20	\$ 250.00	\$ 50.00
5/8/2015	Barvir	Receipt, review and analyze research memorandum re filing objection to proposed judgment; draft attorney's notes re same and begin outline of objection.	0.70	\$ 250.00	\$ 175.00
5/8/2015	Barvir	Meeting with SAB re litigation strategy; discuss possible objections to proposed judgment and preparation for case management conference; assign SAB task of revising Plaintiffs' Objections to Proposed Judgment re dismissal.	0.30	\$ 250.00	\$ 75.00
5/8/2015	Barvir	Review and revise Plaintiffs' Objections to Proposed Judgment re dismissal.	2.00	\$ 250.00	\$ 500.00
5/8/2015	Barvir	Draft Reply to Defendants' Opposition to Motion to Delay Entry of Judgment; conduct legal research as necessary.	3.10	\$ 250.00	\$ 775.00
5/8/2015	Barvir	Meeting with MEL re case law to support discovery after judgment for attorneys fees motions.	1.00	\$ 250.00	\$ 250.00
5/8/2015	Barvir	Meeting with MEL re objections to proposed judgment; and Reply to Defendants' Memorandum of Points and Authorities in Support of Opposition to Motion to Delay Entry of Judgment.	1.10	\$ 250.00	\$ 275.00
5/8/2015	Brady	Review and revise objections to proposed judgment.	0.30	\$ 275.00	\$ 82.50
5/8/2015	Leidy	Draft Plaintiffs' Objections to Proposed Judgment.	0.80	\$ 125.00	\$ 100.00
5/8/2015	Leidy	Meeting with AMB re objections to proposed judgment; and filing Reply to Defendants' Memorandum of Points and Authorities in Support of Opposition to Motion to Delay Entry of Judgment.	1.10	\$ 125.00	\$ 137.50
5/8/2015	Leidy	Conduct legal research re [REDACTED].	2.10	\$ 125.00	\$ 262.50
5/8/2015	Quesada	Draft Plaintiffs' Objection to Proposed Judgment, calendar deadline to file Objection, draft template for reply to opposition to delay entry of judgment; email to AMB and MEL.	0.30	\$ 100.00	\$ 30.00
5/11/2015	Barvir	Prepare for and attend scheduled Case Management Conference; meeting with LLQ to schedule continued CMC.	0.90	\$ 250.00	\$ 225.00
5/12/2015	Barvir	Draft, review, and revise Objections to Defendants' Proposed Judgment; conduct legal research as necessary; route to LLQ for formatting and filing;	4.10	\$ 250.00	\$ 1,025.00
5/12/2015	Barvir	Draft Reply to Defendants' Opposition to Motion to Delay Entry of Judgment; conduct legal research as necessary.	2.90	\$ 250.00	\$ 725.00
5/12/2015	Leidy	Proofread Plaintiffs' Objections to Defendants' Proposed Judgment of Dismissal After Sustaining Demurrer to First Amended Complaint Without Leave to Amend.	0.30	\$ 125.00	\$ 37.50
5/13/2015	Barvir	Meeting with LLQ re differences in tentative ruling mailed to opposing counsel.	0.30	\$ 250.00	\$ 75.00

Date	Timekeeper	Description	Hours	Rate	Amount
5/13/2015	Barvir	Meeting with MEL re Reply Motion to Delay Judgement research and drafting.	0.60	\$ 250.00	\$ 150.00
5/13/2015	Barvir	Meeting with MEL re Reply to Defendants' Opposition to Motion to Delay Entry of Judgment; discuss strategy and arguments; discuss also MEL research re cases permitting discovery after dismissal for catalyst based attorney fee motion.	0.60	\$ 250.00	\$ 150.00
5/13/2015	Barvir	Draft Reply to Defendants' Opposition to Motion to Delay Entry of Judgment; conduct legal research as necessary.	2.40	\$ 250.00	\$ 600.00
5/13/2015	Leidy	Draft section for Reply Motion to Delay Judgment re it is premature to argue merits of Plaintiffs' yet to be filed motion for attorneys' fees.	1.30	\$ 125.00	\$ 162.50
5/13/2015	Leidy	Conduct legal research re [REDACTED] for use in Reply to Defendants' Response Re Plaintiffs' Request to Delay Judgment.	0.30	\$ 125.00	\$ 37.50
5/13/2015	Leidy	Meeting with AMB re Reply Motion to Delay Judgement research and drafting.	0.60	\$ 125.00	\$ 75.00
5/13/2015	Quesada	Meeting with AMB re differences in tentative ruling mailed to opposing counsel.	0.30	\$ 100.00	\$ 30.00
5/14/2015	Barvir	Conduct final review and final revisions to Reply to Opposition to Motion to Delay Entry of Judgment.	1.30	\$ 250.00	\$ 325.00
5/14/2015	Barvir	Draft, review, and revise final draft Reply to Defendants' Opposition to Motion to Delay Entry of Judgment; conduct legal research as necessary.	2.70	\$ 250.00	\$ 675.00
5/14/2015	Barvir	Draft, review, and revise Reply to Defendants' Opposition to Motion to Delay Entry of Judgment; conduct legal research as necessary; insert MEL citation edits; conduct read-through with MEL and insert all edits; finalize document and forward to LLQ;	4.30	\$ 250.00	\$ 1,075.00
5/14/2015	Leidy	Review and revise Reply to Defendants' Opposition to Plaintiffs' Motion to Delay Entry of Judgment; conduct cite checking of entire motion.	1.70	\$ 125.00	\$ 212.50
5/14/2015	Quesada	Review and revise Reply to Defendants' Opposition to Motion to Delay Entry of Judgment.	0.50	\$ 100.00	\$ 50.00
5/14/2015	Quesada	Review and revise Plaintiffs' Reply to Defendants' Opposition to Motion to Delay Entry of Judgment; finalize and file and serve to opposing counsel and attorney service.	0.70	\$ 100.00	\$ 70.00
5/15/2015	Leidy	Draft memorandum summarizing all cases cited in briefing for the Motion to Delay Entry of Judgment to assist in preparation for the hearing on that motion.	1.80	\$ 125.00	\$ 225.00
5/18/2015	Barvir	Meeting with MEL re preparation for upcoming hearing re motion to delay entering judgment.	0.70	\$ 250.00	\$ 175.00
5/18/2015	Leidy	Draft summary of cases cited in all motion briefing re motion to delay entry of judgment to assist in upcoming hearing.	2.20	\$ 125.00	\$ 275.00
5/18/2015	Leidy	Meeting with AMB re preparation for upcoming hearing re motion to delay entering judgment.	0.70	\$ 125.00	\$ 87.50
5/19/2015	Barvir	Meeting with MEL re potential arguments opposing counsel will present at the upcoming hearing re Plaintiffs' motion to delay entry of judgment; discuss strategy for opposing.	0.50	\$ 250.00	\$ 125.00
5/19/2015	Barvir	Send/receive email to/from LLQ and CBM re securing court reporter for hearing re motion to delay entry of judgment.	0.10	\$ 250.00	\$ 25.00
5/19/2015	Leidy	Meeting with AMB re potential arguments opposing counsel will present at the upcoming hearing re Plaintiffs' motion to delay entry of judgment.	0.50	\$ 125.00	\$ 62.50
5/20/2015	Barvir	Receipt, review and analyze tentative ruling denying motion to delay entry of judgment and on objections to proposed judgment; draft attorney's notes; direct LLQ to contact court clerk and request oral argument remain on calendar; follow-up with LLQ re same; determine arguments to be made and prepare arguments for hearing.	2.60	\$ 250.00	\$ 650.00
5/20/2015	Barvir	Send email to opposing counsel re tentative ruling denying motion to delay entry of judgment and on objections to proposed judgment and timely request to keep oral argument on calendar; email from opposing counsel confirming receipt.	0.10	\$ 250.00	\$ 25.00
5/20/2015	Barvir	Preparation for hearing re motion to delay entry of judgment and on objections to proposed judgment; draft attorney's notes and outline argument; review and revise MEL case summaries and case outlines; prepare documents for hearing and direct LLQ to prepare hearing binder.	3.40	\$ 250.00	\$ 850.00
5/20/2015	Barvir	Meetings with SMF re hearing preparation re motion to delay entry of judgment; discuss various cases supporting right to post-judgment discovery re fee claims.	0.30	\$ 250.00	\$ 75.00
5/20/2015	Barvir	Meeting with MEL re final revisions to preparation materials to use for preparation for the upcoming hearing re motion to delay entry of judgment.	0.30	\$ 250.00	\$ 75.00
5/20/2015	Barvir	Meeting with MEL re summary of arguments made in course of briefing re motion to delay entry of judgment.	0.10	\$ 250.00	\$ 25.00
5/20/2015	Barvir	Meeting with MEL re research on [REDACTED] to help prepare for upcoming hearing.	1.00	\$ 250.00	\$ 250.00

Date	Timekeeper	Description	Hours	Rate	Amount
5/20/2015	Leidy	Meeting with AMB re final revisions to preparation materials to use for preparation for the upcoming hearing re motion to delay entry of judgment.	0.30	\$ 125.00	\$ 37.50
5/20/2015	Leidy	Meeting with AMB re research on [REDACTED] to help prepare for upcoming hearing.	1.00	\$ 125.00	\$ 125.00
5/20/2015	Leidy	Conduct legal research re [REDACTED] to help prepare for upcoming hearing.	1.40	\$ 125.00	\$ 175.00
5/20/2015	Quesada	Preparation of binders for hearing on Motion to Delay Entry of Judgment; (call Court to request hearing re tentative ruling; call CourtCall to cancel CourtCall appearance); pull cases from Westlaw for inclusion in hearing binders.	2.20	\$ 100.00	\$ 220.00
5/21/2015	Barvir	Travel to Fresno from Stanton for hearing re motion to delay entry of judgment and for leave to conduct discovery and hearing re objections to proposed judgment.	4.30	\$ 250.00	\$ 1,075.00
5/21/2015	Barvir	Preparation with MEL for hearing re motion to delay entry of judgment/leave for discovery and objections to proposed judgment.	1.00	\$ 250.00	\$ 250.00
5/21/2015	Barvir	Travel to courthouse from lunch meeting to attend motion to delay entry of judgment and for leave to conduct discovery and hearing re objections to proposed judgment.	0.30	\$ 250.00	\$ 75.00
5/21/2015	Barvir	Attend, prepare for, and participate in hearing re motion to delay entry of judgment/leave for discovery and objections to proposed judgment.	0.80	\$ 250.00	\$ 200.00
5/21/2015	Barvir	Meeting with MEL to discuss outcome of hearing re motion to delay entry of judgment/leave for discovery and objections to proposed judgment.	0.30	\$ 250.00	\$ 75.00
5/21/2015	Barvir	Travel from Fresno to Stanton after hearing re motion to delay entry of judgment and for leave to conduct discovery and hearing re objections to proposed judgment.	4.50	\$ 250.00	\$ 1,125.00
5/21/2015	Leidy	Preparation with AMB for hearing re motion to delay entry of judgment/leave for discovery and objections to proposed judgment.	1.00	\$ 125.00	\$ 125.00
5/21/2015	Leidy	Travel to Fresno from Los Angeles for hearing re motion to delay entry of judgment and for leave to conduct discovery and hearing re objections to proposed judgment.	3.40	\$ 125.00	\$ 425.00
5/21/2015	Leidy	Travel to courthouse from lunch meeting to attend motion to delay entry of judgment and for leave to conduct discovery and hearing re objections to proposed judgment.	0.30	\$ 125.00	\$ 37.50
5/21/2015	Leidy	Attend, prepare for, and participate in hearing re motion to delay entry of judgment/leave for discovery and objections to proposed judgment.	0.80	\$ 125.00	\$ 100.00
5/21/2015	Leidy	Meeting with AMB to discuss outcome of hearing re motion to delay entry of judgment/leave for discovery and objections to proposed judgment.	0.30	\$ 125.00	\$ 37.50
5/21/2015	Leidy	Travel from Fresno to Los Angeles after hearing re motion to delay entry of judgment and for leave to conduct discovery and hearing re objections to proposed judgment.	3.50	\$ 125.00	\$ 437.50
5/26/2015	Quesada	Draft letter to Courtreporting of Fresno County enclosing payment for 5/21/15 hearing at Fresno County Superior Court; finalize and mail letter; profile into imanage.	0.40	\$ 100.00	\$ 40.00
5/27/2015	Barvir	Receipt, review and analyze court order denying motion to delay entry of judgment; consider options for moving forward, discuss with MEL, and draft memorandum advising CDM and SAB of developments and strategy for post-judgment discovery; send/receive multiple emails to/from CDM and SAB re same.	1.10	\$ 250.00	\$ 275.00
5/27/2015	Barvir	Meeting with CDM, CBM, and SAB re litigation status and strategy; discuss [REDACTED].	0.20	\$ 250.00	\$ 50.00
5/29/2015	Barvir	Send/receive email to/from CBM re litigation and discovery strategy.	0.10	\$ 250.00	\$ 25.00
5/29/2015	Barvir	Receive/review/analyze case costs and review to determine which items can be claimed in bill of costs.	0.60	\$ 250.00	\$ 150.00
5/29/2015	Barvir	Send/receive multiple emails to/from LLQ and HV re preparing bill of costs; assign LLQ task of pulling case costs and preparing draft bill of costs.	0.20	\$ 250.00	\$ 50.00

	HOURS	AMOUNT
TOTAL	528.20	\$ 113,619.00

NAME	HOURS	RATE	AMOUNT
Barvir, Anna	259.70	\$ 250.00	\$ 64,925.00
Brady, Sean	49.60	\$ 275.00	\$ 13,640.00
Cubeiro, Matthew D.	39.20	\$ 125.00	\$ 4,900.00
Leidy, Margaret	124.20	\$ 125.00	\$ 15,525.00
Michel, C.D.	8.20	\$ 395.00	\$ 3,239.00
Quesada, Laura	14.00	\$ 100.00	\$ 1,400.00

Date	Timekeeper	Description	Hours	Rate	Amount
8/24/2015	Silvoso, Joseph		33.30	\$ 300.00	\$ 9,990.00

1 **PROOF OF SERVICE**

2 I, Laura Quesada, am employed in the City of Long Beach, Los Angeles County,
3 California. I am over the age eighteen (18) years and am not a party to the within action. My
4 business address is 180 East Ocean Blvd., Suite 200, Long Beach, California 90802.

5 On August 25, 2015, I served the foregoing document(s) described as:

6 **DECLARATION OF HAYDEE VILLEGAS IN SUPPORT OF
7 PLAINTIFFS' MOTION FOR ATTORNEYS' FEES; EXHIBIT B**

8 on the interested parties in this action by placing
9 [] the original
10 [X] a true and correct copy
11 thereof enclosed in sealed envelope(s) addressed as follows:

12 Mr. Jeffrey Rich
13 Deputy Attorney General
14 1300 I Street
15 Sacramento, CA 95814

16 (PERSONAL SERVICE) I caused such envelope to delivered by hand to the offices of the
17 addressee.

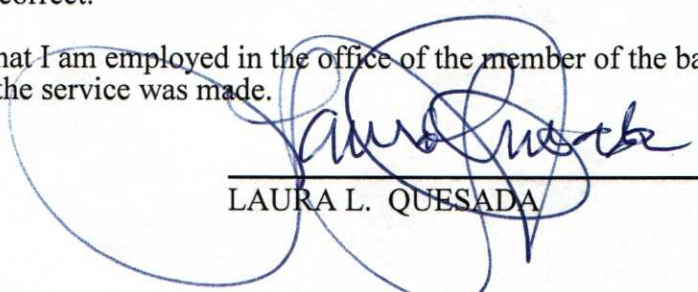
18 Executed on _____, 2015, at Long Beach, California.

19 X (OVERNIGHT MAIL) As follows: I am "readily familiar" with the firm's practice of
20 collection and processing correspondence for overnight delivery by UPS/FED-EX. Under
21 the practice it would be deposited with a facility regularly maintained by UPS/FED-EX for
22 receipt on the same day in the ordinary course of business. Such envelope was sealed and
23 placed for collection and delivery by UPS/FED-EX with delivery fees paid or provided for
24 in accordance.

25 Executed on August 25, 2015, at Long Beach, California.

26 X (STATE) I declare under penalty of perjury under the laws of the State of California that
27 the foregoing is true and correct.

28 (FEDERAL) I declare that I am employed in the office of the member of the bar of this
court at whose direction the service was made.

29 
30 _____
31 LAURA L. QUESADA