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C.D. Michel – S.B.N. 144258
Sean A. Brady – S.B.N. 262007
MICHEL & ASSOCIATES, P.C.
180 East Ocean Blvd., Suite 200
Long Beach, CA 90802
Telephone: (562) 216-4444
Facsimile: (562) 216-4445
Email: sbrady@michellawyers.com

Attorneys for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SACRAMENTO

DAVID GENTRY, JAMES PARKER,
MARK MIDLAM, JAMES BASS, and
CALGUNS SHOOTING SPORTS
ASSOCIATION,

Plaintiffs and Petitioners,

v.

XAVIER BECERRA, in His Official
Capacity as Attorney General For the State
of California; STEPHEN LINDLEY, in
His Official Capacity as Acting Chief for
the California Department of Justice,
BETTY T. YEE, in Her Official Capacity
as State Controller, and DOES 1 - 10,

Defendants and Respondents.

Case No. 34-2013-80001667

**DECLARATION OF HAYDEE VILLEGAS IN
SUPPORT OF PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES**

(Filed concurrently with Notice of Motion &
Motion, Proposed Order, Request for Judicial
Notice, Declaration of Anna M. Barvir, Declaration
of Sean A. Brady, Declaration of Alexander A.
Frank, Declaration of Scott M. Franklin,
Declaration of C.D. Michel, Declaration of Albert
E. Peacock, III, and, Exhibits A-I)

Hearing Date: January 14, 2022
Hearing Time: 10:00 a.m.
Department: 21
Judge: Hon. Shelleyanne W.L. Chang

Trial Date: August 24, 2018
Action Filed: October 16, 2013

FILED
Superior Court Of California,
Sacramento
10/12/2021
tcrowther
By _____, Deputy
Case Number:
34-2013-80001667

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remove such hours from the final billing report on which Plaintiffs’ fee request is based.

9. At that time, under Ms. Barvir’s direction, I also created “project references” with the Timeslips program to categorize each slip according to the project for which each task described was performed. From that point on, all slips included a project reference approved by Ms. Barvir.

10. On or about October 11, 2021, I used Timeslips to generate a final report of the billing records on which Plaintiffs’ fee request is based. The generated document includes a detailed description of the work each billing professional performed on this case and the time spent on each merits task between May 2013 and October 2021, as well as each task related to the motion for attorneys’ fees up through April 30, 2020. Attached as **Exhibit A** is a true and accurate copy of the billing reports for which fee recovery is sought in this matter, redacted only to protect attorney-client privileged information, work product, and attorneys’ mental impressions.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct. Executed this 12th day of October, at Long Beach, California.



Haydee Villegas
Declarant

EXHIBIT A

Date	Timekeeper	Description	Hours	Rate	Amount
5/9/2013	Brady	Telephone conference with attorneys re attacking SB 140 and discuss strategy with GSM in light thereof re how to proceed with litigation.	1.00	\$ 350.00	\$ 350.00
5/9/2013	McRoberts	Telephone conference with attorneys re attacking SB 140 and discuss strategy with SAB in light thereof re how to proceed with litigation.	1.00	\$ 400.00	\$ 400.00
5/9/2013	McRoberts	Review case files on Ventura County Prop 172 case (with Howard Jarvis atty, Tom Hiltachk) re improper allocation of tax/fee revenues; follow-up analysis of possible writ of mandate petition.	1.40	\$ 400.00	\$ 560.00
5/10/2013	McRoberts	Analyze how to challenge SB 140 in state court to stop state from converting DROS fees to other uses; meet with SDZ re same, and consider his latest research on possible state claims.	0.30	\$ 400.00	\$ 120.00
5/10/2013	McRoberts	Meeting with SDZ and LMM re challenging SB 140; discuss [REDACTED]; discuss [REDACTED]	0.30	\$ 400.00	\$ 120.00
5/10/2013	McRoberts	Research on Cal. Civil code 526a taxpayer actions against state (review research by LMM re same; email to SAB et al., re [REDACTED])	0.40	\$ 400.00	\$ 160.00
5/13/2013	Brady	Meeting with LMM re researching and findings re issues with bringing state court action in addition to federal case.	0.20	\$ 350.00	\$ 70.00
5/28/2013	Brady	Meet with LMM to discuss research progress re [REDACTED] meet with LMM re memo and compiled research re SB 140	0.20	\$ 350.00	\$ 70.00
6/6/2013	Brady	Analyze state law DROS lawsuit with LMM and instruct on further research to conduct.	0.60	\$ 350.00	\$ 210.00
6/10/2013	Brady	Meeting with CDM re [REDACTED] draft attorney notes re details and delegate to LMM.	0.40	\$ 350.00	\$ 140.00
6/10/2013	Michel	Meeting with SAB re [REDACTED]	0.20	\$ 650.00	\$ 130.00
6/19/2013	Brady	Meeting with LMM re finalizing research to include in complaint; follow up re same.	0.50	\$ 350.00	\$ 175.00
6/20/2013	Brady	Meeting with LMM re status of research and issues to develop in preparing arguments in complaint.	0.30	\$ 350.00	\$ 105.00
6/26/2013	Brady	Receipt, review and analyze LMM's legal memorandum re basis for state court challenge to SB 140 in order to finalize causes of action in complaint.	1.40	\$ 350.00	\$ 490.00
6/26/2013	Brady	Analyze research for drafting complaint challenging SB 140.	1.50	\$ 350.00	\$ 525.00
6/27/2013	Brady	Analyze LMM's follow up research and draft notes for further research to conduct re [REDACTED]	0.20	\$ 350.00	\$ 70.00
6/27/2013	Brady	Continue to analyze research re [REDACTED] and drafting sections of complaint therefrom.	4.60	\$ 350.00	\$ 1,610.00
6/28/2013	Brady	Meet with LMM to discuss strategy behind [REDACTED], analyzing legislative history in furtherance of determining legislative intent of [REDACTED]	0.20	\$ 350.00	\$ 70.00
6/28/2013	Brady	Continue drafting complaint.	4.80	\$ 350.00	\$ 1,680.00
7/1/2013	Nunez	Receipt, review and analyze, save, print, fax, email and mail public records act requests re: Communications regarding Attorney General's Communications regarding Decrease in DROS Fee.	0.40	\$ 170.00	\$ 68.00
7/2/2013	Brady	Meeting with LMM re research task to locate legislative history of DROS fee; discuss scope, timeline, and nature of assignment.	0.20	\$ 350.00	\$ 70.00
7/2/2013	Brady	Meeting with LMM to discuss line of research to be completed in furtherance of naming defendants in SB140 case; review email from LMM re same.	0.20	\$ 350.00	\$ 70.00
7/2/2013	Brady	Analyze article re Prop 13, the basis of this lawsuit, to discuss with CDM.	1.20	\$ 350.00	\$ 420.00
7/2/2013	Brady	Draft complaint.	3.00	\$ 350.00	\$ 1,050.00
7/3/2013	Brady	Conduct research re DOJ opinions on diverting funds from special accounts for us in drafting complaint.	1.30	\$ 350.00	\$ 455.00
7/5/2013	Brady	Exchange emails with LMM re [REDACTED]	0.20	\$ 350.00	\$ 70.00
7/5/2013	Brady	Receipt, review and analyze PRAR response from AOL re communications with DOJ re lowering DROS Fee, and forward to LMM with instructions for follow up.	0.30	\$ 350.00	\$ 105.00
7/5/2013	Nunez	Receipt, review and analyze email with responsive documents from the Office of Administrative Law to public records act requests re: Communications re: Attorney General's Decrease in DROS Fee, combine, save, print and forward to team.	0.30	\$ 170.00	\$ 51.00
7/8/2013	Brady	Meeting with LMM to discuss status of research and how to proceed.	0.20	\$ 350.00	\$ 70.00
7/8/2013	Brady	Exchange emails with LMM re locating recent SCOTUS opinion re ruling on regulatory, property fees to determine precedent effect on SB 140 claims.	0.20	\$ 350.00	\$ 70.00
7/9/2013	Brady	Draft and send email to LMM re [REDACTED]	0.30	\$ 350.00	\$ 105.00
7/11/2013	Brady	Draft email to LMM in response to inquiry as to whether [REDACTED]	0.20	\$ 350.00	\$ 70.00
7/16/2013	Brady	Continue to draft complaint.	2.00	\$ 350.00	\$ 700.00
7/18/2013	Brady	Draft complaint.	4.80	\$ 350.00	\$ 1,680.00
7/19/2013	Brady	Exchange emails with LMM re response to draft of jurisdiction and venue as well as adding another defendant to the complaint.	0.10	\$ 350.00	\$ 35.00
7/19/2013	Brady	Exchange emails with LMM re confirmation that the California State Controller's Office is responsible for disbursement of funds to include in complaint.	0.20	\$ 350.00	\$ 70.00
7/19/2013	Brady	Exchange emails with LMM re status update of legislative history re CCR 4001.	0.20	\$ 350.00	\$ 70.00
7/22/2013	Brady	Analyze issues with [REDACTED] to determine whether [REDACTED] with JRD and JAS.	0.30	\$ 350.00	\$ 105.00
7/22/2013	Brady	Meeting with JAS and JRD re [REDACTED]	0.40	\$ 350.00	\$ 140.00
7/22/2013	Brady	Continue to draft complaint.	5.10	\$ 350.00	\$ 1,785.00

Date	Timekeeper	Description	Hours	Rate	Amount
7/23/2013	Brady	Meeting with LMM to determine if the treasurer or controller should be a named defendant.	0.40	\$ 350.00	\$ 140.00
7/25/2013	Brady	Continue to draft complaint.	5.50	\$ 350.00	\$ 1,925.00
7/26/2013	Brady	Conduct correspondence with CDM and E. Worley re plaintiffs for this lawsuit and strategy for filing.	0.50	\$ 350.00	\$ 175.00
7/26/2013	Michel	Conduct correspondence with SAB and E. Worley re plaintiffs for this lawsuit and strategy for filing.	0.50	\$ 650.00	\$ 325.00
7/29/2013	Brady	Continue to draft complaint.	2.00	\$ 350.00	\$ 700.00
7/30/2013	Brady	Meeting with SDZ re [REDACTED].	0.30	\$ 350.00	\$ 105.00
7/31/2013	Brady	Exchange emails with LMM re application of CCP 1060 to cause of action and statements of venue and jurisdiction.	0.20	\$ 350.00	\$ 70.00
7/31/2013	Brady	Telephone conference with LMM to discuss [REDACTED].	0.20	\$ 350.00	\$ 70.00
8/7/2013	Brady	Analyze and review memo from LMM re confirmation of availability of writ of mandate in the complaint.	1.00	\$ 350.00	\$ 350.00
8/7/2013	Brady	Conduct legal research and review re [REDACTED].	2.40	\$ 350.00	\$ 840.00
8/7/2013	Brady	Review/Revise Complaint.	2.50	\$ 350.00	\$ 875.00
8/8/2013	Brady	Review/Revise complaint based on research findings.	1.50	\$ 350.00	\$ 525.00
8/9/2013	Brady	Telephone conference with GSM to discuss proposed revisions to and questions raised by complaint.	1.00	\$ 350.00	\$ 350.00
8/9/2013	McRoberts	Telephone conference with SAB to discuss proposed revisions to and questions raised by complaint.	1.00	\$ 400.00	\$ 400.00
8/9/2013	McRoberts	Receipt, review and analyze SAB draft of state complaint and petition; mark up and begin revisions of same; email to SAB and CDM re same and areas needing attention.	2.50	\$ 400.00	\$ 1,000.00
8/10/2013	McRoberts	Receipt, review and analyze SAB's revised draft of complaint and petition; mark up same.	1.20	\$ 400.00	\$ 480.00
8/11/2013	McRoberts	Draft new introductory paragraphs, describing complaint and petition generally, and the relief sought; revise and edit complaint.	4.80	\$ 400.00	\$ 1,920.00
8/12/2013	Brady	Exchange emails with LMM re [REDACTED].	0.10	\$ 350.00	\$ 35.00
8/12/2013	Brady	Review and analyze memo from LMM re [REDACTED].	0.30	\$ 350.00	\$ 105.00
8/12/2013	Brady	Review/Revise complaint in light of GSM's suggested revisions and send e-mail to GSM explaining my thoughts on such.	2.20	\$ 350.00	\$ 770.00
8/12/2013	McRoberts	Review and respond to SAB emails re complaint and petition, causes of action, prayer for relief, and [REDACTED].	0.20	\$ 400.00	\$ 80.00
8/12/2013	McRoberts	Analyze case law [REDACTED] (cases) per SAB emails re causes of action and prayer for relief; review Cal. Const. art. III A section 3, and Prop 13 and 26 re same.	1.30	\$ 400.00	\$ 520.00
8/12/2013	McRoberts	Continue revising and editing complaint and petition; analyze and revise causes of action and prayer for relief.	3.60	\$ 400.00	\$ 1,440.00
8/13/2013	Brady	Telephone conference with GSM re points to include in complaint and structuring causes of action to be more effective.	0.80	\$ 350.00	\$ 280.00
8/13/2013	McRoberts	Telephone conference with SAB re points to include in complaint and structuring causes of action to be more effective.	0.80	\$ 400.00	\$ 320.00
8/13/2013	McRoberts	Review SAB email re complaint; review most recent draft of same and SAB annotations up to causes of action; revise same.	1.10	\$ 400.00	\$ 440.00
8/13/2013	McRoberts	Review [REDACTED] [REDACTED] email notes on same to SAB and to file for use in complaint and later briefing.	1.30	\$ 400.00	\$ 520.00
8/14/2013	Brady	Revise complaint based on changes in theory for attacking DROS Fee discussed with GSM.	0.50	\$ 350.00	\$ 175.00
8/14/2013	McRoberts	Analyze SAB reassessment of causes of action and suggestion that [REDACTED] respond to same.	0.30	\$ 400.00	\$ 120.00
8/15/2013	Brady	Conduct legal research and review re [REDACTED].	1.90	\$ 350.00	\$ 665.00
8/18/2013	Brady	Review/Revise complaint.	4.10	\$ 350.00	\$ 1,435.00
8/20/2013	Brady	Review/Revise complaint.	3.20	\$ 350.00	\$ 1,120.00
8/20/2013	McRoberts	Send/receive emails to/from SAB re revisions to complaint/petition.	0.30	\$ 400.00	\$ 120.00
8/20/2013	McRoberts	Send/receive emails to/from SAB re revisions to complaint/petition.	0.30	\$ 400.00	\$ 120.00
8/20/2013	McRoberts	Review revised causes and prayer for relief; email to SAB re same.	0.70	\$ 400.00	\$ 280.00
8/21/2013	Brady	Review/Revise complaint.	2.50	\$ 350.00	\$ 875.00
8/21/2013	McRoberts	Send/receive email to/from SAB re status of complaint/writ; brief review of same.	0.60	\$ 400.00	\$ 240.00
8/22/2013	Brady	Meet with LMM to review cite checking that needs to be done for the complaint and discuss 2002 California budgetary supplement.	0.20	\$ 350.00	\$ 70.00
8/22/2013	Brady	Telephone conference with GSM re status of complaint and issues needed to be addressed for finalizing.	0.30	\$ 350.00	\$ 105.00
8/22/2013	Brady	Analyze DOJ materials re expenditures from DROS Fund for inclusion in complaint.	2.00	\$ 350.00	\$ 700.00
8/22/2013	McRoberts	Telephone conference with SAB re status of complaint and issues needed to be addressed for finalizing.	0.30	\$ 400.00	\$ 120.00
8/22/2013	McRoberts	Review/Revise Complaint/Writ.	1.70	\$ 400.00	\$ 680.00
8/23/2013	McRoberts	Further revisions, analysis of complaint/writ; multiple emails to SAB re suggested changes; work on finalizing pleading.	2.50	\$ 400.00	\$ 1,000.00
8/29/2013	Brady	Instruct SPO to conduct legal research re [REDACTED] for use in preliminary injunction motion.	0.10	\$ 350.00	\$ 35.00
8/29/2013	Brady	Draft correspondence to [REDACTED] requesting [REDACTED].	0.10	\$ 350.00	\$ 35.00
9/3/2013	Brady	Send email to CDM re status of qualifying plaintiffs for lawsuit.	0.10	\$ 350.00	\$ 35.00
9/3/2013	Brady	Meeting with SPO re [REDACTED] for purposes of developing argument in motion for preliminary injunction.	0.50	\$ 350.00	\$ 175.00
9/3/2013	Brady	Analyze the legislative history file of SB 819 for material to include in preliminary injunction motion.	1.50	\$ 350.00	\$ 525.00
9/3/2013	Michel	Exchange emails with SAB re status of qualifying plaintiffs for lawsuit.	0.10	\$ 650.00	\$ 65.00
9/4/2013	Brady	Meeting with SPO re status of research and follow research to conduct re [REDACTED].	0.60	\$ 350.00	\$ 210.00
9/5/2013	Brady	Review/Revise final version of complaint with GSM's comments.	1.80	\$ 350.00	\$ 630.00
9/5/2013	Brady	Conduct correspondence with [REDACTED] re [REDACTED].	2.50	\$ 350.00	\$ 875.00

Date	Timekeeper	Description	Hours	Rate	Amount
9/5/2013	McRoberts	Review/Revise Complaint.	3.50	\$ 400.00	\$ 1,400.00
9/7/2013	Brady	Exchange emails with GSM re changes to complaint, and remaining questions.	0.20	\$ 350.00	\$ 70.00
9/7/2013	Brady	Review/Revise complaint per GSM's revisions and provide feedback for him to finalize it.	1.20	\$ 350.00	\$ 420.00
9/7/2013	McRoberts	Send/receive emails to/from SAB re changes to complaint, and remaining questions; also review portion of legislative history from SAB that shows state used General Fund for APPS enforcement before shifting the costs of enforcement to DROS account -- and knew it was likely a tax.	0.40	\$ 400.00	\$ 160.00
9/7/2013	McRoberts	Review/Revise Complaint, including paragraphs added from legislative history research; email to SAB and CDM re finalizing same.	1.30	\$ 400.00	\$ 520.00
9/7/2013	Michel	Exchange emails with GSM and SAB re finalizing Complaint.	0.40	\$ 650.00	\$ 260.00
9/9/2013	Brady	Review/Revise memorandum from SPO re [REDACTED]	0.80	\$ 350.00	\$ 280.00
9/9/2013	Brady	Analyze legislative history of SB 140 and draft attorney notes re thoughts and impression of such for use in motion for preliminary injunction.	2.20	\$ 350.00	\$ 770.00
9/9/2013	Nunez	Conduct research re [REDACTED] and forward to SAB.	0.70	\$ 170.00	\$ 119.00
9/10/2013	Brady	Exchange emails with GSM re changes to final pleading.	0.20	\$ 350.00	\$ 70.00
9/10/2013	Brady	Meet with SPO to discuss memo re: Potential arguments for and against SB 819 being a valid regulatory fee	0.30	\$ 350.00	\$ 105.00
9/10/2013	McRoberts	Review most recent draft of complaint and petition, and additions re previous funding of APPS program from General Fund; email to SAB re changes to final pleading.	0.80	\$ 400.00	\$ 320.00
9/13/2013	Brady	Review/Revise complaint per GSM's suggestions.	1.30	\$ 350.00	\$ 455.00
9/16/2013	Brady	Review/Revise complaint and prepare for filing.	1.70	\$ 350.00	\$ 595.00
9/16/2013	Nunez	Draft Legal Solutions case profile, draft Summons, Civil Case Cover Sheet for new case filing.	1.50	\$ 170.00	\$ 255.00
9/17/2013	Brady	Meeting with SPO re legal research to conduct for preliminary injunction motion.	0.30	\$ 350.00	\$ 105.00
9/17/2013	Nunez	Conduct research re Sacramento Superior Court Petition for Writ of Mandamus local rules, and Howard Jarvis case filings designating case complex and forwarding to Writ departments, print out all local rules applicable, along with Howard Jarvis filings and email and provide hard copies to SAB for review.	2.00	\$ 170.00	\$ 340.00
9/18/2013	Brady	Meeting with JRD and CDM re further strategy for fashioning lawsuit.	0.40	\$ 350.00	\$ 140.00
9/18/2013	Brady	Analyze strategy for filing complaint in Sacramento as writ with CDM and JRD to confirm plan and determine issues needed to be resolved before making final decision.	0.90	\$ 350.00	\$ 315.00
9/18/2013	Brady	Conduct legal research and review re [REDACTED] and analyze issues with SPO.	1.30	\$ 350.00	\$ 455.00
9/18/2013	McRoberts	Analyze [REDACTED]. Discuss same with SAB. Also discuss simplifying case by [REDACTED] rather than [REDACTED]	0.80	\$ 400.00	\$ 320.00
9/18/2013	McRoberts	Preparation of pleadings: assist SAB in finalizing writ and complaint for declaratory and injunctive relief; revise and edit same.	2.80	\$ 400.00	\$ 1,120.00
9/18/2013	Michel	Meeting with JRD and SAB re further strategy for fashioning lawsuit.	0.40	\$ 650.00	\$ 260.00
9/18/2013	Michel	Meeting with SAB and JRD re strategy for filing complaint in Sacramento as writ.	0.40	\$ 650.00	\$ 260.00
9/19/2013	Brady	Meeting with GSM re determining whether [REDACTED] follow up re same.	0.40	\$ 350.00	\$ 140.00
9/19/2013	Brady	Conduct legal research and review re writs and discuss with SPO and GSM whether [REDACTED]	1.00	\$ 350.00	\$ 350.00
9/19/2013	McRoberts	Meeting with SAB re determining whether to fashion lawsuit as a writ or injunction.	0.20	\$ 400.00	\$ 80.00
9/19/2013	McRoberts	Meeting with SAB re determining whether [REDACTED] follow-up meeting with research attorney SPO and SAB re same.	0.30	\$ 400.00	\$ 120.00
9/20/2013	Brady	Meet with SPO re: legal research on writ of mandate; [REDACTED]	0.40	\$ 350.00	\$ 140.00
9/24/2013	Brady	Meeting with SPO and CDM re filing complaint with writ of mandate.	0.40	\$ 350.00	\$ 140.00
9/24/2013	Brady	Exchange emails with SPO re answers to questions re adding writ of mandate to the complaint.	0.60	\$ 350.00	\$ 210.00
9/24/2013	McRoberts	Final review of options in filing complaint and petition with SAB; review SPO's memorandum re same and writ practice in Sacramento; meet with CDM re same.	0.50	\$ 400.00	\$ 200.00
9/24/2013	Michel	Exchange emails with CA and SAB re status of filing and service for complaint.	0.20	\$ 650.00	\$ 130.00
9/24/2013	Michel	Meeting with GSM re filing complaint and petition.	0.20	\$ 650.00	\$ 130.00
9/24/2013	Michel	Meeting with SAB re finalizing complain.	0.30	\$ 650.00	\$ 195.00
9/24/2013	Michel	Meeting with SPO and SAB re filing complaint with writ of mandate.	0.40	\$ 650.00	\$ 260.00
9/24/2013	Nunez	Send/receive email to/from CDM and SAB re: status of filing and service for complaint.	0.20	\$ 170.00	\$ 34.00
9/24/2013	Nunez	Receipt, review and analyze, revise, format, finalize and prepare for filing Summons, Civil Case Cover Sheet, and Complaint for Declaratory Relief.	1.70	\$ 170.00	\$ 289.00
9/25/2013	Brady	Exchange e-mails with JRD and CDM re plaintiff standing.	0.10	\$ 350.00	\$ 35.00
9/25/2013	Brady	Meet with SPO to discuss memo re: potential argument for brief.	0.40	\$ 350.00	\$ 140.00
9/25/2013	Michel	Exchange e-mails with JRD and SAB re plaintiff standing.	0.10	\$ 650.00	\$ 65.00
9/25/2013	Michel	Meeting with SAB re [REDACTED]	0.20	\$ 650.00	\$ 130.00
9/27/2013	Brady	Meeting with SMF re analyzing arguments in complaint and conducting legal research and review to develop arguments for preliminary injunction.	1.00	\$ 350.00	\$ 350.00
9/27/2013	Franklin	Meeting with SAB re analyzing arguments in complaint and conducting legal research and review to develop arguments for preliminary injunction.	1.00	\$ 375.00	\$ 375.00
9/30/2013	Franklin	Review file and analyze.	0.90	\$ 375.00	\$ 337.50
9/30/2013	Nunez	Send/receive email to/from SAB and Anthony Hakl re: filing and service of new complaint.	0.30	\$ 170.00	\$ 51.00
10/1/2013	Franklin	Strategy meeting with SAB re next steps, staffing litigation tasks and potential preliminary injunction brief.	0.60	\$ 375.00	\$ 225.00
10/1/2013	Franklin	Continue review of file in preparation for drafting discovery.	3.50	\$ 375.00	\$ 1,312.50
10/1/2013	Nunez	Conduct research re on courts website, telephone calls to court clerk and attorney service re: status of court officially filing case.	0.60	\$ 170.00	\$ 102.00
10/7/2013	Brady	Analyze issues re bringing a motion for preliminary injunction with SMF, in order to make proposal to CDM.	0.40	\$ 350.00	\$ 140.00

Date	Timekeeper	Description	Hours	Rate	Amount
10/7/2013	Brady	Meet with SMF re strategy for handling [REDACTED].	0.40	\$ 350.00	\$ 140.00
10/7/2013	Franklin	Meet with SAB re strategy for handling [REDACTED].	0.40	\$ 375.00	\$ 150.00
10/7/2013	Michel	Meeting with SAB re proposal for bringing a motion for preliminary injunction.	0.10	\$ 650.00	\$ 65.00
10/7/2013	Nunez	Telephone calls to court and attorney service to check on status of officially filing complaint.	0.20	\$ 170.00	\$ 34.00
10/8/2013	Brady	Receive and review and respond to correspondence from SMF re reasons for bringing MPI.	0.20	\$ 350.00	\$ 70.00
10/8/2013	Franklin	Analyze PLF's cap and trade lawsuit to determine its potential effect on case law related to proposition 26.	1.20	\$ 375.00	\$ 450.00
10/9/2013	Brady	Analyze memo re viability of a preliminary injunction in order to decide whether to bring one here.	0.20	\$ 350.00	\$ 70.00
10/9/2013	Brady	Meet with SMF re possible [REDACTED].	0.30	\$ 350.00	\$ 105.00
10/9/2013	Brady	Meeting with CDM and SMF re preparing discovery plan.	0.40	\$ 350.00	\$ 140.00
10/9/2013	Franklin	Meeting with SAB re potential [REDACTED].	0.30	\$ 375.00	\$ 112.50
10/9/2013	Franklin	Meeting with SAB and CDM re preparing discovery plan.	0.40	\$ 375.00	\$ 150.00
10/9/2013	Michel	Meeting with SAB and SMF re preparing discovery plan.	0.40	\$ 650.00	\$ 260.00
10/10/2013	Brady	Coordinate strategy for discovery and dispositive motions with SMF and research tasks related thereto with SPO.	1.10	\$ 350.00	\$ 385.00
10/10/2013	Franklin	Meet with SAB to coordinate strategy for discovery and dispositive motions.	0.70	\$ 375.00	\$ 262.50
10/10/2013	Nunez	Multiple telephone calls to court clerk to check status of case filing.	0.20	\$ 170.00	\$ 34.00
10/11/2013	Brady	Exchange emails with SMF re various research and strategy issues needing follow up re [REDACTED].	2.30	\$ 350.00	\$ 805.00
10/11/2013	Franklin	Send status email to SAB re various research and strategy issues needing follow up re [REDACTED]; research re same.	2.30	\$ 375.00	\$ 862.50
10/14/2013	Brady	Meet with SMF re looking for doctrine to apply to [REDACTED].	0.30	\$ 350.00	\$ 105.00
10/14/2013	Brady	Analyze issues re arguing for a [REDACTED].	0.40	\$ 350.00	\$ 140.00
10/14/2013	Brady	Meet again with SMF re looking for doctrine to apply [REDACTED].	0.40	\$ 350.00	\$ 140.00
10/14/2013	Franklin	Meet with SAB re looking for doctrine to apply [REDACTED].	0.30	\$ 375.00	\$ 112.50
10/14/2013	Franklin	Meet with outside attorney to evaluate possibility of raising review standard without implicating second amendment right.	0.50	\$ 375.00	\$ 187.50
10/14/2013	Franklin	Meet again with SAB re looking for [REDACTED] research re same.	0.80	\$ 375.00	\$ 300.00
10/14/2013	Nunez	Telephone calls to and from attorney service re: status of filing of Complaint.	0.20	\$ 170.00	\$ 34.00
10/15/2013	Brady	Exchange emails with SMF re preliminary injunction memo.	0.30	\$ 350.00	\$ 105.00
10/15/2013	Franklin	Confirm ability to raise legal arguments, not based on disputed facts, for the first time on appeal as to ability of plaintiffs to argue for heightened standard of review for firearms related matters; research [REDACTED] revise preliminary injunction memo; email SAB re same.	1.50	\$ 375.00	\$ 562.50
10/15/2013	Franklin	Analyze discovery from federal companion case (Bauer) to help set up discovery plan; commence work on discovery plan.	3.50	\$ 375.00	\$ 1,312.50
10/16/2013	Nunez	Telephone calls from and to Nationwide Attorney Service re: status of filing case.	0.20	\$ 170.00	\$ 34.00
10/16/2013	Nunez	Send/receive email to/from Nationwide Attorney Service re: status of filing case.	0.20	\$ 170.00	\$ 34.00
10/16/2013	Nunez	Conduct research re [REDACTED] and forward findings to team.	0.50	\$ 170.00	\$ 85.00
10/17/2013	Nunez	Send/receive email to/from team informing them that all defendants have been served with complaint and supporting documents.	0.10	\$ 170.00	\$ 17.00
10/17/2013	Nunez	Send/receive email to/from Nationwide re: confirmation that Complaint and supporting documents were served on all parties.	0.30	\$ 170.00	\$ 51.00
10/18/2013	Brady	Analyze issues re discovery with SMF.	0.60	\$ 350.00	\$ 210.00
10/18/2013	Franklin	Analyze issues re discovery with SAB.	0.60	\$ 375.00	\$ 225.00
10/18/2013	Franklin	Continue to analyze discovery from federal companion case (Bauer) to help set up discovery plan in this case and work on discovery plan.	6.00	\$ 375.00	\$ 2,250.00
10/21/2013	Nunez	Send/receive email to/from attorney service, SAB and SMF re: service of process and problem with conflicting case numbers on initial court documents, need to contact opposing counsel and court.	0.30	\$ 170.00	\$ 51.00
10/22/2013	Nunez	Receipt, review and analyze, emails from and to attorney service, CDM, SAB and SMF re: correcting wrong case number on Summons and reserving defendants with lawsuit.	0.50	\$ 170.00	\$ 85.00
10/25/2013	Franklin	Meet with SAB re [REDACTED].	0.20	\$ 375.00	\$ 75.00
10/29/2013	Franklin	Prepare memo re options for Bauer and Gentry.	1.30	\$ 375.00	\$ 487.50
10/31/2013	Franklin	Continue drafting memo re options with Gentry and Bauer cases re discovery.	8.50	\$ 375.00	\$ 3,187.50
11/1/2013	Franklin	Complete drafting memo re options with Gentry cases re discovery.	2.40	\$ 375.00	\$ 900.00
11/4/2013	Franklin	Complete memo re abstention and effect on discovery options in Gentry.	2.00	\$ 375.00	\$ 750.00
11/9/2013	Franklin	Commence drafting RFA.	0.70	\$ 375.00	\$ 262.50
11/11/2013	Brady	Meeting with SMF re discovery plan.	0.20	\$ 350.00	\$ 70.00
11/11/2013	Franklin	Meet with SAB re deciding strategy for propounding discovery on state plaintiffs.	0.20	\$ 375.00	\$ 75.00
11/11/2013	Franklin	Continue drafting RFAs.	0.90	\$ 375.00	\$ 337.50
11/12/2013	Franklin	Continue drafting RFA, research re same re using RFAs effectively to lock DOJ into admissions.	6.10	\$ 375.00	\$ 2,287.50
11/13/2013	Brady	Analyze discovery issues with SMF and conduct correspondence with opposing counsel.	0.20	\$ 350.00	\$ 70.00
11/13/2013	Franklin	Draft form interrogatory; meet with CES re same.	0.10	\$ 375.00	\$ 37.50
11/13/2013	Franklin	Meet with SAB re strategy as to use of RFA in Gentry to [REDACTED].	0.20	\$ 375.00	\$ 75.00
11/13/2013	Franklin	Complete RFA, research re same re using RFAs effectively to lock DOJ into admissions.	4.40	\$ 375.00	\$ 1,650.00
11/14/2013	Brady	Receive and review and respond to email from opposing counsel re extending due date for their response to our complaint.	0.10	\$ 350.00	\$ 35.00
11/15/2013	Franklin	Email SAB re [REDACTED].	0.10	\$ 375.00	\$ 37.50

Date	Timekeeper	Description	Hours	Rate	Amount
11/15/2013	Franklin	Add RFAs to RFAs to be propounded in Gentry re the probation search.	1.10	\$ 375.00	\$ 412.50
11/16/2013	Franklin	Add addition RFA to RFA Set One.	1.20	\$ 375.00	\$ 450.00
11/19/2013	Franklin	Commence drafting POD, including significant review of POD in "parallel" federal case (Bauer).	2.20	\$ 375.00	\$ 825.00
11/20/2013	Franklin	Continue drafting POD.	0.20	\$ 375.00	\$ 75.00
11/26/2013	Brady	Telephone conference with SMF and opposing counsel re discovery, preparation for that conference, and discussion with SMF after re tasks to be performed.	0.50	\$ 350.00	\$ 175.00
11/26/2013	Franklin	Telecon with SAB and opposing counsel re progress of discovery dispute.	0.30	\$ 375.00	\$ 112.50
11/26/2013	Franklin	Prepare for telecon with opposing counsel, meeting with SAB re same.	0.30	\$ 375.00	\$ 112.50
11/26/2013	Franklin	Continue drafting POD.	2.90	\$ 375.00	\$ 1,087.50
11/26/2013	Nunez	Send/receive email to/from SAB and SMF re: possible extension to respond to complaint provided to defendants.	0.30	\$ 170.00	\$ 51.00
11/27/2013	Franklin	Research re [REDACTED] performed in conjunction with drafting PODs.	0.10	\$ 375.00	\$ 37.50
11/27/2013	Franklin	Continue drafting PODs.	3.00	\$ 375.00	\$ 1,125.00
11/28/2013	Franklin	Complete draft of POD; research scope of potential Gov't Code section 1040 applicability.	1.60	\$ 375.00	\$ 600.00
12/2/2013	Franklin	Per CDM, analyze GM v. San Francisco; emails to CDM re same; research re Tax Injunction Act.	2.20	\$ 375.00	\$ 825.00
12/10/2013	Brady	Meeting with SMF re possibility of [REDACTED]	0.40	\$ 350.00	\$ 140.00
12/10/2013	Franklin	Strategy meeting with SAB re possibility of [REDACTED]	0.40	\$ 375.00	\$ 150.00
1/2/2014	Franklin	Per CDM, analyze [REDACTED] for potential ideas re fee challenge.	0.60	\$ 375.00	\$ 225.00
1/2/2014	Michel	Meeting with SMF re [REDACTED] for potential ideas re fee challenge.	0.20	\$ 650.00	\$ 130.00
1/16/2014	Brady	Meeting with SMF re sources for relevant information via Public Records Act requests to use in litigation.	0.30	\$ 350.00	\$ 105.00
3/12/2014	Brady	Analyze audit of APPS in order to prepare discovery requests.	2.00	\$ 350.00	\$ 700.00
3/17/2014	Michel	Exchange emails with CA re [REDACTED] case.	0.10	\$ 650.00	\$ 65.00
3/17/2014	Michel	Review and analyze Petition re [REDACTED] case.	0.50	\$ 650.00	\$ 325.00
3/17/2014	Nunez	Emails from and to CDM and SAB re: [REDACTED] case.	0.20	\$ 170.00	\$ 34.00
3/17/2014	Nunez	Conduct research [REDACTED]	0.50	\$ 170.00	\$ 85.00
3/20/2014	Franklin	Review documents produced by state auditor in response to PRAR about state auditor's review of APPS.	2.10	\$ 375.00	\$ 787.50
3/28/2014	Brady	Exchange emails with SMF re discovery strategy re obtaining further documents from the State Auditor's office.	0.10	\$ 350.00	\$ 35.00
3/28/2014	Franklin	Email SAB re discovery strategy re obtaining further documents from the State Auditor's office.	0.10	\$ 375.00	\$ 37.50
4/9/2014	Brady	Meeting with CBS to discuss Gentry case and status of litigation at present.	0.50	\$ 350.00	\$ 175.00
4/10/2014	Brady	Analyze materials for drafting discovery.	1.50	\$ 350.00	\$ 525.00
4/11/2014	Brady	Review and analyze CBS memo re Dealer Record of Sale Fee, Penal Code section 28225, Proposition 13 and Proposition 26.	1.50	\$ 350.00	\$ 525.00
4/14/2014	Brady	Receipt, review and analyze trial transcript of Silvester case to determine whether any pertinent information for discovery use.	2.00	\$ 350.00	\$ 700.00
4/17/2014	Brady	Analyze complaint filed in Gentry and draft notes for possible discovery to seek in support of a substantive motion.	1.60	\$ 350.00	\$ 560.00
4/18/2014	Brady	Analyze Auditor's report re funding of APPS for use in drafting potential discovery to seek.	0.70	\$ 350.00	\$ 245.00
4/18/2014	Nunez	Send/receive email to/from SAB re [REDACTED]	0.30	\$ 170.00	\$ 51.00
4/18/2014	Nunez	Research re SAB's request to [REDACTED]	0.60	\$ 170.00	\$ 102.00
4/21/2014	Brady	Meeting with SMF re status of discovery.	0.50	\$ 350.00	\$ 175.00
4/21/2014	Franklin	Briefly review documents produced by state controller's office re armed persons with mental health issues report and documents used in creation thereof.	0.20	\$ 375.00	\$ 75.00
4/21/2014	Franklin	Meet with SAB to discuss strategy on discovery and potential crossover use in Bauer matter.	0.50	\$ 375.00	\$ 187.50
4/24/2014	Brady	Analyze trial transcript.	1.50	\$ 350.00	\$ 525.00
5/5/2014	Brady	Meeting with SMF re status of discovery.	0.60	\$ 350.00	\$ 210.00
5/5/2014	Brady	Conduct legal research and review re case law interpreting the tax versus fee issue in order to draft notes for use in briefing eventually and in assisting SMF to prepare discovery.	5.50	\$ 350.00	\$ 1,925.00
5/5/2014	Franklin	Meet with SAB re revising draft gentry discovery.	0.60	\$ 375.00	\$ 225.00
5/5/2014	Franklin	Meet briefly with SAB re drafting further discovery, review complaint and SAB's comments re same re drafting discovery, commence revising RFA set one.	3.00	\$ 375.00	\$ 1,125.00
5/6/2014	Brady	Meetings with CDM and SMF re status and strategy for case.	0.60	\$ 350.00	\$ 210.00
5/6/2014	Franklin	Meet with SAB re evaluating benefits of Casemap and substantive arguments to be developed; research re [REDACTED]	0.30	\$ 375.00	\$ 112.50
5/6/2014	Franklin	Meet with CDM and SAB re drafting discovery and general plan; follow up meeting with SAB re evaluating benefits of Casemap.	0.40	\$ 375.00	\$ 150.00
5/6/2014	Franklin	Continue revising and updating RFA set 1; meet with SAB re potential argument tha [REDACTED]	2.10	\$ 375.00	\$ 787.50
5/6/2014	Michel	Meetings with SAB and SMF re status and strategy for case.	0.60	\$ 650.00	\$ 390.00
5/7/2014	Brady	Continue to conduct legal research and review re case law interpreting the tax versus fee issue in order to draft notes for use in briefing eventually and in assisting SMF to prepare discovery.	4.30	\$ 350.00	\$ 1,505.00
5/7/2014	Franklin	Continue revising and updating RFA set 1.	6.00	\$ 375.00	\$ 2,250.00
5/7/2014	Nunez	Send/receive email to/from SMF re: request to contact Legislative Intent Service to see if they can pull Senator Leno's Legislative files on SB 819 as they were not available when we purchased the legislative history.	0.40	\$ 170.00	\$ 68.00

Date	Timekeeper	Description	Hours	Rate	Amount
5/8/2014	Brady	Continue to conduct legal research and review re case law interpreting the tax versus fee issue in order to draft notes for use in briefing eventually and in assisting SMF to prepare discovery.	3.40	\$ 350.00	\$ 1,190.00
5/9/2014	Brady	Meet with FMF re drafting PODs.	0.30	\$ 350.00	\$ 105.00
5/9/2014	Franklin	Meet with SAB re drafting PODs.	0.30	\$ 375.00	\$ 112.50
5/9/2014	Franklin	Commence revision and addition to POD set one; research re obtaining documents provided by DOJ in its capacity as a sponsor of AB 819.	3.50	\$ 375.00	\$ 1,312.50
5/12/2014	Brady	Review/Revise discovery requests (document production requests, special interrogatories, and requests for admissions) prepared by SMF to confirm they encompass all that we seek at this point and the accuracy of the understanding of the underlying systems involved.	4.30	\$ 350.00	\$ 1,505.00
5/12/2014	Franklin	Meet with SAB re drafting discovery.	0.10	\$ 375.00	\$ 37.50
5/12/2014	Franklin	Meet with SAB re finalizing discovery, finalize FI, draft Declaration of Necessity.	0.50	\$ 375.00	\$ 187.50
5/12/2014	Franklin	Draft SI; research re viability of [REDACTED] revise POD to add additional POD based on review of budget documents produced in Bauer matter.	1.90	\$ 375.00	\$ 712.50
5/13/2014	Brady	Analyze materials for drafting discovery.	1.80	\$ 350.00	\$ 630.00
5/13/2014	Franklin	Analyze SAB comments re discovery (SI, POD, RFA), make changes re same, meeting with SAB re same.	5.00	\$ 375.00	\$ 1,875.00
5/14/2014	Nunez	Receipt, review and analyze, revise, format, finalize, copy and mail out Special Interrogatories, Form Interrogatories, Request for Admissions, Request for Production of Documents and Declaration of Necessity.	3.00	\$ 170.00	\$ 510.00
5/21/2014	Nunez	Send/receive email to/from SMF and defendants attorney Anthony Hakl re: verifying proof of service for discovery previously sent out to defendants.	0.60	\$ 170.00	\$ 102.00
5/26/2014	Franklin	Analyze AB 161 and memo re same re impact on arguments as to whether SB 819 actually changed the law.	1.00	\$ 375.00	\$ 375.00
5/27/2014	Brady	Analyze potential legal arguments by DOJ with SMF in order to [REDACTED].	1.50	\$ 350.00	\$ 525.00
5/27/2014	Franklin	Meet with SAB re [REDACTED].	1.50	\$ 375.00	\$ 562.50
6/2/2014	Brady	Meet with SMF re drafting discovery to the Department of Finance.	0.20	\$ 350.00	\$ 70.00
6/2/2014	Brady	Receipt, review and analyze proposed discovery requests for State Controller defendant.	1.00	\$ 350.00	\$ 350.00
6/2/2014	Franklin	Meet with SAB re drafting discovery to the Department of Finance.	0.20	\$ 375.00	\$ 75.00
6/2/2014	Franklin	Draft PRAR re yearly and biennial fiscal records to Department of Justice.	0.60	\$ 375.00	\$ 225.00
6/2/2014	Franklin	Draft PRAR to Department of Finance; research "shift" of APPS costs from General Fund to DROS in 2012-2013 budget.	1.00	\$ 375.00	\$ 375.00
6/2/2014	Franklin	Revise POD to Defendant State Controller per comments of SAB.	1.40	\$ 375.00	\$ 525.00
6/3/2014	Brady	Analyze issues re arguments to assert with SMF.	0.20	\$ 350.00	\$ 70.00
6/3/2014	Franklin	Meet with SAB re [REDACTED] to our client's advantage.	0.20	\$ 375.00	\$ 75.00
6/4/2014	Brady	Review and make comments to SMF re Interrogatories to Controller.	0.80	\$ 350.00	\$ 280.00
6/4/2014	Franklin	Revise Interrogatories to Controller re comments of SAB.	0.40	\$ 375.00	\$ 150.00
6/6/2014	Franklin	Finalize POD and SI to defendant Chiang.	0.70	\$ 375.00	\$ 262.50
6/6/2014	Nunez	Receipt, review and analyze, copy, scan, save and mail Request for Production of Documents Set One and Special Interrogatories Set One propounded on State Controller John Chiang.	0.60	\$ 170.00	\$ 102.00
6/13/2014	Brady	Emails with SMF re proposed discovery extension.	0.10	\$ 350.00	\$ 35.00
6/13/2014	Franklin	Email CDM in response to his forwarding of older document re 2010 attempt to lower the DROS fee.	0.10	\$ 375.00	\$ 37.50
6/13/2014	Franklin	Email SAB re proposed discovery extension.	0.10	\$ 375.00	\$ 37.50
6/13/2014	Franklin	Email opposing counsel re discovery extension.	0.20	\$ 375.00	\$ 75.00
6/13/2014	Michel	Email SMF re 2010 attempt to lower the DROS fee.	0.10	\$ 650.00	\$ 65.00
6/15/2014	Brady	Email SMF re [REDACTED].	0.20	\$ 350.00	\$ 70.00
6/15/2014	Franklin	Analyze [REDACTED] Email SAB re same.	0.50	\$ 375.00	\$ 187.50
6/17/2014	Brady	Meet with SMF re potential [REDACTED].	0.20	\$ 350.00	\$ 70.00
6/17/2014	Franklin	Meet with SAB re potential [REDACTED].	0.20	\$ 375.00	\$ 75.00
6/17/2014	Franklin	Research statutes and legislative history to determine [REDACTED].	0.40	\$ 375.00	\$ 150.00
6/18/2014	Franklin	Commence drafting motion for summary judgement/adjudication.	0.90	\$ 375.00	\$ 337.50
6/19/2014	Franklin	Analyze documents produced by DOF re PRAR.	0.20	\$ 375.00	\$ 75.00
6/21/2014	Franklin	Evaluate documents produced by department of finance re change in DROS Fund (No. 460) page in the manual of state funds, determine how to best approach in discovery.	0.30	\$ 375.00	\$ 112.50
6/21/2014	Franklin	Continue drafting MSJ.	2.90	\$ 375.00	\$ 1,087.50
6/24/2014	Franklin	Continue drafting MSJ.	1.20	\$ 375.00	\$ 450.00
6/25/2014	Franklin	Continue drafting MSJ.	2.80	\$ 375.00	\$ 1,050.00
7/4/2014	Franklin	Continue drafting MSJ.	1.70	\$ 375.00	\$ 637.50
7/6/2014	Franklin	Continue drafting MSJ.	3.10	\$ 375.00	\$ 1,162.50
7/7/2014	Franklin	Analyze PRAR response re annual/biennial reports, email AMB re responding to same.	0.20	\$ 375.00	\$ 75.00
7/7/2014	Franklin	Continue drafting MSJ.	3.10	\$ 375.00	\$ 1,162.50
8/1/2014	Franklin	Commence analysis of discovery responses from Cal DOJ/State Controller's office.	1.30	\$ 375.00	\$ 487.50
8/4/2014	Brady	Receive and review and respond to correspondence from SMF re discovery.	0.40	\$ 350.00	\$ 140.00
8/4/2014	Franklin	Analyze first batch of documents produced in response to POD to DOJ.	1.20	\$ 375.00	\$ 450.00
8/4/2014	Franklin	Commence drafting meet-and-confer letter re Gentry discovery responses.	1.50	\$ 375.00	\$ 562.50
8/4/2014	Franklin	Continue review of discovery responses provided by DOJ.	3.00	\$ 375.00	\$ 1,125.00
8/8/2014	Brady	Discuss status of case and strategy with SMF.	0.40	\$ 350.00	\$ 140.00
8/8/2014	Franklin	Send/receive email to/from CA re request to profile incoming discovery responses.	0.10	\$ 375.00	\$ 37.50
8/8/2014	Franklin	Discuss status of case and strategy with SAB.	0.40	\$ 375.00	\$ 150.00
8/8/2014	Nunez	Receipt, review and analyze profile incoming discovery responses to request for production of documents, save, forward to gun team and relate with previous responses.	0.20	\$ 170.00	\$ 34.00
8/11/2014	Brady	Email SMF specifics re meeting with potential expert re accounting.	0.10	\$ 350.00	\$ 35.00

Date	Timekeeper	Description	Hours	Rate	Amount
8/11/2014	Brady	Conduct correspondence re and with potential experts to consult re DOJ's accounting practices to determine how it is tracking and using DROS funds.	0.60	\$ 350.00	\$ 210.00
8/11/2014	Franklin	Email SAB specifics re meeting with potential expert re accounting.	0.10	\$ 375.00	\$ 37.50
8/19/2014	Franklin	Analyze POD response documents.	0.40	\$ 375.00	\$ 150.00
8/25/2014	Brady	Send email to potential expert accountant.	0.20	\$ 350.00	\$ 70.00
8/29/2014	Franklin	Review additional documents produced by defendant.	0.20	\$ 375.00	\$ 75.00
9/1/2014	Franklin	Review documents for selection for review by potential accounting expert and to evaluate potential gaps in knowledge re accounting system, look for document productions that have not yet occurred or were insufficient (specific request nos.).	2.90	\$ 375.00	\$ 1,087.50
9/2/2014	Brady	Meeting with CDM and SMF re status of discovery.	0.20	\$ 350.00	\$ 70.00
9/2/2014	Franklin	Meeting with SAB and CDM re status of discovery.	0.20	\$ 375.00	\$ 75.00
9/2/2014	Michel	Meeting with SAB and SMF re status of discovery.	0.20	\$ 650.00	\$ 130.00
9/4/2014	Brady	Conduct correspondence re accounting expert with SMF.	0.20	\$ 350.00	\$ 70.00
9/4/2014	Franklin	Email SAB re [REDACTED]	0.20	\$ 375.00	\$ 75.00
9/7/2014	Franklin	Draft information for potential accounting expert re sample documents.	1.30	\$ 375.00	\$ 487.50
9/8/2014	Brady	Meeting with SMF re status of meet and confer letter for discovery disputes.	0.20	\$ 350.00	\$ 70.00
9/8/2014	Franklin	Meet with SAB re seeking extension on Motion to Compel deadline.	0.20	\$ 375.00	\$ 75.00
9/8/2014	Franklin	Email opposing counsel re seeking extension on Motion to Compel deadline.	0.30	\$ 375.00	\$ 112.50
9/10/2014	Quesada	Telephone conference with Sacramento Superior Court re procedure to request a hearing date on a motion to compel, per SMF.	0.20	\$ 170.00	\$ 34.00
9/16/2014	Quesada	Review/Revise responses to POD to see if response received is duplicative.	0.20	\$ 170.00	\$ 34.00
9/22/2014	Quesada	Conduct research re update on Gentry per MDC.	0.10	\$ 170.00	\$ 17.00
9/26/2014	Nunez	Receipt, review, analyze Gentry case profile, make notations, draft email to LQ re: changes that need to be made.	1.00	\$ 170.00	\$ 170.00
10/13/2014	Franklin	Research re [REDACTED]	0.50	\$ 375.00	\$ 187.50
10/13/2014	Franklin	Continue drafting meet and confer letter re discover responses provided August 1, 2014.	1.90	\$ 375.00	\$ 712.50
10/14/2014	Brady	Emails with SMF re retaining accounting expert and need for verification.	0.10	\$ 350.00	\$ 35.00
10/14/2014	Brady	Draft correspondence re potential expert witness.	0.30	\$ 350.00	\$ 105.00
10/14/2014	Franklin	Email SAB re retaining accounting expert and need for verification.	0.10	\$ 375.00	\$ 37.50
10/14/2014	Franklin	Continue research re [REDACTED]	0.60	\$ 375.00	\$ 225.00
10/14/2014	Franklin	Continue drafting meet and confer letter.	7.00	\$ 375.00	\$ 2,625.00
10/15/2014	Franklin	Continue drafting meet and confer letter.	5.50	\$ 375.00	\$ 2,062.50
10/17/2014	Franklin	Final proof read and corrections on meet-and-confer letter.	0.80	\$ 375.00	\$ 300.00
10/17/2014	Quesada	Send SMF email re deadline for meet and confer letter.	0.10	\$ 170.00	\$ 17.00
10/17/2014	Quesada	Review/Revise meet-and-confer letter re deadlines to calendar; calendar deadlines; assemble documents and mail to interested parties meet-and-confer letter; send email to A Haskl attaching PDF of meet-and-confer letter.	0.60	\$ 170.00	\$ 102.00
10/23/2014	Quesada	Send email to SMF re deadline to have telephonic meeting with OC re meet-and-confer letter.	0.10	\$ 170.00	\$ 17.00
10/29/2014	Franklin	Telephonic meet and confer with opposing counsel Anthonye Haki re insufficient discovery responses by defendants.	1.90	\$ 375.00	\$ 712.50
10/29/2014	Quesada	Telephone to Sacramento re filing Verification to Complaint (phone hours closed).	0.10	\$ 170.00	\$ 17.00
10/30/2014	Franklin	Analyze argument re claim that DOJ is going to bring motion for judgment on the pleadings, analyze documents produced by DOJ in response to PRAR.	1.50	\$ 375.00	\$ 562.50
10/30/2014	Quesada	Telephone conference with Clerk of Court re Verification needed for Complaint.	0.10	\$ 170.00	\$ 17.00
11/1/2014	Brady	Meeting with CDM re strategy and status of case.	0.50	\$ 350.00	\$ 175.00
11/1/2014	Michel	Meeting with SAB re strategy and status of case.	0.50	\$ 650.00	\$ 325.00
11/13/2014	Franklin	Draft POD set 2.	1.00	\$ 375.00	\$ 375.00
11/21/2014	Brady	Draft correspondence to C. Conte re [REDACTED]	0.30	\$ 350.00	\$ 105.00
11/24/2014	Franklin	Draft verifications, research limitations re same, email LQ re same.	0.50	\$ 375.00	\$ 187.50
11/24/2014	Quesada	Receipt, review and analyze Verifications per SMF; save each verification individually and ; email to CA asking for email addresses.	0.30	\$ 170.00	\$ 51.00
11/24/2014	Quesada	Send email to Plaintiffs attaching Verification for signature.	0.40	\$ 170.00	\$ 68.00
11/24/2014	Quesada	Receipt, review and analyze Audio and Video Clips re Attorney General Kamala Harris Announces Statewide Gun Sweep; download and save to imanage.	0.60	\$ 170.00	\$ 102.00
11/25/2014	Franklin	Telecon with Plaintiff James Bass re [REDACTED]	0.10	\$ 375.00	\$ 37.50
11/25/2014	Quesada	Send email to SMF re verifications emailed to plaintiffs.	0.10	\$ 170.00	\$ 17.00
12/4/2014	Quesada	Send emails to Paul Nordberg, Mark Midlam, James Parker and David Gentry re [REDACTED]	0.20	\$ 170.00	\$ 34.00
12/5/2014	Franklin	Analyze letter provided with supplemental discovery responses and research claim concerning viability of defendants proposed MJOP; meeting with SAB re same.	1.20	\$ 375.00	\$ 450.00
12/5/2014	Quesada	Receipt, review and analyze Verification from James Bass; save to imanage.	0.10	\$ 170.00	\$ 17.00
12/8/2014	Brady	Analyze issues re strategy for seeking discovery responses with SMF.	0.20	\$ 350.00	\$ 70.00
12/8/2014	Franklin	Review email from LLQ re status of Verifications to Petition.	0.10	\$ 375.00	\$ 37.50
12/8/2014	Franklin	Meet with SAB re strategy for seeking discovery responses.	0.20	\$ 375.00	\$ 75.00
12/8/2014	Franklin	Draft errata, email opposing counsel re same, research re same.	0.40	\$ 375.00	\$ 150.00
12/8/2014	Franklin	Line-by line analysis of DOJ's response to previous meet-and-confer letter and discovery telecon, research issues related to Defendants' proposed MJOP (e.g., whether there are questions of fact to be resolved).	2.70	\$ 375.00	\$ 1,012.50
12/8/2014	Michel	Review and analyze 12/04/14 DOJ Ltr. Responding to Pltf's Correspondence on 10/17/14 re: Discovery Requests & 09/15/14 Public Hearing Video.	0.20	\$ 650.00	\$ 130.00
12/8/2014	Quesada	Receive email from Dave Gentry re [REDACTED]	0.10	\$ 170.00	\$ 17.00
12/8/2014	Quesada	Telephone conference with Mark Midlam and Paul Nordberg re [REDACTED] telephone call to Paul Nordberg re [REDACTED] email to SMF re [REDACTED]	0.20	\$ 170.00	\$ 34.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/8/2014	Quesada	Review/Revise Errata Re: Failure to Attach Verification to Petition/Complaint re formatting; attach Gentry's verification; scan Errata with Verification and email same to SMF; continue edits to Errata per SMF; rescan and re-email same to SMF.	0.60	\$ 170.00	\$ 102.00
12/9/2014	Quesada	Receipt, review and analyze verificatio by Paul Nordberg sent via fax; update case profile to include Verifications and updated documents.	0.50	\$ 170.00	\$ 85.00
12/10/2014	Brady	Analyze DOJ's arguments for their proposed MJOP with SMF.	0.50	\$ 350.00	\$ 175.00
12/10/2014	Franklin	Draft letter to opposing counsel denying request to put disputed RFA responses on hold, brief meeting with SAB re same, additional .3 meeting with SAB re same	1.40	\$ 375.00	\$ 525.00
12/11/2014	Brady	Emails to SMF re strategy in [REDACTED]	0.10	\$ 350.00	\$ 35.00
12/11/2014	Brady	Analyze discovery issues with SMF.	0.70	\$ 350.00	\$ 245.00
12/11/2014	Franklin	Emails to SAB re strategy in [REDACTED]	0.10	\$ 375.00	\$ 37.50
12/11/2014	Franklin	Meet with SAB re [REDACTED] .1), finalize letter re same.	0.90	\$ 375.00	\$ 337.50
12/15/2014	Brady	Meeting with CDM re status of case and strategy.	0.50	\$ 350.00	\$ 175.00
12/15/2014	Franklin	Review video of DROS fee reduction hearing, review documents re potential PRAR re the cause of the 2010 fee reduction failure.	0.40	\$ 375.00	\$ 150.00
12/15/2014	Michel	Meeting with SAB re status of case and strategy.	0.50	\$ 650.00	\$ 325.00
12/15/2014	Quesada	Receipt, review and analyze December 4, 2014 letter to SMF in response to October 17, 2014 letter re discovery requests served by Plaintiff; update case profile to include letter.	0.10	\$ 170.00	\$ 17.00
12/16/2014	Franklin	Email opposing counsel re extending deadline for MTCs.	0.10	\$ 375.00	\$ 37.50
12/23/2014	Brady	Meeting with SMF re documents produced by Defendants and letter re status of discovery dispute.	0.20	\$ 350.00	\$ 70.00
12/23/2014	Franklin	Analyze documents produced by Defendants and letter re status of discovery dispute, email opposing counsel re same, brief meeting with SAB re same.	0.70	\$ 375.00	\$ 262.50
1/7/2015	Franklin	Continue to analyze privilege log and cases related thereto.	2.90	\$ 375.00	\$ 1,087.50
1/8/2015	Franklin	Email SAB summary of potentially relevant facts pulled from recently produced BCP.	0.30	\$ 375.00	\$ 112.50
1/8/2015	Franklin	Review standards for MSJ filing, evaluate work needed on MSJ brief already started.	0.50	\$ 375.00	\$ 187.50
1/9/2015	Franklin	Continue drafting MSJ/MSA.	1.70	\$ 375.00	\$ 637.50
1/9/2015	Quesada	Review file to see if 2nd set of POD were sent out per SMF.	0.30	\$ 170.00	\$ 51.00
1/11/2015	Franklin	Email CDM re privilege log deficiencies.	0.10	\$ 375.00	\$ 37.50
1/11/2015	Franklin	Research legal standards for challenging specific fee amount; continue reviewing further discovery needed re MSA.	1.20	\$ 375.00	\$ 450.00
1/11/2015	Michel	Exchange emails with SMF re privilege log deficiencies.	0.10	\$ 650.00	\$ 65.00
1/12/2015	Franklin	Draft arguments re failure of privilege log, review and compare rulemaking file to determine if more document productions are needed.	1.90	\$ 375.00	\$ 712.50
1/12/2015	Quesada	Receipt, review and analyze January 6, 2015 letter from Anthony Haki to SMF attaching privilege log.	0.10	\$ 170.00	\$ 17.00
1/13/2015	Franklin	Draft response re privilege log, research claims for MSJ/MSA, review updated 2004 rulemaking file.	1.50	\$ 375.00	\$ 562.50
1/19/2015	Franklin	Continue drafting response re privilege log, continue reviewing documents and comparing figures to try to determine exactly what methods were used in 2004 and 2010 to determine the level the DROS fee should be set at.	2.20	\$ 375.00	\$ 825.00
1/20/2015	Franklin	Continue evaluating and cross-referencing documents produced by DOJ, create chart re money flowing into, and out of, the DROS special account.	5.50	\$ 375.00	\$ 2,062.50
1/21/2015	Franklin	Analyze DOJ's MSJ in Bauer action to determine if any admissions relevant to the instant action can be identified.	1.10	\$ 375.00	\$ 412.50
1/22/2015	Franklin	Initial review of amended responses provided by DOJ re fist set of RFA and FI.	0.20	\$ 375.00	\$ 75.00
1/23/2015	Franklin	Continue review of amended responses provided by DOJ re fist set of RFA and FI, commence drafting of meet-and-confer letter re same.	6.60	\$ 375.00	\$ 2,475.00
1/26/2015	Quesada	Telephone conference with clerk for Judge Kenny to obtain hearing dates on Motion to Compel Discovery; email to SMF re same.	0.20	\$ 170.00	\$ 34.00
1/26/2015	Quesada	Conduct research re local rules and civil procedure rules to provide opposing counsel with court's available hearing dates re Motion to Compel Additional Discovery Responses.	0.90	\$ 170.00	\$ 153.00
1/27/2015	Franklin	Revise letter to opposing counsel re insufficient further discovery responses.	2.20	\$ 375.00	\$ 825.00
1/27/2015	Quesada	Telephone conference with clerk for Judge Kenny to reserve hearing date on motion to compel additional discovery responses.; calendar date and send invite to SMF; email to SMF re same.	0.20	\$ 170.00	\$ 34.00
1/28/2015	Franklin	Finalize response to supplemental RFA and FI responses.	1.20	\$ 375.00	\$ 450.00
1/29/2015	Brady	Meeting with SMF re discovery issues and development of arguments.	0.30	\$ 350.00	\$ 105.00
1/29/2015	Franklin	Meet with SAB re strategy and potential [REDACTED]	0.30	\$ 375.00	\$ 112.50
2/2/2015	Franklin	Email opposing counsel re setting a further discovery dispute telephonic meeting.	0.10	\$ 375.00	\$ 37.50
2/4/2015	Franklin	Send confirmation email re telephonic meet-and-confer with opposing counsel re further discovery responses.	0.20	\$ 375.00	\$ 75.00
2/4/2015	Franklin	Telephonic meet-and-confer with opposing counsel re further discovery responses.	1.00	\$ 375.00	\$ 375.00
2/6/2015	Quesada	Telephone conference with Clerk of Court re filing two separate motions to compel discovery responses; meet with SMF re same.	0.20	\$ 170.00	\$ 34.00
2/6/2015	Quesada	Receipt, review and analyze letter from A. Haki with Defendants Amended Response to RFA No. 33 and Notice of Hearing; profile both documents and calendar deadlines based on Notice of Hearing.	0.70	\$ 170.00	\$ 119.00
2/8/2015	Franklin	Commence drafting MTC re RFA responses.	0.50	\$ 375.00	\$ 187.50
2/9/2015	Brady	Meeting with SMF re strategy for motion to compel.	0.20	\$ 350.00	\$ 70.00
2/9/2015	Franklin	Meet with LLQ re drafting discovery motions.	0.10	\$ 375.00	\$ 37.50
2/9/2015	Franklin	Meeting with SAB re strategy for motion to compel.	0.20	\$ 375.00	\$ 75.00
2/9/2015	Franklin	Continue drafting MTC re RFA responses.	6.20	\$ 375.00	\$ 2,325.00
2/9/2015	Quesada	Send email to SMF with draft of separate statement in support of motion to compel additional discovery responses.	0.10	\$ 170.00	\$ 17.00
2/9/2015	Quesada	Draft Separate Statement in support of Motion to Compel additional responses to requests for admission.	0.20	\$ 170.00	\$ 34.00

Date	Timekeeper	Description	Hours	Rate	Amount
2/9/2015	Quesada	Conduct research re Sacramento local rules re necessary documents when filing a motion to compel discovery responses.	0.60	\$ 170.00	\$ 102.00
2/9/2015	Quesada	Draft Separate Statement in Support of Motion to Compel Additional Responses to Form Interrogatories.	1.20	\$ 170.00	\$ 204.00
2/10/2015	Brady	Receipt, review and analyze 02/06/15 DOJ Ltr. re: Def's Responses to RFA.	0.20	\$ 350.00	\$ 70.00
2/10/2015	Franklin	Complete draft of MTC re RFA responses.	3.90	\$ 375.00	\$ 1,462.50
2/11/2015	Franklin	Revise motion to compel RFA responses; commence drafting MTC FI responses.	3.00	\$ 375.00	\$ 1,125.00
2/11/2015	Quesada	Review/Revise Motion to Compel Further Responses to Request for Admission Propounded on Defendants Harris and Lindley; and Separate Statement in Support of Motion to Compel Further Responses to Request for Admission Propounded on Defendants Harris and Lindley per SMF.	1.60	\$ 170.00	\$ 272.00
2/12/2015	Franklin	Complete drafting MTC re FI responses.	4.70	\$ 375.00	\$ 1,762.50
2/12/2015	Quesada	Draft Separate Statement in Support of Plaintiffs' Motion to Compel Additional Responses to Form Interrogatories, Set One Propounded on Defendants Harris and Lindley; email draft to SMF.	3.90	\$ 170.00	\$ 663.00
2/13/2015	Franklin	Revise MTC re FI, RFA responses.	2.40	\$ 375.00	\$ 900.00
2/15/2015	Franklin	Draft PRAR re APPS report.	0.30	\$ 375.00	\$ 112.50
2/15/2015	Franklin	Complete declaration re MTCs.	0.30	\$ 375.00	\$ 112.50
2/15/2015	Franklin	Revise MTC re RFA responses; revise separate statements.	5.60	\$ 375.00	\$ 2,100.00
2/16/2015	Brady	Review/Revise motion to compel discovery responses.	0.90	\$ 350.00	\$ 315.00
2/16/2015	Brady	Analyze structure of and arguments to include in motion to compel discovery responses with SMF.	1.00	\$ 350.00	\$ 350.00
2/16/2015	Franklin	Meet with SAB re revising MTC re RFA re MJOP argument.	1.00	\$ 375.00	\$ 375.00
2/16/2015	Franklin	Further revisions to motion to compel further RFA responses.	1.90	\$ 375.00	\$ 712.50
2/16/2015	Quesada	Send email to Kimberly Granger re PRAR 02.17.15 - Penal Code Section 30015(b) Report; cc SMF; calendar deadline for response to PRAR; invite SMF to outlook calendar event.	0.20	\$ 170.00	\$ 34.00
2/17/2015	Brady	Review/Revise motion to compel further discovery responses.	0.40	\$ 350.00	\$ 140.00
2/17/2015	Franklin	Revise motion to compel FI responses.	3.20	\$ 375.00	\$ 1,200.00
2/18/2015	Quesada	Receipt, review and analyze email from nationwide legal providing conformed cover page of documents filed; check request re fees advanced; scan documents and save all on imanager; profile documents on internal case docket; call to clerk of court asking for more additional dates because Hakl may have a conflict with 4/24/15 hearing date; meet with SMF re same.	1.60	\$ 170.00	\$ 272.00
2/19/2015	Franklin	Meet with LLQ re email concerning proposed stipulation to streamline discovery on privilege log dispute; draft same.	1.00	\$ 375.00	\$ 375.00
2/19/2015	Quesada	Telephone conference with Judge Kenny's Clerk re submission of position statement and documents for in camera review; meeting with SMF re same.	0.20	\$ 170.00	\$ 34.00
2/20/2015	Franklin	Analyze strategy for motion to compel with SAB.	0.20	\$ 375.00	\$ 75.00
2/20/2015	Franklin	Complete stipulation re expedited POD resolution mechanism, email opposing counsel re same.	0.90	\$ 375.00	\$ 337.50
2/23/2015	Franklin	Telecon with opposing counsel re scheduling MTC and MJOP hearings.	0.50	\$ 375.00	\$ 187.50
2/24/2015	Brady	Analyze strategy for motion to compel discovery responses with SMF.	0.20	\$ 350.00	\$ 70.00
2/24/2015	Franklin	Meet with SAB re determining strategy regarding [REDACTED]	0.20	\$ 375.00	\$ 75.00
2/24/2015	Franklin	Commence drafting brief in support of relief re withheld documents.	0.80	\$ 375.00	\$ 300.00
2/26/2015	Franklin	Email opposing counsel re scheduling briefing on motions to compel and MJOP.	0.10	\$ 375.00	\$ 37.50
2/27/2015	Franklin	Analyze recent proposition 26 case for potential [REDACTED]	0.40	\$ 375.00	\$ 150.00
2/27/2015	Franklin	Continue drafting brief re POD, including research re [REDACTED]	4.40	\$ 375.00	\$ 1,650.00
3/2/2015	Franklin	Continue drafting POD brief, research whether [REDACTED]	2.10	\$ 375.00	\$ 787.50
3/3/2015	Brady	Exchange emails with SMF re ruling from Bauer case to determine [REDACTED]	0.10	\$ 350.00	\$ 35.00
3/3/2015	Franklin	Analyze ruling from Bauer case to determine [REDACTED] email SAB re same.	0.50	\$ 375.00	\$ 187.50
3/3/2015	Franklin	Email opposing counsel re follow up issues needed to be address on various discovery disputes.	0.50	\$ 375.00	\$ 187.50
3/4/2015	Franklin	Telecon with Anthony Hakl and follow email re same (discovery issues); meet briefly with LLQ re same.	0.40	\$ 375.00	\$ 150.00
3/5/2015	Franklin	Follow-up email to DOJ re PRAR of February 16 (17), 2015.	0.10	\$ 375.00	\$ 37.50
3/5/2015	Franklin	Draft stipulation re briefing in Gentry.	0.70	\$ 375.00	\$ 262.50
3/5/2015	Quesada	Telephone conference with clerk of court (Sue) re moving April 24, 2015 hearing date to an earlier date; meet with SMF re same.	0.20	\$ 170.00	\$ 34.00
3/6/2015	Franklin	Finalize draft stipulation and email opposing counsel re same.	0.20	\$ 375.00	\$ 75.00
3/9/2015	Franklin	Analyze SB 140 report produced via a PRAR.	0.20	\$ 375.00	\$ 75.00
3/10/2015	Brady	Review and analyze Def's Answer to Complaint for Dec. & Inj. relief & Petition for Writ of Mandamus.	0.60	\$ 350.00	\$ 210.00
3/10/2015	Franklin	Revise stipulation re scheduling of MTC and MJOP dates, email opposing counsel accordingly.	0.10	\$ 375.00	\$ 37.50
3/10/2015	Franklin	Email Tony Hakl re extending MTC deadline re POD.	0.10	\$ 375.00	\$ 37.50
3/10/2015	Franklin	Analyze answer, meet with LLQ re serving second round of form interrogatories.	0.20	\$ 375.00	\$ 75.00
3/10/2015	Michel	Review and analyze Def's Answer to Complaint for Dec. & Inj. relief & Petition for Writ of Mandamus.	0.50	\$ 650.00	\$ 325.00
3/18/2015	Brady	Receipt, review and analyze response to Public Records Act request for use in developing discovery.	0.40	\$ 350.00	\$ 140.00
3/19/2015	Brady	Meeting with SMF re follow up discovery.	0.60	\$ 350.00	\$ 210.00
3/19/2015	Franklin	Email opposing counsel re drafting of expedited process for POD dispute resolution	0.10	\$ 375.00	\$ 37.50
3/19/2015	Franklin	Research re anticipated opposition to MJOP; including [REDACTED] revise MSJ.	3.40	\$ 375.00	\$ 1,275.00
3/19/2015	Franklin	Draft follow up discovery, meet with SAB re same.	4.20	\$ 375.00	\$ 1,575.00
3/20/2015	Brady	Analyze issues re discovery with SMF.	0.20	\$ 350.00	\$ 70.00
3/20/2015	Franklin	Review case law re demurrer /MJOP, attempt to identify fact issues that will preclude an MJOP, meet with ML re same.	1.40	\$ 375.00	\$ 525.00
3/20/2015	Franklin	Revise RFA (set two) and other discovery; meet with SAB re evaluation of case and potential discovery topics to address.	1.60	\$ 375.00	\$ 600.00
3/20/2015	Franklin	Continue revising MSJ/MSA; meet with ML re same.	1.70	\$ 375.00	\$ 637.50

Date	Timekeeper	Description	Hours	Rate	Amount
3/20/2015	Quesada	Draft Form Interrogatories, set three.	0.20	\$ 170.00	\$ 34.00
3/20/2015	Quesada	Review/Revise discovery requests to defendant; assemble print and mail discovery requests to defendant; save discovery requests into imanage; calendar deadline for responses.	1.50	\$ 170.00	\$ 255.00
3/21/2015	Franklin	Continue drafting MSJ; research re MJOP Opposition/MTC Reply.	3.50	\$ 375.00	\$ 1,312.50
3/23/2015	Franklin	Commence drafting reply ISO MTCs; research history re [REDACTED]	4.10	\$ 375.00	\$ 1,537.50
3/24/2015	Franklin	Perform further research to see if [REDACTED] e.	1.20	\$ 375.00	\$ 450.00
3/24/2015	Franklin	Draft PRAR re finding legal basis for [REDACTED] review law re same; analyze DOF PRAR response re same; continue drafting MSJ.	3.20	\$ 375.00	\$ 1,200.00
3/25/2015	Franklin	Email to opposing counsel re setting meeting re POD stipulation, email LLQ re changing deadline for MTC re POD responses.	0.10	\$ 375.00	\$ 37.50
3/26/2015	Franklin	Revise stip re POD dispute resolution procedure; research re protecting documents submitted for in camera review, meet with outside attorney for option on same.	1.50	\$ 375.00	\$ 562.50
3/27/2015	Brady	Analyze issue re information to pursue re AG's knowledge of Proposition 26's application to DROS with SMF.	0.10	\$ 350.00	\$ 35.00
3/27/2015	Quesada	Receipt, review and analyze response to PRAR #03.24.15 (Legislative Process); forward email to SMF.	0.10	\$ 170.00	\$ 17.00
4/1/2015	Quesada	Telephone call with Legislative Intent Service re de-restricted files for SB819(2011) and Legislative Counsel's Opinion of August 28, 2002; email to SMF re same.	0.20	\$ 170.00	\$ 34.00
4/2/2015	Franklin	Continue drafting expedited POD dispute resolution Stipulation.	0.80	\$ 375.00	\$ 300.00
4/2/2015	Quesada	Meeting with SMF re lodging of confidential documents for in camera review.	0.10	\$ 170.00	\$ 17.00
4/2/2015	Quesada	Telephone conference with clerk of court re court's preference for lodging of confidential documents.	0.20	\$ 170.00	\$ 34.00
4/3/2015	Franklin	Email signed extension stipulation to opposing counsel.	0.10	\$ 375.00	\$ 37.50
4/3/2015	Franklin	Research when Senator Leno is termed out and email LLQ re need for reminder that his AB 819 file should become available on December 1, 2016.	0.30	\$ 375.00	\$ 112.50
4/3/2015	Franklin	Draft PRAR re Leg. counsel opinion cited in AB 161 debates; add to POD.	0.70	\$ 375.00	\$ 262.50
4/3/2015	Franklin	Analyze documents from 2002 T-M investigation into use of DROS funds for law enforcement issues.	1.50	\$ 375.00	\$ 562.50
4/6/2015	Brady	Analyze issues re reply brief for motion to compel with SMF.	0.20	\$ 350.00	\$ 70.00
4/6/2015	Franklin	Analyze opposition to MTCs; -2 meeting with SAB re same.	1.20	\$ 375.00	\$ 450.00
4/7/2015	Franklin	Commence drafting reply to MTCs.	7.10	\$ 375.00	\$ 2,662.50
4/8/2015	Franklin	Continue drafting reply ISO MTCs.	3.40	\$ 375.00	\$ 1,275.00
4/9/2015	Franklin	Review email from opposing counsel re request for extension, email LLQ re same; draft email to opposing counsel re same.	0.30	\$ 375.00	\$ 112.50
4/9/2015	Franklin	Try to find other case law [REDACTED]	1.10	\$ 375.00	\$ 412.50
4/9/2015	Franklin	Complete reply ISO MTCs.	3.80	\$ 375.00	\$ 1,425.00
4/10/2015	Brady	Analyze issues re reply brief to motion to compel with SMF.	0.50	\$ 350.00	\$ 175.00
4/10/2015	Brady	Review/Revise reply to opposition to motion to compel discovery.	2.90	\$ 350.00	\$ 1,015.00
4/10/2015	Franklin	Email opposing counsel re in camera stipulation, revise stipulation re same.	0.20	\$ 375.00	\$ 75.00
4/10/2015	Franklin	Meet with SAB re revising Reply.	0.50	\$ 375.00	\$ 187.50
4/10/2015	Franklin	Revise reply re SAB's comments.	1.50	\$ 375.00	\$ 562.50
4/10/2015	Franklin	Revise Reply ISO MTCs.	2.50	\$ 375.00	\$ 937.50
4/13/2015	Franklin	Draft declaration ISO reply.	0.30	\$ 375.00	\$ 112.50
4/14/2015	Franklin	Final review of Reply and Declaration ISO.	1.10	\$ 375.00	\$ 412.50
4/14/2015	Quesada	Review/Revise Reply in Support of Motion to Compel Responses to Requests for Admission and Declaration in Support; telephone call to Nationwide Legal to confirm ability to file with Sacramento Superior Court; emailing of PDFs to Nationwide Legal for filing; email to Anthony Hakl with documents; mailing of documents to Anthony Hakl; update internal case docket with documents.	1.00	\$ 170.00	\$ 170.00
4/16/2015	Franklin	Email opposing counsel re need for information correlating privilege log items and specific RFPs.	0.10	\$ 375.00	\$ 37.50
4/16/2015	Franklin	Email opposing counsel an updated draft stip. re in camera review, meet with LLQ re same.	0.30	\$ 375.00	\$ 112.50
4/16/2015	Franklin	Review draft discovery motion re in camera review of withheld documents.	1.00	\$ 375.00	\$ 375.00
4/16/2015	Quesada	Preparation of Stipulation Re Expedited Resolution Re Disputed Request for Production Responses and Proposed Order for filing with Sacramento Superior Court on Friday, April 17, 2015.	0.50	\$ 170.00	\$ 85.00
4/20/2015	Brady	Analyze similar case filed to determine arguments.	0.30	\$ 350.00	\$ 105.00
4/30/2015	Franklin	Analyze MJOP denial from different case to determine if useful for disputing current MJOP.	0.10	\$ 375.00	\$ 37.50
5/3/2015	Franklin	Complete drafting POD brief.	3.70	\$ 375.00	\$ 1,387.50
5/4/2015	Franklin	Telcon with opposing counsel re court's failure to formally approve expedited POD process.	0.10	\$ 375.00	\$ 37.50
5/4/2015	Franklin	Draft stipulation to extend POD reply brief.	0.20	\$ 375.00	\$ 75.00
5/4/2015	Franklin	Meet with MEL re revising brief re POD.	0.20	\$ 375.00	\$ 75.00
5/4/2015	Franklin	Email opposing counsel re request for extension on pending discovery.	0.50	\$ 375.00	\$ 187.50
5/4/2015	Franklin	Finalize POD brief.	0.70	\$ 375.00	\$ 262.50
5/4/2015	Franklin	Analyze DOJ's POD brief, email MEL re same.	1.00	\$ 375.00	\$ 375.00
5/4/2015	Quesada	Send email to opposing counsel with attachments.	0.10	\$ 170.00	\$ 17.00
5/5/2015	Brady	Meeting with CDM re strategy for opposing MJOP.	0.20	\$ 350.00	\$ 70.00
5/5/2015	Brady	Meeting with AMB and CDM re status of litigation and [REDACTED] s.	0.40	\$ 350.00	\$ 140.00
5/5/2015	Brady	Review and revise brief re motion to compel PODs.	1.50	\$ 350.00	\$ 525.00
5/5/2015	Franklin	Research arguments for use in reply re POD.	0.30	\$ 375.00	\$ 112.50
5/5/2015	Franklin	Meet with MEG re drafting Reply re POD brief.	0.50	\$ 375.00	\$ 187.50
5/5/2015	Michel	Meeting with AMB and SAB re status of litigation and preparing opposition to Motion for Judgment on the Pleadings.	0.20	\$ 650.00	\$ 130.00

Date	Timekeeper	Description	Hours	Rate	Amount
5/5/2015	Michel	Meeting with AMB and SAB re status of litigation and [REDACTED]	0.40	\$ 650.00	\$ 260.00
5/5/2015	Quesada	Telephone conference with Nationwide Legal re filing fee paid to Sacramento Court; meet with SMF re revisions needed to documents filed with Court; review and revise Brief in Support of Request for Order to Disclose Documents and Proposed Order; review and revise Stipulation Extending Plaintiffs' Time to File Opposition to Motion for Judgment on the Pleadings and Proposed Order per SMF.	0.80	\$ 170.00	\$ 136.00
5/6/2015	Franklin	Meet with SAB (.1) re his analysis of MJOP, research re [REDACTED] that may change briefing strategy.	0.50	\$ 375.00	\$ 187.50
5/6/2015	Quesada	Review/Revise Reply to Defendants' Brief Re: In Camera Discovery Proceedings re formatting issues with page number, footer, foot notes, etc.	1.50	\$ 170.00	\$ 255.00
5/7/2015	Franklin	Email opposing counsel re his request for extension on discovery.	0.10	\$ 375.00	\$ 37.50
5/7/2015	Quesada	Send email to SMF re filing of Stipulation for Extension of Time to File Opposition to Defendants' Motion for Judgment on the Pleadings.	0.10	\$ 170.00	\$ 17.00
5/8/2015	Brady	Analyze arguments in opposition to MJOP with SMF.	0.80	\$ 350.00	\$ 280.00
5/8/2015	Brady	Analyze MJOP and notes re such in preparation for drafting opposition thereto.	1.10	\$ 350.00	\$ 385.00
5/8/2015	Franklin	Meet with AMB and MEL to discuss drafting OPP to MJOP.	0.20	\$ 375.00	\$ 75.00
5/8/2015	Franklin	Meet with SAB to discuss drafting OPP to MJOP X 2.	0.80	\$ 375.00	\$ 300.00
5/11/2015	Franklin	Revise reply re POD dispute.	1.20	\$ 375.00	\$ 450.00
5/11/2015	Franklin	Commence drafting Opposition to MJOP.	4.00	\$ 375.00	\$ 1,500.00
5/11/2015	Quesada	Review and revise Reply to Defendants' Brief Re In Camera Discovery Proceedings with SMF revisions.	0.10	\$ 170.00	\$ 17.00
5/11/2015	Quesada	Send email to A. Haki of Plaintiffs' Reply to Defendants' Brief Regarding In Camera Discovery Proceeding.	0.10	\$ 170.00	\$ 17.00
5/11/2015	Quesada	Send email to nationwide legal re filing of Plaintiffs' Reply to Defendants' Brief Regarding In Camera Discovery Proceeding for filing with Sacramento Superior Court.	0.20	\$ 170.00	\$ 34.00
5/12/2015	Franklin	Continue drafting Opposition to MJOP; including review of recent proposition 218 case, Capistrano Taxpayers Association.	5.90	\$ 375.00	\$ 2,212.50
5/12/2015	Quesada	Receipt, review and analyze Orders (1) Extending Time for Plaintiffs to file Opposition to Defendants' Motion for Judgment on the Pleadings and (2) Setting Scheduling for Expedited Resolution re Disputed Responses to Plaintiffs' Request for Production of Documents; update back page and send updated back page link to CDM, SMF, SAB, HV, CN and JAC.	0.30	\$ 170.00	\$ 51.00
5/13/2015	Brady	Meeting with AMB re Plaintiffs' Opposition to Defendants' Motion for Judgment on the Pleadings; discuss [REDACTED]	0.30	\$ 350.00	\$ 105.00
5/13/2015	Franklin	Draft Dec. ISO Opposition to MJOP per AMB's comments.	2.10	\$ 375.00	\$ 787.50
5/13/2015	Franklin	Revise first draft of Opposition to MJOP per AMB's comments.	2.30	\$ 375.00	\$ 862.50
5/13/2015	Franklin	Complete first draft of Opposition to MJOP	2.90	\$ 375.00	\$ 1,087.50
5/15/2015	Franklin	Review cases to see if any discuss the concept of "higher tax" or revenue neutral specifically re MJOP opp.	0.50	\$ 375.00	\$ 187.50
5/15/2015	Franklin	Analyze RFA and SI responses.	0.90	\$ 375.00	\$ 337.50
5/15/2015	Franklin	Revise MJOP Opp. per SAB's comments.	1.00	\$ 375.00	\$ 375.00
5/15/2015	Quesada	Preparation of hearing binder re Plaintiffs' motions to compel additional discovery responses and Defendants' Motion for Judgment on the Pleadings.	1.70	\$ 170.00	\$ 289.00
5/18/2015	Franklin	Draft meet and confer letter re discovery responses produced May. 15, 2015.	1.50	\$ 375.00	\$ 562.50
5/18/2015	Franklin	Final review of MJOP opp. docs, including .3 conversation with AMB re potential inclusion [REDACTED]	3.40	\$ 375.00	\$ 1,275.00
5/18/2015	Quesada	Review and revise Harris & Lindley responses to Requests for Admissions (Set Two) and Special Interrogatories (Set Two). Profile and save into imanager and on internal case docket.	0.30	\$ 170.00	\$ 51.00
5/19/2015	Franklin	Telecon with OAL research attorney re trying to find information regarding DOJ's abandonment of 2010 rulemaking to reduce DROS Fee.	0.20	\$ 375.00	\$ 75.00
5/19/2015	Franklin	Complete meet and confer letter re discovery responses produced May. 15, 2015.	1.90	\$ 375.00	\$ 712.50
5/19/2015	Quesada	Send email to A. Haki attaching Opposition to Motion for Judgment on the Pleadings; Declaration in Support and Proposed Order.	0.10	\$ 170.00	\$ 17.00
5/20/2015	Franklin	Email to CDM re potential [REDACTED]; research re same.	1.30	\$ 375.00	\$ 487.50
5/20/2015	Franklin	Prepare outline for hearing re Discovery motions and MJOP.	2.40	\$ 375.00	\$ 900.00
5/20/2015	Michel	Exchange emails with SMF re [REDACTED]	0.30	\$ 650.00	\$ 195.00
5/21/2015	Brady	Meet with SMF re deciding whether to split MSJ from writ brief.	0.40	\$ 350.00	\$ 140.00
5/21/2015	Brady	Analyze issues re strategy for fling merits briefs versus trial and bifurcation of declaratory claims and writ.	0.60	\$ 350.00	\$ 210.00
5/21/2015	Franklin	Meet with SAB re deciding whether [REDACTED]	0.40	\$ 375.00	\$ 150.00
5/21/2015	Quesada	Conduct research re Defendants' Proposed Order on Motion for Judgment on the Pleadings; email to SMF re same.	0.20	\$ 170.00	\$ 34.00
5/21/2015	Quesada	Transcribe tape. Revise re 4/30/15 Senate Budget Subcommittee #5.	2.70	\$ 170.00	\$ 459.00
5/22/2015	Quesada	Transcribe tape April 30, 2015 subcommittee 5 hearing.	2.80	\$ 170.00	\$ 476.00
5/26/2015	Brady	Analyze underlying law with SMF in developing arguments for merits brief.	0.10	\$ 350.00	\$ 35.00
5/26/2015	Franklin	Analyze responses to RFA sets 2 and 3, POD responses, and commence drafting meet and confer letter re same.	0.70	\$ 375.00	\$ 262.50
5/26/2015	Franklin	Draft RFA re key issues in case; analyze [REDACTED]	1.20	\$ 375.00	\$ 450.00
5/27/2015	Franklin	Status meeting with CDM.	0.30	\$ 375.00	\$ 112.50
5/27/2015	Franklin	Draft meet and confer letter re POD responses and FI Sets 2 and 3.	1.70	\$ 375.00	\$ 637.50
5/27/2015	Michel	Status meeting with SMF.	0.30	\$ 650.00	\$ 195.00
5/28/2015	Franklin	Final review of 5/28 meet-and-confer letter.	0.20	\$ 375.00	\$ 75.00
5/29/2015	Brady	Analyze how to address argument in reply brief to MJOP with SMF.	0.20	\$ 350.00	\$ 70.00
5/29/2015	Franklin	Review Reply, commence drafting ideas for oral argument; meeting with SAB re same.	0.70	\$ 375.00	\$ 262.50

Date	Timekeeper	Description	Hours	Rate	Amount
6/1/2015	Franklin	Draft request for judicial notice.	2.10	\$ 375.00	\$ 787.50
6/1/2015	Franklin	Draft notes for oral argument re reply.	2.30	\$ 375.00	\$ 862.50
6/1/2015	Quesada	Send email to LPB re Stipulation and Joint Application filed on April 17, 2015.	0.10	\$ 170.00	\$ 17.00
6/2/2015	Brady	Meet with SMF re revising oral argument strategy for MJOP.	0.50	\$ 350.00	\$ 175.00
6/2/2015	Brady	Analyze reply brief to MJOP, draft attorney notes re counter arguments.	1.00	\$ 350.00	\$ 350.00
6/2/2015	Franklin	Revise notes for oral argument re reply.	0.40	\$ 375.00	\$ 150.00
6/2/2015	Franklin	Meet with SAB re revising oral argument strategy for MJOP.	0.50	\$ 375.00	\$ 187.50
6/2/2015	Franklin	Continue drafting request for judicial notice, .1 meeting with MEL re same.	0.80	\$ 375.00	\$ 300.00
6/2/2015	Quesada	Review and revise index to binder re Motion to Compel Additional Discovery Responses, and Motion for Judgment on the Pleadings.	0.20	\$ 170.00	\$ 34.00
6/2/2015	Quesada	Review and revise Request for Judicial Notice per MEL revisions; copy, assemble, file and serve Request for Judicial Notice in Support of Opposition to Defendants' Motion for Judgment on the Pleadings.	0.70	\$ 170.00	\$ 119.00
6/3/2015	Brady	Meeting with SAB re order on RFP expedited motion.	0.50	\$ 350.00	\$ 175.00
6/3/2015	Brady	Receipt, review and analyze order granting motion to compel and provide feedback to SMF re meaning for substantive briefs.	0.60	\$ 350.00	\$ 210.00
6/3/2015	Franklin	Email opposing counsel re production of redacted documents re RFP expedited process (including drafting of email text not used).	0.30	\$ 375.00	\$ 112.50
6/3/2015	Franklin	Review order on RFP expedited motion, research re [REDACTED] .5 meeting with SAB re same.	1.00	\$ 375.00	\$ 375.00
6/4/2015	Brady	Analyze order re hearing on MJOP with SMF in order to prepare arguments therefor.	0.10	\$ 350.00	\$ 35.00
6/4/2015	Franklin	Analyze pending discovery motions to see if [REDACTED]	0.80	\$ 375.00	\$ 300.00
6/4/2015	Franklin	Research issues the court identified in tentative ruling; .1 meeting with SAB re same	1.90	\$ 375.00	\$ 712.50
6/5/2015	Brady	Analyze potential strategy for proceeding in light of MJOP being granted with SMF.	0.30	\$ 350.00	\$ 105.00
6/5/2015	Brady	Meeting with CDM re developing strategy for moving forward in light of MJOP being granted.	0.50	\$ 350.00	\$ 175.00
6/5/2015	Franklin	Telecon with SAB (and brief telecon with MEL) re plan for responding to MJOP being granted.	0.30	\$ 375.00	\$ 112.50
6/5/2015	Franklin	Appear at MJOP hearing.	1.00	\$ 375.00	\$ 375.00
6/5/2015	Michel	Meeting with SAB re developing strategy for moving forward in light of MJOP being granted.	0.50	\$ 650.00	\$ 325.00
6/8/2015	Brady	Meeting with SMF re strategy for [REDACTED]	0.20	\$ 350.00	\$ 70.00
6/8/2015	Brady	Exchange emails with SMF re documents produced in response to ruling on POD dispute.	0.70	\$ 350.00	\$ 245.00
6/8/2015	Franklin	Meet with SAB planning for response to MJOP being granted.	0.20	\$ 375.00	\$ 75.00
6/8/2015	Franklin	Review documents produced in response to ruling on POD dispute, email SAB re same.	0.70	\$ 375.00	\$ 262.50
6/8/2015	Franklin	Review research prepared by MEL re [REDACTED] draft proposed order.	2.50	\$ 375.00	\$ 937.50
6/8/2015	Michel	Exchange emails with SMF re [REDACTED]	0.20	\$ 650.00	\$ 130.00
6/8/2015	Quesada	Receipt, review and analyze Hakl letter dated 06-04-15 enclosing documents listed on privilege log per Court's 6/1/15 Court Order; update internal case profile.	0.10	\$ 170.00	\$ 17.00
6/9/2015	Brady	Analyze issues with proceeding in light of MJOP being granted with SMF.	0.40	\$ 350.00	\$ 140.00
6/9/2015	Franklin	Meet with SAB re preparing strategy for dealing with MJOP ruling.	0.40	\$ 375.00	\$ 150.00
6/9/2015	Franklin	Analyze [REDACTED]	0.50	\$ 375.00	\$ 187.50
6/9/2015	Franklin	Continue drafting proposed order, research re options to keep as much of litigation open as possible.	3.20	\$ 375.00	\$ 1,200.00
6/10/2015	Brady	Meeting with SMF to discuss strategy for responding to MJOP grant.	0.50	\$ 350.00	\$ 175.00
6/10/2015	Franklin	Meet with SAB re evaluating arguments for and against [REDACTED]	0.50	\$ 375.00	\$ 187.50
6/10/2015	Franklin	Research if MJOP appeal/writ might be precluded by [REDACTED]	2.60	\$ 375.00	\$ 975.00
6/10/2015	Franklin	Research viability of seeking leave to amend re Declaratory relief claim as to whether [REDACTED]	4.30	\$ 375.00	\$ 1,612.50
6/10/2015	Quesada	Receipt, review and analyze additional documents produced by defendant per Court's Order; attach documents to already produced documents and forward complete set to SMF; online research for court's tentative ruling; save tentative ruling in imanage and on internal case docket; update back page and send updated back page link with tentative ruling to CDM, CBM, SMF, SAB, AMB, HV, CN, MEL, MDC and JAC.	1.00	\$ 170.00	\$ 170.00
6/11/2015	Brady	Review and revise SMF's draft proposed order granting MJOP per the court's order.	1.80	\$ 350.00	\$ 630.00
6/12/2015	Brady	Review and revise letter to opposing counsel drafted by SMF rejecting their proposed order and justifying ours.	0.30	\$ 350.00	\$ 105.00
6/12/2015	Brady	Analyze strategy moving forward with SMF.	0.40	\$ 350.00	\$ 140.00
6/12/2015	Brady	Meeting with JAS re [REDACTED]	0.50	\$ 350.00	\$ 175.00
6/12/2015	Brady	Analyze discovery produced by DOJ with SMF's notes and provide feedback to SMF re potential uses for information obtained therein.	0.70	\$ 350.00	\$ 245.00
6/12/2015	Franklin	Revise notes for further follow up and potentially further discovery re documents produced as a result of expedited RFP resolution process.	0.70	\$ 375.00	\$ 262.50
6/12/2015	Franklin	Research options re responding to Defendants' proposed order; draft correspondence to Hakl. re same.	2.00	\$ 375.00	\$ 750.00
6/14/2015	Brady	Analyze strategy for proceeding with SMF and CDM in light of granting of MJOP.	0.40	\$ 350.00	\$ 140.00
6/14/2015	Franklin	Analyze strategy for proceeding with SAB and CDM in light of granting of MJOP.	0.40	\$ 375.00	\$ 150.00
6/14/2015	Franklin	Draft memorandum re implications of amending, or not amending, the complaint.	5.90	\$ 375.00	\$ 2,212.50
6/14/2015	Michel	Analyze strategy for proceeding with SAB and SMF in light of granting of MJOP.	0.40	\$ 650.00	\$ 260.00
6/15/2015	Brady	Exchange emails with JAS and SMF re [REDACTED]	0.30	\$ 350.00	\$ 105.00
6/15/2015	Franklin	Final revisions to proposed order and cover letter re same.	0.60	\$ 375.00	\$ 225.00
6/15/2015	Franklin	Review and revise proposed order based on SAB's comments	1.50	\$ 375.00	\$ 562.50

Date	Timekeeper	Description	Hours	Rate	Amount
6/15/2015	Franklin	Continue drafting memo re options related to amending complaint and potential [REDACTED]	1.70	\$ 375.00	\$ 637.50
6/16/2015	Franklin	Research recent ruling against Jerry Brown re misuse of settlement money to fill budget gaps.	0.30	\$ 375.00	\$ 112.50
6/16/2015	Franklin	Commence drafting proposed amended complaint research proper tax classification of DROS Fee (e.g., property, use, privilege).	4.80	\$ 375.00	\$ 1,800.00
6/16/2015	Quesada	Telephone conference with court reporter K. Greiner re 6/5/15 hearing transcript; meet with SMF re cost of normal turn around re expedited; email to K. Greiner ordering expedited transcript.	0.20	\$ 170.00	\$ 34.00
6/17/2015	Franklin	Meet with SAB re strategy on scope of [REDACTED]	0.10	\$ 375.00	\$ 37.50
6/17/2015	Franklin	Commence review of transcript of June 5, 2015, hearing.	0.10	\$ 375.00	\$ 37.50
6/17/2015	Franklin	Complete drafting proposed amended complaint, research related thereto, including 2 meetings with MEL re research projects related thereto.	4.30	\$ 375.00	\$ 1,612.50
6/17/2015	Quesada	Receipt, review and analyze email from court reporter attaching transcript of 6/5/15 hearing; save and profile transcript; email transcript to SMF; check request for transcript.	0.30	\$ 170.00	\$ 51.00
6/18/2015	Brady	Meeting with SMF re amending complaint.	0.80	\$ 350.00	\$ 280.00
6/18/2015	Brady	Review and revise proposed amended complaint and provide feedback to SMF.	1.30	\$ 350.00	\$ 455.00
6/18/2015	Franklin	Email to opposing counsel re extending MTC deadline re recent meet-and-confer letters.	0.10	\$ 375.00	\$ 37.50
6/18/2015	Franklin	Complete review of hearing transcript and email opposing counsel re same.	0.20	\$ 375.00	\$ 75.00
6/18/2015	Franklin	Meet with SAB re his comments for preparing first amended complaint, review same.	0.80	\$ 375.00	\$ 300.00
6/23/2015	Brady	Analyze with SMF strategy for responding to opposing counsel's proposal for the proposed order re MJOP for positioning case and appeal best.	0.30	\$ 350.00	\$ 105.00
6/23/2015	Franklin	Meet with SAB re strategy re proposed order drafting.	0.30	\$ 375.00	\$ 112.50
6/23/2015	Franklin	Telecon with opposing counsel re attempting to draft proposed order re MJOP and related discovery issues.	1.20	\$ 375.00	\$ 450.00
6/23/2015	Franklin	Research assertions re potential [REDACTED]	1.60	\$ 375.00	\$ 600.00
6/23/2015	Quesada	Transcribe tape re Senate Sub Committee 5 hearing on April 30, 2015.	5.00	\$ 170.00	\$ 850.00
6/24/2015	Franklin	Analyze SB 140 hearing for potential discovery topics in this action.	1.10	\$ 375.00	\$ 412.50
6/24/2015	Franklin	Draft letter to opposing counsel re inability to sign off on MJOP proposed order, revise per second draft proposed order produced by opposing counsel on 6/24.	5.90	\$ 375.00	\$ 2,212.50
6/25/2015	Franklin	Revise letter to opposing counsel in response to second draft proposed order.	3.50	\$ 375.00	\$ 1,312.50
6/26/2015	Brady	Meeting with SMF re letter to opposing counsel re content of proposed order.	0.10	\$ 350.00	\$ 35.00
6/26/2015	Brady	Review and revise letter to opposing counsel re proposed order.	0.60	\$ 350.00	\$ 210.00
6/26/2015	Franklin	Commence drafting motion for leave to amend.	1.50	\$ 375.00	\$ 562.50
6/26/2015	Franklin	Continue revising letter to opposing counsel in response to second draft proposed order.	2.80	\$ 375.00	\$ 1,050.00
6/29/2015	Brady	Analyze issues with SMF re letter to opposing counsel re proposed order on MJOP.	0.20	\$ 350.00	\$ 70.00
6/29/2015	Franklin	Meeting with CDM re status.	0.30	\$ 375.00	\$ 112.50
6/29/2015	Franklin	Analyze document provided by CDM re penalty assessment re potential applicability to case.	0.70	\$ 375.00	\$ 262.50
6/29/2015	Franklin	Continue to draft motion for leave; revise letter to opposing counsel re drafting proposed order, including meeting with SAB.	3.50	\$ 375.00	\$ 1,312.50
6/29/2015	Michel	Meeting with SMF re status.	0.30	\$ 650.00	\$ 195.00
6/29/2015	Michel	Review and forward document to SMF re [REDACTED] re potential [REDACTED]	0.30	\$ 650.00	\$ 195.00
6/30/2015	Franklin	Final revision of letter to opposing counsel re need for clear MJOP order.	1.50	\$ 375.00	\$ 562.50
6/30/2015	Franklin	Complete motion for leave to amend, research re [REDACTED]	1.70	\$ 375.00	\$ 637.50
7/1/2015	Franklin	Revise proposed first amended complaint per SAB's comments.	0.70	\$ 375.00	\$ 262.50
7/1/2015	Franklin	Revise motion to amend; .3 re email to opposing counsel re setting hearing date and meeting with LLQ re same.	0.70	\$ 375.00	\$ 262.50
7/1/2015	Quesada	Telephone conference with clerk of court re availability for hearing on motion to amend complaint; calendar reminder to call on 7/7/15.	0.20	\$ 170.00	\$ 34.00
7/2/2015	Brady	Meeting with SMF re revisions to draft amended complaint and analyze proposed revisions.	0.20	\$ 350.00	\$ 70.00
7/2/2015	Franklin	Meet with SAB re revising draft amended complaint.	0.20	\$ 375.00	\$ 75.00
7/2/2015	Quesada	Receipt, review and analyze letter from opposing counsel enclosing proposed order after 6-5-15 hearing; profile into imange and save on internal case docket.	0.20	\$ 170.00	\$ 34.00
7/6/2015	Quesada	Calendar dates and distribute to interested parties re deadline to file motion to compel re discovery; send outlook invite to SMF.	0.30	\$ 170.00	\$ 51.00
7/10/2015	Franklin	Meet with JAS re potential [REDACTED] (.1), review same.	0.40	\$ 375.00	\$ 150.00
7/20/2015	Brady	Meeting with SMF re status of case and strategy for proceeding.	0.10	\$ 350.00	\$ 35.00
7/20/2015	Franklin	Meet with SAB re status of matter.	0.10	\$ 375.00	\$ 37.50
7/21/2015	Franklin	Draft status letter to opposing counsel, follow up with LLQ re scheduling motion for leave to amend complaint.	1.40	\$ 375.00	\$ 525.00
7/21/2015	Quesada	Telephone conference with clerk of court re hearing dates for Motion for Leave to Amend Compliant; email to SMF re same.	0.20	\$ 170.00	\$ 34.00
7/21/2015	Quesada	Telephone conference with Sacramento Superior Court to schedule hearing on Motion for Leave to Amend Complaint; calendar hearing date and deadlines to file Motion, Opposition and Reply; send Outlook invites to SMF.	0.30	\$ 170.00	\$ 51.00
7/27/2015	Brady	Analyze strategy for proceeding in light of order granting MJOP with SMF.	0.10	\$ 350.00	\$ 35.00
7/27/2015	Franklin	Analyze strategy for proceeding in light of order granting MJOP with SAB.	0.10	\$ 375.00	\$ 37.50
7/27/2015	Franklin	Review order re MJOP, continue drafting discovery status letter to opposing counsel.	1.20	\$ 375.00	\$ 450.00
7/27/2015	Franklin	Revise draft amended complaint; research [REDACTED]	1.20	\$ 375.00	\$ 450.00
7/28/2015	Brady	Analyze strategy re [REDACTED] with SMF to determine whether i [REDACTED]	0.60	\$ 350.00	\$ 210.00
7/28/2015	Franklin	Meet with SAB to discuss possible bifurcation motion.	0.30	\$ 375.00	\$ 112.50
8/3/2015	Franklin	Email opposing counsel re need for response to status letter sent 07/27/15.	0.10	\$ 375.00	\$ 37.50
8/3/2015	Franklin	Analyze bond defeasement case for potential applicability to improper holding of funds in Gentry.	0.20	\$ 375.00	\$ 75.00
8/3/2015	Franklin	Research viability re retroactive use argument.	0.30	\$ 375.00	\$ 112.50
8/3/2015	Franklin	Commence drafting supplemental brief re retroactive application of SB 819 re DROS fund.	1.20	\$ 375.00	\$ 450.00
8/5/2015	Brady	Meeting with CDM and SMF re status of case and strategy for proceeding.	0.50	\$ 350.00	\$ 175.00

Date	Timekeeper	Description	Hours	Rate	Amount
8/5/2015	Franklin	Telecon with opposing counsel re pending issues.	0.40	\$ 375.00	\$ 150.00
8/5/2015	Franklin	Meet with CDM and SAB re what claims to make with information garnered from document production.	0.50	\$ 375.00	\$ 187.50
8/5/2015	Michel	Meeting with SAB and SMF re status of case and strategy for proceeding.	0.50	\$ 650.00	\$ 325.00
8/6/2015	Brady	Analyze issues re amending complaint and opposing motion to strike with SMF.	0.20	\$ 350.00	\$ 70.00
8/6/2015	Franklin	Complete supplemental brief re DOJ's attempt to have the retroactive use of funds claim stricken from complaint. including .2 meeting with SAB and .1 meeting with MEL.	6.00	\$ 375.00	\$ 2,250.00
8/7/2015	Quesada	Review and revise Plaintiffs' Supplemental Brief in Response to Order of July 20, 2015; telephone call to Nationwide Legal to confirm they are available for filing; email same to Nationwide for filing; serve same to defense counsel via US Mail and email.	0.50	\$ 170.00	\$ 85.00
8/10/2015	Franklin	Draft third round of POD.	2.10	\$ 375.00	\$ 787.50
8/11/2015	Brady	Analyze strategy for proceeding with case in light of opposing counsel's comments with SMF.	0.40	\$ 350.00	\$ 140.00
8/11/2015	Franklin	Analyze strategy for proceeding with case in light of opposing counsel's comments with SAB.	0.40	\$ 375.00	\$ 150.00
8/12/2015	Brady	Meeting with SMF re strategy for pursuing [REDACTED]	0.20	\$ 350.00	\$ 70.00
8/12/2015	Franklin	Meeting with SAB re strategy for pursuing [REDACTED]	0.20	\$ 375.00	\$ 75.00
8/12/2015	Franklin	Discovery meet-and-confer call with opposing counsel.	1.30	\$ 375.00	\$ 487.50
8/12/2015	Franklin	Continue research and attempt to correlate records to determine [REDACTED] .2 revise draft third set of SI.	5.20	\$ 375.00	\$ 1,950.00
8/13/2015	Brady	Analyze strategy for developing alternative claims with SMF.	0.20	\$ 350.00	\$ 70.00
8/13/2015	Franklin	Analyze strategy for developing alternative claims with SAB.	0.20	\$ 375.00	\$ 75.00
8/13/2015	Franklin	Continue drafting discovery (RFP and SI Set 3).	0.60	\$ 375.00	\$ 225.00
8/13/2015	Franklin	Continue research of budget documents to identify [REDACTED], add related questions to Special Interrogatory Set Three and Request for Production of Documents Set Three, create [REDACTED] commence detailed analysis of document produced by state controller's office base on newly learned information re legal service account # and other codes.	5.40	\$ 375.00	\$ 2,025.00
8/17/2015	Franklin	Follow up email to opposing counsel re production of information that was agreed to be produced by August 14, 2015.	0.10	\$ 375.00	\$ 37.50
8/17/2015	Quesada	Review and revise documents produced by opposing counsel; create single PDFs per SMF instruction; OCR all files.	3.60	\$ 170.00	\$ 612.00
8/19/2015	Franklin	Respond to opposing counsel's question re dates referred to in discovery re documents provided to Brady Campaign for Gun Violence.	0.10	\$ 375.00	\$ 37.50
8/19/2015	Franklin	Analyze response to most recent meet-and-confer letter, including .4 telecon with opposing counsel re same.	0.90	\$ 375.00	\$ 337.50
8/19/2015	Quesada	Receipt, review and analyze email from Haki with additional document production to Request for Production, Set Two in response to Nos. 40, 41 and 42; profile in imanager and update internal case docket; add documents to master PDF with all documents produced by defendants.	0.70	\$ 170.00	\$ 119.00
8/20/2015	Franklin	Create list of income streams going into the DROS Special Account, indicating if the fees collected are to be cost neutral or absorbed by the DROS Special Account.	1.60	\$ 375.00	\$ 600.00
8/21/2015	Franklin	Continue drafting spreadsheet re [REDACTED] and further special interrogatories and requests for production, set three.	6.40	\$ 375.00	\$ 2,400.00
8/24/2015	Brady	Analyze issues re documents that may form basis of potential discovery requests with SMF.	0.20	\$ 350.00	\$ 70.00
8/24/2015	Franklin	Add to RFP and SI, set 3; .2 telecon with SAB re same.	1.20	\$ 375.00	\$ 450.00
8/25/2015	Franklin	Continue to add questions to RFP and SI, set 3; research re scope of "legislator's privilege."	2.60	\$ 375.00	\$ 975.00
8/25/2015	Quesada	Telephone conference with Sue, clerk of court re December 11, 2015 hearing date being reserved; email to SMF re same.	0.20	\$ 170.00	\$ 34.00
8/26/2015	Quesada	Receipt, review and analyze letter from A. Haki with additional response to Request for Production of Documents Nos. 40, 41 and 42 received via mail.	0.10	\$ 170.00	\$ 17.00
8/31/2015	Franklin	Email CDM re [REDACTED] meet briefly with SAB re same.	0.20	\$ 375.00	\$ 75.00
8/31/2015	Franklin	Per CDM, review information [REDACTED] re potential [REDACTED]	0.50	\$ 375.00	\$ 187.50
8/31/2015	Franklin	Review [REDACTED] research Proposition 218 cases for potential analogy arguments.	1.80	\$ 375.00	\$ 675.00
9/1/2015	Franklin	Analyze the Court's order of August 31 re discovery, email SAB re same.	0.60	\$ 375.00	\$ 225.00
9/2/2015	Franklin	Finalize third round of discovery, draft (i.e., cut and paste) discovery re questions declared moot in August 31, 2015, order, for use when Motion to Amend is granted; review legislative history on penal code section 12076 to determine [REDACTED] extensive research on budgetary and LAO documents re POD drafting.	5.90	\$ 375.00	\$ 2,212.50
9/2/2015	Quesada	Calendar dates and distribute to interested parties re supplemental responses from defendants and deadline for plaintiffs to file motion to compel; send outlook invite to SMF.	0.20	\$ 170.00	\$ 34.00
9/3/2015	Franklin	Analyze supplement responses	0.40	\$ 375.00	\$ 150.00
9/3/2015	Quesada	Review and revise discovery requests to defendants; troubleshoot formatting in requests; send to SMF via email.	2.30	\$ 170.00	\$ 391.00
9/7/2015	Franklin	Review supplemental responses, prepare notes for meet-and-confer re same.	1.50	\$ 375.00	\$ 562.50
9/8/2015	Franklin	Review and revise motion for leave and draft amended complaint.	3.60	\$ 375.00	\$ 1,350.00
9/9/2015	Franklin	Prepare for meet-and-confer, review notes.	0.10	\$ 375.00	\$ 37.50
9/9/2015	Franklin	Meet-and-confer teleconference with opposing counsel re previously produced discovery responses and other issues.	0.50	\$ 375.00	\$ 187.50
9/9/2015	Quesada	Receipt, review and analyze amended discovery responses; update internal case docket with documents.	0.90	\$ 170.00	\$ 153.00
9/10/2015	Brady	Email MEL and SMF re status of brief and plan re finalizing and filing.	0.10	\$ 350.00	\$ 35.00
9/10/2015	Franklin	Email MEL and SAB re status of brief and plan re finalizing and filing.	0.10	\$ 375.00	\$ 37.50
9/15/2015	Franklin	Analyze discovery responses produced by Defendants, inc. .1 re email to SAB re same.	1.50	\$ 375.00	\$ 562.50

Date	Timekeeper	Description	Hours	Rate	Amount
9/17/2015	Brady	Meeting with SMF re strategy for [REDACTED] discovery [REDACTED]	0.20	\$ 350.00	\$ 70.00
9/17/2015	Franklin	Meeting with SAB re strategy for [REDACTED] discovery [REDACTED]	0.20	\$ 375.00	\$ 75.00
9/17/2015	Quesada	Receipt, review and analyze email from A. Haki with letter and supplemental discovery responses; save into imanager and update internal case docket.	0.70	\$ 170.00	\$ 119.00
9/18/2015	Quesada	Receipt, review and analyze email with supplemental and amended responses to discovery requests; confirmed that same responses as received via email dated 9/15/15.	0.20	\$ 170.00	\$ 34.00
9/23/2015	Franklin	Email opposing counsel re failure to provide verifications, telecon with opposing counsel re same.	0.20	\$ 375.00	\$ 75.00
9/29/2015	Brady	Review and revise draft motion to amend complaint and proposed amended complaint.	0.80	\$ 350.00	\$ 280.00
9/29/2015	Franklin	Final review to determine if motion to compel is called for re responses with motion deadline 9/30/15.	0.10	\$ 375.00	\$ 37.50
9/29/2015	Franklin	Review motion for leave prior to providing copy to CDM for review, analyze [REDACTED] [REDACTED] [REDACTED]	0.70	\$ 375.00	\$ 262.50
9/29/2015	Michel	Review motion for leave drafted SMF.	0.50	\$ 650.00	\$ 325.00
9/30/2015	Brady	Meet with SMF re his proposed revisions to motion for leave to file amend complaint.	0.10	\$ 350.00	\$ 35.00
9/30/2015	Brady	Meet with SMF re documents produced in response to POD # 43.	0.30	\$ 350.00	\$ 105.00
9/30/2015	Brady	Review and revise draft motion for leave to amend complaint with SMF's latest revisions.	0.70	\$ 350.00	\$ 245.00
9/30/2015	Franklin	Meet with SAB re his proposed revisions to motion for leave to file amend complaint.	0.10	\$ 375.00	\$ 37.50
9/30/2015	Franklin	Review documents produced in response to POD # 43.	0.20	\$ 375.00	\$ 75.00
9/30/2015	Franklin	Meet with SAB re documents produced in response to POD # 43.	0.30	\$ 375.00	\$ 112.50
9/30/2015	Franklin	Revise motion for leave to file amend complaint per comments of SAB, perform substantial research looking for [REDACTED] [REDACTED]	4.40	\$ 375.00	\$ 1,650.00
10/1/2015	Brady	Analyze strategy for proceeding with amended complaint with SMF.	0.30	\$ 350.00	\$ 105.00
10/1/2015	Franklin	Further revisions to motion for leave to file amended complaint, per comments of SAB, meet with SAB re same.	1.80	\$ 375.00	\$ 675.00
10/1/2015	Quesada	Receipt, review and analyze letter with documents from A. Haki dated 9-30-15; add documents to master file of all documents produced; forward link to SMF.	0.40	\$ 170.00	\$ 68.00
10/5/2015	Franklin	Email opposing counsel re request for extension to discovery response deadline; review emails and files to find information re same.	0.40	\$ 375.00	\$ 150.00
10/7/2015	Quesada	Receipt, review and analyze email exchange between SMF and A. Haki regarding extension for opposing counsel to respond to outstanding discovery; calendar new deadline and send outlook invite to SMF.	0.20	\$ 170.00	\$ 34.00
10/8/2015	Franklin	Finalize proposed first amended complaint, email opposing counsel re same.	0.40	\$ 375.00	\$ 150.00
10/21/2015	Quesada	Receipt, review and analyze email from A. Haki providing responses to discovery requests; update internal case docket and master sheet of documents produced; email to SMF and SAB advising that master documents has been updated.	0.60	\$ 170.00	\$ 102.00
10/22/2015	Quesada	Conduct research re [REDACTED], for use in finalizing amended complaint.	0.20	\$ 170.00	\$ 34.00
10/26/2015	Brady	Conduct correspondence re status of case with SMF.	0.20	\$ 350.00	\$ 70.00
10/26/2015	Franklin	Conduct correspondence re status of case with SAB.	0.20	\$ 375.00	\$ 75.00
10/27/2015	Brady	Review and revise motion for leave to amend complaint and draft amended complaint and provide feedback to SMF re points to address.	1.50	\$ 350.00	\$ 525.00
10/27/2015	Franklin	Meet with SAB Re his review of motion for leave to amend complaint and points to address.	0.50	\$ 375.00	\$ 187.50
11/5/2015	Brady	Meeting with SMF re [REDACTED] discovery [REDACTED]	0.20	\$ 350.00	\$ 70.00
11/5/2015	Franklin	Meeting with SAB re review of discovery responses, [REDACTED] [REDACTED]	0.20	\$ 375.00	\$ 75.00
11/5/2015	Franklin	Commence drafting meet-and-confer letter re recently produced discovery responses; review of same.	3.00	\$ 375.00	\$ 1,125.00
11/10/2015	Franklin	Status email to opposing counsel re discovery and revision of amended complaint to be submitted with motion; meet briefly with LLQ re same.	0.70	\$ 375.00	\$ 262.50
11/11/2015	Brady	Analyze strategy concerning and contents of proposed amended complaint with SMF.	0.50	\$ 350.00	\$ 175.00
11/11/2015	Franklin	Meet with SAB re potential [REDACTED]	0.50	\$ 375.00	\$ 187.50
11/11/2015	Franklin	Revise Motion for Leave to Amend and proposed amended complaint per SAB's comments (x2).	1.40	\$ 375.00	\$ 525.00
11/12/2015	Franklin	Finalize motion for leave to amend.	3.60	\$ 375.00	\$ 1,350.00
11/13/2015	Quesada	Review and revise Motion to Amend Complaint; Proposed Amended Complaint and Declaration of SMF in support; insert table of contents and table of authorities.	2.00	\$ 170.00	\$ 340.00
11/23/2015	Franklin	Continue drafting meet-and-confer letter.	0.30	\$ 375.00	\$ 112.50
12/1/2015	Franklin	Commence drafting Reply ISO motion for leave to amend.	7.30	\$ 375.00	\$ 2,737.50
12/2/2015	Franklin	Complete first draft of Reply ISO motion for leave to amend.	2.00	\$ 375.00	\$ 750.00
12/3/2015	Franklin	Revise Reply ISO motion for leave to amend.	0.90	\$ 375.00	\$ 337.50
12/3/2015	Quesada	Meeting with SMF regarding Reply brief.	0.10	\$ 170.00	\$ 17.00
12/4/2015	Quesada	Send/receive email to/from SMF re Reply in Support of Motion to Amend Complaint; meet with MDC regarding the same.	0.20	\$ 170.00	\$ 34.00
12/4/2015	Quesada	Review and revise Reply in support of Motion to File Amended Complaint; insert table of contents; scan and email to nationwide legal for filing in Sacramento Superior Court; email and mail to opposing counsel; update back page and send updated back page link to SMF and SAB; update internal excel spreadsheet docket.	1.30	\$ 170.00	\$ 221.00
12/7/2015	Brady	Receipt, review and analyze email from SMF re DOJ's recent response to POD.	0.20	\$ 350.00	\$ 70.00
12/7/2015	Franklin	Email to JAS and SAB re DOJ's recent response to POD.	0.20	\$ 375.00	\$ 75.00
12/7/2015	Franklin	Email to opposing counsel re extension for POD response and upcoming hearing.	0.30	\$ 375.00	\$ 112.50
12/7/2015	Franklin	Email to opposing counsel re extension for POD response and upcoming hearing.	0.30	\$ 375.00	\$ 112.50
12/7/2015	Quesada	Receipt, review and analyze opposing counsel additional responses to RFP 3, No. 70; add to master list of documents and update internal excel spreadsheet.	0.20	\$ 170.00	\$ 34.00
12/8/2015	Quesada	Meeting with SAB regarding [REDACTED] Motion for Leave to File First Amended Complaint.	0.10	\$ 170.00	\$ 17.00

Date	Timekeeper	Description	Hours	Rate	Amount
12/8/2015	Quesada	Send/receive email to/from CDM regarding tentative ruling in Gentry.	0.10	\$ 170.00	\$ 17.00
12/8/2015	Quesada	Telephone conference with Dept. 31 regarding Courtcall.	0.10	\$ 170.00	\$ 17.00
12/8/2015	Quesada	Telephone conference with clerk of court re appearing via court call; left message for her to call back; email to SMF regarding the same.	0.20	\$ 170.00	\$ 34.00
12/8/2015	Quesada	Send/receive email to/from SMF regarding appearing via court call or sending another attorney; email to CDM regarding the same.	0.20	\$ 170.00	\$ 34.00
12/8/2015	Quesada	Meeting with HV regarding hearing on Motion for Leave to Amend Compliant.	0.30	\$ 170.00	\$ 51.00
12/10/2015	Brady	Analyze tentative ruling granting motion to amend complaint and discuss strategy for proceeding with CDM and SMF.	0.80	\$ 350.00	\$ 280.00
12/10/2015	Franklin	Meet with SAB and CDM re tentative ruling granting motion to amend complaint; discuss strategy for proceeding.	0.40	\$ 375.00	\$ 150.00
12/10/2015	Michel	Meet with SAB and SMF re tentative ruling granting motion to amend complaint; discuss strategy for proceeding.	0.40	\$ 650.00	\$ 260.00
12/10/2015	Quesada	Conduct research re tentative ruling on motion for leave to file first amended complaint; download and send to SAB, SMF and CDM.	0.20	\$ 170.00	\$ 34.00
12/11/2015	Brady	Meetings with SMF re strategy for [REDACTED] in light of leave to file amended complaint being granted.	0.20	\$ 350.00	\$ 70.00
12/11/2015	Franklin	Meet with SAB 2x re tentative ruling granting motion for leave to amend.	0.20	\$ 375.00	\$ 75.00
12/11/2015	Franklin	Analyze tentative ruling granting motion for leave to amend.	0.20	\$ 375.00	\$ 75.00
12/11/2015	Franklin	Revise PO for Amended Complaint per court's order.	0.20	\$ 375.00	\$ 75.00
12/11/2015	Franklin	Meet with CDM re tentative ruling granting motion for leave to amend.	0.20	\$ 375.00	\$ 75.00
12/11/2015	Franklin	Revise Amended Complaint per court's order.	0.40	\$ 375.00	\$ 150.00
12/11/2015	Franklin	Research re best way to [REDACTED] draft letter re same.	1.60	\$ 375.00	\$ 600.00
12/11/2015	Michel	Meet with SMF re tentative ruling granting motion for leave to amend.	0.20	\$ 650.00	\$ 130.00
12/11/2015	Quesada	Send/receive email to/from A. Haki attaching Proposed Order re Plaintiffs' Motion for Leave to File First Amended Compliant.	0.20	\$ 170.00	\$ 34.00
12/14/2015	Franklin	Complete meet-and-confer letter.	2.70	\$ 375.00	\$ 1,012.50
12/14/2015	Quesada	Send/receive email to/from SMF confirming that responses to discovery requests have been profiled.	0.10	\$ 170.00	\$ 17.00
12/16/2015	Franklin	Meet-and-confer telecon with opposing counsel.	1.60	\$ 375.00	\$ 600.00
12/17/2015	Quesada	Receipt, review and analyze duplicate of opposing counsel's response to POD Set 3, question 70; update excel spreadsheet.	0.20	\$ 170.00	\$ 34.00
12/18/2015	Franklin	Meet with MDC re final review of First Amended Complaint.	0.10	\$ 375.00	\$ 37.50
12/18/2015	Franklin	Analyze scope of motion for leave ruling's clarification of MJOP ruling, determine if [REDACTED] finalize proposed order and draft cover letter, meet with LLQ re same.	0.90	\$ 375.00	\$ 337.50
12/18/2015	Quesada	Send/receive email to/from T. Campbell of letter sent to Judge Kenny enclosing proposed order.	0.10	\$ 170.00	\$ 17.00
12/28/2015	Franklin	Draft renewal motion.	1.50	\$ 375.00	\$ 562.50
12/29/2015	Quesada	Telephone conference with court regarding hearing availability for hearing motions.	0.20	\$ 170.00	\$ 34.00
12/30/2015	Franklin	Continue drafting renewal motion re RFA.	2.10	\$ 375.00	\$ 787.50
12/30/2015	Quesada	Review and revise amended complaint to put in proper dates; give to SMF for final revision.	0.10	\$ 170.00	\$ 17.00
1/4/2016	Brady	Review and revise motion to renew requests for discovery.	0.80	\$ 350.00	\$ 280.00
1/4/2016	Franklin	Determine if [REDACTED] in budget report for 2013-2014.	0.40	\$ 375.00	\$ 150.00
1/5/2016	Franklin	Email opposing counsel re setting date for renewal motion hearing.	0.10	\$ 375.00	\$ 37.50
1/5/2016	Quesada	Telephone conference with Amy from Dept. 31 regarding available hearing dates; email to SMF regarding the same.	0.20	\$ 170.00	\$ 34.00
1/6/2016	Franklin	Revise Renewal Motion per comments of SAB.	0.80	\$ 375.00	\$ 300.00
1/7/2016	Franklin	Meeting with SAB re revisions to renewal motion to compel.	0.10	\$ 375.00	\$ 37.50
1/7/2016	Franklin	Complete revisions to draft renewal motion.	0.90	\$ 375.00	\$ 337.50
1/8/2016	Franklin	Meet with JAS re potential argument re [REDACTED]	0.20	\$ 375.00	\$ 75.00
1/8/2016	Franklin	Draft Declaration ISO Renewal Motion re RFA.	0.80	\$ 375.00	\$ 300.00
1/8/2016	Franklin	Draft stipulation re expedited resolution of discovery dispute on renewed motion; email opposing counsel re same.	2.20	\$ 375.00	\$ 825.00
1/12/2016	Franklin	Email opposing counsel re stipulation re renewal motion.	0.10	\$ 375.00	\$ 37.50
1/12/2016	Franklin	Analyze discovery responses re POD; update notes re same.	2.00	\$ 375.00	\$ 750.00
1/13/2016	Franklin	Draft Renewal motion re FI and Declaration in support thereof.	1.40	\$ 375.00	\$ 525.00
1/13/2016	Quesada	Send/receive email to/from SMF regarding discovery responses dated October 19, 2015.	0.20	\$ 170.00	\$ 34.00
1/18/2016	Franklin	Email opposing counsel re failure to timely produce supplemental responses.	0.10	\$ 375.00	\$ 37.50
1/18/2016	Franklin	Email SAB re question concerning potential disclosure of documents obtained in discovery.	0.20	\$ 375.00	\$ 75.00
1/20/2016	Brady	Receipt, review and analyze email from SMF re potential argument re [REDACTED]	0.20	\$ 350.00	\$ 70.00
1/20/2016	Franklin	Email SAB re potential argument re [REDACTED]	0.20	\$ 375.00	\$ 75.00
1/20/2016	Franklin	Analyze recent supplemental discovery response; update discovery response notes.	1.30	\$ 375.00	\$ 487.50
1/20/2016	Quesada	Receipt, review and analyze opposing counsel's additional responses to request for production no. 3; insert documents into master PDF of all documents produced; scan and profile SMF signature page to stipulation and insert into stipulation; forward to SMF.	0.40	\$ 170.00	\$ 68.00
1/21/2016	Franklin	Finalize renewal motions and declarations.	1.00	\$ 375.00	\$ 375.00
1/21/2016	Quesada	Draft proposed orders to renewed discovery motions; telephone call to Court regarding preference regarding filing or lodging proposed orders; revise proofs of service on renewed discovery motions and declarations in support of discovery motions.	0.70	\$ 170.00	\$ 119.00
1/22/2016	Franklin	Complete initial review of fur. resp. to SI set 3.	0.10	\$ 375.00	\$ 37.50
1/25/2016	Franklin	Draft errata re separate statement for FI and RFA motions; final review of same and meet with LLQ re same.	0.40	\$ 375.00	\$ 150.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/26/2016	Franklin	Analyze further responses to SI set 3, identify issues left for follow-up meet-and-confer letter.	0.20	\$ 375.00	\$ 75.00
1/26/2016	Quesada	Telephone conference with Sacramento Clerk of the Court regarding misnaming of renewed motion to compel further responses to request for admissions; email to SMF regarding the same.	0.30	\$ 170.00	\$ 51.00
2/1/2016	Franklin	Analyze Defendants' answer to amended complaint; determine if a demurrer or follow up discovery is necessary.	1.20	\$ 375.00	\$ 450.00
2/2/2016	Franklin	Meetings with JAS re: [REDACTED].	0.50	\$ 375.00	\$ 187.50
2/2/2016	Franklin	Commence drafting final meet and confer letter re SI Set 3 and POD Set 3; close analysis of most recent batch of documents produced re RFP Set Three.	0.60	\$ 375.00	\$ 225.00
2/2/2016	Franklin	Analyze SB 140 report for [REDACTED] discovery, and for use in motion to compel [REDACTED].	0.90	\$ 375.00	\$ 337.50
2/2/2016	Franklin	Email opposing counsel re drafting joint statement; commence drafting joint statement.	1.10	\$ 375.00	\$ 412.50
2/4/2016	Quesada	Telephone conference with clerk of court regarding status of Judge signing order regarding discovery stipulation; email to SMF with status.	0.20	\$ 170.00	\$ 34.00
2/4/2016	Quesada	Review and revise supplemental discovery responses from Defendants; update case profile (excel spreadsheet).	0.30	\$ 170.00	\$ 51.00
2/4/2016	Quesada	Telephone conference with clerk of the court regarding minute entry order filed; download minute entry order and send to SMF; update internal excel docket sheet.	0.30	\$ 170.00	\$ 51.00
2/5/2016	Franklin	Meet with MDC to discuss assignment to draft chart re [REDACTED].	0.10	\$ 375.00	\$ 37.50
2/8/2016	Franklin	Continue drafting meet-and-confer letter.	2.00	\$ 375.00	\$ 750.00
2/9/2016	Brady	Send/receive email to/from JAS and SMF re: [REDACTED].	0.10	\$ 350.00	\$ 35.00
2/9/2016	Brady	Meet with SMF re DOJ responses to discovery asserting privileges.	0.30	\$ 350.00	\$ 105.00
2/9/2016	Brady	Exchange emails with SMF re specific discovery dispute related to Raahauge's matter being classified as an "APPS" case.	0.50	\$ 350.00	\$ 175.00
2/9/2016	Franklin	Review recent SB 140 report to determine if any other false "APPS cases" are identified.	0.10	\$ 375.00	\$ 37.50
2/9/2016	Franklin	Meet with SAB re discovery dispute on "APPS case" issue.	0.30	\$ 375.00	\$ 112.50
2/9/2016	Franklin	Draft bullet point list of interesting findings during Gentry discovery for presentation during gun team meeting.	1.00	\$ 375.00	\$ 375.00
2/9/2016	Franklin	Complete meet-and-confer letter; email SAB re specific discovery dispute [REDACTED].	2.90	\$ 375.00	\$ 1,087.50
2/10/2016	Franklin	Continue drafting bullet point list of interesting findings during Gentry discovery for presentation during gun team meeting.	1.10	\$ 375.00	\$ 412.50
2/15/2016	Brady	Send/receive email to/from JAS, SAB, and CDM re: [REDACTED].	0.40	\$ 350.00	\$ 140.00
2/15/2016	Michel	Send/receive email to/from JAS, SAB, and SMF re: [REDACTED].	0.40	\$ 650.00	\$ 260.00
2/17/2016	Brady	Analyze issues re impacts of proposed legislation with SMF.	0.10	\$ 350.00	\$ 35.00
2/17/2016	Franklin	Email opposing counsel re drafting joint statement.	0.20	\$ 375.00	\$ 75.00
2/17/2016	Franklin	Create appendix for Joint Statement.	0.70	\$ 375.00	\$ 262.50
2/17/2016	Michel	Send/receive email to/from JAS, CBM, SMF, and SAB re: [REDACTED].	0.10	\$ 650.00	\$ 65.00
2/18/2016	Franklin	Finalize meet-and-confer letter and draft appendix.	0.90	\$ 375.00	\$ 337.50
2/18/2016	Franklin	Continue drafting appendix for Joint Statement; reorganize for ease of the court.	1.10	\$ 375.00	\$ 412.50
2/22/2016	Quesada	Review and revise meet and confer letter to A. Halk; mail to Halk and update internal case docket.	0.30	\$ 170.00	\$ 51.00
2/26/2016	Franklin	Analyze recent letter from Kamala Harris to Legislature re requesting more money; review potential bullet point questions for sub-committee hearing.	0.20	\$ 375.00	\$ 75.00
2/29/2016	Franklin	Research recent proposition 26 cases.	0.10	\$ 375.00	\$ 37.50
2/29/2016	Franklin	Analyze Newhall case to confirm [REDACTED] drafting request for publication of Rehabilitation case.	0.20	\$ 375.00	\$ 75.00
2/29/2016	Franklin	Telephonic meet-and-confer re POD (set three) and SI (set three) Responses; follow up email re same.	1.00	\$ 375.00	\$ 375.00
2/29/2016	Quesada	Conduct research re filing proof of service for first amended complaint.	0.10	\$ 170.00	\$ 17.00
3/1/2016	Quesada	Review and revise master list of documents produced by opposing counsel per SMF request.	0.20	\$ 170.00	\$ 34.00
3/4/2016	Franklin	Initial review of Defendants' portion of the parties' joint statement.	0.10	\$ 375.00	\$ 37.50
3/7/2016	Franklin	Commence drafting letter seeking publication of Rehabilitation case.	3.30	\$ 375.00	\$ 1,237.50
3/8/2016	Franklin	Commence drafting Plaintiffs' portion of joint document dispute statement.	0.80	\$ 375.00	\$ 300.00
3/8/2016	Franklin	Complete request for publication.	2.40	\$ 375.00	\$ 900.00
3/9/2016	Franklin	Continue drafting Plaintiffs' portion of Joint Statement re Renewed Motion; .4 re obtaining documents for JAS re APPS-related subcommittee hearing.	7.30	\$ 375.00	\$ 2,737.50
3/11/2016	Franklin	Meet with GW re her revisions to Request for Publication of The Rehabilitation Center of Beverly Hills v. Department of Health Care Services, California Court of Appeal, Third District, Case No. C070361, Filed February 22, 2016.	0.10	\$ 375.00	\$ 37.50
3/11/2016	Franklin	Meet with GW re assignment of proofreading and editing the Request for Publication of The Rehabilitation Center of Beverly Hills v. Department of Health Care Services, California Court of Appeal, Third District, Case No. C070361, Filed February 22, 2016.	0.10	\$ 375.00	\$ 37.50
3/11/2016	Franklin	Finalize request for publication of The Rehabilitation Center.	1.60	\$ 375.00	\$ 600.00
3/11/2016	Franklin	Continue drafting Plaintiffs' portion of Joint Statement re Renewed Motion.	4.40	\$ 375.00	\$ 1,650.00
3/11/2016	Quesada	Telephone conference with 3rd Appellate District Court regarding Request for Publication; set up e-filing for SMF.	0.30	\$ 170.00	\$ 51.00
3/14/2016	Brady	Meeting with SMF outline of MSJ based on element of claims in amended complaint.	0.10	\$ 350.00	\$ 35.00
3/14/2016	Brady	Receive and reply to email from SMF re information needed from file re per transaction cost for DROS process.	0.20	\$ 350.00	\$ 70.00
3/14/2016	Franklin	Meet with CDM and WLS re CDM's interest in [REDACTED].	0.10	\$ 375.00	\$ 37.50
3/14/2016	Franklin	Revise joint statement arguments.	1.50	\$ 375.00	\$ 562.50
3/14/2016	Michel	Meet with SMF and WLS re interest in [REDACTED] y.	0.10	\$ 650.00	\$ 65.00
3/15/2016	Brady	Conduct correspondence with expert J. Lott re [REDACTED].	0.20	\$ 350.00	\$ 70.00
3/15/2016	Quesada	Receipt, review and analyze additional discovery responses and updated privilege log; update internal docket on excel and add documents to master list of documents; profile documents responsive to PRAR into image and forward same to SMF.	0.70	\$ 170.00	\$ 119.00

Date	Timekeeper	Description	Hours	Rate	Amount
3/16/2016	Brady	Send/receive email to/from JAS CDM, and SMF re: AB-1999 and effect on APPS.	0.20	\$ 350.00	\$ 70.00
3/16/2016	Franklin	Email opposing counsel re extending MTC deadline for third round of discovery.	0.10	\$ 375.00	\$ 37.50
3/16/2016	Michel	Send/receive email to/from JAS SAB, and SMF re: AB-1999 and effect on APPS.	0.20	\$ 650.00	\$ 130.00
3/16/2016	Quesada	Receipt, review and analyze email from SMF with evidence; save into imanager and distribute to SMF.	0.20	\$ 170.00	\$ 34.00
3/21/2016	Franklin	Analyze recent Proposition 26 case.	0.10	\$ 375.00	\$ 37.50
3/21/2016	Franklin	Draft email to opposing counsel re follow up on discovery issues and providing joint statement; research re verification issue; review gas tax law [REDACTED]	0.40	\$ 375.00	\$ 150.00
3/21/2016	Franklin	Revise joint statement.	1.80	\$ 375.00	\$ 675.00
3/22/2016	Brady	Multiple meetings with SMF re discovery strategy.	0.50	\$ 350.00	\$ 175.00
3/22/2016	Franklin	Meet with SAB (.2) and review options re [REDACTED] SI # 2.	0.50	\$ 375.00	\$ 187.50
3/23/2016	Franklin	Email opposing counsel re providing estimate of per transaction costs and follow up on other matters; rewrite email.	0.40	\$ 375.00	\$ 150.00
3/28/2016	Franklin	Analyze recent discovery response from defendants, commence drafting motion to compel.	1.00	\$ 375.00	\$ 375.00
3/29/2016	Franklin	Email opposing counsel re extending deadline for MTC pursuant to offer made in his most recent letter.	0.10	\$ 375.00	\$ 37.50
3/29/2016	Franklin	Continue drafting MTC SI responses; research possible argument that [REDACTED]	6.60	\$ 375.00	\$ 2,475.00
3/30/2016	Franklin	Meeting with JAS re: [REDACTED]	0.40	\$ 375.00	\$ 150.00
3/31/2016	Franklin	Continue drafting motion to compel SI responses; add discovery request to forthcoming discovery.	5.10	\$ 375.00	\$ 1,912.50
3/31/2016	Quesada	Send/receive email to/from SMF regarding [REDACTED]	0.10	\$ 170.00	\$ 17.00
4/1/2016	Franklin	Complete draft MTC SI and Declaration and separate statement.	2.40	\$ 375.00	\$ 900.00
4/1/2016	Quesada	Telephone conference with Sue from Department 31 regarding available hearing dates; email to SMF regarding the same.	0.10	\$ 170.00	\$ 17.00
4/5/2016	Quesada	Telephone conference with clerk of court to reserve hearing date for motions to compel; email to SMF with available hearing date and to confirm which discovery responses will be the subject of the motions.	0.40	\$ 170.00	\$ 68.00
4/6/2016	Franklin	Analyze authority provided by MEL re judicial notice of facts in an order.	0.40	\$ 375.00	\$ 150.00
4/6/2016	Franklin	Continue drafting MTC re SI (Set Three) and documents related thereto.	1.90	\$ 375.00	\$ 712.50
4/6/2016	Quesada	Review and revise defendants' third amended responses to request for production of documents; update internal excel docket with responses.	0.10	\$ 170.00	\$ 17.00
4/7/2016	Franklin	Review Defendants' section of Joint Statement for changes from previously submitted draft; email LLQ requesting a [REDACTED] email opposing counsel re signing joint appendix.	0.30	\$ 375.00	\$ 112.50
4/11/2016	Brady	Meeting with SMF re analysis of documents indicating a [REDACTED]	0.20	\$ 350.00	\$ 70.00
4/11/2016	Franklin	Meet with LLQ re filing Joint Statement.	0.10	\$ 375.00	\$ 37.50
4/11/2016	Franklin	Meeting with SAB re analysis of documents indicating a DOJ analysis of the DROS Fee years ago and how to utilize in litigation.	0.20	\$ 375.00	\$ 75.00
4/11/2016	Franklin	Draft separate statement for MTC re SI set three.	0.90	\$ 375.00	\$ 337.50
4/11/2016	Franklin	Commence drafting documents for Motion to Compel Further Responses to RFP Set Four.	4.60	\$ 375.00	\$ 1,725.00
4/11/2016	Quesada	Review and revise Joint Statement and Joint Appendix; email to A. Haki to sign for filing; revise proof of service.	0.30	\$ 170.00	\$ 51.00
4/11/2016	Quesada	Review and revise Defendant's Statement to Joint Statement Re Expedited Dispute Resolution Procedure to see if there are any differences; email to SMF regarding the same.	0.70	\$ 170.00	\$ 119.00
4/12/2016	Franklin	Meeting with SAB re [REDACTED]	0.20	\$ 375.00	\$ 75.00
4/12/2016	Franklin	Continue drafting documents for Motion to Compel Further Responses to RFP Set Four; update RFA (set four); research organizational and other codes to determine where funds are being used; meet briefly with JRD and then CBM re [REDACTED]	6.90	\$ 375.00	\$ 2,587.50
4/12/2016	Quesada	Send/receive email to/from SMF regarding calendaring motion to compel hearing on October 28, 2016.	0.10	\$ 170.00	\$ 17.00
4/13/2016	Franklin	Analyze DLE yearly reports.	0.80	\$ 375.00	\$ 300.00
4/13/2016	Franklin	Commence drafting Motion to Compel Further Responses and Production of Documents re RFP (set 3).	4.20	\$ 375.00	\$ 1,575.00
4/14/2016	Franklin	Research budgetary document re potential d [REDACTED] attempt to track basis for unit code subtotals.	1.70	\$ 375.00	\$ 637.50
4/14/2016	Franklin	Continue drafting Motion to Compel Further Responses and Production of Documents re RFP (set 3); .1 re responding to opposing counsel's email re having another meet-and-confer; 1.0 research budget changes regarding BOF's use of General Fund money and changes in internal attorney billing.	4.20	\$ 375.00	\$ 1,575.00
4/14/2016	Quesada	Receipt, review and analyze AG office Annual reports from 2007 - 2013; profile into imanager.	0.50	\$ 170.00	\$ 85.00
4/18/2016	Franklin	Perform meet and confer telecon.	0.30	\$ 375.00	\$ 112.50
4/18/2016	Franklin	Prepare for meet and confer re Gentry.	0.40	\$ 375.00	\$ 150.00
4/21/2016	Franklin	Send confirmation email to opposing counsel re meet-and-confer follow up.	0.30	\$ 375.00	\$ 112.50
4/24/2016	Franklin	Draft and finalize documents related to motions to compel further responses to SI (set three) and RFP (set three).	6.60	\$ 375.00	\$ 2,475.00
4/25/2016	Quesada	Review and revise Motion to Compel Special Interrogatories No. 3 and Request for Production, No. 3, Declaration of SMF in support of Motion to Compel, Separate Statement and Request for Judicial Notice; draft tables and finalize documents for filing with Sacramento County Superior Court; email to A. Haki and send via U.S. Mail.	2.30	\$ 170.00	\$ 391.00
5/16/2016	Quesada	Receipt, review and analyze Court's minute entry order; update excel docket sheet.	0.20	\$ 170.00	\$ 34.00
5/24/2016	Quesada	Receipt, review and analyze Notice Regarding Proposition 26 case.	0.20	\$ 170.00	\$ 34.00
6/3/2016	Franklin	Analyze discovery ruling, email CDM re same.	0.40	\$ 375.00	\$ 150.00
6/3/2016	Michel	Receipt, review and analyze email from SMF re discovery ruling.	0.30	\$ 650.00	\$ 195.00

Date	Timekeeper	Description	Hours	Rate	Amount
6/3/2016	Michel	Receipt, review and analyze 05/31/2016 Ruling on Submitted Matter.	0.50	\$ 650.00	\$ 325.00
6/3/2016	Quesada	Receipt, review and analyze ruling on motion to compel; calendar deadline for OC to submit responses to court ordered requests for admissions; update internal case docket with court ruling.	0.30	\$ 170.00	\$ 51.00
6/6/2016	Brady	Receive email from SMF re ruling on discovery motion and respond.	0.10	\$ 350.00	\$ 35.00
6/7/2016	Brady	Analyze strategy for handling discovery motion ruling with SMF.	0.20	\$ 350.00	\$ 70.00
6/7/2016	Franklin	Meet with SAB as to whether to draft RFAs to [REDACTED]	0.20	\$ 375.00	\$ 75.00
6/7/2016	Franklin	Draft RFAs to address order of court denying RFA that it held were too tied to Proposition 26 text.	0.90	\$ 375.00	\$ 337.50
6/30/2016	Franklin	Email opposing counsel re production of court-ordered responses.	0.10	\$ 375.00	\$ 37.50
7/5/2016	Franklin	Analyze court ordered responses to FI 17.1(b) 18, 19, 21, and 22.	0.20	\$ 375.00	\$ 75.00
7/7/2016	Michel	Receipt, review and analyze Def. Harris & Lindley's Third Amended Resp.'s to FI (SET ONE).	0.50	\$ 650.00	\$ 325.00
7/7/2016	Michel	Case management re pending discovery and litigation strategy.	2.00	\$ 650.00	\$ 1,300.00
7/11/2016	Franklin	Status conference with CDM and CBM re discovery responses.	0.10	\$ 375.00	\$ 37.50
7/11/2016	Michel	Status conference with SMF and CBM re discovery responses.	0.10	\$ 650.00	\$ 65.00
7/13/2016	Franklin	Meet with LLQ re doing a comparison of what Defendants produced under court order as opposed to prior FI responses; draft email to opposing counsel re same.	0.70	\$ 375.00	\$ 262.50
7/13/2016	Quesada	Review and revise defendants Second and Third Amended Responses to Form Interrogatories (set one) and compare the revisions, additions, deletions.	0.30	\$ 170.00	\$ 51.00
7/25/2016	Brady	Receipt, review and analyze proposed audit of DROS Account by Joint Legislative Audit Committee for use in discovery.	0.30	\$ 350.00	\$ 105.00
7/25/2016	Michel	Case management re pending discovery and litigation strategy.	2.00	\$ 650.00	\$ 1,300.00
7/26/2016	Franklin	Meeting with SAB re status of case and pending discovery.	0.10	\$ 375.00	\$ 37.50
7/26/2016	Franklin	Telecon with opposing counsel re confirming Plaintiffs' intent to limit any "benefit" claims other than the one provided in court-ordered response; .1 follow up with SAB re same.	0.70	\$ 375.00	\$ 262.50
7/26/2016	Franklin	Email CBM, JAS, SAB, CDM, and R. Griffith re [REDACTED]	1.20	\$ 375.00	\$ 450.00
8/3/2016	Franklin	Telecon with CBM, JAS, SAB, Roy Griffith, and others re status of matter.	0.40	\$ 375.00	\$ 150.00
8/3/2016	Franklin	Revise fourth round of discovery.	0.80	\$ 375.00	\$ 300.00
8/11/2016	Franklin	Final revisions and updates to discovery for Gentry.	5.30	\$ 375.00	\$ 1,987.50
8/15/2016	Franklin	Add RFAs based on information in re calculation of per transaction cost and other bases.	0.60	\$ 375.00	\$ 225.00
8/15/2016	Franklin	Perform research, locate data, and perform calculations as to [REDACTED]; email SAB re same.	1.60	\$ 375.00	\$ 600.00
8/19/2016	Franklin	Discovery followup telecon.	0.10	\$ 375.00	\$ 37.50
8/24/2016	Franklin	Status email to CDM re discovery issues and potential accounting review.	0.40	\$ 375.00	\$ 150.00
8/24/2016	Michel	Receive email from SMF re Status re discovery issues and potential accounting review.	0.20	\$ 650.00	\$ 130.00
8/29/2016	Brady	Receive and review and respond to email re documents to be reviewed by accountant.	0.10	\$ 350.00	\$ 35.00
8/29/2016	Franklin	Meet with RBV re finalizing discovery to be propounded 8/31.	0.10	\$ 375.00	\$ 37.50
8/29/2016	Franklin	Review and revise fourth round of discovery, finalize same, expand scope of PMQ notice; .3 identifying documents for CES to set up in a drop box for review by accountant.	5.70	\$ 375.00	\$ 2,137.50
8/31/2016	Franklin	Review discovery requests proofed by RBV, meet briefly with CLD re serving same.	1.00	\$ 375.00	\$ 375.00
9/8/2016	Michel	Case management re case strategy.	1.00	\$ 650.00	\$ 650.00
9/14/2016	Brady	Analyze deposition topic list and follow-up with SMF.	0.90	\$ 350.00	\$ 315.00
9/26/2016	Franklin	Brief call with opposing counsel re meeting-and-conferring regarding defendants' threatened motion for protective order.	0.10	\$ 375.00	\$ 37.50
9/26/2016	Franklin	Email opposing counsel re Defendants plan to seek protective order.	0.20	\$ 375.00	\$ 75.00
9/26/2016	Franklin	Prepare for meeting-and-conferring regarding defendants' threatened motion for protective order.	0.60	\$ 375.00	\$ 225.00
9/26/2016	Franklin	Meet-and-confer telecon with opposing counsel re potential protective order re recent discovery.	0.80	\$ 375.00	\$ 300.00
9/28/2016	Franklin	Research defense of protective order, email opposing counsel corrections re errors in recent set of discovery.	1.40	\$ 375.00	\$ 525.00
10/18/2016	Franklin	Continue drafting and revising reply ISO MTD.	1.30	\$ 375.00	\$ 487.50
10/19/2016	Franklin	Continue drafting reply.	0.70	\$ 375.00	\$ 262.50
10/20/2016	Franklin	Continue drafting and revising reply ISO MTD.	7.60	\$ 375.00	\$ 2,850.00
10/21/2016	Franklin	Finalize reply ISO Motions to Compel.	4.50	\$ 375.00	\$ 1,687.50
10/21/2016	Palmerin	Review Defendants' Opposition to Motion to Compel in my box and create Case Profile with docket information.	1.90	\$ 170.00	\$ 323.00
10/23/2016	Franklin	Continue drafting and revising reply ISO MTD.	7.60	\$ 375.00	\$ 2,850.00
10/27/2016	Franklin	Review documents and "tentative" ruling in preparation for hearing; telecon with LP re same.	0.20	\$ 375.00	\$ 75.00
10/27/2016	Palmerin	Telephone conference with SMF re Tentative Ruling for Motions to Compel.	0.10	\$ 170.00	\$ 17.00
10/27/2016	Palmerin	Telephone conference with Court Clerk to confirm appearance at the Motions to Compel hearing on 10/28/2016 and order Court Reporter. Email SMF to confirm.	0.10	\$ 170.00	\$ 17.00
10/28/2016	Palmerin	Telephone conference with SMF re continued motion to compel hearing date and deadline to file stipulation.	0.10	\$ 170.00	\$ 17.00
11/1/2016	Brady	Meeting with SMF and JRD to discuss litigation strategy in light of court's proposal on bifurcation of issues and discovery requests.	0.40	\$ 350.00	\$ 140.00
11/1/2016	Franklin	Email opposing counsel re drafting stipulation.	0.10	\$ 375.00	\$ 37.50
11/1/2016	Franklin	Analyze arguments for and against [REDACTED]	0.20	\$ 375.00	\$ 75.00
11/1/2016	Franklin	Meeting with SAB and JRD re strategy as to [REDACTED]	0.40	\$ 375.00	\$ 150.00
11/1/2016	Franklin	Analyze arguments for and against [REDACTED]	1.00	\$ 375.00	\$ 375.00
11/1/2016	Franklin	Commence drafting stipulation re bifurcation; review potential lifting of Senator Leno's restriction on his files, email CA re obtaining same from legislative intent service.	2.00	\$ 375.00	\$ 750.00
11/2/2016	Franklin	Two telecons with opposing counsel re drafting and revising stipulation.	0.50	\$ 375.00	\$ 187.50
11/3/2016	Franklin	Telecon with opposing counsel re revising draft stipulation, email same.	0.10	\$ 375.00	\$ 37.50
11/3/2016	Franklin	Email opposing counsel re why Plaintiffs cannot stipulate to staying all discovery pending the resolution of the partial merits briefing (x2), finalize stipulation.	0.70	\$ 375.00	\$ 262.50
11/3/2016	Franklin	Research arguments re why SI Nos. 29 and 30 are relevant to a substantive decision on Plaintiffs' ninth cause of action.	1.30	\$ 375.00	\$ 487.50

Date	Timekeeper	Description	Hours	Rate	Amount
11/3/2016	Michel	Review and analyze 10/24/2016 Ltr. to Judge Kenny re: Disc. Dispute Resolution Options.	0.20	\$ 650.00	\$ 130.00
11/3/2016	Palmerin	Send email to team assigned to case with link to Stipulation and Proposed Order re Merits Hearing stamped "Received" by Court.	0.10	\$ 170.00	\$ 17.00
11/7/2016	Palmerin	Review Order regarding Bifurcation and Motions to Compel hearings. Contact the Court Clerk re ruling on Special Interrogatories Set Three. Email SMF and Defendants' Attorney re Court Clerk's response.	0.40	\$ 170.00	\$ 68.00
11/11/2016	Brady	Analyze strategy with SMF in light of new Attorney General.	0.10	\$ 350.00	\$ 35.00
11/14/2016	Palmerin	Telephone conference with Court Clerk re order on Special Interrogatory number 3. Email SMF and opposing counsel what Court Clerk said.	0.30	\$ 170.00	\$ 51.00
11/22/2016	Palmerin	Telephone conference with Court Clerk re issuing a ruling on Motion to Compel Special Interrogatories, Set Three and email SMF re Clerk's response.	0.20	\$ 170.00	\$ 34.00
11/28/2016	Brady	Conduct correspondence re investigating whether DOJ used APPS to determine someone was prohibited.	0.30	\$ 350.00	\$ 105.00
11/28/2016	Brady	Receipt, review and analyze order re motion to compel discovery answers in preparation to discuss strategy with JRD and SMF.	0.30	\$ 350.00	\$ 105.00
11/28/2016	Brady	Meeting with JRD and SMF to discuss strategy for MSJ in light of ruling on motion to compel discovery responses.	0.50	\$ 350.00	\$ 175.00
11/28/2016	Franklin	Meet with JRD and SAB re strategy in light of recent discovery ruling.	0.50	\$ 375.00	\$ 187.50
11/28/2016	Franklin	Analyze discovery ruling, meet with JRD briefly re same; perform research re same.	0.70	\$ 375.00	\$ 262.50
11/28/2016	Michel	Review and analyze 11/23/2016 Minute Order- Mtn. to Compel Further Resp.'s to SI, Set Three- Court Ruling.	0.50	\$ 650.00	\$ 325.00
11/30/2016	Palmerin	Review Ruling on Plaintiffs' Motion to Compel Special Interrogatories Set 3.	0.50	\$ 170.00	\$ 85.00
12/1/2016	Brady	Conduct correspondence with potential witness to dispute DOJ's contention about APPS spending.	0.50	\$ 350.00	\$ 175.00
12/2/2016	Nunez	Send/receive email to/from Legislative Intent to request Senator Leno's SB819 bill files per SMF.	0.10	\$ 170.00	\$ 17.00
12/2/2016	Nunez	Send/receive email to/from SMF informing him that [REDACTED]	0.10	\$ 170.00	\$ 17.00
12/4/2016	Nunez	Send/receive email to/from Legislative Intent Service informing me that they will look into retrieving Senator Leno's files.	0.20	\$ 170.00	\$ 34.00
12/5/2016	Franklin	Email opposing counsel re noticing PMQ depositions.	0.20	\$ 375.00	\$ 75.00
12/6/2016	Brady	Conduct correspondence with SMF re how to use documents obtained in discovery.	0.20	\$ 350.00	\$ 70.00
12/6/2016	Nunez	Send/receive email to/from SMF re: forwarded copies of Legislative Intent service files for Senator Leno's bills; save in imanager.	0.20	\$ 170.00	\$ 34.00
12/6/2016	Nunez	Send/receive email to/from Jannene from Legislative Intent service; provided all of Senator Leno's files.	0.20	\$ 170.00	\$ 34.00
12/14/2016	Franklin	Analyze documents produced by Legislative Intent Service after Leno's SB 819 file became unrestricted, email re same.	0.60	\$ 375.00	\$ 225.00
12/14/2016	Palmerin	Review document re Legislative Intent Service, Inc. and bookmark each section per SMF.	3.80	\$ 170.00	\$ 646.00
12/20/2016	Franklin	Analyze document in Senator Leno's previously restricted file, compare to documents on previous privilege logs, perform further research re [REDACTED]	0.80	\$ 375.00	\$ 300.00
12/20/2016	Franklin	Commence brainstorming and identifying final list of deponents for depositions regarding 5th and 9th COAs, draft email to opposing counsel re same, meet briefly with SAB re same.	1.30	\$ 375.00	\$ 487.50
12/22/2016	Brady	Analyze SMF's proposed deposition notices and provide feedback and discuss with SMF.	0.40	\$ 350.00	\$ 140.00
12/27/2016	Franklin	Draft memo to file re [REDACTED]	0.60	\$ 375.00	\$ 225.00
12/27/2016	Franklin	Continue drafting separate statement; view legislative hearings re SB 819 in course of preparing separate statement; research argument as to whether [REDACTED]	4.40	\$ 375.00	\$ 1,650.00
12/27/2016	Franklin	Complete PMQ notice for bifurcated issues; commence drafting summary adjudication motion and separate statement.	5.20	\$ 375.00	\$ 1,950.00
1/3/2017	Palmerin	Conduct computer work re search for videos re hearings re Gentry matter per SMF.	0.20	\$ 170.00	\$ 34.00
1/5/2017	Franklin	Telecon with opposing counsel re scheduling depositions and potential protective order motion.	1.00	\$ 375.00	\$ 375.00
1/6/2017	Franklin	Draft and finalize deposition notices, including PMQ notice.	1.50	\$ 375.00	\$ 562.50
1/6/2017	Palmerin	Telephone conference with SMF re sending out three deposition notices.	0.10	\$ 170.00	\$ 17.00
1/6/2017	Palmerin	Review, format, and proofread deposition notices to Devencenzi, Harper, and Person Most Qualified and email to SMF for final review.	1.90	\$ 170.00	\$ 323.00
1/9/2017	Franklin	Research then email opposing counsel re effect of uncodified portion of statute on codified portion.	1.00	\$ 375.00	\$ 375.00
1/9/2017	Franklin	Commence drafting outline of deposition questioning (David Harper)	2.00	\$ 375.00	\$ 750.00
1/11/2017	Franklin	Continue review and analysis of discovery responses as relate to David Harper deposition and creation of outline re same; continue drafting separate statement in support of summary adjudication motion.	4.70	\$ 375.00	\$ 1,762.50
1/13/2017	Franklin	Telecon with opposing counsel re deposition scheduling.	0.10	\$ 375.00	\$ 37.50
1/13/2017	Franklin	Continue drafting Harper Deposition outline and drafting Separate statement of facts.	1.90	\$ 375.00	\$ 712.50
1/16/2017	Franklin	continue drafting Harper deposition outline and separate statement, emails to opposing counsel re deposition scheduling (.2).	4.70	\$ 375.00	\$ 1,762.50
1/23/2017	Franklin	Continue reviewing discovery responses and crafting deposition outline.	3.10	\$ 375.00	\$ 1,162.50
1/24/2017	Franklin	Draft deposition outline for Devencenzi deposition; perform extensive research on legislative privilege.	2.50	\$ 375.00	\$ 937.50
1/24/2017	Palmerin	Revise deposition notices to D. Harper and J. Devencenzi with new deposition date and email drafts to SMF.	0.30	\$ 170.00	\$ 51.00
1/24/2017	Palmerin	Conduct computer work re search for specific documents listed by SMF and all discovery responses from Defendants saved in iManage and add to file with Gentry Deposition Documents saved on my desktop per SMF.	3.20	\$ 170.00	\$ 544.00
1/27/2017	Franklin	Continue drafting Devencenzi deposition outline; researching scope of attorney-client argument/protection.	6.40	\$ 375.00	\$ 2,400.00
1/27/2017	Palmerin	Telephone conference with Esquire Solutions re confirming Court Reporter for deposition on 1/30/17.	0.10	\$ 170.00	\$ 17.00
1/29/2017	Franklin	Revise outlines for Harper and Devencenzi depositions re newly added documents.	2.00	\$ 375.00	\$ 750.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/30/2017	Franklin	Take depositions of David Harper (4.0 hours) and Jessica Devencenzi, including long meeting with opposing counsel re newly raised legislative privilege claims (3.3 hours).	7.30	\$ 375.00	\$ 2,737.50
1/30/2017	Palmerin	Telephone conference with SMF re searching for documents for depositions on iManage. Convert the documents to PDF and email to SMF.	0.10	\$ 170.00	\$ 17.00
1/31/2017	Franklin	Perform extensive research on legislative privilege in response to numerous objections during the Devencenzi deposition.	2.30	\$ 375.00	\$ 862.50
2/1/2017	Brady	Analyze discovery issues with SMF.	0.50	\$ 350.00	\$ 175.00
2/1/2017	Franklin	Email opposing counsel about finalizing PMQ designations and scheduling depositions.	0.10	\$ 375.00	\$ 37.50
2/1/2017	Franklin	Review documents to see if email from Devencenzi and CC'd to London Biggs will be useful as evidence; meet with CBM and JAS re same.	0.50	\$ 375.00	\$ 187.50
2/1/2017	Franklin	Research who can exercise legislative privilege, and whether the privilege is qualified.	0.60	\$ 375.00	\$ 225.00
2/3/2017	Franklin	Complete email to opposing counsel re legislative privilege assertion.	1.80	\$ 375.00	\$ 675.00
2/7/2017	Franklin	Follow up email to opposing counsel re scheduling PMQ deposition.	0.10	\$ 375.00	\$ 37.50
2/8/2017	Palmerin	Draft a continued deposition notice for defendants' person most qualified and give to SMF for his review. Sign proof of service and scan. Email and mail to opposing counsel and profile in iManage.	0.50	\$ 170.00	\$ 85.00
2/10/2017	Palmerin	Receive email from ILG with Deposition Transcripts of D. Harper and J. Devencenzi.	0.10	\$ 170.00	\$ 17.00
2/22/2017	Brady	Receive and review and respond to correspondence re alternative source of evidence that defendant DOJ will not disclose in discovery.	0.10	\$ 350.00	\$ 35.00
2/24/2017	Franklin	draft email to opposing counsel, including stipulation to extend partial MSJ briefing deadlines.	0.80	\$ 375.00	\$ 300.00
3/1/2017	Franklin	Email opposing counsel re resolving instruction not to answer at Devencenzi deposition and follow up with LP.	0.30	\$ 375.00	\$ 112.50
3/1/2017	Franklin	Commence drafting summary of the transcript of David Harper's deposition.	2.30	\$ 375.00	\$ 862.50
3/1/2017	Palmerin	Meeting with SMF re Devencenzi deposition.	0.10	\$ 170.00	\$ 17.00
3/1/2017	Palmerin	Draft second amended notice of deposition of person most qualified. Print for SMF's signature. Serve by mail and email.	0.30	\$ 170.00	\$ 51.00
3/1/2017	Palmerin	Telephone conference with Court Clerk re filing a stipulation and proposed order to continue deadlines and hearing re motion for summary judgment. Place order to file the stipulation and proposed order.	0.40	\$ 170.00	\$ 68.00
3/3/2017	Palmerin	Telephone conference with Court Clerk re clarification needed on filed stipulation re bifurcation and email SMF re same.	0.20	\$ 170.00	\$ 34.00
3/6/2017	Franklin	Email opposing counsel re drafting joint IDC statement.	0.10	\$ 375.00	\$ 37.50
3/6/2017	Palmerin	Telephone conference with SMF re calling Court Clerk re filing a new stipulation and requesting an informal discovery conference. Call Court Clerk re same. Receive and reply to SMF's email re Court Clerk's answers.	0.30	\$ 170.00	\$ 51.00
3/8/2017	Franklin	Draft revised partial MSJ briefing stip and order, email opposing counsel re same.	0.30	\$ 375.00	\$ 112.50
3/15/2017	Franklin	Draft proposed joint statement re IDC request.	2.00	\$ 375.00	\$ 750.00
3/15/2017	Palmerin	Conduct computer work re pull questions that were advised not to be answered from J. Devencenzi deposition transcript and create a new pleading document with all the questions per SMF. Email to SMF.	0.70	\$ 170.00	\$ 119.00
3/17/2017	Brady	Meeting with SMF and JRD re [REDACTED].	0.30	\$ 350.00	\$ 105.00
3/17/2017	Franklin	Draft IDC statement section re privilege claims and instructions not to answer.	4.70	\$ 375.00	\$ 1,762.50
3/21/2017	Michel	Review and analyze Amended Stip. re Bifurcation & Setting Partial Merits Hearing Order.	0.30	\$ 650.00	\$ 195.00
3/22/2017	Palmerin	Review hard copy of conformed stipulation and order re partial merits hearing. Send email to SMF re sticky note from the court on hard copy of stipulation.	0.20	\$ 170.00	\$ 34.00
3/23/2017	Franklin	Email opposing counsel re getting IDC statement filed.	0.10	\$ 375.00	\$ 37.50
3/27/2017	Franklin	Complete deposition summary re David Harper, revise separate statement re same.	2.00	\$ 375.00	\$ 750.00
4/4/2017	Palmerin	Telephone conference with SMF re [REDACTED]. Research [REDACTED] call SMF, and call Court Clerk.	0.80	\$ 170.00	\$ 136.00
4/5/2017	Palmerin	Send email to SMF re available hearing date for motion to compel discovery responses.	0.10	\$ 170.00	\$ 17.00
4/5/2017	Palmerin	Telephone conference with Court Clerk to reserve the 6/2/17 hearing date for motion to compel discovery responses.	0.10	\$ 170.00	\$ 17.00
4/5/2017	Palmerin	Send email to SMF re hearing date set and need to file a notice of hearing with tentative ruling language for the merits hearing.	0.10	\$ 170.00	\$ 17.00
4/5/2017	Palmerin	Telephone conference with Court Clerk re available hearing dates for a motion to compel discovery responses.	0.30	\$ 170.00	\$ 51.00
4/10/2017	Franklin	Email opposing counsel re completing IDC brief.	0.20	\$ 375.00	\$ 75.00
4/11/2017	Brady	Conduct correspondence with SMF re [REDACTED].	0.10	\$ 350.00	\$ 35.00
4/11/2017	Franklin	Email SAB re potential affect of [REDACTED].	0.10	\$ 375.00	\$ 37.50
4/12/2017	Brady	Meeting with SMF re discovery strategy of moving to compel responses; follow up re same.	0.30	\$ 350.00	\$ 105.00
4/21/2017	Franklin	Draft reply for IDC statement.	3.40	\$ 375.00	\$ 1,275.00
4/25/2017	Franklin	Finalize Joint IDC Statement.	0.20	\$ 375.00	\$ 75.00
4/25/2017	Franklin	Revise IDC statement, email opposing counsel re same, telecons with court clerk and opposing counsel's office re same (.4).	0.50	\$ 375.00	\$ 187.50
4/25/2017	Palmerin	Create a cover page for the deposition transcript of J. Devencenzi and a proof of service for the transcript and the joint statement re request for informal discovery conference. Sign proof of service and scan the joint statement, deposition transcript, and proof of service. Save all documents on my desktop and email to Nationwide Legal to be filed at the Sacramento Superior Court.	1.30	\$ 170.00	\$ 221.00
4/27/2017	Franklin	Email opposing counsel re setting Lindley deposition.	0.10	\$ 375.00	\$ 37.50
5/2/2017	Palmerin	Receive and reply to email from SMF re drafting a letter to the Court re the Informal Discovery Conference.	0.10	\$ 170.00	\$ 17.00
5/3/2017	Franklin	Email opposing counsel re possible substitution of PMK.	0.10	\$ 375.00	\$ 37.50
5/3/2017	Palmerin	Draft letter to the Court Clerk re Informal Discovery Conference and email to SMF for his review.	0.90	\$ 170.00	\$ 153.00
5/4/2017	Franklin	Continue drafting partial MSJ and separate statement.	3.10	\$ 375.00	\$ 1,162.50
5/8/2017	Palmerin	Send email to SMF re filing motion to compel discovery responses on 5/10/17.	0.10	\$ 170.00	\$ 17.00
5/10/2017	Franklin	Email opposing counsel (2x) re revising briefing schedule to address delay in taking the Lindley deposition.	0.20	\$ 375.00	\$ 75.00

Date	Timekeeper	Description	Hours	Rate	Amount
5/12/2017	Franklin	Appear at informal discovery conference.	1.20	\$ 375.00	\$ 450.00
5/15/2017	Franklin	Draft stipulation re extending briefing dates.	0.30	\$ 375.00	\$ 112.50
5/15/2017	Franklin	Draft PMK deposition notices re Lindley and meet with HV re same.	0.50	\$ 375.00	\$ 187.50
5/15/2017	Franklin	Commence drafting deposition outline re second session of Devencenzi deposition.	1.40	\$ 375.00	\$ 525.00
5/16/2017	Palmerin	Receive and reply to email from HV re PMQ deposition notice.	0.10	\$ 170.00	\$ 17.00
5/16/2017	Palmerin	Receive and reply to email from SMF re informal discovery conference.	0.20	\$ 170.00	\$ 34.00
5/17/2017	Palmerin	Review, proofread, format, and revise second amended stipulation re bifurcation and partial merits hearing. Convert to PDF and email to SMF.	0.40	\$ 170.00	\$ 68.00
5/17/2017	Palmerin	Receive email from SMF re second amended deposition notice for J. Devencenzi. Draft second amended notice and email to SMF for his review.	0.40	\$ 170.00	\$ 68.00
5/19/2017	Franklin	Continue drafting deposition outline (Lindley).	4.60	\$ 375.00	\$ 1,725.00
5/22/2017	Franklin	Continue reviewing and revising deposition outline and documents for Devencenzi and Lindley depositions.	3.20	\$ 375.00	\$ 1,200.00
5/23/2017	Palmerin	Send email to SMF re filing second amended stipulation re bifurcation and partial merits hearing.	0.10	\$ 170.00	\$ 17.00
5/24/2017	Brady	Telephone conference with SMF re deposition of S. Lindley.	0.30	\$ 350.00	\$ 105.00
5/25/2017	Franklin	Take deposition of Steve Lindley and continued deposition of Jessica Devencenzi. .	4.90	\$ 375.00	\$ 1,837.50
5/30/2017	Brady	Meeting with SMF re debriefing of depositions and how to use certain information learned.	0.50	\$ 350.00	\$ 175.00
5/30/2017	Franklin	Continue drafting partial MSJ and separate statement, meet with JAS re same, telecon with JAS and Irwin Nowick re same.	2.50	\$ 375.00	\$ 937.50
5/31/2017	Franklin	Continue drafting MSA and separate statement.	1.10	\$ 375.00	\$ 412.50
6/1/2017	Brady	Conduct correspondence with SMF re [REDACTED]	0.10	\$ 350.00	\$ 35.00
6/1/2017	Franklin	Analyze impact of [REDACTED]; email SAB re same.	0.40	\$ 375.00	\$ 150.00
6/1/2017	Franklin	Research if [REDACTED] " by Judge Kenny.	0.50	\$ 375.00	\$ 187.50
6/2/2017	Brady	Meeting with SMF re [REDACTED]	0.10	\$ 350.00	\$ 35.00
6/2/2017	Franklin	Review deposition transcripts of Steve Lindley and Jessica Devencenzi, make summaries re same.	0.80	\$ 375.00	\$ 300.00
6/5/2017	Michel	Review and analyze Deposition Transcript of Jessica R. Devencenzi Holmes May 24, 2017 - VOL 2.	0.60	\$ 650.00	\$ 390.00
6/5/2017	Michel	Review and analyze Deposition Transcript of Stephen J. Lindley May 24, 2017.	0.60	\$ 650.00	\$ 390.00
6/6/2017	Franklin	Continue drafting adjudication motion and separate statement.	7.40	\$ 375.00	\$ 2,775.00
6/8/2017	Franklin	Continue drafting adjudication motion and separate statement	7.90	\$ 375.00	\$ 2,962.50
6/8/2017	Palmerin	Telephone conference with Court Clerk re notice of hearing with tentative ruling language. Send email to SMF re same.	0.10	\$ 170.00	\$ 17.00
6/8/2017	Palmerin	Draft notice of hearing plaintiffs' motion for summary adjudication per SMF and send draft to SMF for his review.	0.30	\$ 170.00	\$ 51.00
6/9/2017	Franklin	Continue drafting adjudication motion and separate statement	2.00	\$ 375.00	\$ 750.00
6/11/2017	Brady	Review and revise brief seeking adjudication of two claims in action per court's order.	2.40	\$ 350.00	\$ 840.00
6/11/2017	Franklin	Continue drafting adjudication motion and separate statement	5.60	\$ 375.00	\$ 2,100.00
6/12/2017	Brady	Conduct correspondence with SMF re revisions to merits brief.	0.20	\$ 350.00	\$ 70.00
6/12/2017	Franklin	Continue drafting adjudication motion and separate statement	9.90	\$ 375.00	\$ 3,712.50
6/12/2017	Palmerin	Receive email from SMF re filing motion for adjudication on 6/13/17. Telephone conference with Nationwide Legal re deadline to email documents for filing. Send email to SMF re deadline.	0.20	\$ 170.00	\$ 34.00
6/13/2017	Franklin	finalize brief re 5th and 9th COA.	7.70	\$ 375.00	\$ 2,887.50
6/13/2017	Palmerin	Conduct computer work re transcribe audio of California State Senate, Public Safety Committee on 4/26/11 per SMF.	0.70	\$ 170.00	\$ 119.00
6/13/2017	Palmerin	Conduct computer work re pull all documents cited in the declaration of SMF in support of motion for adjudication. Bates-stamp all the documents and add exhibit tabs. Compile into three PDF documents.	5.40	\$ 170.00	\$ 918.00
6/14/2017	Franklin	Email opposing counsel as to whether matter is really a matter of summary adjudication or a bench trial.	0.10	\$ 375.00	\$ 37.50
6/14/2017	Franklin	Examine research cited in Defendants' opening brief, draft opposition outline.	0.80	\$ 375.00	\$ 300.00
6/14/2017	Franklin	Analyze Defendants' opening brief.	1.00	\$ 375.00	\$ 375.00
6/14/2017	Palmerin	File deposition transcripts of J. Devencenzi and S. Lindley and motion for adjudication documents with original signatures in physical file and organize file.	0.20	\$ 170.00	\$ 34.00
6/15/2017	Michel	Review and analyze Def.'s Ntc. of Mtn. for Summary Adjudication as to the 5th & 9th Causes of Action.	0.80	\$ 650.00	\$ 520.00
6/15/2017	Palmerin	Receive email from ILG re defendants' motion for summary adjudication and supporting documents.	0.10	\$ 170.00	\$ 17.00
6/16/2017	Palmerin	Receive and reply to email from SMF re using defendant's separate statement as a template for our separate statement.	0.10	\$ 170.00	\$ 17.00
6/21/2017	Franklin	Commence drafting opposition to Defendants' MSA.	4.80	\$ 375.00	\$ 1,800.00
6/23/2017	Franklin	Continue drafting opposition.	6.60	\$ 375.00	\$ 2,475.00
6/24/2017	Franklin	Continue drafting opposition.	2.00	\$ 375.00	\$ 750.00
6/26/2017	Franklin	Draft response to separate statement.	0.60	\$ 375.00	\$ 225.00
6/26/2017	Palmerin	Receive and reply to email from SMF re Gentry caption.	0.10	\$ 170.00	\$ 17.00
6/27/2017	Franklin	Continue drafting opposition.	1.40	\$ 375.00	\$ 525.00
6/28/2017	Franklin	Revise opposition to Defendants' MSA.	1.50	\$ 375.00	\$ 562.50
6/28/2017	Palmerin	Meet with SMF re filing opposition and related documents on Friday.	0.10	\$ 170.00	\$ 17.00
6/29/2017	Franklin	Revise Opposition to Defendants' MSA per comments of AMB; finalize citations and sources re same	7.30	\$ 375.00	\$ 2,737.50
6/29/2017	Palmerin	Receive and reply to email from SMF re preparing template of response to defendant's separate statement.	0.10	\$ 170.00	\$ 17.00
6/29/2017	Palmerin	Send email to opposing counsel re Word version of defendants' separate statement.	0.10	\$ 170.00	\$ 17.00
6/29/2017	Palmerin	Draft plaintiffs' response to defendants' separate statement and send to SMF for his review.	0.90	\$ 170.00	\$ 153.00
6/30/2017	Franklin	Finalize MSA Opposition and related documents.	3.80	\$ 375.00	\$ 1,425.00
6/30/2017	Palmerin	Assemble opposition to defendants' motion for summary adjudication and accompanying documents and create FedEx shipping label to be sent via overnight delivery to opposing counsel. Send email to opposing counsel with documents attached.	0.30	\$ 170.00	\$ 51.00

Date	Timekeeper	Description	Hours	Rate	Amount
6/30/2017	Palmerin	Revise opposition to defendants' motion for summary adjudication, the separate statement, and the declaration of SMF per SMF's further revisions. Print signature pages for SMF's signature and sign proofs of service. Scan signature pages and attach to final PDF documents. Save documents on my desktop for filing.	1.10	\$ 170.00	\$ 187.00
7/2/2017	Franklin	Analyze Defendants' opposition to Plaintiffs' motion for adjudication, outline reply and perform research re same.	0.70	\$ 375.00	\$ 262.50
7/2/2017	Franklin	Draft discovery in response to Defendants' opposition to Plaintiffs separate statement.	6.90	\$ 375.00	\$ 2,587.50
7/5/2017	Michel	Review and analyze Decl. of Anthony R. Haki ISO Opp. to Mtn. for Adjudication.	0.30	\$ 650.00	\$ 195.00
7/5/2017	Michel	Review and analyze Opp. to Plft's Mtn. for Adjudication of the Fifth & Ninth Causes of Action.	0.40	\$ 650.00	\$ 260.00
7/5/2017	Michel	Review and analyze Def's Resp. to Plft's Separate Statement.	0.70	\$ 650.00	\$ 455.00
7/5/2017	Palmerin	Receive email from ILG re defendants' opposition to plaintiffs' motion for adjudication.	0.10	\$ 170.00	\$ 17.00
7/7/2017	Franklin	Continue drafting Reply.	4.10	\$ 375.00	\$ 1,537.50
7/10/2017	Franklin	Continue drafting reply.	4.70	\$ 375.00	\$ 1,762.50
7/10/2017	Palmerin	Receive and reply to email from SMF re electronic service.	0.10	\$ 170.00	\$ 17.00
7/14/2017	Franklin	Complete first draft of reply.	4.50	\$ 375.00	\$ 1,687.50
7/19/2017	Franklin	Revise Reply ISO Motion per comments of AMB, work on ancillary documents re same.	3.50	\$ 375.00	\$ 1,312.50
7/19/2017	Palmerin	Receive and reply to email from SMF re filing reply to opposition to motion for summary adjudication.	0.10	\$ 170.00	\$ 17.00
7/20/2017	Franklin	Analyze reply.	1.00	\$ 375.00	\$ 375.00
7/20/2017	Palmerin	Telephone conference with SMF re draft of reply to defendants' opposition to motion for adjudication.	0.10	\$ 170.00	\$ 17.00
7/21/2017	Palmerin	Receive email from opposing counsel with courtesy copies of defendants' reply to motion for summary adjudication.	0.10	\$ 170.00	\$ 17.00
7/21/2017	Palmerin	Revise reply to opposition to motion for adjudication per SMF's revisions. Print, scan, and send back to SMF for review.	0.40	\$ 170.00	\$ 68.00
7/24/2017	Michel	Review and analyze Defs' Response to Pltfs' Additional Material Facts.	0.20	\$ 650.00	\$ 130.00
7/24/2017	Michel	Review and analyze Reply ISO Defs' Motion for Summary Adjudication.	0.90	\$ 650.00	\$ 585.00
7/31/2017	Franklin	Email opposing counsel in response to request that most recent set of discovery be withdrawn.	0.50	\$ 375.00	\$ 187.50
8/2/2017	Franklin	Review discovery responses and email opposing counsel re same.	0.30	\$ 375.00	\$ 112.50
8/2/2017	Franklin	Email LP re preparing binders for hearing.	0.60	\$ 375.00	\$ 225.00
8/2/2017	Franklin	Appear at trial on fifth and ninth causes of action.	1.30	\$ 375.00	\$ 487.50
8/2/2017	Franklin	Draft hearing onesheet and outline responses to issues raised in Defendants' reply.	2.50	\$ 375.00	\$ 937.50
8/2/2017	Palmerin	Send email to SMF [REDACTED]	0.10	\$ 170.00	\$ 17.00
8/2/2017	Palmerin	Receive emails from opposing counsel and SMF re defendant's responses to special interrogatories set five and requests for admissions set four.	0.10	\$ 170.00	\$ 17.00
8/2/2017	Palmerin	Receive and reply to email from SMF re [REDACTED]	0.10	\$ 170.00	\$ 17.00
8/2/2017	Palmerin	Conduct computer work re check all deposition transcripts for any signature pages and errata pages. Send email to SMF re none found.	0.40	\$ 170.00	\$ 68.00
8/2/2017	Palmerin	Conduct computer work re check the Sacramento Superior Court's website re tentative rulings, court reporters, and appearances at hearings via CourtCall. Add important notes to my notepad. Send email to SMF re appearing via CourtCall. Receive email from SMF re appearing in person.	0.90	\$ 170.00	\$ 153.00
8/3/2017	Brady	Receipt, review and analyze and conduct related correspondence with SMF.	0.30	\$ 350.00	\$ 105.00
8/3/2017	Palmerin	Telephone conference with Court Clerk re court reporter for hearing re motion for adjudication. Send email to SMF re same.	0.20	\$ 170.00	\$ 34.00
8/3/2017	Palmerin	Receive email from CEC re tentative ruling re motion for adjudication. Review tentative.	0.30	\$ 170.00	\$ 51.00
8/4/2017	Palmerin	Receive and reply to email from SMF re giving notice to opposing counsel re appearing at hearing.	0.10	\$ 170.00	\$ 17.00
8/4/2017	Palmerin	Receive and reply to email from SMF re hearing on motion for adjudication.	0.10	\$ 170.00	\$ 17.00
8/7/2017	Michel	Review and analyze Becerra and Lindley discovery reports.	0.70	\$ 650.00	\$ 455.00
8/9/2017	Palmerin	Telephone conference with SMF re [REDACTED] motion for summary adjudication	0.10	\$ 170.00	\$ 17.00
8/9/2017	Palmerin	Send email to SMF re order re hearing re motion for adjudication [REDACTED]	0.10	\$ 170.00	\$ 17.00
8/10/2017	Brady	Receipt, review and analyze opinion from court granting Plaintiffs' motion for adjudication and overseeing preparation of alert re victory and conducting related correspondence.	0.70	\$ 350.00	\$ 245.00
8/10/2017	Palmerin	Receive and reply to email from SAB re [REDACTED] motions for adjudication [REDACTED]	0.10	\$ 170.00	\$ 17.00
8/11/2017	Brady	Analyze strategy for proceeding in light of favorable ruling with SMF.	0.20	\$ 350.00	\$ 70.00
8/11/2017	Franklin	Post MSA ruling strategy discussion with SAB.	0.20	\$ 375.00	\$ 75.00
8/11/2017	Palmerin	Receive email from ILG with endorsed copy of ruling re motions for adjudication.	0.10	\$ 170.00	\$ 17.00
8/14/2017	Franklin	Draft summary post MSA ruling determination re: status of case and specific discovery issues	2.80	\$ 375.00	\$ 1,050.00
8/15/2017	Palmerin	Draft summary of ruling re motions for adjudication to be sent to plaintiffs. Send to SMF and SAB for review.	0.70	\$ 170.00	\$ 119.00
8/18/2017	Palmerin	Receive and reply to email from SAB re [REDACTED] motions for adjudication.	0.10	\$ 170.00	\$ 17.00
8/18/2017	Palmerin	Receive and reply to email from D. Gentry re [REDACTED]	0.10	\$ 170.00	\$ 17.00
8/19/2017	Franklin	Status telecon with opposing counsel re post-ruling issues.	0.60	\$ 375.00	\$ 225.00
8/21/2017	Palmerin	Receive email from M. Midlam re [REDACTED] Forward email to SAB and SMF.	0.10	\$ 170.00	\$ 17.00
8/23/2017	Palmerin	Meet with SMF re [REDACTED]	0.10	\$ 170.00	\$ 17.00
8/23/2017	Palmerin	Telephone conference with Court Clerk re whether Judge wants a formal status conference or an informal in-chambers meeting with attorneys. Meet with SMF re Court Clerk to ask Judge.	0.20	\$ 170.00	\$ 34.00
8/24/2017	Palmerin	Send email to SMF re [REDACTED] motions for adjudication.	0.10	\$ 170.00	\$ 17.00
8/28/2017	Palmerin	Telephone conference with Court Clerk re scheduling an informal status conference for 9/8/17. Send email to SMF re conference at 10 AM. Call the Court Clerk to confirm the conference for 9/8/17 at 10 AM.	0.20	\$ 170.00	\$ 34.00
8/29/2017	Palmerin	Send email to A. Haki and SMF re informal status conference date and time.	0.10	\$ 170.00	\$ 17.00

Date	Timekeeper	Description	Hours	Rate	Amount
9/4/2017	Franklin	Draft meet-and-confer letter of 9.11.17.	5.00	\$ 375.00	\$ 1,875.00
9/8/2017	Franklin	Attend telephonic informal status conference.	0.80	\$ 375.00	\$ 300.00
9/8/2017	Palmerin	Receive and reply to email from SMF re discovery motion deadlines and trial date.	0.10	\$ 170.00	\$ 17.00
9/13/2017	Franklin	Email opposing counsel re his request that the parties reschedule a pending discovery response deadline	0.60	\$ 375.00	\$ 225.00
9/13/2017	Franklin	Email opposing counsel re rescheduling discovery response deadlines and hearing dates; meet with JRD re same (.1).	0.90	\$ 375.00	\$ 337.50
9/20/2017	Palmerin	File ruling re motions for adjudication, notice of change of opposing counsel's telephone number, and letter from S. Kimbrough in physical file.	0.10	\$ 170.00	\$ 17.00
9/28/2017	Palmerin	Receive email from SMF re current briefing schedule re motions to compel. Check calendar and send email to SMF with briefing schedule.	0.20	\$ 170.00	\$ 34.00
10/4/2017	Franklin	Commence drafting notes in preparation for meet-and-confer re Defendants' responses to SI (Set 4) and RFA (Set 3).	1.00	\$ 375.00	\$ 375.00
10/4/2017	Palmerin	Receive email from HV re deposition summaries of transcripts of S. Lindley, J. Devencenzi, and D. Harper. Search iManage for summaries. Reply to email re S. Lindley and D. Harper done and ask BAB, AK, or IK to respond when they have free time to prepare summary for J. Devencenzi.	0.30	\$ 170.00	\$ 51.00
10/5/2017	Franklin	Continue drafting notes in preparation for meet-and-confer re Defendants' responses to SI (Set 4) and RFA (Set 3).	1.90	\$ 375.00	\$ 712.50
10/5/2017	Palmerin	Review discovery responses emailed by opposing counsel. Send email to SMF re [REDACTED] 7.	0.30	\$ 170.00	\$ 51.00
10/6/2017	Franklin	Attend telephonic meet-and-confer re Defendants' responses to SI (Set 4) and RFA (Set 3).	0.90	\$ 375.00	\$ 337.50
10/7/2017	Franklin	Draft follow-up email to opposing counsel re meet-and-confer re Defendants' responses to SI (Set 4) and RFA (Set 3).	1.00	\$ 375.00	\$ 375.00
10/10/2017	Franklin	Commence drafting MTC re Defendants' responses to RFA (Set Three).	1.80	\$ 375.00	\$ 675.00
10/10/2017	Michel	Receipt, review and analyze 2017-10-05 Defendants' Becerra & Lindley's Responses to RFA-3.	0.60	\$ 650.00	\$ 390.00
10/10/2017	Michel	Receipt, review and analyze 2017-10-06 Documents in Responsive to Defendants' Rsp. to POD-4.	0.70	\$ 650.00	\$ 455.00
10/10/2017	Michel	Receipt, review and analyze 2017-10-05 Defendants' Becerra & Lindley's Responses to SI-4.	0.80	\$ 650.00	\$ 520.00
10/10/2017	Michel	Receipt, review and analyze 2017-10-05 Defendants' Becerra & Lindley's Responses to FI-4.	0.90	\$ 650.00	\$ 585.00
10/10/2017	Michel	Receipt, review and analyze Defendants' Becerra & Lindley's Responses to POD-4.	1.00	\$ 650.00	\$ 650.00
10/11/2017	Franklin	Commence drafting MTC re Defendants' responses to SI (Set Four).	1.50	\$ 375.00	\$ 562.50
10/11/2017	Franklin	Complete drafting MTC re Defendants' responses to RFA (Set Three).	5.10	\$ 375.00	\$ 1,912.50
10/11/2017	Palmerin	Draft notices of motions to compel request for admissions and special interrogatories and send to SMF for review.	0.70	\$ 170.00	\$ 119.00
10/11/2017	Palmerin	Draft separate statements in support of motions to compel request for admissions and special interrogatories and send to SMF for review.	2.90	\$ 170.00	\$ 493.00
10/12/2017	Franklin	Complete drafting MTC re Defendants' responses to SI (Set Four).	2.70	\$ 375.00	\$ 1,012.50
10/12/2017	Franklin	Revise and finalize MTC re Defendants' responses to SI (Set Four) and RFA (Set Three), draft declarations and separate statements re same.	4.20	\$ 375.00	\$ 1,575.00
10/12/2017	Palmerin	Prepare declarations of SMF in support of motions to compel and attach exhibits to declarations.	0.30	\$ 170.00	\$ 51.00
10/12/2017	Palmerin	Conduct computer work re format motion to compel requests for admissions, create table of contents and table of authorities, attach SMF's signature, print proof of service, sign, scan, and attach to final version of PDF. Save on my desktop for filing.	1.80	\$ 170.00	\$ 306.00
10/13/2017	Michel	Exchange emails with SMF and with JRD re motion to compel further document production and request for sanctions, and meeting with JRD re handling of same.	0.60	\$ 650.00	\$ 390.00
10/13/2017	Palmerin	Receive and reply to emails from SMF re filing additional documents re motions to compel today.	0.10	\$ 170.00	\$ 17.00
10/13/2017	Palmerin	Draft notice of errata re plaintiffs' notices of motions to compel request for admissions and special interrogatories. Draft amended notices. Send all documents to SMF for review.	0.80	\$ 170.00	\$ 136.00
10/13/2017	Palmerin	Assemble notice of errata re motions to compel responses to request for admissions and special interrogatories, declarations of SMF, proposed orders, and amended notices. Print proofs of service, sign, scan, and attach them to the corresponding document. Send to Nationwide Legal to file. Serve all documents by email and mail.	1.30	\$ 170.00	\$ 221.00
10/16/2017	Palmerin	Receive and reply to email from AK re deposition summaries.	0.10	\$ 170.00	\$ 17.00
10/16/2017	Palmerin	Review responses to discovery served by defendant and determine which responses we already filed a motion to compel for. Send email to SMF re calendaring deadline to file motions to compel responses to form interrogatories, set four, and requests for production of documents, set four.	0.20	\$ 170.00	\$ 34.00
10/20/2017	Franklin	Draft stipulation re setting merits briefing schedule and other issues (.4), email opposing counsel re same (.1).	0.50	\$ 375.00	\$ 187.50
10/23/2017	Franklin	Commence drafting Reply ISO Discovery motions.	5.50	\$ 375.00	\$ 2,062.50
10/24/2017	Franklin	Continue drafting Reply ISO Discovery motions.	7.90	\$ 375.00	\$ 2,962.50
10/25/2017	Franklin	Complete drafting Reply ISO Discovery motions.	4.50	\$ 375.00	\$ 1,687.50
10/25/2017	Michel	Receipt, review and analyze 2017-10-23 Defendants' Opp to Plaintiffs' MTC RFA-3 & SI-4.	1.20	\$ 650.00	\$ 780.00
10/25/2017	Palmerin	Receive email from ILG re served opposition to plaintiffs' motions to compel. Review opposition.	0.20	\$ 170.00	\$ 34.00
10/26/2017	Palmerin	Receive and reply to email from SMF re [REDACTED] motions to compel request for admissions set 3 and special interrogatories set 4 and drafting a supplemental declaration.	0.10	\$ 170.00	\$ 17.00
10/26/2017	Palmerin	Draft supplemental declaration of SMF in support of reply. Search for exhibits cited to and convert them into one PDF with exhibit tabs. Send drafts of reply, declaration, and exhibits to SMF for review.	1.90	\$ 170.00	\$ 323.00
10/27/2017	Palmerin	File discovery responses of defendants in hard file.	0.10	\$ 170.00	\$ 17.00
10/31/2017	Franklin	Email opposing counsel re determining how the DOJ will comply with the Court's ruling on the ninth cause of action and follow up re other topics.	0.30	\$ 375.00	\$ 112.50
10/31/2017	Franklin	Prepare for motion to compel hearing.	0.90	\$ 375.00	\$ 337.50
11/2/2017	Franklin	Review tentative and prepare for hearing on discovery motions.	1.00	\$ 375.00	\$ 375.00
11/2/2017	Palmerin	Telephone conference with A. Hakl re SMF appearing at hearing re motions to compel tomorrow.	0.10	\$ 170.00	\$ 17.00
11/2/2017	Palmerin	Telephone conference with court clerk re SMF appearing at hearing re motions to compel tomorrow and requesting court reporter.	0.10	\$ 170.00	\$ 17.00
11/2/2017	Palmerin	Send email to SMF and HV re [REDACTED]	0.20	\$ 170.00	\$ 34.00

Date	Timekeeper	Description	Hours	Rate	Amount
11/2/2017	Palmerin	Review tentative ruling re hearing re motions to compel request for admissions set 3 and special interrogatories set 4.	0.50	\$ 170.00	\$ 85.00
11/3/2017	Franklin	Appear at hearing on discovery motions.	0.50	\$ 375.00	\$ 187.50
11/3/2017	Franklin	Email opposing counsel in follow up re hearing on discovery motions.	0.50	\$ 375.00	\$ 187.50
11/6/2017	Brady	Exchange emails with SMF and CDM re analysis of discovery ruling.	0.20	\$ 350.00	\$ 70.00
11/6/2017	Franklin	Email SAB and CDM re analysis of discovery ruling.	0.10	\$ 375.00	\$ 37.50
11/6/2017	Michel	Exchange emails with SMF and SAB re analysis of discovery ruling; review moving documents re same	1.50	\$ 650.00	\$ 975.00
11/6/2017	Palmerin	Receive email from ILG re court's ruling re motions to compel. Send email to ILG re document already profiled.	0.10	\$ 170.00	\$ 17.00
11/6/2017	Palmerin	Review ruling re motions to compel requests for admissions and special interrogatories.	0.30	\$ 170.00	\$ 51.00
11/7/2017	Brady	Analyze draft discovery interrogatories and provide feedback to SMF to finalize.	0.30	\$ 350.00	\$ 105.00
11/7/2017	Franklin	Draft eight interrogatories as allowed by the Court order of November 3, 2017.	1.50	\$ 375.00	\$ 562.50
11/7/2017	Palmerin	Telephone conference with Gaby from Jeffrey Bohn's law firm re filing a writ of mandamus.	0.10	\$ 170.00	\$ 17.00
11/8/2017	Palmerin	Receive and review email from Nationwide Legal re minute order re hearing re motions to compel.	0.10	\$ 170.00	\$ 17.00
11/9/2017	Brady	Conduct correspondence with SMF re draft discovery to propound.	0.20	\$ 350.00	\$ 70.00
11/9/2017	Franklin	Revise eight interrogatories as allowed by the Court order of November 3, 2017.	0.80	\$ 375.00	\$ 300.00
11/10/2017	Brady	Review and sign special interrogatories to be served on defendants.	0.70	\$ 350.00	\$ 245.00
11/10/2017	Palmerin	Prepare special interrogatories to be served on defendants. Print, proofread, give to SAB for signature, and sign proof of service. Scan and profile in iManage. Serve on defendants by mail and email.	0.90	\$ 170.00	\$ 153.00
12/3/2017	Franklin	Draft correspondence to opposing counsel (meet-and-confer and other matters).	1.50	\$ 375.00	\$ 562.50
12/4/2017	Franklin	Revise correspondence to opposing counsel (meet-and-confer and other matters).	0.50	\$ 375.00	\$ 187.50
12/4/2017	Palmerin	Telephone conference with court clerk re setting informal discovery conference. Send email to SMF re same.	0.20	\$ 170.00	\$ 34.00
12/4/2017	Palmerin	Proofread draft of meet and confer letter from SMF to opposing counsel and revise formatting of draft of stipulation re merits briefing schedule. Print both and email and mail to opposing counsel.	0.80	\$ 170.00	\$ 136.00
12/5/2017	Palmerin	Telephone conference with court clerk re setting an informal discovery conference. Send email to SMF re same.	0.10	\$ 170.00	\$ 17.00
12/7/2017	Franklin	Telephone conference with opposing counsel re current discovery dispute and related matters.	0.50	\$ 375.00	\$ 187.50
12/7/2017	Palmerin	Receive emails from ILG re discovery responses from defendants.	0.10	\$ 170.00	\$ 17.00
12/7/2017	Palmerin	Telephone conference with court clerk to change the informal discovery conference time per SMF. Send confirming email to SMF.	0.20	\$ 170.00	\$ 34.00
12/13/2017	Franklin	Draft letter to court re upcoming informal discovery conference.	3.60	\$ 375.00	\$ 1,350.00
12/13/2017	Palmerin	Telephone conference with Court Clerk re letter to Judge re informal discovery conference. Send email to SMF re same.	0.20	\$ 170.00	\$ 34.00
12/13/2017	Palmerin	Conduct computer work re proofread letter to Judge re informal discovery conference. Finalize and send to Judge via overnight delivery. Send by email to opposing counsel.	0.90	\$ 170.00	\$ 153.00
12/14/2017	Franklin	Prepare for upcoming informal discovery conference.	0.40	\$ 375.00	\$ 150.00
12/20/2017	Franklin	Prepare for telephonic informal discovery conference.	0.50	\$ 375.00	\$ 187.50
12/20/2017	Franklin	Participate in telephonic informal discovery conference.	0.50	\$ 375.00	\$ 187.50
12/20/2017	Palmerin	Receive and reply to email from SMF re informal discovery conference. Send email to A. Hakl re same.	0.10	\$ 170.00	\$ 17.00
12/20/2017	Palmerin	Telephone conference with court clerk to confirm informal discovery conference. Send email to SMF re same.	0.20	\$ 170.00	\$ 34.00
12/20/2017	Palmerin	Listen to voicemail from SMF re transcript for hearing re motions to compel on 11/3/17. Send email to SMF re transcript not delivered yet.	0.20	\$ 170.00	\$ 34.00
12/21/2017	Franklin	Commence drafting opening trial brief.	2.80	\$ 375.00	\$ 1,050.00
1/4/2018	Palmerin	Send follow up email to court reporter re transcript for hearing on 11/3/17.	0.10	\$ 170.00	\$ 17.00
1/8/2018	Palmerin	Send follow up email to B. Ryan re transcript for hearing on 11/3/17.	0.10	\$ 170.00	\$ 17.00
1/9/2018	Palmerin	Receive email from SMF re opening brief deadlines.	0.10	\$ 170.00	\$ 17.00
1/9/2018	Palmerin	Send email to SMF re status of transcript for hearing on 11/3/17. Send follow up email to B. Ryan re same.	0.20	\$ 170.00	\$ 34.00
1/10/2018	Palmerin	Conduct research re [REDACTED] Send email to SMF re [REDACTED] opening brief [REDACTED]	0.80	\$ 170.00	\$ 136.00
1/16/2018	Franklin	Continue drafting opening brief.	2.80	\$ 375.00	\$ 1,050.00
1/16/2018	Palmerin	Conduct computer work re review SMF's email re documents produced by AG. Send email to SMF re same.	0.40	\$ 170.00	\$ 68.00
1/17/2018	Franklin	Review and revise pie charts to be used as exhibit for opening brief.	0.50	\$ 375.00	\$ 187.50
1/17/2018	Franklin	Continue drafting opening brief.	2.40	\$ 375.00	\$ 900.00
1/17/2018	Palmerin	Conduct computer work re create a spreadsheet with pie charts re DROS Special Fund and send to SMF.	2.30	\$ 170.00	\$ 391.00
1/18/2018	Franklin	Continue drafting opening brief.	3.80	\$ 375.00	\$ 1,425.00
1/19/2018	Franklin	Continue drafting opening brief.	3.30	\$ 375.00	\$ 1,237.50
1/20/2018	Franklin	Continue drafting opening brief.	3.00	\$ 375.00	\$ 1,125.00
1/21/2018	Franklin	Continue drafting opening brief.	3.70	\$ 375.00	\$ 1,387.50
1/22/2018	Franklin	Status meeting with CDM, JRD, and JDM re briefing merits of the case.	0.30	\$ 375.00	\$ 112.50
1/22/2018	Franklin	Continue drafting opening brief.	1.50	\$ 375.00	\$ 562.50
1/23/2018	Franklin	Continue drafting opening merits brief.	1.70	\$ 375.00	\$ 637.50
1/23/2018	Palmerin	Telephone conference with JDM re case status.	0.10	\$ 170.00	\$ 17.00
1/24/2018	Franklin	Continue drafting opening merits brief.	1.50	\$ 375.00	\$ 562.50
1/24/2018	Palmerin	Telephone conference with court clerk re merits hearing still on calendar for March 16. Send email to SMF re same.	0.20	\$ 170.00	\$ 34.00
1/25/2018	Franklin	Continue drafting opening merits brief.	2.30	\$ 375.00	\$ 862.50
1/25/2018	Palmerin	Draft notice of merits trial and send to SMF for his review.	0.20	\$ 170.00	\$ 34.00
1/26/2018	Franklin	Continue drafting opening merits brief.	2.20	\$ 375.00	\$ 825.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/26/2018	Palmerin	Send email to SMF re [REDACTED] discovery [REDACTED]	0.10	\$ 170.00	\$ 17.00
1/27/2018	Franklin	Continue drafting opening merits brief.	6.90	\$ 375.00	\$ 2,587.50
1/28/2018	Brady	Review and revise draft trial brief and provide feedback to SMF.	1.80	\$ 350.00	\$ 630.00
1/28/2018	Franklin	Continue drafting opening brief.	2.30	\$ 375.00	\$ 862.50
1/29/2018	Brady	Analyze revisions to draft trial brief and provide additional feedback and discuss with SMF.	1.00	\$ 350.00	\$ 350.00
1/29/2018	Franklin	Continue drafting opening brief.	8.00	\$ 375.00	\$ 3,000.00
1/29/2018	Palmerin	Revise formatting of declaration of SMF re opening brief. Pull exhibits to the declaration, add exhibit tabs, and highlight language cited to.	3.40	\$ 170.00	\$ 578.00
1/30/2018	Brady	Review and revise final draft of trial brief and provide feedback to SMF.	2.80	\$ 350.00	\$ 980.00
1/30/2018	Franklin	Finalize opening merits brief; research potential due process argument.	3.40	\$ 375.00	\$ 1,275.00
1/30/2018	Palmerin	Finish preparing the exhibits to the declaration of SMF re opening brief by adding exhibit tabs and highlighting language cited to. Finalize draft of SMF declaration and send both documents to SMF for review.	1.30	\$ 170.00	\$ 221.00
2/20/2018	Franklin	Analyze Defendants' opposition.	1.00	\$ 375.00	\$ 375.00
2/21/2018	Brady	Receive and review and respond to correspondence from SMF re opposing DOJ's res judicata argument after reviewing file for relevant documents.	0.80	\$ 350.00	\$ 280.00
2/21/2018	Franklin	Research [REDACTED] commence drafting reply.	5.30	\$ 375.00	\$ 1,987.50
2/22/2018	Franklin	Continue drafting reply.	5.20	\$ 375.00	\$ 1,950.00
2/23/2018	Franklin	Continue drafting reply.	3.90	\$ 375.00	\$ 1,462.50
2/24/2018	Franklin	Continue drafting reply.	2.20	\$ 375.00	\$ 825.00
2/25/2018	Franklin	Continue drafting reply.	2.70	\$ 375.00	\$ 1,012.50
2/26/2018	Franklin	Continue drafting reply.	3.40	\$ 375.00	\$ 1,275.00
2/27/2018	Brady	Review and revise draft of the reply to the opposition to our opening brief and provide feedback to SMF.	1.10	\$ 350.00	\$ 385.00
2/27/2018	Franklin	Continue drafting reply.	6.10	\$ 375.00	\$ 2,287.50
2/28/2018	Brady	Review and revise draft of the reply to the opposition to our opening brief and provide feedback to SMF.	2.40	\$ 350.00	\$ 840.00
2/28/2018	Franklin	Continue drafting reply.	5.40	\$ 375.00	\$ 2,025.00
2/28/2018	Palmerin	Receive email from JDM re reply to the opposition to opening brief due tomorrow. Send email to SMF and SAB re same.	0.10	\$ 170.00	\$ 17.00
3/1/2018	Franklin	Research support for proposition that [REDACTED]	0.30	\$ 375.00	\$ 112.50
3/1/2018	Franklin	Final review and revisions to Reply ISO Opening Brief.	1.70	\$ 375.00	\$ 637.50
3/1/2018	Michel	Review and analyze defendant's opposition to opening brief and declaration of A. Hakl with exhibits.	1.00	\$ 650.00	\$ 650.00
3/12/2018	Palmerin	Send email to SMF re binder for hearing on Friday re merits trial.	0.10	\$ 170.00	\$ 17.00
3/13/2018	Franklin	Email opposing counsel re need for letter re DOJ proving it is not spending DROS money on APPS.	0.10	\$ 375.00	\$ 37.50
3/13/2018	Michel	Review and analyze opening brief re merits trial.	1.00	\$ 650.00	\$ 650.00
3/13/2018	Michel	Review and analyze reply brief re merits trial.	1.00	\$ 650.00	\$ 650.00
3/13/2018	Palmerin	Send follow up email to SMF re rulings to be included in the hearing binder for the merits trial.	0.10	\$ 170.00	\$ 17.00
3/14/2018	Franklin	Prepare for trial hearing.	1.10	\$ 375.00	\$ 412.50
3/15/2018	Palmerin	Telephone conference with JDM re filing a motion to amend the pleadings and scheduling a hearing date. Receive email from JDM re same.	0.10	\$ 170.00	\$ 17.00
3/26/2018	Franklin	Emails and telecons re rescheduling merits hearing and scheduling motion for leave to amend.	0.30	\$ 375.00	\$ 112.50
3/26/2018	Palmerin	Draft notice of plaintiffs' motion to file second amended complaint and send to SMF for review. Calendar deadlines to file motion, opposition, reply, and hearing re plaintiffs' motion to file second amended complaint.	0.60	\$ 170.00	\$ 102.00
3/27/2018	Franklin	Commence drafting motion for leave to amend.	2.10	\$ 375.00	\$ 787.50
3/27/2018	Palmerin	Revise notice of motion to file second amended complaint per new hearing date and send to SMF for review. Update calendared motion to file second amended complaint hearing date and filing deadlines.	0.30	\$ 170.00	\$ 51.00
4/16/2018	Franklin	Teleconference with opposing counsel re DOJ's failure to provide proof that it is complying with Judge Kenny's Order re Plaintiffs' Ninth Cause of Action and other matters.	0.30	\$ 375.00	\$ 112.50
4/20/2018	Franklin	Follow up email to opposing counsel.	0.10	\$ 375.00	\$ 37.50
4/23/2018	Franklin	Draft PRAR re DOJ's supposed implementation of ninth cause of action ruling.	1.10	\$ 375.00	\$ 412.50
4/23/2018	Palmerin	Update PRAR tracking database with new PRAR re non-APPS enforcement funding.	0.10	\$ 170.00	\$ 17.00
5/8/2018	Palmerin	Review and update PRAR tracking database with letter from DOJ requesting for an extension to respond to PRAR re non-APPS enforcement funding.	0.10	\$ 170.00	\$ 17.00
5/22/2018	Palmerin	Review and update PRAR tracking database with response to PRAR re non-APPS enforcement funding.	0.10	\$ 170.00	\$ 17.00
5/23/2018	Franklin	Telecon with CDM and JRD re status of matter.	0.10	\$ 375.00	\$ 37.50
5/23/2018	Michel	Telephone conference with JRD and SMF re current status and arguments on upcoming hearing.	0.10	\$ 650.00	\$ 65.00
5/27/2018	Franklin	Continue drafting motion for leave to amend.	1.80	\$ 375.00	\$ 675.00
5/29/2018	Brady	Review and revise draft amended complaint adding two causes of action and provide SMF feedback on issues to address.	1.50	\$ 350.00	\$ 525.00
5/29/2018	Franklin	Telephone conference with MMI re [REDACTED] research.	0.20	\$ 375.00	\$ 75.00
5/29/2018	Franklin	Finalize proposed second amended complaint.	0.70	\$ 375.00	\$ 262.50
5/30/2018	Franklin	Email MMI re finalizing leave motion.	0.20	\$ 375.00	\$ 75.00
5/30/2018	Michel	Telephone conference with JRD and SMF re strategy.	0.10	\$ 650.00	\$ 65.00
5/30/2018	Palmerin	Receive and reply to email from SMF re filing a motion for leave to file a second amended complaint.	0.10	\$ 170.00	\$ 17.00
5/30/2018	Palmerin	Conduct computer work re pull exhibits to be cited in SMF's declaration in support of motion for leave to file a second amended complaint and save on my desktop. Send to SMF for his review.	0.60	\$ 170.00	\$ 102.00
5/31/2018	Brady	Review and revise updated draft of amended complaint and discuss proposed edits with SMF.	1.80	\$ 350.00	\$ 630.00
5/31/2018	Franklin	Final review and revision of documents to be filed re leave motion.	3.50	\$ 375.00	\$ 1,312.50

Date	Timekeeper	Description	Hours	Rate	Amount
5/31/2018	Palmerin	Conduct computer work re proofread, review, and format notice and motion for leave to file a second amended complaint, declaration of SMF, proposed order for filing, and proposed second amended complaint. Save final PDFs on my desktop and send to SMF for review. Make revisions to motion per SMF and save final PDF on my desktop.	2.50	\$ 170.00	\$ 425.00
6/11/2018	Franklin	Continue drafting reply ISO Motion for leave.	4.90	\$ 375.00	\$ 1,837.50
6/13/2018	Brady	Analyze SMF's draft of reply to opposition to motion to file a second amended complaint and provide feedback to SMF for further revisions.	2.30	\$ 350.00	\$ 805.00
6/13/2018	Franklin	Continue drafting Reply ISO Motion for Leave.	5.60	\$ 375.00	\$ 2,100.00
6/14/2018	Brady	Review and revise final draft of reply to DOJ's opposition to our seeking to file an amended complaint; and conduct related correspondence with SMF re same.	2.30	\$ 350.00	\$ 805.00
6/14/2018	Franklin	Review SAB's comments re Reply ISO Motion for leave, revise re same.	5.00	\$ 375.00	\$ 1,875.00
6/15/2018	Franklin	Draft supplemental Declaration ISO Motion.	0.20	\$ 375.00	\$ 75.00
6/15/2018	Franklin	Further revision of Reply ISO Motion for Leave; final review of same; emails with LP and JDM re filing and service.	3.70	\$ 375.00	\$ 1,387.50
6/15/2018	Palmerin	Conduct computer work re proofread supplemental declaration of SMF in support of reply to opposition to file a second amended complaint. Compile exhibits and attach to final PDF of declaration. Send final PDF to SMF for review.	0.60	\$ 170.00	\$ 102.00
6/15/2018	Palmerin	Conduct computer work re make a list of defendants' amended discovery responses and send to SMF.	0.70	\$ 170.00	\$ 119.00
6/21/2018	Brady	Receive and review and respond to correspondence from SMF re responding to tentative ruling denying motion for leave to amend complaint.	0.30	\$ 350.00	\$ 105.00
6/21/2018	Palmerin	Telephone conference with A. Haki re appearing at hearing tomorrow re Motion to File a Second Amended Complaint. Telephone conference with SMF re same. Call and leave voicemail for Court re same. Telephone conference with clerk to confirm oral argument and a court reporter.	0.20	\$ 170.00	\$ 34.00
6/22/2018	Brady	Receive and review and respond to correspondence re court's ruling on amending complaint and provide feedback re potential next steps.	0.20	\$ 350.00	\$ 70.00
6/22/2018	Franklin	Appear at Leave Motion hearing, including approximately .2 travel time and .5 preparation..	1.20	\$ 375.00	\$ 450.00
6/25/2018	Brady	Meeting with SMF re strategy for proceeding in light of court disallowing addition of claims.	0.40	\$ 350.00	\$ 140.00
6/25/2018	Franklin	Email to CDM re meeting with SAB re deciding if it makes sense to [REDACTED]	0.10	\$ 375.00	\$ 37.50
6/25/2018	Franklin	Meet with SAB re deciding if it makes sense to [REDACTED]	0.40	\$ 375.00	\$ 150.00
6/25/2018	Michel	Exchange emails with SMF re [REDACTED]	0.10	\$ 650.00	\$ 65.00
6/27/2018	Brady	Telephone conference with SMF and CDM re strategy for case in light of denial of leave to file an amended complaint.	0.20	\$ 350.00	\$ 70.00
6/27/2018	Franklin	Status conference call with CDM, AMB, and SAB.	0.20	\$ 375.00	\$ 75.00
6/27/2018	Michel	Status conference call with AMB, SMF, and SAB.	0.20	\$ 650.00	\$ 130.00
6/27/2018	Michel	Telephone conference with SMF and SAB re strategy for case in light of denial of leave to file an amended complaint.	0.20	\$ 650.00	\$ 130.00
6/28/2018	Brady	Conduct correspondence with SMF re strategy for [REDACTED] amended complaint.	0.10	\$ 350.00	\$ 35.00
7/12/2018	Brady	Receipt, review and analyze Public Records Act request response from DOJ re [REDACTED] and conduct related correspondence re thoughts with CDM and SMF.	0.30	\$ 350.00	\$ 105.00
7/12/2018	Palmerin	Review and update PRAR tracking database with responsive documents from DOJ re PRAR re non-APPS enforcement funding.	0.10	\$ 170.00	\$ 17.00
8/8/2018	Palmerin	Conduct computer work re search iManage for an order re deadlines to file supplemental briefs re new causes of action. Check court's docket re same. Send email to SMF re deadlines. Remove deadlines from calendar per SMF.	0.30	\$ 170.00	\$ 51.00
8/20/2018	Palmerin	Telephone conference with court clerk and SMF re merits trial on Friday.	0.10	\$ 170.00	\$ 17.00
8/23/2018	Franklin	Email opposing counsel re explaining why the court should not have taken trial off calendar and why I was going to appear in court at the time the trial was set for.	0.30	\$ 375.00	\$ 112.50
8/23/2018	Palmerin	Telephone conference with SMF re merits trial hearing tomorrow and message for AAF. Send email to AAF with message.	0.10	\$ 170.00	\$ 17.00
8/24/2018	Franklin	Appear for hearing; meet with court reporter and make several calls re potential for filing a declaration at 1:30.	0.70	\$ 375.00	\$ 262.50
8/24/2018	Palmerin	Exchange emails with SMF re tentative ruling, order, and transcript for hearing on 6/22/18.	0.20	\$ 170.00	\$ 34.00
8/27/2018	Brady	Receive and review and respond to correspondence re court's decision to take trial date off calendar; and conduct follow up correspondence re same.	0.20	\$ 350.00	\$ 70.00
8/27/2018	Franklin	Email JRD re explaining the error upon which the court took the merits hearing off calendar.	1.10	\$ 375.00	\$ 412.50
8/27/2018	Palmerin	Review email from SMF re canceled hearing on 8/24/18.	0.10	\$ 170.00	\$ 17.00
8/27/2018	Palmerin	Exchange emails with SMF and CEC re court reporter from hearing on 6/22/18 on vacation until Wednesday. Send email to ILG and HV re order re hearing on 8/24/18.	0.20	\$ 170.00	\$ 34.00
8/28/2018	Brady	Telephone conference with SMF and team re [REDACTED]	0.50	\$ 350.00	\$ 175.00
8/28/2018	Brady	Meeting with LP to discuss contacting court re resetting trial date; meeting with PYO re preparing ex parte papers; analyze PYO's research findings and respond thereto with additional research to perform; and receive and review correspondence from SMF re communications with opposing counsel re our ex parte application.	0.80	\$ 350.00	\$ 280.00
8/28/2018	Franklin	Email to opposing counsel re the Court's error in taking the trial off calendar.	0.20	\$ 375.00	\$ 75.00
8/28/2018	Franklin	Follow up emails to Sean and JRD re email to JRD re explaining [REDACTED] research re same.	0.30	\$ 375.00	\$ 112.50
8/28/2018	Palmerin	Telephone conference with SMF re canceled merits trial date on 8/24/18. Leave voicemail for court clerk re same.	0.20	\$ 170.00	\$ 34.00
8/28/2018	Palmerin	Conduct research re ex parte rules in Sacramento Superior Court. Send information to SAB and SMF.	0.30	\$ 170.00	\$ 51.00

Date	Timekeeper	Description	Hours	Rate	Amount
8/29/2018	Brady	Meeting with AMB re rules for stipulating to extend five-years-to-trial rule; discuss also litigation strategy in light of same; exchange emails re same.	0.30	\$ 350.00	\$ 105.00
8/29/2018	Brady	Analyze order from court taking trial date off calendar and strategy for responding thereto in light of potential 5-year statute approaching; conduct related legal research and direct PYO to investigate further; and conduct related correspondence with team.	1.40	\$ 350.00	\$ 490.00
8/30/2018	Brady	Oversee compliance with court order re setting new trial date, discuss strategy for doing so with SMF, and delegate tasks to team accordingly; and conduct correspondence with SMF and opposing counsel re same.	0.80	\$ 350.00	\$ 280.00
8/31/2018	Franklin	Follow up email to opposing counsel re five-year issue.	0.20	\$ 375.00	\$ 75.00
9/4/2018	Brady	Exchange emails with SMF re email to opposing counsel re apparent joint statement error and email in response to his status email re deposition scheduling and other matters.	0.20	\$ 350.00	\$ 70.00
9/4/2018	Franklin	Send follow up email to SAB re [REDACTED]	0.20	\$ 375.00	\$ 75.00
9/4/2018	Franklin	Email SAB new strategy [REDACTED]	0.50	\$ 375.00	\$ 187.50
9/5/2018	Brady	Exchange emails with SMF re potential arguments for [REDACTED]	0.10	\$ 350.00	\$ 35.00
9/6/2018	Brady	Conduct correspondence re issues with resetting the trial date.	0.20	\$ 350.00	\$ 70.00
9/6/2018	Franklin	Draft email to opposing counsel re options related to five-year stipulation, email SAB for approval re sending same.	0.60	\$ 375.00	\$ 225.00
9/6/2018	Franklin	Draft letter to clerk of court re rescheduling trial, email SAB re same.	0.70	\$ 375.00	\$ 262.50
9/6/2018	Michel	Analyze transcript of June 22, 2018, in furtherance of determining addressing trial setting issue, and exchange emails with JRD and SAB re same.	0.20	\$ 650.00	\$ 130.00
9/6/2018	Palmerin	Telephone conference with SMF re contacting clerk re merits trial hearing.	0.10	\$ 170.00	\$ 17.00
9/7/2018	Brady	Meeting with JRD re further strategy on [REDACTED]	0.10	\$ 350.00	\$ 35.00
9/7/2018	Brady	Receive and review and respond to correspondence from SMF re strategy [REDACTED]; review and revise letter to court laying out our position; and discuss with LP next steps.	1.40	\$ 350.00	\$ 490.00
9/7/2018	Palmerin	Telephone conference with SMF re contacting court reporter re new merits trial hearing date.	0.10	\$ 170.00	\$ 17.00
9/10/2018	Brady	Analyze article re recent bill responding to appellate decision in a similar case about misusing fees and instruct PYO to conduct additional research re such to determine if any impact on this case.	0.20	\$ 350.00	\$ 70.00
9/10/2018	Brady	Conduct correspondence with SMF and opposing counsel re seeking a new trial date from court.	0.30	\$ 350.00	\$ 105.00
9/10/2018	Franklin	Email CDM re strategy as to whether to seek trial priority.	0.10	\$ 375.00	\$ 37.50
9/10/2018	Palmerin	Conduct computer work re proofread letter prepared by SMF to the clerk re setting merits trial hearing date. Convert to PDF and save on my desktop. Send by email to attorney service for personal delivery to the court clerk and send to A. Hakl. Receive stamped delivered letter from attorney service, profile in iManage, and send confirming email to SMF and SAB.	0.40	\$ 170.00	\$ 68.00
9/11/2018	Brady	Receive and review and respond to correspondence re setting new trial date.	0.10	\$ 350.00	\$ 35.00
9/11/2018	Brady	Meetings with JRD re strategy on [REDACTED]	0.20	\$ 350.00	\$ 70.00
9/13/2018	Brady	Meeting with PYO re analysis of [REDACTED]	0.10	\$ 350.00	\$ 35.00
9/20/2018	Brady	Exchange emails with SMF re [REDACTED]	0.10	\$ 350.00	\$ 35.00
9/28/2018	Brady	Oversee confirmation of opposing counsel's stipulation to extend 5-year deadline and conduct related correspondence.	0.10	\$ 350.00	\$ 35.00
9/28/2018	Palmerin	Exchange emails with SMF re stipulation to extend the 5 year trial deadline.	0.10	\$ 170.00	\$ 17.00
10/1/2018	Palmerin	Send emails to SMF re filing the stipulation to extend our trial deadline.	0.10	\$ 170.00	\$ 17.00
10/16/2018	Brady	Meeting with SMF and LP re revising trial briefs per court's order.	0.10	\$ 350.00	\$ 35.00
10/19/2018	Palmerin	Send email to SAB re telephone conference with SMF re re-filing the trial brief. Add task to SAB's task list.	0.10	\$ 170.00	\$ 17.00
10/31/2018	Brady	Analyze trial brief and order to revise it to remove causes of action not before the court anymore; and conduct related correspondence with SMF re such.	1.80	\$ 350.00	\$ 630.00
11/14/2018	Palmerin	Exchange emails with SAB re reminder to review draft of reply brief re Merits Trial.	0.10	\$ 170.00	\$ 17.00
11/20/2018	Brady	Analyze briefing to remove reference to claims court refused to allow plaintiffs to include to be refiled clean per court's order; conduct related correspondence with LP and SMF.	0.80	\$ 350.00	\$ 280.00
11/20/2018	Franklin	Exchange correspondence with SAB re [REDACTED]	0.10	\$ 375.00	\$ 37.50
11/20/2018	Palmerin	Exchange correspondence with SAB re [REDACTED]	0.10	\$ 170.00	\$ 17.00
12/4/2018	Franklin	Review and revise opening trial brief.	1.90	\$ 375.00	\$ 712.50
12/4/2018	Michel	Case Management re case strategy and briefing.	0.70	\$ 650.00	\$ 455.00
12/26/2018	Brady	Review and analyze 2018-12-24 Dec of A. Hakl ISO Defendants' Opp Trial Brief.	0.50	\$ 350.00	\$ 175.00
12/26/2018	Michel	Review and analyze 2018-12-24 Dec of A. Hakl ISO Defendants' Opp Trial Brief.	0.20	\$ 650.00	\$ 130.00
12/26/2018	Palmerin	Review email from ILG with Declaration of A. Hakl in Support of Defendants' Opposition Trial Brief. Move document to correct folder and re-name.	0.10	\$ 170.00	\$ 17.00
12/27/2018	Brady	Exchange emails with CDM and team re revising and filing reply trial brief.	0.20	\$ 350.00	\$ 70.00
12/27/2018	Michel	Exchange emails with SAB re revising and filing reply trial brief.	0.20	\$ 650.00	\$ 130.00
12/28/2018	Palmerin	Conduct computer work re attempt to do PDF compare of Defendants' previously filed Opposition Trial Brief and Defendants' new Opposition Trial Brief. Attempt to copy PDF language to Word document. Print each document and skim side by side, highlight differences in new document and send to SMF and SAB.	2.70	\$ 170.00	\$ 459.00
1/3/2019	Franklin	Pre-trial strategy telecon with JRD and SAB.	0.90	\$ 375.00	\$ 337.50
1/3/2019	Franklin	Review and revise updated reply ISO trial brief.	1.30	\$ 375.00	\$ 487.50
1/3/2019	Franklin	Revise trial hearing outline.	2.00	\$ 375.00	\$ 750.00
1/3/2019	Palmerin	Exchange emails with SMF re filing reply to Defendants' Opposition Trial Brief.	0.10	\$ 170.00	\$ 17.00

Date	Timekeeper	Description	Hours	Rate	Amount
1/7/2019	Palmerin	Exchange emails with SMF, SAB, and JRD to set up a meeting or telephone conference re Merits Trial.	0.10	\$ 170.00	\$ 17.00
1/7/2019	Palmerin	Prepare binder for Merits Trial Hearing for SMF.	1.30	\$ 170.00	\$ 221.00
1/8/2019	Brady	Receive and review correspondence re status of case and provide input re trial preparation.	0.20	\$ 350.00	\$ 70.00
1/8/2019	Palmerin	Telephone conference with Court Clerk to confirm Merits Trial on 1/18/19. Send email to SMF re same.	0.10	\$ 170.00	\$ 17.00
1/8/2019	Palmerin	Assemble Merits Trial hearing binder to be delivered to SMF.	0.20	\$ 170.00	\$ 34.00
1/10/2019	Brady	Telephone conference with SMF and JRD re trial preparation and preparation for the call by reviewing briefing.	1.00	\$ 350.00	\$ 350.00
1/11/2019	Franklin	Preparation of summary of discovery responses for use during hearing.	3.50	\$ 375.00	\$ 1,312.50
1/11/2019	Palmerin	Telephone conference with court clerk re changing the time for the Merits Trial hearing from 11 a.m. to 10 a.m. Exchange emails with SMF re same. Call court clerk to confirm 10 a.m. start time.	0.20	\$ 170.00	\$ 34.00
1/14/2019	Franklin	Draft opening statement.	0.90	\$ 375.00	\$ 337.50
1/15/2019	Brady	Meet with MMI re research [REDACTED]	0.20	\$ 350.00	\$ 70.00
1/15/2019	Brady	Analyze issues raised by SMF in preparation for oral argument and assign related tasks to clerks; conduct related research; analyze Bauer briefing to advise SMF on how to address; and draft notes for SMF.	2.00	\$ 350.00	\$ 700.00
1/15/2019	Franklin	Preparation for trial hearing and mock hearing; outline defense to Defnedant's attempt to utilize Bauer, including review of Intermediate Scrutiny case law.	2.00	\$ 375.00	\$ 750.00
1/15/2019	Palmerin	Send email to JRD, SAB, and AMB with merits trial briefing.	0.10	\$ 170.00	\$ 17.00
1/16/2019	Brady	Meeting with JRD and SMF re additional potential issues to address at hearing on trial.	0.20	\$ 350.00	\$ 70.00
1/16/2019	Brady	Preparation for bench trial by mootng SMF.	2.00	\$ 350.00	\$ 700.00
1/16/2019	Franklin	Research recent case law re [REDACTED] for trial; review [REDACTED] meet with SAB re preparing for trial. .	1.70	\$ 375.00	\$ 637.50
1/16/2019	Franklin	Mock argument.	1.70	\$ 375.00	\$ 637.50
1/17/2019	Brady	Receipt, review and analyze tentative ruling and discuss with SMF and JRD.	0.60	\$ 350.00	\$ 210.00
1/17/2019	Franklin	Review tentative ruling and prepare for trial hearing.	2.00	\$ 375.00	\$ 750.00
1/17/2019	Michel	Receipt, review and analyze tentative ruling; discuss same with team.	0.50	\$ 650.00	\$ 325.00
1/18/2019	Brady	Conduct correspondence with SMF re details of writ hearing and next steps.	0.10	\$ 350.00	\$ 35.00
1/18/2019	Michel	Exchange emails with JRD re outcome of oral argument.	0.10	\$ 650.00	\$ 65.00
1/21/2019	Brady	Telephone conference with SMF and JRD re [REDACTED]; and follow up correspondence with staff re [REDACTED]	1.00	\$ 350.00	\$ 350.00
1/21/2019	Franklin	Post-hearing de-briefing with JRD and SAB.	0.90	\$ 375.00	\$ 337.50
1/22/2019	Barvir	Meeting with SAB re attorneys fees motion; discuss [REDACTED] discuss [REDACTED] search for and send SAB copy of fee breakdown summary used in other matters.	0.50	\$ 475.00	\$ 237.50
1/22/2019	Brady	Preparation for discussion with AMB re [REDACTED] attorneys' fee motion.	0.20	\$ 350.00	\$ 70.00
1/22/2019	Brady	Meeting with AAF and JRD re further handling of fee motion.	0.30	\$ 350.00	\$ 105.00
1/22/2019	Brady	Meeting with AMB re p [REDACTED] attorneys' fees [REDACTED]	0.50	\$ 350.00	\$ 175.00
1/22/2019	Frank	Meeting with SAB and JRD re further handling of fee motion.	0.30	\$ 350.00	\$ 105.00
1/31/2019	Palmerin	Exchange emails with SAB, HV, and LPB re meeting re billing and attorneys' fees. Calendar meeting.	0.20	\$ 170.00	\$ 34.00
2/4/2019	Palmerin	Meeting with SAB and HV re organizing billing for motion for attorneys' fees.	0.60	\$ 170.00	\$ 102.00
2/26/2019	Palmerin	Send email to HV with list of discovery requests and responses, depositions, filed motions, and merits trial briefing date ranges for billing project per SAB.	1.10	\$ 170.00	\$ 187.00
3/4/2019	Palmerin	Meet with SAB re ruling on Petition for Writ of Mandate. Conduct computer work re check docket for ruling. Call clerk re same. Exchange emails with SMF, SAB, JRD, and CDM re ruling still not available and trying back tomorrow.	0.20	\$ 170.00	\$ 34.00
3/5/2019	Brady	Exchange emails with JRD re [REDACTED] meeting with JRD re [REDACTED] appeal.	0.30	\$ 350.00	\$ 105.00
3/5/2019	Brady	Receipt, review and analyze decision denying issuance of writ of mandate and discuss next steps with team.	0.60	\$ 350.00	\$ 210.00
3/5/2019	Michel	Review and analyze court's ruling on writ; multiple emails and telephone conferences re case strategy.	1.50	\$ 650.00	\$ 975.00
3/8/2019	Brady	Analyze strategy re judgment; conduct related correspondence and research.	0.60	\$ 350.00	\$ 210.00
3/8/2019	Franklin	Draft proposed order and judgment, research re same.	1.00	\$ 375.00	\$ 375.00
3/11/2019	Brady	Review and revise SMF's analysis of appellate prospects and conduct related correspondence.	0.30	\$ 350.00	\$ 105.00
3/11/2019	Brady	Telephone conference with SAB and SMF re finalizing order on writ and judgment to facilitate appeal.	0.80	\$ 350.00	\$ 280.00
3/11/2019	Brady	Telephone conference with AMB and SMF re finalizing order on writ and judgment to facilitate appeal.	0.80	\$ 350.00	\$ 280.00
3/18/2019	Franklin	Complete memo analyzing judgement in this action, draft shorter client memo.	3.10	\$ 375.00	\$ 1,162.50
3/18/2019	Palmerin	Review California Rules of Court re submitting proposed orders and proposed judgments after a final ruling. Send email to SMF re opposing counsel's deadline to approve proposed order and proposed judgment. Review email from opposing counsel re proposed documents. Send Word version of proposed order saved in iManage to SMF; calendar new deadline to submit proposed order and proposed judgment to the Court and send confirming email to SMF.	0.50	\$ 170.00	\$ 85.00
3/26/2019	Brady	Review opposing counsel's objections to proposed judgment and discuss amendments thereto with SMF; conduct correspondence with team re appeal; and revise draft of recommendation to client re appeal..	0.70	\$ 350.00	\$ 245.00
3/27/2019	Brady	Exchange emails with SMF re finalizing judgment and other case management issues re appeal.	0.10	\$ 350.00	\$ 35.00
4/3/2019	Brady	Receipt, review and analyze proposed order on writ and judgment and instruct LP to submit to court; conduct related correspondence.	0.20	\$ 350.00	\$ 70.00
4/5/2019	Barvir	Conduct legal research re deadlines for timing of fee motion; send findings to SAB and SMF.	0.40	\$ 475.00	\$ 190.00

Date	Timekeeper	Description	Hours	Rate	Amount
4/5/2019	Brady	Exchange emails with SMF and AMB re strategy on seeking attorneys fee motion.	0.10	\$ 350.00	\$ 35.00
4/22/2019	Franklin	Draft stipulation to extend deadline to file motion for attorney's fees and cost memo.	1.00	\$ 375.00	\$ 375.00
4/24/2019	Brady	Receipt, review and analyze stipulation to extend deadline to file attorneys' fee motion following appeal; and provide SMF feedback re same.	0.20	\$ 350.00	\$ 70.00
4/24/2019	Franklin	Research deadline for filing cost memo and related rules for stipulating extension thereof.	0.30	\$ 375.00	\$ 112.50
5/16/2019	Palmerin	Review emails from SMF and opposing counsel, A. Haki, re filing stipulation to extend the deadline to file a motion for attorneys' fees and costs. Review final Stipulation, print, add signatures, and scan. Send to Nationwide Legal for filing. Assemble Stipulation to Extend the Deadline to File a Motion for Attorneys' Fees and Costs and serve by mail and email to opposing counsel, A. Haki. Profile same.	0.90	\$ 170.00	\$ 153.00
5/11/2021	Barvir	Exchange emails with LP re status of issuance of remittitur and deadline to file fee motion.	0.20	\$ 475.00	\$ 95.00
5/11/2021	Barvir	Exchange emails with SAB re discussing strategy for seeking attorneys' fees.	0.20	\$ 475.00	\$ 95.00
5/11/2021	Brady	Exchange emails with AMB re discussing strategy for seeking attorneys' fees.	0.20	\$ 350.00	\$ 70.00
5/13/2021	Barvir	Meeting with SAB re analyzing strategy for filing of motion to seek attorney's fees.	0.70	\$ 475.00	\$ 332.50
5/13/2021	Barvir	Meeting with SAB via videoconference re litigation status and strategy; discuss outcome [REDACTED] AMB to review [REDACTED] to determine [REDACTED]	1.30	\$ 475.00	\$ 617.50
5/13/2021	Brady	Meeting with AMB re analyzing strategy for filing of motion to seek attorney's fees.	1.30	\$ 350.00	\$ 455.00
5/13/2021	Brady	Preparation of materials for AMB to consider in evaluating [REDACTED]	1.80	\$ 350.00	\$ 630.00
5/27/2021	Barvir	Receipt, review and analyze SAB email including links to case filings in trial court and court of appeal; begin to review SAB's notes and portions of those case filings to begin to assess [REDACTED]	2.60	\$ 475.00	\$ 1,235.00
5/27/2021	Brady	Exchange emails with HV re [REDACTED] attorneys' fee motion. Meeting re same.	0.50	\$ 350.00	\$ 175.00
6/3/2021	Barvir	Exchange multiple emails with SAB re [REDACTED] fee motion [REDACTED] pull and review remittitur and 2019 stipulation extending deadline to file fee motion pending appeal; send emails to SAB [REDACTED]	0.30	\$ 475.00	\$ 142.50
6/3/2021	Brady	Conduct correspondence with AMB re [REDACTED] attorneys' fees.	0.30	\$ 350.00	\$ 105.00
6/8/2021	Barvir	Exchange multiple emails with SAB and HV re potential motion for attorneys' fees and [REDACTED] also discuss [REDACTED]	0.20	\$ 475.00	\$ 95.00
6/8/2021	Barvir	Receipt, review and analyze trial and appellate record, including positive ruling on Causes of Action 5 and 9 (11 pages), subsequent ruling reining in that victory (20 pages), portions of Appellants' Opening Brief (10 pages), complaint (28 pages), portions of Respondents' Brief (3 pages), and legislative history of AB 1669, to determine [REDACTED] draft attorney's notes re same [REDACTED] motion for fees.	2.90	\$ 475.00	\$ 1,377.50
6/8/2021	Barvir	Begin to draft memorandum re [REDACTED] motion for attorneys fees / draft motion for attorneys' fees; conduct legal research re [REDACTED]	3.60	\$ 475.00	\$ 1,710.00
6/8/2021	Brady	Instruct HV on pulling together billing for preparing an attorneys' fees settlement offer; conduct correspondence with AMB re [REDACTED]	0.60	\$ 350.00	\$ 210.00
6/8/2021	Frank	Investigate the availability of authorities [REDACTED] I researched that, found the authority, and drafted some brief ready content.	2.00	\$ 350.00	\$ 700.00
6/9/2021	Barvir	Continue to draft memorandum re likelihood of succeeding on merits of motion for attorneys fees \ draft motion for attorneys' fees; conduct legal research re [REDACTED]	12.40	\$ 475.00	\$ 5,890.00
6/9/2021	Brady	Conduct correspondence with AMB and CDM re details of settlement offer to make for attorneys' fees.	0.30	\$ 350.00	\$ 105.00
6/10/2021	Barvir	Correspondence with SAB re recoverable cost to file in motion.	0.20	\$ 475.00	\$ 95.00
6/10/2021	Barvir	Correspondence with SAB re recoverable costs to seek in motion.	0.30	\$ 475.00	\$ 142.50
6/10/2021	Brady	Analyze AMB's memorandum re viability of fee motion; draft notes re [REDACTED]; conduct related correspondence with staff re [REDACTED] and instruct LP to [REDACTED]	3.00	\$ 350.00	\$ 1,050.00
6/11/2021	Brady	Analyze settlement offer and conduct related correspondence with team.	2.00	\$ 350.00	\$ 700.00
6/11/2021	Palmerin	Exchange emails with SAB re deadline to file motion for attorneys' fees.	0.10	\$ 170.00	\$ 17.00
6/11/2021	Palmerin	Calculate recoverable costs and send to AMB and SAB with form to be used to claim costs.	0.30	\$ 170.00	\$ 51.00
6/14/2021	Brady	Draft final correspondence re settlement offer for attorneys' fees to opposing counsel; oversee finalization of related materials with LP.	0.70	\$ 350.00	\$ 245.00
7/1/2021	Barvir	Conduct correspondence with SAB regarding preparing attorneys' fee motion.	0.10	\$ 475.00	\$ 47.50
7/2/2021	Brady	Exchange emails with opposing counsel R. Hanley re stipulating to extension for attorneys' fee motion deadline; and emails with AMB and LP re impact on timeline for related tasks and strategy.	0.30	\$ 350.00	\$ 105.00
7/6/2021	Palmerin	Exchange emails with SAB and AMB re [REDACTED] motion for attorneys' fees.	0.10	\$ 170.00	\$ 17.00

Date	Timekeeper	Description	Hours	Rate	Amount
7/6/2021	Palmerin	Review Joint Stipulation and Proposed Order to extend deadline to file motion for attorneys' fees revised by opposing counsel, revise formatting, convert to pdf, and send back to opposing counsel for signature.	0.30	\$ 170.00	\$ 51.00
7/6/2021	Palmerin	Draft Joint Stipulation and Proposed Order to extend deadline to file motion for attorneys' fees and send to SAB for review.	0.60	\$ 170.00	\$ 102.00
7/7/2021	Brady	Exchange emails with AMB and LP re status of stipulation to extend deadline to file attorneys' fee motion.	0.10	\$ 350.00	\$ 35.00
7/8/2021	Palmerin	Review docket to see if Order to extend deadline to file Motion for Attorneys' Fees has been issued. Meet with SAB re same.	0.20	\$ 170.00	\$ 34.00
7/9/2021	Brady	Conduct correspondence with LP and AMB re status of Joint Stipulation and Proposed Order to extend deadline to file Motion for Attorneys' Fees.	0.30	\$ 350.00	\$ 105.00
7/9/2021	Palmerin	Call Sacramento Superior Court re status of Joint Stipulation and Proposed Order to extend deadline to file Motion for Attorneys' Fees. Exchange emails with AMB and SAB re same. Research California Rules of Court re extending deadline to file Motion for Attorneys' Fees and pending stipulations. Telephone conference with SAB re same.	0.40	\$ 170.00	\$ 68.00
7/12/2021	Palmerin	Telephone conference with SAB re status of obtaining hearing date for Ex Parte to Extend Deadline to File Motion for Attorney's Fees.	0.10	\$ 170.00	\$ 17.00
7/12/2021	Palmerin	Exchange emails with KTM re filing Ex Parte to Extend Deadline to File Motion for Attorney's Fees.	0.10	\$ 170.00	\$ 17.00
7/12/2021	Palmerin	Review case docket to see if Judge has signed Joint Stipulation and Proposed Order to Extend Deadline to File Motion for Attorney's Fees. Exchange emails with SAB and AMB re Order not issued and reserving hearing date for ex parte to extend deadline.	0.20	\$ 170.00	\$ 34.00
7/12/2021	Palmerin	Telephone conference with Court Clerk to check status of Joint Stipulation and Proposed Order to Extend Deadline to File Motion for Attorney's Fees. Leave voicemail for Department Clerk re reserving ex parte hearing to continue deadline.	0.50	\$ 170.00	\$ 85.00
7/12/2021	Palmerin	Draft Notice of Ex Parte to Extend Deadline to File Motion for Attorney's Fees, Memorandum of Points and Authorities, Declaration of SAB, and Proposed Order and send to SAB for review.	1.40	\$ 170.00	\$ 238.00
7/13/2021	Palmerin	Check docket to see if Judge signed off on Joint Stipulation and Proposed Order to Extend Deadline to File Motion for Attorney's Fees.	0.10	\$ 170.00	\$ 17.00
7/14/2021	Palmerin	Check docket to see if Court has issued Order extending deadline to file motion for attorney's fees. Download Order from Lexis, profile, and send to SAB, AMB, and CDM.	0.20	\$ 170.00	\$ 34.00
7/14/2021	Palmerin	Prepare Proof of Service for Order extending deadline to file motion for attorney's fees, add signature, convert to pdf, attach to Order, and serve on opposing counsel by email.	0.40	\$ 170.00	\$ 68.00
8/3/2021	Brady	Telephone conference with AMB re strategy [REDACTED]	0.30	\$ 350.00	\$ 105.00
8/4/2021	Palmerin	Check timelines for Motion for Summary Adjudication re 5th and 9th Causes of Action, Bench Trial re remaining Causes of Action, and post Judgment phase, and exchange emails with HV, SAB, and AMB re same.	0.40	\$ 170.00	\$ 68.00
8/5/2021	Palmerin	Exchange emails with HV re [REDACTED] r attorneys fee motion.	0.10	\$ 170.00	\$ 17.00
8/9/2021	Palmerin	Exchange emails with HV re [REDACTED] re motion for attorney's fees.	0.10	\$ 170.00	\$ 17.00
8/9/2021	Palmerin	Telephone conference with HV re [REDACTED] motion for attorney's fees.	0.10	\$ 170.00	\$ 17.00
8/9/2021	Palmerin	Meet with HV re [REDACTED] motion for attorney's fees.	0.20	\$ 170.00	\$ 34.00
8/11/2021	Palmerin	Send email reminder to SAB and AMB re following up with opposing counsel re settlement of attorney's fees and costs.	0.10	\$ 170.00	\$ 17.00
8/12/2021	Brady	Draft correspondence to opposing counsel re extending deadline to file attorneys' fee motion to continue settlement negotiations.	0.30	\$ 350.00	\$ 105.00
8/13/2021	Brady	Prepare stipulation to extend deadline to file attorneys' fees to allow for settlement negotiations.	0.30	\$ 350.00	\$ 105.00
8/13/2021	Palmerin	Review and revise Joint Stipulation and Proposed Order to Extend Deadline to File Motion for Attorneys' Fees and send to SAB and AMB to send to opposing counsel.	0.20	\$ 170.00	\$ 34.00
8/13/2021	Palmerin	Draft Joint Stipulation and Proposed Order to Extend Deadline to File Motion for Attorneys' Fees and send to SAB and AMB.	0.30	\$ 170.00	\$ 51.00
8/18/2021	Brady	Exchange emails with LP re Joint Stipulation and Proposed Order to Extend Deadline to File Motion for Attorneys' Fees delivered to the Court for filing.	0.10	\$ 350.00	\$ 35.00
8/23/2021	Palmerin	Check docket to see if Judge has signed Proposed Order to Extend Deadline to File Motion for Attorney's Fees.	0.20	\$ 170.00	\$ 34.00
8/26/2021	Palmerin	Prepare Proof of Service for Order re Extension to File Motion for Attorney's Fees, add signature, and attach to Order. Serve on opposing counsel by email.	0.20	\$ 170.00	\$ 34.00
8/27/2021	Brady	Draft correspondence to opposing counsel re status of settlement talks.	0.50	\$ 350.00	\$ 175.00
9/3/2021	Brady	Case Management re settlement offer and potential attorneys' fee motion.	0.10	\$ 350.00	\$ 35.00
9/20/2021	Palmerin	Exchange emails with SAB and AMB re following up with opposing counsel on settlement offer.	0.10	\$ 170.00	\$ 17.00
9/28/2021	Palmerin	Exchange emails with AMB re billing phases.	0.10	\$ 170.00	\$ 17.00
10/4/2021	Frank	Begin process of converting memorandum about fee motion into memorandum of points and authorities.	2.00	\$ 350.00	\$ 700.00
10/5/2021	Frank	Draft and provide other motion practice support to fee motion.	3.20	\$ 350.00	\$ 1,120.00
10/6/2021	Barvir	Review/revise and redraft Proposed Order Granting Motion for Attorneys' Fees.	0.40	\$ 475.00	\$ 190.00
10/6/2021	Barvir	Review/revise and redraft Notice of Motion and Motion for Attorneys' Fees.	0.50	\$ 475.00	\$ 237.50
10/6/2021	Barvir	Begin to draft declarations of AMB and CDM in support of fee motion.	0.80	\$ 475.00	\$ 380.00
10/6/2021	Barvir	Review/revise and redraft declarations of SAB and A. Peacock in support of fee motion.	1.20	\$ 475.00	\$ 570.00
10/6/2021	Barvir	Begin to review/revise and redraft Memorandum of Points & Authorities in Support of Motion and Motion for Attorneys' Fees.	2.90	\$ 475.00	\$ 1,377.50
10/6/2021	Brady	Case Management re declaration of A. Peacock supporting attorneys' fee motion; and correspondence with AMB and opposing counsel re motion.	0.60	\$ 350.00	\$ 210.00
10/6/2021	Frank	Draft and provide other motion support for fee motion.	4.00	\$ 350.00	\$ 1,400.00
10/6/2021	Palmerin	Review and revise billing reports in support of motion for attorney's fees billing project.	0.30	\$ 170.00	\$ 51.00
10/6/2021	Palmerin	Add references to all slip entries.	4.80	\$ 170.00	\$ 816.00

Date	Timekeeper	Description	Hours	Rate	Amount
10/7/2021	Barvir	Continue drafting Declaration of AMB in Support of Plaintiffs' Motion for Attorneys' Fees; review AMB billing records to determine how many hours were spent on each phase of litigation and how many hours were spent on each activity within each phase of litigation; revise and update attorney qualifications section and authentication of billing section.	1.00	\$ 475.00	\$ 475.00
10/7/2021	Barvir	Begin analyzing billing records to prepare for use as exhibits and in drafting attorney declarations in support of Plaintiffs' Motion for Attorneys' Fees; receive, review, and analyze thousands of billing slip entries and re-assign internal "references" to slips as needed based on the phase of the case the slip relates to and to write-off excessive or duplicative bills.	8.60	\$ 475.00	\$ 4,085.00
10/7/2021	Brady	Conduct correspondence with expert witness on fees to support fee motion; exchange emails with AMB re same; and exchange emails with opposing counsel re stipulating to another extension for settlement talk.	0.80	\$ 350.00	\$ 280.00
10/7/2021	Frank	Draft and perform other motion support tasks for fee motion.	5.40	\$ 350.00	\$ 1,890.00
10/7/2021	Palmerin	Exchange emails with SAB re Statement of Facts section for Motion for Attorneys' Fees.	0.10	\$ 170.00	\$ 17.00
10/8/2021	Barvir	Review/revise Declaration of AAF in Support of Plaintiffs' Motion for Attorneys' Fees; review AAF billing records to determine how many hours were spent on each phase of litigation and how many hours were spent on each activity within each phase of litigation.	0.30	\$ 475.00	\$ 142.50
10/8/2021	Barvir	Finish drafting Declaration of AAB in Support of Plaintiffs' Motion for Attorneys' Fees; review AAB billing records to determine how many hours were spent on each phase of litigation and how many hours were spent on each activity within each phase of litigation.	0.40	\$ 475.00	\$ 190.00
10/8/2021	Barvir	Begin drafting Declaration of CDM in Support of Plaintiffs' Motion for Attorneys' Fees; review CDM billing records to determine how many hours were spent on each phase of litigation and how many hours were spent on each activity within each phase of litigation	1.10	\$ 475.00	\$ 522.50
10/8/2021	Barvir	Finish analyzing billing records to prepare for use as exhibits and in drafting attorney declarations in support of Plaintiffs' Motion for Attorneys' Fees; receive, review, and analyze thousands of billing slip entries and re-assign internal "references" to slips as needed based on the phase of the case the slip relates to and to write-off excessive or duplicative bills.	8.40	\$ 475.00	\$ 3,990.00
10/8/2021	Brady	Case Management	0.20	\$ 350.00	\$ 70.00
10/8/2021	Palmerin	File Joint Stipulation and Proposed Order to Extend Time to File Motion for Attorney's Fees by sending to Nationwide Legal for in-person filing and serve by email.	0.20	\$ 170.00	\$ 34.00
10/8/2021	Palmerin	Search for Ruling on Motion to Compel Form Interrogatories and Request for Admissions and send to AMB.	0.20	\$ 170.00	\$ 34.00
10/8/2021	Palmerin	Add bookmarks to Billing reports prepared by HV and send to KTM, AMB, and HV.	0.30	\$ 170.00	\$ 51.00
10/8/2021	Palmerin	Update references of slip entries per AMB's revisions.	5.00	\$ 170.00	\$ 850.00
10/9/2021	Barvir	Draft and send email to SMF explaining [REDACTED] attach draft declaration and all SMF billing records.	0.20	\$ 475.00	\$ 95.00
10/9/2021	Barvir	Exchange emails with SAB re status of fee motion and supplemental documents, [REDACTED] also send email to SAB attaching his final draft declaration.	0.30	\$ 475.00	\$ 142.50
10/9/2021	Barvir	Review/revise Declaration of SAB in Support of Plaintiffs' Motion for Attorneys' Fees; review SAB, GSM, and paralegal billing records to confirm correct number of hours total and per billing professional is included in every declaration paragraph; revise Exhibit C spreadsheet of fee breakdown.	0.80	\$ 475.00	\$ 380.00
10/9/2021	Barvir	Continue to review/revise and redraft Memorandum of Points & Authorities in Support of Motion and Motion for Attorneys' Fees; remove arguments re lodestar multiplier; draft Statement of Facts subsections re work completed on each phase of litigation; review billing records as needed to update Statement of Facts.	1.40	\$ 475.00	\$ 665.00
10/9/2021	Barvir	Finish drafting Declaration of CDM in Support of Plaintiffs' Motion for Attorneys' Fees; review CDM billing records to determine how many hours were spent on each phase of litigation and how many hours were spent on each activity within each phase of litigation	2.20	\$ 475.00	\$ 1,045.00
10/9/2021	Barvir	Draft Declaration of SMF in Support of Plaintiffs' Motion for Attorneys' Fees; review SMF billing records to determine how many hours were spent on each phase of litigation and how many hours were spent on each activity within each phase of litigation	5.30	\$ 475.00	\$ 2,517.50
10/11/2021	Palmerin	Exchange emails with HV and AMB re preparing costs memorandum.			
			1683.50		\$ 604,851.50

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PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF SACRAMENTO

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

On October 12, 2021, the foregoing document described as

DECLARATION OF HAYDEE VILLEGAS IN SUPPORT OF PLAINTIFFS’ MOTION FOR ATTORNEYS’ FEES

on the interested parties in this action by placing

- the original
- a true and correct copy

thereof enclosed in sealed envelope(s) addressed as follows:

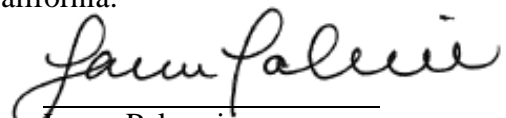
Ryan A. Hanley
Deputy Attorney General
California Department of Justice
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Ryan.Hanley@doj.ca.gov

Attorney for Defendants

- (BY OVERNIGHT MAIL)** As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for overnight delivery by UPS/FED-EX. Under the practice it would be deposited with a facility regularly maintained by UPS/FED-EX for receipt on the same day in the ordinary course of business. Such envelope was sealed and placed for collection and delivery by UPS/FED-EX with delivery fees paid or provided for in accordance with ordinary business practices.
- (BY MAIL)** As follows: I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under the practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Long Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date is more than one day after date of deposit for mailing an affidavit.

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

Executed on October 12, 2021, at Long Beach, California.



Laura Palmerin