

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

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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,

Civil Action No. 19-cv-12807

v.

NEW JERSEY DEPARTMENT OF  
EDUCATION; KEVIN DEHMER,  
Interim Commissioner of Education, in  
his official capacity,

Defendants.

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**DECLARATION OF GREGORY G. LITTLE  
IN SUPPORT OF MOTION FOR ATTORNEYS' FEES  
FOR EDUCATION LAW CENTER**

I, Gregory G. Little, hereby declare:

1. I am an attorney at law, admitted to the Bar of the State of New York.

I am currently Chief Trial Counsel at the Education Law Center (ELC).

2. This declaration is based upon my personal knowledge, including my discussion and correspondence with my colleagues, co-counsel, and opposing counsel. If called to testify, I could testify competently to the facts set forth in this declaration.

3. I submit this declaration in support of the Classes' Unopposed Motion for Final Approval of Settlement Agreement and Attorneys' Fees, attached to the Declaration of Catherine Merino Reisman as Exhibit 1.

4. ELC is a nonprofit organization headquartered at 60 Park Place, Suite 300, Newark, New Jersey 07102 that engages in legal and policy advocacy on behalf of public school children in New Jersey and across the United States. ELC promotes educational equity through coalition building, policy initiatives, communications, research, and litigation at the state and federal levels.

5. From March 1, 2022 until the Order appointing substitute Class Counsel dated October 27, 2023 (ECF No. 530), I was the sole ELC attorney who represented Plaintiffs.

6. In 41 years, I have led trial teams in more than fifty trials in state and federal courts nationwide. While working at the U.S. Securities and Exchange Commission (SEC), I was Chief Trial Counsel for the Southeast Region of the United States. In that role, I was responsible for all SEC litigation throughout the Southeast of the United States, and was involved obtaining and enforcing

injunctions obtained at trial and in settlements. As Associate General Counsel for Phillip Morris, I managed scores of outside counsel in defending (i) a plethora of tobacco class actions at all stages of litigation including, especially relevant here, class action trials across the country, (ii) State Attorney General litigation in all 50 states, and (iii) related securities litigation matters that arose during my tenure. As a litigation partner with White & Case, I represented numerous Fortune 100 companies domestically and internationally. It was at White & Case that I began to work (*pro bono*) on education litigation matters, first assisting ELC in *Abbott v. Burke* in 2011 (*Abbott XXI*), in a remand by the New Jersey Supreme Court to the Honorable Peter Doyne, A.S.C.J. (now retired) for a full evidentiary hearing, for findings of fact regarding the impact of state funding on the quality of public education across New Jersey.

7. In the decade since the remand in *Abbott XXI*, I have had extensive experience in education litigation, especially at the trial stage. I currently serve as Chief Trial Counsel for ELC, in which role I was (i) lead trial counsel in a successful two month trial against the State of New York on behalf of children from eight small city school districts, (ii) lead trial counsel in litigation on behalf of children in Schenectady against the State of New York where we ultimately obtained the return of over 4 billion dollars to the education budget and (iii) trial counsel against New

York City and the State of New York on behalf of children who were denied access to resources necessary to participate in virtual classrooms.

8. I recently served as lead trial counsel in an IDEA class action on behalf of all public school children in Flint Michigan who were exposed to lead in their water. The case resulted in an unprecedented agreement (i) providing the children of Flint public schools with universal screenings for learning disabilities and (ii) creating a neurodevelopmental center where deeper assessments can be done.

9. In this lawsuit, I served as lead trial counsel since being admitted *pro hac vice*. As lead trial counsel, I spent extensive time working with Thomas J. O’Leary preparing for trial. I also participated actively in the settlement negotiations that led to the Settlement Agreement and Consent Order being presented to the Court for approval.

10. When I left White & Case in 2017, the hourly rate being charged for my time was \$ 1,200 well above the \$ 700 hourly rate being sought for my time in this matter.

11. The billing reports for my time through February 2023 are attached as Exhibit 1. In this matter, through February 3, 2023, I billed 574.65 hours.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 5, 2024

/s/ Gregory G. Little  
Gregory G. Little

# Education Law Center

60 Park Place, Suite 300  
Newark, NJ 07102  
Phone: 973-624-1815 | Fax: 973-624-7339

## INVOICE

Invoice Date: February 27, 2023  
Invoice Amount: \$402,255.00

### Matter: Class Action CP v. NJDOE

<b>Attorney's Fees</b>					
1/7/2022	Review of correspondence between USDOE and NJDOE with attachments	G.L.	700.00	2.50	\$1,750.00
1/7/2022	Zoom call discuss status of trial	G.L.	700.00	1.00	\$700.00
1/11/2022	Zoom call discuss issues of trial	G.L.	700.00	1.00	\$700.00
1/12/2022	Prepare for and participate in Zoom call re Judge Hillman pre-trial	G.L.	700.00	1.50	\$1,050.00
1/13/2022	Number of calls and e-mails and Zoom re pre-trial conference	G.L.	700.00	2.00	\$1,400.00
1/15/2022	Zoom call re pre-trial conference	G.L.	700.00	1.00	\$700.00

1/18/2022	Zoom call to discuss pre-trial prep	G.L.	700.00	1.00	\$700.00
1/19/2022	Pre-trial prep and Zoom re publicity	G.L.	700.00	1.25	\$875.00
1/19/2022	Review "hot docs" as contained in 56.1 statement on summary judgement and class cert decision	G.L.	700.00	3.50	\$2,450.00
1/20/2022	Zoom call re trial prep and 56.1 statement	G.L.	700.00	1.75	\$1,225.00
1/20/2022	Review of overview chart re 54 witness and who will be responsible for handling them	G.L.	700.00	2.50	\$1,750.00
1/21/2022	Preliminary overview of trial planning and Zoom	G.L.	700.00	3.75	\$2,625.00
1/23/2022	Review and comment on 23b2 motion for cert	G.L.	700.00	2.00	\$1,400.00
1/24/2022	Review and edit 23b2 class cert reply brief	G.L.	700.00	1.75	\$1,225.00
1/24/2022	Review and edit opposition to states SJ motion	G.L.	700.00	2.50	\$1,750.00
1/25/2022	Zoom call re witness prep and trial exhibits	G.L.	700.00	1.50	\$1,050.00
1/25/2022	Review top 10 special ed cases as applicable to class action	G.L.	700.00	3.00	\$2,100.00
1/26/2022	Zoom call re trial prep & logistics	G.L.	700.00	1.00	\$700.00

1/28/2022	Zoom call re trial prep and logistics	G.L.	700.00	1.00	\$700.00
1/28/2022	Review Rule 11 sanctions motion	G.L.	700.00	1.00	\$700.00
1/28/2022	Review reply brief to sanctions motion	G.L.	700.00	1.00	\$700.00
1/29/2022	Discussion re best NJDOE arguments and coordination of prepping plaintiff witnesses	G.L.	700.00	2.00	\$1,400.00
1/29/2022	Zoom call re same	G.L.	700.00	1.00	\$700.00
1/29/2022	Preparation of plaintiff timelines	G.L.	700.00	1.25	\$875.00
1/31/2022	Zoom meeting re CP plaintiff timelines	G.L.	700.00	2.00	\$1,400.00
1/31/2022	Review of defendants exhibits	G.L.	700.00	3.00	\$2,100.00
2/1/2022	T/c with Rue and Eric Harrison re potential testimony by district lawyers	G.L.	700.00	1.50	\$1,050.00
2/1/2022	Meeting with Rue re background of case	G.L.	700.00	5.00	\$3,500.00
2/2/2022	Brainstorming session with Rue re trial strategy	G.L.	700.00	4.00	\$2,800.00
2/3/2022	Review depositions of CMR A., Dominic R., Carolyn M., John W.	G.L.	700.00	5.50	\$3,850.00

2/4/2022	Pre-trial Zoom to discuss next 18 days before trial checklist and assignments	G.L.	700.00	1.50	\$1,050.00
2/5/2022	Review plaintiffs deposition transcripts	G.L.	700.00	7.50	\$5,250.00
2/6/2022	Review of Ehling deposition and exhibits	G.L.	700.00	2.00	\$1,400.00
2/6/2022	Review of Bass deposition and exhibits	G.L.	700.00	3.00	\$2,100.00
2/7/2022	Review transcript of oral argument on motion to dismiss; review pleadings on SJ's and replies, class action	G.L.	700.00	7.50	\$5,250.00
2/8/2022	Review plaintiffs deposition transcript - Osborn	G.L.	700.00	1.00	\$700.00
2/8/2022	Review plaintiffs deposition transcript - Paredes	G.L.	700.00	2.00	\$1,400.00
2/8/2022	Review plaintiffs deposition transcript - Perry	G.L.	700.00	1.50	\$1,050.00
2/8/2022	Review plaintiffs deposition transcript - Strunk	G.L.	700.00	2.00	\$1,400.00
2/8/2022	Review plaintiffs deposition transcript - Sweeten	G.L.	700.00	1.00	\$700.00
2/9/2022	Review Judge Sanders transcript	G.L.	700.00	1.00	\$700.00
2/10/2022	Review motion to certify 23(b)(2) & 23(b)(3)	G.L.	700.00	3.00	\$2,100.00



2/11/2022	T/c with team in preparation for pre-trial hearing	G.L.	700.00	2.00	\$1,400.00
2/11/2022	Preparation of witness list and sequence and trial statements	G.L.	700.00	4.00	\$2,800.00
2/12/2022	Finalize and circulate outline of case-in-chief	G.L.	700.00	3.00	\$2,100.00
2/13/2022	Preparation of revised intro to proposed finding of fact and conclusion of law	G.L.	700.00	2.50	\$1,750.00
2/17/2022	T/c's and e-mails re NJDOE discussions	G.L.	700.00	2.00	\$1,400.00
2/18/2022	Zoom call re prep for meeting with court	G.L.	700.00	1.00	\$700.00
2/19/2022	Discussion re dropping certain plaintiffs	G.L.	700.00	1.00	\$700.00
2/20/2022	Discussion with trial team re post 12/31/20 discovery and deliberative process	G.L.	700.00	4.00	\$2,800.00
2/21/2022	Calls and e-mails to prepare for hearing with court	G.L.	700.00	2.00	\$1,400.00
2/22/2022	Prepare for and attend Zoom hearing	G.L.	700.00	3.00	\$2,100.00
2/28/2022	Discussion of witness sequence and summaries	G.L.	700.00	2.00	\$1,400.00
3/2/2022	Discussion of whether to class counsel as witnesses	G.L.	700.00	1.00	\$700.00

3/4/2022	Discussion with Rue & O'Leary re discovery and objections	G.L.	700.00	1.50	\$1,050.00
3/7/2022	Discussion, calls, and texts re assignment before Judge Hillman	G.L.	700.00	6.80	\$4,760.00
3/8/2022	Prepare for and attend Zoom and post hearing analysis and discussions	G.L.	700.00	4.00	\$2,800.00
3/9/2022	Draft letter to court re supplementary discovery, Zoom call re supplemental discovery	G.L.	700.00	2.00	\$1,400.00
3/16/2022	T/c's re scope of 30(b)(6) notices	G.L.	700.00	3.00	\$2,100.00
3/18/2022	Finalizing 30(b)(6) notices	G.L.	700.00	1.00	\$700.00
3/22/2022	Prepare for and lead order of proof discussion for trial	G.L.	700.00	2.00	\$1,400.00
3/23/2022	Review and discuss Rota dep exhibits	G.L.	700.00	1.50	\$1,050.00
4/1/2022	Review Rota dep exhibits	G.L.	700.00	2.00	\$1,400.00
4/2/2022	Prepare for and attend Rota deposition and post deposition discovery	G.L.	700.00	4.50	\$3,150.00
4/5/2022	Zoom call re strategy session	G.L.	700.00	1.00	\$700.00
4/5/2022	Preparation for Ehling deposition and review of exhibits	G.L.	700.00	6.00	\$4,200.00

4/6/2022	Review and discuss proposed injunction	G.L.	700.00	2.50	\$1,750.00
4/6/2022	Prepare for NJDOE 30(6)(b) deposition	G.L.	700.00	4.00	\$2,800.00
4/7/2022	Review for Ehling and Bass deposition	G.L.	700.00	7.50	\$5,250.00
4/8/2022	Prepare and take Ehling/NJDOE deposition	G.L.	700.00	7.00	\$4,900.00
4/12/2022	T/c's discussion re Moscowitz deposition	G.L.	700.00	2.00	\$1,400.00
4/13/2022	Pre & post deposition discussion and attending via Zoom, Moscowitz deposition	G.L.	700.00	6.00	\$4,200.00
4/14/2022	T/c's re proposed mediation	G.L.	700.00	1.75	\$1,225.00
4/15/2022	Zoom call re J Hillman's order and mediation	G.L.	700.00	1.00	\$700.00
4/18/2022	T/c's re mediation	G.L.	700.00	1.00	\$700.00
4/20/2022	T/c w/ Dryzga re potential for J. Hillman to have J. Skahill preside over mediation and discussion	G.L.	700.00	2.50	\$1,750.00
4/20/2022	Prep for Bass deposition	G.L.	700.00	4.00	\$2,800.00
4/21/2022	T/c with trial team and letter to J. Hillman	G.L.	700.00	1.50	\$1,050.00

4/21/2022	Bass deposition prep	G.L.	700.00	5.00	\$3,500.00
4/27/2022	Zoom call re status of deposition	G.L.	700.00	1.00	\$700.00
4/29/2022	Prepare for and participate in Zoom call re deposition and settlement strat	G.L.	700.00	1.00	\$700.00
5/2/2022	Discussion re settlement proposal and next steps	G.L.	700.00	2.00	\$1,400.00
5/5/2022	Preparation and discussion re settlement positions	G.L.	700.00	1.50	\$1,050.00
5/8/2022	Prepare outline of case in chief; discuss same	G.L.	700.00	4.00	\$2,800.00
5/9/2022	Preparation for Judge Bass deposition	G.L.	700.00	5.00	\$3,500.00
5/10/2022	Review of docs for Bass deposition	G.L.	700.00	3.50	\$2,450.00
5/11/2022	Review Ehling transcripts to prepare for Bass deposition and take Bass deposition	G.L.	700.00	8.50	\$5,950.00
5/12/2022	Review Moscowitz deposition in preparation for Bass deposition	G.L.	700.00	2.50	\$1,750.00
5/17/2022	Review trial notice and develop 90 day trial plan	G.L.	700.00	5.50	\$3,850.00
5/18/2022	Preparing 90 day plain for trial in September	G.L.	700.00	3.00	\$2,100.00

5/19/2022	Develop and discuss witness list and order of proof	G.L.	700.00	4.00	\$2,800.00
5/24/2022	Discussion re coordination with class counsel	G.L.	700.00	1.00	\$700.00
6/1/2022	Zoom call re settlement strat	G.L.	700.00	1.00	\$700.00
6/1/2022	Review, revise, and discuss confidential settlement proposal	G.L.	700.00	2.00	\$1,400.00
6/7/2022	T/c with Dryzga and Rue re mediation	G.L.	700.00	2.50	\$1,750.00
6/7/2022	Prepare for and conduct witness prep meeting with Rebecca Spar	G.L.	700.00	3.00	\$2,100.00
6/9/2022	Prepare for and attend mediation w/ Judge Skahill	G.L.	700.00	5.00	\$3,500.00
6/10/2022	Review and discuss Flint settlement w/ co-counsel	G.L.	700.00	1.50	\$1,050.00
6/19/2022	Revise proposed settlement agreement and t/c's w/ co-counsel	G.L.	700.00	2.00	\$1,400.00
6/21/2022	T/c's re settlement proposal	G.L.	700.00	2.50	\$1,750.00
6/23/2022	Discussion w/ co-counsel re third circuit class rulings	G.L.	700.00	1.00	\$700.00
7/19/2022	Trial planning Zoom call	G.L.	700.00	2.00	\$1,400.00

8/17/2022	Review order of proof and preparing cross outline of Bass and Ehling	G.L.	700.00	6.00	\$4,200.00
8/18/2022	Preparing stock outlines of plaintiffs testing	G.L.	700.00	3.00	\$2,100.00
8/19/2022	Review of Hillman's orders re class certification and incorporating into cross outlines; t/c's with co-counsel	G.L.	700.00	5.00	\$3,500.00
8/21/2022	Editing press statement on class cert order	G.L.	700.00	1.00	\$700.00
8/22/2022	Series of calls re potential damages claims post trial	G.L.	700.00	2.00	\$1,400.00
8/24/2022	T/c's with counsel re notice issues for B3 class	G.L.	700.00	2.50	\$1,750.00
8/25/2022	Review trial opening and drafting demonstrations	G.L.	700.00	4.00	\$2,800.00
8/26/2022	Review and revise proposed finding of fact and conclusion of law	G.L.	700.00	6.50	\$4,550.00
8/27/2022	Finalize findings of fact and conclusion of law	G.L.	700.00	2.00	\$1,400.00
8/28/2022	Prepare direct exam for Jenny Valverde with exhibits	G.L.	700.00	3.00	\$2,100.00
8/30/2022	Witness prep for Valverde and summary of outline	G.L.	700.00	3.50	\$2,450.00
8/30/2022	Witness prep with Valverde	G.L.	700.00	3.00	\$2,100.00

8/30/2022	Witness prep with Marvin	G.L.	700.00	2.50	\$1,750.00
8/31/2022	Review NJDOE's findings of fact and conclusions of law	G.L.	700.00	2.00	\$1,400.00
9/1/2022	Trial prep - Final run-through on opening statements, Valverde direct, and Ehling cross	G.L.	700.00	6.00	\$4,200.00
9/1/2022	T/c's and e-mails with team re likelihood of trial starting and practice opening	G.L.	700.00	4.50	\$3,150.00
9/2/2022	Zoom conference and t/c's re trial adjournments and next steps	G.L.	700.00	1.75	\$1,225.00
9/5/2022	Prepare for hearings before Judge Hillman	G.L.	700.00	2.50	\$1,750.00
9/6/2022	Prepare for and attend pretrial hearing and conference with NJDOE re open issues	G.L.	700.00	6.00	\$4,200.00
9/7/2022	Address motion in limine and stipulated exhibits	G.L.	700.00	3.00	\$2,100.00
9/8/2022	E-mails and analysis re NJDOE breach of representations to the court	G.L.	700.00	2.00	\$1,400.00
9/14/2022	Review and preparation for cts zoom conference on 9/19	G.L.	700.00	3.00	\$2,100.00
9/19/2022	Prepare for and attend zoom hearing with Judge Hillman; post hearing analysis	G.L.	700.00	4.00	\$2,800.00
9/22/2022	Preparation of exhibit books for Jenny, Bass, and Ehling	G.L.	700.00	6.00	\$4,200.00

9/26/2022	E-mails and analysis of third circuit granting in part and denying in part interlocutory appeal	G.L.	700.00	3.00	\$2,100.00
9/27/2022	Discussions re sequence of plaintiffs testimony, witness outlines, and demonstrations	G.L.	700.00	6.00	\$4,200.00
9/28/2022	Practice opening and revise cross of Ehling and Bass	G.L.	700.00	5.00	\$3,500.00
9/29/2022	Develop trial prep plan for October	G.L.	700.00	3.00	\$2,100.00
9/30/2022	Work on demonstrations for opening and direct/cross	G.L.	700.00	5.00	\$3,500.00
10/10/2022	Review Moscowitz quotes and deposition; call re opening powerpoint	G.L.	700.00	4.00	\$2,800.00
10/12/2022	Prepare for and attend zoom meeting re mock opening	G.L.	700.00	3.00	\$2,100.00
10/13/2022	Review results of driven accountability on USDOE findings of compliance	G.L.	700.00	2.00	\$1,400.00
10/22/2022	Review draft letter Judge Hillman, comments and discussion	G.L.	700.00	1.00	\$700.00
10/22/2022	Draft demonstratives and review outlines of plaintiff directs and incorporating individual plaintiff stories into opening	G.L.	700.00	4.00	\$2,800.00
10/26/2022	Prepare for and discuss interviews with district lawyers	G.L.	700.00	2.50	\$1,750.00
10/26/2022	Review CP depositions	G.L.	700.00	2.00	\$1,400.00



10/28/2022	T/c with Labin re upcoming conference with Judge Hillman	G.L.	700.00	.25	\$175.00
11/1/2022	Internal discussions re settlement and mediations	G.L.	700.00	2.00	\$1,400.00
11/2/2022	Prepare for and attend hearing before Judge Hillman; practice run through exhibits at court house	G.L.	700.00	4.00	\$2,800.00
11/3/2022	Prepare for and attend mediation	G.L.	700.00	6.00	\$4,200.00
11/6/2022	Review of revised settlement discussions and multiple conversations with Rue, Reisman, and O'Leary	G.L.	700.00	3.00	\$2,100.00
11/7/2022	Zoom call re settlement	G.L.	700.00	.75	\$525.00
11/8/2022	Phone calls re settlement	G.L.	700.00	1.50	\$1,050.00
11/9/2022	Zoom call re settlement discussion	G.L.	700.00	1.25	\$875.00
11/11/2022	Review and discuss draft settlement offers	G.L.	700.00	1.25	\$875.00
11/15/2022	T/c re mediation call with NJDOE and review of latest redline	G.L.	700.00	1.00	\$700.00
11/16/2022	Zoom call re settlement	G.L.	700.00	1.00	\$700.00
11/21/2022	Review and discuss draft consent order	G.L.	700.00	1.50	\$1,050.00

11/26/2022	Review drafts of proposed redlines of settlement offers	G.L.	700.00	1.00	\$700.00
11/27/2022	Mediation prep on Zoom	G.L.	700.00	1.50	\$1,050.00
11/28/2022	Mediation session in person	G.L.	700.00	7.50	\$5,250.00
12/1/2022	Review, discuss, and revise settlement agreement re compliance deadline	G.L.	700.00	.75	\$525.00
12/1/2022	Review and revise timelines for plaintiffs	G.L.	700.00	2.75	\$1,925.00
12/1/2022	T/c's re settlement and extending compliance date	G.L.	700.00	1.50	\$1,050.00
12/2/2022	Revise and practice opening statement	G.L.	700.00	4.50	\$3,150.00
12/3/2022	Revising opening, reviewing orders granting motion to certify class and denying motions	G.L.	700.00	3.50	\$2,450.00
12/4/2022	Prepare cross exam of Judge Bass	G.L.	700.00	5.00	\$3,500.00
12/5/2022	Prepare cross exam of Ehling	G.L.	700.00	4.50	\$3,150.00
12/6/2022	Review drafts and prepare cross exam of Sanders	G.L.	700.00	3.75	\$2,625.00
12/6/2022	Review plaintiffs time lines	G.L.	700.00	2.00	\$1,400.00

12/7/2022	Revise direct exam of J. Valverde	G.L.	700.00	3.00	\$2,100.00
12/7/2022	Review direct exam of Rebecca Spar	G.L.	700.00	2.50	\$1,750.00
12/12/2022	Review opening and demonstratives	G.L.	700.00	5.00	\$3,500.00
12/13/2022	Review defendants motions for S.J. and opposition to plaintiffs S.J. in preparation for openings	G.L.	700.00	3.00	\$2,100.00
12/14/2022	Prepare mock crosses for plaintiffs	G.L.	700.00	4.25	\$2,975.00
12/14/2022	Prepare for and participate in Zoom settlement	G.L.	700.00	2.25	\$1,575.00
12/15/2022	Practice and revise opening statement; cross of Bass, Ehling, and Sanders	G.L.	700.00	5.00	\$3,500.00
12/20/2022	Review motion to stay and trial implications of DOE's statement of steps taken to comply with IDEA	G.L.	700.00	3.00	\$2,100.00
12/21/2022	Review revised outlines of plaintiffs	G.L.	700.00	3.00	\$2,100.00
12/22/2022	Revise direct outline for Valverde, Spar	G.L.	700.00	4.00	\$2,800.00
12/26/2022	T/c's re joint motion to stay	G.L.	700.00	3.00	\$2,100.00
12/27/2022	Review of reply brief and t/c's re same	G.L.	700.00	2.00	\$1,400.00

1/9/2023	Draft opening outline	G.L.	700.00	2.75	\$1,925.00
1/10/2023	Revise Ehling and Bass cross	G.L.	700.00	2.35	\$1,645.00
1/11/2023	Revise Bass cross, review Bass depositions, revise demonstratives	G.L.	700.00	4.25	\$2,975.00
1/12/2023	Revise Ehling cross, review Ehling depositions, revise demonstratives	G.L.	700.00	3.00	\$2,100.00
1/13/2023	Review deps and Gerhard summaries on preparation of federal days chart	G.L.	700.00	3.50	\$2,450.00
1/14/2023	Research and t/c's re ALJs as adverse witness when called in our case in chief	G.L.	700.00	2.50	\$1,750.00
1/15/2023	Generic draft of district lawyer cross examinations	G.L.	700.00	1.75	\$1,225.00
1/17/2023	T/c w/ Rue and review claims for misrepresentation	G.L.	700.00	3.00	\$2,100.00
1/18/2023	Zoom call w/ O'Leary and Gerhard's re graphics	G.L.	700.00	1.50	\$1,050.00
1/19/2023	Review best Moscowitz quotes for inclusion into opening	G.L.	700.00	2.00	\$1,400.00
1/20/2023	Review draft consent order and t/c's w/ Reisman and O'Leary	G.L.	700.00	2.00	\$1,400.00
1/23/2023	Calls w/ Gerhard and O'Leary and revision of opening statement and revise order of proof	G.L.	700.00	4.25	\$2,975.00

1/25/2023	Revise demonstratives for direct, cross, and openings	G.L.	700.00	3.50	\$2,450.00
1/26/2023	Review plaintiffs depositions and O'Leary's summaries of same, and review timelines for inclusion into opening statements	G.L.	700.00	5.25	\$3,675.00
1/26/2023	Prepare direct outlines of Jennifer Valverde and Rebecca Spar	G.L.	700.00	4.25	\$2,975.00
1/28/2023	Review Moscowitz examination	G.L.	700.00	1.25	\$875.00
1/29/2023	Practice and revise opening statement	G.L.	700.00	3.50	\$2,450.00
1/30/2023	Prepare cross examination for Sanders	G.L.	700.00	4.50	\$3,150.00
1/30/2023	Prepare mock cross and witness prep for Lateefa Giliam	G.L.	700.00	2.00	\$1,400.00
1/30/2023	Prepare mock cross and witness prep for Yonathan Haile-Selassie	G.L.	700.00	1.75	\$1,225.00
1/31/2023	Review opening, revise demonstratives, revise cross examination of Bass and Ehling	G.L.	700.00	6.75	\$4,725.00
2/1/2023	Prepare, revise, rehearse for, and deliver to plaintiffs' counsel a run through of the opening and summary of the order of proof	G.L.	700.00	7.50	\$5,250.00
2/1/2023	Review and discuss settlement agreement	G.L.	700.00	1.75	\$1,225.00
2/2/2023	T/c's w/ Tom and Catherine re fees and language in the proposed settlement agreement	G.L.	700.00	2.25	\$1,575.00

2/3/2023	T/c's re settlement and Zoom call w/ Judge Schneider	G.L.	700.00	1.25	\$875.00
SUBTOTAL:				574.65	\$402,255.00

**Costs**

SUBTOTAL: \$0.00

**Matter Ledgers**

2/27/2023 Invoice \$402,255.00

SUBTOTAL: \$402,255.00

**Trust Account**

2/27/2023 Previous Balance \$0.00

Available in Trust: \$0.00

TOTAL \$402,255.00  
 PREVIOUS BALANCE DUE \$0.00  
 CURRENT BALANCE DUE AND OWING \$402,255.00