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Attorneys for Plaintiffs

**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)

**DECLARATION OF
DONALD A. SOUTAR**

DONALD A. SOUTAR hereby declares:

1. I am an attorney-at-law of the State of New Jersey and I am Counsel to the law firm of Coyle & Morris LLP, which was co-counsel for the plaintiffs in the above-captioned action (the "Action"). As such, I am fully aware of the facts set forth in this Declaration.

2. I make this Declaration, based on my personal knowledge and review of my firms business records, in support of the Plaintiffs' application for an award of attorneys' fees and expenses pursuant to the *Consent Order and Settlement Agreement* submitted for the Court's approval in this matter.

3. I have practiced in the area complex commercial litigation for 23 years, including a focus on special education law since 2018.

4. From 2000 through 2011, I was associated with Day Pitney LLP, first as an Associate, then rising to Senior Counsel, where my practice focused on commercial litigation.

5. From 2011 through April 2018, I was an Associate at Weitz & Luxenberg, PC, where my practice focused on mass tort and class action matters. Beginning in February 2017, and continuing through my departure from Weitz & Luxenberg, I served as plaintiffs' Interim Class Counsel in *Bates, et al. v. The 3M Company, et al.*, Case No. 2:16-5553-PBT in the United States District Court for the Eastern District of Pennsylvania.

6. I joined John Rue & Associates, LLC ("JRA") as Counsel in April 2018, was promoted to Partner at the end of 2018, and to Managing Partner shortly thereafter. During my three-and-a-half year tenure at JRA, I focused almost exclusively on education and special education matters, including handling cases from inception through hearing in the Office of Administrative Law ("OAL"), litigating in the federal and state trial courts of New Jersey, and pursuing and defending appeals in the Superior Court of New Jersey - Appellate Division and the United States Court of Appeals for the Third Circuit.

7. I have been involved with this matter from the very beginning. I was the Managing Partner of JRA in 2019 when JRA filed the initial Complaint and I assisted with its drafting. I

continued to work on this matter throughout my tenure at JRA, which lasted until November 30, 2021.

8. In December 2021, I joined Coyle & Morris LLP (then, “Coyle Law Group LLP”) as Counsel, where I continue to focus on commercial litigation, including education and special education matters. I continued to work extensively on this matter at my new firm.

9. Coyle & Morris LLP has different billing rates for different matters, which vary depending on the amount of risk assumed in the representation and preexisting attorney-client relationships. My billing rate for Coyle & Morris LLP on this matter is \$700.00, which reflects the contingent nature of the representation, where no client is responsible for any part of my hourly fee, the hotly contested positions of the parties, and the fact that Coyle & Morris LLP had no preexisting relationship with the plaintiffs. In determining my billing rate, Coyle & Morris LLP was informed by: (a) the rates published by the Community Legal Services of Philadelphia for cases in which the law allows for the award of attorneys’ fees (*see* <https://clsphila.org/about-community-legal-services/attorney-fees/> (providing for a range of \$630-\$715 per hour for attorneys practicing for 21-25 years)(last visited March 4, 2024); and (b) the rates that this Court approved in *Adam X. v. N.J. Dep't of Corr.*, Civil Action No. 17-00188 (FLW) (LHG), 2022 U.S. Dist. LEXIS 37601, at *31 (D.N.J. Mar. 3, 2022), which was also a class action against the State of New Jersey related to the provision of special education.

10. From the time that I joined Coyle & Morris LLP through August 22, 2023, which is the date of my last recorded billing entry in this matter, I devoted 422.1 hours to this matter at a value of \$295,470.00. I have attached a copy of Coyle & Morris LLP’s Draft Invoice covering

that period as Exhibit A. For the avoidance of doubt, this time is exclusive of the time that I devoted to this matter while at John Rue & Associates, LLC.


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

Dated: March 4, 2024



DONALD A. SOUTAR

Exhibit A



COYLE & MORRIS

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INVOICE

Invoice # 3044
Date: 03/04/2024
Due On: 04/03/2024

C P

00905

C.P. Et al v. NJDOE

Type	Date	Attorney	Notes	Quantity	Rate	Total
Service	12/13/2021	DAS	Participate in Steering Committee meeting to discuss current status of Final Pretrial Order, trial preparation , etc.	0.80	\$700.00	\$560.00
Service	12/13/2021	DAS	Review/revise draft letter to Judge Skahill.	0.80	\$700.00	\$560.00
Service	12/14/2021	DAS	Prepare for discovery/motion call with Magistrate Judge Skahill.	0.50	\$700.00	\$350.00
Service	12/14/2021	DAS	Participate in discovery/motion call with Magistrate Judge Skahill.	0.90	\$700.00	\$630.00
Service	12/14/2021	DAS	Participate in follow-up call with Steering Committee re: outcome of hearing, planning for preparation of Final Pre-Trial Order, and strategy going forward.	0.50	\$700.00	\$350.00
Service	12/16/2021	DAS	Work on calculations for response to Defendants' Rule 56.1 Statement.	1.20	\$700.00	\$840.00
Service	12/16/2021	DAS	Review/revise draft letter to Judge Skahill.	0.20	\$700.00	\$140.00
Service	12/19/2021	DAS	Conference with J. Rue re: reply brief on appeal of magistrate's decision and strategy for addressing potential need for additional discovery.	0.70	\$700.00	\$490.00
Service	12/19/2021	DAS	Trial planning for client testimony.	2.30	\$700.00	\$1,610.00
Service	12/20/2021	DAS	Steering Committee Meeting.	0.80	\$700.00	\$560.00
Service	12/20/2021	DAS	Briefly review/revise draft reply brief.	0.70	\$700.00	\$490.00

Service	12/20/2021	DAS	Conference with J. Rue re: final content of reply brief.	0.50	\$700.00	\$350.00
Service	12/21/2021	DAS	Attend Final Pretrial Conference and prepare notes re: same; participate in post-conference team call.	2.30	\$700.00	\$1,610.00
Service	12/21/2021	DAS	Review/revise draft brief in support of in limine motions.	2.30	\$700.00	\$1,610.00
Service	12/21/2021	DAS	Draft Notice of Motion and proposed order.	0.80	\$700.00	\$560.00
Service	12/22/2021	DAS	Update Captions to ancillary motion documents to reflect recently entered Order Amending Caption; review/revise draft Rue Certification.	0.40	\$700.00	\$280.00
Service	12/23/2021	DAS	Review/revise draft brief in support of in limine motions; review/revise draft letter to adversary; prepare Rue Certification and draft explanatory email re: docs for filing.	1.50	\$700.00	\$1,050.00
Service	12/27/2021	DAS	Steering Committee Meeting.	1.30	\$700.00	\$910.00
Service	12/28/2021	DAS	Phone call re: strategy for scheduling.	0.30	\$700.00	\$210.00
Service	01/03/2022	DAS	Steering Committee call to discuss strategy and open issues	0.60	\$700.00	\$420.00
Service	01/03/2022	DAS	Follow-up call re: finalizing sanctions motion.	0.30	\$700.00	\$210.00
Service	01/03/2022	DAS	Review/respond to email re: D.O. Documents.	0.30	\$700.00	\$210.00
Service	01/03/2022	DAS	Review and finalize Rule 11 Motion Package.	0.70	\$700.00	\$490.00
Service	01/04/2022	DAS	Review/revise Rule 11 Motion documents and circulate for internal review.	0.50	\$700.00	\$350.00
Service	01/07/2022	DAS	Meeting with J. Rue and R. Thurston re: Plaintiff Witness Planning.	1.10	\$700.00	\$770.00
Service	01/08/2022	DAS	Review briefs on Motions in limine; review/revise draft reply brief, including drafting inserts for brief and related legal research.	3.10	\$700.00	\$2,170.00
Service	01/08/2022	DAS	Work on outline of background facts for plaintiff witness testimony.	1.50	\$700.00	\$1,050.00
Service	01/10/2022	DAS	Participate in Steering Committee meeting to discuss open issues	0.80	\$700.00	\$560.00
Service	01/10/2022	DAS	Conference re: Client Witness Prep.	0.40	\$700.00	\$280.00
Service	01/12/2022	DAS	Work on issues related to plaintiff witness preparation; draft email to plaintiff witness	1.30	\$700.00	\$910.00

			group.			
Service	01/12/2022	DAS	Review/respond to plaintiff witness emails; draft email to steering committee.	0.50	\$700.00	\$350.00
Service	01/12/2022	DAS	Review emails re: prep meeting; respond to same.	0.10	\$700.00	\$70.00
Service	01/12/2022	DAS	Review/respond to email from plaintiff E.P.; email to C. Reisman re: same.	0.20	\$700.00	\$140.00
Service	01/12/2022	DAS	Telephone Conference with J. Rue re: witness responsibility.	0.30	\$700.00	\$210.00
Service	01/12/2022	DAS	Team call to prepare for conference with Judge Hillman.	1.00	\$700.00	\$700.00
Service	01/13/2022	DAS	Participate in status conference with Judge Hillman; follow-up call re: same.	1.30	\$700.00	\$910.00
Service	01/13/2022	DAS	Prepare for client meetings; draft outline for client meetings.	1.70	\$700.00	\$1,190.00
Service	01/13/2022	DAS	Final preparation for client meetings; conduct first Plaintiff meeting.	1.30	\$700.00	\$910.00
Service	01/13/2022	DAS	Conduct Plaintiff Update Meeting No. 2.	1.10	\$700.00	\$770.00
Service	01/14/2022	DAS	Conduct Plaintiff update meeting No. 3.	1.10	\$700.00	\$770.00
Service	01/14/2022	DAS	Conduct Plaintiff update meeting No. 4.	1.00	\$700.00	\$700.00
Service	01/16/2022	DAS	Review Defendants' SJ Brief; notes re: same; begin review of opposition brief.	1.00	\$700.00	\$700.00
Service	01/17/2022	DAS	Review/revise brief in opposition to MSJ; work on supporting facts for same.	2.40	\$700.00	\$1,680.00
Service	01/17/2022	DAS	Work on brief in opposition to MSJ, with a concentration on specific client issues.	3.30	\$700.00	\$2,310.00
Service	01/17/2022	DAS	Detailed review of D.O.'s document production in connection with drafting support for statements in response to Rule 56.1 Statement.	2.20	\$700.00	\$1,540.00
Service	01/19/2022	DAS	Draft email summary of plaintiff meeting for plaintiff D.O.	0.80	\$700.00	\$560.00
Service	01/20/2022	DAS	Attention to analysis of D.O. matter, including analysis of documentary support for issues related to SJ motion.	2.60	\$700.00	\$1,820.00
Service	01/20/2022	DAS	Further attention to D.O. document production.	0.30	\$700.00	\$210.00
Service	01/20/2022	DAS	Further attention to analysis of D.O. document production.	0.30	\$700.00	\$210.00

Service	01/20/2022	DAS	Work on organization of plaintiff documents; work on Rule 56.1 Statement.	2.00	\$700.00	\$1,400.00
Service	01/21/2022	DAS	Telephone conference with M. Hogan (Walsh, Pizzi) re: D.O. document production; attention to revision of D.O. response to Rule 56.1 Statement; Draft email re: legal strategy with respect to D.O.'s FAPE case; emails re: all of these issues.	2.80	\$700.00	\$1,960.00
Service	01/23/2022	DAS	Analyze client documents to identify ages of students for opposition to State's MSJ; draft inserts for brief in opposition to MSJ.	3.90	\$700.00	\$2,730.00
Service	01/23/2022	DAS	Draft email to each plaintiff, providing a copy of each's deposition transcript.	1.00	\$700.00	\$700.00
Service	01/23/2022	DAS	Complete plaintiff emails; briefly review SJ opposition brief.	0.90	\$700.00	\$630.00
Service	01/24/2022	DAS	Review email re: procedure upon converting mediation to due process; legal analysis and research re: same.	0.70	\$700.00	\$490.00
Service	01/24/2022	DAS	Participate in Steering Committee Call to discuss finalizing SJ brief, agreement between counsel, and planning for trial.	1.00	\$700.00	\$700.00
Service	01/24/2022	DAS	Review/respond to emails from D.O. and A.S. regarding trial participation.	0.20	\$700.00	\$140.00
Service	01/24/2022	DAS	Emails to plaintiffs re: trial prep meetings.	0.20	\$700.00	\$140.00
Service	01/27/2022	DAS	Prepare for meeting with client E.P.	1.10	\$700.00	\$770.00
Service	01/27/2022	DAS	Complete preparation for meeting with E.P.	1.30	\$700.00	\$910.00
Service	01/27/2022	DAS	Witness prep meeting with E.P.	1.20	\$700.00	\$840.00
Service	01/28/2022	DAS	Prepare for meeting with client C.P.	1.30	\$700.00	\$910.00
Service	01/28/2022	DAS	Witness Prep meeting with C.P.	1.10	\$700.00	\$770.00
Service	01/29/2022	DAS	Prepare for strategy call; strategy call with J. Rue and G. Little.	2.40	\$700.00	\$1,680.00
Service	01/31/2022	DAS	Organize client chart project.	0.80	\$700.00	\$560.00
Service	02/01/2022	DAS	Prepare for team call re: Plaintiff Timelines; attention to Plaintiff timelines.	0.90	\$700.00	\$630.00
Service	02/01/2022	DAS	Conference with J. Rue re: open assignments.	0.20	\$700.00	\$140.00
Service	02/01/2022	DAS	Emails to/from J. Wasserman re: factual background of individual plaintiff cases; review/analyze J. Wasserman timeline	1.10	\$700.00	\$770.00

			proposing State's potential position and comment on same.			
Service	02/04/2022	DAS	Participate in trial planning meeting with team.	1.00	\$700.00	\$700.00
Service	02/06/2022	DAS	Work on individual timeline for Plaintiff E.P.; create sample demonstrative exhibit based on timeline.	4.00	\$700.00	\$2,800.00
Service	02/06/2022	DAS	Work on individual timelines for plaintiffs SBC, YHS, CP and DO.	1.50	\$700.00	\$1,050.00
Service	02/06/2022	DAS	Complete timelines for assigned plaintiffs and circulate to steering committee.	4.80	\$700.00	\$3,360.00
Service	02/07/2022	DAS	Status and strategy call with J. Rue.	0.80	\$700.00	\$560.00
Service	02/08/2022	DAS	Meeting with J. Rue re: trial planning and witness assignments.	0.40	\$700.00	\$280.00
Service	02/09/2022	DAS	Telephone conference with J. Rue to discuss witness presentation at trial; follow-up re: same.	0.50	\$700.00	\$350.00
Service	02/13/2022	DAS	Team call to discuss strategy for addressing options related to the State's Redacted - Attorney Work-Product	0.70	\$700.00	\$490.00
Service	02/13/2022	DAS	Trial Prep: Analysis of individual plaintiff issues (SBC).	1.30	\$700.00	\$910.00
Service	02/13/2022	DAS	Trial Prep: continue with analysis of issues related to SBC; prepare analysis for MS and YHS.	4.40	\$700.00	\$3,080.00
Service	02/16/2022	DAS	Review/respond to email from Plaintiff D.O.	0.20	\$700.00	\$140.00
Service	02/17/2022	DAS	Draft update email to plaintiffs.	0.90	\$700.00	\$630.00
Service	02/17/2022	DAS	Review/respond to email from J. Rue, including related file research; phone call with J. Rue.	0.50	\$700.00	\$350.00
Service	02/18/2022	DAS	Phone call to client Lateefa Gilliam; draft follow-up email.	0.30	\$700.00	\$210.00
Service	02/22/2022	DAS	Strategy video conference with plaintiff team to prepare for conference with court.	0.90	\$700.00	\$630.00
Service	02/22/2022	DAS	Appear for "status conference" with Judge Hillman; follow-up call with team re: same.	1.30	\$700.00	\$910.00
Service	03/03/2022	DAS	Phone call with J. Rue re: oral argument assignments for March 8th hearing.	0.30	\$700.00	\$210.00
Service	03/07/2022	DAS	Team call to coordinate efforts and	1.00	\$700.00	\$700.00

			message for March 8, 2022 oral argument.			
Service	03/08/2022	DAS	Appear for conference/oral argument on outstanding motions.	2.50	\$700.00	\$1,750.00
Service	03/08/2022	DAS	Participate in follow-up call to discuss outcome of hearing and strategy for handling requested letter and potential for additional discovery.	0.40	\$700.00	\$280.00
Service	03/10/2022	DAS	Review/revise draft letter to Court.	0.80	\$700.00	\$560.00
Service	03/10/2022	DAS	Briefly review updated draft of letter to Court.	0.10	\$700.00	\$70.00
Service	04/11/2022	DAS	Telephone conference with J. Rue re: information needed for upcoming depositions.	0.40	\$700.00	\$280.00
Service	04/13/2022	DAS	Video Conference with Steering Committee to review ALJ Moscovitz's Deposition and chart a path forward.	0.80	\$700.00	\$560.00
Service	04/14/2022	DAS	Compile potential exhibits for Bass Deposition.	1.20	\$700.00	\$840.00
Service	05/02/2022	DAS	Review/comment on draft letter to Judge Skahill.	0.20	\$700.00	\$140.00
Service	05/03/2022	DAS	Review/revise draft letter to Judge Skahill re: Hendrick's deposition.	0.20	\$700.00	\$140.00
Service	05/05/2022	DAS	Review draft settlement demand.	0.20	\$700.00	\$140.00
Service	05/06/2022	DAS	Team call to discuss settlement proposal and potential limitation on Confidentiality Order.	0.50	\$700.00	\$350.00
Service	05/11/2022	DAS	Work on outline of G.W. v. Ringwood matter in connection with deposition of Chief ALJ Bass.	0.30	\$700.00	\$210.00
Service	05/11/2022	DAS	Telephone conference with J. Rue to discuss strategy in light of findings from Bass Deposition.	0.40	\$700.00	\$280.00
Service	06/03/2022	DAS	Review/analyze email from co-counsel; review records re: same.	0.50	\$700.00	\$350.00
Service	06/08/2022	DAS	Prepare for team call to prep for Settlement Conference.	1.10	\$700.00	\$770.00
Service	06/08/2022	DAS	Team call to prepare for Settlement Conference.	1.30	\$700.00	\$910.00
Service	08/22/2022	DAS	Conference with J. Rue re: class certification opinion and moving forward.	0.70	\$700.00	\$490.00

Service	08/23/2022	DAS	Telephone conference with J. Rue to discuss strategy.	0.50	\$700.00	\$350.00
Service	08/24/2022	DAS	Review Class Action Opinion in preparation for team meeting.	0.60	\$700.00	\$420.00
Service	08/24/2022	DAS	Team meeting to discuss trial preparation and issues related to Order/Opinion granting Class Certification.	1.10	\$700.00	\$770.00
Service	08/24/2022	DAS	Further analysis of Class Certification Opinion; internal email summarizing same.	0.70	\$700.00	\$490.00
Service	08/24/2022	DAS	Conference with J. Rue re: strategy for (b)(3) class.	0.40	\$700.00	\$280.00
Service	08/26/2022	DAS	Telephone conference with J. Rue to discuss strategy for proceeding with Issues Class and Class Notice.	0.30	\$700.00	\$210.00
Service	08/26/2022	DAS	Meeting with J. Rue to discuss assignments related to (b)(3) class; team meeting to discuss strategy, trial prep, etc.	2.10	\$700.00	\$1,470.00
Service	08/31/2022	DAS	Phone call with J. Rue re: Redacted - [REDACTED] draft email with preliminary research results; conduct more detailed research re: same.	0.90	\$700.00	\$630.00
Service	09/02/2022	DAS	Telephone conference with J. Rue and J. Wasserman regarding potential fee application, potential for mediation, and related issues.	1.60	\$700.00	\$1,120.00
Service	09/09/2022	DAS	Strategy call with J. Rue.	0.60	\$700.00	\$420.00
Service	09/11/2022	DAS	Review Summary Judgment Opinion and create notes re: same.	1.00	\$700.00	\$700.00
Service	09/13/2022	DAS	Prepare for team meeting.	0.50	\$700.00	\$350.00
Service	09/13/2022	DAS	Team meeting to discuss strategy for presenting issues to NJDOE and for response to NJDOE's motion.	0.50	\$700.00	\$350.00
Service	09/13/2022	DAS	Review/revise draft letter to Judge Hillman re: class notice.	0.80	\$700.00	\$560.00
Service	09/13/2022	DAS	Team conference to discuss options related to bifurcation and class notice.	0.60	\$700.00	\$420.00
Service	09/14/2022	DAS	Team call to discuss strategy and division of labor for opposition to motion to stay and cross-motion to bifurcate.	1.20	\$700.00	\$840.00
Service	09/14/2022	DAS	Research related to bifurcation and severance.	2.00	\$700.00	\$1,400.00

Service	09/14/2022	DAS	Work on draft letter to Judge Hillman regarding severance.	2.50	\$700.00	\$1,750.00
Service	09/15/2022	DAS	Draft legal arguments for letter to Judge Hillman re: severance.	3.10	\$700.00	\$2,170.00
Service	09/15/2022	DAS	Continue working on legal arguments for letter to Judge Hillman, including related research.	5.50	\$700.00	\$3,850.00
Service	09/16/2022	DAS	Review/revise draft letter to Judge Hillman re: severance and circulate draft for review.	1.60	\$700.00	\$1,120.00
Service	09/16/2022	DAS	Review proposed changes to letter brief to Judge Hillman re: severance and incorporate same.	0.50	\$700.00	\$350.00
Service	09/18/2022	DAS	Team call to discuss letter to Judge Hillman re: Bifurcation/Severance.	0.30	\$700.00	\$210.00
Service	09/18/2022	DAS	Review/revise draft letter to Judge Hillman; draft proposed form of Order.	0.60	\$700.00	\$420.00
Service	09/19/2022	DAS	Review/analyze letter from NJDOE to Judge Hillman.	0.30	\$700.00	\$210.00
Service	09/19/2022	DAS	Study party positions in preparation for zoom conference with court.	0.50	\$700.00	\$350.00
Service	09/19/2022	DAS	Appear for zoom conference with Judge Hillman regarding the issues of bifurcation and severance.	1.20	\$700.00	\$840.00
Service	09/19/2022	DAS	Team conference to discuss outcome of court conference and strategy for addressing same.	0.70	\$700.00	\$490.00
Service	09/19/2022	DAS	Meeting with tech consultant regarding database structures and begin to draft 30(b)(6) deposition to NJDOE.	1.20	\$700.00	\$840.00
Service	09/19/2022	DAS	Meeting with tech consultant to discuss categories for draft deposition notice and questions for deposition.	1.30	\$700.00	\$910.00
Service	09/20/2022	DAS	Review/revise draft deposition notice and circulate for team review.	1.10	\$700.00	\$770.00
Service	09/20/2022	DAS	Review/revise draft deposition notice and circulate for team review.	1.10	\$700.00	\$770.00
Service	09/20/2022	DAS	Review comments to deposition notice and revise same.	0.30	\$700.00	\$210.00
Service	09/20/2022	DAS	Research re: deposition.	0.70	\$700.00	\$490.00
Service	09/20/2022	DAS	Telephone conference with J. Rue; finalize and serve 30(b)(6) deposition notice for	0.40	\$700.00	\$280.00

			database professional.			
Service	09/21/2022	DAS	Team call to discuss new developments regarding NJDOE tech person and class notice.	0.80	\$700.00	\$560.00
Service	09/21/2022	DAS	Review/revise/comment on draft notice; phone call with J. Rue re: same.	0.40	\$700.00	\$280.00
Service	09/22/2022	DAS	Research files for information related to mailing vendors; draft email to J. Rue paralegal re: considerations for mass mailings.	0.30	\$700.00	\$210.00
Service	09/22/2022	DAS	Research FERPA issues in connection with evaluation of notice options; draft email to J. Rue re: same.	0.60	\$700.00	\$420.00
Service	09/23/2022	DAS	Review email regarding status update on NJDOE technical capabilities; review/revise draft email to adversary re: potential to adjourn deposition.	0.30	\$700.00	\$210.00
Service	09/23/2022	DAS	Review/revise updated email to adversary re: notice and tech deposition.	0.40	\$700.00	\$280.00
Service	09/23/2022	DAS	Draft letter to Judge Hillman re: adjournment of deposition.	0.80	\$700.00	\$560.00
Service	09/23/2022	DAS	Revise letter per J. Rue comments; emails to/from J. Rue; email to adversary.	0.30	\$700.00	\$210.00
Service	09/27/2022	DAS	Meeting with co-counsel to discuss progress of mediation and issues related to our position in settlement.	0.80	\$700.00	\$560.00
Service	09/27/2022	DAS	Review NJDOE Certification related to class member list and draft email to class counsel re: same.	0.30	\$700.00	\$210.00
Service	09/27/2022	DAS	Research regarding Redacted - Attorney Work-Product	2.70	\$700.00	\$1,890.00
Service	09/28/2022	DAS	Prepare brief memo summarizing research Redacted - Attorney Work-Product	0.80	\$700.00	\$560.00
Service	09/28/2022	DAS	Telephone conference with J. Rue as follow-up to Mediation and open assignments.	0.10	\$700.00	\$70.00
Service	09/28/2022	DAS	Work on memo Redacted - Attorney Work-Product	1.60	\$700.00	\$1,120.00
Service	09/28/2022	DAS	Prepare brief memo summarizing research Redacted - Attorney Work-Product	0.80	\$700.00	\$560.00

Service	09/29/2022	DAS	Draft letter to adversary re: cancelling deposition.	0.70	\$700.00	\$490.00
Service	09/29/2022	DAS	Telephone conference with J. Rue re: moving forward on notice and impact on settlement.	0.30	\$700.00	\$210.00
Service	09/29/2022	DAS	Draft letter to Judge Hillman re: cancelling deposition.	0.90	\$700.00	\$630.00
Service	09/29/2022	DAS	Convert letter to Judge Hillman for my signature; finalize and file same.	0.20	\$700.00	\$140.00
Service	09/30/2022	DAS	Draft memo re: conflict of interest.	4.50	\$700.00	\$3,150.00
Service	10/03/2022	DAS	Dialogue with co-counsel via email, including related file research.	0.40	\$700.00	\$280.00
Service	10/10/2022	DAS	Review/revised updated draft letter to Judge Hillman.	0.30	\$700.00	\$210.00
Service	10/14/2022	DAS	Conference with J. Rue to discuss draft Consent Decree and implications for settlement, etc.	0.80	\$700.00	\$560.00
Service	10/16/2022	DAS	Study case law implementing Rule 23 in preparation for team meeting.	1.30	\$700.00	\$910.00
Service	10/16/2022	DAS	Continue preparation for team meeting, including analyzing caselaw, reviewing pleadings, and reviewing draft Consent Decree.	2.50	\$700.00	\$1,750.00
Service	10/16/2022	DAS	Team Meeting to discuss Consent Decree.	1.00	\$700.00	\$700.00
Service	10/17/2022	DAS	Review/analyze updated settlement proposal and prepare for team call.	1.20	\$700.00	\$840.00
Service	10/17/2022	DAS	Research legal issues related to potential settlement as assigned by Class Counsel.	0.30	\$700.00	\$210.00
Service	10/17/2022	DAS	Team Meeting to discuss Consent Decree.	0.90	\$700.00	\$630.00
Service	10/17/2022	DAS	Research legal issues related to consent decree.	1.20	\$700.00	\$840.00
Service	10/17/2022	DAS	Team meeting to further discuss consent decree and strategy for mediation.	1.20	\$700.00	\$840.00
Service	10/17/2022	DAS	Continue research regarding issues related to settlement.	1.10	\$700.00	\$770.00
Service	10/19/2022	DAS	Review/revise draft letter to Judge Hillman.	0.50	\$700.00	\$350.00
Service	10/24/2022	DAS	Conference with J. Rue re: strategy.	0.40	\$700.00	\$280.00
Service	10/24/2022	DAS	Team Meeting re: current status and plan for moving ahead.	1.30	\$700.00	\$910.00

Service	10/25/2022	DAS	Review/respond to email regarding potential fee application.	0.30	\$700.00	\$210.00
Service	10/26/2022	DAS	Conference with J. Rue re: trial preparation, settlement potential, and planning.	1.00	\$700.00	\$700.00
Service	11/02/2022	DAS	Telephone conference re: status update on Hillman conference and settlement strategy.	0.50	\$700.00	\$350.00
Service	11/04/2022	DAS	Conference with J. Rue re: outcome of mediation session and strategies for positions to assert going forward.	1.40	\$700.00	\$980.00
Service	11/06/2022	DAS	Telephone conference with J. Rue re: settlement negotiations.	0.70	\$700.00	\$490.00
Service	11/07/2022	DAS	Team call to discuss settlement strategy.	0.70	\$700.00	\$490.00
Service	11/07/2022	DAS	Review revised draft of settlement proposal/consent order.	0.90	\$700.00	\$630.00
Service	11/08/2022	DAS	Study draft of settlement stipulation and make further revisions to same; provide same to class counsel.	1.20	\$700.00	\$840.00
Service	11/08/2022	DAS	Team call to discuss revised settlement proposal.	1.50	\$700.00	\$1,050.00
Service	11/09/2022	DAS	Review updated draft of settlement proposal.	0.70	\$700.00	\$490.00
Service	11/09/2022	DAS	Phone call with J. Rue re: settlement demand letters for C.P. and M.S. matters.	0.30	\$700.00	\$210.00
Service	11/09/2022	DAS	Fee application team call.	0.30	\$700.00	\$210.00
Service	11/09/2022	DAS	Research dates for potential C.P. demand letter.	0.70	\$700.00	\$490.00
Service	11/10/2022	DAS	Telephone conference with J. Rue re: strategy.	0.80	\$700.00	\$560.00
Service	11/10/2022	DAS	Review/revise/comment on draft letter prepared by class counsel.	1.00	\$700.00	\$700.00
Service	11/11/2022	DAS	Final review of revisions to draft letter and forward same to class counsel; telephone conference with class counsel re: same; follow up on issues raised.	2.00	\$700.00	\$1,400.00
Service	11/18/2022	DAS	Team Call.	0.30	\$700.00	\$210.00
Service	11/29/2022	DAS	Review 9/29/2022 Order and strategize re: same.	0.80	\$700.00	\$560.00
Service	11/29/2022	DAS	Video conference regarding settlement strategy and fee demand.	0.90	\$700.00	\$630.00

Service	11/29/2022	DAS	Brief research Redacted - Attorney Work-Product	1.60	\$700.00	\$1,120.00
Service	11/30/2022	DAS	Telephone conference with J. Rue re: strategy for fee application and fee demand.	0.50	\$700.00	\$350.00
Service	11/30/2022	DAS	Telephone conference with M. Atkinson re: compiling information for fee demand.	0.60	\$700.00	\$420.00
Service	11/30/2022	DAS	Review current status of billing spreadsheet and brief analysis of same.	0.80	\$700.00	\$560.00
Service	11/30/2022	DAS	Review billing entries in connection with preparing fee demand.	1.40	\$700.00	\$980.00
Service	12/01/2022	DAS	Continue reviewing billing entries for purposes of preparing accurate fee demand; conference with J. Rue re: status of same.	2.10	\$700.00	\$1,470.00
Service	12/01/2022	DAS	Work on billing project in connection with settlement fee demand.	4.50	\$700.00	\$3,150.00
Service	12/02/2022	DAS	Continue work on billing project for settlement demand and forward sample for review.	2.70	\$700.00	\$1,890.00
Service	12/02/2022	DAS	Video conference with Class Counsel re: status of fee demand project.	2.10	\$700.00	\$1,470.00
Service	12/02/2022	DAS	Brief follow-up call with Class Counsel re: fee demand project.	0.20	\$700.00	\$140.00
Service	12/02/2022	DAS	Work on Fee Demand Project.	1.60	\$700.00	\$1,120.00
Service	12/03/2022	DAS	Work on fee demand project throughout day.	7.50	\$700.00	\$5,250.00
Service	12/04/2022	DAS	Continue to work on fee demand project, including phase analysis.	4.40	\$700.00	\$3,080.00
Service	12/05/2022	DAS	Draft internal emails to apprise of status of fee demand project.	0.80	\$700.00	\$560.00
Service	12/05/2022	DAS	Review status update on matter and draft letter to Court re: status of Class Notice.	1.90	\$700.00	\$1,330.00
Service	12/05/2022	DAS	Telephone conference with M. Atkinson re: coordination of fee demand project.	0.80	\$700.00	\$560.00
Service	12/06/2022	DAS	Video conference with J. Rue and J. Wasserman re: status of fee demand project and information needed.	1.00	\$700.00	\$700.00
Service	12/06/2022	DAS	Telephone Conference with J. Rue re: strategy for settlement vis-à-vis fee	0.50	\$700.00	\$350.00

			demand.			
Service	12/07/2022	DAS	Research issues related to class notice, Redacted - Attorney Work-Product	1.80	\$700.00	\$1,260.00
Service	12/07/2022	DAS	Continue researching Redacted - Attorney Work-	2.90	\$700.00	\$2,030.00
Service	12/08/2022	DAS	Draft brief in support of motion to approve class notice, including related supplemental research.	3.90	\$700.00	\$2,730.00
Service	12/08/2022	DAS	Continue drafting brief, including detailed review of MSJ Opinion and other rulings by Judge Hillman.	3.10	\$700.00	\$2,170.00
Service	12/08/2022	DAS	Review email from adversary with comments on class notice; internal emails re: same; begin section of motion to approve class notice related to fee shifting.	1.20	\$700.00	\$840.00
Service	12/09/2022	DAS	Draft section of brief related to fee shifting; finalize intermediate draft of brief and circulate for team review.	3.40	\$700.00	\$2,380.00
Service	12/09/2022	DAS	Draft section of brief related to fee shifting; finalize intermediate draft of brief and circulate for team review.	1.10	\$700.00	\$770.00
Service	12/12/2022	DAS	Telephone conference with J. Rue re: strategy and timing and content of communications with NJDOE regarding settlement and potential motion to stay.	0.50	\$700.00	\$350.00
Service	12/12/2022	DAS	Conference call with J. Rue and J. Wasserman re: strategy for fee demand.	0.50	\$700.00	\$350.00
Service	12/12/2022	DAS	Research file for witness contact information and draft communication to facilitate contact with trial team.	0.30	\$700.00	\$210.00
Service	12/13/2022	DAS	Review changes to master fee demand spreadsheet; work on fee demand project.	2.40	\$700.00	\$1,680.00
Service	12/15/2022	DAS	Draft emails to JRA paralegal re: comments and updates to fee demand project spreadsheet.	0.30	\$700.00	\$210.00
Service	12/15/2022	DAS	Review/respond to email from adversary re: fee demand project.	0.10	\$700.00	\$70.00
Service	12/16/2022	DAS	Review updates to master spreadsheet for fee demand; revise same; draft status email and instructions for assignment.	1.90	\$700.00	\$1,330.00
Service	12/19/2022	DAS	Telephone conference with J. Rue re:	0.50	\$700.00	\$350.00

settlement and strategy related to same.							
Service	12/19/2022	DAS	Review draft argument	Redacted - Attorney Work-Product	1.00	\$700.00	\$700.00
Service	12/19/2022	DAS	Telephone conference with M. Atkinson re: current status of master spreadsheet for fee demand project.		0.60	\$700.00	\$420.00
Service	12/20/2022	DAS	Meeting with J. Rue and K. Haley Rue to discuss demonstrative exhibits for trial; draft summary email to T. O'Leary following meeting.		1.10	\$700.00	\$770.00
Service	12/26/2022	DAS	Review brief in opposition to motion to approve class notice in preparation for drafting reply brief.		0.60	\$700.00	\$420.00
Service	12/26/2022	DAS	Outline reply brief and begin to draft same.		6.60	\$700.00	\$4,620.00
Service	12/26/2022	DAS	Work on draft reply brief.		1.20	\$700.00	\$840.00
Service	12/26/2022	DAS	Complete intermediate draft of reply brief and circulate for review.		2.20	\$700.00	\$1,540.00
Service	12/27/2022	DAS	Review/incorporate J. Rue changes to draft reply brief on motion to approve class notice; draft Certification of Service.		0.70	\$700.00	\$490.00
Service	12/28/2022	DAS	Provide missing citations for Memo related	Redacted - Attorney Work-Product	0.70	\$700.00	\$490.00
				continue revising Memo.			
Service	12/28/2022	DAS	Video conference with J. Rue and J. Wasserman re: fee demand; update billing spreadsheet to reflect new time entries submitted by team; draft email to team re: updates to billing records.		2.30	\$700.00	\$1,610.00
Service	12/29/2022	DAS	Audit Thurston entries for fee demand project and correct same.		3.80	\$700.00	\$2,660.00
Service	12/29/2022	DAS	Prepare for team call to discuss fee demand; team call re: fee demand; follow-up meeting with J. Wasserman; review/analyze invoice and spreadsheet and emails re: same.		3.10	\$700.00	\$2,170.00
Service	12/30/2022	DAS	Work on proposal for settlement demand.		1.20	\$700.00	\$840.00
Service	12/30/2022	DAS	Completed audit of Thurston billing records; update billing spreadsheet with additional time entries; work on proposal for fee demand.		1.70	\$700.00	\$1,190.00
Service	01/03/2023	DAS	Conference with D. Dwyer re: fee demand project.		0.60	\$700.00	\$420.00

Service	01/04/2023	DAS	Telephone conference with J. Rue re: Fee Demand Project	0.40	\$700.00	\$280.00
Service	01/04/2023	DAS	Video conference with Class Counsel re: potential for fee demand.	0.90	\$700.00	\$630.00
Service	01/05/2023	DAS	Telephone conference with J. Rue.	0.20	\$700.00	\$140.00
Service	01/05/2023	DAS	Telephone conference with G. Little re: settlement posture.	0.50	\$700.00	\$350.00
Service	01/05/2023	DAS	Video conference with J Rue.	0.70	\$700.00	\$490.00
Service	01/05/2023	DAS	Video Conference with J. Rue re: status update.	0.30	\$700.00	\$210.00
Service	01/06/2023	DAS	Analyze current draft of proposed settlement agreement; draft email to Class Counsel, commenting on response to proposal.	1.00	\$700.00	\$700.00
Service	01/06/2023	DAS	Video conference with Class Counsel re: current draft of settlement proposal.	0.40	\$700.00	\$280.00
Service	01/08/2023	DAS	Telephone conference with J. Rue and J. Wasserman re: settlement terms.	1.40	\$700.00	\$980.00
Service	01/09/2023	DAS	Video conference with J. Rue, C. Reisman, J. Wasserman and K. Haley Rue re: proposal for a counter-offer on latest mark-up of settlement agreement.	1.30	\$700.00	\$910.00
Service	01/10/2023	DAS	Review/respond to email from Class Counsel.	0.10	\$700.00	\$70.00
Service	01/11/2023	DAS	Review team emails in preparation for video conference re: settlement strategy; strategize re: same; notes re: same; video conference with J. Rue.	0.90	\$700.00	\$630.00
Service	01/11/2023	DAS	Review letter from adversary filed with the Court; strategize with J. Coyle re: response to same.	0.70	\$700.00	\$490.00
Service	01/12/2023	DAS	Team video conference to discuss response to conference with Mediator Schneider.	0.70	\$700.00	\$490.00
Service	01/12/2023	DAS	Review draft letter to mediator.	0.20	\$700.00	\$140.00
Service	01/19/2023	DAS	Team call to discuss settlement positions and response to mediator.	0.30	\$700.00	\$210.00
Service	01/20/2023	DAS	Review email traffic on proposed response to Mediator Schneider.	0.10	\$700.00	\$70.00
Service	01/24/2023	DAS	Video conference with J. Rue and J. Wasserman re: continuing settlement	0.40	\$700.00	\$280.00

			negotiations.			
Service	01/24/2023	DAS	Team emails re: update on progress of settlement.	0.30	\$700.00	\$210.00
Service	01/25/2023	DAS	Review/respond to email from Class Counsel.	0.20	\$700.00	\$140.00
Service	01/27/2023	DAS	Review/respond to emails from Class Counsel re: draft email to adversary.	0.20	\$700.00	\$140.00
Service	01/31/2023	DAS	Video Conference with Settlement Team to discuss State's latest proposal and response to same.	0.70	\$700.00	\$490.00
Service	01/31/2023	DAS	Video conference with Class Counsel to discuss particulars of counter-proposal.	0.20	\$700.00	\$140.00
Service	01/31/2023	DAS	Review file to determine most recent form of Class Notice; draft email to circulate same.	0.60	\$700.00	\$420.00
Service	02/02/2023	DAS	Telephone call with J. Rue re: "handshake deal" and next steps.	0.30	\$700.00	\$210.00
Service	02/02/2023	DAS	Video conference with trial team re: potential to distribute settlement agreement.	0.50	\$700.00	\$350.00
Service	02/03/2023	DAS	Review/revise draft J. Rue letter.	0.40	\$700.00	\$280.00
Service	02/03/2023	DAS	Video conference with class counsel and team members to discuss latest updates.	1.10	\$700.00	\$770.00
Service	02/04/2023	DAS	Work on Walsh update to Master Fee Spreadsheet.	4.60	\$700.00	\$3,220.00
Service	02/05/2023	DAS	Continue to work on Walsh updated invoice.	2.00	\$700.00	\$1,400.00
Service	02/05/2023	DAS	Additional work on updating Walsh billing entries; input Coyle & Morris January 2023 invoice.	1.80	\$700.00	\$1,260.00
Service	02/06/2023	DAS	Review email from R. Thurston; update files re: same; emails to/from M. Atkinson re: open projects; draft emails to select team members re: updated billing entries for Fee Demand project; review and respond to emails from team members; telephone conference with Class Counsel re: settlement/fee demand issues.	1.90	\$700.00	\$1,330.00
Service	02/06/2023	DAS	Telephone conference with Class Counsel re: email from Mediator re: fee demand deliverables.	0.30	\$700.00	\$210.00
Service	02/06/2023	DAS	Review/respond to email from M. Atkinson;	0.30	\$700.00	\$210.00

			research file re: same; phone call to M. Atkinson.			
Service	02/07/2023	DAS	Telephone conference with J. Rue re: Fee Demand.	0.40	\$700.00	\$280.00
Service	02/07/2023	DAS	Telephone conference with Class Counsel re: Fee Demand.	0.30	\$700.00	\$210.00
Service	02/07/2023	DAS	Update RCGZ billing entries in Master Spreadsheet.	1.20	\$700.00	\$840.00
Service	02/07/2023	DAS	Update RCGZ billing entries in Master Spreadsheet.	1.20	\$700.00	\$840.00
Service	02/07/2023	DAS	Update formulas; work on updates to Master Billing Spreadsheet for Dwyer.	2.40	\$700.00	\$1,680.00
Service	02/08/2023	DAS	Telephone conference with M. Atkinson re: open projects related to Master Billing Spreadsheet.	0.30	\$700.00	\$210.00
Service	02/09/2023	DAS	Review/respond to email from co-counsel re: updated billing entries; email to other team members re: updated billing entries.	0.20	\$700.00	\$140.00
Service	02/09/2023	DAS	Review email from co-counsel re: amendment to billing entries; input same into Master Billing spreadsheet and respond to email with question regarding additional billing entry; address same.	0.30	\$700.00	\$210.00
Service	02/09/2023	DAS	Telephone conference with Class Counsel re: status settlement and status Master Billing Spreadsheet.	0.80	\$700.00	\$560.00
Service	02/09/2023	DAS	Follow-up call with Class Counsel to discuss settlement and fee demand in more detail.	0.80	\$700.00	\$560.00
Service	02/12/2023	DAS	Zoom call with J. Rue and K. Haley re: fee demand.	1.20	\$700.00	\$840.00
Service	02/14/2023	DAS	Telephone call with Class Counsel to discuss Master Billing spreadsheet; follow-up re: same.	0.30	\$700.00	\$210.00
Service	02/14/2023	DAS	Video Conference with J. Wasserman re: fee demand and master spreadsheet.	1.90	\$700.00	\$1,330.00
Service	02/14/2023	DAS	Telephone call with Class Counsel.	0.10	\$700.00	\$70.00
Service	02/15/2023	DAS	Video conference with settlement team.	0.90	\$700.00	\$630.00
Service	02/15/2023	DAS	Review historical correspondence with amici regarding settlement.	0.40	\$700.00	\$280.00
Service	02/17/2023	DAS	Telephone and video conference with J.	1.90	\$700.00	\$1,330.00

			Rue, followed by video conference with fee demand team.			
Service	02/21/2023	DAS	Conduct follow-ups regarding outstanding invoices; compile Pro Formas for production.	0.30	\$700.00	\$210.00
Service	02/21/2023	DAS	Work on draft proposed Rule 502(d) Consent Order.	0.30	\$700.00	\$210.00
Service	02/21/2023	DAS	Continue follow-up work on outstanding invoices; prepare Wasserman Invoice; prepare Dwyer Invoice.	1.60	\$700.00	\$1,120.00
Service	02/21/2023	DAS	Telephone conference with J. Wasserman re: fee demand.	0.50	\$700.00	\$350.00
Service	02/21/2023	DAS	Telephone conference with J. Rue re: Fee Demand.	0.30	\$700.00	\$210.00
Service	02/22/2023	DAS	Respond to request from co-counsel re: fee demand; phone call with Class Counsel re: preparation for settlement meeting and related issues; phone call with J. Wasserman re: Redacted; emails and analysis re: same.	3.40	\$700.00	\$2,380.00
Service	02/23/2023	DAS	Review letter from co-counsel in preparation for call with Class Counsel; phone call from Class Counsel; draft proposed email to team to update everyone on fee negotiations; zoom conference with J. Rue re: Redacted - Attorney; phone call with Class Counsel re: same.	1.10	\$700.00	\$770.00
Service	02/24/2023	DAS	Review distribution spreadsheet; work on update to spreadsheet to reflect expenses.	0.40	\$700.00	\$280.00
Service	02/24/2023	DAS	Video conference with settlement team regarding settlement parameters and number ranges.	0.90	\$700.00	\$630.00
Service	02/27/2023	DAS	Conference with M. Atkinson re: outstanding Invoices; work on Invoices; attention to analysis of billing entries on invoice; construct several Excel comparisons and confer with M. Atkinson re: same.	2.70	\$700.00	\$1,890.00
Service	02/28/2023	DAS	Phone call from Class Counsel to discuss status of documents to support fee demand; telephone conference with K. Haley re: same; telephone conference with M. Atkinson re: current status of pro forma and corrections needed; briefly review pro forma entries.	1.00	\$700.00	\$700.00
Service	03/01/2023	DAS	Attention to finalizing invoices, including	3.80	\$700.00	\$2,660.00

			review of ELC Invoice and marking all pro formas as subject to confidentiality order; telephone conference with M. Atkinson; video conference with J. Rue and M. Atkinson; analyze master spreadsheet and billing software output for JRA to determine errors.			
Service	03/02/2023	DAS	Update Master Billing Spreadsheet errors found through analysis.	4.20	\$700.00	\$2,940.00
Service	03/03/2023	DAS	Review/analyze rate sheet to be provided to adversary; finalize pro formas for service on adversary; video conference with settlement team; draft email serving pro forma invoices on State.	1.80	\$700.00	\$1,260.00
Service	03/05/2023	DAS	Review letter from counsel for amici in preparation for team meeting; review/analyze draft response.	1.70	\$700.00	\$1,190.00
Service	03/05/2023	DAS	Review/revise draft fee memo.	1.80	\$700.00	\$1,260.00
Service	03/06/2023	DAS	Continue to review/revise draft statement supporting fee demand.	2.40	\$700.00	\$1,680.00
Service	03/06/2023	DAS	Zoom meeting with J. Rue, C. Reisman, G. Little, and J. Wasserman re: amici parties; review/revise/finalize updated summary document.	3.00	\$700.00	\$2,100.00
Service	03/08/2023	DAS	Review/respond to team emails; review analysis of objections to settlement agreement and proposed scenarios.	2.10	\$700.00	\$1,470.00
Service	03/08/2023	DAS	Zoom video conference with settlement team.	1.00	\$700.00	\$700.00
Service	03/13/2023	DAS	Review draft letter to prepare for team meeting (.5); participate in team meeting (1.5).	2.00	\$700.00	\$1,400.00
Service	03/16/2023	DAS	Prepare Master Spreadsheet for circulation and email same to co-counsel.	1.20	\$700.00	\$840.00
Service	03/17/2023	DAS	Finalize Master Spreadsheet and send to adversary.	0.30	\$700.00	\$210.00
Service	03/23/2023	DAS	Conference with J. Rue re: strategy for client communications regarding current settlement agreement.	0.70	\$700.00	\$490.00
Service	03/23/2023	DAS	Telephone conference with Class Counsel and D.O.; draft follow-up email to D.O.	0.70	\$700.00	\$490.00
Service	03/30/2023	DAS	Telephone conference with J. Rue to plan for Redacted - Attorney .	1.00	\$700.00	\$700.00

Service	03/30/2023	DAS	Video conference with settlement team regarding request for bracket from Mediator.	0.70	\$700.00	\$490.00
Service	03/31/2023	DAS	Video Conference with J. Rue re: calculating settlement range.	0.70	\$700.00	\$490.00
Service	04/02/2023	DAS	Work on spreadsheet to determine settlement range.	2.20	\$700.00	\$1,540.00
Service	04/07/2023	DAS	Team Video Conference to discuss potential additions to team.	0.80	\$700.00	\$560.00
Service	04/07/2023	DAS	Telephone conference with J. Rue re: Redacted - Attorney	0.50	\$700.00	\$350.00
Service	04/10/2023	DAS	Conference with Class Counsel related to Redacted - Attorney Work-Product	0.60	\$700.00	\$420.00
Service	04/10/2023	DAS	Video conference with J. Rue re: claims of B(3) class.	1.00	\$700.00	\$700.00
Service	04/11/2023	DAS	Review/revise draft joint letter to Judge Hillman.	0.30	\$700.00	\$210.00
Service	04/12/2023	DAS	Telephone call from Class Counsel; draft email to co-counsel, requesting information regarding any fees accrued since their last submissions.	0.30	\$700.00	\$210.00
Service	04/14/2023	DAS	Prepare for call to discuss process of motion for preliminary approval.	1.90	\$700.00	\$1,330.00
Service	04/17/2023	DAS	Video conference with J. Rue re: project related to analysis of issue related to Redacted	0.60	\$700.00	\$420.00
Service	04/17/2023	DAS	Zoom Conference with J. Rue re: new developments in settlement based on telephone call with Judge Schneider.	0.50	\$700.00	\$350.00
Service	04/18/2023	DAS	Conference call with J. Rue to discuss State's counter-offer.	1.20	\$700.00	\$840.00
Service	04/18/2023	DAS	Prepare for and participate in video conference with J. Rue, S. Edwards and F. Geier to discuss Redacted - Attorney Work-Product	1.10	\$700.00	\$770.00
Service	04/19/2023	DAS	Video meeting with client C.P. (had to leave meeting early).	0.80	\$700.00	\$560.00
Service	04/19/2023	DAS	Rejoin video conference with J. Rue, S. Edwards, and client C.P.	0.30	\$700.00	\$210.00

Service	04/20/2023	DAS	Update settlement analysis to provide more detailed information.	0.70	\$700.00	\$490.00
Service	04/20/2023	DAS	Draft email to research team re: status of assignments.	0.20	\$700.00	\$140.00
Service	04/20/2023	DAS	Video conferences with J. Rue and K. Rue re: settlement proposal and ability to accept same; work on spreadsheet re: same.	1.20	\$700.00	\$840.00
Service	04/20/2023	DAS	Prepare for and participate in meeting with S. Edwards and F. Geier re: research in Redacted - Attorney Work-Product; meeting with K. Rue; draft email summary of both meetings and provide same to Class Counsel, together with updated settlement analysis.	1.50	\$700.00	\$1,050.00
Service	04/21/2023	DAS	Video conference with class counsel to discuss parameters for response to State's settlement offer.	1.30	\$700.00	\$910.00
Service	04/21/2023	DAS	Draft email to J. Wasserman re: settlement analysis.	0.30	\$700.00	\$210.00
Service	04/21/2023	DAS	Draft email to settlement team re: Redacted	0.20	\$700.00	\$140.00
Service	04/21/2023	DAS	Update proposed distribution plan in connection with analysis of settlement offer from NJDOE; draft explanatory email to Settlement Team.	0.80	\$700.00	\$560.00
Service	04/25/2023	DAS	Telephone conference with J. Rue.	0.60	\$700.00	\$420.00
Service	04/26/2023	DAS	Phone call with Class counsel regarding Redacted	0.80	\$700.00	\$560.00
Service	04/28/2023	DAS	Review revised version of Release prepared by J. Wasserman; telephone conference with J. Wasserman.	1.20	\$700.00	\$840.00
Service	04/28/2023	DAS	Video conference with J. Rue and J. Wasserman.	1.70	\$700.00	\$1,190.00
Service	05/10/2023	DAS	Video Conference with Settlement Team to discuss latest updates from Judge Schneider.	0.70	\$700.00	\$490.00
Service	05/11/2023	DAS	Review/respond to team email addressing on-going issues with Judge Schneider and counter-demand to the State.	5.40	\$700.00	\$3,780.00
Service	05/12/2023	DAS	Call with J. Rue re: update on settlement discussions.	0.60	\$700.00	\$420.00
Service	05/19/2023	DAS	Telephone conference with J. Wasserman.	0.20	\$700.00	\$140.00
Service	05/23/2023	DAS	Draft letter to Judge Hillman, requesting	0.30	\$700.00	\$210.00

adjournment of motion filing date.						
Service	05/24/2023	DAS	Video Conference with J. Rue and C. Reisman regarding form of notice and application for preliminary approval.	0.80	\$700.00	\$560.00
Service	05/30/2023	DAS	Assemble motion package for Motion for Preliminary Approval and circulate to co-counsel.	1.50	\$700.00	\$1,050.00
Service	06/09/2023	DAS	Finalize motion package.	1.20	\$700.00	\$840.00
Service	07/11/2023	DAS	Appear for hearing in Camden, NJ on motion for preliminary approval of settlement and motion related to challenge to Class Counsel; related travel.	6.00	\$700.00	\$4,200.00
Service	07/18/2023	DAS	Review/revise draft letter brief in support of cross-motion.	1.80	\$700.00	\$1,260.00
Service	07/20/2023	DAS	Review/revise draft brief, notice of motion and certification; draft proposed form of Order.	3.50	\$700.00	\$2,450.00
Service	07/31/2023	DAS	Review emails with proposals for resolution; telephone conference with J. Morris and M. Baldassare.	1.50	\$700.00	\$1,050.00
Service	08/01/2023	DAS	Review/revise/comment on draft proposal to resolve disagreement among counsel; internal emails re: same.	1.30	\$700.00	\$910.00
Service	08/07/2023	DAS	Review/revise draft letter to Court.	0.60	\$700.00	\$420.00
Service	08/22/2023	DAS	Appear for Court Conference in Camden, NJ, and related travel.	6.20	\$700.00	\$4,340.00
Service	08/22/2023	DAS	Final preparation for court conference.	0.80	\$700.00	\$560.00
					Total	\$295,470.00

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
3044	04/03/2024	\$295,470.00	\$0.00	\$295,470.00
			Outstanding Balance	\$295,470.00
			Amount in Trust	\$0.00

Total Amount Outstanding \$295,470.00

Please make all amounts payable to: Coyle & Morris LLP

Please pay within 30 days.

By check or money order to: (please reference invoice number)

Coyle & Morris LLP
201 Littleton Rd., Ste. 210
Morris Plains, NJ 07950

Or via credit card at:

[https://app.clio.com/link/v2/2/2/](https://app.clio.com/link/v2/2/2/7e7b5341d0902213cf1917920245facb?hmac=81943a28dc6a72541365e5f388ee6ea7674ade21cf228196912fec08f3963811)

[7e7b5341d0902213cf1917920245facb?hmac=81943a28dc6a72541365e5f388ee6ea7674ade21cf228196912fec08f3963811](https://app.clio.com/link/v2/2/2/7e7b5341d0902213cf1917920245facb?hmac=81943a28dc6a72541365e5f388ee6ea7674ade21cf228196912fec08f3963811)