

Opposition to Motion to Dismiss

Date	Timekeeper	Description	Hours	Rate	Amount
6/10/2019	Cheuvront	Conduct research re Motion to Dismiss and Identify case law for review. Provided MMA with list of cases to begin reviewing and briefing for draft	2.00	\$325.00	\$650.00
6/10/2019	Cheuvront	Begin drafting Opposition to Motion to Dismiss and review Ninth Circuit case law for standards of court action, tests, and burden requirements	2.50	\$325.00	\$812.50
6/11/2019	Austin	Conduct research re TDC specified cases to review and research for opposition to defendant motion to dismiss.	5.50	\$170.00	\$272.00
6/11/2019	Austin	Conduct research re TDC assigned cases from defendant motion to dismiss per TDC	1.60	\$170.00	\$272.00
6/11/2019	Cheuvront	Draft sections on protected conduct, First Amendment and equal protection distinctions for Opposition to Motion to Dismiss	5.30	\$325.00	\$1,722.50
6/12/2019	Cheuvront	Draft Equal Protection argument section for opposition to Motion to Dismiss; Review cases and insert First Amendment sections of the Argument. Review Motion to Dismiss to pull statements and citation. Email SAB and AMB same.	3.00	\$325.00	\$975.00
6/12/2019	Brady	Analyze the city's motion to dismiss and draft notes re issues to address in opposing	1.00	\$475.00	\$475.00
6/12/2019	Brady	Analyze complaint and briefing in preliminary injunction motion for material to use in opposing the City's motion to dismiss; and draft related attorney notes	1.80	\$475.00	\$855.00
6/13/2019	Cheuvront	Conduct research re Jordahl and other facial challenges to First Amendment issues, backdoor issues with government	2.40	\$325.00	\$780.00
6/14/2019	Cheuvront	Draft Opposition to Motion to Dismiss. Equal Protection section	2.20	\$325.00	\$715.00
6/14/2019	Cheuvront	Conduct research re REDACT mail findings to SAB for opposition on Motion to Dismiss.	1.70	\$325.00	\$562.00
6/21/2019	Brady	Analyze notes re legal research and review responding to opposing counsel's argument that First Amendment activity is not implicated by the ordinance; and draft outline of brief opposing that argument.	4.70	\$475.00	\$2,232,50
6/21/2019	Brady	Continue to draft section of brief Opposing Defendant's argument that First Amendment activity is not implemented by the ordinance.	5.50	\$475.00	\$ 2,612.50
6/24/2019	Cheuvront	Conduct research re Roulett and speech versus conduct argument for brief.	1.50	\$325.00	\$487.50
6/24/2019	Brady	Continue to draft section of brief opposing Defendant's argument that First Amendment activity is not implicated by the ordinance; and conduct related legal research and review as questions arise in developing arguments	8.0	\$475.00	\$3,800.00
6/25/2019	Palmerin	Exchange emails with TRD re REDACTED Plaintiffs' Motion for Preliminary Injunction and Defendants' Motion to dismiss	0.10	\$170.00	\$17.00
6/25/2019	Cheuvront	Review and revise factual section of opposition to motion to dismiss; begin cite checking brief.	0.60	\$325.00	\$195.00
6/25/2019	Brady	Analyze City's arguments for why the ordinance does not violate each of the respective claims; draft notes for how to address in brief opposing motion to dismiss; draft arguments and conduct related research review as necessary.	10.10	\$475.00	\$4.797.50
6/26/2019	Palmerin	Review and Revise formatting of draft of Plaintiffs' Opposition to Defendants' Motion to Dismiss Revise per SAB's revisions and send to SAB. Revise per SAB'S further revisions and AMB's revisions.	2.30	\$170.00	\$391.00
6/26/2019	Palmerin	File and serve Plaintiffs' Opposition to Defendants' Motion to Dismiss via CM/ECF	0.20	\$170.00	\$34.00
6/26/2019	Cheuvront	Draft all citations for opposition to motion to dismiss and locate the references in the corresponding documents.	1.40	\$325.00	\$455.00
6/26/2019	Cheuvront	Review and revise final statement of facts section of opposition to motion to dismiss and combine with citations into SAB version.	0.70	\$325.00	\$227.50
6/26/2019	Cheuvront	Conduct research re REDACTED Send research to SAB for use in opposition to motion to dismiss.	3.00	\$325.00	\$975.00

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6/26/2019	Cheuvront	Review and Revise statement of facts of opposition to motion to dismiss; draft citations to documents referenced	2.60	\$325.00	845.00
6/26/2019	Barvir	Review and revise SAB draft opposition to motion to dismiss; route edits to SAB for review and approval.	1.40	\$475.00	\$665.00
6/26/2019	Brady	Draft statement of facts and conduct related research re occurrences and analyze complaint for allegations made to cite to in response to City's arguments	4.00	\$475.00	\$1,900.00
6/26/2019	Brady	Draft final version of brief opposing city's motion to dismiss.	3.50	\$475.00	\$ 1,662.50
6/26/2019	Brady	Review and revise final version of brief opposing city's motion to dismiss	2.00	\$475.00	\$950.00
			80.6		\$30,991.50