

Exhibit D
Trial Preparation

Date	Timekeeper	Description	Hours	Rate	Amount
12/17/2019	Palmerin	Review and analyze Court's Civil Trial Prep Order and distribute to team. Review Order and Central District Local Rules re court trials, calendar all relevant deadlines, and send confirming email to team.	0.70	\$170.00	\$119.00
12/17/2019	Barvir	Receipt, review and analyze amended Civil Trial Preparation Order; review court order re all dates for pretrial matters and conducting trial; exchange emails with SAB and CDM re same.	0.30	\$475.00	\$855.00
1/2/2020	Brady	Telephone conference with opposing counsel re the city's proposed settlement and potential trial Preparation	0.50	\$475.00	\$237.50
1/9/2020	Frank	Analyze authorities re how to protect the identity of the Doe plaintiff at trial; determine methods for getting the testimony in as evidence without outing the client.	1.10	\$350.00	\$385.00
1/10/2020	Brady	Telephone conference with opposing counsel re meet and confer on trial preparation	0.50	\$475.00	\$237.50
1/14/2020	Barvir	Begin drafting Joint Pretrial Conference Order; pull template from Central District rules and begin inserting case specific information	2.10	\$475.00	\$997.50
1/14/2020	Brady	Meeting with team re trial	2.00	\$475.00	\$950.00
1/14/2020	Dale	Meeting with AMB, AAF, KTM, and CDM re trial REDACTED	1.80	\$550.00	\$990.00
1/14/2020	Michel	Meeting with AMB, JRD, SAB, KTM, and AAF re REDACTED	2.00	\$650.00	\$1,300.00
1/15/2020	Palmerin	Draft Initial Disclosures and send to AMB. Draft template for Exhibit List and send to TDC. Draft template for Memorandum of Contentions of Fact and Law and send to AAF.	0.90	\$170.00	\$153.00
1/15/2020	Cheuvront	Draft exhibit list per AMB; incorporate list of all exhibits from motion for preliminary injunction into document with explanation re why each document should be included	1.70	\$325.00	\$552.20
1/15/2020	Cheuvront	Review additional potential evidence to determine whether to include on Joint Exhibit List and email to AMB	1.00	\$325.00	\$325.00
1/15/2020	Barvir	Receipt, review and analyze KTM additional analysis of Ninth Circuit case law re damages available in 1983 civil rights action.	0.40	\$475.00	\$190.00
1/15/2020	Barvir	Receipt, review and analyze documents provided by TDC and determine which to include in Joint Exhibit List; exchange emails with TDC re same.	0.40	\$475.00	\$190.00
1/16/2020	Cheuvront	Conduct research re exhibits to go in the exhibit list. Pull information from city council files for possible repeal of the ordinance, update information that has come out in the past several months, check on social media posts, check donations to city council members, pull information on FedEx prohibition from 2018 by Council Member O'Farrell. Email to AMB re REDACTED	3.00	\$325.00	\$975.00
1/16/2020	Frank	Continue to draft memorandum of contentions of fact and law in preparation for trial.	4.20	\$350.00	\$1,470.00
1/16/2020	Barvir	Review and revise TDC draft Joint Exhibit List; also pull new legislative history documents from LACityClerk Connect to produce and include in exhibit list.	0.60	\$475.00	\$285.00
1/17/2020	Frank	Continued to draft memorandum of contentions of fact and law in preparation for trial	2.00	\$350.00	\$700.00
1/17/2020	Barvir	Draft pretrial documents to prepare for filing deadline in case REDACTED	4.40	\$475.00	\$2,090.00
1/17/2020	Brady	Telephone conference with opposing counsel re meet and confer re trial	0.30	\$475.00	\$142.50
1/20/2020	Barvir	Begin to review/revise AAF draft Memorandum of Contentions of Fact and Law; revise elements of all causes of action; revise elements of all defenses; draft section re evidence and argument in opposition to affirmative defenses	6.10	\$475.00	\$ 2,897.50

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1/21/2020	Palmerin	Revise Plaintiffs' Exhibit List per SAB. Review and format Plaintiffs' Witness List, convert to pdf, and save on my desktop for filing. Review, format, and add table of authorities on Memorandum of Contentions of Fact and Law and send to AMB. Revise Plaintiffs' Exhibit List per AMB, convert to pdf, and save on my desktop for filing.	0.50	\$170.00	\$85.00
1/21/2020	Barvir	Review/revise AAF draft Memorandum of Contentions of Fact and Law; revise elements of all causes of action; revise elements of all defenses; draft section re evidence and argument in opposition to affirmative defenses; draft sections re demand for jury trial, germane issues of law, and evidentiary issues; pull jury instructions and case law to include as citations in support of all elements and arguments; incorporate SAB suggested edits; proofread entire document and route to LP for formatting and filing.	6.80	\$475.00	\$3,230.00
1/21/2020	Barvir	Review/revise TDC and SAB draft Plaintiffs' Exhibit List; review legislative file for challenged ordinance and confirm that all documentary evidence is included; revise list to include all documents identified by City in Defendants' Exhibit List; approve final list and route to LP for formatting and filing.	1.60	\$475.00	\$760.00
1/21/2020	Brady	Analyze draft memorandum of contentions of fact and law required by court rules and provide feedback re revisions to make.	1.70	\$475.00	\$807.50
1/21/2020	Brady	Finalize exhibit list to be filed with court as required by rules for AMB's review.	3.00	\$475.00	\$1,425.00
1/21/2020	Michel	Telephone conference with AMB and SAB re litigation status and case strategy, as well as handling pending deadlines, in light of SAB most recent telephone conference with W. Brewer.	0.30	\$650.00	\$195.00
1/22/2020	Frank	Draft pre trial conference order.	2.70	\$350.00	\$945.00
1/22/2020	Barvir	Case Management; review case file and determine all pending litigation deadlines and research or writing projects that must be completed; send email to KTM, AAF, MMA, and TDC re same	0.30	\$475.00	\$142.50
1/23/2020	Frank	Analyze authorities REDACTED route findings and analysis to AMB for use in preparing joint Pretrial conference order.	0.70	\$ 350.00	\$ 245.00
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