

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

C.P., individually and on behalf of F.P., a minor child; D.O. individually and on behalf of M.O., a minor child; S.B.C., individually and on behalf of C.C., a minor child; A.S., individually and on behalf of A.A.S., a minor child; M.S., individually and on behalf of her minor child, H.S.; Y.H.S., individually and on behalf of his minor child, C.H.S.; E.M. on behalf of her minor child, C.M.; M.M., individually and on behalf of K.M.; L.G., individually and on behalf of her minor child, T.M.; E.P., individually and on behalf of her minor child, Ea.P.; and on behalf of ALL OTHERS SIMILARLY SITUATED,
Plaintiffs,

v.

NEW JERSEY DEPARTMENT OF EDUCATION; ANGELICA ALLEN-McMILLAN, Acting Commissioner of Education, in her official capacity,
Defendants.

Civil Action No. 19-cv-12807-NLH-MJS

Noel L. Hillman, U.S.D.J.

Matthew J. Skahill, U.S.M.J.

**CERTIFICATION OF
THOMAS J. O'LEARY**

Thomas J. O'Leary, of full age, hereby certifies as follows:

1. I am a partner of the law firm of Walsh Pizzi O'Reilly Falanga LLP (the "Walsh Firm"), counsel for the Plaintiffs, in the above captioned action. I submit this certification in support of Walsh's application for an award of attorneys' fees and costs pursuant to 20 U.S.C. §1415(i)(3)(B)(i)(I) and 20 U.S.C. § 1988 based on Plaintiffs' status as a prevailing party in the above captioned action.

2. I graduated from Boston College Law School in 1998. I am admitted to practice before the Courts of the State of New Jersey, the State of New York, the United States District Court for the District of New Jersey, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the United States Court of Appeals for the Third Circuit.

3. I began my legal career in 1998 as an associate at Cooper Rose and English LLP primarily practicing environmental law and representing policy holders in environmental insurance coverage litigation. Between November 2000 and July 2018, I practiced law at Connell Foley LLP as an associate (November 2000 to December 2007) and as a partner (January 2008 to July 2018) where I specialized in complex commercial litigation with an emphasis on construction law. In July 2018, I joined the Walsh Firm as a partner where I concentrate my practice in construction law and special education law.

4. I enjoyed my work practicing complex commercial litigation and likely would have continued down that path but for an unexpected personal event: my son's diagnosis of childhood apraxia of speech and dyspraxia and the struggle that my wife and I had to secure appropriate educational programming for him. My wife and I have had to sue school districts twice to secure appropriate educational programming for our son.

5. My "introduction" to special education law came in the form of a 5 year litigation before this Court regarding our son, which commenced in August 2012. *See T.O. and K.O. v. Summit City Bd. of Educ.*, No. 12-5350, 2015 WL 4548780 (D.N.J. July 27, 2015). My partner Tricia B. O'Reilly, Esq., who had no prior experience in special education law, was lead counsel in that litigation. While I did not file a notice of appearance in the litigation, I develop[ed] the legal strategy for prosecuting the case, which was executed by Ms. O'Reilly. I was the primary author

of briefs filed in opposition to the school district's appeal of the Administrative Law Judge's decision in favor of my wife and I, our motion for an interim award of counsel fee and costs based on our status as "prevailing parties," multiple briefs filed in support of motions by my wife and I to amend our counterclaim three times (all of which were granted), and a comprehensive motion for summary judgment abased on the record that was developed during documentary discovery and the depositions of nine (9) school based members of the IEP Team, two of whom were deposed on video tape. In May 2017, the case resolved to the satisfaction of my wife and I after the Court granted our motion for leave to file a Third Amended Counterclaim permitted us to assert a claim for punitive damages based on the school district's violation of the New Jersey Law Against Discrimination, *N.J.S.A. § 10:5-1 to -49*.

6. During the pendency of my son's case, I immersed myself in special education law because our case presented novel legal issues (i.e., whether and how an IDEA administrative order could be enforced in federal court when it is ignored by a school district and what relief, if any, is available to Parents when the out of district placement ordered by an ALJ, which constituted a "stay-put" placement, becomes unavailable through no fault of the Parents or the child). At the time, there was a dearth of case law addressing these legal issues. I also attended the Institute of Special Education Advocacy ("ISEA") at William and Mary Law School. ISEA was an intensive five day training program conducted by nationally recognized speakers who donate their time to train attorneys and advocates in special education advocacy.

7. The other litigation involving my son began in November 2018 when my wife and I filed a petition for due process. This ligation was against a different school district; my wife and I moved to a different town in July 2013. In May 2019, that litigation resolved to the satisfaction of my wife and I before any hearings commenced in the Office of Administrative Law.

8. As a consequence of the successful litigations that my wife and I have gotten into to secure the educational programming to which our son was entitled, other Parents started asking me to assist them in securing appropriate educational services for their children. Examples of special education cases where I have represented Parents as the Appellants before the United States Court of Appeals for the Third Circuit include:

- *K.E. v. Northern Highlands Regional Bd. of Educ.*, 840 Fed. Appx. 705 (3d Cir. Dec. 16, 2020) (vacating District Court’s entire opinion which had affirmed dismissal of Parent’s due process petition);
- *J.M. v. Summit City Board of Education*, 39 F.4th 126 (2022) (2-1 decision affirming District Court’s decision that child was not eligible for special education and related services);
- *Annette Sutton v. Plainfield Board of Education*, Case No. 22-2062 (currently pending appeal addressing the novel issue of whether a parent who is sued by a school district is a “prevailing party” when school district dismisses its due process petition with prejudice in the Office of Administrative Law).

Examples of special cases where I have represented parents before the United States District Court of New Jersey include *G.N. v. Teaneck Bd. of Educ.*, Civil Action No. 20-1589 (D.N.J.) (action for an award of attorneys’ fees pursuant to 20 U.S.C. § 1415(i)(3)(B)(i)(I); case resolved via settlement) and *C.W. v. New Providence Bd. of Educ.*, No. 22-02907 (D.N.J.) (action for an award of attorneys’ fees pursuant to 20 U.S.C. § 1415(i)(3)(B)(i)(I); case currently pending). Over the last seven years, I have represented other families in special education matters in the Office of Administrative Law and resolved other special education disputes between parents and school districts without having to resort to litigation.

9. My partner Hector D. Ruiz graduated from Rutgers University School of Law, Camden in 2001. Mr. Ruiz is admitted to practice before the Courts of the State of New Jersey, the State of New York, the United States District Court of the District of New Jersey, the United States District Court for the Northern District of New York, the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, and the United States District Court for the Western District of New York. Mr. Ruiz concentrates his practice on federal and complex commercial litigation and has represented national and regional clients across a wide spectrum of industries, including pharmaceutical, healthcare, banking, construction, manufacturing and information systems. He also represents clients as local counsel in significant intellectual property disputes, including patent claims, trademark, unfair competition and copyright. Mr. Ruiz previously served as a law clerk to the Hon. Jose L. Linares, U.S.D.J. Examples of federal litigation that Mr. Ruiz has been involved in over the course of his career include the following: *Adapt Pharma Operations Ltd. v. Teva Pharm. USA, Inc.*, 2020 WL 3428078 (D.N.J. June 22, 2020); *Cochlear Ltd. v. Oticon Med. AB*, 2018 U.S. Dist. LEXIS 183851 (D.N.J. Oct. 26, 2018); *Impax Labs., Inc. v. Actavis Labs. FL, Inc.*, 2018 U.S. Dist. LEXIS 38623 (D.N.J. Apr. 18, 2018); *Telebrands Corp. v. Mopnado*, 2016 U.S. Dist. LEXIS 10671, 2016 WL 368166 (D.N.J. Jan. 12, 2016); *Bayer Pharma AG v. Watson Labs., Inc.*, 2014 U.S. Dist. LEXIS 75071, 2014 WL 2516412 (D.N.J. June 2, 2014); *Int'l Playthings LLC v. Toy Teck Ltd., LLC*, 2013 U.S. Dist. LEXIS 186779 (D.N.J. July 23, 2013); *JPC Merger Sub LLC v. Baker Eng'g & Risk Consultants, Inc.*, 2013 U.S. Dist. LEXIS 84979, 2013 WL 3097106 (D.N.J. June 18, 2013); *Zhejiang Rongyao Chem. Co. v. Pfizer Inc.*, 2012 U.S. Dist. LEXIS 137136, 78 U.C.C. Rep. Serv. 2d (Callaghan) 635, 2012 WL 4442725 (D.N.J. 2012); *McGroder v. Lowe's Home Ctrs., Inc.*, 2011 U.S. Dist. LEXIS 109684, 2011 WL 4498779 (W.D.N.Y. Sept. 25, 2011); *Tech. Research Inst. v.*

LG Corp., 2012 U.S. Dist. LEXIS 137133, 2012 WL 4469383 (D.N.J. Sept. 25, 2012); *McLeod v. Lowe's Home Improvement*, 2011 U.S. Dist. LEXIS 60799, 2011 WL 2200757 (N.D.N.Y. June 6, 2011); *McLeod v. Lowe's Home Improvement*, 2010 U.S. Dist. LEXIS 114702, 2010 WL 4366901 (N.D.N.Y. Oct. 28, 2010); *LLDVF, L.P. v. Dinicola*, 2010 U.S. Dist. LEXIS 82078, Fed. Sec. L. Rep. (CCH) P95,839, 2010 WL 3210613 (D.N.J. Aug. 12, 2010); and *Nelson v. Xacta 3000, Inc.*, 2009 U.S. Dist. LEXIS 109580, 2009 WL 4119176 (D.N.J. Nov. 23, 2009).

10. My partner David D. Cramer graduated magna cum laude from Seton Hall University School of Law in 2011. Mr. Cramer is admitted to practice before the Courts of the State of New Jersey, the State of New York, the United States District Court of the District of New Jersey, and the United States District Court for the Southern District of New York. Mr. Cramer practices primarily in the areas of management side employment and labor litigation as well as commercial litigation.

11. My associate Gerhard Buehning is a 2015 graduate of New York Law School. Mr. Buehning is admitted to practice before the Courts of the State of New Jersey, the State of New York, the United States District Court of the District of New Jersey, and the United States Court of Appeals for the Third Circuit. He focuses his practice in business and commercial litigation. Mr. Buehning previously served as a law clerk to the Hon. Mark Falk, U.S.M.J.

12. Zahire Estrella Chambers, Esq., a former associate of the Walsh Firm, is a 2010 graduate of the University of Miami School of Law.

13. Three summer associates at the Walsh Firm who worked on this matter as time keepers are Andrew T. Frisoli, Christine Clark and Carmen Abrazado.

14. Three paralegals at the Walsh Firm who worked on this matter are Mary Hogan, Nicole Travostino, and Barbara Troyan.

15. In 2023, the Walsh Firm’s customary billing rates based on current community market rates for the attorneys who worked on this matter are: Thomas J. O’Leary (J.D. 1998) - \$630 per hour; Hector Ruiz (J.D. 2001) - \$530 per hour; Zahire Estrella Chambers (J.D. 2010) - \$450 per hour, and Gerhard Buehning (J.D. 2015) - \$445 per hour. While David Cramer’s (J.D. 2011) customary billing rate as a partner of the Walsh Firm is \$500/hr, he was an associate when he worked on this matter. Accordingly, his time is being billed at the “Associate Level One” rate of \$450 per hour for purposes of this fee application.

16. In 2023, the Walsh Firm’s customary billing rate based on current community market rates for the law clerks who worked on this matter is \$290 per hour. The Walsh Firm’s customary billing rate for 2023 for the paralegals who worked on this matter is \$235 per hour.

17. During this matter, Walsh Firm timekeepers kept contemporaneous records in our practice management system documenting professional time spent and out of pocket costs incurred. The draft invoice attached to this Certification was created by exporting the information maintained in the Walsh Firm’s practice management system.

18. In this matter, I billed a total of 1,772.3 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
May 2019	630	11.2	\$7,056.00
June 2019	630	0.5	\$315.00
July 2019	630	4.9	\$3,087.00
August 2019	630	42.3	\$26,649.00
September 2019	630	0.7	\$441.00
October 2019	630	48.3	\$30,429.00
November 2019	630	22.2	\$13,986.00
December 2019	630	1.2	\$756.00
January 2020	630	22.5	\$14,175.00
February 2020	630	51.3	\$32,319.00
March 2020	630	30.9	\$19,467.00
April 2020	630	4.4	\$2,772.00

May 2020	630	4.5	\$2,835.00
June 2020	630	8.0	\$5,040.00
July 2020	630	2.9	\$1,827.00
August 2020	630	0.4	\$252.00
September 2020	630	9.5	\$5,985.00
October 2020	630	2.1	\$1,323.00
November 2020	630	0.6	\$378.00
December 2020	630	20.8	\$13,104.00
January 2021	630	31.8	\$20,034.00
February 2021	630	41.8	\$26,334.00
March 2021	630	57.7	\$36,351.00
April 2021	630	26.1	\$16,443.00
May 2021	630	37.0	\$23,310.00
June 2021	630	22.7	\$14,301.00
July 2021	630	63.8	\$40,194.00
August 2021	630	81.1	\$51,093.00
September 2021	630	84.6	\$53,298.00
October 2021	630	17.8	\$11,214.00
November 2021	630	33.0	\$20,790.00
December 2021	630	82.9	\$52,227.00
January 2022	630	58.2	\$36,666.00
February 2022	630	91.2	\$57,456.00
March 2022	630	71.9	\$45,297.00
April 2022	630	60.9	\$38,367.00
May 2022	630	29.4	\$18,522.00
June 2022	630	29.1	\$18,333.00
July 2022	630	8.8	\$5,544.00
August 2022	630	89.3	\$56,259.00
September 2022	630	147.4	\$92,862.00
October 2022	630	73.5	\$46,305.00
November 2022	630	30.1	\$18,963.00
December 2022	630	123.5	\$77,805.00
January 2023	630	62.2	\$39,186.00
Thru Feb. 14, 2023	630	27.3	\$17,199.00
		1772.3	\$1,116,549.00

19. In this matter, Mr. Ruiz billed a total of 360.9 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
February 2020	530	24.5	\$12,985.00
March 2020	530	46.6	\$24,698.00
April 2020	530	6.3	\$3,339.00

May 2020	530		0.00
June 2020	530	10.6	\$5,618.00
July 2020	530	7.3	\$3,869.00
August 2020	530	0.2	\$106.00
September 2020	530	0.7	\$371.00
October 2020	530		0.00
November 2020	530	0.7	\$371.00
December 2020	530	30.0	\$15,900.00
January 2021	530	27.7	\$14,681.00
February 2021	530	22.8	\$12,084.00
March 2021	530	9.1	\$4,823.00
April 2021	530	7.6	\$4,028.00
May 2021	530	5.9	\$3,127.00
June 2021	530	4.8	\$2,544.00
July 2021	530	42.0	\$22,260.00
August 2021	530	22.9	\$12,137.00
September 2021	530	18.6	\$9,858.00
October 2021	530	6.7	\$3,551.00
November 2021	530	10.6	\$5,618.00
December 2021	530	23.0	\$12,190.00
January 2022	530	4.0	\$2,120.00
February 2022	530	7.6	\$4,028.00
March 2022	530	1.1	\$583.00
April 2022	530	1.3	\$689.00
May 2022	530	2.4	\$1,272.00
June 2022	530	1.9	\$1,007.00
July 2022	530	1.0	\$530.00
August 2022	530	2.6	\$1,378.00
September 2022	530	5.3	\$2,809.00
October 2022	530	0.7	\$371.00
November 2022	530	0.2	\$106.00
December 2022	530	3.6	\$1,908.00
January 2023	530	0.5	\$265.00
Thru Feb. 14, 2023	530	0.1	\$53.00
		360.9	\$191,277.00

20. In this matter, Mr. Cramer billed a total of 109.7 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
May 2019	450	0.5	\$225.00
October 2019	450	0.2	\$90.00

November 2019	450	3.0	\$1,350.00
March 2021	450	37.8	\$17,010.00
April 2021	450	11.3	\$5,085.00
August 2021	450	22.2	\$9,990.00
September 2021	450	8.5	\$3,825.00
December 2021	450	26.2	\$11,790.00
		109.7	\$49,365.00

21. In this matter, Mr. Buehning billed a total of 146.7 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
March 2021	445	5.5	\$2,447.50
July 2021	445	4.0	\$1,780.00
August 2021	445	8.2	\$3,649.00
January 2022	445	16.8	\$7,476.00
September 2022	445	31.0	\$13,795.00
October 2022	445	19.8	\$8,811.00
November 2022	445	5.6	\$2,492.00
December 2022	445	30.4	\$13,528.00
January 2023	445	24.9	\$11,080.50
Thru Feb. 14, 2023	445	0.5	\$222.50
		146.7	\$65,281.50

22. In this matter, Ms. Estrella Chambers billed a total of 0.7 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
February 2021	450	0.7	\$315.00
		0.7	\$315.00

23. In this matter, Carmen Abrazado billed a total of 8.9 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
July 2021	290	8.9	\$2,581.00

		8.9	\$2,581.00
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24. In this matter, Christine Clark billed a total of 4.5 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
February 2021	290	4.5	\$1,305.00
		4.5	\$1,305.00

25. In this matter, Andrew Frisoli billed a total of 2.4 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
July 2019	290	2.4	\$696.00
		2.4	\$696.00

26. In this matter, Mary Hogan billed a total of 263.0 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
February 2021	235	23.6	\$5,546.00
March 2021	235	10.2	\$2,397.00
April 2021	235	13.9	\$3,226.50
May 2021	235	6.6	\$1,551.00
June 2021	235	11.4	\$2,679.00
July 2021	235	50.0	\$11,750.00
August 2021	235	19.9	\$4,676.50
September 2021	235	5.7	\$1,339.50
October 2021	235	9.2	\$2,162.00
November 2021	235	19.9	\$4,676.50
December 2021	235	12.5	\$2,937.50
January 2022	235	25.8	\$6,063.00
February 2022	235	31.4	\$7,379.00
March 2022	235	6.0	\$1,410.00
April 2022	235	1.8	\$423.00
May 2022	235	1.9	\$446.50

June 2022	235	0.3	\$70.50
July 2022	235	0.5	\$117.50
August 2022	235	1.7	\$399.50
September 2022	235	8.5	\$2,056.50
October 2022	235	1.2	\$282.00
November 2022	235	0.1	\$23.50
December 2022	235	0.5	\$117.50
January 2023	235	0.3	\$70.50
Thru Feb. 14, 2023	235	0.1	\$23.50
		263.0	\$61,805.00

27. In this matter, Nicole Travostino billed a total of 29.2 hours, broken down by month and year as follows:

MONTH & YEAR	RATE	HOURS	TOTAL
June 2019	235	0.3	\$70.5
January 2021	235	9.8	\$2,303.00
February 2021	235	9.4	\$2,209.00
March 2021	235	0.4	\$94.00
April 2021	235		0.00
May 2021	235	0.3	\$70.50
June 2021	235		0.00
July 2021	235	2.7	\$634.50
August 2021	235	2.5	\$587.50
September 2021	235	3.8	\$893.00
		29.2	\$6,862.00

28. In this matter, Barbara Troyan billed a total of 0.4 hours, broken down by month and year as follows

MONTH & YEAR	RATE	HOURS	TOTAL
August 2021	235	0.4	\$94.00
		0.4	\$94.00

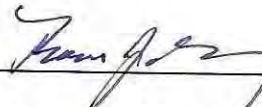
29. The Walsh Firm incurred expenses of \$48,564.73 in this matter as reflected in Exhibit 1 annexed hereto.

30. The total lodestar for Walsh Pizzi O'Reilly Falanga LLP is \$1,544,695.23, calculated as follows:

	RATE	HOURS	TOTAL
Thomas J. O'Leary	630	1,772.3	\$1,116,549.00
Hector D. Ruiz	530	360.9	\$191,277.00
David C. Cramer	450	109.7	\$49,365.00
Gerhard Buehning	445	146.7	\$65,281.50
Zahire Estrella Chambers	450	0.7	\$315.00
Carmen Abrazado	290	8.9	\$2,581.00
Christine Clark	290	4.5	\$1,305.00
Andrew Frizoli	290	2.4	\$696.00
May Hogan	235	263.0	\$61,805.00
Nicole Travostino	235	29.2	\$6,862.00
Barbara Troyan	235	0.4	\$94.00
Expenses			\$48,564.73
			\$1,544,695.23

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

Dated: February 14, 2023



Thomas J. O'Leary

16915

Three Gateway Center
 100 Mulberry Street, 15th Floor
 Newark, NJ 07102
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J.M. and E.M.
 40 Madison Avenue
 Summit, NJ 07901

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 Client: 001489
 Matter: 000001
 Invoice #: 0
 Resp. Atty: TJO
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RE: NJDOE and Lamont Repollet

For Professional Services Rendered Through February 09, 2023

SERVICES

Date	Person	Description of Services	Hours	Amount
5/8/2019	TJO	PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL REGARDING POTENTIAL CLASS COMPLAINT.	0.3	\$189.00
5/12/2019	TJO	REVIEW DRAFT CLASS COMPLAINT AND PROVIDE COMMENTS ON SAME.	1.4	\$882.00
5/14/2019	TJO	REVISE COUNT III OF DRAFT CLASS COMPLAINT.	0.4	\$252.00
5/15/2019	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STRATEGY FOR CLASS COMPLAINT (0.8); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.2); REVIEW LATEST DRAFT OF COMPLAINT AND PROVIDE J. RUE WITH REVISIONS TO COMPLAINT (0.6).	1.6	\$1,008.00
5/16/2019	TJO	RESEARCH REGARDING SOVEREIGN IMMUNITY ISSUE (0.5); REVIEW EDITS AND REVISE CLASS COMPLAINT (0.4).	0.9	\$567.00
5/21/2019	TJO	REVIEW TERM SHEET OF AGREEMENT BETWEEN CO COUNSEL (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.2); REVIEW AND COMMENT ON COMPLAINT (0.4); TELEPHONE CONFERENCE WITH COUNSEL FOR PLAINTIFFS REGARDING FILING AND LEGAL STRATEGY (0.5); REVIEW REVISED DRAFT OF COMPLAINT AND COMMENT ON SAME (0.4); LEGAL RESEARCH REGARDING CASELAW WHERE PRELIMINARY INJUNCTION WAS GRANTED FOR FAILURE TO COMPLY WITH TIMELINE FOR COMPLETING DUE PROCESS HEARINGS (1.5); EMAIL CASE TO J. RUE (0.1).	3.2	\$2,016.00

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Client: 001489
Matter: 000001
Invoice #: 0
Resp. Atty: TJO
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SERVICES

Date	Person	Description of Services	Hours	Amount
5/22/2019	TJO	PERFORM FINAL REVIEW OF COMPLAINT BEFORE FILING (0.3); REVIEW EDITS TO COMPLAINT PROPOSED BY D. DWYER (0.1); REVIEW EMAIL FROM J. RUE AND ADVISE OF AGREEMENT TO FILE MOTION FOR PROVISIONAL CLASS CERTIFICATION (0.1); REVIEW ASSOC (ZEC) COMMENTS ON BRIEF FOR PROVISIONAL CLASS CERTIFICATION, MAKE ADDITIONAL EDITS TO BRIEF, AND EMAIL PROPOSED EDITS TO J. RUE (0.3); REVIEW PROPOSED CONSENT ORDER AND ADVISE J. RUE OF NO OBJECTION TO FORM OF ORDER (0.1).	0.9	\$567.00
5/23/2019	TJO	REVIEW EMAIL FROM J. RUE REGARDING REQUESTING REVISIONS TO AGREEMENT; EMAIL ASSOC. (DC) REGARDING SAME.	0.1	\$63.00
5/23/2019	DDC	REVIEW, REVISE, AND REDLINE JOINT REPRESENTATION AGREEMENT.	0.5	\$225.00
5/24/2019	TJO	REVISE PROPOSED JOINT PROSECUTION AND COMMON INTEREST AGREEMENT.	2.3	\$1,449.00
5/31/2019	TJO	REVIEW AND COMMENT ON NOTICES OF APPEARANCE.	0.1	\$63.00
6/3/2019	NMT	ATTEND TO DRAFTS OF NOTICES OF APPEARANCE FOR T. O'LEARY, Z. ESTRELLA-CHAMBERS AND D. CRAMER; PREPARE, FINALIZE AND FILE NOTICES OF APPEARANCE.	0.3	\$70.50
6/5/2019	TJO	REVIEW AND SIGN JOINT PROSECUTION AGREEMENT.	0.2	\$126.00
6/18/2019	TJO	REVIEW EMAIL FROM COURT REGARDING NOTICE OF APPEARANCE BY K. SORANNO AND APPLICATION FOR CLERK'S EXTENSION.	0.1	\$63.00
6/19/2019	TJO	REVIEW EMAIL FROM COURT REGARDING TEXT ORDER GRANTING APPLICATION FOR CLERK'S EXTENSION; REVIEW EMAIL FROM J. RUE REGARDING CONFERENCE CALL WITH DAG'S OFFICE.	0.1	\$63.00
6/27/2019	TJO	REVIEW EMAIL FROM J. RUE REGARDING CONSENT CMO STRATEGY AND RESPOND.	0.1	\$63.00
7/5/2019	TJO	REVIEW NOTICE FROM COURT REGARDING STATE'S REQUEST FOR EXTENSION TO FILE AN ANSWER.	0.1	\$63.00
7/8/2019	TJO	REVIEW EMAIL FROM J. RUE REGARDING TRANSFER OF "RELATED CASES" TO JUDGE HILLMAN AND RESPOND (0.2); REVISE AGREEMENT BETWEEN CO-COUNSEL REGARDING ATTORNEYS FEES (0.9).	1.1	\$693.00
7/10/2019	TJO	REVIEW J. RUE'S COMMENTS TO AGREEMENT REGARDING FEES AND COSTS (0.3); EXCHANGE EMAILS WITH J. RUE REGARDING REVISIONS TO AGREEMENT (0.1); PARTICIPATE IN CONFERENCE CALL WITH ALL COUNSEL (0.9).	1.3	\$819.00
7/11/2019	TJO	REVIEW EMAILS FROM CO-COUNSEL (0.2); DRAFT EMAIL TO PARTNER (CIG) REGARDING RESEARCH ASSISTANCE NEEDED FROM SUMMER ASSOCIATE REGARDING CASES FOR PI MOTION ON 45 DAY RULE (0.2).	0.4	\$252.00

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7/15/2019	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING REVISIONS TO JOINT AGREEMENT REGARDING ATTORNEYS FEES (0.2); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.2); PRELIMINARY RESEARCH REGARDING CASES FOR PI MOTION (0.7).	1.1	\$693.00
7/16/2019	TJO	REVIEW EMAILS EXCHANGED BETWEEN J. RUE AND DAG'S OFFICE REGARDING CMO AND POTENTIAL MOTION PRACTICE.	0.1	\$63.00
7/16/2019	ATF	CONDUCTED LEGAL RESEARCH REGARDING PRELIMINARY INJUNCTION TO ENFORCE 45 DAY RULE.	2.4	\$696.00
7/17/2019	TJO	REVIEW CASE IDENTIFIED BY SUMMER ASSOC. (AF) FOR PI APPLICATION.	0.1	\$63.00
7/18/2019	TJO	REVIEW CASES LOCATED BY SUMMER ASSOC. (AF) FOR PI APPLICATION.	0.3	\$189.00
7/19/2019	TJO	REVIEW EMAIL FROM R. THURSTON REGARDING STATE'S THIRD REQUEST TO EXTEND THE TIME TO ANSWER AND/OR MOVE IN RESPONSE TO COMPLAINT.	0.1	\$63.00
7/24/2019	TJO	REVIEW EMAIL FROM R. THURSTON AND RESPOND.	0.2	\$126.00
7/29/2019	TJO	REVIEW EMAIL FROM J. RUE REGARDING CONSENT ORDER.	0.1	\$63.00
8/1/2019	TJO	REVIEW EMAIL FROM J. RUE.	0.1	\$63.00
8/5/2019	TJO	DRAFT EMAIL TO CO-COUNSEL REGARDING AGREEMENT FOR FEES AND COSTS (0.2); REVIEW MOTION TO DISMISS FILED BY STATE (1.0).	1.2	\$756.00
8/6/2019	TJO	RESPOND TO EMAIL FROM J. RUE REGARDING AVAILABILITY FOR CONFERENCE CALL REGARDING STATE'S MOTION TO DISMISS; REVIEW ENOTICE FROM COURT REGARDING DATES FOR MOTION TO DISMISS.	0.1	\$63.00
8/7/2019	TJO	REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL REGARDING WHETHER DOE LETTERS PROMULAGATED ON 8/6 MOOT CASE.	0.1	\$63.00
8/13/2019	TJO	PREPARE FOR CONFERENCE CALL REGARDING STATE'S MOTION TO DISMISS (0.3); PARTICIPATE IN CONFERENCE CALL WITH COUNSEL REGARDING SAME (1.0).	1.3	\$819.00
8/16/2019	TJO	LEGAL RESEARCH REGARDING AVAILABILITY OF SECTION 1983 TO ENFORCE CODE PROVISION ENACTED PURSUANT TO IDEA.	3.9	\$2,457.00
8/20/2019	TJO	CONTINUE LEGAL RESEARCH REGARDING ENFORCEMENT OF 45 DAY RULE VIA SECTION 1983 (2.6); BEGIN DRAFTING BRIEF POINT REGARDING SAME (5.7).	8.3	\$5,229.00

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8/21/2019	TJO	CONTINUE DRAFTING OPPOSITION TO STATE'S MOTION TO DISMISS 1983 CLAIM (7.3); BEGIN RESEARCHING WHETHER COMMISSIONER CAN BE SUED IN 1983 ACTION SEEKING PROSPECTIVE RELIEF (0.9); EMAIL J. RUE REGARDING SAME (0.1).	8.3	\$5,229.00
8/22/2019	TJO	DRAFT EMAIL TO CLIENT REGARDING ADDITIONAL ALLEGATIONS IN COMPLAINT TO AVOID MOOTNESS CHALLENGE (0.8); REVISE COMPLAINT TO AVOID ISSUES WITH RESPECT TO 1983 ACTION (0.6); DRAFT EMAIL TO J. RUE FORWARDING REVISIONS TO COMPLAINT (0.1); CONTINUE DRAFTING OPPOSITION TO MOTION TO DISMISS 1983 COUNT (6.6).	8.1	\$5,103.00
8/23/2019	TJO	REVIEW DRAFT AMENDED COMPLAINT AND PROVIDE J. RUE WITH COMMENTS ON SAME (0.6); PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL (0.8); CONTINUE DRAFTING OPPOSITION TO STATE'S MOTION TO DISMISS 1983 CLAIM (4.5).	5.9	\$3,717.00
8/25/2019	TJO	CONTINUE DRAFTING OPPOSITION TO STATE'S MOTION TO DISMISS 1983 ACTION.	2.4	\$1,512.00
8/26/2019	TJO	CONTINUE DRAFTING/REVISING BRIEF POINT REGARDING MOTION TO DISMISS (2.1); REVIEW AMENDED COMPLAINT (0.1); REVIEW LETTER FROM J. RUE TO JUDGE HILMAN REGARDING TERMINATION OF MOTION TO DISMISS (0.1); EMAIL J. RUE REGARDING AGREEMENT BETWEEN COUNSEL REGARDING LEGAL FEE AWARD (0.1).	2.4	\$1,512.00
8/27/2019	TJO	EMAIL J. RUE REGARDING ERROR IN AMENDED COMPLAINT; REVIEW RESPONSIVE EMAIL AND RESPOND.	0.2	\$126.00
9/3/2019	TJO	REVIEW EMAIL FROM J. RUE.	0.1	\$63.00
9/5/2019	TJO	REVIEW APPLICATION FOR CLERK EXTENSION FILED BY STATE.	0.2	\$126.00
9/6/2019	TJO	REVIEW NOTICE FROM COURT REGARDING APPROVING CLERK EXTENSION APPLICATION.	0.1	\$63.00
9/19/2019	TJO	REVIEW LETTER FROM STATE TO COURT REGARDING EXTENSION OF TIME TO FILE ANSWER OR OTHERWISE MOVE.	0.1	\$63.00
9/20/2019	TJO	REVIEW ORDER ENTERED BY COURT.	0.1	\$63.00
9/23/2019	TJO	REVIEW EMAIL FROM R. THURSTON.	0.1	\$63.00
10/7/2019	TJO	BEGIN REVIEW OF DRAFT PRELIMINARY INJUNCTION BRIEF (0.7).	0.7	\$441.00
10/8/2019	TJO	REVIEW EMAIL FROM J. RUE REGARDING CLASS CERTIFICATION MOTION AND RESPOND.	0.1	\$63.00
10/9/2019	TJO	CONTINUE REVIEW OF PRELIMINARY INJUNCTION BRIEF (1.0); REVIEW CASES CITED IN BRIEF (0.8); DRAFT EMAIL TO J. RUE ADVISING OF OPINION THAT SUBSTANTIAL REVISIONS NEED TO BE MADE TO BRIEF (0.6).	2.4	\$1,512.00

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10/10/2019	TJO	CONTINUE LEGAL RESEARCH TO IDENTIFY CASES WHERE SOVEREIGN IMMUNITY HAD BEEN WAIVED AND COURT ENTERED INJUNCTION AGAINST STATE (4.5); BEGIN REVISING BRIEF (2.9).	7.4	\$4,662.00
10/11/2019	TJO	CONTINUE REVISING BRIEF FOR PRELIMINARY INJUNCTION.	7.3	\$4,599.00
10/14/2019	TJO	CONTINUE REVISING BRIEF FOR PRELIMINARY INJUNCTION (5.6); REVIEW BRIEF FOR CLASS CERTIFICATION AND BEGIN REVISING SAME (1.1).	6.7	\$4,221.00
10/15/2019	TJO	CONTINUE REVISING CLASS CERTIFICATION BRIEF (1.1); DRAFT EMAIL TO J. RUE FORWARDING OUR REVISIONS TO PI AND CLASS CERTIFICATION BRIEFS (0.1); REVIEW EMAIL FROM J. RUE REGARDING RAISING QUESTION ABOUT COMMENT ON PI BRIEF AND RESPOND (0.1); BEGIN REVIEWING REVISED BRIEFS FORWARDED BY J. RUE THAT INCORPORATED REVISIONS MADE BY WALSH FIRM (0.3).	1.6	\$1,008.00
10/16/2019	TJO	REVIEW MOTION TO DISMISS FILED BY STATE.	0.7	\$441.00
10/17/2019	TJO	PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL REGARDING COMMENTS ON BRIEFS (0.7); REVISE POINT II OF PI BRIEF IN LIGHT OF C. REISMAN'S COMMENTS (3.5).	4.2	\$2,646.00
10/18/2019	TJO	CONTINUE REVISING BRIEF FOR PRELIMINARY INJUNCTION IN LIGHT OF C. REISMAN'S COMMENTS (1.5); BEGIN REVISING BRIEF POINT IN OPPOSITION TO MOTION TO STATE'S MOTION TO DISMISS REGARDING COMMISSIONER IS NOT A NECESSARY PARTY (4.9).	6.4	\$4,032.00
10/21/2019	TJO	REVIEW REVISIONS SUGGESTED BY C. REISMAN (0.3); REVISE PI BRIEF (1.7); EMAIL REVISED PI BRIEF TO J. RUE AND D. SOUTAR (0.1).	2.1	\$1,323.00
10/22/2019	TJO	REVIEW EMAIL FROM J. RUE REGARDING EXECUTION OF BRIEFS AND RESPOND (0.1); REVISE OPPOSITION BRIEF POINT REGARDING WHETHER COMMISSIONER IS A NECESSARY PARTY (1.2); BEGIN REVISING BRIEF POINT OPPOSING APPLICATION TO DISMISS SECTION 1983 CLAIM (1.0).	2.3	\$1,449.00
10/23/2019	TJO	CONTINUE REVISING SECTION 1983 BRIEF POINT FOR OPPOSITION TO STATE'S MOTION TO DISMISS (2.4); EMAIL DRAFT OPPOSITION TO J. RUE AND D. SOUTAR (0.1).	2.5	\$1,575.00
10/28/2019	TJO	DOWNLOAD AND REVIEW PRELIMINARY INJUNCTION AND CLASS CERTIFICATION MOTIONS (0.6); EMAIL MOTION BRIEFS TO CLIENT (0.1); REVIEW TEXT ORDER SCHEDULING ARGUMENT (0.1); EMAIL J. RUE REGARDING ADJOURNMENT REQUESTS (0.1).	0.9	\$567.00
10/29/2019	TJO	TELEPHONE CONFERENCE WITH J. RUE AND J. ROSEN VALVERDE.	0.2	\$126.00
10/29/2019	DDC	CALL WITH COUNSEL REGARDING CASE LAW RESEARCH FOR MOTION.	0.1	\$45.00

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10/29/2019	DDC	EMAIL WITH COUNSEL REGARDING CASE LAW RESEARCH FOR MOTION.	0.1	\$45.00
10/30/2019	TJO	REVIEW CORRESPONDENCE FROM DAG'S OFFICE REQUESTING ADJOURNMENT OF MOTIONS; REVIEW CORRESPONDENCE FROM J. RUE REGARDING OBJECTING TO ADJOURNMENT REQUEST.	0.1	\$63.00
10/30/2019	TJO	BEGIN RESEARCH REGARDING AUTHORITY FOR ARGUMENT THAT PURPOSE OF IDEA IS TO PROTECT DISABLED CHILDREN (0.6); BEGIN RESEARCH REGARDING RELIEF PERIOD FOR DUE PROCESS PETITION (0.7).	1.3	\$819.00
10/31/2019	TJO	PERFORM LEGAL RESEARCH REGARDING LEGISLATIVE HISTORY OF IDEA (0.6); CONTINUE RESEARCH REGARDING WHEN RELIEF PERIOD ENDS FOR SPECIAL EDUCATION CASE (0.8).	1.4	\$882.00
11/4/2019	TJO	CONTINUE RESEARCH REGARDING RIGHTS THAT ATTACH ONCE CLASS IS CERTIFIED.	1.7	\$1,071.00
11/4/2019	DDC	LEGAL RESEARCH REGARDING CLASS CERT MOTION.	3.0	\$1,350.00
11/5/2019	TJO	REVIEW EMAILS EXCHANGED BETWEEN J. RUE AND AMICUS COUNSEL.	0.1	\$63.00
11/8/2019	TJO	REVIEW AND EDIT BRIEF.	0.6	\$378.00
11/11/2019	TJO	REVIEW CERTIFICATIONS FILED BY AMICI.	0.4	\$252.00
11/12/2019	TJO	RESEARCH WHETHER IDEA EXHAUSTION IS A JURISDICTIONAL PREREQUISITE (2.1); BEGIN REVIEWING AND REVISING OPPOSITION TO STATE'S MOTION TO DISMISS (1.7).	3.8	\$2,394.00
11/13/2019	TJO	REVIEW SECOND DRAFT OF OPPOSITION TO MOTION TO DISMISS AND PROVIDE J. RUE WITH PROPOSED REVISIONS ON SAME (1.2); REVIEW THIRD DRAFT OF OPPOSITION TO MOTION TO DISMISS AND PROPOSE REVISIONS TO SAME (0.4).	1.6	\$1,008.00
11/14/2019	TJO	REVIEW NOTICE FROM COURT REGARDING NOTICE OF APPEARANCE FILED BY J. ROSEN VALVERDE.	0.1	\$63.00
11/15/2019	TJO	REVIEW EMAIL FROM D. GILES AND RESPOND REGARDING COMMENTS ON OPPOSITION TO MOTION TO DISMISS.	0.1	\$63.00
11/18/2019	TJO	REVIEW 2 BRIEFS FILED BY STATE IN OPPOSITION TO CLASS CERTIFICATION MOTION AND PRELIMINARY INJUNCTION MOTION (0.9); REVIEW CASES CITED IN STATE'S OPPOSITION TO PI MOTION (1.2).	2.1	\$1,323.00
11/19/2019	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING PREPARATION OF REPLY BRIEFS.	0.4	\$252.00
11/20/2019	TJO	BEGIN DRAFTING REPLY BRIEF FOR PI MOTION.	3.4	\$2,142.00
11/21/2019	TJO	CONTINUE DRAFTING REPLY BRIEF FOR PI MOTION.	5.7	\$3,591.00

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11/22/2019	TJO	REVISE REPLY BRIEF FOR PI MOTION.	0.9	\$567.00
11/25/2019	TJO	REVIEW CORRESPONDENCE FROM DAG SORRANO TO COURT (0.1); EMAIL D. SOUTAR REGARDING THOUGHTS ON RESPONSE TO CORRESPONDENCE (0.1); PERFORM LAST REVIEW OF REPLY BRIEF FOR PI MOTION PRIOR TO FILING WITH COURT (0.1); FILE REPLY BRIEF WITH THE COURT (0.1).	0.4	\$252.00
11/26/2019	TJO	REVIEW REPLY BRIEFS FILED BY JRA AND STATE (0.5); REVIEW CORRESPONDENCE FILED BY STATE AND JRA WITH THE COURT (0.2); EXCHANGE EMAILS WITH J. VALVERDE AND D. SOUTAR REGARDING WHETHER AMICI SHOULD RESPOND TO STATE'S OPPOSITION REGARDING ORAL ARGUMENT REQUEST (0.1).	0.8	\$504.00
11/27/2019	TJO	REVIEW NOTICE FROM COURT REGARDING ADJOURNING ORAL ARGUMENT.	0.1	\$63.00
12/2/2019	TJO	REVIEW EMAILS EXCHANGED BETWEEN J. VELARDE AND J. RUE REGARDING BRIEFING SCHEDULE FOR STATE'S OPPOSITION TO AMICUS PARTICIPATION (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING BRIEFING SCHEDULE (0.2).	0.3	\$189.00
12/4/2019	TJO	REVIEW LETTER FROM DAG TO COURT REGARDING DISPUTE REGARDING ORAL ARGUMENT ON PENDING MOTIONS.	0.1	\$63.00
12/9/2019	TJO	REVIEW EMAILS FROM R. THURSTON.	0.1	\$63.00
12/10/2019	TJO	REVIEW TEXT ORDER FROM COURT.	0.1	\$63.00
12/13/2019	TJO	REVIEW STATE'S OPPOSITION TO AMICUS APPLICATION.	0.1	\$63.00
12/16/2019	TJO	REVIEW REPLY BRIEF FILED BY J. RUE (0.1); REVIEW DRAFT REPLY BRIEFS BY AMICUS AND COMMENT ON SAME (0.2).	0.3	\$189.00
12/19/2019	TJO	REVIEW DECISION AND ORDER ON AMICUS PARTICIPATION (0.1); EMAIL J. VALVERDE AND J. RUE REGARDING SAME (0.1).	0.2	\$126.00
1/2/2020	TJO	REVIEW EMAIL FROM R. THURSTON.	0.1	\$63.00
1/6/2020	TJO	REVIEW CORRESPONDENCE FROM DAG REQUESTING ADJOURNMENT OF ARGUMENT.	0.1	\$63.00
1/7/2020	TJO	REVIEW CORRESPONDENCE FROM J. RUE REGARDING OBJECTING TO STATE'S REQUEST FOR AN EXTENSION OF 1/22 ARGUMENT DATE.	0.1	\$63.00

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1/15/2020	TJO	TELEPHONE CONFERENCE WITH J. RUE REGARDING ALTERNATIVE DATES FOR ARGUMENT ON MOTIONS (0.1); REVIEW EMAIL FROM K. SORRANO REGARDING SAME (0.1); DRAFT EMAIL TO J. RUE AND J. VALVERDE ROSEN POINTING OUT SUGGESTION IN SORRANO'S EMAIL THAT PLAINTIFFS CONSENTED TO ADJOURNMENT REQUEST (0.1); REVIEW EMAIL FROM J. VALVERDE ROSEN TO K. SORRANO ADVISING THAT AMICI DO NOT CONSENT TO ADJOURNMENT REQUEST (0.1); REVIEW LETTER FILED BY STATE WITH COURT ADVISING OF ALTERNATE DATES WHERE COUNSEL IS AVAILABLE FOR ARGUMENT (0.1).	0.5	\$315.00
1/21/2020	TJO	REVIEW EMAILS FROM J. RUE REGARDING DOE REVISED GUIDELINES FOR DP HEARINGS (0.2); REVIEW EMAIL FROM D. DWYER REGARDING SAME (0.1); ANALYZE GUIDELINES (0.7); REVIEW MEMO BY J. RUE REGARDING SAME (0.2); PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL TO DISCUSS POTENTIAL TRO APPLICATION (0.8); PARTICIPATE IN SECOND CALL WITH J. RUE, C. REISMAN, AND J. GRAN REGARDING ALLOCATION OF RESPONSIBILITIES FOR TRO APPLICATION (0.6).	2.6	\$1,638.00
1/22/2020	TJO	LEGAL RESEARCH REGARDING REQUIREMENTS TO OBTAIN TRO PENDING HEARING ON PI APPLICATION (0.4); EMAIL J. RUE AND C. REISMAN REGARDING RESULTS OF RESEARCH (0.2); REVIEW EMAIL FROM C. REISMAN REGARDING STRATEGY FOR TRO APPLICATION AND RESPOND (0.1); BEGIN DRAFTING LIKELIHOOD OF SUCCESS PORTION OF BRIEF IN SUPPORT OF TRO AND PI APPLICATION (5.9).	6.6	\$4,158.00
1/23/2020	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STRATEGY FOR TRO MOTION (0.4); CONTINUE DRAFTING LIKELIHOOD OF SUCCESS BRIEF POINT (5.4).	5.8	\$3,654.00
1/24/2020	TJO	CONTINUE DRAFTING BRIEF POINT REGARDING PRELIMINARY INJUNCTION REGARDING GUIDELINES REGARDING DUE PROCESS HEARINGS.	4.0	\$2,520.00
1/27/2020	TJO	REVIEW AND COMMENT ON OTSC APPLICATION.	0.9	\$567.00
1/27/2020	TJO	REVIEW EMAILS FROM CO-COUNSEL REGARDING NJDOE'S SUBMISSION OF GUIDELINES TO USDOE (0.1); REVIEW LETTER FROM NJDOE TO USDOE REGARDING SAME (0.1).	0.2	\$126.00
1/28/2020	TJO	REVIEW TEXT ORDER FROM COURT (0.1); REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL REGARDING PI APPLICATION (0.3); PERFORM LEGAL RESEARCH PER C. REISMAN'S REQUEST FOR PI APPLICATION REGARDING FOX IN CHICKEN COOP ARGUMENT (0.9); REVIEW EMAIL FROM DAG SORRIANO REGARDING START DATE FOR IMPLEMENTATION OF GUIDELINES (0.1).	1.3	\$819.00
1/30/2020	TJO	EXCHANGE EMAILS WITH CO-COUNSEL REGARDING NJDOE'S RESPONSE TO OPRA REQUEST FOR COPY OF MEMORANDUM OF AGREEMENT BETWEEN NJDOE AND OAL.	0.1	\$63.00

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1/31/2020	TJO	EXCHANGE EMAILS WITH J. ROSEN VALVERDE: AMICUS BRIEF REGARDING PI MOTION REGARDING GUIDELINES (0.1); REVIEW ORDER TO SHOW CAUSE ENTERED BY COURT AND EMAIL CLIENTS REGARDING; ENTRY OF ORDER (0.1).	0.2	\$126.00
2/3/2020	TJO	PERFORM LEGAL RESEARCH FOR AMICUS COUNSEL (0.5); EMAIL RESULTS OF RESEARCH TO COUNSEL (0.1).	0.6	\$378.00
2/4/2020	TJO	REVIEW AND COMMENT ON AMICUS BRIEF FOR PI MOTION ON GUIDELINES (1.7); REVIEW EMAIL FROM J. ROSEN VALVERDE REGARDING ARGUMENT STRATEGY AND DRAFT RESPONSIVE EMAIL (0.3); REVIEW EMAIL FROM J. ROSEN VALVERDE REGARDING 20 USC 1412(A)(19) ARGUMENT AND DRAFT RESPONSIVE ARGUMENT (0.3); REVIEW EMAIL FROM J. ROSEN AND VALVERDE REGARDING REQUESTING SECRETARIAL ASSISTANCE AND RESPOND (0.1).	2.4	\$1,512.00
2/5/2020	TJO	REVIEW AND COMMENT ON DRAFT OF AMICUS BRIEF (1.0); REVIEW NOTICE FROM COURT, DOWNLOAD FILED AMICUS BRIEF AND FORWARD AMICUS FILING TO CLIENT (0.2).	1.2	\$756.00
2/10/2020	TJO	REVIEW STATE'S OPPOSITION TO SECOND PI APPLICATION.	0.4	\$252.00
2/11/2020	TJO	REVIEW EMAIL FROM COURT (0.1); REVIEW EMAIL FROM J. RUE REGARDING SCHEDULE FOR ORAL ARGUMENT ON MOTIONS (0.1).	0.2	\$126.00
2/12/2020	TJO	EMAIL J. RUE REGARDING PREPARATION OF REPLY BRIEF FOR SECOND PI MOTION AND REVIEW RESPONSIVE EMAIL (0.1); REVIEW AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN PREPARED BY J. RUE (0.2).	0.3	\$189.00
2/13/2020	TJO	REVIEW AND REVISE BRIEF POINT DRAFTED BY C. REISMAN REGARDING REPLY TO POINT II OF DEFENDANTS' OPPOSITION TO SECOND PI MOTION.	2.0	\$1,260.00
2/14/2020	TJO	REVIEW DRAFT REPLY BRIEF (0.2); REVISE BRIEF POINT REGARDING RIPENESS ARGUMENT (1.8); REVIEW FINAL REPLY BRIEF FILED WITH COURT (0.2).	2.2	\$1,386.00
2/17/2020	TJO	EMAIL J. RUE REGARDING MEETING FOR PREPARATION FOR ORAL ARGUMENT.	0.1	\$63.00
2/18/2020	TJO	TRAVEL TO C. REISMAN'S OFFICE FOR PREPARATION SESSION (1.6); MEET WITH C. REISMAN, J. RUE, D. SOUTAR, AND D. GILES TO PREPARE FOR ORAL ARGUMENT (2.1); TRAVEL TO COURT FROM REISMAN'S OFFICE (0.4); ATTEND ORAL ARGUMENT (4.5); RETURN TRAVEL FROM CAMDEN (1.7).	10.3	\$6,489.00
2/19/2020	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STRATEGY FOR SECOND AMENDED COMPLAINT (0.9); BEGIN ANALYZING ADMINISTRATIVE RECORD OF CM'S DUE PROCESS CASE TO DETERMINE ADJOURNMENT HISTORY (3.8).	4.7	\$2,961.00

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2/20/2020	TJO	CONTINUE REVIEW OF ADMIN RECORD OF CM'S DP CASE TO DETERMINE HISTORY OF ADJOURNMENT REQUESTS (2.2); BEGIN DRAFTING ALLEGATIONS RELATING TO CM FOR SECOND AMENDED COMPLAINT (0.9).	3.1	\$1,953.00
2/21/2020	TJO	CONTINUE DRAFTING ALLEGATIONS FOR SECOND AMENDED COMPLAINT THAT RELATE TO C.M. (3.2); REVIEW TRANSCRIPT OF MOTION ARGUMENT (2.8); DRAFT ALLEGATIONS FOR SECOND AMENDED COMPLAINT THAT RELATE TO E.M. (1.4).	7.4	\$4,662.00
2/24/2020	HDR	STUDY BACKGROUNDS AND OPINIONS/DECISIONS OF POTENTIAL SPECIAL MASTERS.	5.6	\$2,968.00
2/24/2020	TJO	REVIEW AND COMMENT ON FIRST DRAFT OF SECOND AMENDED COMPLAINT RECEIVED FROM C. REISMAN (3.2); REVIEW AND COMMENT ON SECOND DRAFT OF SECOND AMENDED COMPLAINT RECEIVED FROM C. REISMAN (2.2).	5.4	\$3,402.00
2/25/2020	HDR	STUDY OPINIONS/DECISIONS OF POTENTIAL SPECIAL MASTERS. PREPARE MEMO ANALYZING AND SUMMARIZING DECISIONS.	6.7	\$3,551.00
2/25/2020	HDR	STUDY BACKGROUNDS AND OPINIONS/DECISIONS OF POTENTIAL SPECIAL MASTERS.	1.5	\$795.00
2/25/2020	TJO	REVIEW AND COMMENT ON LATEST DRAFT OF SECOND AMENDED COMPLAINT (0.3); REVIEW EMAIL FROM C. REISMAN AND RESPOND REGARDING NEED FOR RECORD TO OBTAIN PERMANENT INJUNCTION AND APPOINTMENT OF MONITOR AND DISCOVERY ASSOCIATED WITH SAME (0.2); REVIEW EMAIL FROM J. RUE AND DRAFT RESPONSIVE EMAIL REGARDING STRATEGY FOR OBTAINING RULE 16 CONFERENCE IN THE EVENT THAT STATE FILES RULE 12(B)(6) MOTION TO DISMISS SECOND AMENDED COMPLAINT (0.3).	0.8	\$504.00
2/26/2020	HDR	STUDY OPINIONS/DECISIONS OF POTENTIAL SPECIAL MASTERS. PREPARE MEMO ANALYZING AND SUMMARIZING DECISIONS.	3.5	\$1,855.00

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2/26/2020	TJO	REVIEW AND COMMENT ON REVISED DRAFT OF SECOND AMENDED COMPLAINT (1.8); EXCHANGE EMAILS WITH J. RUE REGARDING REQUESTING PERMANENT INJUNCTION WITH RESPECT TO GUIDELINES AS OPPOSED TO PRELIMINARY INJUNCTION (0.2); TELEPHONE CONFERENCE WITH J. RUE AND C. REISMAN REGARDING SAME (0.2); REVISE LETTER BRIEF IN SUPPORT OF PRELIMINARY AND PERMANENT INJUNCTION (1.7); REVISE PROPOSED FORM OF ORDER FOR PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF (0.7); REVIEW FILED SECOND AMENDED COMPLAINT (0.2); DRAFT EMAIL TO J. RUE REGARDING ADVISING THAT WRONG DRAFT OF SECOND AMENDED COMPLAINT WAS FILED (0.1); REVIEW LETTER BRIEF FILED WITH COURT AND DRAFT EMAIL TO J. RUE REGARDING ADVISING FILED WRONG DRAFT OF LETTER BRIEF (0.1); REVIEW EMAILS FROM D. DWYER AND J. VALVERDE REGARDING COMMENTS ON SECOND AMENDED COMPLAINT (0.1).	5.1	\$3,213.00
2/27/2020	HDR	STUDY OPINIONS/DECISIONS OF POTENTIAL SPECIAL MASTERS. PREPARE MEMO ANALYZING AND SUMMARIZING DECISIONS.	3.8	\$2,014.00
2/27/2020	HDR	MEETING WITH T. OLEARY TO DISCUSS RESEARCH REGARDING POTENTIAL SPECIAL MASTERS.	0.1	\$53.00
2/27/2020	TJO	REVIEW AND REVISE SECOND AMENDED COMPLAINT TO CORRECT ERRORS IN COMPLAINT FILED BY J. RUE (1.9); REVIEW EMAIL FROM J. VALVERDE REGARDING STANDARDS COURT USES TO APPOINT MONITOR AT PRELIMINARY INJUNCTION STAGE (0.1); CONFER WITH JUDGE PISANO REGARDING SAME (0.2); EMAIL J. VALVERDE REGARDING PISANO'S RESPONSE TO J. VALVERDE'S INQUIRY REGARDING STANDARDS USED BY COURT TO APPOINT MONITOR (0.1); EMAIL CO-COUNSEL REGARDING SAME (0.1); REVIEW RESPONSIVE EMAIL FROM J. RUE REGARDING FEDERAL MONITOR AND RESPOND (0.1); EXCHANGE EMAILS WITH K. ROMANO REGARDING EXPECTED APPEAL TO THIRD CIRCUIT (0.2); REVIEW TEXT ORDER FROM COURT (0.1); EMAIL J. RUE REGARDING ERROR IN ORDER SETTING DEADLINE FOR STATE TO FILE LETTER REGARDING STATUS OF IMPLEMENTATION OF GUIDELINES (0.1); TELEPHONE CONFERENCE WITH COURT REGARDING SAME (0.1); REVIEW CORRECTED TEXT ORDER ISSUED BY COURT (0.1); CONFER WITH PARTNER (HDR) REGARDING RESULTS OF DUE DILIGENCE ON POTENTIAL FEDERAL MONITORS (0.4).	3.4	\$2,142.00
2/28/2020	HDR	STUDY OPINIONS/DECISIONS OF POTENTIAL SPECIAL MASTERS. PREPARE MEMO ANALYZING AND SUMMARIZING DECISIONS.	3.3	\$1,749.00

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Date	Person	Description of Services	Hours	Amount
2/28/2020	TJO	REVIEW EMAIL FROM K. SORRANO (0.1); REVIEW EMAIL FROM C. REISMAN REGARDING STATUS OF UPDATE ON POSITION REGARDING GUIDELINES AND RESPOND (0.1); REVIEW CORRESPONDENCE FROM K. SORANNO TO COURT REGARDING EXTENDED TIME TO COMMENT ON GUIDELINES (0.2); EXCHANGE EMAILS AND HAVE TELEPHONE CONFERENCE WITH J. RUE AND C. REISMAN REGARDING SORANNO LETTER (0.5); SECOND TELEPHONE CONFERENCE WITH J. RUE AND C. REISMAN REGARDING SAME (0.4); EXCHANGE EAMILS WITH J. ROSEN VALVERDE REGARDING SAME (0.2); EXCHANGE EMAILS WITH J. RUE REGARDING SAME (0.2).	1.7	\$1,071.00
3/2/2020	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STRATEGY FOR SUPPLEMENTAL BRIEF (0.9); RESEARCH WHETHER CHALLENGE TO GUIDELINES IS STILL RIPE IN LIGHT OF NJDOE'S EXTENSION OF COMMENT PERIOD (7.2).	8.1	\$5,103.00
3/3/2020	TJO	DRAFT BRIEF POINT FOR SUPPLEMENTAL BRIEF FOR SECOND PI MOTION EXPLAINING WHY PI APPLICATION IS STILL RIPE.	6.5	\$4,095.00
3/4/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING FORWARDING PROPOSED ORDER (0.1); REVISE ORDER AND EMAIL TO J. RUE (0.7); EXCHANGE EMAILS WITH J. RUE REGARDING EXPRESSING CONCERNS ABOUT AMBIGUITY IN ORIGINAL DRAFT OF ORDER (0.2); REVIEW BRIEF RECEIVED FROM C. REISMAN AND PLUG IN CITES TO RECORD AND MAKE EDITS TO BRIEF (0.5).	3.5	\$2,205.00
3/5/2020	HDR	PERFORM LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE.	3.6	\$1,908.00
3/5/2020	HDR	MEETING WITH T. O'LEARY REGARDING DELIBERATIVE PROCESS PRIVILEGE ISSUES.	0.1	\$53.00
3/5/2020	TJO	REVIEW EMAIL FROM D. DWYER REGARDING ROTA CERTIFICATION REGARDING MEMO OF AGREEMENT (0.1); REVIEW FILE AND EMAIL CO-COUNSEL REGARDING ROTA COPIED ON NJDOE'S TRANSMITTAL LETTER TO FEDERAL DOE AND ALLOWED MISPRESENTATION TO BE MADE TO FEDERAL DOE (0.3); REVIEW EMAIL FROM J. RUE REQUESTING RESEARCH ASSISTANCE REGARDING DELIBERATIVE PROCESS PRIVILEGE AND DRAFT RESPONSIVE EMAIL (0.2); CONFER WITH PARTNER (HDR) REGARDING SAME (0.2); REVIEW LATEST DRAFT OF SUPPLEMENTAL BRIEF AND FORWARD REVISIONS TO SAME TO CO-COUNSEL (1.6); REVIEW SECOND DRAFT OF BRIEF RECEIVED TODAY (0.3); EMAIL J. RUE REGARDING EXPRESSING CONCERN ABOUT ARGUMENT AND RECOMMENDING ADDITIONAL REVISIONS TO BRIEF (0.6).	3.3	\$2,079.00
3/6/2020	HDR	PERFORM LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE. DRAFT AND REVISE LEGAL MEMORANDUM REGARDING PRIVILEGE.	4.6	\$2,438.00

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Date	Person	Description of Services	Hours	Amount
3/6/2020	TJO	REVIEW AND COMMENT ON SUPPLEMENTAL BRIEF PRIOR TO FILING.	1.1	\$693.00
3/10/2020	HDR	PERFORM LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; DRAFT AND REVISE LEGAL MEMORANDUM REGARDING PRIVILEGE.	6.0	\$3,180.00
3/10/2020	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING AVAILABILITY FOR CONFERENCE CALL (0.1); REVIEW AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN (0.2); PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL REGARDING SCOPE OF CLASS AND ADDING ADDITIONAL PLAINTIFFS (0.3).	0.6	\$378.00
3/11/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	4.5	\$2,385.00
3/11/2020	TJO	REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL REGARDING ADDITIONAL PLAINTIFFS.	0.2	\$126.00
3/12/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	1.3	\$689.00
3/12/2020	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING POSSIBLE NEW ACTION REGARDING JUDGE BASS' FAILURE TO INVESTIGATE ETHICS COMPLAINT INVOLVING 45 DAY RULE VIOLATION (0.7); REVIEW OPPOSITION FILED BY STATE TO SECOND PI APPLICATION (0.4); BEGIN REVIEWING AMICUS SUBMISSION AND CERTIFICATIONS SUBMITTED THEREWITH (0.4).	1.5	\$945.00
3/13/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	0.6	\$318.00
3/13/2020	HDR	Communicate (in firm) MEETING WITH TJO TO DISCUSS DELIBERATIVE PROCESS PRIVILEGE.	0.1	\$53.00
3/13/2020	TJO	REVIEW CERTIFICATIONS FILED BY AMICUS IN RESPONSE TO ORDER TO SHOW CAUSE ENTERED BY COURT (1.1); REVIEW NOTICE FROM COURT REGARDING ADJOURNING HEARING DATE (0.1); REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING COURT ORDER (0.1).	1.3	\$819.00
3/15/2020	TJO	EMAIL CO-COUNSEL REGARDING SETTING UP CONFERENCE CALL.	0.1	\$63.00
3/16/2020	TJO	EXCHANGE MULTIPLE EMAILS WITH CO-COUNSEL REGARDING ADJOURNMENT OF STRATEGY CALL.	0.2	\$126.00

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3/17/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	1.7	\$901.00
3/17/2020	TJO	REVIEW EMAIL FROM D. DWYER REGARDING OPRA RESPONSE FORM NJDOE.	0.1	\$63.00
3/18/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	3.0	\$1,590.00
3/19/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	1.5	\$795.00
3/20/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	1.0	\$530.00
3/20/2020	TJO	REVIEW AND COMMENT ON MEMO REGARDING DELIBERATIVE PROCESS PRIVILEGE (0.9); TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STRATEGY CALL (0.6); TELEPHONE CONFERENCE WITH H. RUIZ REGARDING REVISIONS TO MEMO REGARDING DELIBERATIVE PROCESS PRIVILEGE (0.2).	1.7	\$1,071.00
3/23/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	2.1	\$1,113.00
3/24/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	2.5	\$1,325.00
3/25/2020	HDR	CONTINUE PERFORMING LEGAL RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE; CONTINUE DRAFTING AND REVISING LEGAL MEMORANDUM REGARDING PRIVILEGE.	5.5	\$2,915.00
3/25/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING LETTER TO JUDGE HILLMAN REGARDING SLOWDOWN AT OAL AND STATUS OF GUIDELINES FROM NJDOE AND RESPOND (0.1); REVIEW EMAIL FROM C. REISMAN REGARDING SAME (0.1).	0.2	\$126.00
3/26/2020	HDR	RESEARCH ATTEND TO RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE AND WAIVER ISSUES. COLLECT AND REVIEW DECISIONAL AUTHORITY.	0.5	\$265.00

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Date	Person	Description of Services	Hours	Amount
3/26/2020	TJO	REVIEW DRAFT MEMO REGARDING DELIBERATIVE PROCESS PRIVILEGE (0.9); RESEARCH REGARDING WAIVER OF PRIVILEGE BY PUTTING "IN ISSUE" (0.3); EMAIL PARTNER (HDR) REGARDING REVISIONS TO MEMO REGARDING WAIVER OF PRIVILEGE BY PUTTING IN ISSUE (0.1).	1.3	\$819.00
3/27/2020	HDR	CONDUCT RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE AND WAIVER ISSUES.	3.0	\$1,590.00
3/27/2020	TJO	REVIEW STATE'S MOTION TO DISMISS (0.8); EMAIL CO-COUNSEL REGARDING BRIEFING ON OPPOSITION (0.1).	0.9	\$567.00
3/30/2020	HDR	CONDUCT RESEARCH REGARDING THE DELIBERATIVE PROCESS PRIVILEGE AND WAIVER ISSUES. EDIT AND REVISE MEMO ON DELIBERATIVE PROCESS PRIVILEGE.	5.0	\$2,650.00
3/30/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING PROPOSED LETTER TO DAG SORRANO AND RESPOND.	0.1	\$63.00
3/31/2020	TJO	REVIEW EMAIL FROM JUDGE HILLMAN'S LAW CLERK (0.1); REVIEW CORRESPONDENCE FROM DAG SARRANO (0.1).	0.2	\$126.00
4/1/2020	HDR	DRAFT PROPOSED JOINT DISCOVERY PLAN.	1.0	\$530.00
4/1/2020	HDR	TELCON WITH T. OLEARY TO DISCUSS STRATEGY. CORRESPOND WITH T. OLEARY REGARDING DISCOVERY PLAN.	0.2	\$106.00
4/1/2020	HDR	FINALIZE MEMO ON DELIBERATIVE PROCESS PRIVILEGE AND WAIVER ISSUES. COLLECT CASES DISCUSSED IN MEMO.	2.0	\$1,060.00
4/1/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING POTENTIAL MOTION TO COMPEL DISCOVERY AND DRAFT RESPONSIVE EMAIL (0.2); EMAIL J. RUE REGARDING AVAILABILITY FOR CONFERENCE CALL WITH CO-COUNSEL (0.1); REVIEW AND COMMENT ON MEMO REGARDING DELIBERATIVE PROCESS PRIVILEGE (1.2); TELEPHONE CONFERENCE WITH PARTNER (HDR) REGARDING PREPARATION OF DISCOVERY PLAN (0.2).	1.7	\$1,071.00
4/2/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING SCHEDULING CONFERENCE CALL.	0.1	\$63.00
4/3/2020	TJO	PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL REGARDING INITIAL DISCOVERY.	0.7	\$441.00
4/6/2020	HDR	DRAFT EDIT/REVISE DRAFT JOINT DISCOVERY PLAN.	3.0	\$1,590.00
4/7/2020	HDR	CORRESPOND WITH TJO REGARDING STATUS OF CASE. CORRESPOND WITH CO-COUNSEL REGARDING RESEARCH MEMOS ON SPECIAL MASTER AND DELIBERATIVE PROCESS PRIVILEGE.	0.1	\$53.00
4/8/2020	TJO	REVIEW CORRESPONDENCE FROM A. BLENNER TO COURT REGARDING REQUEST FOR DISCOVERY.	0.1	\$63.00

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Date	Person	Description of Services	Hours	Amount
4/9/2020	TJO	REVIEW DRAFT LETTER BRIEF FROM J. RUE (0.1); REVISE LETTER BRIEF (1.1); REVIEW EMAIL FROM K. SORRANO (0.1).	1.3	\$819.00
4/14/2020	TJO	DRAFT EMAIL TO J. RUE REGARDING COURT APPEARANCE BEFORE JUDGE HILLMAN (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1).	0.2	\$126.00
4/15/2020	TJO	REVIEW NOTICE FROM COURT REGARDING RESCHEDULING COURT APPEARANCE.	0.1	\$63.00
4/27/2020	TJO	REVIEW STATE'S REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS SECOND AMENDED COMPLAINT.	0.2	\$126.00
5/6/2020	TJO	REVIEW AND COMMENT ON DRAFT LETTER FROM J. RUE TO DAG SORANNO.	0.1	\$63.00
5/12/2020	TJO	EMAIL CO-COUNSEL TO ADVISE THAT REPOLLET HAD BEEN APPOINTED PRESIDENT OF KEAN UNIVERSITY.	0.1	\$63.00
5/22/2020	TJO	ANALYZE DECISION ON MOTION TO DISMISS (0.6); DRAFT EMAIL TO CO-COUNSEL REGARDING SAME (0.1); DRAFT EMAIL TO CLIENTS REGARDING ADVISING OF DECISION (0.1); REVIEW LETTER FROM DAG BLENNER TO COURT REGARDING STATUS OF GUIDELINES FOR DP HEARINGS (0.1); EMAIL J. RUE REGARDING BLENNER LETTER (0.1); RESPOND TO J. RUE EMAIL REGARDING AVAILABILITY FOR CONFERENCE CALL WITH CO-COUNSEL (0.1).	1.1	\$693.00
5/26/2020	TJO	REVIEW TEXT ORDER FROM COURT REGARDING CONVERTING HEARING INTO STATUS CONFERENCE (0.1); REVIEW EMAIL FROM COURT REGARDING DIAL INFO FOR CALL WITH COURT (0.1); REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING AVAILABILITY FOR CALL (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING RESOURCES FOR DISCOVERY (0.2); TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING STRATEGY FOR CONFERENCE WITH JUDGE HILLMAN (0.7); REVIEW AND COMMENT ON DRAFT AGENDA J. RUE CIRCULATED FOR DISCUSSIONS WITH DAG'S OFFICE (0.2); REVIEW AND COMMENT ON DRAFT DISCOVERY AGENDA CIRCULATED BY C. REISMAN (0.1); REVIEW EMAIL FROM J. RUE REGARDING STRATEGY FOR NEGOTIATION WITH DAG'S OFFICE AND RESPOND (0.1); DRAFT EMAIL TO CO-COUNSEL REGARDING COMP ED CLAIM FOR CLIENTS WHO HAVE EXHAUSTED ADMINISTRATIVE REMEDIES (0.3).	1.9	\$1,197.00
5/27/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING CONVERSATION WITH SERRANO AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING STRATEGY REGARDING SECOND PI MOTION (0.1); REVIEW DOCUMENTS FORWARDED BY D. DWYER REGARDING STATE'S RESPONSE TO OPRA REQUEST ON COMMENTS ON DRAFT GUIDELINES FOR DUE PROCESS HEARINGS (0.2); REVIEW JOINT LETTER TO JUDGE HILLMAN THAT WAS FILED WITH COURT (0.1).	0.5	\$315.00

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Date	Person	Description of Services	Hours	Amount
5/28/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING NEED TO REFILE CLASS CERTIFICATION MOTION AND RESPOND (0.1); REVIEW EMAIL FROM C. REISMAN REGARDING COMP ED CLAIM FOR PLAINTIFFS WHO HAVE EXHAUSTED (0.1); DRAFT RESPONSIVE EMAIL REGARDING SAME (0.4); REVIEW LETTER FILED BY J. RUE WITH COURT (0.1).	0.7	\$441.00
5/29/2020	TJO	REVIEW LETTER FROM DAG SORRANO TO JUDGE HILLMAN.	0.1	\$63.00
6/1/2020	TJO	REVIEW DEFENDANTS' APPLICATION FOR A CLERK'S EXTENSION.	0.1	\$63.00
6/2/2020	HDR	REVIEW RECEIVE/REVIEW ORDER OF COURT GRANTING DEFENDANTS EXTENSION OF TIME TO ANSWER.	0.1	\$53.00
6/4/2020	TJO	REVIEW DRAFT LETTER PREPARED BY J. RUE TO JUDGE HILMAN REGARDING BASS LETTER (0.2); TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING SAME (0.5).	0.7	\$441.00
6/5/2020	TJO	REVIEW AND COMMENT ON DRAFT BRIEF IN SUPPORT OF MOTION TO CERTIFY CLASS.	0.7	\$441.00
6/7/2020	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND.	0.1	\$63.00
6/8/2020	TJO	REVIEW NOTICE FROM COURT REGARDING RESETTING DATES FOR MOTION.	0.1	\$63.00
6/9/2020	HDR	CORRESPOND WITH TEAM REGARDING RESEARCH REGARDING LITIGATION CONTROL GROUP.	0.1	\$53.00
6/9/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING TESTIMONY FROM WORTHINGTON (0.1); DRAFT EMAIL TO CO-COUNSEL REGARDING CONCERN THAT WORTHINGTON MAY BE IN LITIGATION CONTROL GROUP (0.1).	0.2	\$126.00
6/10/2020	HDR	PERFORM PRELIMINARY RESEARCH REGARDING LITIGATION CONTROL GROUP.	0.3	\$159.00
6/11/2020	TJO	REVIEW ORDER FROM COURT REGARDING DENYING FIRST MOTION TO CERTIFY CLASS AS MOOT.	0.1	\$63.00
6/12/2020	TJO	REVIEW DRAFT LETTER TO JUDGE HILLMAN PREPARED BY J. VALVERDE ROSEN AND DRAFT EMAIL TO J. VALVERDE ROSEN REGARDING COMMENTS ON LETTER (0.2); REVIEW EMAIL FROM J. RUE REGARDING ADDITIONAL COMMENTS ON LETTER TO JUDGE HILLMAN (0.1); REVIEW REVISED LETTER BY J. VALVERDE ROSEN AND COMMENT ON SAME (0.1).	0.4	\$252.00
6/17/2020	HDR	ORDER OF COURT REGARDING ORDER TO SHOW CAUSE REGARDING CONSOLIDATION.	0.1	\$53.00
6/17/2020	TJO	REVIEW TEXT ORDER FROM COURT REGARDING OTSC AS TO WHY CASE SHOULD NOT BE CONSOLIDATED.	0.1	\$63.00
6/18/2020	TJO	REVIEW AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN REGARDING OTSC AS TO WHY CASES SHOULD NOT BE CONSOLIDATED.	0.1	\$63.00

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6/22/2020	HDR	RECEIVE/REVIEW DEFENDANTS' OPPOSITION TO MOTION TO CERTIFY CLASS.	0.1	\$53.00
6/22/2020	HDR	REVIEW RECEIVE/REVIEW AMICUS SUBMISSION FILED WITH THE COURT.	0.1	\$53.00
6/22/2020	TJO	DRAFT EMAIL TO J. RUE REGARDING CONSOLIDATION APPLICATION (0.4); REVIEW LETTER FILED BY NJSEP (0.1); REVIEW ORDER ENTERED BY COURT (0.1); REVIEW STATE'S ANSWER TO SECOND AMENDED COMPLAINT (0.1).	0.7	\$441.00
6/23/2020	HDR	REVIEW STUDY MEMO OF S. KRITZMACHER AND AUTHORITY REGARDING LITIGATION CONTROL.	1.0	\$530.00
6/23/2020	TJO	REVIEW ESI PROTOCOL AND FORWARD TO C. REISMAN.	0.1	\$63.00
6/24/2020	HDR	COMMUNICATE WITH TJO REGARDING STRATEGY REGARDING EDISCOVERY PROTOCOL.	0.1	\$53.00
6/24/2020	HDR	CORRESPOND WITH TJO REGARDING STRATEGY REGARDING RULE 16 CONFERENCE ON 7.30.20.	0.1	\$53.00
6/24/2020	HDR	PARTICIPATE IN MEETING WITH TJO AND SK REGARDING STRATEGY REGARDING LITIGATION CONTROL GROUP ISSUE. COMMUNICATE WITH SK REGARDING STRATEGY REGARDING LITIGATION CONTROL GROUP ISSUE.	0.5	\$265.00
6/24/2020	TJO	REVIEW DRAFT DISCOVERY PLAN (0.2); PARTICIPATE IN CALL WITH CO-COUNSEL REGARDING DISCOVERY PLAN (1.0); EXCHANGE EMAILS WITH J. RUE REGARDING MOTION FOR EXPEDITED TRIAL (0.1).	1.3	\$819.00
6/25/2020	HDR	REVIEW CORRESPONDENCE FROM PLAINTIFFS TO DEFENDANTS REGARDING EXPEDITED DISCOVERY.	0.1	\$53.00
6/25/2020	TJO	PREPARE FOR CALL WITH J. RUE (0.4); TELEPHONE CONFERENCE WITH J. RUE (0.5); CONFER WITH PARTNER (HDR) REGARDING SUPERVISING DISCOVERY (0.3); EXCHANGE EMAILS WITH J. RUE AND HDR REGARDING SAME (0.1).	1.2	\$756.00
6/26/2020	HDR	PREPARE DRAFT STIPULATED ESI PROTOCOL.	1.0	\$530.00
6/26/2020	HDR	REVIEW RESEARCH REGARDING LITIGATION CONTROL GROUP.	0.8	\$424.00
6/26/2020	HDR	REVIEW RECEIVE/REVIEW CORRESP. FROM THE PARTIES TO THE COURT REGARDING RULE 16 CONFERENCE.	0.2	\$106.00
6/26/2020	HDR	REVIEW STUDY CORRESPONDENCE FROM THE PARTIES REGARDING RULE 16 CONFERENCE.	0.1	\$53.00
6/26/2020	HDR	REVIEW/ANALYZE OPPOSITION TO 2ND MOTION FOR CLASS CERTIF.	0.5	\$265.00
6/26/2020	TJO	REVIEW AND COMMENT ON LETTER TO JUDGE HILLMAN (0.2); REVIEW DRAFT MEMO REGARDING LITIGATION CONTROL GROUP (0.2); TELEPHONE CONFERENCE WITH SUMMER ASSOCIATE REGARDING SAME (0.2).	0.6	\$378.00

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6/29/2020	HDR	REVIEW RECEIVE/REVIEW REPLY BRIEF ON MOTION TO CERTIFY CLASS.	0.1	\$53.00
6/29/2020	HDR	REVIEW/ANALYZE DEFENDANTS ANSWER TO COMPLAINT.	0.5	\$265.00
6/29/2020	HDR	CORRESPOND WITH SUSAN K. AND TOM O. REGARDING LITIGATION CONTROL GROUP RESEARCH.	0.1	\$53.00
6/29/2020	TJO	REVIEW AND COMMENT ON REPLY BRIEF (0.2); REVIEW AND COMMENT ON REVISED AGREEMENT BETWEEN COUNSEL (0.2); REVIEW EMAILS FROM R. THURSTON (0.1).	0.5	\$315.00
6/30/2020	HDR	PREPARE DRAFT AND REVISE ESI STIPULATION.	2.2	\$1,166.00
6/30/2020	HDR	REVIEW RESEARCH REGARDING LITIGATION CONTROL GROUP ISSUES W/R/T MR. WORTHINGTON.	0.3	\$159.00
6/30/2020	HDR	RECEIVE/REVIEW 6.30.20 CORRESPONDENCE FILED BY DEFENDANTS REGARDING RULE 16 CONFERENCE.	0.1	\$53.00
6/30/2020	HDR	REVIEW ODER OF COURT REGARDING RULE 16 CONFERENCE.	0.1	\$53.00
6/30/2020	HDR	DRAFT/REVISE STIPULATED ESI PROTOCOL.	2.0	\$1,060.00
6/30/2020	TJO	REVIEW CORRESPONDENCE FILED BY DEFENDANTS WITH COURT IN SUPPORT OF ADJOURNMENT REQEUST (0.1); REVIEW EMAIL FROM J. RUE AND RESPOND ADVISING NOT TO RESPOND TO STATE'S LETTER (0.1); TELEPHONE CONFERENCE WITH PARTNER (HDR) AND J. RUE (0.6); REVIEW OPINION AND ORDER ENTERED IN J.A. CASE FOR IMPACT ON C.P. CASE (0.2).	1.0	\$630.00
7/1/2020	HDR	DRAFT/REVISE STIPULATED ESI PROTOCOL.	2.3	\$1,219.00
7/1/2020	HDR	RECEIVE/REVIEW PRO HAC VICE MOTION FILED BY J. GRAN.	0.1	\$53.00
7/1/2020	HDR	DRAFT/REVISE PROPOSED ESI PROTOCOL. COMMUNICATE WITH CO-COUNSEL REGARDING PROPOSED ESI PROTOCOL.	2.3	\$1,219.00
7/1/2020	TJO	TELEPHONE CONFERENCE WITH PARTNER (HDR) REGARDING SUPERVISION OF DISCOVERY (0.4); RESPOND TO DOODLE POLE REGARDING CONFERENCE CALL (0.1); REVIEW AND REVISE MEMO REGARDING LITIGATION CONTROL GROUP (0.2); EMAIL MEMO REGARDING LITIGATION CONTROL GROUP TO ALL COUNSEL (0.1); REVIEW AND REVISE ESI STIPULATION (0.3); EMAIL STIPULATION TO C. REISMAN (0.1).	1.1	\$693.00
7/2/2020	HDR	REVIEW AMICUS SUBMISSION OF 6.22.20 FILED WITH THE COURT BY RUTGERS LAW CLINIC ET AL.	0.3	\$159.00
7/2/2020	HDR	REVIEW CORRESPONDENCE FROM PLAINTIFFS TO COURT REGARDING CONSOLIDATION.	0.1	\$53.00
7/2/2020	HDR	REVIEW DOCKET NOTICES REGARDING PRO HAC APPLICATION FILED BY J. GRAN.	0.1	\$53.00

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7/2/2020	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING CLASS ACTION FILED BY THURSTON (0.4); REVIEW AND COMMENT ON AMENDED AGREEMENT BETWEEN CO-COUNSEL (0.2).	0.6	\$378.00
7/4/2020	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING POSSIBLE TRO APPLICATION REGARDING OAL'S FAILURE TO HOLD HEARINGS.	0.2	\$126.00
7/6/2020	HDR	REVIEW/ANALYZE DEFENDANTS' JULY 2, 2020 RESPONSE TO ORDER TO SHOW CAUSE.	0.5	\$265.00
7/7/2020	HDR	STUDY COURT'S RULE 16 ORDER. TELCON WITH TJO REGARDING STRATEGY REGARDING DISCOVERY.	0.3	\$159.00
7/9/2020	HDR	REVIEW/ANALYZE DRAFT RULE 26 DISCLOSURES. DEVELOP STRATEGY.	0.5	\$265.00
7/9/2020	TJO	REVIEW EMAIL FROM J. RUE, EXECUTE AMENDED AGREEMENT BETWEEN COUNSEL AND FORWARD TO RUE.	0.1	\$63.00
7/10/2020	HDR	CONDUCT RESEARCH REGARDING EXEMPLAR RULE 26 INITIAL DISCLOSURES. RESEARCH DEVELOP STRATEGY REGARDING PROPOSED RULE 26 DISCLOSURES.	0.6	\$318.00
7/13/2020	HDR	DEVELOP STRATEGY REGARDING DISCOVERY PLAN AND DEPOSITION ISSUES.	0.1	\$53.00
7/15/2020	TJO	REVIEW NOTICE OF APPEARANCE FILED BY R. THURSTON.	0.1	\$63.00
7/20/2020	TJO	REVIEW CORRESPONDENCE FROM DAG BLENNER TO COURT REGARDING PRO HAC VICE APPLICATION.	0.1	\$63.00
7/22/2020	TJO	REVIEW DOCUMENTS OBTAINED BY D. DWYER THROUGH OPRA (0.3); REVIEW EMAIL EXCHANGE BETWEEN J. RUE AND R. THURSTON REGARDING RULE 16 CONFERENCE AND DISCOVERY (0.1).	0.4	\$252.00
7/24/2020	HDR	CORRESPOND WITH TJO REGARDING STATUS OF MATTER.	0.1	\$53.00
7/26/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING COMPLAINT BY THURSTON AND WHETHER IT SHOULD BE A RELATED CASE TO CLASS ACTION.	0.1	\$63.00
7/28/2020	TJO	REVIEW EMAILS FROM R. THURSTON AND D. DWYER REGARDING FOIA RESPONSE.	0.1	\$63.00
7/29/2020	TJO	EMAIL J. RUE REGARDING BILLING FOR CASE.	0.1	\$63.00
8/12/2020	TJO	REVIEW TEXT ORDER FROM COURT REGARDING SCHEDULING ADDITIONAL BRIEFING ON EXPEDITED TRIAL.	0.1	\$63.00
8/14/2020	HDR	RECEIVE/REVIEW PRO HAC VICE ADMISSION ORDER W/R/T PRO HAC ADMISSION OF J. GRAN.	0.1	\$53.00
8/25/2020	TJO	EMAIL J. RUE REGARDING PREPARATION OF BRIEF FOR OTSC THAT IS DUE ON 9/3.	0.1	\$63.00
8/30/2020	TJO	REVIEW AND COMMENT ON DRAFT BRIEF REGARDING EXPEDITED TRIAL.	0.2	\$126.00

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8/31/2020	HDR	RECEIVE AND REVIEW DRAFT BRIEF REGARDING 65a2 RELIEF.	0.1	\$53.00
9/1/2020	HDR	RECEIVE/REVIEW COMMENTS FROM TEAM REGARDING RULE 65A2 BRIEF.	0.1	\$53.00
9/1/2020	HDR	REVIEW PLAINTIFF'S DRAFT RULE 65A BRIEF.	0.3	\$159.00
9/3/2020	TJO	REVIEW BRIEF FILED WITH COURT REGARDING CONSOLIDATION OF PI MOTION WITH EXPEDITED TRIAL.	0.2	\$126.00
9/17/2020	HDR	RECEIVE/REVIEW PRO HAC VICE APPLICATION FILED BY DEFENDANTS.	0.1	\$53.00
9/17/2020	TJO	REVIEW NOTICE RECEIVED FROM COURT REGARDING KALINSKY NOTICE OF APPEARANCE.	0.1	\$63.00
9/18/2020	HDR	RECEIVE AND REVIEW OPPOSITION FILED BY DEFENDANTS REGARDING CONSOLIDATION.	0.1	\$53.00
9/18/2020	TJO	REVIEW EMAILS FROM D. DWYER REGARDING NJDOE'S RESPONSE TO OPRA REQUEST.	0.1	\$63.00
9/21/2020	TJO	REVIEW STATE'S BRIEF IN OPPOSITION TO CONSOLIDATION OF PI MOTION WITH EXPEDITED TRIAL.	0.5	\$315.00
9/22/2020	TJO	DRAFT REPLY BRIEF IN SUPPORT OF MOTION TO CONSOLIDATE PI APPLICATION WITH EXPEDITED TRIAL.	7.4	\$4,662.00
9/23/2020	HDR	STUDY ELECTRONIC NOTICE REGARDING WITHDRAWAL OF COUNSEL FOR DEFENDANT.	0.1	\$53.00
9/23/2020	TJO	REVISE REPLY BRIEF TO REFLECT J. WASSERMAN'S COMMENTS.	0.1	\$63.00
9/24/2020	TJO	PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL (0.5); REVISE AND FINALIZE REPLY BRIEF (0.4); ELECTRONICALLY FILE REPLY BRIEF (0.1); EMAIL FILED REPLY BRIEF TO CO-COUNSEL (0.1).	1.1	\$693.00
10/5/2020	TJO	REVIEW EMAIL FROM J. RUE.	0.1	\$63.00
10/6/2020	TJO	EMAIL J. RUE FORWARDING BILLING PROFORMA THROUGH SEPTEMBER 2020.	0.1	\$63.00
10/16/2020	TJO	REVIEW LATEST DRAFT OF PROPOSED AMENDED COMPLAINT (0.9); DRAFT EMAIL TO J. RUE AND ALL COUNSEL REGARDING COMMENTS ON DRAFT COMPLAINT (0.6).	1.5	\$945.00
10/19/2020	TJO	RESPOND TO POLL BY J. RUE REGARDING AVAILABILITY FOR CONFERENCE CALL.	0.1	\$63.00
10/20/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING DECISION NOT TO FILE AMENDED COMPLAINT (0.1); REVIEW SECOND AMENDED COMPLAINT TO ENSURE PROPOSED CLAIMS WERE ALREADY IN CP CASE AND EMAIL J. RUE REGARDING SAME (0.2).	0.3	\$189.00
11/5/2020	HDR	INTERNAL CORRESPONDENCE REGARDING STATUS OF MATTERS.	0.1	\$53.00

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11/6/2020	HDR	INTERNAL CORRESPONDENCE REGARDING STATUS OF CASE.	0.1	\$53.00
11/24/2020	HDR	REVIEW AND ANALYZE OPINION AND ORDER OF JUDGE HILLMAN.	0.3	\$159.00
11/25/2020	HDR	INTERNAL COMMUNICATION REGARDING 11.25.20 RULING OF THE COURT.	0.1	\$53.00
11/25/2020	TJO	RESPOND TO EMAIL FROM J. RUE REGARDING SCHEDULING CONFERENCE CALL REGARDING JUDGE'S RECENT ORDER AND OPINION.	0.1	\$63.00
11/30/2020	HDR	REVIEW CORRESPONDENCE WITH DEFENDANTS W/R/T PROPOSED JOINT DISCOVERY PLAN.	0.1	\$53.00
11/30/2020	TJO	PARTICIPATE IN CONFERENCE CALL WITH J. RUE, D. SOUTAR, AND C. REISMAN REGARDING JUDGE HILLMAN'S ORDER AND OPINION.	0.5	\$315.00
12/1/2020	HDR	CORRESPOND WITH CO-COUNSEL AND ADVERSARY REGARDING PROPOSED MEET & CONFER.	0.2	\$106.00
12/1/2020	HDR	REVIEW AND ANALYZE DEFENDANTS EDITS TO JOINT DISCOVERY PLAN. CORRESPOND WITH CO COUNSEL AND INTERNAL CORRESPONDENCE REGARDING SAME. DEVELOP STRATEGY.	0.5	\$265.00
12/1/2020	TJO	REVIEW AND COMMENT ON DRAFT CONSENT ORDER (0.2); REVIEW EMAILS EXCHANGED BETWEEN J. RUE AND K. SORRANO REGARDING DISCOVERY ISSUES (0.1).	0.3	\$189.00
12/2/2020	HDR	CORRESPOND WITH J. RUE REGARDING PROPOSED LETTER TO JUDGE WILLIAMS, RECEIVE/REVIEW FINAL/FILED LETTER TO J. WILLIAM REGARDING RULE 16 CONF.	0.1	\$53.00
12/2/2020	HDR	CORRESPOND WITH CO-COUNSEL REGARDING PLAINTIFFS' INITIAL DISCLOSURES. REVIEW LOCAL RULES REGARDING RULE 26 DISCLOSURES.	0.3	\$159.00
12/2/2020	HDR	REVIEW/REVISE DRAFT CORRESPONDENCE TO JUDGE WILLIAMS REGARDING RULE 16 CONFERENCE. INTERNAL CORRESPONDENCE AND CORRESPOND WITH CO COUNSEL REGARDING SAME. DEVELOP STRATEGY.	0.8	\$424.00
12/2/2020	HDR	REVIEW RECEIVE/REVIEW DEFENDANT'S INITIAL RULE 26 DISCLOSURES.	0.1	\$53.00
12/2/2020	TJO	REVIEW EMAIL FROM J. RUE REGARDING DRAFT LETTER TO JUDGE WILLIAMS (0.1); DRAFT EMAIL TO J. RUE REGARDING ADVISING OF CONCERNS ABOUT TONE OF LETTER (0.1); REVIEW AND EDIT REVISED DRAFT OF LETTER PREPARED BY PARTNER (HDR) (0.1); REVIEW VERSION OF LETTER FILED BY J. RUE AFTER BEING FILED WITH THE COURT (0.1).	0.4	\$252.00
12/3/2020	HDR	RECEIVE/REVIEW ORDER OF COURT SETTING RULE 16 CONFERENCE.	0.1	\$53.00

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12/3/2020	HDR	CORRESPOND WITH CO COUNSEL REGARDING RULE 16 DISCLOSURES. DEVELOP STRATEGY. DRAFT AND REVISE RULE 16 DISCLOSURES.	2.9	\$1,537.00
12/3/2020	HDR	REVIEW/PREPARE JOINT DISCOVERY PLAN. CORRESPOND WITH CO COUNSEL REGARDING SAME. DEVELOP STRATEGY. CORRESPOND WITH ADVERSARY REGARDING JOINT DISCOVERY PLAN.	1.1	\$583.00
12/3/2020	HDR	PREPARE ESI STIPULATION. CORRESPOND WITH CO COUNSEL REGARDING ESI PROTOCOL. DEVELOP STRATEGY.	0.8	\$424.00
12/3/2020	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING PREPARATION OF RULE 26 DISCLOSURES.	0.2	\$126.00
12/4/2020	HDR	PREPARE DRAFT AND REVISE PLAINTIFFS INITIAL RULE 26 DISCLOSES.	2.3	\$1,219.00
12/4/2020	HDR	IDEA FUNDING CORRESPONDENCE TO NJDOE. CORRESPOND WITH CO-COUNSEL REGARDING SAME.	0.3	\$159.00
12/4/2020	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING PREPARATION OF RULE 26 DISCLOSURES.	0.1	\$63.00
12/7/2020	HDR	INTERNAL CORRESPONDENCE REGARDING RULE 26 DISCLOSURES.	0.1	\$53.00
12/7/2020	HDR	REVIEW CORRESPONDENCE REGARDING PLAINTIFFS' RULE 26 DISCLOSURES.	0.1	\$53.00
12/7/2020	TJO	REVIEW AND REVISE DRAFT OF RULE 26 DISCLOSURES (0.3); EMAIL DRAFT OF DISCLOSURES TO CO-COUNSEL (0.1).	0.4	\$252.00
12/8/2020	HDR	STUDY DOCKET AND RULE 16 ORDER ISSUED BY COURT. CORRESPOND WITH CO COUNSEL REGARDING RULE 16 CONFERENCE. DEVELOP STRATEGY. CORRESPOND WITH CO COUNSEL REGARDING DRAFT RULE 26 DISCLOSURES.	0.5	\$265.00
12/8/2020	TJO	DRAFT EMAIL TO J. RUE REGARDING RULE 16 CONFERENCE.	0.1	\$63.00
12/9/2020	HDR	CORRESPOND WITH CO COUNSEL REGARDING RULE 16 CONFERENCE AND RULE 26 DISCLOSURES. DEVELOP STRATEGY REGARDING SAME.	0.5	\$265.00
12/9/2020	TJO	EMAIL J. RUE REGARDING STATUS OF STATE'S RESPONSE FOR REQUEST FOR DISCOVERY PLAN PRIOR TO RULE 16 CONFERENCE.	0.1	\$63.00
12/11/2020	HDR	CORRESPOND WITH ADVERSARY AND CO COUNSEL REGARDING PROPOSED MEET & CONFER.	0.2	\$106.00
12/11/2020	HDR	ATTEND TO PROPOSED JOINT DISCOVERY PLAN.	0.3	\$159.00
12/11/2020	HDR	CORRESPOND WITH CO COUNSEL REGARDING EXPEDITED DISCOVERY, RULE 26 DISCLOSURES AND DISCOVERY STRATEGY.	0.5	\$265.00

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12/11/2020	TJO	REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL REGARDING SCHEDULING CALL TO DISCUSS STATE'S RESPONSES TO DISCOVERY PLAN (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING DISCOVERY STRATEGY (0.3).	0.4	\$252.00
12/12/2020	HDR	PREPARE EDIT/REVISE DRAFT ESI PROTOCOL.	2.0	\$1,060.00
12/12/2020	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING DISCOVERY PLAN AND RULE 26 DISCLOSURES (2.0); REVIEW AND COMMENT ON ESI PROTOCOL (0.2); REVISE RULE 26 DISCLOSURES (1.1); REVIEW AND COMMENT ON DRAFT DISCOVERY PLAN (0.3); EMAIL J. RUE REGARDING EXPRESSING CONCERN ABOUT BIFURACTION PROVISION IN DISCOVERY PLAN (0.2).	3.8	\$2,394.00
12/13/2020	HDR	REVIEW AND CORRESPOND WITH CO COUNSEL REGARDING JOINT DISCOVERY PLAN. DEVELOP STRATEGY REGARDING SAME.	0.8	\$424.00
12/13/2020	HDR	CORRESPOND WITH CO COUNSEL RELATING TO ISSUES SURROUNDING BIFURCATION. DEVELOP STRATEGY.	0.1	\$53.00
12/13/2020	TJO	ZOOM CONFERENCE WITH J. RUE, D. GILES AND PARTNER (HDR) REGARDING BIFURCATION AND DISCOVERY PLAN.	0.4	\$252.00
12/14/2020	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL AND ADVERSARY REGARDING R 26 CONFERENCE.	0.1	\$53.00
12/14/2020	HDR	REVIEW AND ANALYZE DRAFT JDP, ESI PROTOCOL AND DCO SERVED ON DEFENDANTS.	0.3	\$159.00
12/14/2020	HDR	PREPARE DRAFT AND REVISE ESI PROTOCOL. INTERNAL CORRESPONDENCE REGARDING SAME.	3.0	\$1,590.00
12/14/2020	HDR	CORRESPOND WITH CO COUNSEL REGARDING ESI PROTOCOL STRATEGY AND EXPERT WITNESSES. DEVELOP STRATEGY.	0.2	\$106.00
12/14/2020	TJO	TELEPHONE CONFERENCE WITH J. RUE REGARDING PREPARATION FOR CALL WITH K. SORRANO (0.1); TELEPHONE CONFERENCE WITH J. RUE AND DAG SORRANO REGARDING MEET AND CONFER ON DISCOVERY PLAN (0.7); TELEPHONE CONFERENCE WITH J. RUE REGARDING CALL WITH SORRANO (0.1).	0.9	\$567.00
12/15/2020	HDR	CORRESPOND WITH CO-COUNSEL REGARDING DEFENDANTS EDITS TO DRAFT JOINT DISCOVERY PLAN. DEVELOP STRATEGY.	0.3	\$159.00
12/15/2020	HDR	CORRESPOND WITH CO COUNSEL TO DEVELOP DISCOVERY AND LITIGATION STRATEGY.	0.5	\$265.00
12/15/2020	HDR	CORRESPOND WITH CO COUNSEL TO DEVELOP STRATEGY REGARDING EXPEDITED DISCOVERY.	0.1	\$53.00
12/15/2020	HDR	CORRESPOND WITH DEFENDANTS REGARDING RULES 26 DISCLOSURES.	0.1	\$53.00

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12/15/2020	TJO	REVIEW EMAILS FROM R. THURSTON.	0.1	\$63.00
12/16/2020	HDR	CORRESPOND WITH CO-COUNSEL AND ADVERSARY REGARDING PROPOSED JOINT DISCOVERY PLAN.	0.5	\$265.00
12/16/2020	HDR	INTERNAL CORRESPONDENCE REGARDING RULE 16 DISCLOSURES AND JOINT DISCOVERY PLAN. DEVELOP STRATEGY.	0.5	\$265.00
12/16/2020	TJO	REVIEW STATE'S EDITS TO DISCOVERY PLAN (0.1); REVIEW MULTIPLE EMAILS EXCHANGED BETWEEN J. RUE AND K. SORRANO REGARDING DISCOVERY PLAN (0.2).	0.3	\$189.00
12/17/2020	HDR	PREPARE DRAFT AND REVISE FIRST SET OF INTERROGS. TO DEFENDANTS.	0.5	\$265.00
12/17/2020	HDR	Communicate (other external) CORRESPOND WITH CO-COUNSEL TO DEVELOP STRATEGY REGARDING RULE 16 CONFERENCE.	0.3	\$159.00
12/17/2020	HDR	RECEIVE/REVIEW CORRESPONDENCE FROM COURT CONFIRMING RECEIPT OF JOINT DISCOVERY PLAN. CORRESPOND WITH CO-COUNSEL TO DEVELOP STRATEGY,.	0.1	\$53.00
12/17/2020	TJO	TELEPHONE CONFERENCE WITH J. RUE AND C. REISMAN REGARDING STRATEGY FOR CALL WITH JUDGE WILLIAMS (0.1); PARTICIPATE IN TELEPHONIC RULE 16 CONFERENCE (1.1); ATTEND ZOOM CONFERENCE WITH CO-COUNSEL REGARDING DRAFTING OF DISCOVERY FOLLOWING CONFERENCE (0.3).	1.5	\$945.00
12/18/2020	HDR	RECEIVE & REVIEW SCHEDULING ORDER ENTERED BY THE COURT. CORRESPOND WITH CO COUNSEL REGARDING SAME. DEVELOP STRATEGY,.	0.3	\$159.00
12/18/2020	HDR	EDIT AND REVISE DRAFT INTERROGS TO DEFENDANTS.	2.4	\$1,272.00
12/18/2020	TJO	BEGIN PREPARING DOCUMENT DEMANDS.	0.4	\$252.00
12/19/2020	HDR	INTERNAL CORRESPOND. REGARDING AMENDMENT TO FRCP. DEVELOP STRATEGY.	0.1	\$53.00
12/20/2020	HDR	DEVELOP STRATEGY REGARDING PROPOSED 30B6 NOTICES TO DEFENDANTS. CORRESPOND WITH CO COUNSEL REGARDING SAME.	0.3	\$159.00
12/20/2020	TJO	PREFORM PRELIMINARY RESEARCH REGARDING WHETHER MORE THAN ONE 30(B)(6) NOTICE CAN BE SERVED ON NJDOE (0.6); PREPARE 30(B)(6) NOTICE REGARDING DOCUMENT RETENTION AND SEARCHES (0.7); EMAIL NOTICE TO CO-COUNSEL AND ADVISE OF PRECLUSION CONCERNS (0.2).	1.5	\$945.00
12/21/2020	HDR	CORRESPOND WITH CO-COUNSEL REGARDING PROPOSED SETTLEMENT OFFER.	0.1	\$53.00
12/21/2020	HDR	DRAFT AND REVISE FIRST INTERROGS. AND REQUESTS TO PRODUCE TO PLAINTIFF.	1.8	\$954.00

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12/21/2020	HDR	CORRESPOND WITH CO-COUNSEL AND ADVERSARY REGARDING 30B6 NOTICE(S) ON DEFENDANTS. DEVELOP STRATEGY.	0.3	\$159.00
12/21/2020	HDR	REVIEW/REVISE DRAFT INTERROGS AND REQUESTS TO PRODUCE TO DEFENDANTS.	1.8	\$954.00
12/21/2020	TJO	REVISE DOCUMENT REQUESTS (6.2); BEGIN DRAFTING 30(B)(6) NOTICE (0.9).	7.1	\$4,473.00
12/22/2020	HDR	CORRESPOND WITH CO COUNSEL REGARDING SCHEDULING OF CONFERENCE TO DEVELOP STRATEGY REGARDING DISCOVERY REQUESTS.	0.1	\$53.00
12/22/2020	HDR	REVIEW/PREPARE DRAFT DISCOVERY DEMANDS TO DEFENDANTS.	0.5	\$265.00
12/22/2020	HDR	CORRESPOND WITH CO-COUNSEL TO DEVELOP STRATEGY REGARDING PROPOSED CONSENT AGREEMENT.	0.1	\$53.00
12/22/2020	TJO	REVISE DOCUMENT DEMANDS AND 30(B)(6) DEPOSITION NOTICES (1.8); REVIEW AND REVISE DRAFT REQUESTS FOR ADMISSIONS (0.4); REVIEW DRAFT INTERROGATORIES (0.1); EMAIL DRAFT DISCOVERY REQUESTS TO CO-COUNSEL (0.1).	2.4	\$1,512.00
12/23/2020	HDR	DEVELOP STRATEGY REGARDING ESI PROTOCOL. CORRESPOND WITH CO-COUNSEL AND ADVERSARY REGARDING MEET & CONFER REGARDING SAME.	0.5	\$265.00
12/23/2020	HDR	CORRESPOND WITH R. THURSTON REGARDING CASE SCHEDULE. DEVELOP STRATEGY.	0.1	\$53.00
12/23/2020	HDR	CORRESPOND WITH TEAM AND ADVERSARY REGARDING PROPOSED CONSENT AGREEMENT.	0.2	\$106.00
12/23/2020	TJO	EXCHANGE EMAILS WITH J. RUE AND PARTNER (HDR) REGARDING ESI PROTOCOL.	0.1	\$63.00
12/30/2020	TJO	EXCHANGE EMAILS WITH R. THURSTON REGARDING COMMENTS ON DRAFT DISCOVERY REQUESTS.	0.1	\$63.00
12/31/2020	HDR	CORRESPOND WITH CO COUNSEL REGARDING STRATEGY REGARDING RULE 26 DISCLOSURES AND OTHER DISCOVERY AND CONFIDENTIALITY ISSUES.	0.3	\$159.00
12/31/2020	TJO	REVIEW COMMENTS ON DRAFT DISCOVERY REQUESTS.	0.2	\$126.00
1/4/2021	HDR	TELCON WITH CO COUNSEL TO DEVELOP STRATEGY REGARDING DISCOVERY.	0.4	\$212.00
1/4/2021	HDR	CORRESPOND WITH CO COUNSEL AND ADVERSARY REGARDING CONFIDENTIALITY AGREEMENT.	0.1	\$53.00
1/4/2021	HDR	PARTICIPATE IN TEAM CALL. CORRESPOND WITH CO-COUNSEL DEVELOP STRATEGY REGARDING SCHEDULING.	0.2	\$106.00

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1/4/2021	TJO	REVISE DISCOVERY REQUESTS (2.0); TELEPHONE CONFERENCE WITH J. RUE AND R. THURSTON REGARDING DISCOVERY ISSUES (0.7); TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING TO DO LIST FOR DISCOVERY (0.4).	3.1	\$1,953.00
1/5/2021	TJO	TELEPHONE CONFERENCE WITH D. DWYER REGARDING COMMENTS ON DISCOVERY REQUESTS.	0.4	\$252.00
1/8/2021	HDR	DEVELOP STRATEGY REGARDING DISCOVERY. CORRESPOND WITH ADVERSARY REGARDING DRAFT DCO.	0.3	\$159.00
1/8/2021	TJO	REVISE AND FINALIZE DISCOVERY REQUESTS (1.4); DRAFT LETTER TO OPPOSING COUNSEL REGARDING SERVING DISCOVERY REQUESTS (0.2).	1.6	\$1,008.00
1/8/2021	NMT	CREATE DISCOVERY TRACKER MASTER SPREADSHEET TO MONITOR ALL DISCOVERY DOCUMENTS PER HDR.	0.3	\$70.50
1/11/2021	HDR	EDIT AND REVISE DRAFT ESI STIP. CORRESPOND WITH CO COUNSEL AND ADVERSARY REGARDING SAME.	1.2	\$636.00
1/11/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING IDENTITIES OF PLAINTIFF.	0.1	\$53.00
1/11/2021	HDR	CORRESPOND WITH CO COUNSEL AND ADVERSARY REGARDING DISCOVERY ISSUES.	0.2	\$106.00
1/11/2021	HDR	ATTEND TO CORRESPONDENCE TO ADVERSARY REGARDING PENDING DISCOVERY ISSUES, CORRESPOND WITH CO COUNSEL AND ADVERSARY REGARDING SAME.,.	1.1	\$583.00
1/11/2021	HDR	DEVELOP STRATEGY REGARDING DISCOVERY RESPONSES. CORRESPOND WITH T. OLEARY AND CO COUNSEL REGARDING SAME.	0.3	\$159.00
1/11/2021	TJO	CONFER WITH PARTNER (HDR) REGARDING NEED TO MAKE RECORD OF DELAYS BY STATE (0.1); REVIEW EMAIL BY HDR TO J. RUE REGARDING SAME AND RESPOND (0.1); REVIEW AND COMMENT ON DRAFT LETTER BY J. RUE TO DAG REGARDING OUTSTANDING DISCOVERY ISSUES (0.1); DRAFT LETTER TO K. SORRANO REGARDING PROVIDING PERSONAL IDENTIFYING INFORMATION OF PLAINTIFFS (0.3); EXCHANGE EMAILS WITH S. DALRYMPLE REGARDING SAME (0.1).	0.8	\$504.00
1/11/2021	NMT	ATTEND TO COURT'S SCHEDULING ORDER; SEND CALENDAR REMINDERS REGARDING SAME.	0.2	\$47.00
1/12/2021	HDR	ATTEND TO ESI STIPULATION. CORRESPOND WITH CO COUNSEL AND ADVREARY REGARDING SAME.	2.0	\$1,060.00
1/12/2021	HDR	PREPARE OBJECTIONS TO DEFENDANTS' DISCOVERY DEMANDS.	2.9	\$1,537.00
1/12/2021	HDR	RECEIVE AND REVIEW DEFENDANTS INITIAL DISCOVERY DEMANDS.	0.1	\$53.00

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1/12/2021	HDR	RECEIVE AND REVIEW PROPOSED DCO FILED WITH COURT.	0.1	\$53.00
1/13/2021	HDR	RECEIVE AND REVIEW DCO ENTERED BY THE COURT.	0.1	\$53.00
1/13/2021	HDR	REVIEW/ANALYZE DEFENDANTS DISCOVERY DEMANDS. DEVELOP STRATEGY REGARDING RESPONSE TO SAME.	1.9	\$1,007.00
1/13/2021	HDR	ATTEND TO ESI STIP. DEVELOP STRATEGY REGARDING SAME.	0.3	\$159.00
1/13/2021	HDR	REVIEW/DEVELOP STRATEGY REGARDING RESPONSE TO DEFENDANTS' DISCOVERY DEMANDS. CORRESPOND WITH J, RUE REGARDING SAME.	0.9	\$477.00
1/14/2021	HDR	CONFER WITH CO COUNSEL REGARDING DISCOVERY RESPONSES. INTERNAL CORRESP REGARDING SAME.	1.0	\$530.00
1/14/2021	TJO	REVIEW DISCOVERY REQUESTS SERVED BY STATE AND PREPARE AGENDA FOR CALL WITH CO-COUNSEL (0.9); ZOOM CONFERENCE WITH CO-COUNSEL REGARDING STATE'S DISCOVERY REQUESTS (0.8).	1.7	\$1,071.00
1/15/2021	HDR	CORRESPOND WITH T. OLEARY AND J. RUE REGARDING PROPOSED ESI STIPULATION.	0.1	\$53.00
1/15/2021	HDR	ATTEND TO PROPOSED REVISIONS TO ESI STIP. ZOOM CONFERENCE WITH J. RUE AND T. OLEARY REGARDING SAME.	1.3	\$689.00
1/15/2021	HDR	TELCON WITH T OLEARY TO DISCUSS STRATEGY REGARDING DISCOVERY RESPONSES. EDIT AND REVISE DRAFT RESPONSES TO REQUEST TO PRODUCE.	2.3	\$1,219.00
1/15/2021	TJO	BEGIN REVISING ANSWERS TO INTERROGATORIES (3.9); CONFERENCE CALL WITH J. RUE AND H. RUIZ REGARDING ESI PROTOCOL (0.7); REVIEW EMAIL FROM J. RUE AND PROOF LATEST VERSION OF ESI PROTOCOL (0.3).	4.9	\$3,087.00
1/17/2021	HDR	CORRESPOND WITH J RUE AND T OLEARY REGARDING MEET AND CONFER REGARDING ESI STIP. CORRESPOND WITH ADVERSARY REGARDING ESI STIL.	0.1	\$53.00
1/18/2021	HDR	EDIT AND REVISE RESPONSES TO REQUESTS TO PRODUCE. CORRESPOND WITH T OLEARY AND J RUE RULE 26 DISCLOSURES.	3.5	\$1,855.00
1/18/2021	TJO	CONTINUE DRAFTING ANSWERS TO INTERROGATORIES.	3.6	\$2,268.00
1/19/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING AMENDED RULE 26 DISCLOSURES. DEVELOP STRATEGY. EDIT AND REVISE DRAFT AMENDED RULE 26 DISCLOSURES, REVIEW CORRESP. TO COUNSEL REGARDING AMENDED RULE 26 DISCLOSURES.	1.0	\$530.00
1/19/2021	TJO	CONTINUE DRAFTING ANSWER TO INTERROGATORIES (3.6); DRAFT AMENDED RULE 26 DISCLOSURES AND TRANSMITTAL LETTER TO COUNSEL (0.5).	4.1	\$2,583.00

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1/20/2021	HDR	REVIEW CORRESPONDENCE REGARDING PROPOSED ESI STIPULATION.	0.1	\$53.00
1/20/2021	HDR	EDIT/REVISE DRAFT RESPONSES TO DEFENDANTS' INTERROGS.	2.6	\$1,378.00
1/20/2021	TJO	REVISE DRAFT RESPONSES TO DOCUMENT DEMANDS (1.1); REVISE RESPONSES TO INTERROGATORIES (1.9); DRAFT EMAIL TO CO-COUNSEL REGARDING FORWARDING DRAFT DISCOVERY RESPONSES (0.1).	3.1	\$1,953.00
1/22/2021	HDR	DEVELOP STRATEGY REGARDING DISCOVERY RESPONSES.	0.2	\$106.00
1/22/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING PROPOSED ESI STIPULATION.	0.1	\$53.00
1/22/2021	TJO	REVIEW FILES FOR DOCUMENTS RESPONSES TO DEFENDANT'S REQUESTS AND FORWARD TO PARALEGAL (3.1); BEGIN ANSWERING INTERROGATORIES SPECIFIC TO CLIENT (1.2).	4.3	\$2,709.00
1/24/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING STRATEGY REGARDING DISCOVERY RESPONSES TO DEFENDANTS' DISCOVERY REQUESTS.	0.1	\$53.00
1/25/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING PROPOSED ESI STIPULATION.	0.1	\$53.00
1/25/2021	HDR	INTERNAL CORRESPONDENCE TO DEVELOP STRATEGY REGARDING RESPONSE TO DEFENDANTS' REQUEST FOR DOCUMENTS.	0.1	\$53.00
1/25/2021	HDR	Communicate (other external) DEVELOP STRATEGY REGARDING RESPONSES TO DEFENDANTS' DISCOVERY REQUESTS.	0.3	\$159.00
1/25/2021	TJO	CONTINUE DRAFTING CLIENT'S ANSWERS TO INTERROGATORIES.	4.0	\$2,520.00
1/25/2021	NMT	ATTEND TO REVIEW OF PRODUCTION DOCUMENTS AND MARK WITH CONFIDENTIAL DESIGNATIONS ACCORDINGLY.	1.8	\$423.00
1/26/2021	NMT	ATTEND TO REVIEW OF PRODUCTION DOCUMENTS AND MARK WITH CONFIDENTIAL DESIGNATIONS ACCORDINGLY.	2.8	\$658.00
1/27/2021	HDR	CORRESPOND WITH COCOUNSEL AND ADVERSARY REGARDING ESI STIP. DEVELOP STRATEGY.	0.2	\$106.00
1/27/2021	HDR	EDIT AND REVISE JM DRAFT RESPONSES TO INTERGGOS. INTERNAL CORRESPONDENCE REGARDING SAME. DEVELOP STRATEGY.	2.0	\$1,060.00
1/27/2021	NMT	ATTEND TO REVIEW OF PRODUCTION DOCUMENTS AND MARK WITH CONFIDENTIAL DESIGNATIONS ACCORDINGLY.	1.5	\$352.50
1/28/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING ESI STIP. INTERNAL CORRESPONDENCE REGARDING SAME.	0.1	\$53.00

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1/28/2021	HDR	CORRESPOND WITH ADVERSARY AND INTERNAL CORRESPONDENCE REGARDING ESI STIPULATION.	0.1	\$53.00
1/28/2021	HDR	INTERNAL CORRESPONDENCE AND CORRESPOND WITH CO COUNSEL REGARDING STRATEGY REGARDING ROG RESPONSES.	0.1	\$53.00
1/28/2021	TJO	REVISE MASTER INTERROGATORY RESPONSES AND EMAIL SAME TO CO-COUNSEL.	0.2	\$126.00
1/29/2021	NMT	ATTEND TO REVIEW OF PRODUCTION DOCUMENTS AND MARK WITH CONFIDENTIAL DESIGNATIONS ACCORDINGLY.	3.2	\$752.00
1/31/2021	HDR	DEVELOP STRATEGY REGARDING DISCOVERY. INTERNAL CORRESP. REGARDING SAME.	0.1	\$53.00
2/1/2021	HDR	RECEIVE AND REVIEW FINAL DISCOVERY DEMANDS AND 30B6 NOTICE SERVED ON DEFENDANTS.	0.3	\$159.00
2/1/2021	HDR	CORRESPOND WITH CLIENT REGARDING DRAFT RESPONSES TO INTERROGS.	0.1	\$53.00
2/1/2021	TJO	REVISE ANSWERS TO INTERROGATORIES (1.9); EMAIL CLIENTS REGARDING THUMBDRIVE OF EMAILS (0.1).	2.0	\$1,260.00
2/1/2021	NMT	ATTEND TO REVIEW OF PRODUCTION DOCUMENTS AND MARK WITH CONFIDENTIAL DESIGNATIONS ACCORDINGLY.	2.1	\$493.50
2/2/2021	HDR	CORRESPOND WITH PLAINTIFF/CLIENT DISCOVERY RESPONSES.	0.1	\$53.00
2/2/2021	NMT	ATTEND TO REVIEW OF PRODUCTION DOCUMENTS AND MARK WITH CONFIDENTIAL DESIGNATIONS ACCORDINGLY.	4.7	\$1,104.50
2/3/2021	HDR	INTERNAL CORRESPONDENCE TO DEVELOP STRATEGY. CORRESPOND WITH ADVERSARY. CORRESPOND WITH CO COUNSEL REGARDING DOCUMENT PRODUCTION.	0.5	\$265.00
2/3/2021	HDR	REVIEW PERRY PLAINTIFF DISCOVERY RESPONSES.	0.5	\$265.00
2/4/2021	HDR	RECEIVE AND REVIEW DEFENDANTS' COMMENTS TO ESI STIP. CORRESPOND WITH CO COUNSEL REGARDING PROPOSED TELECONFERENCE. TO DISCUSS SAME.	0.3	\$159.00
2/4/2021	HDR	PREPARE DRAFT TRANSMISSION LETTER REGARDING SERVICE OF PLAINTIFFS' DISCOVERY DEMANDS.	0.1	\$53.00
2/4/2021	HDR	REVIEW/REVISE SERVICE LETTER REGARDING PLAINTIFFS RESPONSES TO DEFENDANT'S DISCOVERY REQUESTS.	0.1	\$53.00
2/4/2021	HDR	CORRESPOND WITH D. GILES REGARDING DISCOVERY STRATEGY.	0.1	\$53.00
2/4/2021	TJO	REVIEW STATE'S COMMENTS ON ESI PROTOCOL (0.2); EMAIL J. RUE REGARDING STATE'S COMMENTS (0.1).	0.3	\$189.00
2/4/2021	NMT	ATTEND TO DRAFT OF CORRESPONDENCE REGARDING RESPONSES TO PLAINTIFF'S DISCOVERY REQUESTS.	0.3	\$70.50
2/5/2021	HDR	RECEIVE AND REVIEW MARVIN PLAINTIFFS' INTERROG RESPONSES.	0.1	\$53.00

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2/5/2021	HDR	PARTICIPATE IN ZOOM MEETING WITH CO-COUNSEL TO ADDRESS DEFENDANTS EDITS TO ESI STIP AND DISCOVERY ISSUES. EDIT AND REVISE ESI STIP. CORRESPOND WITH CO-COUNSEL REGARDING DISCOVERY RESPONSES.	1.0	\$530.00
2/5/2021	HDR	CORRESPOND WITH CO-COUNSEL D. GILES REGARDING DRAFT DISCOVERY RESPONSES.	0.1	\$53.00
2/5/2021	HDR	ATTEND TO ESI STIP. CORRESPOND WITH CO COUNSEL REGARDING DISCOVERY. DEVELOP STRATEGY.	1.5	\$795.00
2/5/2021	TJO	REVIEW AND REVISE MILLIGAN'S ANSWERS TO INTERROGATORIES.	2.8	\$1,764.00
2/5/2021	MH	REVIEW .PST PROPERTIES ON EMAIL FOLDER EXTRACTION FOR PRODUCTION AND CALL WITH T. O'LEARY REGARDING THE SAME.	0.9	\$211.50
2/8/2021	HDR	CORRESPOND WITH CO-COUNSEL REGARDING STRATEGY REGARDING DISCOVERY AND ESI MEET AND CONFER. RECEIVE AND REVIEW RESPONSES FROM DEFENDANTS.	0.3	\$159.00
2/8/2021	HDR	CORRESPOND WITH CLIENT REGARDING RESPONSES TO INTERROGS.	0.1	\$53.00
2/8/2021	HDR	ATTEND TO ESI STIP. INTERNAL CORRESPONDENCE AND CORRESPOND WITH CO COUNSEL TO DEVELOP STRATEGY REGARDING DISCOVERY.	0.5	\$265.00
2/8/2021	TJO	REVIEW AND COMMENT ON ESI STIPULATION (0.9); EMAIL J. RUE REGARDING NEED TO ADJUST COMMENTS ON STIPULATION REGARDING FERPA (0.2); REVIEW EMAIL FROM DAG REGARDING REQUESTING EXTENSION OF TIME TO SERVE DOCUMENTS (0.1); TELEPHONE CONFERENCE WITH E. MARVIN REGARDING PRODUCTION OF ESI (0.1).	1.3	\$819.00
2/9/2021	HDR	REVIEW/ANALYZE REGARDING DEFENDANTS' OBJECTIONS TO 30B6 NOTICE.	0.5	\$265.00
2/9/2021	HDR	CORRESPOND WITH CO COUNSEL AND ADVERSARY REGARDING MEET & CONFER. CORRESPOND REGARDING CLIENTS SIGNED DISCOVERY RESPONSES.	0.3	\$159.00
2/9/2021	HDR	INTERNAL CORRESPONDENCE WITH TEAM REGARDING ESI AND DISCOVERY. CORRESPOND WITH ADVERSARY REGARDING MEET AND CONFER.	0.2	\$106.00
2/9/2021	TJO	REVIEW STATE'S RESPONSES TO WRITTEN DISCOVERY REQUESTS (0.6); EXCHANGE EMAILS WITH J. RUE REGARDING SCHEDULING CONFERENCE CALL TO DISCUSS STATE'S RESPONSES (0.1); EXCHANGE EMAILS WITH K. SORRANO REGARDING SCHEDULING MEET AND CONFER SESSION (0.1).	0.8	\$504.00

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2/9/2021	MH	ATTEND TO EMAILS WITH E. PERRY ON EXTRACTION OF RELEVANT EMAILS FROM YAHOO ACCOUNT, RESEARCH PROCESS FOR THE SAME, AND DRAFT MEMO OF INSTRUCTIONS REGARDING CREATION OF .PST FILE FOR PRODUCTION.	1.7	\$399.50
2/10/2021	HDR	DEVELOP STRATEGY REGARDING DISCOVERY. CORRESPOND WITH CO COUNSEL REGARDING SAME. CORRESPOND WITH ADVERSARY REGARDING MEET & CONFER.	0.4	\$212.00
2/10/2021	HDR	PREPARE FOR MEET AND CONFER WITH ADVERSARY.	1.0	\$530.00
2/10/2021	HDR	CORRESPOND WITH D. GILES REGARDING PROPOSED DISCOVERY RESPONSES.	0.1	\$53.00
2/10/2021	HDR	REVIEW AND ANALYZE DEFENDANT INTERROG. RESPONSES.	0.9	\$477.00
2/10/2021	HDR	REVIEW DEFENDANTS RESPONSES TO INTERROGS.	0.3	\$159.00
2/10/2021	TJO	TELEPHONE CONFERENCE WITH D. SOUTAR AND H. RUIZ REGARDING PREPARATION FOR MEET AND CONFER WITH STATE (1.3); REVIEW EMAIL FROM D. GILES REGARDING DISCOVERY RESPONSES AND RESPOND (0.1).	1.4	\$882.00
2/10/2021	MH	ATTEND TO EMAILS WITH E. MARVIN ON EXTRACTION OF RELEVANT EMAILS FROM AOL ACCOUNT, RESEARCH PROCESS FOR THE SAME, AND DRAFT MEMO OF INSTRUCTIONS REGARDING CREATION OF .PST FILE FOR PRODUCTION.	1.5	\$352.50
2/10/2021	NMT	ATTEND TO ISSUES REGARDING DOWNLOAD OF DOCUMENTS RECEIVED FROM PLAINTIFF MILLIGAN IN RESPONSE TO NJDOE REQUEST FOR THE PRODUCTION OF DOCUMENTS.	0.3	\$70.50
2/11/2021	HDR	CORRESPOND W/ ADVERSARY REGARDING PLAINTIFFS' RESPONSES TO DEFENDANTS' DISCOVERY REQUESTS.	0.1	\$53.00
2/11/2021	TJO	REVIEW LETTER FROM K. SORANNO REGARDING SETTLEMENT (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING SETTLEMENT (0.2); DRAFT EMAIL TO D. GILES REGARDING STATUS OF RECEIPT OF HIS CLIENT'S ANSWERS TO INTERROGATORIES (0.1); TELEPHONE CONFERENCE WITH D. GILES REGARDING SAME (0.1); EMAIL D. SOUTAR REGARDING REQUESTING COPIES OF ANSWERS TO INTERROGATORIES (0.1); DRAFT LETTER TO K. SORRANO REGARDING SERVING DISCOVERY RESPONSES (0.4); PREPARE FOR MEET AND CONFER SESSION (2.4); ATTEND MEET AND CONFER SESSION (1.5); CONFER WITH CO-COUNSEL AFTER MEET AND CONFER SESSION (0.3).	5.1	\$3,213.00
2/11/2021	MH	ATTEND TO COORDINATION OF E. MARVIN AND E. PERRY EMAILS FOR PRODUCTION.	0.8	\$188.00

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2/11/2021	NMT	ATTEND TO REVIEW AND RETRIEVAL OF DISCOVERY RESPONSES FROM JRA CLIENTS VIA SECURE SHARE LINK; ATTEND TO ORGANIZATION OF SAME.	0.9	\$211.50
2/12/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING DISCOVERY ISSUES. DEVELOP STRATEGY.	0.3	\$159.00
2/12/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING MEET & CONFER. RECEIVE AND REVIEW DEFENDANTS' PRODUCTION.	0.2	\$106.00
2/12/2021	TJO	CONFER WITH CO-COUNSEL IN ZOOM CALL REGARDING MEET AND CONFER WITH K. SORRANO (0.7); REVIEW DOCUMENTS PRODUCED BY NJDOE (6.4).	7.1	\$4,473.00
2/12/2021	MH	ATTEND TO E. MARVIN EMAILS, CONVERSION TO .PST FOR PRODUCTION AND TROUBLESHOOT ISSUES WITH THE SAME.	2.7	\$634.50
2/12/2021	MH	ATTEND TO CALL WITH E. PERRY REGARDING EMAILS/CONVERSION, TROUBLESHOOT ISSUES AND DRAFT SUMMARY OF THE SAME TO T. O'LEARY.	1.2	\$282.00
2/12/2021	NMT	ATTEND TO REVIEW AND RETRIEVAL OF DOCUMENT PRODUCTIONS FROM ALL PLAINTIFFS; REVIEW, ORGANIZE, CREATE SECURE SHARE LINK, AND SERVE DOCUMENT PRODUCTIONS.	1.1	\$258.50
2/15/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING MEET & CONFER.	0.1	\$53.00
2/16/2021	HDR	CORRESPOND WITH J. RUE AND K. SERRANO W/R/T SETTLEMENT NEGOTIATIONS. CORRESPOND WITH CO COUNSEL AND ADVERSARY REGARDING NEXT MEET & CONFER. CORRESPOND WITH M. HOGAN AND CO COUNSEL REGARDING ESI.	0.3	\$159.00
2/16/2021	HDR	DRAFT AND REVIEW DEPOSITION NOTICE W/R/T C. ANTHONY. CORRESPOND WITH CO-COUNSEL REGARDING MEET & CONFER AGENDA. CORRESPOND WITH ADVERSARY REGARDING MEET & CONFER.	0.9	\$477.00
2/16/2021	HDR	CORRESPOND WITH COUNSEL FOR PARTIES REGARDING MEET AND CONFER. CORRESPONDENCE WITH CO-COUNSEL REGARDING SERVICE OF EDISCOVERY. CORRESPOND WITH ADVERSARY REGARDING SETTLEMENT DEMAND. DEVELOP STRATEGY REGARDING DISCOVERY.	0.5	\$265.00
2/16/2021	HDR	REVIEW/ANALYZE DEFENDANTS' OBJECTIONS TO PLAINTIFFS' RFAS.	0.5	\$265.00
2/16/2021	HDR	CORRESPOND WITH D. SOUTER REGARDING DOCUMENT PRODUCTION LOGISTICS.	0.1	\$53.00

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2/16/2021	TJO	BEGIN DRAFTING DISCOVERY DEFICIENCY LETTER (6.4); DRAFT EMAIL TO L. QUARTOLO REGARDING NJDOE CASE LIST (0.1); DRAFT EMAIL TO D. GILES REGARDING PRODUCTION OF ESI (0.1); REVIEW EMAIL FROM K. SORRANO REGARDING RESPONDING TO RUE EMAIL REGARDING SETTLEMENT DEMAND (0.1); REVIEW EMAIL FROM J. RUE AND COMMENT ON DRAFT RESPONSE TO SORANNO (0.1); DRAFT LETTER TO K. SORANNO REGARDING PRODUCING INTERROGATORIES (0.2); REVIEW EMAIL FROM K. SORANNO REGARDING MEET AND CONFER FOLLOW-UP AND DRAFT RESPONSIVE EMAIL (0.2).	7.2	\$4,536.00
2/16/2021	MH	ATTEND TO EMAILS WITH DEFENDANTS' COUNSEL REGARDING COORDINATION OF CONVERSION OF CLIENT EMAILS TO .PST FOR PRODUCTION.	0.7	\$164.50
2/17/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING DEFENDANTS' DOCUMENT PRODUCTION. DEVELOP STRATEGY REGARDING SAME.	0.3	\$159.00
2/17/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING SCHEDULING REGARDING DEPOSITION REGARDING C. ANTHONY.	0.1	\$53.00
2/17/2021	HDR	ATTEND TO REVISED DRAFT OF ESI STIP. CORRESPOND WITH ADVERSARY REGARDING SAME. PREPARE DRAFT MEET & CONFER AGENDA. RECEIVE/REVIEW DEFICIENCY LETTER TO DEFENDANTS. CORRESPOND WITH CO COUNSEL REGARDING PLAINTIFFS PRODUCTION OF ESI.	3.8	\$2,014.00
2/17/2021	TJO	CONTINUE DRAFTING LETTER TO K. SORANNO REGARDING DISCOVERY DEFICIENCIES (1.8); EMAIL DRAFT OF LETTER TO CO-COUNSEL FOR REVIEW AND COMMENT (0.1); REVIEW COMMENTS ON LETTER FROM C. REISMAN AND REVISE LETTER (0.2); REVIEW COMMENTS ON LETTER FROM D. DWYER AND REVISE LETTER (0.2); REVIEW CORRESPONDENCE FROM K. SORANNO (0.1).	2.4	\$1,512.00
2/17/2021	MH	ATTEND TO CALL WITH L. QUARTAROLO REGARDING EMAIL PRODUCTION, .PST CONVERSION, POSSIBLE ALTERNATIVES, AND TROUBLESHOOTING.	0.8	\$188.00
2/17/2021	MH	ATTEND TO CALL WITH D. GILES REGARDING EMAIL PRODUCTION, .PST CONVERSION, POSSIBLE ALTERNATIVES, AND TROUBLESHOOTING.	0.4	\$94.00
2/17/2021	MH	ATTEND TO FOLLOW-UP WITH C. REISMAN REGARDING STATUS OF E. PERRY RESPONSIVE EMAIL FOLDER AND ALTERNATIVE TO .PST.	0.1	\$23.50
2/18/2021	HDR	CORRESPOND WITH ADVERSARY AND TEAM REGARDING 2.19.21 MEET AND CONFER, AND ADJOURNMENT REGARDING SAME.	0.2	\$106.00
2/18/2021	HDR	CORRESPOND WITH CO-COUNSEL DENISE L. REGARDING DEFENDANTS; DOCUMENT PRODUCTION.	0.1	\$53.00

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2/18/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING AMENDED 30B6 NOTICE TO DEFENDANTS.	0.1	\$53.00
2/18/2021	HDR	CORRESPOND WITH PLAINTIFFS' COUNSEL AND ADVERSARY REGARDING DISCOVERY DEFICIENCY LETTER TO DEFENDANTS.	0.2	\$106.00
2/18/2021	TJO	REVISE LETTER TO K. SORANNO REGARDING DISCOVERY DEFICIENCIES (0.4); REVIEW EMAIL FROM K. SORANNO AND RESPOND REGARDING MEET AND CONFER SESSION (0.1); DRAFT AMENDED RULE 30(B)(6) NOTICE AND EMAIL TO CO-COUNSEL FOR REVIEW AND COMMENT (0.6); REVIEW COMMENTS FROM C. REISMAN (0.1); REVIEW COMMENTS FROM J. RUE AND DRAFT RESPONSIVE EMAIL (0.2); TELEPHONE CONFERENCE WITH D. DWYER REGARDING COMMENTS ON NOTICE AND DISCOVERY ISSUES (0.7).	2.2	\$1,386.00
2/18/2021	MH	DRAFT STATUS MEMO TO T. O'LEARY AND H. RUIZ REGARDING ESI.	1.3	\$305.50
2/19/2021	HDR	STUDY/REVIEW AMENDED 30BB6 NOTICE.	0.3	\$159.00
2/19/2021	HDR	DEVELOP STRATEGY REGARDING PROPOSED SUBPOENA REGARDING OAL.	0.1	\$53.00
2/19/2021	HDR	REVIEW AMENDED 30B6 NOTICE TO DEFENDANTS. CALL WITH TJO TO DEVELOP STRATEGY REGARDING DISCOVERY. ATTEND TO DISCOVERY PRODUCTION TO DEFENDANTS. PREPARE LETTER RESPONDING TO DEFENDANTS' 2.17.2021 LETTER REGARDING ROLLING PRODUCTION.	1.3	\$689.00
2/19/2021	TJO	CONFERENCE WITH PARALEGAL (MH) REGARDING STATUS OF ESI RETRIEVAL (0.2); FINALIZE AMENDED RULE 30(B)(6) NOTICE AND DRAFT LETTER TO K. SORANNO REGARDING SERVING SAME (0.2); REVIEW STATE'S DOCUMENT PRODUCTION TO SELECT DOCUMENTS TO EMAIL TO CO-COUNSEL (0.7); DRAFT EMAIL TO CO-COUNSEL REGARDING RECOMMENDING SERVICE OF SUBPOENA ON OAL (0.3).	1.4	\$882.00
2/19/2021	MH	CALLS WITH E. PERRY, T. O'LEARY, H. RUIZ AND IT DEPARTMENT, RESEARCH SOFTWARE FOR ESI CONVERSION, CREATE MOCK EMAIL ACCOUNTS AND FTPS FOR ESI, TROUBLESHOOT .PST ISSUES WITH E. PERRY, REVIEW DRAFT ESI AGREEMENT, ATTEND TO EMAILS WITH L. QUARTAROLO ON STATUS/REQUIREMENTS, AND DRAFT MEMO ON GMAIL.	5.4	\$1,269.00
2/20/2021	HDR	CORRESPOND WITH CO-COUNSEL REGARDING STRATEGY REGARDING PROPOSED SUBPOENA TO OAL.	0.1	\$53.00
2/22/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING PROPOSED MEET AND CONFER.	0.1	\$53.00

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2/22/2021	HDR	DEVELOP STRATEGY REGARDING PROPOSED SUBPOENA TO OAL. CORRESPOND WITH CO COUNSEL REGARDING SAME.	0.1	\$53.00
2/22/2021	HDR	TELECONFERENCE. WITH TJO TO DEVELOP STRATEGY REGARDING DISCOVERY.	0.1	\$53.00
2/22/2021	TJO	REVIEW EMAILS BETWEEN C. REISMAN AND PARALEGAL REGARDING PRODUCTION OF ESI (0.1); CONFER WITH LAW CLERK REGARDING RESEARCH ON HOW TO SERVE OAL WITH SUBPOENA (0.1).	0.2	\$126.00
2/22/2021	MH	ATTEND TO CALLS WITH E. PERRY ON CONVERSION OF PERSONAL EMAIL TO .PST, EXTRACT THE SAME, UPLOAD TO FTP FOR C. REISMAN REVIEW, AND DRAFT/RESPOND EMAILS WITH TEAM ON REMOVAL OF PRIVILEGED COMMUNICATIONS.	2.6	\$611.00
2/22/2021	CC	RESEARCH REGARDING SUBPOENA SERVICE OF PROCESS AND THE OFFICE OF ADMINISTRATIVE LAW.	4.5	\$1,305.00
2/23/2021	HDR	DRAFT/REVISE RULE 45 SUBPOENA AND NOTICE OF SUBPOENA TO OAL.	1.6	\$848.00
2/23/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING PROPOSED LETTER TO ADVERSARY REQUESTING DATE CERTAIN FOR DOCUMENT PRODUCTION. CORRESPOND WITH ADVERSARY REGARDING SAME.	0.2	\$106.00
2/23/2021	HDR	CORRESPOND WITH TEAM REGARDING STRATEGY TO C. ANTHONY. CORRESPOND WITH ADVERSARY REGARDING SERVICE OF DEP NOTICE REGARDING SAME.	0.3	\$159.00
2/23/2021	TJO	REVISE LETTER TO K. SORANNO REGARDING RESPONDING TO 2/27/21 LETTER (0.2); EMAIL LETTER TO CO-COUNSEL FOR REVIEW AND COMMENT (0.1); REVIEW COMMENTS FROM CO-COUNSEL (0.1); EMAIL K. SORANNO REGARDING FORWARDING LETTER (0.1); REVISE DEPOSITION NOTICE FOR C. ANTHONY (0.2); DRAFT LETTER TO K. SORANNO REGARDING SERVING DEPOSITION NOTICE (0.1); REVISE RULE 30(B)(6) NOTICE (0.2); EMAIL DRAFT RULE 30(B)(6) NOTICE TO CO-COUNSEL FOR REVIEW AND COMMENT (0.1); CONFER WITH PARALEGAL (MH) REGARDING STATUS OF OBTAINING ESI (0.2).	1.3	\$819.00
2/23/2021	MH	REVIEW OF E. PERRY EMAILS AND REMOVE ATTORNEY CLIENT PRIVILEGED COMMUNICATIONS, CONVERT THE SAME TO .PST FOR PRODUCTION, COMPLETE INSTRUCTIONS MEMO ON GMAIL, AND ATTEND TO EMAILS WITH D. GILES ON CONVERSION OF CLIENT'S EMAIL.	2.3	\$540.50
2/24/2021	HDR	ATTEND TO PLAINTIFFS' SUBPOENA DIRECTED TO THE NJ OAL.	0.2	\$106.00
2/24/2021	HDR	RECEIVE AND REVIEW AMENDED RULE 36B6 NOTICE TO DEFENDANTS. CORRESPOND W/ CO COUNSEL REGARDING OAL SUBPOENA. DEVELOP STRATEGY.	0.2	\$106.00

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2/24/2021	HDR	ATTEND TO RULE 45 SUBPOENA TO OAL.	0.1	\$53.00
2/24/2021	TJO	REVISE RULE 45 SUBPOENA TOPICS (0.6); EMAIL DRAFT SUBPOENA TO CO-COUNSEL (0.1); REVIEW COMMENTS ON SUBPOENA FROM C. REISMAN (0.1); REVIEW COMMENTS ON SUBPOENA FROM D. DWYER AND REVISE SUBPOENA (0.1); FINALIZE SECOND AMENDED RULE 30(B)(6) NOTICE (0.1); DRAFT LETTER TO K. SORANNO REGARDING FORWARDING RULE 30(B)(6) NOTICE (0.1); REVIEW EMAIL FROM K. SORANNO REGARDING RULE 30(B)(6) NOTICE AND RESPOND (0.1).	1.1	\$693.00
2/24/2021	MH	ATTEND TO EMAILS WITH PLAINTIFF'S COUNSEL REGARDING RECEIPT OF M. MILLIGAN EMAILS AN LOGISTICS FOR PRODUCING THE SAME.	0.3	\$70.50
2/25/2021	HDR	ATTEND TO SERVICE OF SUPPL. PRODUCTION ON DEFENDANTS.	0.1	\$53.00
2/25/2021	HDR	CORRESPOND WITH TEAM REGARDING DOCUMENT PRODUCED BY DEFENDANTS.	0.1	\$53.00
2/25/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING RULE 45 SUBPOENA TO OAL. DEVELOP STRATEGY.	0.1	\$53.00
2/25/2021	TJO	REVIEW STATE'S DOCUMENT PRODUCTION AND CREATE FOLDER OF KEY DOCUMENTS FOR CO-COUNSEL TO REVIEW (2.9); CONFER WITH LAW CLERK REGARDING EFFECUATING SERVICE ON OAL (0.2); CONFERENCE WITH ASSOC. (ZEC) REGARDING VERIFICATION OF LAW CLERK'S FINDINGS (0.1).	3.2	\$2,016.00
2/25/2021	ZDE	COMMUNICATIONS WITH TJO REGARDING SERVICE OF SUBPEONA. REVIEW OF ATTORNEY GENERAL'S OFFICE SUPEONA PRACTICES AND POLICIES IN ORDER TO SERVE OAL WITH A SUBPEONA.	0.7	\$315.00
2/25/2021	MH	ATTEND TO M. MULLIGAN'S EMAILS, BATES STAMP THE SAME, AND CREATE FTP FOR SERVICE OF E. PERRY AND M. MULLIGAN'S SUPPLEMENTAL PRODUCTION.	0.9	\$211.50
2/26/2021	HDR	CORRESPOND W/ CO COUNSEL REGARDING OAL SUBPOENA.	0.1	\$53.00
2/26/2021	HDR	CORRESPOND WITH CO COUNSEL AND ADVERSARY REGARDING DEPOSITIONS AND 30B6 NOTICE. DEVELOP STRATEGY REGARDING SAME.	0.3	\$159.00
2/26/2021	HDR	CORRESP. WITH R. THURSTON REGARDING OAL SUBPOENA. DEVELOP STRATEGY.	0.1	\$53.00
2/26/2021	HDR	RECEIVE/REVIEW LETTER TO ADVERSARY REGARDING SUBPOENA TO OAL.	0.1	\$53.00

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2/26/2021	TJO	FINALIZE SUBPOENA TO OAL (0.6); REVIEW SUPREME COURT ORDERS TO VERIFY COURT'S APRIL 7, 2020 ORDER PERMITTING EMAIL SERVICE ON STATE ENTITIES HAS NOT BEEN SUPERSEDED (0.7); REVISE NOTICE OF INTENT TO ISSUE SUBPOENA (0.2); DRAFT LETTER TO K. SORANNO REGARDING SERVING NOTICE OF INTENT (0.2); DRAFT LETTER TO ATTORNEY GENERAL'S OFFICE REGARDING SERVICE OF SUBPOENA UPON OAL (0.2); DRAFT EMAIL TO ATTORNEY GENERAL'S OFFICE REGARDING SAME (0.1).	2.0	\$1,260.00
3/1/2021	HDR	RECEIVE DEFENDANTS RESPONSES TO 30B6. CORRESPOND WITH CO COUNSEL REGARDING C. ANTHONY DEPOSITION. DEVELOP STRATEGY.	0.3	\$159.00
3/1/2021	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING NEED TO MOVE FORWARD WITH ANTHONY DEPOSITION NOTWITHSTANDING HIS RESTRICTED AVAILABILITY (0.1); EXCHANGE EMAILS WITH J. RUE AND C. REISMAN REGARDING PREPARATION FOR ANTHONY DEPOSITION (0.1); REVIEW DOCUMENTS FORWARDED BY D. DWYER FROM OPRA REQUESTS (0.6); REVIEW STATE'S DOCUMENT PRODUCTION AND BEGIN PREPARING FOR C. ANTHONY DEPOSITION (1.4).	2.2	\$1,386.00
3/2/2021	HDR	CORRESPOND WITH CO COUNSEL DISCOVERY ISSUES. CORRESPOND WITH ADVERSARY REGARDING MEET & CONFER.	0.2	\$106.00
3/2/2021	HDR	TELCON WITH TJO TO DEVELOP STRATEGY REGARDING DISCOVERY.	0.2	\$106.00
3/2/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING 30B6 RESPONSES AND OAL SUBPOENA. DEVELOP STRATEGY.	0.3	\$159.00
3/2/2021	TJO	REVIEW STATE'S OBJECTIONS TO SECOND AMENDED RULE 30(B)(6) NOTICE (0.2); EMAIL H. RUIZ AND D. SOUTAR REGARDING AVAILABILITY FOR MEET AND CONFER WITH STATE (0.1); EXCHANGE EMAILS WITH C. REISMAN REGARDING RESEARCH ON DELIBERATIVE PROCESS PRIVILEGE (0.1); DRAFT SECOND SUBPOENA FOR OAL (1.3); DRAFT NOTICE OF INTENT TO SERVE SUBPOENA (0.2); DRAFT LETTER TO K. SORANNO REGARDING SERVING NOTICE OF INTENT TO SERVE SUBPOENA (0.1); DRAFT LETTER TO DAG'S OFFICE REGARDING SERVING SUBPOENA ON OAL (0.2); SERVE DEFENDANTS WITH PLAINTIFF'S SUPPLEMENTAL DOCUMENT PRODUCTION (0.2); CONTINUE PREPARING FOR ANTHONY DEPOSITION (1.9).	4.1	\$2,583.00
3/3/2021	HDR	DRAFT AND REVISE LETTER TO JUDGE WILLIAMS REGARDING DISCOVERY DISPUTES.	0.5	\$265.00
3/3/2021	HDR	CORRESPOND WITH TJO REGARDING DEPOSITION OF C. ANTHONY.	0.1	\$53.00
3/3/2021	HDR	RESEARCH AND ATTEND TO DISCOVERY DISPUTE CORRESPONDENCE DIRECTED TO JUDGE WILLIAMS.	1.5	\$795.00

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3/3/2021	TJO	REVISE LETTER TO JUDGE WILLIAMS (2.2); CONTINUE PREPARING FOR C. ANTHONY DEPOSITION (4.3).	6.5	\$4,095.00
3/3/2021	NMT	ATTEND TO RESEARCH REGARDING DISCOVERY DISPUTES BEFORE JUDGE WILLIAMS.	0.4	\$94.00
3/4/2021	HDR	CORRESPOND WITH TEAM REGARDING CORRESPONDENCE TO MAGISTRATE JUDGE WILLIAMS. EDIT AND REVISE DISCOVERY DISPUTE LETTER. MEET AND CONFER WITH ADVERSARY REGARDING DISCOVERY ISSUES. CORRESPOND WITH CO COUNSEL TO DEVELOP STRATEGY REGARDING SAME.	1.4	\$742.00
3/4/2021	TJO	REVISE LETTER TO JUDGE WILLIAMS REGARDING REQUESTING CONFERENCE TO RESOLVE DISCOVERY DISPUTES (1.3); CONTINUE PREPARING FOR ANTHONY DEPOSITION (6.1); TELEPHONE CONFERENCE WITH B. MARVIN REGARDING STATE'S DESIRE TO DEPOSE HER (0.1).	7.5	\$4,725.00
3/5/2021	HDR	CORRESPOND WITH TEAM REGARDING PROPOSED LEGISLATION IN NJ. RECEIVE AND REVIEW FINAL LETTER FILED WITH THE COURT REGARDING DISCOVERY DISPUTE.	0.3	\$159.00
3/5/2021	HDR	ATTEND TO CORRESPONDENCE TO JUDGE WILLIAMS REGARDING DISCOVERY DISPUTE. INTERNAL CORRESPONDENCE REGARDING SAME. DEVELOP STRATEGY.	1.2	\$636.00
3/5/2021	TJO	ELECTRONICALLY FILE LETTER TO JUDGE WILLIAMS (0.2); CONTINUE PREPARING FOR ANTHONY DEPOSITION (7.0); TELEPHONE CONFERENCE WITH D. DWYER REGARDING DEPOSITION PREPARATION (0.5).	7.7	\$4,851.00
3/5/2021	MH	FINALIZE INSTRUCTIONS MEMOS FOR J. RUE'S CLIENTS ON HOW TO PRODUCE ESI AND ATTEND TO FOLLOW-UP ON STATUS OF ESI.	1.6	\$376.00
3/7/2021	HDR	CORRESPOND WITH TJO REGARDING UPCOMING MEET AND CONFER WITH ADVERSARY. DEVELOP STRATEGY.	0.3	\$159.00
3/8/2021	HDR	RECEIVE AND REVIEW SUPPLEMENTAL DOCUMENT PRODUCTION FORM PLAINTIFFS.	0.1	\$53.00
3/8/2021	TJO	REVIEW OSEPP MANUAL RECEIVED FROM D. DWYER (0.7); BATES STAMP OPRA RESPONSE RECEIVED FROM D. DWYER AND PRODUCE TO STATE (0.4); REVISE DEPOSITION OUTLINE AND ADD ADDITIONAL EXHIBITS TO EXHIBIT SHARE IN LIGHT OF MANUAL (3.9).	5.0	\$3,150.00
3/8/2021	MH	ATTEND TO COORDINATION WITH RUE FIRM ON PRODUCTION OF ESI AND DRAFT INSTRUCTIONS ON CONVERSION TO .OLM ON MAC FOR PRODUCTION.	1.5	\$352.50
3/9/2021	HDR	ATTEND TO PROPOSED REDACTIONS REGARDING OPPOSITION TO REQUEST FOR LEAVE TO STAY. FILED COMMUNICATION REGARDING DOCUMENT PRODUCTION. DEVELOP STRATEGY WITH CO COUNSEL.	0.2	\$106.00

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3/9/2021	TJO	REVIEW DOCUMENT DEMANDS TO FIND DEMAND ENCOMPASSING STATEMENT IN LEGISLATIVE FISCAL STATEMENT (0.2); DRAFT LETTER TO K. SORANNO FORWARDING LEGISLATIVE FISCAL STATEMENT AND DEMANDING COPY OF NJDOE REPLY TO 2020 DISCUSSION POINTS (0.2); EMAIL DRAFT OF LETTER TO CO-COUNSEL (0.1); REVIEW COMMENTS ON LETTER FROM CO-COUNSEL (0.1); FINALIZE LETTER AND EMAIL TO K. SORANNO (0.2); REVIEW TEXT ORDER FROM COURT REGARDING SCHEDULING CALL FOR FRIDAY (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING HIS PARATICIPATION IN CALL (0.1); REVIEW EMAILS FROM D. DWYER REGARDING ANTHONY DEPOSITION PREPARATION (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING ANTHONY DEPOSITION PREPARATION (0.2).	1.3	\$819.00
3/10/2021	HDR	DEVELOP STRATEGY REGARDING CORRESPOND TO ADVERSARY REGARDING DOC REQUEST TO C. ANTHONY DEPOSITION.	0.3	\$159.00
3/10/2021	TJO	CONTINUE PREPARING FOR DEPOSITION (1.0); DEPOSE CATHERINE ANTHONY (5.5); DRAFT LETTER TO K. SORANNO REQUESTING DOCUMENTS FROM ANTHONY DEPOSITION (0.6); DRAFT EMAIL TO CO-COUNSEL REGARDING FORWARDING DRAFT OF LETTER FOR COMMENT (0.1); REVIEW COMMENT FROM D. DWYER AND REVISE LETTER (0.1).	7.3	\$4,599.00
3/10/2021	GWB	ATTEND THE DEPOSITION OF CATHERINE ANTHONY AND ASSIST TJO WITH DEPOSITION EXHIBITS.	5.5	\$2,447.50
3/10/2021	MH	DRAFT ADDITIONAL INSTRUCTIONS MEMO FOR RUE'S OFFICE ON CONVERSION TO .OLM ON MAC AND SUPPLEMENTAL FORMAT CHANGE TO .PST FOR USE IN WINDOWS ENABLE DEVICES.	1.5	\$352.50
3/11/2021	HDR	CORRESPOND WITH CO COUNSEL W/R/T ESI STATUS.	0.1	\$53.00
3/11/2021	TJO	FINALIZE LETTER TO K. SORANNO REGARDING DOCUMENT REQUESTS FROM ANTHONY DEPOSITION (0.1); EMAIL LETTER TO K. SORANNO (0.1); REVIEW EMAIL FROM L. QUARTOLO REGARDING STATUS OF ESI PRODUCTION BY RUE'S OFFICE (0.1); CONFER WITH PARALEGAL (MH) REGARDING SAME (0.2); DRAFT EMAIL TO J. RUE AND D. SOUTAR REGARDING QUARTOLO EMAIL (0.2); REVIEW RESPONSIVE EMAIL FROM J. RUE (0.1).	0.8	\$504.00
3/11/2021	MH	ATTEND TO COORDINATION WITH RUE FIRM ON STATUS OF ESI, FINALIZE COMCAST INSTRUCTIONS MEMO AND DRAFT HOTMAIL INSTRUCTIONS MEMO ON CONVERSION FOR ESI PRODUCTION.	2.8	\$658.00
3/12/2021	TJO	PREPARE FOR CALL WITH JUDGE WILLIAMS (1.3); TELEPHONE CONFERNCE WITH COURT (0.8); TELEPHONE CONFERENCE WITH D. SOUTAR AND D. DWYER REGARDING CALL WITH JUDGE WILLIAMS (0.4).	2.5	\$1,575.00

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3/16/2021	HDR	RECEIVE/REVIEW ORDER OF COURT REGARDING DELIBERATIVE PROCESS PRIVILEGE. CORRESPOND WITH CO COUNSEL REGARDING SAME. DEVELOP STRATEGY.	0.2	\$106.00
3/16/2021	TJO	SERVE SUPPLEMENTAL PRODUCTION OF DOCUMENTS BY MARVIN ON DEFENDANTS (0.2); REVIEW TEXT ORDER FROM COURT REGARDING BRIEFING SCHEDULE ON DELIBERATIVE PROCESS PRIVILEGE ISSUE (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING ASSIGNMENT OF DRAFTING OF BRIEF (0.2); ATTEND ZOOM CONFERENCE WITH J. RUE AND D. SOUTAR REGARDING ESI ISSUES (0.3); CONFER WITH PARALEGAL (MH) REGARDING ASSISTANCE TO RUE FIRM TO RETRIEVE ESI (0.2); REVIEW EMAIL FROM COURT REPORTER SENDING ZOOM LINK (0.1); DRAFT EMAIL TO K. SORANNO REGARDING SCHEDULING OF DEPOSITIONS (0.1); REVIEW EMAIL FROM J. RUE AND DRAFT RESPONSIVE EMAIL REGARDING FERPA ISSUE DURING CONFERENCE CALL WITH JUDGE WILLIAMS (0.1); REVIEW EMAIL FROM L. QUARTOLO REGARDING LIST OF CASES DATING BACK TO 2011 AND WHEN DECISIONS WERE RENDERED (0.1); CONFER WITH ASSOC. (DC) REGARDING PREPARATION OF BRIEF ON DELIBERATIVE PROCESS PRIVILEGE (0.4); REVIEW DOCUMENT PRODUCTION, ANSWERS TO INTERROGATORIES AND FORWARD DOCUMENTS TO D. CRAMER FOR MOTION (1.7).	3.5	\$2,205.00
3/16/2021	MH	ATTEND TO COORDINATION WITH RUE FIRM REGARDING ESI AND CONFERENCE ON THE SAME.	0.4	\$94.00
3/17/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING DELIBERATIVE PROCESS PRIVILEGE. DEVELOP STRATEGY REGARDING SAME.	0.1	\$53.00
3/17/2021	TJO	REVIEW DOCKET OF PROVIDENCE PEDIATRICS CASE REGARDING JUDGE WILLIAM'S RULING ON DELIBERATIVE PROCESS PRIVILEGE ISSUE (0.4); EMAIL ASSOC. (DC) REGARDING FORWARDING LETTER BRIEFS FROM PROVIDENCE PEDIATRICS CASE (0.1); PLACE TELEPHONE CALL TO DAG L. FICHERA REGARDING OAL SUBPOENA (0.1); CONFER WITH ASSOC. (DC) REGARDING ANSWER DC'S QUESTIONS SO HE CAN START DRAFTING BRIEF (0.2); REVIEW FILE AND FORWARD ADDITIONAL DOCUMENTS REQUESTED BY ASSOC. (DC) (0.5).	1.3	\$819.00
3/17/2021	DDC	REVIEW DOCUMENTS FOR USE AS EXHIBITS IN MOTION TO COMPEL.	4.5	\$2,025.00
3/17/2021	DDC	BEGIN LEGAL RESEARCH REVIEW FOR MOTION TO COMPEL.	1.0	\$450.00
3/18/2021	HDR	CORRESPONDENCE REGARDING STRATEGY REGARDING OAL SUBPOENA.	0.2	\$106.00

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3/18/2021	TJO	REVIEW EMAILS EXCHANGED BETWEEN RUE'S FIRM AND ASSOC. (MH) REGARDING ESI RETRIEVAL (0.1); TELEPHONE CONFERENCE WITH L. FICHERA REGARDING OAL SUBPOENA (0.1); DRAFT EMAIL TO CO-COUNSEL REGARDING SUMMARIZING CALL WITH FICHERA (0.2).	0.4	\$252.00
3/18/2021	DDC	CONTINUE CASE LAW RESEARCH REGARDING MOTION TO COMPEL.	4.2	\$1,890.00
3/19/2021	TJO	BEGIN REVIEWING STATE'S SUPPLEMENTAL PRODUCTION.	0.6	\$378.00
3/19/2021	DDC	REVIEW DEFENDANTS' REVISED PRIVILEGE LOG.	0.4	\$180.00
3/19/2021	MH	ATTEND TO CALL WITH PLAINTIFFS' COUNSEL ON ESI AND PREPARATION FOR THE SAME.	0.7	\$164.50
3/21/2021	HDR	TELCON AND CORRESPOND WITH TJO REGARDING STRATEGY REGARDING DISCOVERY AND DEPOSITIONS. RECEIVE AND REVIEW CORRESPONDENCE FROM ADVERSARY TO COURT REGARDING DISCOVERY ISSUES.	0.4	\$212.00
3/21/2021	DDC	WORK ON DRAFT BRIEF IN SUPPORT OF MOTION TO COMPEL.	1.6	\$720.00
3/22/2021	HDR	REVIEW/ANALYZE CO-COUNSEL'S DELIBERATIVE PROCESS MEMO.	0.3	\$159.00
3/22/2021	HDR	REVIEW CORRESPONDENCE REGARDING ANALYSIS REGARDING SUPPLEMENTAL DOCUMENTS PRODUCTION. DEVELOP STRATEGY.	0.3	\$159.00
3/22/2021	TJO	CONTINUE REVIEW OF STATE'S SUPPLEMENTAL DOCUMENT PRODUCTION FROM 3/19 (0.6); EMAIL J. RUE AND C. REISMAN REGARDING SAMPLING OF CASES (0.1).	0.7	\$441.00
3/22/2021	DDC	CONTINUE WORK ON DRAFT BRIEF IN SUPPORT OF MOTION TO COMPEL.	3.5	\$1,575.00
3/22/2021	DDC	LEGAL RESEARCH IN RELATION TO DRAFT BRIEF IN SUPPORT OF MOTION TO COMPEL.	4.7	\$2,115.00
3/23/2021	TJO	REVIEW EMAIL FROM L. FICHERA REGARDING SERVICE OF COPY OF SUBPOENAS ON OAL (0.1); DRAFT EMAIL TO C. HENDRICKS REGARDING FORWARDING COPY OF SUBPOENAS TO OAL (0.2); BEGIN REVIEWING DRAFT BRIEF PREPARED BY ASSOC. (DC) REGARDING DELIBERATIVE PROCESS PRIVILEGE (0.2).	0.5	\$315.00
3/23/2021	DDC	FINISH DRAFT BRIEF IN SUPPORT OF MOTION TO COMPEL.	6.0	\$2,700.00
3/24/2021	HDR	RECEIVE AND REVIEW DEPOSITION TRANSCRIPT OF C. ANTHONY TRANSCRIPT.	0.1	\$53.00
3/24/2021	HDR	INTERNAL CORRESPONDENCE REGARDING RULE 45 SUBPOENA TO OAL, AND SERVICE AND EXTENSION OF RESPONSE REGARDING SAME.	0.1	\$53.00

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3/24/2021	TJO	REVIEW DRAFT OF BRIEF REGARDING MOTION TO COMPEL REGARDING DELIBERATIVE PROCESS PRIVILEGE (0.3); CONFER WITH ASSOC. (DC) REGARDING COMMENTS ON BRIEF (0.2).	0.5	\$315.00
3/24/2021	DDC	REVISIONS TO DRAFT BRIEF IN SUPPORT OF MOTION TO COMPEL FOLLOWING COMMENT FROM PARTNER.	4.0	\$1,800.00
3/25/2021	TJO	REVISE BRIEF REGARDING MOTION TO COMPEL REGARDING DELIBERATIVE PROCESS PRIVILEGE (2.2); EMAIL DRAFT OF BRIEF TO J. RUE, D. SOUTAR AND C. REISMAN (0.1).	2.3	\$1,449.00
3/25/2021	MH	ATTEND TO RESEARCH ON PST CONVERSION ON PRIVATELY OWNED EMAIL AND MAC OPERATING SYSTEM OLM FORMAT FOR ESI PRODUCTION.	1.1	\$258.50
3/26/2021	HDR	ATTEND TO CORRESPOND TO ADVERSARY REQUESTING ADDITIONAL SPECIAL EDUCATION FILES.	0.1	\$53.00
3/26/2021	TJO	REVIEW AND EDIT BRIEF REGARDING MOTION ON DELIBERATIVE PROCESS PRIVILEGE (0.8); DRAFT LETTER TO OPPOSING COUNSEL REGARDING UNRESOLVED DISCOVERY ISSUES (1.4); EMAIL DRAFT OF LETTER TO CO-COUNSEL FOR REVIEW AND COMMENT (0.1); REVIEW COMMENTS AND REVISE LETTER (0.2); EMAIL LETTER TO OPPOSING COUNSEL (0.1).	2.6	\$1,638.00
3/26/2021	DDC	REVISIONS TO BRIEF I/S/O DELIBERATIVE PROCESS PRIVILEGE.	2.4	\$1,080.00
3/29/2021	MH	ATTEND TO COORDINATION WITH RUE FIRM ON ACCESS TO PLAINTIFFS' EMAILS FOR ESI PRODUCTION AND UPDATE OF MEMO REGARDING THE SAME.	0.6	\$141.00
3/30/2021	HDR	RECEIVE/REVIEW CORRESPONDENCE TO ADVERSARY REGARDING DISCOVERY FOLLOW UP.	0.1	\$53.00
3/30/2021	TJO	REVIEW EMAIL FROM R. THURSTON AND RESPOND (0.1); REVIEW AND COMMENT ON BRIEF POINT REGARDING DELIBERATIVE PROCESS PRIVILEGE MOTION (0.2).	0.3	\$189.00
3/30/2021	DDC	LEGAL RESEARCH ON WAIVER ARGUMENT.	2.5	\$1,125.00
3/30/2021	DDC	REVISIONS TO BRIEF IN SUPPORT OF MOTION TO COMPEL.	1.5	\$675.00
3/31/2021	HDR	REVIEW CORRESPONDENCE TO ADVERSARY REQUESTING DOCUMENTS REFERENCED DURING C. ANTHONY DEPOSITION.	0.1	\$53.00
3/31/2021	HDR	RECEIVE/REVIEW MINUTES REGARDING 3.12.21 STATUS CONFERENCE WITH COURT.	0.1	\$53.00
3/31/2021	TJO	EMAIL ASSOC. (DC) REGARDING STATUS OF DELIBERATIVE PROCESS PRIVILEGE BRIEF.	0.1	\$63.00
3/31/2021	DDC	LEGAL RESEARCH REGARDING WAIVER OF PRIVILEGE.	1.5	\$675.00

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Date	Person	Description of Services	Hours	Amount
4/1/2021	HDR	RECEIVE/REVIEW NOTICE OF WITHDRAWAL OF OPPOSING COUNSEL A. ROSSAEU.	0.1	\$53.00
4/1/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING DOCUMENT REQUEST RELATING TO C. ANTHONY DEPOSITION.	0.1	\$53.00
4/1/2021	TJO	REVISE BRIEF REGARDING MOTION TO COMPEL REGARDING DELIBERATIVE PROCESS PRIVILEGE.	0.7	\$441.00
4/1/2021	MH	RUN TERM SEARCHES IN S. BROWN'S EMAIL, REVIEW RESULTS OF THE SAME, COVERT RESPONSIVE EMAILS TO .PST FOR ESI PRODUCTION, AND DRAFT SUMMARY TO TEAM.	5.1	\$1,198.50
4/2/2021	MH	ATTEND TO PLAINTIFFS' ESI AND PROCEDURE/LOGISTICS WITH RUE FIRM.	0.7	\$164.50
4/3/2021	MH	ATTEND TO PLAINTIFFS' ESI AND PROCEDURE/LOGISTICS WITH RUE FIRM.	0.3	\$70.50
4/4/2021	HDR	REVIEW/ANALYZE DELIBERATIVE PROCESS PRIV. MEMO PREPARED BY CO COUNSEL C. REISMAN.	0.1	\$53.00
4/5/2021	MH	ATTEND TO PLAINTIFFS' ESI, CALL WITH T. O'LEARY, UPDATE STATUS MEMO, AND CALL WITH RUE PARALEGAL, AND PROCEDURE/LOGISTICS WITH RUE FIRM.	2.8	\$658.00
4/6/2021	HDR	CORRESPOND WITH CO-COUNSEL REGARDING PROPOSED MOTION TO COMPEL REGARDING DELIBERATIVE PROCESS PRIVILEGE.	0.1	\$53.00
4/6/2021	HDR	EXCHANGE CORRESPONDENCE WITH ADVERSARY REGARDING DISCOVERY STATUS AND DOCUMENT PRODUCTION.	0.2	\$106.00
4/6/2021	HDR	RECEIVE/REVIEW TEXT ORDER REGARDING FORTHCOMING STATUS CONF. WITH JUDGE WILLIAMS.	0.1	\$53.00
4/6/2021	TJO	TELEPHONE CONFERENCE WITH COURT (0.8); TELEPHONE CONFERENCE WITH D. SOUTAR REGARDING CALL WITH COURT (0.2); REVISE BRIEF REGARDING DELIBERATIVE PROCESS PRIVILEGE (4.9); EMAIL REVISED BRIEF TO CO-COUNSEL (0.1).	6.0	\$3,780.00
4/6/2021	DDC	DRAFT SUPPORTING PAPERS FOR MOTION TO COMPEL.	3.4	\$1,530.00
4/7/2021	HDR	RECEIVE/REVIEW SCHEDULING ORDER.	0.1	\$53.00
4/7/2021	TJO	EMAIL J. RUE AND D. SOUTAR REGARDING SERVICE OF 30(B)(6) NOTICE REGARDING NJDOE DATABASE (0.1); REVIEW RESPONSIVE EMAILS FROM J. RUE AND D. SOUTAR AND RESPOND (0.1); REVIEW TRANSCRIPT OF ORAL ARGUMENT FROM FEBRUARY 2020 AND PROVIDE CITES TO ASSOC. (DC) FOR INCLUSION IN BRIEF REGARDING DELIBERATIVE PROCESS PRIVILEGE (1.3).	1.5	\$945.00
4/7/2021	DDC	REVISIONS TO BRIEF AND DECLARATION OF COUNSEL IN SUPPORT OF MOTION TO COMPEL.	6.5	\$2,925.00

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4/8/2021	HDR	REVIEW EDIT AND REVISE BRIEF AND MOTION PAPERS ON MOTION TO COMPEL.	1.5	\$795.00
4/8/2021	HDR	RECEIVE AND REVIEW ORDER OF COURTS REGARDING CASE SCHEDULE. RECEIVE COMMENTS FROM CO COUNSEL REGARDING MOTION TO COMPEL.	0.3	\$159.00
4/8/2021	TJO	REVISE BRIEF REGARDING MOTION TO COMPEL REGARDING DELIBERATIVE PROCESS PRIVILEGE.	4.5	\$2,835.00
4/9/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING 2020 RESOLUTION MEMO. REVIEW SAME. CORRESPOND WITH CO COUNSEL REGARDING SAME. DEVELOP STRATEGY.	0.5	\$265.00
4/9/2021	HDR	REVIEW CORRESPONDENCE REGARDING UPDATE REGARDING COURT CONFERENCE WITH JUDGE WILLIAMS; ATTEND TO 30B6 DEPO NOTICE TO DEFENDANTS; RECEIVE/REVIEW LATEST VERSION OF DISPUTE MANUAL FROM DEFENDANTS.	0.6	\$318.00
4/9/2021	HDR	EDIT/REVIEW PREPARE MOTION TO COMPEL DIRECTED TO DEFENDANTS REGARDING DELIB PROCESS PRIVILEGE.	0.8	\$424.00
4/9/2021	HDR	RECEIVE/REVIEW MINUTES OF 4.6.21 CONFERENCE WITH THE COURT.	0.1	\$53.00
4/9/2021	TJO	FINALIZE BRIEF REGARDING DELIBERATIVE PROCESS PRIVILEGE ISSUE (2.9); DRAFT RULE 30(B)(6) SUBPOENA REGARDING DATA BASE (0.4).	3.3	\$2,079.00
4/9/2021	MH	ATTEND TO MOTION TO COMPEL/SUPPORTING PAPERS AND ELECTRONICALLY FILE THE SAME.	2.1	\$493.50
4/9/2021	MH	ATTEND TO EMAILS WITH RUE FIRM REGARDING; PLAINTIFFS' ESI AND TERM SEARCHES.	0.2	\$47.00
4/12/2021	HDR	REVIEW COMMUNICATIONS REGARDING 30B6 NOTICE REGARDING EXCEL DATABASE.	0.2	\$106.00
4/12/2021	TJO	REVISE DESIGNEE NOTICE AND FINALIZE SAME (0.2); DRAFT EMAIL TO CO-COUNSEL FORWARDING REVISED DESIGNEE NOTICE (0.1); STAFF DIRECTION (LW) REGARDING RUNNING OF CHANGE COMPARISON ON NJDOE PROCEDURES MANUAL (0.2); REVIEW CHANGES TO MANUAL FROM CHANGE COMPARISON (0.4); EXCHANGE EMAILS WITH J. RUE REGARDING CHANGES IN MANUAL (0.1); DRAFT LETTER TO K. SORANNO REGARDING SERVING DESIGNEE NOTICE (0.2).	1.2	\$756.00
4/13/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING 30b6 DEPO NOTICE.	0.1	\$53.00
4/14/2021	HDR	REVIEW CORRESPONDENCE REGARDING ADDITION TO DEFENSE COUNSEL.	0.1	\$53.00

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4/14/2021	TJO	REVIEW EMAIL FROM K. SORRANO REGARDING DESIGNEE DEPOSITION ON DATABASE AND DRAFT RESPONSIVE EMAIL TO K. SORANNO (0.1); REVIEW EMAIL FROM R. THURSTON REGARDING DISCOVERY FROM NJDOE (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING DISCOVERY SUGGESTED BY THURSTON (0.2); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1); REVIEW EMAIL EXCHANGE BETWEEN J. RUE AND THURSTON REGARDING SAME (0.1).	0.6	\$378.00
4/14/2021	MH	ATTEND TO RESEARCH ON COMCAST CONVERSION FOR ESI AND UPDATE STATUS MEMO.	1.2	\$282.00
4/15/2021	HDR	CORRESPOND WITH TEAM REGARDING DEPOSITION TRANSLATION.. DEVELOP STRATEGY.	0.2	\$106.00
4/15/2021	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING TRANSLATOR FOR CP (0.2); EMAIL PARTNER (HDR) REGARDING SAME (0.1).	0.3	\$189.00
4/16/2021	HDR	CORRESPOND WITH TJO REGARDING OAL SUBPOENA RESPONSE UPDATE.	0.1	\$53.00
4/16/2021	TJO	EMAIL D. SOUTAR AND J. RUE REGARDING EXHIBITS FROM CRANDOL DEPOSITION (0.1); REVIEW RESPONSIVE EMAIL FROM D. SOUTAR (0.1); DOWNLOAD AND REVIEW EXHIBITS IN PREPARATION FOR MARVIN DEPOSITION (0.3); EMAIL COURT REPORTER TO ORDER TRANSCRIPT OF CRANDOL DEPOSITION (0.1); REVIEW EMAIL FROM L. FICHERA REQUESTING EXTENSION TO RESPOND TO OAL SUBPOENA (0.1).	0.7	\$441.00
4/20/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING 30B6 NOTICE.	0.1	\$53.00
4/20/2021	TJO	REVIEW EMAIL FROM K. SORANNO AND FORWARD TO CO-COUNSEL.	0.1	\$63.00
4/21/2021	HDR	CORRESPOND WITH CO COUNSEL REGARDING PROPOSED LETTER REGARDING 30b6 NOTICE SERVED ON DEFENDANTS.	0.1	\$53.00
4/21/2021	TJO	REVIEW AND COMMENT ON DRAFT BRIEF (1.3); EMAIL COUNSEL REGARDING COMMENTS ON BRIEF (0.1); REVIEW LETTER FROM K. SORANNO REGARDING OBJECTIONS TO 30(B)(6) NOTICE (0.1); DRAFT RESPONSIVE LETTER TO K. SORANNO AND CIRCULATE DRAFT OF LETTER TO CO-COUNSEL FOR REVIEW (2.3).	3.8	\$2,394.00
4/22/2021	HDR	CORRESPOND WITH CO-COUNSEL REGARDING 30B6 NOTICE REGARDING EXCEL DATABASE.	0.3	\$159.00
4/22/2021	HDR	REVIEW COMMENTS REGARDING PROPOSED CORRESPENCE TO ADVERSARY REGARDING 30B6 NOTICE.	0.1	\$53.00
4/22/2021	TJO	EXCHANGE MULTIPLE EMAILS WITH R. THURSTON REGARDING COMMENTS ON BRIEF.	0.5	\$315.00

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4/22/2021	TJO	REVIEW EMAIL FROM R. THURSTON REGARDING COMMENTS ON DRAFT LETTER TO SORANNO REGARDING 30(B)(6) NOTICE (0.1); REVISE LETTER (0.9); EMAIL DRAFT OF LETTER TO CO-COUNSEL (0.1); REVIEW COMMENTS FROM D. DWYER (0.1); REVIEW EMAIL FROM J. RUE REGARDING COMMENTING ON D. DWYER'S COMMENTS (0.1); DRAFT RESPONSIVE EMAIL (0.1).	1.3	\$819.00
4/22/2021	MH	ATTEND TO INSTRUCTIONS MEMO ON .PST CONVERSION.	0.7	\$164.50
4/23/2021	HDR	RECEIVE AND REVIEW DEFS. DEPOSITION NOTICE REGARDING A.S. FAMILY.	0.1	\$53.00
4/23/2021	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING LETTER TO K. SORANNO (0.1); REVIEW COMMENTS FROM J. RUE ON LETTER TO SORANNO REGARDING 30(B)(6) DEPOSITION (0.2); REVISE LETTER TO K. SORANNO AND EMAIL SAME (0.3).	0.6	\$378.00
4/25/2021	HDR	REVIEW CORRESPONDENCE REGARDING A.S. DEPOSITION NOTICE. CORRESPOND WITH CO COUNSEL REGARDING SAME.	0.2	\$106.00
4/26/2021	HDR	RECEIVE/REVIEW OPPOSITION TO MOTION TO COMPEL REGARDING DELIBER. PROCESS PRIV.	0.1	\$53.00
4/27/2021	DDC	REVIEW DEFENDANTS' OPPOSITION TO OUR MOTION TO COMPEL.	1.4	\$630.00
4/27/2021	MH	UPDATE MEMO ON HOTMAIL AND OUTLOOK CONVERSION TO .PST FOR ESI.	0.8	\$188.00
4/28/2021	HDR	DRAFT AND REVISE LETTER TO ADVERSARY REGARDING DEFICIENT PRIVILEGE LOG.	1.1	\$583.00
4/28/2021	TJO	DOWNLOAD AND REVIEW CERTIFICATION OF K. SORANNO (0.2); EMAIL PARTNER (HDR) REGARDING CHALLENGE TO ATTORNEY CLIENT PRIVILEGE ENTRY IN 3/19/21 PRIVILEGE LOG (0.1); REVISE AND FINALIZE LETTER TO K. SORANNO RECEIVED FROM HDR REGARDING CHALLENGE TO PRIVILEGE ENTRY (0.2).	0.5	\$315.00
4/29/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING PROPOSED EXTENSION REGARDING RESPONSE TO OAL SUBPOENA.	0.1	\$53.00
4/29/2021	TJO	REVIEW EMAIL FROM D. KALISKY REGARDING PRIVILEGE LOG ISSUE (0.1); REVIEW EMAIL FROM L. FISCHERA REGARDING OAL EXTENSION REQUEST TO RESPOND TO SUBPOENA AND DRAFT RESPONSIVE EMAIL (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING TRANSCRIPT FROM BROWN-CRANDOL DEPOSITION (0.2); EMAIL COURT REPORTER REGARDING STATUS OF PREPARATION OF TRANSCRIPT (0.1).	0.5	\$315.00
4/30/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING DISPUTE REGARDING EXCEL DATABASE.	0.1	\$53.00
5/1/2021	TJO	REVIEW EMAIL FROM K. SORANNO AND RESPOND.	0.1	\$63.00

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5/3/2021	HDR	REVIEW CORRESPONDENCE REGARDING PROPOSED MEET & CONFER REGARDING EXCEL DATABASE.	0.1	\$53.00
5/3/2021	TJO	REVIEW NOTICE OF APPEARANCE FILED BY E. HERLIHY.	0.1	\$63.00
5/3/2021	MH	DRAFT EMAIL TO HAILE-SELASSIE REQUESTING ADDITIONAL INFORMATION ON EMAIL PLATFORMS TO TAILOR INSTRUCTIONS TO SPECIFIC NEEDS.	0.3	\$70.50
5/4/2021	TJO	TELEPHONE CONFERENCE WITH K. SORANNO REGARDING DATABASE (0.2); EMAIL CO-COUNSEL REGARDING CALL WITH SORANNO (0.1).	0.3	\$189.00
5/7/2021	HDR	REVIEW CORRESPONDENCE REGARDING DISCOVERY PRODUCTION AND RESPONSE TO OAL SUBPOENA.	0.2	\$106.00
5/7/2021	TJO	FORWARD MULTIPLE EMAILS RECEIVED FROM ADVERSARY COUNSEL TO CO-COUNSEL.	0.2	\$126.00
5/7/2021	MH	ATTEND TO RESEARCH FOR COMCAST CONVERSION FOR ESI PRODUCTION, FINALIZE INSTRUCTIONS MEMO, AND FOLLOW-UP WITH RUE FIRM REQUESTING ADDITIONAL INFORMATION REGARDING THE SAME.	1.5	\$352.50
5/8/2021	TJO	TELEPHONE CONFERENCE WITH J. RUE AND D. GILES REGARDING DEPOSITION PREPARATION.	0.6	\$378.00
5/10/2021	HDR	REVIEWED CORRESPONDENCE REGARDING DISCOVERY ISSUES; REVIEWED CORRESPONDENCE REGARDING MM DEPOSITION SCHEDULE.	0.3	\$159.00
5/10/2021	TJO	REVIEW EMAILS FROM D. KALISKY AND L. FISCHERA WHICH WERE RECEIVED ON MAY 7TH (0.7); TELEPHONE CONFERENCE WITH J. RUE REGARDING SWEETEN DEPOSITION (0.4); REVIEW DOCUMENT PRODUCTIONS TO SELECT DOCUMENTS TO PREPARE SWEETEN FOR HER DEPOSITION (0.9); BEGIN REVIEWING TRANSCRIPT OF CRANDOL BROWN DEPOSITION (1.7).	3.7	\$2,331.00
5/11/2021	HDR	REVIEW CORRESPONDENCE REGARDING OAL SUBPOENA.	0.1	\$53.00
5/11/2021	TJO	PREPARE FOR PREP SESSION OF A. SWEETEN (0.2); PREPARE A. SWEETEN FOR DEPOSITION (1.9); TELEPHONE CONFERENCE WITH J. RUE REGARDING SWEETEN DEPOSITION (0.2); REVIEW DOCUMENTS PRODUCED BY OAL IN RESPONSE TO SUBPOEANA (1.7); BEGIN DRAFTING LETTER TO L. FICHERA: REGARDING DEFICIENCIES IN OAL SUBPOENA RESPONSE. (0.4).	4.4	\$2,772.00
5/11/2021	MH	ATTEND TO ADDITIONAL ESI AND UPDATES TO INSTRUCTIONS MEMOS FOR PLAINTIFFS' EMAIL EXTRACTION TO .PST FOR ESI PRODUCTION AND COORDINATION WITH RUE FIRM RUE FIRM REGARDING THE SAME.	3.1	\$728.50
5/12/2021	HDR	TELECONF WITH TJO REGARDING STRATEGY REGARDING OAL SUBPOENA.	0.2	\$106.00

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5/12/2021	HDR	REVIEW CORRESPONDENCE REGARDING RESPONSE TO OAL SUBPOENA.	0.1	\$53.00
5/12/2021	TJO	CONTINUE DRAFTING LETTER TO L. FICHERA REGARDING DEFICIENCIES IN 2.26.21 SUBPOENA RESPONSE (2.1); REVIEW EMAIL FROM L. FICHERA AND ATTACHMENT THERETO REGARDING SUPPLEMENTATION OF SUBPOENA RESPONSE (0.4); DRAFT LETTER TO L. FICHERA REGARDING DEFICIENCIES IN 3.2.21 SUBPOENA RESPONSE (0.8); DRAFT EMAIL TO CO-COUNSEL REGARDING FORWARDING DRAFT LETTERS TO FICHERA FOR REVIEW AND COMMENT (0.2); TELEPHONE CONFERENCE WITH D. DWYER REGARDING POSITION THAT NJDOE TOOK IN OPRA CASE AND IMPACT OF THAT POSITION ON CURRENT LITIGATION (0.6); EMAIL K. SORRANO REGARDING AS DEPOSITION (0.1); EMAIL J. RUE REGARDING NEED TO SHOW INTERROGATORY ANSWERS TO A.S. PRIOR TO HER DEPOSITION (0.1).	4.3	\$2,709.00
5/13/2021	HDR	ATTEND TO NOA'S FOR DEFENDANTS; REVIEW CORRESPONDENCE REGARDING DISCOVERY DISPUTE LETTER.	0.3	\$159.00
5/13/2021	HDR	REVIEW CORRESPONDENCE REGARDING 5.14.21 DEPOSITION.	0.1	\$53.00
5/13/2021	TJO	DRAFT LETTER TO K. SORANNO REGARDING OUTSTANDING DISCOVERY ISSUES (2.1); CONTINUE REVIEW OF TRANSCRIPT OF SHAYE BROWN DEPOSITION (1.4).	3.5	\$2,205.00
5/13/2021	NMT	ATTEND TO DRAFT OF SUBPOENA TO OFFICE OF LEGISLATIVE SERVICES.	0.3	\$70.50
5/14/2021	HDR	DRAFT/REVISE SUBPOENA TO OLS; REVIEW CORRESPONDENCE REGARDING OAL SUBPOENA.	1.3	\$689.00
5/14/2021	HDR	RECEIVE AND REVIEW OUTSTANDING DISCOVERY LETTER. CORRESP. WITH ADVERSARY REGARDING OAL SUBPOENA. ATTEND TO DRAFT DISCOVERY DEFICIENCY LETTER.	0.4	\$212.00
5/14/2021	TJO	TELEPHONE CONFERENCE WITH A.S. REGARDING PREPARATION FOR DEPOSITION (0.5); DEFEND AS IN DEPOSITION (6.3); FINALIZE LETTERS TO L. FICHERA (2 LETTERS) REGARDING OAL SUBPOENA COMPLIANCE AND EMAIL SAME TO FICHERA (0.3); FINALIZE LETTER TO K. SORANNO REGARDING DISCOVERY ISSUES AND EMAIL SAME TO SORANNO (0.2); TELEPHONE CONFERENCE WITH D. GILES REGARDING MM DEPOSITION (0.2); EMAIL K. SORANNO REGARDING MM AVAILABILITY FOR DEPOSITION (0.1); BEGIN REVIEW PRODUCTION RELATING TO MM TO SELECT DOCUMENTS TO PREPARE MM WITH (0.4).	8.0	\$5,040.00

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5/14/2021	MH	ATTEND TO ADDITIONAL ESI AND UPDATES TO INSTRUCTIONS MEMOS FOR PLAINTIFFS' EMAIL EXTRACTION TO .PST FOR ESI PRODUCTION AND COORDINATION WITH RUE FIRM RUE FIRM REGARDING THE SAME.	1.7	\$399.50
5/15/2021	HDR	CORRESPOND WITH ADVERSARY REGARDING MM DEPOSITION.	0.1	\$53.00
5/17/2021	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING DISCOVERY PRODUCTION.	0.1	\$53.00
5/17/2021	TJO	REVIEW DOCUMENT PRODUCTIONS TO SELECT DOCUMENTS TO USE WHEN PREPARING MILLIGAN FOR DEPOSITION.	2.8	\$1,764.00
5/18/2021	HDR	REVIEW CORRESPONDENCE REGARDING MM DEPOSITION NOTICE. INTERNAL CORRESPONDENCE REGARDING JUDGE WILLIAMS. TELECONFERENCE WITH TJO REGARDING DISCOVERY STRATEGY.	0.8	\$424.00
5/18/2021	TJO	CONFER WITH PARTNER (HDR) REGARDING SLOW PROGRESS OF DISCOVERY FROM STATE AND STRATEGY FOR OBTAINING EARLIER CONFERENCE WITH JUDGE WILLIAMS (0.4); CONTINUE PREPARING FOR CONFERENCE WITH M.M. (0.4); REVIEW CORRESPONDENCE WITH D. KALISKY (0.1); EMAIL D. GILES REGARDING KALISKY LETTER (0.1); PREPARE M.M. FOR DEPOSITION (1.9).	2.9	\$1,827.00
5/19/2021	HDR	CORRESPONDENCE WITH ADVERSARY REGARDING MM DEPOSITION.	0.1	\$53.00
5/19/2021	TJO	EMAIL D. KALISKY REGARDING MM DEPOSITION; REVIEW RESPONSIVE EMAIL AND DEPOSITION NOTICE FROM STATE.	0.1	\$63.00
5/21/2021	HDR	REVIEW CORRESPONDENCE REGARDING ESI STIP; REVIEW CORRESPONDENCE REGARDING DOCUMENT PRODUCTION.	0.2	\$106.00
5/21/2021	TJO	EXCHANGE MULTIPLE EMAILS WITH CO-COUNSEL REGARDING STRATEGY TO DOCUMENT DELAY IN PROCURING TRANSCRIPTS OF HEARINGS AND IMPACT ON OBTAINING TIMELY DECISION (0.3); REVISE SUBPOENA TO OLS AND NOTICE OF SUBPOENA (0.2); DRAFT TRANSMITTAL LETTER TO GUARANTEED SUBPOENA SERVICE REGARDING SERVICE OF OLS SUBPOENA (0.1); DRAFT LETTER TO K. SORANNO REGARDING ISSUANCE OF OLS SUBPOENA (0.1); DRAFT EMAIL TO L. FICHERA REGARDING FOLLOW-UP ON OAL SUBPOENAS (0.1); BEGIN REVIEW OF DOCUMENTS FORWARDED BY E. HERILHY (0.5).	1.3	\$819.00
5/24/2021	HDR	CORRESPOND REGARDING STIP EXTENDING TIME TO ANSWER.	0.1	\$53.00
5/24/2021	HDR	REVIEW CORRESPONDENCE REGARDING DRAFT LETTER TO DEFS REGARDING HERILY LETTER.	0.1	\$53.00

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5/24/2021	TJO	DRAFT SUPPLEMENTAL DOCUMENT REQUESTS TO NJDOE (1.1); DRAFT SUBPOENA TO OAL (1.1); DRAFT LETTER TO E. HERLIHY REGARDING RESPONDING TO STATE'S LETTER REGARDING OUTSTANDING DISCOVERY ISSUES (0.8); DRAFT EMAIL TO CO-COUNSEL REGARDING FORWARDING DRAFT DISCOVERY DEMANDS AND LETTER FOR REVIEW AND COMMENT (0.2); EXCHANGE EMAILS WITH J. RUE REGARDING NJDOE CASE STATUS REPORT (0.2).	3.2	\$2,016.00
5/25/2021	HDR	REVIEW CORRESPONDENCE REGARDING ADVERSARY REGARDING ESI STIP. REVIEW, FINALIZE AND SERVE ESI STIP.	1.0	\$530.00
5/25/2021	TJO	REVIEW J. RUE'S REVISIONS TO DRAFT LETTER TO E. HERLIHY AND REVISE REVISIONS (0.1); REVIEW EMAIL FROM D. KALISKY REGARDING NOTICING M.M. DEPOSITION AND RESPOND TO EMAIL (0.1).	0.2	\$126.00
5/26/2021	HDR	REVIEW CORRESPONDENCE REGARDING OAL SUBPOENA.	0.1	\$53.00
5/26/2021	TJO	REVISE AND FINALIZE LETTER TO E. HERLIHY REGARDING OUTSTANDING DISCOVERY ISSUES (0.2); EMAIL LETTER TO HERLIHY (0.1); DRAFT LETTER TO OPPOSING COUNSEL FORWARDING SECOND REQUEST FOR DOCUMENTS (0.1); SERVE DOCUMENT REQUESTS ON DEFENDANTS' COUNSEL (0.1); DRAFT NOTICE OF INTENT TO SERVE SUBPOENA (0.1); DRAFT LETTER TO OPPOSING COUNSEL REGARDING NOTICE OF INTENT TO SERVE SUBPOENA (0.1); EMAIL LETTER AND NOTICE OF INTENT TO SERVE SUBPOENA ON OPPOSING COUNSEL (0.1); DRAFT TRANSMITTAL LETTER TO ATTORNEY GENERAL'S OFFICE REGARDING SERVICE OF OAL SUBPOENA (0.1); ELECTRONICALLY SERVE OAL SUBPOENA (0.1); DRAFT EMAIL TO L. FICHERA AND REVIEW RESPONSIVE EMAIL (0.1).	1.1	\$693.00
5/26/2021	TJO	REVIEW EMAILS FROM R. THURSTON AND J. RUE REGARDING POTENTIAL DISCOVERY APPLICATION AND RESPOND (0.1); EMAIL D. GILES REGARDING CALL WITH MM PRIOR TO DEPOSITION (0.1).	0.2	\$126.00
5/27/2021	HDR	CORRESPOND WITH TEAM REGARDING PROPOSED LETTER TO DEFENDANTS REGARDING DISCOVERY.	0.1	\$53.00
5/28/2021	HDR	REVIEW CORRESPONDENCE REGARDING DEFENDANTS RESPONSE TO SUBPOENA.	0.1	\$53.00
6/1/2021	TJO	EXCHANGE EMAILS WITH D. GILES REGARDING PREPARATION SESSION WITH MM (0.1); EMAIL D. GILES REGARDING NEED TO ADJOURN MM'S DEPOSITION DUE TO PERSONAL CIRCUMSTANCES (0.1); DRAFT EMAIL TO ADVERSARY COUNSEL REGARDING SAME (0.2); REVIEW EMAIL FROM L. FICHERA AND RESPOND TO SCHEDULE MEET AND CONFER SESSION (0.1).	0.5	\$315.00
6/2/2021	MH	ATTEND TO FOLLOW-UP WITH RUE FIRM ON STATUS OF ESI COLLECTION FOR PRODUCTION.	0.2	\$47.00

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Date	Person	Description of Services	Hours	Amount
6/3/2021	TJO	EMAIL D. GILES REGARDING AVAILABILITY FOR MM DEPOSITION.	0.1	\$63.00
6/4/2021	TJO	EMAIL E. HERLIHY REGARDING CONFIRMING AVAILABILITY FOR DEPOSITION (0.1); TELEPHONE CONFERENCE WITH L. FICHERA REGARDING MEET AND CONFER REGARDING OAL SUBPOENA (0.4).	0.5	\$315.00
6/7/2021	HDR	RECEIVE AND REVIEW DEFS, AMENDED PRIVL. LOGS. CORRESP. WITH ADVERSARY REGARDING DELIB. PROCESS PRIVIL.	0.2	\$106.00
6/7/2021	TJO	DRAFT EMAIL TO CO-COUNSEL FORWARDING REVISED OAL PRIVILEGE LOGS RECEIVED FROM L. FICHERA (0.1); DRAFT EMAIL TO FICHERA FORWARDING MOTION REGARDING DELIBERATIVE PROCESS PRIVILEGE (0.1); REVIEW REVISED PRIVILEGE LOGS (0.2).	0.4	\$252.00
6/8/2021	HDR	REVIEW LTR. TO DEFENDANT W/R/T 5.21.21 CORRESP.	0.1	\$53.00
6/8/2021	TJO	DRAFT LETTER TO E. HERLIHY REGARDING FOLLOW-UP ON DISCOVERY (0.5); EMAIL DRAFT OF LETTER TO CO-COUNSEL FOR COMMENTS (0.1); REVIEW EMAIL FROM C. REISMAN REGARDING COMMENTS ON LETTER (0.1); REVIEW EMAIL FROM J. RUE REGARDING COMMENTS ON LETTER AND REVISE LETTER (0.2).	0.9	\$567.00
6/8/2021	MH	ATTEND TO PLAINTIFFS' PRODUCTION DOCUMENTS AND ESI.	3.1	\$728.50
6/9/2021	HDR	CORRESP. WITH DEFS. REGARDING SUPPL. DOCUMENT PRODUCTION.	0.1	\$53.00
6/9/2021	TJO	REVIEW CORRESPONDENCE FROM E. HERLIHY REGARDING REVISED DEPOSITION NOTICE (0.1); FINALIZE LETTER TO E. HERLIHY AND EMAIL SAME (0.1); REVIEW CORRESPONDENCE FROM C. KILKA REQUESTING DOCUMENT MENTIONED IN CORRESPONDENCE IN LG FILE (0.1); REVIEW LG FILE TO IDENTIFY MISSING DOCUMENT (0.2); EMAIL E. CANTY BARNES TO OBTAIN DOCUMENT REQUESTED BY KILKA (0.1); CONFER WITH PARALEGAL (MH) REGARDING SUPPLEMENTAL DOCUMENT PRODUCTION (0.2).	0.8	\$504.00
6/9/2021	MH	ATTEND TO PRODUCTION DOCUMENTS, DRAFT INDEX OF THE SAME, AND PREPARE SUPPLEMENTAL PRODUCTIONS VIA FTP.	2.9	\$681.50
6/11/2021	TJO	REVIEW EMAIL FROM D. GILES AND RESPOND REGARDING CONFLICT FOR MM REGARDING DEPOSITION.	0.1	\$63.00
6/14/2021	TJO	PREPARE FOR PREPARATION SESSION WITH L.G.	1.2	\$756.00
6/14/2021	MH	ATTEND TO TERM SEARCHES FOR PLAINTIFFS' ESI PRODUCTIONS.	3.1	\$728.50

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6/15/2021	TJO	PREPARE FOR ZOOM CONFERENCE WITH L.G. (0.2); PREPARE LG FOR DEPOSITION (1.9); EMAIL E. HERILHY CONFIRMING RESCHEDULED DATE FOR DEPOSITION OF MM (0.1); REVIEW RESPONSIVE EMAIL FROM HERILHY REGARDING ADVISING THAT WILL RESPOND TO PRIOR LETTERS REGARDING DISCOVERY ISSUES (0.1).	2.3	\$1,449.00
6/16/2021	HDR	REVIEW CORRESPONDENCE REGARDING DEPOSITION OF MM. ATTEND TO CORRESP. TO THE COURT REGARDING DISCOVERY ISSUES. ATTEND TO MOTION TO ENFORCE OAL SUBPOENAS.	0.6	\$318.00
6/16/2021	TJO	EXCHANGE EMAILS WITH LG REGARDING PHONE NUMBER FOR DEPOSITION (0.1); EMAIL ADVERSARY REQUESTING ZOOM LINK FOR DEPOSITION (0.1); REVIEW EMAIL FROM COURT REPORTER AND FORWARD ZOOM LINK FOR DEPOSITION TO CLIENT (0.1); TELEPHONE CONFERENCE WITH J. BURKE REGARDING DEPOSITION OF LG (0.1).	0.4	\$252.00
6/17/2021	HDR	ATTEND TO ISSUES REGARDING ESI STIP.	0.2	\$106.00
6/17/2021	HDR	REVIEW CORRESPONDENCE REGARDING OAL SUBPOENA.	0.1	\$53.00
6/17/2021	TJO	DOWNLOAD AND REVIEW EXHIBITS RECEIVED FROM C. BRANCH (0.4); DEFEND DEPOSITION OF L.G. (4.3); TELEPHONE CONFERENCE WITH L.G. AFTER DEPOSITION (0.2); FORWARD DEPOSITION EXHIBITS TO CO-COUNSEL (0.1); EXCHANGE EMAILS WITH L. FICHERA REGARDING CONSENTING TO EXTENSION REQUEST REGARDING OAL SUBPOENAS (0.1).	5.1	\$3,213.00
6/18/2021	TJO	REVIEW EMAILS FROM D. DWYER AND D. GILES.	0.1	\$63.00
6/21/2021	TJO	EXCHANGE EMAILS WITH D. GILES AND J. RUE REGARDING FAILURE TO TIMELY PROVIDE HEARING TRANSCRIPTS.	0.1	\$63.00
6/25/2021	HDR	RECEIVE AND REVIEW COURT NOTICE. TELCONF WITH TJO TO DEVELOP STRATEGY. PREPARE CORRESP. TO THE COURT REQUESTING CONF.	0.6	\$318.00
6/25/2021	TJO	REVIEW NOTICE FROM COURT REGARDING SETTING TRIAL DATE (0.1); EMAIL J. RUE REGARDING REQUESTING CONFERENCE CALL WITH CO-COUNSEL (0.1); CONFER WITH PARTNER (HDR) REGARDING DRAFTING OF LETTER TO JUDGE WILLIAMS REGARDING DISCOVERY ISSUES (0.2).	0.4	\$252.00
6/26/2021	HDR	DRAFT AND REVISE LETTER TO JUDGE WILLIAMS REQUESTING CONF. DEVELOP STRATEGY.	0.6	\$318.00
6/27/2021	HDR	RECEIVE AND REVIEW REVISED DRAFT OF LETTER TO JUDGE WILLIAMS REQUESTING CONFER. CORRESP. WITH TEAM REGARDING PROPOSE TEAM MEETING.	0.1	\$53.00
6/27/2021	HDR	RECEIVE AND REVIEW DEPOSITION NOTICE FOR D. ROTA.	0.1	\$53.00

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6/27/2021	TJO	REVISE LETTER TO JUDGE WILLIAMS REGARDING REQUESTING CONFERENCE CALL (0.7); DRAFT RULE 30(B)6 NOTICE TO OAL (1.9); DRAFT EMAIL TO CO-COUNSEL REGARDING CIRCULATING DRAFT NOTICE AND LETTER FOR REVIEW AND COMMENT (0.1); EXCHANE EMAILS WITH J. RUE REGARDING AVAILABILITY FOR CONFERENCE CALL (0.1).	2.6	\$1,638.00
6/28/2021	HDR	REVIEW CORRESPONENCE REGARDING LCR 7.1.1 STATEMENT; CORRESPOND WITH ADVERSARY REGARDING CORPORATE DESIGNEE.	0.2	\$106.00
6/28/2021	TJO	PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL (1.0); FINALIZE SUPBOENA FOR OAL 30(B)(6) DEPOSITION (0.2); DRAFT TRANSMITTAL LETTER TO OAL AND SERVE SUBPOENA (0.2); DRAFT NOTICE OF INTENT TO SERVE SUBPOENA ON OAL (0.1); DRAFT LETTER TO K. SORANNO REGARDING OAL SUBPOENA (0.1); DRAFT EMAIL TO K. SORANNO REGARDING NJDOE RULE 30(B)(6) DEPOSITION (0.1); DRAFT SUBPOENAS FOR JOHN WORTHINGTON, ELLEN BASS AND LAURA SANDERS (0.8); DRAFT NOTICES OF INTENT TO SERVE SUBOENAS ON ALL THREE WITNESSES (0.4); DRAFT LETTER TO K. SORRANO REGARDING FORWARDING NOTICES OF INTENT (0.1); DRAFT LETTER TO GUARANTEED SUBPOENA SERVICE REGARDING SERVICE OF SUBPOENA ON WORTHINGTON (0.1); DRAFT LETTER TO L. FICHERA REGARDING REQUESTING ACCEPT SERVICE OF SUBPOENAS FOR BASS AND SANDERS (0.2); FINALIZE LETTER TO JUDGE WILLIAMS REQUESTING CONFERENCE AND ELECTRONICALLY FILE LETTER (0.3).	3.6	\$2,268.00
6/29/2021	HDR	ATTEND TO RULE 7.1.1 STATEMENT. CORRESP. W/ CO COUNSEL REGARDING SAME. REVIEW CORRESPONENCE REGARDING OAL SUBPOENA.	0.3	\$159.00
6/29/2021	HDR	ATTEND TO RESEARCH REGARDING CAMDEN VICINAGE AND JUDGE HILLMAN FINAL PRETRIAL ORDER. CORRESP. WITH ADVERSARY REGARDING 30B6. DEVELOP STRATEGY REGARDING RFAS.	0.9	\$477.00
6/29/2021	TJO	REVIEW EMAIL FROM R. THURSTON REGARDING RFAS (0.1); DRAFT EMAIL TO R. THURSTON FORWARDING STATE'S PRIOR RESPONSE TO RFAS (0.1); FINALIZE AND SEND CORREPDENCE TO K. SORANNO REGARDING DEPOSITION SUBPOENAS (0.1); EMAIL L. FICHERA REGARDING BASS AND SANDERS DEPOSITIONS (0.1).	0.4	\$252.00
6/30/2021	HDR	ATTEND TO RFAS. DEVELOP STRATEGY. CORRESPOND WITH CO COUNSEL REGARDING SAME.	0.3	\$159.00
6/30/2021	HDR	REVIEW CORRESPONENCE REGARDING DISCOVERY ISSUES. DEVELOP STRATEGY REGARDING SAME.	0.4	\$212.00

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6/30/2021	TJO	REVIEW CORRESPONDENCE FROM E. HERLIHY REGARDING PLAINTIFF'S REQUEST FOR CONFERENCE WITH JUDGE WILLIAMS (0.1); DRAFT RESPONSIVE LETTER TO E. HERLIHY (2.4); TELEPHONE CONFERENCE WITH L. FICHERA REGARDING MEET AND CONFER REGARDING OAL SUBPOENA (0.2); EMAIL DRAFT OF LETTER TO HERLIHY TO CO-COUNSEL AND PROVIDE REPORT ON MEET AND CONFER WITH HERLIHY (0.5); REVIEW COMMENTS ON LETTER FROM C. REISMAN (0.1); REVISE AND FINALIZE LETTER TO HERLIHY (0.2).	3.2	\$2,016.00
6/30/2021	MH	ATTEND TO TERM SEARCHES FOR PLAINTIFFS' ESI PRODUCTIONS AND UPDATE OF STATUS MEMO.	2.1	\$493.50
7/1/2021	HDR	DEVELOP STRATEGY REGARDING MOTION TO COMPEL REGARDING OAL. REVIEW CORREPDENCE RELATING TO DEPOSITIONS OF OAL WITNESSES. PREPARE MOTION TO COMPEL REGARDING OAL SUBPOENAS.	3.7	\$1,961.00
7/1/2021	HDR	ATTEND TO PROPOSED RFAS.	0.2	\$106.00
7/1/2021	TJO	REVIEW AND REVISE REQUESTS FOR ADMISSIONS PREPARED BY R. THURSTON (3.1); DRAFT LETTER TO K. SORANNO REGARDING SERVING REQUESTS FOR ADMISSIONS (0.1).	3.2	\$2,016.00
7/1/2021	MH	ATTEND TO TERM SEARCHES FOR PLAINTIFFS' ESI PRODUCTIONS.	2.7	\$634.50
7/2/2021	HDR	ATTEND TO MOTION TO COMPEL. DEVELOP STRATEGY.	3.9	\$2,067.00
7/2/2021	TJO	REVIEW ORDER FROM COURT ENTERED ON 7/2/2021 (0.1); CONFER WITH PARTNER (HDR) REGARDING PREPARATION OF MOTION TO COMPEL AGAINST OAL (0.5); TELEPHONE CONFERENCE WITH J. RUE, D. SOUTAR, C. REISMAN AND PARTNER (HDR) REGARDING STRATEGY REGARDING DISCOVERY ISSUES (0.9); EMAIL BACKGROUND DOCUMENTATION TO PARTNER (HDR) FOR PREPARATION OF MOTION TO COMPEL AGAINST OAL (0.1).	1.7	\$1,071.00
7/6/2021	HDR	DRAFT AND REVISE MOTION TO COMPEL REGARDING OAL SUBPOENAS.	4.8	\$2,544.00

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7/6/2021	TJO	REVISE AND FINALIZE LETTER TO JUDGE WILLIAMS REGARDING OAL SUBPOENAS (0.4); ELECTRONICALLY FILE LETTER TO JUDGE WILLIAMS (0.1); EMAIL L. FICHERA REGARDING FORWARDING COPY OF LETTER (0.1); REVISE 30(B)(6) NOTICE FOR NJDOE (0.2); DRAFT LETTER TO K. SORANNO REGARDING FORWARDING NOTICE (0.1); REVIEW EMAIL FROM L. QUARTAROLO REGARDING CONTEMPORANEOUS DOCUMENTS ASSOCIATED WITH OAL WHITE PAPER PREPARED BY SANDERS (0.4); EMAIL D. DWYER REGARDING DOCUMENTS TO MARK AT SANDERS DEPOSITION (0.1); EMAIL D. GILES REGARDING DOCUMENTS FOR SUPPLEMENTAL PRODUCTION (0.1); PREPARE DEPOSITION NOTICE FOR J. WORTHINGTON (0.2); DRAFT LETTER TO K. SORANNO REGARDING FORWARDING DEPOSITION NOTICE (0.1); TELEPHONE CONFERENCE WITH J. WORTHINGTON (0.2); EMAIL R. THURSTON REGARDING CONTACT INFORMATION FOR J. WORTHINGTON (0.1); REVIEW EMAIL FROM R. THURSTON REGARDING QUESTIONING WHETHER WORTHINGTON IS IN LITIGATION CONTROL GROUP (0.1); RESEARCH LITIGATION CONTROL GROUP ISSUE (0.4); REVIEW EMAIL FROM J. RUE REGARDING SAME (0.1); EMAIL R. THURSTON REGARDING ADVISING THAT WORTHINGTON IS NOT IN THE LITIGATION CONTROL GROUP (0.2); REVIEW CORRESPONDENCE RECEIVED FROM C. KILKA (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING BASS DEPOSITION (0.2); CONTINUE PREPARING FOR ROTA DEPOSITION (0.9).	3.7	\$2,331.00
7/7/2021	HDR	REVIEW CORRESPONDENCE FROM DEFENDANTS REGARDING DISCOVERY ISSUES.	0.2	\$106.00
7/7/2021	HDR	ATTEND TO CORRESPONDENCE TO THE COURT.	0.3	\$159.00
7/7/2021	TJO	EXCHANGE MULTIPLE EMAILS WITH J. RUE REGARDING BASS DEPOSITION (0.4); EMAIL L. FICHERA REGARDING ACCEPTANCE OF SERVICE OF SUBPOENAS (0.1); REVIEW RESPONSIVE EMAIL FROM L. FICHERA REGARDING SAME (0.1); REVIEW AND REVISE LETTER PREPARED BY J. RUE REGARDING RESPONSE TO JUDGE HILLMAN'S ORDER FOR ESTIMATE OF TRIAL DATE (0.6); EXCHANGE EMAILS WITH J. RUE REGARDING ADDITION TO LETTER (0.1); DRAFT LETTER TO C. KILKA REGARDING RESPONDING TO JULY 6, 2021 LETTER REGARDING ALLEGED DISCOVERY DEFICIENCIES (0.7); PROVIDE OAL SUBPOENA RESPONSE TO PARALEGAL (MH) FOR PRODUCTION TO DAG'S OFFICE (0.2); CONTINUE PREPARING FOR ROTA DEPOSITION (0.5).	2.7	\$1,701.00
7/7/2021	MH	ATTEND TO FOLLOW-UP WITH C. PAREDES ON ACCESS TO EMAIL ADDRESSES FOR ESI.	0.2	\$47.00
7/7/2021	MH	ATTEND TO PRIOR PRODUCTIONS PER T. O'LEARY REQUEST AND OAL PRODUCTIONS IN RESPONSE TO SUBPOENAS, CREATE FTP OF THE SAME AND SERVE ON COUNSEL.	1.1	\$258.50

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7/8/2021	HDR	REVIEW CORRESPONENCE REGARDING SERVICE OF DOCUMENTS TO DEFENDANTS. ATTEND TO SERVICE OF DOCUMENTS ISSUES REGARDING SUBPOENA.	0.6	\$318.00
7/8/2021	TJO	REVIEW EMAIL FROM C. KLILKA REGARDING PLAINTIFFS' DISCOVERY RESPONSES AND RESPOND (0.1); EXCHANGE EMAILS WITH L. FICHERA REGARDING MEDICAL LEAVE (0.1); TELEPHONE CONFERENCE WITH D. DWYER REGARDING SANDERS DEPOSITION DATE (0.2); DRAFT LETTER TO JUDGE SANDERS REGARDING ISSUANCE OF SUBPOENA (0.2); DRAFT LETTER TO PROCESS SERVER REGARDING ISSUANCE OF SANDERS SUBPOENA (0.2); EXCHANGE EMAILS WITH J. RUE AND D. SOUTAR REGARDING BASS SUBPOENA (0.2); REVIEW LETTER FROM K. SORANNO TO COURT REGARDING OJBECTING TO OAL'S PARTICPATION IN CONFERENCE AND REQUESTING ADJOURNMENT OF CONFERENCE (0.1); DRAFT EMAIL TO CO-COUNSEL REGARDING PROPOSED RESPONSE TO SORANNO LETTER (0.2).	1.3	\$819.00
7/8/2021	MH	CREATE SHARE FOLDER FOR ATTORNEYS GENERAL OFFICE TO ACCESS PRODUCTION DOCUMENTS.	0.9	\$211.50
7/8/2021	NMT	ATTEND TO DRAFTS OF NOTICE OF MOTION TO ENFORCE OAL SUBPOENA, DECLARATION OF THOMAS J. O'LEARY, PROPOSED ORDER, AND CERTIFICATE OF SERVICE IN SUPPORT OF SAME.	0.8	\$188.00
7/9/2021	HDR	DRAFT AND REVISE BRIEF ISO MOTION TO COMPEL COMPLIANCE WITH OAL SUBPOENA.	1.4	\$742.00
7/9/2021	HDR	RECEIVE AND REVIEW VARIOUS CORRESPONENCE FROM THE PARTIES AND TO THE COURT.	0.3	\$159.00
7/9/2021	HDR	REVIEW CORRESPONDENCE.REGARDING 30B6 SUBPOENA TO DEFENDANTS.	0.1	\$53.00

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7/9/2021	TJO	DRAFT LETTER TO JUDGE WILLIAMS REGARDING RESPONSE TO SORANNO'S LETTER DATED 7.8.21 (0.7); REVIEW LETTER FROM C. KILKA REGARDING ALLEGED DISCOVERY RESPONSES (0.1); EMAIL K. SORANNO REGARDING REQUESTING CALL TO DISCUSS KILKA'S LETTER (0.1); LISTEN TO VOICEMAIL FROM C. WEBER (0.1); TELEPHONE CONFERENCE WITH C. WEBER REGARDING OAL SUBPOENAS (0.4); REVIEW EMAIL FROM C. WEBER REGARDING MEMORIALIZING CONVERSATION (0.1); EMAIL D. SOUTAR REGARDING REQUESTING COPY OF BASS SUBPOENA TO SEND TO WEBER (0.1); TELEPHONE CONFERENCE WITH K. SORANNO REGARDING DISCOVERY ISSUES AND SCHEDULE (0.4); REVIEW EMAIL FROM K. SORANNO REGARDING REQUESTING CONSENT TO AGREE TO DISCOVERY EXTENSION (0.1); ZOOM CONFERENCE WITH D. SOUTAR, J. RUE, AND H. RUIZ REGARDING TELEPHONE CONFERENCE WITH K. SORANNO (0.3); DRAFT RESPONSIVE EMAIL TO K. SORANNO REGARDING REQUEST FOR DISCOVERY EXTENSTION (0.1); DRAFT RESPONSIVE EMAIL TO C. WEBER REGARDING PROVIDING SUMMARY OF STATUS OF OAL SUBPOENA ISSUES (0.5); REVIEW CORRESPONDENCE FILED BY SORANNO WITH COURT (0.1); CONTINUE PREPARING FOR ROTA DEPOSITION (1.0).	4.1	\$2,583.00
7/9/2021	MH	CONDUCT TERM SEARCHES FOR PLAINTIFFS' ESI PRODUCTION AND ATTEND TO CONVERSION TO .PST.	5.8	\$1,363.00
7/12/2021	HDR	ATTEND TO MOTION TO COMPEL REGARDING OAL SUBPOENA.	1.0	\$530.00
7/12/2021	HDR	CORRESPOND WITH TEAM REGARDING STRATEGY REGARDING SUBPOENAS.	0.1	\$53.00
7/12/2021	TJO	REVIEW CORRESPONDENCE FROM E. HERLIHY REGARDING WORTHINGTON DEPOSITION AND REVIEW EMAIL FROM R. THURSTON TO E. HERLIHY REGARDING WORTHINGTON DEPOSITION (0.1); PREPARE AGENDA FOR CONFERENCE CALL (0.2); EXCHANGE EMAILS WITH J. RUE REGARDING SCHEDULING OF CONFERENCE CALL (0.1).	0.4	\$252.00
7/12/2021	MH	CONDUCT TERM SEARCHES FOR PLAINTIFFS' ESI PRODUCTION AND ATTEND TO CONVERSION TO .PST, DRAFT SUMMARY OF FINDINGS AND CREATE FTP FOR RUE FIRM REVIEW.	1.5	\$352.50
7/13/2021	HDR	TELCONF WITH CO COUNSEL TO DEVELOP STRATEGY REGARDING TRIAL AND DISCOVERY ISSUE. COLLECT SAMPLE PRETRIAL ORDERS AND TRIAL BRIEFS.	1.5	\$795.00
7/13/2021	HDR	REVIEW COURT NOTICE REGARDING STATUS CONF. W/ COURT. REVIEW CORRESPONENCE REGARDING WORTHINGTON SUBPOENA.	0.2	\$106.00
7/13/2021	HDR	DEVELOP STRATEGY. CORRESP. WITH CO COUNSEL.	0.2	\$106.00
7/13/2021	MH	ATTEND TO RESEARCH REGARDING JUDGE HILLMAN PROPOSED FINAL PRETRIAL ORDERS AND PREFERENCES.	1.4	\$329.00

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7/13/2021	MH	ATTEND TO CALL WITH RUE TEAM ON STATUS OF DISCOVERY AND UPDATE MEMO REGARDING THE SAME.	0.9	\$211.50
7/13/2021	NMT	ATTEND TO REVIEW AND ORGANIZATION OF EXHIBITS TO TJO DECLARATION IN SUPPORT OF MOTION TO ENFORCE OAL SUBPOENA.	0.7	\$164.50
7/14/2021	HDR	ATTEND TO MOTION TO ENFORCE OAL SUBPOENAS.	1.7	\$901.00
7/14/2021	HDR	CORRESP. WITH TEAM REGARDING PRETRIAL MATTERS.DEVELOP STRATEGY.	0.3	\$159.00
7/14/2021	HDR	ATTEND TO MOTION TO COMPEL REGARDING OAL SUBPOENAS.	0.4	\$212.00
7/14/2021	HDR	REVIEW CORRES. FROM CO COUNSEL REGARDING STRATEGY REGARDING TO FEDERAL FUNDING ISSUES.	0.1	\$53.00
7/14/2021	TJO	PREPARE MM FOR DEPOSITION (1.0); REVIEW AND EDIT MOTION PAPERS TO ENFORCE SUBPOENAS AGAINST OAL (2.3).	3.3	\$2,079.00
7/14/2021	MH	CONDUCT TERM SEARCHES FOR PLAINTIFFS' ESI PRODUCTION, ATTEND TO CONVERSION TO .PST, DRAFT SUMMARY OF FINDINGS AND LOGISTICS FOR UPCOMING PRODUCTIONS.	3.7	\$869.50
7/15/2021	HDR	REVIEW CORRESPONDENCE REGARDING MILLIGAN DEPOSITION.	0.1	\$53.00
7/15/2021	TJO	DEFEND MM IN DEPOSITON (7.3); EMAIL MM DEPOSITION EXHIBITS TO CO-COUNSEL (0.2); UPLOAD MM DEPOSITION EXHIBITS TO NETWORK (0.1).	7.6	\$4,788.00
7/15/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION AND COORDINATION WITH RUE FIRM REGARDING THE SAME.	2.3	\$540.50
7/16/2021	HDR	REVIEW CORRESPONDENCE REGARDING MOTION TO COMPEL REGARDING OAL, AND COURT CONF. ON 7.22.21.	0.2	\$106.00
7/16/2021	HDR	REVIEW CORRESPONDENCE REGARDING SUPPL. DOCUMENT PRODUCTION. ATTEND TO MOTION TO COMPEL REGARDING OAL SUBPOENAS. CORRESP REGARDING WORTHINGTON DEPOSITION.	1.3	\$689.00
7/16/2021	HDR	ATTEND TO ISSUES SURROUNDING SERVICE OF SUBPOENA ON SANDERS.	0.3	\$159.00

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7/16/2021	TJO	TELEPHONE CONFERENCE WITH C. WEBER REGARDING OAL SUBPOENAS AND DEPOSITIONS (0.2); REVIEW EMAIL FROM R. THURSTON REGARDING COMMENTS ON MOTION TO ENFORCE SUBPOENAS AGAINST OAL (0.1); EMAIL PARTNER (HDR) REGARDING REQUESTING CHANGES TO BRIEF BASED ON THURSTON COMMENTS (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING DEPOSITIONS AND CONFERENCE CALL WITH JUDGE WILLIAMS (0.3); EMAIL C. HENDRICKS, C. WEBER AND L. FICHERA REGARDING RE-SERVE 30(B)(6) AND BASS SUBPOENAS (0.1); CONFER WITH PARALEGAL (MH) REGARDING SUPPLEMENTAL DOCUMENT PRODUCTION (0.2); FORWARD CORRESPONDENCE TO J. RUE SO HE CAN PREPARE FOR CONFERENCE WITH JUDGE WILLIAMS WHILE I'M ON VACATION (0.4); CONTINUE PREPARING FOR ROTA DEPOSITION (1.7); REVIEW EMAIL FROM J. RUE REGARDING WHETHER HE SHOULD SUBMIT ANOTHER LETTER TO JUDGE WILLIAMS IN ADVANCE OF CONFERENCE AND DRAFT RESPONSIVE EMAIL REGARDING ADVISING NOT TO SUBMIT LETTER (0.1).	3.2	\$2,016.00
7/16/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION, COORDINATION WITH RUE FIRM, CREATE FTP OF SUPPLEMENTAL PRODUCTIONS AND SERVE ON ALL COUNSEL.	6.3	\$1,480.50
7/16/2021	NMT	ATTEND TO REVISIONS TO NOTICE OF MOTION, BRIEF, AND CERTIFICATE OF SERVICE IN SUPPORT OF MOTION TO COMPEL OAL SUBPOENA.	0.4	\$94.00
7/18/2021	HDR	ATTEND TO MOTION TO COMPEL REGARDING OAL SUBPOENAS.	0.3	\$159.00
7/19/2021	HDR	ATTEND TO MOTION TO COMPEL REGARDING OAL.	0.3	\$159.00
7/19/2021	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL R. THURSTON ESQ. REGARDING COURT CONF. ATTEND TO MOTION TO COMPEL REGARDING OAL SUBPOENAS.	1.8	\$954.00
7/19/2021	HDR	CORRESP. WITH CO COUNSEL REGARDING JUDGE BASS DEPOSITION.	0.1	\$53.00
7/19/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION AND COORDINATION WITH RUE FIRM REGARDING THE SAME.	2.2	\$517.00
7/20/2021	HDR	Communicate (in firm) ATTEND TO SERVICE OF SANDERS SUBPOENA.	0.1	\$53.00
7/20/2021	HDR	CORRESP WITH ADVERSARY REGARDING WORTHINGTON DEPOSITION.	0.1	\$53.00
7/20/2021	TJO	TELEPHONE CONFERENCE WITH C. REISMAN, J. RUE AND H. RUIZ REGARDING STRATEGY FOR CONFERENCE WITH COURT (1.0); REVIEW ORDER REGARDING RESCHEDULING CONFERENCE (0.1); CONTINUE PREPARING FOR ROTA DEPOSITION (4.1).	5.2	\$3,276.00

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7/20/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION AND COORDINATION WITH RUE FIRM REGARDING THE SAME.	3.9	\$916.50
7/21/2021	HDR	TELECONFERENCE. WITH CO COUNSEL TO DEVELOP STRATEGY REGARDING DISCOVERY AND PRETRIAL ISSUES. ATTEND TO CORRESP. TO ADVERSARY REGARDING DISCOVERY ISSUES. DEVELOP STRATEGY REGARDING MOTION TO COMPEL REGARDING OAL. ATTEND TO ISSUES REGARDING SERVICE ON SANDERS.	1.4	\$742.00
7/21/2021	HDR	ATTEND TO MOTION TO COMPEL REGARDING OAL SUBPOENAS. ATTEND TO ISSUES REGARDING SERVICE OF SUBPOENAS ON SANDERS. TEAM CALL TO DEVELOP STRATEGY REGARDING DISCOVERY ISSUES.	3.0	\$1,590.00
7/21/2021	HDR	ATTEND TO SERVICE ISSUES REGARDING SANDERS DEPOSITION.	0.3	\$159.00
7/21/2021	HDR	PREP FOR TELEPHONIC CONF. W/ COURT. CONFER WITH CO COUNSEL REGARDING TELEPHONIC CONF. W/ COURT. PARTICIPATE IN TELEPHONIC CONF. W/ COURT.	1.8	\$954.00
7/21/2021	TJO	ATTEND ZOOM CONFERENCE WITH CO-COUNSEL REGARDING STRATEGY IN LIGHT OF CONFERENCE CALL WITH JUDGE WILLIAMS (1.2); EMAIL L. FICHERA REGARDING SCHEDULING OF OAL DEPOSITIONS (0.1); REVIEW AND COMMENT ON RUE LETTER TO K. SORANNO (0.1); SECOND ZOOM CONFERENCE WITH J. RUE REGARDING STRATEGY REGARDING MEET AND CONFER WITH SORANNO (0.6); PERFORM PRELIMINARY RESEARCH REGARDING EVIDENTIARY ISSUES REGARDING OAL WHITEPAPER AUTHORED BY SANDERS AND EMAIL PARTNER (HDR) REGARDING NEED FOR FURTHER RESEARCH (0.3).	2.2	\$1,386.00
7/21/2021	MH	REVISE AND ELECTRONICALLY FILE MOTION TO COMPEL OAL/SUPPORTING PAPERS.	2.3	\$540.50
7/21/2021	MH	PLAINTIFFS' COUNSEL TEAM CALL ON FOLLOW-UP FROM HEARING AND STRATEGY.	0.8	\$188.00
7/21/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION, COORDINATION WITH RUE FIRM REGARDING THE SAME AND DRAFT STATUS UPDATE ON OUTSTANDING PRODUCTIONS.	1.9	\$446.50
7/21/2021	NMT	ATTEND TO DRAFT OF BRIEF IN SUPPORT OF MOTION TO COMPEL OAL SUBPOENA.	0.8	\$188.00
7/22/2021	HDR	MEET AND CONFER WITH DEFS REGARDING DISCOVERY. ATTEND TO DISCOVERY ISSUES.	0.6	\$318.00
7/22/2021	HDR	ATTEND TO PROPOSED CORRESP. REGARDING DISCOVERY ISSUES. ATTEND TO ISSUES SURROUNDING WHITE PAPER.	0.4	\$212.00
7/22/2021	HDR	PREP AND PARTICIPATE IN MEET & CONFER.	0.8	\$424.00

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7/22/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION AND COORDINATION WITH RUE FIRM REGARDING THE SAME.	1.3	\$305.50
7/23/2021	HDR	REVIEW CORRESPONDENCE FROM PARTIES REGARDING DISCOVERY ISSUES. DEVELOP STRATEGY REGARDING DISCOVERY ISSUES.	0.4	\$212.00
7/23/2021	HDR	RECEIVE/REVIEW ORDER REGARDING FINAL PRETRIAL ORDER AND CONF.	0.1	\$53.00
7/23/2021	HDR	DEVELOP STRATEGY REGARDING DISCOVERY ISSUES. CONF WITH CO COUNSEL REGARDING SAME.	0.7	\$371.00
7/23/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION, COORDINATION WITH RUE FIRM REGARDING THE SAME AND CREATE FTP OF PLAINTIFF'S SUPPLEMENTAL PRODUCTION; CREATE FTP OF DISCOVERY/DEPOS ELECTRONIC FILES AND FORWARD TO PLAINTIFFS' TEAM.	5.3	\$1,245.50
7/24/2021	HDR	CORRESP. WITH CO COUNSEL REGARDING PROPOSED STRATEGY CALL ON 7.25.21.	0.1	\$53.00
7/25/2021	HDR	CORRESP. WITH CO COUNSEL TO DEVELOP STRATEGY REGARDING DISCOVERY.	0.3	\$159.00
7/25/2021	HDR	RECEIVE AND REVIEW PLAINTIFFS LTR FILED WITH COURT REGARDING DISCOVERY ISSUES.	0.1	\$53.00
7/25/2021	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING LITIGATION STRATEGY AND LETTER TO COURT.	1.0	\$630.00
7/26/2021	HDR	DEVELOP STRATEGY REGARDING DISCOVERY ISSUES. REVIEW ORDER OF COURTS REGARDING 7.26 TELCONF.	0.4	\$212.00
7/26/2021	HDR	REVIEW CORRESPONDENCE REGARDING WHITE PAPER. CALL WITH TJO REGARDING STRATEGY.	0.6	\$318.00
7/26/2021	TJO	TELEPHONE CONFERENCE WITH D. DWYER REGARDING PREPARATION FOR SANDERS DEPOSITION (0.6); REVIEW FILE AND FORWARD RELEVANT DOCUMENTS TO ASSOC. (GB) TO DRAFT MOTION TO COMPEL DISCOVERY (1.3); REVIEW LETTER FROM J RUE FILED WITH COURT (0.1); REVIEW LETTER FROM K. SORANNO FILED WITH COURT (0.1); TELEPHONE CONFERENCE WITH J. RUE, D. SOUTAR AND PARTNER (HDR) REGARDING PREPARATION FOR CALL WITH JUDGE WILLIAMS (0.5); TELEPHONE CONFERENCE WITH COUNSEL AND JUDGE WILLIAMS (0.6); ZOOM CONFERENCE WITH CO-COUNSEL AFTER CALL WITH JUDGE WILLIAMS (0.5); EMAIL K. SORANNO REGARDING SCHEDULING MEET AND CONFER REGARDING DEPOSITION SCHEDULE (0.1); EMAIL L. FICHERA REGARDING DISCOVERY EXTENSION (0.1); CONTINUE PREPARING FOR ROTA DEPOSITION (3.7).	7.6	\$4,788.00
7/26/2021	GWB	BEGIN TO DRAFT MOTION TO COMPEL SAMPLE CASE FILES.	4.0	\$1,780.00
7/26/2021	CIA	RESEARCHING AND DRAFTING MEMO ON HEARSAY EXCEPTION FOR WHITE PAPER.	4.0	\$1,160.00

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Date	Person	Description of Services	Hours	Amount
7/27/2021	HDR	CORRESPOND WITH DEFS REGARDING LATEST DOCUMENT PRODUCTION.	0.1	\$53.00
7/27/2021	HDR	REVIEW AMENDED SCHEDULING ORDER; REVIEW CORRESPONDENCE REGARDING DEPO SCHEDULE; REVIEW MINUTES OF 7.26.21 CALL WITH COURT.	0.3	\$159.00
7/27/2021	TJO	TELEPHONE CONFERENCE WITH D. DWYER REGARDING PREPARATION FOR SANDERS DEPOSITION (0.6); REVIEW EMAIL FROM J. RUE REGARDING AVAILABILITY OF HIS CLIENTS FOR DEPOSITION (0.2); PREPARE FOR CALL WITH K. SORANNO (0.4); TELEPHONE CONFERENCE WITH K. SORANNO REGARDING SCHEDULING OF DEPOSITIONS (0.8); DRAFT EMAIL TO K. SORANNO REGARDING MEMORIALIZING DEPOSITION SCHEDULE (0.3); TELEPHONE CONFERENCE WITH E.M. REGARDING AVAILABILITY FOR DEPOSITION AND PREPARATION (0.2); EMAIL E.M. ZOOM LINK (0.1); EMAIL C. REISMAN REGARDING EP DEPOSITION AND PREPARATION SESSION (0.1); EMAIL K. SORANNO REGARDING PRODUCTION OF DOCUMENTS LIKELY TO BE USED IN SANDERS DEPOSITION (0.2); CONTINUE PREPARING FOR ROTA DEPOSITION (1.1).	3.9	\$2,457.00
7/27/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION, COORDINATION WITH RUE FIRM REGARDING THE SAME AND ATTEND TO EMAILS WITH COUNSEL AND OAL PRODUCTION IN ADVANCE OF SANDERS DEPOSITION.	2.6	\$611.00
7/27/2021	CIA	RESEARCHING AND DRAFTING MEMO ON HEARSAY EXCEPTION FOR WHITE PAPER.	4.9	\$1,421.00
7/28/2021	HDR	CORRESP WITH CO COUNSEL REGARDING LCR 7.1.1 STATEMENT.	0.1	\$53.00
7/28/2021	HDR	CORRESP WITH CO COUNSEL REGARDING DEPOSITIONS.	0.1	\$53.00
7/28/2021	HDR	ATTEND TO DRAFT CONSENT ORDER REGARDING SAMPLE CASE FILES. RECEIVE DEFS DEPO NOTICES. CORRESP. WITH DEFS REGARDING RFA RESPONSES.	2.2	\$1,166.00
7/28/2021	TJO	ATTEND SANDERS DEPOSITION IN PREPARATION OF TAKING 30(B)(6) DEPOSITION OF OAL.	6.5	\$4,095.00
7/28/2021	TJO	UPLOAD DEPOSITION EXHIBITS TO NETWORK AND SHARE SAME WITH CO-COUNSEL (0.2); EXCHANGE EMAILS WITH J. RUE REGARDING SCHEDULING CONFERENCE CALL REGARDING DEFENSE OF UPCOMING DEPOSITIONS (0.1); EMAIL L. FICHERA REGARDING SCHEDULING OF OAL 30(B)(6) DEPOSITION (0.1).	0.4	\$252.00
7/28/2021	MH	ATTEND TO DOCUMENTS FOR PRODUCTION, COORDINATION WITH RUE FIRM REGARDING THE SAME.	2.1	\$493.50

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7/29/2021	HDR	ATTEND TO 7.1.1 DISCLOSURE ISSUES. ATTEND TO CORRESP. TO THE COURT REGARDING DEFS 7.29 LETTER TO COURT. ATTEND TO CONSENT ORDER REGARDING SAMPLE CASE FILE. REVIEW CORRESPONDENCE REGARDING SANDERS DEPOSITION. REVIEW SUMMARY OF SANDERS 7.27 DEPOSITION.	2.0	\$1,060.00
7/29/2021	TJO	TELEPHONE CONFERENCE WITH D. SOUTAR AND J. RUE REGARDING DEFENSE OF DEPOSITIONS (0.7); REVIEW LETTER FROM K. SORANNO TO COURT (0.1); REVIEW AND REVISE DRAFT LETTER BY J. RUE IN RESPONSE (0.6).	1.4	\$882.00
7/30/2021	HDR	ATTEND TO DRAFT CONSENT ORDER REGARDING SAMPLE CASE FILES. RECEIVE DEP NOTICES DIRECTED TO PLTNTIFFS. CORRESP. WITH DEFS REGARDING DOCUMENT PRODUCTION.	0.5	\$265.00
7/30/2021	HDR	ATTEND TO PROPOSED CORRESP. TO DEFS.	0.1	\$53.00
7/30/2021	TJO	DRAFT EMAIL TO L. FICHERA REGARDING SCHEDULING OF OAL 30(B)(6) DEPOSITION (0.1); REVIEW RESPONSIVE EMAIL FROM L. FICHERA (0.1); EXCHANGE MULTIPLE EMAILS WITH K. SORANNO AND CO-COUNSEL REGARDING AMENDMENT TO DEPOSITION SCHEDULE (0.8); CONTINUE PREPARING FOR ROTA DEPOSITION (3.4).	4.4	\$2,772.00
7/30/2021	MH	ATTEND TO PLAINTIFFS' SUPPLEMENTAL PRODUCTIONS AND CREATE FTP OF THE SAME FOR SERVICE ON ALL COUNSEL.	0.8	\$188.00
8/1/2021	TJO	PREPARE FOR PREPARATION SESSION WITH E.M. FOR HER DEPOSITION.	2.1	\$1,323.00
8/2/2021	HDR	REVIEW CORRESPONDENCE REGARDING DEPO SCHEDULE. REVIEW CORRESPONDENCE TO COURT REGARDING CONSENT ORDER FOR SAMPLE CASE FILES.	0.2	\$106.00
8/2/2021	TJO	PREPARE E.M. FOR DEPOSITION (2.6); CONTINUE PREPARING FOR ROTA DEPOSITION (0.7).	3.3	\$2,079.00
8/2/2021	GWB	REVIEW AND REVISE COVER LETTER AND CONSENT ORDER REGARDING SAMPLE CASE FILES TO JUDGE WILLIAMS.	0.4	\$178.00
8/2/2021	MH	ATTEND TO TERM SEARCHES IN STRUNK'S PRODUCTION PER J. RUE REQUEST AND CREATE FTP OF RESULTS FOR REVIEW.	0.8	\$188.00
8/2/2021	NMT	ATTEND TO FINAL DRAFT OF LETTER TO THE COURT ENCLOSING CONSENT ORDER; PREPARE, FINALIZE, AND FILE CONSENT ORDER SUBMISSION.	0.2	\$47.00
8/3/2021	TJO	DEFEND E.M. IN DEPOSITION (5.5); CONTINUING TO PREPARE FOR ROTA DEPOSITION (0.6); REVIEW EMAIL FROM D. SOUTAR AND RESPOND EP DEPOSITION (0.1).	6.2	\$3,906.00

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Date	Person	Description of Services	Hours	Amount
8/3/2021	MH	REVIEW AND COMPILE DISCOVERY RESPONSES/PRODUCTION DOCUMENTS PER J. RUE REQUEST.	0.7	\$164.50
8/4/2021	HDR	REVIEW FILING BY DEFS REGARDING THIRD PART LIT. FUNDING. CORRESP. REGARDING CM DEP EXHIBITS.	0.2	\$106.00
8/4/2021	HDR	REVIEW NOTICE REGARDING THIRD PARTY FINDING DISCL. BY DEFENDANTS.	0.1	\$53.00
8/4/2021	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING STRATEGY REGARDING PRETRIAL ORDER. CORRESP WITH DEFS REGARDING SUPPL. DISCOVERY.	0.2	\$106.00
8/4/2021	TJO	CONTINUE PREPARING FOR ROTA DEPOSITION.	7.7	\$4,851.00
8/4/2021	MH	REVIEW/COMPILE PRODUCTION DOCUMENTS FOR PLAINTIFFS' DEPOSITION PREPARATION AND ATTEND TO TEAM EMAILS REGARDING THE SAME.	2.6	\$611.00
8/5/2021	HDR	REVIEW CORRES. REGARDING SUPPL. PRODUCTION TO DEFS. REVIEW CORRESPONDENCE REGARDING 8.6.21 DEPOSITION.	0.2	\$106.00
8/5/2021	HDR	REVIEW CORRESPONDENCE REGARDING ROTA DEPOSITION. REVIEW CORRESPONDENCE REGARDING EP DEPOSITION UPDATE. REVIEW CORRESPONDENCE REGARDING DEFS. SUPPL. PRODUCTION.	0.4	\$212.00
8/5/2021	TJO	CONTINUE PREPARING FOR ROTA DEPOSITION.	9.7	\$6,111.00
8/5/2021	MH	ATTEND TO PLAINTIFFS' SUPPLEMENTAL PRODUCTION AND SERVE THE SAME ON ALL COUNSEL.	0.7	\$164.50
8/5/2021	MH	REVIEW/COMPILE DOCUMENTS FOR PLAINTIFFS' DEPOSITION PREPARATION.	0.6	\$141.00
8/6/2021	HDR	REVIEW CORRESPONDENCE REGARDING DEPOSITION EXHIBITS. REVIEW CORRESPONDENCE REGARDING DO DEPOSITION. REVIEW CORRESPONDENCE REGARDING PROPOSED SETTLEMENT TALKS.	0.3	\$159.00
8/6/2021	TJO	DEPOSE D. ROTA.	8.2	\$5,166.00
8/6/2021	DDC	ATTEND DEPOSITION OF DOMINIC ROTA TO ASSIST TJO WITH EXHIBITS AND RECEIVE FOLLOW UP QUESTIONS FROM CO-COUNSEL.	6.5	\$2,925.00
8/6/2021	MH	ATTEND TO PLAINTIFFS' SUPPLEMENTAL PRODUCTIONS AND COORDINATION WITH RUE FIRM REGARDING THE SAME.	2.1	\$493.50
8/9/2021	HDR	ATTEND TO SUBPOENAS TO C HENDRICKS C MARANO, NOTICE OF SUBPOENAS AND RELATED CORRESP.	1.0	\$530.00
8/9/2021	HDR	ATTEND TO MOTION PAPERS REGARDING MOTION TO ENFORCE OAL SUBPOENAS.	0.1	\$53.00
8/9/2021	HDR	ATTEND TO PLAINTIFFS SUPPL. PRODUCTION.	0.2	\$106.00

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8/9/2021	TJO	PREPARE FOR NJDOE 30(B)(6) DEPOSITION.	7.5	\$4,725.00
8/9/2021	MH	ATTEND TO PLAINTIFFS' SUPPLEMENTAL PRODUCTION AND SERVE THE SAME ON ALL COUNSEL.	1.2	\$282.00
8/10/2021	HDR	CORRESP W/ CO COUNSEL POST DEFS RULE 30(B)(6) DEPOSITION. ATTEND TO THIRD PARTIES SUBPOENAS. ATTEND TO CORRESP. TO COURT REGARDING DISCOVERY ISSUES AND POTENTIAL MIL. REVIEW CORRESPONDENCE REGARDING SUPPL. DOCUMENT PRODUCTION. REVIEW AND ANALYZE OAL OPPOSITION TO MOTION TO ENFORCE SUBPOENAS.	2.7	\$1,431.00
8/10/2021	TJO	CONTINUE PREPARING FOR 30(B)(6) DEPOSITION (0.7); CONDUCT 30(B)(6) DEPOSITION OF NJDOE (7.0); TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING DEPOSITION (0.9); UPLOAD EXHIBITS FOR THREE DEPOSITION TO FIRM'S NETWORK (0.4).	9.0	\$5,670.00
8/10/2021	DDC	REVIEW THE OAL'S OPPOSITION TO THE MOTION TO COMPEL AND SUPPORTING CASE LAW CITED THEREIN.	2.4	\$1,080.00
8/10/2021	DDC	CASE LAW RESEARCH IN SUPPORT OF REPLY BRIEF.	3.2	\$1,440.00
8/10/2021	DDC	BEGIN DRAFTING REPLY BRIEF IN SUPPORT OF MOTION TO ENFORCE OAL SUBPOENAS.	2.0	\$900.00
8/10/2021	GWB	ATTEND 30(b)(6) (EHLING) DEPOSITION AND ASSIST TJO WITH EXHIBITS AND RECEIVE FOLLOWUP QUESTIONS FROM CO-COUNSEL.	7.0	\$3,115.00
8/10/2021	MH	ATTEND TO NJDOE SUPPLEMENTAL PRODUCTION.	0.1	\$23.50
8/10/2021	MH	ATTEND TO PLAINTIFFS' SUPPLEMENTAL PRODUCTION.	0.5	\$117.50
8/10/2021	MH	REVIEW OF DNJ CORRESPONDENCE TO MAGISTRATES REQUESTING DEPOSITIONS AFTER DISCOVERY END DATE PER H, RUIZ REQUEST AND ATTEND TO EMAILS WITH H. RUIZ REGARDING THE SAME.	0.4	\$94.00
8/10/2021	NMT	ATTEND TO DRAFTS OF LETTERS TO HENDRICKS AND MARANO ENCLOSING SUBPOENAS.	0.3	\$70.50
8/11/2021	HDR	REVIEW AND ANALYZE SANDERS DEPO TRANSCRIPT. ATTEND TO PROPOSED LETTER TO THE COURT REGARDING DISCOVERY DISPUTE. DEVELOP STRATEGY REGARDING LETTER TO THE COURT.	1.2	\$636.00
8/11/2021	HDR	ATTEND TO SUBPOENAS TO HENDRICKS AND MARANO.	1.0	\$530.00
8/11/2021	HDR	REVIEW CORRESPONDENCE REGARDING C. HENDRICKS SUBPOENA.	0.1	\$53.00
8/11/2021	TJO	PREPARE FOR 30(B)(6) DEPOSITION OF OAL.	3.7	\$2,331.00
8/11/2021	DDC	CONTINUE DRAFTING REPLY BRIEF IN SUPPORT OF MOTION TO ENFORCE OAL SUBPOENAS.	2.5	\$1,125.00

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8/11/2021	DDC	ADDITIONAL CASE LAW RESEARCH IN SUPPORT OF REPLY BRIEF IN SUPPORT OF MOTION TO ENFORCE OAL SUBPOENAS.	1.7	\$765.00
8/11/2021	GWB	DRAFT LETTER TO DEFENDANT'S COUNSEL REGARDING DOCUMENTS REQUESTED AT DEPOSITION.	0.8	\$356.00
8/11/2021	NMT	ATTEND TO DRAFTS OF LETTERS TO DAGS ENCLOSING NOTICES OF INTENT TO SUBPOENA HENDRICKS AND MARANO.	0.3	\$70.50
8/12/2021	HDR	ATTEND TO REPLY ISO MOTION TO COMPEL OAL. RECEIVE CORRESP. REGARDING PLTFFS SUPPL PRODUCTION. ATTEND TO SUBPOENA REGARDING C. MARANO. ATTEND TO HENDRICK S SUBPOENA.	2.3	\$1,219.00
8/12/2021	TJO	CONTINUE PREPARING FOR OAL 30(B)(6) DEPOSITION.	7.5	\$4,725.00
8/12/2021	DDC	FINISH DRAFTING REPLY BRIEF IN SUPPORT OF MOTION TO ENFORCE OAL SUBPOENAS.	3.9	\$1,755.00
8/12/2021	MH	ATTEND TO PLAINTIFFS' SUPPLEMENTAL PRODUCTION, CREATE FTP, ATTEND TO CALL WITH TEAM AND EMAILS REGARDING DISCOVERY DEPOSITORY AND TRACKING OF THE SAME.	1.4	\$329.00
8/12/2021	NMT	ATTEND TO COMMUNICATION WITH GUARANTEED SUBPOENA TO RUN SKIP TRACE ON MARANO.	0.3	\$70.50
8/13/2021	HDR	ATTEND TO REPLY REGARDING MOTION TO ENFORCE OAL SUBPOENAS.	1.5	\$795.00
8/13/2021	HDR	REVIEW CORRESPONDENCE FROM J. RUE REGARDING ADDITIONAL SUBPOENA.	0.1	\$53.00
8/13/2021	HDR	ATTEND TO SERVICE OF MARANO SUBPOENA.	0.1	\$53.00
8/13/2021	HDR	ATTEND TO SERVICE OF SUBPOENA ISSUES REGARDING C. MARANO.	0.2	\$106.00
8/13/2021	TJO	CONDUCT RULE 30(B)(6) DEPOSITION OF OAL (2.5); CONFER WITH J. RUE AND D. DWYER REGARDING DEFPOSITION (0.7); DRAFT SUBPOENA FOR OAL REGARDING EMAILS SENT TO ROTA (0.4); DRAFT EMAIL TO OAL REGARDING SERVING SUBPOENA (0.1); DRAFT NOTICE OF INTENT TO ISSUE SUBPOENA (0.1); DRAFT LETTER TO K. SORANNO REGARDING SERVING NOTICE OF INTENT (0.1); REVISE LETTER TO K. SORANNO REGARDING REQUESTING DOCUMENTS FROM NJDOE 30(B)(6) DEPOSITION (0.3); REVIEW AND COMMENT ON REPLY BRIEF REGARDING MOTION TO ENFORCE SUBPOENAS AGAINST OAL (0.9).	5.1	\$3,213.00
8/13/2021	MH	ATTEND TO REPLY IN SUPPORT OF MOTION TO ENFORCE OAL SUBPOENAS AND ELECTRONICALLY FILE THE SAME.	0.4	\$94.00
8/13/2021	NMT	ATTEND TO DRAFT OF REPLY BRIEF IN FURTHER SUPPORT OF MOTION TO ENFORCE OAL SUBPOENA.	0.6	\$141.00

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8/16/2021	HDR	REVIEW CORRESPONDENCE TO DEFS. REGARDING DOCS FROM ERHLING DEPOSITION. REVIEW CORRESPONDENCE REGARDING DOCS REGARDING ROTA DEPOSITION. REVIEW CORRESPONDENCE REGARDING AMENDMENT OF INTERROG ANSWER.	0.3	\$159.00
8/16/2021	HDR	ATTEND TO SERVICE TO DEPOS. SUBPOENA ON C. MARANO.	0.2	\$106.00
8/16/2021	TJO	REVIEW TRANSCRIPT OF ROTA DEPOSITION AND DRAFT LETTER TO K. SORANNO REGARDING DOCUMENTS REQUESTED DURING ROTA DEPOSITION.	1.2	\$756.00
8/17/2021	HDR	ATTEND TO PTO EXHIBIT LIST.	0.5	\$265.00
8/17/2021	HDR	ATTEND TO SERVICE OF C MARANO SUBPOENA.	0.1	\$53.00
8/18/2021	HDR	REVIEW CORRESPONDENCE REGARDING MARANO DEPO. ATTEND TO CORRESP. TO THE COURT REGARDING DISCOVERY DISPUTES. CORRESP. WITH CO COUNSEL REGARDING MTG REGARDING PROPOSED FINAL PRETRIAL ORDER.	0.5	\$265.00
8/19/2021	HDR	REVIEW CORRESP REGARDING C. MARANO DEPOSITION. REVIEW CORRESP. REGARDING SUBPOENAS SERVED BY DEFS. DEVELOP STRATEGY.	0.4	\$212.00
8/19/2021	MH	REVIEW OF SUBPOENAS TO SCHOOL BOARDS AND ATTEND TO EMAILS WITH TEAM REGARDING DEFICIENCIES WITH THE SAME.	0.7	\$164.50
8/20/2021	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING BASS DEPOSITION.	0.2	\$106.00
8/20/2021	HDR	RECEIVE AND REVIEW AMENDED TRIAL NOTICE.	0.1	\$53.00
8/20/2021	MH	ATTEND TO DEPOSITION TRANSCRIPTS/EXHIBITS, PRODUCTIONS, AND DISCOVERY, COORDINATE WITH PLAINTIFFS' TEAM, CREATE FTP OF THE SAME AND UPDATE DISCOVERY STATUS MEMO.	3.5	\$822.50
8/20/2021	MH	ATTEND TO AMENDED SCHEDULING ORDER.	0.1	\$23.50
8/23/2021	HDR	REVIEW CORRESPONDENCE REGARDING MOSKOWITZ DEPOSITION.	0.1	\$53.00
8/23/2021	TJO	ZOOM CONFERENCE WITH J. RUE, D. SOUTAR AND C. REISMAN REGARDING TRIAL PREPARATION, IDENTIFICATION OF WITNESSES TO TESTIFY AT TRIAL AND REMAINING DISCOVERY (0.8); UPLOAD DEPOSITION EXHIBITS FROM CP DEPOSITION TO NETWORK (0.1); REVIEW EMAILS FROM COURT REPORTER AND R. THURSTON REGARDING WORTHINGTON TRANSCRIPT INVOICE AND RESPOND (0.1); DRAFT EMAIL TO CO-COUNSEL REGARDING FORWARDING WORTHINGTON TRANSCRIPT (0.1); REVIEW SUBPOENAS SERVED ON SCHOOL DISTRICTS (0.1); TELEPHONE CONFERENCE WITH E.M. REGARDING TRIAL DATE (0.1).	1.3	\$819.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
8/24/2021	HDR	REVIEW CORRESPONDENCE REGARDING PLAINTIFFS SUPPL. DOCUMENT PRODUCTION. ATTEND TO MOSCOWITZ SUBPOENA. ATTEND TO LETTER TO JUDGE WILLIAMS REGARDING DISCOVERY ISSUES.	2.5	\$1,325.00
8/24/2021	TJO	REVIEW EMAIL FROM C. REISMAN REGARDING H. FREEMAN AS A POTENTIAL WITNESS (0.1); REVIEW DRAFT LETTER PREPARED BY J. RUE TO JUDGE WILLIAMS (0.1); CONFER WITH PARTNER (HDR) REGARDING RUE'S APPROACH TO JUDGE WILLIAMS (0.2); REVIEW AND REVISE HDR'S REVISIONS TO J. RUE'S DRAFT LETTER AND FORWARD REVISED LETTER TO J. RUE (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING REVISIONS TO LETTER AND APPROACH TO JUDGE WILLIAMS (0.1); EMAIL PARTNER (HDR) REGARDING DATES FOR MOSCOWITZ DEPOSITION (0.1); REVIEW DRAFT LETTER FROM J. RUE TO K. SORANNO REGARDING AMENDMENT TO ANSWERS TO INTERROGATORIES TO IDENTIFY WITNESSES (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING IDENTIFICATION OF ADDITIONAL WITNESSES, HOW MANY TO IDENTIFY AND WHICH ONES (0.2); FIVE TELEPHONE CONFERENCES WITH J. RUE REGARDING REVISIONS TO LETTER TO JUDGE WILLIAMS AND THE JUDGE'S INDIVIDUAL PREFERENCES (0.3).	1.3	\$819.00
8/24/2021	NMT	ATTEND TO DRAFT OF SUBPOENA TO HON. BARRY E. MOSCOWITZ.	0.2	\$47.00
8/24/2021	NMT	ATTEND TO DRAFT OF CORRESPONDENCE TO FICHERA REGARDING MOSCOWITZ SUBPOENA.	0.2	\$47.00
8/24/2021	NMT	ATTEND TO DRAFT OF CORRESPONDENCE TO SERANNO REGARDING MOSCOWITZ SUBPOENA.	0.2	\$47.00
8/24/2021	NMT	ATTEND TO DRAFT OF NOTICE OF INTENT TO ISSUE A SUBPOENA TO JUDGE MOSCOWITZ.	0.2	\$47.00
8/25/2021	HDR	CORRESP WITH COUNSEL FOR OAL REGARDING DEPOSITION CONFIDENTIALITY DESIGNATIONS. ATTEND TO CORRESPONDENCE REGARDING SAME.	1.0	\$530.00
8/25/2021	HDR	REVIEW CORRESPONDENCE REGARDING DOCUMENT REQUESTED DURING DEPOSITION.	0.1	\$53.00
8/25/2021	HDR	ATTEND TO PLTFF'S SUPPLEMENTAL DOCUMENT PRODUCTION.	0.1	\$53.00

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8/25/2021	TJO	ZOOM CONFERENCE WITH D. GILES AND J. RUE REGARDING PRODUCTION OF DOCUMENTS FROM NEW WITNESSES AND IDENTIFICATION OF WITNESSES (0.9); REVIEW EMAIL FROM L. FICHERA AND RESPOND REGARDING SCHEUDLING CONFERENCE CALL (0.1); EMAIL COURT REPORTER REGARDING SCHEDULING COVERAGE FOR MARANO DEPOSITION (0.1); REVIEW DEPOSITION NOTICE ISSUED BY THURSTON FOR HENDRICKS (0.1); REVIEW AND COMMENT ON DRAFT LETTER PREPARED BY J. RUE TO L. FICHERA REGARDING CONFIDENTIALITY DESIGNATIONS OF OAL DEPOSITION TRANSCRIPTS (0.2); EXCHANGE EMAILS WITH J. RUE REGARDING POSITIONS TAKEN IN DRAFT LETTER AND EXPRESSING CONCERNS ABOUT SAME (0.2); EMAIL K. SORANNO REGARDING SCHEDULING CONFERENCE CALL WITH SORANNO (0.1); DRAFT EMAIL TO J. RUE REGARDING STRATEGY FOR PRODUCING DOCUMENTS BY NEW WITNESS NAMED FEINBERG (0.3).	2.0	\$1,260.00
8/25/2021	MH	ATTEND TO SUPPLEMENTAL PRODUCTION AND REVIEW OF DISCOVERY/COORDINATION WITH RUE FIRM.	1.2	\$282.00
8/26/2021	HDR	REVIEW CORRESPONENCE REGARDING MEET & CONFER WITH OAL REGARDING DEPOSITION CONFIDENTIALITY ISSUES.	0.1	\$53.00
8/26/2021	HDR	ATTEND TO CORRESP TO DEFS REGARDING PLTFFS ADDITIONAL FACT WITNESSES. REVIEW CORRESPONDENCE REGARDING MEET AND CONFER WITH OAL REGARDING CERTAIN SUBPOENAS.	0.3	\$159.00
8/26/2021	TJO	THREE TELEPHONE CONFERENCES WITH J. RUE REGARDING PRODUCTION OF DOCUMENTS FROM NEW WITNESSES (0.2); TELEPHONE CONFERENCE WITH K. SORANNO REGARDING IDENTIFICATION OF NEW WITNESSES (0.4); TELEPHONE CONFERENCE WITH J. RUE REGARDING CALL WITH SORANNO AND SETTLEMENT DISCUSSIONS WITH SORANNO (0.4); TELEPHONE CONFERENCE WITH D. DWYER REGARDING DEPOSITION OF MARANO (0.3); DRAFT LETTER TO K. SORANNO REGARDING AMENDMENT TO ANSWERS TO INTERROGATORIES (0.3); TELEPHONE CONFERENCE WITH L. FICHERA REGARDING MOSCOWITZ DEPOSITION (0.2).	1.8	\$1,134.00
8/27/2021	HDR	ATTEND TO PRODUCTION OF SUPPL. PRODUCTION REGARDING FACT WITNESSES. RECEIVE AND REVIEW DEFS FIRST RESPONSES TO 2ND INTERROGS. RECEIVE DEFS SUPPL DOC PRODUCTION.	0.8	\$424.00
8/27/2021	HDR	RECEIVE/REVIEW CORRESP. FROM ADVERSARY TO COURT REGARDING DISCOVERY ISSUES. CORRESP. WITH CO COUNSEL REGARDING ISSUES SURROUNDING NEW WITNESSES.	0.4	\$212.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
8/27/2021	HDR	CORRESP WITH ADVERSARY REGARDING C. MARANO DEPOSITION. RECEIVE AND REVIEW ORDER OF COURT REGARDING ORAL ARGUMENT ON PENDING MOTIONS. CORRESP. WITH CO COUNSEL REGARDING SAME. TELECONFERENCE WITH TJO REGARDING SAME.	0.4	\$212.00
8/27/2021	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING MEET AND CONFER WITH FICHERA REGARDING OAL CONFIDENTIALITY DESIGNATIONS (0.1); DRAFT EMAILS TO J. RUE AND D. GILES REGARDING STATUS OF RESPECTIVE DOCUMENT PRODUCTIONS (0.1); REVIEW LETTER FROM K. SORANNO TO JUDGE WILLIAMS (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING PREPARATION OF RESPONSE TO SORANNO LETTER (0.1); STAFF DIRECTION REGARDING PRODUCTION OF DOCUMENTS RECEIVED FOM RUE AND GILES (0.1).	0.5	\$315.00
8/27/2021	BET	ATTEND TO/REVIEW, BATES STAMP MOREIRA DOCUMENTS AND PRODUCE TO K. SORANO.	0.4	\$94.00
8/28/2021	HDR	CORRESP. WITH CO-COUNSEL REGARDING STRATEGY REGARDING MARANO DEPOSITION.	0.1	\$53.00
8/29/2021	HDR	EDIT AND REVISE DRAFT LTR TO JUDGE WILLIAMS REGARDING DISCOVERY DISPUTES.	0.3	\$159.00
8/30/2021	HDR	RECEIVE/REVIEW TEXT ORDER OF COURT REGARDING ORAL ARGUMENT ON DELIB PROCESS PRIV. MOTIONS. INTERNAL CORRESP REGARDING MORANO DEPOSITION. REVIEW CORRESPONDENCE REGARDING SUPPL. PRODUCTION TO DEFS. ATTEND TO PLAINTIFFS CORRESP TO JUDGE WILLIAMS. REVIEW AND ANALYZE DEFS OBJECTIONS TO 2ND DISCOVERY DEMANDS. INTERNAL CORRES. REGARDING RECENT NJ SPECIAL ED RELATED DECISION.	1.5	\$795.00
8/30/2021	TJO	REVIEW THURSTON LETTER FILED WITH COURT (0.1); EMAIL J. RUE REGARDING THURSTON LETTER (0.2); TELEPHONE CONFERENCE WITH J. RUE (0.2); TELEPHONE CONFERENCE WITH CO-COUNSEL REGARDING MARANO DEPOSITION (0.5); BEGIN PREPARING FOR ORAL ARGUMENT ON MOTION TO COMPEL (0.6).	1.5	\$945.00
8/30/2021	MH	ATTEND TO PLAINTIFFS' PRODUCTIONS, CREATE FTPS FOR SERVICE, COORDINATE WITH RUE FIRM, REVIEW OF NJDOE'S PRODUCTIONS, RESPONSES TO DISCOVERY REQUESTS AND CORRESPONDENCE.	2.9	\$681.50
8/31/2021	HDR	REVIEW CORRESPONDENCE AND DEVELOP STRATEGY REGARDING MOSCOWITZ DEPOSITION. MEETING WITH TJO TO DISCUSS STRATEGY REGARDING 9.2.21 MOTION HEARING AND DISCOVERY AND TRIAL ISSUES.	0.5	\$265.00

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8/31/2021	HDR	INTERNAL CORRESP. REGARDING TRIAL SUBPOENAS. RECEIVE AND REVIEW OAL DOCUMENT PRODUCTION REGARDING MONTHLY REPORTS AD DISCUSS SAME WITH TJO. RECEIVE AND REVIEW DEFS RESPONSES TO 2ND RFAS.	0.3	\$159.00
8/31/2021	TJO	REVIEW CORREPONENCE FROM L. FICHERA TO J. RUE (0.1); REVIEW EMAIL FROM J. RUE REGARDING FICHERA LETTER AND RESPOND (0.1); REVIEW SUPPLEMENTAL DOCUMENT PRODUCTION FROM NJDOE RECEIVED ON AUGUST 27, 2021 (0.6); BEGIN PREPARING FOR MOSCOWITZ DEPOSTION (0.4); REVIEW CORRESPONDENCE FROM L. FICHERA REGARDING MOSCOWITZ DEPOSITION (0.1); DRAFT RESPONSIVE EMAIL TO FICHERA REGARDING SAME (0.2).	1.5	\$945.00
9/1/2021	HDR	ATTEND TO PLAINTIFFS' TRIAL SUBPOENAS. CORRESP. WITH CO COUNSEL REGARDING SAME.	0.5	\$265.00
9/1/2021	HDR	REVIEW CORRESPONENCE REGARDING SCHEDULING OF MOSCOWITZ DEPOSITION.	0.1	\$53.00
9/1/2021	HDR	ATTEND TO TRIAL SUBPOENAS.	0.5	\$265.00
9/1/2021	TJO	CONFER WITH J. RUE, D. SOUTAR AND C. REISMAN REGARDING STRATEGY (0.8); BEGIN PREPARING FOR ORAL ARGUMENT (0.4).	1.2	\$756.00
9/1/2021	NMT	ATTEND TO DRAFTS OF TRIAL SUBPOENAS, NOTICES OF TRIAL SUBPOENAS, AND NOTICES IN LIEU OF SUBPOENAS FOR SANDERS, WORTHINGTON, BASS, MOSCOWITZ, MARANO, HENDRICKS, ANTHONY, ROTA, AND EHLING.	1.7	\$399.50
9/2/2021	HDR	REVIEW/ANALYZE DEFS RESPONSES TO 2ND ROGS. REVIEW CORRESP. TO COURT REGARDING CO COUNSEL R. THURSTON.	0.7	\$371.00
9/2/2021	HDR	CORRESP. WITH ADVERSARY REGARDING MOSCOWITZ DEPOSITION.	0.1	\$53.00
9/2/2021	TJO	REVIEW BRIEFING, CASES CITED THEREIN AND PREPARE FOR ORAL ARGUMENT ON MOTIONS TO COMPEL AGAINST OAL AND NJDOE REGARDING DELIBERATIVE PROCESS PRVIILEGE (5.9); ARGUE MOTIONS BEFORE JUDGE WILLIAMS (1.8); ZOOM CONFERENCE WITH CO-COUNSEL AFTER ARGUMENT (0.3).	8.0	\$5,040.00
9/3/2021	HDR	DEVELOP STRATEGY REGARDING APPEAL OF USMJ APPEAL. ATTEND TO CORRESP. TO COURT REGARDING DELIB PROCESS PRIV.	1.4	\$742.00
9/3/2021	HDR	PARTICIPATE IN VIRTUAL HEARING BEFORE JUDGE WILLIAMS REGARDING DISCOVERY MATTERS. MTG WITH TJO REGARDING TRIAL AND DISCOVERY STRATEGY. RECEIVE AND AMENDED SCHEDULING ORDER. RECEIVE AND REVIEW MINUTES REGARDING COURT PROCEEDINGS.	2.2	\$1,166.00

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9/3/2021	HDR	RECEIVE AND REVIEW TRANSCRIPT OF 9.2.21 ORAL ARGUMENT. ATTEND TO TRIAL SUBPOENAS.	0.2	\$106.00
9/3/2021	TJO	REVIEW EMAIL FROM J. RUE REGARDING AVAILABILITY FOR CONSULTATION DURING HENDRICKS DEPOSITION (0.1); PROVIDE PARALEGAL WITH CREDIT CARD INFORMATION TO ORDER TRANSCRIPT (0.1); DRAFT LETTERS TO K. SORANNO AND L. FICHERA REGARDING CERTIFICATIONS FOR DELIBERATIVE PROCESS PRIVILEGE (2.4); REVIEW ORDER ENTERED BY COURT (0.1); EMAIL J. ROSENBERG REGARDING STATUS OF TRANSCRIPTS (0.1); ZOOM CONFERENCE REGARDING POTENTIAL APPEAL OF JUDGE WILLIAMS' RULING (0.6); TELEPHONE CONFERENCE WITH K. SORANNO (0.2); SECOND CALL WITH K. SORANNO REGARDING THURSTON DEPOSITION OF HENDRICKS (0.1); TELPEHONE CONFERENCE WITH D. DWYER AND J. RUE REGARDING SAME (0.3); LISTEN TO VOICEMAIL FROM L. FICHERA REGARDING SAME (0.1); THIRD TELEPHONE CONFERENCE WITH K. SORANNO REGARDING SAME (0.1).	3.6	\$2,268.00
9/3/2021	DDC	RESEARCH ON CIVIL RIGHTS / DELIBERATIVE PROCESS ISSUE FOR APPEAL.	3.2	\$1,440.00
9/3/2021	DDC	CALL WITH CO-COUNSEL REGARDING APPEAL OF DISCOVERY ORDER.	0.5	\$225.00
9/3/2021	NMT	ATTEND TO MULTIPLE COMMUNICATIONS WITH KING TRANSCRIPTION AND DIANA DOMAN TRANSCRIPTION REGARDING TRANSCRIPT OF HEARING BEFORE JUDGE WILLIAMS; ATTEND TO PAYMENT AND CIRCULATION OF SAME.	0.5	\$117.50
9/4/2021	HDR	DEVELOP STRATEGY REGARDING PRODUCTION FORM DEFS.	0.1	\$53.00
9/7/2021	HDR	RECEIVE AND REVIEW SAMPLE CASE FILES PRODUCED BY NJDOE. DEVELOP STRATEGY REGARDING SAME. ATTEND TO TRIAL SUBPOENAS.	0.8	\$424.00
9/7/2021	HDR	RECEIVE TRANSCRIPT REGARDING AUG 2021 PROCEEDINGS BEFORE JUDGE WILLIAMS REGARDING MOTION REGARDING DELIB PROCESS PRIVIL.	0.1	\$53.00
9/7/2021	TJO	DRAFT EMAIL TO C. KILKA REGARDING FAILURE TO PRODUCE J.L. V. SUMMIT CASE FILE (0.2); BEGIN REVIEWING OTHER SAMPLE CASE FILE DOCUMENTS PRODUCED BY NJDOE (2.3); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING PRETRIAL SUBMISSION (0.3).	2.8	\$1,764.00
9/7/2021	DDC	DRAFT BRIEF POINT IN SUPPORT OF APPEAL OF MAGISTRATE'S DECISION ON PRIVILEGE ISSUE.	4.8	\$2,160.00
9/8/2021	HDR	ATTEND TO TRIAL SUBPOENAS. ATTEND TO CORRESP REGARDING TRIAL SUBPOENAS. RECEIVE AND REVIEW MINS REGARDING 9.3.21 CONF.	1.5	\$795.00
9/8/2021	TJO	BEGIN REVIEWING AND REVISING DRAFT OF PRETRIAL ORDER PREPARED BY C. REISMAN.	8.0	\$5,040.00

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9/8/2021	MH	ATTEND TO SUPPLEMENTAL PRODUCTIONS, CORRESPONDENCE, ORDERS, DEPOSITION TRANSCRIPTS/EXHIBITS AND SUBPOENAS.	1.7	\$399.50
9/8/2021	NMT	ATTEND TO REVISIONS TO DRAFTS OF TRIAL SUBPOENAS, NOTICES OF TRIAL SUBPOENAS, AND NOTICES IN LIEU OF SUBPOENAS FOR SANDERS, WORTHINGTON, BASS, MOSCOWITZ, MARANO, HENDRICKS, ANTHONY, ROTA, AND EHLING; ATTEND TO DRAFTS OF LETTERS TO GUARANTEED SUBPOENA, SORRANO AND FISCHERA REGARDING SAME.	1.1	\$258.50
9/9/2021	HDR	DEVELOP STRATEGY REGARDING MOTION FOR SUMMARY JUDGMENT. ATTEND TO TRIAL SUBPOENA.	0.3	\$159.00
9/9/2021	HDR	MEETING W/ TJO TRE PROPOSED FINAL PRETRIAL ORDER.	0.1	\$53.00
9/9/2021	TJO	CONTINUE REVIEWING/REVISING PRETRIAL ORDER.	7.3	\$4,599.00
9/9/2021	NMT	ATTEND TO DRAFTS OF CORRESPONDENCE TO MOSCOWITZ, SANDERS, BASS, MARANO AND HENDRICKS REGARDING TRIAL SUBPOENAS AND CONTACT INFORMATION REGARDING SAME.	0.5	\$117.50
9/10/2021	HDR	RECEIVE/REVIEW DEFS SUPPL. PRODUCTION. RECEIVE/REVIEW FILINGS BY DEF REGARDING DELIB. PROCESS PRIVILEGE.	0.2	\$106.00
9/10/2021	HDR	REVIEW CORRESP. W/DEFS REGARDING SETTLEMENT AND STIP OF DISMISSAL. REVIEW CORRES. AND ORDER OF COURT REGARDING EXTENSION REGARDING OAL SUBMISSIONS REGARDING COURT RULING REGARDING DELIB PROCESS PRIV.	0.3	\$159.00
9/10/2021	TJO	CONTINUE REVISING/REVIEWING DRAFT PRETRIAL ORDER (2.1); ZOOM CONFERENCE WITH J. RUE AND D. SOUTAR (0.5); REVISE DRAFT LETTER TO L. FICHERA (0.4); TELEPHONE CONFERENCE WITH C. WEBER (0.1).	3.1	\$1,953.00
9/13/2021	HDR	REVIEW/ANALYZE FILINGS BY NJDOE REGARDING RULING BY COURT REGARDING DELIBERATIVE PROCESS PRIVIL.	0.3	\$159.00
9/13/2021	TJO	ZOOM CONFERENCE WITH J. RUE, D. SOUTAR AND C. REISMAN (1.3); REVIEW TRANSCRIPT OF ARGUMENT BEFORE JUDGE WILLIAMS (0.6); RESEARCH REGARDING WHETHER FEDERAL DELIBERATIVE PROCESS PRIVILEGE EXTENDS TO STATE AGENCIES IN CIVIL RIGHTS ACTION (4.1).	6.0	\$3,780.00
9/13/2021	MH	ATTEND TO POTENTIAL TRIAL EXHIBITS, DRAFT FPTO, TEAM EMAILS ON SHARED WORKSPACE AND COORDINATION WITH RUE FIRM REGARDING TRIAL/SJ.	1.1	\$258.50
9/14/2021	HDR	DEVELOP STRATEGY REGARDING APPEAL OF MJ DECISION ON DELIB PROCESS PRIVILGE. EDIT AND REVISE APPEAL BRIEF. PREPARE NOM, PROPOSED ORDER AND DECL.	3.0	\$1,590.00

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9/14/2021	HDR	REVIEW CORRESPONDENCE REGARDING OAL SUBMISSION REGARDING SANDERS AND BASS DEP TRANSCRIPTS.	0.1	\$53.00
9/14/2021	TJO	REVISE BRIEF POINT REGARDING DELIBERATIVE PROCESS PRIVILEGE CANNOT BE ASSERTED IN A CIVIL RIGHTS ACTION (4.5); REVIEW PRIVILEGE LOG AND CERTIFICATION FILED BY NJDOE ON 9.10.21 (0.5); REVIEW CORRESPONDENCE FROM L. FICHERA TO COURT REGARDING PRIVILEGE DESIGNATIONS REGARDING TRANSCRIPTS (0.3); CONTINUE REVISING PRETRIAL ORDER TO INCLUDE EXHIBITS FROM OTHER CASE FILES PRODUCED BY NJDOE (1.8).	7.1	\$4,473.00
9/14/2021	MH	ATTEND TO PLAINTIFFS' TEAM COLLABORATIVE WORKSPACE AND UPLOAD OF MATERIAL.	0.6	\$141.00
9/15/2021	HDR	DEVELOP STRATEGY REGARDING APPEAL OF JUDGE WILLIAMS DECISION REGARDING DEL PROCESS PRIV.	0.6	\$318.00
9/15/2021	TJO	CONTINUE DRAFTING/REVISING BRIEF REGARDING APPEAL FROM JUDGE WILLIAMS' DECISION.	7.6	\$4,788.00
9/16/2021	HDR	PREPARE LETTER TO THE COURT REGARDING BRIEFING SCHEDULE REGARDING DISPOSITIVE MOTIONS.	1.3	\$689.00
9/16/2021	HDR	ATTEND TO APPEAL OF MAG JUDGE DECISION ON DELIB PROCESS PRIV DECISION. CORRES. WITH CO COUNSEL REGARDING SAME. RECEIVE FINAL VERSION OF SAME.	0.3	\$159.00
9/16/2021	TJO	CONTINUE REVISING PRETRIAL ORDER TO ADD EXHIBITS FROM SAMPLE CASE FILES PRODUCED BY NJDOE (7.8); REVIEW CORRESPONDENCE FROM K. SORANNO TO JUDGE WILLIAMS REGARDING EXTENSION REQUEST TO DISPOSITIVE MOTION CYCLE (0.1); REVISE LETTERS PREPARED BY J. RUE AND PARTNER (HDR) REGARDING OPPOSITING EXTENSION REQUEST (0.2).	8.1	\$5,103.00
9/16/2021	MH	ATTEND TO APPEAL OF MJ DECISION AND ELECTRONICALLY FILE THE SAME.	0.3	\$70.50
9/17/2021	HDR	REVIEW ORDER FROM COURT REGARDING REVISED TRIAL SCHEDULE. INTERNAL CORRESP. REGARDING SAME. REVIEW ORDER OF COURT REGARDING MSJ SCHEDULE. RECEIVE OR REGARDING TRIAL SCHEDULE.	0.3	\$159.00
9/17/2021	HDR	REVIEW CORRESP W/R/T PROPOSED PRETRIAL ORDER EXHIBITS.	0.1	\$53.00
9/17/2021	TJO	CONTINUE REVISING AND ADDING TO STIPULATION OF FACTS FOR PRETRIAL ORDER.	6.5	\$4,095.00
9/18/2021	HDR	FIELD CORRESP. REGARDING TRIAL SCHEDULE/DATE.	0.1	\$53.00
9/18/2021	TJO	CONTINUE REVISING/ADDING TO STIPULATION OF FACTS FOR PRETRIAL ORDER.	5.8	\$3,654.00

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9/20/2021	HDR	RECEIVE AND REVIEW LETTERS BY J. RUE TO COURT REGARDING PRETRIAL CONF AND TRIAL START DATE. DEVELOP STRATEGY REGARDING SAME. RESEARCH REGARDING TRIAL HOUSEKEEPING CONF. BEFORE JUDGE HILLMAN.	0.5	\$265.00
9/20/2021	TJO	ZOOM CONFERENCE WITH J. RUE, D. SOUTAR, C. REISMAN, AND D. DWYER (1.0); CONTINUE REVISING FACT STIPULATION FOR PRETRIAL ORDER (1.2).	2.2	\$1,386.00
9/20/2021	MH	ATTEND TO POTENTIAL TRIAL EXHIBITS/REVISED FINAL PRETRIAL ORDER AND ADD TO COLLABORATIVE WORKSPACE.	0.3	\$70.50
9/20/2021	MH	ATTEND TO DISCOVERY, CORRESPONDENCE, NOTICES, AND ORDERS.	1.1	\$258.50
9/21/2021	TJO	REVIEW CORRESPONDENCE FILED BY J. RUE WITH COURT (0.2); EXCHANGE EMAILS WITH J. RUE REGARDING THREAT TO FILE OTSC IN RELATED CASE (0.3); REVIEW CORRESPONDENCE FILED BY K. SORANNO WITH COURT REGARDING EXTENSION REQUEST FOR TRIAL DATE (0.1); REVIEW AND REVISE FACT STIPULATION AND PRETRIAL ORDER (0.4).	1.0	\$630.00
9/22/2021	HDR	CONDUCT ANALYSIS/ANALYTICS REGARDING JUDGE HILLMAN RULINGS AND CASES. TELECOMMUNICATE. WITH TEAM REGARDING SAME.	1.8	\$954.00
9/23/2021	HDR	ATTEND TO CORRESP. TO COUNSEL FOR NJDOE REGARDING OUTSTANDING DISCOVERY.	0.4	\$212.00
9/23/2021	TJO	REVIEW AND COMMENT ON DRAFT RULE 56.1 STATEMENT OF FACTS FOR SUMMARY JUDGMENT MOTION (2.4); DRAFT LETTER TO K. SORANNO REGARDING OUTSTANDING DISCOVERY ISSUES (0.4); REVISE LETTER TO SORANNO BASED ON COMMENTS FROM CO-COUNSEL (0.1); REVIEW EMAIL FROM C. REISMAN REGARDING INCLUSION OF MOU TO RULE 56.1 STATEMENT (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING RULE 56.1 STATEMENT (0.1).	3.1	\$1,953.00
9/24/2021	HDR	ATTEND TO TRIAL SUBPOENAS.	0.1	\$53.00
9/24/2021	TJO	ZOOM CONFERENCE WITH J. RUE AND D. SOUTAR REGARDING PROOFS AND TRIAL STRATEGY.	1.4	\$882.00
9/25/2021	HDR	INTERNAL CORRESP REGARDING AMENDED PRETRIAL SCHEDULE.	0.1	\$53.00
9/25/2021	HDR	RECEIVE/REVIEW CORRESP. TO J. RUE REGARDING STUDENT RECORDS.	0.1	\$53.00
9/27/2021	TJO	ZOOM CONFERENCE WITH STEERING COMMITTEE (0.8); EXCHANGE EMAILS WITH C. REISMAN REGARDING ROGERS EMAILS TO ROTA (0.1).	0.9	\$567.00
9/27/2021	MH	UPLOAD DEPOSITIONS/EXHIBITS TO COLLABORATIVE WORKSPACE PER J. RUE REQUEST.	0.6	\$141.00

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Date	Person	Description of Services	Hours	Amount
9/28/2021	TJO	REVIEW EMAIL FROM C. REISMAN REGARDING RULE 56.1 STATEMENT.	0.1	\$63.00
9/29/2021	HDR	DEVELOP STRATEGY REGARDING BRIEFING SCHEDULE REGARDING APPEAL OF USMJ DECISION. EXCHANGE CORRESP. REGARDING MOTION TO SEAL REGARDING SUMMARY JUDGMENT BRIEFING.	0.2	\$106.00
9/29/2021	TJO	REVIEW AND COMMENT ON REVISED FRULE 56.1 STATEMENT (0.2); TELEPHONE CONFERENCE WITH K. SORANNO REGARDING OUTSTANDING DISCOVERY ISSUES (0.2).	0.4	\$252.00
9/30/2021	HDR	CORRESP FROM DEFS REGARDING BRIEFING SCHEDULE REGARDING APPEAL OF JUDGE WILLIAMS DECISION REGARDING DELIB PRIV PROCESS. RECEIVE AND REVIEW ORDER OF COURT REGARDING BRIEFING IN MJ APPEAL.	0.2	\$106.00
9/30/2021	TJO	REVIEW CORRESPONDENCE FROM K. SORANNO TO COURT REGARDING EXTENSION REQUEST (0.1); REVIEW EMAIL FROM L. FICHERA REGARDING EXTENSION REQUEST AND CONSENT TO SAME (0.1); ZOOM CONFERENCE WITH J. RUE REGARDING LITIGATION STRATEGY (0.2).	0.4	\$252.00
10/1/2021	TJO	ZOOM CONFERENCE WITH J. RUE, D. SOUTAR AND D. DWYER REGARDING LITIGATION STRATEGY.	0.8	\$504.00
10/1/2021	MH	ATTEND TO AMENDED SCHEDULING ORDER, APPEALS, AND CORRESPONDENCE.	0.6	\$141.00
10/3/2021	TJO	REVIEW TRANSCRIPT OF MARANO DEPOSITION (1.2); REVIEW TRANSCRIPT OF WORTHINGTON DEPOSITION (0.6).	1.8	\$1,134.00
10/4/2021	HDR	DISCUSSION REGARDING STRATEGY REGARDING TRIAL AND RELATED DEADLINES.	0.2	\$106.00
10/4/2021	TJO	ZOOM CONFERENCE WITH STEERING COMMITTEE (1.0); EXCHANGE EMAILS WITH CO-COUNSEL REGARDING MEETING WITH AMICI (0.1).	1.1	\$693.00
10/5/2021	HDR	CORRESP WITH TJO REGARDING STRATEGY REGARDING COUNSEL FOR DEFS. REVIEW CORRESPONDENCE REGARDING TRIAL SCHEDULE.	0.3	\$159.00
10/5/2021	TJO	REVIEW EMAIL FROM C. WEBER AND RESPOND (0.1); TELEPHONE CONFERENCE WITH C. WEBER REGARDING SORRANO FAMILY EMERGENCY (0.1); EMAIL J. RUE REGARDING CALL WITH WEBER (0.1); ZOOM CONFERENCE WITH CO-COUNSEL REGARDING CALL WITH WEBER AND ADJOURNMENT REQUEST (0.3); ZOOM CONFERENCE WITH J. RUE AND C. WEBER REGARDING SAME (0.5); SECOND TELEPHONE CONFERENCE WITH C. WEBER REGARDING REQUEST FOR 45 DAY ADJOURNMENT AND MORE INFO REGARDING SORANNO FAMILY EMERGENCY (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1); REVIEW LETTER FILED BY C. WEBER ON THE DOCKET (0.1).	1.4	\$882.00

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10/6/2021	HDR	CORRESP WITH T OLEARY REGARDING TRIAL SCHEDULE. EXCHANGE CORRESP WITH CO COUNSEL REGARDING DELIB PROCESS PRIVILEGE.	0.3	\$159.00
10/6/2021	TJO	EXCHANGE EMAILS WITH C. WEBER REGARDING EXTENSION REQUEST (0.1); EMAIL BASS DEPOSITION EXHIBITS TO D. SOUTAR (0.1).	0.2	\$126.00
10/6/2021	MH	ATTEND TO CALL WITH RUE FIRM ON SUBPOENAS AND COMPILE EXEMPLARS OF THE SAME.	0.5	\$117.50
10/7/2021	HDR	EXCHANGE EMAILS REGARDING TRIAL SCHEDULE.	0.3	\$159.00
10/7/2021	TJO	REVIEW TEXT ORDER FROM JUDGE WILLIAMS (0.1); TELEPHONE CONFERENCE WITH C. WEBER REGARDING TEXT ORDER ENTERED BY JUDGE (0.1); ZOOM CONFERENCE WITH CO-COUNSEL REGARDING SAME (0.3); TELEPHONE CONFERENCE WITH J. RUE, C. WEBER AND JUDGE WILLIAMS CHAMBERS REGARDING SAME (0.1); REVIEW AND COMMENT ON JOINT LETTER FROM J. RUE AND C. WEBER TO THE COURT REGARDING DISPOSTIVE MOTION DEADLINE (0.1); REVIEW TEXT ORDER FROM JUDGE HILLMAN (0.1).	0.8	\$504.00
10/8/2021	HDR	RECEIVE AND REVIEW NOTICE OF APPEARANCE FILED BY COUNSEL FOR NJDOE.	0.1	\$53.00
10/8/2021	TJO	TELEPHONE CONFERENCE WITH C. WEBBER (0.1); ZOOM CONFERENCE WITH AMICI (1.1).	1.2	\$756.00
10/11/2021	HDR	MTG. WITH TJO TO DISCUSS STRATEGY REGARDING 10-12-21 HEARING BEFORE JUDGE WILLIAMS REGARDING DELIB PROCESS PRIV ISSUES.	0.1	\$53.00
10/11/2021	TJO	REVIEW EMAIL FROM C. REISMAN REGARDING RULE 56.1 STATEMENT.	0.1	\$63.00
10/11/2021	MH	ATTEND TO DRAFT SUBPOENAS AND COORDINATION WITH RUE FIRM.	0.7	\$164.50
10/12/2021	TJO	PREPARE FOR HEARING WITH COURT REGARDING REVIEW OF PRIVILEGE LOGS AND CASELAW IN CASE COURT HOLDS ADDITONAL ARGUMENT (1.6); ATTEND HEARING ON MOTION REGARDING DELIBERATIVE PROCESS PRIVILEGE (2.1); ZOOM CONFERENCE WITH CO-COUNSEL AFTER HEARING ((0.6); TELEPHONE CONFERENCE WITH J. RUE (0.1).	4.4	\$2,772.00
10/13/2021	HDR	DEVELOP STRATEGY REGARDING SCHEDULING ISSUES REGARDING 12.15.21 FINAL PRETRIAL CONFER. REVIEW EMAIL FROM CO COUNSEL REGARDING SAME. RECEIVE AND REVIEW ORDER FROM COURT REGARDING SCHEDULED. CORRESP WITH CO-COUNSEL REGARDING SCHEDULING; CONFER WITH TJO REGARDING APPEAL OF JUDGE WILLIAMS RULING ON DELIBERATIVE PROCESS PRIVILEGE.	1.0	\$530.00

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10/13/2021	TJO	CONFER WITH PARTNER (HDR) REGARDING APPEAL OF JUDGE WILLIAMS' RULING ON DELIBERATIVE PROCESS PRIVILEGE ASSERTED BY OAL (0.4); REVIEW AND COMMENT ON JDR DRAFT LETTER REGARDING CONFLICT WITH PRETRIAL CONFERENCE (0.2); EXCHANGE EMAILS WITH J. RUE REGARDING SAME (0.2); REVIEW EMAILS FROM CO-COUNSEL REGARDING DECISION NOT TO APPEAL JUDGE WILLIAMS DECISION (0.1).	0.9	\$567.00
10/14/2021	HDR	CORRESP. WITH DENISE L. REGARDING TRIAL STRATEGY. RECEIVE AND REVIEW COURT MINUTES. REVIEW ORDER REGARDING MOTION TO COMPEL. REVIEW CORRESP REGARDING PRE TRIAL SCHEDULING.	0.5	\$265.00
10/14/2021	TJO	ZOOM CONFERENCE WITH J. RUE (0.4); TELEPHONE CONFERENCE WITH C. WEBER (0.1); REVIEW ORDER ENTERED BY COURT (0.1); ZOOM CONFERENCE WITH J. RUE AND D. SOUTAR REGARDING EDITS TO CORRESPONDENCE TO COURT (0.3).	0.9	\$567.00
10/14/2021	MH	ATTEND TO ORDERS, CORRESPONDENCE AND COORDINATION WITH RUE FIRM ON SUBPOENAS.	0.7	\$164.50
10/15/2021	HDR	RECEIVE AND REVIEW CORRESP FROM J. RUE REGARDING SCHEDULING REGARDING FINAL PRETRIAL CONF.	0.1	\$53.00
10/15/2021	TJO	TELEPHONE CONFERENCE WITH C. WEBER REGARDING SETTLEMENT (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING CALL WITH WEBER (0.2).	0.3	\$189.00
10/18/2021	TJO	EXCHANGE EMAILS WITH C. WEBER AND J. RUE REGARDING SCHEDULING CONFERENCE CALL (0.1); EMAIL ZOOM LINK TO WEBER AND J. RUE FOR CONFERENCE CALL (0.1).	0.2	\$126.00
10/19/2021	HDR	RECEIVE/REVIEW RESPONSE TO DEFS RESPONSE TO 9/23/21 DISCOVERY REQUEST.	0.1	\$53.00
10/19/2021	HDR	TELECOMMUNICATE. FROM COUNSEL FOR DEFENDANT REGARDING 9.23.21 LETTER RELATING TO DISCOVERY.	0.1	\$53.00
10/19/2021	HDR	REVIEW CORRESPONDENCE REGARDING TRIAL & PRETRIAL SCHEDULE. REVIEW CORRESPONDENCE REGARDING DOCUMENTS PRODUCED PER COURT'S RULING REGARDING DELIBERATIVE PROCESS PRIVILEGE.	0.2	\$106.00
10/19/2021	TJO	REVIEW NJDOE'S SUPPLEMENTAL DOCUMENT PRODUCTION (0.1); EMAIL CO-COUNSEL REGARDING SAME (0.1).	0.2	\$126.00
10/19/2021	MH	ATTEND TO ORDERS, CORRESPONDENCE, PRODUCTIONS, SUBPOENAS AND UPLOAD OF THE SAME.	0.7	\$164.50
10/20/2021	HDR	CORRESP REGARDING COUNSEL FOR NJDOE REGARDING 10/19/21 CORRESP REGARDING DISCOVERY.	0.1	\$53.00
10/20/2021	TJO	EXCHANGE MULTIPLE EMAILS WITH J. RUE (0.3); CONTINUE REVIEW OF SUMMARY JUDGMENT BRIEF (1.3).	1.6	\$1,008.00

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10/20/2021	MH	ATTEND TO COORDINATION WITH RUE FIRM ON DISCOVERY, DRAFT LIST OF THE SAME AND CREATE FTP.	3.1	\$728.50
10/21/2021	TJO	BEGIN REVIEWING LATEST DRAFT OF SUMMARY JUDGMENT MOTION.	0.6	\$378.00
10/22/2021	HDR	REVIEW CORRESPONDENCE FROM COUNSEL FOR OAL. REVIEW CORRESPONDNECE FROM CO COUNSEL REGARDING CLASS COMPLAINT FILE IN DNJ.	0.2	\$106.00
10/22/2021	TJO	ZOOM CONFERENCE WITH C. WEBER AND J. RUE.	0.8	\$504.00
10/23/2021	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING NEW SPEC EDUC PROPOSED CLASS ACTION FILED IN THE DNJ.	0.1	\$53.00
10/24/2021	HDR	DEVELOP STRATEGY REGARDING POTENTIAL RULE 11 SANCTIONS REGARDING OPPOSING PARTY.	0.3	\$159.00
10/25/2021	HDR	REVIEW ORDER FROM COURT REGARDING SCHEDULING OF FINAL PRETRIAL CONF.	0.1	\$53.00
10/25/2021	MH	ATTEND TO ORDER RESCHEDULING PRETRIAL CONFERENCE.	0.1	\$23.50
10/25/2021	MH	COMPILE MATERIAL FOR TRIAL PER RUE FIRM REQUEST AND CREATE FTP OF THE SAME.	1.4	\$329.00
10/26/2021	HDR	CORRESP. WITH TEAM REGARDING ELEVATION OF JUDGE WILLIAMS.	0.1	\$53.00
10/26/2021	MH	ATTEND TO TRIAL SUBPOENAS, SUPPORTING DOCUMENTS AND COORDINATION WITH RUE TEAM.	1.4	\$329.00
10/28/2021	HDR	ATTEND TO, REVIEW AND UPDATE PROPOSED TRIAL SUBPOENAS AND RELATED NOTICES.	0.8	\$424.00
10/28/2021	HDR	INTERNAL CORRESP REGARDING ELEVATION OF USMJ PRESIDING OVER CASE. REVIEW CORRESPONDENCE W/ CO COUNSEL REGARDING 15 DAY RULE.	0.2	\$106.00
10/28/2021	TJO	TELEPHONE CONFERENCE WITH C. REISMAN REGARDING CLASS CERTIFICATION ISSUES.	0.2	\$126.00
10/29/2021	HDR	ATTEND TO NOTICES IN LIEU AND TRIAL SUBPOENAS.	1.3	\$689.00
10/29/2021	TJO	FINALIZE NOTICES IN LIEU AND LETTER TO K. SORANNO REGARDING SERVING NOTICES IN LIEU (0.1); EMAIL L. FICHERA REGARDING ACCEPTANCE OF SERVICE OF TRIAL SUBPOENAS (0.1); EXCHANGE EMAILS WITH PARTNER (HDR) REGARDING TRIAL SUBPOENAS FOR THIRD PARTY WITNESSES (0.1).	0.3	\$189.00
10/31/2021	HDR	REVIEW CORRESPONDENCE FROM COUNSEL FROM COUNSEL FOR OAL REGARDING SERVICE OF TRIAL SUBPOENAS. DEVELOP STRATEGY REGARDING OAL CONFIDENTIALITY DESIGNATIONS.	0.2	\$106.00

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Date	Person	Description of Services	Hours	Amount
11/1/2021	HDR	ATTEND TO TRIAL SUBPOENAS TO BE ISSUED ON BEHALF OF PLAINTIFFS. REVIEW CORRESPONDENCE REGARDING OAL CONFIDENTIALITY DESIGNATIONS.	0.7	\$371.00
11/1/2021	TJO	REVIEW AND COMMENT ON TRIAL SUBPOENAS AND LETTERS TO WITNESSES (0.1); REVIEW LETTER FROM L. FICHERA REGARDING ACCEPTANCE OF SERVICE OF TRIAL SUBPOENAS (0.1).	0.2	\$126.00
11/2/2021	HDR	ATTEND TO TRIAL SUBPOENAS DIRECTED TO DEFENDANTS.	0.3	\$159.00
11/2/2021	HDR	PREPARE NOTICES IN LIEU OF SUBPOENA REGARDING DEFENDANTS. ATTEND TO TRIAL SUBPOENAS.	0.9	\$477.00
11/2/2021	TJO	ZOOM CONFERENCE WITH J. RUE REGARDING CLASS CERTIFICATION ISSUE (0.1); EMAIL PARTNERS (SE) AND (MDH) REGARDING SAME (0.1).	0.2	\$126.00
11/3/2021	HDR	ATTEND TO PLAINTIFFS' TRIAL SUBPOENAS. RECEIVE AND REVIEW CORRESPONDENCE FROM J RUE REGARDING OAL CONFIDENTIALITY DESIGNATIONS.	0.5	\$265.00
11/3/2021	TJO	REVIEW EMAILS FROM C. REISMAN AND J. RUE REGARDING CLASS CERTIFICATION ISSUE (0.2); REVISE CASES CITED THEREIN (0.8); EMAIL J. RUE AND C. REISMAN REGARDING THOUGHTS ON HOW TO HANDLE ISSUE (0.1); TELEPHONE CONFERENCE WITH C. REISMAN AND J. RUE REGARDING CLASS CERTIFICATION ISSUE (0.3).	1.4	\$882.00
11/3/2021	MH	ATTEND TO TRIAL SUBPOENAS, NOTICES OF SUBPOENA, NOTICES OF INTENT TO SERVE, CORRESPONDENCE AND COORDINATION WITH PROCESS SERVERS.	4.1	\$963.50
11/4/2021	MH	ATTEND TO DEPOSITION TRANSCRIPTS AND EXHIBITS.	0.5	\$117.50
11/5/2021	TJO	EMAIL J. RUE REGARDING DISMISSAL OF PI APPLICATION.	0.1	\$63.00
11/8/2021	HDR	ATTEND TO TRIAL SUBPOENAS TO BASS, SANDERS, MOSKOWITZ AND HENDRICKS.	0.4	\$212.00
11/8/2021	HDR	DEVELOP STRATEGY REGARDING REASSIGNMENT TO NEW MAGISTRATE. REVIEW CORRESPONDENCE REGARDING SAME. ATTEND TO TRIAL SUBPOENAS.	0.7	\$371.00
11/8/2021	TJO	ZOOM CONFERENCE WITH J. RUE. D. SOUTAR, C. REISMAN, AND D. DWYER REGARDING TRIAL PREPARATION (0.5); REVIEW NOTICE FROM COURT REGARDING NOTICE OF APPEARANCE BY KILKA (0.1); EXCHANGE EMAILS WITH K. SORANNO REGARDING SCHEDULING CONFERENCE CALL (0.1).	0.7	\$441.00
11/8/2021	MH	REVISE/FINALIZE NOTICES OF SUBPOENA, TRIAL SUBPOENAS AND DRAFT LETTERS ON THE SAME, AND ATTEND TO EMAIL TO ALL COUNSEL.	3.2	\$752.00
11/8/2021	MH	ATTEND TO ORDER OF REASSIGNMENT REGARDING MAGISTRATE AND J. RUE LETTER TO COURT.	0.2	\$47.00

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Date	Person	Description of Services	Hours	Amount
11/9/2021	HDR	REVIEW CORRESPONDENCE REGARDING ASSIGNMENT OF NEW USMJ. DEVELOP STRATEGY. DRAFT AND REVISE LETTER TO USMJ REGARDING FINAL PRETRIAL CONF.	0.8	\$424.00
11/9/2021	HDR	PERFORM WESTLAW RESEARCH REGARDING MATTERS/PROCEEDINGS BEFORE JUDGE SKAHILL, REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING FINAL PRETRIAL ORDER REQUIREMENTS. ATTEND TO CORRESPONDENCE TO JUDGE SKAHILL REGARDING FINAL PRETRIAL CONF. CORRESP WITH TEAM REGARDING JUDGE SKAHILL'S JUDICIAL PREFERENCES. REVIEW CORRESPONDENCE REGARDING SCHEDULING REGARDING COURT CONF.	0.8	\$424.00
11/9/2021	TJO	EMAIL K. SORANNO REGARDING RESCHEDULE CONFERENCE CALL TO DISCUSS SETTLEMENT (0.1); REVIEW EMAIL FROM E. HERLIHY REGARDING STATUS OF DISCOVERY RESPONSES (0.1); FINALIZE LETTER TO JUDGE SKAHILL (0.1).	0.3	\$189.00
11/9/2021	MH	ATTEND TO LETTER TO NEW MAGISTRATE AND ELECTRONICALLY FILE THE SAME.	0.3	\$70.50
11/10/2021	HDR	DEVELOP STRATEGY REGARDING SERVICE OF TRIAL SUBPOENAS ON C. MARANO.	0.2	\$106.00
11/10/2021	HDR	RECEIVE AND REVIEW AUTHORITY REGARDING 45 DAY RULE CASE ANALYSIS.	0.3	\$159.00
11/10/2021	TJO	EMAIL K. SORANNO REGARDING NEED TO RESCHEDULE CONFERENCE CALL.	0.1	\$63.00
11/10/2021	MH	ATTEND TO STATUS OF SERVICE AND TRIAL SUBPOENAS, DRAFT EMAIL TO WALSH TEAM REGARDING MARANO EVADING SERVICE AND FOLLOW-UP WITH PROCESS SERVER ON COST TO STAKE OUT.	0.7	\$164.50
11/12/2021	HDR	DEVELOP STRATEGY REGARDING SERVICE OF TRIAL SUBPOENA ON C. MARANO.	0.2	\$106.00
11/12/2021	TJO	REVIEW EMAILS EXCHANGED WITH C. LABIN REGARDING PRETRIAL ORDER.	0.1	\$63.00
11/15/2021	TJO	ZOOM CONFERENCE WITH C. REISMAN, J. RUE AND D. DWYER REGARDING TRIAL PREPARATION (1.2); TELEPHONE CONFERENCE WITH K. SORANNO, C. WEBER, AND J. RUE REGARDING SETTLEMENT (0.6); ZOOM CONFERENCE WITH C. REISMAN, J. RUE AND D. DWYER REGARDING CALL WITH SORANNO (0.2).	2.0	\$1,260.00
11/16/2021	TJO	REVIEW AND COMMENT ON SUMMARY JUDGMENT MOTION AND RULE 23(B)(2) CLASS CERTIFICATION MOTION.	4.6	\$2,898.00
11/16/2021	MH	ATTEND TO PROOFS OF SERVICE FOR SUBPOENAS AND SUGGESTIONS FOR NEXT STEP ON MARANO EVADING SERVICE.	0.4	\$94.00

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11/17/2021	TJO	REVIEW AND REVISE 30(B)(3) CLASS CERTIFICATION BRIEF (4.4); RESEARCH REGARDING WHETHER ENTIRE CONTROVERSY DOCTRINE REQUIRES MANDATORY JOINDER OF PARTIES (0.7).	5.1	\$3,213.00
11/18/2021	TJO	REVIEW AND COMMENT ON LATEST DRAFT OF SUMMARY JUDGMENT BRIEF (0.9); ZOOM CONFERENCE WITH C. REISMAN, J. RUE, AND D. DWYER REGARDING SCOPE OF RELIEF TO REQUEST IN S/J MOTION (0.5).	1.4	\$882.00
11/19/2021	TJO	VERIFY CITATIONS TO RECORD IN RULE 56.1 STATEMENT AND REVISE STATEMENT TO CONFORM TO RECORD (9.7); DRAFT NOTICE OF MOTION AND FORM OF ORDER FOR SUMMARY JUDGMENT MOTION (0.8); DRAFT NOTICE OF MOTIONS AND FORMS OF ORDER FOR CLASS CERTIFICATION MOTIONS (0.8).	11.3	\$7,119.00
11/22/2021	HDR	RECEIVE AND REVIEW FILINGS W/ THE COURT REGARDING MSJ AND REQUEST FOR PERMISSION TO FILE OVER LENGTH BRIEF. RECEIVE AND REVIEW COURT ORDER.	0.2	\$106.00
11/22/2021	HDR	REVIEW NOTICE FROM COURT SCHEDULING CONFERENCE; REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING COURT CONF DATE.	0.2	\$106.00
11/22/2021	HDR	REVIEW CORRESPONDENCE REGARDING MOTION TO SEAL.	0.1	\$53.00
11/22/2021	HDR	RECEIVE AND REVIEW CLASS CERTIF MOTION FILED BY PLTFF.	0.1	\$53.00
11/22/2021	TJO	REVIEW FINAL DRAFT OF MOTION PAPERS PRIOR TO FILING.	0.5	\$315.00
11/22/2021	MH	REVISE MOTIONS/SUPPORTING PAPERS, ATTEND TO EXHIBITS, TEAM CALL ON SUBMISSIONS, ELECTRONICALLY FILE THE SAME, AND CREATE FTP FOR SERVICE ON ALL COUNSEL.	4.4	\$1,034.00
11/23/2021	HDR	REVIEW DRAFT RULE 11 MOTION PAPERS. CONFER WITH TJO REGARDING SAME.	0.4	\$212.00
11/23/2021	HDR	ATTEND TO MOTION TO SEAL.	1.1	\$583.00
11/23/2021	HDR	REVIEW/ANALYZE PLTFFS FINAL MOTION FOR PARTIAL SUMM JUDGMENT. CORRESP WITH AGS OFFICE REGARDING DEFS 11.22.21 FILINGS. CONFER WITH TJO REGARDING STRATEGY REGARDING MOTION TO SEAL REGARDING PLTFFS 11.22.2021 FILINGS.	0.7	\$371.00
11/23/2021	HDR	REVIEW CORRESPONDENCE REGARDING JUDGE SKAHILLS TEXT ORDER OF 11/22/21.	0.1	\$53.00

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11/23/2021	TJO	EMAIL C. LABIN REQUESTING COPY OF EXHIBITS FILED IN SUPPORT OF STATE'S MOTION FOR SUMMARY JUDGMENT (0.1); DOWLOAD EXHIBITS (0.1); REVIEW EMAIL FROM C. REISMAN ADVISING THAT STATE'S MOTION INCLUDES DOCUMENTS SUPOEANED FROM SCHOOLS WHICH WERE NOT PRODUCED IN DISCOVERY (0.1); DRAFT LETTER TO K. SORANNO REGARDING SAME (0.2); REVIEW STATES'S RULE 56.1 STATEMENT AND ITS BRIEF IN SUPPORT OF MOTON FOR SUMMARY JUDGMENT (2.0); ZOOM CONFERENCE WITH J. RUE REGARDING RULE 11 LETTER TO STATE'S ATTORNEYS (0.2).	2.7	\$1,701.00
11/23/2021	MH	ATTEND TO ORDER SCHEDULING STATUS CONFERENCE WITH NEW MAGISTRATE.	0.1	\$23.50
11/23/2021	MH	REVIEW PLAINTIFFS' CONFIDENTIAL SUBMISSIONS FOR POTENTIAL REDACTIONS, ATTEND TO TEAM EMAILS REGARDING THE SAME, DRAFT LETTER TO MJ SETTING DEADLINE FOR REDACTIONS AND OMNIBUS MOTION TO SEAL, DRAFT TEMPLATE FOR L. CIV. R. INDEX IN SUPPORT OF MOTION TO SEAL AND FORWARD THE SAME TO TEAM.	2.4	\$564.00
11/24/2021	HDR	REVIEW CORRESPONDENCE REGARDING MOTION TO SEAL MSJ FILINGS. REVIEW CORRESPONDENCE REGARDING 12.6.21 HEARING.	0.3	\$159.00
11/24/2021	HDR	REVIEW CORRESP TO USMJ REGARDING SCHEDULING.	0.1	\$53.00
11/24/2021	TJO	REVIEW CORRESPONDENCE FROM NJDOE'S COUNSEL REGARDING REQUEST FOR TWO CYCLE ADJOURNMENT ON CLASS CERTIFICATION MOTION (0.1); EXCHANGE EMAILS WITH J. RUE AND C. REISMAN REGARDING SAME (0.1); REVIEW AND COMMENT ON LETTER FROM J. RUE TO NJDOE'S COUNSEL OBJECTING TO ADJOURNMENT REQUEST (0.1); REVIEW AND COMMENT ON LETTER FROM J. RUE TO COURT REQUESTING ALTERNATE DATE FOR CONFERENCE (0.1).	0.4	\$252.00
11/24/2021	MH	ATTEND TO CORRESPONDENCE, NJDOE MOTION FOR SUMMARY JUDGMENT, REVIEW THE SAME FOR CONFIDENTIALITY AND NOTES ON THE SAME.	0.9	\$211.50
11/26/2021	TJO	REVIEW EMAIL FROM C. REISMAN REGARDING BRIEF IN THIRD CIRCUIT APPEAL REFERENCING LENGHTY DELAY IN GETTING HEARING DATES IN THAT CASE.	0.1	\$63.00
11/29/2021	HDR	ATTEND TO RULE 7.1 LETTER TO THE COURT REGARDING RESPONSE TO DEFS MOTION FOR SUMM JUDGMENT. REVIEW CORRESPONDENCE REGARDING SAME. REVIEW CORRESPONDENCE FROM THE COURT REGARDING EXTENSION OF TIME REGARDING CLASS CERT MOTION. REVIEW CORRESPONDENCE REGARDING DEFS EXTENSION REQUEST REGARDING CLASS MOTION.	0.9	\$477.00
11/29/2021	HDR	REVIEW PROPOSED RULE 11 MOTION. CORRES W CO COUNSEL REGARDING SAME.	0.3	\$159.00

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11/29/2021	TJO	ZOOM CONFERENCE WITH J. RUE, C. REISMAN, AND D. DWYER REGARDING TRIAL PREPARATIONS (0.7); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING OPPOSITION TO STATE'S SUMMARY JUDGMENT MOTION (0.1); REVIEW RULE 11 MOTION AND EMAIL J. RUE WITH COMMENTS ON SAME (0.2).	1.0	\$630.00
11/29/2021	MH	ATTEND TO ORDER RESCHEDULING CONFERENCE.	0.1	\$23.50
11/29/2021	MH	ATTEND TO SERVICE OF COURTESY COPIES, DRAFT LETTER TO JUDGE HILLMAN ON THE SAME AND CREATE VOLUME COVER PAGES FOR CERTIFICATIONS, REVISE 7.1 EXTENSION LETTER FOR OPPOSITION TO SUMMARY JUDGMENT MOTION AND ELECTRONICALLY FILE THE SAME.	1.9	\$446.50
11/30/2021	HDR	CORRESP REGARDING SERVICE ISSUES REGARDING TRIAL SUBPOENAS. RECEIVE AND REVIEW CORRESP FROM ADVERSARY REGARDING APPEAL DEADLINE.	0.2	\$106.00
11/30/2021	HDR	REVIEW CORRESPONDENCE REGARDING RESET DEADLINE REGARDING SUMMARY JUDGMENT.	0.1	\$53.00
11/30/2021	TJO	REVIEW REVISED DRAFT OF RULE 11 BRIEF AND REVISE SAME (0.5); REVIEW EMAIL FROM C. KLIKSA REGARDING EXTENSION REQUEST TO SUBMIT OPPOSITION TO APPEAL OF JUDGE WILLIAMS' DECISION AND RESPOND (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING RULE 11 BRIEF (0.2).	0.8	\$504.00
11/30/2021	MH	ATTEND TO CORRESPONDENCE TO COURT, ORDERS, AND FOLLOW-UP WITH T. O'LEARY REGARDING MARANO EVADING SERVICE.	0.7	\$164.50
12/1/2021	TJO	REVIEW CORRESPONDENCE FROM C. KLISKA REGARDING EXTENSION OF TIME TO SUBMIT OPPOSITION AND REVIEW ORDER GRANTING REQUEST (0.1); REVIEW CORRESPONDENCE FROM L. FICHERA REGARDING SAME AND REVIEW ORDER GRANTING EXTENSION REQUEST (0.1).	0.2	\$126.00
12/1/2021	MH	ATTEND TO REVIEW OF TEAM NOTES ON CONFIDENTIAL SUBMISSIONS AND DRAFT OF MOTION TO SEAL.	4.5	\$1,057.50
12/2/2021	TJO	REVIEW CORRESPONDENCE FROM C. LABIN TO COURT REGARDING RULE 7.1 EXTENSION (0.1); REVIEW EMAIL FROM J. RUE TO ADVERSARY COUNSEL SERVING UPDATED RULE 11 MOTION PAPERS (0.1).	0.2	\$126.00
12/3/2021	HDR	REVIEW CORRESPONDENCE REGARDING DEADLINES FROM MSJ.	0.1	\$53.00
12/3/2021	TJO	REVIEW NOTICE FROM COURT REGARDING 12/14 STATUS CONFERENCE.	0.1	\$63.00
12/3/2021	MH	ATTEND TO DEFENDANT'S 7.1 EXTENSION, ORDER GRANTING THE SAME, AND ORDER RESCHEDULING CONFERENCE WITH MAGISTRATE.	0.3	\$70.50

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SERVICES

Date	Person	Description of Services	Hours	Amount
12/6/2021	HDR	ATTEND TO JOINT LETTER TO THE COURT REGARDING OMNIBUS MOTION TO SEAL MSJ BRIEFING. RECEIVE/REVIEW CORRESP FILED BY DEFS REGARDING MSJ RETURN DATES.	0.4	\$212.00
12/6/2021	MH	REVISE LETTER TO JUDGE REQUESTING EXTENSION TO FILE REDACTIONS AND LEAVE TO FILE OMNIBUS MOTION TO SEAL, ATTEND TO EMAILS/ADDITIONAL COMMENTS AND ELECTRONICALLY FILE THE SAME.	0.7	\$164.50
12/7/2021	HDR	REVIEW CORRESPONDENCE REGARDING STRATEGY REGARDING PROPOSED MOTION TO SEAL.	0.1	\$53.00
12/7/2021	HDR	REVIEW CORRESPONDENCE REGARDING LETTER TO THE COURT REGARDING OMNIBUS MOTION TO SEAL.	0.1	\$53.00
12/7/2021	TJO	BEGIN REVIEWING/REVISING RESPONSE TO STATE'S RULE 56.1 STATEMENT.	4.2	\$2,646.00
12/7/2021	MH	ATTEND TO LETTER FROM K. SORRANO.	0.1	\$23.50
12/8/2021	HDR	CORRESP WITH CO COUNSEL REGARDING STRATEGY REGARDING DISCOVERY ISSUES.	0.1	\$53.00
12/8/2021	TJO	CONTINUE DRAFTING/REVISING RESPONSE TO STATE'S RULE 56.1 STATEMENT.	7.3	\$4,599.00
12/9/2021	HDR	REVIEW FILINGS BY DEFENDANTS REGARDING USMJ APPEAL REGARDING DELIB PROCESS PRIVIL. REVIEW CORRESPONDENCE RE DEPOSITION SUMMARIES. RECEIVE AND REVIEW COURT ORDER.	0.2	\$106.00
12/9/2021	TJO	CONTINUE DRAFTING/REVISIONG REPOSENSE TO STATE'S RULE 56.1 STATEMENT.	8.0	\$5,040.00
12/9/2021	MH	ATTEND TO CALL WITH T. O'LEARY REGARDING DEPOSITION SUMMARIES/TRIAL.	0.2	\$47.00
12/10/2021	HDR	REVIEW CORRESPONDENCE REGARDING RE SUPPL DOCUMENTS PRODUCED BY NJDOE.	0.2	\$106.00
12/10/2021	HDR	ATTEND TO ISSUES SURROUNDING SCHEDULING REGARDING REPLY REGARDING USMJ APPEAL REGARDING DELIB PROCESS PRIVILEGE. ATTEND TO MOTION TO SEAL. REVIEW CORRESPONDENCE RE DEFS OPPOSITION TO MJ APPEAL RE DELIB PROCESS PRIVIL. CORRSP WITH COUNSEL FOR NJDOE RE SAMPLE CASE FILES.	1.1	\$583.00
12/10/2021	TJO	CONTINUE DRAFTING RESPONSE TO STATE'S RULE 56.1 STATEMENT.	7.4	\$4,662.00
12/10/2021	DDC	REVIEW ALL PAPERS SUBMITTED IN RELATION TO MOTION TO REVERSE USMJ'S PRIOR DECISION.	5.2	\$2,340.00
12/10/2021	MH	REVISE SUBPOENA, NOTICE AND LETTER TO MARANO, COORDINATE WITH COURIER ON ATTEMPT TO SERVE AGAIN, ATTEND TO LETTER TO JUDGE HILLMAN REGARDING REPLY DEADLINE, AND ELECTRONICALLY FILE THE SAME.	0.8	\$188.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
12/11/2021	HDR	CORRESP WITH AG'S OFFICE REGARDING SUPPL DISCOVERY BY DEFS.	0.1	\$53.00
12/12/2021	HDR	RECEIVE AND REVIEW CORRSP FILED BY DEFENDANTS SEEKING EXTENSION OF TIME TO FILE PRETRIAL ORDER.	0.1	\$53.00
12/13/2021	HDR	RECEIVE AND REVIEW CORRESP FILED BY J RUE REGARDING FINAL PRETRIAL ORDER. DEVELOP STRATEGY REGARDING FINAL PRETRIAL ORDER. EXCHANGE CORRESP REGARDING PROPOSED FINAL PRETRIAL ORDER.	0.4	\$212.00
12/13/2021	TJO	CONTINUE DRAFTING RESPONSES TO STATE'S RULE 56.1 STATEMENT INSOFAR AS IT RELATES TO A.S. FAMILY (6.9); REVIEW LETTER FILED BY DAG LABIN (0.1); REVIEW AND COMMENT ON RESPONSIVE LETTER PREPARED BY J. RUE (0.3).	7.3	\$4,599.00
12/13/2021	DDC	BEGIN DRAFTING REPLY BRIEF REGARDING MOTION TO OVERTURN USMJ DECISION.	4.0	\$1,800.00
12/13/2021	MH	ATTEND TO LETTERS TO JUDGES AND ORDERS.	0.3	\$70.50
12/14/2021	HDR	CORRESP WITH T OLEARY REGARDING PROPOSED MOTION IN LIMINE. ATTEND TO MOTION IN LIMINE REGARDING CURRENT DOE PRACTICES. PREPARE NOM AND PROPOSED ORDER REGARDING SAME.	1.5	\$795.00
12/14/2021	HDR	DEVELOP STRATEGY REGARDING COURT'S RULING REGARDING CONFIDENTIALITY ISSUES.	0.3	\$159.00
12/14/2021	TJO	PARTICIPATE IN STATUS CONFERENCE WITH JUDGE SKAHILL (0.9); PARTICIATE IN ZOOM CONFERENCE WITH CO-COUNSEL AFTER CONFERENCE WITH JUDGE (0.4); REVIEW MINUTE ENTRY FROM COURT (0.1); REVIEW ORDER GRANTING EXTENSION TO FILE MOTION TO SEAL (0.1); CONTINUE REVIEWING AND REVISING D.O. AND S.B.C. RESPONSES TO STATE'S RULE 56.1 STATEMENT (5.3); REVIEW STATES'S RESPONSE TO PRE-TRAL ORDER (0.2); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING STATE'S RESPONSE TO RULE 56.1 STATEMENT (0.3); CONFER WITH PARTNER (HDR) REGARDING SAME (0.2); EMAIL CO-COUNSEL SUGGESTING IMMEDIATE MEET AND CONFER WITH STATE (0.1); EMAIL C. LABIN REGARDING SAME (0.1); EMAIL ZOOM LINK FOR MEET AND CONFER TO ALL COUNSEL (0.1).	7.7	\$4,851.00
12/14/2021	DDC	CONTINUE DRAFTING REPLY BRIEF REGARDING MOTION TO OVERTURN USMJ DECISION.	1.6	\$720.00
12/14/2021	DDC	CASE LAW RESEARCH IN SUPPORT OF REPLY BRIEF REGARDING MOTION TO OVERTURN USMJ DECISION.	3.2	\$1,440.00
12/14/2021	MH	CALL WITH T. O'LEARY ON LOGISTICS/SCHEDULE AND ATTEND TO ORDER ON OMNIBUS MOTION TO SEAL.	0.3	\$70.50

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Date	Person	Description of Services	Hours	Amount
12/15/2021	TJO	ZOOM CONFERENCE WITH C. REISMAN REGARDING STATE'S OBJECTIONS TO PTO (0.4); ZOOM CONFERENCE WITH C. REISMAN, D. DWYER, H. RUIZ AND DAGS REGARDING PTO (0.7); PARTICIPATE IN TWO OTHER ZOOM CONFERENCES WITH C. REISMAN REGARDING PTO AND CONTINUE REVISING M.S. RESPONSES TO STATE'S RULE 56.1 STATEMENT (5.2).	6.3	\$3,969.00
12/15/2021	DDC	FINISH DRAFTING REPLY BRIEF REGARDING MOTION TO OVERTURN USMJ DECISION.	5.6	\$2,520.00
12/15/2021	DDC	ADDITIONAL CASE LAW RESEARCH IN SUPPORT OF REPLY BRIEF REGARDING MOTION TO OVERTURN USMJ DECISION.	3.0	\$1,350.00
12/15/2021	MH	REVIEW ROTA DEPOSITION TRANSCRIPT AND DRAFT DEPOSITION SUMMARY.	2.9	\$681.50
12/16/2021	TJO	REVIEW AND EDIT REPLY BRIEF REGARDING APPEAL OF WILLIAMS' DECISION (0.3); DRAFT SUPPORTING CERTIFICATION AND INSERT CITES TO RECORD INTO REPLY BRIEF (0.6); MULTIPLE TELEPHONE CONFERENCES WITH C. REISMAN REGARDING PRETRIAL ORDER (0.6); REVIEW REVISIONS TO PRETRIAL ORDER AND COMMENT ON SAME (0.6); CONTINUE DRAFTING/REVISING E.M. PORTION AND Y.H.S. PORTIONS OF RESPONSE TO RULE 56.1 STATEMENT (5.4).	7.5	\$4,725.00
12/16/2021	DDC	FINAL REVISIONS TO DRAFT REPLY BRIEF REGARDING MOTION TO OVERTURN USMJ DECISION BEFORE SENDING TO CO-COUNSEL.	3.6	\$1,620.00
12/16/2021	MH	ATTEND TO ORDER REGARDING OAL CONFIDENTIALITY DESIGNATIONS.	0.1	\$23.50
12/17/2021	HDR	DRAFT/REVISE MOTION IN LIMINE TO PRECLUDE EVIDENCE REGARDING CURRENT PRACTICES.	5.4	\$2,862.00
12/17/2021	HDR	RECEIVE AND REVIEW PRETRIAL MEMORANDUM FILED BY PLTFFS.	0.1	\$53.00
12/17/2021	TJO	REVIEW AND COMMENT ON DRAFT OF PTO (0.6); REVIEW AND REVISE REPY BRIEF REGARDING APPEAL OF JUDGE WILLIAMS' DECISION (0.4); CONTINUE DRAFTING RESPONSE TO STATE'S RULE 56.1 STATEMENT (0.5).	1.5	\$945.00
12/20/2021	HDR	DRAFT AND REVISE MOTION IN LIMINE REGARDING NJDOE CURRENT PRACTICES.	3.3	\$1,749.00
12/20/2021	TJO	TELEPHONE CONFERENCE WITH C. REISMAN (0.2); PARTICIPATE IN ZOOM CONFERENCE REGARDING STEERING COMMITTEE MEETING (1.0); SECOND TELEPHONE CONFERENCE WITH C. REISMAN (0.1); REVIEW AND COMMENT ON REPLY BRIEF (0.3); TELEPHONE CONFERENCE WITH J. RUE (0.1).	1.7	\$1,071.00
12/21/2021	HDR	RECEIVE AND REVIEW NJDOE ADJOURNMENT REQUEST. ATTEND TO CORRESP TO COURT OBJECTION TO NJDOE EXT REQUEST.	0.6	\$318.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
12/21/2021	HDR	ATTEND TO MOTION IN LIMINE NO. 1 RE PRECLUSION OF EVID OF CURRENT PRACTICES. REVIEW ORDER RE CASE SCHEDULE. CORRESP WITH TEAM RE PROPOSED LETTER TO THE COURT.	1.0	\$530.00
12/21/2021	TJO	PREPARE FOR PRETRIAL CONFERENCE (0.2); REVIEW EMAIL FROM C. LABIN REGARDING REQUEST FOR CONSENT TO ADJOURN CONFERENCE (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1); PARTICIPATE IN ZOOM CONFERENCE WITH CO-COUNSEL PRIOR TO PRE TRIAL CONFERENCE (0.4); ATTEND PRE TRIAL CONFERENCE WITH JUDGE SKAHILL (1.7); PARTICPATE IN ZOOM CONFERENCE AFTER PRE-TRIAL CONFERENCE (0.3); REVIEW TEXT ORDER REGARDING SCHEDULING SECOND CONFERENCE (0.1); PARTICIPATE IN SECOND ZOOM CONFERENCE WITH CO-COUNSEL PRIOR TO CALL WITH JUDGE SKAHILL (0.2); pARTICIPATE IN SECOND CALL WITH JUDGE SKAHILL (0.2); CONTINUE DRAFTING RESPONSE TO STATE'S RULE 56.1 STATEMENT (3.9); REVIEW LETTER FROM C. LABIN TO JUDGE HILLMAN REGARDING ADJOURNMENT REQUEST (0.1); REVIEW AND REVISE DRAFT LETTER FROM J. RUE REGARDING OBJECTING TO ADJOURNMENT REQUESET (0.5).	7.8	\$4,914.00
12/22/2021	HDR	DRAFT/ REVISE BRIEF ISO MOTION IN LIMINE #1 TO PRECLUDE TESTIMONY OF CURRENT PRACTICES. RECEIVE ORDER REGARDING AMENDMENT OF CAPTION.	1.1	\$583.00
12/22/2021	HDR	DRAFT AND REVISE MOTION IN LIMINE REGARDING PRECLUSION OF EVIDENCE OF CURRENT PRACTICES. REVIEW CORRESPONDENCE REGARDING TRIAL SUBPOENA ON MARANO.	3.7	\$1,961.00
12/22/2021	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING STRATEGY REGARDING OMNIBUS MOTION TO SEAL.	0.1	\$53.00
12/22/2021	HDR	DEVELOP STRATEGY REGARDING NJDOE'S EXTENSION REQUEST REGARDING MOTIONS IN LIMINE AND MSJ BRIEFING SCHEDULE.	0.3	\$159.00
12/22/2021	TJO	REVIEW AND COMMENT ON DRAFT PORTION OF IN LIMINE MOTION PREPARED BY PARTNER (HDR) (0.3); EMAIL DRAFT TO CO-COUNSEL (0.1); REVIEW EMAIL FROM J. VALVERDE AND RESPOND (0.1); ZOOM CONFERENCE WITH J. VALVERDE REGARDING STATUS OF LITIGATION (0.5); TELEPHONE CONFERENCE WITH J. RUE REGARDING DIRECT EXAMINATION OF R. SPAR (0.2); REVIEW AND COMMENT ON LATEST DRAFT OF OMNIBUS MOTION IN LIMINE (1.0); CONTINUE DRAFTING E.M. PORTION OF RESPONSE TO STATE'S RULE 56.1 STATEMENT (2.2).	4.4	\$2,772.00
12/22/2021	MH	ATTEND TO LETTERS TO COURT, PROPOSED FINAL PRETRIAL ORDER; REVIEW DRAFT MOTION IN LIMINE MOTION/SUPPORTING PAPERS.	1.2	\$282.00

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Date	Person	Description of Services	Hours	Amount
12/22/2021	MH	ATTEND TO CALL WITH SKIP TRACE COMPANY REGARDING MARANO EVADING SERVICE.	0.3	\$70.50
12/23/2021	HDR	DRAFT AND REVISE PLTFF MOTION IN LIMINE #1 TO PRECLUDE EVIDENCE OF CURRENT PRACTICES.	1.0	\$530.00
12/23/2021	TJO	REVIEW ORDER FROM COURT DENYING ADJOURNMENT REQUEST (0.1); REVIEW AND FINALIZE IN LIMINE MOTION PAPERS (0.4); REVIEW STATES'S MOTION IN LIMINE (0.2); CONTINUE DRAFTING RESPONSE TO STATE'S RULE 56.1 STATEMENT (1.5).	2.2	\$1,386.00
12/23/2021	MH	ATTEND TO MOTION IN LIMINE/SUPPORTING PAPERS AND ELECTRONICALLY FILE THE SAME.	0.8	\$188.00
12/27/2021	HDR	TELCON WITH TJO TO DISCUSS STRATEGY REGARDING TRIAL LOGISTICS. EDIT AND REVISE LETTER TO THE COURT REGARDING TRIAL LOGISTICS.	0.7	\$371.00
12/27/2021	TJO	ZOOM CONFERENCE WITH CO-COUNSEL REGARDING STEERING COMMITTEE MEETING (1.3); REVIEW ORDER FROM COURT REGARDING EXTENSION OF TIME FOR STATE TO FILE OPPOSITION TO MOTIONS (0.1); EMAIL C. LABIN REGARDING EXTENSION REQUEST (0.1); CONTINUE DRAFTING/REVISING RESPONSE TO E.M.'S AND M.M.'S PORTIONS OF STATE'S RULE 56.1 STATEMENT (4.5).	6.0	\$3,780.00
12/28/2021	HDR	REVIEW AND ANALYZE DEF NJDOE MOTION IN LIMINE. REVIEW 12.28.21 CORRESP TO THE COURT FROM DOE REGARDING TRIAL START DATE. REVIEW CORRESP TO THE COURT REGARDING DEADLINE TO SUBMIT FINAL PRETRIAL ORDER.	0.6	\$318.00
12/28/2021	HDR	REVIEW CORRESPONDENCE RE AMENDING CASE CAPTION.	0.1	\$53.00
12/28/2021	TJO	CONTINUE DRAFTING/REVISING LG'S RESPONSE TO STATE'S RULE 56.1 STATEMENT.	2.2	\$1,386.00
12/29/2021	HDR	RECEIVE AND REVIEW ORDER FROM COURT RELATING TO TRIAL DATE AND FINAL PRETRIAL ORDER.	0.1	\$53.00
12/29/2021	TJO	CONTINUE DRAFTING/REVISING LG'S RESPONSE TO STATE'S RULE 56.1 STATEMENT.	0.6	\$378.00
12/30/2021	HDR	RECEIVE/REVIEW CORRESP FORM CO COUNSEL TO COURT REGARDING TRIAL LOGISTICS. CORRESP WITH TJO REGARDING COURT'S STANDING ORDER IN DNJ REGARDING IN PERSON PROCEEDINGS.	0.2	\$106.00
12/30/2021	TJO	REVIEW AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN (0.2); EMAIL J. RUE REGARDING STRATEGY ON PRESENTING LETTER TO JUDGE (0.1).	0.3	\$189.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
1/3/2022	TJO	PARTICIPATE IN ZOOM CONFERENCE REGARDING STEERING COMMITTEE MEETING (1.2); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING REPONSE TO RULE 56.1 STATEMENT (0.2); CONTNUE DRAFTING/REVISING RESPONSE TO RULE 56.1 STATEMENT SUBMITTED BY STATE (5.1).	6.5	\$4,095.00
1/3/2022	MH	ATTEND TO NJDOE MOTION IN LIMINE, CORRESPONDENCE AND ORDERS; UPDATE PLAINTIFFS' TEAM CALENDAR.	0.7	\$164.50
1/4/2022	HDR	RECEIVE AND REVIEW OPPOSITION TO OPP TO MOTIONS IN LIMINE FILED WITH COURT.	0.1	\$53.00
1/4/2022	HDR	RECEIVE/REVIEW SANCTIONS MOTION FILED BY PLTFF.	0.1	\$53.00
1/4/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING COMMENTS ON REPLY BRIEF (0.1); ZOOM CONFERENCE WITH J. RUE AND J. WASSERMAN REGARDING SAME (0.4); CONTINUE DRAFTING RESPONSE TO STATE'S RULE 56.1 STATEMENT (4.7).	5.3	\$3,339.00
1/5/2022	HDR	REVIEW CORRESPONDENCE REGARDING PLTFFS MOTION IN LIMINE OPPOSITION FILED UNDER SEAL. ATTEND TO ISSUES REGARDING SERVICE OF TRIAL SUBPOENA ON MARANO.	0.2	\$106.00
1/5/2022	HDR	REVIEW AND ANALYZE THE PARTIES OPPOSITIONS TO MOTIONS IN LIMINE.	1.0	\$530.00
1/5/2022	TJO	CONTNUE REVISING RULE 56.1 STATYEMENT (0.5); REVIEW REVISED GENERAL STATEMENT FOR DO'S CASE PREPARED BY C. REISMAN AND LOCATE SOURCE DOCUMENTS (1.8); EMAIL J. RUE REGARDING MISSING SOURCE DOCUMENTS (0.1).	2.4	\$1,512.00
1/5/2022	MH	ATTEND TO MULTIPLE FOLLOW-UPS WITH PRIVATE INVESTIGATOR REGARDING SERVICE OF TRIAL SUBPOENA ON MARANO AND LOGISTICS FOR THE SAME, DRAFT SUMMARY OF EVADING SERVICE WITH ADDITIONAL INFO ON MARANO, FORWARD PICTURES AND CALL WITH T. O'LEARY ON THE SAME.	1.3	\$305.50
1/6/2022	TJO	PREPARE FOR ZOOM CONFERENCE WITH R. SPAR (0.7); ZOOM CONFERENCE WITH R. SPAR. (1.5); REVIEW FILE TO DETERMINE HISTORY OF DEFENDANTS' DISCOVERY PERIOD ARGUMENT AND EMAIL C. REISMAN REGARDING SAME (0.6.).	2.8	\$1,764.00
1/6/2022	MH	ATTEND TO OPPOSITIONS TO MOTIONS IN LIMINE, AND CORRESPONDENCE.	0.4	\$94.00
1/6/2022	MH	RESEARCH EVASION OF SERVICE AND ATTEND TO TEAM EMAILS REGARDING LOGISTICS FOR SERVICE ON MARANO.	0.4	\$94.00
1/6/2022	MH	PULL CASE LAW FOR FINDINGS OF FACT FOR OMNIBUS MOTION TO SEAL.	0.5	\$117.50

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1/7/2022	HDR	RECEIVE AND REVIEW COURT NOTICE REGARDING TRANSCRIPT OF FINAL PRETRIAL CONF. INTERNAL CORRESP REGARDING SAME.	0.2	\$106.00
1/7/2022	TJO	REVISE CERTIFICATION FOR REPLY PAPERS REGARDING MOTION IN LIMINE.	1.1	\$693.00
1/7/2022	MH	ATTEND TO COORDINATION OF LOGISTICS WITH PRIVATE INVESTIGATOR ON SERVICE OF MARANO AND ACCESS TO CONDO PROPERTY.	0.5	\$117.50
1/7/2022	MH	ATTEND TO REVIEW OF CASE LAW FOR OMNIBUS MOTION TO SEAL FINDINGS OF FACT.	1.2	\$282.00
1/10/2022	TJO	PARTICIPATE IN STEERING COMMITTEE MEETING VIA ZOOM (0.7); REVIEW AND COMMENT ON REPLY BRIEF REGARDING IN LIMINE MOTIONS (0.5).	1.2	\$756.00
1/11/2022	HDR	REVIEW CORRESPONDENCE REGARDING SERVICE OF TRIAL SUBPOENA ON C MARANO.	0.1	\$53.00
1/11/2022	TJO	REVIEW EMAIL FROM C. REISMAN REGARDING FOOTNOTE IN DRAFT OF REPLY BRIEF (0.1); RESPOND TO EMAIL (0.1); EXCHANGE MULTIPLE EMAILS WITH PARALEGAL (MH) REGARDING SERVICE OF SUBPOENA ON MARANO (0.2); DRAFT EMAIL TO CO-COUNSEL ADVISING SERVICE HAS BEEN EFFECUATED (0.1); EXCHANGE EMAILS WITH C. REISMAND AND J. RUE REGARDING LEGISLATION ESTABLISHING SPECIAL EDUCATION UNIT IN OAL AND IMPACT ON CLAIMS (0.2).	0.7	\$441.00
1/11/2022	MH	ATTEND TO MULTIPLE CALLS WITH DETECTIVE AGENCY AND ASSIGNED PRIVATE INVESTIGATOR ON LOGISTICS FOR SERVICE ON MARANO AND FOLLOW-UP WITH T. O'LEARY REGARDING THE SAME.	1.3	\$305.50
1/11/2022	MH	ATTEND TO OMNIBUS MOTION TO SEAL.	1.8	\$423.00
1/12/2022	TJO	REVIEW EMAIL FROM C. REISMAN AND FORWARD LATEST DRAFT OF RESPONSE TO STATE'S RULE 56.1 STATEMENT (0.1); ZOOM CONFERENCE WITH J. RUE (0.4); REVIEW STATE'S REPLY IN SUPPORT OF MOTON IN LIMINE (0.2); PARTICIPATE IN ZOOM CONFERENCE WITH STEERING COMMITTEE AND G. LITTLE (0.9); REVIEW C. REISMAN'S REVISIONS TO RULE 56.1 STATEMENT AND COMMENT ON SAME (0.4).	2.0	\$1,260.00
1/12/2022	GWB	CONTINUE TO REVIEW THE DEPOSITION TRANSCRIPT OF EHLING AND DRAFT DIGEST OF SAME.	1.3	\$578.50
1/12/2022	MH	ATTEND TO FOLLOW-UP CALL WITH PRIVATE INVESTIGATOR ON PROOF OF SERVICE.	0.2	\$47.00
1/13/2022	TJO	PARTICIPATE IN STATUS CONFERENCE WITH COURT (0.7); ZOOM CONFERENCE WITH CO-COUNSEL FOLLOWING STATUS CONFERENCE (0.6).	1.3	\$819.00
1/13/2022	TJO	REVIEW TEXT ORDER ENTERED BY THE COURT.	0.1	\$63.00

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1/13/2022	GWB	CONTINUE TO REVIEW THE DEPOSITION OF EHLING AND PREPARE DIGEST OF SAME.	4.2	\$1,869.00
1/14/2022	GWB	CONTINUE TO REVIEW THE DEPOSITION TRANSCRIPT OF EHLING AND DRAFT DIGEST OF SAME.	3.5	\$1,557.50
1/15/2022	TJO	REVIEW CORRESPONDENCE FROM E. HERLIHY TO COURT.	0.1	\$63.00
1/16/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE.	0.6	\$378.00
1/17/2022	GWB	CONTINUE TO REVIEW THE DEPOSITION TRANSCRIPT OF EHLING AND DRAFT DIGEST OF SAME.	4.3	\$1,913.50
1/18/2022	HDR	REVIEW CORRESPONDENCE REGARDING OMNIBUS MOTION TO SEAL. ATTEND TO CORRESPONDENCE TO THE COURT REGARDING MOTION TO SEAL. RECEIVE AND REVIEW MINUTES REGARDING 1/2022 PRETRAIL CONFERENCE WITH THE COURT.	0.4	\$212.00
1/18/2022	HDR	DEVELOP STRATEGY REGARDING OMNIBUS MOTION TO SEAL.	0.3	\$159.00
1/18/2022	TJO	REVIEW SECOND REVISED AGREEMENT BETWEEN PLAINTIFFS' COUNSEL AND EXECUTE SAME; EMAIL EXECUTED AGREEMENT TO CO-COUNSEL.	0.2	\$126.00
1/18/2022	GWB	CONTINUE TO REVIEW THE EHLING DEPOSITION TRANSCRIPT AND DRAFT DIGEST OF SAME.	1.1	\$489.50
1/18/2022	MH	DRAFT LETTER TO MAGISTRATE REGARDING OMNIBUS MOTION TO SEAL AND REDACTIONS DEADLINE.	0.9	\$211.50
1/19/2022	HDR	ATTEND TO CORRESPONDENCE TO THE COURT REGARDING OMNIBUS MOTION TO SEAL. CORRESPONDENCE WITH CO COUNSEL AND ADVERSARY REGARDING SAME.	0.3	\$159.00
1/19/2022	HDR	ATTEND TO CORRESPONDENCE REGARDING OMNIBUS MOTION TO SEAL. REVIEW COURT NOTICE REGARDING MOTION FOR EXCESSIVE PAGES.	0.3	\$159.00
1/19/2022	HDR	ATTEND TO CORRESPONDENCE TO THE COURT REGARDING OMNIBUS MOTION TO SEAL.	0.1	\$53.00
1/19/2022	TJO	REVIEW STATE'S OPPOSITION TO CLASS CERTIFICATION MOTION (0.8); ZOOM CONFERENCE WITH J. RUE (0.5); REVISE RESPONSE TO RULE 56.1 STATEMENT (2.4).	3.7	\$2,331.00
1/19/2022	MH	REVISE LETTER TO JUDGE SKAHILL REGARDING OMNIBUS MOTION TO SEAL AND REDACTIONS AND ELECTRONICALLY FILE THE SAME PER COMMENTS FROM COUNSEL.	0.4	\$94.00
1/19/2022	MH	ATTEND TO MOTIONS IN LIMINE REPLIES, NJDOE CORRESPONDENCE, ORDER, MOTION TO FILE EXCESS PAGES, AND OPPOSITION TO CLASS CERTIFICATION MOTION.	0.7	\$164.50

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1/20/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN REGARDING OPPOSITION TO STATE'S SUMMARY JUDGMENT MOTION (0.2); CONTINUE REVISING RULE 56.1 STATEMENT (1.7); TELEPHONE CONFERENCE WITH J. RUE REGARDING DOCUMENTS REGARDING SUBSTANTIATING DO ALLEGATIONS (0.1).	2.0	\$1,260.00
1/20/2022	MH	ATTEND TO REVIEW OF 56.1 STATEMENT/PRODUCTION DOCUMENTS, CALL WITH T. O'LEARY AND EMAILS WITH PLAINTIFFS' TEAM REGARDING THE SAME.	2.7	\$634.50
1/21/2022	TJO	ZOOM CONFERENCE WITH J. RUE REGARDING DIVISION OF TRIAL RESPONSIBILITIES (0.3); CONTINUE REVISING AND FINALIZING RESPONSE TO RULE 56.1 STATEMENT (6.1).	6.4	\$4,032.00
1/21/2022	MH	FURTHER REVIEW OF PLAINTIFFS' PRODUCTION DOCUMENTS/DRAFT SUMMARY JUDGMENT SUBMISSIONS, CALL WITH D. SOUTAR AND ATTEND TO FOLLOW-UP EMAILS REGARDING THE SAME.	1.8	\$423.00
1/23/2022	TJO	DRAFT SUPPLEMENTAL CERTIFICATIONS FOR T. O'LEARY AND J. RUE (0.8); CONTINUE REVISING AN FINALIZING RESPONSE TO STATE'S RULE 56.1 STATEMENT (1.8); REVISE OPPOSITION BRIEF (2.4).	5.0	\$3,150.00
1/24/2022	HDR	RECEIVE/REVIEW LETTER ORDER REGARDING RE OMNIBUS MOTION TO SEAL.	0.1	\$53.00
1/24/2022	TJO	PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL (0.9); REVISE AND FINALIZE BRIEF IN OPPOSITION TO STATE'S SUMMARY JUDGMENT MOTION (2.9); REVIEW REPLY BRIEFS FOR CLASS CERTIFICATION MOTIONS PRIOR TO FILING (1.2).	5.0	\$3,150.00
1/24/2022	MH	REVISE RESPONSIVE 56.1 STATEMENT, REVIEW, FINALIZE, AND ELECTRONICALLY FILE OPPOSITION TO NJDOE MOTION FOR SUMMARY JUDGMENT AND SUPPORTING PAPERS.	6.2	\$1,457.00
1/25/2022	HDR	REVIEW/ANALYZE REPLIES REGARDING CLASS CERT MOTION.	0.6	\$318.00
1/25/2022	TJO	REVIEW STATE'S OPPOSITION TO SUMMARY JUDGMENT MOTION AND RESPONSES TO RULE 56.1 STATEMENT (1.0); EMAL C. REISMAN AND J. RUE REGARDING ARGUMENTS FOR REPLY BRIEF (0.4).	1.4	\$882.00
1/25/2022	MH	REVISE/ELECTRONICALLY FILE REPLY BRIEFS IN FURTHER SUPPORT OF RULE 23(B) MOTIONS FOR CLASS CERTIFICATION.	1.2	\$282.00
1/25/2022	MH	ATTEND TO ORDER EXTENDING DEADLINE TO FILE OMNIBUS MOTION TO SEAL.	0.1	\$23.50
1/25/2022	MH	ATTEND TO ORDER, OPPOSITION TO SANCTIONS MOTION.	0.2	\$47.00
1/26/2022	HDR	RECEIVE/REVIEW COVER LETTER TO COURT ENCL MOTION PAPERS FILED 1-25-2022.	0.1	\$53.00

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Date	Person	Description of Services	Hours	Amount
1/26/2022	TJO	REVIEW EMAIL FROM J. RUE REGARDING PRELIMINARY STATEMENT FOR REPLY BRIEF ON S/J MOTION (0.1); DRAFT RESPONSIVE EMAIL (0.3); REVIEW EMAIL FROM J. RUE REGARDING OUTLINING THOUGHTS ON STRONGEST POINTS IN STATE'S OPPOSITION BRIEF AND DRAFT RESPONSIVE EMAIL COMMENTING ON SAME (0.3); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING EVIDENTIARY ISSUE RAISED IN STATE'S OPPOSITION BRIEF (0.2); ZOOM CONFERENCE WITH C. REISMAN, J. RUE, AND G. LITTLE REGARDING REPLY BRIEF FOR S/J MOTION (0.7); REVIEW ROTA DEP EXHIBITS AND TRANSCRIPTS AND FORWARD OLS DISCUSSION POINTS TO C. REISMAN FOR INCLUSION IN REPLY BRIEF (0.3); REVIEW AND COMMENT ON DRAFT OF REPLY BRIEF (1.4).	3.3	\$2,079.00
1/26/2022	MH	DRAFT LETTER TO JUDGE HILLMAN REGARDING SUMMARY JUDGMENT OPPOSITION/CLASS CERTIFICATION REPLIES, ATTEND TO CALL WITH CHAMBERS ON COURTESY COPIES AND LOGISTICS FOR THE SAME PER JUDGE'S REQUEST.	1.1	\$258.50
1/27/2022	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND (0.1); RESEARCH TO LOCATE BILL SIGNED BY GOVERNOR ESTABLISHING SPECIAL EDUCATION UNIT (0.8).	0.9	\$567.00
1/28/2022	TJO	REVIEW AND COMMENT ON REPLY BRIEF IN FURTHER SUPPORT OF SUMMARY JUDGMENT MOTION (0.9); PARTICPATE IN ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING TRIAL STRATEGY (1.4).	2.3	\$1,449.00
1/28/2022	MH	ATTEND TO ORDER, NJDOE OPPOSITION TO SJ MOTION, AND CORRESPONDENCE,.	0.4	\$94.00
1/29/2022	HDR	RECEIVE AND REVIEW REPLY TO SANCTIONS MOTION AND PRETRIAL BRIEF FILED BY PLTFF.	0.1	\$53.00
1/29/2022	TJO	REVIEW EMAIL FROM J. RUE REGARDING PARENT ATTORNEYS' POTENTIALLY TESTIFYING AT TRIAL AND RESPOND.	0.2	\$126.00
1/30/2022	TJO	REVIEW REVISED BRIEF AND COMMENT ON SAME.	0.2	\$126.00
1/31/2022	TJO	ATTEND STEERING COMMITTEE MEETING (1.5); DOWNLOAD AND REVIEW FINAL FILED PROPOSED PRETRIAL ORDER (0.2); REVIEW EMAIL FROM COURT (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING COPYING OF TRIAL EXHIBITS (0.1); ZOOM CONFERENCE WITH J. RUE (0.4); REVIEW AND REVIEW REPLY BRIEF (1.2).	3.5	\$2,205.00
1/31/2022	GWB	CONTINUE TO REVIEW THE EHLING DEPOSITION TRANSCRIPT AND DRAFT DIGEST OF SAME.	2.4	\$1,068.00
1/31/2022	MH	ATTEND TO REVIEW OF DISCOVERY RESPONSES/PRODUCTION DOCUMENTS, DRAFT SUMMARY AND FORWARD TO TEAM PER REQUEST.	1.8	\$423.00

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2/1/2022	TJO	TELEPHONE CONFERENE WITH PARALEGAL (MH) REGARDING PRINTING AND PREPARATION OF TRIAL EXHIBITS (0.2); REVIEW EMAIL FROM D. GILES REGARDING MILLIGAN DISCOVERY (0.1); FORWARD MILLIGAN DISCOVERY TO D. GILES (0.2); EXCHANGE EMAILS WITH D. GILES REGARDING MILLIGAN'S FAILURE TO RESPOND TO EMAILS (0.2); REVIEW AND COMMENT ON OAL FORM OF ORDER FORWARDED BY C. REISMAN (0.2); REVIEW EMAILS EXCHANGED BY D. DWYER AND G. LITTLE REGARDING WITNESS ORDER (0.1); ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING NEW OAL FORM OF ORDER (0.3); REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING AVAILABILITY FOR SETTLEMENT DISCUSSIONS WTH DAG'S OFFICE (0.1); CONFERENCE WITH D. SOUTAR AND C. REISMAN REGARDING TRIAL EXHIBITS AND OUTLINES OF DIRECT EXAMINATION (0.9); REVIEW REPLY BRIEFS FILED BY PAINTIFFS AND DEFENDANTS (0.7).	3.0	\$1,890.00
2/1/2022	MH	ATTEND TO CALL WITH PLAINTIFFS' TEAM REGARDING TRIAL PREPARATION AND LOGISTICS.	0.3	\$70.50
2/1/2022	MH	ATTEND TO JOINT AND PLAINTIFFS' TRIAL EXHIBITS' BINDERS PER T. O'LEARY REQUEST.	1.2	\$282.00
2/1/2022	MH	ATTEND TO REVIEW OF ELECTRONIC FILE AND PULL DEFENDANTS' TRIAL EXHIBITS PER TEAM REQUEST.	2.5	\$587.50
2/2/2022	TJO	ZOOM CONFERENCE WITH G. LITTLE AND C. REISMAN REGARDING CP INDIVIDUAL CASE AND OTHER PLAINTIFFS TO DROP FROM SUIT (1.2); DRAFT MEMO TO G. LITTLE, J. RUE AND C. REISMAN REGARDING STRENGTHS OF PLAINTIFF WITNESSES (0.3); BEGIN DRAFTING MEMO TO G. LITTLE, J. RUE AND C. REISMAN REGARDING DIGEST OF DEPOSITION TESTMONY OF EHLING AND ROTA AND KEY POINTS TO BRING OUT AT TRIAL (7.6).	9.1	\$5,733.00
2/2/2022	MH	DRAFT LETTER TO JUDGE HILLMAN REGARDING REPLY IN SUPPORT OF SJ MOTION AND DRAFT EMAIL TO ALL COUNSEL ON THE SAME.	0.2	\$47.00
2/2/2022	MH	ATTEND TO REVIEW OF ELECTRONIC FILE AND PULL DEFENDANTS' TRIAL EXHIBITS PER TEAM REQUEST.	1.8	\$423.00
2/3/2022	HDR	ATTEND TO PRO HAC VICE MOTION REGARDING G LITTLE. RECEIVE AND REVIEW NOTICES IN LIEU SERVED BY DEFS.	0.3	\$159.00
2/3/2022	HDR	CORRESP WITH M. HOGAN REGARDING OMNIBUS MOTION TO SEAL.	0.1	\$53.00

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2/3/2022	TJO	CONTINUE DRAFTING MEMO TO G. LITTLE REGARDING DEPOSITIONS OF STATE'S WITNESSES (1.3); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING PARALEGAL SUPPORT (0.2); EXCHANGE EMAILS WITH G. LITTLE REGARDING SCHEDULING CONFERENCE CALL (0.1); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING TRIAL STRATEGY (0.5); EXCHANGE EMAILS WITH G. LITTLE REGARDING PRO HAC MOTION (0.1); EMAIL PARTNER (HDR) REGARDING SAME (0.1); REVIEW SUBPOENAS ISSUED BY STATE (0.1); REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING SUBPOENAS TO SCHOOL BOARD ATTORNEYS (0.2).	2.6	\$1,638.00
2/3/2022	MH	ATTEND TO DEFENDANTS' TRIAL EXHIBITS BREAKDOWN, RENAMING OF THE SAME AND CREATE FTP TO CIRCULATE TO TEAM.	2.2	\$517.00
2/3/2022	MH	DRAFT PAPERS IN SUPPORT OF G. LITTLE PHV ADMISSION AND ATTEND TO EMAILS REGARDING THE SAME.	0.6	\$141.00
2/4/2022	HDR	PREPARE MOTION FOR PRO HAC VICE ADMISSION REGARDING G. LITTLE. CORRESP. WITH C. LABIN REGARDING SAME.	0.4	\$212.00
2/4/2022	HDR	CORRESP WITH M. HOGAN REGARDING OMNIBUS MOTION TO SEAL. ATTEND TO MOTION FOR PHV ADMISSION OF G. LITTLE.	0.3	\$159.00
2/4/2022	HDR	ATTEND TO PRO HAC VICE MOTION REGARDING G, LITTLE.	0.5	\$265.00
2/4/2022	TJO	ZOOM CONFERENCE WITH ALL PLAINTIFFS' COUNSEL REGARDING TRIAL PREP (1.0); ZOOM CONFERENCE WITH J. RUE AND C. REISMAN REGARDING TRIAL PREP (1.1); SECOND ZOOM CONFERENCE WITH J. RUE AND C. REISMAN REGARDING TRIAL PREP (0.5); PREPARE TIMELINE FOR E.M. CASE (4.8).	7.4	\$4,662.00
2/5/2022	TJO	DRAFT TIMELINES FOR A.S., M.S., MM. AND L.G. CASES.	7.4	\$4,662.00
2/6/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE.	0.1	\$63.00
2/7/2022	HDR	ATTEND TO OMNIBUS MOTION TO SEAL. CORRESP WITH M, HOGAN TO DEVELOP STRAETGY REGARDING OMNIBUS MOTION TO SEAL.	0.3	\$159.00
2/7/2022	HDR	EDIT AND REVISE PRO HAC VICE MOTION REGARDING G. LITTLE. CORRES. WITH CO COUNSEL (J, RUE) REGARDING SAME.	0.4	\$212.00
2/7/2022	HDR	REVIEW CORRESPONDENCE REGARDING PHV ADMISSION OF G. LITTLE AND TRIAL ISSUES.	0.2	\$106.00
2/7/2022	HDR	ATTEND TO PRO HAC MOTION REGARDING G, LITTLE.	0.1	\$53.00

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2/7/2022	TJO	EMAIL CO-COUNSEL REGARDING DEMONSTRATIVE FOR OPENING STATEMENTS (0.1); REVIEW EMAIL FROM C. LABIN REGARDING OBJECTING TO G. LITTLE APPEARING PRO HAC VICE (0.1); REVIEW PROPOSED FINDINGS OF FACT PREPARED BY C. REISMAN (0.2).	0.8	\$504.00
2/7/2022	MH	REVIEW OF DRAFT MOTION TO SEAL, REVISE THE SAME, DRAFT MEMO TO TEAM IN PREPARATION FOR CALL WITH DEFENDANTS' COUNSEL, ATTEND TO TEAM EMAILS REGARDING MOTION TO SEAL AND TRIAL LOGISTICS.	2.7	\$634.50
2/8/2022	HDR	ATTEND TO OMNIBUS MOTION TO SEAL. TELCON WITH M, HOGAN REGARDING SAME. TELCON WITH COUNSEL FOR NJDOE AND C. REISMAN REGARDING MOTION TO SEAL. PREPARE CORRESP TO THE COURT SEEKING EXT OF TIME FOR OMNIBUS MOTION TO SEAL. RECEIVE AND REVIEW FINAL PRETRIAL ORDER ENTERED BY COURT.	1.0	\$530.00
2/8/2022	HDR	ATTEND TO CORRESP TO COURT REGARDING PRETRIAL CONF. CORRESP W. CO-COUNSEL REGARDING SAME. RECEIVE AND REVIEW LETTER FILED WITH COURT REGARDING PRETRIAL LOGISTICS CONF.	0.3	\$159.00
2/8/2022	HDR	CORRESP WITH ADVERSARY REGARDING MOTION TO SEAL. ATTEND TO CORRESP TO THE COURT REGARDING MOTION TO SEAL.	0.4	\$212.00
2/8/2022	TJO	EXCHANGE EMAILS WITH G. GILES REGARDING M. MILLIGAN'S APPEARANCE AT TRIAL (0.1); EMAIL CO-COUNSEL REGARDING SAME (0.1).	0.2	\$126.00
2/8/2022	MH	CALL WITH H. RUIZ AND CONF CALL WITH PLAINTIFFS AND DEFENDANTS' TEAM ON MOTION TO SEAL AND TRIAL LOGISTICS, ATTEND TO EMAILS WITH PLAINTIFFS' TEAM ON PLAINTIFFS' CONFIDENTIAL INFORMATION, DRAFT LIST OF INFORMATION PLAINTIFFS' DEEM CONFIDENTIAL, FORWARD TO DEFENDANTS FOR REVIEW AND COMMENT, AND ATTEND TO TRIAL BINDERS.	4.0	\$940.00
2/9/2022	HDR	ATTEND TO CORRESP TO THE COURT REGARDING MOTION TO SEAL. ATTEND TO FINDINGS OF FACT ISO MOTION TO SEAL.	1.0	\$530.00
2/9/2022	HDR	CONDUCT MOTION TO SEAL RESEARCH REGARDING SEALING SENSITIVE MATERIALS.	1.0	\$530.00
2/9/2022	TJO	ZOOM CONFERENCE WITH J. RUE AND C. REISMAN REGARDING TRIAL PREP (0.7); REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL (0.1).	0.8	\$504.00
2/9/2022	MH	REVISE LETTER TO COURT REGARDING OMNIBUS MOTION TO SEAL; ATTEND TO EMAILS WITH NJDOE AND C. REISMAN ON TRIAL LOGISTICS; ATTEND TO TRIAL EXHIBIT BINDERS.	2.1	\$493.50
2/9/2022	MH	ATTEND TO TRIAL SUBPOENAS ISSUED BY NJDOE, CORRESPONDENCE, REPLY PAPERS, ORDER, G. LITTLE PHV MOTION.	0.8	\$188.00

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2/10/2022	HDR	REVIEW CORRESPONDENCE WITH ADVERSARY REGARDING TRIAL EXHIBITS.	0.1	\$53.00
2/10/2022	TJO	REVIEW JOINT AND PLAINTIFF'S EXHIBIT BINDERS BEFORE FORWARDING TO COURT (0.4); DRAFT LETTER TO JUDGE HILLMAN REGARDING FORWARDING BINDERS (0.1); EMAIL C. REISMAN REGARDING MISSING BROADCAST MEMO FROM EXHIBITS (0.1); EXCHANGE EMAILS WITH C. REISMAN AND J. RUE REGARDING SUPPLEMENTATION OF EXHIBITS WITH BROADCAST MEMO (0.2); EMAIL C. LABIN REGARDING NOTICES IN LIEU OF SUBPOENA (0.1); EMAIL CO-COUNSEL REGARDING NEED TO SUBPOENA STATE WITNESSES (0.2.); CONFER WITH PARALEGAL (MH) REGARDING PREPARATION AND SERVICE OF SUBPOENAS ON STATE ROTA, ANTHONY, AND EHLING (0.2); PREPARE MEMO FOR CO-COUNSEL REGARDING BEST AND WORST POINTS OF ROTA AND EHLING DEPOSITION TESTMONY AND BEST AND WORST DOCUMENTS (7.0).	8.2	\$5,166.00
2/10/2022	MH	ATTEND TO CALLS WITH T. O'LEARY ON EHLING, ROTA, AND ANTHONY, CONDUCT LEXIS SEARCHES FOR VALID HOME ADDRESSES AND VERIFY THE SAME, DRAFT NOTICES, TRIAL SUBPOENAS AND LETTERS REGARDING APPEARANCE AT TRIAL.	3.3	\$775.50
2/11/2022	HDR	CORRESP WITH J. RUE REGARDING TRIAL CONTACT SHEET. RECEIVE/REVIEW CORRESP FROM J. RUE TO COURT.	0.2	\$106.00
2/11/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE (0.4); SECOND CALL WITH J. RUE (0.2); REVIEW EMAIL FROM L. FICHERA REGARDING TRIAL SUBPOENAS (0.1); REVIEW EMAIL FROM C. LABIN REGARDING SAME (0.1); EMAIL C. REISMAN REGARDING MISSING EXHIBIT (0.2); CONITNUE PREPARING FOR TRIAL (4.2).	5.2	\$3,276.00
2/11/2022	MH	REVISE INDEX OF PLAINTIFFS' TRIAL EXHIBITS, REPLACE INCORRECT TRIAL EXHIBITS, ATTEND TO PREPARATION FOR FINAL PRETRIAL CONFERENCE PER PLAINTIFFS' TEAM REQUEST AND EMAIL REGARDING THE SAME.	1.8	\$423.00
2/11/2022	MH	ATTEND TO LETTERS TO COURT, ORDER.	0.3	\$70.50
2/11/2022	MH	ATTEND TO REVIEW OF CONFIDENTIAL SUBMISSIONS AND REDACT THE SAME.	2.6	\$611.00
2/12/2022	TJO	DIGEST BASS DEPOSITION AND PREPARE MEMO HIGHLIGHTING BEST AND WORST ASPECTS OF EXPECTED TESIMONY AND BEST AND WORST EXHIBITS FOR BASS (1.3); DRAFT MEMO HIGHLIGHTING BEST AND WORST ASPECTS E.M TESTIMONY AND BEST AND WORST EXHIBITS (0.8).	2.1	\$1,323.00
2/13/2022	TJO	ZOOM CONFERENCE WITH J. RUE (0.3); ZOOM CONFERENCE WITH CO-COUSNEL (0.7).	1.0	\$630.00

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2/14/2022	HDR	CORRESP WITH C. LABIN REGARDING CORRESP TO COURT REGARDING OMNIBUS MOTION TO SEAL. RECEIVE AND REVIEW TEXT ORDERS FROM THE COURT REGARDING TRIAL.	0.2	\$106.00
2/14/2022	HDR	RECEIVE AND REVIEW ORDER OF COURT REGARDING COURT CONF.	0.1	\$53.00
2/14/2022	TJO	TRAVEL TO AND FROM C. REISMAN'S OFFICE (3.2); MEET WITH CO-COUNSEL REGARDING TRIAL PREPARATION (3.4).	6.6	\$4,158.00
2/14/2022	MH	ATTEND TO TRIAL EXHIBITS, REVISE INDEX AND ATTEND TO PLAINTIFFS' TEAM EMAILS.	0.4	\$94.00
2/14/2022	MH	ATTEND TO ORDER ADJOURNING CONFERENCE AND TRIAL AND LETTERS TO JUDGE.	0.3	\$70.50
2/14/2022	MH	REVISE AND ELECTRONICALLY FILE LETTER TO MAGISTRATE REGARDING JOINT OMNIBUS MOTION TO SEAL AND ATTEND TO EMAILS REGARDING THE SAME.	0.6	\$141.00
2/14/2022	MH	REVIEW CASE LAW, REVISE FINDINGS OF FACT IN SUPPORT OF OMNIBUS MOTION TO SEAL AND ATTEND TO FURTHER REVIEW OF CONFIDENTIAL SUBMISSIONS AND APPLY REDACTIONS.	2.1	\$493.50
2/15/2022	HDR	RECEIVE AND REVIEW ORDER OF COURT REGARDING TIME TO FILE OMNIBUS MOTION TO SEAL.	0.1	\$53.00
2/15/2022	TJO	ZOOM CONFERENCE WITH J. RUE, C. REISMAN AND G. LITTLE REGARDING PREPARATION FOR CONFERENCE WITH STATE (0.7); EXCHANGE MULTIPLE EMAILS WITH C. LABIN REGARDING LITTLE'S PARTICIPATION IN CONFERENCE (0.2); TELEPHONE CONFERENCE WITH C. LABIN REGARDING STREAMLINING THE TRIAL (0.3); TELEPHONE CONFERENCE WITH C. REISMAN, J. RUE AND G. LITTLE REGARDING CALL WITH LABIN (0.3); BEGIN REVIEWING AND EDITING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (2.1).	3.6	\$2,268.00
2/16/2022	HDR	CORRESP WITH TEAM REGARDING FORMAT OF 2/22/22 PRETRIAL CONF.	0.1	\$53.00
2/16/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE (0.1); DRAFT EMAIL TO C. LABIN REGARDING STREAMLINING TRIAL (0.1); REVIEW RESPONSIVE EMAIL FROM C. LABIN (0.1); DRAFT RESPONSIVE EMAIL TO LABIN REGARDING RESPONDING TO QUESTIONS REGARDING STREAMLINING THE TRIAL (0.2); EMAIL ALL COUNSEL ADVISING PRETRIAL CONFERENCE WILL BE ALL VIRTUAL (0.1); CONTINUE REVIEWING AND REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (2.7).	3.2	\$2,016.00
2/16/2022	MH	ATTEND TO CALL WITH JUDGE HILLMAN'S CHAMBERS REGARDING FINAL PRETRIAL CONFERENCE/TRIAL AND FOLLOW-UP WITH T. O'LEARY ON THE SAME.	0.5	\$117.50
2/16/2022	MH	ATTEND TO ORDERS AND CORRESPONDENCE TO COURT.	0.4	\$94.00

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2/17/2022	TJO	REVIEW EMAIL FROM C. LABIN AND RESPOND (0.1); TELEPHONE CONFERENCE WITH C. LABIN (0.2); ZOOM CONFERENCE WITH G. LITTLE, C. REISMAN AND J. RUE REGARDING CALL WITH LABIN (0.4); DRAFT EMAIL TO C. LABIN REGARDING AGREEMENT TO DISMISS FOUR PLAINTIFFS FROM ACTION (0.2); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING DISMISSAL OF PLAINTIFFS (0.3); CONFERENCE WITH G. LITTLE AND C. REISMAN REGARDING SAME (0.5); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1); DRAFT JOINT LETTER TO JUDGE HLLMAN (0.2); EMAIL C. LABIN REGARDING FORWARDING JOINT LETTER (0.1); REVIEW EMAIL FROM C. LABIN REGARDING APPROVING JOINT LETTER (0.1); EMAIL PARALEGAL REGARDING DIRECTION TO FILE JOINT LETTER (0.1); CONTINUE REVISING PROPOSED FINDINGS OF FACT (2.6).	4.9	\$3,087.00
2/18/2022	HDR	RECEIVE AND REVIEW COURT NOTICE REGARDING PRETRIAL CONF.	0.1	\$53.00
2/18/2022	TJO	REVIEW EMAIL FROM C. LABIN (0.1); REVIEW ORDER FROM COURT REGARDING RESCHEDULING CONFERENCE (0.1); ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING PREPARATION FOR CONFERENCE AND LITIGATION STRATEGY (1.5); CONTINUE REVIEWING/REVISING PROPOSED FINDINGS OF FACT (5.4).	7.1	\$4,473.00
2/18/2022	MH	REVISE LETTER TO JUDGE REGARDING FINAL PRETRIAL CONFERENCE AND ELECTRONICALLY FILE THE SAME.	0.4	\$94.00
2/18/2022	MH	ATTEND TO ORDER RESCHEDULING FINAL PRETRIAL CONFERENCE.	0.1	\$23.50
2/19/2022	TJO	CONTINUE REVIEWING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (1.6); EXCHANGE MULTIPLE EMAILS WITH J. RUE REGARDING WITHDRAWAL OF 4 PLAINTIFFS' CLAIMS (0.2).	1.8	\$1,134.00
2/21/2022	HDR	RECEIVE AND REVIEW DOE OPPOSITION TO PLTFFS MOTION FOR PRO HAC VICE ADMISSION OF G LITTLE.	0.1	\$53.00
2/21/2022	TJO	PARTICIPATE IN ZOOM CONFERENCE WITH G. LITTLE, J. RUE AND C. REISMAN REGARDING PREPARATION FOR PRE-TRIAL CONFERENCE (0.9); REVIEW OPPOSTION TO PRO HAC MOTION (0.2); CONTINUE REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (2.9).	4.0	\$2,520.00
2/22/2022	TJO	CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING PREPARATION FOR CONFERENCE WITH COURT (1.6); CONFERENCE WITH ALL CO-COUNSEL REGARDING SAME (0.8); PARTICIPATE IN CONFERENCE WITH COURT (1.0); PARTICIPATE IN ZOOM CONFERENCE WITH CO-COUNSEL AFTER CONFERENCE WITH COURT (0.4); EMAIL C. LABIN REGARDING SCHEDULING CALL (0.1); CONTINUE REVIEWING AND REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (1.1).	5.0	\$3,150.00

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Date	Person	Description of Services	Hours	Amount
2/22/2022	MH	ATTEND TO CALL WITH LAW CLERK AND DEPUTY REGARDING FINAL PRETRIAL CONFERENCE.	0.2	\$47.00
2/23/2022	TJO	TELEPHONE CONFERENCE WITH C. LABIN (0.3); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING CALL WITH LABIN AND NOTICE REQUIREMENTS REGARDING 23(B)(3) CLASS (0.4); TELEPHONE CONFERENCE WITH J. RUE (0.2); SECOND TELEPHONE CONFERENCE WITH C. REISMAN REGARDING 23(B)(3) CLASS (0.1); REVIEW EMAIL FROM J. RUE REGARDING 23(B)(3) CLASS AND RESPOND (0.2); CONTINUE REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (3.7).	4.9	\$3,087.00
2/24/2022	TJO	CONTINUE REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (0.2); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING (B)(3) CLASS (0.2); ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING SAME (0.8).	1.2	\$756.00
2/25/2022	TJO	REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL AND C. LABIN (0.1); EMAIL J. RUE, G. LITTLE, AND C. REISMAN REGARDING TIMING OF WHEN TO FILE LETTER WITH COURT (0.1).	0.2	\$126.00
2/26/2022	HDR	RECEIVE/REVIEW CORRESP TO THE COURT ENCL PLTFFS MOTION FILINGS.	0.1	\$53.00
2/27/2022	HDR	RECEIVE AND REVIEW REPLY IN SUPP OF G. LITTLE PRO HAC MOTION.	0.1	\$53.00
2/28/2022	HDR	RECEIVE AND REVIEW CORRESP FROM J, RUE TO THE COURT REGARDING DISCOVERY ISSUES.	0.1	\$53.00
2/28/2022	TJO	ZOOM CONFERENCE WITH G. LITTLE, C. REISMAN, AND J. RUE REGARDING TRIAL PREPARATION (0.7); REVIEW CORRESPONDENCE FROM J. RUE FILED WITH COURT (0.1).	0.8	\$504.00
3/1/2022	TJO	REVIEW ORDER FROM COURT REGARDING PRO HAC MOTION (0.1); EMAIL CO-COUNSEL REGARDING REQUEST TO RESCHEDULE CONFERENCE CALL (0.1).	0.2	\$126.00
3/1/2022	MH	ATTEND TO LITTLE PHV ORDER.	0.1	\$23.50
3/2/2022	HDR	TELECONFERENCE WITH T. OLEARY REGARDING TRIAL MATTERS.	0.1	\$53.00
3/2/2022	TJO	REVIEW MINUTE ENTRY ENTERED BY COURT (0.1); REVIEW TEXT ORDER ENTERED BY COURT (0.1); EXCHANGE MULTIPLE EMAILS WITH J. RUE REGARDING STATE'S DESIRE TO CALL PARENT ATTORNEYS AS WITNESSES AT TRIAL (0.6); PERFORM LEGAL RESEARCH REGARDING IMPLICATIONS ON STANDING WHEN NAMED PLAINTIFFS NO LONGER HAVE ACTIVE DP PETITIONS (2.2); CONTINUE REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (0.7).	3.7	\$2,331.00

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3/2/2022	MH	ATTEND TO ORDER REGARDING ADJOURNMENT OF TRIAL AND SETTING ORAL ARGUMENT AND LETTER REGARDING SUPPLEMENTAL DISCOVERY.	0.2	\$47.00
3/2/2022	MH	ATTEND TO EMAILS WITH TEAM REGARDING REQUIREMENTS FOR G. LITTLE PHV ADMISSION, DRAFT AND ELECTRONICALLY FILE NOTICE OF REQUEST FOR G. LITTLE TO RECEIVE ELECTRONIC FILINGS, DRAFT LETTER TO NJ LAWYERS' FUND, COMPLETE PHV FORM.	2.2	\$517.00
3/3/2022	HDR	RECEIVE AND REVIEW COURT NOTICE REGARDING PHV ADMISSION OF G. LITTLE FOR PLTFFS.	0.1	\$53.00
3/3/2022	HDR	REVIEW CORRESP FROM L. FICHERA TO COURT REGARDING HEARING.	0.1	\$53.00
3/3/2022	TJO	ZOOM CONFERENCE WITH J. RUE (0.3); CONTINUE REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (5.1).	5.4	\$3,402.00
3/4/2022	TJO	ZOOM CONFERENCE WITH CO-COUNSEL (1.3); BEGIN PREPARING FOR ORAL ARGUMENT ON APPEAL OF JUDGE WILLIAMS' DECISION (4.4).	5.7	\$3,591.00
3/4/2022	TJO	REVIEW DRAFT OF LETTER PREPARED BY J. RUE (0.1); EMAIL CO-COUNSEL REGARDING CONCERNS ABOUT CONTENT OF LETTER (0.2).	0.3	\$189.00
3/6/2022	TJO	CONTINUE PREPARING FOR ORAL ARGUMENT ON APPEAL FROM JUDGE WILLIAMS' DECISION.	0.4	\$252.00
3/7/2022	TJO	ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING CONFERENCE WITH JUDGE WILLMANS (0.9); CONTINUE PREPARING FOR ORAL ARGUMENT ON APPEAL FROM JUDGE WILLIAMS' DECISION (2.9) AND ARGUMENT ON SUMMARY JUDGMENT MOTIONS (3.0).	6.8	\$4,284.00
3/8/2022	HDR	RECEIVE AND REVIEW TEXT ORDER OF THE COURT REGARDING SUPPLEMENTAL DEPOSITIONS.	0.1	\$53.00
3/8/2022	TJO	CONTINUE PREPARING FOR ORAL ARGUMENT (0.4); ATTEND CONFERENCE WITH JUDGE HILLMAN AND ARGUE MOTION (2.4); POST ARGUMENT CONFERENCE WITH CO-COUNSEL (0.4); DRAFT LETTER TO JUDGE HILLMAN REGARDING WITHDRAWING PORTION OF APPEAL RELATING TO DELIBERATIVE PROCESS PRIVILEGE ISSUE AND ADDRESSING NEED FOR SUPPLEMENTAL DISCOVERY (1.1); ZOOM CONFERENCE WITH STEERING COMMITTEE REGARDING STRATEGY FOR DELIBERATIVE PROCESS PRIVILEGE ISSUE AND LETTER TO JUDGE HILLMAN (0.4); CONTINUE REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (0.9).	5.6	\$3,528.00
3/8/2022	MH	ATTEND TO LETTER FROM DEFENDANTS TO COURT.	0.1	\$23.50
3/8/2022	MH	ATTEND TO REDACTIONS REGARDING OMNIBUS MOTION TO SEAL.	2.5	\$587.50

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3/9/2022	MH	ATTEND TO ORDER ADJOURNING TRIAL AND SETTING DEADLINES FOR SUBMISSIONS ON DEPOS.	0.1	\$23.50
3/10/2022	TJO	PARTICIPATE IN CONFERENCE CALL WITH STEERING COMMITTEE (0.8); REVIEW AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN REGARDING ADDITIONAL SUPPLEMENTAL DISCOVERY (0.6).	1.4	\$882.00
3/11/2022	HDR	RECEIVE AND REVIEW CORRESP FILED BY NJDOE RESPONDING TO PLTFF'S 3/10/22 LETTER REGARDING DEPOSITIONS.	0.1	\$53.00
3/11/2022	MH	ATTEND TO EMAILS WITH TEAM REGARDING JUDGES PREFERENCES.	0.1	\$23.50
3/13/2022	TJO	EXCHANGE EMAILS WITH J. RUE REGARDING FILING OF MOTION TO ESTABLISH END DATE FOR PURPOSES OF TRIAL (0.2); PARTICPATE IN TELEPHONE CONFERENCE REGARDING SAME (0.1).	0.3	\$189.00
3/15/2022	HDR	REVIEW PRO HAC MOTION FILED BY P. MEYERS ON BEHALF OF NJDOE.	0.1	\$53.00
3/15/2022	TJO	REVIEW CORRESPONDENCE FROM J. RUE TO JUDGE HILLMAN REGARDING SUPPLEMENTAL DISCOVERY (0.1); REVIEW CORRESPONDENCE FROM C. LABIN TO JUDGE HILLMAN REGARDING SAME AND REVIEW RUE RESPONSE TO LABIN LETTER (0.1).	0.2	\$126.00
3/16/2022	TJO	REVIEW DECISION AND ORDER ISSUED BY JUDGE HILLMAN (0.3); EXCHANGE EMAILS WITH J. RUE REGARDING SCOPE OF PERMISSIBLE SUPPLEMENTAL DISCOVERY (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SAME (0.2); FORWARD PRIOR 30(B)(6) NOTICE TO J. RUE (0.1).	0.7	\$441.00
3/17/2022	TJO	EXCHANGE EMALS WITH CO-COUNSEL REGARDING SCHEDULNG ZOOM CONFERENCE (0.1); ZOOM CONFERENCE WITH STEERING COMMITTEE TO DISCUSS SUPPLEMENTARY DEPOSITIONS (0.5); BEGIN REVISING/DRAFTING SUPPLEMENTARY RULE 30(B)(6) NOTICE TO NJDOE (1.1).	1.7	\$1,071.00
3/18/2022	TJO	REVISE RULE 30(B)(6) NOTICE FOR NJDOE.	6.2	\$3,906.00
3/21/2022	TJO	PARTICIPATE IN ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING SUPPLEMENTAL DISCOVERY (0.3); REVISE RULE 30(B)(6) NOTICE TO NJDOE (3.1).	3.4	\$2,142.00
3/22/2022	TJO	FINALIZE DEPOSITION NOTICES FOR ROTA, EHLING, RULE 30(B)(6) DESIGNEE OF NJDOE AND DRAFT LETTER TO C. LABIN REGARDING DEPOSITIONS.	1.5	\$945.00
3/23/2022	HDR	MTG W/ T. OLEARY TO DISCUSS SUPPLEMENTAL DEPOSITIONS.	0.1	\$53.00

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3/23/2022	TJO	DRAFT RULE 30(B)(6) NOTICE FOR OAL (2.3); DRAFT SUBPOENAS FOR JUDGES BASS AND MOSCOWITZ (0.3); DRAFT TRANSMITTAL LETTER TO L. FICHERA (0.2); DRAFT NOTICES OF INTENT TO ISSUE THREE SUBPOENAS (0.3); DRAFT LETTER TO C. LABIN REGARDING OAL SUBPOENAS (0.2); EMAIL J. RUE AND G. LITTLE REQUESTING THAT G. LITTLE TAKE SOME OF UPCOMING DEPOSITIONS (0.1); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SPLITTING OF DEPOSITIONS OF WITNESSES (0.2).	3.6	\$2,268.00
3/24/2022	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND.	0.1	\$63.00
3/24/2022	MH	ATTEND TO PLAINTIFFS' AND NJDOE LETTERS TO COURT, OPINION AND ORDER ON APPEAL OF MJ DECISION.	0.3	\$70.50
3/25/2022	TJO	CONTINUE REVIEWING AND REVISING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW.	4.2	\$2,646.00
3/28/2022	HDR	REVIEW CORRESPONDENCE REGARDING TRIAL SUBPOENAS ON OAL.	0.1	\$53.00
3/28/2022	TJO	TELEPHONE CONFERENCE WITH C. WEBER REGARDING OAL DEPS (0.1); TELEPHONE CONFERENCE WITH DAG M. CZARNECKI REGARDING SAME (0.1); DRAFT EMAIL TO M. CZARNECKI REGARDING CONFIRMING ACCEPTANCE OF SERVICE (0.1); DRAFT EMAIL TO C. LABIN REGARDING DOCUMENTS TO BE PRODUCED PRIOR TO ROTA DEPOSITION (0.1); REVIEW ROTA DEPOSITION TRANSCRIPT IN PREPARATION OF SUPPLEMENTAL DEPOSITION (3.3).	3.7	\$2,331.00
3/29/2022	TJO	PREPARE FOR ROTA DEPOSITION.	1.5	\$945.00
3/30/2022	HDR	CORRESPONDENCE WITH CO COUNSEL REGARDING DOCUMENT PRODUCTION BY NJDOE.	0.1	\$53.00
3/30/2022	TJO	REVIEW SUPPLEMENTAL DOCUMENT PRODUCTION RECEIVED TODAY (1.6); EMAIL C. LABIN REGARDING FOLLOW UP REQUESTS FOR DOCUMENTS REFERENCED IN MOAs (0.2); TELEPHONE CONFERENCE WITH J. RUE REGARDING STATE'S DOCUMENT PRODUCTION (0.4); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME AND NEW AREAS OF INQUIRY IN DEPOSITIONS (0.3); CONTINUE PREPARING FOR ROTA SUPPLEMENTAL DEPOSITION (4.7).	7.2	\$4,536.00
3/30/2022	MH	ATTEND TO NJDOE SUPPLEMENTAL PRODUCTION SERVED VIA FTP, CERTIFICATION AND LETTER REGARDING DISCOVERY.	0.4	\$94.00
3/31/2022	HDR	CORRESP. W/ CO-COUNSEL REGARDING STRATEGY REGARDING 3.30.22 DISCOVERY PRODUCED BY NJDOE. CORRESP. WITH CO COUNSEL REGARDING DEPOSITION OF MR, ROTA.	0.2	\$106.00
3/31/2022	TJO	CONTINUE PREPARING FOR ROTA DEPOSITION.	8.1	\$5,103.00
4/1/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING DEPOSITION OF A. ROTA.	0.1	\$53.00

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Date	Person	Description of Services	Hours	Amount
4/1/2022	TJO	CONTINUE PREPARING FOR DEPOSITION (0.8); DEPOSE DOMINIC ROTA (6.6); ZOOM CONFERENCE WITH CO-COUNSEL REGARDING REVIEW OF DEPOSITION (0.2); TELEPHONE CONFERENCE WITH J. RUE REGARDING HIS POTENTIAL ATTENDANCE AT 30(b)(6) DEPOSITION (0.1).	7.9	\$4,977.00
4/2/2022	TJO	ZOOM CONFERENCE WITH G. LITTLE REGARDING PREPRATION FOR NJDOE 30(B)(6) DEPOSITION.	0.8	\$504.00
4/4/2022	TJO	REVIEW EMAIL FROM C. LABIN REGARDING AVAILABILITY FOR CONFERENCE CALL (0.1); EMAIL ZOOM LINK TO C. LABIN (0.1); ZOOM CONFERENCE WITH C. LABIN (0.2).	0.4	\$252.00
4/5/2022	TJO	REVIEW EMAIL FROM L. FICHERA REGARDING PROPOSING DATES FOR OAL DEPOSITIONS (0.1); EXCHANGE EMAILS WITH CO-COUNSEL REGARDING SCHEDULE FOR OAL DEPOSITIONS (0.2); TELEPHONE CONFERENCE WITH L. FICHERA REGARDING SAME (0.2); ZOOM CONFERENCE WITH G. LITTLE, J. RUE AND C. REISMAN REGARDING OAL DEPOSITIONS AND PREPARATION FOR NJDOE 30(B)(6) DEPOSITION (1.0); BEGIN REVIEWING TRANSCRIPT OF NJDOE 30(B)(6) DEPOSITION IN PREPARATION FOR MOSCOWITZ DEPOSITION (2.9).	4.4	\$2,772.00
4/5/2022	MH	ATTEND TO LOGISTICS FOR NJDOE PRODUCTION BLOW-UP EXHIBIT FOR DEPOSITION PER T. O'LEARY REQUEST.	0.5	\$117.50
4/6/2022	TJO	REVIEW EMAIL FROM C. REISMAN TO G. LITTLE REGARDING DELIBERATIVE PROCESS PRIVILEGE AND RESPOND (0.1); REVIEW EMAIL FROM C. LABIN AND DOCUMENTS ATTACHED THERETO (0.4); REVIEW SECOND EMAIL FROM C. REISMAN REGARDING DOCUMENTS FOR MOSCOWITZ DEPOSITION (0.2); REVIEW EMAIL FROM L. FICHERA REGARDING DATES FOR MOSCOWITZ AND BASS DEPOSITIONS (0.1); DRAFT RESPONSIVE EMAIL TO L. FICHERA (0.1); CONTINUE REVIEWING NJDOE AND OAL 30(B)(6) TRANSCRIPTS IN PREPARATION FOR MOSCOWITZ DEPOSITION (3.6).	4.7	\$2,961.00
4/7/2022	HDR	CORRESP WITH OPP COUNSEL REGARDING DEP SCHEDULE.	0.1	\$53.00
4/7/2022	TJO	SELECT EXHIBITS FOR NJDOE 30(B)(6) DEPOSITION (2.4); CONTINUE PREPARING FOR MOSCOWITZ DEPOSITION (3.4).	5.8	\$3,654.00
4/8/2022	HDR	CORRESP WITH OAL REGARDING DEPOSITION W/R/T HENDRICKS.	0.1	\$53.00

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4/8/2022	TJO	MEET WITH G. LITTLE REGARDING DEPOSITION PREPARATION (0.6); TRAVEL TO TRENTON (1.2); ATTEND DEPOSITION (5.1); TRAVEL TO NEWARK (1.3); REVIEW EMAIL FROM L. FICHERA REGARDING OAL DEPOSITIONS (0.1); DRAFT REVISED RULE 30(B)(6) SUBPOENA FOR OAL (0.3); DRAFT SUBPOENA FOR C. HENDRICKS (0.2); DRAFT LETTER TO L FICHERA REGARDING SERVING SUBPOENAS (0.2); DRAFT NOTICES OF INTENT TO ISSUE TWO SUBPOENAS (0.2); DRAFT LETTER TO C. LABIN REGARDING SERVING NOTCES OF INTENT (0.1); STAFF DIRECTION REGARDING SCANNING OF DEPOSITION EXHIBITS (0.1); DOWNLOAD SCANNED DEPOSITION EXHIBITS (0.2); EMAIL SCANNED DEPOSITION EXHIBITS TO ALL COUNSEL (0.2).	9.8	\$6,174.00
4/11/2022	TJO	EXCHANGE EMAILS WITH L. FICHERA REGARDING LOCATION OF MOSCOWITZ DEPOSITION (0.1); TELEPHONE CONFERENCE WITH J. RUE (0.4); CONTINUE PREPARING FOR DEPOSITION (1.9).	2.4	\$1,512.00
4/12/2022	HDR	RECEIVE AND REVIEW NOTICE REGARDING 12/14/2021 TRANSCRIPT. INTERNAL CORRESP REGARDING MOTION TO SEAL.	0.1	\$53.00
4/12/2022	HDR	REVIEW CORRESP FROM L. FICHERA REGARDING HENDRICKS SUBPOENA.	0.1	\$53.00
4/12/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE (0.1); TELEPHONE CONFERENCE WITH C. REISMAN (0.1); EXCHANGE EMAILS WITH CO-COUNSEL REGARDING AJOURNMENT OF STEERING COMMITTEE CONFERENCE (0.1); CONTINUE PREPARING FOR MOSCOWITZ DEPOSITION (5.9).	6.2	\$3,906.00
4/12/2022	MH	ATTEND TO NJDOE SUPPLEMENTAL PRODUCTION, CORRESPONDENCE, AND TRANSCRIPT.	0.4	\$94.00
4/13/2022	HDR	RECEIVE AND REVIEW ORDER OF COURT REGARDING MEDIATION. RECEIVE AND REVIEW DRAFT AND FINAL LETTER FROM PLTFFS TO COURT REGARDING MEDIATION. REVIEW CORRESPONDENCE FROM THE TEAM RELATING TO MOSCOWITZ DEPOSITION.	0.3	\$159.00
4/13/2022	TJO	DEPOSE JUDGE MOSCOWITZ (3.4); EMAIL MARKED DEPOSITION EXHIBITS TO COUNSEL (0.2); ZOOM CONFERENCE WITH CO-COUNSEL REGARDING MOSCOWITZ DEPOSITION AND FURTHER DEPOSITIONS (0.8); TELEPHONE CONFERENCE WITH J. VALVERDE REGARDING MOSCOWITZ DEPOSITION AND POTENTIAL ARGUMENT REGARDING NONAPPLICABLILITY OF STATUTE OF LIMITATIONS FOR 23(B)(3) CLASS (0.8); BEGIN REVIEWING TRANSCRIPT OF HENDRICKS DEPOSITION IN ORDER TO DETERMINE IF SHOULD PURSUE FURTHER DEPOSITION (2.4).	7.6	\$4,788.00
4/14/2022	HDR	CORRESP TO NJDOE REGARDING FOLLOW UP REGARDING DOCUMENTS RELATING TO EHLING DEPOSITION.	0.1	\$53.00

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4/14/2022	TJO	REVIEW EMAIL FROM G. LITTLE (0.1); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING DOCUMENT REQUESTS FROM 30(B)(6) DEPOSITION (0.1); REVISE LETTER TO C. LABIN REGARDING SAME (0.4); REVIEW CORRESPONDENCE FILED WITH COURT BY C. LABIN REGARDING MEDIATION (0.1); REVIEW LOCAL CIVIL RULE 301.1 AND EXCHANGE MULTIPLE EMAILS WITH CO-COUNSEL REGARDING IMPLICATIONS OF DELAY IN RESOLUTION OF CASE (0.6); EMAIL J. RUE REGARDING FICHERA OBJECTION TO PRODUCING HENDRICKS FOR DEPOSITION (0.3); TELEPHONE CONFERENCE WITH J. REGARDING SAME (0.1); CONTINUE REVIEW OF HENDRICKS DEPOSITION TRANSCRIPT (1.2); EMAIL AND TEXT C. LABIN REGARDING POTENTIAL MEET AND CONFER REGARDING MEDIATION (0.1).	2.9	\$1,827.00
4/14/2022	MH	ATTEND TO ORDER, CORRESPONDENCE, DEPOSITION EXHIBITS AND TRANSCRIPTS.	0.5	\$117.50
4/15/2022	TJO	ZOOM CONFERENCE WITH C. REISMAN, J. RUE AND G. LITTLE REGARDING COURT'S TEXT ORDER REGARDING MEDIATION.	0.8	\$504.00
4/18/2022	TJO	DRAFT SUBPOENA TO HENDRICKS (0.1); DRAFT TRANSMITTAL LETTER TO PROCESS SERVER (0.2); DRAFT NOTICE OF ISSUANCE OF SUBPOENA (0.1); DRAFT TRANSMITTAL LETTER TO C. LABIN (0.1); PREPARE CERTIFICATION FOR E.M. (0.4); EMAIL CERTIFICATION TO E.M. (0.1); EMAIL CO-COUNSEL REGARDING NEED FOR ADDITIONAL CERTIFICATIONS (0.1).	1.1	\$693.00
4/20/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING CALL WITH DRYZGA (0.1); REVIEW AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN REQUESTING SETTLEMENT CONFERENCE BEFORE JUDGE SKAHILL (0.1).	0.2	\$126.00
4/21/2022	HDR	RECEIVE AND REVIEW CORRESP FROM G. LITTLE TO THE COURT REGARDING MEDIATION.	0.1	\$53.00
4/21/2022	TJO	EXCHANGE EMAILS WITH CO-COUNSEL REGARDING COMMENTING ON DRAFT OF EMAIL TO DRYZGA.	0.1	\$63.00
4/22/2022	TJO	LISTEN TO VOICEMAIL FROM L. FICHERA (0.1); TELEPHONE CONFERENCE WITH L. FICHERA (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING CALL WITH FICHERA (0.2).	0.5	\$315.00
4/25/2022	TJO	EMAIL DEPOSITION EXHIBITS TO COURT REPORTER (0.2); REVIEW EMAIL FROM COURT REPORTER FORWARDING EHLING TRANSCRIPT AND FORWARD TRANSCRIPT TO CO-COUNSEL (0.1); TELEPHONE CONFERENCE WITH D. DWYER (0.4).	0.7	\$441.00
4/26/2022	TJO	EMAIL CO-COUNSEL REGARDING AVAILABILITY FOR STEERING COMMITTEE CALL.	0.1	\$63.00

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4/27/2022	HDR	CORRESP WITH NJDOE RELATING TO DOCUMENTS REQUESTED DURING 30B6 DEPOSITION.	0.1	\$53.00
4/27/2022	TJO	EMAIL CO-COUNSEL REGARDING AVAILABILITY FOR CALL (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SETTLEMENT ISSUES (0.2); PARTICIPATE IN ZOOM CONFERENCE WITH CO-COUNSEL (0.9); REVIEW JOINT MEMO FROM C. REISMAN AND J. RUE REGARDING SETTLEMENT CONSIDERATIONS (0.5).	1.7	\$1,071.00
4/28/2022	HDR	CORRESP WITH CO COUNSEL REGARDING ANALYSIS REGARDING IDEA ANNUAL STATE APPLIC.	0.1	\$53.00
4/28/2022	MH	ATTEND TO NJDOE SUPPLEMENTAL PRODUCTION, CORRESPONDENCE AND DESTRUCTION OF UNDERACTED MATERIAL.	0.4	\$94.00
4/29/2022	HDR	CORRESP WITH OAL REGARDING HENDRICKS DEPO AND SUBPOENA.	0.1	\$53.00
4/29/2022	TJO	TELEPHONE CONFERENCE WITH J. ROSEN VALVERDE REGARDING STATUTE OF LIMITATIONS ISSUE FOR B(3) CLASS (0.2); REVIEW MEMO PREPARED BY J. RUE AND C. REISMAN (0.5); ZOOM CONFERENCE WITH J. RUE AND C. REISMAN (1.3); RESEARCH REGARDING OBLIGATION TO APPEAR FOR SUBPOENA IF MOTION TO QUASH IS PENDING (0.5); EMAIL L. FICHERA REGARDING HENDRICKS DEPOSITION (0.2); EMAIL COURT REPORTER REGARDING SAME (0.1).	2.8	\$1,764.00
5/2/2022	HDR	ATTEND TO OMNIBUS MOTION TO SEAL. CORRESP WITH B. TROYAN REGARDING SAME.	0.2	\$106.00
5/2/2022	HDR	STUDY TEXT ORDER OF COURT REGARDING SETTLEMENT MEMO. CORRESP WITH TEAM REGARDING SAME.	0.1	\$53.00
5/2/2022	TJO	REVIEW EMAIL FROM L. FICHERA REGARDING HENDRICKS DEPOSITION (0.1); TELEPHONE CONFERENCE WITH L. FICHERA REGARDING SAME (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING CALL WITH FICHERA AND REFUSAL TO PRODUCE WITNESS FOR DEPOSITION (0.2); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1); REVIEW SECOND EMAIL FROM L. FICHERA REGARDING OBJECTION TO DEPOSITION (0.1); DRAFT RESPONSIVE EMAIL (0.2); TELEPHONE CONFERENCE WITH DAG WEBER REGARDING REFUSAL TO PRODUCE WITNESS FOR DEPOSITION (0.1); REVIEW CORRESPONDENCE FROM L. FICHERA TO JUDGE SKAHILL REGARDING SAME (0.1); DRAFT LETTER TO JUDGE SKAHILL REGARDING RESPONDING TO FICHERA LETTER (0.6); PREPARE FOR HENDRICKS DEPOSITION (3.6).	5.3	\$3,339.00
5/3/2022	HDR	RECEIVE AND REVIEW CORRESP FROM J. RUE TO THE COURT.	0.1	\$53.00

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5/3/2022	HDR	ATTEND TO DRAFT LETTER REGARDING HENDRICKS SUBPOENA. REVIEW/ ANALYZE R. THURSTON LETTER TO COURT.	0.6	\$318.00
5/3/2022	TJO	TRAVEL TO C. REISMAN'S OFFICE (1.6); ZOOM CONFERENCE WITH C REISMAN, J. RUE AND G. LITTLE (0.4); ATTEND DEPOSITION (0.4); TELEPHONE CONFERENCE WITH C. REISMAN AND G. LITTLE (0.3); TRAVEL TO NEWARK NEW JERSEY (1.7); DRAFT LETTER TO JUDGE SKAHILL REGARDING HENDRICKS DEPOSITION (0.7).	5.1	\$3,213.00
5/5/2022	HDR	RECEIVE AND REVIEW PROPOSED LTR TO COURT REGARDING DISPUTE RESOLUTION, CORRESP WITH PLTFF TEAM REGARDING SAME.	0.2	\$106.00
5/5/2022	TJO	REVIEW DRAFT DEMAND LETTER PREPARED BY J. RUE (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING DRAFT LETTER BY J. RUE (0.2); REVISE LETTER AND EMAIL TO J. RUE (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING REVISIONS TO LETTER (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING DEPOSITION EXHIBITS (0.1); ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING DEMAND LETTER (0.2).	0.9	\$567.00
5/9/2022	TJO	REVIEW AND COMMENT ON FINAL DRAFT OF SETTLEMENT DEMAND LETTER (0.2); EXCHANGE EMAILS WITH G. LITTLE REGARDING SCHEDULING CONFERENCE CALL (0.1); EMAIL ZOOM LINK TO G. LITTLE (0.1); ZOOM CONFERENCE WITH G. LITTLE REGARDING BASS DEPOSITION (0.5).	0.9	\$567.00
5/9/2022	MH	ATTEND TO ORDERS, CORRESPONDENCE, AND TRANSCRIPTS.	0.5	\$117.50
5/10/2022	HDR	REVIEW CORRESP FROM OAL REGARDING DEPOSITION DISPUTES. CORRESP WITH TJO REGARDING SAME. DEVELOP STRATEGY REGARDING SAME. RECEIVE AND REVIEW COURT NOTICES REGARDING SAME.	0.5	\$265.00
5/10/2022	TJO	ASSIST G. LITTLE IN PREPARING FOR OAL 30(B)(6) DEPOSITION (2.6); REVIEW CORRESPONDENCE FROM L. FICHERA REGARDING ADJOURNING DEPOSITION (0.1); EMAIL AND LEAVE VOICEMAIL TO FICHERA REGARDING UNILATERAL ADJOURNMENT OF DEPOSITION (0.1); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1); TELEPHONE CONFERENCE WITH JUDGE SKAHILL'S LAW CLERK REGARDING SAME (0.2); REVIEW TEXT ORDER FROM COURT REGARDING SCHEDULING CONFERENCE (0.1); ATTEND TELEPHONE CONFERENCE WITH JUDGE SKAHILL REGARDING DEPOSITION SCHEDULING (0.3); ZOOM CONFERENCE WITH CO-COUNSEL REGARDING CONFERENCE WITH JUDGE SKAHILL (0.3).	3.9	\$2,457.00
5/10/2022	MH	ATTEND TO ORDER SETTING CONFERENCE.	0.1	\$23.50

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5/11/2022	TJO	ASSIST G. LITTLE WITH DEPOSITION PREPARATION (0.4); ATTEND BASS DEPOSITION (3.4); CONFER WITH G. LITTLE AFTER DEPOSITON REGARDING LITGATION AND SETTLEMENT STRATEGY (1.6); TELEPHONE CONFERENCE WITH G. LITTLE AND C. REISMAN REGARDING SAME (0.5); TELEPHONE CONFERENCE WITH J. RUE (0.1); REVIEW ORDER ENTERED BY COURT (0.1).	6.1	\$3,843.00
5/11/2022	MH	ATTEND TO ORDER, CORRESPONDENCE AND DEPOSITIONS TRANSCRIPTS/EXHIBITS.	0.4	\$94.00
5/12/2022	TJO	REVIEW ORDER ENTERED BY COURT REGARDING DEPOSITION DISPUTES (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SETTLEMENT POSITION (0.3).	0.4	\$252.00
5/13/2022	HDR	REVIEW AND ANALYZE CORRESP FORM JOHN RUE REGARDING SUPPL DISCOVERY + TRIAL DATE.	0.1	\$53.00
5/13/2022	TJO	ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING HENDRICKS DEPOSITION (1.0); DRAFT LETTER TO JUDGE SKAHILL REGARDING ADVISING OF DECISION TO NOT DEPOSE HENDRICKS (0.2); ZOOM CONFERENCE WITH J. RUE, G. LITTLE AND C. REISMAN REGARDING SETTLEMENT STRATEGY (0.5).	1.7	\$1,071.00
5/13/2022	MH	ATTEND TO PHV MOTION, ORDER AND CORRESPONDENCE.	0.4	\$94.00
5/14/2022	TJO	DRAFT EMAIL TO C. LABIN ADVISNG OF NO OBJECTION TO ADJOURNING 5/24 CONFERENCE.	0.1	\$63.00
5/16/2022	TJO	REVIEW CORRESPONDENCE FROM R. THURSTON (0.1); REVIEW CORRESPONDENCE FROM C. LABIN AND EMAIL CO-COUNSEL (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING BASS DEPOSITION (0.1); TELEPHONE CONFERENCE WITH J. RUE (0.1).	0.4	\$252.00
5/17/2022	HDR	RECEIVE AND REVIEW TRIAL NOTIF FROM COURT.	0.1	\$53.00
5/17/2022	TJO	REVIEW DRAFT MEMO RECEIVED FROM J. VALVERDE REGARDING STATUTE OF LIMITATIONS APPLICABILITY TO STATE (0.5); EXCHANGE EMIALS WITH J. VALVERDE REGARDING SAME (0,3).	0.8	\$504.00
5/18/2022	TJO	REVIEW EMAIL FROM J. RUE REGARDING RESCHEDULING CALL (0.1); TELEPHONE CONFERENCE WITH C. REISMAN (0.1).	0.2	\$126.00
5/18/2022	MH	ATTEND TO ORDER, CORRESPONDENCE, AND TRIAL NOTICE.	0.3	\$70.50
5/19/2022	HDR	REVIEW CORRESPONDENCE FROM COURT REGARDING 5/24 COURT CONF.	0.1	\$53.00
5/19/2022	MH	ATTEND TO ORDER RESCHEDULING CONFERENCE.	0.1	\$23.50
5/20/2022	HDR	RECEIVE AND REVIEW CORRESP FILED BY DOE W. COURT.	0.1	\$53.00

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5/20/2022	TJO	REVIEW CORRESPONDENCE FILED BY R. THURSTON WITH COURT (0.1); EXCHANGE MULTIPLE EMAILS WITH J. RUE REGARDING THURSTON CORRESPONDENCE AND IMPLICATIONS ON CASE (0.2).	0.3	\$189.00
5/22/2022	TJO	DRAFT LETTER TO JUDGE SKAHILL CLARIFYING POSITION OF PUTATIVE CLASS IN LIGHT OF THURSTON CORRESPONDENCE.	0.3	\$189.00
5/23/2022	HDR	RECEIVE AND REVIEW PLTFFS LETTER TO THE COURT REGARDING PROTECTIVE ORDER.	0.1	\$53.00
5/23/2022	MH	ATTEND TO LETTER TO COURT AND ELECTRONICALLY FILE THE SAME.	0.1	\$23.50
5/25/2022	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING AVAILABILITY FOR CALL WITH AMICUS (0.1); REVIEW EMAIL FROM C. REISMAN AND RESPOND (0.1).	0.2	\$126.00
5/26/2022	TJO	REVIEW SETTLEMENT POSITION MEMORANDUM AND PROVIDE COMMENTS ON SAME TO C. REISMAN, G. LITTLE AND J. RUE (0.6); EXCHANGE EMAILS WITH J. RUE REGARDING PROPOSED ADDITION TO SETTLEMENT MEMO REGARDING WEAKNESSES IN CASE (0.2).	0.8	\$504.00
5/27/2022	HDR	REVIEW CORRESPONDENCE FROM JOHN RUE REGARDING STRATEGY REGARDING SETTLEMENT NEGOTIATIONS.	0.1	\$53.00
5/27/2022	TJO	PARTICIPATE IN ZOOM CONFERENCE WITH G. LITTLE, J. RUE AND J. VALVERDE REGARDING SETTLEMENT POSITION.	1.6	\$1,008.00
5/31/2022	HDR	REVIEW CORRESPONDENCE WITH R. THURSTON REGARDING SETTLEMENT STRATEGY.	0.1	\$53.00
5/31/2022	TJO	REVIEW EMAIL FROM JUDGE SKAHILL (0.1); EXCHANGE EMAILS WITH J. RUE AND G. LITTLE REGARDING AVAILABILITY FOR ALTERNATE DATE PROPOSED BY JUDGE FOR SETTLEMENT CONFERENCE (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1); REVIEW AND COMMENT ON DRAFT EMAIL BY J. RUE TO JUDGE SKAHILL REGARDING SAME (0.1).	0.4	\$252.00
6/1/2022	TJO	PARTICIPATE IN ZOOM CONFERENCE WITH G. LITTLE AND J. RUE REGARDING SETTLEMENT POSITION STATEMENT (0.6); REVIEW DEPOSITION TRANSCRIPTS AND REVISE POSITION STATEMENT (4.4).	5.0	\$3,150.00
6/2/2022	HDR	ATTEND TO SETTLEMENT POSITION STATEMENT TO COURT.	0.3	\$159.00
6/2/2022	TJO	REVISE AND FINALIZE POSITION STATEMENT FOR SETTLEMENT CONFERENCE AND EMAIL SAME TO J. RUE.	2.5	\$1,575.00
6/3/2022	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SETTLEMENT POSITION OF STATE (0.4).	0.6	\$378.00

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6/4/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE REGARDING SETTLEMENT CONFERENCE STRATEGY (0.3); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.5); SECOND TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.5).	1.3	\$819.00
6/6/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING MEDIATION STATEMENT/SETTLEMENT CONF.	0.1	\$53.00
6/6/2022	MH	ATTEND TO BASS TRANSCRIPT AND ORDERS.	0.2	\$47.00
6/7/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN (0.2); ANALYZE INVOICES IN PREPARATION FOR SETTLEMENT CONFERENCE AND PROVIDE J. RUE WITH FIRM'S BILLING INFORMATION (0.6); PREPARE FOR SETTLEMENT CONFERENCE (0.8).	1.6	\$1,008.00
6/8/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SETTLEMENT CONFERENCE PREPARATION (0.4); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.4); ZOOM CONFERENCE WITH G. LITTLE, C. REISMAN, AND J. RUE REGARDING SAME (1.0); ZOOM CONFERENCE WITH ALL PLAINTIFF'S COUNSEL REGARDING SAME (1.0); REVIEW CORRESPONDENCE FROM L. FICHERA (0.2).	3.0	\$1,890.00
6/9/2022	HDR	REVIEW CORRESPONDENCE REGARDING UPDATE REGARDING SETTLEMENT CONF WITH COURT.	0.1	\$53.00
6/9/2022	HDR	CORRESP WITH CO COUNSEL REGARDING SETTLEMENT CONF WITH JUDGE SKAHILL.	0.1	\$53.00
6/9/2022	TJO	ATTEND SETTLEMENT CONFERENCE INCLUSIVE OF TRAVEL BETWEEN NEWARK AND CAMDEN (7.1); DRAFT EMAIL TO DISCO (DISCOVERY CONSULTANT) AND PROVIDE INFORMATION FOR CONTRACT FOR CASE BUILDER SERVICE (0.3); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING FEE APPLICATION (0.3); EXCHANGE MULTIPLE EMAILS WITH J. RUE REGARDING SAME (0.2).	7.9	\$4,977.00
6/10/2022	HDR	CORRESP WITH CO COUNSEL REGARDING SETTLEMENT CONF WITH COURT.	0.1	\$53.00
6/10/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN REGARDING IMPLICATION OF ATTORNEYS' FEES ON SETTLEMENT (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.4); REVIEW EMAILS FROM G. LITTLE AND C. REISMAN REGARDING SAME (0.1); TELEPHONE CONFERENCE WITH J. RUE REGARDING QUOTATION FROM DISCO REGARDING LITIGATION SUPPORT SERVICES (0.1).	0.8	\$504.00
6/13/2022	TJO	REVIEW TEXT ORDER ENTERED BY COURT.	0.1	\$63.00
6/13/2022	MH	ATTEND TO ORDER SETTING DEADLINE FOR EX PARTE SUBMISSIONS.	0.1	\$23.50
6/16/2022	TJO	EMAIL CO-COUNSEL REGARDING PROCEDURAL HISTORY OF CURRENT CASE PENDING IN OAL AND LIKELIHOOD THAT 45 DAY TIME LIMIT WILL BE EXCEEDED.	0.3	\$189.00

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Date	Person	Description of Services	Hours	Amount
6/17/2022	HDR	CORRESP WITH CO COUNSEL REGARDING DISPUTE RESOLUTION PROCESS.	0.1	\$53.00
6/19/2022	TJO	REVIEW AND COMMENT ON PROPOSED ORDER TO SUBMIT TO JUDGE SKAHILL.	1.2	\$756.00
6/20/2022	TJO	CONTINUE REVISING FORM OF ORDER TO SUBMIT TO JUDGE SKAHILL (0.5); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING FORM OF ORDER (0.5); ZOOM CONFERENCE WITH G. LITTLE AND J. RUE REGARDING SAME (0.9); EMAIL C. REISMAN REGARDING ZOOM CONFERENCE (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SAME (0.2).	2.2	\$1,386.00
6/21/2022	HDR	ATTEND TO MEDIATION POSITION STATEMENT. REVIEW REVISIONS TO DRAFT. REVIEW CORRESPONDENCE FROM CO-COUNSEL REGARDING SAME.	0.5	\$265.00
6/21/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING FORM OF ORDER TO BE SUBMITTED TO JUDGE SKAHILL (0.3); EMAIL J. ROSEN VALVERDE, COUNSEL FOR AMICUS, REGARDING RUE EMAIL (0.1); SECOND TELEPHONE CONFERENCE WITH G. LITTLE REGARDING FORM OF ORDER (0.2); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SAME (0.1).	0.7	\$441.00
6/22/2022	TJO	REVIEW LATEST DRAFT OF PROPOSED FROM OF ORDER TO BE SUBMITTED TO JUDGE SKAHILL (0.3); DRAFT EMAIL TO G. LITTLE REGARDING COMMENTS ON ORDER (0.1); REVIEW EMAIL FROM J. RUE AND RESPOND (0.1).	0.5	\$315.00
6/23/2022	TJO	REVIEW AND COMMENT ON DRAFT INJUNCTION PRIOR TO SUBMITTAL TO JUDGE SKAHILL (0.3); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SAME (0.2); TELEPHONE CONFERENCE WITH J. RUE REGARDING SAME (0.1).	0.6	\$378.00
6/24/2022	HDR	REVIEW CORRESPONDENCE FROM CO-COUNSEL W/R/T FEDERAL DAYS.	0.1	\$53.00
6/24/2022	TJO	REVIEW EMAIL FROM R. THURSTON AND RESPOND.	0.1	\$63.00
6/28/2022	TJO	REVIEW PRCEDENTIAL OPINION FROM THIRD CIRCUIT REVERSING CLASS CERTIFICATION.	0.6	\$378.00
6/29/2022	TJO	REVIEW EMAIL FROM OAL.	0.1	\$63.00
6/30/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING RECENT OAL DECISION.	0.5	\$265.00
7/1/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING OAL PRECEDENT.	0.1	\$53.00
7/2/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING PROPOSED SETTLEMENT POSITION STMNT.	0.1	\$53.00
7/4/2022	HDR	REVIEW CORRESPONDENCE FROM G LITTLE REGARDING TRIAL. REVIEW CORRESPONSENCE FROM R THURSTON REGARDING OAL PROCEDURAL DECISION.	0.1	\$53.00

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7/6/2022	HDR	REVIEW CORRESP FROM C. LABIN TO THE COURT REGARDING ADJOURNMENT REQUEST REGARDING TRIAL DATE. CORRESP WITH CO-COUNSEL REGARDING RESPONSE TO SAME.	0.2	\$106.00
7/7/2022	TJO	REVIEW DRAFT LETTER TO COURT REGARDING OBJECTING TO ADJOURNMENT REQUEST (0.1); REVIEW FINAL LETTER TO COURT REGARDING SAME (0.1).	0.2	\$126.00
7/8/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING DOE SUBMISSION TO THE COURT REGARDING TRIAL DATE.	0.1	\$53.00
7/8/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE.	0.3	\$189.00
7/11/2022	HDR	REVIEW C. LABIN CORRESP TO COURT REGARDING TRIAL ADJOURNMENT REQUEST.	0.1	\$53.00
7/11/2022	MH	ATTEND TO DEFENDANTS REQUEST FOR TRIAL ADJOURNMENT AND J. RUE CORRESPONDENCE.	0.2	\$47.00
7/12/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE.	0.2	\$126.00
7/13/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE.	0.2	\$126.00
7/14/2022	HDR	REVIEW CORRESPONDENCE RELATING TO SETTLEMENT CONFERENCE.	0.1	\$53.00
7/18/2022	MH	ATTEND TO LETTERS TO COURT.	0.2	\$47.00
7/18/2022	MH	ATTEND TO ORDER SETTING CONFERENCE.	0.1	\$23.50
7/19/2022	TJO	REVIEW ORDER ENTERED BY COURT ON 7/14/22 (0.1); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING UPDATE ON PROCEEDINGS THAT OCCURRED WHILE AWAY ON PERSONAL TIME OFF (0.4).	0.5	\$315.00
7/20/2022	TJO	ZOOM CONFERENCE WITH CO-COUNSEL AND J. ROSEN VALVERDE (0.8); REVIEW EMAIL FROM J. RUE REGARDING WITNESS PRIORITIES AND FORWARD MEMO REGARDING SAME (0.1); EMAIL B. MARVIN REGARDING AVAILABILITY FOR TRIAL (0.1); TELEPHONE CONFERENCE WITH B. MARVIN REGARDING SAME (0.2).	1.2	\$756.00
7/21/2022	TJO	REVIEW EMAIL FROM J. RUE AND RESPOND REGARDING PLAINTIFF'S WITNESSES AT TRIAL (0.2); REVIEW EMAIL FROM D. GILES AND RESPOND REGARDING MM AVAILABILITY TO TESTIFY (0.1).	0.3	\$189.00
7/22/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE (0.6); REVIEW EMAIL FROM D. GILES AND RESPOND (0.1); TELEPHONE CONFERENCE WITH D. GILES (0.2).	0.9	\$567.00

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7/25/2022	TJO	PARTICIPATE IN CONFERENCE WITH JUDGE SKAHILL (3.8); ZOOM CONFERENCE WITH CO-COUNSEL AFTER CONFERENCE WITH JUDGE SKAHILL (0.2); TELEPHONE CONFERENCE WITH J. ROSEN VALVERDE REGARDING SETTLEMENT CONFERENCE WITH JUDGE SKAHILL (0.3); REVIEW AND COMMENT ON EMAIL FROM J. RUE REGARDING OUTLINE OF LETTER TO JUDGE SKAHILL (0.2).	4.5	\$2,835.00
7/26/2022	HDR	CORRESP WITH CO COUNSEL REGARDING 7/25/22 SETTLEMENT CONF.	0.1	\$53.00
7/27/2022	HDR	REVIEW LETTER TO JUDGE SKAHILL REGARDING SETTLEMENT DISCUSSION.	0.1	\$53.00
7/28/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING CALL WITH LABIN AND TRIAL PREPARATION (0.4); REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL (0.1).	0.5	\$315.00
8/1/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL RELATING TO IMPACT OF RECENT OSERS ACTIVITIES.	0.1	\$53.00
8/1/2022	TJO	REVIEW SUBPOENA RECEIVED FROM DAG LABIN; EMAIL CO-COUNSEL.	0.1	\$63.00
8/2/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE.	0.2	\$126.00
8/3/2022	HDR	REVIEW CORRESPONENE FROM G. LITTLE REGARDING TRIAL STRATEGY.	0.1	\$53.00
8/4/2022	TJO	EMAIL CO-COUNSEL REGARDING NON PRECEDENTIAL DECISION FROM THIRD CIRCUIT REVERSING CLASS CERTIFICATION (0.1); EXCHANGE EMAILS WITH C. REISMAN REGARDING PRETRIAL ORDER (0.1).	0.2	\$126.00
8/9/2022	TJO	BEGIN REVISING PRETRIAL ORDER.	0.3	\$189.00
8/10/2022	HDR	REVIEW CORRESPONDENCE FROM CO-COUNSEL W/R/T TRIAL DATE.	0.1	\$53.00
8/10/2022	TJO	REVIEW EMAIL FROM D. GILES REGARDING RESCHEDULING CONFERENCE CALL.	0.1	\$63.00
8/11/2022	TJO	PREPARE TRIAL SUBPOENAS FOR 4 OAL WITNESSES AND DRAFT LETTERS TO EACH WITNESS (1.8); EMAIL TRIAL SUBPOENAS TO L. FICHERA (0.1); REVIEW FILES OF ALL PLAINTIFFS AND ASSESS LANGUAGE IN PREHARING ORDER FOR EACH WITNESS WITH RESPECT TO WAIVER IMPLICATIONS (1.1); PREPARE TRIAL SUBPOENAS FOR 5 NJDOE WITNESSES AND PREPARE LETTERS FOR EACH WITNESS (0.6).	3.6	\$2,268.00
8/12/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING OFFICE OF SPECIAL EDUC SITE/POSTINGS.	0.1	\$53.00
8/12/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING TRIAL PREPARATION (0.2); REVIEW EMAILS EXCHANGED BETWEEN CO-COUNSEL REGARDING NJDOE WEBSITE AND RESPOND (0.1); TRANSMIT ALL DEPOSITION EXHIBITS TO G. LITTLE FOR TRIAL PREPARATION (0.5).	0.8	\$504.00

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8/15/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING TRIAL PREPARATION (0.5); EMAIL S/J MOTIONS, EXHIBITS TO G. LITTLE (0.6); ZOOM CONFERENCE WITH J. RUE, D. GILES, AND G. LITTLE (0.7); REVIEW EMAIL FROM C. LABIN AND RESPOND (0.1); REVIEW EMAIL FROM L. FICHERA AND RESPOND (0.1).	2.0	\$1,260.00
8/16/2022	TJO	TELEPHONE CONFERENCE WITH B. MARVIN REGARDING SCHEDULING TRIAL PREPARATION SESSION (0.1); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING TRIAL STRATEGY (0.2); REVIEW EMAIL FROM E. PERRY AND RESPOND (0.1); EXCHANGE TEXT MESSAGES WITH G. LITTLE REGARDING PREPARATION SESSION FOR PERRY (0.1).	0.5	\$315.00
8/17/2022	HDR	REVIEW CORRSPONDENCE FROM CO COUNSEL REGARDING EHLING PRESENTATION.	0.1	\$53.00
8/17/2022	TJO	TELEPHONE CONFERENCE WITH E. PERRY REGARDING AVAILABILITY FOR PREPARATION SESSION (0.1); TELEPHONE CONFERENCE WITH E. MARVIN REGARDING SAME (0.1); SEND CALENDAR INVITES FOR MARVIN AND PERRY PREPARATION SESSIONS (0.1).	0.3	\$189.00
8/18/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING TRIAL PREPARATION (0.2); SECOND TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.2); REVIEW MOSCOWITZ DEPOSITION TRANSCRIPT (2.3); BEGIN OUTLINE OF DIRECT EXAMINATION OF MOSCOWITZ (3.7).	6.4	\$4,032.00
8/19/2022	TJO	CONTINUE SELECTING EXHIBITS AND OUTLINING MOSCOWITZ DIRECT EXAM (5.1); REVIEW OPINION GRANTING CLASS CERTIFICATION (0.7); EXCHANGE EMAILS WITH CO-COUNSEL REGARDING SAME (0.2); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SAME (0.2); TELEPHONE CONFERENCE WITH AMICUS COUNSEL REGARDING SAME (0.2); TELEPHONE CONFERENCE WITH G. LITTLE: IMPLICATIONS OF COURT'S DECISION AND STRATEGY (0.8).	7.2	\$4,536.00
8/19/2022	MH	CORRESPOND WITH T. O'LEARY AND STAMP TRIAL EXHIBITS PER REQUEST.	0.5	\$117.50
8/20/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE (0.2); TELEPHONE CONFERENCE WITH J. RUE (0.3); CONTINUE SELECTING EXHIBITS AND OUTLINING MOSCOWITZ DIRECT EXAM (6.2).	6.7	\$4,221.00
8/21/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN (0.2); CONTINUE SELECTING EXHIBITS AND OUTLINING DIRECT EXAM OF MOSCOWITZ (3.0).	3.2	\$2,016.00
8/22/2022	TJO	ZOOM CONFERENCE WITH J. RUE, K. RUE, C. REISMAN, AND G. LITTLE REGARDING STRATEGY (0.8); CONTINUE SELECTING EXHIBITS AND PREPARING OUTLINE OF MOSCOWITZ DIRECT EXAMINATION (3.7).	4.5	\$2,835.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
8/23/2022	HDR	RECEIVE/REVIEW S. ROGERS TRIAL SUBPOENA.	0.1	\$53.00
8/23/2022	TJO	ZOOM CONFERENCE WITH K. RUE AND G. LITTLE REGARDING TRIAL PREPARATION (1.4); DRAFT SUBPOENA AND TRANSMITTAL LETTER TO S. ROGERS (0.3); CONTINUE SELECTING EXHIBITS FOR MOSCOWITZ DIRECT (0.7); REVIEW MARVIN DP FILE AND BEGIN REVIEWING TRANSCRIPT OF MARVIN DEPOSITION FOR TRIAL PREPARATION (4.7).	7.1	\$4,473.00
8/23/2022	MH	ATTEND TO STAMPING TRIAL EXHIBITS.	0.4	\$94.00
8/24/2022	TJO	PARTICIPATE IN ZOOM CONFERENCE WITH CO-COUNSEL (1.0); TELEPHONE CONFERENCE WITH D. DWYER REGARDING TRIAL ISSUES (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.4); REVIEW AND COMMENT ON PROPOSED CORRESPONDENCE TO JUDGE HILLMAN (0.1); SELECT EXHIBITS FOR PERRY DIRECT EXAMINATION AND BEGIN REVIEWING HER DEPOSITION TRANSCRIPT (5.3).	7.0	\$4,410.00
8/25/2022	TJO	DRAFT LETTER TO JUDGE HILLMAN REGARDING REQUESTING STATUS CALL WITH COURT (0.2); CONTINUE PREPARING FOR TRIAL (6.6); TELEPHONE CONFERENCE WITH GREG LITTLE REGARDING TRIAL PREPARATION (0.2).	7.0	\$4,410.00
8/25/2022	MH	ATTEND TO LETTER TO COURT.	0.1	\$23.50
8/26/2022	HDR	REVIEW CORRESPONDENCE RELATING TO TRIAL LOGISTICS/COURT REPORTER.	0.1	\$53.00
8/26/2022	TJO	REVIEW SANDERS DEPOSITION TRANSCRIPT AND SELECT TRIAL EXHIBITS IN CONNECTION WITH TRIAL PREPARATON.	6.2	\$3,906.00
8/27/2022	HDR	REVIEW CORRESPONDENCE FROM CO-COUNSEL REGARDING NJDOE RECORD RETENTION.	0.1	\$53.00
8/29/2022	HDR	CORRESP WITH TJO REGARDING STRATEGY REGARDING TRIAL LOGISTICS. CONDUCT RESEARCH REGARDING PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW.	0.6	\$318.00
8/29/2022	TJO	CONTINUE TRIAL PREPARATION WITH RESPECT TO EM DIRECT EXAMINATION.	7.6	\$4,788.00
8/29/2022	MH	ATTEND TO TRIAL EXHIBITS.	0.2	\$47.00
8/30/2022	HDR	REVIEW CORRESPONDENCE AND DEVELOP STRATEGY REGARDING POTENTIAL STAY OF PROCEEDINGS.	0.3	\$159.00
8/30/2022	HDR	CORRESP WITH CO COUNSEL REGARDING TRIAL AND SETTLEMENT STRATEGY.	0.2	\$106.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
8/30/2022	TJO	PREPARE J. VALVERDE FOR TRIAL (2.0); PREPARE E.M. FOR TRIAL (2.5); REVIEW AND COMMENT ON PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW (1.0); REVIEW LETTER FROM C. LABIN TO COURT (0.1); REVIEW AND COMMENT ON RESPONSIVE LETTER BY J. RUE (0.2); PREPARE DEMONSTRATIVES FOR E.P. (1.8); CONTINUE PREPARING FOR TRIAL (1.6).	9.2	\$5,796.00
8/30/2022	MH	ATTEND TO TRIAL EXHIBITS.	0.2	\$47.00
8/30/2022	MH	ATTEND TO LABIN AND RUE'S LETTERS TO COURT AND PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW.	0.3	\$70.50
8/31/2022	HDR	CORRESP WITH CO COUNSEL REGARDING STRATEGY REGARDING TRIAL AND SETTLEMENT. MTG WITH TJO REGARDING SAME.	0.2	\$106.00
8/31/2022	HDR	REVIEW DEFENDANTS PROPOSED FINDINGS OF FACT AND CONCLUSIONS OF LAW.	0.5	\$265.00
8/31/2022	TJO	MEET WITH E. PERRY, C. REISMAN, AND G. LITTLE REGARDING PREPARATION SESSION (2.5); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SETTLEMENT NEGOTIATIONS (0.2); CONTINUE PREPARING FOR TRIAL (6.4).	9.1	\$5,733.00
9/1/2022	HDR	REVIEW CORRESPONDENCE FROM CO-COUNSEL RELATING TO TRIAL. REVIEW TEXT ORDER FROM COURT. CORRESP WITH TJO RELATING TO TRIAL.	0.3	\$159.00
9/1/2022	HDR	REVIEWCORRESP FROM CO COUNSEL REGARDING NJDOE'S STAY MOTION.	0.1	\$53.00
9/1/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE (0.1); TELEPHONE CONFERENCE WITH C. REISMAN (0.1); TELEPHONE CONFERENCE WITH G. LITTLE (0.1); ZOOM CONFERENCE WITH CO-COUNSEL REGARDING DRAFT LETTER TO JUDGE HILLMAN (0.3); REVIEW OPINION DENYING SUMMARY JUDGMENT MOTIONS (0.7); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SAME (0.4); ZOOM CONFERENCE WITH G. LITTLE AND C. REISMAN REGARDING SAME (0.5); SECOND TELEPHONE CONFERENCE WITH G. LITTLE (0.1); CONTINUE TRIAL PREPARATION (6.3).	8.6	\$5,418.00
9/2/2022	HDR	REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING TRIAL/SETTLEMENT STRATEGY AND POTENTIAL MEDIATION.	0.1	\$53.00
9/2/2022	HDR	RECEIVE AND REVIEW CORRESP FROM J. RUE TO COURT.	0.1	\$53.00
9/2/2022	TJO	PREPARE FOR PRE-TRIAL CONFERENCE.	3.8	\$2,394.00
9/3/2022	HDR	REVIEW CORRESPONDENCE FROM DENISE L. REGARDING RECENT AUTHORITY FROM THE THIRD CIRCUIT RELATING TO CLASS CERTIF.	0.1	\$53.00

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9/4/2022	TJO	CONTINUE PREPARING FOR PRE-TRIAL CONFERENCE.	2.2	\$1,386.00
9/5/2022	TJO	CONTINUE PREPARING FOR PRETRIAL CONFERENCE.	4.2	\$2,646.00
9/6/2022	HDR	REVIEW AND ANALYZE MINUTES FROM 9/6/22 CONFERENCE.	0.1	\$53.00
9/6/2022	TJO	TRAVEL TO CAMDEN (1.8); ATTEND PREHEARING CONFERENCE (2.2); MEET WITH ADVERSARYS IN COURTHOUSE TO ADDRESS PRETRIAL ISSUES (4.2); TRAVEL TO C. REISMAN'S OFFICE (0.2); CONFER WITH CO-COUNSEL REGARDING PRETRIAL ISSUES (1.0); TRAVEL TO NEWARK (1.7).	11.1	\$6,993.00
9/7/2022	HDR	RECEIVE AND REVIEW CORRESP REGARDING SUMM JUDGMENT RULINGS. RECEIVE AND REVIEW CORRESP REGARDING MOTIONS IN LIMINE. RECEIVE AND REVIEW TEXT ORDER FROM COURT REGARDING MOTIONS IN LIMINE.	0.2	\$106.00
9/7/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN REGARDING ORAL ARGUMENT (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.3); REVIEW NEW EXHIBIT LILST FROM DEFENDANTS AND DOCUMENTS REFERENCED THEREIN (0.5); EMAIL C. LABIN REGARDING SAME (0.1); CONTINUE OUTLINING DIRECT EXAMINATION OF E. PERRY (3.7).	4.8	\$3,024.00
9/7/2022	MH	ATTEND TO ORDER AND OPINION DENYING SJ/SANCTIONS, ORDER ON TRIAL, ORDER DENYING DEFENDANTS REQUEST FOR ADJOURNMENT, CORRESPONDENCE TO COURT, ORDER SETTING NEW TRIAL DEADLINES, AND TRIAL EXS.	0.7	\$164.50
9/8/2022	HDR	REVIEW COURT RULING REGARDING MOTIONS IN LIMINE AND MINUTES REGARDING 9/7/22 PROCEEDINGS.	0.1	\$53.00
9/8/2022	TJO	CONTINUE PREPARING FOR TRIAL.	5.9	\$3,717.00
9/8/2022	MH	ATTEND TO ORDER GRANTING DEFENDANTS REQUEST TO FILE EXCESS PAGES, CORRESPONDENCE TO COURT REGARDING MOTIONS IN LIMINE, AND ORDER DISMISSING MOTION IN LIMINE AS MOOT.	0.3	\$70.50
9/9/2022	HDR	REVIEW FILING W/R/T TO DEFS MOTION TO STAY.	0.1	\$53.00
9/9/2022	TJO	TELEPHONE CONFERENCE WITH J. ROSEN VALVERDE (0.4); CONTINUE PREPARING FOR TRIAL REGARDING REVISE OUTLINES TO PERRY AND MARVIN DIRECT EXAMS (5.3).	5.7	\$3,591.00
9/9/2022	GWB	LEGAL RESEARCH REGARDING APPEALS UNDER FRCP 23(F) AND MOTIONS FOR SANCTIONS.	0.8	\$356.00
9/9/2022	MH	ATTEND TO MOTION IN LIMINE ORDER AND STAMP TRIAL EXHIBITS.	0.3	\$70.50

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9/12/2022	TJO	REVIEW EMAIL FROM L. FICHERA (0.1); REVIEW CORRESPONDENCE AND EXHIBITS RECIEVED FROM C. LABIN (0.4); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING TRIAL PREP (0.2); EMAIL E. PERRY REGARDING SCHEDULING ADDITIONAL PREP SESSION (0.1); EMAIL ZOOM LINK TO CO-COUNSEL FOR PERRY PREP SESSION (0.1); EMAIL E. MARVIN REGARDING SCHEDULING PREP SESSION (0.1); CONTINUE PREPARING FOR TRIAL (5.6).	6.6	\$4,158.00
9/12/2022	MH	ATTEND TO MOTION TO STAY/SUPPORTING PAPERS AND LABIN LETTER TO COURT REGARDING MOTION TO STAY SCHEDULE.	0.3	\$70.50
9/13/2022	HDR	REVIEW AND ANALYZE NJDOE MOTION TO STAY.	0.5	\$265.00
9/13/2022	HDR	REVIEW/ANALYZE LETTER FROM J. RUE TO THE COURT.	0.1	\$53.00
9/13/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN (0.2); TELEPHONE CONFERENCE WITH G. LITTLE (0.2); REVIEW J. RUE CORRESPONDENCE TO COURT (0.1); EXCHANGE EMAILS WITH J. RUE REGARDING LETTER TO JUDGE HILLMAN (0.3); REVIEW DEPOSITION TRANSCRIPTS FOR C. REISMAN REGARDING OPPOSITION TO MOTION TO STAY (0.8); CONTINUE PREPARING FOR TRIAL (6.0).	7.6	\$4,788.00
9/13/2022	MH	ATTEND TO TRIAL EXHIBITS.	0.1	\$23.50
9/14/2022	HDR	REVIEW CORRESPONDENE REGARDING HEARING WITH COURT.	0.1	\$53.00
9/14/2022	HDR	REVIEW/ANALYZE COURT ORDER REGARDING BIFURCATION.	0.1	\$53.00
9/14/2022	TJO	ZOOM CONFERENCE WITH CO-COUNSEL REGARDING OPPOSITION TO MOTION TO STAY (0.4); REVIEW DEFENDANTS' MOTION FOR A STAY (0.7); BEGIN REVISING PORTION OF OPPOSITION BRIEF RELATING TO REQUEST FOR STAY FORWARDED BY C. REISMAN (7.9); EMAIL DRAFT OF BRIEF TO J. WASSERMAN (0.1); REVIEW AND REVISE J. WASSERMAN'S EDITS TO BRIEF (0.8).	9.9	\$6,237.00
9/14/2022	GWB	ATTEND TO EMAILS WITH GREG LITTLE REGARDING TRIAL NOTES.	0.2	\$89.00
9/14/2022	MH	ATTEND TO RUE LETTER TO COURT.	0.1	\$23.50
9/14/2022	MH	ATTEND TO ORDER ON BIFURCATION.	0.1	\$23.50
9/15/2022	HDR	RECEIVE/REVIEW PLTFFS OPPOSITION TO DEFS MOTION TO STAY.	0.1	\$53.00
9/15/2022	TJO	CONTINUE PREPARING FOR TRIAL.	5.6	\$3,528.00
9/16/2022	TJO	PREPARE FOR PREP SESSION WITH B. MARVIN (0.5); PREPARE B. MARVIN (3.1); REVISE MARVIN OUTLINE (1.6); CONTINUE REVISING MOSCOWITZ OUTLINE (2.3); REVIEW EMAIL FROM C. LABIN REGARDING WITNESS LIST (0.1); EMAIL C. LABIN REGARDING SAME (0.1).	7.7	\$4,851.00

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9/16/2022	MH	ATTEND TO OPPOSITION TO MOTION TO STAY AND TRIAL EXHIBITS.	0.3	\$70.50
9/17/2022	TJO	REVIEW AND COMMENT ON DRAFT LETTER TO JUDGE HILLMAN (1.0); EXCHANGE MULTIPLE EMAILS WITH J. RUE REGARDING SAME (0.6).	1.6	\$1,008.00
9/18/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE AND C. REISMAN REGARDING LETTER TO JUDGE HILLMAN.	0.3	\$189.00
9/19/2022	HDR	RECEIVE AND REVIEW FILING BY NJDOE W/R/T BIFURCATION AND SEVERANCE. REVIEW CORRESPONDENCE FROM CO COUNSEL REGARDING SAME. MTG WITH TJO W/R/T BIFURCATION AND SEVERANCE.	0.4	\$212.00
9/19/2022	TJO	REVIEW CORRESPONDENCE FILED BY J. RUE WITH COURT (0.2); REVIEW CORRESPONDENCE FILED BY C. LABIN WITH COURT (0.3); REVIEW EMAIL FROM JUDGE HILMAN'S DEPUTY (0.1); PARTICPATE IN ZOOM CONFERENCE WITH G. LITTLE TO PREPARE J. ROSEN VALVERDE TO TESTIFY (2.0); PARTICPATE IN ZOOM CONFERENCE WITH CO-COUNSEL REGARDING ARGUMENT PREPARATION (0.3); REVIEW C. ANTHONY DEPOSITION TRANSCRIPT AND EMAIL TO J. RUE (0.3); REVIEW DEFENDANTS ADDITIONAL EXHIBITS TO DETERMINE WHICH ONES PLAINTIFFS WILL STIPULATE TOO (0.6); PREPARE STIPULATED EXHIBIT LISTS FOR SUBMITTAL TO COURT (1.6); PARTICIPATE IN HEARING WITH COURT (1.2); CONFER WITH CO-COUNSEL VIA ZOOM REGARDING POST HEARING DISCUSSION (0.4); EMAIL C. LABIN REGARDING STIPULATED EXHIBIT LIST (0.2); DRAFT LETTER TO JUDGE HILLMAN REGARDING SAME (0.2).	7.4	\$4,662.00
9/19/2022	GWB	ATTEND ZOOM CALL WITH TJO AND G. LITTLE TO PREPARE J. ROSEN TO TESTIFY.	2.0	\$890.00
9/19/2022	MH	ATTEND TO LETTERS TO COURT FROM RUE AND LABIN.	0.2	\$47.00
9/20/2022	HDR	RECEIVE AND REVIEW COURT MINUTES AND TRIAL SCHEDULE.	0.1	\$53.00
9/20/2022	HDR	RECEIVE/REVIEW ORDER OF COURT REGARDING 30B6 DEPOSITION OF NJDOE REGARDING TRACKING SOFTWARE.	0.1	\$53.00
9/20/2022	TJO	REVISE OUTLINE OF MOSCOWITZ DIRECT EXAMINATION.	7.6	\$4,788.00
9/20/2022	GWB	MEET WITH TJO TO DISCUSS CASE STATUS, ROLE AT TRIAL W/R/T PRESENTING EXHIBITS USING TRIAL DIRECTOR PROGRAM, AND WITNESS OUTLINES AND EXHIBITS REFERENCED THEREIN.	1.8	\$801.00
9/20/2022	MH	ATTEND TO CALLS/EMAILS WITH VENDORS REGARDING AVAILABILITY OF SERVICES FOR UPCOMING TRIAL.	0.8	\$188.00
9/21/2022	HDR	CORRESP WITH TEAM REGARDING POTENTIAL MEDIATOR J. SCHNEIDER.	0.2	\$106.00

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SERVICES

Date	Person	Description of Services	Hours	Amount
9/21/2022	TJO	PREPARE FOR MEETING WITH E. PERRY (0.4); PREPARE E. PERRY FOR TRIAL (2.6); CONTINUE TRIAL PREPARATION (5.4).	8.4	\$5,292.00
9/21/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR E. PERRY AND NOTE EXHIBITS TO BE PRESENTED USING TRIAL DIRECTOR SOFTWARE.	3.0	\$1,335.00
9/21/2022	GWB	ATTEND M.M./K.M. MEETING.	0.4	\$178.00
9/21/2022	GWB	REVISE AND PREPARE MARVIN WITNESS EXHIBIT FOLDER IN TRIAL DIRECTOR SOFETWARE FOR USE AT TRIAL.	1.7	\$756.50
9/21/2022	GWB	EDIT AND PREPARE PERRY WITNESS EXHIBIT FOLDER IN TRIAL DIRECTOR SOFTWARE FOR USE AT TRIAL.	1.6	\$712.00
9/21/2022	MH	ATTEND TO ORDER REGARDING DEFENDANTS 30(B)(6) DEPO.	0.1	\$23.50
9/21/2022	MH	ATTEND TO FOLLOW-UP WITH FOUR VENDORS REGARDING AVAILABILITY OF TRIAL SUPPORT SERVICES AND LOGISTICS FOR THE SAME.	1.3	\$305.50
9/22/2022	HDR	CONDUCT RESEARCH REGARDING PROPOSED MEDIATOR JOEL SCHNEIDER.	0.2	\$106.00
9/22/2022	TJO	EXCHANGE EMAILS WITH C. LABIN REGARDING EXHIBIT D-82 (0.3); ZOOM CONFERENCE WITH TRANSPERFECT (0.7); CONTINUE TRIAL PREPARATION (5.8).	6.8	\$4,284.00
9/22/2022	GWB	ATTEND CALL WITH VERITEXT REGARDING TRIAL TECH TEAM.	0.5	\$222.50
9/22/2022	MH	ATTEND TO CALLS WITH TRANSPERFECT REGARDING TRIAL PREPARATION/LOGISTICS AND FOLLOW-UP WITH G. BUEHNING ON THE SAME.	1.1	\$258.50
9/23/2022	HDR	RECEIVE/REVIEW CORRESP REGARDING NJDOE 30B6 DEPOSITION.	0.1	\$53.00
9/23/2022	HDR	REVIEW CORRESPONDENCE RELATING TO NJDOE'S REQUEST FOR A STAY.	0.1	\$53.00
9/23/2022	TJO	PREPARE FOR ZOOM MEETING WITH CO-COUNSEL (0.4); PARTICPATE IN ZOOM MEETING WITH CO-COUNSEL REGARDING TRIAL STRATEGY (1.6); PREPARE B. MARVIN (2.0); PREPARE J. ROSEN VALVERDE (2.6); CONTINUE PREPARING FOR TRIAL (0.2).	6.8	\$4,284.00
9/23/2022	GWB	ATTEND TEAM MEETING FOR PRACTICE OF OPENING STATEMENT AND NOTE DEMONSTRATIVES TO BE PRESENTED DURING OPENING.	1.5	\$667.50
9/23/2022	GWB	ATTEND MARVIN WITNESS PREPARATION SESSION AND NOTE EXHIBITS TO BE PRESENTED AT TRIAL USING TRIAL DIRECTOR SOFTWARE.	2.5	\$1,112.50
9/23/2022	GWB	ATTEND J. ROSEN WITNESS PREPARATION SESSION AND NOTE EXHIBITS TO BE PRESENTED AT TRIAL USING TRIAL DIRECTOR SOFTWARE.	2.7	\$1,201.50

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9/23/2022	MH	ATTEND TO REVIEW OF DEPOSITION TRANSCRIPTS AND CONTACT VENDORS REGARDING LOAD FILES FOR TRIAL PREPARATION AND ADD FILES TO BOX FOR TRIAL DIRECTOR.	1.1	\$258.50
9/24/2022	TJO	REVISE SANDERS OUTLINE OF DIRECT TESTIMONY.	3.4	\$2,142.00
9/25/2022	TJO	DRAFT OUTLINE OF DIRECT TESTIMONY OF C. ANTHONY (3.6); REVISE MOSCOWITZ DIRECT EXAM OUTLINE (0.5).	4.1	\$2,583.00
9/26/2022	HDR	RECEIVE AND REVIEW ORDER REGARDING LEAVE TO APPEAL TO 3D CIRCUIT CT OF APPEALS.	0.1	\$53.00
9/26/2022	TJO	ZOOM CONFERENCE WITH G. LITTLE (1.7); EMAIL C. LABIN (0.1); EMAIL S. RICCI (0.1); CONFER WITH ASSOC. (GB) REGARDING DIRECT EXAM OF SANDERS AND POINTS TO HIGHLIGHT WITH TECHNOLOGY (2.2); BEGIN REVIEWING WORTHINGTON DEPOSITION TRANSCRIPT REGARDING TRIAL PREPARATION (1.5).	5.6	\$3,528.00
9/26/2022	GWB	REVIEW SANDERS OUTLINE AND EXHIBITS TO BE PRESENTED WITH TRIAL DIRECTOR SOFTWARE WITH TJO.	2.2	\$979.00
9/26/2022	MH	ATTEND TO CORRESPONDENCE TO COURT AND ORDER.	0.3	\$70.50
9/27/2022	HDR	REVIEW AND ANALYZE J. RUE LTR TO THE COURT REGARDING ADJOURNMENT.	0.1	\$53.00
9/27/2022	HDR	CONDUCT RESEARCH REGARDING AMENDMENT TO CONFORM TO TRIAL EVIDENCE.	1.0	\$530.00
9/27/2022	HDR	REVIEW/ANALYZE NJDOE MOTION FOR STAY.	0.3	\$159.00
9/27/2022	TJO	CONTINUE REVIEWING WORTHINGTON DEPOSITION TRANSCRIPT (0.9); ZOOM CONFERENCE WITH G. LITTLE AND G. BUEHNING REGARDING TRIAL PREPARATION (1.9); MEET WITH ASSOC. G. BUEHNING REGARDING MOSCOWITZ DIRECT EXAM AND DEMONSTRATIVES (1.3); CONTINUE TRIAL PREPARATION (4.2).	8.3	\$5,229.00
9/27/2022	GWB	PREPARE SANDERS TRIAL EXHIBIT FOLDER FOR TRIALDIRECTOR.	2.3	\$1,023.50
9/27/2022	GWB	REVIEW EXHIBITS FOR SANDERS AND MOSCOWITZ TESTIMONY FOR USE IN TRIAL DIRECTOR.	2.9	\$1,290.50
9/27/2022	MH	ATTEND TO CORRESPONDENCE TO COURT.	0.1	\$23.50
9/28/2022	HDR	REVIEW/ANALYZE OF NOTICE OF INTERLOC APPEAL.	0.1	\$53.00
9/28/2022	HDR	RECEIVE AND REVIEW ORDER ADJOURNING TRIAL BY 30 DAYS.	0.1	\$53.00
9/28/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE (0.2); TELEPHONE CONFERENCE WITH G. LITTLE (0.2); TELEPHONE CONFERENCE WITH C. REISMAN (0.2).	0.6	\$378.00
9/28/2022	MH	ATTEND TO LETTERS TO COURT, ADJOURNMENT REQUEST AND ORDER DELAYING TRIAL TO NOVEMBER 7TH.	0.4	\$94.00

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9/29/2022	HDR	RECEIVE/REVIEW LTR FROM D. SOUTER TO COURT REGARDING DOE DUE PROCESS DATABASE.	0.1	\$53.00
9/29/2022	HDR	REVIEW COURT ORDER REGARDING MOTION TO STAY.	0.1	\$53.00
9/29/2022	TJO	TELEPHONE CONFERENCE WITH J. RUE (0.1); REVIEW AND COMMENT ON LETTER TO THURSTON (0.4).	0.5	\$315.00
9/29/2022	GWB	REVIEW SANDERS WITNESS OUTLINE AND EXHIBITS FOR USE IN TRIAL DIRECTOR SOFTWARE.	2.1	\$934.50
9/29/2022	MH	ATTEND TO INTERLOCUTORY APPEAL, THIRD CIRCUIT ORDER, NOTICE OF THIRD CIRCUIT APPEAL, WITHDRAWAL OF MOTION TO STAY, DNJ ORDER DISMISSING MOTION TO STAY AS MOOT AND LOAD FILES OF DEPOSITION TRANSCRIPT FOR TRIAL DIRECTOR SOFTWARE REGARDING TRIAL PREPARATION.	0.9	\$211.50
9/30/2022	HDR	RECEIVE/REVIEW TEXT ORDER REGARDING NJDOE 30B6 DEPOSITION REGARDING RECORDS.	0.1	\$53.00
9/30/2022	TJO	REVIEW EMAIL FROM J. RUE REGARDING RESPONSE ON COMNETS TO LETTER TO THURSTON (0.1); ZOOM CONFERENCE WITH C. REISMAN AND J. RUE REGARDING ATTORNEY FEE ALLOCATION (0.3); ZOOM CONFERENCE WITH G. LITTLE, G. BUEHNING AND K. RUE REGARDING TRIAL PREPARATION (1.5); CONITNUE TRIAL PREPARATION (0.4).	2.3	\$1,449.00
9/30/2022	GWB	ATTEND TRIAL STRATEGY MEETING WITH TJO, G. LITTLE, K. RUE.	1.5	\$667.50
9/30/2022	GWB	REVIEW MOSCOWITZ WITNESS OUTLINE AND EXHIBITS FOR USE IN TRIAL DIRECTOR SOFTWARE.	1.3	\$578.50
10/3/2022	MH	ATTEND TO CORRESPONDENCE AND ORDER.	0.2	\$47.00
10/5/2022	TJO	PARTTICIPATE IN PREP SESSION FOR SBC (1.2); EMAIL ZOOM LINK FOR FOLLOW UP PREP SESSION FOR SBC (0.1); FORWARD OUTLINES OF DIRECT EXAM OF E.M. AND E.P. TO K. RUE (0.1); EXCHANGE MULTIPLE EMAILS WITH G. LITTLE REGARDING SBC PREP SESSION (0.2).	1.7	\$1,071.00
10/5/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR SBC.	1.4	\$623.00
10/6/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SBC PREP (0.2); CONTINUE TRIAL PREPARATION REGARDING OUTLINE CROSS-EXAMINATION POINTS FOR SCHOOL BOARD ATTORNEYS (0.9).	1.1	\$693.00
10/6/2022	GWB	REVIEW AND ANALYZE DUE PROCESS TIMELINES PREPARED FOR TRIAL.	0.9	\$400.50
10/7/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE (0.1); REVISE DRAFT LETTER BY JR TO JUDGE HILLMAN (0.9); CONTINUE TRIAL PREPARATION (0.6).	1.6	\$1,008.00

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10/10/2022	TJO	PREPARE FOR SBC PREP SESSION (0.2); REVIEW EMAIL FROM K. RUE REGARDING ADJOURNING SESSION (0.1); TELEPHONE CONFERENCE WITH G. LITTLE (0.3); REVIEW MOSCOWITZ DEPOSITION TRANSCRIPT AND EMAIL G. LITTLE REGARDING BEST QUOTES FROM THAT DEPOSITION FOR INCLUSION IN OPENING STATEMENT (1.2); CONTINUE DRAFTING OUTLINE OF WORTHINGTON DIRECT EXAM (1.4); BEGIN REVIEWING DOCUMENTS ON A.S. CASE AND OUTLINING CROSS EXAM POINTS FOR LUNDQUIST (3.8).	7.0	\$4,410.00
10/10/2022	GWB	ATTEND MEETING WITH TJO AND G. LITTLE TO DISCUSS TRIAL STRATEGY.	0.9	\$400.50
10/10/2022	GWB	REVIEW AND PULL TRIAL EXHIBITS FOR G. LITTLE'S OPENING POWERPOINT PRESENTATION.	2.4	\$1,068.00
10/10/2022	GWB	ATTEND CALL WITH G. LITTLE AND VERTITEXT REGARDING OPENING POWERPOINT PRESENTATION.	1.8	\$801.00
10/10/2022	MH	ATTEND TO CALL WITH G. BUEHRING, REVIEW DOCKET/ELECTRONIC DATABASE AND FORWARD DOCS FOR TRIAL PREPARATION.	0.8	\$188.00
10/11/2022	TJO	CONTINUE OUTLINING CROSS EXAMINATION POINTS FOR LUNDQUIST (1.3); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SETTLEMENT STRATEGY (0.2); REVIEW DOCKETS FOR OTHER CASES FILED AGAINST NJDOE AND FOWRARD TO C. REISMAN (0.6); TELEPHONE CONFERENCE WITH C. REISMAN AND G. LITTLE REGARDING SAME (0.3); EMAIL K. RUE REGARDING MUCCIOLO CROSS (0.1); REVIEW CASE FILE AND OUTLINE CROSS POINTS FOR BUTLER (4.2).	6.7	\$4,221.00
10/11/2022	GWB	TELEPHONE CALL WITH G. LITTLE TO EDIT AND REVISE OPENING PRESENTATION POWER POINT.	3.5	\$1,557.50
10/12/2022	TJO	VERIFY AND REVISE DEMONSTRATIVE TIMELINES FOR E.M. AND E.P. CASES (1.2); PARTICIPATE IN ZOOM CONFERENCE AND PROVIDE COMMENTS ON POWERPOINT FOR OPENING (1.6); PREPARE DEMONSTRATIVE TIMELINE FOR D.O. CASE TO USE WITH BUTLER CROSS (1.1); BEGIN REVISING TIMELINE FOR A.S. CASE TO USE WITH LUNDQUIST CROSS (1.5).	5.4	\$3,402.00
10/12/2022	GWB	EDIT AND REVISE OPENING POWER POINT PRESENTATION.	0.9	\$400.50
10/12/2022	GWB	ATTEND MOCK OPENING PRESENTATION.	1.9	\$845.50
10/13/2022	TJO	CONTINUE DRAFTING OUTLINE OF CROSS EXAMINATION FOR LUNDQUIST (1.2); PREPARE DEMONSTRATIVE TIMELINES FOR M.M. AND S.B.C. CASES (2.3); BEGIN DRAFTING OUTLINE OF CROSS EXAM FOR BARTO (2.0).	5.5	\$3,465.00

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10/14/2022	TJO	REVIEW AND COMMENT ON DEMONSTRATIVES FOR EP DP PETITIONS (0.4); REVIEW AND COMMENT ON DEMONSTRATIVE FOR ES PETITION (0.3); BEGIN OUTLINING CROSS EXAMINATION POINTS FOR MUCIOLO (5.8).	6.5	\$4,095.00
10/14/2022	GWB	EDIT AND REVISE DEMONSTRATIVE TIMELINES FOR OPENING POWER POINT.	2.0	\$890.00
10/17/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE REGARDING MEDIATION UPDATE (0.2); REVIEW DRAFT CONSENT ORDER AND COMMENT ON SAME (0.3).	0.5	\$315.00
10/18/2022	TJO	EMAIL PROFORMA TO J. RUE (0.2); TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SETTLEMENT ISSUES (0.3); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.2).	0.7	\$441.00
10/19/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SETTLEMENT STRATEGY (0.3); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SAME (0.6).	0.9	\$567.00
10/20/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN REGARDING SETTLEMENT CONFERENCE STRATEGY (0.2); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING RESULTS OF SETTLEMENT CONFERENCE (0.2); EXCHANGE EMAILS WITH CO-COUNSEL REGARDING AVAILABILITY FOR CONFERENCE CALL (0.1); PARTICIPATE IN CONFERENCE CALL WITH CO-COUNSEL (0.2).	0.7	\$441.00
10/21/2022	HDR	RECEIVE AND REVIEW CORRESP FROM NJDOE REGARDING REINSTATEMENT OF STAY.	0.1	\$53.00
10/21/2022	TJO	UPDATE DEMONSTRATIVES FOR EP, MM, SBC, AND AS CASES AND BEGIN PREPARING TIME LINE FOR SS CASE.	5.7	\$3,591.00
10/23/2022	HDR	REVIEW AND ANALYZE PLTFF LETTER TO COURT REGARDING DOE APPLIC FOR REINSTATEMENT.	0.1	\$53.00
10/24/2022	TJO	CONTINUE PREPARING DEMONSTRATIVE TIMELINE FOR SS CASE (1.2); PREPARE DEMONSTRATIVE TIMELINE FOR YHS CASE (2.2); PARTICIPATE IN ZOOM CONFERENCE WITH CO-COUNSEL REGARDING SETTLEMENT STRATEGY (1.3); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING TRIAL PREPARATION (0.1).	4.8	\$3,024.00
10/25/2022	HDR	RECEIVE AND REVIEW CORRESP FROM NJDOE TO COURT REGARDING MOTION TO STAY.	0.1	\$53.00
10/25/2022	TJO	REVISE DEMONSTRATIVES FOR A.S., SBC, MM, AND YHS CASES (2.4); REVISE CROSS EXAMINATION OUTLINES FOR BARTO, BUTLER AND LUNDQUIST (4.9); TELEPHONE CONFERENCE WITH G. LITTLE REGARDING SETTLEMENT DISCUSSIONS (0.3); EXCHANGE EMAILS WITH K. RUE REGARDING TRIAL PREPARATION (0.1); REVIEW LETTER FROM C. LABIN TO JUDGE HILLMAN (0.1).	7.8	\$4,914.00
10/25/2022	GWB	EDIT AND REVISE OPENING STATEMENT POWER POINT.	0.6	\$267.00

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10/25/2022	GWB	PREPARE AND REVIEW BUTLER WITNESS EXHIBIT FOLDER ON TRIAL DIRECTOR.	1.0	\$445.00
10/25/2022	GWB	PREPARE AND REVIEW BARTO WITNESS EXHIBIT FOLDER ON TRIAL DIRECTOR.	1.1	\$489.50
10/26/2022	HDR	MTG WITH T. O'LEARY TO DISCUSS TRIAL STATUS AND MEDIATION.	0.1	\$53.00
10/26/2022	HDR	REVIEW COURT NOTICE REGARDING 9.12.12 CONF WITH COURT.	0.1	\$53.00
10/26/2022	HDR	RECEIVE AND REVIEW TEXT ORDER REGARDING MOTION FOR STAY AND COURT CONF, MTG WITH T. O'LEARY REGARDING SAME.	0.2	\$106.00
10/26/2022	TJO	CONTINUE OUTLING LUNDQUIST CROSS EXAM (1.2); BEGIN OUTLINING MUCIOLO CROSS-EXAMINATION (4.5).	5.7	\$3,591.00
10/26/2022	GWB	PREPARE AND REVIEW LUNDQUIST WITNESS FOLDER ON TRIAL DIRECTOR.	0.9	\$400.50
10/26/2022	GWB	DISCUSS CASES STATUS AND STRATEGY WITH TJO AND G. LITTLE.	0.5	\$222.50
10/26/2022	MH	ATTEND TO ORDER DENYING STAY AND SETTING CONFERENCE.	0.1	\$23.50
10/27/2022	TJO	OUTLINE DIRECT EXAM OF SBC.	6.4	\$4,032.00
10/27/2022	MH	ATTEND TO CORRESPONDENCE TO COURT.	0.1	\$23.50
10/28/2022	TJO	BEGIN OUTLINING DIRECT EXAMINATION OF A. SWEETEN.	4.8	\$3,024.00
11/1/2022	HDR	REVIEW JOINT TRIAL ADJOURNMENT REQUEST.	0.1	\$53.00
11/1/2022	TJO	REVIEW LETTER FROM C. LABIN FILED WITH COURT.	0.1	\$63.00
11/2/2022	HDR	REVIEW COURT ORDER REGARDING TRIAL DATE.	0.1	\$53.00
11/2/2022	TJO	TRAVEL TO CAMDEN FROM NEWARK (1.5); ATTEND COURT APPEARANCE AND WORK WITH TECHNOLOGY IN COURT ROOM AFTER APPEARANCE IN PREPARATION FOR TRIAL (2.2); TRAVEL FROM CAMDEN TO NEWARK (1.6).	5.3	\$3,339.00
11/2/2022	GWB	TRAVEL TO CAMDEN FROM NEWARK (1.5); ATTEND COURT APPEARANCE AND WORK WITH TECHNOLOGY IN COURT ROOM AFTER APPEARANCE IN PREPARATION FOR TRIAL (2.2); TRAVEL FROM CAMDEN TO NEWARK (1.6).	5.3	\$2,358.50
11/2/2022	MH	ATTEND TO ORDER REGARDING SCHEDULE.	0.1	\$23.50
11/5/2022	TJO	REVIEW DRAFT LETTER PREPARED BY J. RUE (0.2); TELEPHONE CONFERENCE WITH C. REISMAN AND G. LITTLE REGARDING DRAFT LETTER (0.2).	0.4	\$252.00
11/7/2022	TJO	TELEPHONE CONFERENCE WITH CO-COUNSEL RE: MEDIATION STRATEGY (0.6); BEGIN REVIEWING PROFORMA IN PREPARATION FOR FEE APPLICATION (2.1).	2.7	\$1,701.00

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11/9/2022	TJO	CONTINUE REVIEWING PROFORMA IN PREPARATION FOR FEE APPLICATION.	3.4	\$2,142.00
11/10/2022	TJO	CONTINUE REVIEWING PROFORMA IN PREPARATION FOR FEE APPLICATION (0.7); TELEPHONE CONFERENCE WITH J. RUE RE: SETTLEMENT STRATEGY (0.5).	1.2	\$756.00
11/11/2022	TJO	CONTINUE REVIEWING PROFORMA IN PREPARATION FOR FEE APPLICATION.	5.3	\$3,339.00
11/14/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN RE: SETTLEMENT DISCUSSIONS.	0.2	\$126.00
11/15/2022	TJO	ZOOM CONFERENCE WITH J. RUE RE: SETTLEMENT ISSUES (1.0); TELEPHONE CONFERENCE WITH C. REISMAN RE: SAME (0.4).	1.4	\$882.00
11/16/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE RE: MEETING WITH STATE AND TRIAL PREPARATION (0.4); TELEPHONE CONFERENCE WITH C. REISMAN RE: MEETING WITH STATE (0.1).	0.5	\$315.00
11/17/2022	TJO	CONTINUE TRIAL PREPARATION.	2.2	\$1,386.00
11/18/2022	TJO	ZOOM CONFERENCE WITH CO-COUNSEL REGARDING FEE APPLICATION (0.5); TELEPHONE CONFERENCE WITH G. LITTLE RE: SETTLEMENT AND TRIAL PREPARATION (0.3).	0.8	\$504.00
11/27/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE RE: MEDIATION STRATEGY.	0.5	\$315.00
11/28/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE RE: UPDATE ON MEDIATION SESSION AND STRATEGY TO RESOLVE ATTORNEY FEE CLAIM (0.5); TELEPHONE CONFERENCE WITH C. REISMAN RE: STRATEGY TO RSOLVE ATTORNEY FEE CLAIM AS PART OF SETTLEMENT (0.3).	0.8	\$504.00
11/29/2022	TJO	REVIEW EMAIL FROM J. RUE REGARDING SETTLEMENT STRATEGY TO RESOLVE ATTORNEY FEE CLAIM AND RESPOND (0.1); TELEPHONE CONFERENCE WITH J. RUE RE: SAME (0.2); TELEPHONE CONFERENCE WITH C. REISMAN RE: SAME (0.4); CONFERENCE CALL WITH CO-COUNSEL RE: SETTLEMENT DISCUSSIONS ABOUT RELATED CLAIMS FILED BY THURSTON (0.4); EXCHANGE EMAILS WITH G. LITTLE RE: SCHEDULING TRIAL PREP SESSION (0.2); CONTINUE PREPARING FOR TRIAL (0.6).	1.9	\$1,197.00
11/29/2022	GWB	DISCUSS CASE STATUS AND TRIAL STRATEGY WITH TJO.	0.3	\$133.50
11/30/2022	TJO	TELEPHONE CONFERENCE WITH G. LITTLE RE: STRATEGY TO RESOLVE ATTORNEY FEE CLAIM VIA SETTLEMENT (0.5); TELEPHONE CONFERENCE WITH J. RUE RE: LIST OF KEY DISCOVERY EVENTS (0.1); REVIEW HISTORY OF DISCOVERY AND PREPARE 4 PAGE MEMO TO J. RUE IDENTIFYING KEY DISCOVERY EVENTS IN TIMELINE FASHION (2.8).	3.4	\$2,142.00

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12/1/2022	TJO	ZOOM CONFERENCE WITH G. LITTLE AND ASSOC. (GB) REGARDING TRIAL PREPARATION (1.2); SCHEDULE FOLLOW-UP ZOOM CONFERENCE AND EMAIL LINK TO G. LITTLE AND ASSOC. (GB) (0.1); REVIEW EMAIL FROM D. DWYER REGARDING NEW TRANSMITTAL FORM USED BY NJDOE (0.1); TELEPHONE CONFERENCE WITH D. DWYER REGARDING TRANSMITTAL FORM AND CURRENT STATUS OF CASE (0.2).	1.6	\$1,008.00
12/1/2022	GWB	TELEPHONE CALL WITH TJO AND G. LITTLE REGARDING TRIAL PREPARATION AND STRATEGY.	1.3	\$578.50
12/2/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN REGARDING MOTION PRACTICE BEFORE THIRD CIRCUIT (0.4); REVIEW FILE AND PREPARE DEMONSTRATIVE TIMELINE FOR D.O. CASE (3.1); REVIEW FILE AND PREPARE DEMONSTRATIVE TIMELINE FOR C.P. CASE (4.3).	7.8	\$4,914.00
12/5/2022	HDR	REVIEW CORRESPOND FROM J. RUE TO COURT REGARDING CLASS ACTION NOTICE.	0.1	\$53.00
12/5/2022	HDR	MEETING WITH TJO REGARDING UPDATE/STATUS REGARDING TRIAL AND MEDIATION.	0.1	\$53.00
12/5/2022	TJO	CONTINUE REVIEWING DOCUMENTS RELATING TO CP CASE AND PREPARING TIMELINE IN PREPARATION FOR TRIAL (4.3); BEGIN REVIEWING DEPOSITION OF IN PREPARATION FOR TRIAL (1.8).	6.1	\$3,843.00
12/5/2022	GWB	ATTEND MEETING WITH TJO AND G. LITTLE REGARDING TRIAL PREPARATION AND STRATEGY.	0.6	\$267.00
12/6/2022	TJO	CONTINUE REVIEWING DEPOSITION OF CP IN PREPARATION FOR TRIAL (1.4); ZOOM CONFERENCE WITH G. LITTLE AND G. BUEHNING RE: REVIEW OF DRAFT TIMELINES FOR DO AND CP CASES AND REVISIONS TO SAME (2.8); REVISE TIMELINES FOR DO AND CP CASES (3.5); EMAIL TIMELINES FOR DO AND CP CASES TO GRAPHICS CONSULTANT (0.1); REVIEW CORRESPONDENCE FROM C. LABIN TO COURT (0.1).	7.9	\$4,977.00
12/6/2022	GWB	TELEPHONE CALL WITH TJO AND G. LITTLE TO DISCUSS TRIAL STRATEGY.	2.8	\$1,246.00
12/7/2022	TJO	CONTINUE REVIEW OF PAREDES DEPOSITION TRANSCRIPT IN PREPRATION FOR TRIAL (1.3); BEGIN REVIEW OF OSBORN DEPOSITION TRANSCRIPT IN PREPARATION FOR TRIAL (3.1); REVIEW EMAIL FROM GRAPHICS CONSULTANT (0.1); REVISE TIMELINES FOR CP AND DO CASES AND WORK WITH GRAPHICS CONSULTANT TO PREPARE DEMONSTRATIVES FOR CP AND DO CASES (3.3).	7.8	\$4,914.00
12/7/2022	MH	ATTEND TO CORRESPONDENCE FROM J. RUE AND DAG.	0.1	\$23.50

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12/8/2022	TJO	CONTINUE REVIEW OF OSBORN DEPOSITION TRANSCRIPT IN PREPARATION FOR TRIAL (0.7); PREPARE TIMELINE FOR GILLIAM CASE AND EMAIL TIMELINE TO GRAPHICS CONSULTANT (1.0); REVIEW GILLIAM DEPOSITION TRANSCRIPT IN PREPARATION FOR TRIAL (1.5); ZOOM CONFERENCE WITH G. LITTLE AND G. BUEHNING RE: REVIEW OF CP AND DO DEMONSTRATIVES AND REVISIONS TO OTHER DEMONSTRATIVES AND REVIEW OF LG TIMELINE AND WHETHER TO CALL HER AS A WITNESS ON DIRECT CASE (2.0); TELEPHONE CONFERENCE WITH J. ROSEN VALVERDE RE: TRIAL PREPARATION AND CONTACT INFO FOR LG (0.2).	5.4	\$3,402.00
12/8/2022	GWB	REVIEW PLAINTIFF TIMELINE DEMONSTRATIVES FOR TRIAL.	0.6	\$267.00
12/8/2022	GWB	ATTEND CALL WITH TJO AND G. LITTLE TO DISCUSS TRIAL STRATEGY.	1.5	\$667.50
12/9/2022	HDR	RECEIVE AND REVIEW PLTFFS' MOTION TO APPROVE CLASS NOTIF.	0.1	\$53.00
12/9/2022	TJO	REVIEW AND REVISE DEMONSTRATIVE TIMELINES FOR ALL 9 PLAINTIFFS.	4.3	\$2,709.00
12/12/2022	HDR	REVIEW NEF REGARDING PLAINTIFF MOTION FOR CLASS NOTICE.	0.1	\$53.00
12/12/2022	HDR	REVIEW PLAINTIFFS' MOTION REGARDING CLASS NOTICE.	0.6	\$318.00
12/12/2022	TJO	PREPARE FOR ZOOM CONFERENCE (0.2); ZOOM CONFERENCE WITH G. LITTLE AND G. BUEHNING RE: TRIAL PREPARATION (1.1); TELEPHONE CONFERENCE WITH D. DWYER RE: HISTORY OF RECENT DP PETITION PENDING IN OAL (0.5); REVIEW OAL WEBSITE TO DETERMINE NUMBER OF ALJS (0.2); EMAIL G. LITTLE RE: HISTORY OF D. DWYER'S DP PETITION AND COMPARISON OF NUMBER OF ALJS CURRENTLY AT OAL AS OPPOSED TO WHEN JUDGE MOSCOWITZ WAS DEPOSED (0.5); DOWNLOAD AND REVIEW MOTION PAPERS FILED BY J. RUE (0.2); PLACE CALL TO L. GILLIAM (0.1); SEND ZOOM LINK TO A. SWEETEN (0.1).	2.9	\$1,827.00
12/12/2022	TJO	CONTINUE PREPARING PRETRIAL ORDER.	4.5	\$2,835.00
12/12/2022	GWB	ATTEND CALL WITH TJO AND G. LITTLE TO DISCUSS CASE STATUS AND TRIAL STRATEGY.	1.1	\$489.50
12/12/2022	MH	ATTEND TO MOTION TO APPROVE PLAINTIFFS' PLAN/SUPPORTING PAPERS.	0.1	\$23.50
12/13/2022	TJO	PREPARE FOR PREPARATION SESSION WITH SBC (1.3); PREPARE FOR PREPARATION SESSION WITH A.S. (1.3); ZOOM CONFERENCE WITH ASSOC. (GB) AND SBC RE: TRIAL PREPARATION (1.8); TELEPHONE CONFERENCE WITH G. LITTLE RE: PREP SESSION WITH SBC (0.2); TELEPHONE CONFERENCE WITH L.G. RE: SCHEDULING PREP SESSION (0.1); BEGIN PREPARING FOR LG TRIAL PREPARATION SESSION (0.3).	5.0	\$3,150.00

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12/13/2022	GWB	ATTEND THE WITNESS PREPARATION SESSION FOR SHAYE CRANDOLL.	1.8	\$801.00
12/14/2022	HDR	RECEIVE AND REVIEW ORDER FROM COURT TRIAL SCHEDULE.	0.1	\$53.00
12/14/2022	TJO	EMAIL EXHIBITS TO SBC (0.2); DRAFT LETTER TO SBC RE: FORWARDING EXHIBIT BOOK (0.2); EMAIL EXHIBITS TO AS (0.2); DRAFT LETTER TO AS RE: FORWARDING EXHIBIT BOOK (0.2); ZOOM CONFERENCE WITH AS RE: TRIAL PREPARATION (2.0); ZOOM CONFERENCE WITH LG RE: TRIAL PREPARATION (1.0); REVISE SBC DIRECT EXAMINATION OUTLINE (3.2); CONTINUE DRAFTING AS DIRECT EXAMINATION OUTLINE (1.8); TELEPHONE CONFERENCE WITH G. LITTLE RE: CALL WITH MEDIATOR (0.3).	8.1	\$5,103.00
12/14/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR ADELE SWEETEN.	2.0	\$890.00
12/14/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR LATEEFAH GILLIAM.	1.0	\$445.00
12/15/2022	HDR	CORRESPOND WITH TJO REGARDING STATUS OF MATTER AND THE PENDING MEDIATION.	0.1	\$53.00
12/15/2022	TJO	TELEPHONE CONFERENCE WITH C. REISMAN RE: SETTLEMENT ISSUES (0.3); ZOOM CONFERENCE WITH YHS RE: INITIAL INTERVIEW IN CONNECTION WITH TRIAL PREPARATION (1.8); EMAIL J. RUE RE: NEED FOR FOLLOW UP ZOOM CONFERENCE WITH YHS (0.2); EMAIL EXHIBITS TO L. GILLIAM (0.1); DRAFT LETTER TO L. GILLIAM RE: FORWARDING EXHIBIT BINDER (0.2); REVISE OUTLINE OF DIRECT EXAM OF SBC (1.2); CONTINUE DRAFTING OUTLINE OF DIRECT EXAM OF AS (3.3).	7.1	\$4,473.00
12/15/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR YONATHAN HAILE-SELASSIE.	1.8	\$801.00
12/15/2022	MH	ATTEND TO NOTICE OF BENCH TRIAL.	0.1	\$23.50
12/16/2022	TJO	CONTINUE OUTLINING DIRECT EXAM OF A.S. (4.7); OUTLINE DIRECT EXAM OF L.G. (2.7); TELEPHONE CONFERENCE WITH C. REISMAN RE: SETTLEMENT ISSUES (0.3).	7.7	\$4,851.00
12/16/2022	GWB	REVIEW AND ANALYZE JUDGE HILLMAN'S SUMMARY JUDGMENT OPINION.	1.8	\$801.00
12/17/2022	TJO	PREPARE FOR ZOOM CONFERENCE WITH SBC (0.2); ZOOM CONFERENCE WITH SBC, G. LITTLE AND ASSOC. (GB) RE: PREPARATION OF WITNESS FOR TRIAL (2.5); REVISE OUTLINE OF SBC DIRECT EXAM AFTER PREPARATION SESSION (0.7).	3.4	\$2,142.00
12/17/2022	GWB	ATTEND THE WITNESS PREPARATION SESSION FOR SHAYE CRANDOLL.	2.5	\$1,112.50

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12/18/2022	TJO	EXCHANGE EMAILS WITH SBC RE: AVAILABILTY FOR ZOOM CONFERENCE (0.1); ZOOM CONFERENCE WITH SBC TO REVIEW DEMONSTRATIVE EXHIBITS TO USED DURING HER DIRECT EXAM (0.5).	0.6	\$378.00
12/19/2022	HDR	REVIEW/ANALYZE NJDOE MOTION TO STAY.	0.8	\$424.00
12/19/2022	TJO	ZOOM CONFERENCE WITH A.S. RE: TRIAL PREPRATION (2.4); ZOOM CONFERENCE WITH L.G. RE: TRIAL PREPARATION (1.0); REVISE OUTLINE OF L.G. DIRECT EXAMINATION (2.1); REVISE OULTINE OF A.S. DIRECT EXAMINATION (2.2).	7.7	\$4,851.00
12/19/2022	GWB	ATTEND THE WITNESS PREPARATION SESSION FOR ADELE SWEETEN.	2.4	\$1,068.00
12/19/2022	GWB	ATTEND THE WITNESS PREPARATION SESSION FOR GILLIAM.	1.0	\$445.00
12/20/2022	HDR	RECEIVE/REVIEW NJDOE OPPOSITION TO MOTION TO APPROVE CLASS NOTICE.	0.1	\$53.00
12/20/2022	HDR	REVIEW NOTICE FROM COURT REGARDING MOTION TO STAY.	0.1	\$53.00
12/20/2022	TJO	ZOOM CONFERENCE WITH J. RUE AND Y.H.S. RE: CONTINUATION OF INTERVIEW PRIOR TO MOCK DIRECT EXAMINATION (0.5); ZOOM CONFERENCE WITH A.S. RE: CONTINUATION OF TRIAL PREPARATION (1.2); ZOOM CONFERENCE WITH G. LITTLE AND ASSOC. (GB) RE: DISCUSSION OF MOCK DIRECT EXAM OF A.S. (0.4); CONTINUE REVISING OUTLINE OF DIRECT EXAMINATION OF A.S. (5.6); REVIEW MOTION FOR STAY FILED BY STATE (0.3).	8.1	\$5,103.00
12/20/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR ADELE SWEETEN.	1.3	\$578.50
12/20/2022	GWB	REVIEW AND ANALYZE NJDOE'S OPPOSITION TO PLAINTIFFS' MOTION TO APPROVE CLASS NOTICE AND NOTICE PLAN.	0.6	\$267.00
12/20/2022	MH	ATTEND TO MOTION TO STAY TRIAL/SUPPORTING PAPERS.	0.2	\$47.00
12/21/2022	TJO	EXCHANGE EMAILS WITH E.P. RE: SCHEDULING PREPARATION SESSION (0.2); DRAFT LETTER TO E.P. RE: FORWARDING DEMONSTRATIVE (0.2); CONTINUE REVISING OUTLINE OF DIRECT EXAM OF A.S. (7.0); TELEPHONE CONFERENCE WITH G. LITTLE RE: WITNESS ORDER AT TRIAL AND IDENTIFICATION OF INTENT TO CALL L.G. AND Y.H.S. TO TESTIFY AT TRIAL (0.2).	7.6	\$4,788.00
12/22/2022	HDR	REVIEW/ANALYZE NJDOE OPPOSITION TO PLTFF MOTION TO APPROVE CLASS NOTICE.	0.6	\$318.00
12/22/2022	TJO	DRAFT OUTLINE OF YHS DIRECT EXAMINAITON.	4.7	\$2,961.00
12/24/2022	TJO	CONDUCT MOCK DIRECT EXAMINATION OF SBC (2.6); REVIEW AND COMMENT ON BRIEF IN OPPOSITION TO STATE'S MOTION FOR A STAY OF TRIAL (0.4).	3.0	\$1,890.00

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12/26/2022	HDR	REVIEW CORRESP. FROM J. RUE TO COURT RE BRIEFING SCHEDULE RE MOTION TO STAY.	0.1	\$53.00
12/26/2022	TJO	REVIEW DEMONSTRATIVE WITH E.P. AND CONDUCT MOCK DIRECT EXAMINATION OF E.P. (2.6); TELEPHONE CONFERENCE WITH G. LITTLE RE: RESULTS OF MOCK DIRECT EXAM OF E.P. (0.1).	2.7	\$1,701.00
12/27/2022	HDR	REVIEW/ANALYZE PLTFFS REPLY TO MOTION TO APPROVE CLASS NOTICE AND NOTICE PLAN.	0.5	\$265.00
12/27/2022	TJO	PARTICIPATE IN PREPARATION OF J. ROSEN VALVERDE FOR TRIAL (2.0); REVIEW DEMONSTRATIVE WITH A.S. AND CONDUCT MOCK DIRECT EXAMINATION OF A.S. (2.7); TELEPHONE CONFERENCE WITH G. LITTLE RE: DIRECT EXAM OF A.S. (0.4); PREPARE FOR ZOOM CONFERENCE WITH Y.H.S. (0.2); REVIEW DEMONSTRATIVE WITH Y.H.S. AND CONDUCT MOCK DIRECT EXAM OF YHS (1.5); REVISE DIRECT EXAM OUTLINE OF A.S. (0.2).	7.0	\$4,410.00
12/27/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR JENNIFER ROSEN VALVERDE.	2.0	\$890.00
12/27/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR ADELE SWEETEN.	2.8	\$1,246.00
12/27/2022	GWB	ATTEND WITNESS PREPARATION SESSION FOR YONATHAN HAILE-SELASSIE.	1.5	\$667.50
12/28/2022	HDR	REVIEW PLAINTIFF CORRESPOND TO COURT REGARDING STAY OF TRIAL DATE.	0.1	\$53.00
12/28/2022	TJO	CONTINUE REVISING DIRECT EXAMINATION OUTLINES FOR YHS, LG. AND AS.	2.5	\$1,575.00
12/30/2022	HDR	RECEIVE/REVIEW ORDER GRANTING STAY OF TRIAL DATE.	0.1	\$53.00
1/3/2023	TJO	EMAIL ZOOM LINK TO G. LITTLE AND ASSOC. (GB) REGARDING TRIAL PREPARATION (0.1); CONFER WITH G. LITTLE AND ASSOC. (GB) REGARDING TRIAL PREPARATION (1.2).	1.3	\$819.00
1/3/2023	MH	ATTEND TO CORRESPONDENCE TO COURT AND REPLY IN SUPPORT OF MOTION TO APPROVE CLASS NOTICE.	0.2	\$47.00
1/5/2023	HDR	CORRESPOND WITH TJO RE STATUS OF SETTLEMENT NEGOTIATIONS.	0.1	\$53.00
1/5/2023	GWB	BEGIN TO DRAFT CHART OF DEPOSITION TESTIMONY RE FEDERAL DAYS FOR TRIAL DEMONSTRATIVE.	2.3	\$1,023.50
1/6/2023	TJO	EXCHANGE TEXT MESSAGES WITH G. LITTLE RE: DISMISSAL OF APPEAL.	0.2	\$126.00
1/8/2023	GWB	REVIEW DEPOSITION TRANSCRIPTS AND PREPARE CHART FOR FEDERAL DAY TESTIMONY.	4.1	\$1,824.50
1/9/2023	TJO	PLACE CALL TO D. GILES RE: MILLIGAN TESTIMONY.	0.2	\$126.00

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1/10/2023	TJO	LISTEN TO VOICEMAIL FROM G. LITTLE RE: TRIAL ISSUES RE: NJDOE AND OAL PRESENT PRACTICES (0.1); RESEARCH DP DECISIONS FROM LATE 2022 POSTED ONLINE (0.6); TELEPHONE CONFERENCE WITH G. LITTLE RE: RESULTS OF RESEARCH (0.2); SECOND TELEPHONE CONFERENCE WITH G. LITTLE RE: RESULTS OF RESEARCH AND TRIAL STRATEGY (0.4).	1.3	\$819.00
1/10/2023	GWB	EDIT CHART RE FEDERAL DAY TESTIMONY.	0.5	\$222.50
1/17/2023	GWB	ATTEND TELEPHONE CALL WITH G. LITTLE RE OPENING POWERPOINT PRESENTATION.	1.0	\$445.00
1/17/2023	GWB	EDIT AND REVISE OPENING POWERPOINT PRESENTATION.	0.8	\$356.00
1/18/2023	HDR	REVIEW ORDER OF THIRD CIRCUIT RE ORDER LIEU OF MANDATE.	0.1	\$53.00
1/18/2023	TJO	ZOOM CONFERENCE WITH G. LITTLE AND G. BUEHNING RE: TRIAL PREPARATION (1.7); BEGIN UPDATING AND REVISING OUTLINE OF MOSCOWITZ DIRECT EXAM (4.2); TELEPHONE CONFERENCE WITH J. ROSEN VALVERDE RE: TRIAL PREPARATION (0.1); TELEPHONE CONFERENCE WITH G. LITTLE RE: SAME (0.2).	6.2	\$3,906.00
1/18/2023	GWB	EDIT AND REVISE SLIDES TO OPENING POWERPOINT PRESENTATION.	1.1	\$489.50
1/18/2023	GWB	ATTEND MEETING WITH TJO AND G. LITTLE TO DISUCSS OPENING POWERPOINT PRESENTATION.	1.7	\$756.50
1/18/2023	MH	ATTEND TO APPELLATE ORDER DISMISSING CASE.	0.1	\$23.50
1/19/2023	TJO	CONTINUE REVISING OUTLINE OF MOSCOWITZ DIRECT EXAM IN PREPARATION FOR TRIAL.	6.1	\$3,843.00
1/20/2023	TJO	TELEPHONE CONFERENCE WITH C. REISMAN RE: STATUS OF SETTLEMENT DISCUSSIONS (0.3); REVIEW ROTA DEPOSITION TRANSCRIPTS AND NOTE KEY ADMISSIONS IN PREPARATION FOR CROSS EXAMINATION OF ROTA DURING TRIAL. (7.4).	7.7	\$4,851.00
1/23/2023	TJO	TEXT G. LITTLE RE: ADVISING OF AVAILABILITY TO CONFER FOR TRIAL PREP (0.1); SCHEDULE AND EMAIL ZOOM CONFERENCES FOR TRIAL PREP (0.2); CONTINUE REVISING DIRECT EXAMINATION OUTLINE OF MOSCOWITZ (1.6).	1.9	\$1,197.00
1/24/2023	TJO	ZOOM CONFERENCE WITH G. LITTLE AND ASSOC. (GB) RE: TRIAL PREPARATION AN POWER POINT FOR OPENING (1.2); TELEPHONE CONFERENCE WITH C. REISMAN RE: STATUS OF SETTLEMENT NEGOTIATIONS (0.4); TELEPHONE CONFERENCE WITH G. LITTLE RE: SAME (0.1); BEGIN REVIEWING STRUNK CASE FILE AND PREPARING DEMONSTRATIVE (4.2).	5.9	\$3,717.00
1/24/2023	GWB	EDIT AND REVISE TRIAL OPENING PPT.	1.2	\$534.00

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1/25/2023	TJO	ZOOM CONFERENCE WITH G. LITTLE AND ASSOC. (GB) RE: TRIAL PREPARATION (1.0); REVIEW HISTORICAL OAL DECISIONS TO LOCATE DECISIONS TO IMPEACH EXPECTED TESTIMONY OF EHLING AT TRIAL (5.3).	6.3	\$3,969.00
1/25/2023	GWB	ATTEND TRIAL STRATEGY CALL WITH TJO AND G. LITTLE.	1.0	\$445.00
1/26/2023	HDR	MTG WITH TJO RE STATUS OF TRIAL.	0.1	\$53.00
1/26/2023	TJO	CONTINUE REVIEWING STRUNK FILE AND PREPARING DEMONSTRATIVE EXHIBIT FOR TRIAL (4.1); TELEPHONE CONFERENCE WITH C. REISMAN RE: STATUS OF SETTLEMENT DISCUSSIONS (0.2); ZOOM CONFERENCE WITH G. LITTLE AND ASSOC. (GB) RE: REVIEWING DUE PROCESS DECISIONS SELECTED FROM OAL WEBSITE TO USE FOR IMPEACHMENT PURPOSES AT TRIAL (1.8).	6.1	\$3,843.00
1/26/2023	GWB	ATTEND TRIAL STRATEGY AND STATUS CALL WITH TJO AND G. LITTLE.	1.8	\$801.00
1/27/2023	TJO	CONTINUE REVIEWING STRUNK FILE AND PREPARING DEMONSTRATIVE (2.7); ZOOM CONFERENCE WITH B. MARVIN RE: TRIAL PREP (0.9).	3.6	\$2,268.00
1/27/2023	GWB	ATTEND CALL WITH TRIAL GRAPHICS TEAMS.	1.0	\$445.00
1/29/2023	HDR	REVIEW CORRESP FROM TJO RE TRIAL PREP.	0.1	\$53.00
1/30/2023	TJO	ZOOM CONFERENCE WITH E.P. RE: TRIAL PREPARATION (2.6); ZOOM CONFERENCE WITH YHS RE: TRIAL PREPARATION (1.6); ZOOM CONFERENCE WITH L. G. RE: TRIAL PREPARATION (1.0); REVISE DIRECT EXAM OUTLINES FOR YHS, LG. AND EP (2.6).	7.8	\$4,914.00
1/30/2023	GWB	ATTEND THE WITNESS PREPARATION SESSION FOR YHS.	1.6	\$712.00
1/30/2023	GWB	ATTEND THE WITNESS PREPARATION SESSION FOR LATEEFAH GILLIAM.	1.0	\$445.00
1/30/2023	GWB	EDIT AND REVISE OPENING PPT SLIDES.	1.6	\$712.00
1/31/2023	HDR	CORRESP WITH TJO RE STATUS OF SETTLEMENT DISCUSSIONS.	0.1	\$53.00
1/31/2023	TJO	EMAIL J. ROSEN VALVERDE, G. LITTLE AND ASSOC. (GB) RE: SCHEDULING ZOOM TRIAL PREP SESSION (0.2); ATTEND TRIAL PREP SESSION WITH J. ROSEN VALVERDE (1.8); ATTEND ZOOM CONFERENCE OF DRY RUN OF OPENING AND DISCUSSION OF DIRECT EXAMINATIONS (2.8); TWO TELEPHONE CONFERENCES WITH G. LITTLE (0.2); REVIEW AND EDIT STRUNK DEMONSTRATIVE AND EMAIL GRAPHICS CONSULTANT RE: STRUNK DEMONSTRATIVE (1.0); REVISE OUTLINE OF PERRY DIRECT EXAMINATION (0.8); REVISE OUTLINE OF GILLIAM DIRECT EXAMINATION (0.4); REVISE OUTLINE OF MOSCOWITZ DIRECT EXAMINATION (0.4).	7.6	\$4,788.00
1/31/2023	GWB	ATTEND WITNESS PREPARATION SESSION FOR JENNIFER ROSEN VALVERDE.	1.4	\$623.00

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Date	Person	Description of Services	Hours	Amount
1/31/2023	GWB	ATTEND OPENING DRY RUN AND TRIAL STRATEGY CALL.	2.8	\$1,246.00
2/1/2023	HDR	MTG WITH T. OLEARY RE STATUS OF CASE AND MEDIATION EFFORTS.	0.1	\$53.00
2/1/2023	TJO	TELEPHONE CONFERENCE WITH G. LITTLE RE: TRIAL PREP (0.1); REVIEW DECISIONS ON OAL WEBSITE ISSUED SINCE 2021 AND INCORPORATE QUESTIOSN REGARDING SAME INTO MOSCOWITZ DIRECT EXAM OUTLINE (2.3).	2.4	\$1,512.00
2/1/2023	GWB	DRAFT SUBPOENAS FOR ELIZABETH PERRY AND LATEEFAH GILLIAM TO TESTIFY AT TRIAL.	0.5	\$222.50
2/6/2023	TJO	EMAIL SIX PLANITIFFS SCHEDULED TO BE WITNESSES AT TRIAL TO ADVISE OF TENTATIVE SETTLEMENT AND TRIAL ADJOURNMENT (0.2); BEGIN PREPARING COUNSEL FEE CERTIFICATION (3.9).	4.1	\$2,583.00
2/7/2023	TJO	CONTINUE PREPARING COUNSEL FEE CERTIFICATION.	8.3	\$5,229.00
2/8/2023	TJO	CONTINUE PREPARING COUNSEL FEE CERTIFICATION.	7.9	\$4,977.00
2/9/2023	TJO	CONTINUE PREPARING COUNSEL FEE CERTIFICATION.	4.6	\$2,898.00
2/9/2023	MH	ATTEND TO ORDER ADJOURNING TRIAL.	0.1	\$23.50
Total Professional Services			2,698.7	\$1,496,130.50

PERSON RECAP

Person	Hours	Rate	Amount
DDC David D. Cramer	109.7	\$450.00	\$49,365.00
TJO Thomas J. O'Leary	1,772.3	\$630.00	,116,549.00
HDR Hector D. Ruiz	360.9	\$530.00	\$191,277.00
ZDE Zahire D. Estrella	0.7	\$450.00	\$315.00
GWB Gerhard W. Buehning	146.7	\$445.00	\$65,281.50
MH Mary Hogan	263.0	\$235.00	\$61,805.00
NMT Nicole M. Travostino	29.2	\$235.00	\$6,862.00
BET Barbara Troyan	0.4	\$235.00	\$94.00
CIA Carmen I. Abrazado	8.9	\$290.00	\$2,581.00
CC Christine Clark	4.5	\$290.00	\$1,305.00
ATF Andrew T. Frisoli	2.4	\$290.00	\$696.00

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2/21/2020	COURTER REPORTER CHARGES - TRANSCRIPT FEE	\$882.90
2/19/2021	MISCELLANEOUS- ADVIK MBOX CONVERTER TOOLKIT - PERSONAL LICENSE	\$105.56
2/19/2021	MISCELLANEOUS- ADVIK YAHOO BACKUP - PERSONAL LICENSE	\$41.58
3/29/2021	VERITEXT LEGAL SOLUTIONS- DEPOSITION TRANSCRIPTS- DEPOSITION OF CATHERINE ANTHONY	\$1,773.60
6/3/2021	J.H. BUEHRER & ASSOCIATES- DEPOSITION TRANSCRIPTS- DEPOSITION	\$1,262.50
7/6/2021	COURIER SERVICE- COURIER TO WORTHINGTON	\$80.00
7/27/2021	COURIER SERVICE- -Guaranteed Subpoena-Inv 20210721143735	\$80.00
8/9/2021	Spartan Detective Agency Inc.- Miscellaneous- Skip Trace on Judge Sanders	\$79.96
8/12/2021	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Sander Deposition	\$1,002.50
8/16/2021	COURIER SERVICE- Courier to Carolyn Marano	\$25.00
8/17/2021	COURIER SERVICE- Courier to Carolyn Marano	\$160.00
8/23/2021	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Deposition of Worthington	\$945.50
9/9/2021	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Marano Deposition	\$1,689.00
9/16/2021	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Hendricks Deposition	\$1,675.00
9/21/2021	Rosenberg & Associates, Inc.- Deposition Transcripts- Certified Transcript of Adele Sweeten	\$1,095.67
9/27/2021	COURIER SERVICE- Courier to Hon. Noel I. Hillman, u.s.d.j.	\$19.67
10/18/2021	AMEX - TJO (1121)- COURT REPORTER CHARGES- DIANA DOMAN TRANSCRIBING	\$411.40
11/3/2021	BARRY E. MOSCOWITZ- WITNESS FEE- WITNESS FEE	\$135.68
11/3/2021	LAURA B. SANDERS- WITNESS FEE- WITNESS FEE	\$95.43
11/3/2021	CANDICE G. HENDRICKS- WITNESS FEE- WITNESS FEE	\$84.74
11/3/2021	ELLEN S. BASS- WITNESS FEE- WITNESS FEE	\$135.68
11/5/2021	COURIER SERVICE- Courier to John Worthington	\$80.00
11/8/2021	PHOTOCOPIES (8074 @ \$0.20)	\$1,614.80
11/30/2021	COURIER SERVICE- Courier to Hon. Noell Hillman, U.S.D.J.	\$42.56
11/30/2021	COURIER SERVICE- Courier to Hon. Noell Hillman, U.S.D.J.	\$48.65
12/8/2021	Rosenberg & Associates, Inc.- Deposition Transcripts- Certified Transcript of Marva Milligan	\$1,005.50

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Date	Description of Disbursements	Amount
12/8/2021	Rosenberg & Associates, Inc.- Deposition Transcripts- Certified Transcript of Lateefah Gilliam	\$610.25
12/8/2021	Rosenberg & Associates, Inc.- Deposition Transcripts- Certified Transcript of Elizabeth Blamble	\$1,035.25
12/8/2021	Spartan Detective Agency Inc.- Investigations Services- Skip Trace on Carolyn Marano	\$106.62
12/14/2021	COURIER SERVICE- Courier to Carolyn Marano	\$135.00
12/27/2021	COURIER SERVICE- Courier to Hon. Noell Hillman, U.S.D.J.	\$20.13
1/13/2022	MISCELLANEOUS- CAROLYN MARANO INVESTIGATION	\$396.53
2/10/2022	COURIER SERVICE- Courier to Hon. Noel Hillman	\$34.47
2/10/2022	COURIER SERVICE- Courier to Hon. Noel Hillman	\$35.80
3/2/2022	ROSENBERG & ASSOCIATES, INC.- DEPOSITION TRANSCRIPTS- CERTIFIED TRANSCRIPT OF ELIZABETH BLAMBLE	\$1,066.31
3/2/2022	ROSENBERG & ASSOCIATES, INC.- DEPOSITION TRANSCRIPTS- CERTIFIED TRANSCRIPT OF LATEEFAH GILLIAM	\$628.55
3/2/2022	ROSENBERG & ASSOCIATES, INC.- DEPOSITION TRANSCRIPTS- CERTIFIED TRANSCRIPT OF MARVA MILLIGAN	\$1,035.66
4/8/2022	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Original Transcript of Rota (Expedited)	\$1,689.00
4/14/2022	Miscellaneous- Blow-Up for deposition exhibit	\$378.49
4/19/2022	COURIER SERVICE- Courier to Candice G. Hendricks	\$135.00
5/2/2022	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Deposition transcript of Kathleen Ehling 4-8-2022	\$902.75
5/3/2022	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Transcript	\$589.25
5/6/2022	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Deposition Transcript (In Re: Candice G. Hendricks)	\$225.00
6/6/2022	D'Amico Certified Shorthand Reporting- Deposition Transcripts- Deposition Transcript.	\$613.00
6/9/2022	AMEX - TJO (1121)- Parking- Parking	\$11.37
9/6/2022	AMEX - TJO (1121)- Parking- Parking	\$11.37
9/7/2022	COURIER SERVICE- Courier to Greg Little	\$101.22
9/7/2022	COURIER SERVICE- Courier to Greg Little	\$64.74
9/7/2022	COURIER SERVICE- Courier to Greg Little	\$99.18
9/7/2022	COURIER SERVICE- Courier to Greg Little	\$91.05
9/7/2022	COURIER SERVICE- Courier to Greg Little	\$51.03
9/8/2022	COURIER SERVICE- Courier to Hon. Noel I. Hillman, U.S.D.J.	\$56.49

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9/13/2022	COURIER SERVICE- Courier to Mr. Greg Little	\$120.90
10/26/2022	COURIER SERVICE- Courier to Greg Little	\$67.72
11/2/2022	AMEX - TJO (1121)- Parking- Parking	\$11.00
11/9/2022	TransPerfect Translations International Inc.- Deposition Transcripts- Document Management-T. O'Leary	\$10,332.00
12/14/2022	COURIER SERVICE- Courier to Shaye Brown-Crandoll	\$29.86
12/14/2022	COURIER SERVICE- Courier to Adele Sweeten	\$35.94
12/15/2022	COURIER SERVICE- Courier to Lateefah Gilliam	\$29.86
12/21/2022	COLOR COPIES (914 @ \$1.00)	\$914.00
12/22/2022	COURIER SERVICE- Courier to Mr. Yonathan Haile-Selassie	\$27.06
1/4/2023	TransPerfect Translations International Inc.- Deposition Transcripts- TransPerfect-Document Management	\$4,740.00
2/6/2023	TransPerfect Translations International Inc.- Deposition Transcripts- TransPerfect Deposition Services-Document Management-T.O'Leary	\$7,560.00
	Total Disbursements	\$48,564.73
	Total Services	,496,130.50
	Total Disbursements	\$48,564.73
	Total Current Charges	\$1,544,695.23
	PAY THIS AMOUNT	\$1,544,695.23

Due Upon Receipt. Please include the invoice number on all remittance. Thank you.