

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

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

Civil Action No. 19-cv-12807

v.

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

Defendants.

**DECLARATION OF DENISE LANCHANTIN DWYER
IN SUPPORT OF MOTION FOR FINAL APPROVAL OF SETTLEMENT
AGREEMENT AND ATTORNEYS' FEES**

I, Denise Lanchantin Dwyer, hereby declare:

1. I am an attorney at law, admitted to practice in the State of New York since 1985, and the State of New Jersey since 2005. I am a member of the bar of this

Court, the United States Court of Appeals for the Third Circuit, and of the United States District Courts for the Eastern and Southern Districts of New York. I am co-Class Counsel in this matter.

2. I make this declaration upon my personal knowledge in support of my application for attorneys' fees. If called to testify, I could testify competently to the facts set forth in this declaration.

3. I earned an A.B. from Fordham College, Fordham University, in the Bronx, New York in 1980, and a J.D. from New York Law School's evening division in New York City in 1984. While in law school, I worked full-time as a law clerk for an admiralty and maritime firm in New York City. I was also a student law clerk for a semester for the Honorable John E. Sprizzo in the U.S. District Court, for the Southern District of New York.

4. I am an experienced trial attorney having started my career as an Assistant District Attorney in Kings County, Brooklyn, New York, leaving as a supervisor, and then moving to civil trial work. I have been practicing law for more than 39 years. I have litigated cases and obtained successful results in New Jersey at the administrative level, federal district and appellate levels, U.S. Department of Education's Office for Civil Rights, and New Jersey's Division on Civil Rights.

5. I have maintained a solo practice in education law in Princeton, New Jersey since 2006, representing individuals and families of students with disabilities,

as well general education students in disciplinary matters from preschool through graduate school. I regularly represent clients in mediations and due process hearings conducted by the New Jersey Department of Education, hearings at the Office of Administrative Law, and appeals to the U.S. District Court and the Third Circuit Court of Appeals.

6. I also act as a consultant to the Education Law Center (ELC) in their Student Rights Project and am of counsel to other special education firms on complex cases.

7. I have given numerous presentations on special education law and advocacy topics, and for the past four years have presented the case law review at the New Jersey Institute for Continuing Legal Education's annual Hot Topics in Special Education seminar.

8. I am a member of the New Jersey Bar Association's School Law Committee and regularly attend their meetings. I am an active member of the New Jersey Special Education Practitioners, an association of attorneys and other advocates who represent parents and students in the area of special education. I also mentor attorneys working *pro bono* in special education cases for Volunteer Lawyers for Justice.

9. I am familiar with the fees charged by parents' counsel in special education civil rights and disability matters in New Jersey and with the Community

Legal Services (CLS) range, available at <https://clsphila.org/about-community-legal-services/attorney-fees/>. As described more fully in the declaration of Catherine Merino Reisman in support of the Classes' Unopposed Motion for Final Approval of Settlement Agreement and Attorneys' Fees, my time in this matter is billed at an hourly rate of \$610, which is well below the CLS range of \$735-850 for an attorney of my experience.

10. During the litigation of this matter, I recorded the time I spent working on the case using legal timekeeping and billing software. A bill reflecting time I spent on the case through February 2, 2023 is attached hereto as Exhibit 1. That bill is an understatement of the actual time spent due to data loss from my billing software. The bill shows a total of 331.6 hours spent through that date for a total of \$202,276.00 at the hourly rate of \$610.00.

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

Executed on March 9, 2024

/s/ Denise Lanchantin Dwyer
Denise Lanchantin Dwyer

Exhibit 1



Law Office of Denise Lanchantin Dwyer LLC

Invoice No.: 652

March 9, 2024

NJ 45-day case

RE: C.P. et al., v. NJDOE et al., 1:19-cv-12807 (NLH-MJS)

Professional Fees

Date	Description	Hours	Rate	Fee
04/25/2019	Email correspondence with J. Rue re: arranging meeting with potential co-counsel for possible class-action suit.	0.10	\$610.00	\$61.00
04/30/2019	Meeting with J. Rue in-person and C. Reisman and D. Giles by telephone re: proposed class-action suit including strategy and steering committee.	1.50	\$610.00	\$915.00
04/30/2019	Review email correspondence from J. Rue to potential steering committee re: participation.	0.10	\$610.00	\$61.00
05/01/2019	Review draft class action complaint.	0.50	\$610.00	\$305.00
05/01/2019	Review/analyze proposed joint prosecution agreement.	0.30	\$610.00	\$183.00
05/02/2019	Review email from co-counsel re: issues for revising complaint.	0.10	\$610.00	\$61.00
05/08/2019	Conference call with co-counsel re: potential class-action.	0.30	\$610.00	\$183.00
05/08/2019	Email to co-counsel with record received via OPRA re: NJDOE's proposed changes to dispute resolution process.	0.20	\$610.00	\$122.00
05/20/2019	Review/analyze documents received via FOIA request including US DOE's finding NJDOE non-compliant on 45-day rule; forward to co-counsel and email correspondence re: same.	2.40	\$610.00	\$1,464.00
05/21/2019	Review and propose revisions to draft complaint.	0.60	\$610.00	\$366.00
05/21/2019	Teleconference with co-counsel re: filing complaint and next steps.	0.50	\$610.00	\$305.00
05/28/2019	Review/analyze co-counsel's proposed revisions to joint prosecution agreement and emails re: same.	0.30	\$610.00	\$183.00
06/04/2019	Review/analyze revised joint prosecution agreement.	0.30	\$610.00	\$183.00

06/04/2019	Review co-counsel's email correspondence to DAGs re: preliminary issues in case.	0.10	\$610.00	\$61.00
06/06/2019	Email correspondence with co-counsel re: records received via OPRA re: NJDOE's proposed changes to dispute resolution process.	0.20	\$610.00	\$122.00
06/07/2019	Email correspondence with co-counsel re: confirming group connectivity.	0.10	\$610.00	\$61.00
06/17/2019	Email correspondence with co-counsel re: OPRA records requested and received on NJDOE's proposed changes to dispute resolution process.	0.30	\$610.00	\$183.00
06/19/2019	Email correspondence with co-counsel re: additional records to request via OPRA on NJDOE's proposed changes to dispute resolution process; options for pursuing records not yet produced; and language for same.	0.50	\$610.00	\$305.00
06/24/2019	Review draft letter to NJDOE Commissioner re: OPRA records not yet produced.	0.10	\$610.00	\$61.00
07/08/2019	Email correspondence with co-counsel re: cases with related issues; and potential additional plaintiffs.	0.20	\$610.00	\$122.00
07/08/2019	Prepare and file notice of appearance via ECF 12.	0.10	\$610.00	\$61.00
07/10/2019	Conference call with case steering committee.	0.90	\$610.00	\$549.00
07/11/2019	Email correspondence with co-counsel re: status of matter and options for next steps including motion practice.	0.20	\$610.00	\$122.00
07/12/2019	Email correspondence with co-counsel re: timing of sending OPRA requests.	0.10	\$610.00	\$61.00
07/15/2019	Review/analyze proposed revisions to joint fee agreement.	0.20	\$610.00	\$122.00
07/15/2019	Review/analyze co-counsel's email correspondence with DAGs re: preliminary procedural issues; and proposed consent order consolidating related cases.	0.30	\$610.00	\$183.00
07/22/2019	Email correspondence with co-counsel re: upcoming bar association meeting with NJDOE leaders presenting on Update on Special Education Policy and Dispute Resolution.	0.10	\$610.00	\$61.00
07/29/2019	Review co-counsel's email correspondence with DAG re: his call with DAG on consent order and other issues; and email correspondence re: additional OPRA requests.	0.20	\$610.00	\$122.00

07/30/2019	Review email correspondence with co-counsel re: coordination of cases.	0.10	\$610.00	\$61.00
08/01/2019	Email correspondence with co-counsel re: letter to DAG with copy of letter to NJDOE Commissioner on improper failure to produce records under OPRA.	0.20	\$610.00	\$122.00
08/02/2019	Email correspondence with co-counsel re: following up on OPRA requests.	0.10	\$610.00	\$61.00
08/05/2019	Review Ds' motion to dismiss received via ECF 19 notice; and email correspondence with co-counsel re: same.	1.00	\$610.00	\$610.00
08/06/2019	Review/analyze corrective action documents NJDOE posted on their website and forward same to co-counsel with comments.	0.40	\$610.00	\$244.00
08/06/2019	Review notice of deadlines for motion received via ECF and letter requesting extension of time ECF 20.	0.10	\$610.00	\$61.00
08/07/2019	Email correspondence with co-counsel re: effect on case of NJDOE's proposed corrective actions.	0.20	\$610.00	\$122.00
08/08/2019	Email correspondence from co-counsel re: potential amici curiae.	0.10	\$610.00	\$61.00
08/13/2019	Review email correspondence with co-counsel re: issues for planned conference call.	0.10	\$610.00	\$61.00
08/14/2019	Email correspondence with co-counsel re: unresponsive reply from NJDOE on OPRA request for records on USDOE's on-site visit.	0.10	\$610.00	\$61.00
08/22/2019	Email correspondence with co-counsel re: additional potential plaintiffs.	0.10	\$610.00	\$61.00
08/23/2019	Conference call with co-counsel re: status and next steps.	0.80	\$610.00	\$488.00
08/23/2019	Review revised drafts of first amended complaint and email correspondence with co-counsel re: same including legal issues.	1.20	\$610.00	\$732.00
08/26/2019	Review filed amended complaint received via ECF 21; and ECF 22 letter to Court re: Ds' 12(b)(6) motion.	1.00	\$610.00	\$610.00
08/28/2019	Email correspondence to co-counsel re: presentation by NJDOE leaders on Update on Special Education Policy and Dispute Resolution at bar association committee meeting.	0.20	\$610.00	\$122.00
08/29/2019	Forward NJDOE's RFQ for proposed pilot program for IHOs; and email correspondence with co-counsel re: same.	0.20	\$610.00	\$122.00

09/06/2019	Review Ds' request for extension of time to reply to amended complaint received via ECF 23 and clerk's text order reply.	0.10	\$610.00	\$61.00
09/18/2019	Review Ds' letter to MJ requesting extension of time to reply to amended complaint received via ECF 24.	0.10	\$610.00	\$61.00
09/20/2019	Review MJ's order granting Ds' request for extension of time to reply to amended complaint received via ECF 25.	0.10	\$610.00	\$61.00
10/07/2019	Review, sign, and return joint fee agreement.	0.20	\$610.00	\$122.00
10/09/2019	Email correspondence with co-counsel re: status and plans for next steps.	0.10	\$610.00	\$61.00
10/10/2019	Review D's letter to MJ re: correcting due date for reply to amended complaint and MJ's order re: same received via ECF 26 and ECF 27.	0.10	\$610.00	\$61.00
10/10/2019	Email correspondence with co-counsel re: planned motions and timing.	0.10	\$610.00	\$61.00
10/10/2019	Review Joint Prosecution Agreement executed by Ps' firms and some amici.	0.20	\$610.00	\$122.00
10/16/2019	Review and draft briefs in support of preliminary injunction and for class certification.	1.00	\$610.00	\$610.00
10/16/2019	Review Ds' motion to dismiss amended complaint received via ECF 28, and clerk's notice of return date.	1.00	\$610.00	\$610.00
10/17/2019	Email correspondence with co-counsel re: draft motions for preliminary injunction and class certification; and Ds' motion to dismiss amended complaint.	0.70	\$610.00	\$427.00
10/17/2019	Teleconference with co-counsel re: PI motion.	0.50	\$610.00	\$305.00
10/22/2019	Email correspondence from co-counsel re: Rutgers Education Clinic will be amicus.	0.10	\$610.00	\$61.00
10/23/2019	Prepare summary of capabilities for class certification motion and forward to co-counsel with CV.	0.30	\$610.00	\$183.00
10/25/2019	Review and revise draft certification for preliminary injunction and class certification motions and send to co-counsel for filing.	0.20	\$610.00	\$122.00
10/25/2019	Email correspondence with co-counsel re: finalize summary of capabilities for filing with class certification motion.	0.10	\$610.00	\$61.00
10/28/2019	Review J. Rosen Valverde's amicus letter and email correspondence with co-counsel re: same.	0.20	\$610.00	\$122.00

10/29/2019	Review co-counsel's letter to court re: class certification and PI motions and Ds' MTD; and amicus filing ECF 35.	0.30	\$610.00	\$183.00
10/31/2019	Extended email correspondence with co-counsel re: pending motions and responses to NJDOE's RFQ for IHOs as part of USDOE's corrective action plan.	0.40	\$610.00	\$244.00
11/13/2019	Review order granting amici leave to appear.	0.10	\$610.00	\$61.00
11/21/2019	Review revised letter reply brief on class certification.	0.40	\$610.00	\$244.00
11/22/2019	Review revised letter reply brief on PI motion; and telephone conversation with co-counsel re: same.	0.50	\$610.00	\$305.00
12/05/2019	Email correspondence with co-counsel re: bill pending in NJ legislature to create a special education unit in the OAL.	0.20	\$610.00	\$122.00
12/10/2019	Review text order re: motion briefing schedule received via ECF 58 notice.	0.10	\$610.00	\$61.00
12/13/2019	Review D's letter brief in opposition for amici to appear received via ECF 59 notice.	0.20	\$610.00	\$122.00
12/16/2019	Review Ps' letter opposing Ds' request for adjournment received via ECF 60 notice.	0.10	\$610.00	\$61.00
01/20/2020	Review analyze NJDOE's broadcast memo on Enhancements to the Special Education Dispute Resolution System; and extensive email correspondence with co-counsel re: same.	0.80	\$610.00	\$488.00
01/21/2020	Telephone conference with co-counsel re: NJDOE's proposed Due Process Hearing Guidelines and possible responses to same; email correspondence with SPAN re: they were not notified; and email correspondence with co-counsel re: same.	1.10	\$610.00	\$671.00
01/22/2020	Email correspondence with co-counsel re: seeking TRO on NJDOE's proposed Due Process Hearing Guidelines.	0.20	\$610.00	\$122.00
01/23/2020	Review co-counsel's letter to DAG re: planned implementation of NJDOE's proposed Due Process Hearing Guidelines.	0.10	\$610.00	\$61.00
01/24/2020	Review co-counsel's letter to DJ re: NJDOE's proposed Due Process Hearing Guidelines; and email correspondence with colleagues re: planned comments.	0.30	\$610.00	\$183.00
01/28/2020	Review text order re: addressing NJDOE's proposed Due Process Hearing Guidelines; received via ECF notice 68; review DAG's response to Ps' letter re: same; and	0.90	\$610.00	\$549.00

	extensive email correspondence with co-counsel re: responding to same.			
01/29/2020	Email correspondence with co-counsel re: forwarding copy of PI motion and TRO to USDOE; review and propose revisions to draft letter re: same; and review co-counsel's submitted public comment re: NJDOE's proposed Due Process Hearing Guidelines.	1.10	\$610.00	\$671.00
01/30/2020	Receive and review NJDOE's OPRA response that the Memorandum of Agreement with OAL they told US DOE was executed was not and email correspondence with co-counsel re: same.	0.20	\$610.00	\$122.00
01/31/2020	Email correspondence with co-counsel re: sending NJDOE's admission that MOA not signed to US DOE.	0.10	\$610.00	\$61.00
02/02/2020	Conference call with co-counsel re: arguments on second motion for preliminary injunction due March 6.	0.90	\$610.00	\$549.00
02/11/2020	Review Defendants' brief in opposition to second motion for preliminary injunction.	0.20	\$610.00	\$122.00
02/18/2020	Court appearance for oral argument on motion for preliminary injunction and Defendants' motion to dismiss (4.5); and travel to Camden courthouse (1.5).	6.00	\$610.00	\$3,660.00
02/26/2020	Review draft of second amended complaint, make proposed revisions and send to co-counsel.	1.00	\$610.00	\$610.00
02/26/2020	Review final version of supplemental brief on pending motions filed via ECF.	0.20	\$610.00	\$122.00
02/27/2020	Electronic Case Filing notice from federal court re: directing response from Defendants on status of proposed guidelines by noon February 28.	0.10	\$610.00	\$61.00
02/28/2020	Electronic Case Filing notice from federal court re: adjourning March 2nd hearing date and setting briefing schedule.	0.10	\$610.00	\$61.00
02/28/2020	Review letter from DAG re: status of proposed guidelines received via Electronic Case Filing notice from federal court.	0.10	\$610.00	\$61.00
03/02/2020	Email correspondence with SSEAC members, SPAN and other participants in 45-day rule advocacy for information for certification re: consultation by NJDOE on proposed guidelines, and email correspondence with co-counsel re: same.	0.40	\$610.00	\$244.00

03/02/2020	Legal research on prior monitoring of NJDOE and forwarding to co-counsel 2016 complaint investigation report re: NJDOE's delegation of responsibility for 45-day rule to OAL.	0.50	\$610.00	\$305.00
03/03/2020	Draft summary of School Law Committee meetings and other 45-day rule advocacy efforts for certification.	0.30	\$610.00	\$183.00
03/04/2020	Revise draft certification for OSC on PI.	0.50	\$610.00	\$305.00
03/04/2020	Review summaries of 45-day rule advocacy prepared by E. Athos and R. Spar and forward to co-counsel, and email correspondence with co-counsel re: same.	0.30	\$610.00	\$183.00
03/05/2020	Email correspondence with co-counsel re: D. Rota's cert in OPRA suit. See TJO pro forma	0.00	\$610.00	
03/17/2020	Email correspondence with co-counsel re: NJDOE's OPRA response. See TJO pro forma.	0.00	\$610.00	
04/27/2020	Review Defendants' letter reply brief to Plaintiffs' opposition to motion to dismiss second amended complaint, and decision in J.A. v. Monroe Twp. BOE.	0.40	\$610.00	\$244.00
05/22/2020	Review opinion and order on defendant's motion to dismiss.	0.50	\$610.00	\$305.00
05/26/2020	Electronic Case Filing notice from federal court re: directing parties to confer and advise about accelerated trial.	0.10	\$610.00	\$61.00
05/26/2020	Conference call with co-counsel re: response to text order.	1.00	\$610.00	\$610.00
05/27/2020	Email correspondence with co-counsel re: NJDOE's response to OPRA request for comments on proposed guidelines for due process hearings. See TJO pro forma.	0.00	\$610.00	
06/29/2020	Review Defendants' reply ECF-121 to letter from amici ECF-116.	0.10	\$610.00	\$61.00
06/30/2020	Review Plaintiffs' filed brief replying to Defendants' opposition to renewed motion for class certification.	0.20	\$610.00	\$122.00
06/30/2020	Review ECF-123 Defendants' letter re: adjournment request and expedited discovery and trial.	0.10	\$610.00	\$61.00
07/02/2020	Review ECF 128, Defendants' response to OSC on consolidation of C.P. case with J.A. case; and ECF 126, Plaintiffs' letter to Court re: consolidation.	0.60	\$610.00	\$366.00
07/07/2020	Video conference with co-counsel re: legal issues to add if filing new class action complaint.	1.00	\$610.00	\$610.00

11/24/2020	Review opinion & order on consolidation, discovery, and denying class certification without prejudice.	0.20	\$610.00	\$122.00
12/02/2020	Review Ps' letter re: Rule 16 conference received via ECF 142.	0.10	\$610.00	\$61.00
12/02/2020	Review text order re: Rule 16 conference received via ECF 143.	0.10	\$610.00	\$61.00
12/12/2020	Conference call with co-counsel re: joint discovery plan and upcoming Rule 16 conference.	1.70	\$610.00	\$1,037.00
12/14/2020	Review revised discovery plan and draft confidentiality order; email correspondence with co-counsel re: bifurcation; and review email correspondence between lead Plaintiffs' counsel and Defendants' counsel with attached proposed revisions to documents.	0.40	\$610.00	\$244.00
12/15/2020	Email correspondence with co-counsel re: delays issuing decisions in special education cases will not be discussed at this week's Administrative Law Forum CLE during session on trying due process cases at the OAL.	0.10	\$610.00	\$61.00
12/15/2020	Email correspondence with co-counsel re: NJDOE's position on settlement conferences at the OAL, their persistent use of "federal days"; and whether the OAL is a third-party.	0.30	\$610.00	\$183.00
12/15/2020	Review Defendants' revisions to discovery plan.	0.10	\$610.00	\$61.00
12/16/2020	Legal research on statutory responsibilities of chief ALJ and documents agencies required to submit to OAL for contested cases.	0.40	\$610.00	\$244.00
12/16/2020	Review finalized joint discovery plan received by Court.	0.10	\$610.00	\$61.00
12/17/2020	Review outline of points for Rule 16 conference and final joint discovery plan.	0.20	\$610.00	\$122.00
12/17/2020	Rule 16 conference via telephone.	1.00	\$610.00	\$610.00
12/17/2020	Conference call with co-counsel following Rule 16 conference to discuss next steps.	0.50	\$610.00	\$305.00
12/21/2020	Email correspondence with co-counsel with proposed consent order and cover letter.	0.20	\$610.00	\$122.00
12/22/2020	Review comments and revisions proposed by co-counsel to consent order.	0.20	\$610.00	\$122.00
12/22/2020	Continued email correspondence with co-counsel re: revisions to consent order, etc.	0.20	\$610.00	\$122.00

12/23/2020	Review final version of consent order and letter sent to Defendants' counsel.	0.10	\$610.00	\$61.00
12/30/2020	Review Defendants' FRCP 26 disclosure.	0.20	\$610.00	\$122.00
12/31/2020	Review draft discovery demands and make notes for proposed revisions.	0.40	\$610.00	\$244.00
01/02/2021	Email correspondence with co-counsel re: NJDOE's disclosures.	0.10	\$610.00	\$61.00
01/04/2021	Review and propose edits to J. Rue's revisions to draft discovery requests.	0.90	\$610.00	\$549.00
01/04/2021	Email correspondence with colleagues re: documentary agreements between NJDOE and OAL.	0.10	\$610.00	\$61.00
01/05/2021	Videoconference with co-counsel re: viability of consolidating new cases with current one for discovery purposes.	1.00	\$610.00	\$610.00
01/05/2021	Teleconference with T. O'Leary re: discovery requests.	0.40	\$610.00	\$244.00
01/08/2021	Email correspondence with co-counsel re: recent DNJ special education decision.	0.40	\$610.00	\$244.00
01/11/2021	Review email correspondence with co-counsel re: consolidation and recent DNJ special education decision.	0.20	\$610.00	\$122.00
01/13/2021	Review signed consent discovery confidentiality order and MJ's order re: same received via ECF 145 and ECF 146.	0.20	\$610.00	\$122.00
01/13/2021	Telephone call with co-counsel re: Defendants; discovery demands.	0.40	\$610.00	\$244.00
01/13/2021	Review Defendants' discovery demands.	0.40	\$610.00	\$244.00
01/14/2021	Videoconference with co-counsel re: replying to defendants' discovery requests.	0.80	\$610.00	\$488.00
01/18/2021	Review email correspondence with co-counsel re: responses to Defendants' discovery demands.	0.30	\$610.00	\$183.00
01/19/2021	Email correspondence with co-counsel re: revisions to responses to Defendants' discovery demands.	0.50	\$610.00	\$305.00
01/20/2021	Review email correspondence with co-counsel re: discovery responses to Defendants.	0.10	\$610.00	\$61.00
01/28/2021	Review updated response to interrogatories.	0.30	\$610.00	\$183.00
02/12/2021	Email correspondence from co-counsel re: DAGs' request we not speak to identified NJDOE witnesses even in connection with unrelated cases.	0.10	\$610.00	\$61.00
02/12/2021	Review co-counsel's email and letter to DAG re: Defendants' request for settlement demand.	0.20	\$610.00	\$122.00

02/12/2021	Email correspondence with co-counsel re: specific items in Defendants' document production.	0.20	\$610.00	\$122.00
02/15/2021	Review co-counsel's email correspondence re: items in Defendants' discovery responses.	0.10	\$610.00	\$61.00
02/16/2021	Review co-counsel's email correspondence with DAG re: discovery issues and issues for potential settlement.	0.20	\$610.00	\$122.00
02/17/2021	Review draft discovery deficiency letter and make proposed changes.	0.40	\$610.00	\$244.00
02/18/2021	Review letter from DAG re: privilege log and continuing disclosure.	0.10	\$610.00	\$61.00
02/18/2021	Telephone conversation with T. O'Leary re: comments on discovery documents.	0.70	\$610.00	\$427.00
02/19/2021	Review documents produced by Defendants re: costs of ALJ training, charts of cases received and resolved, and federal IDEA funding received by state; and email correspondence with co-counsel re: issuing subpoena to OAL.	0.30	\$610.00	\$183.00
02/24/2021	Prepare summary of OPRA'd documents and pertinence to depositions and send to co-counsel.	1.00	\$610.00	\$610.00
02/25/2021	Review Defendants' document production.	1.50	\$610.00	\$915.00
03/01/2021	Telephone conversation with co-counsel re: documents for C. Anthony deposition.	0.50	\$610.00	\$305.00
03/04/2021	Review draft letter to MJ Williams re: discovery issues and comments of co-counsel.	0.20	\$610.00	\$122.00
03/05/2021	Telephone conversation with co-counsel re: upcoming deposition.	0.30	\$610.00	\$183.00
03/05/2021	Electronic Case Filing notice from federal court with letter to MJ re: discovery issues; and review exhibits in preparation for upcoming deposition.	0.40	\$610.00	\$244.00
03/05/2021	Review potential exhibits for upcoming depositions.	1.00	\$610.00	\$610.00
03/05/2021	Telephone conversation with T. O'Leary re: C. Anthony's upcoming deposition.	0.50	\$610.00	\$305.00
03/08/2021	Electronic Case Filing notice from federal court re: Defendants' response to Plaintiffs' letter to MJ about discovery issues.	0.10	\$610.00	\$61.00
03/08/2021	Review and comment on outline for C. Anthony deposition on March 10, 2021.	0.80	\$610.00	\$488.00
03/08/2021	Review OSEP's case processing manual in preparation for C. Anthony deposition.	0.70	\$610.00	\$427.00
03/09/2021	Review legislative fiscal estimate with admissions from NJDOE and proposed	0.20	\$610.00	\$122.00

	letter re: same and email correspondence with co-counsel.			
03/10/2021	Attend and support deposition of Catherine Anthony.	5.50	\$610.00	\$3,355.00
03/10/2021	Review and propose edits on letter to DAG seeking additional documents.	0.10	\$610.00	\$61.00
03/12/2021	Telephone conference with MJ re: discovery issues.	1.30	\$610.00	\$793.00
03/12/2021	Video conference with co-counsel re: discovery conference with MJ.	0.40	\$610.00	\$244.00
03/16/2021	Electronic Case Filing notice from federal court with due dates for motion on deliberative process issue.	0.10	\$610.00	\$61.00
05/04/2021	Email correspondence from co-counsel re: NJDOE's discovery production.	0.10	\$610.00	\$61.00
05/07/2021	Review OAL's response to subpoena.	0.40	\$610.00	\$244.00
05/07/2021	Review NJDOE's additional discovery production.	0.20	\$610.00	\$122.00
05/10/2021	Review NJDOE's corrected discovery production and privilege log; and email correspondence with co-counsel re: same and other discovery issues.	0.30	\$610.00	\$183.00
05/11/2021	Email correspondence with co-counsel re: discovery production.	0.10	\$610.00	\$61.00
05/12/2021	Review additional discovery production from OAL (0.3); and telephone call with co-counsel re: NJDOE's arguments re: same records in OPRA litigation. (0.6).	0.90	\$610.00	\$549.00
05/14/2021	Review co-counsel's letters to DAG re: inadequacies in OAL's response to subpoenas; and email with co-counsel re: NJDOE's argument in recent DNJ case on OAL delays.	0.30	\$610.00	\$183.00
05/14/2021	Review and comment on co-counsel's letter to DAG re: NJDOE discovery issues.	0.10	\$610.00	\$61.00
05/18/2021	Review subpoena to Office of Legislative Services.	0.10	\$610.00	\$61.00
05/21/2021	Email correspondence with co-counsel re: inability to obtain transcripts of OAL hearings in a reasonable time.	0.20	\$610.00	\$122.00
05/25/2021	Review email correspondence among co-counsel re: ESI stipulation, and various discovery responses.	0.20	\$610.00	\$122.00
05/25/2021	Review email correspondence among co-counsel re: options for settlement.	0.20	\$610.00	\$122.00
05/26/2021	Review subpoenas and notices of subpoenas served on OAL; and co-counsel's letters to DAGs re: various discovery issues.	0.20	\$610.00	\$122.00

05/26/2021	Telephone conversation with T. O'Leary re: NJDOE's claim in OPRA suit that "executed" agreement was still in deliberative process.	0.50	\$610.00	\$305.00
06/07/2021	Review email correspondence from co-counsel with OAL's new deliberative privilege assertion.	0.30	\$610.00	\$183.00
06/09/2021	Review co-counsel's follow-up letter to NJDOE DAG re: discovery.	0.10	\$610.00	\$61.00
06/17/2021	Review email correspondence from co-counsel with ESI protocol and reply from OAL DAG re: discovery issues.	0.10	\$610.00	\$61.00
06/25/2021	Review notice of scheduled trial and pretrial logistics conference dates received via ECF notice and email correspondence with co-counsel re: same.	0.10	\$610.00	\$61.00
06/28/2021	Zoom conference with co-counsel re: preparations for trial date just issued.	1.00	\$610.00	\$610.00
06/28/2021	Revise proposed Schedule A attachment to FRCP 30(b)(6) deposition notice to OAL and co-counsel's letter to MJ.	0.30	\$610.00	\$183.00
06/29/2021	Review multiple email exchanges between co-counsel and DAGs for both NJDOE and OAL with subpoenas for 30(b)(6) depositions and other discovery matters.	0.40	\$610.00	\$244.00
06/30/2021	Review correspondence from DAG received via email replying to letter filed on docket re: discovery; review co-counsel's proposed response and comments from other co-counsel re: discovery issues.	0.30	\$610.00	\$183.00
06/30/2021	Email correspondence with co-counsel re: order of depositions and dates.	0.20	\$610.00	\$122.00
06/30/2021	Review co-counsel's email correspondence with OAL DAG re: discovery compliance.	0.10	\$610.00	\$61.00
06/30/2021	Review email correspondence from co-counsel with proposed requests for admission.	0.30	\$610.00	\$183.00
07/02/2021	Review text order received via ECF notice directing filing letter re: length of trial; and telephone conversation with lead counsel re: same.	0.30	\$610.00	\$183.00
07/06/2021	Email correspondence with co-counsel re: depositions of Worthington and Sanders, and telephone call with lead counsel re: same.	0.30	\$610.00	\$183.00
07/06/2021	Review OAL whitepaper, correspondence re: same, and documents in preparation for deposition of ALJ Sanders.	4.20	\$610.00	\$2,562.00

07/06/2021	Review co-counsel's letter to MJ re: discovery issues received via ECF 164.	0.10	\$610.00	\$61.00
07/06/2021	Review email correspondence with co-counsel re: issues for deposing retired NJDOE manager.	0.20	\$610.00	\$122.00
07/07/2021	Review NJSEP report and follow up letter for use in Sanders and Worthington depositions; and email correspondence with co-counsel re: same and re: other deposition issues.	0.70	\$610.00	\$427.00
07/07/2021	Review letter re: length of trial received via ECF 166.	0.10	\$610.00	\$61.00
07/07/2021	Review DAG's letter re: length of trial received via ECF 169.	0.10	\$610.00	\$61.00
07/08/2021	Telephone conversation with co-counsel re: DAG will not accept service of subpoena for ALJ Sanders, confirm date and time of deposition, and review subpoena sent out for service.	0.20	\$610.00	\$122.00
07/09/2021	Review letter from DAG received via ECF 167 requesting postponement of July 15 conference with MJ; co-counsel's response ECF 168' and DAG's reply ECF 170.	0.20	\$610.00	\$122.00
07/09/2021	Email correspondence with co-counsel re: FRCP 30(b)(6) and 45 subpoenas, and documents owed by OAL.	0.30	\$610.00	\$183.00
07/12/2021	Email correspondence with co-counsel re: documentation of ALJ training.	0.20	\$610.00	\$122.00
07/12/2021	Review letter from DAG re: representing J. Worthington at deposition and email correspondence with co-counsel re: same.	0.10	\$610.00	\$61.00
07/13/2021	ECF notice that status conference on July 15th adjourned to July 21st, and review email correspondence among counsel re: deposition dates.	0.10	\$610.00	\$61.00
07/13/2021	Continue preparation for ALJ Sanders' deposition.	7.80	\$610.00	\$4,758.00
07/13/2021	Review email correspondence between co-counsel and DAG re: subpoenaed date for J. Worthington deposition.	0.10	\$610.00	\$61.00
07/14/2021	Extended email correspondence with co-counsel re: percentage of federal IDEA money spent on dispute resolution, documentary evidence of same; and legal implications.	0.40	\$610.00	\$244.00
07/16/2021	Email correspondence with co-counsel and DAG re: rescheduling J. Worthington deposition.	0.10	\$610.00	\$61.00

07/19/2021	Telephone call with co-counsel re: issues for depositions of Worthington and Sanders and discovery matters; and email correspondence re: same.	0.80	\$610.00	\$488.00
07/21/2021	Zoom conference with co-counsel after status conference with magistrate to plan continuing discovery.	0.70	\$610.00	\$427.00
07/21/2021	Email correspondence with co-counsel re: personnel changes at NJDOE.	0.10	\$610.00	\$61.00
07/21/2021	Email correspondence with co-counsel re: availability to take depositions.	0.10	\$610.00	\$61.00
07/22/2021	Review co-counsel's letter to DAG re: complying with agreements made during case management conference; and email correspondence with co-counsel re: same.	0.10	\$610.00	\$61.00
07/22/2021	Email correspondence with co-counsel re: OAL will produce ALJ Sanders on date on subpoena, and 30(b)(6) witness following day.	0.20	\$610.00	\$122.00
07/23/2021	Review joint letter to magistrate re: final discovery schedule; and magistrate's scheduling order for final PTO.	0.10	\$610.00	\$61.00
07/23/2021	Review letter from DAG representing NJOAL re: depositions.	0.10	\$610.00	\$61.00
07/23/2021	Review MJ's scheduling order for pre-trial conference received via ECF 175 and email correspondence with co-counsel re: same.	0.10	\$610.00	\$61.00
07/23/2021	Review co-counsel's extended email correspondence with DAGs re: issues with completing depositions.	0.30	\$610.00	\$183.00
07/25/2021	Video conference call with co-counsel to plan for final week before discovery ends.	0.50	\$610.00	\$305.00
07/25/2021	Continue preparation for ALJ Sanders' deposition.	4.00	\$610.00	\$2,440.00
07/26/2021	Review ECF 176 letter to magistrate with discovery objections and opposing trial adjournment, and review notes of video conference call.	0.20	\$610.00	\$122.00
07/26/2021	Video conference with MJ re: status and discovery issues.	0.50	\$610.00	\$305.00
07/26/2021	Continue preparation for ALJ Sanders' deposition.	4.00	\$610.00	\$2,440.00
07/26/2021	Paralegal prepare exhibits for ALJ Sanders' deposition.	3.20	\$610.00	\$1,952.00
07/26/2021	Telephone call with co-counsel re: issues for Sanders' deposition.	0.60	\$610.00	\$366.00

07/27/2021	Receive and review docket entry for July 26 status conference, and new scheduling order.	0.20	\$610.00	\$122.00
07/27/2021	Continue preparation for ALJ Sanders' deposition.	6.40	\$610.00	\$3,904.00
07/27/2021	Email correspondence with co-counsel re: email with lead DAG with confirmed deposition dates; additional exhibits for depositions; and coordinating coverage.	0.40	\$610.00	\$244.00
07/28/2021	Deposition of former Chief Administrative Law Judge Laura Sanders and forward documents to DAGs afterward.	6.70	\$610.00	\$4,087.00
07/29/2021	Telephone conversation with co-counsel re: deposition of former ALJ Sanders yesterday and issues for deposition of John Worthington tomorrow.	0.70	\$610.00	\$427.00
07/29/2021	Review proposed consent order to disclose selected case files.	0.10	\$610.00	\$61.00
07/29/2021	Send exhibits from ALJ Sanders's deposition to DAG representing her and to DAG representing defendant.	0.10	\$610.00	\$61.00
07/29/2021	Review DAG's letter to MJ re: look-back period for deposition questions, and J. Rue's reply.	0.10	\$610.00	\$61.00
07/29/2021	Review co-counsel's outline and exhibit list for J. Worthington's deposition and make comments.	0.50	\$610.00	\$305.00
07/29/2021	Review DAG's letter to MJ and Ps' reply re: limiting look-back time for discovery received via ECF 181 & ECF 182.	0.20	\$610.00	\$122.00
07/29/2021	Email correspondence with co-counsel re: background of facts to elicit in Worthington's deposition.	0.20	\$610.00	\$122.00
07/30/2021	Attend and support deposition of John Worthington.	4.50	\$610.00	\$2,745.00
08/01/2021	Conference call with co-counsel on last week's depositions and upcoming ones.	0.40	\$610.00	\$244.00
08/02/2021	Email correspondence with co-counsel re: responding to particular issues during upcoming depositions.	0.20	\$610.00	\$122.00
08/03/2021	Telephone conversation with co-counsel re: background facts for depositions.	0.40	\$610.00	\$244.00
08/06/2021	Attend and support deposition of D. Rota.	6.30	\$610.00	\$3,843.00
08/10/2021	Telephone conversations and email correspondence with co-counsel re: subpoenaing additional witnesses.	0.40	\$610.00	\$244.00
08/10/2021	Attend and support deposition of Kathleen Ehling, NJDOE's FRCP 30(b)(6) designated witness.	6.50	\$610.00	\$3,965.00

08/10/2021	Video conference with co-counsel re: depositions and responding to DAG's direction to witnesses not to answer questions.	0.50	\$610.00	\$305.00
08/10/2021	Review MJ's order to release sample case files.	0.10	\$610.00	\$61.00
08/11/2021	Legal research review DNJ decision in in related case.	0.30	\$610.00	\$183.00
08/11/2021	Email correspondence with co-counsel re: seeking relief for DAG's directing witnesses not to answer questions based on alleged time frame of discovery.	0.20	\$610.00	\$122.00
08/12/2021	Preparation for OAL 30(b)(6) deposition tomorrow.	0.70	\$610.00	\$427.00
08/12/2021	Email correspondence with co-counsel and DAGs re: scheduling deposition of Carolyn Marano.	0.10	\$610.00	\$61.00
08/13/2021	Attend and support deposition of Chief ALJ Bass OAL's FRCP 30(b)(6) designee (2.5); travel to Newark (1.3).	3.80	\$610.00	\$2,318.00
08/13/2021	Conference call with co-counsel on next steps after OAL FRCP 30(b)(6) deposition.	0.50	\$610.00	\$305.00
08/13/2021	Email correspondence with co-counsel re: address to serve subpoena on C. Marano.	0.10	\$610.00	\$61.00
08/17/2021	Email correspondence and telephone conversation with Carolyn Marano re: subpoena served; and email correspondence with co-counsel re: same.	0.20	\$610.00	\$122.00
08/18/2021	Email correspondence with DAGs re: C. Marano represented by them and forward copy of subpoena served.	0.20	\$610.00	\$122.00
08/18/2021	Email correspondence with co-counsel re: DAG for OAL's claim that depositions of ALJ Sanders and ALJ Bass are subject to confidentiality order and review drafts of response to MJ.	0.20	\$610.00	\$122.00
08/20/2021	Electronic Case Filing notice from federal court rescheduling trial for November 8, 2021 and pretrial logistics conference for October 25, 2021.	0.10	\$610.00	\$61.00
08/25/2021	Review draft letter to DAG representing OAL re: designating depositions confidential and email correspondence with co-counsel re: same.	0.20	\$610.00	\$122.00
08/25/2021	Review co-counsel's letter to MJ ECF 192 renewing request re: DAGs directing deposition witnesses not to answer questions.	0.10	\$610.00	\$61.00

08/26/2021	Telephone conversation with co-counsel re: issues for Marano deposition.	0.30	\$610.00	\$183.00
08/27/2021	Paralegal prepare exhibits for C. Marano deposition.	3.40	\$610.00	\$2,074.00
08/27/2021	Email correspondence with co-counsel and court reporter confirming details and links for Marano deposition.	0.20	\$610.00	\$122.00
08/27/2021	Review text order re: scheduling oral argument on deliberate privilege received via ECF notice; and review DAG's letter re: same ECF 194.	0.20	\$610.00	\$122.00
08/27/2021	Email correspondence with DAG re: follow up on document requests from Rota deposition and needed for Marano deposition.	0.10	\$610.00	\$61.00
08/28/2021	Preparation for deposition of Carolyn Marano.	4.10	\$610.00	\$2,501.00
08/29/2021	Preparation for deposition of Carolyn Marano.	8.00	\$610.00	\$4,880.00
08/30/2021	Complete preparation for deposition of Carolyn Marano.	1.00	\$610.00	\$610.00
08/30/2021	Deposition of Carolyn Marano.	6.40	\$610.00	\$3,904.00
08/30/2021	Telephone conversations with co-counsel re: Marano deposition and next steps.	0.80	\$610.00	\$488.00
08/30/2021	Email correspondence with co-counsel re: follow up on Marano deposition.	0.20	\$610.00	\$122.00
08/31/2021	Extended email correspondence with co-counsel re: items identified in depositions to follow up with subpoenas and relevance to upcoming depositions and other evidentiary issues.	0.40	\$610.00	\$244.00
09/02/2021	Review letters filed via ECF this week and other documents re: issues for argument on motions to compel today.	0.40	\$610.00	\$244.00
09/02/2021	Attend oral argument on discovery motions.	1.70	\$610.00	\$1,037.00
09/02/2021	Video conference with co-counsel re: tasks after discovery motion hearing.	0.50	\$610.00	\$305.00
09/03/2021	Attend and support deposition of C. Hendricks of OAL.	9.30	\$610.00	\$5,673.00
09/16/2021	Review messages on motion to compel and SJ motion.	0.20	\$610.00	\$122.00
09/17/2021	Video conference with co-counsel re: trial date moved and coordinate next steps.	0.50	\$610.00	\$305.00
09/20/2021	Review documents to discuss during team call.	0.20	\$610.00	\$122.00
09/20/2021	Video conference with trial team on next steps.	1.00	\$610.00	\$610.00

09/22/2021	Video conference with co-counsel re: SJ motion and motions <i>in limine</i> .	1.40	\$610.00	\$854.00
09/22/2021	Email correspondence with co-counsel re: opposition to confidentiality designations, 45-day issue pending in 3d Cir.; and pre-trial preparation.	0.40	\$610.00	\$244.00
09/28/2021	Review letter to DAG re: due dates for pre-trial order.	0.10	\$610.00	\$61.00
09/29/2021	Review draft pre-trial order.	0.50	\$610.00	\$305.00
09/30/2021	Video conference with co-counsel re: amici as witnesses.	1.00	\$610.00	\$610.00
09/30/2021	Electronic Case Filing notice from federal court scheduling on the record discovery conference on deliberative process issue for October 8; and letters from DAGs requesting extension of time ECF 219 and ECF 220.	0.20	\$610.00	\$122.00
10/01/2021	Video conference with co-counsel re: argument on motion to compel; and calling state witnesses.	1.00	\$610.00	\$610.00
10/01/2021	Electronic Case Filing notice from federal court rescheduling October 8 on the record conference to October 12.	0.10	\$610.00	\$61.00
10/04/2021	Review/analyze documents on systemic witnesses in preparation for trial preparation video conference.	0.50	\$610.00	\$305.00
10/04/2021	Video conference with co-counsel re: trial preparation and planning.	1.00	\$610.00	\$610.00
10/04/2021	Review/analyze documents on systemic witnesses in preparation for trial preparation video conference.	0.80	\$610.00	\$488.00
10/04/2021	Review extensive email correspondence with co-counsel re: issues including subpoenas, motions to seal, and confidentiality designations.	0.30	\$610.00	\$183.00
10/05/2021	Video conference with co-counsel re: DAG's request for delay based on personal emergency; and email correspondence re: same.	0.40	\$610.00	\$244.00
10/06/2021	Electronic Case Filing notices from federal court re: change of trial date to December 15, 2021 ECF 224; and DAG's letter requesting emergency adjournment ECF 225.	0.20	\$610.00	\$122.00
10/06/2021	Review email correspondence from co-counsel with case re: evidence of public records.	0.20	\$610.00	\$122.00
10/06/2021	Review extensive email correspondence with co-counsel re: discovery and motion	0.40	\$610.00	\$244.00

	deadlines after trial adjourned; review draft letter to court re: same; and text orders ECF 227 and ECF 229.			
10/11/2021	Video conference with co-counsel and amici re: potential witnesses and testimony topics.	1.00	\$610.00	\$610.00
10/12/2021	Online oral argument on deliberative process issue; and follow up video conference with co-counsel.	2.30	\$610.00	\$1,403.00
10/14/2021	Review email re: follow up on deliberative process ruling; ECF order rescheduling final PTO; and other trial preparation.	0.20	\$610.00	\$122.00
10/14/2021	Review MJ's Discovery Order, Amended Scheduling Order, and text orders received via ECF 231, ECF 232, and ECF 233 notices.	0.20	\$610.00	\$122.00
10/21/2021	Review email correspondence re: continuing discovery issues, and legal arguments for proposed relief.	0.30	\$610.00	\$183.00
10/24/2021	Review email correspondence with co-counsel re: various discovery and trial preparation issues occurring while I was away.	0.60	\$610.00	\$366.00
10/25/2021	Review text order rescheduling Final Pretrial Conference to December 21st received via ECF 236 notice.	0.10	\$610.00	\$61.00
10/29/2021	Review notices in lieu of subpoenas sent to DAG for NJDOE witnesses.	0.10	\$610.00	\$61.00
11/03/2021	Review Ps' letter to MJ requesting Void Confidentiality Designations received via ECF notice 237.	0.10	\$610.00	\$61.00
11/08/2021	Review ECF notices re: assignment of new MJ; and new DAG on case; and review letter with trial subpoenas for OAL witnesses.	0.10	\$610.00	\$61.00
11/09/2021	Review draft letter to newly assigned MJ and email correspondence with co-counsel re: same.	0.10	\$610.00	\$61.00
11/12/2021	Review and revise draft of PTO and stipulation of facts including reviewing exhibits.	5.00	\$610.00	\$3,050.00
11/12/2021	Email correspondence with co-counsel re: serving subpoena on C. Marano.	0.20	\$610.00	\$122.00
11/15/2021	Video conference with co-counsel re: trial planning and preparation.	1.80	\$610.00	\$1,098.00
11/15/2021	Email correspondence with co-counsel re: issues for today's video conference.	0.20	\$610.00	\$122.00
11/17/2021	Review and revise draft SJ motion, Rule 56.1 statement, and 23(b)(2) brief.	3.80	\$610.00	\$2,318.00

11/18/2021	Email correspondence with co-counsel re: revisions to briefing.	0.20	\$610.00	\$122.00
11/18/2021	Review draft 23(b)(3) brief.	0.30	\$610.00	\$183.00
11/19/2021	Review and revise 23(b)(3) brief; and SJ motion papers.	3.20	\$610.00	\$1,952.00
11/22/2021	Review filed versions of motions for class certification and SJ; and text order from MJ setting teleconference for Dec. 6th for pretrial and pending discovery matters.	1.30	\$610.00	\$793.00
11/23/2021	Review draft Rule 11 motion.	0.20	\$610.00	\$122.00
11/23/2021	Review/analyze Ds' motion for SJ including Rule 56.1 statement.	0.30	\$610.00	\$183.00
11/24/2021	Email correspondence with co-counsel re: motions, scheduling, conference requested by new MJ, and trial preparation.	0.40	\$610.00	\$244.00
11/24/2021	Review letter re: scheduling of motions received via ECF 250; and correspondence from Ds requesting additional extensions of time; and responses to same.	0.30	\$610.00	\$183.00
11/28/2021	Video conference with co-counsel re: planning witness order and preparation; and next steps in trial preparation.	1.00	\$610.00	\$610.00
11/29/2021	ECF notices re: rescheduling conference with MJ; letter from DAG seeking extension of time to reply to motions; order granting extension; and Ps' Local Rule 7.1 request.	0.20	\$610.00	\$122.00
11/29/2021	Video conference with co-counsel re: Ds' request for motion adjournments; serving Rule 11 safe harbor; and trial preparation steps.	0.60	\$610.00	\$366.00
11/29/2021	Review draft letter re: 23(b) motion extension; and final Rule 11 safe harbor documents.	0.30	\$610.00	\$183.00
11/30/2021	Email correspondence with co-counsel re: revisions to Rule 11 brief; ECF notice of new due date for reply to SJ motion; and DAG's letter ECF 255 requesting extension of time on motion appealing MJ's discovery decision.	0.30	\$610.00	\$183.00
12/01/2021	Review letter from DAG and text orders re: extending motion received via ECF 256, ECF 257, and ECF 258.	0.10	\$610.00	\$61.00
12/02/2021	Review revised Rule 11 motion safe harbor papers sent to DAG.	0.20	\$610.00	\$122.00
12/03/2021	Email correspondence with co-counsel re: timing of PTO; and change of time for December 15 conference.	0.10	\$610.00	\$61.00

12/05/2021	Review email correspondence re: conferences and issues to be addressed.	0.20	\$610.00	\$122.00
12/06/2021	Review email correspondence from DAG requesting extension of time on motions and PTO and email correspondence with co-counsel re: same.	0.20	\$610.00	\$122.00
12/06/2021	Review letter re: motion to seal received via ECF 142.	0.10	\$610.00	\$61.00
12/07/2021	Extended email correspondence with co-counsel re: filing Rule 11 motion.	0.30	\$610.00	\$183.00
12/07/2021	Video conference with co-counsel re: evidentiary issues for trial.	0.50	\$610.00	\$305.00
12/08/2021	Email correspondence with co-counsel re: location of NJDOE witnesses and OAL still using federal days.	0.20	\$610.00	\$122.00
12/10/2021	Review ECF filings on motion dates; and draft letter re: same.	0.10	\$610.00	\$61.00
12/13/2021	Review DAG's letter re: PTO and Ps' reply; and text orders re: same received via ECF 267, ECF 268, ECF 269, and ECF 270.	0.30	\$610.00	\$183.00
12/14/2021	Status teleconference with MJ Skahill.	0.90	\$610.00	\$549.00
12/14/2021	Video conference with co-counsel following status conference with MJ.	0.40	\$610.00	\$244.00
12/14/2021	Email with co-counsel re: trial preparation issues; and review MJ's orders received via ECF.	0.50	\$610.00	\$305.00
12/15/2021	Video conference with co-counsel and DAGs for meet and confer on PTO then meeting and email correspondence with co-counsel re: same.	1.20	\$610.00	\$732.00
12/16/2021	Trial preparation including revisions to PTO.	2.50	\$610.00	\$1,525.00
12/16/2021	Trial preparation including PTO, and review reply brief on appeal of MJ decision.	3.60	\$610.00	\$2,196.00
12/20/2021	Video conference with co-counsel re: filed PTO, tomorrow's PTC, and next steps in trial preparation.	1.00	\$610.00	\$610.00
12/20/2021	Review and propose revisions to reply brief in motion to appeal MJ's discovery order; and review filed PTO and email correspondence with co-counsel re: same.	1.20	\$610.00	\$732.00
12/21/2021	Review filings and conference call with co-counsel in preparation for pre-trial conference; attend pre-trial conference; conference call with co-counsel afterward to plan next steps; additional conference	3.50	\$610.00	\$2,135.00

	call with MJ; and follow up with co-counsel.			
12/21/2021	Review and propose revisions to omnibus motion <i>in limine</i> .	0.30	\$610.00	\$183.00
12/22/2021	Review DAG's letter requesting adjournment and Ps' reply.	0.10	\$610.00	\$61.00
12/23/2021	Review and propose revisions to omnibus motion <i>in limine</i> and other trial preparation.	4.50	\$610.00	\$2,745.00
12/27/2021	Video conference with co-counsel re: pending motions and trial preparation.	1.50	\$610.00	\$915.00
12/27/2021	Review email correspondence from holiday weekend.	0.10	\$610.00	\$61.00
12/27/2021	Review Defendants' motion <i>in limine</i> and other ECF filings.	0.60	\$610.00	\$366.00
12/28/2021	Review Defendants' summary judgment motion, and other trial preparation.	3.70	\$610.00	\$2,257.00
12/30/2021	Trial preparation including for remote hearing.	1.20	\$610.00	\$732.00
01/02/2022	Review and propose revisions for opposition brief to Defendants' motion <i>in limine</i> ; and review issues on injunctive relief.	0.60	\$610.00	\$366.00
01/05/2022	Review Defendants' opposition to Plaintiffs' motion <i>in limine</i> ; and other trial preparation.	0.90	\$610.00	\$549.00
01/09/2022	Review and revise draft reply brief on motion <i>in limine</i> and other trial preparation.	0.50	\$610.00	\$305.00
01/10/2022	Video teleconference with co-counsel re: trial preparation.	0.60	\$610.00	\$366.00
01/12/2022	Review Defendants' reply brief to Plaintiffs' motion <i>in limine</i> ; and email correspondence with co-counsel re: preparation for status conference tomorrow and trial preparation.	0.70	\$610.00	\$427.00
01/13/2022	Video teleconference with co-counsel preparing for then discussing next steps after status conference with USDJ.	1.50	\$610.00	\$915.00
01/13/2022	Status conference with USDJ.	0.70	\$610.00	\$427.00
01/13/2022	Review and revise reply to Defendants' SJ motion and R 56.1 statement.	2.30	\$610.00	\$1,403.00
01/14/2022	Review and revise reply to Defendants' SJ motion and R 56.1 statement.	5.20	\$610.00	\$3,172.00
01/23/2022	Review and revise reply to 23(b)(2) and 23(b)(3) motions.	1.70	\$610.00	\$1,037.00
01/24/2022	Video teleconference with co-counsel re: trial preparation; and email correspondence re: same.	1.40	\$610.00	\$854.00

01/24/2022	Review Ds' opposition to Rule 11 motion.	0.40	\$610.00	\$244.00
02/04/2022	Video teleconferences with co-counsel re: trial preparation.	1.90	\$610.00	\$1,159.00
02/04/2022	Review deposition summaries.	0.30	\$610.00	\$183.00
02/10/2022	Trial Preparation reviewing deposition transcripts and selecting exhibits.	2.80	\$610.00	\$1,708.00
02/11/2022	Trial Preparation reviewing depositions and exhibits.	4.00	\$610.00	\$2,440.00
02/12/2022	Trial Preparation including reviewing depositions and exhibits and telephone conversations with co-counsel.	4.20	\$610.00	\$2,562.00
02/13/2022	Trial Preparation deposition and exhibit review and email correspondence with co-counsel.	3.50	\$610.00	\$2,135.00
02/14/2022	Meeting with co-counsel in preparation for final pre-trial conference; and other trial preparation when conference adjourned, including travel time.	6.00	\$610.00	\$3,660.00
02/14/2022	Email correspondence with witnesses re: trial adjourned, and review ECF filing.	0.30	\$610.00	\$183.00
02/21/2022	Review letter via ECF re: parties working to streamline trial and ECF notice of conference time change.	0.10	\$610.00	\$61.00
02/22/2022	Video conference with co-counsel re: preparation for status conference.	0.60	\$610.00	\$366.00
02/22/2022	Final pre-trial status conference.	1.00	\$610.00	\$610.00
02/22/2022	Video conference with co-counsel re: follow up on status conference.	0.50	\$610.00	\$305.00
03/02/2022	Telephone conversation with co-counsel re: issues for argument on March 8th.	1.00	\$610.00	\$610.00
03/03/2022	Video conference with co-counsel re: arguments on March 8th.	0.20	\$610.00	\$122.00
03/04/2022	Video conference with co-counsel re: preparation for March 8th conference.	1.00	\$610.00	\$610.00
03/06/2022	Review <i>in limine</i> motions in preparation for March 8 conference.	1.00	\$610.00	\$610.00
03/17/2022	Review decision and order on deliberative process and additional depositions ECF 349 & ECF 350.	0.30	\$610.00	\$183.00
03/30/2022	Email correspondence with co-counsel re: issues for D. Rota deposition.	0.20	\$610.00	\$122.00
03/30/2022	Review prior exhibits for Rota deposition.	0.20	\$610.00	\$122.00
04/01/2022	Review notes for Rota deposition and attend and support deposition.	3.50	\$610.00	\$2,135.00
04/08/2022	Attend and support deposition of NJDOE's 30(b)(6) witness including travel time.	6.70	\$610.00	\$4,087.00
04/11/2022	Prepare and forward timeline of 2019-2021 OAL matter showing 45 Day Rule violation.	0.40	\$610.00	\$244.00

04/12/2022	Email correspondence with co-counsel re: issues for trial preparation and upcoming depositions; and review DAG's correspondence re: depositions.	0.40	\$610.00	\$244.00
04/13/2022	Review deposition outline for ALJ Moscowitz and send proposed additions.	0.20	\$610.00	\$122.00
04/13/2022	Attend and support deposition of ALJ Moscowitz.	2.20	\$610.00	\$1,342.00
04/13/2022	Video conference with co-counsel re: next steps after ALJ Moscowitz's deposition.	1.00	\$610.00	\$610.00
04/14/2022	Review ECF text order re: mediation and Plaintiffs' counsel's reply.	0.10	\$610.00	\$61.00
05/03/2022	Review letters filed on ECF re: discovery consolidation and witness' failure to appear at deposition.	0.20	\$610.00	\$122.00
05/03/2022	Email correspondence with co-counsel re: responding to witness's failure to appear.	0.20	\$610.00	\$122.00
05/03/2022	Review transcript of ALJ Moscowitz's deposition.	0.40	\$610.00	\$244.00
05/31/2022	Review Plaintiffs' settlement letter and MJ's notice of rescheduling settlement conference.	0.10	\$610.00	\$61.00
06/08/2022	Video conference with co-counsel re: tomorrow's settlement conference.	1.10	\$610.00	\$671.00
06/14/2022	Review transcript of Chief ALJ Bass' deposition.	1.00	\$610.00	\$610.00
06/20/2022	Investigation of operation of other NJ tribunals for consideration for settlement; and email correspondence with co-counsel re: same.	0.90	\$610.00	\$549.00
06/21/2022	Review draft position statement on settlement for submission to MJ and email correspondence with co-counsel re: same.	0.30	\$610.00	\$183.00
07/08/2022	Review DAG's letter ECF 380 requesting adjournment of trial and Plaintiffs' response ECF 381 opposing same.	0.10	\$610.00	\$61.00
08/19/2022	Review opinion and order certifying classes received via ECF 384 & ECF 385.	1.10	\$610.00	\$671.00
08/22/2022	Legal research on use of hearsay in class certification requests and at trial.	0.40	\$610.00	\$244.00
08/24/2022	Video conference with co-counsel re: next steps in trial preparation following class certification; and telephone conversation with co-counsel re: trial preparation.	1.30	\$610.00	\$793.00
08/26/2022	Review letter to DAGs with proposed class notice.	0.20	\$610.00	\$122.00
08/30/2022	Review letter from DAG seeking leave to appeal class cert to 3d Cir. and requesting adjournment received via ECF notice; and	0.30	\$610.00	\$183.00

	email correspondence to co-counsel re: same.			
08/30/2022	Review Plaintiffs' proposed findings of fact and conclusions of law filed via ECF 389.	0.50	\$610.00	\$305.00
08/31/2022	Review Defendants' proposed findings of fact and conclusions of law filed via ECF 390.	0.90	\$610.00	\$549.00
09/01/2022	Review opinion and order denying motions for SJ and for sanctions; order converting trial dates to case management and hearing on pretrial motions; and order rescheduling trial dates received via ECF 391 & ECF 392.	1.10	\$610.00	\$671.00
09/07/2022	Review draft of proposed guidelines.	0.60	\$610.00	\$366.00
09/07/2022	Video conference with co-counsel re: revising guidelines to include in settlement discussions.	1.90	\$610.00	\$1,159.00
09/07/2022	Review letter from DAG re: motions <i>in limine</i> received via ECF 398.	0.10	\$610.00	\$61.00
09/12/2022	Review text order received via ECF notice re: motion to stay trial ECF 403 will be decided on papers.	0.10	\$610.00	\$61.00
09/19/2022	Review class counsel's letter to judge re: severing trial of B3 class; and DAG's letter re: same received via ECF 407 and 408.	0.40	\$610.00	\$244.00
09/20/2022	Review Ps' letter with stipulated trial exhibits received via ECF 409.	0.20	\$610.00	\$122.00
09/20/2022	Review docket entry and text order re: new 30(b)(6) deposition for Monday September 26, 2022 received via ECF 410 and ECF 411.	0.10	\$610.00	\$61.00
09/22/2022	Review Ps' letter with list of exhibits not stipulated to received via ECF 412.	0.10	\$610.00	\$61.00
09/23/2022	Video conference with co-counsel re: opening statements and witnesses to be called.	1.80	\$610.00	\$1,098.00
10/24/2022	Video conference with co-counsel re: case status and options for next steps.	1.20	\$610.00	\$732.00
10/25/2022	Review DAG's letter requesting telephone conference received via ECF 428.	0.10	\$610.00	\$61.00
12/12/2022	Review Plaintiffs' motion to approve class notice and notice plan.	0.30	\$610.00	\$183.00
12/28/2022	Review joint letter to DJ re: consent order received via ECF 441.	0.20	\$610.00	\$122.00
02/02/2023	Review proposed consent order and settlement agreement.	0.40	\$610.00	\$244.00
Total		331.60		\$202,276.00