

**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)	Civil No. 1:19-cv-12807
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. and H.Y., individually and on)	
behalf of their 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; KEVIN DEHMER,)	
INTERIM Commissioner of)	
Education, in his official capacity,)	
)	
)	
Defendants.)	

**CERTIFICATION OF ROBERT C. THURSTON, ESQ. IN SUPPORT OF
FEE PETITION PORTION OF FINAL SETTLEMENT**

I, Robert C. Thurston, Esq., declare and certify as follows:

1. I am an attorney at law, admitted to practice before this Court and co-Class Counsel in this matter.

2. I make this certification based on my own personal knowledge and am capable of testifying to all of the facts contained herein if called upon to do so.

3. I graduated law school in 1987 and was first admitted to the bar of the State of Pennsylvania that year, then admitted to the bar of the State of New Jersey in 1988, and also admitted to the bar of the State of Illinois in 1992. Further, I have been at various times admitted to various other federal court bars, including the Third, Sixth, and Ninth Circuits and the U.S. Supreme Court. (*See* ECF #469-2, ¶33 and Exh. G attached thereto.)

4. I have focused my practice to the field of special education law over the last fifteen (15) years, primarily in New Jersey. As will be noted from my curriculum vitae, I have handled cases at all levels, including appeals to the 3rd, 6th, and 9th Circuit Courts of Appeal and two petitions for certiorari to the U.S. Supreme Court. I have also handled several cases in this Court, as well as other federal district courts around the United States including without limitation Hawaii, Tennessee, and the U.S. Virgin Islands. I have previously submitted my credentials to this Court, which was one of the reasons I was appointed as Co-Class Counsel. (*See* ECF ##469-2, 505 and 530.)

5. I am familiar with the fees charged by counsel in special education, civil rights and disability matters within this District and the Third Circuit. This is a highly complex area of law, requiring expertise in the substantive law of special education as well as litigation experience in both the administrative level as well as the state and federal court systems.

6. Although my standard rate for individual plaintiffs in special education cases is \$525.00 per hour,¹ my hourly rate is \$585.00 for purposes of this class action, especially given my years admitted to the bar, level of expertise in special education litigation, and that I filed the related purported class action captioned *J.A., et al. v. New Jersey Dept. of Education, et al.*, U.S.D.C. D.N.J. Civil No. 1:18-cv-09580 which is currently pending in this Court.

7. In another matter, this Court approved my previous rates of \$375.00 and \$400.00 per hour and noted in its Opinion that those rates were on the lower end of the market. *See Gresko v. Pemberton Twp. BOE*, U.S.D.C. D.N.J. Civil Action No. 1:19-cv-00638 (NLH)(KMW) (Opinion, U.S.D.J. Hillman, October 13, 2020, ECF #42, p. 24.)²


¹ Note: This is the hourly rate reflected on my invoices attached because that is automated within my billing system.

² This opinion can be found online at Google Scholar at this link:

<https://bit.ly/33elBzy>

8. The invoices reflecting my time working on this case on behalf of Plaintiffs/Class **through February 29, 2024** are attached hereto and reflect **798 hours of work** at the billable rate of \$585.00 per hour totaling **\$466,537.50**. (True and correct copies of the referenced invoices are attached hereto as Exhibit A.)

Dated: March 3, 2024

By: 
Robert C. Thurston, Esq.



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/5/2020	2074

Bill To

Due Date
8/5/2020

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/7/2020	Receive and review letter via ECF from DAG Soranno to Judge Hillman re procedures and responding to Amended Complaint, in addition to other Orders relating to JA and CP cases; legal analysis re same;	0.4	260.00
7/8/2020	Receive and review Text Order via ECF tolling time for State Defendants' to respond to Amended Complaint;	0.1	65.00
7/10/2020	Receive and review via ECF very lengthy letter from DAG to Judge Hillman re consolidation and table of comparisons with CP case; legal analysis re same; email to Steering Cmte re same;	0.9	585.00
7/14/2020	Email exchanges with Steering Cmte counsel re status of consolidation of cases and legal strategy re same;	0.3	195.00
7/15/2020	Receive and review Joint Costs and Fees Sharing Agreement re consolidation of cases and legal analysis of same; email to Steering Cmte counsel re questions of same;	0.5	325.00
7/15/2020	Prepare, file and serve Appearance in CP case via ECF;	0.3	195.00
7/15/2020	Email exchange with CP class counsel re status of joint prosecution and cases;	0.3	195.00
7/15/2020	Review State Defendants' response to Judge Hillman's Order re comparing and contrasting two class actions (JA case and CP case); review Second Amended Complaint in CP case and Judge Hillman's 6/29 Order; prepare, file and serve letter response to State Defendants' letter as per Order;	0.7	455.00
7/20/2020	Receive and review via ECF State Defendants' Reply re Judge Hillman's Order on comparison of two class action cases;	0.4	260.00
7/22/2020	Receive and review multiple emails from co-counsel re FOIA request for documents and legal analysis re same attaching documents;	0.7	455.00
7/22/2020	Multiple email exchanges with co-counsel re OPRA responses from State and status of discovery requests;	0.4	260.00
7/24/2020	Begin draft of discovery requests in CP case;	0.5	325.00
7/26/2020	Email to class action co counsel re J.A. appeal complaint in DP IEE case re related case issue;	0.1	65.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/5/2020	2074

Bill To

Due Date
8/5/2020

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/26/2020	Receive and review response to FOIA request from USDOE re 45 Day Rule and NJDOE noncompliance via email with attached documents; legal analysis re same; email to co counsel re same;	2.7	1,755.00
7/26/2020	Continue draft of discovery requests in CP case;	1.9	1,235.00
7/28/2020	Email exchange with co counsel re responses to FOIA requests and legal advice on potentially missing documents and on 1/17/2020 proposed guidelines;	0.2	130.00
7/28/2020	Multiple email exchanges with co-counsel re status of federal case and impact / legal strategy on new JA appeal;	0.5	325.00
7/29/2020	Review of USOSEP FOIA response documents for legal analysis and incomplete / missing information; email to co counsel re same;	0.8	520.00
		Total	\$7,605.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/3/2020	2085

Bill To

Due Date
9/3/2020

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/12/2020	Receive and review Text Order via ECF re briefing schedule and scope on issue of expedited trial in CP case;	0.2	130.00
8/24/2020	Begin draft of discovery requests; email exchange with co-counsel re same;	1.2	780.00
8/31/2020	Receive and review email from plaintiffs' co-counsel in CP case re legal advice / strategy on discovery and request for consolidation of injunction and hearing;	0.3	195.00
8/31/2020	Receive and review draft letter brief on consolidation of injunction and hearing and seeking legal advice re same; legal analysis of same;	0.9	585.00
		Total	\$1,690.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
10/4/2020	2097

Bill To

Due Date
10/4/2020

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/23/2020	Receive and review lengthy email from co-counsel Rue re information to assist in drafting discovery, RPDs;	0.5	325.00
9/1/2020	Review Plaintiffs' proposed letter brief to Judge Hillman re consolidation of injunction and trial and discovery period; email to co-counsel re same;	0.5	325.00
9/2/2020	Receive and review email from plaintiffs' counsel in CP case re legal advice / strategy on discovery and request for consolidation of injunction and hearing;	0.1	65.00
9/3/2020	Receive and review via ECF letter brief by co-counsel on behalf of plaintiffs to Judge Hillman re injunction and expediting trial under Rule 65; analysis re same;	0.2	130.00
9/4/2020	Receive and review email from co-counsel re NJDOE data responsive to OPRA request and analysis of violations of 45 Day Rule;	0.5	325.00
9/5/2020	Email to co-counsel re USDOE data and analysis of violations of 45 Day Rule on state-by-state basis;	0.2	130.00
9/16/2020	Email exchange with co-counsel re NY class action and violations that impact NJ class action; legal analysis and discussion re same;	0.3	195.00
9/17/2020	Receive and review via ECF Appearance of DAG Kalisky on behalf of all defendants in CP case;	0.1	65.00
9/18/2020	Multiple email exchanges with co counsel re NJDOE response to OPRA requests and documents that assist in action and preparation for discovery requests;	1.4	910.00
9/18/2020	Receive and review via ECF State Defendants' Opposition to Motion to Consolidate PI and Expedited Hearing on Merits; legal analysis re same;	1.2	780.00
9/22/2020	Begin draft of discovery requests - RPD, Rogs, RTAs;	1.1	715.00
9/22/2020	Receive and review lengthy email from co-counsel re convening call to discuss adding new case to class action (related case) and preliminary injunction;	0.3	195.00
9/23/2020	Receive and review via ECF multiple notices of withdrawal of DAG Jensen;	0.2	0.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
10/4/2020	2097

Bill To

Due Date
10/4/2020

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/23/2020	Multiple email communications with co-counsel re draft Reply on consolidation of preliminary injunction and expedited trial on merits;	0.5	325.00
9/23/2020	Receive and review multiple drafts of Reply on consolidation of preliminary injunction and expedited trial on merits via email from co-counsel; legal analysis re same;	0.8	520.00
9/23/2020	Continue draft of discovery requests - RPD, Rogs, RTAs;	1.7	1,105.00
9/24/2020	Continue draft of discovery requests - RPD, Rogs, RTAs;	2.3	1,495.00
9/24/2020	Email to co counsel re legal advice and no objection to addition of related case;	0.1	65.00
9/24/2020	Receive and review lengthy email from co-counsel Giles re additional related case with summary of facts and attaching DP petition re same in preparation for conf call;	0.7	455.00
9/24/2020	Multiple email exchanges with co-counsel re acceptance of supplemental case to class action;	0.3	195.00
9/24/2020	Receive and review via ECF Plaintiffs' Reply in support of Motion to Consolidate PI and Expedited Hearing on Merits; legal analysis re same;	0.4	260.00
9/25/2020	Continue draft of discovery requests - RPD, Rogs, RTAs; email to co-counsel attaching drafts for comment;	0.8	520.00
		Total	\$9,100.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
11/2/2020	2104

Bill To

Due Date
11/2/2020

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
10/12/2020	Prepare lengthy status report letter to clients re case and companion C.P. Case; email same to clients;	1.1	715.00
10/19/2020	Receive and review email from co-counsel re follow on class action complaint and legal discussion / advice re same; email to co-counsel re input on discussion;	1.1	715.00
10/20/2020	Multiple email exchanges with co-counsel re supplemental case and legal discussion and strategy re adding to class action case and whether legal issues are addressed in class action;	0.4	260.00
10/22/2020	Numerous email exchanges with co-counsel re impact of new case on pending class actions and legal advice re same;	0.6	390.00
10/25/2020	Prepare lengthy email re legal analysis and strategy on attorney's fees issue for non-prevailing parties in class action suit for input from co-counsel;	0.9	585.00
		Total	\$2,665.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
12/3/2020	2113

Bill To

Due Date
12/3/2020

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
11/13/2020	Receive and review email from co-counsel re mediation of class actions;	0.1	65.00
11/16/2020	Numerous email exchanges with co-counsel re liability of LEAs under IDEA as public agency and legal advice and strategy re same;	0.5	325.00
11/18/2020	Multiple email exchanges and legal advice with co-counsel re decision in GW v Ringwood Bd of Ed and impact on class action and related issues; legal discussion on strategy in class action and related cases;	0.8	520.00
11/20/2020	Email exchange with co-counsel re legal analysis and impact of recent decisions by Judge Hillman, Judge Vasquez, and Judge Kugler on class actions;	0.2	130.00
11/25/2020	Receive and review via ECF Order denying certification of class without prejudice and order to meet and confer on preliminary injunction hearing in CP case; legal analysis re same; email to co-counsel re same;	1.7	1,105.00
11/25/2020	Prepare status report to clients and email same with legal advice and strategy;	0.5	325.00
11/25/2020	Email exchanges with co counsel re impact of Judge Hillman's Order on class certification, discovery, and expedited trial and legal analysis and strategy re same;	0.4	260.00
11/30/2020	Multiple email exchanges with co-counsel re NJSIG insurance policy and potential claims for bad faith against intended beneficiaries students with disabilities and related legal issues;	0.8	520.00
12/2/2020	Receive and review via ECF letter from Rue to Judge Williams re Rule 16 Scheduling Conference;	0.2	130.00
		Total	\$3,380.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/3/2021	2119

Bill To

Due Date
1/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/4/2020	Legal research re NJDOE funding from IDEA for FY17-20; analysis re same; email to counsel re same;	0.5	325.00
12/5/2020	Multiple email exchanges with counsel re financial issues raised by USDOE data and State Defendants' defense that OAL internal procedures do not violate IDEA; legal analysis and discussion re same re strategy in class actions;	0.4	260.00
12/5/2020	Receive and review via ECF Text Order setting initial scheduling conference with Judge Williams;	0.1	65.00
12/5/2020	Multiple email exchanges with co-counsel re preparation for 12/17 scheduling conference;	0.4	260.00
12/11/2020	Numerous email exchanges with co-counsel re preparation for scheduling conference call with Judge Williams and State Defendants' proposed discovery plan;	1.8	1,170.00
12/12/2020	Receive and review via email and multiple email exchanges re proposed discovery plan, revisions, and legal strategies re same; legal analysis re same;	1.1	715.00
12/12/2020	Receive and review via email from co-counsel key document re NJOSEP Complaint Investigation Report containing numerous IDEA violations by John Worthington and legal analysis re issues raised therein;	0.9	585.00
12/13/2020	Email exchanges with co-counsel re legal strategy for sharing key documents;	0.2	130.00
12/13/2020	Receive and review via email from co-counsel NJOSEP 2006 Performance Report with "federal days" mentioned (possibly beginning in 2005) and legal analysis in preparation for discovery requests and depositions;	0.8	520.00
12/13/2020	Multiple email exchanges with co-counsel re legal strategy on bifurcation and discovery in preparation for trial and legal advice on potential witnesses;	0.7	455.00
12/14/2020	Receive and review via email proposed ESI protocols; legal analysis of proposed protocol;	0.6	390.00
12/14/2020	Email to co-counsel re proposed ESI protocols with legal advice re same and metadata;	0.1	65.00
		Total	

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
1/3/2021	2119

Bill To

Due Date
1/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/15/2020	Multiple email exchanges with co counsel re legal research and preparation for 12/17 scheduling conference;	1.3	845.00
12/16/2020	Receive and review email from co counsel attaching regulatory duties of Chief ALJ delegated by NJDOE in special ed cases; legal analysis re same;	0.6	390.00
12/17/2020	Prepare for and participate in Scheduling Conference with Magistrate Judge Williams;	1.2	780.00
12/17/2020	Multiple email exchanges with co-counsel re proposed Scheduling Order in light of expedited trial;	0.5	325.00
12/17/2020	Telephone call with co-counsel Rue re legal strategy and legal advice re proposed Scheduling Order in light of expedited trial;	0.5	325.00
12/18/2020	Email exchange with counsel re State Defendants' Rule 26 Disclosures;	0.1	65.00
12/18/2020	Receive and review via ECF Scheduling Order and discovery matters; legal analysis re same;	0.4	260.00
12/21/2020	Multiple email exchanges with co-counsel re draft discovery requests and reference to 2005 Memorandum of Understanding and NJDOE database to ensure compliance with 45 Day Rule;	0.2	130.00
12/22/2020	Receive and review via email from co-counsel proposed settlement consent order and draft cover letter to State Defendants' counsel; legal analysis re same;	0.5	325.00
12/22/2020	Prepare suggested changes to proposed settlement consent order and email to co-counsel re same;	0.3	195.00
12/22/2020	Review documents to locate reference to 2005 Memorandum of Understanding and NJDOE database to ensure compliance with 45 Day Rule; email to co-counsel re same;	0.4	260.00
12/22/2020	Multiple email exchanges with co-counsel and drafts of discovery requests and proposed Consent Order to State Defendants and impact on JA plaintiffs;	1.7	1,105.00
12/22/2020	Receive and review email from co-counsel re coordination of discovery requests across pending cases;	0.1	65.00
12/23/2020	Receive and review email from co-counsel to State Defendants' counsel attaching letter and proposed Consent Order as settlement offer; legal analysis re same on impact on JA case;	0.5	325.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/3/2021	2119

Bill To

Due Date
1/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/30/2020	Receive and review via email from State Defendants' counsel Rule 26 Initial Disclosures; legal analysis re same;	0.6	390.00
12/31/2020	Prepare lengthy email to co-counsel with legal analysis and advice re State Defendants' Rule 26 Initial Disclosures;	0.3	195.00
12/31/2020	Email exchange with co-counsel re discovery requests to State Defendants, comments, and legal advice re same;	0.2	130.00
		Total	\$11,050.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/3/2021	2127

Bill To

Due Date
2/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/2/2021	Email exchanges with co-counsel re State Defendants' Rule 26 Disclosures and legal strategy re same;	0.2	130.00
1/2/2021	Multiple email exchanges with co-counsel re proposed revisions to draft discovery to NJDOE and legal strategy re same;	0.4	260.00
1/4/2021	Prepare for and participate in conference call to coordinate discovery with CP case, JA case, and other individual cases;	0.8	520.00
1/5/2021	Prepare for and participate in conference call with co-counsel re legal strategy to consolidate cases before Judge Hillman for discovery purposes;	1.3	845.00
1/8/2021	Multiple email exchanges with co-counsel re consolidation and proposed new complaint with other plaintiffs, review of complaint in EK case, mootness issue, injunctive relief against NJDOE, comp ed, and legal advice re same;	2.2	1,430.00
1/8/2021	Receive and review discovery served on State Defendants in CP Class Action and cover letter re same; legal analysis re same and impact on JA Class Action and other individual cases;	2.7	1,755.00
1/9/2021	Email exchange with co-counsel re motion to consolidate cases excluding CP Class Action for discovery only;	0.2	130.00
1/10/2021	Begin draft of Motion to Consolidate for Discovery Only with other pending cases before Judge Hillman;	2.3	1,495.00
1/11/2021	Multiple email exchanges with co-counsel re status of potential additional class plaintiffs and actions / appeals; legal analysis re same and potential consolidation of cases;	0.5	325.00
1/11/2021	Receive and review via email letter from co-counsel to State Defendants' counsel disclosing plaintiffs' names pursuant to confidentiality order; legal analysis re same;	0.3	195.00
1/12/2021	Receive and review email from State Defendants' counsel in CP case serving discovery requests and attaching same; legal analysis re same;	1.7	1,105.00
1/12/2021	Receive and review via ECF filed proposed Stipulated Discovery Confidentiality Order;	0.5	325.00
1/12/2021	Legal analysis of form case transmittal document from NJDOE to OAL and counsel re initial hearing date; email to co-counsel that form states post-hearing briefing is not permitted;	0.5	325.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/3/2021	2127

Bill To

Due Date
2/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/12/2021	Legal research and analysis on Rule 42 consolidation; prepare letter to counsel re proposed consolidation of cases for discovery purposes only and status of 3 cases; email same;	0.4	260.00
1/13/2021	Receive and review via ECF Order entered Stipulated Discovery Confidentiality Order; legal analysis re same;	0.2	130.00
1/14/2021	Review conference call with co-counsel re discovery plan;	0.8	520.00
1/14/2021	Receive and review from co-counsel work product spreadsheet of OAL Decisions from 2018-21; legal analysis re same;	0.9	585.00
1/14/2021	Multiple emails with co-counsel re discovery issues;	0.2	130.00
1/15/2021	Prepare letter to Judge Williams requesting status conference re proposed consolidation of cases for discovery and status of 3 cases; file and serve same via email;	0.4	260.00
1/15/2021	Receive and review via email letter from State Defendants' counsel re objection to consolidation for discovery; legal analysis re same;	0.5	325.00
1/18/2021	Multiple email exchanges with co-counsel re witnesses for depositions and discovery; review proposed amended Rule 26 Disclosures;	0.7	455.00
1/18/2021	Receive and review email from co-counsel attaching proposed amended Joint Discovery Plan, proposed amended ESI protocol, proposed draft confidentiality order, and Rule 26 Disclosures with proposed amendment; legal analysis re same;	1.2	780.00
1/19/2021	Receive and review via email Plaintiffs' Amended Rule 26 Initial Disclosures and cover letter to State Defendants' counsel; legal analysis re same;	0.4	260.00
1/19/2021	Receive and review via ECF text Order re proposed consolidation for discovery purposes only of multiple cases to be discussed during 1/26/21 CMC with Judge Williams;	0.2	130.00
1/19/2021	Multiple email exchanges with co-counsel re discovery responses to State Defendants' requests and amending Rule 26 disclosures with additional witnesses;	0.4	260.00
1/20/2021	Receive and review via email from co-counsel draft responses to discovery requests by State Defendants; legal analysis re same;	1.1	715.00
1/27/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE;	4.1	2,665.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/3/2021	2127

Bill To

Due Date
2/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/28/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE;	3.3	2,145.00
1/28/2021	Receive and review via email Plaintiffs' revised draft of responses to discovery; legal analysis re same;	0.4	260.00
1/29/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE;	4.6	2,990.00
1/30/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE;	2	1,300.00
1/31/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE;	1.1	715.00
		Total	\$23,725.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
3/3/2021	2133

Bill To

Due Date
3/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
2/1/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE;	4.7	3,055.00
2/2/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE;	3.6	2,340.00
2/3/2021	Continue review documents, legal research, and drafting Requests for Admission to NJDOE; prepare final and cover letter re same; serve via email with exhibits;	3.8	2,470.00
2/4/2021	Begin review documents, legal research, and drafting Second Set of Requests for Admission to NJDOE;	2.9	1,885.00
2/5/2021	Continue review documents, legal research, and drafting Second Set of Requests for Admission to NJDOE;	3.5	2,275.00
2/6/2021	Continue review documents, legal research, and drafting Second Set of Requests for Admission to NJDOE;	1.2	780.00
2/7/2021	Continue review documents, legal research, and drafting Second Set of Requests for Admission to NJDOE;	2	1,300.00
2/8/2021	Continue review documents, legal research, and drafting Second Set of Requests for Admission to NJDOE;	4.4	2,860.00
2/9/2021	Continue review documents, legal research, and drafting Second Set of Requests for Admission to NJDOE;	2.7	1,755.00
2/10/2021	Continue review documents, legal research, and drafting Second Set of Requests for Admission to NJDOE; prepare final; prepare cover letter to State Defendants' counsel; serve via email with exhibits;	3	1,950.00
2/11/2021	Receive and review Plaintiffs' discovery responses and letter to State Defendants' counsel re same in CP case;	0.5	325.00
2/12/2021	Email exchanges with co-counsel re settlement negotiations with State Defendants;	0.3	195.00
2/12/2021	Multiple email exchanges with co-counsel re State Defendants' responses to discovery and follow up; legal analysis re same;	0.4	260.00
2/12/2021	Receive and review email from co-counsel re NJDOE presentation on sped dispute resolution system and critical admissions therein; legal analysis re same;	0.5	325.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
3/3/2021	2133

Bill To

Due Date
3/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
2/12/2021	Receive and review email from co-counsel re legal analysis and response to State Defendants' counsel's demand that all communications with witnesses (including communications on new cases) go through the AG's office and preparation of response thereto;	0.2	130.00
2/12/2021	Receive and review State Defendants' document production in CP case; begin review of same;	0.9	585.00
2/12/2021	Receive and review email from co-counsel to DAG Soranno re settlement discussions in CP case and scope of same; legal analysis re same and impact on JA case;	0.3	195.00
2/12/2021	Receive and review email from co-counsel re NJDOE document which admits to months of delay in special ed hearings;	0.3	195.00
2/13/2021	Continue review of State Defendants' document production in CP case; legal analysis re same;	1.4	910.00
2/14/2021	Continue review of State Defendants' document production in CP case; legal analysis re same;	1.3	845.00
2/15/2021	Receive and review email from co-counsel to State Defendants' counsel re meet and confer on discovery in CP case;	0.1	65.00
2/15/2021	Continue review of State Defendants' document production in CP case; legal analysis re same;	2.2	1,430.00
2/16/2021	Multiple email exchanges re settlement discussions with the State in CP case;	0.3	195.00
2/16/2021	Multiple email exchanges with state and agenda issues for meet and confer on discovery disputes in CP case;	0.4	260.00
2/16/2021	Continue review of State Defendants' document production in CP case; legal analysis re same;	1	650.00
2/16/2021	Review documents produced by State Defendants in CP case, legal research, and drafting Third Set of Requests for Admission to NJDOE;	0.3	195.00
2/17/2021	Continue review of State Defendants' document production in CP case; legal analysis re same;	2.5	1,625.00
2/17/2021	Continue review of documents produced by State Defendants in CP case, legal research, and drafting Third Set of Requests for Admission to NJDOE;	0.6	390.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
3/3/2021	2133

Bill To

Due Date
3/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
2/17/2021	Multiple email exchanges with co-counsel re discovery deficiencies of State Defendants in CP case and preparation of meet and confer letter re discovery disputes; legal analysis re same and review of discovery responses re same;	1.1	715.00
2/17/2021	Receive and review via email letter from State Defendants' counsel re supplemental discovery production in CP case;	0.2	130.00
2/18/2021	Continue review of State Defendants' document production in CP case; legal analysis re same;	3.3	2,145.00
2/18/2021	Continue review of documents produced by State Defendants in CP case, legal research, and drafting Third Set of Requests for Admission to NJDOE;	1	650.00
2/18/2021	Receive and review via email meet and confer letter from co-counsel to State Defendants' counsel re discovery disputes and agenda in CP case; legal analysis re same;	0.4	260.00
2/18/2021	Receive and review lengthy email from State Defendants' counsel re discovery disputes, scope of deposition notice, and agenda for meet and confer and need time for response in CP case; legal analysis re same;	0.3	195.00
2/18/2021	Review additional documents produced by NJDOE in CP case; email exchanges with co-counsel re deficiencies and questions about Memoranda of Understanding with OAL;	0.4	260.00
2/18/2021	Receive and review email from co-counsel re draft amended Rule 30(b)(6) Notice to NJDOE; legal analysis re same;	0.3	195.00
2/19/2021	Continue review of documents produced by State Defendants in CP case, legal research, and drafting Third Set of Requests for Admission to NJDOE; prepare final; prepare cover letter re same; serve via email;	2.7	1,755.00
2/19/2021	Email exchanges with co-counsel re NJDOE documents implicating OAL and discussion re subpoena to OAL for documents in CP case and legal impact; legal analysis re same;	0.6	390.00
2/20/2021	Review of NJDOE document production in CP case re OAL role and trainings; legal analysis re same and impact on JA case;	1.2	780.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
3/3/2021	2133

Bill To

Due Date
3/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
2/20/2021	Review recent transmission of case from NJDOE to OAL (2021) and document using term 'federal days' when State Defendants' counsel has denied the use of that term; legal analysis re same and email exchange with co-counsel re same;	0.3	195.00
2/23/2021	Receive and review via email cover letter from co-counsel to State Defendants' counsel and Deposition Notice of Catherine Anthony in CP case;	0.2	130.00
2/23/2021	Receive and review via email draft letter from co-counsel to State Defendants' counsel responding to rolling document production and delay of discovery schedule in general; legal analysis and email approval of same;	0.2	130.00
2/23/2021	Receive and review via email draft Second Amended Rule 30(b)(6) Deposition Notice in CP case;	0.3	195.00
2/23/2021	Email exchanges with State Defendants' counsel re deposition of Anthony and legal issues re same;	0.2	130.00
2/24/2021	Receive and review via email draft subpoena to OAL in CP case; email exchanges with co-counsel re same;	0.4	260.00
2/24/2021	Email exchanges with State Defendants' counsel re Second Amended Rule 30(b)(6) Deposition Notice in CP case;	0.2	130.00
2/25/2021	Download and review State Defendants' document production in CP case; legal analysis re same and potential use in JA and other cases;	2	1,300.00
2/26/2021	Email exchange with co-counsel re service of subpoena on OAL in CP case and conflict of interest with State Defendant's counsel;	0.2	130.00
2/26/2021	Email exchanges with co-counsel re discovery of OAL and ALJs in both CP and JA cases;	0.3	195.00
2/26/2021	Multiple email exchanges with all counsel re depositions of NJDOE and legal analysis re same;	0.4	260.00
2/26/2021	Receive and review via email subpoena on OAL in CP case and electronic service via OAG; legal analysis of same and application to other federal cases;	0.3	195.00
2/26/2021	Receive and review via email correspondence from co-counsel to State Defendants' counsel re intent to serve subpoena on OAL;	0.2	130.00
		Total	\$40,300.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/6/2021	2141

Bill To

Due Date
4/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/1/2021	Email exchanges with co-counsel re depositions and strategy re sharing questions and participation;	0.2	130.00
3/2/2021	Receive and review via email State Defendants' objections to Rule 30(b)(6) deposition notice; legal analysis re same; email to co-counsel re same;	0.5	325.00
3/2/2021	Receive and review via email State Defendants' supplemental document production in CP Case; legal analysis re same;	1.2	780.00
3/4/2021	Multiple email exchanges and discussion among co-counsel re meet and confer with State Defendants' counsel on discovery issues in CP case; legal analysis re same;	0.9	585.00
3/5/2021	Multiple email exchanges with co-counsel re draft letter to Judge Williams re discovery disputes with State Defendants and meet and confer attempts in CP case; email comments re same;	0.6	390.00
3/5/2021	Receive and review via ECF Plaintiffs' Letter to Judge Williams re discovery disputes and delay of Rule 30(b)(6) deposition by State Defendants in CP case; legal analysis re same;	0.5	325.00
3/5/2021	Email exchanges with co-counsel re prior conflicting positions of State Defendants on discovery to be included in meet and confer letter to Judge Williams in CP case;	0.2	130.00
3/8/2021	Receive and review via ECF State Defendants' letter to Judge Williams re discovery dispute; legal analysis re same;	0.3	195.00
3/8/2021	Receive and review Plaintiffs' Second Supplemental document production; legal analysis and review of same;	0.5	325.00
3/9/2021	Receive and review via email letter from co-counsel to State Defendants' attorney requesting supplemental discovery on legislative fiscal estimate re 45 day violations;	0.2	130.00
3/9/2021	Multiple email exchanges with co-counsel re NJDOE and OAL ignoring IDEA violations despite accepting federal funds and misreporting results and legal analysis of how to respond;	0.7	455.00
3/9/2021	Receive and review via ECF Text Order scheduling conference call with Judge Williams re status of discovery disputes;	0.1	65.00
3/10/2021	Prepare for and attend deposition of Cathy Anthony NJDOE;	2.9	1,885.00
3/10/2021	Email exchanges with co-counsel re follow up discovery from Anthony deposition and issues raised;	0.4	260.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/6/2021	2141

Bill To

Due Date
4/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/11/2021	Receive and review letter via email from co-counsel to State Defendants' attorney re follow up document request from Anthony deposition; legal analysis re same;	0.3	195.00
3/16/2021	Receive and review Plaintiffs' supplemental document production to State Defendants in CP case; legal analysis re same and impact on JA case;	0.5	325.00
3/16/2021	Review file and discovery requests; prepare letter to State Defendants' counsel re meet and confer on past due discovery responses;	0.4	260.00
3/17/2021	Email exchanges with co-counsel re legal analysis and strategy on deliberative process issue in CP case;	0.3	195.00
3/17/2021	Receive and review via email letter from State Defendants' counsel re discovery disputes and meet and confer and refusal to respond to discovery;	0.3	195.00
3/18/2021	Multiple email exchanges with co-counsel on CP case re subpoena on OAL, service, and modifying draft;	0.6	390.00
3/19/2021	Receive and review State Defendants' Supplemental responses to RPD, privilege log supplemented, and cover letter in CP case; legal analysis re same;	1.3	845.00
3/22/2021	Legal research re training of ALJs and Perry Zirkel; analyze Zirkel's cv and experience; incorporate into legal arguments; email exchanges with co-counsel re same;	1.8	1,170.00
3/23/2021	Receive and review State Defendants' supplemental document production; legal analysis re same;	1.8	1,170.00
3/23/2021	Receive and review via email from co-counsel subpoenae to OAL and service emails re same; legal analysis re same;	0.4	260.00
3/24/2021	Receive and review transcript from deposition of Anthony in CP case; legal analysis re same and impact on JA case;	1.8	1,170.00
3/24/2021	Begin draft Motion to Consolidate all J.A. cases and L.D. case with class action; legal research re same; review pleadings in each case re same;	2.9	1,885.00
3/25/2021	Prepare letter to Clerk of Court re motion to consolidate as per L.Civ.R. 42.1; file and serve via ECF;	0.2	130.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/6/2021	2141

Bill To

Due Date
4/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/25/2021	Receive and review via ECF notice from clerk re setting motion to consolidate;	0.1	65.00
3/25/2021	Prepare chart comparing cases and claims to be consolidated; prepare final motion to consolidate and supporting papers; legal research re same; file and serve same via ECF; prepare cover letter to Judge Hillman with courtesy copy and email to all counsel;	4.2	2,730.00
3/26/2021	Receive and review via email letter from co-counsel to State Defendants' counsel re discovery deficiencies; legal analysis re same;	0.4	260.00
3/30/2021	Multiple email exchanges with co-counsel re adjournment issue and communications by ALJs and OAL re changing dates to avoid liability under 45 Day Rule;	0.4	260.00
3/30/2021	Extended discussion with co-counsel re OAL and Chief ALJ Bass' response to illegal adjournments and violations of the 45 Day Rule and incorporating excuses into decisions; legal analysis re same and impact on two class actions;	1.4	910.00
3/31/2021	Multiple email exchanges with co-counsel in C.P. case re ALJ adjournments and using COVID as an excuse to violate the 45 Day Rule; legal research re USDOE position on due process hearings and Federal Preemption Doctrine;	1.2	780.00
4/1/2021	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman requesting extension of time to file response to motion to consolidate and proposed Order;	0.3	195.00
4/1/2021	Receive and review via ECF notice of withdrawal of Rousseau as counsel of record for State Defendants; adjust service list re same;	0.1	65.00
4/1/2021	Receive and review via ECF notice of withdrawal of Rousseau as counsel of record for State Defendants in CP case; adjust service list re same;	0.1	0.00
4/1/2021	Email exchanges with State Defendants' counsel re response to Motion to Consolidate and extension of time;	0.2	130.00
4/1/2021	Receive and review email from co-counsel to State Defendants' counsel re discovery outstanding in C.P. case;	0.1	0.00
4/1/2021	Receive and review via email draft Plaintiffs' brief on deliberative process issues and seeking comments from co-counsel in C.P. case;	1.3	845.00

Total



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/6/2021	2141

Bill To

Due Date
4/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
4/5/2021	Receive and review email from State Defendants' counsel re consent for ext of time to non-parties to respond to motion to consolidate;	0.1	65.00
4/5/2021	Receive and review via ECF letter from MTBOE counsel to Judge Hillman requesting extension of time to file response to motion to consolidate;	0.3	195.00
4/5/2021	Receive and review email from State Defendants' counsel to co-counsel on CP case re discovery issues;	0.2	130.00
4/5/2021	Receive and review via ECF letter from VPS counsel to Judge Hillman requesting extension of time to file response to motion to consolidate;	0.3	195.00
4/5/2021	Receive and review email from MTBOE counsel attaching caselaw re intervening parties in motion to consolidate; legal analysis re same;	0.4	260.00
4/5/2021	Multiple email exchanges with co-counsel and discovery re retirement (?) of Peggy McDonald and issues re discovery in CP case;	0.4	260.00
4/5/2021	Email exchange with VPS counsel re opposing motion to consolidate in case where client is not a party; legal analysis re same;	0.3	195.00
4/6/2021	Receive and review via ECF Text Order of status conference 7/13/21 in C.P. case;	0.1	0.00
4/6/2021	Email from co-counsel to State Defendants' counsel re delays in discovery responses in C.P. case;	0.1	0.00
		Total	\$21,710.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
5/3/2021	2148

Bill To

Due Date
5/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
4/6/2021	Receive and review via email revised draft brief in C.P. case on deliberative process privilege and discovery dispute with State Defendants; legal analysis re same;	0.9	585.00
4/7/2021	Receive and review via ECF revised Scheduling Order from the Court and docket dates;	0.2	130.00
4/8/2021	Receive and review via ECF Notice of Appearance of DAG Fichera for State Defendants;	0.1	65.00
4/9/2021	Receive and review via email numerous documents produced by State Defendants and discussion with co-counsel re admissions against interest; multiple email exchanges with co-counsel re legal analysis and strategy;	1.9	1,235.00
4/9/2021	Receive and review via ECF Plaintiffs' Motion to Compel discovery and Text Order setting deadlines before Judge Williams;	0.8	0.00
4/9/2021	Receive and review via email draft Notice of Deposition re NJOSEP database of cases and request for comment in CP case;	0.4	260.00
4/10/2021	Begin draft of RTA 02 in CP case;	0.7	455.00
4/12/2021	Email exchanges with co-counsel re poorly drafted decisions by ALJs and evidence of lack of training and meeting IDEA hearing officer requirements;	0.4	260.00
4/12/2021	Receive and review via email revised draft of 30b6 deposition notice to State Defendants on database; legal analysis and response;	0.4	260.00
4/13/2021	Email exchanges with co-counsel in CP case and State Defendants' counsel re Rule 30(b)(6) Notice of Deposition re NJDOE database of due process case information;	0.4	260.00
4/14/2021	Multiple email exchanges re new DAG / State Defendants' counsel on case, background with Rutgers clinic, and legal analysis of impact on CP and JA class actions;	0.3	195.00
4/14/2021	Email exchanges with co-counsel re discovery dispute over database and spreadsheet of case histories with State Defendants' counsel;	0.2	130.00
4/14/2021	Continue draft of RTA 02 in CP case;	1.3	845.00
4/16/2021	Email exchanges with co-counsel re OAL subpoena and extension of time;	0.2	130.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
5/3/2021	2148

Bill To

Due Date
5/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
4/16/2021	Multiple email exchanges with co-counsel on 504 and ADA issues, exhaustion, and NJAC applied to non-IDEA claims;	0.5	325.00
4/16/2021	Email exchange with co-counsel re exhaustion issues on 504 and ADA claims;	0.8	520.00
4/20/2021	Receive and review via ECF State Defendants' opposition to Plaintiffs' Motion to Consolidate; legal analysis re same;	1.3	845.00
4/20/2021	Receive and review via ECF MTBOE's opposition to Plaintiffs' Motion to Consolidate; legal analysis re same;	1.8	1,170.00
4/20/2021	Receive and review via email State Defendants' counsel letter to co-counsel re dispute over production of NJDOE database of due process cases; legal analysis re same;	0.5	325.00
4/20/2021	Receive and review via email State Defendants' Responses and Objections to Rule 30b6 deposition notice re NJDOE database of due process cases; legal analysis re same;	0.4	260.00
4/21/2021	Receive and review via email draft response by co-counsel to State Defendants' objections to 30b6 depo notice and production of NJDOE database; legal analysis re same;	0.7	455.00
4/22/2021	Email to co-counsel re legal strategy on dispute with State Defendants re production of NJDOE database and application to technology issues;	1.2	780.00
4/22/2021	Email exchanges with co-counsel in CP case and legal research and analysis on production of electronic information via discovery on due process cases;	1.2	780.00
4/23/2021	Amend and supplement Reply in Support of Motion to Consolidate Cases in JA case; additional legal research re same;	1.9	1,235.00
4/23/2021	Email exchanges and research re training materials produced in CP case as issue relating to qualifications of hearing officers;	0.4	260.00
4/23/2021	Receive and review via email letter from co-counsel to State Defendants' counsel re production of database of due process case information and dispute over terminology / semantics;	0.3	195.00
4/23/2021	Receive and review via email Notice of Deposition of MM o/b/o KM in CP case and cover letter of service re same; legal analysis re same;	0.4	260.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
5/3/2021	2148

Bill To

Due Date
5/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
4/23/2021	Receive and review via email Notice of Deposition of AS o/b/o AAS in CP case and cover letter re same; legal analysis re same;	0.4	260.00
4/23/2021	Review documents produced by NJDOE re ALJ training, federal funding, OSEP manual, and forms re legal issues in JA and CP class actions and other related cases;	2.9	1,885.00
4/24/2021	Amend and supplement Reply in Support of Motion to Consolidate Cases in JA case; additional legal research re same;	0.6	390.00
4/25/2021	Amend and supplement Reply in Support of Motion to Consolidate Cases in JA case; additional legal research re same;	1.4	910.00
4/25/2021	Receive and review email from co-counsel acknowledging depo notices;	0.1	0.00
4/26/2021	Prepare letter to Clerk of Court re filing reply brief on Motion to Consolidate Cases as per L.Civ.R. 42.1; file and serve via ECF;	0.2	130.00
4/26/2021	Amend and supplement Reply in Support of Motion to Consolidate Cases in JA case; additional legal research re same; prepare 2nd Decl RCT re Magistrate Judge Williams' comments on consolidating for discovery purposes only; prepare final; file and serve via ECF; prepare letter to Judge Hillman re courtesy copy and serve via mail and email;	3.7	2,405.00
4/27/2021	Receive and review via ECF State Defendants' Opposition to Plaintiffs' Motion to Compel in CP case; legal analysis re same; email to co-counsel with legal strategy re same;	1.2	780.00
4/27/2021	Email exchange with co-counsel re origins of "Federal Days" phrase and discovery related thereto; legal strategy re same;	0.5	325.00
4/27/2021	Receive and review via ECF State Defendants' exhibit to opposition to Motion to Compel in CP case;	0.2	0.00
4/27/2021	Receive and review via email letter from DAG Klika to Judge Williams re courtesy copy of State Defendants' opposition to motion to compel in CP case;	0.1	0.00
4/28/2021	Receive and review via email letter from co-counsel to State Defendants' counsel re missing document not properly identified on privilege log in CP case;	0.2	130.00
4/29/2021	Receive and review email from State Defendants' counsel re response to OAL subpoenae and extension of time in CP case;	0.1	65.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
5/3/2021	2148

Bill To

Due Date
5/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
4/29/2021	Email exchange with State Defendants' counsel re production of document left off privilege log in CP case;	0.1	65.00
4/30/2021	Receive and review email from State Defendants' counsel re meet and confer on production of due process case database in CP case;	0.1	65.00
4/30/2021	Continue draft of RTA 02 in CP case;	2.2	1,430.00
			Total
			\$21,060.00

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
6/3/2021	2155

Bill To

Due Date
6/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/3/2021	Receive and review via ECF Appearance filed by DAG Herlihy on behalf of State Defendants;	0.1	0.00
5/4/2021	Receive and review email from co-counsel re NJDOE database and temporary agreement re production of status reports;	0.1	65.00
5/8/2021	Receive and review via email letter and supplemental production of NJDOE documents in discovery in CP case; begin review of same;	1.6	1,040.00
5/8/2021	Receive and review via email letter and production of OAL documents pursuant to subpoena in discovery in CP case; begin review of same;	2.9	1,885.00
5/10/2021	Multiple email exchanges with counsel re deposition of M.M. Plaintiffs in CP case;	0.3	0.00
5/10/2021	Email exchange with counsel and attaching corrected production of case status reports 2010-20 in CP case; review and legal analysis re same;	0.9	585.00
5/10/2021	Review OAL document production pursuant to subpoena in CP case; legal analysis re same and inadequate response to subpoena; email exchange with co-counsel re addressing violation of subpoena by OAL;	3.1	2,015.00
5/10/2021	Receive and review via email transcript of deposition of CC in CP case; legal analysis re same;	1.2	780.00
5/10/2021	Receive and review via email letters from counsel in CP case re amended NJDOE privilege logs and dispute over content and status;	0.6	390.00
5/11/2021	Email exchange with co-counsel in CP case re OAL production and ALJ timesheets and legal analysis re same;	0.4	260.00
5/12/2021	Receive and review via email from co-counsel in CP case Cert of Rota and NJDOE opposition to OSC in W Morris case shirking responsibility for 45 Day Rule violation; legal analysis re same;	0.6	390.00
5/12/2021	Email exchange with co-counsel in CP case re discovery deficiencies by both NJDOE and OAL;	0.2	130.00
5/12/2021	Receive and review via email OAL supplemental document production in response to subpoena for gap in production and missing documents;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
6/3/2021	2155

Bill To

Due Date
6/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/13/2021	Email exchange and consultation with co-counsel re discovery letters to NJDOE and OAL re deficiencies and comments re same;	0.3	195.00
5/13/2021	Email exchanges with counsel re deposition for 5/14/21;	0.2	0.00
5/14/2021	Review draft letter on discovery deficiency letter to NJDOE and provide comments re same;	0.4	260.00
5/14/2021	Review draft letter on discovery deficiency letter to OAL counsel and excel spreadsheet of time entries and provide comments re same; email discussion re potential conflict of interest;	0.5	325.00
5/14/2021	Receive and review via email from co-counsel letter to NJDOE counsel in CP case re outstanding discovery issues and deficiencies;	0.3	195.00
5/14/2021	Receive and review via email from co-counsel letters to OAL counsel in CP case re discovery deficiencies and noncompliance with subpoenae; legal analysis re same;	0.4	260.00
5/14/2021	Email exchanges with counsel in CP case re depositions;	0.2	0.00
5/14/2021	Lengthy email discussions with co-counsel re legal strategies and discovery relating to OAL and ALJs on their liability under IDEA and imputation to NJDOE;	0.7	455.00
5/15/2021	Email exchanges with counsel in CP case re depositions;	0.2	0.00
5/17/2021	Prepare Status Report to clients and email same;	0.6	390.00
5/17/2021	Lengthy email to co-counsel in CP case re legal strategy and analysis discussions on discovery and issues in case;	0.4	260.00
5/18/2021	Legal analysis re proposed subpoena to OLS in CP case; email to co-counsel with suggested changes re same;	0.2	130.00
5/18/2021	Receive and review via email from co-counsel draft subpoena to Office of Legislative Services (OLS) and Notice of Intent to Serve; legal analysis and comment;	0.4	260.00
5/19/2021	Email exchange and discussion with co-counsel in CP case re discovery issues, contradictory representations by NJDOE in case before Judge Wigenton and ordering transcript, and other sources of discovery;	0.4	0.00
5/19/2021	Telephone call with co-counsel on CP case re legal strategies and advice and discovery pursuits and related legal issues for trial in both class actions before Judge Hillman;	1.4	910.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
6/3/2021	2155

Bill To

Due Date
6/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/21/2021	Receive and review email correspondence from co-counsel to OAL counsel in CP case re noncompliance with subpoena and meet and confer;	0.2	0.00
5/21/2021	Receive and review via email Notice of Intent to Serve Subpoena on Office of Legislative Affairs in CP case served on all counsel;	0.2	130.00
5/21/2021	Extensive email exchanges with co-counsel in CP case re issue of delay in OAL hearing transcripts and impact on 45 Day Rule and class actions;	0.4	260.00
5/22/2021	Receive and review email from co-counsel in CP case re number of cases appealed to federal court;	0.1	65.00
5/22/2021	Receive and review via email from State Defendants' counsel attaching lengthy letter on discovery matters and massive supplemental production of documents, including annual case status reports; review of documents and legal analysis;	2.3	1,495.00
5/24/2021	Email exchange with co-counsel re status of settlement negotiations in CP case and request for Rule 68 Offer of Judgment / Consent Judgment and impact on cases;	0.3	195.00
5/24/2021	Receive and review email from co-counsel attaching proposed Second Request for Production of Document to NJDOE, Third Rule 45 Subpoena to OAL, and Letter to State Defendants' counsel with proposed consent order; legal analysis re same; email exchange re same;	0.7	455.00
5/25/2021	Receive and review email from State Defendants' counsel re ESI protocol draft in CP case;	0.1	0.00
5/25/2021	Receive and review via email Notice of Deposition of LG o/b/o TM in CP case and cover letter re same; email response by co-counsel re defending deposition;	0.3	195.00
5/25/2021	Multiple email exchanges with co-counsel re settlement negotiations, legal strategy, and legal analysis if NJDOE resolves 45 Day Rule violations and impact on case;	0.6	390.00
5/25/2021	Receive and review via email proposed letter on ESI protocol to submit to court and email to State Defendants' counsel re same in CP case;	0.4	260.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
6/3/2021	2155

Bill To

Due Date
6/3/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/26/2021	Receive and review email from co-counsel to OAL counsel re deficiencies in responses to subpoena and meet and confer request in CP case;	0.1	0.00
5/26/2021	Receive and review via email letter from co-counsel to NJDOE counsel re supplemental document production and legal issues re same and proposed consent order on sample case files in CP case;	0.4	260.00
5/26/2021	Email exchange with counsel re subpoena on OAL for documents and acknowledgement of service;	0.3	195.00
5/26/2021	Receive and review email from co-counsel to State Defendants' counsel acknowledging deposition of L.M. in CP case;	0.1	0.00
5/26/2021	Receive and review via email Plaintiffs' Second RPD to State Defendants and cover letter re same in CP case;	0.4	260.00
5/26/2021	Receive and review via email Plaintiffs' Notice of Intent to Serve Subpoena on OAL and cover letter re same in CP case;	0.3	195.00
5/27/2021	Receive and review via email letter from State Defendants' counsel to co-counsel demanding production of all documents obtained via subpoenae in CP case;	0.1	65.00
5/27/2021	Receive and review email from co-counsel approving changes to discovery demand letter draft in CP case;	0.1	0.00
5/28/2021	Lengthy email discussions with co-counsel in both class actions re discovery issues and obstruction by both NJDOE and OAL to accessing documents and depositions and potential motions to Judge Williams;	0.6	390.00
		Total	\$16,185.00

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
7/6/2021	2162

Bill To

Due Date
7/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
6/1/2021	Email exchange with counsel re rescheduling deposition of MM in CP case;	0.2	0.00
6/4/2021	Receive and review email from co-counsel re case filed in 2021 and document showing that NJDOE is still using "federal days" language despite 2019 USDOE noncompliance letter;	0.3	195.00
6/4/2021	Email exchange between counsel re MM deposition in CP case;	0.2	0.00
6/7/2021	Receive and review via email from co-counsel OAL privilege logs in response to two subpoenae in CP case; legal analysis re same;	0.5	325.00
6/7/2021	Receive and review email from co-counsel to state defendants' counsel re motion to compel NJDOE re deliberative process objection and whether OAL will abide by Court's ruling on motion in CP case;	0.1	65.00
6/8/2021	Receive and review via email draft letter from co-counsel in CP case to State Defendants' counsel re deficiencies in discovery and attempt at meet and confer; legal analysis re same;	0.4	260.00
6/9/2021	Receive and review via email letter from co-counsel to state defendants' counsel re outstanding discovery issues in CP case; legal analysis re same;	0.2	130.00
6/9/2021	Receive and review via email letter from state defendants' counsel to co-counsel re LG document production in CP case;	0.1	65.00
6/9/2021	Receive and review via email Amended Notice of Deposition of MM in CP case;	0.2	130.00
6/10/2021	Receive and review email from co-counsel to state defendants' counsel re production of documents in CP case;	0.1	0.00
6/14/2021	Email exchanges with counsel in CP case re MM deposition;	0.2	0.00
6/15/2021	Email exchanges between co counsel and State Defendants counsel re depositions in CP case;	0.3	0.00
6/15/2021	Receive and review email from State Defendants' counsel with letter and attached documents for LG deposition in CP case;	0.4	260.00
6/17/2021	Receive and review via email from co-counsel to State Defendants' counsel proposed revisions to ESI protocol in CP case; legal analysis re same;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
7/6/2021	2162

Bill To

Due Date
7/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
6/17/2021	Email exchange between co-counsel and State Defendants' counsel re motion to compel OAL documents and ext of time for meet and confer;	0.1	65.00
6/21/2021	Receive and review via ECF Text Order requiring statement as per L.Civ.R. 7.1.1;	0.1	65.00
6/25/2021	Receive and review via ECF Trial Notice from Judge Hillman for October 2021 and notice of Pretrial conference for 9/16/21 in CP case;	0.2	130.00
6/25/2021	Email exchanges with co-counsel re trial notice and conference call strategy session;	0.1	65.00
6/25/2021	Receive and review email from co-counsel re proposal to request status conference on discovery disputes with NJDOE in CP case; legal analysis re input on same;	0.1	65.00
6/28/2021	Receive and review via email from co-counsel proposed letter to Judge Williams re discovery dispute and proposed subpoena and deposition notice to OAL in CP case; legal analysis re same; email to co-counsel re same;	0.4	260.00
6/28/2021	Receive and review via email from co-counsel letter to State Defendants' counsel and Notice of Deposition of Rota in CP case; legal analysis re same;	0.3	195.00
6/28/2021	Email exchange with co-counsel re strategy conference call for Plaintiffs' counsel in light of trial notice in CP case;	0.1	65.00
6/28/2021	Email exchanges with co-counsel in CP case re OAL subpoena and proposed amendments;	0.2	130.00
6/28/2021	Prepare L.Civ.R. 7.1.1 statement for Plaintiffs; file and serve via ECF;	0.2	130.00
6/28/2021	Receive and review via ECF letter from co-counsel to Judge Williams re discovery dispute with NJDOE, request for status conference, and proposed consent order on discovery in CP case; legal analysis re same;	0.4	260.00
6/28/2021	Prepare for and participate in conference call with co-counsel re legal strategy and advice on preparation for trial and completing discovery in CP case;	1.1	715.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
7/6/2021	2162

Bill To

Due Date
7/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
6/28/2021	Receive and review via email letter from co-counsel to NJDOE counsel re notice of intent to serve OAL subpoena for organization deposition and including numerous topics in CP case;	0.3	195.00
6/28/2021	Amend and supplement proposed topics for OAL organization deposition and exchange with co-counsel in CP case;	0.4	260.00
6/29/2021	Prepare draft Plaintiffs' 2nd Set of RFAs to NJDOE in CP case; review documents and prepare as exhibits to RFAs re same;	2.9	1,885.00
6/29/2021	Multiple emails between counsel re Rule 30(b)(6) NJDOE designee deposition, topics re same, and coordination with rulings by Judge Williams re same in CP case;	0.3	195.00
6/29/2021	Receive and review via email letter from co-counsel to OAL counsel re subpoenae for depositions of ALJ Sanders and ALJ Bass and enclosing subpoenae for service in CP case;	0.2	130.00
6/29/2021	Receive and review via email letter from co-counsel to NJDOE counsel re Notice of Intent to Serve Subpoenae on OAL in CP case;	0.2	130.00
6/29/2021	Review State Defendants' responses to RFA 01 and legal analysis re wording in preparation for RFA 02 in CP case;	1.1	715.00
6/30/2021	Amend and supplement draft Plaintiffs' 2nd Set of RFAs to NJDOE in CP case; review documents and prepare as exhibits to RFAs; email co-counsel re draft;	6.8	4,420.00
6/30/2021	Email exchange with co-counsel re new related case transferred to Trenton and away from Judge Hillman and CP case;	0.1	65.00
6/30/2021	Email exchanges with counsel re deposition of Rota in CP case;	0.2	130.00
6/30/2021	Receive and review via email lengthy letter from co-counsel to State Defendants' counsel re discovery disputes to be addressed during 7/13 status conference with Judge Williams in CP case; legal analysis re same and impact on JA case;	0.4	260.00
6/30/2021	Receive and review via email supplemental document production (repeat) by OAL in response to subpoena in CP case;	0.3	0.00
6/30/2021	Receive and review via email from OAL counsel supplemental document production pursuant to subpoena in CP case; legal analysis re same;	0.9	585.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
7/6/2021	2162

Bill To

Due Date
7/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
6/30/2021	Receive and review lengthy email from co-counsel re discovery disputes with OAL and conference re deliberative process privilege in CP case; discussion among Plaintiffs' co-counsel group re strategy and draft response letter;	0.5	325.00
6/30/2021	Receive and review via email second amended Notice of Deposition of MM in CP case;	0.2	130.00
6/30/2021	Receive and review via ECF text Order re discovery issues raised in letter filed with Court to be addressed during 7/13 status conference in CP case;	0.1	65.00
6/30/2021	Receive and review email from co-counsel in CP case re documents and legal analysis re deposition of former Chief ALJ Sanders and preparation for same; review same for numerous cases including JA case;	1.1	715.00
6/30/2021	Receive and review via email letter from OAL counsel to co-counsel re discovery disputes related to subpoenae to OAL and meet and confer process re same;	0.2	130.00
		Total	\$14,105.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/1/2021	Email exchange with co-counsel re draft RFAs in CP case and service of same to be timely;	0.2	130.00
7/1/2021	Receive and review via email from co-counsel to State Defendants' counsel final version of RFA 02 and exhibits as service of same in CP case;	0.3	195.00
7/1/2021	Amend and supplement draft RFAs with co-counsel in CP case;	0.6	390.00
7/2/2021	Receive and review via ECF Text Order to advise court of anticipated length of trial in CP case;	0.1	65.00
7/6/2021	Receive and review via email letter from co-counsel to NJDOE counsel re depo notice of Worthington in CP case;	0.2	130.00
7/6/2021	Receive and review via email letter from co-counsel to NJDOE counsel re 3d amended 30(b)(6) depo notice to NJDOE in CP case;	0.2	130.00
7/6/2021	Receive and review via ECF and email letter from co-counsel to Judge Williams re discovery dispute with OAL and request for status conference in CP case; receive and review email from co-counsel to OAL counsel re 7/13 status conference re same;	0.3	195.00
7/6/2021	Telephone call and multiple email exchanges with co-counsel re depositions of ALJ Sanders and Worthington in CP case; preparation for same and legal analysis for ethics issues in contacting / interviewing Worthington;	0.7	455.00
7/6/2021	Multiple email exchanges with co-counsel re deposition of John Worthington, preparation for same, documents involved, and strategy for favorable witness testimony or informal interview / affidavit;	0.7	455.00
7/6/2021	Receive and review via email letter from NJDOE to co-counsel re alleged discovery deficiencies and Plaintiffs' production of documents; legal analysis re same;	0.3	195.00
7/7/2021	Email exchanges and legal discussion re NJSEP 45 Day Report and preparation for deposition of ALJ Sanders in CP case;	0.3	195.00
7/7/2021	Receive and review via email from State Defendants' counsel re error in subpoena to Worthington in CP case;	0.1	0.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/7/2021	Receive and review email from co-counsel re communications to ALJ Sanders re NJSEP 45 Day Report and various attachments; legal analysis in preparation for deposition of ALJ Sanders in CP case;	1.4	910.00
7/7/2021	Email exchange with co-counsel re telephone interview with witness John Worthington and outcome of communication in CP case;	0.2	130.00
7/7/2021	Preliminary telephone interview with witness John Worthington and outcome of communication in CP case;	0.4	260.00
7/7/2021	Receive and review via ECF letter from co-counsel to Judge Hillman raising several issues in response to Order to advise court on length of trial and discovery obstacles making such estimate impossible at this time in CP case;	0.2	130.00
7/7/2021	Receive and review via ECF text Order re modifying status conference and docketing same in CP case;	0.1	65.00
7/7/2021	Receive and review via email letter from co-counsel to NJDOE counsel re discovery disputes and Plaintiffs' document productions in CP case;	0.3	195.00
7/7/2021	Email exchanges re depositions in CP case and status of discovery generally;	0.2	130.00
7/8/2021	Prepare letter to Judge Hillman re supplemental information on motion to consolidate - State Defendants' filing of motion to dismiss in other J.A. case; file and serve via ECF;	0.3	195.00
7/8/2021	Receive and review via ECF letter from DAG Soranno to Judge Williams re discovery disputes and deadline in CP case;	0.3	195.00
7/8/2021	Receive and review via email letter from NJDOE counsel to co-counsel re alleged document production deficiencies and details re same in CP case;	0.2	130.00
7/8/2021	Multiple email and letter exchanges between co-counsel and NJDOE counsel re alleged discovery deficiencies in CP case;	0.4	260.00
7/8/2021	Multiple email exchanges with counsel re deposition of John Worthington in CP case;	0.2	130.00
7/9/2021	Receive and review via ECF letter from NJDOE counsel to Judge Hillman re trial length in CP case;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/9/2021	Receive and review via email from co-counsel re status of CP case and DAGs;	0.2	130.00
7/9/2021	Receive and review via ECF letter from co-counsel to Judge Williams re discovery deadline and outstanding issues in CP case;	0.3	195.00
7/9/2021	Receive and review via email from co-counsel to ALJ Bass re subpoena and notice of deposition in CP case;	0.3	195.00
7/9/2021	Receive and review via email from co-counsel to DAG Soranno re and attaching amended notice of intent to serve subpoena on ALJ Bass for depo and correspondence re same in CP case;	0.3	195.00
7/9/2021	Receive and review via email from co-counsel email exchanges with substitute DAG re various OAL discovery issues in light of DAG Fichera out on medical leave and need to have discovery issues resolved;	0.2	130.00
7/10/2021	Receive and review via ECF letter from NJDOE counsel to Judge Williams re discovery deadline in CP case;	0.3	195.00
7/10/2021	Receive and review via email lengthy correspondence from co-counsel to OAL counsel re various subpoenas, service of same, and lack of response thereto to support issues before Judge Williams with numerous attachments in CP case;	0.6	390.00
7/12/2021	Review and legal analysis of documents responsive to Zirkel subpoena; email exchanges with co-counsel re same;	0.7	455.00
7/12/2021	Receive and review via email letter from NJDOE counsel re representation of and deposition of Worthington in CP case;	0.2	130.00
7/12/2021	Multiple email exchanges with co-counsel re ALJ trainings and documents obtained and further investigation into lack of training on 45 Day Rule in CP case;	0.4	260.00
7/12/2021	Email to NJDOE counsel re deposition of Worthington and proceeding on 7/29 in CP case;	0.1	65.00
7/13/2021	Several email exchanges with counsel re deposition of Worthington in CP case;	0.3	195.00
7/13/2021	Receive and review via ECF text Order re status conference for 7/21 in CP case;	0.1	65.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/13/2021	Initial review of documents in preparation for Worthington deposition in CP case; receive and review email from co-counsel with additional documents related to Worthington and other depositions; legal analysis re same;	1.1	715.00
7/14/2021	Multiple email exchanges with co-counsel re data on hours and federal funds spent by OAL on due process hearings; review documents re same; legal analysis re same;	1.6	1,040.00
7/14/2021	Receive and review via email proposed draft Motion to Compel OAL compliance with subpoena in CP case; legal analysis and research re same;	1.4	910.00
7/16/2021	Lengthy email to co-counsel re comments and research on proposed draft Motion to Compel OAL compliance with subpoena in CP case;	1.3	845.00
7/16/2021	Email to NJDOE counsel re status of Worthington deposition after acceptance of representation in CP case;	0.1	65.00
7/16/2021	Receive and review email from NJDOE counsel re status of Worthington deposition and not going forward on 7/29 in CP case;	0.1	65.00
7/16/2021	Receive and review email from co-counsel re draft motion to compel to OAL in CP case and suggested changes; legal analysis re same;	0.1	65.00
7/19/2021	Telephone call with co-counsel Dwyer re strategy and discovery disputes in CP case; email to all co-counsel re same in preparation for 7/21 status conference call with Judge Williams;	1.1	715.00
7/20/2021	Email to NJDOE counsel inquiring as to further status of Worthington deposition in CP case;	0.1	65.00
7/21/2021	Prepare for and participate in status conference call with Judge Williams on CP case;	1.5	975.00
7/21/2021	Receive and review via ECF Motion to Enforce Subpoena on OAL, brief, decl Oleary, and associated documents re same in CP case;	1.2	780.00
7/21/2021	Receive and review via email lengthy letter from co-counsel to State Defendants' counsel re discovery disputes, motion to compel, discovery deadline and trial date;	0.4	260.00
7/21/2021	Multiple email exchanges with co-counsel re final discovery issues and deposition coordination;	0.3	195.00

		Total	
--	--	--------------	--



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/21/2021	Preparation for Worthington depo in CP case; review additional documents re same;	2.2	1,430.00
7/21/2021	Receive and review via ECF minute entry from 7/21/21 status conference with Judge Williams in CP case;	0.1	0.00
7/21/2021	Prepare for and participate in Plaintiffs' joint counsel zoom call re case strategy, discovery, and legal issues in CP case;	1.3	845.00
7/22/2021	Multiple email exchanges with counsel and co-counsel re discovery deadline, outstanding discovery issues and disputes, and communication to Judge Williams re same in CP case;	0.6	390.00
7/22/2021	Receive and review via email letter from OAL counsel re outstanding discovery subpoenae and service and response related issues in CP case; multiple email exchanges with co-counsel re same;	0.5	325.00
7/22/2021	Receive and review via ECF letter from co-counsel to Judge Williams re trial date, discovery deadline, and outstanding discovery disputes with State Defendants in CP case;	0.3	195.00
7/22/2021	Receive and review via ECF notice from clerk re Motion to Compel OAL in CP case;	0.1	65.00
7/22/2021	Email exchange with co-counsel re legal strategies on discovery in CP case and issues in other due process cases that violate 45 Day Rule and other regulations;	0.4	260.00
7/23/2021	Multiple email exchanges with all counsel re outstanding discovery and new NJDOE discovery requests and deposition notices in CP case; legal analysis re same;	0.6	390.00
7/23/2021	Receive and review via ECF Scheduling Order for Final Pre-Trial Conference in CP case; legal analysis re same;	0.3	195.00
7/23/2021	Email exchange with co-counsel re status of discovery disputes with State Defendants, pending depositions, and discovery deadline / trial date in CP case;	0.3	195.00
7/26/2021	Receive and review via ECF letter from co-counsel to Judge Williams re discovery deadline, withdrawing request for intervention with Judge Hillman on trial date, and seeking leave to file motion to compel in CP case;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/26/2021	Multiple email exchanges with co-counsel re ALJ Sanders involvement with changes to NJ regulations in preparation for deposition and corresponding documents in preparation for Worthington depo in CP case;	0.4	260.00
7/26/2021	Receive and review via email confidential joint plaintiffs' counsel meeting notes from 7/25/21 re discovery and pretrial issues in CP case;	0.5	325.00
7/26/2021	Email to co-counsel re Clerk error on docket as to date of final pretrial conference in CP case;	0.1	65.00
7/26/2021	Telephone call with co-counsel re preparation of Worthington depo in CP case;	0.3	195.00
7/26/2021	Prepare for and participate in status conference call with Judge Williams in CP case;	0.5	325.00
7/26/2021	Receive and review via ECF Text Order re status conference call with Judge Williams on CP case discovery;	0.1	65.00
7/26/2021	Receive and review via ECF letter from State Defendants' counsel to Judge Williams re discovery deadline, request for intervention with Judge Hillman on trial date, and related discovery issues in CP case;	0.4	260.00
7/26/2021	Lengthy email exchanges with co-counsel re legal analysis of State Defendants' letter to Judge Williams re discovery issues and deadline in CP case;	0.4	260.00
7/26/2021	Receive and review via email from co-counsel statutory references and other information in preparation for Worthington and Sanders depositions in CP case;	0.4	260.00
7/27/2021	Prepare for deposition of Worthington in CP case;	4.1	2,665.00
7/27/2021	Receive and review via email from co-counsel to NJDOE counsel re public documents being produced for ALJ Sanders depo; analysis re same in preparation for same and Worthington depo;	0.7	455.00
7/27/2021	Multiple email exchanges with co-counsel re preparation for ALJ Sanders depo and cross-over with Worthington depo; legal analysis re same;	1.2	780.00
7/27/2021	Shadow preparation for ALJ Sanders depo in CP case;	2.4	0.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/27/2021	Receive and review via ECF minute entry re 7/26 status conference with Judge Williams in CP case;	0.1	65.00
7/27/2021	Receive and review via ECF Amended Scheduling Order in CP case from Judge Williams with new pretrial deadlines and discovery issues;	0.4	260.00
7/28/2021	Prepare for deposition of Worthington in CP case;	3	1,950.00
7/28/2021	Numerous emails and discussion with co-counsel in preparation for depo of ALJ Bass in CP case;	0.5	325.00
7/28/2021	Receive and review emails from co-counsel re ALJ Sanders depo and attaching exhibits presented re testimony; legal analysis re same;	1.3	845.00
7/28/2021	Receive and review via email discussion with counsel re extension of time to respond to Plaintiffs' RFAs 02;	0.2	130.00
7/28/2021	Receive and review via email from State Defendants' counsel depo notices for DO obo MO, EM obo CM, EP obo EAP, SS obo HS, and YHS obo CHS; legal analysis re same;	0.4	260.00
7/28/2021	Receive and review email from co-counsel with documents / exhibits for ALJ Sanders deposition; legal analysis re same in preparation for same and Worthington depo;	1.9	1,235.00
7/29/2021	Prepare for deposition of Worthington in CP case;	6.7	4,355.00
7/29/2021	Receive and review via ECF letter from co-counsel to Judge Williams re 30b6 depositions of NJDOE and OAL and responding to State Defendants' counsel's letter to Court re same in CP case;	0.2	130.00
7/29/2021	Receive and review via ECF letter from State Defendants' counsel to Judge Williams re scope of discovery in light of 30b6 deposition of NJDOE in CP case; legal analysis re same;	0.4	260.00
7/29/2021	Email exchanges with counsel in CP case re draft consent order and amendments;	0.2	130.00
7/30/2021	Prepare for and take deposition of Worthington in CP case;	8.6	5,590.00
7/30/2021	Multiple email exchanges with counsel re draft consent order on discovery of sample files and proposed changes in CP case;	0.4	260.00
7/30/2021	Receive and review via email amended notice of deposition of MS o/b/o HS in CP case;	0.2	0.00

		Total	
--	--	--------------	--



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/10/2021	2168

Bill To

Due Date
8/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/31/2021	Multiple email exchanges with co-counsel re legal analysis of Worthington depo in CP case;	0.6	390.00
Total			\$41,340.00

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/2/2021	Receive and review via email from co-counsel revised depo schedule and legal strategy re same in CP case;	0.1	65.00
8/2/2021	Email exchange with co-counsel re Rota depo preparation in CP case;	0.2	130.00
8/2/2021	Receive and review via ECF letter from co-counsel to Judge Williams with proposed consent order on discovery of sample case files in CP case; legal analysis re same;	0.3	195.00
8/2/2021	Multiple email exchanges with co-counsel re changes in NJDOE leadership / politics and potential impact on CP case; legal analysis re same;	0.4	260.00
8/4/2021	Receive and review via email letter from co-counsel to State Defendants' counsel re deposition of DO and production of documents related thereto in CP case; legal analysis re same;	0.3	195.00
8/4/2021	Receive and review via ECF State Defendants' L.Civ.R. 7.1.1 statement in JA case;	0.1	65.00
8/4/2021	Receive and review via ECF State Defendants' L.Civ.R. 7.1.1 statement in CP case;	0.1	0.00
8/5/2021	Numerous email exchanges with counsel and documents for depositions in CP case;	0.9	585.00
8/5/2021	Receive and review via email from State Defendants' counsel attaching objections to 30b6 deposition notice re deposition in CP case;	0.9	585.00
8/5/2021	Receive and review via email letter and supplemental document production from State Defendants in CP case;	0.7	455.00
8/5/2021	Multiple email exchanges with co-counsel in preparation for Rota depo in CP case;	0.4	260.00
8/5/2021	Receive and review via email Plaintiffs' supplemental document production in CP case;	0.6	390.00
8/6/2021	Various emails and documents re depositions in CP case; legal analysis re same;	0.5	325.00
8/7/2021	Lengthy email discussion with co-counsel re settlement and strategy in CP case;	1.3	845.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/8/2021	Lengthy email discussion with co-counsel re settlement and political background to NJDOE decisions on 45 Day Rule and impact on CP case;	0.9	585.00
8/9/2021	Numerous email exchanges with counsel re documents for Osborn depo in CP case;	0.4	260.00
8/9/2021	Receive and review via email from co-counsel draft letter to potential witness Marciante and comments to amend re same in CP case; multiple email exchanges re same;	0.7	455.00
8/9/2021	Multiple email exchanges with co-counsel re additional fact witnesses in CP case and analysis re related issues and potential depositions;	1.1	715.00
8/10/2021	Receive and review via ECF OAL's opposition to Plaintiffs' motion to enforce subpoena in CP case; legal analysis re same;	1.4	910.00
8/10/2021	Receive and review via ECF Notice of Appearance of DAG Fichera for OAL in CP case;	0.1	0.00
8/10/2021	Email exchange with co-counsel re subpoena to Carolyn Marano for deposition;	0.1	65.00
8/10/2021	Group discussion with Plaintiffs' co-counsel in CP case re depositions of Hendricks and Marano, legal strategy, documents re same, subpoenas and service, and anticipated testimony; begin preparation for Hendricks depo as lead;	2.3	1,495.00
8/10/2021	Receive and review via email draft letter from co-counsel to Judge Williams in CP case re depositions and discovery status; legal analysis and comment re same;	0.5	325.00
8/10/2021	Receive and review via email Haile-Selassie's supplemental production in CP case;	0.3	0.00
8/10/2021	Receive and review via ECF Order granting release of sample case files in CP case; legal analysis re same;	0.2	130.00
8/10/2021	Receive and review via ECF Amended Notice of Depo of DO o/b/o MO in CP case;	0.2	0.00
8/10/2021	Email to co-counsel in CP case re decision in KKM case on 45 Day Rule and impact on class action with legal analysis and advice;	0.2	130.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/10/2021	Receive and review lengthy email from co-counsel with legal analysis from NJDOE 30b6 depo Ehling and false representations about cases decided by OAL and inaccuracies of data and impact on 45 Day Rule in CP case;	0.6	390.00
8/11/2021	Receive and review via ECF lengthy letter from co-counsel to Judge Williams re discovery dispute with State Defendants over scope and timeline of discovery in CP case;	0.3	195.00
8/11/2021	Receive and review via email from co-counsel to OAL counsel re Notice of Intent to take deposition of Hendricks and service issues;	0.3	195.00
8/11/2021	Receive and review via email from co-counsel to State Defendants counsel Notice of Intent to take depositions of Marano and Hendricks in CP case;	0.3	195.00
8/11/2021	Receive and review via email from co-counsel depo transcript of ALJ Sanders in CP case; legal analysis re same;	1.3	845.00
8/11/2021	Receive and review via email from State Defendants' counsel Notice of Depo of CP obo FP in CP case;	0.2	130.00
8/11/2021	Lengthy email discussion with co-counsel in CP case re change in procedures at OAL / NJDOE re 10 day hearing / settlement date and language on forms and impact on class action;	0.9	585.00
8/11/2021	Receive and review via email from co-counsel revised letter to Judge Williams re scope of discovery draft with amendments and suggestions;	0.2	130.00
8/12/2021	Email exchanges with counsel in CP case and counsel for OAL re deposition of Hendricks;	0.2	130.00
8/13/2021	Receive and review via email from co-counsel draft Reply brief in support of motion to enforce subpoena against OAL in CP case; legal analysis re draft; email to co-counsel with suggested changes and comments;	1	650.00
8/13/2021	Receive and review via email from co-counsel to NJDOE counsel letter requesting supplemental documents connected to depositions in CP case;	0.3	195.00
8/13/2021	Receive and review via ECF Plaintiffs' Reply Brief in support of motion to enforce subpoena against OAL in CP case;	0.2	0.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/13/2021	Receive and review via email from co-counsel to State Defendants' counsel Notice of Intent to Serve subpoena on OAL in CP case;	0.2	130.00
8/13/2021	Lengthy email discussion with co-counsel in CP case re CP individual case and legal strategy vis-a-vis the class action and legal advice on relief to seek under Judge Hillman;	0.6	390.00
8/16/2021	Receive and review via email letter from co-counsel to State Defendants' counsel amending answers to Interrogatories to identify witness of Dr. Marciante in CP case;	0.2	130.00
8/16/2021	Receive and review via email letter from co-counsel to State Defendants' counsel requesting documents resulting from Rota depo in CP case;	0.4	260.00
8/16/2021	Multiple email exchanges with co-counsel discussing Dr. John Marciante as witness and to amend discovery responses to include for trial in CP case;	0.5	325.00
8/16/2021	Receive and review via email depo transcript of Rota in CP case;	1.1	715.00
8/16/2021	Email exchanges with co-counsel re preparation and scheduling of Marano depo in CP case;	0.3	195.00
8/17/2021	Email discussion with co-counsel re additional discovery disputes with NJDOE and status of meet and confer and report to Judge Williams re same in CP case;	0.3	195.00
8/17/2021	Email discussion with co-counsel re preparation for Marano depo in CP case;	0.8	520.00
8/17/2021	Receive and review via email deposition transcript of Ehling; legal analysis re same in preparation for Marano and Hendricks depositions in CP case;	1.7	1,105.00
8/17/2021	Receive and review via email letter from OAL counsel to all counsel re designation of OAL depositions as For Attorneys' Eyes Only and Confidential in CP case; legal analysis re same and review Confidentiality Order;	0.5	325.00
8/17/2021	Email discussion with all counsel re OAL designation of OAL depositions as For Attorneys' Eyes Only and Confidential in CP case and objections to same;	0.4	260.00
8/17/2021	Preparation for depositions of Marano and Hendricks in CP case;	0.6	390.00
8/18/2021	Email exchanges with counsel re depo of Marano on CP case;	0.2	130.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/18/2021	Receive and review draft letter and multiple revisions from co-counsel to Judge Williams re discovery dispute in CP case;	0.4	260.00
8/18/2021	Lengthy email discussions with co-counsel re addressing discovery disputes over designation of transcripts by OAL as confidential and objections by NJDOE counsel to scope of discovery in CP case;	0.8	520.00
8/18/2021	Email discussions with co-counsel re class action settlement with NJDOE in similar case and legal analysis and advice re application to CP case;	0.4	260.00
8/19/2021	Receive and review via email letter from co-counsel to State Defendants' counsel re objections at depositions to post-2020 practices questions and meet and confer on discovery issue in CP case;	0.3	195.00
8/19/2021	Multiple email exchanges with co-counsel re NJDOE counsel objections during depositions and legal analysis re same;	0.5	325.00
8/19/2021	Email exchanges with counsel re deposition of Marano in CP case;	0.2	130.00
8/19/2021	Receive and review via email from State Defendants' counsel numerous subpoenas to various BOEs in NJ for documents in CP case; legal analysis of improper service and violation of the Scheduling Order; email to co-counsel re same;	1.4	910.00
8/20/2021	Email discussion with co-counsel re legal strategies and analysis of State Defendants' actions in light of 2/21/20 Judge Hillman's hearing and potential avenues of discovery / deposition testimony in CP case;	0.7	455.00
8/20/2021	Receive and review via ECF amended Trial Notice for 11/8/21 in CP case; analysis and reset schedules including discovery deadlines and pretrial memos;	0.4	260.00
8/20/2021	Receive and review via email deposition transcript of ALJ Bass in CP case; legal analysis re same in preparation for other depositions;	1.6	1,040.00
8/23/2021	Receive and review via email deposition transcript Worthington in CP case; legal analysis in preparation for Marano and Hendricks depositions;	0.4	260.00
8/24/2021	Receive and review via ECF letter from co-counsel to Judge Williams re discovery dispute and request for status conference in CP case;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/24/2021	Receive and review via email from co-counsel to OAL counsel Notice of Intent to serve subpoena and take deposition of Judge Moscovitz in CP case;	0.2	130.00
8/24/2021	Email exchanges re depo of Hendricks in CP case;	0.3	195.00
8/25/2021	Multiple email exchanges with OAL counsel and begin preparation for Hendricks depo in CP case;	0.9	585.00
8/25/2021	Multiple email exchanges among co-counsel and letters with OAL counsel re dispute on designation of depo transcripts in CP case; legal analysis of OPRA requests for transcripts and/or other public access and confidentiality issues / bases;	1	650.00
8/25/2021	Receive and review via email cover letter and supplemental production from State Defendants of updated and redacted case status reports 2010-20 in CP case;	0.5	325.00
8/25/2021	Prepare and serve subpoena for Hendricks depo in CP case; multiple email exchanges re same;	1.6	1,040.00
8/25/2021	Multiple email exchanges among co-counsel and with OAL counsel re dispute on designation of depo transcripts in CP case; legal analysis re same;	0.9	585.00
8/26/2021	Multiple email exchanges re meet and confer with OAL counsel re designation of transcripts as confidential and scope of CO in CP case;	0.3	195.00
8/26/2021	Multiple email exchanges with OAL counsel re deposition of Hendricks in CP case;	0.3	195.00
8/26/2021	Multiple email exchanges re appearance of Labin as mediator and now current DAG / counsel for State Defendants in CP case and legal analysis re potential conflict;	0.3	195.00
8/26/2021	Receive and review via email cover letter and supplemental production from State Defendants re sample files in CP case;	0.9	585.00
8/26/2021	Receive and review via email letter from co-counsel to State Defendants counsel amending Interrogatory responses and identifying additional fact witnesses for trial for Plaintiffs in CP case;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/27/2021	Receive and review via email State Defendants' partial response to RFAs in CP case; legal analysis re response to objections and incomplete responses;	1.7	1,105.00
8/27/2021	Receive and review via email State Defendants' supplemental production of documents in CP case; legal analysis and review re same;	1.5	975.00
8/27/2021	Receive and review via email from co-counsel in CP case decision by USDC DNJ remanding case to ALJ who wrote incoherent opinion re training issue;	1.1	715.00
8/27/2021	Multiple email exchanges and telephone call with co-counsel re meet and confer process with OAL in CP case;	1.3	845.00
8/27/2021	Preparation for Marano depo in CP case;	0.8	520.00
8/27/2021	Receive and review via ECF Order setting oral argument on pending discovery motions via Zoom in CP case;	0.1	65.00
8/27/2021	Receive and review via ECF State Defendants' letter to Judge Williams re discovery disputes and request for ext of time on oral argument in CP case;	0.4	260.00
8/27/2021	Receive and review via email letter from OAL counsel to co-counsel re dispute over designation of deposition transcripts as confidential under CO in CP case and related meet and confer issues;	0.3	195.00
8/27/2021	Telephone call with co-counsel Rue in preparation for meet and confer with OAL counsel in CP case on depo transcript issues;	0.2	130.00
8/28/2021	Prepare for Marano depo in CP case;	2.3	1,495.00
8/30/2021	Prepare for Marano depo in CP case;	2.8	1,820.00
8/30/2021	Prepare for and participate in Marano depo in CP case;	7.1	4,615.00
8/30/2021	Prepare and email summary of Marano depo to co-counsel in CP case;	0.4	260.00
8/30/2021	Telephone call with co-counsel re legal strategy, status of depositions, and analysis of NJDOE's legal position;	0.6	390.00
8/30/2021	Receive and review via ECF Order changing oral argument and inviting counsel to seek assistance from Judge Williams during depositions in CP case if necessary;	0.1	65.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2174

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/30/2021	Multiple email exchanges with co-counsel re strategies on trial witnesses and attendance via subpoenae and legal analysis of current issues before Judge Williams in CP case;	0.4	260.00
8/30/2021	Receive and review via ECF letter from co-counsel to Judge Williams re pending discovery disputes and oral argument re same in CP case;	0.3	195.00
8/30/2021	Prepare and file letter to Judge Williams re discovery disputes during Marano depo in CP case;	0.3	195.00
8/31/2021	Email exchanges with counsel re depo of Moskowitz, legal issues raised, and potential remedies in CP case;	0.7	455.00
8/31/2021	Receive and review via email letter from OAL counsel to co-counsel re objections and limitations to Moscovitz depo in CP case;	0.3	195.00
8/31/2021	Receive and review email from co-counsel to State Defendants' counsel re exhibits and cross-referenced Bates numbers from Marano depo in CP case;	0.2	130.00
8/31/2021	Multiple email exchanges with co-counsel and legal analysis re OAL monthly reports and OPRA requests documents comparison in preparation for various depositions in CP case;	0.6	390.00
8/31/2021	Receive and review via email depo transcript of Milligan in CP case;	0.5	0.00
8/31/2021	Receive and review via email cover letter from NJDOE counsel to co-counsel and attaching supplemental document production;	0.4	260.00
8/31/2021	Receive and review via email State Defendants' partial responses to 2nd RTAs in CP case with cover letter re more time to finish;	0.6	390.00
8/31/2021	Receive and review via email letter from OAL counsel re designation of transcripts as confidential in CP case and status re same;	0.4	260.00
8/31/2021	Email exchanges with co-counsel re supplemental information on Marano depo in CP case;	0.3	195.00
		Total	\$44,200.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/8/2021	2175

Bill To

Due Date
9/8/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount			
7/25/2020	Continue draft of discovery requests in CP case;	0.8	520.00			
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;"></td> <td style="width: 40%;"></td> <td style="width: 30%;">Total</td> <td style="background-color: #cccccc;">\$520.00</td> </tr> </table>					Total	\$520.00
		Total	\$520.00			



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
10/6/2021	2187

Bill To

Due Date
10/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/1/2021	Prepare for Hendricks depo in CP case;	5.2	3,380.00
9/1/2021	Receive and review via email letter from OAL counsel to ret re asserted objections and limitations to Hendricks depo in CP case;	0.4	260.00
9/2/2021	Prepare for and participate in status conference with Judge Williams re discovery issues on CP case;	2	1,300.00
9/2/2021	Telephone call with co-counsel re strategies for Hendricks depo and some additional documents re same in CP case;	0.5	325.00
9/2/2021	Prepare for Hendricks depo in CP case;	4.7	3,055.00
9/2/2021	Receive and review via email cover letter from NJDOE counsel to co-counsel with sample files in CP case; analysis re same;	1.4	910.00
9/2/2021	Email exchanges with co-counsel re decision by ALJ Betancourt that shows lack of training and expertise in writing decisions for use in CP case;	0.4	260.00
9/2/2021	Telephone call with co-counsel re withdrawal of issues from Marano depo, draft letter to Court re same, and discussion on strategy going forward during depositions in CP case;	0.5	325.00
9/2/2021	Receive and review letter via ECF from NJDOE counsel to Judge Williams re scheduling Order and objections to discovery with exhibits in CP case;	0.3	195.00
9/2/2021	Receive and review via ECF letter from NJDOE counsel to Judge Williams responding to letter re Marano depo in CP case;	0.2	130.00
9/2/2021	Receive and review via email letter from NJDOE counsel to co-counsel requesting documents discussed during depositions in CP case;	0.2	0.00
9/2/2021	Multiple email exchanges with counsel re discovery deadline, outstanding discovery requests, and depo of Judge Moskowitz in CP case;	0.6	390.00
9/2/2021	Email exchanges with co-counsel re OAL monthly reports and legal analysis of accuracy in light of number of due process cases for CP case;	0.5	325.00
9/2/2021	Receive and review via email State Defendants responses to 2nd RTAs complete with edits to prior partial response in CP case;	0.9	585.00
		Total	

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
10/6/2021	2187

Bill To

Due Date
10/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/3/2021	Prepare for and take deposition of Hendricks depo in CP case, including intervention by Judge Williams and legal arguments re same; follow up emails with co-counsel re same;	10.5	6,825.00
9/3/2021	Receive and review via email State Defendants' supplemental production of documents, privilege log, and objections to producing certain documents in CP case;	0.5	325.00
9/3/2021	Receive and review via email letter from co-counsel to OAL counsel re submission of documents for in camera review, supplemental certifications and privilege log in CP case;	0.2	130.00
9/3/2021	Receive and review via email letter from co-counsel to NJDOE counsel re submission of documents for in camera review, supplemental certifications and privilege log in CP case;	0.2	130.00
9/3/2021	Receive and review via ECF Order from Judge Williams confirming rulings and instructions from 9/2 status conference on deliberative process privilege and depositions in CP case;	0.3	195.00
9/3/2021	Receive and review via ECF minute entry re 9/2/21 status conference with Judge Williams on discovery in CP case;	0.1	0.00
9/3/2021	Multiple email exchanges with co-counsel re drafts of letters to NJDOE counsel and OAL counsel re 9/2 rulings by Judge Williams on deliberative process privilege and discovery and demands re same in CP case;	0.4	260.00
9/3/2021	Receive and review depo transcript of Elizabeth Blamble in CP case;	0.4	0.00
9/3/2021	Receive and review via email depo transcripts of Milligan and Gilliam in CP case;	0.6	0.00
9/4/2021	Prepare for and take deposition of Hendricks in CP case; emails to various counsel re same and exhibits;	9.1	5,915.00
9/4/2021	Email exchange with co-counsel re NJDOE documents re stakeholder meetings and relevance to 45 Day issue in CP case;	0.2	130.00
9/4/2021	Email to State Defendants' and OAL counsel re Hendricks depo in CP case;	0.1	65.00
9/7/2021	Receive and review via ECF notice of transcript of hearing and right to redact in CP case;	0.1	0.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
10/6/2021	2187

Bill To

Due Date
10/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/7/2021	Receive and review via email from co-counsel transcript of 9/3/21 hearing before Judge Williams in CP case;	0.7	455.00
9/7/2021	Receive and review email from co-counsel to NJDOE counsel re errors in production of documents re sample files in CP case;	0.1	0.00
9/7/2021	Receive and review via email more sample case files from State Defendants in CP case;	0.4	260.00
9/7/2021	Receive and review email from co-counsel re analysis of Hendricks depo in CP case and whether testimony of authority was accurate;	0.1	65.00
9/7/2021	Receive and review via email depo transcript of Marano in CP case; legal analysis re same;	0.9	585.00
9/8/2021	Email exchange with co-counsel re trial preparation assignments and legal analysis and strategy re same;	0.3	195.00
9/8/2021	Receive and review via email letter from OAL counsel to all counsel re designation of depo transcript of Hendricks as confidential in CP case;	0.3	195.00
9/8/2021	Begin trial preparation documents, strategy, trial outline, and proofs analysis in CP case;	2.6	1,690.00
9/9/2021	Email exchange with counsel re meet and confer on OAL depo transcript designations in CP case;	0.2	130.00
9/10/2021	Receive and review via ECF State Defendants' letter to Judge Williams re deliberative process privilege, revised privilege log and Certification of Ehling in support of same in CP case;	1.4	910.00
9/10/2021	Receive and review via email State Defendants' supplemental document production in CP case;	0.4	260.00
9/10/2021	Receive and review lengthy email from co-counsel to OAL counsel re meet and confer on confidentiality of transcripts issue, in particular new Hendricks depo transcript, in CP case;	0.3	195.00
9/10/2021	Receive and review via ECF Order from Judge Williams granting OAL ext time to respond to deliberative process and confidentiality issues in CP case;	0.1	65.00
9/10/2021	Receive and review via email depo transcript of Hendricks in CP case; legal analysis re same;	0.9	585.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
10/6/2021	2187

Bill To

Due Date
10/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/10/2021	Receive and review via ECF letter application of OAL counsel for extension of time to present modified privilege log and documents for in camera review on deliberative process privilege in CP case; legal analysis re same;	0.2	130.00
9/11/2021	Receive and review via email from co-counsel to OAL counsel re proposed draft joint letter to Court re dispute over confidentiality designation of depo transcripts in CP case;	0.4	260.00
9/14/2021	Receive and review via ECF letter from co-counsel to Judge Williams re dispute over OAL transcript designations in CP case; legal analysis re same;	0.4	260.00
9/14/2021	Receive and review via ECF letter from OAL counsel to Judge Williams re dispute over OAL transcript designations in CP case; legal analysis re same;	0.7	455.00
9/15/2021	Receive and review via ECF OAL's submissions re deliberative process privilege, Affidavit of ALJ Bass, revised privilege logs as per Court's Order in CP case; legal analysis re same;	1	650.00
9/16/2021	Receive and review via ECF State Defendants' request for extension of time to file dispositive motions in CP case; legal analysis re same and consultation with co-counsel re same;	0.6	390.00
9/16/2021	Receive and review via email Plaintiffs' proposed draft brief re deliberative process and co-counsel input and suggestions in CP case; legal analysis; email to co-counsel with input;	0.8	520.00
9/16/2021	Receive and review via ECF letter from co-counsel to Judge Williams opposing State Defendants' application for extension of deadline to file dispositive motions in CP case; legal analysis re same;	0.3	195.00
9/16/2021	Receive and review via ECF docket entry re appeal of discovery order in CP case;	0.1	0.00
9/16/2021	Receive and review via ECF and email from co-counsel Plaintiffs' appeal of Judge Williams' Order on deliberative process privilege in CP case; legal analysis re same;	1.3	845.00
9/16/2021	Multiple email exchanges with co-counsel re drafts opposition letter to Judge Williams re modifying scheduling order in CP case; legal analysis and review drafts with comments;	0.7	455.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
10/6/2021	2187

Bill To

Due Date
10/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/16/2021	Receive and review via email cover letter from OAL counsel and supplemental production of documents pursuant to subpoena and not subject to deliberative process privilege in CP case; legal analysis re same;	1	650.00
9/17/2021	Receive and review via ECF Order changing trial date and other pretrial dates by Judge Hillman in light of discovery disputes and appeals in CP case;	0.2	130.00
9/17/2021	Receive and review via ECF Order by Judge Williams modifying Scheduling Order and granting ext time to State Defendants to file dispositive motions in CP case;	0.1	65.00
9/20/2021	Receive and review via ECF letter from co-counsel to Judge Williams to adjust Scheduling Order re pretrial in accordance with new trial date ordered by Judge Hillman in CP case;	0.1	65.00
9/20/2021	Receive and review via ECF joint letter to Judge Hillman requesting brief adjournment of trial date due to conflicts in CP case;	0.1	65.00
9/20/2021	Receive and review via ECF notice of withdrawal of DAG Jones from JA case and request for removal from notice;	0.1	65.00
9/21/2021	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman re trial dates in CP case;	0.1	0.00
9/23/2021	Review draft letter to State Defendants' counsel re outstanding discovery in CP case; legal analysis; receive and review final version sent to counsel via email;	0.3	195.00
9/24/2021	Receive and review via ECF Amended Scheduling Order from Judge Williams re Final Pre-Trial Order in CP case;	0.3	195.00
9/30/2021	Receive and review via ECF text Order by Judge Hillman granting ext time for briefing on appeal of discovery order from Judge Williams in CP case;	0.1	65.00
9/30/2021	Receive and review via ECF letter application by OAL to Judge Hillman re ext time to respond to appeal of discovery order from Judge Williams in CP case;	0.2	130.00
9/30/2021	Receive and review via ECF letter application by State Defendants to Judge Hillman re ext time to respond to appeal of discovery order from Judge Williams in CP case;	0.2	130.00
		Total	\$36,920.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
11/10/2021	2194

Bill To

Due Date
11/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
10/1/2021	Receive and review via ECF Text Order re status conference on deliberative process issue with Judge Williams in CP case;	0.1	65.00
10/5/2021	Receive and review via ECF letter from DAG Weber / State Defendants' counsel to Judge Hillman requesting 45 day adjournment of trial due to family health crisis of DAG Soranno and consent of plaintiffs in CP case;	0.3	195.00
10/5/2021	Receive and review via ECF Order from Judge Hillman adjourning trial one week as per prior requests in CP case;	0.1	65.00
10/5/2021	Email exchange with co-counsel re potential adjournment of trial due to DAG Soranno's family health crisis and legal options re same in CP case;	0.3	195.00
10/7/2021	Receive and review via ECF Order setting new trial dates and other pre-trial dates by Judge Hillman in CP case;	0.2	130.00
10/7/2021	Receive and review via ECF letter from co-counsel to Judge Williams re clarification of Scheduling Order in CP case and legal analysis re same;	0.2	130.00
10/7/2021	Receive and review via ECF Order and Amended Order re 10/12/21 status conference with Judge Williams in CP case;	0.2	130.00
10/8/2021	Receive and review via ECF Appearance by DAG Labin for State Defendants in CP case;	0.1	65.00
10/12/2021	Prepare for and participate in Status Conference via Zoom with Magistrate Judge Williams re discovery disputes in CP case;	2.3	1,495.00
10/12/2021	Multiple email exchanges with co-counsel re errors by Judge Williams in discovery disputes in CP case and potential appeal re same;	0.5	325.00
10/13/2021	Multiple email exchanges with co-counsel re cross-over and scheduling conflict between preliminary injunction hearing in CP individual case and pretrial dates in CP class action case and resolution re same;	0.8	520.00
10/13/2021	Receive and review via ECF Amended Scheduling Order from Judge Williams in CP case; docket dates for final pretrial order and conference;	0.2	130.00
10/13/2021	Receive and review via email detailed analysis of related case and impact on legal strategy for trial in CP case;	0.4	260.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
11/10/2021	2194

Bill To

Due Date
11/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
10/14/2021	Receive and review via ECF Order re motion to compel discovery related to deliberative process privilege and confidential designations of transcripts in CP case;	0.5	325.00
10/14/2021	Receive and review via ECF minute entry re 10/12/21 hearing in CP case;	0.1	65.00
10/14/2021	Multiple email exchanges with co-counsel re legal arguments and facts from one bad case for trial in CP case;	0.4	260.00
10/19/2021	Receive and review via email State Defendants' supplemental production of documents pursuant to Judge Williams' Order in CP case; legal analysis re same;	1.2	780.00
10/19/2021	Receive and review via email letter from State Defendants' counsel re discovery dispute, outstanding discovery, and production of supplemental case file histories in CP case; legal analysis re same;	0.9	585.00
10/20/2021	Receive and review via email letter from co-counsel to State Defendants' counsel re discovery disputes and outstanding discovery requests in CP case; analysis re same;	0.2	130.00
10/22/2021	Receive and review via ECF letter from OAL counsel to Judge Williams re designation of deposition transcripts with specific identifications of alleged confidential information pursuant to Court Order; legal analysis re same;	0.4	260.00
10/23/2021	Review OAL designations of transcripts as confidential in CP case and legal analysis with co-counsel to challenge designations;	0.8	520.00
10/24/2021	Multiple email exchanges with co-counsel re OAL counsel DAG Fichera submission re transcripts confidentiality and legal discussion re seeking sanctions against conduct;	0.6	390.00
10/25/2021	Receive and review via ECF Text Order amending schedule of pre-trial dates in CP case;	0.1	65.00
10/27/2021	Multiple email exchanges with co-counsel re recent events and impact on CP case scheduling and strategy;	0.4	260.00
10/28/2021	Multiple email exchanges with co-counsel re impact of 15 day rule on CP case and elevation of Judge Williams to District Judge;	0.4	260.00
10/29/2021	Receive and review via email from co-counsel letter and notices to State Defendants re trial testimonies in lieu of subpoenae in CP case;	0.4	260.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
11/10/2021	2194

Bill To

Due Date
11/10/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
11/8/2021	Receive and review via ECF notice of change of Magistrate Judge; advise clients accordingly;	0.2	130.00
Total			\$7,995.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
12/6/2021	2199

Bill To

Due Date
12/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
11/2/2021	Receive and review via email supplemental notices in lieu of subpoenae to State Defendants in CP case; legal analysis re same and preparation for trial;	0.3	195.00
11/3/2021	Legal analysis with co-counsel re OAL designations of transcripts as confidential and Plaintiffs' proposed challenges; receive and review via ECF letter to Judge Williams re same in CP case;	0.4	260.00
11/3/2021	Receive and review via email trial subpoenae for Marano and Worthington in CP case and cover letter re service of same; legal analysis and trial preparation;	0.3	195.00
11/8/2021	Discussion and analysis re trial subpoenae to OAL witnesses; receive and review via email trial subpoenae for Hendricks, Bass, Sanders, and Moscovitz and cover letter re same in CP case;	0.5	325.00
11/8/2021	Receive and review via ECF reassignment of Magistrate Judge Skahill to CP case;	0.1	0.00
11/8/2021	Receive and review via ECF Notice of Appearance of DAG Klika for State Defendants in CP case;	0.1	65.00
11/9/2021	Legal discussion and strategy re contact with newly assigned Judge Skahill re status of discovery and disputes in CP case; receive and review via ECF letter to Judge Skahill re same;	0.3	195.00
11/12/2021	Legal strategy and tactics discussion with counsel re status of witness Rota and ensuring appearance for testimony at trial;	0.3	195.00
11/18/2021	Receive and review correspondence from co-counsel re final draft of MSJ in CP case; review and legal analysis of draft with input re same;	1.6	1,040.00
11/18/2021	Receive and review correspondence from co-counsel re near final draft of motion for class certification in CP case; legal analysis and input re same;	0.9	585.00
11/22/2021	Prepare firm summary for Rule 23b motion class certification in CP case;	0.5	325.00
11/22/2021	Receive and review via ECF Plaintiffs' Motion for Partial Summary Judgment and all certifications and exhibits thereto and legal analysis re CP case in preparation for trial and similar motions in JA case;	1.5	975.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
12/6/2021	2199

Bill To

Due Date
12/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
11/22/2021	Receive and review via ECF Plaintiffs' Second Motion to Certify Class Rule 23(b)(2) in CP case and legal analysis re same in preparation for trial and for similar motion in JA case;	0.9	585.00
11/22/2021	Receive and review via ECF Plaintiffs' Second Motion to Certify Class Rule 23(b)(3) in CP case and legal analysis re same in preparation for trial and for similar motion in JA case;	2.1	1,365.00
11/22/2021	Receive and review via ECF Text Order from Judge Skahill re conference call on status of confidentiality of transcripts discovery dispute in CP case;	0.1	65.00
11/23/2021	Analysis and strategy development in responding to State Defendants' MSJ and brief in CP case; prepare Motion for Rule 11 Sanctions NOM, brief, proposed Order, and cover letter to DAGs re same; distribute same for legal analysis and assessment;	1.3	845.00
11/23/2021	Receive and review via ECF letter from co-counsel to Judge Skahill re discovery dispute over OAL designations of transcripts as confidential in CP case; legal analysis re same;	0.2	130.00
11/23/2021	Receive and review via email letter from co-counsel to State Defendants' counsel re documents received by defendants pursuant to subpoenae to school and not produced to plaintiffs in CP case; analysis re same;	0.1	65.00
11/23/2021	Receive and review via ECF notice from clerk re motion dates and deadlines for various pending motions filed in CP case;	0.1	65.00
11/23/2021	Receive and review via email from State Defendants' counsel exhibits filed under seal and Certification of Counsel re exhibits for defendants' MSJ in CP case; legal analysis re same;	1.9	1,235.00
11/23/2021	Receive and review via ECF State Defendants' MSJ and supporting papers in CP case; legal analysis re same;	2.6	1,690.00
11/23/2021	Receive and review via ECF State Defendants' motion to file MSJ brief in excess of page limit and supporting documents in CP case; legal analysis re same;	0.4	260.00
11/24/2021	Receive and review correspondence from co-counsel re changes to Motion for Rule 11 Sanctions brief in CP case; legal analysis re same and amend and supplement brief;	0.4	260.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
12/6/2021	2199

Bill To

Due Date
12/6/2021

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
11/24/2021	Receive and review via ECF letter from co-counsel to Judge Skahill re rescheduling discovery status conference call in CP case;	0.1	0.00
11/29/2021	Receive and review via ECF correspondence from State Defendants' counsel to Judge Hillman requesting adjournment of motion filing dates in CP case; legal analysis re same and correspondence to counsel re legal strategy re same;	0.4	260.00
11/29/2021	Receive and review via ECF Text Order from Judge Skahill re rescheduling discovery status conf in CP case;	0.1	65.00
11/29/2021	Correspondence exchange with co-counsel re legal strategy and advice on Rule 11 motion brief in CP case;	0.2	130.00
11/29/2021	Receive and review correspondence from co-counsel to State Defendants' counsel re Rule 11 motion with instructions to correct i.e. safe harbor letter in CP case;	0.3	195.00
11/29/2021	Receive and review via ECF filing letter Plaintiffs Rule 7.1 adjournment of MSJ in CP case;	0.1	65.00
11/29/2021	Receive and review via ECF Order text re adjournment of motions for class cert in CP case;	0.1	65.00
11/29/2021	Receive and review via email letter from co-counsel to Judge Hillman re courtesy copies of motions filed in CP case;	0.2	0.00
11/29/2021	Correspondence exchange re legal strategy responding to State Defendants request for further ext time / adjournment of motions in CP case;	0.1	65.00
11/30/2021	Correspondence exchange with co-counsel re legal strategy and advice on Rule 11 motion brief in CP case; amend and supplement brief re same;	0.6	390.00
11/30/2021	Receive and review via ECF letter application by NJDOE for ext time to respond to discovery appeal in CP case;	0.2	130.00
11/30/2021	Receive and review via ECF notice of reset deadlines for MSJs in CP case;	0.1	65.00
11/30/2021	Amend and supplement Rule 11 motion papers and brief; strategy conference and development with co-counsel re same;	0.7	455.00
		Total	\$12,805.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2213

Bill To

Due Date
1/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/1/2021	Receive and review via ECF Text Order from Judge Hillman granting ext time to State Defendants to file opposition to discovery appeal in CP case;	0.1	65.00
12/1/2021	Receive and review via ECF Text Order from Judge Hillman granting ext time to OAL to file opposition to discovery appeal in CP case;	0.1	65.00
12/1/2021	Receive and review via ECF OAL letter application for ext time to respond to discovery appeal in CP case;	0.2	130.00
12/2/2021	Receive and review via ECF letter application by NJDOE counsel for ext time R 7.1 to respond to Plaintiffs' MSJ in CP case;	0.2	130.00
12/2/2021	Correspondence to NJDOE counsel re amended Rule 11 motion and brief and adjusted timeline re same in CP case;	0.3	195.00
12/3/2021	Receive and review via ECF notice to reset deadlines for MSJs in CP case;	0.1	65.00
12/3/2021	Receive and review via ECF Text Order changing status conference with Judge Skahill in CP case;	0.1	65.00
12/6/2021	Receive and review via ECF letter application re ext time to file joint omnibus motion to seal in CP case;	0.1	65.00
12/6/2021	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman re consent to adjourn motion date in CP case;	0.1	0.00
12/8/2021	Telephone call and email from co-counsel re certification re 10 Day Peremptory Hearing Date Rule and mandatory settlement conferences as initial hearing in special education due process cases for use in CP case;	0.4	260.00
12/9/2021	Legal discussion and analysis with co-counsel in CP case re ALJ Bass position on conflicts and legal strategy re same;	0.5	325.00
12/9/2021	Receive and review via ECF Text Order from Judge Hillman re adjournment of motion date;	0.1	65.00
12/9/2021	Receive and review via ECF OAL opposition to appeal of discovery ruling on deliberative process and supporting certs and exhibits in CP case; legal analysis re same;	1.8	1,170.00
12/9/2021	Receive and review via ECF State Defendants' opposition to appeal of discovery ruling on deliberative process and supporting certs and exhibits in CP case; legal analysis re same;	1.9	1,235.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2213

Bill To

Due Date
1/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/10/2021	Prepare case list of related cases to JA and CP class actions for legal analysis and strategy;	0.3	195.00
12/10/2021	Receive and review via email correspondence exchange re missing exhibits / documents in 11/23/2021 filing in CP case;	0.1	65.00
12/10/2021	Receive and review email from co-counsel to State Defendants' counsel re failure to provide discovery of sample case files as per Judge Williams' Order in CP case;	0.1	65.00
12/10/2021	Receive and review email from co-counsel to State Defendants' counsel re failure to provide discovery received via subpoena by NJDOE to school districts in CP case;	0.1	65.00
12/10/2021	Receive and review via ECF letter from co-counsel to Judge Hillman confirming filing deadline for reply brief on appeal of discovery issue in CP case;	0.1	65.00
12/11/2021	Receive and review via email NJDOE / State Defendants' supplemental production of outstanding discovery and cover letter with additional information re same in CP case; legal analysis re same;	0.9	585.00
12/12/2021	Receive and review via ECF letter from State Defendants' counsel to Judge Skahill requesting additional time to provide PTO in CP case; legal analysis re same;	0.2	130.00
12/13/2021	Prepare Certification on 10 Day Peremptory Hearing Date Rule vs. Settlement Conference practice at OAL in CP case; review documents for exhibits to support Cert; email draft to co-counsel for review and comment;	3.3	2,145.00
12/13/2021	Receive and review via ECF correspondence from co-counsel to Judge Skahill re status of PTO and objections to delay of NJDOE in CP case; legal analysis re same;	0.3	195.00
12/13/2021	Receive and review via ECF Text Order from Judge Hillman re briefing on appeal of Judge Williams' discovery order in CP case;	0.1	65.00
12/13/2021	Receive and review via ECF Text Order from Judge Skahill approving ext time for PTO in CP case;	0.1	65.00
12/14/2021	Prepare for and participate (partial) in status conference with Judge Skahill in CP case;	0.8	520.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2213

Bill To

Due Date
1/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/14/2021	Receive and review via ECF Minute Entry on docket re 12/14 status conference held with Judge Skahill in CP case;	0.1	0.00
12/14/2021	Receive and review via email State Defendants' draft portions of PTO and legal analysis in CP case;	1	650.00
12/14/2021	Receive and review via ECF Order by Judge Skahill re ext time to file Omnibus Motion to Seal in CP case;	0.1	65.00
12/14/2021	Extensive legal analysis and strategy discussion re Rule 11 motion in CP case;	0.4	260.00
12/16/2021	Receive and review via ECF letter from state defendants' counsel to Judge Skahill re pre-trial hearing and another request for delay in CP case;	0.2	130.00
12/16/2021	Receive and review via ECF letter to Judge Skahill from co-counsel re PTO and Pre-Trial Conference and State Defendants' frivolous objections; legal analysis re same;	0.3	195.00
12/16/2021	Receive and review via ECF Order from Judge Skahill striking confidentiality designations by OAL of depo transcripts in CP case; legal analysis for other related cases;	0.2	130.00
12/17/2021	Receive and review correspondence from co-counsel re legal discussion and strategy re Rule 11 motion and related issues before trial;	0.2	130.00
12/18/2021	Receive and review via ECF Joint Pretrial Order and attachments in CP case; legal analysis re same;	1.5	975.00
12/19/2021	Legal analysis re docket numbering system of OAL due process cases as evidence of acknowledged delay and discussion re strategy to get into evidence in CP case;	0.4	260.00
12/19/2021	Email to co-counsel re legal discussion, advice, and strategy re Rule 11 motion and related issues before trial in CP case;	0.2	130.00
12/20/2021	Legal analysis and strategy discussion re Rule 11 motion in CP case;	0.4	260.00
12/20/2021	Receive and review via email NJDOE's Settlement Points in CP case; legal analysis re same;	0.8	520.00
12/20/2021	Receive and review via ECF Plaintiffs' Reply in support of appeal from Discovery Order in CP case; legal analysis and strategy discussion re same;	0.8	520.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2213

Bill To

Due Date
1/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/20/2021	Review and legal analysis of filed PTO in CP case; strategy discussion re same;	1.1	715.00
12/20/2021	Email exchange with co-counsel re additional evidence on delays based on docket numbering system in OAL in CP case and legal analysis re same;	0.2	130.00
12/21/2021	Prepare for and participate in Pre Trial Conference with Judge Skahill to discuss PTO and issues remaining in CP case;	1.5	975.00
12/21/2021	Prepare for and participate in post-Pre-Trial Conference strategy discussion with co-counsel in CP case;	0.6	390.00
12/21/2021	Prepare for and participate in follow up conf call with Judge Skahill re conflict issues and pretrial in CP case;	0.3	195.00
12/21/2021	Multiple email exchanges with co-counsel re Judge Skahill potential conflict issues and pretrial and legal advice and strategy discussions re same in CP case;	0.4	260.00
12/21/2021	Multiple email exchanges with counsel re Judge Skahill potential conflict issues and pretrial and legal advice and strategy discussions re same as impact on JA case;	0.4	260.00
12/21/2021	Receive and review via ECF Text Order from Judge Skahill re PTO and final discovery related matters and deadlines / schedule for remaining events pretrial in CP case; legal analysis re same;	0.2	130.00
12/21/2021	Receive and review via ECF Text Order re supplemental conference call with Judge Skahill in CP case; legal analysis re same in preparation for same;	0.1	65.00
12/21/2021	Email discussion and strategy with co-counsel re supplemental conference call with Judge Skahill in CP case; legal analysis and preparation for same;	0.2	130.00
12/21/2021	Receive and review via ECF correspondence from State Defendants' counsel to Judge Skahill re PTC and scope of same; legal analysis re same;	0.2	130.00
12/22/2021	Receive and review via ECF Minute Entry re 12/21 status conf held in CP case;	0.1	0.00
12/22/2021	Receive and review correspondence from State Defendants' counsel to Judge Hillman requesting adjournment of 12/23 deadline to file motions in limine in CP case;	0.2	130.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2213

Bill To

Due Date
1/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/22/2021	Receive and review via ECF Minute Entry re Pre Trial Conference held before Judge Skahill in CP case;	0.1	0.00
12/22/2021	Receive and review via ECF correspondence from co-counsel to Judge Hillman objecting to NJDOE's request for adjournment of deadlines in CP case; legal analysis re same;	0.3	195.00
12/22/2021	Receive and review draft correspondence to Judge Hillman objecting to NJDOE request for adjournment; legal analysis re same and strategy discussion with co-counsel re same in CP case;	0.8	520.00
12/22/2021	Receive and review via ECF lengthy correspondence from State Defendants' counsel to Judge Hillman requesting adjournment and arguments in support of same in CP case; legal analysis re same and strategy for opposition discussion with co-counsel;	0.4	260.00
12/22/2021	Correspondence exchange and legal research on final briefs submitted in DP cases for purposes of arguing delays and adjournments are the result of ALJs, not the parties, in CP case;	0.8	520.00
12/22/2021	Prepare Rule 11 Sanctions certification for JRA in CP case as per strategy discussion on same;	0.4	260.00
12/22/2021	Receive and review via ECF Order signed by Judge Skahill amending caption in CP case; amend caption for future pleadings;	0.2	130.00
12/22/2021	Multiple correspondence exchanged re legal analysis and strategy planning for remote trial via video technology and case presentation, including evidence in CP case;	0.4	260.00
12/22/2021	Receive and review multiple correspondence via email re Defendants do not assert conflict of interest against Judge Skahill and no objection to remaining on case; legal analysis and strategy discussion among co-counsel re same;	0.3	195.00
12/23/2021	Multiple communications wit co-counsel re strategy discussion and legal research re filing Rule 11 Sanctions motion and timing of same after safe harbor in CP case;	1.1	715.00
12/23/2021	Receive and review via email correspondence from co-counsel to DAG Soranno offering resolution of Rule 11 sanctions issue in CP case; legal analysis and comment re same;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2213

Bill To

Due Date
1/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/23/2021	Receive and review via ECF Text Order from Judge Hillman maintaining all deadlines in CP case; legal analysis and strategy discussion with co-counsel re same;	0.4	260.00
12/23/2021	Email to all plaintiffs' counsel in both class actions re Order from ALJ Caliguire on Five Day Exchange Rule objection / motion in limine denying motion and permitting supplemental submissions for hearing in related OAL case with legal analysis;	0.3	195.00
12/23/2021	Receive and review via email correspondence from Judge Skahill to all counsel re staying on case as all parties consented and waived any potential conflict due to class structure in CP case;	0.3	195.00
12/23/2021	Multiple correspondence exchanged with legal analysis and strategy re Rule 11 motion against DAGs and defendants in CP case;	0.9	585.00
12/23/2021	Receive and review via ECF Plaintiffs' Motion in Limine and supporting papers and letter to Judge Hillman with courtesy copies in CP case; legal analysis re same;	1.6	1,040.00
12/24/2021	Receive and review via ECF State Defendants Motion in Limine and Amended Motion in Limine in CP case; legal analysis re same;	1.3	845.00
12/24/2021	Further strategy discussion re Rule 11 motion in CP case;	0.2	130.00
12/26/2021	Receive and review draft letter from co-counsel to Judge Hillman re virtual trial and issues to discuss in CP case; legal analysis re same;	0.6	390.00
12/27/2021	Receive and review via email correspondence exchange re briefing schedule adjournment on MSJs in CP case;	0.1	65.00
12/27/2021	Receive and review via ECF Text Order from Judge Hillman re briefing schedule and trial date in CP case; legal analysis re same;	0.1	65.00
12/27/2021	Receive and review via ECF motion schedule for motions in limine in CP case;	0.1	0.00
12/28/2021	Receive and review via ECF letter from co-counsel to Judge Skahill re consent to adjourn due date for PTO in CP case;	0.1	65.00
12/28/2021	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman re trial date is federal holiday and request to adjourn in CP case;	0.1	65.00
12/28/2021	Receive and review via email correspondence from State Defendants' counsel to Court re trial date conflicting with federal holiday in CP case;	0.1	65.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
1/2/2022	2213

Bill To

Due Date
1/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount		
12/29/2021	Receive and review via ECF Text Order from Judge Hillman re trial adjournment in CP case;	0.1	65.00		
12/29/2021	Receive and review via ECF Text Order from Judge Skahill re amending PTO in light of new trial date and status conference re same in CP case; legal analysis re same;	0.2	130.00		
12/30/2021	Receive and review via ECF Text Order from Judge Hillman re pre-trial dates adjusted in CP case; legal analysis re same;	0.2	130.00		
12/30/2021	Receive and review via ECF letter from co-counsel Rue to Judge Hillman re adjournments and virtual trial issues in CP case; legal analysis re same;	0.3	195.00		
<table border="1"> <tr> <td>Total</td> <td>\$23,465.00</td> </tr> </table>			Total	\$23,465.00	
Total	\$23,465.00				

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
2/6/2022	2233

Bill To

Due Date
2/6/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/1/2022	Correspondence and strategy discussion with co counsel re Judge Skahill's decision on discovery of school district history of taking advantage of broken NJ sped dispute resolution system and impact on both class actions and individual cases with legal analysis and advice;	0.3	195.00
1/1/2022	Correspondence exchange with co-counsel re discovery issue of school districts' history of due process cases and legal advice and strategy re same in CP case;	0.2	130.00
1/2/2022	Correspondence to co-counsel re legal analysis and strategy on remote / virtual trial vs. in-person trial in preparation for conference call with Judge Hillman in CP case;	0.2	130.00
1/2/2022	Receive and review correspondence from co-counsel re legal strategy and analysis on virtual trial and other issues in CP case;	0.2	130.00
1/3/2022	Correspondence exchange with co-counsel re RCT taking lead on cross of school district counsel and direct of Hendricks and Worthington in CP case;	0.2	130.00
1/4/2022	Email correspondence to Amici in CP case re discovery decision by Judge Skahill in individual case on issue of school districts' history of due process cases;	0.2	130.00
1/4/2022	Receive and review via ECF State Defendants' opposition to Plaintiffs' motion in limine in CP case; legal analysis re same;	1.5	975.00
1/4/2022	Receive and review via ECF Plaintiffs' opposition to State Defendants' motion in limine in CP case; legal analysis re same;	0.8	520.00
1/4/2022	Receive and review via ECF Plaintiffs' motion for sanctions against State Defendants and counsel re false statements about compliance with IDEA and 45 Day Rule in CP case; legal analysis re same;	0.3	195.00
1/5/2022	Correspondence exchange with DAG Herlihy re filed documents under seal;	0.3	195.00
1/7/2022	Multiple correspondence and strategy conference re trial testimony and scope of witnesses in CP case;	0.9	585.00
1/7/2022	Receive and review via ECF notice of filed transcript of proceedings before judge Skahill on 12/21/21 in CP case;	0.1	0.00
1/8/2022	Receive and review email from co-counsel Giles re direct testimony at trial and strategy in CP case;	0.1	65.00
		Total	

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
2/6/2022	2233

Bill To

Due Date
2/6/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/10/2022	Strategy and legal analysis discussion with co-counsel re changes to transmittal of DP cases from NJDOE to OAL and new language re same and impact on CP case;	0.7	455.00
1/11/2022	Correspondence exchanged with co-counsel re using MW case as example and evidence of the falsity of NJDOE's position regarding delays in the system due to parent requested adjournments; legal analysis re same;	0.3	195.00
1/11/2022	Receive and review via ECF Plaintiffs' Reply in support of Motion in Limine and supporting documents; legal analysis re same;	0.8	520.00
1/12/2022	Receive and review via ECF and email from State Defendants' counsel Reply letter brief, exhibits, and Cert of Counsel re their Motion in Limine in CP case; legal analysis re same;	1.2	780.00
1/12/2022	Strategy discussion, legal analysis, and planning for trial and pretrial tasks for steering committee on CP case; begin work on various tasks including potential fee petition, motions, and witness prep;	1.4	910.00
1/13/2022	Strategy discussion post-conference with Judge Hillman on settlement, pending motions, adjournments, and counsel for State Defendants in CP case;	0.4	260.00
1/13/2022	Prepare for and participate in status conference (via Zoom) with Judge Hillman re trial in CP case;	0.8	520.00
1/13/2022	Witness preparation and strategy zoom calls in CP case;	1.6	1,040.00
1/13/2022	Receive and review via ECF Text Order re briefing schedule on State Defendants' MSJ in CP case; legal analysis re same;	0.1	65.00
1/13/2022	Multiple correspondence and strategy discussion re 'good cause' requirement in adjournments in NJ special ed law as impacting 45 Day Rule and class actions;	0.4	260.00
1/13/2022	Multiple correspondence exchanges and strategy discussion in preparation of status call with Judge Hillman in CP case;	0.3	195.00
1/14/2022	Witness preparation and strategy zoom call in CP case;	1	650.00
1/15/2022	Strategy discussion re 2/14 conference and 2/22 trial date and legal analysis re same and Judge Hillman in CP case;	0.7	455.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/6/2022	2233

Bill To

Due Date
2/6/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/15/2022	Receive and review via email letter from co-counsel to State Defendants' counsel re settlement discussions in CP case; legal analysis re same;	0.3	195.00
1/15/2022	Receive and review via ECF cover letter re courtesy copies and cert service re State Defendants' reply in support of motion in limine in CP case;	0.2	0.00
1/17/2022	Strategy discussion via email with co-counsel re impact of various regulations on DP cases and relevance to both class action cases;	0.2	130.00
1/17/2022	Legal strategy and advice conference with co-counsel re involvement of ELC and potential settlement discussions;	0.4	260.00
1/18/2022	Receive and review via ECF minute entry re 1/13/22 status conference with Judge Hillman in CP case;	0.1	0.00
1/19/2022	Receive and review via ECF State Defendants' Opposition (74 pages) to Plaintiffs' Second Motion for Class Certification in CP case; legal analysis re same;	2.2	1,430.00
1/19/2022	Receive and review via ECF State Defendants' Motion for Leave to File Overlength brief re Plaintiffs' Second Motion for Class Certification and supporting papers; legal analysis re same;	0.2	130.00
1/19/2022	Receive and review via ECF parties' joint letter to Judge Skahill re redactions and omnibus motion to seal in CP case; legal analysis re same;	0.1	65.00
1/21/2022	Receive and review final trial preparation outline and strategy; legal analysis and tasks assigned to RCT;	1.1	715.00
1/24/2022	Multiple correspondence exchanges with clients re preparation for trial in CP case and legal advice re same;	0.4	260.00
1/24/2022	Strategy and trial planning conference and discussion re scope of co-counsel;	1	650.00
1/24/2022	Receive and review revised draft of Certification re denial of hearing request by OAL in CP case for purposes of summary judgment motion;	0.4	260.00
1/24/2022	Begin draft of Reply brief in support of Motion for Rule 11 Sanctions in CP case; review documents re same;	0.6	390.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/6/2022	2233

Bill To

Due Date
2/6/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/24/2022	Receive and review via ECF Plaintiffs' opposition to State Defendants MSJ and numerous supporting papers in CP case; legal analysis re same;	1.6	1,040.00
1/24/2022	Receive and review via ECF Order by Judge Skahill granting additional time to file Omnibus Joint Motion to Seal in CP case;	0.1	65.00
1/25/2022	Strategy discussion and legal analysis re State Defendants' response to Motion for Sanctions in CP case in preparation for Reply brief;	0.4	260.00
1/25/2022	Receive and review via ECF State Defendants' opposition to Motion for Sanctions in CP case; legal analysis re same;	0.8	520.00
1/25/2022	Receive and review via ECF Plaintiffs' Reply in Support of Second Motion to Certify Class 23b2 in CP case; legal analysis re same;	0.7	455.00
1/25/2022	Receive and review via ECF Plaintiffs' Reply in Support of Second Motion to Certify Class 23b3 in CP case; legal analysis re same;	0.7	455.00
1/25/2022	Continue draft of Reply brief in support of Motion for Rule 11 Sanctions in CP case; research re same and legal analysis;	1	650.00
1/26/2022	Receive and review via ECF State Defendants' opposition to Plaintiffs' MSJ and supporting papers in CP case; legal analysis re same;	1.9	1,235.00
1/26/2022	Receive and review via email letter to Judge Hillman re courtesy copies in CP case;	0.1	0.00
1/26/2022	Strategy discussion and legal analysis of key cases in preparation for trial in CP case;	0.7	455.00
1/26/2022	Continue draft of Reply brief in support of Motion for Rule 11 Sanctions in CP case; research re same and legal analysis;	0.8	520.00
1/27/2022	Amend and supplement draft of Reply brief in support of Motion for Rule 11 Sanctions in CP case; email to co-counsel for review of draft;	2.5	1,625.00
1/27/2022	Receive and review article that NJ legislation approval additional special education ALJs was signed into law and legal analysis re same;	0.2	130.00
1/28/2022	Amend and supplement Reply brief to Motion for Sanctions in CP case; email to co-counsel for final comments and changes and legal analysis;	0.7	455.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/6/2022	2233

Bill To

Due Date
2/6/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
1/28/2022	Review and amend Reply in support of Motion for Rule 11 Sanctions in CP case and approve for final and filing;	0.5	325.00
1/28/2022	Strategy discussion and legal analysis re ALJs at OAL and impact on CP case;	0.2	130.00
1/28/2022	Strategy discussion and legal analysis re reply to opposition to motion for sanctions in preparation for same in CP case;	0.8	520.00
1/29/2022	Receive and review via ECF Final Pretrial Memorandum in CP case; legal analysis re same;	1.1	715.00
1/29/2022	Receive and review via ECF Plaintiffs' Reply in Support of Motion for Sanctions in CP case;	0.3	0.00
		Total	\$23,725.00

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
3/1/2022	2258

Bill To

Due Date
3/1/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
2/1/2022	Strategy discussion and legal analysis re trial planning in CP case;	0.2	130.00
2/1/2022	Receive and review via ECF State Defendants' Reply in support of MSJ in CP case; legal analysis re same;	0.9	585.00
2/1/2022	Receive and review via ECF Plaintiffs' Reply in support of MSJ in CP case; legal analysis re same;	0.3	195.00
2/1/2022	Multiple correspondence exchange and strategy discussion re preparation of witnesses and anticipation of motions in CP case; legal analysis re same and advice given;	0.4	260.00
2/5/2022	Strategy discussion and legal analysis re false position of State Defendants that special ed attorneys are to blame for adjournments, not the OAL, and preparation to counter that issue at trial with legal strategy in CP case;	0.4	260.00
2/9/2022	Correspondence exchanges with State Defendants counsel re Worthington deposition for use at trial in CP case;	0.3	195.00
2/9/2022	Correspondence to clients re preparation for trial testimony in CP case;	0.4	260.00
2/10/2022	Prepare win-loss scenario analysis and legal proofs for trial; review multiple correspondence re same;	1	650.00
2/10/2022	Receive and review multiple correspondence and subpoenae for trial testimony of witnesses and plaintiffs' exhibits in CP case; legal analysis re same;	0.4	260.00
2/11/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re schedule for final PTC in CP case;	0.1	65.00
2/13/2022	Multiple correspondence exchanges with co-counsel re discovery ruling and status with Judge Hillman in CP case and impact on further depositions in preparation for trial;	0.7	455.00
2/14/2022	Receive and review via ECF Order text from Judge Hillman re adjourning PTC and trial dates in CP case;	0.1	65.00
2/14/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re streamlining trial in CP case;	0.1	0.00
2/14/2022	Receive and review via ECF letter from co-counsel to Judge Skahill re omnibus motion to seal in CP case;	0.2	0.00
2/15/2022	Receive and review via ECF Order from Judge Skahill granting ext time to file motion to seal in CP case;	0.1	65.00
		Total	

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
3/1/2022	2258

Bill To

Due Date
3/1/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
2/16/2022	Multiple correspondence exchanges re 2/22 Final PTC with Judge Hillman via Zoom in CP case; legal analysis re same and issues to be presented;	0.3	195.00
2/18/2022	Receive and review via ECF joint letter to Judge Hillman re streamlining CP case; legal analysis re same in preparation for 2/22 conference;	0.1	65.00
2/18/2022	Receive and review via ECF Order text from Judge Hillman changing time of final PTC in CP case;	0.1	0.00
2/21/2022	Email exchange with client re preparation for trial testimony in CP case and legal advice re same;	0.1	65.00
2/21/2022	Receive and review via ECF State Defendants' opposition to Motion pro hac vice of Little; legal analysis re same;	0.4	260.00
2/22/2022	Prepare for and participate in zoom conference with co-counsel in preparation for status conference with Judge Hillman and legal analysis and strategy;	0.9	585.00
2/22/2022	Prepare for and participate in zoom conference with Judge Hillman re status of CP case, pending motions, and trial date; legal analysis and strategy;	1.2	780.00
2/22/2022	Prepare for and participate in post-mortem zoom conference with co-counsel following status conference with Judge Hillman and legal analysis and strategy;	0.4	260.00
2/23/2022	Email to co-counsel re trial availability and legal strategy re trial dates in CP case;	0.1	65.00
2/24/2022	Receive and review via ECF Plaintiffs' Reply in support of motion pro hac vice for Little; legal analysis re same;	0.3	195.00
2/24/2022	Strategy discussion with co-counsel re trial dates and preparation for same in CP case;	0.3	195.00
2/28/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re discovery issue prior to trial date in CP case;	0.3	195.00
		Total	\$6,305.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/3/2022	2274

Bill To

Due Date
4/3/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/1/2022	Receive and review via ECF Order by Judge Hillman granting pro hac vice application of Little with opinion in CP case; legal analysis re same;	0.2	130.00
3/2/2022	Receive and review via ECF notice to clerk for pro hac vice Little to receive electronic case notices in CP case;	0.1	0.00
3/2/2022	Receive and review via ECF minute entry of hearing 2/22/22 before Judge Hillman on pro hac vice application;	0.1	0.00
3/2/2022	Receive and review via ECF Order by Judge Hillman converting 3/8 status conference to motion hearing date in CP case; legal analysis re same;	0.2	130.00
3/3/2022	Strategy discussion and legal analysis re NJSBA School Law committee meeting and representations made by OAL ALJs re changes to special ed dispute resolution process and impact on discovery and issues in CP case;	0.4	260.00
3/3/2022	Receive and review via ECF letter from OAL counsel to Judge Hillman re 3/8 motion hearing; legal analysis re same;	0.2	130.00
3/3/2022	Strategy discussions and multiple correspondence with legal analysis re public statements by ALJs and impact on discovery and class action issues in CP case;	0.4	260.00
3/4/2022	Prepare for and participate in strategy discussion and legal analysis in preparation for 3/8 motion hearing with Judge Hillman in CP case;	1.1	715.00
3/7/2022	Strategy discussions and legal analysis in preparation for 3/8 conference and motion hearing with Judge Hillman in CP case;	1.3	845.00
3/7/2022	Email exchange with co-counsel re fees incurred to date and pro forma for settlement or fee petition purposes in CP case;	0.9	585.00
3/8/2022	Prepare for and participate in motion hearing before Judge Hillman via Zoom in CP case;	2.1	1,365.00
3/8/2022	Strategy discussion and legal analysis with co-counsel in CP case re class certification and supplemental discovery and impact on other cases;	0.7	455.00
3/9/2022	Receive and review via ECF Text Order re 3/8 status conference, supplemental discovery issues, and trial off calendar in CP case; legal analysis re same;	0.2	130.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/3/2022	2274

Bill To

Due Date
4/3/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/9/2022	Receive and review draft letter to Judge Hillman in CP case re supplemental discovery; legal analysis and strategy discussion re same;	0.6	390.00
3/9/2022	Receive and review via ECF Minute Entry re 3/8/22 hearing with Judge Hillman in CP case;	0.1	0.00
3/10/2022	Legal research and analysis and strategy discussion with co-counsel on CP case re Rule 23(b)(3) class requirements;	0.8	520.00
3/10/2022	Receive and review multiple correspondence via email re proposed changes to letter to Judge Hillman re supplemental discovery and NJ legislature bill assigning \$6M to sped unit at OAL and impact on CP case;	0.3	195.00
3/10/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re supplemental discovery in CP case and class certification issues; legal analysis re same;	0.2	130.00
3/10/2022	Multiple correspondence and strategy discussion with co-counsel re recent actions by NJDOE and OAL and impact on CP case;	0.7	455.00
3/11/2022	Strategy discussion and legal analysis re 2023 NJ budget proposal and special ed proposed expenditures and impact on CP case and class action;	0.4	260.00
3/11/2022	Receive and review via ECF Letter from State Defendants' counsel to Judge Hillman re supplemental discovery in CP case; legal analysis re same;	0.3	195.00
3/13/2022	Multiple correspondence and legal analysis and strategy re response to Court re supplemental discovery and State Defendants' position re same in CP case; review proposed letter to Judge Hillman re same;	0.6	390.00
3/14/2022	Strategy discussion and legal analysis re supplemental depositions and post 2020 discovery in CP case;	0.4	260.00
3/14/2022	Receive and review via ECF letter from co-counsel to Judge Hillman as reply on issues of supplemental discovery and scope of trial in CP case; legal analysis re same;	0.3	195.00
3/15/2022	Receive and review via ECF Notice of Appearance of DAG Meyers for State Defendants in CP case;	0.1	65.00
		Total	

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
4/3/2022	2274

Bill To

Due Date
4/3/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/16/2022	Receive and review via ECF Order and Opinion from Judge Hillman re appeal of Judge Williams' decision on deliberative process privilege and supplemental discovery in CP case; legal analysis re same;	0.8	520.00
3/17/2022	Review file and prepare lengthy status report to clients re JA class action case;	0.6	390.00
3/22/2022	Receive and review via email letter from co-counsel to State Defendants' counsel re supplemental discovery and deposition notices of Rota, Ehling, and NJDOE 30b6 in CP case; legal analysis re same;	0.4	260.00
3/22/2022	Receive and review via ECF Order and Opinion from Judge Hillman on Motion to Consolidate, granting consolidation of two JA individual cases, denying consolidation with JA class action or Doe case; legal analysis re same; prepare report to client re same;	0.5	325.00
3/22/2022	Strategy discussion and legal analysis re impact of Order and Opinion from Judge Hillman on Motion to Consolidate in JA class action on CP case;	0.3	195.00
3/23/2022	Prepare case analysis and status of all related individual cases to class actions pending before Judge Hillman for overall case management, strategy, and discovery discussions;	0.8	520.00
3/23/2022	Receive and review via email letter from co-counsel to State Defendants' counsel re notice of intent to serve subpoenae and subpoenae for Baa, Moscowitz, and OAL in CP case; legal analysis re same;	0.3	195.00
3/23/2022	Extensive strategy discussion and legal analysis re sharing discovery from State Defendants across individual cases and Judge Skahill's striking of OAL's confidentiality designations in CP case; legal analysis re same and application to other cases and proposed letter to State Defendants' counsel;	1.3	845.00
3/30/2022	Receive and review discovery documents re authorization for payment to OAL for due process cases from NJDOE in CP case; legal analysis re same;	0.4	260.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/3/2022	2274

Bill To

Due Date
4/3/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/30/2022	Strategy discussion and legal analysis re letter to State Defendants counsel re sharing discovery from NJDOE and OAL in CP case with other related individual cases; review and revise letter to counsel re same;	0.7	455.00
3/30/2022	Receive and review supplemental document production from State Defendants for post-2020 time period; legal analysis re same;	1.4	910.00
3/31/2022	Email to co-counsel re Order and Opinion from Judge Hillman on State Defendants' MTD in J.A. individual case and allowing most claims to proceed and legal analysis and strategy re same, including impacts on C.P. and J.A. class actions;	0.3	195.00
3/31/2022	Receive and review draft letter to State Defendants' counsel re using discovery from CP case in other individual cases; strategy discussion and legal analysis re same with Steering Committee; amend and supplement draft; discuss impact on recent decisions by Judge Hillman on State Defendants' MTDs in other cases;	0.8	520.00
3/31/2022	Strategy discussion and legal analysis re discovery in CP case and documents authorization for payment to OAL for due process cases from NJDOE in CP case;	0.4	260.00
3/31/2022	Correspondence exchange with State Defendants' counsel re sharing discovery from CP case;	0.2	130.00
		Total	\$14,040.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
5/2/2022	2293

Bill To

Due Date
5/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
4/8/2022	Numerous correspondence and subpoenas re depositions and documents supplemental discovery in CP case; legal analysis re same;	0.7	455.00
4/9/2022	Numerous correspondence exchanges re other cases to use as cross-examination for 45 Day violations in last two years in CP case;	1.1	715.00
4/11/2022	Strategy discussion re deposition of Moscowitz in CP case and motion to withdraw in Wrights' cases impact on deposition;	0.9	585.00
4/12/2022	Receive and review via email outline for Moscowitz deposition in CP case; legal analysis re same;	0.4	260.00
4/12/2022	Receive and review via email correspondence from OAL counsel re depositions of Bass and Hendricks in CP case;	0.2	130.00
4/13/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re mediation in CP case; legal analysis re same;	0.1	65.00
4/13/2022	Receive and review via email draft letter from co-counsel to Judge Hillman re mediation in CP case; legal analysis re same;	0.3	195.00
4/13/2022	Receive and review via ECF Text Order from Judge Hillman re parties' statements regarding mediation in CP case;	0.1	65.00
4/13/2022	Receive and review via email documents marked as exhibits to ALJ Moscowitz's deposition in CP case; legal analysis re same;	0.6	390.00
4/13/2022	Multiple correspondence re strategy discussion and legal analysis of Moscowitz depo in CP case;	1.2	780.00
4/14/2022	Receive and review via email correspondence from co-counsel re mediation and State Defendants' letter to Court re same; strategy discussion and legal analysis re same;	0.2	130.00
4/14/2022	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman re mediation in CP case; legal analysis re same;	0.2	130.00
4/14/2022	Receive and review via email correspondence from co-counsel to State Defendants' counsel re supplemental document requests from 30b6 depo in CP case; legal analysis re same;	0.2	130.00
4/29/2022	Receive and review via email correspondence re Hendricks supplemental deposition in CP case;	0.2	130.00
		Total	\$4,160.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
6/2/2022	2308

Bill To

Due Date
6/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/1/2022	Receive and review via email correspondence from co-counsel to State Defendants' counsel re supplemental documents requested during 30(b)(6) depo in CP case; legal analysis re same;	0.2	130.00
5/1/2022	Receive and review via email State Defendants supplemental production of documents from depositions in CP case; legal analysis re same;	0.4	260.00
5/1/2022	Receive and review via email depo transcript of Ehling supp in CP case; legal analysis re same;	0.9	585.00
5/1/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re mediation in CP case; legal analysis re same;	0.1	65.00
5/1/2022	Receive and review via email correspondence from co-counsel re certifications of clients and documents in preparation for ALJ Bass depo in CP case; legal analysis re same;	0.2	130.00
5/1/2022	Receive and review via email and strategy discussion re State Defendants' counsel objections re proposed protective order on discovery produced in CP class action, legal arguments re same, and proposed approach to compromise;	0.4	260.00
5/2/2022	Receive and review via ECF letter from OAL' counsel to Judge Skahill re subpoenae for deposition of Hendricks and request for discovery conference in CP case; legal analysis re same;	0.3	195.00
5/2/2022	Strategy discussion and legal analysis re draft letter to Judge Skahill re subpoenae to OAL / Hendricks for deposition in CP case; receive and review via ECF filed letter re same;	0.3	195.00
5/2/2022	Receive and review depo transcript of ALJ Moscowitz; legal analysis re same;	0.8	520.00
5/2/2022	Receive and review via ECF Text Order from Judge Hillman re mediation / settlement conference with Judge Skahill 6/9 and settlement memoranda to be submitted by 6/2 in CP case; legal analysis re same;	0.2	130.00
5/3/2022	Review draft letter to Judge Skahill re depo of Hendricks via subpoena and strategy discussion and legal analysis re same in CP case;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
6/2/2022	2308

Bill To

Due Date
6/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/3/2022	Receive and review via ECF letter from co-counsel to Judge Skahill re plaintiffs' (putative class) position on consolidation of discovery in related cases; legal analysis re same and draft of letter prior to filing;	0.3	195.00
5/5/2022	Receive and review via email Statement on the Record for Hendricks missing deposition pursuant to subpoena in the CP case; legal analysis re same;	0.3	195.00
5/6/2022	Review draft settlement demand letter to NJDOE; strategy discussion and legal analysis re same in preparation for mediation;	0.4	260.00
5/6/2022	Strategy discussion and legal analysis re initial settlement demand and attorney's fees as part of demand in preparation for mediation in CP case;	0.4	260.00
5/6/2022	Strategy discussion and legal analysis of draft letter to Judge Skahill re related cases and discovery from CP case and relief from protective order;	0.4	260.00
5/6/2022	Strategy discussion and legal analysis re settlement demand to NJDOE in preparation for settlement conference with Judge Skahill in CP case;	0.5	325.00
5/9/2022	Correspondence exchange via email re Plaintiffs' settlement demand in CP case in preparation for settlement conference and statement;	0.5	325.00
5/10/2022	Prepare for and participate in status conference with Judge Skahill re discovery dispute and depo of OAL 30b6 by subpoena and settlement conference; receive and review via ECF minute entry re same;	0.4	260.00
5/10/2022	Receive and review via ECF Text order from Judge Skahill setting telephone conference re discovery dispute in CP case;	0.1	65.00
5/10/2022	Multiple correspondence exchanges re OAL's argument that discovery is stayed pending mediation and whether settlement conference is referral to mediation under LCivR 301.1; legal analysis re same and strategy discussion re same;	0.6	390.00
5/11/2022	Receive and review via ECF letter from co-counsel to Judge Skahill re CP case class action protective order and consolidation of discovery in multiple cases; legal analysis re same;	0.3	195.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
6/2/2022	2308

Bill To

Due Date
6/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/11/2022	Receive and review via ECF lengthy text Order from Judge Skahill re consolidating discovery across cases and adjourning status conferences and requiring meet and confer by all counsel and report by 5/20 re same; legal analysis re same;	0.4	260.00
5/11/2022	Receive and review via email exhibits used during supplemental Bass depo in CP case; legal analysis re same;	0.4	260.00
5/12/2022	Receive and review via ECF Text Order from Judge Skahill re supplemental discovery in CP case;	0.1	65.00
5/13/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re supp discovery completed and ready for trial in CP case;	0.1	65.00
5/13/2022	Receive and review via ECF letter from co-counsel to Judge Skahill re Hendricks depo no longer necessary in CP case;	0.1	65.00
5/16/2022	Strategy discussion and legal analysis re correspondence from State Defendants to Court re trial date and settlement conference in CP case;	0.5	325.00
5/16/2022	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman re trial date and settlement conference in CP case;	0.3	195.00
5/17/2022	Multiple exchanges with counsel re consolidation of discovery and objections re same in preparation for meet and confer on 5/18;	0.8	520.00
5/17/2022	Receive and review via ECF Trial Notice from Judge Hillman for 9/6 - 9/9 in person in CP case; legal analysis re same;	0.2	130.00
5/19/2022	Prepare extensive draft letter to Judge Skahill re 5/18 meet and confer and open issues and objections re consolidation of discovery; review files re same; review prior orders of court re same; email to counsel for comments and changes;	0.8	520.00
5/20/2022	Receive and review via ECF letter from State Defendants' counsel to Judge Skahill re consolidating discovery and exhibits with meet and confer changes;	0.5	325.00
5/20/2022	Amend and supplement meet and confer letter to Judge Skahill re consolidation of discovery; multiple email exchanges with counsel re same; file and serve same via ECF;	0.7	455.00
5/23/2022	Receive and review via ECF letter from co-counsel to Judge Skahill re consolidating discovery and protective order and position of putative class in CP case;	0.2	130.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
6/2/2022	2308

Bill To

Due Date
6/2/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
5/24/2022	Strategy discussion and legal analysis re approach to settlement conference and trial tactics;	1.1	715.00
5/25/2022	Receive and review via ECF Order from Judge Skahill granting pro hac vice Fleming; legal analysis re same;	0.2	130.00
5/25/2022	Strategy discussion and legal analysis re consolidating discovery and FERPA issues in both JA and CP class actions;	0.9	585.00
5/27/2022	Receive and review via ECF Order from Judge Skahill re procedures and meet and confer on consolidation of discovery; legal analysis re same;	0.4	260.00
5/28/2022	Receive and review via email settlement demand sent to State Defendants in CP case; strategy discussion and legal analysis with colleagues re same;	0.5	325.00
5/31/2022	Strategy discussion and legal analysis with colleagues re settlement demand and negotiating points in preparation for settlement conference with Judge Skahill in CP case;	0.6	390.00
5/31/2022	Multiple email exchanges with Judge Skahill and counsel re settlement conference date and status in CP case;	0.4	260.00
		Total	\$11,375.00

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
7/4/2022	2324

Bill To

Due Date
7/4/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
6/2/2022	Receive and review Plaintiffs' mediation statement to Judge Skahill in CP case for settlement conference; legal analysis re same; inquiry re NJDOE's statement;	0.7	455.00
6/3/2022	Review 2021-22 MOUs from NJDOE to OAL for special education cases; legal analysis re same and add to general repository;	0.7	455.00
6/3/2022	Receive and review via email State Defendants' 4/6/22 supplemental production in CP case in preparation for creation of document repository for related cases;	0.6	390.00
6/3/2022	Multiple correspondence re settlement discussions in CP case and NJDOE's settlement offer; legal analysis re same;	1.3	845.00
6/5/2022	Create billing summary / pro forma for CP case in preparation of settlement conference with Judge Skahill and memo re hourly rates with justification therefor and legal analysis;	1.3	845.00
6/6/2022	Receive and review supplemental depo transcript of ALJ Bass in CP case; legal analysis re same and impact on individual cases;	1.2	780.00
6/8/2022	Receive and review via email Adam X case and settlement agreement with ACLU and NJDOE in preparation for settlement conference in CP case; legal analysis re same;	0.4	260.00
6/8/2022	Prepare for and participate in strategy discussion and legal analysis in preparation for settlement conference in CP case; offer legal advice and input into potential negotiating points;	1.6	1,040.00
6/10/2022	Multiple email exchanges with co-counsel, strategy discussion, and legal analysis re settlement conference and preparation for trial and additional settlement negotiations in CP case;	0.8	520.00
6/12/2022	Continue review of discovery from CP class action and analyzing relevance to related cases for consolidation purposes;	1	650.00
6/13/2022	Receive and review via ECF Text Order from Judge Skahill re settlement proceedings in CP case;	0.1	65.00
6/13/2022	Continue review of discovery from CP class action and analyzing relevance to related cases for consolidation purposes; create chart of proposed shared discovery; prepare meet and confer letter to counsel with proposed shared discovery and scheduling order in JA case;	2.5	1,625.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
7/4/2022	2324

Bill To

Due Date
7/4/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
6/16/2022	Strategy discussion with co-counsel re issues for trial and settlement in CP case;	0.7	455.00
6/17/2022	Prepare correspondence to co-counsel re pro forma for services in CP case for purposes of settlement discussions;	0.3	195.00
6/17/2022	Email exchanges and strategy discussion re status of OAL and Chief ALJ of special education;	0.3	195.00
6/21/2022	Correspondence exchange and strategy discussion with co-counsel re settlement negotiations and model for OAL special ed dispute resolution in CP case;	0.4	260.00
6/21/2022	Receive and review Plaintiffs' draft Settlement Position Statement to Judge Skahill in CP case; legal analysis re same; provide suggested changes to same; strategy discussion re same before submission on 6/23;	1.8	1,170.00
6/23/2022	Receive and review via email Plaintiffs' final letter and settlement position with proposed injunction language to Judge Skahill for settlement discussions in CP case;	0.4	260.00
		Total	\$10,465.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
8/3/2022	2334

Bill To

Due Date
8/3/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
7/6/2022	Receive and review via ECF letter from State Defendants to Judge Hillman requesting adjournment of trial date because of settlement discussions in CP case; legal analysis re same;	0.4	260.00
7/6/2022	Strategy discussion re letter from State Defendants to Judge Hillman requesting adjournment of trial date because of settlement discussions in CP case;	0.3	195.00
7/7/2022	Receive and review via ECF letter from lead Plaintiffs' counsel to Judge Hillman objecting to any adjournment of trial date and settlement status in CP case; legal analysis re same;	0.3	195.00
7/11/2022	Receive and review via ECF lengthy letter from State Defendants' counsel to Judge Hillman re request to adjourn trial in CP case; legal analysis re same;	0.4	260.00
7/14/2022	Receive and review via ECF Order from Judge Skahill re continuance of settlement conference in CP case on 7/25/22; legal analysis re same;	0.1	65.00
7/25/2022	Receive and review via ECF Minute Entry re status conference with Judge Skahill in CP case;	0.1	0.00
7/26/2022	Multiple email exchanges with CP co-counsel and strategy discussions re settlement and inclusion of JA class action claims; legal analysis re same;	0.9	585.00
8/3/2022	Email to co-counsel in CP case re legal analysis, advice, and strategy re status of class action cases and comparison to other class actions before Hillman;	0.4	260.00
8/3/2022	Receive and review email from co-counsel in CP case re analysis of pending motions and settlement status;	0.2	130.00
		Total	\$1,950.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/12/2022	2347

Bill To

Due Date
9/12/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/10/2022	Email exchanges re subpoenas being served on school district counsel by State Defendants' counsel in CP case and legal strategy re same;	0.3	195.00
8/11/2022	Receive and review numerous trial subpoenas for NJDOE and OAL witnesses in CP case; legal analysis re same;	0.4	260.00
8/12/2022	Multiple email exchanges with co-counsel re updated websites for NJDOE and OAL and possible spoliation issues in CP case; legal strategy and discussion re same;	0.8	520.00
8/15/2022	Strategy discussion and legal analysis re new transmittal hearing notice form and changes made by NJDOE and implications in CP and JA class actions;	0.5	325.00
8/17/2022	Strategy discussion and legal analysis re Ehling deposition and admissions by State Defendants' witnesses in CP case;	0.4	260.00
8/18/2022	Strategy discussion and legal analysis with co-counsel on trial and settlement in CP case;	0.5	325.00
8/18/2022	Strategy discussion and legal analysis re pending motions, status of settlement, and lack of final PTC in CP case;	0.7	455.00
8/19/2022	Receive and review via ECF Opinion and Order from Judge Hillman re class certification in CP case; legal analysis re same;	2.6	1,690.00
8/19/2022	Strategy discussion and legal analysis with co-counsel re Opinion and Order from Judge Hillman re class certification in CP case;	2	1,300.00
8/20/2022	Receive and review email from lead counsel re status update and trial prep in CP case;	0.1	65.00
8/22/2022	Multiple email exchanges with co-counsel and strategy discussion re impact of Judge Hillman's Order / Opinion on class certification in CP case and legal analysis re same;	0.7	455.00
8/23/2022	Strategy discussion and legal analysis with co-counsel re trial prep and settlement discussions in CP case;	0.4	260.00
8/24/2022	Receive and review via email class action meeting notes of co-counsel re trial prep and settlement in CP case;	0.3	195.00
8/25/2022	Receive and review via ECF co-counsel's letter to Judge Hillman re trial status in CP case;	0.1	65.00
		Total	

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
9/12/2022	2347

Bill To

Due Date
9/12/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
8/26/2022	Strategy discussion and legal analysis re NJDOE document retention and impact on notification to the class and settlement negotiations in the CP case;	0.9	585.00
8/26/2022	Receive and review correspondence from co-counsel to NJDOE counsel re proposed notice to class members with key language and seeking cooperation in CP case;	0.4	260.00
8/27/2022	Strategy discussion, legal research, and analysis re NJDOE's and OAL's document retention and violation of rules on keeping records of due process hearings as evidence in class actions;	0.8	520.00
8/29/2022	Strategy discussion and status update on CP class action trial and settlement discussions;	0.3	195.00
8/30/2022	Receive and review via ECF State Defendants' Proposed Findings of Fact for trial in CP case; legal analysis re same and strategy discussion;	2.6	1,690.00
8/30/2022	Receive and review via ECF Plaintiffs' Proposed Findings of Fact in CP case; strategy discussion and legal analysis re same;	1.5	975.00
8/30/2022	Receive and review via ECF letter from co-counsel to Judge Hillman responding to State Defendants' letter request to stay proceedings pending appeal of Class Certification in CP case; legal analysis re same;	0.3	195.00
8/30/2022	Receive and review via ECF State Defendants' letter request to Judge Hillman to stay proceedings pending appeal of Class Certification in CP case; legal analysis re same;	0.4	260.00
8/30/2022	Strategy discussion and legal analysis re status of settlement negotiations and trial prep in CP case;	0.5	325.00
9/1/2022	Receive and review via ECF Judge Hillman's Opinion and Order on MSJs in CP case; legal analysis re same and impact on other pending IDEA cases;	2.2	1,430.00
9/1/2022	Receive and review via ECF Text Order from Judge Hillman re FPTC and new trial dates in CP case; legal analysis re same;	0.2	130.00
9/1/2022	Receive and review via ECF Text Order from Judge Hillman denying State Defendants' request for stay of trial in CP case; legal analysis re same;	0.1	65.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/12/2022	2347

Bill To

Due Date
9/12/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/1/2022	Strategy discussion and legal analysis re Opinions and Orders re pending motions and trial in CP case;	0.7	455.00
9/1/2022	Strategy discussion and legal analysis re State Defendants' Proposed Findings of Fact and evidence re subsequent remedial measures and timing of disclosures in CP case;	1.2	780.00
9/2/2022	Receive and review via ECF letter from co-counsel re PTC appearances;	0.1	65.00
9/2/2022	Strategy discussion and legal analysis re recent rulings by Judge Hillman, impact on trial and settlement, and tactics going forward in CP case;	0.8	520.00
9/3/2022	Strategy discussion and status update on trial prep and settlement discussions in light of recent decisions by Court in CP case;	0.6	390.00
9/6/2022	Receive and review via ECF minute entry re PTC held 9/6/22 in CP case;	0.1	0.00
9/7/2022	Receive and review via ECF Text Order from Judge Hillman granting extension in page limits for briefs nunc pro tunc in CP case;	0.1	65.00
9/7/2022	Receive and review via ECF letter from NJDOE counsel to Judge Hillman re motions in limine status in CP case; legal analysis re same;	0.3	195.00
9/7/2022	Receive and review via ECF Text Order from Judge Hillman re motions in limine moot in CP case;	0.1	65.00
9/7/2022	Receive and review via email proposed amendments to OAL procedural guidelines and requests for legal advice and strategy in CP case; legal analysis re same;	0.6	390.00
9/8/2022	Receive and review via ECF Minute Entry for proceedings held before Judge Noel L. Hillman: Motion Hearing held on 9/7/2022 re Defendant's [290] First MOTION in Limine, [291] Amended MOTION in Limine. Decision Reserved; Opinion and Order to be entered. Hearing on joint application by counsel to amend [389,392] Proposed Findings of Fact; Ordered application Granted. Motion hearing set for Thursday, 9/8/2022 has been canceled. Bench Trial has been scheduled on Monday, 10/3/2022 at 9:30 a.m., Courtroom 3A in CP case;	0.2	130.00
		Total	

Invoice



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Date	Invoice #
9/12/2022	2347

Bill To

Due Date
9/12/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/8/2022	Receive and review via ECF Order from Judge Hillman re motions in limine on trial testimony of Rebecca K. Spar, Esq., Jennifer Rosen-Valverde, Esq. in CP case; legal analysis re same;	0.4	260.00
9/9/2022	Strategy discussion and legal analysis re settlement negotiations and trial prep with legal advice in CP case;	0.4	260.00
Total			\$16,575.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/28/2022	2355

Bill To

Due Date
9/28/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/8/2022	Receive and review via eCourts State Defendants' petition for interlocutory appeal on class certification; legal analysis re same;	1.8	1,170.00
9/8/2022	Receive and review via eCourts clerk notice re designated filer;	0.1	65.00
9/8/2022	Receive and review via ECF notices of appearance of Rue, Reisman in 3rd circuit;	0.2	130.00
9/9/2022	Receive and review via ECF letter application from State Defendants' counsel re schedule for motion to stay;	0.1	65.00
9/9/2022	Receive and review via ECF State Defendants' Motion to Stay Trial Pending Appeal and supporting documents; legal analysis re same;	1.4	910.00
9/12/2022	Email exchanges with co-counsel re status of proposed mediation with NJDOE;	0.2	130.00
9/12/2022	Legal research and prepare lengthy email re response to State Defendants' motion to stay trial and issue of harm to plaintiffs;	0.4	260.00
9/12/2022	Receive and review via email status update report from co-counsel on trial prep, settlement / mediation, et al.; legal analysis re same;	0.4	260.00
9/12/2022	Receive and review via ECF Plaintiffs-Respondents opposition to State Defendants petition for interlocutory appeal in 3rd Circuit of class certification ruling; legal analysis re same;	1.2	780.00
9/13/2022	Receive and review via ECF letter application from counsel to Judge Hillman re bifurcation of trial to two classes; legal analysis of same;	0.4	260.00
9/14/2022	Receive and review via ECF Text Order from Judge Hillman re briefing and argument on bifurcation of case;	0.1	65.00
9/15/2022	Receive and review via ECF Plaintiffs' Opposition to State Defendants' Motion to Stay Proceedings and supporting documents; legal analysis re same;	1.3	845.00
9/16/2022	Receive and review via email exchange of witness lists by all parties; legal analysis re same;	0.3	195.00
9/16/2022	Receive and review via email prior ex parte settlement letters to Judge Skahill and lengthy email from co-counsel to State Defendants' counsel re final settlement positions prior to trial and invitation to continue negotiations in light of same; legal analysis re same;	0.9	585.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/28/2022	2355

Bill To

Due Date
9/28/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/16/2022	Strategy discussion and legal analysis re issues related to State Defendants reluctance to settle and trial prep;	0.6	390.00
9/19/2022	Receive and review via ECF Plaintiffs' motion to sever or bifurcate the B2 and B3 classes and letter brief in support; legal analysis re same;	0.4	260.00
9/19/2022	Receive and review via ECF State Defendants' opposition to motion to sever or bifurcate the B2 and B3 classes and letter brief in support in CP case; legal analysis re same;	0.5	325.00
9/19/2022	Receive and review via ECF State Defendants' petition to file reply in support of interlocutory appeal petition and proposed brief; legal analysis re same;	1.4	910.00
9/19/2022	Receive and review via ECF Plaintiffs' list of joint stipulated exhibits for trial; legal analysis re same;	0.4	260.00
9/20/2022	Receive and review via ECF Text Order from Judge Hillman re NJDOE record keeping for purpose of class notice and ordered discovery re same; legal analysis re same;	0.4	260.00
9/20/2022	Receive and review via ECF minute entry re hearing on bifurcation issue held 9/19/22;	0.1	0.00
9/21/2022	Receive and review via ECF Plaintiffs petition in 3rd Circuit to file surreply on State Defendants' interlocutory appeal;	1.1	715.00
9/22/2022	Strategy discussion and legal analysis re settlement proposal of B2 and B3 class claims;	1.3	845.00
9/22/2022	Receive and review via ECF letter to Judge Hillman re exhibits that are not stipulated; legal analysis re same;	0.5	325.00
9/23/2022	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman advising of motion to stay trial filed in 3rd Circuit and timing of similar motion in District Court; legal analysis re same;	0.3	195.00
9/23/2022	Receive and review via ECF State Defendants' emergency motion to stay trial filed in 3rd Circuit and exhibits; legal analysis re same;	1.2	780.00
9/23/2022	Receive and review via ECF Text Order from Judge Hillman granting adjournment of deposition of 30(b)(6) witness on contact information of class members;	0.1	65.00
		Total	



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
9/28/2022	2355

Bill To

Due Date
9/28/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/23/2022	Receive and review via ECF letter application to Judge Hillman to adjourn 30(b)(6) depo NJDOE re record keeping of class members; legal analysis re same;	0.2	130.00
9/23/2022	Email exchange and strategy discussion with co-counsel re settlement position and appeal issues;	0.1	65.00
9/26/2022	Receive and review via ECF Order from 3rd Circuit granting and denying in part petition to appeal and putting in abeyance motion to stay trial; legal analysis re same;	0.4	260.00
9/27/2022	Strategy discussion and legal analysis re 3rd Circuit granting appeal and putting in abeyance motion to stay trial;	0.3	195.00
		Total	\$11,700.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
10/4/2022	2364

Bill To

Due Date
10/4/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
9/27/2022	Receive and review via ECF joint Letter application to Judge Hillman requesting 30 day ext of trial; legal analysis re same;	0.2	130.00
9/28/2022	Strategy discussion and legal analysis re mediation and impact on JA Class Action as well as enforceability and status of class;	1.3	845.00
9/28/2022	Strategy discussions and legal analysis re status of trial in light of recent progress in mediation and impact on JA class action;	0.5	325.00
9/28/2022	Receive and review via ECF notices of appeal and appeal filed in 3rd Circuit;	0.3	195.00
9/28/2022	Receive and review via ECF Letter from State Defendants' counsel withdrawing emergency motion to stay in 3rd Circuit; legal analysis re same;	0.3	195.00
9/28/2022	Receive and review via ECF Text Order from Judge Hillman granting 30 day ext of trial; legal analysis re same;	0.1	65.00
9/29/2022	Receive and review via ECF Text Order from Judge Hillman denying State Defendants' Motion to Stay without prejudice as moot; legal analysis re same;	0.1	65.00
9/29/2022	Receive and review via ECF letter from counsel to Judge Hillman re joint request to withdraw NJDOE 30b6 depo as moot; legal analysis re same;	0.3	195.00
9/30/2022	Receive and review via ECF Text Order from Judge Hillman re vacating Order on NJDOE 30b6 depo as moot;	0.1	65.00
9/30/2022	Receive and review via email proposed modification of class definition; strategy discussion and legal analysis re same;	0.6	390.00
10/3/2022	Strategy discussion and legal analysis re settlement and prevailing party fees in mediation and impact on JA class action and individual cases;	0.7	455.00
10/3/2022	Receive and review via email class action case in EDVa re broken due process system and VDOE; legal analysis re same; strategy discussion and legal analysis with co-counsel re application to CP class action and related issues;	0.7	455.00
10/3/2022	Receive and review via email USDOE's response to NJDOE action plan on 15 Day Rule and enforcement failure; strategy discussion and legal analysis re impact on CP case, settlement, and legal issues;	0.8	520.00
		Total	\$3,900.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
11/3/2022	2373

Bill To

Due Date
11/3/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
10/4/2022	Legal analysis re fee application and strategy discussion in light of settlement negotiations / mediation;	0.5	325.00
10/6/2022	Receive and review via ECF notice of deadlines for motion for pro hac vice Ellison;	0.1	0.00
10/6/2022	Receive and review via ECF Motion Pro Hac Vice Ellison;	0.2	0.00
10/11/2022	Strategy discussion and legal analysis with co-counsel re mediation discussions and position of State Defendants and analysis of issues raised by mediator;	0.5	325.00
10/21/2022	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman requesting to reinstate motion to stay trial; legal analysis re same;	0.2	130.00
10/21/2022	Strategy discussion and legal analysis in light of mediation status and letter to Judge Hillman requesting to reinstate motion to stay trial;	0.7	455.00
10/24/2022	Prepare for and participate in strategy discussion and legal analysis re letters to Judge Hillman re motion to stay trial and settlement;	1.3	845.00
10/24/2022	Receive and review via ECF letter from co-counsel to Judge Hillman re State Defendants' motion to stay and proposed change to class certification; legal analysis re same;	0.4	260.00
10/25/2022	Receive and review via ECF letter from State Defendants to Judge Hillman re motion to stay and class certification change and request for status conf; legal analysis re same;	0.2	130.00
10/25/2022	Prepare updated pro forma for purposes of settlement conference / mediation and ongoing negotiations prior to trial;	0.5	325.00
10/26/2022	Receive and review via ECF notice of transcript of 9/19/22 conference before Judge Hillman;	0.1	0.00
10/26/2022	Receive and review via ECF Text Order from Judge Hillman re motion to stay reinstated and 11/2/22 status conf ordered; legal analysis re same;	0.2	130.00
10/27/2022	Strategy discussion and legal analysis re status of mediation, Judge Hillman intervention, Judge Schneider, and trial date;	0.7	455.00
10/31/2022	Receive and review via ECF Order granting Ellison pro hac vice;	0.1	0.00

		Total	
--	--	--------------	--



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
11/3/2022	2373

Bill To

Due Date
11/3/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount		
11/2/2022	Strategy discussion and legal analysis re mediation, status of settlement negotiations, impact on trial and other related cases, and adjournment of trial to 1/3/23;	1.1	715.00		
11/2/2022	Review State Defendants' joint letter to Judge Hillman re adjournment of trial; legal analysis re same; email to co-counsel inquiring as to status of settlement / mediation negotiations and impact on adjournment;	0.4	260.00		
<table border="1"> <tr> <td>Total</td> <td>\$4,355.00</td> </tr> </table>			Total	\$4,355.00	
Total	\$4,355.00				



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
12/4/2022	2384

Bill To

Due Date
12/4/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
11/1/2022	Receive and review via ECF letter from State Defendants' counsel Labin to Judge Hillman re joint adjournment request; legal analysis re same;	0.2	130.00
11/2/2022	Receive and review via ECF Text Order from Judge Hillman adjourning trial to 1/3/23 as per joint request of parties and motion to stay proceedings briefing schedule; legal analysis re same;	0.2	130.00
11/9/2022	Strategy discussion and legal analysis re status of State Defendants' settlement offer and response thereto and redline of proposed consent order;	1.1	715.00
11/17/2022	Receive and review via email proposed adjournment request form as part of proposed consent order; strategy discussion and legal analysis re same;	0.7	455.00
11/28/2022	Secondary review of response to State Defendants' settlement offer and proposed consent order; email to class counsel JRA with demand to not mention settlement discussions on any cases outside of CP class action;	0.5	325.00
		Total	\$1,755.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
12/19/2022	2394

Bill To

Due Date
12/19/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/5/2022	Prepare for and participate in strategy conference call with co-counsel re settlement and inclusion of JA class action in CP settlement and legal analysis re same;	1.2	780.00
12/5/2022	Receive and review via ECF letter from co-counsel to Judge Skahill re notice to class and legal issues re same; legal analysis re same;	0.3	195.00
12/5/2022	Receive and review email from co-counsel re settlement and fee petition; legal analysis re same;	0.2	130.00
12/6/2022	Receive and review via ECF letter from State Defendants' counsel to Judge Hillman re class notice and settlement discussions status;	0.3	195.00
12/6/2022	Receive and review via email lengthy letter from Class Counsel re settlement proposal and redline of Consent Order; legal analysis re same;	0.4	260.00
12/10/2022	Receive and review via ECF Plaintiffs' motion to approve notice to class and notice plan and supporting documents; legal analysis re same;	0.5	325.00
12/12/2022	Multiple email exchanges re participating in settlement / mediation with Judge Schneider on 12/14 to discuss overlap of claims and settlement re same; legal analysis re same;	0.4	260.00
12/14/2022	Receive and review via ECF Notice of Bench Trial scheduled for 1/3/2023; legal analysis re same;	0.1	65.00
12/14/2022	Prepare for and participate in mediation with Judge Schneider and all counsel on settlement teams; legal analysis and strategy re same; discuss impact on JA Class Action;	1	650.00
12/15/2022	Prepare updated supplemental fee information for anticipated fee petition; email same to Class Counsel;	0.3	195.00
12/15/2022	Receive and review via email from co-counsel revised version of Consent Order and settlement with comments for NJDOE; legal analysis re same; amend document with suggested changes re JA class action; email to co-counsel for review;	1.1	715.00
12/15/2022	Prepare draft Training Guidelines for ALJs as part of joint settlement with JA class action; email to all settlement counsel re same;	0.9	585.00

		Total	
--	--	--------------	--



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
12/19/2022	2394

Bill To

Due Date
12/19/2022

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/15/2022	Strategy discussion and legal analysis with co-counsel re joint settlement of class action cases and separate consent orders and settlement agreements;	0.8	520.00
Total			\$4,875.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/5/2023	2404

Bill To

Due Date
2/5/2023

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
12/19/2022	Receive and review via ECF State Defendants' Motion to Stay trial and dissemination of class notice; legal analysis re same	1.5	975.00
12/20/2022	Email exchange with Mediator Judge Schneider re status of settlement negotiations and impact on both class actions	0.2	130.00
12/21/2022	Receive and review via ECF State Defendants' Opposition to Plaintiffs' Motion to approve class notice; legal analysis re same	1.2	780.00
12/26/2022	Receive and review via ECF letter from class counsel re briefing schedule on pending motions	0.1	65.00
12/27/2022	Receive and review via ECF Plaintiffs' Reply in support of Motion to Approve Class Notice; legal analysis re same	0.7	455.00
12/28/2022	Receive and review via ECF joint letter from class counsel re limited consent order on issues of class notice and stay of trial; legal analysis re same;	0.4	260.00
12/30/2022	Receive and review via ECF Order by Judge Hillman addressing 3rd Circuit appeal and adjourning trial date to 2/6/23; legal analysis re same	0.3	195.00
1/10/2023	Receive and review via ECF Notice of application to withdraw Dylan as counsel;	0.2	0.00
1/18/2023	Receive and review via ECF Notice and Order from Third Circuit of dismissal of interlocutory appeal on class certification; legal analysis re same and impact on JA class action;	0.2	130.00
2/2/2023	Receive and review via ECF letter from co-counsel to Judge Hillman re settlement in principle and request for 2 week adjournment of trial; email exchanges with co-counsel re legal strategy and analysis of settlement agreement/consent order and impact on JA class action;	0.6	390.00
2/3/2023	Receive and review via ECF Order from Judge Hillman adjourning trial for 2 weeks pending tentative settlement agreement;	0.1	65.00
		Total	\$3,445.00



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
2/28/2023	2412

Bill To

Due Date
2/28/2023

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
2/21/2023	Receive and review via ECF Order entered by Judge Hillman adjourning trial; legal analysis re same;	0.1	52.50
2/22/2023	Receive and review via ECF letter from co-counsel to Judge Hillman re confidentiality of billing information for settlement purposes and proposed consent order re same; legal analysis re same;	0.3	157.50
2/22/2023	Receive and review via ECF CONSENT ORDER signed by Judge Skahill re confidentiality of billing information for settlement purposes;	0.1	52.50
			Total
			\$262.50



Thurston Law Offices LLC
 100 Springdale Rd A3
 PMB 287
 Cherry Hill NJ 08003

Invoice

Date	Invoice #
4/4/2023	2422

Bill To

Due Date
4/4/2023

Project	CP Class Action
---------	-----------------

Service Date	Description	Time	Amount
3/24/2023	Multiple email exchanges and legal analysis re CP settlement, challenges thereto from Amici, and town hall meetings with class members;	0.5	262.50
Total			\$262.50

Thurston Law Offices LLC
 100 Springdale Rd A3
 Cherry Hill, NJ 08003 US
 +1 8563355291
 rthurston@schoolkidslawyer.com
 http://schoolkidslawyer.com

Invoice



BILL TO
CP Class Action

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
2444	06/01/2023	\$630.00	07/01/2023	Net 30	

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
05/01/2023	525	Lengthy email exchanges with co-counsel re status of settlement with State, amicii input, and legal strategy and advice re same;	0:24	525.00	210.00
05/15/2023	525	Multiple phone calls with co-counsel re fees issue and settlement; email to group re conference to discuss legal advice and strategy re same;	0:48	525.00	420.00

SUBTOTAL	630.00
TAX	0.00
TOTAL	630.00
BALANCE DUE	\$630.00

Thurston Law Offices LLC
 433 River Road, Suite 1315
 Highland Park, NJ 08904 US
 +1 8563355291
 rthurston@schoolkidslawyer.com
 http://schoolkidslawyer.com

Invoice



BILL TO
CP Class Action

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
2482	12/03/2023	\$8,977.50	01/02/2024	Net 30	

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
11/11/2023	525	Begin draft of motion for final approval of settlement; legal research re same;	1:18	525.00	682.50
11/13/2023	525	Continue draft of motion for final approval of settlement; legal research re same;	1:36	525.00	840.00
11/15/2023	525	Prepare for, travel to, and participate in status conference re settlement and motion for preliminary approval;	3:06	525.00	1,627.50
11/16/2023	525	Continue draft of motion for final approval of settlement; legal research re same;	2:42	525.00	1,417.50
11/17/2023	525	Continue draft of motion for final approval of settlement;	0:42	525.00	367.50
11/19/2023	525	Continue draft of motion for final approval of settlement;	0:36	525.00	315.00
11/20/2023	525	Continue draft of motion for final approval of settlement;	3:48	525.00	1,995.00
11/27/2023	525	Continue draft of motion for final approval of settlement;	0:54	525.00	472.50
11/28/2023	525	Continue draft of motion for final approval of settlement;	0:30	525.00	262.50
11/29/2023	525	Receive and review proposed Notice to Class; amend Notice to conform to website; update class action website with additional information;	0:48	525.00	420.00
11/29/2023	525	Multiple emails re status conference and State Defendants' review of changes to settlement agreement;	0:18	525.00	157.50
11/29/2023	525	Receive and review via email final proposed versions of Consent	0:42	525.00	367.50

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
11/30/2023	525	Order and Settlement Agreement sent to NJDOE counsel; legal analysis re same in preparation for class action website and 12/8 status conference; Receive and review via ECF text Order from Judge Hillman changing date for status conference;	0:06	525.00	52.50

Thank you for your continued business! You can pay via PayPal, check, or credit card. Remember we have a new address.

SUBTOTAL	8,977.50
TAX	0.00
TOTAL	8,977.50
BALANCE DUE	\$8,977.50

Thurston Law Offices LLC
 433 River Road, Suite 1315
 Highland Park, NJ 08904

rthurston@schoolkidslawyer.com
 +1 (856) 335-5291
<http://schoolkidslawyer.com>



45 Day Violation Clients:Class Action:CP Class Action

Bill to
 CP Class Action

Invoice details
 Invoice no.: 2490
 Terms: Net 30
 Invoice date: 12/31/2023
 Due date: 01/30/2024

#	Date	Product or service	SKU	Qty	Rate	Amount
1.	12/29/2023	525 Continue draft of motion for final approval of consent order and settlement;		0.9	\$525.00	\$472.50
2.	12/28/2023	525 Continue draft of motion for final approval of consent order and settlement;		0.5	\$525.00	\$262.50
3.	12/26/2023	525 Receive and review email from co-Class Counsel re serving other AG's offices with notice; legal analysis re same;		0.2	\$525.00	\$105.00
4.	12/20/2023	525 Update Notice and class action website with notice information;		0.4	\$525.00	\$210.00
5.	12/19/2023	525 Receive and review via ECF numerous Orders entered by Judge Hillman re preliminary approval of settlement and mootng older motions;		1	\$525.00	\$525.00
6.	12/19/2023	525 Update class action website with all of the documents, deadlines/dates, and new information after 6/18 motion hearing;		0.8	\$525.00	\$420.00
7.	12/19/2023	525 Multiple email exchanges with co-Class Counsel re update to named plaintiffs, Notice, mediator, and still-existing delays for hearings within the system;		0.8	\$525.00	\$420.00
8.	12/18/2023	525 Prepare for, travel to, and participate in hearing before Judge Hillman re Motion for Preliminary Approval of Settlement;		3.4	\$525.00	\$1,785.00
9.	12/15/2023	525 Prepare for 6/18 motion hearing and email exchange with co-Class Counsel re potential objections and email from Jamie Epstein re same; EXHIBIT A TO R. THURSTON CERTIFICATION		1.8	\$525.00	\$945.00

10.	12/14/2023	525	1.6	\$525.00	\$840.00	Multiple communications and email exchanges with counsel re responding to objections, preparation for 12/18 hearing on preliminary motion to approve, update class action website, and strategy discussions going forward;
11.	12/13/2023	525	0.7	\$525.00	\$367.50	Numerous email exchanges re hearing date for motion for preliminary approval, contact with mediator, meeting with named plaintiffs, and updates to website for class members;
12.	12/12/2023	525	1.3	\$525.00	\$682.50	Numerous email exchanges and review of documents re meeting with named plaintiffs, receive and review via ECF notice of hearing on 12/18 for motion for preliminary approval and preparation for same, and class action website updates;
13.	12/11/2023	525	1.5	\$525.00	\$787.50	Numerous correspondence re final signed agreement by State Defendants and
14.	12/11/2023	525	1	\$525.00	\$525.00	Receive and review via ECF Motion for Preliminary Approval of Consent Order and Settlement Agreement and all supporting documents; legal analysis re same;
15.	12/09/2023	525	1.1	\$525.00	\$577.50	Multiple email exchanges with co-Class Counsel, JRA, and State Defendants' counsel re motion for preliminary approval, preparation for same, and incentive payments to named plaintiffs; legal analysis and strategy re same;
16.	12/08/2023	525	0.6	\$525.00	\$315.00	Multiple email exchanges with co-Class Counsel, JRA, and State Defendants' counsel re motion for preliminary approval, preparation for same, and incentive payments to named plaintiffs; legal analysis and strategy re same;
17.	12/06/2023	525	1.4	\$525.00	\$735.00	Numerous email exchanges re status of settlement agreement and State Defendants' approval, adjournment of 12/7 status conference, and motion for preliminary approval; legal analysis re same; receive and review via ECF Text Order from Judge Hillman adjourning 12/7 status conference based on representations that State Defendants will approve settlement agreement and filing of motion for preliminary approval;
18.	12/05/2023	525	0.5	\$525.00	\$262.50	Receive and review multiple email exchanges with class counsel and State Defendants' counsel re final version of Consent Order and Settlement Agreement as amended; legal analysis re same in preparation for motion for preliminary approval;
19.	12/04/2023	525	0.6	\$525.00	\$315.00	Legal analysis re delays and Class Action Fairness Act in preparation for 12/7 status hearing; zoom call with co-counsel re same;
20.	12/03/2023	525	0.2	\$525.00	\$105.00	Email exchange with co-class counsel re status of State Defendants' response to revised settlement agreement and preparation for 12/7/23 status conf;
21.	12/01/2023	525	0.8	\$525.00	\$420.00	Review recent caselaw in preparation for 12/7/23 status conf;

Total **\$11,077.50**

Ways to pay





Thurston Law Offices LLC
 8563355291
 433 River Road #1315
 Highland Park 08904

Billed To	Date of Issue	Invoice Number	Amount Due (USD)
CP Class Action	02/01/2024	0000013	\$15,697.50
	Due Date		
	02/01/2024		

Description	Rate	Qty	Line Total
Legal Services - Misc Robert Thurston – Jan 2, 2024 Continue draft of Motion for Final Approval of Settlement and supporting documents;	\$0.00	2.2	\$0.00
Legal Services - Standard Rate Robert Thurston – Jan 3, 2024 Receive and review via email transcript from 12/18/23 hearing on joint motion for preliminary approval of settlement before Judge Hillman; legal analysis and continued work on draft motion for final approval;	\$525.00	2.8	\$1,470.00
Legal Services - Standard Rate Robert Thurston – Jan 5, 2024 Continue draft of motion for final approval of settlement; begin collating billing information for attorneys' fees petition portion; multiple email exchanges with co-Class Counsel re same;	\$525.00	2.6	\$1,365.00
Legal Services - Standard Rate Robert Thurston – Jan 6, 2024 Continue analysis and collating billing information for attorneys' fee petition portion of motion for final approval; email to co-counsel re same for post 2/18/23 billings;	\$525.00	2.9	\$1,522.50
Legal Services - Standard Rate Robert Thurston – Jan 9, 2024 Continue draft of motion for final approval of settlement; analyze billing rates and bills submitted during settlement and legal analysis for fee petition;	\$525.00	3.7	\$1,942.50
Legal Services - Standard Rate Robert Thurston – Jan 10, 2024 Continued work on drafting motion for final approval of settlement and	\$525.00	2.8	\$1,470.00

<p>Legal Services - Standard Rate Robert Thurston – Jan 10, 2024 Email exchanges with co-Class Counsel re delayed information from State Defendants counsel re out of state Class Members and notification to other states' AG offices and impact on fairness hearing date; legal analysis and input re same;</p>	\$525.00	0.6	\$315.00
<p>Legal Services - Standard Rate Robert Thurston – Jan 12, 2024 Email exchanges and legal analysis re impact of CAFA on Fairness Hearing and State Defendants' late notice re other states having Class Members; legal research and strategy discussions re same with co-Class Counsel;</p>	\$525.00	0.9	\$472.50
<p>Legal Services - Standard Rate Robert Thurston – Jan 12, 2024 Continued legal research, review of fee submission during settlement, and preparation of motion for final approval;</p>	\$525.00	1.3	\$682.50
<p>Legal Services - Standard Rate Robert Thurston – Jan 14, 2024 Email to co-Class Counsel re delay by State in providing out of state Class Members information and legal strategy re same;</p>	\$525.00	0.1	\$52.50
<p>Legal Services - Standard Rate Robert Thurston – Jan 15, 2024 Update website with corrected information from co-Class Counsel;</p>	\$525.00	0.4	\$210.00
<p>Legal Services - Standard Rate Robert Thurston – Jan 15, 2024 Multiple email communications with co-Class Counsel re CAFA legal research and analysis, strategy going forward, and motion for final approval and fairness hearing;</p>	\$525.00	1.1	\$577.50
<p>Legal Services - Standard Rate Robert Thurston – Jan 16, 2024 Email exchanges with co-counsel re status of fee petition and motion for final approval; legal analysis re same;</p>	\$525.00	0.3	\$157.50
<p>Legal Services - Standard Rate Robert Thurston – Jan 16, 2024 Telephone conference with co-Plaintiffs Counsel O'Leary re status of fee petition and motion for final approval; legal analysis and strategy re same;</p>	\$525.00	0.4	\$210.00
<p>Legal Services - Standard Rate Robert Thurston – Jan 17, 2024 Email exchanges with co-Class Counsel re notice to Class and State Defendants compliance;</p>	\$525.00	0.2	\$105.00
<p>Legal Services - Standard Rate Robert Thurston – Jan 18, 2024 Multiple email exchanges with co-Class Counsel re State Defendants missing deadline for Class Notice, State Defendants' counsel's</p>	\$525.00	0.8	\$420.00

Legal Services - Standard Rate Robert Thurston – Jan 22, 2024 Receive and review via ECF letter from State Defendants' counsel to Judge Hillman explaining delays and submitting proposed modified schedule towards final approval of settlement;	\$525.00	0.3	\$157.50
Legal Services - Standard Rate Robert Thurston – Jan 22, 2024 Receive and review email from co-Class Counsel re State Defendants' proposed letter to Judge Hillman and proposed Consent Order with new schedule for Class; legal analysis re same;	\$525.00	0.5	\$262.50
Legal Services - Standard Rate Robert Thurston – Jan 22, 2024 Email exchanges with co-Class Counsel re modified dates due to State Defendants' missed deadlines for CAFA Notice and Notice to Class; legal analysis and strategy re same;	\$525.00	0.5	\$262.50
Legal Services - Standard Rate Robert Thurston – Jan 23, 2024 Multiple email exchanges with State Defendants' counsel and co-Class Counsel re broadcast revised Guidelines and impact on Settlement Agreement and Consent Order, advising the Court, and related legal issues;	\$525.00	1.3	\$682.50
Legal Services - Standard Rate Robert Thurston – Jan 24, 2024 Receive and review via ECF Consent Order signed by Judge Hillman with modified schedule; receive and review email from co-Class Counsel to Named Plaintiffs re same; legal analysis re same;	\$525.00	0.3	\$157.50
Legal Services - Standard Rate Robert Thurston – Jan 24, 2024 Update website with new deadlines; prepare link to Spanish translation version of site; email to co-Class Counsel re same;	\$525.00	0.4	\$210.00
Legal Services - Standard Rate Robert Thurston – Jan 29, 2024 Amend and supplement draft motion for final approval of settlement;	\$525.00	0.5	\$262.50
Legal Services - Standard Rate Robert Thurston – Jan 29, 2024 Multiple email exchanges re proposed email to State Defendants' counsel re Class Notice to be sent 1/29/24 and change in policies re 45 Day Rule and law regarding such changes and requesting documents re same; legal analysis, input and strategy re same;	\$525.00	0.9	\$472.50
Legal Services - Standard Rate Robert Thurston – Jan 30, 2024 Amend and supplement draft motion for final approval of settlement;	\$525.00	0.9	\$472.50
Legal Services - Standard Rate Robert Thurston – Jan 30, 2024 Multiple email exchanges with co-Class Counsel re update on Class	\$525.00	0.6	\$315.00

Notice and request for documents re change in NJDOE policy and guidelines to comply with USDOE demands;

Legal Services - Standard Rate Robert Thurston – Jan 31, 2024 Amend and supplement draft motion for final approval of settlement;	\$525.00	1	\$525.00
-----------------------------------------------------------------------------------------------------------------------------------------	----------	---	----------

Legal Services - Standard Rate Robert Thurston – Jan 31, 2024 Receive and review email from co-Class Counsel to State Defendants' counsel requesting documents relating to NJDOE change in policy and guidelines and citing law re same; legal analysis re same;	\$525.00	0.2	\$105.00
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------	-----	----------

Legal Services - Standard Rate Robert Thurston – Jan 31, 2024 Multiple email exchanges with co-Class Counsel re State Defendants missing 1/29/24 deadline for sending out Class Notice and legal analysis and strategy re response thereto and notifying Judge Hillman;	\$525.00	0.8	\$420.00
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------	-----	----------

Legal Services - Standard Rate Robert Thurston – Jan 31, 2024 Update website with revised Class Notice;	\$525.00	0.4	\$210.00
---------------------------------------------------------------------------------------------------------------	----------	-----	----------

Legal Services - Standard Rate Robert Thurston – Feb 1, 2024 Multiple email exchanges with co-Class Counsel re draft letter to Judge Hillman re State Defendants' failure to send out timely Notice to Class and inability to do so in near future; revise draft letter with legal advice and strategy;	\$525.00	0.4	\$210.00
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------	-----	----------

	Subtotal		15,697.50
	Tax		0.00

	Total		15,697.50
	Amount Paid		0.00

	Amount Due (USD)		\$15,697.50
--	------------------	--	-------------



Thurston Law Offices LLC
 8563355291
 433 River Road #1315
 Highland Park 08904

Billed To	Date of Issue	Invoice Number	Amount Due (USD)
CP Class Action	03/01/2024	0000021	\$11,760.00
	Due Date		
	03/01/2024		

Description	Rate	Qty	Line Total
Legal Services - Standard Rate Robert Thurston – Feb 1, 2024 Multiple email exchange with co-Class Counsel re filing with Court re State Defendants' delay in issuing Notice and other related issues; legal analysis and advice re same; receive and review via ECF letter to Judge Hillman re delays; subsequent emails from State Defendants' counsel and court re hearing scheduled on delays;	\$525.00	1.6	\$840.00
Legal Services - Standard Rate Robert Thurston – Feb 1, 2024 Amend and supplement draft motion for final approval of settlement and supporting documents; perform calculations of billings since 2/18; multiple email exchanges with co-Class Counsel re same;	\$525.00	4.6	\$2,415.00
Legal Services - Standard Rate Robert Thurston – Feb 2, 2024 Receive and review via ECF signed Consent Order by Judge Hillman, amending schedule and changing time of Fairness Hearing for 4/11; legal analysis re same;	\$525.00	0.2	\$105.00
Legal Services - Standard Rate Robert Thurston – Feb 2, 2024 Receive and review via ECF letter from State Defendants' counsel to Judge Hillman re delays in Notice and proposed consent order amending schedule and Notice provisions; legal analysis re same;	\$525.00	0.4	\$210.00
Legal Services - Standard Rate Robert Thurston – Feb 2, 2024 Multiple emails re State Defendants' delay in notice, hearing set for 2/6, and related issues; legal analysis re same;	\$525.00	1.2	\$630.00
Legal Services - Standard Rate	\$525.00	0.4	\$210.00

Robert Thurston – Feb 6, 2024
 Email exchanges with co-Class Counsel re inquiry from named
 16861
 plaintiffs re notice and status of case; legal analysis re response
 thereto;

Legal Services - Standard Rate	\$525.00	0.7	\$367.50
--------------------------------	----------	-----	----------

Robert Thurston – Feb 7, 2024
 Email exchanges with co-Class Counsel re NJDOE guidance broadcast
 on clarification to special education case timeline and procedures; legal
 analysis re same;

Legal Services - Standard Rate	\$525.00	0.4	\$210.00
--------------------------------	----------	-----	----------

Robert Thurston – Feb 14, 2024
 Multiple email exchanges re Notice of Settlement and State
 Defendants' compliance;

Legal Services - Standard Rate	\$525.00	0.8	\$420.00
--------------------------------	----------	-----	----------

Robert Thurston – Feb 15, 2024
 Multiple email exchanges with co-Class Counsel re issue of State delay
 in getting email notice to NJ special ed counsel, approaching Judge
 Hillman with issue, and impact on schedule;

Legal Services - Standard Rate	\$525.00	0.2	\$105.00
--------------------------------	----------	-----	----------

Robert Thurston – Feb 15, 2024
 Receive and review via ECF letter from co-Class Counsel to Judge
 Hillman re delay in sending Notice to counsel via email;

Legal Services - Standard Rate	\$525.00	0.4	\$210.00
--------------------------------	----------	-----	----------

Robert Thurston – Feb 16, 2024
 Multiple email exchanges with co-Class Counsel re responses to
 Notice and JRA email re Notice and representations of clients;

Legal Services - Standard Rate	\$525.00	0.3	\$157.50
--------------------------------	----------	-----	----------

Robert Thurston – Feb 16, 2024
 Email exchanges with co-Class Counsel re handling incoming form
 submissions from website re potential clients;

Legal Services - Standard Rate	\$525.00	0.4	\$210.00
--------------------------------	----------	-----	----------

Robert Thurston – Feb 16, 2024
 Amend and supplement website with new dates and confirmation that
 Notice has been sent;

Legal Services - Standard Rate	\$525.00	1.6	\$840.00
--------------------------------	----------	-----	----------

Robert Thurston – Feb 17, 2024
 Multiple emails and Zoom conference with co-Class Counsel re
 preparation for Fairness Hearing 4/11 and responding to
 inquiries/objections via website;

Legal Services - Standard Rate	\$525.00	0.4	\$210.00
--------------------------------	----------	-----	----------

Robert Thurston – Feb 19, 2024
 Update website with corrections to text and FAQ;

Legal Services - Standard Rate	\$525.00	0.9	\$472.50
--------------------------------	----------	-----	----------

Robert Thurston – Feb 19, 2024
 Multiple email exchanges with co-Class Counsel re JRA notice of
 settlement and inquiries via website and legal strategy responding to
 same;

Legal Services - Standard Rate Robert Thurston – Feb 20, 2024 Multiple email exchanges with co-Class Counsel re responses to Notice of Settlement, questions raised by class members via website, and objection by Jamie Epstein and legal advice/strategy re same;	\$525.00	1.5	\$787.50
Legal Services - Standard Rate Robert Thurston – Feb 21, 2024 Multiple email exchanges re updated information for Notice and website, questions from class members, problem with Spanish-speaking class members, and addressing issues;	\$525.00	1.3	\$682.50
Legal Services - Standard Rate Robert Thurston – Feb 21, 2024 Prepare for and participate in Zoom conference with co-Class Counsel re preparation for 4/11 Fairness Hearing and responding to inquiries or objections;	\$525.00	1.2	\$630.00
Legal Services - Standard Rate Robert Thurston – Feb 21, 2024 Multiple email exchanges and legal strategy discussion with co-Class Counsel re handling objections (if any), responding to inquiries from class members, and preparing for 4/11 fairness hearing;	\$525.00	1.1	\$577.50
Legal Services - Standard Rate Robert Thurston – Feb 22, 2024 Receive and review via email from co-Class Counsel updated FAQs for website and information regarding Notice in Spanish and additions; update website and respond to related issues;	\$525.00	0.8	\$420.00
Legal Services - Standard Rate Robert Thurston – Feb 27, 2024 Receive and review email from co-Class Counsel re motion to approve compliance monitor; prepare draft joint motion and order to approve compliance monitor and email to counsel for review;	\$525.00	0.6	\$315.00
Legal Services - Standard Rate Robert Thurston – Feb 29, 2024 Multiple email exchanges re issues in motion for final approval, including stipulated hourly rates, responses to objections and other emails from class members, and other issues;	\$525.00	1.4	\$735.00

Subtotal	11,760.00
Tax	0.00
Total	11,760.00
Amount Paid	0.00
Amount Due (USD)	\$11,760.00