

**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., ) **Case No. 1:19-cv-12807 (NLH/KMW)**  
individually and on behalf of )  
C.C., a minor child; A.S., )  
individually and on behalf of )  
A.A.S., a minor child; John and )  
Jane Doe, individually and on )  
behalf of their minor child; )  
James Doe, Y.H.S. and H.Y., ) **Judge Noel L. Hillman**  
individually and on behalf of )  
their minor child, C.H.S., J.M. ) **Magistrate Judge Matthew Skahill**  
and E.M. on behalf of their )  
minor child, C.M., M.M., )  
individually and on behalf of )  
K.M.; and on behalf of ALL )  
OTHERS SIMILARLY ) **Affirmation of Krista Rue, Esq.**  
SITUATED, )

**Plaintiffs,**

v.

**NEW JERSEY DEPARTMENT )  
OF EDUCATION; LAMONT )  
REPOLLET, Acting )  
Commissioner of Education,**

**Defendants.**

The undersigned, Krista Rue, Esq., hereby affirms the following:

1. I am an attorney, admitted to practice in the state of New Jersey and before this Court. I am personally familiar with the facts contained herein.
2. I am the Managing Partner of John Rue & Associates (“JRA”), appearing on behalf seven of the named plaintiffs in the above captioned matter.
3. I make this Certification, based on my personal knowledge and review of the relevant records, in support of the Motion, brought by substitute class counsel, to approve the stipulated amount of \$4.75 million in prevailing party fees in association with this Court’s approval of the settlement agreement.
4. I have been admitted to practice in New Jersey since 2002, and I have practiced in the area of special education law, representing parents, for approximately the last 9 years.
5. I received my undergraduate degree from Princeton University in 1999, and my Juris Doctor from Washington University in St. Louis in 2002. In 2020, I received a Masters Degree in Religion from Columbia University.
6. After law school, I was an Assistant Prosecutor in Somerset County, where I worked from November 2002 to March 2006. While there, I worked primarily on Juvenile Delinquency matters (major crimes), Domestic Violence matters and Sex Crimes and Child Abuse cases. While there, I authored the briefs on and argued the case before the Appellate Division in State in the interest of J.P.F., 368 N.J. Super 24, 845 A.2d 173 (App. Div. 2004), a published

decision that clarified the application of Megan's Law to juvenile offenders.

In my time at the Prosecutor's Office, I tried nearly 100 cases to verdict in either bench or jury trials, while settling via plea offer hundreds of others.

In March 2006, I left the Somerset County Prosecutor's Office to become an Associate at DiFrancesco, Bateman, et. al in Warren, NJ. There my practice centered primarily on Matrimonial Law matters in addition to several civil litigation matters and municipal court prosecution. While there, I co-authored the appeal to the Appellate Division and the New Jersey Supreme Court in *Mackinnon v. Mackinnon*, 191 N.J. 240, 922 A.2d 1252 (2007). In February 2008, I left DiFrancesco Bateman, et. al to become Senior Matrimonial Associate at Aronsohn Weiner in Hackensack.

In 2009, I went into solo private practice, concentrating my practice in Matrimonial and Criminal practice, but also adding Employment Discrimination cases, including advocacy for teachers against school districts, civil business disputes and contract claims. I was Of Counsel to Flanzbaum & Cohen in Warren, NJ and Aretsky & Aretsky in Bergen County. I also was a consultant to several law firms on matters involving international custody disputes.

In 2012-2013, I worked with the New Jersey Legislature to draft and enact the Craft Distilling Law, N.J.S.A. 33:1-10.3d, while simultaneously receiving a

distilling license for the first distillery to open in New Jersey since the end of Prohibition.

I have served on the Executive Committees of the New Jersey State Bar Young Lawyers' Division and the Family Law Section. I was a voting member of the General Counsel from 2008-2010. I served as a Delegate from New Jersey to the American Bar Association at the National Convention in 2008. I served as the Chair of the Vincent J. Appuzzuse Mock Trial Competition for Somerset County from 2006-2008. From 2018 to 2021, I served on the Supreme Court's Fee Arbitration Committee. In 2019, I received the Equal Justice Medal from Legal Services of New Jersey for my work with victims of domestic violence. I am also a Trustee of the Innisfree Foundation), a 501(c)(3) organization which advocates on behalf of impoverished and minority students with disabilities in obtaining services from their public schools. I was recently elected to be the Board Treasurer.

7. I joined John Rue & Associates in 2016 as Counsel, expanding the practice I began as a solo practitioner. Since joining JRA, my practice areas have broadened to include representation of parents in disputes with public school districts as well as private schools, focusing on representation of families of children with disabilities. I have been the primary counsel for matters at JRA in which a trial has been required.

8. JRA initially billed me as Counsel, at a rate of \$315 per hour for OPRA cases, \$350 per hour for education cases, and \$400 per hour for civil and matrimonial cases, which rates were in line with what I had charged clients in my solo practice.
9. In November of 2016, I was promoted to Partner. From that date, JRA billed my time at \$390 per hour for OPRA, \$445 per hour for education and civil matters, and \$450 per hour for matrimonial clients. In 2022, I was promoted to Managing Partner. From that date, JRA billed my time pursuant to the rate schedule set forth below at paragraph 16.
10. John Rue, Esq. been admitted to practice in New York since 2005 and New Jersey since 2005, and he has practiced in the area of special education law, representing parents, for approximately the last 18 years. He is admitted to practice before the courts of the State of New Jersey, the State of New York, the United States District Court for the District of New Jersey, and the Southern and Eastern Districts of New York, and the United States Courts of Appeals for the Second and Third Circuits.
11. He received his BA (Hons.) from Nottingham Trent University in 1990 and an MFA from Sarah Lawrence College in 1993. He received his J.D. from Fordham Law School in 2004, graduating *magna cum laude*, and serving as a Notes and Articles Editor of the Fordham Law Review.
12. John Rue began his legal career at White and Case LLP as an Associate in that

firm's Litigation practice group, where he practiced from 2004-2012.

His practice at White & Case included defending complex nationwide class actions, including, among others, (i) defending Deutsche Bank in the consolidated securities class actions related to the collapse of Enron, *In re Enron Corp. Sec.*, 529 F. Supp. 2d 644 (S.D. Tex. 2006); (ii) defending Saudi Aramco in multiple antitrust class actions brought against commercial oil companies owned by the sovereign members of OPEC, in *In re Refined Petroleum Products Antitrust Litigation*; and (iii) defending Belarusian Potash Company in the consolidated antitrust class actions styled *In re Potash*. (All of the above cited cases were also consolidated as Multi-District Litigations.) While at White & Case, he was also able to do a great deal of Special Education *pro bono* litigation, primarily in the area of New Jersey Special Education.

John Rue also served as co-lead trial counsel with Education Law Center in the New Jersey Supreme Court's remand for findings of fact and conclusions of law regarding revisions to the New Jersey School Funding Formula under the well-known *Abbott* cases; that trial was presided over by special master Judge Peter Doyne (then Assignment Judge for Bergen County) in *Abbott v. Burke*, also known as *Abbott XXI*

13. In 2014, John Rue began his own practice, focusing on Special Education and Civil Rights litigation in New Jersey. He now spends most of his professional

time representing parents of children with disabilities and representing the Innisfree Foundation as its outside counsel in OPRA disputes with public schools.

14. When he left White & Case, in 2012, John Rue was a senior associate. His time was billed to White & Case's clients at \$690 per hour.

15. When he started JRA in 2014, John Rue billed his time to clients at a rate of \$350 per hour, but quickly increased that to \$400 per hour. In 2017, with increases in the firm's rates, JRA raised John Rue's hourly rate to \$495 per hour.

16. In December of 2021, JRA instituted a new fee structure. Those rates are listed below:

**Special Education Dispute Resolution, and Regulatory Compliance Services**

John Rue (Principal): .....	\$450 per hour
Partner: .....	\$445 per hour
Counsel (10 or more years of experience): .....	\$400 per hour
Managing Associate (5-10 years of experience): .....	\$350 per hour
Associate (2-5 years of experience): .....	\$300 per hour
Junior Associate (0-2 years of experience): .....	\$250 per hour
Law Clerk (not yet admitted): .....	\$200 per hour
Paralegal work (by whomever performed): .....	\$150 per hour
Paralegal intern: .....	\$75 per hour

**Civil Litigation in New Jersey Superior Court or Lesser Courts**

John Rue (Principal): .....	\$475 per hour
Partner: .....	\$470 per hour
Counsel (10 or more years of experience): .....	\$425 per hour
Managing Associate (5-10 years of experience): .....	\$350 per hour
Associate (2-5 years of experience): .....	\$300 per hour
Junior Associate (0-2 years of experience): .....	\$250 per hour
Law Clerk (not yet admitted): .....	\$200 per hour
Paralegal work (by whomever performed): .....	\$150 per hour
Paralegal intern: .....	\$75 per hour

**Federal Litigation, including Due Process Hearing Appeals, and Appeals in State Court**

John Rue (Principal): .....	\$690 per hour
Partner: .....	\$550 per hour
Counsel (10 or more years of experience): .....	\$500 per hour
Managing Associate (5-10 years of experience): .....	\$400 per hour
Associate (2-5 years of experience): .....	\$300 per hour
Junior Associate (0-2 years of experience): .....	\$250 per hour
Law Clerk (not yet admitted): .....	\$200 per hour
Paralegal work (by whomever performed): .....	\$150 per hour
Paralegal intern: .....	\$75 per hour

17. Since raising our rates in 2021, JRA has billed numerous clients, across practice areas, at the above stated rates. While we have offered some discounts to clients where appropriate, our fee agreements generally reflect the rate structure set forth above.

18. In August 2022, JRA was appointed sole Class Counsel in the instant action.

19. Because the work performed in this matter was Federal Litigation, we used the following rates in calculating the lodestar for the Firm:

John Rue (Principal): .....	\$690 per hour
Partner: .....	\$550 per hour
Counsel (10 or more years of experience): .....	\$500 per hour
Managing Associate (5-10 years of experience): .....	\$400 per hour
Associate (2-5 years of experience): .....	\$300 per hour
Junior Associate (0-2 years of experience): .....	\$250 per hour
Law Clerk (not yet admitted): .....	\$200 per hour
Paralegal work (by whomever performed): .....	\$150 per hour
Paralegal intern: .....	\$75 per hour

20. Prior to February 18, 2023, the date on which JRA finalized the terms of the settlement in this matter, JRA's attorneys and staff had billed 5,388.35 hours to its work in the instant matter. This work has a value of \$2,777,567.54 using the rates listed at paragraph 19. JRA also incurred \$27,631.59 in costs and expenses associated with its role as the primary prosecutor of the Classes'



claims. A true and correct copy of pro forma documenting the hours and fees is attached hereto at Exhibit A. A list of timekeepers and their admission dates is attached at Exhibit B.

21. From February 18, 2023 until June 1, 2023, Mr. Rue billed 323.1 hours to this matter. During the same period, I worked 96 hours on this matter.

22. At the beginning of June 2023, JRA formally accepted the State's proposal of \$4.75 million in attorneys' fees. Accordingly, at that point, JRA ceased maintaining contemporaneous billing records in this case.

23. However, JRA remained very actively involved in the prosecution of the case from that time until JRA's withdrawal as Class Counsel, on September 13, 2023, as this time period included filing the first and amended Motions for Preliminary Approval, appearances before this Court, internal negotiations and other motion practice. In fact, both Mr. Rue and I devoted just about our full time attention to the case during this three and a half month period.

24. Based on JRA's billing records, and extrapolating from Mr. Rue's 2022 hours billed to this case, I estimate that we each worked approximately 375 hours from June 1 to September 13, 2023.

25. The sum total of the above time is 698 hours for Mr. Rue (which computes to \$481,689 at his requested billing rate of \$690 per hour), and 471 hours for me (which computes to \$259,050 at my requested rate of \$550 per hour), for a total of \$740,739 in fees waived by JRA by the February 18, 2023 cutoff. This total does not include paralegal time after February 18, 2023.

26. The above estimate is provided only for context, and not to seek compensation for this time. Especially considering this additional waiver, the stipulated fee amount of \$4.75 million for all timekeepers across the case, is eminently reasonable.

**JRA's Contribution to the Prosecution of this Action**

27. In 2019, John Rue was instrumental in forming the group that brought this class action. Without his efforts, this case would not have been brought, as it had been declined by the Education Law Center and the Rutgers Clinic on separate occasions, and none of the other attorneys involved, who had been practicing in this area for decades, were willing to take the risk attendant with bringing the case.

28. Moreover, from the time this action was commenced until shortly before JRA withdrew as Class Counsel (doing so in the best interests of the absent members of the Classes), JRA had full authority over all aspects of this case, including all tracks – pretrial discovery, motion practice and related briefing, trial preparation, and settlement.

29. In February 2023, after negotiating extensively (with the assistance of firms contracted by JRA to do so), John Rue personally executed, on behalf of the certified Classes, the class settlement now presented (modified only as to peripheral matters, but retaining the substance of the Agreement entered a year ago) to the Court for approval.

30. During the pendency of the case, JRA took enormous financial risk, and made tremendous financial sacrifices. In 2019, when the case was filed, JRA had no debt, and employed five lawyers directly (not including of-counsel relationships), and also employed between six and eight non-attorney staff members. Today, JRA has accrued over \$1.5 million in debt, and has been reduced to two lawyers (John Rue and me), and one paralegal.

31. These facts should be considered when determining the fair value of the Firm's hourly rates, which I submit to this Court should be deemed to be those set forth in Paragraph 19.

I hereby certify the foregoing statements made by me are true to the best of my knowledge. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: March 7, 2024

*Krista Haley Rue*

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Krista Haley Rue

# **EXHIBIT A**

# John Rue & Associates, LLC

100 Overlook Center 2nd Floor #9211

Princeton, NJ 08540

Phone: 862-283-3155 | Fax: 973-860-0869

## PRE-BILL

CP v. NJDOE Class Action

Invoice Date: February 29, 2024

Invoice Number: Pre-bill

Invoice Amount: \$2,794,869.13

### Matter: Class Action 45-Day Case

Attorney's Fees					
4/5/2016	Legal Research	M.C.	300.00	.40	\$120.00
5/11/2016	Draft letter requesting cases	E.S.	250.00	1.30	\$325.00
5/12/2016	Draft Letter	E.S.	250.00	.30	\$75.00
5/12/2016	Attention to 45 day letter example request; email correspondence with Mr. Rue as to same.	M.C.	300.00	.50	\$150.00
5/13/2016	Legal Research	E.S.	250.00	.50	\$125.00
9/12/2017	attention to voice mail from potential plaintiff; Attention to follow up call as to same; attention to email correspondence to Denise.; attention to review intake form.	M.C.	300.00	.60	\$180.00

9/26/2017	attention to email correspondence with Denise Dwyer	M.C.	300.00	.10	\$30.00
9/27/2017	attention to sending request (attention to speaking with John re future requests)	S.T.	200.00	1.50	\$300.00
10/31/2017	File review and correspondence with Dept of Education	A.E.	200.00	2.00	\$400.00
11/1/2017	Call with Assistant AG to discuss appellate opinion and extension	A.E.	200.00	.50	\$100.00
11/3/2017	Emails with DOE to strategize OPRA response formatting	A.E.	200.00	.40	\$80.00
12/15/2017	Correspondence with Kathryn Duran & colleague re: DOE OPRA submission	A.E.	200.00	.50	\$100.00
12/19/2017	NJ DOE: Request for response; Search for response; response review	A.E.	200.00	1.00	\$200.00
5/11/2018	Attention to drafting OPRA request to OAL	L.G.	200.00	.50	\$100.00
5/15/2018	Attention to litigation strategy.	W.I.P.	500.00	.30	\$150.00
5/18/2018	Assemble list of plaintiffs	D.S.	550.00	.30	\$165.00
5/18/2018	Prepare Complaint Investigation, including researching factual background, related legal research, and drafting Complaint Investigation on State's form. Review/revise same and circulate for internal review.	D.S.	550.00	6.20	\$3,410.00

5/31/2018	Telephone conference re: strategy for handling	D.S.	550.00	.90	\$495.00
3/11/2019	Pre-litigation diligence.	J.D.R.	690.00	1.00	\$690.00
3/29/2019	Communications with opposing counsel to arrange in-person meeting.	J.D.R.	690.00	.30	\$207.00
3/29/2019	Pre-litigation diligence; call with co-counsel re same.	J.D.R.	690.00	1.50	\$1,035.00
4/22/2019	Confer re: strategy in light of Hillman's opinion in JA	D.S.	550.00	.70	\$385.00
4/22/2019	Attention to Judge Hillman's decision in JA	J.D.R.	795.00	1.10	\$874.50
4/23/2019	Conference call with C. Reisman about participation in class action; follow-up re: same	D.S.	550.00	.80	\$440.00
4/24/2019	Phone call with potential class rep; confer re: strategy for handling	D.S.	550.00	.90	\$495.00
4/25/2019	Call with A.S. re class action.	J.D.R.	690.00	.60	\$414.00
4/25/2019	Correspondence with co-counsel re class action.	J.D.R.	690.00	1.50	\$1,035.00
4/26/2019	Legal research; detailed attention to strategy; communications with co-counsel re same.	J.D.R.	690.00	2.20	\$1,518.00
4/26/2019	Attention to drafting class action complaint.	J.D.R.	690.00	5.50	\$3,795.00

4/30/2019	Review draft complaint and correspondence	L.Q.	500.00	.50	\$250.00
4/30/2019	Participate (telephonically) in plaintiff team meeting	D.S.	550.00	.50	\$275.00
4/30/2019	Meeting with Mr. Thurston re strategy and logistics (2.0); plaintiff's steering committee (2.0); meeting with Ms. Dwyer re strategy and logistics (1.5); travel re same (4.5)	J.D.R.	690.00	10.00	\$6,900.00
5/7/2019	Discussion with JR re class action and engagement agreements; attention to gathering client info for engagement agreements	L.G.	200.00	.50	\$100.00
5/7/2019	Review draft email re: leadership; attend to same	D.S.	550.00	.30	\$165.00
5/8/2019	Review draft of complaint with comments and conf. call call with COPAA (.3)	L.Q.	500.00	.50	\$250.00
5/8/2019	Call with co-counsel re strategy and collaboration.	J.D.R.	690.00	1.50	\$1,035.00
5/9/2019	Communication with co-counsel re collaboration.	J.D.R.	690.00	2.50	\$1,725.00
5/9/2019	Meeting with Mr. Thurston re strategy and logistics; travel to and from same.	J.D.R.	690.00	5.50	\$3,795.00
5/10/2019	Preparing OPRA Request re Attorney General Presentation.	S.D.	150.00	.30	\$45.00
5/10/2019	Meeting with co-counsel; travel re same.	J.D.R.	690.00	3.50	\$2,415.00
5/11/2019	Further research and drafting complaint.	J.D.R.	690.00	2.50	\$1,725.00



5/11/2019	Legal research re preliminary injunction; preliminary attention to drafting motion brief re same.	J.D.R.	690.00	4.40	\$3,036.00
5/13/2019	Brief overview of case/scheduling of firm meeting regarding class action lawsuit.	S.Q.E.	500.00	.20	\$100.00
5/13/2019	Coordinate team meeting.	J.D.R.	690.00	.30	\$207.00
5/13/2019	Attention to drafting engagement agreements	L.G.	200.00	.90	\$180.00
5/13/2019	Review Draft complaint and class counsel revisions and comments. Attention to correspondence re: class leadership	L.Q.	500.00	.70	\$350.00
5/13/2019	Fact gathering re AG program on sped advocacy.	J.D.R.	690.00	1.50	\$1,035.00
5/13/2019	Attention to legal research and drafting preliminary injunction brief.	J.D.R.	690.00	4.20	\$2,898.00
5/14/2019	Further attention to legal research re complaint; drafting.	J.D.R.	690.00	3.50	\$2,415.00
5/15/2019	Review revisions to draft complaint (.2) and phone confernce with COPAA (.8)	L.Q.	500.00	1.00	\$500.00
5/15/2019	Conference call with team	D.S.	550.00	1.50	\$825.00
5/15/2019	Attention to strategy & revision of draft complaint	K.H.	550.00	2.50	\$1,375.00
5/15/2019	Further attention to research and drafting complaint. Consultations with co-counsel.	J.D.R.	690.00	4.70	\$3,243.00

5/16/2019	C3 Daily meeting	L.Q.	500.00	.20	\$100.00
5/16/2019	Further attention to legal research, drafting complaint. Call with co-counsel, preparation and follow-up to same.	J.D.R.	690.00	5.50	\$3,795.00
5/17/2019	Gathering Client Data re "Doe," Sending Data to Don.	S.D.	150.00	.40	\$60.00
5/17/2019	Firm meeting re class action case; discussion with DS re class action engagement agreements; internal emails re same; research client info for complaint; email same to DS	L.G.	200.00	1.00	\$200.00
5/17/2019	Meeting to discuss Class Action case/tasks provided for submission by noon/research SBC file for relevant information to complete section of complaint/review section/emails regarding required information/submission.	S.Q.E.	500.00	1.20	\$600.00
5/17/2019	Attention to strategy for complaint	K.H.	550.00	1.80	\$990.00
5/17/2019	Convene JRA Team Meeting regarding project; draft factual inserts for complaint; manage team project and attend to completion of same and transmittal of inserts to L. Quartarolo	D.S.	550.00	2.30	\$1,265.00
5/17/2019	Research details of Plaintiff cases to provide key litigation dates and calculate number of days of litigation, revise NJSEP report section, review and add revisions received from other counsel and well as own revisions as v4 of complaint.	L.Q.	500.00	3.30	\$1,650.00
5/20/2019	Attention to FOIA documents and analysis of same	K.H.	550.00	.50	\$275.00
5/20/2019	Review revised draft of complaint, attention to correspondence with class counsel, review FOIA response from USDOE re: NJDOE non-compliance	L.Q.	500.00	1.00	\$500.00
5/20/2019	Further attention to drafting complaint. Review of US-DOE materials. Emails with co-counsel re strategy and drafting.	J.D.R.	690.00	6.80	\$4,692.00

5/21/2019	TC with class counsel	L.Q.	500.00	.50	\$250.00
5/21/2019	participate in team call (partial)	D.S.	550.00	.50	\$275.00
5/21/2019	Attention to drafting engagement agreements for class plaintiffs; attention to emailing same to class plaintiffs	L.G.	200.00	1.50	\$300.00
5/21/2019	Attention to counsel comments and review of revised complaint and supporting case law from class counsel	L.Q.	500.00	.70	\$350.00
5/21/2019	Discussion of pending complaint submission/emails reg. potential plaintiffs.	S.Q.E.	500.00	.70	\$350.00
5/21/2019	Confer with J. Rue re: strategy for group agreement and strategy for OSER documents	D.S.	550.00	.70	\$385.00
5/21/2019	Attention to joint venture agreement proposal	K.H.	550.00	1.00	\$550.00
5/21/2019	Further attention to collaboration with co-counsel; joint prosecution agreement; interim lead counsel agreement.	J.D.R.	690.00	2.20	\$1,518.00
5/21/2019	Further attention to drafting class action complaint.	J.D.R.	690.00	5.50	\$3,795.00
5/22/2019	Compiling Plaintiff Information.	S.D.	150.00	.10	\$15.00
5/22/2019	Assisting Saran re Civil Cover Sheet.	S.D.	150.00	.10	\$15.00
5/22/2019	Firm Planning re Class Action.	S.D.	150.00	1.00	\$150.00

5/22/2019	Attend to final review of documents to be filed; provide guidance re: filing	D.S.	550.00	.50	\$275.00
5/22/2019	Reviewed as-filed complaint; Drafted email to media regarding same.	W.I.P.	500.00	.80	\$400.00
5/22/2019	Firm review of status of class action and workload expectations; share FOIA documents with firm staff	L.Q.	500.00	1.00	\$500.00
5/22/2019	Firm Meeting to discuss Class Action Complaint	D.S.	550.00	1.00	\$550.00
5/22/2019	Firm meeting re class action filing; attention to drafting notice of appearances for counsel; attention to reading US DOE ltr to NJ DOE re non-compliance with 45 day rule; attention to attorney emails re service of class action complaint	L.G.	200.00	3.70	\$740.00
5/22/2019	Work on proposed Consent Order	D.S.	550.00	1.80	\$990.00
5/22/2019	Complaint filing prep, meeting regarding complaint/case, complaint submission, emails pertaining to the above. Discussion of subsequent steps/case strategy.	S.Q.E.	500.00	5.50	\$2,750.00
5/22/2019	Finalizing class action complaint.	J.D.R.	690.00	4.50	\$3,105.00
5/22/2019	Further communications with co-counsel; strategy; legal research re PI motion.	J.D.R.	690.00	3.50	\$2,415.00
5/23/2019	Calls to Christine Soto/DOE re Service of Summons/Complaint.	S.D.	150.00	.50	\$75.00
5/23/2019	Emails from counsel regarding complaint and next steps, initial research on process service, search for Dist. Ct. Docs/admissino requirements.	S.Q.E.	500.00	1.80	\$900.00

5/23/2019	Detailed communications with C.P. re terms of engagement agreement.	J.D.R.	690.00	1.50	\$1,035.00
5/23/2019	Further attention to drafting consent CMO; coordination with co-counsel re same.	J.D.R.	690.00	2.50	\$1,725.00
5/23/2019	Further attention to communications with co-counsel; legal research re preliminary issues.	J.D.R.	690.00	3.30	\$2,277.00
5/24/2019	Document Review re Non-Compliance Letter to NJDOE.	S.D.	150.00	.10	\$15.00
5/24/2019	Document Review re Non-Compliance Letter to NJDOE cont.	S.D.	150.00	.10	\$15.00
5/24/2019	Document Review re Non-Compliance Letter to NJDOE cont.	S.D.	150.00	.10	\$15.00
5/24/2019	Review draft consent order and further revisions from class counsel	L.Q.	500.00	.40	\$200.00
5/24/2019	Communications w Named Plaintiffs Enclosing Class Action Complaint.	S.D.	150.00	1.60	\$240.00
5/28/2019	Communications w Named Plaintiffs Enclosing Class Action Complaint.	S.D.	150.00	.50	\$75.00
5/28/2019	Attention to article in Spotlight and correspondence among counsel re: NJDOE remediation plan	L.Q.	500.00	.20	\$100.00
5/29/2019	Review/revise draft Summonses; guidance re: service	D.S.	550.00	.40	\$220.00
5/29/2019	Research on registered agent for NJDOE/calls to NJLS and Guaranteed Subpoena seeking informatino on registered agent for NJDOE and prices/emails pertaining to the same/summons	S.Q.E.	500.00	1.40	\$700.00

	creation/submission to Guaranteed Subpoena of class action complaint and subpoenas for Defendants/emails regarding nec. docs.				
5/31/2019	Email from Maria Strunk re class action engagement agreement	L.G.	200.00	.10	\$20.00
6/4/2019	Review of complete case file documents	L.Q.	500.00	.20	\$100.00
6/4/2019	Further attention to drafting joint prosecution agreement; emails with co-counsel re same; further attention to drafting proposed CMO; email with adversaries re same; legal research re same.	J.D.R.	690.00	2.50	\$1,725.00
6/5/2019	Review joint prosecution agreement	L.Q.	500.00	.20	\$100.00
6/5/2019	Attention to correspondence and joint venturing	K.H.	550.00	.30	\$165.00
6/6/2019	Attention to emails re document requests	L.G.	200.00	.30	\$60.00
6/6/2019	Attention to emails re: various FOIA and OPRA documents requests by counsel	L.Q.	500.00	.20	\$100.00
6/6/2019	Further attention to finalizing joint prosecution agreement.	J.D.R.	690.00	1.10	\$759.00
6/6/2019	Further attention to fact gathering re USDOE non-compliance letter, and related documents and information.	J.D.R.	690.00	2.20	\$1,518.00
6/7/2019	Distributing Final Draft of Group Contacts List to Group.	S.D.	150.00	.10	\$15.00

6/7/2019	Attention to group contact list and group email confirmations	L.Q.	500.00	.10	\$50.00
6/7/2019	Gathering Additional Data/Drafting Group Contacts List cont., Checking Responses to Test E-Mail, Calls to Dwyer, Gran and Estrella re Confirm Receipt (left messages with all).	S.D.	150.00	.40	\$60.00
6/7/2019	Gathering Data/Drafting Group Contacts List cont., Sending to John for Approval.	S.D.	150.00	.50	\$75.00
6/7/2019	Looking into Group Connectivity Issues re Dwyer, Sending Test E-Mail, Calendaring Reminder re Call to Confirm in 4 Hours, Gathering Data/Drafting Group Contacts List.	S.D.	150.00	.80	\$120.00
6/7/2019	Gathering Additional Data/Drafting Group Contacts List.	S.D.	150.00	.90	\$135.00
6/12/2019	Further attention to fact gathering re NJDOE's attempts to comply with USDOE letter of non-compliance.	J.D.R.	690.00	1.60	\$1,104.00
6/17/2019	Reviewing/Formatting/Uploading Docket Entries.	S.D.	150.00	.10	\$15.00
6/17/2019	Attention to merging prior requests seeking docs from NJDOE regarding department's non-compliance.	S.Q.E.	500.00	1.00	\$500.00
6/18/2019	Reviewing/Formatting/Uploading Docket Entries.	S.D.	150.00	.10	\$15.00
6/18/2019	Email communications with DOE; further attention to consent order issues.	J.D.R.	690.00	.50	\$345.00
6/18/2019	Attention to merger of prior requests for records from NJDOE.	S.Q.E.	500.00	1.00	\$500.00
6/19/2019	Attention to correspondence re: TC with DAG; RThurston matter; and group email/service list	L.Q.	500.00	.20	\$100.00

6/19/2019	Prepare for and participate in conference call with adversary	D.S.	550.00	.30	\$165.00
6/19/2019	Call with DOE re preliminary issues; preparation for and follow-up to same.	J.D.R.	690.00	.50	\$345.00
6/19/2019	Completion and submission of merger/consolidated records request submission to John for review.	S.Q.E.	500.00	1.40	\$700.00
6/19/2019	Attention to fact gathering; legal research re RPCs applicable to same; communications with co-counsel re preliminary matters.	J.D.R.	690.00	2.50	\$1,725.00
6/20/2019	Reviewing/Formatting/Uploading Docket Entries.	S.D.	150.00	.10	\$15.00
6/20/2019	Meeting and fact gathering regarding letter drafting to the NJDOE re. prior document requests.	S.Q.E.	500.00	1.70	\$850.00
6/21/2019	Emails.	S.Q.E.	500.00	.30	\$150.00
6/23/2019	Finalization of letter to Commissioner Repollet and submission to John to review.	S.Q.E.	500.00	2.50	\$1,250.00
6/24/2019	Review/Format/Upload Docket Entry.	S.D.	150.00	.10	\$15.00
6/24/2019	Email regarding letter to Repollet.	S.Q.E.	500.00	.10	\$50.00
6/25/2019	Consolidated records requests/emails.	S.Q.E.	500.00	1.00	\$500.00
6/27/2019	Further attention to preliminary negotiations with DOE.	J.D.R.	690.00	.50	\$345.00



7/3/2019	Review Feinberg Engagement Agreement	D.S.	550.00	.20	\$110.00
7/7/2019	Team email re various issues related to preliminary procedure, potentially amending complaint to add new plaintiffs, seeking a preliminary injunction, correcting the docket, and other issues.	J.D.R.	690.00	1.50	\$1,035.00
7/8/2019	Review/Format/Upload Docket Entries.	S.D.	150.00	.10	\$15.00
7/8/2019	Determining Class Action Counsel Availability for Conference Call.	S.D.	150.00	.40	\$60.00
7/8/2019	Attend to strategy, including reflection on recent email	D.S.	550.00	.30	\$165.00
7/8/2019	Attention to revision of fee-split agreement	D.S.	550.00	.30	\$165.00
7/8/2019	Consultations with co-counsel re implications of action by individual plaintiffs and potential plaintiffs.	J.D.R.	690.00	1.10	\$759.00
7/8/2019	Attention to DNJ admission & application submission to court/attention to emails.	S.Q.E.	500.00	2.50	\$1,250.00
7/8/2019	Attention to contract governing fees and costs; call with Mr. O'Leary re same.	J.D.R.	690.00	2.20	\$1,518.00
7/9/2019	Drafting Calendar Invite to Class Action Counsel re Wednesday Conference Call.	S.D.	150.00	.10	\$15.00
7/9/2019	Calendar Invite to Class Action Counsel re Wednesday Conference Call cont.	S.D.	150.00	.10	\$15.00

7/9/2019	Strategy and planning; coordination with co-counsel.	J.D.R.	690.00	1.50	\$1,035.00
7/10/2019	Review/Format/Upload Docket Entry re Order.	S.D.	150.00	.10	\$15.00
7/10/2019	Review emails between co-counsel	D.S.	550.00	.10	\$55.00
7/10/2019	Comment on terms of proposed counsel agreement	D.S.	550.00	.20	\$110.00
7/10/2019	Communication with opposing counsel re preliminary procedural issues.	J.D.R.	690.00	.30	\$207.00
7/10/2019	Review of emails/emails regarding DNJ admission.	S.Q.E.	500.00	.40	\$200.00
7/10/2019	Attention to strategy and case-related correspondence	K.H.	550.00	.50	\$275.00
7/10/2019	Further attention to draft contract between co-counsel.	J.D.R.	690.00	.60	\$414.00
7/10/2019	Conference call with team	D.S.	550.00	.90	\$495.00
7/10/2019	Call with co-counsel; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
7/10/2019	Further legal research on irreparable harm.	J.D.R.	690.00	1.50	\$1,035.00
7/11/2019	Review correspondence from past week	L.Q.	500.00	.30	\$150.00

7/11/2019	Review/respond to emails re: strategy; phone calls re: same	D.S.	550.00	.40	\$220.00
7/11/2019	Review of communication from DOE counsel requesting additional adjournment.	J.D.R.	690.00	.50	\$345.00
7/11/2019	Review of emails/emails regarding status of Notice of Appearances for respective attorneys/Drafting of Notices of Appearances for the aforementioned attorneys.	S.Q.E.	500.00	1.60	\$800.00
7/12/2019	Review of emails.	S.Q.E.	500.00	.20	\$100.00
7/12/2019	Email regarding completion of Notices of Appearances/Firm address updating.	S.Q.E.	500.00	.20	\$100.00
7/12/2019	Phone call to discuss strategyu	D.S.	550.00	.50	\$275.00
7/12/2019	Call with Mr. Giles re potential plaintiff to add to case, and irreparable harm.	J.D.R.	690.00	1.50	\$1,035.00
7/12/2019	Call with Mr. Thurston re potential plaintiff to add to case, irreparable harm. Case coordination between two cases.	J.D.R.	690.00	1.80	\$1,242.00
7/15/2019	Review/Format/Upload Docket Entries re Notice of Appearance.	S.D.	150.00	.10	\$15.00
7/15/2019	Assisting Saran re Notices of Appearance.	S.D.	150.00	.30	\$45.00
7/15/2019	Review/approve draft Notice of Appearance	D.S.	550.00	.10	\$55.00
7/15/2019	Confer re: draft Counsel Agreement	D.S.	550.00	.10	\$55.00

7/15/2019	Attention to filing Notice of Appearance	D.S.	550.00	.10	\$55.00
7/15/2019	Conference call re: counsel agreement	D.S.	550.00	.20	\$110.00
7/15/2019	Confer re: strategy for response to adversary's email	D.S.	550.00	.30	\$165.00
7/15/2019	Attention to DNJ Admission for Saran Q. Edwards, court contact, emails regarding same.	S.Q.E.	500.00	.50	\$250.00
7/15/2019	Attention to Notices of Appearances for attorneys who have not yet filed.	S.Q.E.	500.00	1.80	\$900.00
7/15/2019	Further attention to agreement governing disbursement of fees and costs; call with Mr. O'Leary re same; follow-up to same.	J.D.R.	690.00	3.80	\$2,622.00
7/16/2019	Call to DNJ Helpdesk re Krista Login (no answer).	S.D.	150.00	.10	\$15.00
7/16/2019	Strategy Call	D.S.	550.00	.20	\$110.00
7/16/2019	Attention to Notice of Appearance/login credentials for Krista/emails regarding the same.	S.Q.E.	500.00	1.00	\$500.00
7/16/2019	Attention to preliminary strategy; communications with opposing counsel; planning for legal research; consideration of additional plaintiffs.	J.D.R.	690.00	3.80	\$2,622.00
7/17/2019	Assisting Saran re Print Screen/Print DNJ EFC Quiz Results.	S.D.	150.00	.10	\$15.00
7/17/2019	Scanning/Sending Saran DNJ ECF Registration Form to Saran.	S.D.	150.00	.10	\$15.00

7/17/2019	Call to DNJ Helpdesk re Krista Login, Getting Login Reset, E-Mail to Krista.	S.D.	150.00	.20	\$30.00
7/17/2019	Review correspondence re: exhaustion and IDEA; correspondence with A. Frisoli re: research on same	L.Q.	500.00	.20	\$100.00
7/17/2019	Legal research re irreparable harm.	J.D.R.	690.00	1.50	\$1,035.00
7/17/2019	Attention to filing of Notice of Appearance for Krista/Attention to DNJ Admission and Quiz, registration for DNJ Username for SQE.	S.Q.E.	500.00	2.40	\$1,200.00
7/18/2019	Finalization and submission of notices of appearance for KLH and SQE.	S.Q.E.	500.00	1.20	\$600.00
7/18/2019	Research and consideration re attachments to amended complaint.	J.D.R.	690.00	.80	\$552.00
7/19/2019	Communication with co-counsel; Strategy.	J.D.R.	690.00	.50	\$345.00
7/22/2019	Review/Format/Upload Docket Entries.	S.D.	150.00	.20	\$30.00
7/22/2019	Attention, review of emails.	S.Q.E.	500.00	.90	\$450.00
7/24/2019	Review correspondence	L.Q.	500.00	.10	\$50.00
7/24/2019	Review of emails.	S.Q.E.	500.00	.40	\$200.00
7/26/2019	Rsearch of National Prescription Opiod MDL case/search for motions, etc.	S.Q.E.	500.00	1.80	\$900.00

7/26/2019	Attention to co-counsel agreement.	J.D.R.	690.00	2.50	\$1,725.00
7/28/2019	Call with DAG re preliminary matters; preparation for and follow-up to same.	J.D.R.	690.00	1.80	\$1,242.00
7/29/2019	Research into National Prescription Opioid case regarding motions/other papers, emails regarding the same.	S.Q.E.	500.00	2.00	\$1,000.00
7/29/2019	Further attention to preliminary fact-gathering.	J.D.R.	690.00	1.60	\$1,104.00
7/30/2019	Review correspondence with DAG	L.Q.	500.00	.10	\$50.00
7/31/2019	Review of email.	S.Q.E.	500.00	.10	\$50.00
8/1/2019	Review of OPRA request submitted to Commissioner of Education	L.Q.	500.00	.10	\$50.00
8/1/2019	Preparing Correspondence re OPRA Requests, E-Mail to Repollet, Mailing Paper Copy.	S.D.	150.00	.40	\$60.00
8/1/2019	Further attention to fact gathering seeking publicly available information.	J.D.R.	690.00	2.00	\$1,380.00
8/2/2019	Correspondence re: reasrch for prelim. injunction	L.Q.	500.00	.10	\$50.00
8/5/2019	Call from John, Sending Doodle Poll to All Counsel re Availability for Conference Call re Motion to Dismiss.	S.D.	150.00	.30	\$45.00
8/5/2019	Review AG Motion to Dismiss and correspondence	L.Q.	500.00	.40	\$200.00

8/5/2019	Review of emails.	S.Q.E.	500.00	.60	\$300.00
8/5/2019	Attention to defendant preliminary motion to dismiss; initial strategy for response; attention to strategy for preliminary injunction.	J.D.R.	690.00	6.00	\$4,140.00
8/6/2019	Attention to strategy for handling	D.S.	550.00	.20	\$110.00
8/6/2019	Review NJDOE bulletins/corrective action; summarize cases re: prelim injunction	L.Q.	500.00	.50	\$250.00
8/6/2019	Review/attention to emails.	S.Q.E.	500.00	.50	\$250.00
8/6/2019	Draft adjournment request; finalize/file same	D.S.	550.00	.60	\$330.00
8/6/2019	Further attention to review and analysis of defendant preliminary motion to dismiss; coordination with co-counsel conference call; legal research.	J.D.R.	690.00	4.50	\$3,105.00
8/6/2019	Legal research; drafting motion for preliminary injunction.	J.D.R.	690.00	9.30	\$6,417.00
8/7/2019	Review/Format/Upload Class Action Docket Entries, Updating Calendar/Case Tracking.	S.D.	150.00	.40	\$60.00
8/7/2019	Email review.	S.Q.E.	500.00	.30	\$150.00
8/7/2019	Communication with potential Amici.	J.D.R.	690.00	1.30	\$897.00
8/8/2019	Review of emails regarding non-profit participation in upcoming email.	S.Q.E.	500.00	.20	\$100.00

8/8/2019	Team coordination strategy; attention to joint prosecution agreement and amicus participation.	J.D.R.	690.00	1.50	\$1,035.00
8/12/2019	Further attention to joint prosecution agreement.	J.D.R.	690.00	.80	\$552.00
8/13/2019	Determining Availability of Counsel for Conference Call re NJDOE OPRA.	S.D.	150.00	.40	\$60.00
8/13/2019	Review case law LG sent to team	L.Q.	500.00	.50	\$250.00
8/13/2019	Prep for 12:30 call; review MTD brief	D.S.	550.00	.50	\$275.00
8/13/2019	Attention to conference call for class action; type notes re same and email to JR and DS; gather briefs from ELC website and circulate among group	L.G.	200.00	1.60	\$320.00
8/13/2019	Class action status group call.	S.Q.E.	500.00	1.00	\$500.00
8/13/2019	Continue preparation for call; conference call with team; follow-up re: same	D.S.	550.00	2.00	\$1,100.00
8/13/2019	Legal research re MTD & PI motion; call with PSC; preparation for and follow-up to same.	J.D.R.	690.00	2.30	\$1,587.00
8/14/2019	Review of DOE motion.	S.Q.E.	500.00	.60	\$300.00
8/14/2019	Further attention to fact gathering from public records.	J.D.R.	690.00	1.10	\$759.00
8/15/2019	Attention to pre-discovery fact gathering.	J.D.R.	690.00	1.50	\$1,035.00



8/16/2019	Email review/Three Rivers Ctr. for Indep. Living, Inc. case.	S.Q.E.	500.00	.40	\$200.00
8/16/2019	Attention to consideration of appropriate plaintiffs.	J.D.R.	690.00	.50	\$345.00
8/19/2019	Legal research re preliminary injunction.	J.D.R.	690.00	2.50	\$1,725.00
8/20/2019	Review correspondence with counsel and clients	L.Q.	500.00	.40	\$200.00
8/20/2019	Attention to reading NJ DOE's motion to dismiss; attention to reading JT v. Dumont case; attention to drafting engagement agreement for Lateefah Gilliam; email to same requesting address	L.G.	200.00	2.00	\$400.00
8/20/2019	Attention to engaging new named plaintiff; further attention to opposition motion to dismiss; legal research re same; coordination with co-counsel re same; client communication seeking to confirm allegations in complaint.	J.D.R.	690.00	3.80	\$2,622.00
8/21/2019	Attention to email from new client Lateefah Gilliam; attention to updating engagement agreement; emailing same to client for signature; email to Esther Canty-Barnes requesting documents; attention to reviewing client documents	L.G.	200.00	1.50	\$300.00
8/21/2019	Telephone conference with named plaintiff, C.P.; preparation and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
8/22/2019	Telephone conference	D.S.	550.00	.20	\$110.00
8/22/2019	Emails.	S.Q.E.	500.00	.30	\$150.00
8/22/2019	Attend to strategy for handling case and using OPRA for fact gathering	D.S.	550.00	.40	\$220.00

8/22/2019	Review NJDOE response to RThurston complaint; correspondence with counsel	L.Q.	500.00	.50	\$250.00
8/22/2019	Attention to gathering client info for contact list; attention to reading caselaw	L.G.	200.00	2.50	\$500.00
8/22/2019	Legal research; drafting amended complaint; communications with co-counsel.	J.D.R.	690.00	6.60	\$4,554.00
8/23/2019	Briefly review changes in First Amended Complaint	D.S.	550.00	.30	\$165.00
8/23/2019	attention to strategy re complaint amendments	K.H.	550.00	.40	\$220.00
8/23/2019	Attention to conference call re amended complaint; phone calls re new plaintiff Lateefah Gilliam	L.G.	200.00	1.00	\$200.00
8/23/2019	Participate in team conference call	D.S.	550.00	.80	\$440.00
8/23/2019	group phone conference re amended complaint, attention to potential client engagement agreement, contact with potential client, emails regarding same, review of file for entry of information in amended complaint (re potential client).	S.Q.E.	500.00	2.30	\$1,150.00
8/23/2019	Further communication with named plaintiffs, C.P. and A.S.; further attention to amending complaint; all-hands conference call with co-counsel; preparation and follow-up to same.	J.D.R.	690.00	4.50	\$3,105.00
8/24/2019	Drafting letter to Judge Williams; legal research re same.	J.D.R.	690.00	2.20	\$1,518.00
8/26/2019	Emails and attention to NJDOE OPRA request response due date, docket review.	S.Q.E.	500.00	.40	\$200.00

8/26/2019	Attention to legal research re when procedural violation constitutes FAPE; attention to reading amended complaint; attention to reading letter to court re same and motion	L.G.	200.00	3.00	\$600.00
8/26/2019	Attendance at bar association meeting to gather facts by presentation by OAL; attention to co-counsel agreement; pre-meeting strategy session with co-counsel.	J.D.R.	690.00	5.90	\$4,071.00
8/27/2019	Review/Format/Upload Docket Entries.	S.D.	150.00	.10	\$15.00
8/27/2019	Attention to strategy regarding future OPRA request to the DOE and emails regarding the same, initial drafting of aforementioned request, review of amended complaint, attention to transcribing School Law Committee meeting held on 8/26/19.	S.Q.E.	500.00	1.30	\$650.00
8/27/2019	Attention to legal research	L.G.	200.00	3.50	\$700.00
8/28/2019	Legal research	L.G.	200.00	3.50	\$700.00
8/28/2019	Attention to potential transcription services, attempt to transcribe audio from school law committee meeting on 8/26/19.	S.Q.E.	500.00	1.60	\$800.00
8/28/2019	Responding to press inquires; lunch meeting with reporter.	J.D.R.	690.00	2.50	\$1,725.00
8/29/2019	Review of correspondence re: school law meeting; IHO request and updated PRISE manual	L.Q.	500.00	.30	\$150.00
8/29/2019	Attention to potential OPRA request for new PRISE regulations, emails, attention to audio transcription.	S.Q.E.	500.00	1.00	\$500.00
8/29/2019	Communication with counsel for J.A.; attention DOE IHO RFQ.	J.D.R.	690.00	.80	\$552.00

8/29/2019	Attention to re-reading caselaw and drafting summaries of each	L.G.	200.00	3.00	\$600.00
9/5/2019	Adding Case on DNJ ECF to John's Account.	S.D.	150.00	.10	\$15.00
9/5/2019	Getting Signatures re Class Action Agreement Between Plaintiff's Counsel.	S.D.	150.00	.20	\$30.00
9/6/2019	Formatting/Adding Giles's Signature re Fee Agreement.	S.D.	150.00	.10	\$15.00
9/6/2019	Review/Format/Upload Docket entry.	S.D.	150.00	.10	\$15.00
9/6/2019	Review/Format/Upload Text Order, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
9/13/2019	Review R. Thurston correspondence with attachments	L.Q.	500.00	.10	\$50.00
9/19/2019	Review/Format/Upload Docket Entry re Class Action.	S.D.	150.00	.10	\$15.00
9/19/2019	Research and email regarding NJ FOIA complaint against US DOE.	S.Q.E.	500.00	.40	\$200.00
9/23/2019	Review/Format/Upload Docket Entry.	S.D.	150.00	.10	\$15.00
9/23/2019	Review of emails/attachments.	S.Q.E.	500.00	.20	\$100.00
9/23/2019	Attention to reading OSEP memo re dispute resolution	L.G.	200.00	.80	\$160.00

9/24/2019	Attention to reading OSEP memo re dispute resolution	L.G.	200.00	.30	\$60.00
9/25/2019	Call to Dwyer re Class Counsel Agreement Signature.	S.D.	150.00	.10	\$15.00
9/27/2019	Scanning/Filing Documents for John.	S.D.	150.00	.20	\$30.00
10/2/2019	Call to Dwyer re Signature on Class Counsel Agreement.	S.D.	150.00	.10	\$15.00
10/7/2019	Attention to reading Thurston letter to DOE re delay	L.G.	200.00	.20	\$40.00
10/7/2019	Attention to correspondence from RThurston re: lno decision by ALJ	L.Q.	500.00	.10	\$50.00
10/7/2019	Confer re: strategy for filing response to MTD	D.S.	550.00	.10	\$55.00
10/7/2019	Confer re: strategy for Motion for Preliminary Injunction	D.S.	550.00	.10	\$55.00
10/7/2019	Attention to emails.	S.Q.E.	500.00	.20	\$100.00
10/7/2019	Review/revise draft cert of service and service letter; instruct paralegal re: filing/service of same	D.S.	550.00	.60	\$330.00
10/7/2019	Legal research and drafting brief in support of class certification.	J.D.R.	690.00	2.20	\$1,518.00
10/7/2019	Legal research and drafting brief in support of preliminary injunction.	J.D.R.	690.00	6.50	\$4,485.00

10/8/2019	Legal research and drafting brief in support of class certification.	J.D.R.	690.00	4.50	\$3,105.00
10/9/2019	attention to correspondence among counsel	L.Q.	500.00	.10	\$50.00
10/9/2019	Email review, calendaring,	S.Q.E.	500.00	.30	\$150.00
10/9/2019	Attention to strategy for briefing of preliminary injunction and class certification motions	D.S.	550.00	.30	\$165.00
10/9/2019	Further attention to PI brief and class cert brief; detailed communications with co-counsel re litigation strategy; detailed communications with potential amici.	J.D.R.	690.00	4.50	\$3,105.00
10/10/2019	Compiling Additional Athos Signature re Joint Prosecution Agreement, Sending to All Counsel.	S.D.	150.00	.10	\$15.00
10/10/2019	Review/Format/Upload Docket Entry.	S.D.	150.00	.10	\$15.00
10/10/2019	Compiling Signatures re Fee Agreement.	S.D.	150.00	.20	\$30.00
10/10/2019	Attention to emails.	S.Q.E.	500.00	.30	\$150.00
10/10/2019	Sending Signed Fee Agreement to All Class Counsel, Working on Compiling Joint Prosecution Agreements Signatures, Call to Athos re Signature (left message), Call to Reisman re Signature/Sending Copy for Signature, Compiling Signatures cont., Sending Copy to All Counsel.	S.D.	150.00	1.30	\$195.00
10/15/2019	Review of emails.	S.Q.E.	500.00	.40	\$200.00

10/15/2019	Attention to correspondence; Review motions to certify class and PI	L.Q.	500.00	.50	\$250.00
10/16/2019	Review/Format/Upload Docket Entries, Updating Calendar.	S.D.	150.00	.30	\$45.00
10/16/2019	Review of docket entries.	S.Q.E.	500.00	.30	\$150.00
10/16/2019	Attention to reading NJDOE's motion to dismiss	L.G.	200.00	1.00	\$200.00
10/17/2019	Emails regarding conference call regarding motions on 10/17/19 at 2 pm.	S.Q.E.	500.00	.30	\$150.00
10/17/2019	Team Conference call	D.S.	550.00	.50	\$275.00
10/17/2019	Draft proposed stip and order extending time, and analysis of strategy regarding same	D.S.	550.00	.80	\$440.00
10/17/2019	Attention to reading draft brief in support of class certification; attention to reading draft brief for preliminary relief; attention to conference call re class action; post conference call discussion with JR and DS	L.G.	200.00	2.50	\$500.00
10/17/2019	Review draft briefs in preparation for team conference call	D.S.	550.00	1.00	\$550.00
10/21/2019	Re of revisions of PI motion/emails.	S.Q.E.	500.00	.70	\$350.00
10/21/2019	Further attention to legal research and briefing class certification brief; call with co-counsel re same.	J.D.R.	690.00	5.50	\$3,795.00

10/21/2019	Further attention to legal research and briefing preliminary injunction brief; call with co-counsel re same.	J.D.R.	690.00	6.20	\$4,278.00
10/22/2019	Attention to Certifications of Class Counsel.	S.D.	150.00	.10	\$15.00
10/22/2019	Working on Certifications re Class Counsel for John.	S.D.	150.00	.20	\$30.00
10/22/2019	Review of emails.	S.Q.E.	500.00	.40	\$200.00
10/22/2019	Attention to emails between co-counsel re federal days; attention to reading caselaw re class certification requirements	L.G.	200.00	3.10	\$620.00
10/22/2019	Prepare adjournment request for MTD; review/revise draft brief in support of motion for class certification	D.S.	550.00	1.90	\$1,045.00
10/22/2019	Further attention to legal research and briefing class certification brief, including identifying and gathering exhibits.	J.D.R.	690.00	3.30	\$2,277.00
10/22/2019	Further attention to legal research and briefing PI brief, including identifying and gathering exhibits.	J.D.R.	690.00	4.50	\$3,105.00
10/23/2019	Working on Certifications re Class Counsel.	S.D.	150.00	.20	\$30.00
10/23/2019	Working on Certifications of Class Counsel cont.	S.D.	150.00	.20	\$30.00
10/23/2019	Review/Format/Upload Docket Entries, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
10/23/2019	Uploading CVs re Class Counsel, Updating Certifications.	S.D.	150.00	.30	\$45.00



10/23/2019	Docket review re MTD (12/2/19 return date).	S.Q.E.	500.00	.10	\$50.00
10/23/2019	Working on Certifications re Class Counsel cont.	S.D.	150.00	.50	\$75.00
10/23/2019	Review emails from co-counsel	D.S.	550.00	.20	\$110.00
10/24/2019	Uploading Class Counsel CVs.	S.D.	150.00	.10	\$15.00
10/24/2019	Uploading Class Counsel CV, Updating Certification.	S.D.	150.00	.10	\$15.00
10/24/2019	Uploading Class Counsel CV, Updating Certification.	S.D.	150.00	.20	\$30.00
10/24/2019	Working on Class Counsel Certifications.	S.D.	150.00	.40	\$60.00
10/24/2019	Attention to reading caselaw re class certification and preliminary injunction requirements	L.G.	200.00	3.50	\$700.00
10/24/2019	Draft/revise various co-counsel certifications to include additional information; review/revise draft brief in support of preliminary injunction and brief in support of motion for class certification	D.S.	550.00	4.70	\$2,585.00
10/25/2019	Sending Requested Class Action Documents to Valverde.	S.D.	150.00	.10	\$15.00
10/25/2019	Sending Class Action Docket Report to Valverde for John.	S.D.	150.00	.20	\$30.00

10/25/2019	Sending Documents to Valverde cont.	S.D.	150.00	.20	\$30.00
10/25/2019	Review of emails/review of motion and docket.	S.Q.E.	500.00	.70	\$350.00
10/25/2019	Attention to drafting notice of motion and proposed order for the class certification brief; attention to drafting notice of motion and proposed order for preliminary injunction brief; emails re amicus; attention to reading caselaw relevant to opposition to NJDOE's motion to dismiss	L.G.	200.00	2.50	\$500.00
10/25/2019	Work on motion for preliminary injunction and motion for class certification throughout day, including communication with co-counsel, drafting/revising supporting certifications, drafting sections of briefs, reviewing/revising Notices of Motion, reviewing/revising proposed Order; finalize and file all documents	D.S.	550.00	12.90	\$7,095.00
10/28/2019	Sending copies of Motions to Thurston for John.	S.D.	150.00	.10	\$15.00
10/28/2019	Review/Format/Upload Additional Docket Entries, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
10/28/2019	Attention to email re amicus solicitation letter; attention to reading letter	L.G.	200.00	.20	\$40.00
10/28/2019	Attention to correspondence from amicus and court notices	L.Q.	500.00	.10	\$50.00
10/28/2019	Sending Copy of Motions to Non-Profits/Class Counsel, Adding Reisman/Valverde to John's Speed Dial.	S.D.	150.00	.50	\$75.00
10/28/2019	Review/Format/Upload Docket Entries, Updating Calendar/Case Tracking.	S.D.	150.00	.70	\$105.00

10/28/2019	Preparing CC of Motions to Judge Hillman, Passing to Anne for Shipment.	S.D.	150.00	.90	\$135.00
10/28/2019	Docket review/review of latest filings.	S.Q.E.	500.00	.40	\$200.00
10/28/2019	Attention to coordinating amicus; attention to motion to dismiss.	J.D.R.	690.00	2.50	\$1,725.00
10/29/2019	Review/Format/Upload Docket Entry re Class Action, Fwd to Counsel/Non-Profits.	S.D.	150.00	.20	\$30.00
10/29/2019	Call from John, Pulling Thurston Briefs re Motion to Dismiss from PACER, Formatting/Uploading.	S.D.	150.00	.40	\$60.00
10/29/2019	Docket review.	S.Q.E.	500.00	.30	\$150.00
10/29/2019	Attention to reviewing motion to dismiss; attention to coordination of amicus efforts.	J.D.R.	690.00	5.50	\$3,795.00
10/30/2019	Review/Format/Upload Docket Entries, Fwd to Class Counsel/Non-Profits.	S.D.	150.00	.50	\$75.00
10/30/2019	Docket review.	S.Q.E.	500.00	.20	\$100.00
10/30/2019	Review/revise draft letter to Judge Hillman	D.S.	550.00	.20	\$110.00
10/30/2019	Letter to Judge Hillman responding to DOE request for adjournment.	J.D.R.	690.00	.80	\$552.00
10/30/2019	Attention to opposition to motion to dismiss.	J.D.R.	690.00	3.30	\$2,277.00

10/31/2019	Updating Calendar/Case Tracking re Motion Adjournment.	S.D.	150.00	.10	\$15.00
10/31/2019	Fwd Docket Notice re Adjournment to Counsel/Non-Profits, Creating Doodle Poll re Clients for Saran, E-mail to Giles/O'Leary re Client Contact Information.	S.D.	150.00	.60	\$90.00
10/31/2019	Attend to updates to schedule and impact on briefing assignments and strategy in light of new docket entries	D.S.	550.00	.30	\$165.00
10/31/2019	Call with John regarding doodle poll for pending call with plaintiffs/emails, calls regarding same.	S.Q.E.	500.00	.60	\$300.00
10/31/2019	Attention to reading caselaw for opposition to motion to dismiss	L.G.	200.00	2.00	\$400.00
10/31/2019	Drafting letter to Judge Hillman.	J.D.R.	690.00	1.00	\$690.00
10/31/2019	Coordination with co-counsel; coordination with counsel to amici.	J.D.R.	690.00	1.50	\$1,035.00
10/31/2019	Further attention to legal research and drafting opposition to motion to dismiss.	J.D.R.	690.00	4.50	\$3,105.00
11/1/2019	Call to Giles re Class Action Clients.	S.D.	150.00	.10	\$15.00
11/1/2019	E-Mail to John re Class Action Client Contacts.	S.D.	150.00	.10	\$15.00
11/1/2019	Attention to reading caselaw for opposition for motion to dismiss	L.G.	200.00	1.50	\$300.00
11/3/2019	Review of documents from WW-Plainsboro matter	L.Q.	500.00	.30	\$150.00

11/3/2019	Attention to emails/final judgment review.	S.Q.E.	500.00	.80	\$400.00
11/4/2019	Attention to reading caselaw for motion to dismiss	L.G.	200.00	.70	\$140.00
11/6/2019	Attention to reading caselaw for motion to dismiss	L.G.	200.00	2.00	\$400.00
11/7/2019	E-Mail to John re Status Call.	S.D.	150.00	.10	\$15.00
11/7/2019	Review of emails.	S.Q.E.	500.00	.50	\$250.00
11/8/2019	Call with J.R. regarding strategy.	W.I.P.	500.00	.20	\$100.00
11/9/2019	Attention to drafting opposition to MtD.	J.D.R.	690.00	1.50	\$1,035.00
11/10/2019	Attention to breifing opposition to motion to dismiss.	J.D.R.	690.00	3.30	\$2,277.00
11/11/2019	Review/Format/Upload Docket Entries.	S.D.	150.00	.20	\$30.00
11/11/2019	Docket review/review of correspondence.	S.Q.E.	500.00	.40	\$200.00
11/11/2019	Attention to breifing opposition to motion to dismiss.	J.D.R.	690.00	4.90	\$3,381.00
11/12/2019	Working on Confidentiality Agreement cont.	S.D.	150.00	.10	\$15.00

11/12/2019	Adapting Confidentiality Agreement for DRNJ Use.	S.D.	150.00	.20	\$30.00
11/12/2019	Exchange emails re: procedural issues	D.S.	550.00	.10	\$55.00
11/12/2019	Searching for DRNJ Confidentiality Agreement.	S.D.	150.00	.60	\$90.00
11/12/2019	Review docket entry re: granting motion of amicus party; emails and correspondence re: same	D.S.	550.00	.20	\$110.00
11/12/2019	Attention to reading JR draft of brief in opposition to motion to dismiss	L.G.	200.00	.70	\$140.00
11/12/2019	Review of Opposition to Dismiss and amended complaint	L.Q.	500.00	.40	\$200.00
11/12/2019	Emails.	S.Q.E.	500.00	.50	\$250.00
11/12/2019	Attention to case issues & review of opposition to motion to dismiss	K.H.	550.00	.70	\$385.00
11/13/2019	Review/Format/Upload DRNJ Signed Confidentiality Agreement.	S.D.	150.00	.10	\$15.00
11/13/2019	Review/Format/Upload Docket Notice/Entry, Updating Calendar/Case Tracking, Fwd to Counsel/Non-Profits.	S.D.	150.00	.30	\$45.00
11/13/2019	Attention to comments from counsel and revised opposition brief	L.Q.	500.00	.30	\$150.00
11/13/2019	Emails.	S.Q.E.	500.00	.40	\$200.00

11/14/2019	Call to Giles Office re Schedule Call w John (no answer).	S.D.	150.00	.10	\$15.00
11/14/2019	Docket review.	S.Q.E.	500.00	.10	\$50.00
11/14/2019	Docket review.	S.Q.E.	500.00	.20	\$100.00
11/14/2019	Attention to reviewing comments on draft in opposition to motion to dismiss; email correspondence re same	L.G.	200.00	.60	\$120.00
11/15/2019	Docket review.	S.Q.E.	500.00	.70	\$350.00
11/18/2019	Preparing Copies of Opposition Briefs for John, Review/Format/Upload Docket Entries.	S.D.	150.00	.20	\$30.00
11/18/2019	Drafting Certification of Service re Motion to Dismiss Opposition.	S.D.	150.00	.50	\$75.00
11/18/2019	Docket review.	S.Q.E.	500.00	.40	\$200.00
11/18/2019	Attention to review of opposition papers filed by NJDOE; FOIA filed by. R. Thurston; tasks required to complete filing	L.Q.	500.00	.50	\$250.00
11/18/2019	Citation research for brief filing.	S.Q.E.	500.00	.50	\$250.00
11/18/2019	Attention to proofreading and drafting TOC and TOA for opposition papers	L.G.	200.00	3.00	\$600.00
11/18/2019	Attend to adjournment request	D.S.	550.00	1.70	\$935.00

11/19/2019	Email review.	S.Q.E.	500.00	.10	\$50.00
11/19/2019	Preparing/Sending CC of Brief to Judge Hillman, Review/Format/Upload Docket Entries.	S.D.	150.00	1.20	\$180.00
11/19/2019	Call and follow-up	D.S.	550.00	.50	\$275.00
11/20/2019	Review/Format/Upload Docket Notice.	S.D.	150.00	.10	\$15.00
11/20/2019	Attention to email correspondence re motion briefs and amici; attention to letter from amici requesting oral argument	L.G.	200.00	.50	\$100.00
11/22/2019	Attend to strategy for reply brief on class cert motion	D.S.	550.00	.20	\$110.00
11/22/2019	Circulate draft reply brief to team for comment	D.S.	550.00	.20	\$110.00
11/22/2019	Attention to emails re draft reply brief; attention to reading reply brief	L.G.	200.00	.70	\$140.00
11/22/2019	Attention to draft reply brief	L.Q.	500.00	.30	\$150.00
11/25/2019	Review/Format/Upload Docket Entries re Class Action.	S.D.	150.00	.10	\$15.00
11/25/2019	Review/Format/Upload Docket Entries cont.	S.D.	150.00	.20	\$30.00
11/25/2019	Drafting Certification of Service re Letter Brief, Sending to Don, Uploading.	S.D.	150.00	.20	\$30.00



11/25/2019	Review/Format/Upload Docket Entries/Notices.	S.D.	150.00	.30	\$45.00
11/25/2019	Emails re: reply briefs; finalize reply brief for class certification motion and attention to filing same	D.S.	550.00	1.20	\$660.00
11/25/2019	Finalize/file reply brief; draft letter in response to DAG's letters and circulate same for internal review	D.S.	550.00	2.60	\$1,430.00
11/26/2019	Review/Upload Correspondence.	S.D.	150.00	.10	\$15.00
11/26/2019	Review/Upload Docket Entries.	S.D.	150.00	.30	\$45.00
11/26/2019	Mail courtesy copy to Judge via NJLS mailbox.	A.R.	150.00	.50	\$75.00
11/26/2019	Provide instructions re: service of Courtesy Copies	D.S.	550.00	.20	\$110.00
11/26/2019	Review/respond to email from counsel	D.S.	550.00	.20	\$110.00
11/26/2019	Courtesy copy to Judge.	A.R.	150.00	1.60	\$240.00
11/27/2019	Review/Upload Docket Entry, Updating Case Tracking/Calendar.	S.D.	150.00	.20	\$30.00
11/27/2019	Trial binder preparation.	A.R.	150.00	.30	\$45.00
11/27/2019	Review docket notice and download Order; internal emails re: same	D.S.	550.00	.20	\$110.00

11/27/2019	Trial binder preparation.	A.R.	150.00	2.30	\$345.00
12/2/2019	Attention to correspondence re: NY 45 day rule violations	L.Q.	500.00	.10	\$50.00
12/2/2019	Emails/doc review.	S.Q.E.	500.00	.50	\$250.00
12/4/2019	Attention to court notice re joint stipulation of briefing schedule; attention to reading same	L.G.	200.00	.20	\$40.00
12/4/2019	Attention to joint letter re case management, per court order.	J.D.R.	690.00	2.20	\$1,518.00
12/4/2019	Attention to negotiation and drafting joint letter to the Court.	J.D.R.	690.00	2.20	\$1,518.00
12/5/2019	Attention to correspondence re: ALJ Beaver-James	L.Q.	500.00	.10	\$50.00
12/6/2019	Review/Format/Upload Docket Entry.	S.D.	150.00	.10	\$15.00
12/6/2019	Sending Briefs to Of-Counsel Feldman.	S.D.	150.00	.20	\$30.00
12/9/2019	Review correspondence from committee member	L.Q.	500.00	.10	\$50.00
12/9/2019	Attention to email from R. Thurston encl. supplemental declaration; attention to reading supplemental declaration	L.G.	200.00	.50	\$100.00
12/9/2019	Review letter to State Senate from R. Thurston; attention to same	D.S.	550.00	.20	\$110.00

12/9/2019	Email review.	S.Q.E.	500.00	.40	\$200.00
12/11/2019	Review/Format/Upload Text Order, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
12/16/2019	Docket review.	S.Q.E.	500.00	.10	\$50.00
12/18/2019	Emails regarding oral arguments on 12/20 contact with judge's chambers regardings same.	S.Q.E.	500.00	.50	\$250.00
12/19/2019	Attention to correspondence from committee member	L.Q.	500.00	.10	\$50.00
12/19/2019	Docket review/emails, docs regarding ALJ.	S.Q.E.	500.00	.60	\$300.00
1/3/2020	Review/Format/Upload Docket Entries, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
1/6/2020	Attention to request from committee counsel	L.Q.	500.00	.10	\$50.00
1/7/2020	Attention to DNJ regarding FAPE/emails/meeting regarding same/attention to best practices for parents going forward.	S.Q.E.	500.00	.90	\$450.00
1/8/2020	Review/Format/Upload Docket Entry.	S.D.	150.00	.10	\$15.00
1/8/2020	Attention to best practices.	S.Q.E.	500.00	.30	\$150.00
1/9/2020	Checking Cases re FAPE Claims cont., E-Mail to Saran.	S.D.	150.00	.50	\$75.00

1/9/2020	Checking Education Cases re FAPE Claims for Saran.	S.D.	150.00	1.60	\$240.00
1/9/2020	Research of cases and DPPs alleging denial of FAPE.	S.Q.E.	500.00	.60	\$300.00
1/10/2020	Call with J.R. regarding status of matter.	W.I.P.	500.00	.20	\$100.00
1/16/2020	Review/Format/Upload Docket Entry.	S.D.	150.00	.20	\$30.00
1/16/2020	Review/Format/Upload Text Order re Adjournment, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
1/16/2020	Docket review.	S.Q.E.	500.00	.10	\$50.00
1/17/2020	Attention to current cases alleging denial of FAPE/emails regarding same.	S.Q.E.	500.00	.80	\$400.00
1/20/2020	Final review of submission of cases involving FAPE.	S.Q.E.	500.00	.70	\$350.00
1/21/2020	Preliminary attention to Proposed Guidelines.	J.D.R.	690.00	2.20	\$1,518.00
1/21/2020	Call with co-counsel re possible TRO; preparation for and follow-up to same; preliminary research.	J.D.R.	690.00	3.50	\$2,415.00
1/22/2020	Further attention to legal research and drafting re TRO.	J.D.R.	690.00	3.50	\$2,415.00
1/24/2020	Updating Docket Report.	S.D.	150.00	.20	\$30.00

1/24/2020	Legal research re TRO/PI motion; drafting same; letter to court re same.	J.D.R.	690.00	7.80	\$5,382.00
1/26/2020	Further attention to drafting brief in support of TRO / PI.	J.D.R.	690.00	3.30	\$2,277.00
1/27/2020	Fwd Docket Entry to Pollock.	S.D.	150.00	.10	\$15.00
1/27/2020	Review/Format/Upload Docket Entry.	S.D.	150.00	.20	\$30.00
1/27/2020	Further attention to PI/TRO brief	J.D.R.	690.00	2.50	\$1,725.00
1/28/2020	Review/Format/Upload Text Order, Fwd to Pollock.	S.D.	150.00	.20	\$30.00
1/28/2020	Emails/docket review/attention to OPRA request.	S.Q.E.	500.00	.70	\$350.00
1/29/2020	Preparing Motion for Shipment.	S.D.	150.00	.10	\$15.00
1/29/2020	Preparing CC of TRO Brief for Judge Hillman, Review/Format/Upload Docket Entry.	S.D.	150.00	1.00	\$150.00
1/29/2020	Drafting on Table of Authorities re Preliminary Injunction Motion.	S.D.	150.00	1.30	\$195.00
1/29/2020	Drafting Table of Authorities cont.	S.D.	150.00	1.40	\$210.00
1/29/2020	Attention to 1/28/20 OPRA request/emails regarding same.	S.Q.E.	500.00	1.00	\$500.00

1/30/2020	Preparing/Sending Copy of Filing to NJDOE, CC via E-Mail.	S.D.	150.00	.90	\$135.00
1/30/2020	Attention to emails.	S.Q.E.	500.00	.40	\$200.00
1/31/2020	Attention to emails.	S.Q.E.	500.00	.30	\$150.00
1/31/2020	Attention to email correspondence re amici research	L.G.	200.00	.90	\$180.00
2/3/2020	Review/Format/Upload Docket Entries/Notices, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
2/3/2020	Attend to strategy for pre-Answer discovery	D.S.	550.00	.70	\$385.00
2/3/2020	attention to discovery issue re inter agency memo, legal research re same	J.D.R.	690.00	3.50	\$2,415.00
2/4/2020	Legal reasearch and drafting re pending motion for PI.	J.D.R.	690.00	2.50	\$1,725.00
2/7/2020	Review/Format/Upload Docket Entries, CC to Pollock.	S.D.	150.00	.40	\$60.00
2/10/2020	Review/Format/Upload Correspondence re Opposition to PI Motion.	S.D.	150.00	.10	\$15.00
2/10/2020	Attention to filing by Aimee Brenner	L.Q.	500.00	.20	\$100.00
2/11/2020	Review brief in opposition to second motion for preliminary injunction and attend to strategy for reply papers	D.S.	550.00	1.30	\$715.00

2/12/2020	Review/Format Docket Entry, Fwd to Pollock.	S.D.	150.00	.20	\$30.00
2/12/2020	Strategy and hearing prep.	J.D.R.	690.00	2.20	\$1,518.00
2/12/2020	Work on reply brief; instruct A. Roque re: assignment regarding documents in opposition papers identified by links to on-line documents; attention to review some	D.S.	550.00	4.50	\$2,475.00
2/13/2020	Work on Reply Brief	D.S.	550.00	3.90	\$2,145.00
2/13/2020	Complete intermediate draft of insert re: ripeness; combine sections of brief and adjust for flow, etc.; review/revise draft brief and circulate for internal review	D.S.	550.00	4.20	\$2,310.00
2/14/2020	Finalize intermediate draft of brief and circulate for team review	D.S.	550.00	.90	\$495.00
2/14/2020	Drafted and sent emails to reporters regarding February 18 hearing.	W.I.P.	500.00	1.60	\$800.00
2/14/2020	Revise/finalize reply papers and attend to filing/service of same	D.S.	550.00	2.40	\$1,320.00
2/15/2020	Legal research and hearing prep.	J.D.R.	690.00	2.50	\$1,725.00
2/16/2020	Legal research and hearing prep.	J.D.R.	690.00	3.30	\$2,277.00
2/17/2020	Call and emails with reporter from NJ Spotlight regarding the February 18 hearing.	W.I.P.	500.00	.30	\$150.00
2/17/2020	Review/Format/Upload Docket Entry re Reply Brief to Opposition re Second Preliminary Injunction Motion, Fwd to Pollock, Preparing CC to Court, Shipping at PostNet, Return to	S.D.	150.00	1.60	\$240.00

Office.					
2/17/2020	Prepare for Oral Argument	D.S.	550.00	2.00	\$1,100.00
2/17/2020	Prepare for Oral Argument	D.S.	550.00	3.70	\$2,035.00
2/17/2020	Legal research and hearing prep; travel to Camden.	J.D.R.	690.00	6.50	\$4,485.00
2/18/2020	Preparation for Court hearing on motions to dismiss, class certification, and preliminary injunctions.	K.W.	250.00	2.00	\$500.00
2/18/2020	Prepare for Oral Argument	D.S.	550.00	1.00	\$550.00
2/18/2020	Attend Court hearing on motions to dismiss, class certification, and preliminary injunctions in Camden, NJ, and related travel; pre-hearing meeting with team; record impressions of hearing and convey same to attorney team.	K.W.	250.00	6.00	\$1,500.00
2/18/2020	Pre-argument Team Meeting in Haddonfield, NJ and related travel	D.S.	550.00	4.00	\$2,200.00
2/18/2020	Travel to/from, and attendance at, court hearing.	W.I.P.	500.00	5.90	\$2,950.00
2/18/2020	Participate in oral argument on motion to dismiss, motion for class certification, and first and second motions for preliminary injunction in Camden, NJ and related travel	D.S.	550.00	7.70	\$4,235.00
2/18/2020	Preparation for hearing; attending same; travel back from Camden.	J.D.R.	690.00	12.50	\$8,625.00



2/19/2020	Attention to action items (Doe matter) for amended complaint	L.Q.	500.00	.20	\$100.00
2/19/2020	Phone call from C. Reisman	D.S.	550.00	.20	\$110.00
2/19/2020	Attend to request from co-counsel for document	D.S.	550.00	.30	\$165.00
2/19/2020	Team call and follow up re: same	D.S.	550.00	.70	\$385.00
2/19/2020	Attention Class Action re litigation strategy.	K.W.	250.00	2.00	\$500.00
2/20/2020	Attention Class Action re federal monitor.	K.W.	250.00	.50	\$125.00
2/20/2020	Attention to debrief of 2/18 hearing actions items needed for amended complaint	L.Q.	500.00	.70	\$350.00
2/21/2020	Status update re: proposed guidelines and expected discovery	L.Q.	500.00	.20	\$100.00
2/21/2020	Review docket notices and attend to same; review email from co-counsel	D.S.	550.00	.30	\$165.00
2/21/2020	Further attention to fact gathering.	J.D.R.	690.00	2.20	\$1,518.00
2/21/2020	Legal research and strategy re amended complaint; attention to drafting same.	J.D.R.	690.00	4.50	\$3,105.00
2/22/2020	Legal research and strategy re amended complaint; attention to drafting same.	J.D.R.	690.00	2.50	\$1,725.00

2/23/2020	Attention to issues re federal monitor candidates.	J.D.R.	690.00	2.20	\$1,518.00
2/24/2020	Review/Format/Upload Docket Entries re Hearing Transcript, Fwd to Pollock, Updating Calendar/Case Tracking/Trial Calendar re Hearing Continuation.	S.D.	150.00	.30	\$45.00
2/24/2020	Review draft letter to Judge Hillman; respond to emails re: same	D.S.	550.00	.60	\$330.00
2/24/2020	Drafting and revising letter to Judge Hillman; further attention to amended complaint; further attention to fact gathering (including call with Judge Jacobson)	J.D.R.	690.00	6.40	\$4,416.00
2/25/2020	Attention to question on Doe matter and revised second amended complaint	L.Q.	500.00	.30	\$150.00
2/25/2020	Attention to gathering info for procedural history re plaintiffs; call with Catherine Reisman re complaint; emails re complaint	L.G.	200.00	2.50	\$500.00
2/25/2020	Further attention to amended complaint and supporting brief.	J.D.R.	690.00	8.60	\$5,934.00
2/26/2020	Preparing Certified Letter to Soranno.	S.D.	150.00	.20	\$30.00
2/26/2020	Attention to second amended complaint and correspondence with opposing counsel	L.Q.	500.00	.60	\$300.00
2/26/2020	Review of emails/correspondence re. amended complaint.	S.Q.E.	500.00	.60	\$300.00
2/26/2020	Attention to fact checking complaint; attention to revising complaint; emails re complaint; call from Catherine Reisman for JR	L.G.	200.00	2.20	\$440.00
2/26/2020	Further attention to SAC; attention to supplemental brief in support of PI motions and class cert; attention to proposed order; attention to correspondence with opposing counsel,	J.D.R.	690.00	9.50	\$6,555.00

seeking corrections of misstatements on the record.

2/27/2020	Review/Format/Upload Docket Entries.	S.D.	150.00	.10	\$15.00
2/27/2020	Emailing courtesy copies to Pollock and Thurston.	A.R.	150.00	.20	\$30.00
2/27/2020	Shipping Certified Letter to Soranno, Scanning/Uploading Certified Receipt.	S.D.	150.00	.30	\$45.00
2/27/2020	Review/Format/Upload Docket Entry re Corrected Complaint, Preparing CCs to Judge Hillman/Soranno, Passing to Anne for Completion.	S.D.	150.00	.40	\$60.00
2/27/2020	Printing out courtesy copies for Class Action; mailing courtesy copies at Post Office.	A.R.	150.00	1.10	\$165.00
2/27/2020	Attention to Special Master re Judge Hayden and Judge Linares decision history.	K.W.	250.00	1.00	\$250.00
2/27/2020	Attention to legal research re federal monitors	L.G.	200.00	1.40	\$280.00
2/27/2020	Hearing prep; legal research; further attention to filed documents.	J.D.R.	690.00	4.40	\$3,036.00
2/28/2020	Review/Format/Upload Text Orders/Correspondence from Soranno/Docket Entry, Updating Calendar/Case Tracking, Fwd to John/Don/Pollock/Thurston, Working on Contacts List for Class Action for John.	S.D.	150.00	1.60	\$240.00
3/2/2020	E-Mails w Pollock re Scheduling, Review/Format/Upload Text Order re Hearing Adjournment, Updating Calendar/Case Tracking/Trial Calendar.	S.D.	150.00	.20	\$30.00

3/2/2020	Downloading Docket Report, Uploading/Formatting, E-Mail to John.	S.D.	150.00	.30	\$45.00
3/2/2020	Working on Updated Phone List cont.	S.D.	150.00	.50	\$75.00
3/2/2020	Prepare for team call; team call to discuss supplemental brief regarding Second PI Motion	D.S.	550.00	1.00	\$550.00
3/2/2020	Travel time to/from and at D.N.J. for postponed court hearing.	W.I.P.	500.00	1.50	\$750.00
3/2/2020	Call to discuss strategy; further research.	J.D.R.	690.00	1.50	\$1,035.00
3/2/2020	Drafting supplemental brief re second PI motion; legal research re same.	J.D.R.	690.00	3.50	\$2,415.00
3/3/2020	Reviewing/Updating Changes to Directory re Walsh Law Firm Edits.	S.D.	150.00	.10	\$15.00
3/3/2020	Updating Directory re VLJ Contact.	S.D.	150.00	.20	\$30.00
3/3/2020	Working on Updated Contacts Directory cont., Sending to John.	S.D.	150.00	.30	\$45.00
3/3/2020	Attention to correspondence	L.Q.	500.00	.10	\$50.00
3/3/2020	Meeting and lunch with VLJ, travel related to same	J.D.R.	690.00	3.50	\$2,415.00
3/3/2020	legal research; hearing prep.	J.D.R.	690.00	4.50	\$3,105.00

3/4/2020	Review/Format/Upload Certified Return Receipt re Soranno/Class Action, Fwd to Attorneys, Filing Paper Copy.	S.D.	150.00	.20	\$30.00
3/4/2020	Review/comment on proposed form of Order	D.S.	550.00	.80	\$440.00
3/4/2020	Further attention to legal reasearch and drafting supplemental brief and related papers.	J.D.R.	690.00	4.40	\$3,036.00
3/5/2020	Call from Catherine Reisman	L.G.	200.00	.10	\$20.00
3/5/2020	Review of emails re. supplemental brief.	S.Q.E.	500.00	.50	\$250.00
3/5/2020	Review/revise draft brief in response to OTSC; draft inserts for brief; review Dwyer Cert.; team emails re: same	D.S.	550.00	4.80	\$2,640.00
3/5/2020	Research and drafting supplemental brief; attention to certifications; attention to case management; further attention to fact gathering, including review of documents obtained through public records requests.	J.D.R.	690.00	7.80	\$5,382.00
3/6/2020	Working on Table of Contents/Authorites.	S.D.	150.00	.20	\$30.00
3/6/2020	Working on Table of Contents/Authorities.	A.R.	150.00	.90	\$135.00
3/6/2020	Attention to supplemental brief	L.Q.	500.00	.30	\$150.00
3/6/2020	emails/review of supplemental brief.	S.Q.E.	500.00	.40	\$200.00

3/6/2020	Attention to hearing preparation and strategy; review transcript from prior hearing relative to same	K.H.	550.00	4.00	\$2,200.00
3/6/2020	hearing prep with Ms. Haley	J.D.R.	690.00	4.00	\$2,760.00
3/6/2020	Work on Brief; work on Certifications; draft/review/revise ancillary documents; finalize and file all documents	D.S.	550.00	6.20	\$3,410.00
3/6/2020	further attention to research and drafting response to OTSC	J.D.R.	690.00	5.90	\$4,071.00
3/8/2020	Attention to transcript of previous hearing and analysis of same; attention to strategy for next hearing date	K.H.	550.00	3.00	\$1,650.00
3/8/2020	Preparation for oral argument; further close review of transcript of 11/18 hearing	J.D.R.	690.00	3.50	\$2,415.00
3/9/2020	Review/Format/Upload Docket Entry re Second Preliminary Injunction Motion Supplemental Brief, Fwd to Thurston/Pollock.	S.D.	150.00	.20	\$30.00
3/9/2020	Review/Format/Upload Docket Entry/Clerk Text Order re Extension for Time to Answer, Updating Calendar/Case Tracking, Fwd to Pollock/Thurston.	S.D.	150.00	.20	\$30.00
3/9/2020	Preparing CC of Supplemental Brief re 2nd Preliminary Injunction Motion to Judge Hillman, Shipping at Post Office.	S.D.	150.00	.90	\$135.00
3/9/2020	Attend to strategy for active class and upcoming argument	D.S.	550.00	.40	\$220.00
3/9/2020	Further attention to standing issues; consideration of supplemental filings.	J.D.R.	690.00	3.50	\$2,415.00
3/9/2020	Call with Ms. Valverde re legal standard for ripeness; follow-up to same; legal research.	J.D.R.	690.00	4.40	\$3,036.00

3/10/2020	Resending Supplemental Brief to Thurston.	S.D.	150.00	.10	\$15.00
3/10/2020	Distributing Finalized Directory to Pltf Counsel and Amici.	S.D.	150.00	.10	\$15.00
3/10/2020	E-Filing Letter Regarding Revised Proposed Order.	S.D.	150.00	.20	\$30.00
3/10/2020	Review of email to Serrano, letter re. proposed order.	S.Q.E.	500.00	.20	\$100.00
3/10/2020	Team Call	D.S.	550.00	.30	\$165.00
3/11/2020	Review/Format/Upload Docket Entry re Correspondence to Judge Hillman.	S.D.	150.00	.10	\$15.00
3/11/2020	Preparing/Sending CC of Letter to Judge Hillman.	S.D.	150.00	.40	\$60.00
3/12/2020	Review/Format/Upload Docket Entries re Def. Opposition to/Amicus Support of Motion for Preliminary Injunction, Fwd to Pollock/Thurston/Kenneth.	S.D.	150.00	.30	\$45.00
3/12/2020	Hearing prep; legal research re 23(f); legal research re inherent authority.	J.D.R.	690.00	5.50	\$3,795.00
3/13/2020	Review District Court Notice to the Public re Covid Outbreak, Call to Chambers re Additional Guidelines, E-Mail to John.	S.D.	150.00	.20	\$30.00
3/13/2020	Email re. upcoming hearing.	S.Q.E.	500.00	.10	\$50.00
3/16/2020	Review/Format/Upload Text Order re Adjournment, Updating Calendar/Case Tracking/Trail Calendar, Fwd to Thurston/Pollock/Kenneth.	S.D.	150.00	.20	\$30.00

3/16/2020	Attention to legal research re inherent authority of court to preserve ability to adjudicate issues; zoom call (cancelled); call to JR re zoom call	L.G.	200.00	4.00	\$800.00
3/17/2020	Attention to reading Second Amended Complaint; notes re same	L.G.	200.00	2.60	\$520.00
3/18/2020	Attention to reading NJDOE's Motion to Dismiss; reading opposition to MTD; reply to same	L.G.	200.00	3.00	\$600.00
3/20/2020	Attention to zoom call	L.G.	200.00	.70	\$140.00
3/20/2020	Participate in team strategy call	D.S.	550.00	.40	\$220.00
3/23/2020	Attention to reading motion for preliminary injunction	L.G.	200.00	2.00	\$400.00
3/24/2020	Attention to further reading of motion for preliminary injunction; notes for same	L.G.	200.00	3.00	\$600.00
3/25/2020	Attention to reading Def brief in opposition to preliminary injunction; notes on same	L.G.	200.00	3.00	\$600.00
3/26/2020	Attention to electronic filing notice from court re Defendant First Motion to Dismiss Second Amended Complaint	L.G.	200.00	.10	\$20.00
3/26/2020	Emails re recent filing.	S.Q.E.	500.00	.20	\$100.00
3/27/2020	Attention to docket notice from court re Order to set deadlines for First Motion to Dismiss Second Amended Complaint	L.G.	200.00	.10	\$20.00
3/27/2020	Review/Format/Upload Docket Entry/Notice re Def Motion to Dismiss/Scheduling Notice, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00



3/27/2020	Attention to emails.	S.Q.E.	500.00	.50	\$250.00
3/27/2020	Attention to reading Plaintiff's brief in support of second preliminary injunction; notes re same	L.G.	200.00	3.00	\$600.00
3/30/2020	E-Mail from Don, Updating Calendar/Case Tracking re Opposition to Def. Motion to Dismiss Deadlines.	S.D.	150.00	.10	\$15.00
3/30/2020	Emails re. NJDOE conference re. COVID-19.	S.Q.E.	500.00	.20	\$100.00
3/30/2020	Review draft letter to DAG Soranno	D.S.	550.00	.30	\$165.00
3/30/2020	Reviewing Dwyer Comments re Correspondence, E-Mail to John, Editing Letter re Dwyer Comments, E-Mail to Soranno/Blenner/Jensen, Preparing Certified Copies to Soranno/Judge Bass/McDonald.	S.D.	150.00	1.20	\$180.00
3/30/2020	Attention to hearing adjournments in the OAL.	J.D.R.	690.00	.70	\$483.00
3/30/2020	Attention to reading Defendant's brief in opposition to second preliminary injunction; attention to reading Plaintiff's reply to Defendant's opposition brief; notes re same; attention to reading Plaintiff's supplemental brief in support of second preliminary injunction	L.G.	200.00	4.00	\$800.00
3/31/2020	Shipping Certified Letters at Post Office.	S.D.	150.00	.20	\$30.00
3/31/2020	Attention to correspondence and draft documents	L.Q.	500.00	.20	\$100.00
3/31/2020	Attention to reading Defendant opposition to Plaintiff's supplemental brief in support of second preliminary injunction; attention to reading Defendant's Motion to Dismiss Second Amended Complaint	L.G.	200.00	3.00	\$600.00

3/31/2020	Emails re. adjournment request from DOE/ review of related correspondence.	S.Q.E.	500.00	1.40	\$700.00
3/31/2020	Attention to email from Judge Hillman's clerk; drafting letter response.	J.D.R.	690.00	2.20	\$1,518.00
4/1/2020	Drafting Blackline re Def.s Motions to Dismiss for John, Sending to John, Uploading.	S.D.	150.00	.30	\$45.00
4/1/2020	Attend to strategy, including reviewing emails on proposed actions	D.S.	550.00	.20	\$110.00
4/1/2020	Attention to correspondence, draft documents and letter from OAL	L.Q.	500.00	.40	\$200.00
4/1/2020	Emails re. adjournment request/review of email to Kanterman/review of EO 103.	S.Q.E.	500.00	1.30	\$650.00
4/1/2020	Attention to reading transcript of February 18 hearing	L.G.	200.00	3.00	\$600.00
4/2/2020	Attempt to forward case emails to L. Griffin.	S.Q.E.	500.00	.20	\$100.00
4/2/2020	Attention to emails re. 4/3/20 Zoom meeting/review of Defendant's correspondence to Kanterman.	S.Q.E.	500.00	.60	\$300.00
4/2/2020	Attention to further reading of Feb 18 oral argument transcript; attention to reading/comparing blacklined version of Defendant Motions to Dismiss; notes re same	L.G.	200.00	4.00	\$800.00
4/2/2020	Further research on expedited discovery; further attention to drafting letter to Judge Hillman requesting same.	J.D.R.	690.00	3.50	\$2,415.00
4/3/2020	Participate in Team Video Call to discuss MTD and discovery	D.S.	550.00	.70	\$385.00

4/3/2020	Review motion to dismiss second amended complaint; notes re same; attention to class action zoom call meeting; attention to e-notice from court re entry of appearance; emails re NJDOE OPRA request	L.G.	200.00	2.50	\$500.00
4/3/2020	Attendance at Zoom meeting/emails re. same.	S.Q.E.	500.00	1.60	\$800.00
4/6/2020	Review/Format/Upload Docket Entry re Wasserman Notice of Appearance.	S.D.	150.00	.10	\$15.00
4/6/2020	Finalize and file extension letter	D.S.	550.00	.20	\$110.00
4/6/2020	Emails re. court correspondence, letter to Judge Hillman and Kanterman.	S.Q.E.	500.00	.30	\$150.00
4/6/2020	Draft letter to Hillman re: COVID Extension	D.S.	550.00	.40	\$220.00
4/6/2020	Attention to reading motion for leave to appear as amici brief and supporting documents	L.G.	200.00	2.00	\$400.00
4/7/2020	Review/Format/Upload Docket Entry re Soutar Letter to Court re Motion to Dismiss Second Amended Complaint.	S.D.	150.00	.10	\$15.00
4/7/2020	E-Filing Rue Letter to Court.	S.D.	150.00	.10	\$15.00
4/7/2020	Scan/Format/Upload Certified Return Receipts re Rue Letter to Soranno, Fwd to John, Filing Paper Copies.	S.D.	150.00	.10	\$15.00
4/7/2020	Review letter to the court	L.Q.	500.00	.20	\$100.00

4/7/2020	Attention to email re certified mail receipts; attention to letter re first motion to dismiss second amended complaint; attention to plaintiff letter to the court	L.G.	200.00	.50	\$100.00
4/7/2020	Emails re. Plaintiffs' latest filing/court correspondence.	S.Q.E.	500.00	.40	\$200.00
4/8/2020	Review/Format/Upload Docket Entry re Def. Response to Rue Letter.	S.D.	150.00	.10	\$15.00
4/8/2020	Attention to ecourts notice; attention to letter from defendant to the court	L.G.	200.00	.20	\$40.00
4/8/2020	Review reply to motion to dismiss and memos re: deliberative process and monitors	L.Q.	500.00	.50	\$250.00
4/9/2020	Attention to reading plaintiff response in opposition to first motion to dismiss second amended complaint	L.G.	200.00	.20	\$40.00
4/9/2020	E-Filing Brief re Opposition to Motion to Dismiss Second Amended Complaint.	S.D.	150.00	.30	\$45.00
4/9/2020	Attention to letter for the court	L.Q.	500.00	.10	\$50.00
4/9/2020	Attention to emails.	S.Q.E.	500.00	.40	\$200.00
4/9/2020	Review/revise draft letter brief in opposition to the MTD; draft cert of service; respond to issues related to law of the case	D.S.	550.00	.40	\$220.00
4/13/2020	Attention to reading amici brief in support of second preliminary injunction; notes	L.G.	200.00	2.00	\$400.00
4/14/2020	Call from John, Updating Docket Sheet, E-Mail to John.	S.D.	150.00	.20	\$30.00

4/14/2020	Attention to correspondence with court re: 4/16/date	L.Q.	500.00	.10	\$50.00
4/14/2020	Attention to emails.	S.Q.E.	500.00	.40	\$200.00
4/15/2020	Attention to text order	L.G.	200.00	.10	\$20.00
4/15/2020	Review/Format/Upload Docket Text Order re Hearing Adjournment, Updating Calendar/Case Tracking/Trial Calendar.	S.D.	150.00	.20	\$30.00
4/15/2020	Attention to status update from court	L.Q.	500.00	.10	\$50.00
4/15/2020	Emails re. recent adjournment to 5/28/20.	S.Q.E.	500.00	.20	\$100.00
4/16/2020	Drafting OPRA Request re ALJs on Special Ed Cases.	S.D.	150.00	.10	\$15.00
4/16/2020	Drafting OPRA Request to OAL re ALJs cont., E-Mail to John	S.D.	150.00	.20	\$30.00
4/19/2020	Emails regarding conducting research on arguments against text message discovery.	S.Q.E.	500.00	.60	\$300.00
4/20/2020	Finalizing OPRA Request re ALJs/Special Education Cases, Faxing to OAL Records Custodian.	S.D.	150.00	.40	\$60.00
4/20/2020	Fed. R. Civ. P. 26 research regarding text message discovery collection.	S.Q.E.	500.00	2.00	\$1,000.00
4/21/2020	Updating Docket Sheet re Class Action.	S.D.	150.00	.10	\$15.00

4/21/2020	Drafting Additional OPRA Request re ALJ CVs/Resumes, E-Mail to John.	S.D.	150.00	.10	\$15.00
4/21/2020	Finalizing OPRA Request re ALJ CVs, Faxing to OAL Records Custodian.	S.D.	150.00	.10	\$15.00
4/21/2020	Attention to research/cases involving Fed. R. Civ. P. 26, text message collection and novel privacy implications implicit in ESI (electronically stored information).	S.Q.E.	500.00	1.00	\$500.00
4/22/2020	Call from Dwyer re Class Action, E-Mail to John.	S.D.	150.00	.10	\$15.00
4/22/2020	Call from Dwyer, Fwd to john.	S.D.	150.00	.10	\$15.00
4/24/2020	Review of Lawton v. Love's re. Rule 26 and arguments against text message discovery/drafting of summary re. same.	S.Q.E.	500.00	1.00	\$500.00
4/25/2020	Research into proportionality, relevance, etc in Rule 26 re. text message discovery/attention to drafting summary of same.	S.Q.E.	500.00	2.00	\$1,000.00
4/26/2020	Text message discovery research.	S.Q.E.	500.00	.70	\$350.00
4/27/2020	Review/Format/Upload Docket Entry re NJDOE Reply Brief Opposing Motion, Fwd to John, Updating Class Action Docket Sheet.	S.D.	150.00	.20	\$30.00
4/27/2020	Research in Fed. R. Civ. P. 26 and privacy implicatons of ESI, attention to balancing tests courts conduct when deciding scope/cases regarding same/attention to drafting effective argument against text message collection requests.	S.Q.E.	500.00	3.60	\$1,800.00
4/28/2020	Attention to completing proportionality research/cases.	S.Q.E.	500.00	2.00	\$1,000.00

4/29/2020	Finalization of text message discovery research/effective argument against same drafting/submission to John/emails re. same.	S.Q.E.	500.00	1.20	\$600.00
4/30/2020	Attention to revising effective arguments against text message evidence/emails re. same.	S.Q.E.	500.00	.60	\$300.00
4/30/2020	Attention to reading Defendant reply to Plaintiff's opposition to motion to dismiss; notes re same	L.G.	200.00	2.00	\$400.00
5/1/2020	Emails. re. effective argument against text message discovery.	S.Q.E.	500.00	.50	\$250.00
5/4/2020	Updating Docket Sheet.	S.D.	150.00	.10	\$15.00
5/6/2020	Preparing Certified Correspondence to Soranno/CCs to Judge, McDonald, Blenner.	S.D.	150.00	.40	\$60.00
5/6/2020	Attention to emails re. letter to Serrano re. OAL adjournments during COVID-19 Pandemic, emails re. same/review of letter.	S.Q.E.	500.00	1.50	\$750.00
5/7/2020	Attention to email from JR encl. OPRA responses	L.G.	200.00	.10	\$20.00
5/7/2020	Preparing Certified Letter/CCs cont., Shipping at Post Office.	S.D.	150.00	.60	\$90.00
5/12/2020	Updating Docket Sheet.	S.D.	150.00	.10	\$15.00
5/12/2020	Background Research via Publicly Available Documents and Information on ALJs.	S.D.	150.00	.60	\$90.00
5/13/2020	Background Research via Publicly Available Documents and Information on ALJs cont., E-Mail to Latiah/Kenneth.	S.D.	150.00	.90	\$135.00

5/14/2020	Review/Format/Upload Certified Return Receipts re Ltr to Soranno, Fwd to John/Don, Filing Paper Copies.	S.D.	150.00	.10	\$15.00
5/18/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
5/18/2020	Review/Format/Upload Certified Return Receipt re Rue Letter to Soranno (Judge Bass), Fwd to Attorneys.	S.D.	150.00	.10	\$15.00
5/18/2020	Emails regarding discovery evidence.	S.Q.E.	500.00	.20	\$100.00
5/18/2020	Attention to ALJ resume project; attention to email from SD encl. document receipt	L.G.	200.00	2.10	\$420.00
5/19/2020	Attention to ALJ resume project	L.G.	200.00	2.00	\$400.00
5/20/2020	Review of email re. Jurisdiction brief.	S.Q.E.	500.00	.30	\$150.00
5/20/2020	Attention to ALJ resume project	L.G.	200.00	2.50	\$500.00
5/21/2020	Class Action emails re jurisdiction matter brief.	S.Q.E.	500.00	.50	\$250.00
5/21/2020	Attention to ALJ resume project spreadsheet; attention to OAL website; email to JR re same	L.G.	200.00	2.50	\$500.00
5/22/2020	Review/Format/Upload Docket Entries re Opinion/Order Denying Motion to Dismiss in Part, Fwd to John/Lisa.	S.D.	150.00	.20	\$30.00
5/22/2020	Review Order on MTD; draft brief email re: same	D.S.	550.00	.10	\$55.00



5/22/2020	Review Opinion	D.S.	550.00	.20	\$110.00
5/22/2020	Telephone conference to discuss strategy	D.S.	550.00	.40	\$220.00
5/22/2020	Review of decision and DOE follow-up letter	L.Q.	500.00	.50	\$250.00
5/22/2020	Emails to reporters regarding MTD decision.	W.I.P.	500.00	.60	\$300.00
5/22/2020	Attention to ECF notices; attention to reading opinion; attention to emails re meeting to discuss next steps strategy	L.G.	200.00	2.30	\$460.00
5/22/2020	Review of court opinion and order/attention to case strategy in light of same.	S.Q.E.	500.00	1.30	\$650.00
5/22/2020	Review decision on motion to dismiss; consultations with co-counsel; strategy and planning for hearing and for discovery.	J.D.R.	690.00	5.50	\$3,795.00
5/23/2020	review of Order denying dismissal; attention to staffing strategy & discovery planning	K.H.	550.00	1.20	\$660.00
5/23/2020	Consultations with co-counsel; strategy and planning for hearing and for discovery.	J.D.R.	690.00	2.50	\$1,725.00
5/26/2020	Updating Docket Report, Review/Format/Upload Docket Entry re Blenner Letter re Proposed Guidelines Status/Order re Status Conference, Updating Case Tracking/Calendar/Trial Calendar.	S.D.	150.00	.40	\$60.00
5/26/2020	Attend to strategy	D.S.	550.00	.20	\$110.00

5/26/2020	Review text order; telephone conference with J. Rue re: strategy for handling	D.S.	550.00	.40	\$220.00
5/26/2020	Attention to strategy re text order & expedited hearing	K.H.	550.00	.80	\$440.00
5/26/2020	Team Zoom call to discuss Text Order, proposed response, and strategy for future handling	D.S.	550.00	.90	\$495.00
5/26/2020	Attention to text order; attention to further research for ALJ resume project; emails re meet and confer; emails re initial discovery	L.G.	200.00	2.50	\$500.00
5/26/2020	Attention to text Order and conversion of 5/28/20 hearing to a telephone conference/Zoom meeting regarding same and next steps with plaintiffs? counsel/emails re. same	S.Q.E.	500.00	1.50	\$750.00
5/26/2020	Communications with DOE; drafting letter to court re expedited trial.	J.D.R.	690.00	2.20	\$1,518.00
5/26/2020	Further attention to court decision; class counsel team call; preparation and follow-up to same; preparation for discovery.	J.D.R.	690.00	6.50	\$4,485.00
5/27/2020	Attention to ECF notices; attention to JR letter to court	L.G.	200.00	.30	\$60.00
5/27/2020	Additional attention to joint letter to court, responding to adversary's comments; filing letter on ECF.	J.D.R.	690.00	2.10	\$1,449.00
5/27/2020	Call with opposing counsel to meet and confer; preparation for and follow-up to same; emails related to same issue; attention to drafting letter to judge.	J.D.R.	690.00	2.50	\$1,725.00
5/28/2020	Filing Rue Letter to Court on PACER re Motion for Preliminary Injunction/Motion to Certify Class.	S.D.	150.00	.10	\$15.00
5/28/2020	Filing Rue Letter on PACER cont.	S.D.	150.00	.10	\$15.00

5/28/2020	Review/Format/Upload Docket Entries re Joint Letter to Court cont./Rue Letter to Court re Pending Motions.	S.D.	150.00	.20	\$30.00
5/28/2020	Review/Format/Upload Docket Notices re Text ORder, Updating Calendar/Case Tracking, Review/Format/Upload Docket Entry re Joint Letter re Motions/Expedited Trial.	S.D.	150.00	.40	\$60.00
5/28/2020	Attention to email to class action plaintiffs.	S.Q.E.	500.00	.20	\$100.00
5/28/2020	Emails to reporters regarding MTD decision.	W.I.P.	500.00	.80	\$400.00
5/28/2020	Attention to attending special education webinar re COVID-19; notes and follow up research re same; email to plaintiffs re class action MTD; attention to ECF notice re motion to certify class	L.G.	200.00	3.00	\$600.00
5/28/2020	Legal research re class certification and mootness; drafting letter to court; strategy and planning.	J.D.R.	690.00	4.40	\$3,036.00
5/29/2020	Review/Format/Upload Docket Entry re Soranno Letter to Court re Rue Letter to Court, Fwd to John.	S.D.	150.00	.10	\$15.00
5/29/2020	Create spreadsheet re Class Action fees / expenses.	A.R.	150.00	.40	\$60.00
5/29/2020	Attention to ECF notice; attention to response brief; attention to defendant letter to court	L.G.	200.00	.60	\$120.00
5/29/2020	Attention to emails.	S.Q.E.	500.00	.30	\$150.00
6/1/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
6/1/2020	Review/Format/Upload Docket Entry re Def. Motion for Extended Time to Answer, Fwd to John/Pollock.	S.D.	150.00	.10	\$15.00

6/1/2020	Class action-attention to call with class action plaintiffs.	S.Q.E.	500.00	.10	\$50.00
6/1/2020	Email to John re Zoom conference call, schedule conference call, email to clients.	A.R.	150.00	.50	\$75.00
6/1/2020	Call with John re conference call, correspondence with clients re conference call, Zoom conference call with clients.	A.R.	150.00	2.20	\$330.00
6/1/2020	Attention to ECF notices; email re Doodle poll; phone call re class plaintiffs with JR and AR; phone call to plaintiff re zoom meeting; emails to same re same; zoom conference call with plaintiffs	L.G.	200.00	2.00	\$400.00
6/1/2020	Class Action video call with clients; follow-up re: same	D.S.	550.00	1.30	\$715.00
6/1/2020	Call with clients; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
6/1/2020	Further attention to revising contract between firms; discussion with co-counsel re same; Discovery planning and strategy; call with co-counsel re same.	J.D.R.	690.00	5.20	\$3,588.00
6/2/2020	Review/Format/Upload Text Order Granting Def. Extended Time to Answer, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
6/2/2020	Review file to evaluate recent docket notice re date for answer	D.S.	550.00	.10	\$55.00
6/2/2020	Correspondence with clients, schedule conference call.	A.R.	150.00	.60	\$90.00
6/2/2020	Legal research re class certification, waiver, estoppel, etc.; calls with co-counsel; attention to file.	J.D.R.	690.00	4.50	\$3,105.00

6/3/2020	Zoom conference call with clients.	A.R.	150.00	.80	\$120.00
6/3/2020	Participate in client call	D.S.	550.00	.80	\$440.00
6/3/2020	Attention to ECF notice; attention to zoom conference call with co-counsel; email re ALJ resume research; email from JR re class action engagement agreements; attention to class plaintiff engagement agreement language	L.G.	200.00	3.00	\$600.00
6/3/2020	Close attention to docket entries discussing discovery.	J.D.R.	690.00	2.50	\$1,725.00
6/3/2020	Legal research re equitable estoppel, laches, and judicial estoppel.	J.D.R.	690.00	4.40	\$3,036.00
6/4/2020	Team call to discuss responsive letter from Judge Bass and any impact on handling of case	D.S.	550.00	.60	\$330.00
6/4/2020	Attention to emails re. Bass response/call to discuss same./Review of related documents/review of Doe plaintiffs.	S.Q.E.	500.00	.90	\$450.00
6/4/2020	Attention to research re ALJ resume; emails re case strategy; zoom conference call re same; email to JR re ALJ research findings	L.G.	200.00	4.00	\$800.00
6/4/2020	Further attention to legal research re class certification; attention to discovery planning; attention to correspondence between amici and OAL; call to discuss same.	J.D.R.	690.00	5.50	\$3,795.00
6/5/2020	Review team emails; attend to strategy for timing of renewed motion for class certification	D.S.	550.00	.20	\$110.00
6/5/2020	Update fees / expenses spreadsheet cont.	A.R.	150.00	.70	\$105.00

6/5/2020	Attention to emails re case strategy	L.G.	200.00	.70	\$140.00
6/5/2020	Attention to discussion re: refiling class certification	L.Q.	500.00	.30	\$150.00
6/5/2020	Update fees / expenses spreadsheet.	A.R.	150.00	1.00	\$150.00
6/5/2020	Further attention to legal research and drafting brief in support of renewed motion for class certification.	J.D.R.	690.00	8.80	\$6,072.00
6/6/2020	Further attention to drafting and researching renewed class certification motion.	J.D.R.	690.00	5.40	\$3,726.00
6/7/2020	Attention to docket entries.	S.Q.E.	500.00	.40	\$200.00
6/7/2020	Review/revise/finalize draft brief in support of motion for class certification; draft/review/revise finalize Notice of Motion and proposed Order	D.S.	550.00	7.20	\$3,960.00
6/7/2020	Finalizing renewed class certification motion.	J.D.R.	690.00	6.50	\$4,485.00
6/8/2020	Review docket entry and draft instructions to compile brief and submit courtesy copies	D.S.	550.00	.10	\$55.00
6/8/2020	Updating Docket Report, Review/Format/Upload Docket Notice re Motion for Class Certification Motion Date, Updating Calendar/Case Tracking.	S.D.	150.00	.40	\$60.00
6/8/2020	Review of renewed Motion for Class Certification	L.Q.	500.00	.30	\$150.00
6/8/2020	Attention to Don email, prepare mailing of courtesy copy to Court.	A.R.	150.00	1.50	\$225.00

6/8/2020	Attention to ECF notice (from Sunday); attention to reading motion to certify class; attention to read NJ law journal article re special education	L.G.	200.00	1.50	\$300.00
6/8/2020	Correspondence with co-counsel re strategy and planning; legal research re class discovery.	J.D.R.	690.00	2.50	\$1,725.00
6/9/2020	Checking Class Action Docket re Def. Adjournment Requests for John, Drafting Spreadsheet re Adjournments.	S.D.	150.00	1.20	\$180.00
6/9/2020	Phone call with J. Rue to discuss strategy; review email traffic; draft responding email re: strategy	D.S.	550.00	.40	\$220.00
6/9/2020	Attention to emails re class action strategy	L.G.	200.00	1.50	\$300.00
6/9/2020	Emails re OAL zoom meetings/rescheduling, and Zoom consent.	S.Q.E.	500.00	.80	\$400.00
6/9/2020	Further attention to research re class discovery; strategy and planning.	J.D.R.	690.00	3.90	\$2,691.00
6/10/2020	Review/Format/Upload Text Order re First Motion for Class Certification/Docket Entry re John Letter to Court re Class Certification, Fwd to Pollock.	S.D.	150.00	.20	\$30.00
6/10/2020	Reviewing Docket re Def. Adjournments/Drafting Spreadsheet cont.	S.D.	150.00	.30	\$45.00
6/10/2020	Reviewing Docket re Def. Adjournment Requests/Drafting Spreadsheet cont.	S.D.	150.00	.30	\$45.00
6/10/2020	Attention to Text Order regarding class certification.	S.Q.E.	500.00	.10	\$50.00
6/10/2020	Reviewing Class Action Docket re Def. Adjournments/Drafting Spreadsheet cont., E-Mail to John.	S.D.	150.00	2.10	\$315.00

6/11/2020	Review/Format/Upload Text Order re First Motion for Class Certification, Fwd to Pollock.	S.D.	150.00	.10	\$15.00
6/11/2020	Attention to email.	S.Q.E.	500.00	.10	\$50.00
6/11/2020	Write notes on Zoom webinar re remote learning.	A.R.	150.00	1.10	\$165.00
6/11/2020	Review of Motion for Class certification and Court Order re: same	L.Q.	500.00	.40	\$200.00
6/11/2020	Attention to correspondence between amici and ALJ Bass; attention to strategy re class certification; attention to legal research re class certification issues.	J.D.R.	690.00	2.20	\$1,518.00
6/12/2020	Create spreadsheet re 2018-2020 OAL Decisions.	A.R.	150.00	1.00	\$150.00
6/12/2020	Update spreadsheet re 2018-2020 OAL Decisions.	A.R.	150.00	1.30	\$195.00
6/12/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	1.80	\$270.00
6/12/2020	Consultation with amici; strategy and planning for discovery; attention to zoom hearing protocols	J.D.R.	690.00	2.90	\$2,001.00
6/15/2020	Updating Docket Report.	S.D.	150.00	.20	\$30.00
6/15/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	.20	\$30.00
6/15/2020	Attention to E-Mail from Thurston, Uploading.	S.D.	150.00	.20	\$30.00



6/15/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	.30	\$45.00
6/15/2020	Update fees / expenses spreadsheet.	A.R.	150.00	.30	\$45.00
6/15/2020	Update spreadsheet re 2018-2020 OAL Decisions.	A.R.	150.00	1.20	\$180.00
6/15/2020	Attention to case management.	J.D.R.	690.00	.50	\$345.00
6/15/2020	Attention to email re related case filing; attention to reading motion for TRO and supporting documents	L.G.	200.00	2.00	\$400.00
6/15/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	3.00	\$450.00
6/15/2020	Strategy and planning for discovery; review materials submitted in J.A. case.	J.D.R.	690.00	3.30	\$2,277.00
6/16/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	.40	\$60.00
6/16/2020	Update spreadsheet re 2018-2020 OAL Decisions.	A.R.	150.00	1.80	\$270.00
6/16/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	2.20	\$330.00
6/16/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	2.10	\$315.00
6/16/2020	Attention to reading motion for TRO and supporting documents; attention to emails re same	L.G.	200.00	2.00	\$400.00

6/16/2020	Attention to email re. Thurston filings	S.Q.E.	500.00	1.00	\$500.00
6/16/2020	Further attention to developments in J.A.	J.D.R.	690.00	1.10	\$759.00
6/17/2020	Attention to ECF notice re OTSC re case consolidation	L.G.	200.00	.10	\$20.00
6/17/2020	Attention to emails/attention to 6/17/20 text order.	S.Q.E.	500.00	.30	\$150.00
6/17/2020	Update spreadsheet re 2018-2020 OAL Decisions.	A.R.	150.00	1.70	\$255.00
6/17/2020	Update spreadsheet re 2018-2020 OAL Decisions cont., upload decisions on Sharepoint.	A.R.	150.00	4.70	\$705.00
6/18/2020	Review/Format/Upload Text Order re Order to Show Cause re Consolidation, Updating Calendar/Case Tracking, Fwd to Pollock/Thurston.	S.D.	150.00	.20	\$30.00
6/18/2020	Review updates on Rob Thurston's class action case	D.S.	550.00	.10	\$55.00
6/18/2020	Review draft letter re: OTSC on consolidation; draft comments to same	D.S.	550.00	.30	\$165.00
6/18/2020	Call from John re Child Find, analysis of OAL Decisions re Child Find.	A.R.	150.00	2.80	\$420.00
6/18/2020	Upload OAL decisions on Sharepoint, email John re OAL decisions re Child Find.	A.R.	150.00	3.90	\$585.00
6/18/2020	Legal research re Rule 42 consolidation; drafting letter to court; communications with counsel for JA; communications with co-counsel.	J.D.R.	690.00	6.30	\$4,347.00

6/19/2020	Review/Format/Upload Docket Entry re Pltf Response to Order to Show Cause re Consolidation, Fwd to John/Pollock.	S.D.	150.00	.20	\$30.00
6/19/2020	Email John re OAL Decisions re Child Find.	A.R.	150.00	.20	\$30.00
6/19/2020	Reviewed letter from J.R. regarding consolidation of case.	W.I.P.	500.00	.10	\$50.00
6/19/2020	Call with J. Rue to discuss strategy	D.S.	550.00	.10	\$55.00
6/19/2020	Analysis of OAL Decisions re Child Find, email John re same.	A.R.	150.00	1.10	\$165.00
6/19/2020	Attention to docket entry-letter submitted by plaintiffs/initial review of Defendants? answer.	S.Q.E.	500.00	.50	\$250.00
6/19/2020	NJSEP Zoom conf call re: NJDOE guidance to schools and OAL guidance re: Zoom hearings; review of counsel response to Court OTC re: consolidation of cases and DOE Answer	L.Q.	500.00	1.30	\$650.00
6/19/2020	Attention to ECF notices; attention to letter to court from JR; attention to reading defendant Answer to Amended Complaint	L.G.	200.00	3.00	\$600.00
6/22/2020	Updating Calendar/Case Tracking re Scheduling Conference cont., Review/Format/Upload Docket Entry re Amici Letter.	S.D.	150.00	.10	\$15.00
6/22/2020	Review/Format/Upload Docket Entry Ordering Initial Conference, Fwd to John/Pollock, Updating Case Tracking/Calendar.	S.D.	150.00	.20	\$30.00
6/22/2020	Review/Format/Upload Docket Entry re Amici Letter to Court cont.	S.D.	150.00	.20	\$30.00
6/22/2020	Review/Format/Upload Docket Entry re Answer to Amended Complaint, Fwd to John/Pollock, Updating Docket Report.	S.D.	150.00	.30	\$45.00

6/22/2020	Discussion re: Answer	D.S.	550.00	.20	\$110.00
6/22/2020	Review of DOE Opposition Brief	L.Q.	500.00	.30	\$150.00
6/22/2020	Review of defendant?s opposition brief/Attention to letter sent to Judge Hillman.	S.Q.E.	500.00	.60	\$300.00
6/22/2020	Attention to ECF filing notices; attention to letter to court from amici curiae and supporting documents; attention to reading NJDOE opposition brief	L.G.	200.00	3.00	\$600.00
6/22/2020	Attention to discovery planning; strategy re case consolidation.	J.D.R.	690.00	3.50	\$2,415.00
6/23/2020	Review/Format/Upload Docket Entry re Def. Opposition to Motion to Certify Class, Fwd to John/Pollock.	S.D.	150.00	.10	\$15.00
6/23/2020	Review prospect list for client who approached us as a potential class action plaintiff	D.S.	550.00	.10	\$55.00
6/23/2020	Attention to case management; discussions with each co-counsel firm; discovery planning.	J.D.R.	690.00	4.50	\$3,105.00
6/24/2020	Call from John re Reply Brief re Renewed Motion for Class Certification, Working on Citations in Reply Brief.	S.D.	150.00	.40	\$60.00
6/24/2020	Working on Reply Brief re Class Cert. cont.	S.D.	150.00	2.00	\$300.00
6/24/2020	Attention to attendance at call/finalizing revisions of discovery draft plan/review of updated plan/email regarding same.	S.Q.E.	500.00	1.70	\$850.00
6/24/2020	Call with team to discuss draft discover plan; further attention to agreement with other plaintiffs' firms; communications with co-counsel re case strategy; attention to drafting	J.D.R.	690.00	6.50	\$4,485.00

reply to class certification brief.

6/25/2020	Adding Class Action Matter to Casefox/Case Tracking.	S.D.	150.00	.10	\$15.00
6/25/2020	Edits to Reply Brief re Class Cert. re Wasserman Comments.	S.D.	150.00	.10	\$15.00
6/25/2020	Correspondance re corrected letter re C.P. v. NJDOE	K.W.	250.00	.20	\$50.00
6/25/2020	Call from John re Letter re Joint Discovery Plan, Preparing/Mailing Letter to Soranno/Blenner, E-Mailing Copy of Corrected Letter to All Counsel.	S.D.	150.00	.50	\$75.00
6/25/2020	Attention to email to counsel/attention to 2020-06-25 letter to Defendants.	S.Q.E.	500.00	.20	\$100.00
6/25/2020	Working on Reply Brief re Class Cert. cont.	S.D.	150.00	.60	\$90.00
6/25/2020	Conference with J. Rue re: strategy for handling amendment, etc.	D.S.	550.00	.20	\$110.00
6/25/2020	Review/respond to internal email re: current draft of amended complaint	D.S.	550.00	.20	\$110.00
6/25/2020	Review/respond to internal emails re: new class plaintiffs	D.S.	550.00	.20	\$110.00
6/25/2020	File review regarding potential new class members	D.S.	550.00	.30	\$165.00
6/25/2020	Working on Reply Brief re Class Cert. cont., E-Mail to John.	S.D.	150.00	1.50	\$225.00

6/25/2020	Review/revise draft reply brief	D.S.	550.00	.50	\$275.00
6/25/2020	Attention to Feinberg docs from 6/2019 LNA/emails re. same.	S.Q.E.	500.00	.60	\$300.00
6/25/2020	Working on Reply Brief re Class Cert. cont.	S.D.	150.00	3.20	\$480.00
6/25/2020	Further attention to drafting papers for filing.	J.D.R.	690.00	2.50	\$1,725.00
6/25/2020	Letter to DAG Soranno; Call with Walsh re discovery management; preparation for and follow-up to same; conference with counsel for amici.	J.D.R.	690.00	2.50	\$1,725.00
6/25/2020	Legal research re class certification; further attention to reply brief.	J.D.R.	690.00	4.40	\$3,036.00
6/26/2020	Review/Format/Upload Docket Entry re Def. Letter Requesting Adjournment of Initial Conference, Fwd to John/Pollock.	S.D.	150.00	.20	\$30.00
6/26/2020	Attention to parties' correspondence with court	L.Q.	500.00	.20	\$100.00
6/26/2020	Attention to ECF filing notices; attention to letter from defendants to court re scheduling; attention to letter from JR to court re same	L.G.	200.00	.50	\$100.00
6/26/2020	Review/respond to email traffic; review/revise draft letter to Court	D.S.	550.00	.30	\$165.00
6/26/2020	Calls from John re adjournment requests, updating adjournment requests spreadsheet.	A.R.	150.00	1.30	\$195.00
6/26/2020	Review letter from AG's office; draft responsive letter to the Court; consultations with co-counsel re same; legal research re same.	J.D.R.	690.00	3.50	\$2,415.00

6/28/2020	Further attention to research and briefing class certification.	J.D.R.	690.00	2.50	\$1,725.00
6/29/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
6/29/2020	Attention to Correspondence.	S.D.	150.00	.10	\$15.00
6/29/2020	Drafting Cert. of Service re Reply Brief.	S.D.	150.00	.20	\$30.00
6/29/2020	Review/Format/Upload Docket Entries re Pltf. Reply Brief re Motion for Class Cert./Def. Letter Responding to Amici Letter, Fwd to John/Pollock.	S.D.	150.00	.20	\$30.00
6/29/2020	Filing Corrected Cert. of Service re Reply Brief, Formatting/Uploading, Fwd to John/Pollock.	S.D.	150.00	.20	\$30.00
6/29/2020	Blackline amended complaints.	A.R.	150.00	.90	\$135.00
6/29/2020	Attention to emails/review of docket notices from the court/letter from defendants filed with court on 2020-06-29.	S.Q.E.	500.00	.70	\$350.00
6/29/2020	Attention to ECF notices; attention to reading Plaintiff's Reply Brief in opposition to Defendant's Motion; attention to reading Defendant letter to court re amici request to expedite; attention to reading Defendant letter re delay; attention to emails w/ co-counsel re NJ regs and strategy	L.G.	200.00	1.70	\$340.00
6/29/2020	Review/revise draft reply brief on motion for class certification; draft email re: same	D.S.	550.00	.70	\$385.00
6/29/2020	Further attention to research and briefing class certification.	J.D.R.	690.00	5.50	\$3,795.00

6/30/2020	Attention to text order	L.G.	200.00	.10	\$20.00
6/30/2020	Review/Format/Upload Text Order re Adjournment, Fwd to Pollock, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
6/30/2020	Review/Format/Upload Docket Entry re Def. Letter to Court Responding to ECF #119, Fwd to John/Pollock.	S.D.	150.00	.20	\$30.00
6/30/2020	Requesting Docket Notices for J.A. Matter through PACER for John/Don/Filesjohnrue, E-Mail t Don/John.	S.D.	150.00	.50	\$75.00
6/30/2020	Attention to Court?s 6-30-20 text order granting defendants? Rule 16 conference adjournment request.	S.Q.E.	500.00	.20	\$100.00
6/30/2020	Attention to responsive letter from adversary, including reviewing recently filed letter and analysis fo same	D.S.	550.00	.20	\$110.00
6/30/2020	Telephone conference with J. Rue re: strategy	D.S.	550.00	.40	\$220.00
6/30/2020	Further attention to revising contract between firms; discussion with co-counsel re same; legal research re consolidation; legal research re staying cases; legal research re mootness when a similar class is certified; discussions with co-counsel; discussions with counsel for JA.	J.D.R.	690.00	8.30	\$5,727.00
7/1/2020	E-Mails w John re J.A. Matter, Setting up Folder for J.A. Files.	S.D.	150.00	.10	\$15.00
7/1/2020	Attention to ECF notice; attention to reading motion for leave to appear pro hac vice	L.G.	200.00	.50	\$100.00
7/1/2020	Attention to docket entry and corresponding docs re. pro hoc vice.	S.Q.E.	500.00	.30	\$150.00



7/1/2020	Call with John re spreadsheet re 2018-2020 OAL Decisions, updating spreadsheet.	A.R.	150.00	2.30	\$345.00
7/1/2020	Attention to J.A. Docket Files from Thurston, Review/Format/Upload All Docket Entries, Retrieving Remaining J.A. Docket Entries from PACER.	S.D.	150.00	2.30	\$345.00
7/1/2020	Working on Class Actions events spreadsheet.	A.R.	150.00	3.20	\$480.00
7/1/2020	Further attention to revising contract between firms; legal research re consolidation; legal research re staying cases; legal research re mootness when a similar class is certified; discussions with co-counsel; discussions with counsel for JA; drafting letter to Judge Hillman.	J.D.R.	690.00	7.50	\$5,175.00
7/2/2020	Attention to Thurston Correspondence re Class Action Consolidation, Uploading Draft Letters.	S.D.	150.00	.10	\$15.00
7/2/2020	Review/Format/Upload Docket Entry re J.A. Def. Response to Order to Show Cause re Consolidation, Fwd to John/Don, Review/Format/Upload Docket Entries re Class Action Letters from Counsel/ Corrected Certification/Def. Response to Order to Show Cause re Consolidation.	S.D.	150.00	.20	\$30.00
7/2/2020	Review/Format/Upload Docket Notice/Clerk Notice re Motion for Amici to Appear Pro Hac Vice, Updating Calendar/Case Tracking, Fwd to Pollock.	S.D.	150.00	.20	\$30.00
7/2/2020	Review/Format/Upload Docket Entries cont., Review/Format/Upload Additional J.A. Docket Entries re Pltf Response to Order to Show Cause re Consolidation.	S.D.	150.00	.20	\$30.00
7/2/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	.90	\$135.00
7/2/2020	Reviewed recent court filings.	W.I.P.	500.00	.30	\$150.00

7/2/2020	Attention to DOE OTC Response and various correspondence with court	L.Q.	500.00	.30	\$150.00
7/2/2020	Review/Format/Upload Docket Entry re Pltf. Motion for Amici Leave to Appear Pro Hac Vice, Fwd to John/Pollock, Downloading Remaining J.A. Docket Files from PACER cont., E-Mail to John.	S.D.	150.00	1.00	\$150.00
7/2/2020	Prepare for team call; team call	D.S.	550.00	.40	\$220.00
7/2/2020	Update spreadsheet re 2018-2020 OAL Decisions.	A.R.	150.00	1.70	\$255.00
7/2/2020	Attention to email from SD re class action file for companion case; attention to ECF notices; attention to PLaintiff letter to court re OTSC; attention to reading Defendant response to OTSC; attention to reading Defendant letter to court re Plaintiff's letter	L.G.	200.00	2.00	\$400.00
7/2/2020	Review/revise draft letter to Judge Hillman	D.S.	550.00	.80	\$440.00
7/2/2020	Attention to docket notices from court/review of cert in support of pro hoc vice and letter to Judge Hillman from Plaintiffs/ Repollet's response to order to show cause/Resiman billing submission.	S.Q.E.	500.00	1.10	\$550.00
7/2/2020	Update spreadsheet re 2018-2020 OAL Decisions cont.	A.R.	150.00	3.40	\$510.00
7/2/2020	Legal research re consolidation; legal research re staying cases; legal research re mootness when a similar class is certified; discussions with co-counsel; discussions with counsel for JA; drafting and filing letter to Judge Hillman.	J.D.R.	690.00	6.70	\$4,623.00
7/3/2020	Review/Format/Uplaod Docket Entry re J.A. Docket, Fwd to John/Pollock.	S.D.	150.00	.20	\$30.00
7/3/2020	Attention to email re. class action billing.	S.Q.E.	500.00	.10	\$50.00

7/5/2020	Attention to emails to and from client regarding federal case (meeting request).	S.Q.E.	500.00	.60	\$300.00
7/5/2020	Consultation with amici counsel; attention to recent factual developments in OAL and consideration of further emergent motion practice.	J.D.R.	690.00	3.30	\$2,277.00
7/5/2020	Reviewed complaint and answer to determine which allegations in complaint, although denied by Defendants, should be deemed admitted in preparation for motion for summary judgment	F.X.G.	400.00	6.00	\$2,400.00
7/5/2020	Legal research on causes of action; consultation with co-counsel,;	J.D.R.	690.00	4.50	\$3,105.00
7/6/2020	Telephone conference with J. Rue in anticipation of call later in day	D.S.	550.00	.20	\$110.00
7/6/2020	Updating OAL Decisions spreadsheet.	A.R.	150.00	.70	\$105.00
7/6/2020	Updating OAL Decisions spreadsheet cont.	A.R.	150.00	1.40	\$210.00
7/6/2020	Discussion re: Fee Waiver Case	D.S.	550.00	.50	\$275.00
7/6/2020	Attention to potential complaint.	S.Q.E.	500.00	.60	\$300.00
7/6/2020	Conference Call with Non-Profits	D.S.	550.00	.60	\$330.00
7/6/2020	Call with non-profits about participation in new action; attention to legal research re various causes of action.	J.D.R.	690.00	4.50	\$3,105.00
7/7/2020	Telephone call with J. Rue re: funding for class action	D.S.	550.00	.10	\$55.00

7/7/2020	Updating OAL decisions spreadsheet.	A.R.	150.00	.90	\$135.00
7/7/2020	Call from John re OAL decisions spreadsheet, updating OAL decisions spreadsheet.	A.R.	150.00	1.10	\$165.00
7/7/2020	Attention to agenda for case strategy/attention to case strategy for potential copy cat class action complaint/attention to pending status call with class action plaintiffs.	S.Q.E.	500.00	1.30	\$650.00
7/7/2020	Prepare for team call; team call	D.S.	550.00	1.10	\$605.00
7/7/2020	Updating OAL decisions spreadsheet.	A.R.	150.00	3.60	\$540.00
7/7/2020	Discovery strategy & planning; legal research re same; consult with co-counsel; consult with amici.	J.D.R.	690.00	4.80	\$3,312.00
7/8/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
7/8/2020	Review/Format/Upload Docket Text Order re J.A. Def. Letter re Time to Answer.	S.D.	150.00	.10	\$15.00
7/8/2020	Working on OAL Decisions Spreadsheet cont., E-Mail to Anne re OAL Decisions Assignment.	S.D.	150.00	.30	\$45.00
7/8/2020	Checking Status of OAL Decisions Assignment, Working on OAL Decisions Spreadsheet.	S.D.	150.00	.70	\$105.00
7/8/2020	Attention to recording of attorney fees from plaintiffs' counsel.	S.Q.E.	500.00	.30	\$150.00
7/8/2020	Updating OAL decisions spreadsheet.	A.R.	150.00	1.00	\$150.00

7/8/2020	Updating OAL decisions spreadsheet cont.	A.R.	150.00	5.30	\$795.00
7/8/2020	Team call; preparation for and follow-up to same. Calls with non-profits to discuss direct participation; preparation for and follow-up to same.	J.D.R.	690.00	5.00	\$3,450.00
7/8/2020	Further attention to discovery planning; attention to developments on the docket.	J.D.R.	690.00	3.50	\$2,415.00
7/9/2020	Working on OAL Decisions Spreadsheet.	S.D.	150.00	.20	\$30.00
7/9/2020	Working on OAL Decisions Spreadsheet.	S.D.	150.00	.20	\$30.00
7/9/2020	Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	.20	\$30.00
7/9/2020	Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	.20	\$30.00
7/9/2020	Creating New 23b3 Class Action Matter on Casefox, Migrating Wright Class Action Files, Updating Case Tracking.	S.D.	150.00	.20	\$30.00
7/9/2020	Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	.40	\$60.00
7/9/2020	Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	.60	\$90.00
7/9/2020	Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	.90	\$135.00
7/9/2020	Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	1.00	\$150.00

7/9/2020	Review/Format/Upload Docket Entry re J.A Response Brief, Fwd to John/Don, Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	1.00	\$150.00
7/9/2020	Updating OAL decisions spreadsheet.	A.R.	150.00	1.50	\$225.00
7/9/2020	Review of draft of initial disclosures/emails re. same/review of attorney fee agreement/attention to same/attention to potential call with class action plaintiffs providing updates since 5/22/20.	S.Q.E.	500.00	.90	\$450.00
7/9/2020	Updating OAL decisions spreadsheet cont., call from Saran re Class Action attorneys' fees and expenses.	A.R.	150.00	5.20	\$780.00
7/9/2020	Finalizing revision to agreement between plaintiffs' firms; Drafting 26(a)(1) disclosures; Further attention to analysis of OAL decisions 2018-20.	J.D.R.	690.00	4.50	\$3,105.00
7/10/2020	Updating Defendants' adjournment requests spreadsheet.	A.R.	150.00	.30	\$45.00
7/10/2020	Working on OAL Decisions Spreadsheet cont.	S.D.	150.00	.40	\$60.00
7/10/2020	Following up with attorneys re fees agreement / billing hours, updating OAL Decisions spreadsheet.	A.R.	150.00	.50	\$75.00
7/10/2020	Emailing Sean re attorneys' fees / expenses, checking email for attorneys' signatures for fees agreement, downloading signatures.	A.R.	150.00	.60	\$90.00
7/10/2020	Attention to counsel signatures regarding attorneys' fees agreement/attention to new class action causes of action.	S.Q.E.	500.00	1.00	\$500.00
7/10/2020	Formatting / updating Defendants' adjournment requests spreadsheet, updating OAL Decisions spreadsheet, email Saran re update on attorneys' signatures for fees agreement.	A.R.	150.00	4.00	\$600.00
7/10/2020	Consultation with amici re ongoing issues in the OAL; preparation for meetings, and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00

7/10/2020	Further attention to preliminary research re causes of action; memorandum to consulting attorney re same.	J.D.R.	690.00	6.50	\$4,485.00
7/13/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
7/13/2020	Updating OAL Decisions spreadsheet.	A.R.	150.00	.30	\$45.00
7/13/2020	Attention to Billing Records from Counsel.	S.D.	150.00	.30	\$45.00
7/13/2020	Formatting Billing Records from Counsel cont.	S.D.	150.00	.30	\$45.00
7/13/2020	Attention to securing final attorneys' signatures for fee agreement.	S.Q.E.	500.00	.40	\$200.00
7/13/2020	Attention to negotiation with co-counsel re agreement.	J.D.R.	690.00	.80	\$552.00
7/13/2020	Updating OAL Decisions spreadsheet cont., following up with attorneys re fees agreement signatures / billing hours.	A.R.	150.00	4.50	\$675.00
7/13/2020	Further attention to causes of action, and drafting initial complaint.	J.D.R.	690.00	2.20	\$1,518.00
7/14/2020	Research re E.E. v. Ridgefield, Sending DNJ Opinion/OAL Decision to John/Don.	S.D.	150.00	.30	\$45.00
7/14/2020	Combining signatures for Fees Agreement, emailing signed Fees Agreement to John.	A.R.	150.00	.40	\$60.00
7/14/2020	Attention to attorney fee agreement signatures.	S.Q.E.	500.00	.30	\$150.00

7/14/2020	Drafting Complaint.	S.D.	150.00	1.20	\$180.00
7/14/2020	Updating Def. Adjournment Requests Spreadsheet.	A.R.	150.00	1.70	\$255.00
7/14/2020	Updating Def. Adjournment Requests Spreadsheet cont., emailing it to John, tidying up OAL Decisions spreadsheet.	A.R.	150.00	2.10	\$315.00
7/14/2020	Attention to upcoming meeting/case strategy/emails re. same/ attention to drafting synopsis of court proceedings since 5/22/20 for potential meeting with clients re. same.	S.Q.E.	500.00	1.50	\$750.00
7/14/2020	Attention to summary judgment planning.	J.D.R.	690.00	2.50	\$1,725.00
7/14/2020	Further attention to strategy and planning; legal research.	J.D.R.	690.00	4.50	\$3,105.00
7/15/2020	Review/Format/Upload Docket Entry re Notice of Appearance, Fwd to John.	S.D.	150.00	.10	\$15.00
7/15/2020	Review/Format/Upload Docket Entry re J.A. Matter, Fwd to John/Don.	S.D.	150.00	.10	\$15.00
7/15/2020	Attention to ECF notice	L.G.	200.00	.10	\$20.00
7/15/2020	Drafting Complaint cont.	S.D.	150.00	.30	\$45.00
7/15/2020	Drafting Complaint cont.	S.D.	150.00	.30	\$45.00
7/15/2020	Drafting Complaint cont.	S.D.	150.00	.60	\$90.00



7/15/2020	Drafting Complaint cont.	S.D.	150.00	.70	\$105.00
7/15/2020	Attention to strategy.	J.D.R.	690.00	.30	\$207.00
7/15/2020	Drafting Complaint cont.	S.D.	150.00	1.40	\$210.00
7/15/2020	Finalization of synopsis of proceedings since 5-22-20/email to John re. same./Attention to engagement agreements for new plaintiffs/amendments to current engagements.	S.Q.E.	500.00	.70	\$350.00
7/15/2020	Attention to filings and developments in JA.	J.D.R.	690.00	1.10	\$759.00
7/16/2020	Locating/Forwarding List of Plaintiffs to Saran.	S.D.	150.00	.10	\$15.00
7/16/2020	Drafting Complaint cont., Sending to John/E-Mails w John re Complaint.	S.D.	150.00	.20	\$30.00
7/16/2020	Attention to new plaintiff engagement agreements.	S.Q.E.	500.00	.20	\$100.00
7/16/2020	attention to attorneys' signatures for fee agreement/attention to firms' billable hours thus far.	S.Q.E.	500.00	.30	\$150.00
7/16/2020	Drafting Complaint cont.	S.D.	150.00	1.40	\$210.00
7/16/2020	Attention to gaining access to final decisions.	J.D.R.	690.00	1.00	\$690.00
7/16/2020	Further attention to research and preliminary issues.	J.D.R.	690.00	2.50	\$1,725.00

7/16/2020	Communications with co-counsel; drafting amended co-counsel agreement; attention to progress of and developments in JA case.	J.D.R.	690.00	3.00	\$2,070.00
7/17/2020	Following up with attorneys re billing hours.	A.R.	150.00	.10	\$15.00
7/20/2020	Email Dwyer re billing hours.	A.R.	150.00	.10	\$15.00
7/20/2020	Updating Class Action Docket.	S.D.	150.00	.10	\$15.00
7/20/2020	Review/Format/Upload Docket Entry re J.A. Matter/Docket Entry re Def. Letter re Gran Application Pro Hac Vice, Fwd to John/Don/Pollock.	S.D.	150.00	.20	\$30.00
7/20/2020	Attention to letter from njdoe re Gran pro hac application.	J.D.R.	690.00	.40	\$276.00
7/20/2020	Attention finalization of attorneys? signature and billable hours spreadsheet/review of same.	S.Q.E.	500.00	.60	\$300.00
7/22/2020	Call with John/Saran re Dwyer documents.	A.R.	150.00	.10	\$15.00
7/22/2020	Reviewing Dwyer documents.	A.R.	150.00	1.70	\$255.00
7/22/2020	Reviewing Dwyer documents cont.	A.R.	150.00	2.00	\$300.00
7/22/2020	Review draft synopsis of updates and developments for clients.	J.D.R.	690.00	.80	\$552.00
7/22/2020	Attention to FOI docs/review of same.	S.Q.E.	500.00	1.60	\$800.00

7/22/2020	Attention to documents obtained under FOIA.	J.D.R.	690.00	1.50	\$1,035.00
7/22/2020	Review Defendants' Answer and Draft Motion for Summary Judgment and Permanent Injunction	F.X.G.	400.00	5.00	\$2,000.00
7/23/2020	Calls w Saran re Formatting Proceedings Synopsis, Assisting w Formatting.	S.D.	150.00	.10	\$15.00
7/23/2020	Editing attorneys' fees/expenses spreadsheet.	A.R.	150.00	.30	\$45.00
7/23/2020	Editing attorneys' fees/expense spreadsheet.	A.R.	150.00	3.70	\$555.00
7/23/2020	Attention to need for file update to website post 5/28/20 (re. court docs)/attention to FOIA response review and emails regarding same/attention to finalizing synopsis for plaintiffs.	S.Q.E.	500.00	1.80	\$900.00
7/23/2020	Attention to client communications, status and developments; discovery strategy and planning.	J.D.R.	690.00	2.50	\$1,725.00
7/23/2020	Drafting Motion for Summary Judgment and Permanent Injunction	F.X.G.	400.00	5.00	\$2,000.00
7/24/2020	Reviewing Dwyer documents cont.	A.R.	150.00	.60	\$90.00
7/24/2020	Review iterative timesheets.	J.D.R.	690.00	.50	\$345.00
7/24/2020	Reviewing Dwyer documents cont., email Saran re documents, attention to Saran email re Doodle poll for conference call, sending Doodle poll to plaintiffs/Saran.	A.R.	150.00	2.20	\$330.00

7/24/2020	Editing attorneys' fees/expenses spreadsheet, sending contact list to Saran, reviewing Dwyer documents.	A.R.	150.00	2.60	\$390.00
7/24/2020	Attention to plaintiffs? contact information for email distribution of synopsis (legal proceedings since 5/22/20)/email to clients re. same/attention to doodle poll distributioin re. Zoom meeting during week of 8/3/20/emails re. same.	S.Q.E.	500.00	1.00	\$500.00
7/24/2020	Further attention to drafting complaint.	J.D.R.	690.00	3.30	\$2,277.00
7/25/2020	Attention to strategy re related case.	J.D.R.	690.00	1.50	\$1,035.00
7/26/2020	Attention to appeals pursuant to Rule 54B.	S.Q.E.	500.00	.50	\$250.00
7/26/2020	Attention to developments in JA case.	J.D.R.	690.00	1.50	\$1,035.00
7/27/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
7/27/2020	Attention to meeting re. due process violations.	S.Q.E.	500.00	.40	\$200.00
7/27/2020	Attention to FRCP 54(B) research and potential applicability.	S.Q.E.	500.00	1.30	\$650.00
7/27/2020	Coordinating review of documents obtained by FOIA request.	J.D.R.	690.00	1.00	\$690.00
7/27/2020	Consultations with co-counsel re coordination with JA case; consolidation research and strategy.	J.D.R.	690.00	2.00	\$1,380.00

7/28/2020	Attention to emails re. FOIA records.	S.Q.E.	500.00	.30	\$150.00
7/28/2020	Correspondence with NPR education correspondent regarding case.	W.I.P.	500.00	.40	\$200.00
7/28/2020	Attention to meeting re. due process violations in the OAL.	S.Q.E.	500.00	.40	\$200.00
7/28/2020	Reviewing Dwyer documents cont.	A.R.	150.00	1.30	\$195.00
7/28/2020	Reviewing Dwyer documents.	A.R.	150.00	1.50	\$225.00
7/29/2020	Attention to Billing re Updated O'Leary Hours.	S.D.	150.00	.50	\$75.00
7/29/2020	Editing spreadsheet re attorneys' fees/expenses.	A.R.	150.00	.60	\$90.00
7/29/2020	Reviewing Dwyer documents cont.	A.R.	150.00	1.60	\$240.00
7/29/2020	Editing spreadsheet re attorneys' fees/expenses cont., reviewing Dwyer documents.	A.R.	150.00	2.80	\$420.00
7/29/2020	Attention to 7/29/20 committee meeting re. due process violations in the OAL/call/emails re. same/attention to emails.	S.Q.E.	500.00	1.70	\$850.00
7/30/2020	Creating Doodle Poll re Plaintiffs' Availability for Call cont., E-Mail to Saran.	S.D.	150.00	.10	\$15.00
7/30/2020	Call from Saran re Plaintiff's Conference Call, Creating Doodle Poll re Availability for Call.	S.D.	150.00	.20	\$30.00

7/30/2020	Attention to rescheduling meeting with class action plaintiffs/rescheduling of same.	S.Q.E.	500.00	.70	\$350.00
7/31/2020	Reviewing Dwyer documents.	A.R.	150.00	1.50	\$225.00
8/4/2020	Call with co-counsel re strategy. Follow-up to same.	J.D.R.	690.00	1.10	\$759.00
8/7/2020	Attention to Rule 54(b) research.	S.Q.E.	500.00	1.60	\$800.00
8/10/2020	Updating Docket Report.	S.D.	150.00	.20	\$30.00
8/11/2020	Call from Saran re Plaintiff Call Scheduling, Checking Doodle Poll Status re Pltf Availability.	S.D.	150.00	.10	\$15.00
8/11/2020	Updating spreadsheet re attorneys fees and expenses.	A.R.	150.00	.30	\$45.00
8/11/2020	Attention to class action plaintiffs? call/emails/calls re. same/Rule 54(b) research.	S.Q.E.	500.00	1.40	\$700.00
8/12/2020	Attention to text order	L.G.	200.00	.10	\$20.00
8/12/2020	Review/Format/Upload Text Order re Additional Briefing.	S.D.	150.00	.20	\$30.00
8/12/2020	Updating Calendar/Case Tracking re Text Order re Additional Briefing.	S.D.	150.00	.30	\$45.00
8/12/2020	Attention to John email re attorneys' billing, updating spreadsheet re attorneys fees and expenses, emailing attorneys re billing hours re matter, emailing updated spreadsheet to John.	A.R.	150.00	1.10	\$165.00

8/12/2020	Case management; scheduling update calls with named plaintiffs	J.D.R.	690.00	.60	\$414.00
8/12/2020	Attention to Fed. R. Civ. 54(b) certification research and review of recent case law regarding same/attention to email re. attorney time-keeping/attention to text order/attention to call with class action plaintiffs.	S.Q.E.	500.00	3.40	\$1,700.00
8/13/2020	E-Mail from Saran, Attention to Doodle Poll re Client Availability for Call, E-Mail to Saran.	S.D.	150.00	.10	\$15.00
8/13/2020	Looking into Issues re Plaintiff's Doodle Poll re Availability for Call, E-Mail to M.S. re Client Issues w Doodle.	S.D.	150.00	.30	\$45.00
8/13/2020	Attention to plaintiffs? pending Zoom meeting/calls/emails re. same	S.Q.E.	500.00	1.10	\$550.00
8/14/2020	Attention to ECF notice granting motion appear pro hac vice	L.G.	200.00	.10	\$20.00
8/15/2020	Attention to arranging Zoom meeting with clients on 8/17/20/emails re. same.	S.Q.E.	500.00	.40	\$200.00
8/17/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
8/17/2020	Call from D.O. re Zoom Meeting, Fwd Meeting Link to Client.	S.D.	150.00	.10	\$15.00
8/17/2020	Review/Format/Upload Docket Entry Granting Gran Leave to Appear, Fwd to John.	S.D.	150.00	.20	\$30.00
8/17/2020	Call from M.S. re Zoom Meeting, Call to Don, E-Mail to Don/John/Saran, Call back from Client, Call/E-Mail to John.	S.D.	150.00	.20	\$30.00

8/17/2020	Call from Saran re Client List, Attention to Files re Plaintiffs, E-Mail to Saran.	S.D.	150.00	.20	\$30.00
8/17/2020	Attention to zoom meeting with Plaintiffs on 8/17/20/attendance at same.	S.Q.E.	500.00	1.20	\$600.00
8/17/2020	Team call; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
8/18/2020	Attention to Zoom meeting on 8/17/20.	S.Q.E.	500.00	.20	\$100.00
8/18/2020	Attention to engagement agreement drafting.	S.Q.E.	500.00	.40	\$200.00
8/19/2020	E-Mail from Saran, Downloading Zoom Recording re Class Action Zoom Meetings, Uploading to Sharepoint.	S.D.	150.00	.10	\$15.00
8/20/2020	Attention to Fed. R. Civ. P. 54(b) research.	S.Q.E.	500.00	1.00	\$500.00
8/21/2020	Assigning associate to drafting brief.	J.D.R.	690.00	.60	\$414.00
8/21/2020	Attention to Rule 54(b) research.	S.Q.E.	500.00	1.00	\$500.00
8/21/2020	Case management -- assignment of tasks to junior team.	J.D.R.	690.00	1.00	\$690.00
8/22/2020	Attention to Rule 54(b) certification research.	S.Q.E.	500.00	1.40	\$700.00
8/23/2020	Attention to finalizing Rule 54 certification research and summary of same.	S.Q.E.	500.00	1.10	\$550.00



8/23/2020	Further attention to preliminary issues; research; communications with co-counsel.	J.D.R.	690.00	1.50	\$1,035.00
8/24/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
8/24/2020	Attention to Zoom meeting on 8/17/20 with plaintiffs/ Attention to rule 54(b) research/attention to 8/17/20 zoom meeting follow up to plaintiffs.	S.Q.E.	500.00	2.10	\$1,050.00
8/25/2020	Review/Format/Upload Revised Agreement re Fees.	S.D.	150.00	.10	\$15.00
8/25/2020	Attention to Saran email re email to clients, sending email re Class Action meeting review to plaintiffs.	A.R.	150.00	.20	\$30.00
8/25/2020	Attention to email drafting to plaintiffs.	S.Q.E.	500.00	.20	\$100.00
8/25/2020	Attention to strategy and czase planning re remedies; communication with co-counsel re same.	J.D.R.	690.00	.20	\$138.00
8/26/2020	E-Mail from Saran, Researching Legal Citation re Motions, E-Mail to Saran.	S.D.	150.00	.60	\$90.00
8/26/2020	Researched and drafted letter brief in support of consolidating preliminary injunction with merits hearing and in support of expedited hearing	F.X.G.	400.00	2.00	\$800.00
8/27/2020	Call from John re Formatting of Brief, Editing Brief re Formatting Errors, Sending to John.	S.D.	150.00	.70	\$105.00
8/27/2020	Drafted letter brief in support of consolidating Plaintiffs' Motion for Preliminary Injunction with merits hearing as well as in support of expedited merits hearing	F.X.G.	400.00	1.50	\$600.00
8/29/2020	Attention to email re FOIA documents.	S.Q.E.	500.00	.10	\$50.00

8/31/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
8/31/2020	Attention to gathering team comments on brief in support of expedited trial.	J.D.R.	690.00	1.50	\$1,035.00
9/1/2020	Attention to Saran email re FOIA response documents.	A.R.	150.00	.10	\$15.00
9/2/2020	Revise draft brief	D.S.	550.00	1.40	\$770.00
9/3/2020	Review/Format/Upload Docket Entry re Brief re Request for Consolidation, Fwd to John.	S.D.	150.00	.10	\$15.00
9/3/2020	Attention to docket entry notice.	S.Q.E.	500.00	.10	\$50.00
9/3/2020	Finalize and file brief	D.S.	550.00	.30	\$165.00
9/3/2020	Review/revise/finalize draft brief, including legal research to locate missing/needed citations	D.S.	550.00	3.90	\$2,145.00
9/8/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
9/8/2020	Attention to ECF notice	L.G.	200.00	.10	\$20.00
9/14/2020	Updating Docket Report.	S.D.	150.00	.20	\$30.00
9/16/2020	Attention to potential class action plaintiffs zoom meeting on 9/21/20.	S.Q.E.	500.00	.70	\$350.00

9/17/2020	Review/Format/Upload Docket Entry re Notice of Appearance, Fwd to John.	S.D.	150.00	.10	\$15.00
9/17/2020	Attention to ECF notice; emails from co-counsel re filing	L.G.	200.00	.80	\$160.00
9/18/2020	Attention to ECF notice	L.G.	200.00	.10	\$20.00
9/19/2020	Attention to firm billing summaries.	S.Q.E.	500.00	.10	\$50.00
9/19/2020	Consultation with co-counsel about potential related case filing.	J.D.R.	690.00	1.50	\$1,035.00
9/20/2020	Attention to docket entry of defendant's brief opposing consolidation with an expedited trial/email to clients re case updated/Zoom meeting schedule going forward.	S.Q.E.	500.00	.60	\$300.00
9/21/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
9/21/2020	Review/Format/Upload Docket Entry re Def. Opposition to Motion to Consolidate, Fwd to John.	S.D.	150.00	.10	\$15.00
9/21/2020	Creating Doodle Poll re Plaintiff Call.	S.D.	150.00	.20	\$30.00
9/21/2020	Attention to case strategy.	S.Q.E.	500.00	.10	\$50.00
9/21/2020	Call from John re attorneys fees spreadsheet, editing spreadsheet.	A.R.	150.00	.60	\$90.00
9/21/2020	Attention to DOE filing re: PI, consolidation and discovery	L.Q.	500.00	.30	\$150.00

9/21/2020	Attention to ECF notice from court; attention to reading supplemental brief in opposition to consolidation; attention to email re class action strategy call	L.G.	200.00	.80	\$160.00
9/22/2020	Creating Doodle Poll re Counsel Conference Call.	S.D.	150.00	.10	\$15.00
9/22/2020	Review of Plaintiffs' reply brief.	S.Q.E.	500.00	.20	\$100.00
9/23/2020	Review/Format/Upload Docket Entries re Jensen Notice of Withdrawal, Fwd to John.	S.D.	150.00	.10	\$15.00
9/23/2020	Scheduling Conference Call/Sending Calendar Invites.	S.D.	150.00	.10	\$15.00
9/23/2020	Attention to ECF notices from court	L.G.	200.00	.30	\$60.00
9/23/2020	Attention to emails re. Plaintiffs' latest filings.	S.Q.E.	500.00	.70	\$350.00
9/24/2020	Conference call.	A.R.	150.00	.50	\$75.00
9/24/2020	Attention to ECF notice from court; attention to plaintiff brief in further support of consolidation	L.G.	200.00	.40	\$80.00
9/24/2020	Attention to emails from other counsel re potential related suit and discovery	L.G.	200.00	.50	\$100.00
9/24/2020	TC with counsel re: D. Giles case and review of Plaintiffs response re: PI and consolidation	L.Q.	500.00	.50	\$250.00
9/24/2020	Attention to notice from court, plaintiff filing, preliminary discovery requests and TC with counsel	L.Q.	500.00	.50	\$250.00

9/24/2020	Attention to meeting attendance/note taking/emails re. filings.	S.Q.E.	500.00	.60	\$300.00
9/25/2020	Review/Format/Upload Clerk Notice/Docket Entries re Notices of Withdrawal/Brief in Support of Consolidation, Fwd to John.	S.D.	150.00	.20	\$30.00
9/25/2020	Attention to emails re discovery and attached draft documents	L.G.	200.00	.50	\$100.00
9/25/2020	Review of plaintiffs' filing/email re. same	S.Q.E.	500.00	.30	\$150.00
9/28/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
9/28/2020	Attention to ECF notice from court	L.G.	200.00	.10	\$20.00
9/29/2020	E-Mail from John, Uploading Discovery Demand Documents to Sharepoint.	S.D.	150.00	.10	\$15.00
10/5/2020	Updating Docket Report.	S.D.	150.00	.10	\$15.00
10/5/2020	Attention to email.	S.Q.E.	500.00	.10	\$50.00
10/5/2020	Attention to correspondence from JDR re: Doe complaint	L.Q.	500.00	.10	\$50.00
10/6/2020	Editing spreadsheet re attorneys' fees and expenses, sending spreadsheet to John.	A.R.	150.00	.70	\$105.00
10/6/2020	Attention to strategy and case planning re remedies; communication with co-counsel re same.	J.D.R.	690.00	.20	\$138.00

10/8/2020	Close attention to issues re remedies available; communication with co-counsel re same.	J.D.R.	690.00	2.50	\$1,725.00
10/15/2020	Attention to email re. E.K. filing/review of corresponding docs.	S.Q.E.	500.00	.20	\$100.00
10/15/2020	Attention to related complaint and accompanying documents filed in Fed. Court	L.Q.	500.00	.30	\$150.00
10/16/2020	Attention to emails between co-counsel re case	L.G.	200.00	.30	\$60.00
10/16/2020	Attention to emails/attention to potential meeting.	S.Q.E.	500.00	.40	\$200.00
10/19/2020	Creating Doodle Poll re Counsel Call cont.	S.D.	150.00	.10	\$15.00
10/19/2020	Creating Doodle Poll re Counsel Conference Call.	S.D.	150.00	.20	\$30.00
10/20/2020	Attention to emails with co-counsel re case	L.G.	200.00	.40	\$80.00
10/20/2020	Attention to emails.	S.Q.E.	500.00	.20	\$100.00
10/20/2020	Further attention to remedies and scope of complaint; legal research.	J.D.R.	690.00	1.50	\$1,035.00
10/25/2020	Attention to email re. follow-on class action.	S.Q.E.	500.00	.20	\$100.00
11/24/2020	Attention to order re. motion to certify class.	S.Q.E.	500.00	.50	\$250.00

11/25/2020	Review/Format Docket Entries re Order/Opinion Denying Motion to Certify Class, Fwd to John.	S.D.	150.00	.20	\$30.00
11/25/2020	Attention to Court decision, order and team communications	L.Q.	500.00	.30	\$150.00
11/30/2020	Prepare for and participate in Team Call (did not participate in full call)	D.S.	550.00	1.00	\$550.00
12/1/2020	Review email traffic and confer internally re: same; phone call to discuss responses to adversary; review/revise draft Consent Order	D.S.	550.00	.40	\$220.00
12/2/2020	E-Mail from John, Finalizing/E-Filing Rue Letter to Judge re Rule 16 Scheduling Conference, Review/Format/Upload Docket Entry, Fwd to John.	S.D.	150.00	.30	\$45.00
12/2/2020	Attention to Plaintiffs' letter filed on 12/2/20.	S.Q.E.	500.00	.20	\$100.00
12/2/2020	Discovery planning; drafting letter to judge.	J.D.R.	690.00	3.50	\$2,415.00
12/3/2020	Review/Format/Upload Text Order Resetting Initial Conference, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
12/3/2020	Attention to docket entry re.intiial telephone conference scheduled for 12/17/20.	S.Q.E.	500.00	.10	\$50.00
12/4/2020	Attention to NJ IDEA funding document and use in class action lawsuit	L.Q.	500.00	.30	\$150.00
12/9/2020	Call from John re Files, Attention to Files re OAL Decisions.	S.D.	150.00	.10	\$15.00
12/9/2020	Working on Spreadsheet re OAL Decisions cont.	S.D.	150.00	.30	\$45.00

12/9/2020	Attention to Files re OPRA Requests, Call w John re Research Files, Updating Spreadsheet re OAL Decisions.	S.D.	150.00	.40	\$60.00
12/9/2020	Working on Spreadsheet re OAL Decisions cont.	S.D.	150.00	.60	\$90.00
12/9/2020	Emails, including brief research, regarding Rule 16 Conference	D.S.	550.00	.30	\$165.00
12/9/2020	Further attention to discovery plan; legal research re same; correspondence with opposing counsel re same.	J.D.R.	690.00	3.50	\$2,415.00
12/10/2020	Attention to John Question re OAL Decisions Spreadsheet, E-Mail to John.	S.D.	150.00	.10	\$15.00
12/11/2020	attention to 12/12/20 call at 8:30 re. discovery action plan.	S.Q.E.	500.00	.10	\$50.00
12/11/2020	Emails with opposing counsel re R16 conference; discussions with co-counsel re strategy and planning; legal research.	J.D.R.	690.00	4.30	\$2,967.00
12/12/2020	Team Conference to prepare for Rule 26 F conference, proposed joint discovery plan, an Rule 16 conference	D.S.	550.00	1.80	\$990.00
12/12/2020	Discovery Action Call (1.6)/emails re. Discovery plan, etc.	S.Q.E.	500.00	2.00	\$1,000.00
12/12/2020	Review/revise draft proposed joint discovery plan; review/revise draft Confidentiality Order	D.S.	550.00	2.50	\$1,375.00
12/12/2020	Attention to drafting discovery plan; attention to draft ESI stipulation; attention to legal research re expedited discovery; attention to legal research re bifurcated trial; attention to drafting confidentiality order.	J.D.R.	690.00	6.50	\$4,485.00



12/13/2020	Attention to emails re. Discovery plan/drafts of same.	S.Q.E.	500.00	1.10	\$550.00
12/13/2020	Review/revise draft ESI Protocol	D.S.	550.00	1.40	\$770.00
12/13/2020	further attention to discovery plan, confidentiality order, ESI protocol, correspondence with adversary re same.	J.D.R.	690.00	6.00	\$4,140.00
12/14/2020	Further Attention to E-Mails re Strategy.	S.D.	150.00	.10	\$15.00
12/14/2020	Attention to Correspondence re Counsel Availability, E-Mail to John.	S.D.	150.00	.10	\$15.00
12/14/2020	Attention to E-Mail Chain re Strategy, Setting up Sharefile Folder re "Hot Docs," E-Mail to Don, Downloading Docket Report, Review/Format/Upload Docket Report.	S.D.	150.00	.40	\$60.00
12/14/2020	Attention to proposed ESI; correspondence among team and from opposing counsel; litigation strategy discussion	L.Q.	500.00	.50	\$250.00
12/14/2020	Attention to emails/attention to discovery plan correspondence to and from adversary (K.S.).	S.Q.E.	500.00	1.00	\$500.00
12/14/2020	Further attention to discovery planning; call with adversary (26f conference); legal research re confidentiality re 26a disclosures.	J.D.R.	690.00	4.20	\$2,898.00
12/15/2020	Emails re: presentation at administrative law CLE	D.S.	550.00	.10	\$55.00
12/15/2020	Attention to Proposed Discovery Plan; OAG correspondence; team discussion of strategy	L.Q.	500.00	.40	\$200.00
12/15/2020	Attention to emails re. discovery plan.	S.Q.E.	500.00	1.30	\$650.00

12/15/2020	Legal research re scope of discovery; preparation for Rule 16 conference.	J.D.R.	690.00	5.50	\$3,795.00
12/16/2020	Zoom Conference with J. Rue re: management of team resources	D.S.	550.00	.20	\$110.00
12/16/2020	Review/comment on draft proposal re: management of team resources	D.S.	550.00	.20	\$110.00
12/16/2020	Attention to emails to and from adversary re. discovery plan/review of recised discovery plan.	S.Q.E.	500.00	1.20	\$600.00
12/16/2020	Finalizing discovery plan; coordination of case team; emails and call with DAG Soranno.	J.D.R.	690.00	4.50	\$3,105.00
12/17/2020	Review talking points in anticipation of Rule 16 Conference	D.S.	550.00	.20	\$110.00
12/17/2020	Attention to preparation for scheduling conference	L.Q.	500.00	.30	\$150.00
12/17/2020	Confer with J. Rue re: follow-up to Rule 16 Conference	D.S.	550.00	.30	\$165.00
12/17/2020	Attention to emails re. discovery plan, review of plan prior to submission to court. Emails re. meeting request re. same.	S.Q.E.	500.00	.70	\$350.00
12/17/2020	Team strategy call to discuss final preparation for Rule 16 conference; review final proposed joint discovery plan in preparation for Rule 16 Conference	D.S.	550.00	1.10	\$605.00
12/17/2020	Rule 16 conference; preparation for and follow-up to same; discovery planning and strategy.	J.D.R.	690.00	8.50	\$5,865.00
12/18/2020	Update call with counsel for amici.	J.D.R.	690.00	.80	\$552.00

12/18/2020	Attention to motion drafting.	J.D.R.	690.00	1.80	\$1,242.00
12/18/2020	Discovery planning and drafting; attention to scheduling order.	J.D.R.	690.00	2.50	\$1,725.00
12/20/2020	Attention to discovery research and drafting.	J.D.R.	690.00	1.10	\$759.00
12/21/2020	Downloading Docket Report from PACER.	S.D.	150.00	.10	\$15.00
12/21/2020	Attention to Files re Billing Records, Sending Attorney Hours Spreadsheet to Beth.	S.D.	150.00	.10	\$15.00
12/21/2020	Review/Format/Upload Docket Entry re Scheduling Order, Updating Calendar/Case Tracking, Fwd to John.	S.D.	150.00	.30	\$45.00
12/21/2020	E-Mails w/ John/Beth/Don re Billing Meeting, Zoom Meeting re Billing.	S.D.	150.00	.30	\$45.00
12/22/2020	Attention to discussion and correspondence re: settlement strategy	L.Q.	500.00	.30	\$150.00
12/22/2020	Review of Plaintiffs' discovery requests and corresponding docs/email re. same.	S.Q.E.	500.00	1.00	\$500.00
12/22/2020	Further attention to draft settlement letter and proposed consent order.	J.D.R.	690.00	2.50	\$1,725.00
12/23/2020	E-Mail from John, Adjusting Casefox Entries re Staff Billing Rate Change.	S.D.	150.00	.40	\$60.00
12/23/2020	Attention to correspondence with opposing counsel re: settlement	L.Q.	500.00	.20	\$100.00

12/23/2020	Review/comment on rate sheet	D.S.	550.00	.30	\$165.00
12/23/2020	Attention to emails.	S.Q.E.	500.00	.40	\$200.00
12/29/2020	attention to Defendant's settlement offer/email re. same.	S.Q.E.	500.00	.20	\$100.00
12/30/2020	Downloading Docket Report.	S.D.	150.00	.10	\$15.00
12/31/2020	Attention to review of draft discovery requests; legal research re same.	J.D.R.	690.00	2.50	\$1,725.00
1/4/2021	Review/Format/Upload Docket Notice re Minute Entry, Downloading Docket Report.	S.D.	150.00	.30	\$45.00
1/4/2021	Call to Beth re Zoom Conference, Call to John, Checking E-Mail.	S.D.	150.00	.40	\$60.00
1/4/2021	Attention to emails.	S.Q.E.	500.00	.40	\$200.00
1/4/2021	Team call to discuss discovery	D.S.	550.00	.50	\$275.00
1/4/2021	Attention to discovery planning; meetings with co-counsel; attention to various legal research questions; preliminary attention to consolidation of related actions.	J.D.R.	690.00	6.50	\$4,485.00
1/5/2021	Call/E-Mail from John re Plaintiff Information to O'Leary re Discovery.	S.D.	150.00	.10	\$15.00
1/5/2021	Phone call with J. Rue re: project assignments	D.S.	550.00	.10	\$55.00

1/5/2021	Attention to and attendance at discovery zoom meeting.	S.Q.E.	500.00	.50	\$250.00
1/5/2021	Team Zoom call to discuss case and introduce new projects	D.S.	550.00	.70	\$385.00
1/5/2021	class action meeting with John	J.B.	400.00	1.00	\$400.00
1/5/2021	Discovery strategy, planning, and drafting; preliminary attention to various research assignments for junior team; conference with team re same; preliminary attention to consolidation motion; legal research re same.	J.D.R.	690.00	7.50	\$5,175.00
1/6/2021	Preparing Plaintiff Information to O'Leary, E-Mail to John re Plaintiffs.	S.D.	150.00	.70	\$105.00
1/7/2021	E-Mails from John re Plaintiffs/Latiah Contact Information, Call to Latiah re Plaintiff Case Files.	S.D.	150.00	.10	\$15.00
1/7/2021	Attention to E-Mails re Plaintiffs, Gathering Plaintiff Information cont., Sending to O'Leary.	S.D.	150.00	.10	\$15.00
1/7/2021	E-Mails re Plaintiffs, Uploading Client Documents to Sharepoint.	S.D.	150.00	.10	\$15.00
1/7/2021	E-Mails w John re Plaintiffs.	S.D.	150.00	.20	\$30.00
1/7/2021	Call to Latiah re Plaintiff Case Files, Sending Plaintiff Data to O'Leary, Updating Docket on Google Drive.	S.D.	150.00	.30	\$45.00
1/7/2021	Attention to emails.	S.Q.E.	500.00	.40	\$200.00

1/7/2021	Attention to gathering information to respond to discovery.	J.D.R.	690.00	3.50	\$2,415.00
1/8/2021	Respond to internal request for information	D.S.	550.00	.30	\$165.00
1/8/2021	Attention to recent DNJ authority; strategy.	J.D.R.	690.00	1.20	\$828.00
1/8/2021	Preliminary attention to legal research re consolidation.	J.D.R.	690.00	1.50	\$1,035.00
1/8/2021	Attention to issues re confidentiality agreement; correspondence with adversary.	J.D.R.	690.00	2.50	\$1,725.00
1/8/2021	Meeting with clients; follow-up to same. Further revisions to Gibbons letter.	J.D.R.	690.00	3.50	\$2,415.00
1/11/2021	E-Mail from O'Leary re Plaintiffs, Attention to Files, E-Mail to O'Leary.	S.D.	150.00	.10	\$15.00
1/11/2021	Updating Docket Report, Preparing Letter to Soranno re Settlement.	S.D.	150.00	.20	\$30.00
1/11/2021	Further Attention to E-Mails w/ O'Leary/Files re Plaintiffs.	S.D.	150.00	.30	\$45.00
1/11/2021	Attention to team discussion of claims for relief	L.Q.	500.00	.20	\$100.00
1/11/2021	Zoom with Don and Johanna re clients	M.P.C.	300.00	.50	\$150.00
1/11/2021	Prepare for call to discuss client management related to discovery	D.S.	550.00	.30	\$165.00

1/11/2021	Review/revise State's comments to ESI protocol and provide comments re: same	D.S.	550.00	.30	\$165.00
1/11/2021	class action- meeting with Don and Matt	J.B.	400.00	.50	\$200.00
1/11/2021	Zoom conference with J. Burke and M. Crimmel to discuss client communication and discovery planning	D.S.	550.00	.70	\$385.00
1/11/2021	Further attention to ESI stipulation.	J.D.R.	690.00	.80	\$552.00
1/11/2021	Research case law re discovery for class action	M.P.C.	300.00	2.00	\$600.00
1/12/2021	Attention to E-Mail from Thurston re Post-Hearing Briefing.	S.D.	150.00	.10	\$15.00
1/12/2021	E-Mail from John re Stipulated Confidentiality Order, Attention to Files, E-Filing on PACER, Review/Format/Upload Docket Entry re Proposed Order, Fwd to John.	S.D.	150.00	.40	\$60.00
1/13/2021	Review/Format/Upload Order re Stipulated Discovery Confidentiality, Fwd to John.	S.D.	150.00	.10	\$15.00
1/13/2021	Phone call with J. Rue re: responding to discovery	D.S.	550.00	.30	\$165.00
1/13/2021	Attention to meeting regarding class action plaintiffs, emails re. same/attention to court docket entry re. confidentiality order.	S.Q.E.	500.00	.50	\$250.00
1/13/2021	Preliminary attention to defendant's discovery demands; discovery strategy and planning; gathering information for discovery.	J.D.R.	690.00	4.50	\$3,105.00
1/14/2021	Updating Class Action OAL Decision Spreadsheet cont., Sending to John.	S.D.	150.00	.10	\$15.00

1/14/2021	E-Mails w Don/Saran re Schedule Call w Plaintiffs, Downloading Class Action Zoom Recording, Distributing Link to Counsel.	S.D.	150.00	.30	\$45.00
1/14/2021	Zoom with John re research questions	M.P.C.	300.00	.50	\$150.00
1/14/2021	E-Mail from John re OAL Decision Database, Updating OAL Decision Database to Current.	S.D.	150.00	1.00	\$150.00
1/14/2021	Review discovery requests in anticipation of team call; draft email to document collection team	D.S.	550.00	.50	\$275.00
1/14/2021	class action meeting with John	J.B.	400.00	1.00	\$400.00
1/14/2021	Updating Class Action OAL Decisions Spreadsheet cont.	S.D.	150.00	3.60	\$540.00
1/14/2021	Attention to preliminary review of DOE requests for discovery; TC discussing discovery request and response; firm meeting to assign tasks	L.Q.	500.00	1.40	\$700.00
1/14/2021	Attention to prep for class action meeting/attention to emails re. same/review of defendant's ROGs and RFPs.	S.Q.E.	500.00	1.80	\$900.00
1/14/2021	Attention to legal research re third party discovery (of the OAL).	J.D.R.	690.00	1.50	\$1,035.00
1/14/2021	Further attention to discovery demands; preliminary attention to strategy and planning for responses.	J.D.R.	690.00	2.50	\$1,725.00
1/15/2021	Attention to email Esther Canty-Barnes regarding L.G.'s file.	S.Q.E.	500.00	.10	\$50.00
1/15/2021	E-Mail to Clients re Doodle Poll/Conference Call, Sending Doodle Poll re Availability for Call.	S.D.	150.00	.40	\$60.00



1/15/2021	Further attention to ESI stipulation; call with team re same; preparation and follow-up to same, correspondence with opposing counsel re same.? 2.7	J.D.R.	690.00	2.70	\$1,863.00
1/16/2021	Attention to requirements of billing records for fee application.	J.D.R.	690.00	.50	\$345.00
1/17/2021	exchanged email with John re Rule 26 research	M.P.C.	300.00	.20	\$60.00
1/17/2021	Attention to gathering Plaintiffs? docs responsive to Defendant?s discovery requests.	S.Q.E.	500.00	.50	\$250.00
1/17/2021	Further attention to finalizing ESI stipulation; correspondence with adversary re same.	J.D.R.	690.00	2.50	\$1,725.00
1/18/2021	E-Mail from Paredes re Conference Call/Doodle Poll, Responding to Client, Sending Updated Invitation to Participants.	S.D.	150.00	.10	\$15.00
1/18/2021	Updating Docket Report.	S.D.	150.00	.10	\$15.00
1/18/2021	E-Mail from John re Conference Call, Updating Poll re Appointment Times, E-Mail to Paredes re Appointment Times, Sending Updated Poll Request/E-Mails to Non-Responsive Attendees.	S.D.	150.00	.20	\$30.00
1/18/2021	Attention to E-Mails/Voicemails from Paredes re Class Action Zoom Call, Checking Status of Doodle Poll, Review/Format/Upload Docket Entry re J.A. Thurston Letter to Court, Fwd to John.	S.D.	150.00	.40	\$60.00
1/18/2021	Attention to Defendant's discovery requests.	S.Q.E.	500.00	.60	\$300.00
1/18/2021	Call from Saran re Discovery Demands, Attention to Files re Response to Defendant's Request for Production, Call to Saran re Privileged Correspondence, Attention to Gathering Discovery Production cont.	S.D.	150.00	3.20	\$480.00

1/18/2021	Communications with named plaintiffs re discovery (.5); attention to supplemental 26a disclosures (.5);	J.D.R.	690.00	1.00	\$690.00
1/19/2021	Checking Status re Doodle Poll, E-Mail to John/Don re Poll/Scheduling.	S.D.	150.00	.20	\$30.00
1/19/2021	Attention to gathering docs responsive to Defendant's discovery requests.	S.Q.E.	500.00	.70	\$350.00
1/20/2021	Discovery Meeting cont.	S.D.	150.00	.10	\$15.00
1/20/2021	Downloading/Uploading Zoom Recordings re Discovery Meetings.	S.D.	150.00	.10	\$15.00
1/20/2021	Review/Format/Upload Text Order re J.A. Telephone Conference.	S.D.	150.00	.10	\$15.00
1/20/2021	Scheduling Haile-Selassie Zoom Meeting re Discovery, Sending Invitation to Client.	S.D.	150.00	.20	\$30.00
1/20/2021	Call w John re Meeting Scheduling, Scheduling Paredes Zoom Meeting re Discovery, Sending Invitation to Client, Downloading/Uploading Recording re Second Meeting, Call back from Plaintiff Haile-Selassie re Zoom Meeting.	S.D.	150.00	.30	\$45.00
1/20/2021	Downloading/Uploading Zoom Recordings cont.	S.D.	150.00	.40	\$60.00
1/20/2021	Call to Client re Schedule Meeting,, Scheduling Second Discovery Meeting, Sending Invitations to Attendees, Sending Documents to Attendees of First Meeting, Call to Canty-Barnes re Gilliam Files, Call to Valverde re Canty-Barnes, Call back from Canty-Barnes re Gilliam Files, E-Mails to John/Saran.	S.D.	150.00	.50	\$75.00
1/20/2021	E-Mail from John re Meetings w Clients, Checking Doodle Poll, Calls to Clients re Schedule Meetings, Setting up First Zoom Meeting re Discovery, Calls to Clients re	S.D.	150.00	.70	\$105.00

## Schedule Meeting cont., Setting up Zoom Meeting re First Discovery Meeting.

1/20/2021	Attending First Discovery Meeting.	S.D.	150.00	.90	\$135.00
1/20/2021	Zoom meeting to meet clients	M.P.C.	300.00	.80	\$240.00
1/20/2021	Discovery meeting with group of clients (joined meeting late); follow-up re: same	D.S.	550.00	.80	\$440.00
1/20/2021	Discovery meeting with second group of clients	D.S.	550.00	.80	\$440.00
1/20/2021	class action meeting	J.B.	400.00	1.00	\$400.00
1/20/2021	class action-reviewed class action documents	J.B.	400.00	1.00	\$400.00
1/20/2021	Attention to call with Plaintiffs re. Discovery.	S.Q.E.	500.00	1.60	\$800.00
1/20/2021	Attention to TCs with clients re: discovery request; review of existing client file to identify additional information needed	L.Q.	500.00	2.50	\$1,250.00
1/20/2021	Preliminary meeting re discovery collection with Ms. Osborn, Ms. Gilliam, and Ms. Sweeten (.8); preparation for and follow-up to same (1.6).	J.D.R.	690.00	2.40	\$1,656.00
1/20/2021	Preliminary meeting re discovery collection with Ms. Strunk and Ms. Brown-Crandall (.8); preparation for and follow-up to same (1.6).	J.D.R.	690.00	2.40	\$1,656.00
1/21/2021	Downloading/Uploading Zoom Recordings re Discovery Meetings Three and Four.	S.D.	150.00	.10	\$15.00

1/21/2021	Attention to zoom meetings.	S.Q.E.	500.00	.20	\$100.00
1/21/2021	Discovery meeting with fourth group of clients (joined call late)	D.S.	550.00	.30	\$165.00
1/21/2021	Attendance at client discovery meeting H.S.	S.Q.E.	500.00	.50	\$250.00
1/21/2021	Discovery meeting with third group of clients	D.S.	550.00	.50	\$275.00
1/21/2021	Attention to TC with clients re: discovery request; review draft genral objectives to discovery requests; begin document review and gathering	L.Q.	500.00	3.30	\$1,650.00
1/21/2021	Call with Ms. Paredes (1.0); preparation for and follow-up to same (.5); Call with Mr. Halle-Sellase (1.0); preparation for and follow-up to same (.5); preliminary attention to draft objections and responses (1.5)	J.D.R.	690.00	4.50	\$3,105.00
1/25/2021	Accessing Casefiles from Canty-Barnes cont.	S.D.	150.00	.10	\$15.00
1/25/2021	Review/Format/Upload Gilliam files.	S.D.	150.00	.10	\$15.00
1/25/2021	Attention to Receipt of Gilliam Casefiles from Canty-Barnes, Accessing Files on Box.com, Downloading Class Action Docket Report, Updating Files on Google Drive.	S.D.	150.00	.30	\$45.00
1/25/2021	Review/Format/Upload Gilliam Files cont., E-Mail to Don/Saran/John re Files.	S.D.	150.00	.30	\$45.00
1/25/2021	Review/Format/Upload Gilliam Casefiles cont.	S.D.	150.00	.80	\$120.00

1/25/2021	Email to adversary re ESI stip	J.D.R.	690.00	.20	\$138.00
1/25/2021	Further emails with Ms. Soranno.	J.D.R.	690.00	.20	\$138.00
1/25/2021	Further attention to discovery responses.	J.D.R.	690.00	.30	\$207.00
1/25/2021	Attention to reviewing Def. requests; identifying responses needed; allocating resources	L.Q.	500.00	1.00	\$500.00
1/25/2021	Attention to discovery/doc gathering/client files/specifically pertaining to L.G./H.S./A.S. case files.	S.Q.E.	500.00	2.70	\$1,350.00
1/26/2021	Working on Sharefile Folders re Plaintiffs cont., Sending Links to Lisa.	S.D.	150.00	.10	\$15.00
1/26/2021	Preparing/Sending Links re Plaintiff Sharefile Folders to Lisa cont.	S.D.	150.00	.10	\$15.00
1/26/2021	Attention to E-Mails from Saran/Lisa re Plaintiff Files/Sharefile.	S.D.	150.00	.10	\$15.00
1/26/2021	E-Mail from Lisa re Plaintiffs/Sharefile, Adding Plaintiff Subfolders to Sharefile.	S.D.	150.00	.30	\$45.00
1/26/2021	Attention to E-Mail from Lisa re Discovery Plan, Testing Sharefile Invites re Instructions to Clients, Drafting Instructions to Clients, Sending to Lisa/Crimmel/Burke.	S.D.	150.00	.60	\$90.00
1/26/2021	Attention to Plaintiffs' document selection for response to Defendant's discovery requests.	S.Q.E.	500.00	1.50	\$750.00
1/26/2021	Attention to document review; setting up client files for sharing; correspondence with client	L.Q.	500.00	2.30	\$1,150.00

1/27/2021	Call back to Lisa re Discovery Files.	S.D.	150.00	.10	\$15.00
1/27/2021	Further attention to discovery responses.	J.D.R.	690.00	.30	\$207.00
1/28/2021	E-Mails w Lisa/Burke re E-Mails.	S.D.	150.00	.10	\$15.00
1/28/2021	E-mail from Lisa re Schedule Zoom Call, Scheduling Zoom Call, Attention to John/Lisa E-Mails re Discovery.	S.D.	150.00	.20	\$30.00
1/28/2021	E-Mails w John/Burke re E-Mails, Attention to Burke E-Mail Account on Microsoft Admin Panel, E-Mail to Lisa/John re Microsoft Account.	S.D.	150.00	.20	\$30.00
1/28/2021	Attention to to 1/29/21 discovery meeting.	S.Q.E.	500.00	.20	\$100.00
1/28/2021	Attention to document review for responsive documents; drafting client interrogatory responses and correspondence re: same	L.Q.	500.00	1.50	\$750.00
1/29/2021	read email from Lisa re Rog template	M.P.C.	300.00	.10	\$30.00
1/29/2021	Zoom with Don and Lisa re discovery	M.P.C.	300.00	1.00	\$300.00
1/29/2021	Discovery meeting with L. Quartarolo and M. Crimmel	D.S.	550.00	1.20	\$660.00
1/29/2021	Attention to internal strategy session for responses for all clients; completion of interrogatory responses for M.S.; correspondence with client re: same	L.Q.	500.00	2.70	\$1,350.00
1/31/2021	Osborn-familiarize with client and prepare Rog's	M.P.C.	300.00	3.50	\$1,050.00

2/1/2021	E-Mail from Lisa, Scheduling Strunk Zoom Call.	S.D.	150.00	.10	\$15.00
2/1/2021	E-Mail from Lisa re Strunk Zoom Meeting, Setting up Zoom Meeting.	S.D.	150.00	.10	\$15.00
2/1/2021	E-Mail from Crimmel re Plaintiffs' Contact Information, Gathering Client Contract Information, E-Mail to Crimmel.	S.D.	150.00	.20	\$30.00
2/1/2021	Call with Johanna to discuss Rog's	M.P.C.	300.00	.50	\$150.00
2/1/2021	Meeting with S. Quartarolo to discuss responses to individual interrogatories	D.S.	550.00	.30	\$165.00
2/1/2021	class action discovery-meeting with Matt	J.B.	400.00	.50	\$200.00
2/1/2021	Attention to client calls re. defendant's discovery requests.	S.Q.E.	500.00	.50	\$250.00
2/1/2021	Attention to completion of MS responses; meeting with client to review same; continued review of documentation for responsiveness	L.Q.	500.00	2.30	\$1,150.00
2/2/2021	E-Mail from Lisa re Strunk Zoom Meeting, Scheduling Zoom Meeting.	S.D.	150.00	.10	\$15.00
2/2/2021	email to client Haile-Selassie re Rog's	M.P.C.	300.00	.10	\$30.00
2/2/2021	Updating Docket Report, Checking Status re Google Drive Documents.	S.D.	150.00	.30	\$45.00
2/2/2021	class action discovery-meeting with Brown to review rogs	J.B.	400.00	.50	\$200.00

2/2/2021	class action discovery-meeting with Paredes to discuss rogs	J.B.	400.00	.50	\$200.00
2/2/2021	Attention to further meeting with client to review interrogatory and document reponse;	L.Q.	500.00	2.70	\$1,350.00
2/3/2021	E-Mail from Lisa re Correspondence Files for Discovery, Granting Self Access to John/Krista/Don Inboxes re Adjournments/Settlement.	S.D.	150.00	.20	\$30.00
2/3/2021	Searching Attorney Inboxes re Adjournment/Settlement Letters re Discovery cont.	S.D.	150.00	.30	\$45.00
2/3/2021	Respond to email with advice re: responses to interrogatories	D.S.	550.00	.10	\$55.00
2/3/2021	Gaining Access to John/Don/Krista Inboxes re Adjournment/Settlement Communications for Discovery cont.	S.D.	150.00	.40	\$60.00
2/3/2021	E-Mail from Crimmel re Plaintiffs' Records of Appeal for Discovery, Attention to Files, Sending Files to Crimmel.	S.D.	150.00	.60	\$90.00
2/3/2021	Attention to client meetings re. Defendant?s discovery requests.	S.Q.E.	500.00	.30	\$150.00
2/3/2021	Familiarize with client, prepare Rog's-Sweenton	M.P.C.	300.00	1.00	\$300.00
2/3/2021	class action discovery-worked on Brown's answers to rogs	J.B.	400.00	1.50	\$600.00
2/3/2021	class action discovery-worked on Paredes answers to rogs	J.B.	400.00	4.00	\$1,600.00
2/3/2021	Attention to review of YHS case file; draft interrogatory responses; document review; status update of responses from other plaintiffs	L.Q.	500.00	4.70	\$2,350.00



2/4/2021	Provide updates interrogatory template for completion of responses	D.S.	550.00	.10	\$55.00
2/4/2021	Provide recommendation for revisions to global interrogatory responses	D.S.	550.00	.20	\$110.00
2/4/2021	Attention to discovery matters/status of responses.	S.Q.E.	500.00	.40	\$200.00
2/4/2021	Attention to ESI protocol.	J.D.R.	690.00	.30	\$207.00
2/4/2021	Prepare Sweenton Rog's	M.P.C.	300.00	4.00	\$1,200.00
2/4/2021	Attention to completion of plaintiff response to rogs and documents review; team TC re: ESI	L.Q.	500.00	4.00	\$2,000.00
2/5/2021	Searching Attorney Inboxes for Correspondence Responsive to Discovery Demands.	S.D.	150.00	.10	\$15.00
2/5/2021	Searching Attorney Inboxes re Correspondence cont.	S.D.	150.00	.20	\$30.00
2/5/2021	Working on Retrieval of Correspondence cont., E-Mail to Lisa re Document Retrieval.	S.D.	150.00	.20	\$30.00
2/5/2021	corresponded with Lisa re Osborn Rog's- 5 emails	M.P.C.	300.00	.30	\$90.00
2/5/2021	Attention to emails/scheduling client meeting.	S.Q.E.	500.00	.40	\$200.00
2/5/2021	class action discovery-meeting with Gilliam to review rogs	J.B.	400.00	.50	\$200.00

2/5/2021	Team call to discuss ESI Protocol	D.S.	550.00	.50	\$275.00
2/5/2021	Prepare Osborn Rog's	M.P.C.	300.00	1.00	\$300.00
2/5/2021	Prepare for and participate in team call re: discovery	D.S.	550.00	.80	\$440.00
2/5/2021	Prepare Osborn Rog's	M.P.C.	300.00	4.30	\$1,290.00
2/6/2021	Osborn-Production of documents	M.P.C.	300.00	2.00	\$600.00
2/6/2021	class action discovery-worked on Gilliam's answers to rogs	J.B.	400.00	1.50	\$600.00
2/7/2021	Osborn Document production	M.P.C.	300.00	1.00	\$300.00
2/8/2021	Downloading Docket Report.	S.D.	150.00	.10	\$15.00
2/8/2021	Call from Saran re Gilliam Files/Canty-Barnes Contact Information.	S.D.	150.00	.10	\$15.00
2/8/2021	E-Mail from Crimmel re Client Documents, Attention to Files, E-Mail to Crimmel re Client Files.	S.D.	150.00	.20	\$30.00
2/8/2021	Searching E-Mail for Documents Responsive to Discovery Demands cont.	S.D.	150.00	.20	\$30.00
2/8/2021	corresponded with Sean re locating discovery for Osborn over 2 emails	M.P.C.	300.00	.20	\$60.00

2/8/2021	Searching Attorney E-Mails cont.	S.D.	150.00	.50	\$75.00
2/8/2021	Review Rog's response template from Lisa's email	M.P.C.	300.00	.30	\$90.00
2/8/2021	Attention to obtaining L.G. related emails.	S.Q.E.	500.00	.20	\$100.00
2/8/2021	Draft internal email re: completing Haile-Selassi discovery responses	D.S.	550.00	.20	\$110.00
2/8/2021	Searching John's E-Mail re Strunk Correspondence for Discovery.	S.D.	150.00	.80	\$120.00
2/8/2021	Class action discovery meeting with Lisa and Don	J.B.	400.00	.50	\$200.00
2/8/2021	Status check-in with discovery team	D.S.	550.00	.50	\$275.00
2/8/2021	Osborn-Document Production	M.P.C.	300.00	1.00	\$300.00
2/8/2021	Sweeton Document production	M.P.C.	300.00	1.50	\$450.00
2/8/2021	Attention to response to document production	D.S.	550.00	1.30	\$715.00
2/8/2021	class action discovery-worked on Gilliam answers to rogs	J.B.	400.00	2.00	\$800.00
2/8/2021	Attention to completion of MS responses; TC with client re: same; monitor staff working on client responses;	L.Q.	500.00	2.30	\$1,150.00

2/8/2021	Class action discovery-worked on Paredes answers to rogs	J.B.	400.00	3.00	\$1,200.00
2/8/2021	Attention to discovery responses; discovery strategy.	J.D.R.	690.00	2.10	\$1,449.00
2/8/2021	class action discovery-uploaded production of documents-Paredes, Brown & Gilliam	J.B.	400.00	3.00	\$1,200.00
2/8/2021	class action discovery-worked on Brown's answers to rogs	J.B.	400.00	3.00	\$1,200.00
2/9/2021	E-Mails w Crimmel re Adding Headers to Confidential Discovery Documents.	S.D.	150.00	.20	\$30.00
2/9/2021	Call from Don re Pending Assignments/Discovery.	S.D.	150.00	.30	\$45.00
2/9/2021	Emails to Don re preparing Rog's for uploading to state -3	M.P.C.	300.00	.20	\$60.00
2/9/2021	class action discovery-Paredes	J.B.	400.00	.50	\$200.00
2/9/2021	class action discovery-revised Paredes rogs	J.B.	400.00	.50	\$200.00
2/9/2021	class action discovery-discussed rogs with Brown	J.B.	400.00	.50	\$200.00
2/9/2021	Review/respond to email re: contents of document production for M.S. matter	D.S.	550.00	.50	\$275.00
2/9/2021	class action discovery-production of documents for Gilliam	J.B.	400.00	1.00	\$400.00

2/9/2021	class action discovery-revised Paredes rogs	J.B.	400.00	1.00	\$400.00
2/9/2021	class action discovery-production of documents for Gilliam	J.B.	400.00	1.50	\$600.00
2/9/2021	Preliminary attention to YHS rogs responses.	J.D.R.	690.00	1.20	\$828.00
2/9/2021	class action discovery-production of documents for Brown	J.B.	400.00	2.00	\$800.00
2/9/2021	Attention to discovery production; confidentiality issues.	J.D.R.	690.00	3.30	\$2,277.00
2/9/2021	Attention to identification of MS confidential documents; production of atty emails; review and revision of C.P. responses	L.Q.	500.00	5.50	\$2,750.00
2/9/2021	Work on document production	D.S.	550.00	6.90	\$3,795.00
2/10/2021	Pulling Attorney Correspondence Responsive to Discovery Demands cont.	S.D.	150.00	.10	\$15.00
2/10/2021	Adding Confidentiality Header to Documents cont., E-Mail to Don/Lisa, E-Mails w Crimmel re Files Issues.	S.D.	150.00	.60	\$90.00
2/10/2021	E-Mails w Don/Burke re Confidentiality Header, Adding Header to Documents.	S.D.	150.00	.80	\$120.00
2/10/2021	class action discovery-revised Brown's rogs	J.B.	400.00	.50	\$200.00
2/10/2021	class action discovery-revised Gilliam's rogs	J.B.	400.00	.50	\$200.00

2/10/2021	class action discovery-revising rogs	J.B.	400.00	.50	\$200.00
2/10/2021	class action discovery-revised Brown rogs	J.B.	400.00	1.00	\$400.00
2/10/2021	Sweeton Osborn Rog's and Document production	M.P.C.	300.00	2.00	\$600.00
2/10/2021	Prepare for team meeting re: meet & confer; team meeting to prepare for meet and confer	D.S.	550.00	1.30	\$715.00
2/10/2021	Attention to document production and discovery responses; management of team to move discovery forward	D.S.	550.00	1.60	\$880.00
2/10/2021	Work on client discovery responses, including review of client document collections	D.S.	550.00	1.80	\$990.00
2/10/2021	class action discovery-revised Gilliam, Brown and Paredes rogs	J.B.	400.00	2.00	\$800.00
2/10/2021	Further attention to rog responses and RFPs.	J.D.R.	690.00	2.50	\$1,725.00
2/10/2021	Work on client discovery responses, including review of client document collections	D.S.	550.00	3.20	\$1,760.00
2/10/2021	Attention to review and revisions to all client responses; signature pages and completion of responses to submission 2/11	L.Q.	500.00	5.50	\$2,750.00
2/11/2021	E-Mail from Lisa re Sweeten Certification Signature, Formatting into PDF, Sending to Lisa.	S.D.	150.00	.20	\$30.00
2/11/2021	E-Mail from Lisa re Issues w Haile-Selassie Files, Attention to Files, Sending Requested Files to Lisa.	S.D.	150.00	.30	\$45.00

2/11/2021	Pulling Attorney Correspondence Responsive to Discovery Demands cont.	S.D.	150.00	.30	\$45.00
2/11/2021	communicated via email (5) with Lisa re Sweeton signature of Rog's	M.P.C.	300.00	.20	\$60.00
2/11/2021	Pulling Attorney Correspondence Responsive to Discovery Demands cont., Reviewing/Culling Redundant Strunk E-Mails.	S.D.	150.00	.40	\$60.00
2/11/2021	Corresponded through 3 emails and 1 phone call with Adele Sweeton	M.P.C.	300.00	.30	\$90.00
2/11/2021	E-Mails w Lisa re Discovery Documents Search, Searching for Attorney E-Mails Responsive to Discovery Demands cont.	S.D.	150.00	.70	\$105.00
2/11/2021	Reviewing/Culling Redundant Strunk Correspondence Responsive to Discovery cont., E-Mail to Don/Lisa re Scope of Discovery, Reviewing/Culling Documents cont, E-Mails w Lisa re Scope of Discovery.	S.D.	150.00	.80	\$120.00
2/11/2021	class action discovery-meeting with Lisa	J.B.	400.00	.30	\$120.00
2/11/2021	Prepare for meet & confer call	D.S.	550.00	.40	\$220.00
2/11/2021	Work on production folders	D.S.	550.00	.80	\$440.00
2/11/2021	Attention to submission of interrogatory and RFP responses	L.Q.	500.00	1.80	\$900.00
2/11/2021	Meet & Confer with adversaries and T. O'Leary and H. Ruiz (Walsh Pizzi) re: 30(b)(6) deposition notice, ESI Stip, and (briefly) interrogatory responses	D.S.	550.00	2.00	\$1,100.00

2/11/2021	Assist with finalizing discovery responses	D.S.	550.00	3.60	\$1,980.00
2/12/2021	read email from Lisa re providing complete Rog's to clients	M.P.C.	300.00	.10	\$30.00
2/12/2021	class action discovery-meeting with Lisa	J.B.	400.00	.30	\$120.00
2/12/2021	Conference with L. Quartarolo re: deposition preparation and additional document collection	D.S.	550.00	.70	\$385.00
2/12/2021	Team call as follow-up to 2/11 call, including discussion of discovery strategy and settlement strategy (joined call late); follow-up re: same	D.S.	550.00	.70	\$385.00
2/12/2021	Attention to YHS response revisions; debrief with staff; status of atty email review; initial review of DOE responses to discovery	L.Q.	500.00	3.20	\$1,600.00
2/12/2021	Attention to YHS discovery responses; team meeting; discovery strategy; settlement strategy; communication with Kerry Soranno.	J.D.R.	690.00	4.30	\$2,967.00
2/15/2021	Downloading Docket Report, Checking Status of Google Drive Documents.	S.D.	150.00	.10	\$15.00
2/15/2021	PDFing/Formatting Correspondence re Strunk Responsive to Discovery Demands, Uploading, E-Mail to Lisa.	S.D.	150.00	1.50	\$225.00
2/15/2021	Attention to review of attorney correspondence; initial review of NJDOE RFPD and rog reponses to Pl. discovery request	L.Q.	500.00	2.80	\$1,400.00
2/16/2021	E-Mail from Don re Haile-Selassie Signature Page for Class Action Certification, Attention to Correspondence re Search for Signature Page, E-Mail to Don.	S.D.	150.00	.10	\$15.00
2/16/2021	Attention to review of atty correspondence; completion of Plaintiff YHS rog responses; questions re: documents previously received from NJDOE related to 45-day tracking;	L.Q.	500.00	2.50	\$1,250.00



Preparation for plaintiff ESI collection and transfer					
2/17/2021	E-Mail from Don re Discovery Documents, Uploading Documents to Sharefile, Checking John's In-Box re Haile-Selassie Certification.	S.D.	150.00	.20	\$30.00
2/17/2021	Attention to service of Def./emails re. same	S.Q.E.	500.00	.50	\$250.00
2/17/2021	Attention to TC with ESI expert at Walsh; discussion with DAS re: ESI requirements and timing for JRA plaintiffs; creation of ESI planner to guide team; review of RFPD after identifying additional responsive documents	L.Q.	500.00	3.50	\$1,750.00
2/18/2021	Attention to email re. ESI discovery.	S.Q.E.	500.00	.10	\$50.00
2/18/2021	Attention to E-Mail/Spreadsheet from Lisa re Continuation of Class Action Discovery Production, Working on Retrieving Attorney Correspondence Responsive to Discovery Demands.	S.D.	150.00	1.40	\$210.00
2/18/2021	Attention to informing team of ESI requirements for client communications with LEA; complete review of NJDOE discovery response;	L.Q.	500.00	2.80	\$1,400.00
2/19/2021	E-Mail from John re Walsh Law Box.com Invitation, Signing up for Account, E-Mail to John re Confirmation E-Mail.	S.D.	150.00	.10	\$15.00
2/19/2021	Document Search re Attorney Correspondence Responsive to Discovery Demands cont.	S.D.	150.00	.30	\$45.00
2/19/2021	E-Mails w Don/Lisa/Krista re Discovery Responses, Retrieving E-Mails from Krista Account cont.	S.D.	150.00	.30	\$45.00
2/19/2021	E-Mails w Krista re John Inbox Issues re Discovery, Searching for Attorney Correspondence cont.	S.D.	150.00	1.00	\$150.00

2/19/2021	class action discovery-email communications	J.B.	400.00	.50	\$200.00
2/19/2021	E-Mail from John re Box.com Confirmation E-Mail, Downloading Defendant's Document Production, Uploading to Discovery Folder on Sharepoint.	S.D.	150.00	1.60	\$240.00
2/19/2021	Attention to discovery issues	K.H.	550.00	.70	\$385.00
2/19/2021	Attention to correspondence with counsel, team and clients re: ESI requirements; complete review of attorney correspondence; identify and locate documents for supplemental RFPD	L.Q.	500.00	3.80	\$1,900.00
2/21/2021	reaching out to clients for ESI-Haile-Selassie	M.P.C.	300.00	.10	\$30.00
2/22/2021	E-Mail from Crimmel re Second Round of Discovery, Looking into Crimmel Questions re Discovery.	S.D.	150.00	.20	\$30.00
2/22/2021	Looking into Crimmel Questions re Discovery cont., E-Mail to Crimmel.	S.D.	150.00	.20	\$30.00
2/23/2021	E-Mail from Don re Attorney Correspondence, Review/Format/Upload Letter to Sorano re Deposition.	S.D.	150.00	.10	\$15.00
2/23/2021	Downloading Docket Report, Checking Status of Google Drive Documents.	S.D.	150.00	.10	\$15.00
2/23/2021	Review deposition notice; emails with co-counsel re: same	D.S.	550.00	.10	\$55.00
2/23/2021	Review email attaching Deposition Notice; brief research re: Federal Rule 30; draft email to co-counsel re: video recording	D.S.	550.00	.30	\$165.00
2/24/2021	Attention to E-Mail from Lisa re Discovery, Locating/Recovering E-Mail Attachments from Outlook.	S.D.	150.00	.40	\$60.00

2/24/2021	Gathering Discovery Response Documents cont., Sending to Lisa.	S.D.	150.00	.40	\$60.00
2/25/2021	Gathering Attorney E-Mails re Discovery cont.	S.D.	150.00	2.00	\$300.00
2/25/2021	Gathering Attorney Correspondence cont., E- Mail from Don re Defendant Discovery Production, Download/Review/Format/Upload Produced Documents, Gathering Attorney Correspondence cont.	S.D.	150.00	3.30	\$495.00
2/25/2021	ESI search for Osborn	M.P.C.	300.00	2.00	\$600.00
2/26/2021	Attention to E-Mail from Crimmel re Files, E- Mail to Crimmel re Files Relocation Instructions.	S.D.	150.00	.10	\$15.00
2/26/2021	Searching for Attorney E-Mails re Discovery cont.	S.D.	150.00	.40	\$60.00
2/26/2021	Searching for Attorney E-Mails re Discovery cont.	S.D.	150.00	.90	\$135.00
2/27/2021	class action discovery-reviewed emails for Brown and Paredes	J.B.	400.00	1.00	\$400.00
2/28/2021	ESI search for Osborn	M.P.C.	300.00	2.50	\$750.00
3/1/2021	Downloading Docket Report, Checking Status of Google Drive Documents.	S.D.	150.00	.10	\$15.00
3/2/2021	Attention to ALR on inter/intra-agency memoranda	D.S.	550.00	.20	\$110.00

3/3/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.10	\$15.00
3/3/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.10	\$15.00
3/3/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.10	\$15.00
3/4/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.30	\$45.00
3/4/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.50	\$75.00
3/4/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.70	\$105.00
3/4/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	2.10	\$315.00
3/4/2021	Review/analyze draft letter to Judge Williams; propose changes to same	D.S.	550.00	1.70	\$935.00
3/4/2021	Prepare for meet-and-confer call with adversary; call with adversary; follow-up re: same	D.S.	550.00	1.80	\$990.00
3/5/2021	Attention to docket notice/review of same.	S.Q.E.	500.00	.20	\$100.00
3/5/2021	Review/respond to team emails re: letter to Judge Williams	D.S.	550.00	.20	\$110.00
3/6/2021	EDI search for Hallie-Selassie	M.P.C.	300.00	1.30	\$390.00

3/7/2021	search for Osborn attorney to attorney communications	M.P.C.	300.00	1.00	\$300.00
3/8/2021	E-Mail from Don re Discovery Documents, Downloading Files from O'Leary.	S.D.	150.00	.10	\$15.00
3/8/2021	Downloading Docket Report.	S.D.	150.00	.10	\$15.00
3/8/2021	Emails re: ESI discovery	D.S.	550.00	.10	\$55.00
3/8/2021	Confer with L. Quartarolo re: open discovery issues	D.S.	550.00	.20	\$110.00
3/8/2021	Draft email to client re: potential for deposition	D.S.	550.00	.40	\$220.00
3/8/2021	Search Osborn for attorney to attorney communications	M.P.C.	300.00	1.50	\$450.00
3/8/2021	Attention to updated information for clients; correspondence from co-counsel; preparation for ESI transfer from client and firm; drafting review points for client deposition preparation	L.Q.	500.00	2.40	\$1,200.00
3/9/2021	Review/Format/Upload Docket Entry re O'Leary Letter.	S.D.	150.00	.10	\$15.00
3/9/2021	Review/Format/Upload Docket Entry/Text Order re Soranno Letter/Telephone Status Conference, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
3/9/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.20	\$30.00
3/9/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.20	\$30.00

3/9/2021	communicated over 3 emails with Lisa re client's email address confirmation	M.P.C.	300.00	.20	\$60.00
3/9/2021	Review email traffic and respond to same re: Discovery Call with Court	D.S.	550.00	.20	\$110.00
3/9/2021	Attend to calendar issues related to deposition of Catherine Anthony; emails re: scheduling and attendance at call with Judge Williams	D.S.	550.00	.20	\$110.00
3/9/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	.90	\$135.00
3/9/2021	Attention to ESI data transfer from clients and firm; prepare client timeline (Strunk) for deposition preparation	L.Q.	500.00	1.50	\$750.00
3/10/2021	E-Mails w Crimmel/Lisa re Discovery Documents.	S.D.	150.00	.10	\$15.00
3/10/2021	Set up technology to attend deposition of Catherine Anthony	D.S.	550.00	.20	\$110.00
3/10/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	1.90	\$285.00
3/10/2021	Gathering Attorney Correspondence re Discovery cont., Attention to E-Mail from Lisa re Strunk Files, Downloading Client Files from Sharefile, Gathering Attorney Correspondence cont.	S.D.	150.00	1.90	\$285.00
3/10/2021	Attention to internal ESI collection and add'l client documents; correspondence with client re: transfer of existing documents	L.Q.	500.00	.70	\$350.00
3/10/2021	class action discovery-worked on Paredes timeline for deposition	J.B.	400.00	2.00	\$800.00

3/10/2021	class action discovery-worked on Brown timeline for deposition	J.B.	400.00	2.00	\$800.00
3/10/2021	Monitor deposition of Catherine Anthony; team meeting during lunch break;	D.S.	550.00	4.60	\$2,530.00
3/11/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	.20	\$30.00
3/11/2021	Gathering Attorney Correspondence cont., Attention to Lisa E-Mail re Discovery Status.	S.D.	150.00	.20	\$30.00
3/11/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	.20	\$30.00
3/11/2021	Gathering Attorney Correspondence re Discovery cont., E-Mails w Lisa re Files, Gathering Correspondence cont.	S.D.	150.00	.50	\$75.00
3/11/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	.60	\$90.00
3/11/2021	Confer with L. Quartarolo re: client email productions; provide direction re: same	D.S.	550.00	.30	\$165.00
3/11/2021	Attnetion to status from counsel for each client; JRA attorney correspodnence update; sharefile received from MS; correspondence with co-counsel firm;	L.Q.	500.00	1.50	\$750.00
3/11/2021	Gathering Attorney Correspondence re Discovery cont., E-Mails w Lisa re Files cont., Gathering Correspondence cont.	S.D.	150.00	4.80	\$720.00
3/11/2021	class action discovery-worked on Gilliam timeline for deposition	J.B.	400.00	2.00	\$800.00
3/12/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	.20	\$30.00

3/12/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	.30	\$45.00
3/12/2021	Corresponded with Lisa for 3 emails re conversations with Sweeton	M.P.C.	300.00	.20	\$60.00
3/12/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	1.00	\$150.00
3/12/2021	Gathering Attorney Correspondence cont.	S.D.	150.00	1.70	\$255.00
3/12/2021	Attention to status call with Court and team debrief	L.Q.	500.00	1.50	\$750.00
3/12/2021	Prepare for call with court; call with Magistrate Judge Williams; follow-up call with team	D.S.	550.00	1.70	\$935.00
3/15/2021	Downloading Docket Report.	S.D.	150.00	.10	\$15.00
3/15/2021	Attention to status of client collection of documents (ESI)	L.Q.	500.00	.20	\$100.00
3/16/2021	Gathering Attorney Correspondence cont., E-Mails w Lisa re Status of Discovery Response.	S.D.	150.00	.10	\$15.00
3/16/2021	E-Mail from Hogan re Schedule Discovery Video Conference, Checking Calendar re Schedule Zoom Meeting, Call to Krista/John re Availability, E-Mails w Hogan re Scheduling, Scheduling Zoom Meeting, Updating Calendar.	S.D.	150.00	.30	\$45.00
3/16/2021	Zoom Meeting re Discovery.	S.D.	150.00	.50	\$75.00



3/16/2021	Gathering Attorney Correspondence re Discovery cont., Contacting Microsoft Support re Lost E-Mail Accounts, Gathering Attorney Correspondence cont.	S.D.	150.00	1.00	\$150.00
3/16/2021	JRA Team Meeting re: client discovery; follow-on meeting with T. O'Leary re: same and re: depositions	D.S.	550.00	1.00	\$550.00
3/16/2021	Attention to ESI data collection status and next actions; review of list of OAL decisions received from co-counsel	L.Q.	500.00	1.20	\$600.00
3/16/2021	Further attention to document collection; preliminary research on deliberative process privilege.	J.D.R.	690.00	1.40	\$966.00
3/16/2021	Attention to discovery logistics and planning, esp. collection of ESI.	J.D.R.	690.00	1.50	\$1,035.00
3/17/2021	Review/Format/Upload Text Order re Deliberative Process Briefs, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
3/17/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.30	\$45.00
3/17/2021	Attention to updating ESI planner; identification of gaps; correspondence with co-counsel firm;	L.Q.	500.00	.50	\$250.00
3/18/2021	E-Mails re Scheduling Discovery Meeting.	S.D.	150.00	.10	\$15.00
3/18/2021	Review/Format/Upload Docket Notice re Minute Entry.	S.D.	150.00	.10	\$15.00
3/18/2021	E-Mails w Of-Counsel re Casefox/Time Tracking.	S.D.	150.00	.10	\$15.00
3/18/2021	Reviewing ESI Spreadsheet from Lisa, E-Mail from John re Reschedule Meeting, E-Mails re Rescheduling, Rescheduling Discovery Meeting.	S.D.	150.00	.20	\$30.00

3/18/2021	Attention to updating ESI planner re: internal and client documents collection; preparation for TC re: same on 3/19	L.Q.	500.00	.50	\$250.00
3/19/2021	Attention to E-mail re Brown-Crandol Deposition Notice, Updating Calendar/Case Tracking.	S.D.	150.00	.10	\$15.00
3/19/2021	Zoom Meeting re Discovery.	S.D.	150.00	.50	\$75.00
3/19/2021	Review/respond to email re: coverage for Shay Brown's deposition and strategy for handling plaintiff depositions; internal email re: same	D.S.	550.00	.30	\$165.00
3/19/2021	Zoom conference with JRA team re: client discovery	D.S.	550.00	.40	\$220.00
3/19/2021	class action discovery-worked on Gilliam's timeline for deposition	J.B.	400.00	.50	\$200.00
3/19/2021	class action discovery-prepared Gilliam's timeline for deposition	J.B.	400.00	.50	\$200.00
3/19/2021	prepares Lateefah Gilliam's deposition timeline	J.B.	400.00	.50	\$200.00
3/19/2021	prepared Lateefah Gilliam's deposition timeline	J.B.	400.00	.50	\$200.00
3/19/2021	Attention to TC re: ESI; confirmation of client email services; follow-up actions	L.Q.	500.00	.70	\$350.00
3/19/2021	Further attention to collection of relevant documents.	J.D.R.	690.00	1.20	\$828.00
3/21/2021	corresponded with client Osborn re ESI	M.P.C.	300.00	.20	\$60.00

3/21/2021	corresponding with Sean re shared files location	M.P.C.	300.00	.20	\$60.00
3/22/2021	Downloading Docket Sheet, Updating Google Drive re New Docket Entries.	S.D.	150.00	.20	\$30.00
3/22/2021	Working on Downloading State Supplemental Production, E-Mail to John re Dropbox Access, Downloading Files cont.	S.D.	150.00	.40	\$60.00
3/22/2021	class action discovery-meeting with John	J.B.	400.00	.50	\$200.00
3/22/2021	Meeting with John-discovery	J.B.	400.00	.50	\$200.00
3/22/2021	Attention NJDOE discovery response; ESI update; discussion re: ALJ training	L.Q.	500.00	1.00	\$500.00
3/23/2021	E-Mails w Burke re Client Files/Billing.	S.D.	150.00	.10	\$15.00
3/23/2021	E-Mail from John re State Supplemental Production, Attention to Files, E-Mail to John.	S.D.	150.00	.10	\$15.00
3/23/2021	Review/Format/Upload Docket Entry re J.A. Matter Discovery, Fwd to John.	S.D.	150.00	.10	\$15.00
3/23/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.10	\$15.00
3/23/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.30	\$45.00
3/23/2021	class action discovery-worked on Paredes timeline for deposition	J.B.	400.00	.50	\$200.00

3/23/2021	drafted Cecilia Paredes deposition timeline	J.B.	400.00	.50	\$200.00
3/23/2021	class action discovery-drafted deposition questions for Brown	J.B.	400.00	1.00	\$400.00
3/23/2021	Shaye Brown drafted list of deposition questions	J.B.	400.00	3.00	\$1,200.00
3/24/2021	Setting up E-Mail Account re Class Action Discovery, Transferring John's Inbox.	S.D.	150.00	.10	\$15.00
3/24/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.20	\$30.00
3/24/2021	Review/Format/Upload Transcript re Anthony Deposition, Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	1.00	\$150.00
3/24/2021	Gathering Attorney Correspondence for Discovery cont., E-Mail to Lisa re Status.	S.D.	150.00	1.60	\$240.00
3/24/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	1.80	\$270.00
3/24/2021	search ESI for Osborn attorney to attorney	M.P.C.	300.00	1.00	\$300.00
3/24/2021	Attention to firm email collection; ESI transfer; transcript of C. Anthony deposition	L.Q.	500.00	1.20	\$600.00
3/25/2021	Attention to John/Lisa E-Mails re Discovery.	S.D.	150.00	.10	\$15.00
3/25/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.10	\$15.00

3/25/2021	E-mails w Burke re Outlook Calendar Access re Set up Plaintiff Calls.	S.D.	150.00	.10	\$15.00
3/25/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.10	\$15.00
3/25/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.10	\$15.00
3/25/2021	email to John re client email addresses	M.P.C.	300.00	.10	\$30.00
3/25/2021	Gathering Attorney Correspondence re Discovery cont.	S.D.	150.00	.20	\$30.00
3/25/2021	E-Mail from John re J.A. Docket Entry re Motion to Consolidate, Review/Format/Upload Docket Entries/Notice, E-Mail to John re J.A. Motion to Consolidate.	S.D.	150.00	.30	\$45.00
3/25/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.30	\$45.00
3/25/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.40	\$60.00
3/25/2021	Attention to discovery demand for sample OAL matters from 2010-2012; review of sample matters in Westlaw	L.Q.	500.00	1.70	\$850.00
3/25/2021	class action discovery-drafted deposition questions for Brown	J.B.	400.00	2.00	\$800.00
3/26/2021	Meeting with John and Shaye Brown	J.B.	400.00	.80	\$320.00
3/26/2021	class action discovery-meeting with Brown deposition prep	J.B.	400.00	.80	\$320.00

3/26/2021	Attention to preparation for plaintiff depositions	L.Q.	500.00	.90	\$450.00
3/26/2021	Attention to letter to DAG re discovery deficiencies.	J.D.R.	690.00	.80	\$552.00
3/26/2021	Attention to draft brief in support of motion to compel.	J.D.R.	690.00	1.50	\$1,035.00
3/27/2021	search for Osborn attorney to attorney communication	M.P.C.	300.00	1.00	\$300.00
3/28/2021	search ESI attorney to attorney for Sweeton	M.P.C.	300.00	1.30	\$390.00
3/29/2021	search ESI for Sweeton attorney to attorney	M.P.C.	300.00	1.00	\$300.00
3/29/2021	Attention to preparation for plaintiff depositions - review and revision of one client matter timeline; identify key points in 2nd amended complaint and proposed guidelines to review with clients and prepare for depositions	L.Q.	500.00	1.00	\$500.00
3/30/2021	email to Lisa re ESI	M.P.C.	300.00	.10	\$30.00
3/30/2021	E-Mails w Lisa re Attorney E-Mails for Discovery, Downloading Docket Report.	S.D.	150.00	.30	\$45.00
3/30/2021	corresponded with Lisa over 3 emails re status update of clients	M.P.C.	300.00	.20	\$60.00
3/30/2021	Develop Osborn litigation timeline for deposition	M.P.C.	300.00	1.30	\$390.00

3/30/2021	Attention to review of attorney emails for confidential information; client preparation for depositions; status update on ESI transfer for clients	L.Q.	500.00	1.50	\$750.00
3/31/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	1.00	\$150.00
3/31/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	1.10	\$165.00
3/31/2021	Continued review of attorney emails	L.Q.	500.00	.50	\$250.00
4/1/2021	E-Mails w Crimmel re Plaintiff Files for Discovery, Attention to Files re OAL Records, Gathering Attorney Correspondence for Discovery cont., E-Mail to Don/Lisa re Discovery Status.	S.D.	150.00	.80	\$120.00
4/1/2021	Developed Osborn litigation timeline	M.P.C.	300.00	1.50	\$450.00
4/2/2021	Review/Format/Upload Docket Entries re Attorney General Letters, Fwd to John.	S.D.	150.00	.20	\$30.00
4/2/2021	reviewed Shaye Brown's emails	J.B.	400.00	1.00	\$400.00
4/5/2021	E-Mails re Discovery w John/Hogan.	S.D.	150.00	.10	\$15.00
4/5/2021	E-Mail to Burke re Brown-Crandol Files/Schedule Zoom Call.	S.D.	150.00	.10	\$15.00
4/5/2021	Review/respond to email from client re: deposition preparation	D.S.	550.00	.10	\$55.00

4/5/2021	Call w Hogan re Discovery Status/Client E-Mails, Downloading/Accessing Brown-Crandol .pst Files.	S.D.	150.00	.70	\$105.00
4/5/2021	Phone call with J. Rue and T. O'Leary re: continuing discovery of client emails, etc.; follow-up re: same	D.S.	550.00	.40	\$220.00
4/5/2021	Attention to deposition preparation; review complaint and client timelines	L.Q.	500.00	1.30	\$650.00
4/6/2021	E-Mails w Burke re Client .pst Files.	S.D.	150.00	.10	\$15.00
4/6/2021	Call from O'Leary, Fwd to Don.	S.D.	150.00	.10	\$15.00
4/6/2021	Zoom Call w Burke re Client .pst Files.	S.D.	150.00	.10	\$15.00
4/6/2021	Zoom Call re Client Documents cont.	S.D.	150.00	.10	\$15.00
4/6/2021	Review/Format/Upload Docket Entries re J.A. Letters from Branderbit/Donio, Fwd to John.	S.D.	150.00	.20	\$30.00
4/6/2021	Zoom Meeting re .pst Files cont., E-Mail to Don re Tech Assistance/File Retrieval.	S.D.	150.00	.30	\$45.00
4/6/2021	Review/Format/Upload Text Order Scheduling Status Teleconference, Updating Calendar/Case Tracking, Downloading Docket Report, Updating Documents on Google Drive, Accessing Don's Outlook Account re Attorney Correspondence for Discovery.	S.D.	150.00	.30	\$45.00
4/6/2021	Emails re: case list as a follow-up to status call	D.S.	550.00	.20	\$110.00



4/6/2021	Attention to pushback from state re: discovery request for due process petitions;ESI status from clients; preparation for deposition 4/9/21	L.Q.	500.00	.80	\$400.00
4/6/2021	Appear for status call with the Court; follow-up call with T. O'Leary	D.S.	550.00	1.00	\$550.00
4/7/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.10	\$15.00
4/7/2021	Review/respond to email from co-counsel re: potential 30(b)(6) deposition	D.S.	550.00	.10	\$55.00
4/7/2021	Review/Format/Upload Docket Entries re Scheduling Order/Withdrawal of Counsel, Fwd to John, Updating Calendar/Case Tracking, E-Mail to Don re Telephone Status Conference.	S.D.	150.00	.40	\$60.00
4/7/2021	Review/respond to email from client re: deposition planning	D.S.	550.00	.20	\$110.00
4/7/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.80	\$120.00
4/7/2021	Shaye Brown dep prep-meeting with Don and Lisa	J.B.	400.00	1.00	\$400.00
4/7/2021	Discovery-Shaye Brown deposition prep	J.B.	400.00	2.00	\$800.00
4/7/2021	Prepare for client meeting (SBC) re: deposition preparation; Zoom deposition preparation with SBC and J. Burke; follow-up meeting with J. Burke and L. Quartarolo	D.S.	550.00	3.90	\$2,145.00
4/8/2021	Attention to Don's E-Mail re Teleconferences, Call to Chambers re Teleconferences.	S.D.	150.00	.10	\$15.00
4/8/2021	E-Mail to Lisa/Don re Discovery Status.	S.D.	150.00	.10	\$15.00

4/8/2021	Review/Format/Upload Docket Entries re J.A. Notices of Appearance re Fichera.	S.D.	150.00	.10	\$15.00
4/8/2021	Gathering Attorney Correspondence for Discovery cont.	S.D.	150.00	.20	\$30.00
4/8/2021	Review/Format/Upload Text Order re Telephone Status Conference, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
4/8/2021	Attention to Don's E-Mail re Client Deposition, Updating Calendar.	S.D.	150.00	.20	\$30.00
4/8/2021	Gathering Attorney Correspondence for Discovery cont., E-mail to Don/Lisa.	S.D.	150.00	1.10	\$165.00
4/8/2021	Discovery-deposition prep for Shaye Brown	J.B.	400.00	1.00	\$400.00
4/8/2021	Discovery-reviewed Shaye Brown's personal emails	J.B.	400.00	1.00	\$400.00
4/8/2021	Discovery-Deposition prep for Shaye Brown	J.B.	400.00	2.00	\$800.00
4/8/2021	Attention to client preparation for deposition on 4/9; correspondence re: ESI status update; review search terms by client	L.Q.	500.00	2.00	\$1,000.00
4/8/2021	Prepare for second day of prep for SBC deposition; prep session with S. Brown; follow-up emails re: deposition	D.S.	550.00	2.70	\$1,485.00
4/9/2021	Review/Format/Upload Docket Notices re Minute Entry/Setting Motion Date, Updating Calendar/Case Tracking.	S.D.	150.00	.10	\$15.00
4/9/2021	Review/Format/Upload Docket Entry re Motion to Compel, Fwd to John.	S.D.	150.00	.20	\$30.00

4/9/2021	Attention to reviewing documents produced by njdoe.	J.D.R.	690.00	2.50	\$1,725.00
4/9/2021	attended Shaye Brown's deposition	J.B.	400.00	7.50	\$3,000.00
4/9/2021	S.B.C Deposition; pre-deposition review of documents from DOJ; post-deposition debrief	L.Q.	500.00	9.00	\$4,500.00
4/9/2021	Attend to email from adversary with link to deposition exhibits; participate in deposition of plaintiff SBC; follow-up call	D.S.	550.00	8.50	\$4,675.00
4/10/2021	prepare Sweeton litigation timeline	M.P.C.	300.00	1.00	\$300.00
4/10/2021	Prepare Hallie-Selassie litigation timeline	M.P.C.	300.00	1.00	\$300.00
4/11/2021	prepare Hallie Selassie litigation timeline	M.P.C.	300.00	1.50	\$450.00
4/12/2021	Attention to notes from deposition to prepare deposition of other clients; correspondence re: client ESI transfer	L.Q.	500.00	.50	\$250.00
4/13/2021	Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.10	\$15.00
4/13/2021	Call back from Plaintiff Osborn re Schedule John Call, Scheduling Call.	S.D.	150.00	.10	\$15.00
4/13/2021	corresponded with Sean for 2 emails re call time availability	M.P.C.	300.00	.20	\$60.00
4/13/2021	Cal, to Plaintiff Paredes re Schedule Call w John, Scheduling Call, E-Mail to John/Johanna re Prior Appointment, Call to Plaintiff Osborn re Schedule Call, E-Mails w Johanna/John re Client	S.D.	150.00	.70	\$105.00

Calls, Call to Plaintiff Sweeten, Scheduling Call w John, E-Mails w John/Johanna re Deposition Prep Calls.					
4/13/2021	Attention to status of review of .pst file and strategy for additional review	L.Q.	500.00	.30	\$150.00
4/14/2021	Discovery-meeting with John	J.B.	400.00	.50	\$200.00
4/14/2021	Discovery-researching court interpreter	J.B.	400.00	.50	\$200.00
4/15/2021	Review internal email re: costs of translator; brief research re: same; recommendation for follow-up	D.S.	550.00	.50	\$275.00
4/15/2021	Discovery-prepared deposition questions-Shaye Brown	J.B.	400.00	2.00	\$800.00
4/16/2021	Attention to discussion re: translation services for deposition	L.Q.	500.00	.10	\$50.00
4/16/2021	Review respond to email from co-counsel; attend to same	D.S.	550.00	.20	\$110.00
4/16/2021	Discovery-reviewed Shaye Brown's personal emails	J.B.	400.00	1.50	\$600.00
4/20/2021	Review/Format/Upload J.A. Docket Entries Opposing Motion to Consolidate, Fwd to John.	S.D.	150.00	.20	\$30.00
4/20/2021	Follow-up E-Mail to John re Plaintiff Calls, Calling Plaintiffs re Schedule Call w John, Calls to John/Krista re Scheduling, E-Mail to Lisa re Calls Scheduled.	S.D.	150.00	.50	\$75.00
4/21/2021	Converting Attorney Correspondence to .pst Files cont.	S.D.	150.00	.10	\$15.00

4/21/2021	Converting Attorney Correspondence to .pst Files cont.	S.D.	150.00	.10	\$15.00
4/21/2021	Converting Attorney Correspondence to .pst Files cont.	S.D.	150.00	.10	\$15.00
4/21/2021	Call from John re J.A. Docket File.	S.D.	150.00	.10	\$15.00
4/21/2021	Call to Pltf Gilliam re Schedule Call w John, Follow-up E-Mail to Pltf.	S.D.	150.00	.20	\$30.00
4/21/2021	E-Mail from Lisa re Brown-Crandol Files, Working on Converting Attorney Correspondence to .pst Files.	S.D.	150.00	.20	\$30.00
4/21/2021	Attention to John's E-Mail re J.A. Docket, Pulling Requested File from J.A. Docket, Fwd to John, Review/Format/Upload Docket Report/Docket Entry.	S.D.	150.00	.20	\$30.00
4/21/2021	Review emails between counsel re discovery issues	J.D.R.	690.00	.60	\$414.00
4/21/2021	Attention to completing review of attorney emails for SBC and LG; correspondence with Doe Family re: ESI collection and transfer	L.Q.	500.00	1.70	\$850.00
4/21/2021	Review and revise letter to soranno	J.D.R.	690.00	1.50	\$1,035.00
4/21/2021	Continued attention to draft brief	J.D.R.	690.00	3.50	\$2,415.00
4/22/2021	Attention to Gilliam E-Mail re Deposition Prep. Call, Scheduling Call.	S.D.	150.00	.10	\$15.00
4/22/2021	Working on Gathering .pst Files cont.	S.D.	150.00	.40	\$60.00

4/22/2021	Comments on letter to adversary	J.D.R.	690.00	.80	\$552.00
4/22/2021	Continued attention to draft brief; emails with co-counsel re same	J.D.R.	690.00	1.50	\$1,035.00
4/22/2021	Communications with co-counsel re various discovery issues.	J.D.R.	690.00	1.90	\$1,311.00
4/23/2021	Working on Converting Attorney Correspondence to .pst Files cont., E-Mail to Lisa.	S.D.	150.00	.20	\$30.00
4/23/2021	Attention to Sweeten Deposition Notice, Review/Format/Upload Notice/Correspondence re Deposition, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
4/23/2021	Attention to preparation for next client deposition; update status of ESI for deponent	L.Q.	500.00	.80	\$400.00
4/23/2021	Emails with adversary; related emails with co-counsel	J.D.R.	690.00	.60	\$414.00
4/23/2021	Comment on letter to DAG re discovery.	J.D.R.	690.00	1.20	\$828.00
4/26/2021	Downloading Docket Report, Attention to Documents on Google Drive.	S.D.	150.00	.20	\$30.00
4/26/2021	Review/Format/Upload Docket Entries re J.A. Motion to Consolidate, Fwd to John.	S.D.	150.00	.20	\$30.00
4/26/2021	E-Mail to Don re Storjohann E-Mail Recovery, Calls to Crimmel/Burke re Deposition Prep Calls.	S.D.	150.00	.20	\$30.00
4/26/2021	E-Mails w Burke re Brown-Crandol Exhibits, Downloading from OAG, Uploading to Sharepoint, E-Mail to John.	S.D.	150.00	.20	\$30.00

4/26/2021	Call to Sweeten re Reschedule Deposition Call, Call to John, Rescheduling Sweeten Call, Call to Osborn re Reschedule Call, Rescheduling Call, Call to Strunk re Reschedule Call, E-Mail to Lisa re Call Schedule.	S.D.	150.00	.30	\$45.00
4/26/2021	Meeting w John re Discovery.	S.D.	150.00	.40	\$60.00
4/26/2021	E-Mails w John re Deposition Calls, Call to Paredes re Reschedule Call, Attention to Scheduling cont., Call to Crimmel re Schedule Deposition Calls.	S.D.	150.00	.40	\$60.00
4/26/2021	E-Mails to Burke/Crimmel re Deposition Prep Meetings, E-Mail to Lisa/Don/Burke re Discovery Status, Attention to Deposition Notice re M.M., Updating Calendar/Case Tracking, E-Mails w Burke re Exhibits.	S.D.	150.00	.50	\$75.00
4/26/2021	Attention to review of AS family attorney emails; update on meetings with client; organization of discovery	L.Q.	500.00	.70	\$350.00
4/26/2021	Legal research and analysis re MtC	J.D.R.	690.00	.60	\$414.00
4/26/2021	Review opposition brief; legal research re privilege issues.	J.D.R.	690.00	1.50	\$1,035.00
4/27/2021	Call back to Paredes re Reschedule Deposition Prep. Call, Rescheduling Call.	S.D.	150.00	.10	\$15.00
4/27/2021	Sending Update re Deposition Calls Schedule to Lisa.	S.D.	150.00	.10	\$15.00
4/27/2021	Review/Format/Upload Docket Entry re Exhibits to Opposition to Motion to Compel, Fwd to John.	S.D.	150.00	.10	\$15.00
4/27/2021	Review/Format/Upload Docket Entries re Def. Opposition to Motion to Compel, Fwd to John.	S.D.	150.00	.20	\$30.00

4/27/2021	Review Cathy Anthony deposition transcript.	J.D.R.	690.00	1.80	\$1,242.00
4/27/2021	Review Cathy Anthony deposition exhibits.	J.D.R.	690.00	2.20	\$1,518.00
4/28/2021	Attention to correspondence with adversary re privilege issues	J.D.R.	690.00	.90	\$621.00
4/29/2021	E-Mails w Plaintiff Gilliam re Deposition Prep/Zoom Link, E-mails w Lisa re Schedule Discovery Calls.	S.D.	150.00	.10	\$15.00
4/29/2021	E-Mails w Lisa re Discovery Call, Scheduling Meeting re Discovery w Lisa, Attempting to Schedule Call w Lisa/John, E-Mails w John re Scheduling.	S.D.	150.00	.10	\$15.00
4/29/2021	Call from John re Gilliam Deposition Prep., Reviewing ESI Collection Procedures for Call.	S.D.	150.00	.20	\$30.00
4/29/2021	Follow-up Call w John re Deposition prep. Calls.	S.D.	150.00	.20	\$30.00
4/29/2021	Pulling Instructions re .pst Files Collection for Pltf. Gilliam, Fwd to Client.	S.D.	150.00	.20	\$30.00
4/29/2021	Zoom Meeting w John/Gilliam re Deposition Prep./Discovery Documents.	S.D.	150.00	.40	\$60.00
4/29/2021	Call from John re Haile-Selassie Deposition Prep. Meeting, Meeting w Client, Sending Follow-up E-Mail to Client/Hogan re .pst Files Collection.	S.D.	150.00	.50	\$75.00
4/29/2021	Meeting w Lisa re Discovery Status, Cleanup re Discovery Files w Lisa.	S.D.	150.00	.90	\$135.00
4/29/2021	Deposition prep- Hallie-Selassie	M.P.C.	300.00	.50	\$150.00



4/29/2021	Further attention to research and analysis of deliberative process privilege.	J.D.R.	690.00	2.30	\$1,587.00
4/29/2021	Attention to review of JRA attorney emails; streamlining discovery folders; identification of documents for supplemental disclosure	L.Q.	500.00	3.50	\$1,750.00
4/30/2021	Sending Follow-up E-Mail to Sweeten re .pst Files Collection.	S.D.	150.00	.10	\$15.00
4/30/2021	Pltf Meeting re Deposition Prep. w Sweeten.	S.D.	150.00	.70	\$105.00
4/30/2021	Deposition prep for Sweeton	M.P.C.	300.00	.80	\$240.00
4/30/2021	Attention to review of JRA attorney emails and identification of documents for supplemental disclosure	L.Q.	500.00	2.70	\$1,350.00
5/2/2021	Deposition outline prep for Sweeton	M.P.C.	300.00	.50	\$150.00
5/4/2021	Review/Format/Upload Docket Entry re Herlihy Notice of Appearance, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00
5/4/2021	Deposition prep AS	J.D.R.	690.00	1.40	\$966.00
5/6/2021	Zoom Meeting w Plaintiff Osborn re Deposition Prep/Discovery.	S.D.	150.00	.60	\$90.00
5/7/2021	E-mail to Hogan re Osborn .pst Files.	S.D.	150.00	.20	\$30.00
5/7/2021	E-Mails w Hogan/Client re Osborn .pst Files for Discovery, Working on Recovering Storjohann E-Mails for Discovery cont., Follow-up E-Mail to Krista.	S.D.	150.00	.30	\$45.00

5/7/2021	Attention to discovery issues	K.H.	550.00	.70	\$385.00
5/7/2021	Attention to review of DOE discovery response; discussion re: deficiency letter	L.Q.	500.00	.90	\$450.00
5/8/2021	Deposition prep for Sweeton	M.P.C.	300.00	1.00	\$300.00
5/8/2021	Debrief on MM deposition; follow-up to same; preparation for AS deposition.	J.D.R.	690.00	2.50	\$1,725.00
5/10/2021	Call from Crimmel re Sweeten Attorney to Attorney Files, Attention to Files.	S.D.	150.00	.10	\$15.00
5/10/2021	Deposition prep outline for Sweeton, Zoom with John	M.P.C.	300.00	2.30	\$690.00
5/10/2021	Deposition prep, AS deposition.	J.D.R.	690.00	2.50	\$1,725.00
5/10/2021	Further attention to deposition prep.	J.D.R.	690.00	3.50	\$2,415.00
5/11/2021	Attention to E-Mails w Osborn re Discovery, E-Mail to John, Call from John, Purchasing Software re Collection of Client's Comcast Files for Discovery.	S.D.	150.00	.10	\$15.00
5/11/2021	Downloading Docket Report, Updating Google Drive Documents.	S.D.	150.00	.10	\$15.00
5/11/2021	E-Mails w Osborn/Hogan re .pst Files Collection for Discovery.	S.D.	150.00	.20	\$30.00
5/11/2021	Deposition prep with Sweeton via Zoom	M.P.C.	300.00	2.00	\$600.00

5/11/2021	AS deposition prep; further attention to review of transcript of SBC deposition transcript.	J.D.R.	690.00	5.30	\$3,657.00
5/12/2021	Attention to Krista E-Mail re Storjohann Files for Discovery, Moving Files to Discovery Folder, Downloading .pst Files for Review.	S.D.	150.00	.10	\$15.00
5/12/2021	Further attention to SBC transcript; prep for AS deposition; legal research re deposition protocols.	J.D.R.	690.00	5.30	\$3,657.00
5/13/2021	Call from Paredes, Call to Johanna, Fwd Call to Johanna.	S.D.	150.00	.10	\$15.00
5/13/2021	E-Mails w Hogan re FTP for Client Files for Discovery.	S.D.	150.00	.10	\$15.00
5/13/2021	Follow-up E-Mail to Osborn re Discovery Instructions.	S.D.	150.00	.30	\$45.00
5/13/2021	Attention to USDNJ oral argument in FH v. West	L.Q.	500.00	.70	\$350.00
5/13/2021	Attention to correspondence with DAG re discovery issues	J.D.R.	690.00	2.20	\$1,518.00
5/14/2021	Attention to E-Mails re Schedule Strunk Deposition Prep, Call to Client, Scheduling Deposition Prep Meeting.	S.D.	150.00	.10	\$15.00
5/14/2021	E-Mails w John re Osborn E-Mails for Discovery, Call w John re Discovery, E-Mail to Client.	S.D.	150.00	.10	\$15.00
5/14/2021	Call from Strunk re Schedule Deposition Prep Meeting, E-Mail to Johanna re Client Call.	S.D.	150.00	.20	\$30.00
5/14/2021	Deposition prep with Sweeton, John, and tom O'leary	M.P.C.	300.00	.50	\$150.00

5/14/2021	Sweeton Deposition	M.P.C.	300.00	3.50	\$1,050.00
5/14/2021	Deposition prep; attendance at deposition; follow-up to same.	J.D.R.	690.00	8.80	\$6,072.00
5/17/2021	Follow-up E-Mail to Johanna re Strunk Files for Discovery.	S.D.	150.00	.10	\$15.00
5/17/2021	Attention to Burke E-Mail re Brown Crandol Deposition Transcript, Attention to Files re Transcript, E-Mail to John.	S.D.	150.00	.10	\$15.00
5/17/2021	Downloading Docket Report, Updating Google Drive Documents, Review/Format/Upload Copies of B-C Deposition, Fwd to Johanna.	S.D.	150.00	.20	\$30.00
5/17/2021	Preparing for/Attending Deposition Prep Meeting w Strunk, Extended Meeting w Client re Gathering Files.	S.D.	150.00	.90	\$135.00
5/18/2021	E-Mails w John/Don/Johanna re .pst Files for Discovery.	S.D.	150.00	.10	\$15.00
5/19/2021	Attention to deposition scheduling issues (MM).	J.D.R.	690.00	.60	\$414.00
5/19/2021	Attention to document collection (SBC).	J.D.R.	690.00	1.50	\$1,035.00
5/19/2021	Attention to document collection (AAS).	J.D.R.	690.00	1.50	\$1,035.00
5/20/2021	E-mails w Johanna re Strunk E-Mails for Discovery Production.	S.D.	150.00	.10	\$15.00
5/20/2021	E-Mails w Johanna/John re Discovery Status/Production.	S.D.	150.00	.10	\$15.00



5/20/2021	E-Mails w Hogan/Don/Johanna re Strunk E-Mails for Discovery.	S.D.	150.00	.10	\$15.00
5/20/2021	E-Mails w Johanna/Don re Discovery Status/Production cont.	S.D.	150.00	.10	\$15.00
5/20/2021	Further E-Mails to Johanna/Don/Hogan re Discovery Status.	S.D.	150.00	.20	\$30.00
5/20/2021	Review/respond to email re: status of document production as to M. Strunk	D.S.	550.00	.20	\$110.00
5/20/2021	Attention to strunk document discovery issues	J.D.R.	690.00	.60	\$414.00
5/21/2021	Attention to document collection (AAS/SBC).	J.D.R.	690.00	1.50	\$1,035.00
5/21/2021	Legal research re deliberative process privilege; review memorandum.	J.D.R.	690.00	1.80	\$1,242.00
5/24/2021	Call from O'Leary for John, Call to John.	S.D.	150.00	.10	\$15.00
5/24/2021	Meeting w Paredes re Discovery/Deposition Prep., Sending .pst Instructions to Johanna.	S.D.	150.00	.60	\$90.00
5/24/2021	OAL Decision Spreadsheet-2021 work.	S.S.	150.00	.80	\$120.00
5/24/2021	2021 OAL Decision spreadsheet	S.S.	150.00	1.80	\$270.00
5/24/2021	Attention to draft correspondence to AG's office.	J.D.R.	690.00	1.20	\$828.00

5/24/2021	Initial meeting with CP re deposition prep.	J.D.R.	690.00	1.50	\$1,035.00
5/24/2021	Close attention to spreadsheet tracking cases in OAL.	J.D.R.	690.00	3.20	\$2,208.00
5/25/2021	Downloading Docket Report, Updating Google Drive Documents.	S.D.	150.00	.10	\$15.00
5/25/2021	OAL 2021 spreadsheet.	S.S.	150.00	.20	\$30.00
5/25/2021	Email communication re settlement strategy. Legal research re same.	J.D.R.	690.00	.80	\$552.00
5/25/2021	Preliminary attention to LG deposition prep, and document collection.	J.D.R.	690.00	1.50	\$1,035.00
5/25/2021	Attention to document collection re LG, CHS.	J.D.R.	690.00	2.40	\$1,656.00
5/25/2021	Close attention to documents produced by njdoe.	J.D.R.	690.00	2.50	\$1,725.00
5/26/2021	Discovery Prep-Lateefah Gilliam	J.B.	400.00	.50	\$200.00
5/26/2021	Attention to emails from co-counsel re discovery motion	J.D.R.	690.00	.40	\$276.00
5/26/2021	Attention to letter to DAG re discovery issues	J.D.R.	690.00	.80	\$552.00
5/26/2021	OAL Decision Spreadsheet, filling in hearing info for 2020, 2019 decisions.	S.S.	150.00	3.50	\$525.00

5/27/2021	E-Mail from John re Storjohann Files, Fwd Files to Hogan.	S.D.	150.00	.10	\$15.00
5/27/2021	Working on Gathering Storjohann Correspondence Responsive to Discovery cont., Uploading, E-mail to John/Don/Krista.	S.D.	150.00	.30	\$45.00
5/27/2021	Working on Gathering Storjohann Correspondence Responsive to Discovery.	S.D.	150.00	.40	\$60.00
5/27/2021	Working on Gathering Storjohann Correspondence Responsive to Discovery cont.	S.D.	150.00	.40	\$60.00
5/27/2021	OAL Decision spreadsheet, work on 2018 Decisions and determining hearings held to adjudicate cases.	S.S.	150.00	3.70	\$555.00
5/28/2021	OAL 2018/2019/2020/2021 consistency check.	S.S.	150.00	.20	\$30.00
5/28/2021	Discovery prep-Lateefah Gilliam	J.B.	400.00	.50	\$200.00
5/28/2021	OAL spreadsheet continuation of continuity/consistency for the 'Hearing Status' and 'Other Notes' columns	S.S.	150.00	2.10	\$315.00
6/1/2021	Downloading Docket Report, Updating Google Drive Documents.	S.D.	150.00	.10	\$15.00
6/1/2021	Scan/Review/Format/Upload Invoice re Transcript re Brown-Crandol Deposition, Fwd to Beth/John.	S.D.	150.00	.10	\$15.00
6/1/2021	OAL Spreadsheet getting hearing statuses.	S.S.	150.00	.30	\$45.00
6/3/2021	E-Mails w Hogan re Discovery Production/Files Access.	S.D.	150.00	.10	\$15.00



6/3/2021	Discovery Prep-Cecilia Paredes	J.B.	400.00	1.00	\$400.00
6/4/2021	OAL Spreadsheet work.	S.S.	150.00	.20	\$30.00
6/4/2021	OAL Spreadsheet ALJ work.	S.S.	150.00	.20	\$30.00
6/4/2021	OAL Spreadsheet, updating ALJ sheets.	S.S.	150.00	.40	\$60.00
6/4/2021	OAL Spreadsheet work on ALJ's and Hearings.	S.S.	150.00	.80	\$120.00
6/7/2021	Downloading Docket Report, Updating Google Drive Documents.	S.D.	150.00	.10	\$15.00
6/7/2021	Attention to correspondence to court re: subpoena and deliberative process	L.Q.	500.00	.30	\$150.00
6/7/2021	Attention to comments on draft correspondence. Further attention to document collection (CHS).	J.D.R.	690.00	2.60	\$1,794.00
6/8/2021	Sending Access to Sharefile Discovery Files to Hogan, Uploading Storjohann Correspondence.	S.D.	150.00	.20	\$30.00
6/8/2021	Review correspondence from co-counsel and proposed letter	D.S.	550.00	.10	\$55.00
6/8/2021	Discovery Prep-Cecilia Paredes	J.B.	400.00	2.00	\$800.00
6/9/2021	Attention to Receipt of Deposition Notice re M.M., Scan/Review/Format/Upload, Sending to John/Don, Filing Paper Copy.	S.D.	150.00	.10	\$15.00

6/9/2021	Attention to John's E-Mail re Change of Address Notice, Preparing Notice cont., E-Mailing to Herlihy/Soranno, Preparing Paper Transmittal cont.	S.D.	150.00	.20	\$30.00
6/9/2021	Dropping Notice re Address Change in Local USPS Drop-Box.	S.D.	150.00	.20	\$30.00
6/9/2021	Attention to john's E-Mail re Deposition Notice, Drafting Address Change Notification to Attorney General's Office, Sending to John.	S.D.	150.00	.30	\$45.00
6/14/2021	Sweeton deposition	M.P.C.	300.00	2.50	\$750.00
6/15/2021	Call from Saraya re Deposition Files, Attention to Files.	S.D.	150.00	.10	\$15.00
6/15/2021	Downloading Docket Report, Updating Google Drive Documents.	S.D.	150.00	.20	\$30.00
6/15/2021	Zoom Meeting w John/Don/Saraya re Fee Application.	S.D.	150.00	.30	\$45.00
6/15/2021	Meeting about Fee Application with DS, JR, and SD. Discussed what/how to draft, what attorneys we need hours from. Talked about Don's method of using Excel to autofill CaseFox entries, which will be valuable as we move forward.	S.S.	150.00	.80	\$120.00
6/15/2021	Discovery: Deposition prep-Lateefah Gilliam	J.B.	400.00	1.50	\$600.00
6/16/2021	E-Mail to Lisa re Saraya/Class Action Fee Application, E-Mails w Johanna/Hogan re Paredes Discovery Production.	S.D.	150.00	.10	\$15.00
6/16/2021	Attention to E-Mail from Don re Discovery Production, Review/Format/Upload Production Files.	S.D.	150.00	.20	\$30.00

6/16/2021	Attention to John E-Mail re Discovery Production, Scheduling Meeting ew Discovery Production.	S.D.	150.00	.20	\$30.00
6/16/2021	Review internal email; draft email to co-counsel re: password for document production	D.S.	550.00	.10	\$55.00
6/17/2021	Locating/Sending Sample Fee Application to Saraya re Fee Application Assignment.	S.D.	150.00	.10	\$15.00
6/17/2021	E-Mail from Don/John re Gilliam Deposition Exhibits, Download/Review/Format Exhibits, Uploading to Sharepoint.	S.D.	150.00	.20	\$30.00
6/17/2021	Discovery: Attended deposition Lateefah Gilliam	J.B.	400.00	3.50	\$1,400.00
6/18/2021	Review of Kaifa fee application materials.	S.S.	150.00	.30	\$45.00
6/18/2021	Kaifa review, discussion with Beth on the phone about the fee application case.	S.S.	150.00	.30	\$45.00
6/18/2021	Review of Kaifa documents from Sean for fee application work.	S.S.	150.00	.40	\$60.00
6/18/2021	2018-2021 OAL Spreadsheet work (updating, formatting, distributing new text in the correct spreadsheets.	S.S.	150.00	.50	\$75.00
6/18/2021	OAL Spreadsheet work (2018-2021 decisions).	S.S.	150.00	.50	\$75.00
6/18/2021	2018-2021 OAL Spreadsheet work.	S.S.	150.00	1.80	\$270.00
6/21/2021	Downloading Docket Report, Uploading, Attention to Maintaining Google Drive Documents.	S.D.	150.00	.20	\$30.00

6/22/2021	OAL Spreadsheet- taking data from 2021 and filling in judge sheets.	S.S.	150.00	.10	\$15.00
6/22/2021	OAL Spreadsheet- 2021 data into judge sheets.	S.S.	150.00	.10	\$15.00
6/22/2021	Attention to Review of Latiah's Billing Entries re Prepare for Fee Application.	S.D.	150.00	.20	\$30.00
6/22/2021	Reviewing Latiah's Billing Entries for Fee Application cont.	S.D.	150.00	1.00	\$150.00
6/23/2021	OAL Spreadsheet work, checking if cases from 2021 have been appealed.	S.S.	150.00	.90	\$135.00
6/24/2021	Zoom meeting w John/Don/Matthew/Johanna/Saraya re Discovery Production Status.	S.D.	150.00	.30	\$45.00
6/24/2021	Discovery work related to Strunk documents- first client to start with.	S.S.	150.00	.30	\$45.00
6/24/2021	Class Action meeting re discovery production, related to producing emails and other documents. Discussion of how we will proceed with discovery.	S.S.	150.00	.40	\$60.00
6/24/2021	Zoom with firm on ESI confidentiality review	M.P.C.	300.00	.50	\$150.00
6/24/2021	Internal team call re: discovery	D.S.	550.00	.30	\$165.00
6/25/2021	Communicated with Lisa- 2 emails re clients email adresses	M.P.C.	300.00	.20	\$60.00
6/25/2021	Strunk discovery work from SharePoint.	S.S.	150.00	.40	\$60.00

6/25/2021	Attention to Discovery and production of documents.	S.S.	150.00	.60	\$90.00
6/25/2021	Work on production spreadsheet for Strunk docs.	S.S.	150.00	.90	\$135.00
6/25/2021	Spreadsheet tracking production of Strunk documents from SharePoint.	S.S.	150.00	1.10	\$165.00
6/28/2021	Downloading Docket Report.	S.D.	150.00	.10	\$15.00
6/28/2021	corresponded via email with John re getting in touch with clients to produce ESI in their private emails	M.P.C.	300.00	.10	\$30.00
6/28/2021	Internal emails re: witness document collection	D.S.	550.00	.10	\$55.00
6/28/2021	Emails re: status call	D.S.	550.00	.20	\$110.00
6/28/2021	Aggregated time worked on the Class Action on 6/28/2021. Attention to spreadsheet tracking discovery and production for class action plaintiffs.	S.S.	150.00	2.40	\$360.00
6/28/2021	Attendance at team conference call to discuss discovery issues and strategy	L.Q.	500.00	1.00	\$500.00
6/28/2021	Team call to plan for discovery	D.S.	550.00	1.10	\$605.00
6/28/2021	Team call; follow-up to same.	J.D.R.	690.00	1.10	\$759.00
6/28/2021	Attention to correspondence between adversary and USMJ; response to same	J.D.R.	690.00	2.20	\$1,518.00

6/28/2021	Strategy and planning discovery.	J.D.R.	690.00	2.50	\$1,725.00
6/28/2021	Attention to drafting letter to Judge Williams	J.D.R.	690.00	2.50	\$1,725.00
6/29/2021	Review/Format/Upload Correspondence re Discovery Production.	S.D.	150.00	.10	\$15.00
6/29/2021	Updating Calendar/Case Tracking/Trial Calendar cont., Updating Google Drive Documents.	S.D.	150.00	.20	\$30.00
6/29/2021	Review/Format/Upload Docket Entries/Notices re Trial Notice/Statement of Litigation Funding/Letter Requesting Teleconference, Fwd to John, Updating Calendar/Case Tracking/Trial Calendar.	S.D.	150.00	.30	\$45.00
6/29/2021	Attention spreadsheet tracking Discovery, inventory of documents.	S.S.	150.00	1.70	\$255.00
6/30/2021	Review/Format/Upload Text Order re O'Leary Letter, Updating Calendar.	S.D.	150.00	.10	\$15.00
6/30/2021	Call w Crimmel re Haile-Selassie Production for Discovery, E-Mails w Hogan re Plaintiff Contact for Collection.	S.D.	150.00	.20	\$30.00
7/1/2021	E-Mail from Matthew re Haile-Selassie .pst Files for Discovery, Call from Matthew re .pst Files, Zoom Meeting w Matthew re Access .pst Files.	S.D.	150.00	.30	\$45.00
7/1/2021	Zoom with Sean re protocol for ESI review and placement of Hail-Selassie	M.P.C.	300.00	.30	\$90.00
7/1/2021	Work on ESI Spreadsheet to track discovery of documents, attention to discoverable documents in SharePoint.	S.S.	150.00	.90	\$135.00

7/2/2021	Continued work on ESI Spreadsheet tracking discovery.	S.S.	150.00	.30	\$45.00
7/2/2021	Telephone Conference with J. Rue re: potential witnesses and preparation for team call	D.S.	550.00	.50	\$275.00
7/2/2021	Team call	D.S.	550.00	.70	\$385.00
7/2/2021	Attention to strategy re potential witnesses; Team call; preparation for and followup to same	J.D.R.	690.00	2.30	\$1,587.00
7/5/2021	Attention to additional documents for Sanders deposition	L.Q.	500.00	.50	\$250.00
7/6/2021	Review/Format /Upload Docket Entry/Text Order re Discovery Letter/Trial Length, Fwd to John, Updating Calendar/Case Tracking, Reminder E-Mail to John/Don/Krista re Letter to Court, Downloading Docket Report from PACER, Updating Google Drive Documents.	S.D.	150.00	.30	\$45.00
7/6/2021	Preparing Shell Letter to Judge Hillman , Sending to John, E-Mail from John re Letter to Judges, Formatting Letter to Judge Hillman/Williams, Sending to John/Don.	S.D.	150.00	.40	\$60.00
7/6/2021	Review and revise letter to Judge Hillman	K.H.	550.00	.50	\$275.00
7/6/2021	Attention to discovery, going through SharePoint Documents to inventory what has been produced and what has not re Strunk documents, using excel file to track progress and duplicates.	S.S.	150.00	3.50	\$525.00
7/7/2021	Finalize letter to Judge Hillman and file same	D.S.	550.00	.50	\$275.00
7/7/2021	Attention to discovery, going through SharePoint Documents to inventory what has been produced and what has not re Strunk documents, using excel file to track progress and duplicates.	S.S.	150.00	2.00	\$300.00

7/7/2021	Attention to collection of documents for depositions of ALJ Sanders and Bass; court filings;	L.Q.	500.00	.80	\$400.00
7/8/2021	Attention to E-Mails re Subpoena on Judge Bass, Call to Son re Subpoena, Fwd E-Mails to Saraya.	S.D.	150.00	.10	\$15.00
7/8/2021	Review/Format/Upload Docket Entries/Text Order re Status Teleconference/J.A. Supplemental Information/Correspondence re Trial Length, Fwd to John, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
7/8/2021	Attend to collection and analysis of documents	D.S.	550.00	1.20	\$660.00
7/8/2021	Attention to discovery issues	J.D.R.	690.00	1.10	\$759.00
7/8/2021	Attention to discovery, going through SharePoint Documents to inventory what has been produced and what has not re Strunk documents, using excel file to track progress and duplicates. Working within the Collection-Strunk folder and subfolders.	S.S.	150.00	6.50	\$975.00
7/9/2021	Working on Strunk production, inventorying documents.	S.S.	150.00	.20	\$30.00
7/9/2021	Review/comment on draft letter to Judge Williams re: status conference	D.S.	550.00	.10	\$55.00
7/9/2021	Team call re: discovery end date	D.S.	550.00	.30	\$165.00
7/9/2021	Review/revise draft email to adversary	D.S.	550.00	.30	\$165.00
7/9/2021	Finalize Subpoena and Notice; draft transmittal letter and attention to service of same	D.S.	550.00	.40	\$220.00



7/9/2021	Attention to discovery, going through SharePoint Documents to inventory what has been produced and what has not re Strunk documents, using excel file to track progress and duplicates. Working within the Collection-Strunk folder and subfolders.	S.S.	150.00	1.50	\$225.00
7/9/2021	Review email from co-counsel; draft subpoena to ALJ Bass; draft amended notice of intent to serve subpoena; email re: same	D.S.	550.00	.70	\$385.00
7/9/2021	Attention to emails with adversary; attention to R45 discovery papers	J.D.R.	690.00	2.10	\$1,449.00
7/12/2021	Review/Format/Upload Docket Entries re Correspondence re Conference Call/Discovery, Fwd to John, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.30	\$45.00
7/12/2021	Emails and phone call re: discovery status	D.S.	550.00	.30	\$165.00
7/12/2021	Attention to production of documents. tracking what's already been produced for 7 plaintiffs, where we should pick up, coordinating with Matt Crimmel, managing Haile-Selassie PST file and redaction of documents for Matt. Getting information from Matt about what to produce for Osborn and Sweeten as well.	S.S.	150.00	4.70	\$705.00
7/12/2021	Preparation for SBC deposition	J.D.R.	690.00	1.50	\$1,035.00
7/12/2021	Draft email to S. Brown re: additional documents; review email collection	D.S.	550.00	2.10	\$1,155.00
7/13/2021	E-Mails w Saraya/Don r eDiscovery/.pst Files.	S.D.	150.00	.10	\$15.00
7/13/2021	E-Mails w John re Scheduled Meeting, Cancelling Meeting.	S.D.	150.00	.10	\$15.00

7/13/2021	Review/Format/Upload Text Order Rescheduling Status Teleconference, Updating Calendar/Case Tracking.	S.D.	150.00	.10	\$15.00
7/13/2021	E-Mails w Johanna/Matthew/John/Don re eDiscovery Production, Attention to Files re Discovery Production.	S.D.	150.00	.20	\$30.00
7/13/2021	Call w John/Saraya re Discovery Production Status, Attention to Files re Discovery Status.	S.D.	150.00	.90	\$135.00
7/13/2021	E-Mails w Saraya re Call w Don, Calls from Saraya/Conference Call w Saraya/Don re Discovery Status/.pst Files, Downloading Paredes Client .pst Files from Walsh Firm, Uploading to Sharepoint, E-Mail to Matthew/Johanna re .pst Files, E-Mail to Hogan re Discovery Status.	S.D.	150.00	1.10	\$165.00
7/13/2021	Call with Don/Sean re Discovery, PST files, reviewing Pst files, discussion of which attorneys are handling which clients, working with Crimmel re Strunks, Haile-Selassie, Sweeten, and Osborn.	S.S.	150.00	1.90	\$285.00
7/13/2021	Attention to OAL documentation re: ALJ training; research/compare to annual Lehigh Special Education Law conferences held May 2014-2019	L.Q.	500.00	.80	\$400.00
7/13/2021	Further attention to discovery; assessment of production; preparation for CMC next week.	J.D.R.	690.00	4.40	\$3,036.00
7/14/2021	Attention to Class Action Files re Discovery Production cont.	S.D.	150.00	.10	\$15.00
7/14/2021	E-Mails w John/Don re Subpoena Service on Judge Bass.	S.D.	150.00	.10	\$15.00
7/14/2021	Call from Hogan for Saraya, Transfer to Saraya.	S.D.	150.00	.10	\$15.00
7/14/2021	E-Mails w John re Judge Bass Subpoena, Attention to Files re Discovery cont.	S.D.	150.00	.10	\$15.00

7/14/2021	Attention to Files re Discovery cont.	S.D.	150.00	.10	\$15.00
7/14/2021	Attention to Files re Discovery Status.	S.D.	150.00	.20	\$30.00
7/14/2021	Call from John re Subpoena on Judge Bass, Attention to Files re Subpoena, E-Mail to Don/John re Subpoena.	S.D.	150.00	.20	\$30.00
7/14/2021	Attention to E-Mails re NJDOE/Federal Funding, Attention to Files re Discovery cont., E-Mails w Saraya re Strunk Files.	S.D.	150.00	.20	\$30.00
7/14/2021	corresponded with Saraya re client email review	M.P.C.	300.00	.20	\$60.00
7/14/2021	Corresponded with John and clients re email production -4 emails	M.P.C.	300.00	.20	\$60.00
7/14/2021	E-Mails w Hogan/John re Class Action Discovery Production, E-Mails w Johanna/Hogan re .pst Files, Attention to Files re Discovery cont.	S.D.	150.00	1.40	\$210.00
7/14/2021	Research into monies spent on education law dispute resolution, call with Jordan and John re work for fluid damages and my role in helping Jordan.	S.S.	150.00	2.10	\$315.00
7/14/2021	Calls with Mary Hogan re production of documents. storage and transfer, Bates Stamping, marking confidential, emails with John/Sean re production, OAL spreadsheet work in putting in new decisions, creating of table with Bates numbers used and next numbers to be claimed as well as representing what has been produced for each plaintiff.	S.S.	150.00	2.90	\$435.00
7/14/2021	Preparation for discovery CMC next week.	J.D.R.	690.00	2.40	\$1,656.00
7/14/2021	Further attention to discovery issues; document collection and production.	J.D.R.	690.00	2.50	\$1,725.00

7/15/2021	Follow-up E-Mail to John/Don re Judge Bass Subpoena.	S.D.	150.00	.10	\$15.00
7/15/2021	Attention to email from JD re sources of law for reference in 45 day fluid damages context.	S.S.	150.00	.10	\$15.00
7/15/2021	email with Sean re discovery	M.P.C.	300.00	.10	\$30.00
7/15/2021	E-Mails w Johanna re Discovery Production Status.	S.D.	150.00	.20	\$30.00
7/15/2021	E-Mails w Matthew re .pst Files Issues cont.	S.D.	150.00	.20	\$30.00
7/15/2021	E-Mails w Matthew/Johanna re Discovery Production.	S.D.	150.00	.20	\$30.00
7/15/2021	Call back to Saraya re Discovery Issues/Redaction.	S.D.	150.00	.20	\$30.00
7/15/2021	Adding Mary Hogan to Discovery Folder on Sharepoint.	S.D.	150.00	.20	\$30.00
7/15/2021	Call w Saraya re Discovery Status.	S.D.	150.00	.30	\$45.00
7/15/2021	email and call with John re drafting of counsel affirmation for of counsel discovery review	M.P.C.	300.00	.20	\$60.00
7/15/2021	Gathering Paredes .pst Files cont., E-Mails w Matthew re Discovery Status cont., E-Mails w Johanna re Paredes.	S.D.	150.00	.60	\$90.00
7/15/2021	Corresponded with Saraya via email and phone re client email production	M.P.C.	300.00	.30	\$90.00

7/15/2021	Attention to Files re Discovery cont., Converting Paredes Attorney E-Mails to .pst for Production/Uploading, E-Mails w Johanna/Matthew re Discovery Production Issues, Working on Granting Hogan Access to Sharepoint Discovery Files, Gathering Discovery Files cont.	S.D.	150.00	.70	\$105.00
7/15/2021	Conversations with Matt Crimmel on his plaintiffs and what needs to be produced, working with Osborn documents, and redaction. Call with Johanna re her plaintiffs, emails and phone calls with Mary Hogan on production status, culling Osborn documents from SharePoint. Call with SD re pst files, worked with Haile-Selassie PST file and did redaction of some of the documents.	S.S.	150.00	3.40	\$510.00
7/15/2021	reviewed Haile-Selassie emails for production to state	M.P.C.	300.00	2.00	\$600.00
7/15/2021	Attention to managing document collection plaintiffs emails.	J.D.R.	690.00	1.60	\$1,104.00
7/16/2021	Call with J. Rue and S. Sikora re: document production and depositions	D.S.	550.00	.30	\$165.00
7/16/2021	Meeting at John's house with Don on conference call re production of documents and where we stand with each plaintiff.	S.S.	150.00	1.30	\$195.00
7/16/2021	Communicating with Lisa Quartarolo re Strunk production, prepping Strunk documents for production, uploading to SharePoint, communicating with Mary Hogan, emails with Johanna re her plaintiffs.	S.S.	150.00	1.60	\$240.00
7/16/2021	Stamping and marking confidential the documents for Osborn production, communication with Mary Hogan re Osborn production documents. Culling documents and moving locations for greater organization.	S.S.	150.00	2.00	\$300.00
7/16/2021	Continued addition of confidential stamps and Bates numbers to Osborn documents, continued organization of SharePoint site.	S.S.	150.00	2.30	\$345.00

7/16/2021	Attention to collection and review of Plaintiff (Strunk) documents for supplemental production; TC with paralegal re: same	L.Q.	500.00	1.20	\$600.00
7/16/2021	Further attention to supervision of document production. Email and telephone communications related to same.	J.D.R.	690.00	3.50	\$2,415.00
7/19/2021	Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.30	\$45.00
7/19/2021	Working on discovery production, getting documents together, zipping/unzipping properly, liaising with attorneys, Mary Hogan from Walsh law firm.	S.S.	150.00	2.50	\$375.00
7/19/2021	Attention to emails, Bates numbering Osborn documents, confidential stamping, re-naming of files with Bates numbers, coordinating with Mary Hogan, work on obtaining Gilliam document of interest from deficiency letter.	S.S.	150.00	4.50	\$675.00
7/19/2021	Attention to ongoing discovery issues; legal research re same.	J.D.R.	690.00	2.50	\$1,725.00
7/20/2021	Follow-up E-Mail re Subpoena on Judge Bass.	S.D.	150.00	.10	\$15.00
7/20/2021	Call from Saraya re Discovery Production.	S.D.	150.00	.10	\$15.00
7/20/2021	E-Mails w Johanna re Discovery Documents.	S.D.	150.00	.10	\$15.00
7/20/2021	Review/respond to email from co-counsel	D.S.	550.00	.10	\$55.00
7/20/2021	Meeting w Johanna re Discovery Production/E-Mails for Production.	S.D.	150.00	.50	\$75.00

7/20/2021	Attention to service issues related to Bass Subpoena	D.S.	550.00	.20	\$110.00
7/20/2021	Draft email to co-counsel re: Bass Subpoena	D.S.	550.00	.20	\$110.00
7/20/2021	document production-Paredes emails	J.B.	400.00	.50	\$200.00
7/20/2021	Coordinating with Mary and Johanna for Peredes documents, adding and tracking Bates numbers where necessary, loading onto imanageshare platform, reading deficiency letter for any pertaining to Sweeten, call with Don re working with pst files.	S.S.	150.00	2.10	\$315.00
7/20/2021	Review Gilliam docs re: Deficiency Letter; confer with S. Sikora re: same	D.S.	550.00	.70	\$385.00
7/20/2021	document production-reviewed Paredes emails	J.B.	400.00	1.00	\$400.00
7/20/2021	Attention to emails and drafting related to R45 discovery	J.D.R.	690.00	1.60	\$1,104.00
7/20/2021	Review Brown-Crandol production set for privilege	D.S.	550.00	2.30	\$1,265.00
7/21/2021	Review/Format/Upload Docket Entry re Minute Entry, E-Mails w John/Don re Subpoena Service on Judge Bass.	S.D.	150.00	.10	\$15.00
7/21/2021	E-Mails re Subpoena on Judge Bass, Preparing Service Request to Guaranteed Subpoena, E-Mail from John re Service.	S.D.	150.00	.10	\$15.00
7/21/2021	Review/Format/Upload Docket Entries re Motion to Compel, Fwd to John.	S.D.	150.00	.20	\$30.00

7/21/2021	Research on cy pres and types of Federal class actions.	S.S.	150.00	.30	\$45.00
7/21/2021	Zoom Meeting w Counsel re Case Status/Discovery/Strategy.	S.D.	150.00	.90	\$135.00
7/21/2021	Getting up to speed on where we are with production re each plaintiff, zipping files to prep for them to go out. Call with Mary Hogan re production. Post-mortem call with Don, Sean, John, and Tom O'Leary (discussion of summary judgment, plaintiffs and production), call with Johanna re pst files, read motion to compel sent by Mary Hogan.	S.S.	150.00	2.60	\$390.00
7/21/2021	document production-Paredes emails	J.B.	400.00	.50	\$200.00
7/21/2021	document production-Paredes emails	J.B.	400.00	.50	\$200.00
7/21/2021	Team call as follow-up to conference and plan for moving forward	D.S.	550.00	.70	\$385.00
7/21/2021	Participate in CMC	J.D.R.	690.00	.80	\$552.00
7/21/2021	Prepare for status call with Court; appear for status call with Judge Williams; follow-up email re: same	D.S.	550.00	1.20	\$660.00
7/21/2021	document production-reviewed Paredes emails	J.B.	400.00	2.50	\$1,000.00
7/21/2021	Prepare for CMC.	J.D.R.	690.00	2.80	\$1,932.00
7/22/2021	Review/Format/Upload Docket Notice Scheduling Motion to Compel, Updating Calendar/Case Tracking, Attention to John's E-Mail re Fwd Letter to All Counsel, E-Mail to All	S.D.	150.00	.30	\$45.00



## Appearing Counsel re John's Letter.

7/22/2021	Draft follow-up email re: reconvening meet-and-confer	D.S.	550.00	.10	\$55.00
7/22/2021	Attention to court filings and correspondence to opposing counsel	L.Q.	500.00	.20	\$100.00
7/22/2021	Stamping Gilliam letter, call to Mary Hogan re Gilliam and Paredes, putting documents on imanageshare for Mary, emails and calls with/to Lisa Quartarolo re Strunk production, Zoom call with Johanna re Paredes, phone call to Johanna, left message.	S.S.	150.00	1.20	\$180.00
7/22/2021	document production-Paredes emails	J.B.	400.00	.50	\$200.00
7/22/2021	Pre-conference call with J. Rue to prepare for call; reconvened meet-and-confer call; follow-up re: same	D.S.	550.00	.60	\$330.00
7/22/2021	Prepare for meet and confer conference call; participate in meet and confer	D.S.	550.00	.80	\$440.00
7/22/2021	document production-reviewed Paredes emails	J.B.	400.00	1.00	\$400.00
7/22/2021	Drafted affirmation of due diligence for of counsel reviewing discovery production	M.P.C.	300.00	1.50	\$450.00
7/22/2021	Attend to strategy for discovery issues; draft/review/revise proposed letter to court; revise draft letter to incorporate adversary's similar letter	D.S.	550.00	2.40	\$1,320.00
7/22/2021	Preparation for meet and confer; participation in meet and confer (2 calls); follow-up to same; drafting letter to USMJ Williams; discovery strategy and planning.	J.D.R.	690.00	6.50	\$4,485.00

7/23/2021	Review email traffic re: deposition scheduling	D.S.	550.00	.10	\$55.00
7/23/2021	email correspondence with Saraya re discovery completion	M.P.C.	300.00	.20	\$60.00
7/23/2021	Reading Corley case re class certification, research into secondary sources with discussions of class certification and types of class actions to be brought.	S.S.	150.00	.80	\$120.00
7/23/2021	Call to confirm status of client document productions	D.S.	550.00	.30	\$165.00
7/23/2021	document production-Paredes emails	J.B.	400.00	.50	\$200.00
7/23/2021	document production-reviewed Brown-Crandol emails	J.B.	400.00	.50	\$200.00
7/23/2021	Attention to collection and review of plaintiff (Strunk) documents; scheduling order from court; correspondence with NJDOE counsel regarding deposition schedule;	L.Q.	500.00	.80	\$400.00
7/23/2021	Attend to strategy for deposition scheduling and planning	D.S.	550.00	1.00	\$550.00
7/23/2021	Zoom with John and Don re production of Brown-Crandol documents. Checking for duplicates in Strunk and moving files where they need to go, call with LMQ re her review of Strunk documents. Call with Mary Hogan re Strunk documents, calling Johanna re her plaintiffs, culling Strunk documents for Lisa.	S.S.	150.00	4.20	\$630.00
7/25/2021	Conference call re discovery and potential depositions.	S.S.	150.00	1.00	\$150.00
7/25/2021	Attention to team conference call re: discovery disputes and deposition schedule in preparation for end of discovery; review and redaction of Plaintiffs (Strunk) correspondence with school district	L.Q.	500.00	1.30	\$650.00

7/25/2021	Zoom call with team to discuss discovery issues and strategy related to addressing same; finalize/file letter o behalf of J. Rue	D.S.	550.00	1.30	\$715.00
7/25/2021	Further attention to discovery disputes; review draft motions; legal research re same; strategy and planning for coming week of depositions.	J.D.R.	690.00	6.50	\$4,485.00
7/26/2021	Attention to follow-up correspondence re: discovery issues	L.Q.	500.00	.10	\$50.00
7/26/2021	Review/Format/Upload Docket Entries/Text Orders re Correspondence/Pre-Trial Schedule/Status Teleconference, Fwd to John, Updating Calendar/Case Tracking, Downloading Docket Report, Updating Google Drive Documents.	S.D.	150.00	.60	\$90.00
7/26/2021	Call with J. Rue re: filings and upcoming status conference with Judge Williams	D.S.	550.00	.20	\$110.00
7/26/2021	Confer with S. Sikora re: defendants' document productions and application of "attorney-client" privilege to an advocate	D.S.	550.00	.30	\$165.00
7/26/2021	Research into case law and secondary sources on Lexis, attention to Federal Rules of Civil procedure and Principles of Aggregate Litigation.	S.S.	150.00	1.10	\$165.00
7/26/2021	Team meeting to prepare for call with Judge Williams	D.S.	550.00	.50	\$275.00
7/26/2021	Call with LMQ re Strunk document production, call with DS re Brown-Crandol emails, call with Mary Hogan re msg issue with Brown-Crandol files, Bates numbering of Strunk documents that LMQ had reviewed.	S.S.	150.00	2.00	\$300.00
7/26/2021	Participate in Discovery Conference with Judge Williams	D.S.	550.00	.70	\$385.00
7/26/2021	Further attention to discovery strategy and planning (gathering witness availability); consultation with co-counsel re Bass deposition prep; CMC with Judge Williams; preparation for and follow-up to same.	J.D.R.	690.00	6.30	\$4,347.00

7/27/2021	E-Mail from Don re Trial Date, Updating Calendar/Case Tracking.	S.D.	150.00	.10	\$15.00
7/27/2021	Attention to Jordan Dascal's email re sections of the aggregation principles book to pull, and emailed same to him.	S.S.	150.00	.20	\$30.00
7/27/2021	Review/Format/Upload Class Action Docket Entries re Amended Scheduling Order/Minute Entry, Fwd to John, Updating Calendar/Case Tracking, E-Mail to Don re Trial Date.	S.D.	150.00	.30	\$45.00
7/27/2021	E-Mails from John re Deposition Schedules, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
7/27/2021	Call with Mary Hogan re Brown-Crandol emails, pdfing docs and stamping. Look at what docs we got from Defendant during Discovery (got docs from Walsh law firm), call to Mary Hogan re depositions.	S.S.	150.00	.40	\$60.00
7/27/2021	Attention to deposition preparation (Bass, Sanders), scheduling (CP, DO, HYS, MS), arranging attorney coverage; legal research re scope of deposition topics in individual dep.	J.D.R.	690.00	7.50	\$5,175.00
7/28/2021	Follow up on discovery collection and provide guidance re: same	D.S.	550.00	.20	\$110.00
7/28/2021	Download and saving files from Walsh file platform that cover all of what defendants have produced to us. Call with DS re discovery, complete production from defendants, uploading docs to our SharePoint.	S.S.	150.00	1.30	\$195.00
7/28/2021	Further attention to discovery strategy and planning; preparation for Bass deposition; preliminary preparation for DO deposition.	J.D.R.	690.00	5.80	\$4,002.00
7/29/2021	Handling ALJ Sanders depo docs for DS, emails with DS re same.	S.S.	150.00	.20	\$30.00
7/29/2021	Draft email to D. Osborn re: deposition	D.S.	550.00	.30	\$165.00

7/29/2021	Email re: witness scheduling	D.S.	550.00	.40	\$220.00
7/29/2021	Confer with J. Rue re: information obtained at depositions and overall strategy for pursuing trial and settlement	D.S.	550.00	.50	\$275.00
7/29/2021	Prepare for team call; team call to discuss deposition planning, preparation and protocol	D.S.	550.00	.60	\$330.00
7/29/2021	Reading and summarizing cases dealing with cy pres awards and class actions found on Lexis.	S.S.	150.00	2.80	\$420.00
7/29/2021	Attention to various emails re discovery confidentiality; plaintiff team call; DO deposition prep	J.D.R.	690.00	2.50	\$1,725.00
7/30/2021	Pre-deposition call with D. Dwyer	D.S.	550.00	.10	\$55.00
7/30/2021	Finalize summary email and send same	D.S.	550.00	.20	\$110.00
7/30/2021	Attention to court filings; deposition debrief	L.Q.	500.00	.30	\$150.00
7/30/2021	Attn to call from Tom O'Leary, work on Osborn Notice of petition for cert, Osborn petition for cert calendaring.	S.S.	150.00	1.00	\$150.00
7/30/2021	Phone call and emails re: deposition scheduling	D.S.	550.00	.30	\$165.00
7/30/2021	Review of LMQ archives for 2018 NJSEP report background information and documents re: 45 day rule for discovery production	L.Q.	500.00	.40	\$200.00
7/30/2021	Attn to case law from Lexis re cy pres and class action and summary write up.	S.S.	150.00	1.60	\$240.00

7/30/2021	Further attention to deposition schedule and necessary changes.	J.D.R.	690.00	1.20	\$828.00
7/30/2021	Attend deposition of John Worthington; interim conferences with co-counsel during breaks; follow-up call following deposition; prepare summary of highlights of the deposition	D.S.	550.00	4.90	\$2,695.00
7/31/2021	Conference call re discovery with John, Don, Tom, and others. Taking notes and emailing out notes.	S.S.	150.00	.50	\$75.00
8/1/2021	Conference call with team re; deposition preparation	D.S.	550.00	.40	\$220.00
8/1/2021	Conference with J. Rue re: issue proper scope of remedy given the almost certain liability of state; Research re: same; Draft memorandum to J. Rue re: same	A.E.F.	200.00	4.00	\$800.00
8/2/2021	Review/Format/Upload Docket Entry re Letter from O'Leary encl. Consent Order.	S.D.	150.00	.10	\$15.00
8/2/2021	Review/Format/Upload Docket Entries re Attorney Correspondence re Discovery Issues/Conference Call, Fwd to John, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.30	\$45.00
8/2/2021	Summarizing cases re cy pres and class action from Lexis.	S.S.	150.00	.50	\$75.00
8/2/2021	Pulling settlement/adjournment comms for Osborn, work on Strunk production, meeting with MS re depo preparation, pulling Strunk records re tuition reimbursement, check production docs for OCR.	S.S.	150.00	1.70	\$255.00
8/2/2021	Attention to pre-deposition discovery issues (D.O. and C.P.)	K.H.	550.00	2.50	\$1,375.00
8/3/2021	Research impeachment of witness based on prior acts	D.S.	550.00	.30	\$165.00

8/3/2021	Class Action production gathering (complaint against celentano and mandamus action, petition for DP, section of 2nd amended complaint, rog responses, etc.), renaming docs by Bates #, Bates stamping, confidential stamping	S.S.	150.00	1.70	\$255.00
8/3/2021	Gathering depo prep documents for all plaintiffs.	S.S.	150.00	2.10	\$315.00
8/3/2021	Research objections and limiting motions under Rule 30	D.S.	550.00	1.20	\$660.00
8/3/2021	Attention to pre-deposition discovery issues (D.O. and C.P.)	K.H.	550.00	1.80	\$990.00
8/3/2021	Prepare for witness prep meeting of EP	D.S.	550.00	2.00	\$1,100.00
8/3/2021	Meeting with plaintiff E.P. to prepare for deposition	D.S.	550.00	2.80	\$1,540.00
8/4/2021	Review/Format/Upload Docket Entry re NJDOE Third Party Litigation Funding Statement, Fwd to john.	S.D.	150.00	.10	\$15.00
8/4/2021	Review/Format/Upload Docket Entries re Third Party Litigation Funding Corrections, Fwd to John.	S.D.	150.00	.20	\$30.00
8/4/2021	Gathering Correspondence for Discovery Production cont.	S.D.	150.00	.20	\$30.00
8/4/2021	Gathering Production Files cont.	S.D.	150.00	.30	\$45.00
8/4/2021	corresponded with Saraya re Osborn emails for discovery	M.P.C.	300.00	.20	\$60.00

8/4/2021	Working on Discovery Production cont., Editing Draft Letter to Soranno, Sending to John/Krista, Gathering E-Mails for Production cont.	S.D.	150.00	.40	\$60.00
8/4/2021	Gathering Discovery Production Documents cont., Finalizing Haley Letter to Soranno, Returning to Krista, Gathering Documents cont.	S.D.	150.00	.40	\$60.00
8/4/2021	Calls from John re D.O. Documents for Production, Gathering Documents for Production cont., Review/Format/Upload J.A. Docket Entry re NJDOE Third Party Litigation Funding Statement, Gathering D.O. Discovery Documents cont.	S.D.	150.00	.60	\$90.00
8/4/2021	Conversed with John and Saraya re Osborn discovery review	M.P.C.	300.00	.30	\$90.00
8/4/2021	Call/Zoom Meeting w John re Discovery, Gathering Record on Appeal for D.O. Student Records Matter, Sending to John, Checking Status re E-Mail Production, Working on Gathering Attorney Correspondence cont.	S.D.	150.00	.70	\$105.00
8/4/2021	Gathering Correspondence for Discovery cont.	S.D.	150.00	1.00	\$150.00
8/4/2021	Finish gathering Osborne documents and Brown-Crandol depo prep docs, sent John local versions of docs in Osborne.	S.S.	150.00	1.20	\$180.00
8/4/2021	Call with Matt Crimmel re folders for Osborn production docs, call with John re instructions and carrying out of same re sending local files to John/Krista.	S.S.	150.00	1.30	\$195.00
8/4/2021	Attn to discovery production, phone call with JR re same, discussion of Osborn docs, consensual adjournments, file locations, gathering of relevant documents, see if state produced relevant Osborn records.	S.S.	150.00	1.60	\$240.00
8/4/2021	Attn to Osborne records, Bates naming files, gathering relevant files.	S.S.	150.00	1.70	\$255.00
8/4/2021	Telephone conference with J. Rue and K. Haley re: issues to address in witness preparation for D.O.; zoom conference re: same	D.S.	550.00	.60	\$330.00



8/4/2021	Prepare for witness prep meeting of YHS	D.S.	550.00	1.50	\$825.00
8/4/2021	Review of documents relative to supplemental D.O. production	K.H.	550.00	2.30	\$1,265.00
8/4/2021	Witness Prep with Y.H.S.	D.S.	550.00	3.50	\$1,925.00
8/4/2021	Attention to prep for DO deposition.	J.D.R.	690.00	4.30	\$2,967.00
8/4/2021	Attention to prep for YHS deposition.	J.D.R.	690.00	4.50	\$3,105.00
8/5/2021	Gathering Discovery Production Documents cont.	S.D.	150.00	.10	\$15.00
8/5/2021	E-Mail to Saraya re Discovery Production Assignment.	S.D.	150.00	.10	\$15.00
8/5/2021	Gathering Discovery Production Documents cont.	S.D.	150.00	.20	\$30.00
8/5/2021	E-Mail to Matthew/John re E-Mails for Production, Gathering E-Mails cont., Gathering Documents for Discovery Production.	S.D.	150.00	.20	\$30.00
8/5/2021	Review/respond to email from client Y.H.S.	D.S.	550.00	.10	\$55.00
8/5/2021	Internal email re: deposition start time	D.S.	550.00	.10	\$55.00
8/5/2021	Gathering Documents for Discovery Production cont.	S.D.	150.00	.40	\$60.00

8/5/2021	Gathering Documents for Discovery Production cont.	S.D.	150.00	.80	\$120.00
8/5/2021	Research and summarizing cy pres/class action cases (Byrd's v. Aarons and others)	S.S.	150.00	1.50	\$225.00
8/5/2021	Attention to preparation for MS deposition; TC with JR and KH re: same	L.Q.	500.00	1.00	\$500.00
8/5/2021	Strunk settlement docs culling, OAL decisions analysis assignment and corresponding spreadsheet- looking for delays, call from MC re zip and pst files, depo OAL research.	S.S.	150.00	3.30	\$495.00
8/5/2021	Reviewed Osborn supplemental discovery, emails between John and district counsel	M.P.C.	300.00	3.00	\$900.00
8/5/2021	Defend afternoon session of deposition of E.P.; follow-up meeting with client and co-counsel; draft summary email to team	D.S.	550.00	2.30	\$1,265.00
8/5/2021	Review of documents in preparation for M.S. deposition; Telephone calls/zoom/email with client	K.H.	550.00	5.30	\$2,915.00
8/5/2021	Download/briefly review deposition exhibits; defend deposition of E.P. (Morning/early afternoon session), including follow-up calls with client and co-counsel	D.S.	550.00	4.40	\$2,420.00
8/5/2021	Deposition prep (strunk); deposition prep (rota).	J.D.R.	690.00	4.50	\$3,105.00
8/6/2021	Attn to culling documents from inboxes (Haley, Scanlon, Cummins) that fit certain criteria, zip them as appropriate and put on sharepoint for John.	S.S.	150.00	1.60	\$240.00
8/6/2021	Osborn student records culling documents from Outlook inboxes based on date criteria.	S.S.	150.00	1.90	\$285.00
8/6/2021	M.S. deposition and follow up to same	K.H.	550.00	6.50	\$3,575.00

8/6/2021	Attendance at MS deposition via Zoom	L.Q.	500.00	5.00	\$2,500.00
8/6/2021	Attention to prep for DO deposition; review of documents re same; emails with adversary re same.	J.D.R.	690.00	4.50	\$3,105.00
8/6/2021	Prep for Rota deposition; attendance at same; follow-up to same.	J.D.R.	690.00	10.30	\$7,107.00
8/7/2021	Read emails from John re supplemental discovery	M.P.C.	300.00	.30	\$90.00
8/7/2021	Attention to communication re: settlement	L.Q.	500.00	.20	\$100.00
8/7/2021	Osborn production work and Haile-Selassie production work.	S.S.	150.00	1.30	\$195.00
8/7/2021	Settlement communication.	J.D.R.	690.00	.50	\$345.00
8/7/2021	Further attention to review and production of supplemental DO production; attention to review of YHS production and files; attention to review of CP production and files.	J.D.R.	690.00	7.50	\$5,175.00
8/9/2021	Emails re: EP Deposition	D.S.	550.00	.10	\$55.00
8/9/2021	Telephone conference re: updating discovery	D.S.	550.00	.30	\$165.00
8/9/2021	Attention to previous filed complaints and possible new witness for plaintiffs.	L.Q.	500.00	.40	\$200.00
8/9/2021	Research on Dr. John Marciante, HS supplemental production, attn to Osborn notice of petition, call from John re Marciante letter, zoom call with Don re Osborn filing.	S.S.	150.00	1.40	\$210.00

8/9/2021	Conference with J. Rue re: depositions of Carolyn Marano and Candice Hendricks; Research issues re: same; Draft rule 45 Subpoenas for same; Review and respond to multiple emails re: same	A.E.F.	200.00	1.40	\$280.00
8/9/2021	Osborn letter work on and send to KAG and John McCarthy, attn to Marciante letter, culling Osborn documents.	S.S.	150.00	2.10	\$315.00
8/9/2021	Further preparation for DO deposition; further preparation for HYS deposition; preparation for CP deposition; attention to noticing additional Rule 45 depositions.	J.D.R.	690.00	6.60	\$4,554.00
8/10/2021	Attention to State's in opposition to discovery	L.Q.	500.00	.50	\$250.00
8/10/2021	Gathering Mandamus/Cenlentano docs for Paredes, Bates stamping and Bates stamp naming documents.	S.S.	150.00	1.70	\$255.00
8/10/2021	Team call to discuss outcome of 30(b)(6) deposition of NJDOE and follow-up action required	D.S.	550.00	.80	\$440.00
8/10/2021	Review Haile-Salesi documents	D.S.	550.00	1.00	\$550.00
8/10/2021	[Haile-Selassie] Complete document review; draft internal email re: additional doc to be disclosed; brief online research re: addresses for deponents and emails re: same	D.S.	550.00	2.00	\$1,100.00
8/10/2021	Attendance at NJDOE 30b6 deposition; preparation for and follow-up to same; drafting letter to Judge Williams re discovery dispute; preparation for OAL 30b6 deposition; further attention to document collection and production.	J.D.R.	690.00	9.50	\$6,555.00
8/11/2021	Conference with J. Rue re: citations for letter to Court	D.S.	550.00	.10	\$55.00
8/11/2021	Brief check-in with client YHS about upcoming deposition	D.S.	550.00	.10	\$55.00

8/11/2021	OAL Decision spreadsheet, going through decisions from 2021, 2020, and 2019 finding delays and detailing in spreadsheet, color coding re same.	S.S.	150.00	2.30	\$345.00
8/11/2021	Review/revise draft letter to court	D.S.	550.00	.80	\$440.00
8/11/2021	Continued work on OAL Decision spreadsheet, tracking decisions from 2019, 2020, and 2021 and finding delays.	S.S.	150.00	2.60	\$390.00
8/11/2021	Attention to and analysis of documents and information obtained from NJDOE re current practices.	J.D.R.	690.00	1.50	\$1,035.00
8/11/2021	Assistance in prep for YHS deposition.	J.D.R.	690.00	1.80	\$1,242.00
8/11/2021	Further attention to research re discovery rules; attention to drafting letter to Judge Williams.	J.D.R.	690.00	2.50	\$1,725.00
8/12/2021	Attn to OAL Decisions, using information from spreadsheet to mark actual decisions for the delays, Paredes Mandamus/Celentano Bates number naming documents, producing docs to imanageshare, discussion of index to documents, estimation of time to create same.	S.S.	150.00	3.10	\$465.00
8/12/2021	Attention to details of obtaining additional depositions from OAL and NJDOE former employee.	J.D.R.	690.00	1.50	\$1,035.00
8/12/2021	Attention to documentation of recent delays in the OAL.	J.D.R.	690.00	1.80	\$1,242.00
8/12/2021	Final preparation to defend deposition of Y.H.S.; appear for Y.H.S. deposition; follow-up re: same	D.S.	550.00	8.40	\$4,620.00
8/13/2021	Call with JR re indexing discovery documents, starting to index documents for Paredes and Osborn, call with Don and John re same.	S.S.	150.00	1.40	\$210.00

8/13/2021	Case law research and summaries (City Select v. BMW, Majdipour v. Jaguar Land Rover N. AM, Grrifin v. Zager)	S.S.	150.00	1.50	\$225.00
8/13/2021	Attention to reply to opposition to MTC	J.D.R.	690.00	1.60	\$1,104.00
8/13/2021	Attention to OAL 30b6 deposition; consultation with co-counsel re same.	J.D.R.	690.00	5.50	\$3,795.00
8/14/2021	Attention to planning and prep for DO deposition.	J.D.R.	690.00	.40	\$276.00
8/15/2021	Creating index for Osborn discovery documents (from documents produced in July).	S.S.	150.00	2.70	\$405.00
8/16/2021	Attention to Receipt of Deposition Notices, E-Mail to Don.	S.D.	150.00	.10	\$15.00
8/16/2021	Attn to email from Jordan Dascal re cy pres, fluid damages, and a class action	S.S.	150.00	.10	\$15.00
8/16/2021	Attention to ALJ Sanders transcript	L.Q.	500.00	.70	\$350.00
8/16/2021	Osborn class action indexing over 600 documents from July production.	S.S.	150.00	4.00	\$600.00
8/16/2021	Meeting with Dr. John Marciante; preparation and follow-up to same.	J.D.R.	690.00	3.50	\$2,415.00
8/17/2021	Downloading Docket Report, Updating Files on Google Drive.	S.D.	150.00	.10	\$15.00
8/17/2021	Attention to Receipt of UPS Shipment re Deposition Transcript, Scanning Invoice/Sending to Beth, Scan/Review/Format/Upload Transcript, Filing	S.D.	150.00	.50	\$75.00

Paper Copy, Sending to Don/John.

8/17/2021	Updating Calendar/Case Tracking re Order to Release Records, Review/Format/Upload Transcript re Ehling Deposition.	S.D.	150.00	.50	\$75.00
8/17/2021	Creating index of Osborn newly produced documents (over 700 documents in total).	S.S.	150.00	3.00	\$450.00
8/17/2021	Review of and response to communication with AG's office re confidentiality of deposition transcripts re Sanders and Bass.	J.D.R.	690.00	.70	\$483.00
8/17/2021	Creating index for over 700 Osborn documents.	S.S.	150.00	3.60	\$540.00
8/17/2021	Review C.P file; zoom meeting with client for deposition preparation	K.H.	550.00	2.30	\$1,265.00
8/17/2021	Prepare for deposition prep with D.O.; D.O. Deposition Prep	D.S.	550.00	5.00	\$2,750.00
8/18/2021	Scan/Review/Format/Upload Paper Transmittal of D.O. Deposition Notice, Filing Paper Copies.	S.D.	150.00	.10	\$15.00
8/18/2021	Attention to witness and discovery issues and strategy	K.H.	550.00	.70	\$385.00
8/18/2021	Indexing Osborn and Paredes documents (>800 documents total)	S.S.	150.00	4.20	\$630.00
8/18/2021	Attention to discovery issues; strategy re PTO	J.D.R.	690.00	1.30	\$897.00
8/19/2021	Call from Beth re Billing for Fee Application.	S.D.	150.00	.10	\$15.00

8/19/2021	Updating Staff Billing Rates cont.	S.D.	150.00	.10	\$15.00
8/19/2021	Updating Staff Billing Rates to Current for Fee Application.	S.D.	150.00	.60	\$90.00
8/19/2021	Updating Staff Billing Rates to Current cont.	S.D.	150.00	.60	\$90.00
8/19/2021	Indexing Paredes documents, send findings to JR, KHR, and DS, attn to email from DS re indexes.	S.S.	150.00	1.80	\$270.00
8/19/2021	Attention to transcripts of Defendant NJDOE personnel depositions	L.Q.	500.00	.90	\$450.00
8/19/2021	Review file in preparation for deposition; attention to scheduling notices; emails and discussions with client re deposition preparation and issues	K.H.	550.00	3.70	\$2,035.00
8/19/2021	Attention to discovery strategy and planning; drafting letter to Judge Williams; correspondence with co-counsel; drafting letter to DAG Seranno; legal research re discovery issues;	J.D.R.	690.00	4.50	\$3,105.00
8/19/2021	Final preparation to defend deposition of D.O., including emails with adversary re: deposition exhibits; appear for D.O. deposition	D.S.	550.00	8.00	\$4,400.00
8/19/2021	Prep for C.P. deposition	K.H.R.	550.00	4.00	\$2,200.00
8/20/2021	Filing CP deposition exhibits for Krista.	S.S.	150.00	.20	\$30.00
8/20/2021	C.P. deposition and follow up to same	K.H.R.	550.00	7.50	\$4,125.00



8/21/2021	Indexing produced docs for SBC, 27/54 docs completed.	S.S.	150.00	.50	\$75.00
8/23/2021	Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.10	\$15.00
8/23/2021	Review/Format/Upload Docket Notice re Amended Trial Notice, Updating Calendar/Case Tracking/Trial Calendar.	S.D.	150.00	.20	\$30.00
8/23/2021	Meeting re Billing Rate Updates for Fee Application.	S.D.	150.00	.40	\$60.00
8/23/2021	Call to Beth re Billing Rates, Updating Billing Rates for Fee Application.	S.D.	150.00	.50	\$75.00
8/23/2021	Index of Brown-Crandol documents, Haile-Selassie index, work on HS depo exhibits, upload Marvin docs to sharepoint, attn to email re witnesses (Fienberg and McGuire), work on letter to add witnesses (supplemental amendment to answers), finding answers to interrogatories.	S.S.	150.00	1.90	\$285.00
8/23/2021	Team strategy/planning call and follow-up	D.S.	550.00	1.30	\$715.00
8/23/2021	Attention to case management, esp. billing records.	J.D.R.	690.00	2.20	\$1,518.00
8/23/2021	Attention to amendment of discovery responses; communications with potential witnesses; legal research re in limine motions; team meeting.	J.D.R.	690.00	4.50	\$3,105.00
8/24/2021	Call from Walsh Law Firm for John, Call/E-Mail to John.	S.D.	150.00	.10	\$15.00
8/24/2021	Review/Format/Upload Docket Entry re Rue Letter to Court re Discovery Issues, Fwd to John.	S.D.	150.00	.10	\$15.00

8/24/2021	Attention to Receipt of Paper Deposition Transcripts re Bass/Ehling Depositions, Filing Paper Copies.	S.D.	150.00	.30	\$45.00
8/24/2021	Updating Billing Rates cont., E-Mail to Beth.	S.D.	150.00	.40	\$60.00
8/24/2021	Team call re: potential additional parent witnesses	D.S.	550.00	.80	\$440.00
8/24/2021	Confer with J. Rue re; discovery letter to be submitted to court; review/comment on same; finalize and file same (filing protracted due to Court's website issues)	D.S.	550.00	1.10	\$605.00
8/24/2021	Letter to add witnesses and certifications (Fienberg and Moreira), Haile-Selassie index work, call with David, Catherine, John, Don re adding witnesses, filing subpoenas.	S.S.	150.00	3.70	\$555.00
8/24/2021	Attention to discovery dispute over "discovery timeframe;" further legal research re same; letter to USMJ Williams.	J.D.R.	690.00	3.30	\$2,277.00
8/24/2021	Preliminary attention to drafting renewed motion for class certification.	J.D.R.	690.00	2.50	\$1,725.00
8/24/2021	Attention to finalizing witness list; supplementing rog response; calls with attorneys for respective witnesses.	J.D.R.	690.00	3.80	\$2,622.00
8/25/2021	Pulling settlement agreements for JD.	S.S.	150.00	.40	\$60.00
8/25/2021	Review/Format/Upload Correspondence re NJDOE Subpoenas/Deposition Transcripts, Attention to Deposition Exhibits.	S.D.	150.00	.60	\$90.00
8/25/2021	Review/revise revised draft of letter to OAL's counsel	D.S.	550.00	.30	\$165.00
8/25/2021	Parent certs (for witnesses), Bates stamp issue work out with YHS documents, renaming Strunk documents, handling Walsh exhibits (Marvin and Milligan).	S.S.	150.00	3.20	\$480.00

8/25/2021	Review draft letter to OAL attorney re: over-designation of deposition transcripts; study Confidentiality Order; phone call with J. Rue re: Confidentiality Order and revisions to draft letter	D.S.	550.00	1.00	\$550.00
8/25/2021	Further attention to draft parent certifications; further attention to OAL letter	D.S.	550.00	1.00	\$550.00
8/25/2021	Attention to issues re confidentiality designations; correspondence with adversary re same	J.D.R.	690.00	.80	\$552.00
8/25/2021	Review draft of first parent certification; email to paralegal re: same	D.S.	550.00	1.40	\$770.00
8/25/2021	Review confidentiality order; review scheduling order; draft letter to DAG Fischera re designations.	J.D.R.	690.00	1.80	\$1,242.00
8/26/2021	Call from Valverde re Class Action, Calls to/from John.	S.D.	150.00	.10	\$15.00
8/26/2021	Calls/E-Mail from Saraya re D.F. Witness Documents, Setting up Account Access for Saraya.	S.D.	150.00	.10	\$15.00
8/26/2021	Call from Saraya re D.F. Documents.	S.D.	150.00	.10	\$15.00
8/26/2021	Scan/Review/Format/Upload Breck Letter to Court re Subpoenas/Depositions, Filing Paper Copies.	S.D.	150.00	.20	\$30.00
8/26/2021	Analyze documents from potential third-party witness; emails re: same	D.S.	550.00	.40	\$220.00
8/26/2021	Team zoom re: non-party witnesses	D.S.	550.00	.60	\$330.00
8/26/2021	Gilliam index, meet with Danielle Fienberg, go through her inbox to get relevant emails (Flaum and EPSNJ), work on marking confidential, communication with Matt Crimmel re Fienberg	S.S.	150.00	4.10	\$615.00

case, going through his inbox to create a relevant  
pst file.

8/26/2021	Further attention to confidentiality designations.	J.D.R.	690.00	2.20	\$1,518.00
8/26/2021	Attention to DF witness prep, discovery issues.	J.D.R.	690.00	3.30	\$2,277.00
8/27/2021	Review/respond to email from D.O. re: interrogatory responses	D.S.	550.00	.10	\$55.00
8/27/2021	Review letter from OAL re: confidentiality designations; confer re: same	D.S.	550.00	.20	\$110.00
8/27/2021	Prepare for confidentiality meet-and-confer with OAL; participate in brief meet-and-confer Zoom conference	D.S.	550.00	.80	\$440.00
8/27/2021	Attention to meet and confer; preparation for and follow-up to same	J.D.R.	690.00	1.10	\$759.00
8/27/2021	Attention to further document production re third party witnesses; conference with co-counsel re same.	J.D.R.	690.00	1.20	\$828.00
8/30/2021	Call from Dwyer for John, Call to John, Transfer Call to John.	S.D.	150.00	.10	\$15.00
8/30/2021	Downloading Docket Report cont., Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00
8/30/2021	Review/Format/Upload Text Order Rescheduling Conference, Fwd to John, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
8/30/2021	Review letter to court from R. Thurston	D.S.	550.00	.10	\$55.00

8/30/2021	Review/Format/Upload Text Order/Docket Entries re Discovery Issues/Witnesses/Oral Argument/Sorrano, Fwd to John, Updating Calendar/Case Tracking, Downloading Docket Report.	S.D.	150.00	.40	\$60.00
8/30/2021	Emails and phone calls re: Morano deposition	D.S.	550.00	.30	\$165.00
8/30/2021	Analyze deposition files; draft email to Court Reporter, ordering transcripts	D.S.	550.00	.50	\$275.00
8/30/2021	Email with Matt Crimmel re Fienberg, call from JR re depo transcripts and digest, call to Mary Hogan re depo digests, call Don re same, discussion with JR of Sweeten timeline, depo digest for Sweeten based on transcript.	S.S.	150.00	2.30	\$345.00
8/30/2021	Participate in weekly team meeting; follow-up meeting with	D.S.	550.00	.80	\$440.00
8/30/2021	Team call; preparation for and follow-up to same.	J.D.R.	690.00	1.70	\$1,173.00
8/30/2021	Attention to court correspondence; preparation for oral argument	J.D.R.	690.00	2.00	\$1,380.00
8/31/2021	Attention to remedy analysis	E.S.	200.00	.40	\$80.00
8/31/2021	Updating Billing Rates cont., E-Mail to Beth.	S.D.	150.00	.60	\$90.00
8/31/2021	Review email re: deposition transcripts; research file re: same	D.S.	550.00	.20	\$110.00
8/31/2021	Review/respond to email from court reporter, including related file research; draft email to co-counsel re: same	D.S.	550.00	.40	\$220.00

8/31/2021	Attention to correspondence re 3p discovery;	J.D.R.	690.00	.40	\$276.00
8/31/2021	Review letter from OAL's counsel; review recently produced documents and prepare deposition questions re: same	D.S.	550.00	1.50	\$825.00
8/31/2021	Work on Sweeten transcript digest, Sweeten timeline (color coding, table making, etc.), communications with John/Don re same.	S.S.	150.00	5.10	\$765.00
8/31/2021	Work on revisions to D.O. Interrogatory Responses	D.S.	550.00	4.50	\$2,475.00
9/1/2021	Call from Saraya re A.S. Timeline/Documents.	S.D.	150.00	.10	\$15.00
9/1/2021	Call from Saraya re Pltf. Contact.	S.D.	150.00	.10	\$15.00
9/1/2021	Zoom conference with J. Rue and S. Sikora re: current case issues, long-term planning for November 7 Trial date and various issues re: same; Multiple telephone conferences with S. Sikora re: same.	A.E.F.	200.00	1.00	\$200.00
9/1/2021	Zoom with John re CA transcript work, timeline work, Sweeten timeline.	S.S.	150.00	2.40	\$360.00
9/1/2021	Review and respond to multiple emails from email J. Rue, D. Sotar and S. Sikora re: Subpoena for Documents to USDOE for documents related to September 20-21, 2018 USDOE site visit of NJDOE re: NJ-DOE's dispute resolution system; Review pleadings and case documents re: same; Draft initial draft of Subpoena re: same; Multiple telephone conferences and email with S. Sikora re: same;	A.E.F.	200.00	2.00	\$400.00
9/1/2021	Team Zoom Conference to discuss impact of CP OTSC on class action case and first day of trial and future handling	D.S.	550.00	.90	\$495.00

9/1/2021	Call with John, AI re trial in NJ for class action, make list of contacts for class action plaintiffs, work on Sweeten timeline.	S.S.	150.00	3.60	\$540.00
9/1/2021	Work on revised interrogatory responses for D.O.	D.S.	550.00	2.60	\$1,430.00
9/1/2021	Finalize draft amended interrogatory responses; proofread same and forward to client for review	D.S.	550.00	2.70	\$1,485.00
9/2/2021	Call back to John re Service of Subpoena in DC Next Day.	S.D.	150.00	.10	\$15.00
9/2/2021	Call w Saraya re Subpoena Process Service, Call to Guaranteed Subpoena re Service of process, Call to Saraya re Guaranteed Subpoena Service Deadline.	S.D.	150.00	.10	\$15.00
9/2/2021	Review/Format/Upload Docket Entries re Letters re Deposition/Discovery Issues, Fwd to John.	S.D.	150.00	.20	\$30.00
9/2/2021	Attention to consent order to change caption.	J.D.R.	690.00	.30	\$207.00
9/2/2021	Review letters filed by adversary with the Court; brief research re: third party subpoenas and scheduling order deadlines	D.S.	550.00	.50	\$275.00
9/2/2021	Attention to deposition follow up; strategy assessment following court hearing	K.H.	550.00	.70	\$385.00
9/2/2021	Get briefed on what AI and I need to do to draft the Rule 45 Subpoena to the US DOE, work on subpoena, accompanying letter and attachments, communication with AI and John re same, communication with Process Server company in Washington DC.	S.S.	150.00	4.40	\$660.00
9/2/2021	Zoom Conference with J. Rue and S. Sikora re: Subpoena for Documents to USDOE for documents related to September 20-21, 2018 USDOE site visit of NJDOE re: NJ-DOE?s dispute resolution system; Review Second Amended Complaint re: same; Research re:	A.E.F.	200.00	5.00	\$1,000.00

9/2/2021	same; Review USDOE website re: contacts; Re: same; Multiple telephone conferences and email with S. Sikora re: same; Multiple telephone conferences with J. Rue and D. Soutar re: same; Review draft Suboena and draft exhibit to subpoena re: same; Draft additions and changes to same; Multiple telephone conferences and email with S. Sikora re: latest draft of summons and attachment and service of same on USDOE Review of counsel's correspondence to court; attention to strategy and tactics.	J.D.R.	690.00	2.50	\$1,725.00
9/2/2021	Prepare for discovery conference with Judge Williams; participate in discovery conference; follow-up team call	D.S.	550.00	3.50	\$1,925.00
9/2/2021	Attendance at discovery oral argument; preparation for and follow-up to same.	J.D.R.	690.00	5.30	\$3,657.00
9/3/2021	Draft internal emails with guidance on files	D.S.	550.00	.10	\$55.00
9/3/2021	File class action docs for Don, Strunk index, zoom with John on Sweeten timeline, work on Sweeten timeline, got YHS and DO docs for Catherine Reisman, start on Paredes timeline.	S.S.	150.00	2.10	\$315.00
9/3/2021	Review/analyze draft discovery letter; provide comments on strategy for same	D.S.	550.00	.80	\$440.00
9/7/2021	Scan/Review/Format/Upload Bruck Ltr. to Rue re Confidential Deposition Transcripts, Fwd to John/Don, Filing Paper Copy.	S.D.	150.00	.10	\$15.00
9/7/2021	Downloading Docket Report, Updating Google Drive Documents.	S.D.	150.00	.20	\$30.00
9/7/2021	Review/Format/Upload Docket Entries re Minute Entry/Order re Production of Documents/Depositions, Fwd to John, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00



9/7/2021	Review/Format/Upload Docket Entry re Hearing Transcript/Request for Redaction/Seal, Updating Calendar/Case Tracking, Reminder E-Mail to John/Don/Krista re Notice Deadline.	S.D.	150.00	.30	\$45.00
9/7/2021	Call with DS re timelines, work on Paredes timeline (review exhibits, creating table and timeline in PPT)	S.S.	150.00	2.20	\$330.00
9/8/2021	Review/Format/Upload Docket Notice re Minute Entry.	S.D.	150.00	.10	\$15.00
9/8/2021	Draft internal email re: retrieving adversary's documents	D.S.	550.00	.10	\$55.00
9/8/2021	Drafts email re: new deposition transcript (C. Morano) and hearing transcript	D.S.	550.00	.10	\$55.00
9/8/2021	File class action docs for DS, work on timelines (Paredes, Brown-Crandol, Gilliam, Haile-Selassie)- analyzing exhibits, creating excel tables, counting days between significant events, PPT timelines	S.S.	150.00	5.40	\$810.00
9/9/2021	Review/analyze email from S. Sikora; draft response to question in email; email re: document transfer company	D.S.	550.00	.40	\$220.00
9/9/2021	Attend to deposition exhibits, transcripts, etc.; emails re: same	D.S.	550.00	.80	\$440.00
9/9/2021	Attention to docket entries from mid-August to current; Ehling and Rota deposition transcripts	L.Q.	500.00	1.30	\$650.00
9/9/2021	Haile-Selassie timeline, edit to Gilliam timeline, Osborn timeline (FAPE case).	S.S.	150.00	4.40	\$660.00
9/10/2021	Exchange emails with court reporter re: invoices; research file and respond to court reporter	D.S.	550.00	.30	\$165.00

9/10/2021	Conference with J. Rue re: confidentiality issue raised by AG's office on behalf of OAL; Assemble documents re: same	A.E.F.	200.00	1.00	\$200.00
9/10/2021	Attention to recent correspondence from parties to court; review of State privilege log	L.Q.	500.00	.50	\$250.00
9/10/2021	Strunk timeline work, Osborn records case timeline, call with DS re same.	S.S.	150.00	6.60	\$990.00
9/13/2021	Scan/Review/Format/Upload Ltr. Fichera to Rue re Confidential Deposition Transcripts, Filing Paper Copy, Call back from Saraya re File Sharing/Timelines.	S.D.	150.00	.20	\$30.00
9/13/2021	Meeting re Class Plaintiff Timelines w Don/Saraya/Al.	S.D.	150.00	.50	\$75.00
9/13/2021	Team call re: strategy for trial	D.S.	550.00	1.20	\$660.00
9/13/2021	Steering committee meeting, calendaring dates CR identified and others, adding steering committee to events, email Beth re pro forma, Blamble timeline, meeting with Judith Gran and John, timelines call with Don, Al, Sean, look for docs for Denise on pre trial order, management of steering committee documents, call with Al re timelines.	S.S.	150.00	4.50	\$675.00
9/13/2021	Attention to PTO.	J.D.R.	690.00	1.10	\$759.00
9/13/2021	Conference with D. Soutar re: Motion to Declare OAL Confidentiality void; Review pleadings filed by OAL and Plaintiffs' Responses thereto on discovery issues; Research re: Motion to Motion to Declare OAL Confidentiality void; Draft Motion to Declare OAL Confidentiality void; Draft email forwarding same to J. Rue and D. Soutar; Conference with D. Soutar re: same; Conference with D. Soutar and S. Sikora re: OAL case timelines for parties and non-parties; Telephone conference with S. Sikora re: same	A.E.F.	200.00	7.00	\$1,400.00

9/13/2021	Drafting letter to Judge Williams.	J.D.R.	690.00	2.20	\$1,518.00
9/13/2021	Preliminary attention to legal research re class cert renewal motion(s).	J.D.R.	690.00	2.20	\$1,518.00
9/14/2021	Get pre trial order for Denise.	S.S.	150.00	.20	\$30.00
9/14/2021	Review/Format/Upload Docket Entry re Ltr. Requesting Teleconference, Fwd to John.	S.D.	150.00	.20	\$30.00
9/14/2021	Attention to Counsel Issues re Files Access cont., E-Mail to Gran re Files Access, Attention to Don's E-Mail re Sealed Transcript, Review/Format/Upload Transcript.	S.D.	150.00	.20	\$30.00
9/14/2021	E-Mail from Don re Sealed Transcript, Call to Don re Sealed Transcript, Call to Courtroom Deputy re Copy of Transcript, E-Mail from Counsel re Files Access, Working n Issues re Counsel Access to Files.	S.D.	150.00	.30	\$45.00
9/14/2021	Review/Format/Upload Docket Entries re Attorney Correspondence, Fwd to John, Uploading Documents to Google Drive, Setting up Shared Access to Files for External Pltfs. Counsel.	S.D.	150.00	.50	\$75.00
9/14/2021	Attention to parties' recent correspondence and request to court (with exhibits) regarding confidentiality designation	L.Q.	500.00	.20	\$100.00
9/14/2021	Working on Timelines cont.	S.D.	150.00	.70	\$105.00
9/14/2021	Working on Timelines re J.M./E.M. Plaintiffs, Attention to Further Issues re Counsel Access to Case Files, Working on Timelines cont., Call back from Chambers re Sealed Transcript, E-Mail to Don, Working on Timeline cont.	S.D.	150.00	1.20	\$180.00
9/14/2021	Attention to objection to discovery ruling.	J.D.R.	690.00	1.10	\$759.00

9/14/2021	Strategy and planning re trial and third party testimony; legal research re same.	J.D.R.	690.00	1.50	\$1,035.00
9/14/2021	Further attention to drafting letter to Judge Williams.	J.D.R.	690.00	2.20	\$1,518.00
9/14/2021	Further attention to confidentiality designation dispute.	J.D.R.	690.00	2.50	\$1,725.00
9/14/2021	Work on insert for appeal of discovery order to DJ	D.S.	550.00	4.20	\$2,310.00
9/15/2021	E-Mails w Kevin re Counsel Access to Shared Files.	S.D.	150.00	.10	\$15.00
9/15/2021	Call from O'Leary for John, Call to John.	S.D.	150.00	.10	\$15.00
9/15/2021	Review/Format/Upload Docket Entry re Rue Letter re Confidential Deposition Transcripts, Fwd to John.	S.D.	150.00	.20	\$30.00
9/15/2021	Review timelines of both client and non-client parties to class action; Multiple telephone conferences with S. Sikora re: same	A.E.F.	200.00	1.00	\$200.00
9/15/2021	Moreira Timeline, call YHS re meeting, call with CMR and JR re upcoming class action events.	S.S.	150.00	2.10	\$315.00
9/16/2021	Review/Format/Upload Docket Entry re Fichera Letter re Revised Privilege Log/Deliberative Process Privilege, Fwd to John.	S.D.	150.00	.10	\$15.00
9/16/2021	Review/Format/Upload Docket Entry re Fichera Ltr. to Court Requesting Adjournment of Dispositive Motions Deadlines, Fwd to john.	S.D.	150.00	.10	\$15.00
9/16/2021	Working on Timeline re J.M. cont.	S.D.	150.00	.20	\$30.00

9/16/2021	Working on J.M. Timeline cont.	S.D.	150.00	.40	\$60.00
9/16/2021	Working on J.M Timeline cont., Sending to Saraya.	S.D.	150.00	.50	\$75.00
9/16/2021	Working on Timeline re E.M. cont.	S.D.	150.00	.60	\$90.00
9/16/2021	Working on J.M. Timeline cont., Call w Saraya re Timeline/Court-Venue, E-Mail to Saraya re Venue Information, Working on Timeline re E.M.	S.D.	150.00	.90	\$135.00
9/16/2021	Working on Timeline re J.M cont., Call from Saraya re E.P. Document Production, Attention to Files re E.P. Documents for Timeline, Working on J.M. Timeline cont.	S.D.	150.00	1.00	\$150.00
9/16/2021	Briefly review documents produced by OAL; email re: same	D.S.	550.00	.30	\$165.00
9/16/2021	Statement of Material Facts confidentiality task for CMR, call with AF re timelines, sending SD notes on the Gaskin v. PA research task.	S.S.	150.00	2.10	\$315.00
9/16/2021	Attn to appeal of Williams' decision.	J.D.R.	690.00	1.10	\$759.00
9/16/2021	Attn to legal issues re Rule 45 subpoenas, attn to brief of appeal from Williams' Decision.	J.D.R.	690.00	1.20	\$828.00
9/16/2021	Letter to Judge Williams re objection to adjournment request.	J.D.R.	690.00	1.30	\$897.00
9/16/2021	Draft letter to Judge Williams	D.S.	550.00	1.90	\$1,045.00
9/16/2021	Review pleadings and various correspondence for dates, milestones, and significant events in various cases in order to develop timeline re: same; Draft notes memorializing same;	A.E.F.	200.00	7.00	\$1,400.00

	Assemble documents re: same; Multiple telephone conferences with S. Sikora re: same				
9/17/2021	Attention to parties' recent correspondence with court re: adjournments; text orders from court resetting dates; review revised privilege log	L.Q.	500.00	1.00	\$500.00
9/17/2021	Marciante meeting setup/cancellation, work on confidentiality document re statement of material facts and send to CR, conference call with Denise, JR, Don, Tom, and CR.	S.S.	150.00	2.90	\$435.00
9/17/2021	Attn to scheduling and court order, communication with cocounsel re same	J.D.R.	690.00	1.70	\$1,173.00
9/17/2021	Review all pleadings and correspondence for Milligan (Class Action Main Plaintiff) for three cases that were referred to OAL; Draft Outline of case history for all cases focused on timeline to substantiate allegations in Second Amended complaint; Draft Memorandum outlining timeline with complete references to dates, documents, and notations of pertinent events and observations; Draft email to S. Sikora forwarding same	A.E.F.	200.00	8.00	\$1,600.00
9/17/2021	CP call re witness prep with DS and DLD, preparation for and follow up to same.	J.D.R.	690.00	2.50	\$1,725.00
9/17/2021	Strategy/planning re testimony from Amici; meeting with lead counsel for Amici (J. Valverde), preparation and follow up to same.	J.D.R.	690.00	2.50	\$1,725.00
9/17/2021	CP call re states witnesses, preparation and follow up to same.	J.D.R.	690.00	2.50	\$1,725.00
9/18/2021	Work on Moreira Timeline using Giles documents.	S.S.	150.00	.30	\$45.00
9/19/2021	Drafting letters to USMJ Williams and Hillman.	J.D.R.	690.00	2.80	\$1,932.00

9/20/2021	Call from Saraya re Lodestar Assignment.	S.D.	150.00	.10	\$15.00
9/20/2021	Review/Format/Upload J.A. Docket Entry re Withdrawal of Counsel, Fwd to John.	S.D.	150.00	.10	\$15.00
9/20/2021	Call back to Saraya re Shared Calendar Setup.	S.D.	150.00	.10	\$15.00
9/20/2021	Scan/Review/Format/Upload Ltr. Fichera to Counsel re Confidential Deposition Transcript, Fwd to John/Don, Filing Paper Copy.	S.D.	150.00	.20	\$30.00
9/20/2021	E-Mails w Gran/Kevin re Of-Counsel Access to Shared Files, Review/Format/Upload Docket Entries/Notices/Text Order re Appeal of Magistrate Judge Decision/Rue Letter to Court re Dispositive Motion Deadlines/Order Granting Extension/Rescheduling Pre-Trial Conference/Trial Date, Fwd to John, Updating Calendar/Case Tracking/Trial Calendar, E-Filing Rue Letters to Judges Hillman/Williams re Trial Adjournment/Deadlines, Call to Don re Filing, E-Filing cont., Review/Format/Upload Letters, Fwd. to John, Updating Documents on Google Drive, Downloading Docket Report.	S.D.	150.00	1.00	\$150.00
9/20/2021	Steerin committee meeting (re witnesses, filing under seal, confidentiality of transcripts, letter to Hillman), meeting with Don/John re Fichera letter, briefing schedule, joint pre-trial conference), file class action docs for John to review, lodestar Arleo assignment, culling documents for Judith, coordinating review of documents with Denise, call CMR re Summary judgment motion.	S.S.	150.00	2.80	\$420.00
9/20/2021	Prepare for team call; team call	D.S.	550.00	1.10	\$605.00
9/20/2021	Drafting letter to AG Fichera.	J.D.R.	690.00	1.10	\$759.00

9/20/2021	Steering committee meeting to discuss rescheduling issues, discovery, and SJ motion.	J.D.R.	690.00	1.80	\$1,242.00
9/20/2021	Drafting and finalizing letter to Judge Hillman; drafting and finalizing letter to Judge Williams.	J.D.R.	690.00	1.70	\$1,173.00
9/21/2021	Attention to Issues re Access to Shared Files cont., Resending Azure Active Directory Link to Gran.	S.D.	150.00	.20	\$30.00
9/21/2021	Call from Saraya re Shared Files Access Issues, Working on Issues re Attorney Access to Files.	S.D.	150.00	.30	\$45.00
9/21/2021	Managing sharepoint access to class action folder, Arleo lodestar assignment.	S.S.	150.00	.90	\$135.00
9/21/2021	Review letter to team re: assignment of work as the case moves toward trial	D.S.	550.00	1.50	\$825.00
9/21/2021	Trial prep; preliminary review of PTO; communications with co-counsel.	J.D.R.	690.00	2.20	\$1,518.00
9/22/2021	Review/Format/Upload Docket Entry, Fwd to John.	S.D.	150.00	.20	\$30.00
9/22/2021	Arleo lodestar assignment, attn to TJO email re billing, 4 PM meeting with CMR and JR.	S.S.	150.00	2.70	\$405.00
9/22/2021	Team call re: witness prep and presentation	D.S.	550.00	1.40	\$770.00
9/22/2021	Attention to strategy and planning re summary judgment briefing; conference with co-counsel re status of motion briefing and supporting materials; preliminary consideration of motions in limine; communications with adversary re confidentiality issues.	J.D.R.	690.00	3.50	\$2,415.00



9/23/2021	E-Mails w Gran re Access to Shared Files, Files Access Issue Resolved.	S.D.	150.00	.10	\$15.00
9/23/2021	Call from Saraya re Defendant Discovery Production, Attention to Files re Def. Response to Interrogatories.	S.D.	150.00	.20	\$30.00
9/23/2021	Hillman lodestar assignment, zoom class action with DS, digest meeting notes, witness task using interrogatories, PRISE for CMR.	S.S.	150.00	3.90	\$585.00
9/23/2021	Attention to motion to seal rules, related legal research.	J.D.R.	690.00	1.40	\$966.00
9/23/2021	Further attention to confidentiality designation dispute.	J.D.R.	690.00	1.50	\$1,035.00
9/24/2021	Attention to recent correspondence for parties; text orders from court	L.Q.	500.00	.20	\$100.00
9/24/2021	Organization and planning re steering committee.	J.D.R.	690.00	1.10	\$759.00
9/24/2021	Meeting with JR and TJO re witnesses, trial prep, scheduling, call CMR re briefing schedule, tasks from TJO meeting- gathering and reorg documents, scheduling, steering committee monday agenda, review of text order for scheduling purposes, meet with John on steering committee agenda/his Class Action agenda, filing OPRA docs, calendaring CMR dates.	S.S.	150.00	5.80	\$870.00
9/24/2021	Legal research re OTSC / irreparable harm.	J.D.R.	690.00	1.50	\$1,035.00
9/25/2021	Steering committee agenda making, Rule 45 subpoena draft for Judge Bass plus accompanying letters.	S.S.	150.00	1.50	\$225.00
9/27/2021	Review/Format/Upload Docket Entry re Amended Scheduling Order, Updating Calendar/Case Tracking, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00

9/27/2021	Call from Saraya re Briefing Book, Attention to Logistics re Briefing Book Production.	S.D.	150.00	.20	\$30.00
9/27/2021	Call from Saraya re Briefing Book, Attention to Logistics re Briefing Binder cont.	S.D.	150.00	.20	\$30.00
9/27/2021	Call with co-counsel re related case.	J.D.R.	690.00	.60	\$414.00
9/27/2021	Steering committee meeting, follow-up to same, digest steering committee notes, call Denise re attendance at steering committee meeting, adding items to John's agenda related to the class action from the notes, call with JR re briefing book, getting briefing binder supplies from Office Depot, printing the docs and assembling the binder, taking it over to John's.	S.S.	150.00	4.00	\$600.00
9/27/2021	Planning meeting for trial strategy and witness selection	D.S.	550.00	1.10	\$605.00
9/27/2021	Attention to class certification briefing.	J.D.R.	690.00	1.20	\$828.00
9/27/2021	steering committee meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
9/28/2021	Reminder E-Mail to John/Don/Krista re Pre-Trial Order Deadlines.	S.D.	150.00	.10	\$15.00
9/28/2021	Call from Saraya re Counsel Draft Collaboration.	S.D.	150.00	.10	\$15.00
9/28/2021	Attention to Saraya's E-mail re Shared Files Access, Adding External Counsel to Azure Active Directory, E-Mail to External Counsel.	S.D.	150.00	.20	\$30.00
9/28/2021	Attention to Don's Spreadsheet re Casefiles, Drafting Timelines re Casefiles, Attention to Granting External Counsel Access to Shared Files, Drafting Timelines cont.	S.D.	150.00	1.10	\$165.00

9/28/2021	Call with R. Thurston re related case pending in 3rd Circuit; emails re same.	J.D.R.	690.00	.50	\$345.00
9/28/2021	Talk with CMR re docs JR can edit (56.1 SOMF), move docs where JR needs them, Hillman lodestar analysis and creation of corresponding excel file.	S.S.	150.00	2.10	\$315.00
9/28/2021	Strategy and planning re overall pre-trial schedule.	J.D.R.	690.00	1.30	\$897.00
9/29/2021	Working on Timelines re Case Files cont.	S.D.	150.00	.10	\$15.00
9/29/2021	Review/revise/comment on draft letter and enclosure to Judge Hillman	D.S.	550.00	.20	\$110.00
9/29/2021	Working on Timelines re Casefiles cont.	S.D.	150.00	.80	\$120.00
9/29/2021	Attention to scheduling issues re briefing appeal of Williams decision.	J.D.R.	690.00	.20	\$138.00
9/29/2021	Organize docs for JR review, email CMR re edits to 56.1 SOMF, Hillman lodestar analysis.	S.S.	150.00	1.20	\$180.00
9/29/2021	Working on Timelines re Casefiles cont., Sending to Saraya.	S.D.	150.00	1.90	\$285.00
9/29/2021	Review of materials related to systemic witnesses; attention to 56.1 statement; attention to SJ briefing.	J.D.R.	690.00	3.30	\$2,277.00
9/30/2021	Review/Format/Upload Docket Entries re Fichera Letter to Court re Request for Extension of Time to Oppose Pltf Appeal of Order, Fwd to John.	S.D.	150.00	.10	\$15.00
9/30/2021	Review/Format/Upload Text Order Scheduling Discovery Conference, Updating Case Tracking/Calendar.	S.D.	150.00	.10	\$15.00

9/30/2021	Review/Format/Upload Docket Entries re Letter Requesting Motion Opposition Adjournment, Fwd to John.	S.D.	150.00	.10	\$15.00
9/30/2021	Review/Format/Upload Text Order Adjourning Def. Response to Pltf. Appeal of Order, Updating Calendar/Case Tracking Call w Saraya/Don re Calendar.	S.D.	150.00	.30	\$45.00
9/30/2021	Prepare for, travel, and attend conference with J. Rue re: witness preparation; Attend zoom conference along with J. Rue interviewing main witnesses; Draft notes re: same	A.E.F.	200.00	1.00	\$200.00
9/30/2021	Look up whether Jenny's name was disclosed in our rog response, CP Call at 4 PM, call SD re class action scheduling, TJO meeting, follow up task outlining from CA meetings.	S.S.	150.00	1.70	\$255.00
9/30/2021	Meeting with A Ford re class action.	J.D.R.	690.00	1.00	\$690.00
9/30/2021	Meeting to discuss witnesses for Class Action	D.S.	550.00	1.50	\$825.00
9/30/2021	Meeting with counsel for Amici, strategy and planning for trial testimony re same.	J.D.R.	690.00	1.50	\$1,035.00
9/30/2021	Trial planning/preparation re state witnesses, amicus witnesses.	J.D.R.	690.00	2.50	\$1,725.00
10/1/2021	TJO meeting re witnesses, SJ motion, defense strategy.	S.S.	150.00	1.10	\$165.00
10/1/2021	TJO meeting- strategy and planning re trial testimony of adverse witnesses, preparation for and follow-up to same.	J.D.R.	690.00	1.90	\$1,311.00
10/2/2021	Print documents for binder, go to office depot and get supplies, go to John's and assemble binders and drive back to office.	S.S.	150.00	1.40	\$210.00
10/3/2021	Print Hendricks doc, Lexis NLH transcript research.	S.S.	150.00	.20	\$30.00

10/4/2021	Review/Format/Upload Text Order re Discovery Conference, Updating Calendar/Case Tracking, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00
10/4/2021	Schedule Giles/JR meeting re hearing plan, SJ brief send to J. Wasserman, Hillman transcript research, steering committee agenda, call DS re assignment on consent order, work on consent order assignment re case caption.	S.S.	150.00	2.00	\$300.00
10/4/2021	Steering Committee Conference; follow-up on issues related to same	D.S.	550.00	.70	\$385.00
10/4/2021	Attn to trial prep, specific witnesses (Bass, Sanders); attn to briefing Summary Judgement and Class Cert.	J.D.R.	690.00	2.80	\$1,932.00
10/5/2021	Reminder E-mail to John/Don/Krista re Deadlines.	S.D.	150.00	.10	\$15.00
10/5/2021	Calendar Giles/JR meeting, zoom re Kerry Soranno and trial timing, consent order work for case caption (plus call with DS re same), subpoenas, NLH Lexis transcript research.	S.S.	150.00	3.50	\$525.00
10/5/2021	Call with Mr. Weber at AG's office re Soranno and adjournments; preparation and follow-up to same; further attention to class cert brief; further attention to SJ brief.	J.D.R.	690.00	4.80	\$3,312.00
10/6/2021	Review/Format/Upload Text Order/Docket Entry re Adjournment/Scheduling Order, Updating Calendar/Case Tracking/Trail Calendar, Fwd to John.	S.D.	150.00	.20	\$30.00
10/6/2021	Emails with co-counsel re: deposition exhibits	D.S.	550.00	.20	\$110.00
10/6/2021	Phone call from S. Sikora re: Deposition notices; review file re: same; email to co-counsel re: same	D.S.	550.00	.30	\$165.00
10/6/2021	Team conference re: planning for hearing	D.S.	550.00	.70	\$385.00

10/6/2021	Read class action emails re adjournment, mtg re hearing prep, look for docs for DG, class action zoom, schedule another CA call, subpoena work-Bass, Sanders, Hendricks, 30b6 (subpoenas, accompanying letters, and Schedule A), shuffle CA docs for JR, CMR call, NLH transcript Lexis research.	S.S.	150.00	5.10	\$765.00
10/6/2021	Attention to summary judgment briefing; attention to class certification briefing; related research re same.	J.D.R.	690.00	4.30	\$2,967.00
10/7/2021	Call from John re Letter Filing.	S.D.	150.00	.10	\$15.00
10/7/2021	Call from John re E-Filing Letter, Attention to E-Mails re Filing.	S.D.	150.00	.10	\$15.00
10/7/2021	Attention to E-Mails re E-Filing cont.	S.D.	150.00	.10	\$15.00
10/7/2021	Review/Format/Upload Text Orders re DAG Adjournment Requests, Fwd to John, Updating Calendar.	S.D.	150.00	.20	\$30.00
10/7/2021	E-Mail from John re E-Filing, E-Filing Letter to Judge Williams, Review/Format/Upload Docket Entry, Fwd to John.	S.D.	150.00	.30	\$45.00
10/7/2021	Call from John re Scheduling Order, Review/Format/Upload Text Order, Resetting Deadlines, Updating Case Tracking/Calendar/Trial Calendar.	S.D.	150.00	.30	\$45.00
10/7/2021	Cancel meeting, zoom, sharepoint maintenance of class action folder, Lexis Hillman transcript research, call with Giles re Rule 45 subpoenas.	S.S.	150.00	.70	\$105.00
10/7/2021	Review docket entry; internal communications re: same; review/revise draft letter re: same	D.S.	550.00	.60	\$330.00
10/7/2021	Attention to text order re deadlines; team call to discuss same; call with DAG Weber re same; call with chambers re same; drafting and submitting joint letter re same.	J.D.R.	690.00	2.80	\$1,932.00

10/7/2021	Class action, legal research and analysis of Rule 53 and related authorities	J.D.R.	690.00	4.50	\$3,105.00
10/8/2021	Status update conference with Amici	D.S.	550.00	1.00	\$550.00
10/8/2021	Attention to meeting with potential non-profit witnesses/meeting with J.R. re. same	S.Q.E.	500.00	1.30	\$650.00
10/8/2021	Rule 45 subpoenas- drafting letters, schedule, subpoenas, comm with DG and DS, PDF signing, combining pdf, making edits, service research, Amici meeting (took notes), preparing docs for service and transmittal to defense counsel.	S.S.	150.00	5.40	\$810.00
10/8/2021	Meeting with potential witnesses from amici group; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
10/8/2021	Further research and attention to cases and authorities regarding the use of special masters.	J.D.R.	690.00	3.30	\$2,277.00
10/11/2021	Review/Format/Upload Docket Entry re Notice of Appearance re DAG Labin, Fwd to John.	S.D.	150.00	.10	\$15.00
10/11/2021	Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00
10/11/2021	Hillman Lexis transcript research, Strunk index.	S.S.	150.00	.60	\$90.00
10/11/2021	Attention to summary judgment briefing.	J.D.R.	690.00	1.20	\$828.00
10/12/2021	Reschedule steering committee meetings, NLH transcript research on Lexis (and spreadsheet creation), order KMW hearing transcript, DO FAPE timeline work.	S.S.	150.00	1.80	\$270.00

10/12/2021	Discovery conference with Magistrate Judge Karen Williams over zoom.	S.S.	150.00	2.10	\$315.00
10/12/2021	Attend Court Conference on discovery issues; follow-up team call re: same	D.S.	550.00	2.40	\$1,320.00
10/12/2021	Discovery zoom conference with Magistrate Judge Williams, preparation for and follow up to same.	J.D.R.	690.00	2.50	\$1,725.00
10/13/2021	Call from Saraya re Transcripts.	S.D.	150.00	.10	\$15.00
10/13/2021	Call from Saraya re Hillman Transcripts/Post Trial Briefs.	S.D.	150.00	.10	\$15.00
10/13/2021	Review/Format/Upload Amended Scheduling Order, Updating Calendar/Case Tracking, Fwd to John.	S.D.	150.00	.20	\$30.00
10/13/2021	Attn to deadlines to serve trial subpoenas.	J.D.R.	690.00	.20	\$138.00
10/13/2021	Attn to correspondence with Labin re Pre-Trial Order.	J.D.R.	690.00	.50	\$345.00
10/13/2021	Assist with Opening Argument project	D.S.	550.00	1.00	\$550.00
10/13/2021	NLH Transcript assignment, coordinate with DS to use courtlinks to check docket entries for select cases, work on selecting those cases, CA meeting with steering committee on yesterday's conference with Williams, work on getting transcript of yesterday's hearing, calendaring CA dates, send transcripts from NLH trials with opening statements to JR kindle.	S.S.	150.00	4.00	\$600.00
10/13/2021	Attn to drafting letters to the court (Judge Hillman and Magistrate Judge Williams).	J.D.R.	690.00	2.30	\$1,587.00



10/13/2021	Meeting with Soutar, Giles, discussed trial subpoenas, briefing schedule, transcript confidentiality designations and confidentiality order, discussion of letter to Hillman (re consent order and CP individual case linkage), Fichera (re notice of objection to designations), preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
10/14/2021	Review/Format/Upload Docket Entries re Minute Entry/Order, Fwd to John, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
10/14/2021	Index of production documents- Strunk docs.	S.S.	150.00	.60	\$90.00
10/14/2021	Zoom conference re: later to court	D.S.	550.00	.30	\$165.00
10/14/2021	Review/revise draft letter to Judge Williams	D.S.	550.00	.30	\$165.00
10/14/2021	Attention to status after 10/12 conference with court; recent correspondence from parties to court; orders from court amending scheduling order and decisions on motion to compel discovery	L.Q.	500.00	.50	\$250.00
10/14/2021	Attn to settlement strategy, legal research re special masters, correspondence with adversary re scheduling, further attention to letter to Judge Hillman.	J.D.R.	690.00	4.70	\$3,243.00
10/15/2021	Index of Strunk produced docs.	S.S.	150.00	.90	\$135.00
10/15/2021	Further attention to settlement strategy.	J.D.R.	690.00	.80	\$552.00
10/17/2021	Index Strunk production documents.	S.S.	150.00	1.90	\$285.00
10/18/2021	Review/Format/Upload Docket Entry re Rue Ltr. to Court re Adjourn Pretrial Conference, Fwd to John, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00

10/18/2021	Strunk index of production documents.	S.S.	150.00	2.70	\$405.00
10/19/2021	Scan/Review/Format/Upload Deposition Notice re C.P., Filing Paper Copy.	S.D.	150.00	.10	\$15.00
10/19/2021	E-Mail to John/Don/Krista re Discovery Deadlines.	S.D.	150.00	.10	\$15.00
10/19/2021	MS Index, Sweeten Index.	S.S.	150.00	.80	\$120.00
10/19/2021	Attention to DOE supplemental production of documents.	J.D.R.	690.00	1.50	\$1,035.00
10/20/2021	Attention to Steering Committee E-Mails re Discovery Issues.	S.D.	150.00	.10	\$15.00
10/20/2021	Sweeten production document index, Feinberg email, send Index draft to Don to get advice on doing Perry/Marvin/Milligan/Fienberg/Moreira index and attn to his reply.	S.S.	150.00	1.10	\$165.00
10/20/2021	Attention to scheduling issues.	J.D.R.	690.00	.80	\$552.00
10/21/2021	Fienberg Index of production documents.	S.S.	150.00	1.50	\$225.00
10/22/2021	DNJ Excel assignment re judges and appointment year, email to JR re same.	S.S.	150.00	.70	\$105.00
10/22/2021	Call with adversary re settlement, preparation and follow-up to same, attention to OAL confidentiality designations.	J.D.R.	690.00	3.50	\$2,415.00
10/23/2021	Gaskin class cert research.	S.S.	150.00	1.20	\$180.00

10/23/2021	Finish DF index, do Moreira index from Hogan docs shared on Walsh platform.	S.S.	150.00	1.70	\$255.00
10/23/2021	Work on response to OAL's letter to Judge Williams	D.S.	550.00	2.80	\$1,540.00
10/25/2021	Attention to letters to court and text order rescheduling pre-trial conference	L.Q.	500.00	.10	\$50.00
10/25/2021	Research on special ed connection re later evaluations for lead amicus counsel in class action.	S.S.	150.00	2.80	\$420.00
10/26/2021	Review/Format/Upload Docket Entry/Text Order re Reschedule Final Pre-Trial Conference/Deposition Confidentiality Designations, Fwd to John, Updating Calendar/Case Tracking.	S.D.	150.00	.20	\$30.00
10/26/2021	Downloading Docket Report, Uploading Documents to Google Drive.	S.D.	150.00	.20	\$30.00
10/26/2021	Gaskin class cert research, emails on Perry/Marvin/Milligan docs.	S.S.	150.00	.60	\$90.00
10/26/2021	Work on opposition to OAL designations	D.S.	550.00	3.10	\$1,705.00
10/27/2021	Perry Index, get docs from MH and put on sharepoint.	S.S.	150.00	2.80	\$420.00
10/28/2021	Perry index creation (excel).	S.S.	150.00	.70	\$105.00
10/28/2021	Attention to strategy and scheduling issues, attn to class cert briefing.	J.D.R.	690.00	3.10	\$2,139.00

10/29/2021	Driscoll email re tranquility letter to Carlucci with attachment.	S.S.	150.00	.10	\$15.00
10/29/2021	Specific extension research on LEXIS, 300.515, citing decisions, general term searches.	S.S.	150.00	1.10	\$165.00
10/31/2021	Attention to objection to OAL designations.	J.D.R.	690.00	1.50	\$1,035.00
11/1/2021	300.515 research (specific extension)	S.S.	150.00	.50	\$75.00
11/1/2021	Review/respond to comments on draft challenge to confidentiality designation	D.S.	550.00	.40	\$220.00
11/1/2021	Further attention to objections to OAL designations.	J.D.R.	690.00	.50	\$345.00
11/2/2021	E-Mail to John/Don/Krista re Deadline to Oppose Deposition Confidentiality Designations Letter, Downloading Docket Report, Attention to Maintaining Docket Entries on Google Drive.	S.D.	150.00	.20	\$30.00
11/2/2021	E-Mail from Saraya re Deposition Transcripts, Attention to Files re Transcript, Call/E-mail to Saraya.	S.D.	150.00	.30	\$45.00
11/2/2021	Work on opposition to confidentiality designations	D.S.	550.00	.80	\$440.00
11/2/2021	Perry Index, 300.515 research, getting transcripts from reporters for Catherine for CP and 2 other plaintiffs.	S.S.	150.00	2.80	\$420.00
11/2/2021	Meeting with lead discovery counsel re status and developments in the case; preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00
11/2/2021	Consultation with class action practitioner about 23b2 v. 23b3; meeting with steering committee team re same; further attention to strategy re class certification.	J.D.R.	690.00	3.80	\$2,622.00

11/3/2021	300.515 research on Lexis plus write up/highlight pdf case files, get docs to JR re requested from the class action docket.	S.S.	150.00	2.10	\$315.00
11/3/2021	Review/revise draft opposition to confidentiality designations and circulate for internal review	D.S.	550.00	3.00	\$1,650.00
11/4/2021	Review/Format/Upload Docket Entry re Ltr. Rue to Court re Confidentiality Designations.	S.D.	150.00	.10	\$15.00
11/4/2021	Review of Pl. letter re: confidentiality designations	L.Q.	500.00	.10	\$50.00
11/4/2021	Perry index, Marvin index, JR/DS call re index and 10.5k page Marvin production, 300.515 specific extension research.	S.S.	150.00	5.10	\$765.00
11/5/2021	Marvin Index, Gaskin research, 300.515 research (law review article), check docket for logistics conference scheduling.	S.S.	150.00	3.70	\$555.00
11/7/2021	Get Motion for summary judgment brief for JR.	S.S.	150.00	.10	\$15.00
11/7/2021	Get MSJ Brief, current one for JR.	S.S.	150.00	.10	\$15.00
11/7/2021	Attention to strategy and planning re coordination with individual cases.	J.D.R.	690.00	1.10	\$759.00
11/8/2021	Call from Saraya re Interrogatory Responses, Attention to Files.	S.D.	150.00	.10	\$15.00
11/8/2021	Steering committee meeting (cut off with internet outage), put together witness list for John.	S.S.	150.00	.80	\$120.00
11/8/2021	Team strategy call	D.S.	550.00	.50	\$275.00

11/8/2021	Attention to scheduling settlement discussion.	J.D.R.	690.00	.60	\$414.00
11/8/2021	Attention to witness list.	J.D.R.	690.00	1.50	\$1,035.00
11/8/2021	Attention to research and drafting SJ Motion.	J.D.R.	690.00	2.70	\$1,863.00
11/9/2021	Review/Format/Upload J.A. Docket Notice, Review/Format/Upload Docket Notice/Entry re Judge Assignment/Notice of Appearance.	S.D.	150.00	.20	\$30.00
11/9/2021	Review/Format/Upload Docket Entry re Ltr. O'Leary to Court re Discovery Issues/Judge Assignment, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00
11/9/2021	Attention to Saraya/Reisman E-Mail re Deadlines, Updating Calendar/Case Tracking, Call w Saraya re Deadlines, Review of Calendar/Deadlines.	S.D.	150.00	.30	\$45.00
11/9/2021	Attention to recent correspondence from parties and updates from court	L.Q.	500.00	.20	\$100.00
11/9/2021	Calendar class action dates, look in docket for PTO date, CA calendar check with CMR dates, Marvin Index, SD call re CMR dates, call DS re logistics conf.	S.S.	150.00	1.20	\$180.00
11/10/2021	Marvin index.	S.S.	150.00	1.70	\$255.00
11/11/2021	Flom email- digest research tasks he wants from us, Flom zoom meeting, email to Flom, 300.515 finish up research notes and send to CMR and JR.	S.S.	150.00	1.70	\$255.00
11/12/2021	Marvin index, email re PTO, call to CMR re exhibits, email to DLD/CMR re P-357, emails re sharing docs with DAGs, PTO doc shuffling to sharefile, email docs to Labin.	S.S.	150.00	3.60	\$540.00
11/12/2021	Attention to final PTO	J.D.R.	690.00	1.20	\$828.00

11/12/2021	Further attention to research and strategy re federal filing.	J.D.R.	690.00	1.40	\$966.00
11/15/2021	Attention to John's E-Mail re Deadlines, Call to Saraya re Deadlines/Respond to John's Inquiry.	S.D.	150.00	.10	\$15.00
11/15/2021	Further attention to legal research re class certification; attention to draft briefing.	J.D.R.	690.00	3.00	\$2,070.00
11/15/2021	Attendance at steering committee meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
11/16/2021	Downloading Docket Report, Attention to Updating Documents on Google Drive.	S.D.	150.00	.10	\$15.00
11/16/2021	Close review of CP deposition transcript.	J.D.R.	690.00	2.50	\$1,725.00
11/17/2021	Further attention to 23b2 brief.	J.D.R.	690.00	3.30	\$2,277.00
11/17/2021	Further attention to SJ brief.	J.D.R.	690.00	3.50	\$2,415.00
11/17/2021	Further attention to 23b3 brief.	J.D.R.	690.00	4.40	\$3,036.00
11/18/2021	Review confidentiality designations in Sanders Deposition and report on same	D.S.	550.00	.40	\$220.00
11/18/2021	Attention to review of DRAFT pl. motions for Summary Judgment	L.Q.	500.00	.40	\$200.00
11/18/2021	Further attention to 23b2 motion brief.	J.D.R.	690.00	2.50	\$1,725.00

11/18/2021	Further attention to SJ motion brief.	J.D.R.	690.00	3.30	\$2,277.00
11/18/2021	Further attention to 23b3 brief.	J.D.R.	690.00	3.30	\$2,277.00
11/19/2021	Telephone conference re: source of documents relied upon in inserts	D.S.	550.00	.10	\$55.00
11/19/2021	Call with Don re Fienberg adjournments, drafted memo to file, uploaded memo to file and adjournment letters to network	M.P.C.	300.00	.30	\$90.00
11/19/2021	Complete proposed changes to Brief and Rule 56.1 Statement and draft detailed email to co-counsel	D.S.	550.00	1.40	\$770.00
11/19/2021	Further attention to 23b2 briefing.	J.D.R.	690.00	1.30	\$897.00
11/19/2021	Further attention to PSOMF.	J.D.R.	690.00	1.60	\$1,104.00
11/19/2021	Attend to factual investigation of D.O and D.F. cases; propose changes to Rule 56.1 Statement and brief	D.S.	550.00	2.60	\$1,430.00
11/19/2021	Further attention to summary judgment briefing.	J.D.R.	690.00	2.40	\$1,656.00
11/19/2021	Further attention to 23b3 briefing.	J.D.R.	690.00	2.80	\$1,932.00
11/20/2021	Attention to 23b3 briefing	J.D.R.	690.00	2.40	\$1,656.00
11/20/2021	Attention to SJ briefing.	J.D.R.	690.00	3.30	\$2,277.00



11/20/2021	Attention to 23b2 briefing.	J.D.R.	690.00	4.20	\$2,898.00
11/22/2021	Zoom Meeting w John/Reisman re Motion Filings.	S.D.	150.00	.20	\$30.00
11/22/2021	Attention to docket activity; response to request from USMJ	J.D.R.	690.00	.40	\$276.00
11/22/2021	Attention to scheduling issues.	J.D.R.	690.00	.50	\$345.00
11/22/2021	Attention to amicus testimony and trial planning.	J.D.R.	690.00	2.60	\$1,794.00
11/22/2021	Attention to final issues re SJ and class cert motions.	J.D.R.	690.00	5.50	\$3,795.00
11/23/2021	Formatting/Sealed Exhibits cont., Preparing Paper Copy of Transcripts/ ECF Documents for Transmittal to Judge Skahill.	S.D.	150.00	.70	\$105.00
11/23/2021	Finalize and file JDR letter with Court; prepare email service and send same	D.S.	550.00	.40	\$220.00
11/23/2021	Preparing Paper Copies/Letter to Judge Skahill re Confidentiality Designations, Calls to Don re Paper Copies, Preparing Courtesy Copies cont., E-Mail from Don re Letter, Preparing Letter for Shipment cont., Shipping at Post Office, Return to Office.	S.D.	150.00	1.40	\$210.00
11/23/2021	Attention to providing courtesy copies to the Court.	J.D.R.	690.00	.50	\$345.00
11/23/2021	Attention to defendant exhibits, not previously produced in discovery.	J.D.R.	690.00	.60	\$414.00

11/23/2021	Attention to responding to Court request for availability of counsel for conference.	J.D.R.	690.00	.60	\$414.00
11/23/2021	Draft letter to Judge Skahill re: submissions related to OAL designations	D.S.	550.00	.80	\$440.00
11/23/2021	Revise draft letter per J. Rue and circulate for team review	D.S.	550.00	1.00	\$550.00
11/23/2021	Review/Format/Upload Docket Entries/Notices re Motions for Class Certification/Motion for Summary Judgment/Text Order Scheduling Telephone Conference/Motion for Leave to File Excess Pages, Updating Documents on Google Drive, Downloading NJDOE Copies of Sealed Exhibits, Review/Format Sealed Exhibits.	S.D.	150.00	2.90	\$435.00
11/23/2021	Strategy and planning.	J.D.R.	690.00	1.10	\$759.00
11/24/2021	Updating Calendar/Case Tracking re Docket Notice Scheduling Motion Dates/Text Order Scheduling Teleconference/Pretrial Conference.	S.D.	150.00	.20	\$30.00
11/24/2021	Review/Format/Upload Docket Entries re Letters to Court re Confidentiality Designations/Adjournment Request, Fwd to John, Downloading Docket Report.	S.D.	150.00	.30	\$45.00
11/24/2021	Review/comment on emails re: request to adjourn motion date, including researching motion days/briefing schedules	D.S.	550.00	.20	\$110.00
11/24/2021	Attention to reading and annotating parties' cross motions for summary judgement; Pl. motions for class certification	L.Q.	500.00	1.40	\$700.00
11/24/2021	Attention to responding to request for adjournment from njdoe.	J.D.R.	690.00	1.50	\$1,035.00
11/24/2021	Drafting letter to DAG Klika.	J.D.R.	690.00	1.50	\$1,035.00

11/28/2021	Trial planning and prep.	J.D.R.	690.00	1.50	\$1,035.00
11/29/2021	Updating Documents on Google Drive.	S.D.	150.00	.10	\$15.00
11/29/2021	Review/Format/Upload Docket Entry/Text Order re Letter Requesting Extension/Order Granting Extension, Fwd to John, Updating Calendar/Case Tracking, Call from John re Rule 11 Motion.	S.D.	150.00	.30	\$45.00
11/29/2021	Formatting Rule 11 Motion Drafts, Call/E-Mail to Don re Notice of Motion, Sending Documents to John for Review.	S.D.	150.00	.60	\$90.00
11/30/2021	Call from John re Rule 11 Notice, Zoom Meeting w John re Updated Drafts, Attention to Drafts.	S.D.	150.00	.20	\$30.00
11/30/2021	Review/Format/Upload Docket Entries/Text Order re Motion Date/Motion Deadlines, Fwd to John, Updating Calendar/Case Tracking.	S.D.	150.00	.50	\$75.00
11/30/2021	Preparing Certified Shipment of Rule 11 Motion Papers to Defs. Shipping at Post Office.	S.D.	150.00	.80	\$120.00
11/30/2021	Further attention to scheduling.	J.D.R.	690.00	1.20	\$828.00
11/30/2021	Attention to Rule 11 motion papers.	J.D.R.	690.00	2.20	\$1,518.00
11/30/2021	Further attention to Rule 11 motion papers.	J.D.R.	690.00	2.20	\$1,518.00
11/30/2021	Attention to drafting correspondence to Judge Hillman.	J.D.R.	690.00	2.50	\$1,725.00
12/1/2021	Review/Format/Upload Docket Entries re Counsel Correspondence re Filing Extension Requests, Fwd to John.	S.D.	150.00	.20	\$30.00

12/1/2021	Review/Format/Upload Docket Entries re Text Orders Adjourning Def. Opposition Brief Due Dates, Updating Case Tracking/Calendar, E-Mails w John re Rule 11 Motion, Working on Updated Rule 11 Notice Papers, Sending Drafts to John.	S.D.	150.00	.60	\$90.00
12/1/2021	Attention to scheduling.	J.D.R.	690.00	.50	\$345.00
12/1/2021	Further attention to Rule 11 motion; strategy.	J.D.R.	690.00	1.80	\$1,242.00
12/2/2021	Review/Format/Upload Docket Entry re Def. Request for Motion Date Adjournment.	S.D.	150.00	.10	\$15.00
12/2/2021	Legal research re Rule 11 motion.	J.D.R.	690.00	1.10	\$759.00
12/2/2021	Attention to corrected Rule 11 motion papers.	J.D.R.	690.00	2.50	\$1,725.00
12/3/2021	Call to John re Rule 11 Corrected Motion Papers/Cover Letter, Drafting Cover Letter, Preparing Papers for Shipment to Attorney General's Office, Shipping at Post Office, Return to Office.	S.D.	150.00	.60	\$90.00
12/3/2021	Attention to recent correspondence from parties and text orders from the court review of Pl. draft Rule 11 brief;	L.Q.	500.00	.50	\$250.00
12/3/2021	Attention to scheduling issues.	J.D.R.	690.00	1.30	\$897.00
12/5/2021	Trial prep and planning.	J.D.R.	690.00	1.50	\$1,035.00
12/6/2021	Review/Format/Upload Docket Entry re Soranno Ltr. Requesting Adjournment of Summary Judgment Motions, Fwd to John, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00

12/6/2021	Review/Format/Upload Docket Notices Resetting Motion Deadlines/Rescheduling Status Conference, Updating Calendar/Case Tracking, Downloading Docket Report.	S.D.	150.00	.30	\$45.00
12/6/2021	Attention to scheduling.	J.D.R.	690.00	.50	\$345.00
12/6/2021	Trial strategy and planning.	J.D.R.	690.00	.80	\$552.00
12/7/2021	Attention to scheduling.	J.D.R.	690.00	.80	\$552.00
12/7/2021	Trial prep and planning.	J.D.R.	690.00	2.20	\$1,518.00
12/7/2021	Further attention to strategy and planning re motion practice.	J.D.R.	690.00	2.50	\$1,725.00
12/8/2021	Strategy and planning re amici witnesses; preparation for and follow-up re same.	J.D.R.	690.00	1.50	\$1,035.00
12/8/2021	Meeting with counsel for amici re testimony; preparation for and follow-up to same.	J.D.R.	690.00	1.80	\$1,242.00
12/8/2021	Further attention to opposition to njdoe MSJ.	J.D.R.	690.00	2.10	\$1,449.00
12/9/2021	Review/Format/Upload Docket Entry re O'Leary Letter to Court.	S.D.	150.00	.10	\$15.00
12/9/2021	Further attention to planning and strategy re amicus testimony.	J.D.R.	690.00	.80	\$552.00
12/9/2021	Team consultation re third party witnesses; strategy and planning re same.	J.D.R.	690.00	1.50	\$1,035.00

12/10/2021	E-Mail to John/Krista re Joint Pre-Trial Order Deadline.	S.D.	150.00	.10	\$15.00
12/10/2021	Review/Format/Upload Class Action Docket Entries/Notice re Decision Appeal	S.D.	150.00	.30	\$45.00
12/10/2021	Oppositions/Text Order Adjourning Summary Judgment Motions, Fwd to John, Updating Calendar/Case Tracking.				
12/10/2021	Attention to review of recent correspondence; 3rd party opposition brief and orders from court	L.Q.	500.00	.50	\$250.00
12/13/2021	Review/Format/Upload Docket Entry re Counsel Letters re Appeal of Magistrate's Order/Joint Pre-Trial Order, Fwd to John.	S.D.	150.00	.20	\$30.00
12/13/2021	Review/Format/Upload Text Order Adjourning Pre-Trial Order Deadline, Fwd to John, Updating Calendar/Case Tracking, Downloading Docket Report, Updating Documents on Google Drive.	S.D.	150.00	.20	\$30.00
12/13/2021	Call/E-Mail from John re Filing, Preparing Letter for E-Filing, E-Filing on PACER, Review/Format/Upload Docket Entry/Notice re Text Order Scheduling Reply Brief/Rue Letter to Court, Fwd to John, Updating Calendar/Case Tracking.	S.D.	150.00	.30	\$45.00
12/13/2021	Plaintiffs steering committee meeting; preparation for and follow-up to same.	J.D.R.	690.00	1.80	\$1,242.00
12/13/2021	Attention to PTO; drafting letter to Magistrate.	J.D.R.	690.00	2.50	\$1,725.00
12/14/2021	Review/Format/Upload Docket Entries re Minute Entry/Order Granting Extension, Fwd to John, Updating Case Tracking/Calendar, Attention to Calendar Appointments Fwded by Walsh Law Firm, Updating Calendar.	S.D.	150.00	.40	\$60.00
12/14/2021	Letter to amici re confidentiality designations.	J.D.R.	690.00	1.50	\$1,035.00
12/14/2021	Discovery conference with Judge Skahill; preparation for and followup to same.	J.D.R.	690.00	3.50	\$2,415.00

12/15/2021	Attention to PTO / strategy and planning PTC with Judge Skahill.	J.D.R.	690.00	3.50	\$2,415.00
12/16/2021	Attention to Saran E-Mail re Filings/Deadlines, Attention to Files, Call to Saran.	S.D.	150.00	.10	\$15.00
12/16/2021	Attention to documents relevant to administrative procedures factual timelines.	J.D.R.	690.00	1.50	\$1,035.00
12/16/2021	Further attention to letter to Judge Skahill.	J.D.R.	690.00	2.20	\$1,518.00
12/16/2021	Preparation of amicus witness testimony; meeting with witnesses; follow-up to same. Further attention to PTO.	J.D.R.	690.00	4.50	\$3,105.00
12/17/2021	Call from Saran re Deadlines, Attention to Files/Calendar re Deadlines.	S.D.	150.00	.20	\$30.00
12/17/2021	Review/Format/Upload Docket Entries re Order Striking Confidentiality Designations/Counsel Letters re Pre-Trial Conference, Fwd to John.	S.D.	150.00	.40	\$60.00
12/17/2021	Attention to review of joint pre-trial order, recent correspondence from parties; court order from 12/14 proceedings	L.Q.	500.00	.60	\$300.00
12/17/2021	Preparation of amicus witness testimony; meeting with witnesses; follow-up to same.	J.D.R.	690.00	1.70	\$1,173.00
12/17/2021	Trial prep and strategy; legal research re FRE; further attention to finalizing PTO.	J.D.R.	690.00	5.50	\$3,795.00
12/20/2021	Drafting Tables of Authorities/Table of Contents re Reply re Appeal of Magistrate Decision, Calls from John re Brief/Certification Edits, Working on Brief/Cert. cont.	S.D.	150.00	1.10	\$165.00
12/20/2021	Working on Reply Brief cont., Sending to John, Updating Certification to Brief, Call from John re Brief Edits, Working on Certification cont., Sending to John, E-Mails w John re Brief Edits,	S.D.	150.00	1.50	\$225.00

12/20/2021	Editing Brief cont., Finalizing Brief/Certification, E-Filing on PACER, Review/Format/Upload Docket Entries re Reply Brief, Downloading Docket Report, Updating Documents on Google Drive. Attention to Rule 11 strategy and analysis.	J.D.R.	690.00	.80	\$552.00
12/20/2021	Review class action pleadings re: motion in limine and Rule 11 Sanction issues; Research re: same and virtual trial issues; Draft email to J. Rue re: same	A.E.F.	200.00	4.00	\$800.00
12/20/2021	Further attention to discovery reply brief; legal research re same.	J.D.R.	690.00	2.30	\$1,587.00
12/20/2021	Preparation for final pre-trial discovery conference.	J.D.R.	690.00	2.40	\$1,656.00
12/20/2021	Steering committee meeting; preparation and follow-up to same. Meeting for strategy re witness prep.	J.D.R.	690.00	4.30	\$2,967.00
12/21/2021	Review/Format/Upload Docket Entry re Ltr. Labin to Court re Pre-Trial Conference/Adjournment Request, Fwd to John.	S.D.	150.00	.10	\$15.00
12/21/2021	Updating Calendar/Case Tracking cont.	S.D.	150.00	.10	\$15.00
12/21/2021	Review/Format/Upload Text Orders re Conference Call/Schedule, Cal/E-Mail to John re Conference Call, Updating Calendar/Case Tracking.	S.D.	150.00	.50	\$75.00
12/21/2021	Attention to hearing on Pre-Trial Order; Review pleadings and case documents re: same; Prepare for and attend hearing on Pre-Trial order; Draft Notes re: same; Review email from J. Rue re: same	A.E.F.	200.00	2.00	\$400.00
12/21/2021	Preparation for final pre-trial discovery conference; participation in same; follow-up to same.	J.D.R.	690.00	4.10	\$2,829.00



12/21/2021	Attention and attendance at Pretrial Conference/attention to outstanding matters as a result of same.	S.Q.E.	500.00	1.50	\$750.00
12/22/2021	Review/Format/Upload Docket Entries re Minute Entry/Attorney Correspondence re Adjournment, Fwd to John.	S.D.	150.00	.30	\$45.00
12/22/2021	Attend conference via Zoom with J. Rue re: issues presented by virtual vs. in-person trial related to deference to credibility, etc.; Attention to preparing research strategy re: same; Review email from J. Gran re: same; Review email from J. Rue re: same; Outline research strategy re: same	A.E.F.	200.00	4.00	\$800.00
12/23/2021	Review/Format/Upload Stipulation and Order to Amend Caption, Fwd to John.	S.D.	150.00	.10	\$15.00
12/23/2021	Attention to E-Mails from Hogan re Deadlines, Attention to Calendar re Deadlines.	S.D.	150.00	.10	\$15.00
12/23/2021	Attention to E-Mails w AI re Certification of Service, Attention to Files re Certifications, Sending to AI.	S.D.	150.00	.10	\$15.00
12/23/2021	E-Mails w AI/John re Rule 11 Certification of Service, Preparing Cert/Exhibits, Calls w AI/John re Cert., Finalizing Certification, Sending to AI/John, Texts w AI re Cert. Status.	S.D.	150.00	.60	\$90.00
12/23/2021	E-Mail/Call from AI re Rule 11 Certification of Service, Editing Certification, Call to John re Certification, Completing Certification cont., Gathering Supporting Documents, Sending to John/AI.	S.D.	150.00	.70	\$105.00
12/23/2021	Attention to recent letter filings by parties; update from status conference; Pl. reply brief to Def. Opposition to motion re: deliberative process ruling	L.Q.	500.00	.70	\$350.00
12/23/2021	Attention to Rule 11 Sanction necessary pleadings and certifications; Review pleadings re: same; Multiple telephone conferences with S. Dalrymple re: same; Confer with S. Dalrymple re: drafting of Certification of Motion and Pleadings re: same (safe harbor required service); Review draft of same; Draft additions and changes and finalize same; review final as	A.E.F.	200.00	4.00	\$800.00

signed by S. Dalrymple

12/24/2021	figure out Rule 11 signature changes; scan certified signature from SD	C.W.	150.00	1.00	\$150.00
12/27/2021	JRA filings; receipt of letter and denial of extension; Plaintiff Mtn in Limine - Notice, Briefs and Certification; SUPSEDED State Mtn in Limine - Notice, Order, Brief	C.W.	150.00	1.30	\$195.00
12/27/2021	Attend Conference via Zoom with J. Rue re: issues related to virtual trial including credibility trial court determinations of in person versus virtual testimony; Review pleadings and correspondence re: same; Research re: same	A.E.F.	200.00	4.00	\$800.00
12/27/2021	Attention to steering committee meeting; preparation for and follow-up to same.	J.D.R.	690.00	3.30	\$2,277.00
12/28/2021	Continued research on evidentiary issues related to virtual vs. in person trial testimony	A.E.F.	200.00	2.00	\$400.00
12/29/2021	JRA filings; new dates opposition replies and trial; Set Deadlines as to [291] Amended MOTION in Limine; Ltr fr Defendant requesting new trial date; Ltr from JRA request adjournment date; corrected Ltr from JRA request adjournment date; Request for Adjournment of Deadline to file final PTO	C.W.	150.00	.70	\$105.00
12/29/2021	Continued research on evidentiary issues related to virtual vs. in person trial testimony	A.E.F.	200.00	1.75	\$350.00
12/29/2021	Correspondence with adversary; attention to virtual proceedings issues.	J.D.R.	690.00	1.20	\$828.00
12/30/2021	Attention to recent letter filings by parties and text orders from court re: pre-trial order; adjournment of dates; new trial date and	L.Q.	500.00	.40	\$200.00
12/30/2021	Prepare for, travel to, and attend in person conference with J. Rue re: virtual trial issues and evidentiary issues re: same and witness preparation	A.E.F.	200.00	2.00	\$400.00

12/31/2021	JRA filings; submitting revised joint proposed final pretrial order; new trial date; Plaintiff questions re trial planning; receipt of Plaintiff questions re trial planning	C.W.	150.00	.30	\$45.00
1/3/2022	proofread document--DRAFT Opposition to MIL	C.W.	150.00	1.30	\$195.00
1/3/2022	Attention to contractual agreement among counsel.	J.D.R.	690.00	1.40	\$966.00
1/3/2022	Attention to preparation to cross examining school board attorney witnesses.	J.D.R.	690.00	1.60	\$1,104.00
1/3/2022	Attention to opposition to MiL.	J.D.R.	690.00	1.60	\$1,104.00
1/3/2022	Steering committee meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00
1/4/2022	JRA filings; Notice of Motion; Memorandum in Support of Plaintiffs' Motion for Rule 11 Sanctions; Declaration of JR in suport of Plaintiffs' Motion for Rule 11 Sanctions; Order-Proposed	C.W.	150.00	.30	\$45.00
1/4/2022	Amicus witness prep.	J.D.R.	690.00	1.50	\$1,035.00
1/4/2022	Additional attention to draft Opp to MiL.	J.D.R.	690.00	2.50	\$1,725.00
1/4/2022	Attention to opposition to defendants' motion in limine/drafting ancillary docs/exhibits to same.	S.Q.E.	500.00	2.00	\$1,000.00
1/5/2022	JRA filings; defendants Opposition Brief of Plaintiffs Motion in Limine; DAG Certification of Defendants Opposition; Exhibits of Defendants Opposition; defendants Opposition Brief of Plaintiffs Motion in Limine; DAG Certification of Defendants Opposition; Exhibits of Defendants Opposition	C.W.	150.00	.50	\$75.00

1/5/2022	Telephone conference with J. Rue witness preparation of R. Robinson, DRNJ; Draft email to R. Robinson re: same; Review and respond to email from R. Robinson re: same; Draft email to J. Rue re: same	A.E.F.	200.00	1.00	\$200.00
1/5/2022	Further research on sol / idea.	J.D.R.	690.00	2.50	\$1,725.00
1/5/2022	Attention to draft 56.1 statement.	J.D.R.	690.00	4.50	\$3,105.00
1/6/2022	Attention to analysis of discovery documents.;	J.D.R.	690.00	.60	\$414.00
1/6/2022	Review and draft response to R. Robinson email re: witness preparation conference; Draft email to J. Rue re: same; Prepare for and attend witness preparation conference to prepare R. Robinson for trial testimony; Review and respond to email from R. Robinson re: same and details of ASL interpreter for court appearance; Conference via Zoom with J. Rue re: same and details of witness preparation of R. Robinson going forward; Draft detailed notes re: same	A.E.F.	200.00	2.50	\$500.00
1/6/2022	Attention to service of process on third party witness.	J.D.R.	690.00	.90	\$621.00
1/6/2022	Prep session with Ms. Autin; preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00
1/6/2022	Prep session with Ms. Spar; preparation for and follow-up to same.	J.D.R.	690.00	2.40	\$1,656.00
1/6/2022	Prep session with Mr. Robinson; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
1/7/2022	Telephone conference with J. Rue re: article on virtual trials and issues re: proposed virtual trial; Review article; Preliminary research re: same	A.E.F.	200.00	2.00	\$400.00

1/7/2022	Meeting with potential trial counsel; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
1/7/2022	Meeting with Ms. Canty-Barnes re testimony; preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00
1/7/2022	Attention to docket materials; correspondence to potential trial counsel re same; legal research re trial counsel.	J.D.R.	690.00	3.30	\$2,277.00
1/9/2022	Meeting with potential trial counsel; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
1/10/2022	Meeting with co-counsel re witness prep	J.D.R.	690.00	1.10	\$759.00
1/10/2022	Drafting reply to opp in MiL.	J.D.R.	690.00	1.80	\$1,242.00
1/10/2022	Steering committee meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
1/10/2022	Research virtual jury trial in Stephens v. Monsanto, Case No. 20-585764 and judgment entered in same after verdict for Defendants on December 2021 in order to ascertain any strategies or pitfalls for the conduct of virtual trial; Draft memorandum to J. Rue re: same	A.E.F.	200.00	8.00	\$1,600.00
1/11/2022	Meeting with potential trial counsel re strategy.	J.D.R.	690.00	1.30	\$897.00
1/11/2022	Legal research and analysis of mootness issue in light of statutory efforts to address the delays.	J.D.R.	690.00	2.20	\$1,518.00
1/12/2022	Attend conference via zoom with J. Rue re: onboarding of Attorney Greg Little and various issues re: same	A.E.F.	200.00	.50	\$100.00

1/12/2022	Attention to reply brief re: motion in limine	L.Q.	500.00	.30	\$150.00
1/12/2022	Meeting with potential trial counsel.	J.D.R.	690.00	.80	\$552.00
1/12/2022	Team meeting; follow-up to same.	J.D.R.	690.00	1.80	\$1,242.00
1/12/2022	Review correspondence from J. Rue to G. Little re: various case issues for trial; Review 2/18/2020 transcript on motion to dismiss hearing before Judge Hillman, De#75; Review 5/6/2019 USODE letter to NJDOE re: IDEA noncompliance; Review 2nd Amended Complaint, DE#78; Review Order denying Motion to Dismiss, DE#098; Review Plaintiff's Motion for Summary Judgment, De #243; Review both Motions to Certify both 23(b)(2) and 23(b)(3) classes; Review Final Pre-Trial order; Review Plaintiff's Motion in Limine	A.E.F.	200.00	6.00	\$1,200.00
1/13/2022	JRA filings; notice of sealed transcript of proceedings; Reply brief to Opposition to Motion; Supplemental Certification in support of reply brief; Certificate of Service; Notice of Reply Brief	C.W.	150.00	.50	\$75.00
1/13/2022	phone calls to set up or confirm zoom meetings	C.W.	150.00	1.10	\$165.00
1/13/2022	Prepare for and attend steering committee meeting	A.E.F.	200.00	1.00	\$200.00
1/13/2022	Attention to creation of shadow team.	J.D.R.	690.00	.50	\$345.00
1/13/2022	Attendance at pre-trial conference with Court and post-conference de-brief	L.Q.	500.00	1.20	\$600.00

1/13/2022	Review numerous emails from J. Rue and Plaintiffs Team re: Conference with Judge Hillman and Steering committee; Conference via Zoom with J. Rue re: outcome of Judge's conference and multiple outstanding issues related to summary judgment motion, motion to bifurcate and issues for creation of Shadow Team; Research re: all of the foregoing issues	A.E.F.	200.00	3.00	\$600.00
1/13/2022	Attention to status conf. Zoom call with court; post-call de-brief; updated briefing schedule; req. for pre-trial strategy	L.Q.	500.00	1.30	\$650.00
1/13/2022	Witness prep -- EP. preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
1/13/2022	Preliminary attention to SJ brief.	J.D.R.	690.00	1.60	\$1,104.00
1/13/2022	Attention to motion to bifurcate; legal research re same.	J.D.R.	690.00	1.80	\$1,242.00
1/13/2022	Attendance at conference with Judge Hillman; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
1/14/2022	JRA filing; dates for response	C.W.	150.00	.10	\$15.00
1/14/2022	Time entry September 9, 2021 to current date	L.Q.	500.00	.60	\$300.00
1/14/2022	Call with Mr. Dryzga, AAG. Follow-up to same.	J.D.R.	690.00	1.20	\$828.00
1/14/2022	Attention to settlement strategy and analysis; drafting letter to njdoe re same.	J.D.R.	690.00	3.20	\$2,208.00
1/16/2022	serial communications with team members re revision of contractual terms of collaboration.	J.D.R.	690.00	4.40	\$3,036.00

1/18/2022	JRA filings; Minute Entry for Status Hearing; Letter re reply brief to Opposition to Motion; Certification on behalf of all Defendants re reply brief	C.W.	150.00	.10	\$15.00
1/18/2022	Review all pleadings and orders served today	A.E.F.	200.00	.10	\$20.00
1/18/2022	Call with J.R. regarding status.	W.I.P.	500.00	.50	\$250.00
1/18/2022	Read entire transcript of hearing on Motion to Dismiss (Docket #78)	A.E.F.	200.00	4.00	\$800.00
1/18/2022	Trial prep: Attention to organization of witness materials.	J.D.R.	690.00	2.50	\$1,725.00
1/18/2022	Close attention to opposition to summary judgment briefing.	J.D.R.	690.00	3.30	\$2,277.00
1/18/2022	Attention to trial preparation and strategy; meeting with senior trial team.	J.D.R.	690.00	2.80	\$1,932.00
1/19/2022	Review all pleadings and orders served today	A.E.F.	200.00	.10	\$20.00
1/19/2022	JRA filings; Attorney Certification in Support of Motion; Opposition Brief; letter fr Plaintiffs requesting ext; deadlines for Leave to File Excess Pages Motion; Letter fr Plaintiffs requesting ext for redactions; Certificate of Service; Notice of Motion to File an Overlength Brief	C.W.	150.00	.50	\$75.00
1/19/2022	Call with J.R. and G. Little regarding media strategy.	W.I.P.	500.00	.60	\$300.00
1/19/2022	Continued attention to drafting opposition to NJdoe MSJ	J.D.R.	690.00	1.50	\$1,035.00



1/19/2022	Legal research re class certification.	J.D.R.	690.00	4.80	\$3,312.00
1/19/2022	Preliminary attention to NJDOE opposition. to P Class cert motion (23b2 & 23b3). Related legal research.	J.D.R.	690.00	4.30	\$2,967.00
1/20/2022	Reviewed G.L. v Ligonier Valley for guidance on statute of limitations time frames that apply to this class action	M.P.C.	300.00	1.50	\$450.00
1/20/2022	Strategy and planning re class certification reply briefs.	J.D.R.	690.00	2.50	\$1,725.00
1/20/2022	Trial preparation; witness organization and planning; Attention to trial exhibits.	J.D.R.	690.00	4.80	\$3,312.00
1/21/2022	upload docket items to JRA website	C.W.	150.00	.70	\$105.00
1/21/2022	Attention to docket entries from 1-18-22 including Def. Opposition to Class Certification	L.Q.	500.00	.50	\$250.00
1/21/2022	Preliminary attention to billing records for eventual fee certification.	J.D.R.	690.00	3.30	\$2,277.00
1/21/2022	Further attention to trial planning; master org chart; communications with co-counsel.	J.D.R.	690.00	3.50	\$2,415.00
1/22/2022	Attention to reply brief re 23b2 motion to certify.	J.D.R.	690.00	5.50	\$3,795.00
1/23/2022	Attention to reply brief re 23b2 motion to certify.	J.D.R.	690.00	3.30	\$2,277.00
1/23/2022	Attention to reply brief re 23b3 motion to certify.	J.D.R.	690.00	3.50	\$2,415.00

1/24/2022	JRA filing; Order granting ext to Motion to Seal, redactions relations to Motion for Summary Judgment; Plaintiffs Memorandum, response, supplemental certification, declaration of Counsel; docket text for sealed Certification in Opposition; Opposition Brief, certification of counsel, exhibits, certificate of service	C.W.	150.00	.90	\$135.00
1/24/2022	Team TC re: pro hac vice attorney	L.Q.	500.00	1.00	\$500.00
1/24/2022	Attention to Finalizing 23b3 reply brief.	J.D.R.	690.00	1.20	\$828.00
1/24/2022	Attention to Finalizing SJ Opp brief.	J.D.R.	690.00	1.30	\$897.00
1/24/2022	Meeting with trial counsel; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
1/24/2022	Attention to Finalizing 23b2 reply brief.	J.D.R.	690.00	1.50	\$1,035.00
1/24/2022	Full team meeting re ELC involvement; preparation and followup for same.	J.D.R.	690.00	2.20	\$1,518.00
1/25/2022	JRA filing; Plaintiffs reply memorandum in support of second renewed motion for Rule 23 b 2 and 3; download docket filings and upload to JRA website	C.W.	150.00	.70	\$105.00
1/25/2022	Review of Def. Opposition to Motion for Sanctions, Pl. Opposition to Def. Motion for SJ and SOMF; Support for Pl. 2nd Motion for Class Certification and Def. Opposition to Motion	L.Q.	500.00	1.20	\$600.00
1/25/2022	Legal research re sol issues.	J.D.R.	690.00	1.80	\$1,242.00
1/25/2022	Matter management; planning and prep for meeting with trial counsel; communications with team.	J.D.R.	690.00	1.80	\$1,242.00

1/26/2022	JRA filings; Opposition Brief to Plaintiffs Motion for Partial Summary Judgment; Defendants Response to Plaintiffs Local Rule Statement; Certificate of Service from DAG and upload same to JRA website	C.W.	150.00	.20	\$30.00
1/26/2022	Extended meeting with trial counsel; trial prep.	J.D.R.	690.00	2.50	\$1,725.00
1/27/2022	Prepare PowerPoint Presentation for Case timelines	T.M.N.	150.00	3.00	\$450.00
1/27/2022	attention to Briefing Books; selecting, assembly, organizing Briefing Books; email JR Certifications for review; email GL Briefing Book link	C.W.	150.00	3.00	\$450.00
1/27/2022	Extended meeting with trial counsel; trial prep.	J.D.R.	690.00	1.80	\$1,242.00
1/27/2022	Travel from deep dive meeting with trial counsel. REDUCED BY 50% FOR TRAVEL.	J.D.R.	690.00	4.00	\$2,760.00
1/28/2022	Selecting, assembly, organizing, printing, collating, binding Briefing Books; to USPS to mail Briefing Books	C.W.	150.00	5.30	\$795.00
1/28/2022	trial prep; strategy and planning; attention to trial materials and witness prep.	J.D.R.	690.00	8.20	\$5,658.00
1/29/2022	Attention to docket entries for joint pre-trial order; stipulation fo facts and Pl. reply to Opp. for sanctions	L.Q.	500.00	.40	\$200.00
1/30/2022	Travel for deep dive meeting with trial counsel. REDUCED BY 50% FOR TRAVEL.	J.D.R.	690.00	4.20	\$2,898.00
1/31/2022	JRA filings; Joint Final Pretrial Order w/ and w/o notes; Pretrial Memorandum Stipulated Facts w/ and w/o notes; upload w/o notes versions to website; Plaintiffs Reply Brief to Opposition to Motion and upload to website; calculate page counts of Briefing Books; email JR with same; JRA filings; docket text incorrect	C.W.	150.00	1.00	\$150.00

submission

1/31/2022	All day meetings with trial counsel, preparation for trial.	J.D.R.	690.00	11.50	\$7,935.00
2/1/2022	print cases for GL; prepare cases for mailing; to USPS with Cases for GL; JRA filings; Plaintiffs Reply Memorandum in Support of Motion for Summary Judgment, Supplemental Certification w Exhibits in Support of Motion for Summary Judgment; Defendants Reply Brief to support Motion for Summary Judgment, DAG Klika Certificate of Service; upload to website	C.W.	150.00	1.20	\$180.00
2/1/2022	Attention to review of replies to parties' motions for SJ; notation for trial	L.Q.	500.00	.50	\$250.00
2/1/2022	All day meetings with trial counsel, preparation for trial.	J.D.R.	690.00	10.80	\$7,452.00
2/2/2022	TC re: pre-trial assignments	L.Q.	500.00	1.00	\$500.00
2/2/2022	All day meetings with trial counsel, preparation for trial.	J.D.R.	690.00	8.50	\$5,865.00
2/3/2022	phone call w/ES re: printing Briefing Books in SC and getting to GL; researching and contacting printer in the area; discussing print job; collecting documents and emailing documents and print request to USP Store; receiving and getting approval for print estimate; booking print job; scan subpoenas; email to JR for further action; scan Notice of Subpoenas; call from UPS store w/ ETA of print job; email JR and ES with information; phone call from UPS store re: print job finished; call ES w/ info for GL and email JR and ES; payment attempt to UPS store; scan checks for Notice for Subpoenas; upload Notices and checks to Sharepoint; email ES and TN with info	C.W.	150.00	4.20	\$630.00

2/4/2022	download JR Zoom meeting; check files; email JR; (2) phone calls fr JR; upload Zoom meeting to Sharepoint	C.W.	150.00	.40	\$60.00
2/4/2022	Attention to team assignment to identify best/worst documents for trial; correspondence re: same	L.Q.	500.00	.40	\$200.00
2/4/2022	Settlement call with NJDOE; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
2/4/2022	Strategy and planning for trial; coordination of team; team meeting; preparation for and follow-up to same.	J.D.R.	690.00	3.60	\$2,484.00
2/5/2022	Calls with trial counsel; key team members; attention to timelines and documents.	J.D.R.	690.00	4.30	\$2,967.00
2/6/2022	Calls with trial counsel; key team members; attention to timelines and documents.	J.D.R.	690.00	3.80	\$2,622.00
2/8/2022	Call with S.Edwards regarding pre-trial media strategy.	W.I.P.	500.00	.20	\$100.00
2/8/2022	Review joint pre-trial and stip of facts	L.Q.	500.00	.30	\$150.00
2/8/2022	JRA filings; Plaintiffs Motion for entry GL; Statement in Lieu of Brief re Motion; Rue Certification in Support of Application; Little Certification in Support of Application; Proposed Order Granting Admission; Joint Final Pretrial Order; Stipulated Facts; upload files to website; print documents for GL; set up FedEx shipping; to FedEx with documents for GL; JRA filings; Plaintiff Ltr re pre hearing conference; upload to website	C.W.	150.00	2.00	\$300.00
2/8/2022	Legal research; summary of key cases and authorities for trial counsel.	J.D.R.	690.00	3.20	\$2,208.00

2/8/2022	Drafting and filing pro hac application for Mr. Little; attention to drafting and filing letter to Court re pre-trial conference; correspondence with adversary re same; further attention to witness timelines; consultation with team members re trial strategy.	J.D.R.	690.00	4.40	\$3,036.00
2/9/2022	Attention to witness preparation.	J.D.R.	690.00	1.60	\$1,104.00
2/10/2022	Call with PLM and J.R, E.S., and S.E. regarding pretrial marketing and public relations.	W.I.P.	500.00	.60	\$300.00
2/10/2022	Meetings with vendors re support for trial.	J.D.R.	690.00	1.30	\$897.00
2/10/2022	Attention to review of documents to complete team assignment - identify best documents for trial	L.Q.	500.00	2.00	\$1,000.00
2/10/2022	Meeting with amici counsel; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
2/10/2022	Drafting letter to Judge Hillman re conference.	J.D.R.	690.00	1.50	\$1,035.00
2/10/2022	Further attention to analysis of strengths and weaknesses of overall case.	J.D.R.	690.00	1.70	\$1,173.00
2/10/2022	Attention to trial preparation, planning and analysis of strengths and weaknesses.	J.D.R.	690.00	3.30	\$2,277.00
2/10/2022	Meeting with team members re individual assignments. Preparation for and follow-up to same.	J.D.R.	690.00	4.50	\$3,105.00
2/10/2022	Attention to correspondence with Judge's chambers re. 2/14/22 pretrial conference/review of next steps in light of same.	S.Q.E.	500.00	.50	\$250.00

2/11/2022	JRA filings; Plaintiff Ltr re conference clarification and upload to website	C.W.	150.00	.20	\$30.00
2/11/2022	Drafting letter to Judge Hillman.	J.D.R.	690.00	1.10	\$759.00
2/11/2022	Attention to review of documents to complete team assignment - identify worst documents for trial	L.Q.	500.00	1.70	\$850.00
2/11/2022	Meeting with trial counsel re trial planning and strategy; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
2/11/2022	Attention to "opp research" re timelines per individual plaintiffs.	J.D.R.	690.00	1.50	\$1,035.00
2/11/2022	Attention to Chambers outreach re. 2/14/22 pretrial conference/correspondence re. same/attention to Defendant's Rule 56.1 exhibits/correspondence re. same/attorneys contact information.	S.Q.E.	500.00	1.80	\$900.00
2/12/2022	Travel for final pretrial conference (adjourned). TRAVEL BILLED AT 50% (9 hours travel).	J.D.R.	690.00	4.50	\$3,105.00
2/13/2022	Attention to drafting summary of team assignment and findings	L.Q.	500.00	.80	\$400.00
2/13/2022	Legal research re partial success theories; Attention to strategies and preparation for pretrial hearing scheduled for 2/14	K.H.	550.00	2.30	\$1,265.00
2/13/2022	Preparation for final pre-trial conference (adjourned).	J.D.R.	690.00	5.50	\$3,795.00
2/14/2022	JRA filings; Docket Text Order adjournment of pretrial conference and trial, new dates; email TN with dates; upload to website; JRA filing; Plaintiffs Ltr re date for streamlining trial; Plaintiffs Ltr re motion to seal documents	C.W.	150.00	.50	\$75.00

2/14/2022	Final pretrial conference (adjourned); preparation and follow-up to same; legal strategy; team meetings.	J.D.R.	690.00	9.50	\$6,555.00
2/15/2022	Pulled documents from casefile to be sent to G Little	D.B.	150.00	4.30	\$645.00
2/15/2022	Review pending motion briefs in preparation for pretrial conference; trial preparation.	J.D.R.	690.00	5.60	\$3,864.00
2/16/2022	Printing, assembly, binding Pending Motions and Exhibits books; drive to FedEx and pack Pending Motions book to ship; JRA filings; Docket Text Notice Deadline for First Motion for Leave to Appear; email TN; upload to website	C.W.	150.00	4.80	\$720.00
2/16/2022	In person meeting with CP; follow up to same.	J.D.R.	690.00	2.10	\$1,449.00
2/16/2022	Travel back from final pre-trial conference. TRAVEL BILLED AT 50% (9.2 hours).	J.D.R.	690.00	4.60	\$3,174.00
2/17/2022	Call with SBC; follow up to same.	J.D.R.	690.00	.60	\$414.00
2/17/2022	Call with DO; follow up to same.	J.D.R.	690.00	1.20	\$828.00
2/17/2022	Call with team re meet and confer with Labin; follow-up to same in individual calls.	J.D.R.	690.00	1.80	\$1,242.00
2/17/2022	Further attention to trial strategy and planning re choice of witnesses, and client issues arising from same.	J.D.R.	690.00	1.90	\$1,311.00
2/18/2022	Attention to docket entries from 2-11-22 through 2-18-22	L.Q.	500.00	.40	\$200.00



2/18/2022	Multiple telephone conferences with J. Rue re: issue of fee award in class action and various issues related to same for research; Draft email to J. Rue summarizing understanding of assignment; Review and respond to email from J. Rue re: same; Draft email to D. Bailey re: same; Conference via zoom with D. Bailey re: same	A.E.F.	200.00	2.00	\$400.00
2/18/2022	Preparation for final pretrial conference; review of filed materials; meetings with team members.	J.D.R.	690.00	5.70	\$3,933.00
2/21/2022	Further attention to draft proposed final order.	J.D.R.	690.00	1.20	\$828.00
2/21/2022	Preparation for final pre-trial conference.	J.D.R.	690.00	2.50	\$1,725.00
2/21/2022	50% BILLING FOR TRAVEL (real travel time 8 hours).	J.D.R.	690.00	4.00	\$2,760.00
2/22/2022	JRA filings; Ltr fr Plaintiff re streamline case; Docket Text Order pretrial conference time; Defendants Opp Brief re Little; Certificate of Service-Labin; upload to website	C.W.	150.00	.30	\$45.00
2/22/2022	Attention to Pre-trial Conf. with Court; post-conf team debrief	L.Q.	500.00	1.40	\$700.00
2/22/2022	Attendance at final pre-trial conference; preparation and followup to same; several extended meetings with trial counsel.	J.D.R.	690.00	9.50	\$6,555.00
2/23/2022	Attention to Def. Opposition to and Pl. support of pro hac vice	L.Q.	500.00	.20	\$100.00
2/23/2022	Telephone conference with J. Rue re: issue related to the availability of damages for (b)(3) class; Organize notes re: same	A.E.F.	200.00	.70	\$140.00
2/23/2022	Attention to legal research and strategy re b3 class certification and notice issues.	J.D.R.	690.00	1.50	\$1,035.00

2/23/2022	Further attention to strategy and planning re supplemental discovery.	J.D.R.	690.00	1.80	\$1,242.00
2/23/2022	TRAVEL BILLED AT 50% (8 hours real travel time)	J.D.R.	690.00	4.00	\$2,760.00
2/24/2022	Conference with counsel for amici; preparation for and follow-up to same.	J.D.R.	690.00	1.40	\$966.00
2/24/2022	Legal research re 23b3 notice requirements.	J.D.R.	690.00	1.80	\$1,242.00
2/25/2022	Attention to drafting letter to Judge Hillman; communications with adversary; legal research re 23b3 issues.	J.D.R.	690.00	2.50	\$1,725.00
2/28/2022	Communications with Eric Harrison, witness for NJDOE.	J.D.R.	690.00	.40	\$276.00
2/28/2022	status meeting; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
3/2/2022	Call with J.R. regarding status of case and publicity strategy.	W.I.P.	500.00	.10	\$50.00
3/2/2022	Corresponded with John re fact research on who attended class action clients Due Process scheduling hearings	M.P.C.	300.00	.20	\$60.00
3/2/2022	Reviewed and researched Finding of Fact for class action clients Due Process scheduling conferences	M.P.C.	300.00	.50	\$150.00
3/2/2022	Spoke with John re research about which attorneys were present for scheduling calls, review files	M.P.C.	300.00	.75	\$225.00
3/2/2022	Attention to privilege issues re attorney testimony.	J.D.R.	690.00	1.60	\$1,104.00

3/2/2022	Hearing prep; assignments; review of briefing and authorities.	J.D.R.	690.00	4.30	\$2,967.00
3/2/2022	Attention to correspondence with J. Hillman re. confirmation of public access for 3/8/22 oral argument.	S.Q.E.	500.00	.40	\$200.00
3/3/2022	Followed up with John re who attended class action clients Due process scheduling conferences	M.P.C.	300.00	.10	\$30.00
3/3/2022	emails with Beth re scheduling research	M.P.C.	300.00	.20	\$60.00
3/3/2022	Call with John re research	M.P.C.	300.00	.25	\$75.00
3/3/2022	Preparation for oral argument on all motions; meetings with each team member assigned to argue; attention to briefs and legal authorities.	J.D.R.	690.00	6.40	\$4,416.00
3/3/2022	Attention to drafting memo re. School Law Committee comments by ALJs which may impact expedited recovery/attention to oral argument on 3/8/2022 covering of motions and correspondence with the Court re. same	S.Q.E.	500.00	2.00	\$1,000.00
3/4/2022	ZOOM with Beth re Casefox research for class action clients Due Process scheduling conferences	M.P.C.	300.00	.50	\$150.00
3/4/2022	Zoom with Beth re scheduling research	M.P.C.	300.00	.50	\$150.00
3/4/2022	Class Action Motion Meeting re assignments	T.M.N.	150.00	1.50	\$225.00
3/4/2022	Researched reporters to engage with regarding pretrial hearing and trial; Drafted emails to those reporters; Call and emails with J.R. regarding same.	W.I.P.	500.00	1.50	\$750.00

3/4/2022	Attention to team meeting to prep for motion hearing	L.Q.	500.00	1.50	\$750.00
3/4/2022	Researched for Finding of Facts re class action client's Due Process scheduling conferences	M.P.C.	300.00	2.75	\$825.00
3/4/2022	Research to determine what attorneys were present for scheduling calls	M.P.C.	300.00	2.75	\$825.00
3/4/2022	Team meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.40	\$1,656.00
3/4/2022	Review motion in limine briefing and cited authority.	J.D.R.	690.00	3.60	\$2,484.00
3/5/2022	Attention to TC with JDR and initial review of case timelines for Summary Judgement motion argument	L.Q.	500.00	.40	\$200.00
3/5/2022	Review class certification briefing and legal authority.	J.D.R.	690.00	4.30	\$2,967.00
3/6/2022	Emailed reporters regarding 3/8 hearing and opportunity to attend via Zoom.	W.I.P.	500.00	.60	\$300.00
3/6/2022	Review R 11 briefing and legal authority; review PI #1 briefing and legal authority.	J.D.R.	690.00	4.50	\$3,105.00
3/7/2022	Emails with J.R. regarding media outreach concerning March 8 hearing.	W.I.P.	500.00	.20	\$100.00
3/7/2022	Meeting with trial counsel and co-counsel re sanctions motion.	J.D.R.	690.00	1.50	\$1,035.00
3/7/2022	Team meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00

3/7/2022	Review summary judgment briefs and legal authority.	J.D.R.	690.00	2.50	\$1,725.00
3/7/2022	Review briefing of PI #2 and legal authority.	J.D.R.	690.00	3.50	\$2,415.00
3/8/2022	Emails with J.R. regarding 3/8 hearing; Emails C. Sitrin of Politico regarding same.	W.I.P.	500.00	.20	\$100.00
3/8/2022	Reviewed Adam X v. NJDOE and Charles H v. DC cases. Research attorney's fees, class certification, injunctions, and violations of injunctions.	D.M.F.	300.00	2.30	\$690.00
3/8/2022	Attention to discovery letter to Judge Hillman; consultations with co-counsel re same.	J.D.R.	690.00	1.50	\$1,035.00
3/8/2022	Attention to USBNJ Motion hearing via Zoom	L.Q.	500.00	2.50	\$1,250.00
3/8/2022	Attendance at oral argument for all pending motions; preparation for and follow up to same.	K.H.	550.00	3.60	\$1,980.00
3/8/2022	Attend oral argument on all pending motions; preparation for and follow-up to same.	J.D.R.	690.00	6.50	\$4,485.00
3/8/2022	Internal meeting re oral argument and needed follow up	K.H.R.	550.00	.80	\$440.00
3/9/2022	Brief Charles H v. DC and Adam X v. NJDOE and	D.M.F.	300.00	1.00	\$300.00
3/9/2022	Further attention to drafting letter to Judge Hillman.	J.D.R.	690.00	1.20	\$828.00
3/9/2022	Attention to legal research and analysis of issues related to enforcement of injunction against the state.	J.D.R.	690.00	2.40	\$1,656.00

3/9/2022	Attention to post hearing strategy, review and revise draft letter to court	K.H.R.	550.00	1.40	\$770.00
3/10/2022	Attention to review and comment on draft letter re: discovery	L.Q.	500.00	.20	\$100.00
3/10/2022	Supplemental discovery strategy and planning; attention to finalizing letter to Judge Hillman.	J.D.R.	690.00	3.30	\$2,277.00
3/11/2022	Attention to letter from C. Labin to Court; attention to drafting responsive letter.	J.D.R.	690.00	2.50	\$1,725.00
3/12/2022	Draft letter to Judge Hillman.	J.D.R.	690.00	1.10	\$759.00
3/12/2022	Review defendant's letter to court, Attention to strategy re responding to same	K.H.R.	550.00	1.50	\$825.00
3/13/2022	Call to discuss letter to Judge Hillman; finalize and file letter.	J.D.R.	690.00	.80	\$552.00
3/17/2022	Attention to strategy and planning re 30b6 depositions.	J.D.R.	690.00	1.30	\$897.00
3/18/2022	Close attention to draft deposition notice for NJDOE 30b6.	J.D.R.	690.00	1.60	\$1,104.00
3/21/2022	Attention to strategy and planning re supplemental discovery; legal research re scope of 30b6 second time around. Finalizing and sending correspondence to opposing counsel re depositions.	J.D.R.	690.00	3.50	\$2,415.00
3/22/2022	Meeting with co-counsel re order of proof, and trial planning.	J.D.R.	690.00	.60	\$414.00

3/22/2022	Planning session with trial counsel.	J.D.R.	690.00	.80	\$552.00
3/22/2022	Close attention to Hillman opinions in related cases.	J.D.R.	690.00	2.20	\$1,518.00
3/23/2022	Attendance at discovery meeting with J.R/Thurston/ G. Little.	S.Q.E.	500.00	.70	\$350.00
3/23/2022	Attention to coordination between various related cases.	J.D.R.	690.00	.80	\$552.00
3/23/2022	Preliminary attention to confidentiality issues across cases.	J.D.R.	690.00	1.10	\$759.00
3/23/2022	Close attention to new Hillman opinions from related cases.	J.D.R.	690.00	2.50	\$1,725.00
3/25/2022	Attention to recent 3d Cir/DNJ IDEA authority.	J.D.R.	690.00	1.50	\$1,035.00
3/29/2022	Attention to ordering transcript of proceedings.	J.D.R.	690.00	.30	\$207.00
3/29/2022	Drafting letter to C. Labin re coordination of discovery with CP case.	J.D.R.	690.00	1.20	\$828.00
3/30/2022	Attention to potential discovery violations and consideration of necessary follow up discovery	K.H.R.	550.00	.50	\$275.00
3/31/2022	Review of related cases.	S.Q.E.	500.00	.40	\$200.00
3/31/2022	Organizing and analyzing potentially relevant cases and authorities	T.M.N.	150.00	4.00	\$600.00

3/31/2022	Further attention to coordinating discovery with related cases.	J.D.R.	690.00	1.20	\$828.00
3/31/2022	Preliminary attention to Judge Hillman decisions in related cases.	J.D.R.	690.00	1.50	\$1,035.00
3/31/2022	Attention to organization of case coordination materials re related cases.	J.D.R.	690.00	1.50	\$1,035.00
4/1/2022	Organizing and analyzing potentially relevant cases and authorities	T.M.N.	150.00	2.00	\$300.00
4/1/2022	Attention to reviewing status of related cases and compiling the same.	S.Q.E.	500.00	1.20	\$600.00
4/1/2022	Review outline for depo. Attended depo of Mr. Rota. Took copious notes.	D.M.F.	300.00	3.50	\$1,050.00
4/1/2022	Attend depo of Mr. Rota. Took copious notes.	D.M.F.	300.00	4.00	\$1,200.00
4/1/2022	Preparation for, attendance at, and followup to deposition of Rota.	J.D.R.	690.00	8.80	\$6,072.00
4/2/2022	Attention to compiling excel spreadsheet re. related cases.	S.Q.E.	500.00	.50	\$250.00
4/3/2022	Attention to summarizing and checking status of related cases/compiling same into excel spreadsheet.	S.Q.E.	500.00	.70	\$350.00
4/4/2022	Download and save docket sheet	T.M.N.	150.00	.50	\$75.00
4/4/2022	Draft memo recapping Mr. Rota's Deposition	M.C.	300.00	2.00	No Charge



4/4/2022	Draft memo recapping Mr. Rota's Deposition	D.M.F.	300.00	2.50	\$750.00
4/4/2022	Consultation with NFP stakeholder in lawsuit; call with DAG Labin re confidentiality order; follow-up to same.	J.D.R.	690.00	1.80	\$1,242.00
4/4/2022	Finalization of compilation re. related cases/submission to J.R. of same.	S.Q.E.	500.00	.40	\$200.00
4/5/2022	Attention to team discussions of case and current example of ALJ push for settlement and misunderstanding of 45-day rule	L.Q.	500.00	.30	\$150.00
4/5/2022	Attention to preparation for NJDOE 30b6 deposition.	J.D.R.	690.00	2.30	\$1,587.00
4/6/2022	Organizing and analyzing potentially relevant cases and authorities	T.M.N.	150.00	1.00	\$150.00
4/6/2022	Review analysis of Rota transcript, discussion re strategy relating to same	K.H.R.	550.00	1.70	\$935.00
4/7/2022	Further attention to materials to be reviewed at 30b6 deposition.	J.D.R.	690.00	4.30	\$2,967.00
4/8/2022	30b6 deposition; preparation for and follow-up to same. Attention to reviewing and revising DF memo to file re Moscowitz deposition.	J.D.R.	690.00	8.50	\$5,865.00
4/10/2022	Attention to recent filings with the court and recent case timelines re: 45 day violations by ALJs	L.Q.	500.00	.30	\$150.00
4/11/2022	Preliminary attention to supporting materials for Bass 30b6 deposition.	J.D.R.	690.00	.80	\$552.00
4/11/2022	Review of Cost and Fees agreement; preliminary analysis of cross-firm pro formas	K.H.R.	550.00	3.00	\$1,650.00

4/12/2022	Prep for moscowitz deposition.	J.D.R.	690.00	1.50	\$1,035.00
4/13/2022	Review multiple emails from J. Rue re: testimony of ALJ in deposition and use of Pennsylvania due process procedure development of New Jersey procedures re: same; Multiple telephone conferences with J. Rue same	A.E.F.	200.00	1.00	\$200.00
4/13/2022	Draft letter to Court re mediation.	J.D.R.	690.00	1.20	\$828.00
4/13/2022	Preliminary attention to comparison of PA guidelines to NJ proposed guidelines.	J.D.R.	690.00	1.50	\$1,035.00
4/13/2022	Moscowitz deposition; preparation for and follow-up to same.	J.D.R.	690.00	6.50	\$4,485.00
4/13/2022	Review and revise draft letter to court	K.H.R.	550.00	.40	\$220.00
4/14/2022	E-filing	T.M.N.	150.00	.20	\$30.00
4/15/2022	E-filing	T.M.N.	150.00	.10	\$15.00
4/15/2022	Team meeting re mediation issues.	J.D.R.	690.00	1.00	\$690.00
4/18/2022	Attend conference via Zoom with S. Edwards re: research similarities/differences between NJ and PA due process hearing procedures; Review and respond to email from J. Rue re: same	A.E.F.	200.00	.20	\$40.00
4/18/2022	Review letter dated 1/24/2020 from J. Rue to Judge Hillman re: NJ proposed due process procedures and attachments thereto including proposed Due process Hearing Guidelines; Draft notes of issues presented re: same	A.E.F.	200.00	.60	\$120.00

4/18/2022	Review email correspondence from J. Rue re: issue re: similarity/differences between NJ and PA due process hearing procedure; Review Memorandum of Law in Support of Plaintiffs' Second Motion for Preliminary Injunction; Draft notes re: issues and citations presented therein re: problems with proposed NJ due process procedure	A.E.F.	200.00	1.10	\$220.00
4/18/2022	Review PA 2019 Special Education Due Process Hearings A Guide for Parents; Draft Notes re: same	A.E.F.	200.00	1.20	\$240.00
4/18/2022	Research re: comparison of NJ and PA Due Process hearing procedures including review of "Due Process Hearings under IDEA; Justice Delayed" Admin.Law.Review (73:4) (2021) by Holben & Zirkel; Review Uniform Pre-Hearing Directions dated February 2020 by Pennsylvania Office for Dispute Resolution for Due prices Hearings; Draft research notes	A.E.F.	200.00	1.40	\$280.00
4/18/2022	Meeting with co-counsel re status and developments.	J.D.R.	690.00	1.20	\$828.00
4/18/2022	Call with co-counsel re settlement strategy.	J.D.R.	690.00	1.30	\$897.00
4/18/2022	Attention to recent authorities re damages.	J.D.R.	690.00	1.50	\$1,035.00
4/19/2022	Attention to comparison of Pennsylvania and New Jersey Due Process Hearing procedures	A.E.F.	200.00	1.00	\$200.00
4/19/2022	Prepare for, travel to, and attend in-person conference with J. Rue re: mediation related issues per Order from Judge Hillman re: same, New Jersey due process hearing defects compared to Pennsylvania, and related trial preparation issues; Draft notes memorializing same	A.E.F.	200.00	1.50	\$300.00
4/19/2022	Attention to settlement strategy; drafting letter to court.	J.D.R.	690.00	1.80	\$1,242.00

4/20/2022	Attention to developments in settlement talks.	J.D.R.	690.00	.50	\$345.00
4/20/2022	Continued attention to attention to comparison of Pennsylvania and New Jersey Due Process Hearing procedures; Review email correspondence from J. Rue re: same and pleadings and correspondence to the Court re: inadequacies of New Jersey due process hearing procedures; Initial review of Pennsylvania "Understanding Special Education Due Process Hearings, A Guide for Patents" 2019; Review New Jersey Proposed Due Process Hearing procedures; Perform preliminary research re: Pennsylvania Procedures for Due Process	A.E.F.	200.00	5.50	\$1,100.00
4/21/2022	Legal research re settlement issues.	J.D.R.	690.00	2.20	\$1,518.00
4/21/2022	Continued attention to comparison of Pennsylvania and New Jersey Due Process Hearing procedures; Complete review of Pennsylvania "Understanding Special Education Due Process Hearings, A Guide for Patents" 2019; Draft Notes re: same; Complete Research re: Pennsylvania Due Process procedure; Obtain Pennsylvania Uniform Pre-Hearing Directions (2020) re: same; Review same; Draft Notes re: same; Compare foregoing Pennsylvania documents to New Jersey Proposed Due Process Hearing procedures; Obtain Pennsylvania Special Education Dispute Manual 2009; Verify with Pennsylvania Dispute Resolution that this was latest available Manual and inquire about obtaining copy of draft manual under review; Draft document comparing Pennsylvania vs. New Jersey Due Process procedures and forward same to J. Rue	A.E.F.	200.00	8.00	\$1,600.00
4/22/2022	Attention to settlement issues; drafting settlement strategy memorandum.	J.D.R.	690.00	3.50	\$2,415.00
4/25/2022	Further attention to settlement strategy.	J.D.R.	690.00	1.50	\$1,035.00

4/25/2022	Preliminary attention to transcript of 30b6 deposition.	J.D.R.	690.00	2.20	\$1,518.00
4/25/2022	Review and analysis of Ehling transcript; attention to strategy and follow up to same	K.H.R.	550.00	2.20	\$1,210.00
4/26/2022	Travel to and attend conference with J. Rue re: various issues related to settlement; Draft notes re: same; Attention to research re: analogous class action consent decrees and settlement agreements	A.E.F.	200.00	1.00	\$200.00
4/26/2022	Attention to review of D. Fleming pro hac vice application.	S.Q.E.	500.00	.40	\$200.00
4/26/2022	Draft Pro hac vice documents	D.M.F.	300.00	2.00	\$600.00
4/27/2022	E-filing	T.M.N.	150.00	.10	\$15.00
4/27/2022	Attention to preparation for agreed settlement conference between all parties; Review internal memorandum outlining various issues presented re: same; Draft outline of issues presented by Consent Decree enforcement	A.E.F.	200.00	2.00	\$400.00
4/27/2022	Research re: Consent Decrees and Settlement Agreements in Federal Class Actions involving enforcement and fees for same post-Consent Decree	A.E.F.	200.00	5.00	\$1,000.00
4/27/2022	Attention to settlement issues; drafting settlement strategy memorandum.	J.D.R.	690.00	3.30	\$2,277.00
4/27/2022	Further attention to drafting memorandum re settlement; call with co-counsel re same; legal research re same.	J.D.R.	690.00	3.30	\$2,277.00
4/28/2022	Attention to Fleming pro hac application.	J.D.R.	690.00	.30	\$207.00

4/28/2022	Attention to revising pro hac vice application of Dylan Fleming, Esq.	S.Q.E.	500.00	.60	\$300.00
4/28/2022	Research: pull information from PACER	T.M.N.	150.00	2.00	\$300.00
4/28/2022	Continued attention to researching and compiling consent decrees and settlement agreements in analogous class action cases; Review and respond to various emails from T. Nutter re: Consent Decrees downloaded from PACER; Review Consent Decrees from analogous cases	A.E.F.	200.00	3.00	\$600.00
4/28/2022	Attend conference via zoom with J. Rue re: legal effect of motion to vacate or protective order on properly served subpoena for deposition and notice of same; Draft notes re: same; Review memorandum and research from other class counsel re: same; Conduct further research re: same; Draft memorandum with case quotes and citations re: same	A.E.F.	200.00	4.00	\$800.00
4/28/2022	Attention to coordinating related cases; documenting status of each; communications with co-counsel.	J.D.R.	690.00	2.20	\$1,518.00
4/29/2022	Download docket for AI	T.M.N.	150.00	.50	\$75.00
4/29/2022	Continued attention to researching and compiling consent decrees and settlement agreements in analogous class action cases; Review and respond to email from T. Nutter re: Consent Decrees downloaded from PACER; Review Consent Decree and several attachments from IDEA case of K.B. v. BOE of Greece W.D. NY 2007	A.E.F.	200.00	3.00	\$600.00
4/29/2022	Attention to review of CADRE IDEA annual dispute resolution data of various state educational agencies as reported to OSEP; Review various other data and other reports on CADRE website as related to performance of other states compared to NJ on due process petitions and other related dispute resolution	A.E.F.	200.00	3.00	\$600.00

4/29/2022	Attention to settlement strategy.	J.D.R.	690.00	1.50	\$1,035.00
4/29/2022	Attention to legal research re Rule 45 issues re subpoena for Candice Hendricks	J.D.R.	690.00	1.60	\$1,104.00
4/29/2022	Close attention to NJDOE proposed procedural guidelines, to inform proposal for revision in settlement discussions.	J.D.R.	690.00	2.50	\$1,725.00
5/2/2022	E-filing	T.M.N.	150.00	.10	\$15.00
5/2/2022	Further attention to settlement strategy; calls with co-counsel to discuss plan for settlement conference; legal research re same.	J.D.R.	690.00	3.50	\$2,415.00
5/2/2022	Review and analysis Moscowitz transcript; attention to strategy and follow up to same	K.H.R.	550.00	2.20	\$1,210.00
5/3/2022	E-filing	T.M.N.	150.00	.60	\$90.00
5/3/2022	Communications with counsel for amici; follow-up to same.	J.D.R.	690.00	1.20	\$828.00
5/3/2022	Attention to drafting and revising letter to USMJ Skahill.	J.D.R.	690.00	1.50	\$1,035.00
5/3/2022	Attention to strategy and planning re mediation and settlement discussions.	J.D.R.	690.00	1.90	\$1,311.00
5/3/2022	Legal research re third party standing to enforce settlement, absent class cert.	J.D.R.	690.00	2.50	\$1,725.00
5/3/2022	Attention to drafting and revising initial demand letter, as required by USMJ Skahill	J.D.R.	690.00	2.50	\$1,725.00

5/4/2022	Attention to Cadre research/organization of same with A. Ford.	S.Q.E.	500.00	.40	\$200.00
5/4/2022	Legal research re enforcement of settlement without certification.	J.D.R.	690.00	4.50	\$3,105.00
5/5/2022	Finalization memo/submission of same to J.R. for review.	S.Q.E.	500.00	1.00	\$500.00
5/5/2022	Attention to prior deposition of Hendricks.	J.D.R.	690.00	2.20	\$1,518.00
5/5/2022	Draft demand letter and revise per comments from co-counsel.	J.D.R.	690.00	3.80	\$2,622.00
5/5/2022	Attention to strategy re dispute resolution monitoring; Review and revise and strategy related to settlement demand for Judge Skahill	K.H.R.	550.00	2.70	\$1,485.00
5/6/2022	Research 5-day rule.	D.M.F.	300.00	3.00	\$900.00
5/6/2022	Start pulling docket sheets for related case project	T.M.N.	150.00	.20	\$30.00
5/6/2022	Team meeting re: strategies for 5/11 proceeding and settlement proposal	L.Q.	500.00	1.00	\$500.00
5/6/2022	Attention to drafting letter to Judge Skahill re discovery issues; revision of same per co-counsel comments.	J.D.R.	690.00	2.50	\$1,725.00
5/6/2022	Further attention to drafting and revising demand letter.	J.D.R.	690.00	3.20	\$2,208.00
5/8/2022	Prep for Bass deposition	J.D.R.	690.00	3.50	\$2,415.00



5/9/2022	Attention to related cases research.	S.Q.E.	500.00	.60	\$300.00
5/9/2022	Research 5-day rule.	D.M.F.	300.00	3.00	\$900.00
5/9/2022	Attention to settlement communication	L.Q.	500.00	.20	\$100.00
5/9/2022	Project- related cases, pulled docket for each case, added opinion column, and provided hyperlink to each case docket	T.M.N.	150.00	3.00	\$450.00
5/9/2022	further attention to drafting demand letter.	J.D.R.	690.00	2.80	\$1,932.00
5/10/2022	E-filing	T.M.N.	150.00	.10	\$15.00
5/10/2022	Corrected fee schedule for Al, Tara, and Matthew	M.A.	82.50	.90	\$74.25
5/10/2022	Conference with Judge Skahill; preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
5/10/2022	Attention to strategy re OAL delay tactics	K.H.R.	550.00	.40	\$220.00
5/11/2022	E-filing	T.M.N.	150.00	.30	\$45.00
5/11/2022	Attention to team de-brief of recent depositions and 5/11/22 court proceeding	L.Q.	500.00	.50	\$250.00
5/11/2022	Attention to pro hac application materials; communications with adversary re same.	J.D.R.	690.00	.50	\$345.00

5/11/2022	Further attention to draft proposed guidelines.	J.D.R.	690.00	.80	\$552.00
5/11/2022	Bass deposition; attend, prepare and follow-up to same;	J.D.R.	690.00	6.50	\$4,485.00
5/11/2022	Continue analysis of cross-firm pro formas	K.H.R.	550.00	1.50	\$825.00
5/12/2022	Research 5-day rule.	D.M.F.	300.00	2.00	\$600.00
5/13/2022	E-filing	T.M.N.	150.00	.90	\$135.00
5/13/2022	Corrected fee schedule for Krista, John, and Don	M.A.	82.50	2.70	\$222.75
5/13/2022	Consultation with counsel for amici re settlement; consultation with co-counsel re same.	J.D.R.	690.00	3.30	\$2,277.00
5/16/2022	E-filing	T.M.N.	150.00	.10	\$15.00
5/16/2022	Corrected fee schedule for Saran, Wayne, Frank and Johanna	M.A.	82.50	2.50	\$206.25
5/16/2022	Close attention to settlement strategy; drafting internal confidential analysis; consultation with counsel for amici and co-counsel re same.	J.D.R.	690.00	4.80	\$3,312.00
5/17/2022	E-filing	T.M.N.	150.00	.20	\$30.00
5/17/2022	Corrected fee schedule for Anne, Claire, Darryl, Saraya, and started on Sean	M.A.	82.50	2.50	\$206.25

5/17/2022	Attention to coordination issues re related cases.	J.D.R.	690.00	2.30	\$1,587.00
5/18/2022	Corrected fee schedule for Sean	M.A.	82.50	2.50	\$206.25
5/19/2022	E-filing	T.M.N.	150.00	.10	\$15.00
5/20/2022	Download current docket and send updated documents to Greg	T.M.N.	150.00	.50	\$75.00
5/20/2022	Attention to review of recent court filings and calendar trial notice	L.Q.	500.00	.20	\$100.00
5/20/2022	Corrected fee schedule for Anna, Latiah, Clinton, Sara, Kenneth, Michelle, and Eric	M.A.	82.50	1.20	\$99.00
5/20/2022	Attention to coordination with related cases.	J.D.R.	690.00	3.30	\$2,277.00
5/23/2022	Attention to coordination with related cases.	J.D.R.	690.00	2.60	\$1,794.00
5/24/2022	Further attention to proposed guidelines, as potential opportunity for traction in settlement.	J.D.R.	690.00	1.90	\$1,311.00
5/24/2022	Discovery conference before Judge Skahill; preparation for and follow-up to same.	J.D.R.	690.00	3.50	\$2,415.00
5/25/2022	E-filing	T.M.N.	150.00	.10	\$15.00
5/25/2022	Further attention to coordination of discovery issues.	J.D.R.	690.00	1.80	\$1,242.00

5/25/2022	Attention to coordination between CP and related cases (all).	J.D.R.	690.00	4.50	\$3,105.00
5/26/2022	Further attention to procedural guidelines.	J.D.R.	690.00	1.10	\$759.00
5/26/2022	Attention to legal research re class certification and post-judgment enforcement.	J.D.R.	690.00	3.30	\$2,277.00
5/27/2022	Preliminary attention to mediation statement.	J.D.R.	690.00	1.80	\$1,242.00
5/27/2022	Detailed consultation with steering committee and counsel for amici re settlement issues; follow-up with wider team.	J.D.R.	690.00	4.50	\$3,105.00
5/30/2022	Attention to settlement strategy	K.H.R.	550.00	2.50	\$1,375.00
5/31/2022	E-filing from e-courts	T.M.N.	150.00	.10	\$15.00
5/31/2022	Attention to review of Plaintiff Demand Letter, team discussion and recent court filings	L.Q.	500.00	.40	\$200.00
5/31/2022	Communications with court re settlement conference; further attention to confidential settlement statement.	J.D.R.	690.00	2.50	\$1,725.00
6/1/2022	Further attention to drafting and revising settlement conference confidential statement.	J.D.R.	690.00	3.50	\$2,415.00
6/2/2022	Attention to NJDOE settlement counter proposal and team review	L.Q.	500.00	.30	\$150.00
6/2/2022	Attention to finalizing settlement memorandum for Judge Skahill.	J.D.R.	690.00	3.80	\$2,622.00

6/2/2022	Review and analysis of defendants' settlement proposal	K.H.R.	550.00	2.30	\$1,265.00
6/3/2022	Attention to team discussion of settlement strategy	L.Q.	500.00	.30	\$150.00
6/3/2022	Settlement strategy; planning for settlement conference; attention to drafting materials.	J.D.R.	690.00	.50	\$345.00
6/3/2022	Preparation for settlement conference; conferences with co-counsel; legal research re attorneys' fees.	J.D.R.	690.00	5.80	\$4,002.00
6/3/2022	Attention to settlement strategy	K.H.R.	550.00	1.00	\$550.00
6/6/2022	Close attention to settlement materials from Adam X.	J.D.R.	690.00	2.30	\$1,587.00
6/6/2022	Travel for settlement conference (BILLED AT HALF)	J.D.R.	690.00	5.00	\$3,450.00
6/6/2022	Review and analysis of Bass transcript; attention to strategy re follow up to same	K.H.R.	550.00	2.00	\$1,100.00
6/7/2022	Analysis of invoices from each firm in preparation for settlement conference; attention to Adam X and team strategy discussions	K.H.	550.00	3.60	\$1,980.00
6/7/2022	Attention to pro forma analysis in preparation for settlement conference	K.H.R.	550.00	4.00	\$2,200.00
6/8/2022	Call with ACLU-NJ; preparation for and followup to same.	J.D.R.	690.00	1.50	\$1,035.00
6/8/2022	Conference call re settlement; preparation for and follow up to same	K.H.	650.00	2.00	\$1,300.00

6/8/2022	Full team meeting planning for settlement conference; preparation for and follow-up to same.	J.D.R.	690.00	2.80	\$1,932.00
6/8/2022	Review of related class action settlement in Adam X for participation at settlement discussion meeting/Attendance at same.	S.Q.E.	500.00	1.40	\$700.00
6/9/2022	E-filing	T.M.N.	150.00	.10	\$15.00
6/9/2022	Preparation for settlement conference before Judge Skahill, attendance at same; followup to same.	J.D.R.	690.00	11.50	\$7,935.00
6/9/2022	Further attn to master pro forma	K.H.R.	550.00	1.00	\$550.00
6/10/2022	Travel for settlement conference (BILLED AT HALF)	J.D.R.	690.00	5.00	\$3,450.00
6/13/2022	E-filing	T.M.N.	150.00	.10	\$15.00
6/13/2022	Attention to team billing records.	J.D.R.	690.00	.50	\$345.00
6/14/2022	Attention to drafting settlement proposal; calls with co-counsel re same.	J.D.R.	690.00	3.50	\$2,415.00
6/15/2022	Trial prep.	J.D.R.	690.00	1.80	\$1,242.00
6/15/2022	Legal research re discrete issues re settlement of class claims; further attention to drafting proposal.	J.D.R.	690.00	4.50	\$3,105.00
6/16/2022	Call w/ Krista re class action fee conversion	M.A.	82.50	.50	\$41.25

6/16/2022	Attention to master financial issues and settlement strategy; discussions with team re necessary data	K.H.	550.00	1.70	\$935.00
6/16/2022	Attention to discovery in related cases; legal research re notice of settlement.	J.D.R.	690.00	5.50	\$3,795.00
6/17/2022	Started converting PDF fee invoices to Excel sheets	M.A.	82.50	1.00	\$82.50
6/20/2022	Further attention to research and drafting settlement proposal; consultations with co-counsel; consultation with counsel for amici.	J.D.R.	690.00	4.50	\$3,105.00
6/20/2022	Discussion with clients re case status	K.H.R.	550.00	.60	\$330.00
6/21/2022	Attention to settlement strategy and draft proposal, including legal research and collaboration with team regarding specific concerns	K.H.	550.00	2.80	\$1,540.00
6/21/2022	Further attention to drafting and revising settlement proposal; related legal research.	J.D.R.	690.00	6.60	\$4,554.00
6/22/2022	Converted multiple fee documents and invoices to Excel spreadsheets	M.A.	82.50	3.00	\$247.50
6/22/2022	Attention to settlement offer; strategy and planning; team management issues.	J.D.R.	690.00	4.20	\$2,898.00
6/23/2022	Finalized settlement proposal; letter to Judge Skahill.	J.D.R.	690.00	2.80	\$1,932.00
6/23/2022	Attention to strategy re settlement and correspondence relating to same	K.H.R.	550.00	1.50	\$825.00
6/24/2022	Legal research re scope of release; fiduciary duty to absent members of the class.	J.D.R.	690.00	2.50	\$1,725.00

6/27/2022	Attention to settlement strategy; discussions re same with co-counsel; team management issues; review of recent authority regarding class certification.	J.D.R.	690.00	4.20	\$2,898.00
6/28/2022	Attention to settlement strategy; discussions re same with co-counsel.	J.D.R.	690.00	.80	\$552.00
6/30/2022	Attention to finalizing ex parte settlement proposal; communications with co-counsel re same.	J.D.R.	690.00	4.50	\$3,105.00
7/1/2022	Review of recent third circuit authority; team management issues.	J.D.R.	690.00	2.20	\$1,518.00
7/6/2022	Attention to strategy re defendant delay tactics	K.H.R.	550.00	1.00	\$550.00
7/7/2022	E-filing	T.M.N.	150.00	.10	\$15.00
7/7/2022	Update docket with missing documents and download updated docket sheet	T.M.N.	150.00	.10	\$15.00
7/7/2022	Attention to drafting letter to Judge Hillman.	J.D.R.	690.00	3.20	\$2,208.00
7/12/2022	Drafting letter to Judge Skahill re settlement; consultation with co-counsel re same.	J.D.R.	690.00	2.50	\$1,725.00
7/12/2022	Attention to B3 strategy	K.H.R.	550.00	2.00	\$1,100.00
7/13/2022	Further attention to settlement strategy; legal research re notice requirement for a B3 class.	J.D.R.	690.00	3.20	\$2,208.00
7/13/2022	Internal conference re B3 strategy; preparation for and follow up to same	K.H.R.	550.00	3.00	\$1,650.00



7/14/2022	Meeting with vendor; preparation and follow-up to same.	J.D.R.	690.00	.70	\$483.00
7/18/2022	E-filing	T.M.N.	150.00	.10	\$15.00
7/18/2022	Attention to communications with counsel for amici, co-counsel, settlement strategy and planning.	J.D.R.	690.00	4.50	\$3,105.00
7/18/2022	Attention to B3 strategy, trial prep issues, and communications with amici	K.H.R.	550.00	3.00	\$1,650.00
7/19/2022	John / Greg	J.D.R.	690.00	1.00	\$690.00
7/20/2022	Consultations with counsel for amici; legal research re class certification.	J.D.R.	690.00	2.20	\$1,518.00
7/20/2022	Meeting with Jenny Valverde, preparation for and follow up to same; meeting with team re trial prep issues	K.H.R.	650.00	2.30	\$1,495.00
7/21/2022	Attention to strategy for settlement conference	K.H.R.	550.00	.60	\$330.00
7/22/2022	Attention to cumulative pro forma and preparation for settlement conference	K.H.R.	550.00	3.00	\$1,650.00
7/25/2022	Print and compile all depositions and exhibits for Krista	T.M.N.	150.00	.50	\$75.00
7/25/2022	[EXTERNAL] C.P. et al v. New Jersey Department of Education et al, 19-12807, (NLH), Continuation of Settlement Conference	J.D.R.	690.00	2.00	\$1,380.00
7/25/2022	Settlement conference with Judge Skahill; preparation for and follow up to same	K.H.R.	550.00	5.00	\$2,750.00

7/26/2022	Drafting letter to USMJ re settlement.	J.D.R.	690.00	2.50	\$1,725.00
7/27/2022	Email all attorney's re settlement letter	T.M.N.	150.00	.20	\$30.00
7/27/2022	CP: Trial prep schedule (travel planning) & expenses	J.D.R.	690.00	1.00	\$690.00
7/27/2022	Further attention to letter to USMJ re settlement; finalizing and sending same.	J.D.R.	690.00	2.20	\$1,518.00
7/28/2022	Trial Prep- Print, bind, and label depositions	T.M.N.	150.00	1.50	\$225.00
7/28/2022	John / Greg conference call	J.D.R.	690.00	1.00	\$690.00
7/29/2022	John / Greg: Trial graphics, trial logistics, settlement strategy	J.D.R.	690.00	1.00	\$690.00
7/29/2022	Preparation and follow-up to conference with Mr. Little re various matters.	J.D.R.	690.00	1.50	\$1,035.00
7/29/2022	Bind and complete table of contents for Depositions for Krista	T.M.N.	150.00	1.00	\$150.00
8/1/2022	Attention to recent developments in USDOE investigation in related matter.	J.D.R.	690.00	1.50	\$1,035.00
8/2/2022	Legal research re settlement of class actions in DNJ; close analysis of materials from other Hillman cases.	J.D.R.	690.00	4.50	\$3,105.00
8/3/2022	Further attention to settlement issues; close review of prior Hillman settlement approvals.	J.D.R.	690.00	2.50	\$1,725.00

8/12/2022	Review of deposition transcripts and related docs in preparation for trial	K.H.R.	550.00	2.70	\$1,485.00
8/15/2022	Review and analysis of Bass deposition transcripts in preparation for trial	K.H.R.	550.00	5.80	\$3,190.00
8/15/2022	Team meeting to discuss MM testimony / subpoena; preparation for and follow-up to same.	J.D.R.	690.00	1.60	\$1,104.00
8/15/2022	Internal conference re trial issues and scheduling; preparation for and follow up to same	K.H.R.	550.00	1.50	\$825.00
8/16/2022	Review & analysis of Moskowitz deposition in preparation for trial	K.H.R.	550.00	2.50	\$1,375.00
8/16/2022	Meeting with SBC to update on case, discuss testimony at trial. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
8/16/2022	Meeting with trial counsel for trial planning and settlement strategy. Preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00
8/16/2022	Attention to scheduling witness prep.	J.D.R.	690.00	.30	\$207.00
8/16/2022	Review of depositions in preparation for trial, specifically plaintiff depositions	K.H.R.	550.00	4.70	\$2,585.00
8/16/2022	Meeting with SBC re testimony; preparation for and follow up to same	K.H.R.	550.00	2.30	\$1,265.00
8/17/2022	SPAN conference (Ehling keynote). Followup to same.	J.D.R.	690.00	4.50	\$3,105.00
8/17/2022	Witness prep and client update: AS. Preparation for and follow-up to same.	J.D.R.	690.00	3.30	\$2,277.00

8/17/2022	Witness prep and client update: D.O. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
8/18/2022	Call with trial counsel, trial planning and settlement strategy; preparation and follow-up to same.	J.D.R.	690.00	1.20	\$828.00
8/18/2022	Review DOE and OAL depositions and related discovery in preparation for trial	K.H.R.	550.00	6.30	\$3,465.00
8/18/2022	Review deposition transcripts and plaintiff related paper discovery	K.H.R.	550.00	2.50	\$1,375.00
8/19/2022	E-filing	T.M.N.	150.00	.20	\$30.00
8/19/2022	Call with trial counsel; trial prep and settlement strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
8/19/2022	Close attention to opinion certifying the class.	J.D.R.	690.00	3.50	\$2,415.00
8/19/2022	Communications with clients and amici (through counsel) re certification decision.	J.D.R.	690.00	2.60	\$1,794.00
8/19/2022	Attention to Class Certification Decisions and team discussion	L.Q.	500.00	.60	\$300.00
8/19/2022	Review and analysis of class certification decision, attn to strategy of trials issue relating to same	K.H.R.	550.00	3.50	\$1,925.00
8/19/2022	Review of Judge Hillman's Order granting Class Certification.	S.Q.E.	500.00	.30	\$150.00
8/20/2022	Further attention to trial prep, witness prep & settlement strategy. preparation for and follow- up to same.	J.D.R.	795.00	2.50	\$1,987.50

8/21/2022	Attention to pre trial matters post class cert decision	K.H.R.	550.00	1.30	\$715.00
8/21/2022	Attention to ongoing trial strategy and ideas regarding potential settlement proposals	K.H.R.	550.00	1.50	\$825.00
8/22/2022	Attention to MM withdrawal; meeting with co-counsel; preparation and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
8/22/2022	Reviewed class action certification order.	T.E.E.	400.00	.50	No Charge
8/22/2022	Created class counsel e-mail for JRA, posted class certification decision press release on JRA website	M.A.	82.50	1.00	\$82.50
8/22/2022	Internal meeting re trial strategy and prep, and issues relating to certification of the class; preparation for and follow up to same	K.H.R.	550.00	3.00	\$1,650.00
8/22/2022	Attention to press release re. latest case developments/correspondence re. same.	S.Q.E.	500.00	.50	\$250.00
8/23/2022	Intake calls re class action; taking info, answering questions, transferring entries from the website to word docs for sharepoint	M.A.	82.50	1.00	\$82.50
8/23/2022	Call with trial counsel; trial planning and settlement strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
8/23/2022	Press interview. Preparation for and follow-up to same.	J.D.R.	690.00	1.40	\$966.00
8/23/2022	Continue prep for testimony of plaintiff witnesses, including discussions with clients and team re witness selection	K.H.R.	550.00	2.70	\$1,485.00
8/23/2022	Meeting with trial team; preparation for and follow up to same	K.H.R.	550.00	3.50	\$1,925.00

8/24/2022	Trial strategy meeting	T.E.E.	400.00	1.00	No Charge
8/24/2022	Meeting is whole team	T.M.N.	150.00	1.00	\$150.00
8/24/2022	Intake [Kennedy]	T.M.N.	150.00	.45	\$67.50
8/24/2022	Team meeting; trial prep; settlement strategy -- preparation for and follow-up to same.	J.D.R.	690.00	3.90	\$2,691.00
8/24/2022	Call with trial 2-chair; trial prep & settlement strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.20	\$828.00
8/24/2022	Call with trial counsel re trial prep and settlement strategy; close analysis of class certification decision. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
8/24/2022	Press interview. Preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
8/24/2022	TC with team to discuss class certification and trial preparation	L.Q.	500.00	1.00	\$500.00
8/24/2022	Internal meeting re trial strategy, preparation for and follow up to same	K.H.R.	550.00	1.50	\$825.00
8/25/2022	Intake [Kleinbeck]	T.M.N.	150.00	1.20	\$180.00
8/25/2022	Call with Coyle Law Group re trial prep and strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.60	\$1,104.00
8/25/2022	Call with RCGZ re trial prep and strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.60	\$1,104.00

8/25/2022	Call with lead trial counsel re trial prep and strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.60	\$1,104.00
8/26/2022	Review of discovery relative to SBC direct testimony.	K.H.R.	550.00	1.70	\$935.00
8/26/2022	Meeting with Coyle Law Group. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
8/26/2022	Call with Coyle Law Group re trial prep, settlement strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
8/26/2022	Call with counsel for amici -- discussion of settlement issues and strategy. Preparation for and follow-up to same.	J.D.R.	690.00	1.60	\$1,104.00
8/26/2022	Attention to trial prep and strategy re same	K.H.R.	550.00	3.00	\$1,650.00
8/27/2022	Compare and document whether KR exhibits are on pre-trial exhibit list or not, make notes re same and e-mail back to KR	M.A.	82.50	2.00	\$165.00
8/27/2022	Multiple calls with named plaintiffs re current status. Preparation for and follow-up to same.	J.D.R.	690.00	4.50	\$3,105.00
8/27/2022	Trial prep. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
8/27/2022	Trial team meeting re witness strategy	K.H.R.	550.00	1.50	\$825.00
8/29/2022	Continue working on KR exhibit list	M.A.	82.50	1.00	\$82.50
8/29/2022	Participation in witness preparation; preparation for and follow up to same	K.H.R.	550.00	2.00	\$1,100.00

8/29/2022	Communications with Gibbons about CP case.	J.D.R.	690.00	.50	\$345.00
8/29/2022	Attention to proposed findings of fact and conclusions of law.	J.D.R.	690.00	1.50	\$1,035.00
8/29/2022	YHS: meeting with client re testimony; Zoom meeting with client; preparation for and follow up to same	J.D.R.	690.00	3.10	\$2,139.00
8/30/2022	E-filing	T.M.N.	150.00	.10	\$15.00
8/30/2022	Review and comment on proposed pretrial findings of fact and conclusions of law	K.H.R.	550.00	1.30	\$715.00
8/30/2022	Attention to proposed trial exhibits for SBC	K.H.R.	550.00	.50	\$275.00
8/30/2022	Review correlated SBC exhibits	K.H.R.	550.00	.70	\$385.00
8/30/2022	REview and edit draft response to DOE letter to Court; Strategy and co-counsel communication re same	K.H.R.	550.00	.70	\$385.00
8/30/2022	Participation in pretrial witness preparation; prepare and follow up to same	K.H.R.	550.00	2.70	\$1,485.00
8/30/2022	Meeting with Gibbons re class action. Preparation for and follow-up to same.	J.D.R.	690.00	2.30	\$1,587.00
8/30/2022	Communications with adversary about negotiation and compromise.	J.D.R.	690.00	1.20	\$828.00
8/30/2022	Valverde witness prep; attention to published materials.	J.D.R.	690.00	4.20	\$2,898.00



8/30/2022	Calls with trial counsel and RCGZ re trial prep and settlement strategy.	J.D.R.	690.00	2.20	\$1,518.00
8/30/2022	Attention to drafting letter to court.	J.D.R.	690.00	2.50	\$1,725.00
8/30/2022	SBC meeting with client; preparation for and follow up to same	J.D.R.	690.00	3.30	\$2,277.00
8/30/2022	Review correspondence from opposing counsel, review and revise response to same	K.H.R.	550.00	1.00	\$550.00
8/30/2022	File letter for John	T.M.N.	150.00	.20	\$30.00
8/31/2022	Review and analyze defendant's proposed pretrial findings of fact and conclusions of law; attention to strategy re same	K.H.R.	550.00	1.50	\$825.00
8/31/2022	Pull dockets and documents for John 20-8001 and 2:18-cv-10528 re Motion to Seal	T.M.N.	150.00	1.00	\$150.00
8/31/2022	E-filing	T.M.N.	150.00	.10	\$15.00
8/31/2022	Calls with trial counsel and other co-counsel re trial prep and settlement strategy.	J.D.R.	690.00	3.30	\$2,277.00
8/31/2022	Legal research re motion for interlocutory appeal.,	J.D.R.	690.00	4.50	\$3,105.00
9/1/2022	E-filing	T.M.N.	150.00	.30	\$45.00
9/1/2022	Attention to strategy for upcoming hearing dates	K.H.R.	550.00	2.30	\$1,265.00

9/1/2022	Review Court's decision re summary judgment; follow up strategy, analysis and team discussions	K.H.R.	550.00	3.50	\$1,925.00
9/1/2022	Meeting with team to discuss communication with Court. Preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00
9/1/2022	Calls with various team members re strategy and planning.	J.D.R.	690.00	2.20	\$1,518.00
9/1/2022	Drafting letter to Judge Hillman re mediation and trial adjournment, for consideration by NJDOE	J.D.R.	690.00	2.80	\$1,932.00
9/1/2022	Close review of SJ opinion.	J.D.R.	690.00	3.50	\$2,415.00
9/1/2022	Attention to team discussion re: possible settlement and trial prep; review Judge Hillman decisions denying both parties' Motions for Summary Judgement and ensuing team discussion	L.Q.	500.00	.80	\$400.00
9/2/2022	Attention to potential mediation strategy; confer with co-counsel re strategies for next week's appearances; review pretrial and in limine motions	K.H.R.	550.00	3.70	\$2,035.00
9/2/2022	First meeting B3 steering committee. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
9/2/2022	Further attention to securing mediation services from CJ Zazzali.	J.D.R.	690.00	1.50	\$1,035.00
9/2/2022	Draft and submit letter to Judge Hillman	J.D.R.	690.00	.80	\$552.00
9/2/2022	Communications with counsel for amici.	J.D.R.	690.00	.50	\$345.00

9/2/2022	Attention to strategy and planning with various team members; trial prep.	J.D.R.	690.00	3.50	\$2,415.00
9/2/2022	Preliminary review of NJDOE motion brief in support of interlocutory appeal.	J.D.R.	690.00	2.20	\$1,518.00
9/5/2022	Attention to preparation for pretrial conference and strategy re potential settlement options	K.H.R.	550.00	1.70	\$935.00
9/5/2022	Attention to settlement strategy; legal research re due process hearing guidelines.	J.D.R.	690.00	3.60	\$2,484.00
9/5/2022	Attention to 3d Circuit briefing; legal research re same.	J.D.R.	690.00	4.40	\$3,036.00
9/5/2022	Further attention to appellate briefing; legal research re same.	J.D.R.	690.00	5.30	\$3,657.00
9/6/2022	Review DOE draft brief re interlocutory appeal; Review and revise draft opposition brief	K.H.R.	550.00	1.50	\$825.00
9/6/2022	Participate via telephone in post-hearing conference with DOE ; follow up to same	K.H.R.	550.00	.80	\$440.00
9/6/2022	E-filing	T.M.N.	150.00	.10	\$15.00
9/6/2022	Download 3rd circuit cases re Rule 23 (f) interlocutory appeals for John	T.M.N.	150.00	.60	\$90.00
9/6/2022	Conf. Call with D.C. Judge Pre-trial matters	T.E.E.	400.00	1.10	No Charge
9/6/2022	Call with counsel for amici. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00

9/6/2022	Preliminary attention to Third Circuit brief; legal research re same.	J.D.R.	690.00	3.80	\$2,622.00
9/6/2022	Additional attention to comments on proposed guidelines, in anticipation of mediation and settlement talks.	J.D.R.	690.00	2.50	\$1,725.00
9/6/2022	Attention to strategy re amici involvement and ongoing witness and trial prep	K.H.R.	550.00	2.70	\$1,485.00
9/7/2022	Conference call w/Judge re; Motions in Limine	T.E.E.	400.00	1.00	No Charge
9/7/2022	E-filing	T.M.N.	150.00	.20	\$30.00
9/7/2022	Extended discussion of procedural guidelines, for purposes of settlement negotiations.	J.D.R.	690.00	3.50	\$2,415.00
9/7/2022	Additional discussion of procedural guidelines.	J.D.R.	690.00	2.70	\$1,863.00
9/8/2022	Drafting letter to Judge Hillman. Legal research on notice; preparation for meet and confer with NJDOE re same.	J.D.R.	690.00	5.20	\$3,588.00
9/9/2022	E-filing	T.M.N.	150.00	.10	\$15.00
9/9/2022	Further attention to appellate brief; legal research re same.	J.D.R.	690.00	5.60	\$3,864.00
9/9/2022	Trial and witness prep	K.H.R.	550.00	3.00	\$1,650.00
9/9/2022	Attention to Ellison Pro Hac Vice application materials.	S.Q.E.	500.00	.40	\$200.00

9/10/2022	Further attention to third circuit brief; legal research re same.	J.D.R.	690.00	4.20	\$2,898.00
9/12/2022	Review case docket for adjournments and trial dates.	T.E.E.	400.00	1.50	No Charge
9/12/2022	Attention to opposition to motion for interlocutory appeal.	J.D.R.	690.00	4.50	\$3,105.00
9/12/2022	Call with C. Labin re class notice; preparation for and follow-up to same.	J.D.R.	795.00	2.60	\$2,067.00
9/12/2022	Legal research re notice requirements.	J.D.R.	690.00	3.30	\$2,277.00
9/12/2022	Assist Catherine with filing Brief in 3rd circuit	T.M.N.	150.00	.50	\$75.00
9/12/2022	Attention to strategy re bifurcation notice and other pre-trial issues	K.H.R.	550.00	2.00	\$1,100.00
9/12/2022	Attention 3rd Cir. Response to Defs'. Motion to stay.	S.Q.E.	500.00	.40	\$200.00
9/13/2022	Attention to legal research re class notice; attention to communications with C. Labin; drafting letter to Judge Hillman.	J.D.R.	690.00	3.70	\$2,553.00
9/13/2022	Documentation of communications re class notice, for purposes of motion practice; strategy and planning.	J.D.R.	690.00	1.20	\$828.00
9/13/2022	Steering committee meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.30	\$1,587.00
9/13/2022	Further attention to appellate brief; legal research re same.	J.D.R.	690.00	3.60	\$2,484.00

9/13/2022	Strategy and planning.	J.D.R.	690.00	3.60	\$2,484.00
9/13/2022	E-filing	T.M.N.	150.00	.50	\$75.00
9/13/2022	Attention to issues re proposed notice	K.H.R.	550.00	1.50	\$825.00
9/14/2022	Conf Call with Attorney's re Opposition Motion to Stay & Bifurcation	T.E.E.	400.00	1.00	No Charge
9/14/2022	Prep Cert for Motion in Opposition to Motion to Stay	T.E.E.	400.00	1.50	No Charge
9/14/2022	Searched/gathered all correspondence to J. Hillman from 9-14-21 to present	T.E.E.	400.00	1.50	No Charge
9/14/2022	Pull information for John (Correspondence to Judge from 9-14-21 to 9-14-22, DOE letters to Judge, transcripts from in-person hearings	T.M.N.	150.00	2.00	\$300.00
9/14/2022	Attention to opposition to stay in District Court; legal research re same; case management.	J.D.R.	690.00	6.50	\$4,485.00
9/14/2022	Further attention to procedural guidelines, for settlement purposes.	J.D.R.	690.00	2.60	\$1,794.00
9/14/2022	Attention to strategy re defendants motion to stay; preparation for and follow up to same	K.H.R.	550.00	2.40	\$1,320.00
9/15/2022	Reviewed exhibits and emails re MIO to MTS	T.E.E.	400.00	.50	No Charge
9/15/2022	Email to CA attorneys Draft Certification	T.E.E.	400.00	.10	No Charge

9/15/2022	Reviewed MIO to MTS	T.E.E.	400.00	1.00	No Charge
9/15/2022	Further attention to opposition to stay; attention to certification re same; legal research and drafting same.	J.D.R.	690.00	6.90	\$4,761.00
9/15/2022	Attention to research and drafting related to severance and/or bifurcation.	J.D.R.	690.00	2.50	\$1,725.00
9/16/2022	Attention to settlement communications; detailed email to adversary.	J.D.R.	690.00	2.50	\$1,725.00
9/16/2022	Reviewed 2/20 Hearing Transcript for Trial Prep	T.E.E.	400.00	1.50	No Charge
9/16/2022	Further attention to brief in support of severance/bifurcation; legal research re same.	J.D.R.	690.00	3.50	\$2,415.00
9/16/2022	Trial team meeting re witness strategy, exhibits, and trial theme; preparation for and follow up to same	K.H.R.	550.00	2.50	\$1,375.00
9/17/2022	Further attention to drafting submission re severance; legal research re same	J.D.R.	690.00	1.80	\$1,242.00
9/17/2022	Close attention to defendant's witness list; witness interview; trial strategy & planning	J.D.R.	690.00	2.50	\$1,725.00
9/17/2022	Attention to trial strategy re updated witness list	K.H.R.	550.00	1.80	\$990.00
9/18/2022	Preliminary attention to drafting letter to Judge Hillman, per court order.	J.D.R.	690.00	2.60	\$1,794.00
9/18/2022	Further attention to drafting letter to Judge Hillman; strategy and planning; attention to legal research re notice.	J.D.R.	690.00	5.50	\$3,795.00

9/18/2022	Attention to strategy re pleading in light of recent case and strategy developments	K.H.R.	550.00	1.00	\$550.00
9/19/2022	E-file letter	T.M.N.	150.00	.20	\$30.00
9/19/2022	E-filing	T.M.N.	150.00	.20	\$30.00
9/19/2022	Hearing before Judge Hillman (Zoom); preparation for and follow-up to same.	J.D.R.	690.00	8.80	\$6,072.00
9/19/2022	Witness interview (Harrison); preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
9/19/2022	Review and propose revisions to pre-trial order	K.H.R.	550.00	1.30	\$715.00
9/20/2022	Reviewed transcript of 9/21 hearing for trial prep	T.E.E.	400.00	1.50	No Charge
9/20/2022	e-filing	T.M.N.	150.00	.30	\$45.00
9/21/2022	Attention to notice issues & correspondence from AG re database; attention to issues relating to communication with class members and triaging same.	K.H.R.	550.00	1.70	\$935.00
9/21/2022	Attention to potential mediation and related considerations	K.H.R.	550.00	.50	\$275.00
9/21/2022	Reviewed transcript of hearing held on 12-21-21 for trial prep.	T.E.E.	400.00	2.00	No Charge
9/21/2022	Update docket	T.M.N.	150.00	.20	\$30.00



9/21/2022	Research postcards re Notice and email to Don	T.M.N.	150.00	1.00	\$150.00
9/21/2022	Attention to notice issues; legal research re same; attention to revising draft form.	J.D.R.	690.00	5.60	\$3,864.00
9/21/2022	Trial prep.	J.D.R.	690.00	3.50	\$2,415.00
9/21/2022	Attention to issues re notice and witness prep	K.H.R.	550.00	3.50	\$1,925.00
9/22/2022	Attention to prep for cross-examination of DOE witnesses	K.H.R.	550.00	3.20	\$1,760.00
9/22/2022	Caucus with mediator; Attendance at initial mediation session; preparation for and follow-up to same.	J.D.R.	690.00	5.80	\$4,002.00
9/22/2022	Email companies re Notice mailing	T.M.N.	150.00	.50	\$75.00
9/23/2022	Further attention to notice issue; call with adversary re same; drafting letter to Judge Hillman re deposition related to same; legal research re same.	J.D.R.	690.00	6.90	\$4,761.00
9/23/2022	Close attention to settlement strategy.	J.D.R.	690.00	4.50	\$3,105.00
9/23/2022	E-file letter	T.M.N.	150.00	.20	\$30.00
9/23/2022	Team meeting re trial prep and strategy	L.Q.	500.00	1.50	\$750.00
9/23/2022	Team meeting re trial prep and strategy & preparation for same	K.H.R.	550.00	1.50	\$825.00

9/23/2022	Internal strategy discussions re notice, witness prep, and trial order; follow-up attention relating to mediation that occurred on 9/22, including potential settlement concepts	K.H.R.	550.00	4.00	\$2,200.00
9/26/2022	Combine Memo and Exhibit into PDF per John's instructions	T.M.N.	150.00	.50	\$75.00
9/26/2022	E-filing	T.M.N.	150.00	.20	\$30.00
9/26/2022	Travel to mediation (time adjusted to reflect travel from Princeton office)	J.D.R.	690.00	2.00	\$1,380.00
9/26/2022	Preparation for mediation.	J.D.R.	690.00	2.50	\$1,725.00
9/26/2022	Communications with mediator.	J.D.R.	690.00	1.10	\$759.00
9/26/2022	Attention to third circuit filing and potential settlement discussions	K.H.R.	550.00	2.00	\$1,100.00
9/27/2022	Reviewed Order Granting in Part Petition for Leave to Appeal	T.E.E.	400.00	.10	\$40.00
9/27/2022	Print and bind remaining parent Depositions for Krista (10) print exhibits for Sweeten and Brown	T.M.N.	150.00	3.00	\$450.00
9/27/2022	Travel to mediation (time adjusted to reflect travel from Princeton office)	J.D.R.	690.00	2.00	\$1,380.00
9/27/2022	Participate in mediation; preparation for and follow-up to same.	J.D.R.	690.00	7.50	\$5,175.00
9/28/2022	Attention to data analysis and documentation for KHR relative to accumulated fees for all counsel	M.A.	82.50	4.00	\$330.00

9/28/2022	Cancel flights and hotel reservations	T.M.N.	150.00	.50	\$75.00
9/28/2022	Call with counsel for amici re settlement negotiations. Preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
9/28/2022	Attention to trial prep, review of exhibits.	J.D.R.	690.00	3.20	\$2,208.00
9/28/2022	Attention to drafting letter to counsel for J.A. re common issues.	J.D.R.	690.00	2.50	\$1,725.00
9/28/2022	Continue analysis of various firms pro formas and aggregation; attention to settlement issues	K.H.R.	550.00	4.00	\$2,200.00
9/29/2022	Discussed research issues for stay in Third Circuit.	T.E.E.	400.00	.50	\$200.00
9/29/2022	Research Evans v. Jeff, D. case. Research issue of "simultaneous negotiations".	T.E.E.	400.00	2.50	\$1,000.00
9/29/2022	Sweeten exhibits (create table of contents, cover sheet and bind)	T.M.N.	150.00	1.50	\$225.00
9/29/2022	E-filing	T.M.N.	150.00	.20	\$30.00
9/29/2022	Attention to drafting narrowed class definitions, in pursuit of compromise with NJDOE. Legal research re same.	J.D.R.	690.00	3.20	\$2,208.00
9/29/2022	Call with Mr. Wasserman re status and developments.	J.D.R.	690.00	.70	\$483.00
9/29/2022	Call with Ms. Reisman re status and developments.	J.D.R.	690.00	1.10	\$759.00

9/29/2022	Call with Mr. Little re status and developments.	J.D.R.	690.00	.60	\$414.00
9/29/2022	Call with Mr. Soutar re status and developments.	J.D.R.	690.00	.60	\$414.00
9/29/2022	Attention to class action pro forma re Reisman, O'Leary, Gran, & Thurston. Send out e-mails to Dwyer, Little, and Wasserman re pro forma help, set up meetings re same	M.A.	82.50	5.00	\$412.50
9/30/2022	Brown-Crandoll exhibits (create table of contents, cover sheet, and bind)	T.M.N.	150.00	2.00	\$300.00
9/30/2022	Call with co-counsel re fee sharing. Preparation for and follow-up to same.	J.D.R.	690.00	2.70	\$1,863.00
9/30/2022	Further attention to drafting narrowed class allegations; legal research; communication with mediator re same.	J.D.R.	690.00	1.80	\$1,242.00
9/30/2022	Drafting letter to mediator re settlement.	J.D.R.	690.00	2.40	\$1,656.00
9/30/2022	Attention to class action pro formas	M.A.	82.50	3.00	\$247.50
9/30/2022	Attention to finalizing Ellison Pro Hac Vice docs/correspondence re. same.	S.Q.E.	500.00	.30	\$150.00
10/1/2022	Careful attention to settlement considerations, issues and variables; communications with team re same.	J.D.R.	690.00	3.50	\$2,415.00
10/3/2022	Review & summarized VA Class Action complaint.	T.E.E.	400.00	.70	\$280.00
10/3/2022	Reviewed opinions by USDC Judges Krause, Restrepo, and Smith.	T.E.E.	400.00	1.30	\$520.00

10/3/2022	Research "pipeline" retroactivity cases.	T.E.E.	400.00	.70	\$280.00
10/3/2022	Call with Mr. Thurston re interplay with JA. Preparation for and follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
10/3/2022	Attention to updates on Dwyer, Little, and Wasserman pro formas, e-mails re same, convert class action PP slide info into editable Word dates and data for trial prep, update e-mails to JR re pro formas	M.A.	82.50	2.00	\$165.00
10/3/2022	Attention to issues relating to pro formas	K.H.R.	550.00	2.00	\$1,100.00
10/4/2022	Reviewed/researched Krause, Restrepo and Smith opinions for IDEA & CA issues.	T.E.E.	400.00	1.40	\$560.00
10/4/2022	Research NJ on "pipeline retroactivity"	T.E.E.	400.00	.80	\$320.00
10/4/2022	Careful attention to settlement strategy; drafting materials for internal consideration re variables. Discussion with co-counsel re same.	J.D.R.	690.00	2.50	\$1,725.00
10/5/2022	Research Krause opinions re "class certification"	T.E.E.	400.00	1.20	\$480.00
10/5/2022	Further attention to settlement strategy; extended call with trial counsel re same.	J.D.R.	690.00	2.50	\$1,725.00
10/5/2022	Communications with potential co-counsel for B3 class.	J.D.R.	690.00	.80	\$552.00
10/5/2022	Drafting letter to amici re status and developments; correspondence with amici counsel re same.	J.D.R.	690.00	1.20	\$828.00

10/5/2022	Careful attention to settlement strategy. Discussion with trial counsel re same.	J.D.R.	690.00	1.00	\$690.00
10/5/2022	Trial prep with SBC, including preparation for and follow up to same; email correspondence re trial issues	K.H.R.	550.00	2.70	\$1,485.00
10/5/2022	Research Krause opinions "FAPE" & "IDEA"	T.E.E.	400.00	2.20	\$880.00
10/5/2022	Witness prep SBC, preparation for and follow up to same	K.H.R.	550.00	3.00	\$1,650.00
10/6/2022	Researched Smith opinions for "FAPE" & "IDEA"	T.E.E.	400.00	1.80	\$720.00
10/6/2022	Search of Smith opinions for "class certification"	T.E.E.	400.00	1.40	\$560.00
10/6/2022	Trail prep- Prepare hard copies of Trial Exhibits (Brown)	T.M.N.	150.00	1.00	\$150.00
10/6/2022	Assist Tara re SBC exhibit binder	M.A.	82.50	.50	\$41.25
10/6/2022	Attention to class action pro formas	M.A.	82.50	1.00	\$82.50
10/7/2022	Attention to communications with mediator re notice	J.D.R.	690.00	.80	\$552.00
10/7/2022	Attention to consultation with counsel for amici; preparation for and follow-up to same.	J.D.R.	690.00	1.80	\$1,242.00
10/7/2022	Attention to table of contents for SBC exhibit binder, printing, compiling, and organizing SBC exhibit docs, travel to and from Office Max for supplies for binders	M.A.	82.50	2.50	\$206.25

10/9/2022	Preparation for SBC pre-trial prep	K.H.R.	550.00	2.00	\$1,100.00
10/10/2022	Attention to settlement strategy; research re special master.	J.D.R.	690.00	3.30	\$2,277.00
10/10/2022	Call with A.S.; preparation for and followup to same.	J.D.R.	690.00	1.60	\$1,104.00
10/10/2022	T/C with SBC re trial prep and case issues; preparation for and follow up to same	K.H.R.	550.00	1.00	\$550.00
10/11/2022	Cont research of Smith opinions re "class certification"	T.E.E.	400.00	1.80	\$720.00
10/11/2022	Research Restrepo opinions for "FAPE" and "IDEA"	T.E.E.	400.00	1.80	\$720.00
10/11/2022	Mediation session; preparation for and follow-up to same; drafting communication to mediator.	J.D.R.	690.00	4.20	\$2,898.00
10/11/2022	E-filing	T.M.N.	150.00	.60	\$90.00
10/12/2022	Research Restrepo opinions for "class certification"	T.E.E.	400.00	1.50	\$600.00
10/12/2022	Pull all opinions on related class action dockets	T.M.N.	150.00	1.00	\$150.00
10/12/2022	Attention to settlement communications with adversary; settlement strategy	J.D.R.	690.00	3.30	\$2,277.00
10/12/2022	Trial team meeting re opening statement and technology issues	K.H.R.	550.00	2.00	\$1,100.00

10/13/2022	Zoom Conf Call re current status of case update.	T.E.E.	400.00	1.00	\$400.00
10/13/2022	Research Restrepo opinions for "Motion to Certify Class"	T.E.E.	400.00	1.30	\$520.00
10/13/2022	Amicus update meeting; preparation for and follow-up to same.	J.D.R.	690.00	2.50	\$1,725.00
10/13/2022	Attention to drafting letter to NJDOE re continuing obligation in discovery.	J.D.R.	690.00	1.20	\$828.00
10/13/2022	Communications with trial counsel re trial prep and related issues.	J.D.R.	690.00	1.50	\$1,035.00
10/14/2022	Attention to drafting communication to mediator; consultations with co-counsel re same.	J.D.R.	690.00	1.60	\$1,104.00
10/14/2022	Communications with mediator; communications with AMICUS SPAN re B3 class	J.D.R.	690.00	1.50	\$1,035.00
10/14/2022	Close attention to draft consent order, drafting case status report for AMICI	J.D.R.	690.00	3.20	\$2,208.00
10/14/2022	Legal research re American Pipe and China Agratech etc. communication with co-counsel re same	J.D.R.	690.00	3.50	\$2,415.00
10/14/2022	Attention to updated pro formas and analysis of same	K.H.R.	550.00	2.00	\$1,100.00
10/15/2022	Further attention to legal research re class action tolling	J.D.R.	690.00	2.50	\$1,725.00
10/16/2022	Further attention to revised draft consent order	J.D.R.	690.00	3.10	\$2,139.00



10/17/2022	Preparation for mediation.	J.D.R.	690.00	3.30	\$2,277.00
10/17/2022	Further attention to draft consent order	J.D.R.	690.00	1.50	\$1,035.00
10/17/2022	Attention to letter to Dan Dryzga	J.D.R.	690.00	1.50	\$1,035.00
10/17/2022	Communication with mediator	J.D.R.	690.00	.70	\$483.00
10/17/2022	Attention to settlement and mediation strategy	K.H.R.	550.00	1.50	\$825.00
10/18/2022	Research and reviewed Restrepo background and opinions for Memo	T.E.E.	400.00	2.50	\$1,000.00
10/18/2022	Travel for mediation.	J.D.R.	690.00	4.50	\$3,105.00
10/18/2022	Meeting with NJDOE counsel; preparation for and follow-up to same.	J.D.R.	690.00	5.20	\$3,588.00
10/19/2022	Research Restrepo for Opinion Memo	T.E.E.	400.00	1.20	\$480.00
10/19/2022	Attention to Reisman pro forma	M.A.	82.50	2.00	\$165.00
10/19/2022	Mediation prep.	J.D.R.	690.00	3.60	\$2,484.00
10/20/2022	Attention to finishing Reisman, Gran, O'Leary, and Thurston pro formas, call and e-mail to KR re same	M.A.	82.50	4.00	\$330.00

10/21/2022	Pre-trial prep; attention to pro formas and settlement strategy re same	K.H.R.	550.00	2.30	\$1,265.00
10/22/2022	Attention to legal research re stay request; attention to legal research re class definition revision; drafting letter to Court re same.	J.D.R.	690.00	3.60	\$2,484.00
10/23/2022	Drafting and revising letter to Judge Hillman	J.D.R.	690.00	2.50	\$1,725.00
10/24/2022	Research Smith opinions re "motion to continue trial pending class certification"	T.E.E.	400.00	1.30	\$520.00
10/24/2022	Attention to legal research re stay request; attention to legal research re class definition revision; drafting letter to Court re same.	J.D.R.	690.00	4.10	\$2,829.00
10/24/2022	Zoom meeting to discuss updates in CA case.	T.E.E.	400.00	1.20	\$480.00
10/24/2022	Attention to updated pro formas, send same to KR	M.A.	82.50	3.00	\$247.50
10/24/2022	E-filing	T.M.N.	150.00	.20	\$30.00
10/24/2022	Trial Prep-Prepare Sweeten trial exhibits (print, prepare table of contents, and bind)	T.M.N.	150.00	1.00	\$150.00
10/24/2022	Full team meeting; preparation for and follow up to same	J.D.R.	690.00	2.50	\$1,725.00
10/24/2022	Communication with third party witnesses in advance of trial	J.D.R.	690.00	1.50	\$1,035.00
10/24/2022	Internal meetings and follow-up to settlement negotiations, case status issues	K.H.R.	550.00	1.50	\$825.00

10/25/2022	Attention to organizing and formatting pro formas. Zoom meeting with KR and GL re same	M.A.	82.50	3.50	\$288.75
10/25/2022	Contact OAL witnesses to set phone conference per John's requests	T.M.N.	150.00	.50	\$75.00
10/25/2022	Discussion re trial expenses with trial counsel.	J.D.R.	690.00	.80	\$552.00
10/25/2022	Meeting with potential co-counsel; preparation for and follow-up to same.	J.D.R.	690.00	1.00	\$690.00
10/25/2022	Communication with R. Spar re class definition	J.D.R.	690.00	.70	\$483.00
10/25/2022	Communication with Peg Kinsell re legislative attention to 45 day rule violations	J.D.R.	690.00	.80	\$552.00
10/25/2022	Attention to fee decisions by Judge Hillman	J.D.R.	690.00	1.50	\$1,035.00
10/25/2022	Attention to trial related expenses	K.H.R.	550.00	1.50	\$825.00
10/26/2022	Attention to TOL pro forma	M.A.	82.50	1.50	\$123.75
10/26/2022	E-filing	T.M.N.	150.00	.20	\$30.00
10/26/2022	Close analysis of fee opinion from Adam X and supporting certifications	J.D.R.	690.00	3.20	\$2,208.00
10/27/2022	Research for Opinion Memo re Smith background.	T.E.E.	400.00	1.40	\$560.00

10/27/2022	Extended planning session with trial counsel.	J.D.R.	690.00	2.20	\$1,518.00
10/27/2022	Legal research re class preemption.	J.D.R.	690.00	2.50	\$1,725.00
10/27/2022	E-filing	T.M.N.	150.00	.10	\$15.00
10/27/2022	Meeting with Mr. Thurston re various issues surrounding settlement. Preparation for and follow-up to same.	J.D.R.	690.00	2.20	\$1,518.00
10/30/2022	Attention to strategy re mediation and anticipated DOE settlement proposal	K.H.R.	550.00	2.00	\$1,100.00
10/31/2022	Attention to drafting letter to Judge Hillman re class definition.	J.D.R.	690.00	1.80	\$1,242.00
10/31/2022	Meeting with co-counsel re settlement strategy; preparation for and follow up to same	J.D.R.	690.00	1.50	\$1,035.00
10/31/2022	Legal research re fees negotiations	J.D.R.	690.00	3.30	\$2,277.00
10/31/2022	Preliminary attention to NJDOE proposal	J.D.R.	690.00	1.50	\$1,035.00
10/31/2022	Communication with mediator	J.D.R.	690.00	.70	\$483.00
10/31/2022	Trial prep and attention to unified pro forma	K.H.R.	550.00	3.70	\$2,035.00
11/1/2022	Travel related to mediation	J.D.R.	690.00	6.00	\$4,140.00

11/1/2022	Attention to comments from amici re procedural guidelines	J.D.R.	690.00	2.50	\$1,725.00
11/1/2022	Legal research re presumption of reliance in common law fraud	J.D.R.	690.00	1.50	\$1,035.00
11/1/2022	Attention to NJDOE letter to Judge Hillman	J.D.R.	690.00	.80	\$552.00
11/1/2022	Assist in preparation for appearance before J. Hillman and discussion of strategies re various potential outcomes from that hearing	K.H.R.	550.00	2.00	\$1,100.00
11/2/2022	Preparation for mediation	J.D.R.	690.00	5.50	\$3,795.00
11/2/2022	Appearance before Judge Hillman; preparation for and follow up to same	J.D.R.	690.00	6.20	\$4,278.00
11/2/2022	Internal meeting re follow-up to court appearance and prep for mediation	K.H.R.	550.00	1.50	\$825.00
11/3/2022	E-filing	T.M.N.	150.00	.20	\$30.00
11/3/2022	Travel related to mediation	J.D.R.	690.00	6.00	\$4,140.00
11/3/2022	Attendance at mediation, preparation for and follow up to same	J.D.R.	690.00	8.50	\$5,865.00
11/3/2022	Attention to unified pro forma	K.H.R.	550.00	1.70	\$935.00
11/4/2022	E-filing	T.M.N.	150.00	.10	\$15.00

11/4/2022	Further attention to settlement proposal	J.D.R.	690.00	2.70	\$1,863.00
11/4/2022	Attention to pro formas	J.D.R.	690.00	.50	\$345.00
11/4/2022	Close analysis of fee decisions by Judges Hillman and Schneider	J.D.R.	690.00	2.80	\$1,932.00
11/4/2022	Attention to drafting cover letter to AG	J.D.R.	690.00	1.80	\$1,242.00
11/5/2022	Further attention to drafting letter to AG's office	J.D.R.	690.00	1.30	\$897.00
11/7/2022	Meeting with co-counsel to discuss fee negotiation strategy, preparation for and follow up to same	J.D.R.	690.00	.80	\$552.00
11/7/2022	Further attention to letter to AG re settlement	J.D.R.	690.00	1.50	\$1,035.00
11/7/2022	Attention to negotiation strategies re attorneys fees	K.H.R.	550.00	2.00	\$1,100.00
11/8/2022	Further attention to consent order	J.D.R.	690.00	3.90	\$2,691.00
11/8/2022	Attention to billing records	J.D.R.	690.00	1.50	\$1,035.00
11/8/2022	Attention to settlement and fees issues	K.H.R.	550.00	1.50	\$825.00
11/9/2022	Attention to class action pro formas and updating master fee list	M.A.	82.50	4.00	\$330.00

11/9/2022	Meeting with co-counsel re fee negotiation strategy, preparation for and follow up to same	J.D.R.	690.00	1.50	\$1,035.00
11/9/2022	Finalizing comments on DOE draft proposal, communications with adversary	J.D.R.	690.00	2.50	\$1,725.00
11/9/2022	OTSC	J.D.R.	690.00	1.20	\$828.00
11/11/2022	Attention to letter to collaborating firms re settlement strat	J.D.R.	690.00	2.20	\$1,518.00
11/11/2022	Communications with adversary	J.D.R.	690.00	.40	\$276.00
11/11/2022	Attendance at meeting with potential partner firm, preparation for and follow up to same	J.D.R.	690.00	2.50	\$1,725.00
11/14/2022	Attendance at SPAN event to update on case, preparation for and follow up to same	J.D.R.	690.00	2.50	\$1,725.00
11/14/2022	Further attention to letter to team re fee negotiation	J.D.R.	690.00	1.60	\$1,104.00
11/14/2022	Attention to CP pro formas, formatting and organizing master list of fees	M.A.	82.50	5.00	\$412.50
11/14/2022	Attention to CP pro formas	K.H.R.	550.00	1.00	\$550.00
11/14/2022	Attention to drafting Powerpoint slides for presentation of case to parent-side organizations.	S.Q.E.	500.00	.60	\$300.00
11/15/2022	Attention to communications from amici re FAQ, further attention to drafting same	J.D.R.	690.00	3.50	\$2,415.00

11/15/2022	Further attention to communications to team re fee negotiations	J.D.R.	690.00	1.80	\$1,242.00
11/15/2022	Meeting with potential partner firm, preparation for and follow up to same	J.D.R.	690.00	2.50	\$1,725.00
11/15/2022	Legal research re post judgement jurisdiction	J.D.R.	690.00	2.50	\$1,725.00
11/15/2022	Attention to transcribing Little entries into master fee sheet for settlement negotiations, attention to formatting same, continued aggregation and formatting of firm pro formas	M.A.	82.50	4.00	\$330.00
11/15/2022	Further attention to CP pro formas transcriptions, questions, and issues	K.H.R.	550.00	1.00	\$550.00
11/16/2022	Attendance at SPAN event to update on case, preparation for and follow up to same	J.D.R.	690.00	1.20	\$828.00
11/16/2022	Settlement call with AG's office; preparation for and follow-up to same.	J.D.R.	690.00	4.50	\$3,105.00
11/16/2022	Attention to pro formas and fees issues	K.H.R.	550.00	2.00	\$1,100.00
11/16/2022	Attention to planning for dealing with inquiries after notice goes out to B3 class.	J.D.R.	690.00	2.30	\$1,587.00
11/17/2022	Attention to preparing fee demand.	J.D.R.	690.00	1.50	\$1,035.00
11/17/2022	Further attention to revising settlement proposal; attention to drafting proposed adjournment request; attention to drafting template for monitor's report.	J.D.R.	690.00	2.50	\$1,725.00
11/17/2022	Attention to pro formas, Zoom meeting with KR re pro forma fees master list questions and formatting, continue organizing and formatting all firm time entries, finish transcribing Little	M.A.	82.50	4.00	\$330.00



time entries and send same to GL for review

11/17/2022	Zoom meeting w/ Megan re CP pro forma questions	K.H.R.	550.00	.75	\$412.50
11/18/2022	Continued attention to CP pro formas including follow up with all firms for most recent time entries	M.A.	82.50	3.00	\$247.50
11/18/2022	Attention to CP pro formas/answering questions re updating the master fee workbook	K.H.R.	550.00	.50	\$275.00
11/18/2022	Attention to strategy and planning for fee demand; close attention to billing records; team meeting re same; preparation for and follow-up to meeting.	J.D.R.	690.00	3.50	\$2,415.00
11/18/2022	Mediation prep	J.D.R.	690.00	4.50	\$3,105.00
11/18/2022	consultation with attorney for absent class member.	J.D.R.	690.00	.70	\$483.00
11/18/2022	Communications with named plaintiffs re status and developments.	J.D.R.	690.00	1.20	\$828.00
11/20/2022	Mediation prep	J.D.R.	690.00	3.60	\$2,484.00
11/21/2022	Further attention to CP pro formas	M.A.	82.50	2.25	\$185.63
11/21/2022	Mediation; preparation for and follow-up to same.	J.D.R.	690.00	8.50	\$5,865.00
11/21/2022	Travel related to mediation (tiem adjusted to reflect travel from Princeton office)	J.D.R.	690.00	2.00	\$1,380.00

11/22/2022	Further attention to CP pro formas, including revising and editing GL's pro forma pre GL additions and corrections	M.A.	82.50	4.00	\$330.00
11/22/2022	Attention to settlement issues; detailed discussions with team re same.	J.D.R.	690.00	3.50	\$2,415.00
11/22/2022	meeting with co-counsel re terms of agreement on case.	J.D.R.	690.00	.70	\$483.00
11/23/2022	Further attention to CP pro formas, including adding JW's pro forma and formatting same, as well as Coyle, JRA, part of RGCZ, and RT's pro formas	M.A.	82.50	5.00	\$412.50
11/23/2022	Attn to NJDOE response to settlement draft; meetings with team re same	J.D.R.	690.00	3.80	\$2,622.00
11/24/2022	Further attention to settlement draft; close attention to creating detailed redline in response	J.D.R.	690.00	2.80	\$1,932.00
11/25/2022	Meeting with co-counsel re settlement proposal; further attention to drafting response.	J.D.R.	690.00	2.50	\$1,725.00
11/25/2022	Further attention to revisions of settlement draft; meetings with co-counsel re same.	J.D.R.	690.00	2.70	\$1,863.00
11/26/2022	Further attention to revisions of the settlement draft.	J.D.R.	690.00	2.70	\$1,863.00
11/27/2022	Team meeting re settlement; preparation for and follow-up to same.	J.D.R.	690.00	2.90	\$2,001.00
11/28/2022	Case related finance management	M.A.	82.50	2.00	\$165.00
11/28/2022	Case related finance management	K.H.R.	550.00	2.00	\$1,100.00

11/28/2022	Meeting to discuss rates in context of fee demand; preparation for and follow-up to same.	J.D.R.	690.00	.80	\$552.00
11/28/2022	Further attention to settlement strategy and planning; several meetings and calls with co-counsel re same.	J.D.R.	690.00	3.70	\$2,553.00
11/29/2022	Continued attention to CP pro formas	M.A.	82.50	2.25	\$185.63
11/29/2022	Settlement strategy; meetings and discussions re same.	J.D.R.	690.00	2.50	\$1,725.00
11/29/2022	Call with named plaintiff re status and developments; preparation for and follow-up to same.	J.D.R.	690.00	1.90	\$1,311.00
11/29/2022	Team meeting re status and developments; preparation for and follow-up to same.	J.D.R.	690.00	1.20	\$828.00
11/30/2022	Create CP timeline spreadsheet and key	T.M.N.	150.00	1.50	\$225.00
11/30/2022	Attention to pro formas w/ DS, updating, formatting, and tracking revisions, e-mails w/ TOL and KR re revisions to Walsh pro forma	M.A.	82.50	5.00	\$412.50
11/30/2022	Further attention to billing records and fee demand; meeting with team re creation of timeline; preparation for and follow-up to same.	J.D.R.	690.00	3.30	\$2,277.00
11/30/2022	Further attention to legal authority relevant to fee demand/application; review of past decisions by Judge Hillman.	J.D.R.	690.00	4.50	\$3,105.00
11/30/2022	Team meeting re JA matter.	J.D.R.	690.00	1.50	\$1,035.00
12/1/2022	Prep Timeline	T.E.E.	400.00	1.20	No Charge

12/1/2022	Continued attention to CP pro formas, updating and formatting same	M.A.	82.50	4.00	\$330.00
12/1/2022	Communications and discussions with co-counsel re status and develments.	J.D.R.	690.00	1.10	\$759.00
12/1/2022	Further attention to materials for fee demand.	J.D.R.	690.00	1.80	\$1,242.00
12/2/2022	Further attention to CP pro formas, updating master fee workbook and reformatting updated pro formas	M.A.	82.50	2.25	\$185.63
12/2/2022	Further attention to fee demand; close review of records.	J.D.R.	690.00	2.20	\$1,518.00
12/2/2022	Further attention to settlement strategy and planning.	J.D.R.	690.00	2.90	\$2,001.00
12/3/2022	Attention to recent statutory authority re qualifications of ALJs for sped hearings	J.D.R.	690.00	1.50	\$1,035.00
12/5/2022	Draft email to Plaintiffs re status of case and negotiations	K.H.R.	550.00	.50	\$275.00
12/5/2022	Attention to aggregate pro forma issues	K.H.R.	550.00	1.30	\$715.00
12/5/2022	Attention to updating and formatting the master fee workbook, call w/ DS re updates to master workbook and formatting issues, e-mails w/ CP firms re revisions and updating the master workbook	M.A.	82.50	4.50	\$371.25
12/5/2022	Meeting with counsel for amici re settlement; preparation for and follow-up to same.	J.D.R.	690.00	3.20	\$2,208.00

12/5/2022	Further attention to settlement strategy; discussions with co-counsel re same.	J.D.R.	690.00	1.80	\$1,242.00
12/5/2022	Extensive discussions among team about billing documentation and completeness of billing records; meetings re same, with preparation for and follow-up to same.	J.D.R.	690.00	4.70	\$3,243.00
12/5/2022	Attention to drafting letter to court re status of negotiations re class notice.	J.D.R.	690.00	1.50	\$1,035.00
12/6/2022	Continued attention to updating and formatting the CP pro formas, e-mails w/ DS and JR re master fee workbook	M.A.	82.50	6.00	\$495.00
12/6/2022	Further attention to settlement draft; finalizing redline for NJDOE to consider; cover letter.	J.D.R.	690.00	3.80	\$2,622.00
12/6/2022	Communication with counsel for amici re settlement issues; preparation for and follow-up to same.	J.D.R.	690.00	1.20	\$828.00
12/7/2022	Communications with named plaintiffs re trial prep.	J.D.R.	690.00	.80	\$552.00
12/7/2022	Further attention to motion to approve notice.	J.D.R.	690.00	1.30	\$897.00
12/7/2022	Call with Mr. Soutar re class notice.	J.D.R.	690.00	.10	\$69.00
12/8/2022	Communications with CP clients re availability and scheduling update calls with JR	M.A.	82.50	.75	\$61.88
12/8/2022	Attention to updating and formatting CP Pro formas	M.A.	82.50	2.50	\$206.25
12/8/2022	Attention to NJDOE settlement response; discussions re same with co-counsel.	J.D.R.	690.00	1.20	\$828.00

12/8/2022	Strategy, planning and research re motion for notice approval.	J.D.R.	690.00	2.50	\$1,725.00
12/8/2022	Calls (2) with Mr. Giles for update and discussion of merits.	J.D.R.	690.00	.50	\$345.00
12/8/2022	Calls (3) with Mr. Soutar re class notice and settlement status.	J.D.R.	690.00	.30	\$207.00
12/8/2022	Call with Mr. Little re trial planning and settlement status.	J.D.R.	690.00	.40	\$276.00
12/9/2022	Attention to finalizing motion to approve class notice, ancillary docs/correspondence re. same	S.Q.E.	500.00	2.90	\$1,450.00
12/9/2022	Attention to finalizing motion to approve class notice, ancillary docs/correspondence re. same/attention to filing same	S.Q.E.	500.00	.30	\$150.00
12/9/2022	Finish CP pro forma formatting, e-mail DS re updating JRA worksheet, begin updating JRA's worksheet to reflect entries up to 12/9	M.A.	82.50	2.00	\$165.00
12/9/2022	Final review of motion to approve notice to class.	J.D.R.	795.00	1.50	\$1,192.50
12/9/2022	Calls (3) with Mr. Soutar re notice and settlement status.	J.D.R.	690.00	.30	\$207.00
12/12/2022	Attention to updating entries of JRA worksheet to 12/9	M.A.	82.50	2.25	\$185.63
12/12/2022	Calls (3) with Mr. Soutar re notice and settlement status.	J.D.R.	690.00	1.40	\$966.00
12/12/2022	Calls (4) with Ms. Reisman re notice and settlement status.	J.D.R.	690.00	.60	\$414.00

12/12/2022	Call with Mr. Little re trial planning and settlement status	J.D.R.	690.00	.30	\$207.00
12/13/2022	Calls (6) with SED re case mgmt.	J.D.R.	690.00	1.30	\$897.00
12/14/2022	E-filing	T.M.N.	150.00	.70	\$105.00
12/14/2022	Attention to correcting entry date, communications w/ DS re pro forma changes made	M.A.	82.50	.75	\$61.88
12/15/2022	Calls (3) with Mr. Wasserman re settlement status and fee application.	J.D.R.	690.00	.60	\$414.00
12/15/2022	Call with Ms. Reisman and Mr. Little re settlement status. Follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
12/15/2022	Continued attention to reformatting CP pro formas, additions to workbook, and updating pro formas	M.A.	82.50	2.00	\$165.00
12/15/2022	Call with CR.	J.D.R.	690.00	.90	\$621.00
12/16/2022	Calls with Ms. Reisman re settlement status.	J.D.R.	690.00	.80	\$552.00
12/16/2022	Call with Ms. Valverde re settlement issues.	J.D.R.	690.00	.60	\$414.00
12/16/2022	Call with Mr. Little and Ms. Reisman re settlement issues; follow-up to same.	J.D.R.	690.00	1.50	\$1,035.00
12/16/2022	Close attention to draft JA settlement agreement.	J.D.R.	690.00	1.50	\$1,035.00

12/17/2022	Call with Mr. Little re settlement issues; follow-up to same.	J.D.R.	690.00	1.20	\$828.00
12/17/2022	Call with Mr. Giles re settlement issues; follow-up to same.	J.D.R.	690.00	.60	\$414.00
12/17/2022	Call with Mr. Soutar re settlement issues; follow-up to same.	J.D.R.	690.00	.80	\$552.00
12/17/2022	Call with Ms. Dwyer re settlement issues; follow-up to same.	J.D.R.	690.00	1.10	\$759.00
12/18/2022	Call with Mr. Little re settlement issues; follow-up to same.	J.D.R.	690.00	.50	\$345.00
12/18/2022	Attention to file of YHS administrative procedure, in preparation for trial.	J.D.R.	690.00	2.10	\$1,449.00
12/19/2022	Call with Ms. Reisman re settlement; follow-up to same.	J.D.R.	690.00	1.20	\$828.00
12/19/2022	Call with Ms. Valverde re settlement issues.	J.D.R.	690.00	.50	\$345.00
12/19/2022	Call with Mr. Soutar re settlement issues and fee demand; follow-up to same.	J.D.R.	690.00	.50	\$345.00
12/19/2022	Call with Ms. Reisman re settlement issues; follow-up to same.	J.D.R.	690.00	.20	\$138.00
12/19/2022	Call w/ DS re pro forma changes/updates, attention to updating and reformatting Dwyer CP pro formas, e-mail Don that same is complete	M.A.	82.50	3.00	\$247.50
12/20/2022	E-filing	T.M.N.	150.00	.40	\$60.00



12/20/2022	Mediation; preparation for and follow-up to same.	J.D.R.	690.00	3.50	\$2,415.00
12/20/2022	Attention to trial demonstratives.	J.D.R.	690.00	2.20	\$1,518.00
12/20/2022	Attention to draft to DOE re settlement and communication with co-counsel re same	J.D.R.	690.00	2.60	\$1,794.00
12/21/2022	Call with CR Calls (2) w/ GL Call w/DS Call w/JW	J.D.R.	690.00	.80	\$552.00
12/21/2022	Further Attention to Redline settlement agreement and communication with co-counsel re same	J.D.R.	690.00	3.50	\$2,415.00
12/21/2022	Communication to named Plaintiff's re status developments	J.D.R.	690.00	3.50	\$2,415.00
12/22/2022	E-filing	T.M.N.	150.00	.40	\$60.00
12/22/2022	Call w/ GL Call w/CR Calls (2) w/JW Call w/DS Call w/DD	J.D.R.	690.00	1.30	\$897.00
12/22/2022	Attention to letter to DOE re concessions and appeal; communication with Team re same; follow-up call with AJ's office	J.D.R.	690.00	4.20	\$2,898.00
12/22/2022	Further attention to Redline agreement	J.D.R.	690.00	2.50	\$1,725.00
12/23/2022	Call w/SED re case mgmt	J.D.R.	690.00	.50	\$345.00

12/23/2022	Further attention to concession and appeal re consent order; discussion with Team re same	J.D.R.	690.00	2.50	\$1,725.00
12/23/2022	Further attention to settlement negotiations, revisions to settlement draft	J.D.R.	690.00	2.80	\$1,932.00
12/24/2022	Calls (3) w/GL Call w/CR	J.D.R.	690.00	1.40	\$966.00
12/25/2022	Call w/JW	J.D.R.	690.00	.20	\$138.00
12/25/2022	Attention to opposition to Motion to Stay; legal research re same; communication with Team re same	J.D.R.	690.00	3.30	\$2,277.00
12/26/2022	Calls (11) w/GL Calls (2) w/JW Calls (2) w/DS	J.D.R.	690.00	2.70	\$1,863.00
12/26/2022	Further communication with Team re opposition to Motion to Stay	J.D.R.	690.00	1.10	\$759.00
12/26/2022	Communication with opposing council re adjournment request	J.D.R.	690.00	1.20	\$828.00
12/27/2022	E-filing	T.M.N.	150.00	.10	\$15.00
12/27/2022	Calls (8) w/GL Calls (3) w/CR Calls (2) w/TOL Call w/SED re case mgmt	J.D.R.	690.00	3.10	\$2,139.00
12/27/2022	Calls (3) w/DS Review communication from counsel for JA	J.D.R.	690.00	1.50	\$1,035.00

12/27/2022	Communication with counsel re AMICI	J.D.R.	690.00	.40	\$276.00
12/27/2022	Further attention to settlement issues	J.D.R.	690.00	1.20	\$828.00
12/27/2022	Drafting Consent Order to mute 3rd circuit appeal	J.D.R.	690.00	2.30	\$1,587.00
12/27/2022	Drafting joint letter to Judge Hillman re Consent Order; communication with opposing counsel re same	J.D.R.	690.00	2.50	\$1,725.00
12/28/2022	Call w/GL Call w/JV	J.D.R.	690.00	1.20	\$828.00
12/28/2022	Communication with mediator; strategy and planning	J.D.R.	690.00	1.50	\$1,035.00
12/28/2022	Communication with Team re fee demand	J.D.R.	690.00	2.20	\$1,518.00
12/28/2022	E-filing	T.M.N.	150.00	.30	\$45.00
12/29/2022	Call w/GL	J.D.R.	690.00	.20	\$138.00
12/30/2022	Call w/GL	J.D.R.	690.00	.20	\$138.00
12/30/2022	Review communication with co-counsel	J.D.R.	690.00	1.20	\$828.00
12/31/2022	Calls (5) w/DS	J.D.R.	690.00	.50	\$345.00

1/1/2023	Call w/DS	J.D.R.	690.00	.60	\$414.00
1/2/2023	Meeting with DS re fee demand; follow-up to same	J.D.R.	690.00	3.80	\$2,622.00
1/2/2023	Call with DS Call with DG	J.D.R.	690.00	2.40	\$1,656.00
1/3/2023	Call w/JW Call w/DD Call w/GL Call w/DS Call w/JW	J.D.R.	690.00	.30	\$207.00
1/3/2023	Attention to settlement strategy; fee demand; legal research re same.	J.D.R.	690.00	4.20	\$2,898.00
1/3/2023	E-filing	T.M.N.	150.00	.10	\$15.00
1/4/2023	Attention to legal research and analysis of controlling authority re attorneys' fees.	J.D.R.	690.00	2.50	\$1,725.00
1/4/2023	Add experience per Krista's request	T.M.N.	150.00	.20	\$30.00
1/4/2023	Expense project	T.M.N.	150.00	2.00	\$300.00
1/5/2023	Attention to fee demand; legal research re same.	J.D.R.	690.00	2.80	\$1,932.00
1/6/2023	Attention to NJDOE's redline on settlement proposal; consultation with team re same.	J.D.R.	690.00	3.50	\$2,415.00
1/8/2023	Conference to discuss settlement draft and strategy	J.D.R.	690.00	1.50	\$1,035.00

1/9/2023	Further attention to settlement; attention to drafting cover letter for new redline to NJDOE; calls with co-counsel re same; email to NJDOE re same.	J.D.R.	690.00	4.50	\$3,105.00
1/9/2023	Attention to settlement strategy and discussion re response to DOE redline	K.H.R.	550.00	1.00	\$550.00
1/9/2023	E-mail w/ DS re pro forma updates, update and format Little and RCGZ pro formas, e-mail Little re same so he can review and send any additional entries	M.A.	82.50	2.50	\$206.25
1/10/2023	Trial prep: Attention to evidentiary issues.	J.D.R.	690.00	1.50	\$1,035.00
1/10/2023	Attention to legal issues surrounding remedy, jurisdiction, and immunity.	J.D.R.	690.00	3.50	\$2,415.00
1/10/2023	Legal research re applicability of AW v. Jersey City to actions for damages.	J.D.R.	690.00	2.30	\$1,587.00
1/10/2023	E-filing	T.M.N.	150.00	.10	\$15.00
1/11/2023	E-mail to DS re pro forma updates and workbook version updates	M.A.	82.50	.15	\$12.38
1/11/2023	Preparation for session with mediator	J.D.R.	690.00	2.20	\$1,518.00
1/11/2023	Call w/ Ms. Reisman	J.D.R.	690.00	.20	\$138.00
1/11/2023	Calls w/ Mr. Little (2)	J.D.R.	690.00	.30	\$207.00
1/11/2023	Calls w/ Mr. Soutar (4)	J.D.R.	690.00	.70	\$483.00

1/11/2023	Attention to recent authority from Judge Hillman, legal analysis of same	J.D.R.	690.00	.30	\$207.00
1/11/2023	Further attention to mediation preparation	J.D.R.	690.00	1.50	\$1,035.00
1/12/2023	Mediation session w/ Judge Schneider, preparation for and follow-up to same; follow up letter to Judge Schneider	J.D.R.	690.00	3.80	\$2,622.00
1/12/2023	Call w/ Diaz	J.D.R.	690.00	.20	\$138.00
1/12/2023	Call w/ CR	J.D.R.	690.00	.10	\$69.00
1/12/2023	Legal Research - Skahill Lodestar decisions	T.M.N.	150.00	1.00	\$150.00
1/12/2023	Communications w/ DS re pro forma workbook updates, update JRA and RCGZ pro formas	M.A.	82.50	2.00	\$165.00
1/13/2023	Attention to adding and updating RCGZ expenses in master fee workbook, e-mail DS re update on same	M.A.	82.50	1.00	\$82.50
1/16/2023	Update JRA pro forma to 1/12	M.A.	82.50	.20	\$16.50
1/16/2023	Call with Ms. Reisman re settlement; follow-up to same.	J.D.R.	690.00	.20	\$138.00
1/17/2023	Call with Catherine Reisman and Follow-up	T.M.N.	150.00	.50	\$75.00
1/17/2023	Review of summary of DoE proposal; Legal research re "manifest injustice" standard; Draft analysis re same	K.H.R.	550.00	1.20	\$660.00

1/17/2023	Call with Ms. Reisman re settlement; follow-up with team re same.	J.D.R.	690.00	1.50	\$1,035.00
1/17/2023	Legal research re negotiation issues.	J.D.R.	690.00	1.60	\$1,104.00
1/17/2023	Attention to trial issues re misrepresentation.	J.D.R.	690.00	1.30	\$897.00
1/17/2023	E-filing	T.M.N.	150.00	.30	\$45.00
1/18/2023	Settlement strategy and planning; call with team; follow-up to same.	J.D.R.	690.00	2.40	\$1,656.00
1/18/2023	Attention to settlement strat; follow up to CR call w/ Judge Schneider, conference call w/ team, follow up to same	J.D.R.	690.00	3.20	\$2,208.00
1/19/2023	E-filing	T.M.N.	150.00	.20	\$30.00
1/19/2023	Calls w/ DS (2); DG (2); JW	J.D.R.	690.00	.90	\$621.00
1/19/2023	Attention to NJDOE redline; attention to drafting responsive redline	J.D.R.	690.00	2.50	\$1,725.00
1/20/2023	Call w/ CR	J.D.R.	690.00	.20	\$138.00
1/20/2023	Attention to communications w/ mediator	J.D.R.	690.00	1.20	\$828.00
1/22/2023	Cal w/ GL; call w/ CR	J.D.R.	690.00	.80	\$552.00

1/22/2023	Communications w/ D. Drizga re settlement; follow up w/ team re same	J.D.R.	690.00	.70	\$483.00
1/23/2023	Meeting with D. Dryzga re settlement; calls with DS, CR, JW, KR, follow-up; legal research re fee shifting.	J.D.R.	690.00	4.20	\$2,898.00
1/23/2023	Call w/ GL; calls w/ CR (2); call w/ DS	J.D.R.	690.00	1.60	\$1,104.00
1/23/2023	Attention to preparation of summary of amici legal status for trial counsel	J.D.R.	690.00	.50	\$345.00
1/24/2023	two calls with D. Dryzga re settlement; calls with DS, CR, JW, KR, follow-up; further attention to legal research re fee shifting.	J.D.R.	690.00	4.10	\$2,829.00
1/25/2023	Legal research re class counsel authority in settlement; close factual analysis of related issues.	J.D.R.	690.00	4.80	\$3,312.00
1/26/2023	Attention to litigation finance disclosure rules	J.D.R.	690.00	1.20	\$828.00
1/26/2023	Call w/ CR	J.D.R.	690.00	.40	\$276.00
1/27/2023	Calls w/ GL (4)	J.D.R.	690.00	.60	\$414.00
1/28/2023	Calls w/ GL (2)	J.D.R.	690.00	.30	\$207.00
1/28/2023	Calls /w CR	J.D.R.	690.00	.30	\$207.00
1/29/2023	Calls w/ GL (1)	J.D.R.	690.00	.10	\$69.00



1/29/2023	Calls w/ CR (2)	J.D.R.	690.00	.20	\$138.00
1/29/2023	Calls w/ DS	J.D.R.	690.00	.30	\$207.00
1/29/2023	Calls w/ JW	J.D.R.	690.00	.10	\$69.00
1/30/2023	Attention to settlement, attention to new developments in OAL procedures	J.D.R.	690.00	3.50	\$2,415.00
1/30/2023	Calls w/ CR (6)	J.D.R.	690.00	.80	\$552.00
1/30/2023	Calls w/ JW (3)	J.D.R.	690.00	.30	\$207.00
1/30/2023	Call w/ DS	J.D.R.	690.00	.10	\$69.00
1/31/2023	Remote meeting w/ AG's office (2); follow up to same	J.D.R.	690.00	1.50	\$1,035.00
1/31/2023	Further attention to settlement, revising draft agreement; calls w/ AG's office	J.D.R.	690.00	4.50	\$3,105.00
1/31/2023	Calls w/ CR (2)	J.D.R.	690.00	.60	\$414.00
1/31/2023	Calls w/ GL	J.D.R.	690.00	.80	\$552.00
2/1/2023	Attention to finalizing settlement, communications w/ team, calls w/ AG's office	J.D.R.	690.00	3.70	\$2,553.00

2/1/2023	Calls /w GL (6)	J.D.R.	690.00	.90	\$621.00
2/1/2023	Calls w/ CR (9)	J.D.R.	690.00	1.70	\$1,173.00
2/1/2023	Calls w/ JW	J.D.R.	690.00	.10	\$69.00
2/1/2023	Calls w/ DS (3)	J.D.R.	690.00	.80	\$552.00
2/2/2023	Further attention to settlement, further attention to new mediation in OAL, communications w/ counsel for amici, preliminary attention to settlement approval process, e-mail communications w/ Judge Schneider, drafting a filing letter to Judge Hillman	J.D.R.	690.00	4.50	\$3,105.00
2/2/2023	Calls w/ CR (2)	J.D.R.	690.00	.20	\$138.00
2/2/2023	Calls w/ CR (6)	J.D.R.	690.00	.90	\$621.00
2/2/2023	Calls w/ DS (2)	J.D.R.	690.00	.70	\$483.00
2/2/2023	Call w/ GL	J.D.R.	690.00	.50	\$345.00
2/2/2023	Call w/ Carolyn Labin	J.D.R.	690.00	.20	\$138.00
2/2/2023	Call w/ DS re pro forma update planning, schedule next update call re same	M.A.	82.50	.50	\$41.25

2/2/2023	Review proposed settlement, team correspondence/discussion, follow-up question with JRA and Greg Little	L.Q.	500.00	.30	\$150.00
2/3/2023	Attention to drafting letter to amici proposing collaborative process for consideration of settlement. Correspondence with team re same.	J.D.R.	690.00	2.50	\$1,725.00
2/3/2023	Preliminary attention to overview of settlement for amici.	J.D.R.	690.00	2.60	\$1,794.00
2/3/2023	Call with mediator and adverse counsel; preparation for and follow-up to same.	J.D.R.	690.00	1.60	\$1,104.00
2/3/2023	Call Judge re status of adjournment request letter	T.M.N.	150.00	.50	\$75.00
2/4/2023	Call w/ DS; follow up to same	J.D.R.	690.00	.60	\$414.00
2/5/2023	Call w/ DS; follow up to same	J.D.R.	690.00	.20	\$138.00
2/5/2023	Calls w/ JW (2); follow up to same	J.D.R.	690.00	.80	\$552.00
2/6/2023	Attention to updating JRA's time entries to present; e-mails w/ DS about updating all firms in workbook; e-mails w/ DS re MC entry and correction of same	M.A.	82.50	1.75	\$144.38
2/6/2023	E-mail communications w/ co-counsel re amici	J.D.R.	690.00	.70	\$483.00
2/6/2023	E-mail communications w/ counsel for amici	J.D.R.	690.00	.40	\$276.00
2/6/2023	Drafting letter to counsel for amici	J.D.R.	690.00	1.70	\$1,173.00

2/6/2023	Calls w/ DS (2); follow up to same	J.D.R.	690.00	1.80	\$1,242.00
2/6/2023	Calls w/ CR (5); follow up to same	J.D.R.	690.00	1.20	\$828.00
2/6/2023	Call w/ JW; follow up to same	J.D.R.	690.00	.90	\$621.00
2/7/2023	E-mails w/ DS re Michelle Cummin entry	M.A.	82.50	.40	\$33.00
2/7/2023	E-mail communications w/ co-counsel re attorneys fees	J.D.R.	690.00	1.20	\$828.00
2/7/2023	Review correspondence from counsel for amici; follow up to same	J.D.R.	690.00	.80	\$552.00
2/7/2023	Calls w/ DS (4); follow up to same	J.D.R.	690.00	1.20	\$828.00
2/7/2023	Call w/ Scott Strunk; follow up to same	J.D.R.	690.00	.50	\$345.00
2/7/2023	Call w/ Diana Osborn; follow up to same	J.D.R.	690.00	.30	\$207.00
2/7/2023	Call w/ Shaye Brown-Crandol; follow up to same	J.D.R.	690.00	.50	\$345.00
2/7/2023	Call w/ Adele Sweeten; follow up to same	J.D.R.	690.00	.40	\$276.00
2/8/2023	Call w/ DS re pro forma updates	M.A.	82.50	.40	\$33.00

2/8/2023	Attention to written communication with counsel for amici	J.D.R.	690.00	.80	\$552.00
2/8/2023	Calls w/ CR (6); follow up to same	J.D.R.	690.00	1.30	\$897.00
2/8/2023	Call w/ WP, follow up to same	J.D.R.	690.00	.40	\$276.00
2/8/2023	Calls w/ GL(2), follow up to same	J.D.R.	690.00	1.70	\$1,173.00
2/8/2023	Call w/ Dan Drizga; follow up to same	J.D.R.	690.00	.50	\$345.00
2/8/2023	Call w/ counsel for amici; follow up to same	J.D.R.	690.00	.30	\$207.00
2/9/2023	E-mails w/ DS and TJO re time corrections; update master workbook and notes	M.A.	82.50	.50	\$41.25
2/9/2023	E-mail communications w/ co-counsel re fee negotiations	J.D.R.	690.00	.50	\$345.00
2/9/2023	Calls w/ DS (2); follow up to same	J.D.R.	690.00	2.20	\$1,518.00
2/10/2023	E-mails w/ team re fee negotiations	J.D.R.	690.00	1.50	\$1,035.00
2/11/2023	Call w/ DS & KR re fee negotiation; follow up to same	J.D.R.	690.00	2.30	\$1,587.00
2/11/2023	Strategy call with JDR & DS; preparation and follow up to same	K.H.R.	550.00	1.40	\$770.00

2/14/2023	Attention to drafting correspondence to co-counsel re fees	J.D.R.	690.00	2.60	\$1,794.00
2/14/2023	Preparation for meeting with amici; close attention to settlement agreement re same; drafting correspondence re same.	J.D.R.	690.00	3.50	\$2,415.00
2/14/2023	Attention to settlement issues and fee negotiation strategy	K.H.R.	550.00	2.70	\$1,485.00
2/15/2023	Close and extended attention to fee negotiation strategy.	J.D.R.	690.00	2.50	\$1,725.00
2/15/2023	Extended meeting with all amici re settlement terms; preparation for and follow-up to same.	J.D.R.	690.00	4.50	\$3,105.00
2/15/2023	Call with Dan Dryzga re status. Follow-up with team re same.	J.D.R.	690.00	.80	\$552.00
2/15/2023	Analysis of fee issues and coordination of documentation issues	K.H.R.	550.00	2.10	\$1,155.00
2/16/2023	Further follow-up on issues raised by amici.	J.D.R.	690.00	.70	\$483.00
2/16/2023	Calls w/ DS (2)	J.D.R.	690.00	.30	\$207.00
2/16/2023	Calls w/ CR (5)	J.D.R.	690.00	.70	\$483.00
2/16/2023	Call w/ GL	J.D.R.	690.00	.10	\$69.00
2/16/2023	Further attention to drafting settlement agreement.	J.D.R.	690.00	3.30	\$2,277.00

2/17/2023	Attention to updating master workbook for Giles and Dwyer; transcribing and updating Little entries, send same to GL for review	M.A.	82.50	3.50	\$288.75
2/17/2023	Attention to settlement issues and fee negotiation strategy	K.H.R.	550.00	2.70	\$1,485.00
2/17/2023	E-file letter per John's request	T.M.N.	150.00	.10	\$15.00
2/17/2023	Review of settlement and team correspondence/discussio	L.Q.	500.00	.20	\$100.00
2/17/2023	Calls w/ CR (8)	J.D.R.	690.00	1.00	\$690.00
2/17/2023	Calls w/ DS (3)	J.D.R.	690.00	.60	\$414.00
2/17/2023	Call w/ Carolyn Labin	J.D.R.	690.00	.10	\$69.00
2/17/2023	Attention to various aspects of finalizing settlement agreement and exhibits; attention to drafting and filing letter with Judge Hillman.	J.D.R.	690.00	5.50	\$3,795.00
2/18/2023	Calls w/ GL (2)	J.D.R.	690.00	.30	\$207.00
2/18/2023	Call w/ DS	J.D.R.	690.00	1.10	\$759.00
SUBTOTAL:				5388.35	\$2,777,567.54

**Costs/Expenses**

\$27,631.59

**TOTAL BILLING AND EXPENSES: \$2,805,199.13**



# **Exhibit B**

<b>Timekeeper Name</b>	<b>Admission Year</b>
Al Ford	law clerk
Anna Edwards	law clerk
Anne Roque	paralegal
Claire Walsh	paralegal
Clinton Glass	law clerk
Donald Soutar	1999
Dylan Fleming	2010
Eric Storjohann	2016
Frank Geier	2005
John Rue	2005
Kenneth Walk	2019
Krista H. Rue	2002
Latiah Griffin	2020
Lisa Quartarolo	1998
Matthew Crimmel	2017
Megan Atkinson	paralegal
Michelle Scanlon Cummins	2015
Sara Tarrabocchia	law clerk
Saran Edwards	2011
Saraya Sikora	paralegal
Sean Dalrymple	paralegal
Tara Nutter	paralegal
Travis Ellison	2005
Wayne Pollock	2009