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LAMBDA LEGAL DEFENSE AND EDUCATION FUND, INC.
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Attorneys for Plaintiff Jennifer Fletcher

UNITED STATES DISTRICT COURT
DISTRICT OF ALASKA

Jennifer Fletcher,

Plaintiff,

vs.

State of Alaska,

Defendant.

Case No. 1:18-cv-00007-HRH

**DECLARATION OF TARA L. BORELLI IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEY'S FEES AND EXPENSES**

Fletcher v. Alaska, No. 1:18-cv-00007-HRH

I, Tara L. Borelli, do hereby declare as follows:

1. I am more than eighteen (18) years of age, have personal knowledge of the facts set forth herein, and am otherwise competent to testify to the matters set forth herein.

2. I am Counsel with Lambda Legal Defense and Education Fund, Inc. (“Lambda Legal”), and counsel for Plaintiff Jennifer Fletcher in this litigation. I make this declaration in support of Plaintiff’s Motion for Attorney’s Fees and Expenses.

A. Lambda Legal

3. Lambda Legal is the oldest and largest legal organization committed to achieving full recognition of the civil rights of lesbian, gay, bisexual, and transgender (“LGBT”) people and everyone living with HIV through impact litigation, education, and public policy work. Lambda Legal has been party counsel in several leading Supreme Court cases impacting the rights of LGBT people. *See, e.g., Obergefell v. Hodges*, 576 U.S. 644 (2015); *Lawrence v. Texas*, 539 U.S. 558 (2003); *Romer v. Evans*, 517 U.S. 620 (1996). Lambda Legal is a 501(c)(3) non-profit legal organization that does not charge its clients for legal services, and did not charge Ms. Fletcher in this litigation, but instead relies in part upon fees awarded by the courts to sustain its operations.

4. Lambda Legal possesses deep expertise in the subject matter at issue in this case, which challenged Defendant State of Alaska’s exclusion of gender-confirming surgical care from coverage under the AlaskaCare Employee Health Plan as unlawful sex discrimination under Title VII of the Civil Rights Act of 1964. As explained below, Lambda Legal’s role in this litigation was essential to the success of the case given its

highly specialized expertise in advocacy on behalf of transgender people, and in particular, their health care needs.

5. Lambda Legal has significant litigation experience challenging discrimination against transgender people across a variety of contexts, with many of its cases establishing important precedent in the field. *See, e.g., Adams v. St. Johns Cnty. Sch. Dist., Fla.*, -- F.3d -- (11th Cir. 2020) (counsel for transgender boy seeking the right to use the boys' restroom at his high school); *Karnoski v. Trump*, 926 F.3d 1180 (9th Cir. 2019) (counsel in challenge to ban on open military service by transgender people; establishing precedent that discrimination against transgender people requires heightened scrutiny under equal protection); *Glenn v. Brumby*, 663 F.3d 1312 (11th Cir. 2011) (counsel for transgender employee; establishing precedent that discrimination against transgender people is sex discrimination). I have personally litigated several of these cases.

6. Lambda Legal has also litigated numerous cases regarding access to health care for LGBT people, including, in particular, gender-confirming care (also known as transition-related care). *See, e.g., Rosati v. Igbinoso*, 791 F.3d 1037, 1040 (9th Cir. 2015) (counsel on appeal for transgender prisoner denied access to gender-confirming surgical care); *Being v. Crum*, No. 3:19-cv-00060 (D. Alaska) (counsel in putative class action challenging exclusion of gender-confirming care in Alaska's Medicaid program); *Kadel v. Folwell*, No. 1:19-cv-00272 (M.D.N.C.) (counsel for North Carolina state employees and dependents denied access to gender-confirming health care under state employee insurance plan); *Conforti v. St. Joseph's Healthcare System*, No. 2:17-cv-00050 (D.N.J.)

(challenging hospital's refusal to allow surgeon to perform gender-confirming surgery); *Lawrence v. Rigas*, No. 510-2014-00396X (E.E.O.C.) (counsel for transgender retiree in federal sector EEO proceedings seeking non-discriminatory access to health insurance coverage under Title VII); *Esquivel v. State of Oregon*, No. 11C17487 (Or. Cir. Ct. 2011) (counsel in a first-of-its-kind lawsuit deploying state anti-discrimination law to obtain insurance coverage for a transgender public employee denied transition-related care); *see also Diaz v. Brewer*, 656 F.3d 1008 (9th Cir. 2011) (counsel in federal class action suit that protected domestic partner health coverage for Arizona state employees after the legislature voted to strip that coverage from lesbians and gay men). I have personally litigated the majority of these cases.

B. Professional Qualifications and Application of Relevant Expertise to This Case

7. I graduated from the University of California, Berkeley School of Law in 2001, and have practiced law continuously since that time, including at the Los Angeles office of Proskauer Rose LLP and the Seattle law firm of Newman & Newman LLP (now, Newman DuWors LLP). Attached as Exhibit A is a true and correct copy of my resume.

8. Since 2006, I have worked full-time on civil rights cases for the LGBT community at Lambda Legal. I previously worked in Lambda Legal's Western Regional Office, which is based in Los Angeles, California, and I am currently based in the organization's Southern Regional Office, which is based in Atlanta, Georgia.

9. The recognition I have received for my legal work includes being named one of the Top 100 Lawyers in California by the Daily Journal (2012), and one of the Top Women Lawyers by the Daily Journal (2012).

10. I am admitted to the State Bars of California, Washington, and Georgia; the United States Courts of Appeals for the Fourth, Ninth, Eleventh, D.C., and Federal Circuits; and the United States Supreme Court.

11. The civil rights of transgender people, which is a core area of my work, is a specialized area of the law. For my work on this case, I drew heavily on the expertise that I have acquired in litigating cases challenging discrimination against transgender people, including, specifically, the denial of access to gender-confirming care.

12. I have extensive experience litigating the legal questions surrounding whether discrimination against transgender people constitutes unlawful sex discrimination, which I relied upon for the Title VII claim in this case. I have also litigated the more specific issue of whether the denial of access to gender-confirming care discriminates on the basis of sex, which was the ultimate question presented in this case.

13. I also have acquired significant subject matter knowledge regarding the health care needs of transgender people. I have worked extensively with health care professionals who provide care to transgender people, including the two expert witnesses who provided testimony in support of Plaintiff's motion for summary judgment, Dr. Randi Ettner and Dr. Loren Schechter. Both Dr. Ettner and Dr. Schechter are nationally renowned experts in their field with many competing demands for their time, and my

prior professional experience working with them assisted in securing their testimony here. Lambda Legal also advanced the expert witness fees required, bearing the risk that it would not be reimbursed if Ms. Fletcher did not prevail in the case.

14. I am not aware of any attorney in Alaska who possesses a comparable level of relevant subject matter expertise, which I believe was essential to the success achieved in this case. I closely follow legal developments regarding transgender people's access to gender-confirming care, and I am not aware of any other case in this district in which a represented party challenged the denial of gender-confirming health care when this case was filed on June 5, 2018. To my knowledge, this case was the first of its kind. Indeed, to date, it is still one of the very few cases filed within the Ninth Circuit challenging an exclusion of gender-confirming care as violating Title VII, and it is the only case in the circuit to reach a decision on the merits to my knowledge. Although I believe that the circumstances of this case would justify use of the prevailing rates where I am based (Atlanta, Georgia), which are higher than those sought here, Plaintiff's motion has only sought fees based on prevailing rates within the District of Alaska.

C. Requested Fees

15. Plaintiff's counsel reasonably staffed this case commensurate to its complexity as well as its significance to similarly situated transgender employees facing denial of potentially life-saving health care because of the exclusion at issue in this case.

16. Responsibilities in this case were allocated according to the experience and expertise of each attorney and who could perform each task efficiently. For example, I

relied heavily on a more junior attorney, Taylor Brown, to perform initial work relating to various discovery tasks. Although we do not seek any recovery for Ms. Brown's time, she expended at least 100 hours on this matter. We also relied upon attorney Eric Croft for his expertise with respect to local practice.

17. Additionally, other very senior attorneys performed work on this case as well by reviewing and editing key briefs, and consulting about strategy. These attorneys include Lambda Legal's Litigation Director Diana Flynn, and former Senior Counsel Kenneth Upton. In a further reduction to the fees sought here, Plaintiff's counsel seek no reimbursement for their time. This constitutes a significant reduction because their many decades of experience would command higher hourly rates. Plaintiff's counsel also seek no reimbursement for the multiple paralegals who expended significant time finalizing briefs for filing, reviewing documents, and managing case files – or for the law clerks who assisted with legal research – even though all of their time is fully compensable.

18. I am seeking fees for 243.7 hours of my work on this case at a requested rate hourly rate of \$375 per hour. (The hours reasonably expended by my colleague Peter Renn are separately set forth in his declaration.) Attached as Exhibit B is a true and correct copy of the task-based itemized charges for my time in this case, which I have reviewed and approved. The entries are based on contemporaneous recordings of time. I exercised billing judgment to ensure that the time spent was reasonable and necessary under the circumstances. As part of that process, I eliminated unnecessary, duplicative,

and excessive time. I have also discounted or eliminated certain entries for which fees could be appropriately sought.

19. The hours that I expended on this case were reasonable and necessary to achieve full success for Ms. Fletcher. The litigation itself spanned approximately two years, and the parties engaged in significant discovery, propounding and responding to requests for production, interrogatories, and requests for admission, and Defendant produced approximately 58,000 pages of documents. Plaintiff's counsel also met and conferred to address deficiencies in Defendant's discovery responses and thereby avoided the need for judicial intervention to resolve discovery disputes. The summary judgment briefing in this case was complex and required significant mastery of both the relevant law and facts.

20. My participation as counsel in this action required significant time and thus precluded other work that would have been done in its place.

21. Ms. Fletcher achieved an extremely high degree of success in the litigation, including a liability determination, injunctive relief benefiting all transgender state employees, and \$70,000 in economic and non-economic damages (which reflected compensation for approximately \$25,000 in out-of-pocket expenses and thus \$45,000 for emotional distress).

D. Requested Expenses

22. Attached as Exhibit C is true and correct copy of an itemized list of expenses reasonably incurred in litigating this case, such as expert witness fees. The total of these

expenses is \$10,516.26.

23. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: August 28, 2020

/s/ Tara L. Borelli (consent)

Tara L. Borelli

CERTIFICATE OF SERVICE

I hereby certify that on August 28, 2020, I electronically filed the foregoing document with the Clerk of the Court by using the CM/ECF system, causing a copy of the foregoing document and all attachments to be served on all counsel of record.

/s/ Peter C. Renn

Peter C. Renn (admitted *pro hac vice*)
Tara L. Borelli (admitted *pro hac vice*)
Eric Croft (Alaska Bar No. 9406031)

Attorneys for Plaintiff Jennifer Fletcher

EXHIBIT A



making the case for equality

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EDUCATION

University of California,
Berkeley, J.D., 2001

University of California,
Davis, B.A., 1998

BAR ADMISSIONS

California
Washington
Georgia

COURT ADMISSIONS

U.S. Supreme Court
U.S. Court of Appeals for
the Fourth Circuit
U.S. Court of Appeals for
the Ninth Circuit
U.S. Court of Appeals for
the Eleventh Circuit
U.S. Court of Appeals for
the D.C. Circuit
U.S. Court of Appeals for
the Federal Circuit
U.S. District Court for the
Central, Southern, and
Northern Districts of
California

Tara L. Borelli

Tara Borelli is Counsel in the Southern Regional Office of Lambda Legal, the oldest and largest national legal organization committed to achieving full recognition of the civil rights of LGBTQ people and people with HIV. Borelli's work focuses on bringing test cases to advance equality and liberty for LGBTQ people.

REPRESENTATIVE EXPERIENCE

Kadel v. Folwell, No. 1:19-cv-00272 (M.D.N.C.)

Counsel for North Carolina state employees and dependents denied access to gender-confirming health care under state employee insurance plan.

Adams v. St. Johns Cty. Sch. Dist., Fla., --- F.3d --- (11th Cir. 2020)

Counsel for transgender boy seeking the right to use the boys' restroom at his high school.

Being v. Crum, No. 3:19-cv-00060 (D. Ak.) (putative class action)

Counsel in putative class action challenging exclusion of transition-related care in Alaska's Medicaid program.

Karnoski v. Trump, No. 2:17-cv-01297 (W.D. Wash.)

Counsel in challenge to ban on open military service by transgender people.

Mize v. Pompeo, No. 1:19-cv-3331 (N.D. Ga.)

Local counsel in challenge to the U.S. State Department's refusal to recognize the citizenship of a married same-sex couple's daughter.

Gore v. Lee, No. 3:19-cv-00328 (M.D. Tenn.)

Counsel in challenge to Tennessee statute prohibiting transgender people from obtaining accurate birth certificates.

Ely v. Saul, No. 4:18-cv-00557, 2020 WL 2744138 (D. Ariz. May 27, 2020) (class action), *appeal docketed*, No. 20-16427

Colosimo v. Saul, No. 1:18-cv-00170 (W.D.N.C.)

Gonzales v. Saul, No. 1:18-cv-00603 (D.N.M.)

Counsel in lawsuits seeking access to Social Security benefits for same-sex spousal survivors blocked from qualifying by unconstitutional marriage laws. *Ely* was certified as a class action, and declared the denial of benefits unconstitutional.

 REPRESENTATIVE EXPERIENCE, cont'd

COURT ADMISSIONS, cont'd

U.S. District Court for the
Western District of
Washington

U.S. District Court for the
Northern District of
Georgia

U.S. District Court for the
Northern District of
Florida

Supreme Court of Georgia
Georgia Court of Appeals
Superior Court of DeKalb
County, State of
Georgia

Thornton v. Saul, No. 2:18-cv-01409 (W.D. Wash.) (putative class action)

Counsel in lawsuit seeking access to Social Security benefits for unmarried same-sex survivors blocked from qualifying by unconstitutional marriage laws.

Rolfingsmeyer v. OPM, No. 20-1735 (Fed. Cir.)

Counsel for amici curiae supporting a surviving spouse of a federal employee blocked from a survivor's annuity by unconstitutional marriage laws.

Lawrence v. Rigas, No. 510-2014-00396X (E.E.O.C.)

Counsel for transgender retiree in federal sector EEO proceedings seeking non-discriminatory access to health insurance coverage under Title VII.

Grimm v. Gloucester Cty. Sch. Bd., No. 19-1952 (4th Cir. 2020)

Parents for Privacy v. Barr, 949 F.3d 1210 (9th Cir. 2020)

Doe v. Boyertown Area Sch. Dist., 897 F.3d 518 (3d Cir. 2018)

Whitaker v. Kenosha Unified Sch. Dist., 858 F.3d 1034 (7th Cir. 2017)

Highland v. U.S. Dep't of Educ., 208 F. Supp. 3d 850 (S.D. Ohio 2016)

G.G. v. Gloucester Cty. Sch. Bd., 822 F.3d 709 (4th Cir. 2016) (vacated and remanded)

Counsel for amici curiae school administrators explaining why policies inclusive of transgender students are critical to uphold educators' obligation to treat all students equally.

Gender and Sexuality Alliance v. Spearman, No. 2:20-00847, 2020

WL 1227345 (D.S.C. March 11, 2020)

Counsel in challenge resulting in consent decree declaring South Carolina anti-LGBTQ curriculum law unconstitutional and barring its enforcement.

Fletcher v. Alaska, 443 F. Supp. 3d 1024 (D. Alaska 2020)

Counsel in case securing summary judgment on Title VII claim for transgender woman denied gender-confirming surgery by state employer.

Carcaño v. Cooper, No. 1:16-cv-236, 2019 WL 3302208 (M.D.N.C. July 23, 2019)

Counsel in case challenging North Carolina's H.B. 2, which targeted transgender people for discriminatory treatment in sex-separated facilities; secured consent decree ensuring nondiscriminatory access to public facilities.

REPRESENTATIVE EXPERIENCE, cont'd

Birchfield v. Armstrong, No. 4:15-cv-00615, 2017 WL 1433032 (N.D. Fla. March 23, 2017) (class action)
Counsel in class action case holding that State of Florida must provide corrected death certificates to same-sex widows and widowers who had been denied recognition of their marriage.

Carson v. Heigel, No. 3:16-cv-00045, 2017 WL 624803 (D.S.C. Feb. 15, 2017)
Counsel in suit holding that South Carolina's refusal to recognize same-sex spouses on birth certificates violates the Fourteenth Amendment.

Lively v. Fletcher Hospital, Inc., D/B/A Park Ridge Health, No. 1:16-CV-00031 (W.D.N.C. 2016)
Counsel in Title VII case challenging denial of spousal health coverage to employee's same-sex spouse; the matter was resolved.

Hall v. BNSF Ry. Co., No. 13-cv-2160, 2014 WL 4719007 (W.D. Wash. Sept. 22, 2014)
Counsel for amicus curiae supporting successful opposition to motion to dismiss complaint in challenge to employer's discriminatory denial of same-sex spousal health coverage.

Sevcik v. Sandoval, *consolidated for decision with Latta v. Otter*, 771 F.3d 496 (9th Cir. 2014)
Counsel in federal constitutional challenge that secured the freedom to marry for same-sex couples in Nevada and throughout the Ninth Circuit.

Inniss v. Aderhold, No. 1:14-cv-01180 (N.D. Ga. 2014)
Counsel in federal putative class action; secured judgment declaring Georgia's ban on marriage for same-sex couples unconstitutional.

Bostic v. Schaefer, 760 F.3d 352 (4th Cir. 2014)
Counsel for intervenor plaintiff class, certified in **Harris v. Rainey**, 299 F.R.D. 486 (W.D. Va. 2013), in case that secured access to marriage for same-sex couples in Virginia and throughout the Fourth Circuit.

GlaxoSmithKline v. Abbott Laboratories, 740 F.3d 471 (9th Cir. 2014)
Counsel for amici curiae arguing that sexual orientation-based peremptory strikes warrant heightened constitutional scrutiny and violate the federal Equal Protection Clause under *Batson v. Kentucky*, 476 U.S. 79 (1986), which the court held in its decision.

United States v. Windsor, 133 S. Ct. 2675 (2013)
Counsel for amici curiae arguing that Section 3 of the federal Defense of Marriage Act ("DOMA") required meaningful constitutional scrutiny.

Diaz v. Brewer, 656 F.3d 1008 (9th Cir. 2011)
Counsel in federal class action suit that protected domestic partner health coverage for Arizona state employees after the legislature voted to strip that coverage from lesbians and gay men.

Golinski v. U.S. Office of Personnel Management, 824 F. Supp. 2d 968 (N.D. Cal. 2012)
Counsel for plaintiff challenging DOMA; obtained district court ruling that DOMA is unconstitutional, and that classifications based on sexual orientation are entitled to heightened constitutional review.

REPRESENTATIVE EXPERIENCE, cont'd

Esquivel v. State of Oregon, No. 11C17487 (Or. Cir. Ct. 2011)

Counsel in a first-of-its-kind lawsuit deploying state anti-discrimination law to obtain insurance coverage for a transgender public employee denied transition-related care; resulted in settlement removing restrictions on transition-related care for all transgender employees of the State of Oregon.

Young v. Abercrombie, No. 10-1-1621-07 (Haw. Cir. Ct. 2010)

Counsel in a challenge seeking civil unions for same-sex couples in Hawaii, which the legislature approved in 2011 after Lambda Legal filed its lawsuit.

Munson v. Del Taco, Inc., 46 Cal. 4th 661 (2009)

Counsel for amici curiae HIV service providers throughout California, successfully arguing that California's public accommodations law does not impose a separate intent requirement for individuals who have proven a violation of the Americans with Disabilities Act.

Strauss v. Horton, 46 Cal. 4th 364 (2009)

Counsel for petitioners in writ of mandate involving California's Prop. 8; the court ruled that the 18,000 same-sex couples who married before Prop. 8's enactment remain validly married.

Cal. Educ. Comm. v. Schwarzenegger, No. 07-02246 (S.D. Cal. 2008)**Cal. Educ. Comm. v. Schwarzenegger**, No. 37-2008-00077546 (Cal. Super. Ct. San Diego 2008)**Cal. Educ. Comm. v. O'Connell**, No. 34-2008-00026507 (Cal. Super. Ct. Sacramento 2009)

Counsel for proposed intervenor and amici curiae seeking to defend California laws that protect lesbian, gay, bisexual and transgender students; after initial proceedings in each case, defendants voluntarily dismissed all challenges.

Ellis v. Arriaga, 162 Cal. App. 4th 1000 (Cal. App. 4th 2008)

Counsel in appeal confirming that registered domestic partners have the same rights and responsibilities as different-sex spouses under California state law.

deGroen v. City of Bellevue, No. 07-2-12286-9 (Wash. Super. Ct. 2007)

Counsel for plaintiff city employees seeking domestic partner health coverage; resulted in a city policy change granting the relief sought in the suit.

RECOGNITION AND AWARDS

Barry Goldwater Human Rights Award, Equality Arizona (2013)**Top 100 Lawyers in California**, *Daily Journal* (2012)**Top Women Lawyers of 2012**, *Daily Journal* (2012)**2012 Legal Service Award**, Bay Area Lawyers for Individual Freedom (2012)**Honoree**, EEOC San Francisco District Office LGBT Pride Celebration (2012), for work on *Golinski v. OPM***Certificates of Recognition** presented by the California State Assembly (2012) and California State Senate (2012), for work on *Golinski v. OPM***Best Lesbian, Gay, Bisexual and Transgender (LGBT) Lawyers Under the Age of 40 Award**, National LGBT Bar Association (2011)**Chancellor's Community Service Award**, University of California, Berkeley (2001)

PROFILED

“Top 100 Lawyers in California,” *Daily Journal* (September 12, 2012)
“Tara Borelli Is A Valued Lambda Legal Team Member,” *LawCrossing.com* (June 8, 2012)
“Top Women Lawyers of 2012,” Tara L. Borelli, *Daily Journal* (May 9, 2012)

OTHER RELEVANT EMPLOYMENT

Newman DuWors LLP, then Newman & Newman, LLP, Seattle, Washington (2005-2006)
Contract attorney and associate at law firm with an emphasis on intellectual property litigation.

Break the Cycle, Los Angeles, California (2003-2005)
Senior Staff Attorney with a focus on assisting young adult survivors of domestic violence with restraining order and family law proceedings.

Proskauer Rose LLP, Los Angeles, California (2001-2003)
Associate in the Litigation Department.

APPOINTMENTS

Gay & Lesbian Medical Association (2013, 2011)
Member of the Gay & Lesbian Medical Association’s (“GLMA”) Conference Peer-Review Committee, which reviews and evaluates workshop proposals for GLMA’s Annual Conference.

The Joint Commission (Sept. 2010 – Oct. 2011)
Member of Expert Advisory Panel for publication, “The Joint Commission: Advancing Effective Communication, Cultural Competence, and Patient- and Family-Centered Care for the Lesbian, Gay, Bisexual, and Transgender (LGBT) Community: A Field Guide,” released Oct. 2011.

Mautner Project, National Lesbian Health Organization (March 2010 – March 2011)
Member of the Mautner Project’s Technical Advisory Council.

LifeWorks Mentoring, now with the L.A. Gay & Lesbian Center (Dec. 2007 – Dec. 2008)
Member of the Board of Directors and Program Committee Chair.

REPRESENTATIVE SPEAKING ENGAGEMENTS

LGBTQ+ Lawyers Association of Los Angeles, August 20, 2020 (virtual)
Provided CLE course regarding the Eleventh Circuit’s ruling in *Adams v. St. Johns County School Board*, and the status of protections for transgender students throughout the country.

Grady Health System Gender Center, May 4, 2020 (virtual)
Provided presentation to medical providers who serve the Grady Health System Gender Center in Atlanta, Georgia health care protections for transgender people, and related impact litigation.

Merrill Lynch, March 12, 2020, Chattanooga, Tennessee

Provided presentation regarding Lambda Legal's work to Merrill Lynch employees, with a focus on the organization's impact litigation in the South.

Vanderbilt Law School, "Social Justice and the Legal Profession," October 21, 2019, Nashville, Tennessee

Participated in panel discussion discussing public interest lawyering to enforce *Obergefell v. Hodges*, and advancing LGBT rights.

Osborn Maledon, P.A., "Transgender Students: Bathrooms and Beyond," April 18, 2019, Phoenix, Arizona

Provided presentation to clients of the firm's education law practice about developments in the law regarding transgender students.

State Bar of Georgia, Institute of Continuing Legal Education, Family Law Issues for the Modern Family, "Surveying the Landscape of Current Legal Cases Relevant to Your Transgender Client," March 14, 2019, Atlanta, Georgia

Provided CLE course reviewing current legal issues facing families with transgender children.

Stonewall National Education Project, Plenary, "Looking Ahead: Where We Are in the Courts Towards Achieving Trans Equity in Schools," March 5, 2019, Boca Raton, Florida

Participated in plenary panel discussion of status of federal legal protections for transgender students.

Virginia Equality Bar Association, "How Transgender Litigation is Shaping Sex Discrimination Law," October 26, 2018, webinar

Provided CLE presentation regarding the way in which sex discrimination jurisprudence is being shaped by cases on behalf of transgender plaintiffs.

Voices for Trans Youth Campaign, "Legal Rights Workshop," March 24, 2018, Knoxville, Tennessee

Participated in panel discussion regarding the status of federal protections for transgender youth.

State Bar of Georgia, Institute of Continuing Legal Education, Family Law Issues for the Modern Family, March 15, 2018, Atlanta, Georgia

Provided update on family-law related impact cases seeking to implement *Obergefell v. Hodge's* mandate of equal access to marriage.

Morehouse College, April 19, 2018, Atlanta, Georgia

Provided lecture to sociology course on civil rights and social movements, as illustrated by the LGBT advocacy movement.

Eversheds Sutherland, "Transgender Rights," June 29, 2017, Atlanta, Georgia

Participated in panel broadcast to Eversheds Sutherland's offices across the country regarding the state of transgender rights and litigation developments.

Emory University School of Law, OUTLaw Conference, “State of the Union,” January 14, 2017, Atlanta, Georgia

Participated in panel discussion focusing on the state of marriage equality after *Obergefell v. Hodges*, and ongoing efforts to implement that landmark ruling.

National Organization of Lawyers for Education Associations, “Transgender Student Rights: Cutting Edge Legal Developments & Best Practices,” October 6, 2016, Boston, Massachusetts

Provided session on the current state of legal protections for transgender students, and best practices for supporting them in schools.

Vanderbilt Law School, “Practicing Public Interest Law in the South Conference,” September 10, 2016, Nashville, Tennessee

Participated in panel discussion regarding public interest career pathways to LGBTQ+ advocacy.

White & Case LLP, “Civil Rights Roundtable,” June 15, 2016, Miami, Florida

Participated in panel discussion regarding recent legal developments in cases involving the LGBT community, gender equity, and racial equality.

Georgia State University College of Law, March 9, 2016, Atlanta, Georgia

Provided guest lecture on the strategy behind the marriage equality victory in *Obergefell v. Hodges*.

U.S. Equal Employment Opportunity Commission, Select Task Force on the Study of Harassment in the Workplace, December 7, 2015, Washington, D.C.

Provided testimony regarding dynamics unique to harassment based on sexual orientation and gender identity in the workplace.

Bryan Cave LLP, Retreat for LGBT Attorneys, October 24, 2014, Washington D.C.

Speaker for firm reception regarding the state of marriage equality litigation, and the role of private law firms in such litigation across the country.

American Association for Justice, “Same Sex Marriage—Changing Laws, Societal Needs, and the Impact on Marriage, Divorce and Child Custody,” July 20, 2013, San Francisco, California

Panel discussion analyzing the effect of *United States v. Windsor*, *Hollingsworth v. Perry*, and other national developments on family law issues for same-sex couples.

Anti-Defamation League, “State of the Union: Marriage Equality Cases at the Supreme Court,” April 4, 2013, Los Angeles, California

CLE course analyzing the March 26 and 27, 2013 oral arguments the Supreme Court held in *United States v. Windsor* and *Hollingsworth v. Perry*.

Sheppard Mullin Richter & Hampton LLP, Retreat for LGBT Attorneys, Oct. 19, 2012, Los Angeles, California

CLE course reviewing trends in litigation surrounding marriage equality, Section 3 of DOMA, and health coverage for domestic partners and transgender employees.

State Bar of Texas Annual Meeting, “Breaking News: Updates on DOMA and Beyond,” June 15, 2012, Houston, Texas (via teleconference)
CLE course on developing litigation and jurisprudence surrounding the federal “Defense of Marriage Act,” and marriage equality litigation for same-sex couples.

Morrison & Foerster, LLP, “LGBT Legal Update: Is the Door Closing on DOMA?” December 6, 2011, San Francisco, California
Panel discussion analyzing legal challenges across the country to Section 3 of DOMA.

Irell & Manella, LLP, December 6, 2010, Los Angeles, California
Panel discussion analyzing the U.S. Ninth Circuit Court of Appeals oral arguments in *Perry v. Brown*, the federal marriage equality challenge to California’s Proposition 8.

Davis Wright Tremaine, LLP and Microsoft Corporation, “Marriage, Democracy, The First Amendment and Federalism,” October 25, 2010, Seattle and Redmond, Washington
Panel discussions at the law firm of Davis Wright Tremaine, LLP and the Microsoft Corporation campus regarding marriage equality and free speech developments in Washington and the U.S. Supreme Court.

Gay & Lesbian Medical Association, September 22-23, 2010, San Diego, California
Workshop entitled “Legal Trends in Fighting Health Care Discrimination: Eliminating Insurance Barriers for LGBT People and People with HIV,” and led a luncheon discussion reviewing recent relationship recognition developments for same-sex couples.

Lesbian and Gay Psychotherapy Association of Los Angeles, “Civil Rights Litigation Update,” June 27, 2010, Beverly Hills, California
Continuing education course for mental health professionals regarding marriage equality litigation across the country.

University of Southern California, Transgender Studies Class, November 4, 2009, Los Angeles, California
Participated in a panel discussing best practices in representation of and advocacy for transgender adolescents.

Equality Hawaii, “Family Equality Coalition Community Forum: Legal Perspectives on the Equality Movement,” August 13, 2009, Honolulu, Hawaii
Panel discussing the evolving relationship recognition landscape nationally for same-sex couples, and Hawaii’s unique contribution to that movement. The panel included Hawaii Supreme Court Justice Levinson (Ret.), who authored *Baehr v. Lewin*, which launched the modern marriage equality movement.

Southern California Lambda Medical Association Banquet, Keynote Address, June 15, 2008, Los Angeles, California
Keynote address regarding the California Marriage Cases and litigation relating to healthcare fairness, including legal considerations relating to the intersection of state civil rights laws and physicians’ religious objections.

Washington Appellate Judges' Conference, "Update on Marriage Litigation, Legislation and the State of Same Sex Unions," April 7, 2008, Hood Canal, Washington
Forum for Washington appellate judges regarding the status of marriage litigation for same-sex couples and recent legislative changes to registered domestic partnership in Washington.

American Academy of Matrimonial Lawyers, "Custody Litigation with Same-Sex Couples and Domestic Partnership Update," March 21, 2008, Seattle, Washington
CLE course regarding relationship recognition protections for same-sex couples nationally, and recent legislative changes to registered domestic partnership in Washington.

Annual Southern California Employment Round Table, "Transgender Discrimination – Understanding a Very Complex Topic," Nov. 8, 2007, Los Angeles, California
CLE course regarding employment protections in California for transgender people and developments in Title VII cases involving transgender plaintiffs nationally.

MCLE Course, "Update on Marriage Litigation/Legislation and the State of Same Sex Unions," Oct. 16, 2007, Seattle, Washington
CLE course about relationship recognition for same-sex couples, developments in domestic partnership laws in California and Washington, and issues raised by cross-jurisdiction actions for dissolution of same-sex relationships.

Press Conference Announcing the Filing of Amicus Curiae Brief by 63 Asian American Organizations in the "In Re Marriage Cases" California Marriage Equality Case Before the California Supreme Court, Sept. 26, 2007, Los Angeles, California
Provided comments on behalf of the party counsel and clients in the California marriage equality case recognizing the historic and uniquely authoritative amicus curiae brief filed by a coalition of Asian American advocacy organizations.

Medical Student Training, USC Keck School of Medicine, "An Introduction to Culturally Competent Healthcare for Lesbian, Gay, and Bisexual Patients," Sept. 10, 2007; Sept. 18, 2006, Los Angeles, California
Provided training about disparate health outcomes for LGBT patients, and culturally sensitive practices for medical care providers treating LGBT patients.

MCLE Course, "Volunteer Attorney Educator Training: Domestic Violence and the Law," Sept. & Oct. 2003, March 2004, January 2005, Los Angeles, California
CLE course about dynamics of domestic violence experienced by teens, preventive strategies, and laws related to mandated reporting.

In-Service Training, Youth Organizations Understanding Today's Health Risks Conference, "Transgendered & Intersex Youth and Domestic Violence," April 30, 2004, Los Angeles, California
Training about unique dynamics experienced by transgender and intersex youth in abusive relationships, and legal and non-legal remedies for youth seeking protection from an abusive partner.

EXHIBIT B

Fletcher v. State of Alaska
Time Sheet for Counsel Tara Borelli

Date	Time	Billing Judgment	Description	Hourly Rate	Total
4/9/2018	0.7		Telephone conferences with Mr. Renn re: representation of Ms. Fletcher in EEOC proceedings, and related strategy.	\$375.00	\$262.50
4/9/2018	0.6		Telephone conference with Mr. Renn & Ms. Fletcher re: representation in EEOC proceedings.	\$375.00	\$225.00
4/11/2018	0.8		Telephone conference with Mr. Renn re: potential claims, and document collection.	\$375.00	\$300.00
4/12/2018	1		Legal research re: statute of limitations issues (.6); review documents from client in connection with same (.4).	\$375.00	\$375.00
4/15/2018	0.3		Draft analysis of statute of limitations issues for Mr. Renn.	\$375.00	\$112.50
4/18/2018	0.5		Teleconference with Mr. Renn, Mr. Nevins, and Mr. Levasseur (Lambda Legal attorneys) re: representation of Ms. Fletcher, and strategy for her claims.	\$375.00	\$187.50
4/19/2018	0.3		Email Ms. Fletcher re: status of settlement negotiations with the State, EEOC investigation, and collection of records.	\$375.00	\$112.50
4/20/2018	0.2		Teleconference with Mr. Renn re: EEOC developments.	\$375.00	\$75.00
4/20/2018	0.2		Respond to client's questions about status of settlement negotiations with the State.	\$375.00	\$75.00
4/21/2018	0.2		Draft/prepare co-counsel agreement with Croft Law.	\$375.00	\$75.00
4/21/2018	0.5		Prepare preliminary drafts of case-initiating documents.	\$375.00	\$187.50
4/23/2018	0.6	No charge	Legal research re: availability of claims for damages under state constitution (.4); send analysis of same to Mr. Renn & Mr. Croft (.2).	\$375.00	\$0.00
4/23/2018	0.7	No charge	Teleconferences with Mr. Renn re: strategy surrounding potential state law claims (.2) and Affordable Care Act claim (.5).	\$375.00	\$0.00
4/25/2018	1.3		Telephone conference with Mr. Renn & Mr. Croft re: theories and strategy surrounding filing suit on Ms. Fletcher's behalf.	\$375.00	\$487.50
5/3/2018	0.1		Confer with Suporn Clinic re: requesting Ms. Fletcher's medical records.	\$375.00	\$37.50
5/3/2018	0.5		Teleconference with Mr. Renn and Ms. Brown to discuss procedural posture and research re: medical records.	\$375.00	\$187.50
5/4/2018	0.2	No charge	Confer with Mr. Renn about potential Affordable Care Act claim.	\$375.00	\$0.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
5/8/2018	0.2		Email Ms. Fletcher re: collecting medical records from Suporn clinic (.1); email Suporn clinic re: same (.1).	\$375.00	\$75.00
5/9/2018	0.5		Confer with Ms. Brown re: complaint drafting and related research.	\$375.00	\$187.50
5/12/2018	0.2		Email Suporn Clinic re: medical records request (.1); email Ms. Fletcher re: medical record collection process from various providers (.1).	\$375.00	\$75.00
5/14/2018	0.2		Email Ms. Fletcher re: draft client retainer agreement and HIPAA forms.	\$375.00	\$75.00
5/14/2018	0.3		Teleconference with Ms. Fletcher and Mr. Renn re: preparing for filing suit.	\$375.00	\$112.50
5/15/2018	0.3		Confer with Ms. Davidson (paralegal) re: status of medical records collection (.2); review and finalize medical records requests (.1).	\$375.00	\$112.50
5/15/2018	0.1		Email Litigation Director, Ms. Flynn, re: client retainer and co-counsel agreements.	\$375.00	\$37.50
5/15/2018	0.2		Email Ms. Fletcher re: status of medical records collection, and document preservation.	\$375.00	\$75.00
5/15/2018	0.4		Read/review Ms. Brown's memo re: CA statutory rights to obtain copies of psychotherapist records (.2); draft email to Ms. Brown & Mr. Renn re: collection of Dr. Vitale's medical records (.2).	\$375.00	\$150.00
5/16/2018	0.1		Read/review medical records from Dr. Vitale.	\$375.00	\$37.50
5/16/2018	0.2		Confer with Mr. Renn re: Segal consulting group report produced for the State re: trans-inclusive health care.	\$375.00	\$75.00
5/17/2018	2.3	No charge	Legal research re: third party administrator of health plan as "agent" under Title VII (2.1); prepare analysis for Mr. Renn and Ms. Brown (.2).	\$375.00	\$0.00
5/17/2018	0.1		Email Mr. Renn re: client retainer agreement.	\$375.00	\$37.50
5/17/2018	1.7	No charge	Legal research re: ACA claim against third-party administrator of health plan.	\$375.00	\$0.00
5/18/2018	0.1		Email Ms. Fletcher re: status of right to sue letter.	\$375.00	\$37.50
5/18/2018	0.1		Teleconference with Mr. Renn re: requesting EEOC charge file.	\$375.00	\$37.50
5/18/2018	5.5	No charge	Legal research re: possible ACA claim against State of Alaska (1.4); legal research re: possible ACA claim against Aetna (3.6); draft analysis re: same for Mr. Renn and Ms. Brown (.5).	\$375.00	\$0.00
5/19/2018	0.9		Research re: structure of authority for public employee health plan terms in Alaska (.7); draft analysis re: same for Mr. Renn and Ms. Brown (.2).	\$375.00	\$337.50
5/21/2018	0.1	No charge	Legal research re: notice of constitutional challenge under FRCP 5.1.	\$375.00	\$0.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
5/21/2018	0.3		Draft/prepare correspondence enclosing complaint and initiating documents, and waiver of service.	\$375.00	\$112.50
5/21/2018	0.2		Prepare notice of lawsuit and request for waiver of service forms (.1); consult FRCP 4 (.1).	\$375.00	\$75.00
5/24/2018	1.1		Edit/revise draft complaint.	\$375.00	\$412.50
5/25/2018	0.9		Continue editing complaint, including for compliance with local rules.	\$375.00	\$337.50
5/25/2018	0.4		Teleconference with Mr. Renn re: edits to complaint from Senior Counsel Mr. Upton.	\$375.00	\$150.00
5/25/2018	0.3		Teleconference with Mr. Upton re: medical records collection (.2); call with Mr. Renn re: same (.1).	\$375.00	\$112.50
5/25/2018	0.9		Teleconference with Mr. Renn and Ms. Fletcher re: factual allegations in the complaint, document collection, and preparation for filing the suit.	\$375.00	\$337.50
5/25/2018	0.2		Implement Mr. Upton's edits to the complaint.	\$375.00	\$75.00
5/26/2018	0.9		Read/review Ms. Fletcher's emails from 5-24 to 5-25, and attached communications with the state (.2); review Southeast medical records & update tracking notes for medical records collection (.7).	\$375.00	\$337.50
5/26/2018	0.1		Email Ms. Fletcher re: status of document collection and draft complaint.	\$375.00	\$37.50
5/26/2018	0.1		Follow-up email to Ms. Fletcher re: medical records collection.	\$375.00	\$37.50
5/29/2018	0.1		Email Ms. Fletcher re: status of document collection.	\$375.00	\$37.50
5/30/2018	0.2		Review status of medical records collection (.1); confer with Ms. Davidson (paralegal) re: same (.1).	\$375.00	\$75.00
5/30/2018	0.4		Read/review medical records from Dr. Raster (.1), and Dr. Perez (.3).	\$375.00	\$150.00
5/30/2018	0.2		Review correspondence from EEOC (.1); email Ms. Fletcher re: same (.1).	\$375.00	\$75.00
6/3/2018	0.3		Finalize summons and civil cover sheet (.2); draft email to Court Clerk for filing new civil case (.1).	\$375.00	\$112.50
6/4/2018	0.1		Email Ms. Brown and Mr. Renn re: calendaring initial deadlines in the case.	\$375.00	\$37.50
6/4/2018	0.1		Email Mr. Croft case-initiating documents for review.	\$375.00	\$37.50
6/4/2018	0.7		Proofread and revise complaint.	\$375.00	\$262.50
6/4/2018	0.2		Implement edits from legal team to complaint.	\$375.00	\$75.00
6/4/2018	0.5		Call court clerk re: local rule requirements for initiating suit (.1); email legal team re: same (.2); update waiver of service packet (.2).	\$375.00	\$187.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
6/5/2018	0.4		Review correspondence from clerk re: opening of case (.1); finalize case-initiating documents with assigned case number and file them (.3).	\$375.00	\$150.00
6/5/2018	0.3		Finalize and file pro hac vice applications.	\$375.00	\$112.50
6/5/2018	0.1		Call court clerk's office re: summons.	\$375.00	\$37.50
6/5/2018	0.2		Call AG's office re: request to waive service.	\$375.00	\$75.00
6/6/2018	0.3		Prepare service packet for Attorney General.	\$375.00	\$112.50
6/7/2018	0.1	No charge	Review email from Mr. Renn re: potential additional plaintiff for the suit.	\$375.00	\$0.00
6/7/2018	0.3		Update service packet to reflect pro hac vice admission (.1); confer with paralegal (.1); proofread packet before transmission (.1).	\$375.00	\$112.50
6/7/2018	0.2	No charge	Legal research re: amending complaint after request for waiver of service is transmitted (.1); email Mr. Renn and Ms. Brown re: same (.1).	\$375.00	\$0.00
6/12/2018	0.5	No charge	Teleconference with second potential plaintiff.	\$375.00	\$0.00
6/26/2018	0.1		Email Mr. Renn re: Alaska AG voicemail message re: service of process.	\$375.00	\$37.50
6/26/2018	0.3		Return call from Alaska AG re: service of process with Mr. Renn.	\$375.00	\$112.50
6/27/2018	0.2		Revise cover letter for service on AG's office by certified mail.	\$375.00	\$75.00
7/17/2018	0.3		Review local rules re: extensions of time to respond to a complaint, and edit draft stipulation from Mr. Milks.	\$375.00	\$112.50
7/19/2018	0.6		Edit/revise draft protective order prepared by Ms. Brown.	\$375.00	\$225.00
8/30/2018	1.4		Teleconference with Mr. Renn re: Rule 26 report, and status of draft discovery.	\$375.00	\$525.00
8/31/2018	0.9		Rule 26 conference with opposing counsel, Mr. Renn, and Ms. Brown (.7); teleconference with Mr. Renn and Ms. Brown to debrief (.2).	\$375.00	\$337.50
9/19/2018	0.3		Edit/revise draft initial disclosures & preliminary witness list prepared by Ms. Brown.	\$375.00	\$112.50
9/28/2018	0.2		Review Def.'s edits to protective order, and redline further revisions in draft.	\$375.00	\$75.00
9/28/2018	1.2		Teleconference with Mr. Renn and Ms. Brown re: discovery and motion for summary judgment strategy issues.	\$375.00	\$450.00
10/4/2018	1.1		Teleconference with Dr. Ettner, Mr. Renn & Ms. Brown re: expert testimony.	\$375.00	\$412.50
10/4/2018	0.1		Edit/revise draft expert retainer agreement for Dr. Ettner.	\$375.00	\$37.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
10/6/2018	1.3		Annotate medical records with internal analysis in preparation for transmitting to Dr. Ettner (1.2); email Mr. Renn & Ms. Brown internal analysis (.1).	\$375.00	\$487.50
10/6/2018	0.9		Edit/revise Ms. Brown's draft interrogatories.	\$375.00	\$337.50
10/7/2018	1.4		Edit/revise Ms. Brown's draft requests for production of documents (.8) and requests for admissions (.6).	\$375.00	\$525.00
10/13/2018	0.8		Draft/prepare subpoena to Aetna for Ms. Fletcher's medical claim files.	\$375.00	\$300.00
10/17/2018	0.3		Edit/revise draft discovery requests to incorporate Mr. Renn's edits.	\$375.00	\$112.50
10/18/2018	0.3		Edit/revise subpoena to Aetna for Ms. Fletcher's medical claim files (.2); transmit to Mr. Renn & Ms. Brown for review (.1).	\$375.00	\$112.50
10/18/2018	0.5		Call with Dr. Ettner and Mr. Renn re: plaintiff's medical records, and planning for in-person evaluation of plaintiff.	\$375.00	\$187.50
10/21/2018	0.8		Prepare initial draft of expert declaration for Dr. Ettner based on her testimony in Edmo.	\$375.00	\$300.00
10/22/2018	0.2		Edit/revise draft Dr. Ettner declaration to implement Mr. Renn's edits (.1); transmit draft declaration to Dr. Ettner (.1).	\$375.00	\$75.00
10/27/2018	0.9		Teleconference with Ms. Fletcher, Mr. Renn, and Mr. Croft to discuss potential settlement of claims.	\$375.00	\$337.50
10/29/2018	0.7		Settlement conference call with Mr. Renn, Mr. Croft, and opposing counsel (.5); debrief settlement call with Mr. Renn and Mr. Croft (.2).	\$375.00	\$262.50
11/5/2018	0.2		Call with V. Little from Aetna re: plaintiff's subpoena for documents (.1); email Lambda co-counsel re: same (.1).	\$375.00	\$75.00
11/8/2018	0.2		Correspondence with Aetna re: status of compliance with subpoena for plaintiff's medical records.	\$375.00	\$75.00
11/13/2018	0.4		Email client (.1) and Dr. Ettner (.1) re: upcoming visit for Ms. Fletcher's evaluation by Dr. Ettner. Review and finalize additional medical records to transmit to Dr. Ettner (.2).	\$375.00	\$150.00
11/13/2018	0.2		Confer with Lambda co-counsel, and paralegal, re: certified translation for medical records written in Thai, from Suporn Clinic.	\$375.00	\$75.00
11/21/2018	0.6		Teleconference with Mr. Renn & Dr. Ettner re: examination of Ms. Fletcher (.5); email to Ms. Fletcher re: same (.1).	\$375.00	\$225.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
12/3/2018	1.2		Teleconference with Dr. Ettner re: draft report re: evaluation of Ms. Fletcher (1); teleconference with Mr. Renn re: same (.2).	\$375.00	\$450.00
12/4/2018	0.5		Teleconference with Mr. Renn re: Dr. Ettner's evaluation of Ms. Fletcher.	\$375.00	\$187.50
12/13/2018	1		Call w/ Mr. Renn & Dr. Ettner re: draft expert report re: evaluation of Ms. Fletcher.	\$375.00	\$375.00
12/21/2018	1.4		Review and analyze Def's responses to Pltf's first RFAs (.3); rogs (.2); and RFPs (.4) for deficiencies; meet with Ms. Brown to discuss the same (.5).	\$375.00	\$525.00
1/16/2019	1.6		Review Def's written discovery responses to identify admissions for summary judgment findings of fact & conclusions of law.	\$375.00	\$600.00
1/16/2019	0.8		Review and draft analysis of Defendant's doc production SOA – 000001 - 000237.	\$375.00	\$300.00
1/17/2019	2.2		Review and draft analysis of Defendant's document production SOA - 000238 - 001379.	\$375.00	\$825.00
1/18/2019	1.2		Legal team call w/ Mr. Renn and Ms. Brown re: status of expert reports, written discovery, and summary judgment draft.	\$375.00	\$450.00
1/18/2019	0.1	No charge	Email J. Knight to request copies of expert reports submitted in Boyden.	\$375.00	\$0.00
1/18/2019	0.5		Review deposition transcript of potential expert Dr. Schechter to evaluate his retention as an expert in this matter.	\$375.00	\$187.50
1/18/2019	0.2		Email Dr. Ettner re: deadline for draft expert report (.1); email potential expert Dr. Schechter with request to consult (.1).	\$375.00	\$75.00
1/22/2019	0.6		Call with potential expert, Dr. Schechter, to discuss providing testimony in this case.	\$375.00	\$225.00
1/22/2019	0.2		Prepare expert retainer agreement for Dr. Schechter.	\$375.00	\$75.00
1/22/2019	0.1	No charge	Email <i>Flack</i> attorneys re: coordinating Dr. Schechter's expert testimony in both cases.	\$375.00	\$0.00
1/31/2019	1.1		Teleconference with Mr. Renn and Ms. Brown re: division of tasks for discovery and summary judgment.	\$375.00	\$412.50
2/1/2019	0.2		Email outline of responsibilities and deadlines for summary judgment motion to legal team.	\$375.00	\$75.00
2/2/2019	2.3		Edit/revise draft Dr. Schechter expert report.	\$375.00	\$862.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
2/3/2019	2.8		Draft prepare letter to Defendant re: deficiencies in Defendant's responses to plaintiff's first set of RFAs, rogs, and RFPs (1.8); legal research for supporting authorities (1).	\$375.00	\$1,050.00
2/4/2019	0.3		Edit/revise draft letter re: deficiencies in Def's discovery responses.	\$375.00	\$112.50
2/6/2019	1		Teleconference with Mr. Renn and Ms. Brown to discuss revisions to expert reports for Dr. Ettner and Dr. Schechter.	\$375.00	\$375.00
2/8/2019	0.1		Email Mr. Renn and Ms. Brown re: strategy surrounding meet and confer re: deficiencies in Def's discovery responses.	\$375.00	\$37.50
2/8/2019	0.7		Teleconference with Dr. Schechter, Mr. Renn, & Ms. Brown regarding revisions to expert report.	\$375.00	\$262.50
2/8/2019	0.3		Edit/revise cost-effectiveness and affordability material for Dr. Ettner's expert report.	\$375.00	\$112.50
2/9/2019	0.1		Proofread cost-effectiveness and affordability material for Dr. Ettner's expert report, and transmit to Mr. Renn and Ms. Brown for review.	\$375.00	\$37.50
2/11/2019	0.3		Review Ms. Brown's edits to Dr. Schechter expert report, and further revise draft.	\$375.00	\$112.50
2/12/2019	0.2		Confer with Ms. Brown (.1) and paralegal (.1) re: bibliography for Dr. Schechter's report.	\$375.00	\$75.00
2/12/2019	0.2		Review Dr. Ettner's expert report with additional material from Dr. Ettner re: evaluation of Ms. Fletcher.	\$375.00	\$75.00
2/12/2019	0.1		Review Dr. Schechter's report to finalize for his signature.	\$375.00	\$37.50
2/12/2019	0.1		Implement additional change to expert report requested by Dr. Ettner.	\$375.00	\$37.50
2/13/2019	0.2		Email Mr. Renn & Ms. Brown re: sources relevant to Dr. Schechter's report.	\$375.00	\$75.00
2/13/2019	0.1		Transmit expert report to Dr. Schechter for signature.	\$375.00	\$37.50
2/14/2019	0.6		Prepare for meet and confer call with Defendant re: deficiencies in their discovery responses (.3); strategy teleconference re: same with Mr. Renn and Ms. Brown (.3).	\$375.00	\$225.00
2/14/2019	1.7		Meet and confer re: deficiencies in defendant's discovery responses with Mr. Dilg, Mr. Renn, Ms. Brown, and Mr. Croft (1.5); debrief call afterward with co-counsel (.2).	\$375.00	\$637.50
2/15/2019	0.3		Email Ms. Fletcher with discovery updates, including recent meet and confer, status of defendant's document production, and expert reports.	\$375.00	\$112.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
2/19/2019	0.1		Transmit signed medical records release to Mr. Dilg authorizing release of Aetna records to the state.	\$375.00	\$37.50
2/28/2019	0.3		Draft/prepare Plaintiff's First Amended Initial Disclosures.	\$375.00	\$112.50
3/1/2019	0.2		Finalize and serve Plaintiff's First Amended Initial Disclosures.	\$375.00	\$75.00
3/14/2019	0.7		Draft/prepare Plaintiff's Final Witness List, including review of all witnesses disclosed by both parties in discovery.	\$375.00	\$262.50
3/15/2019	1.2		Review Defendant's supplemental discovery responses for purposes of editing Plaintiff's Final Witness list (1); send analysis of same to Mr. Renn & Ms. Brown (.2).	\$375.00	\$450.00
3/16/2019	0.4		Review local rules re: requirements for filing summary judgment motion.	\$375.00	\$150.00
3/17/2019	0.7		Draft/prepare Dr. Ettner declaration for MSJ motion (.4); and Dr. Schechter declaration for MSJ motion (.3).	\$375.00	\$262.50
3/26/2019	0.3		Research and draft legal standard section of MSJ.	\$375.00	\$112.50
3/28/2019	0.4		Draft/prepare general objections to defendant's doc production requests.	\$375.00	\$150.00
3/29/2019	0.7		Review and annotate client's feedback on Defendant's written discovery requests (.5); email Mr. Renn & Ms. Brown with strategic questions re: same (.2).	\$375.00	\$262.50
3/29/2019	0.4		Review discovery transmittal letter bearing today's date from Mr. Dilg (.1); email client re: same (.1); email co-counsel re: same (.1); email Mr. Dilg re: his request to set call re: status of discovery (.1).	\$375.00	\$150.00
3/31/2019	1.4		Teleconference with Ms. Brown and Ms. Fletcher to collect information for Def's written discovery requests.	\$375.00	\$525.00
4/1/2019	0.1		Correspond with Mr. Dilg re: scheduling meet & confer to discuss status of discovery.	\$375.00	\$37.50
4/1/2019	2.4		Draft specific objections to defendant's doc production requests.	\$375.00	\$900.00
4/1/2019	0.1		Email client re: document collection for Def's document requests.	\$375.00	\$37.50
4/5/2019	0.9		Perform relevance review of Ms. Fletcher's social media posts for document production.	\$375.00	\$337.50
4/5/2019	0.8		Review 2,092-page EEOC file in connection with document production.	\$375.00	\$300.00
4/5/2019	1		Begin relevance review of documents attached to Ms. Fletcher's first email transmission on 4/1/2019 for document production.	\$375.00	\$375.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
4/6/2019	1.2		Perform relevance review of documents emailed by Mr. Dilg on 2/13/2019, including non-bates-stamped files collected by Def. from Aetna.	\$375.00	\$450.00
4/6/2019	0.4		Continue performing relevance review of documents attached to Ms. Fletcher's first email transmission on 4/1/19 for document production.	\$375.00	\$150.00
4/6/2019	0.3		Perform relevance review of documents attached to Ms. Fletcher's second email transmission on 4/1/19 for document production.	\$375.00	\$112.50
4/7/2019	2.8		Perform relevance review of client documents transmitted to Lambda Legal at the beginning of litigation for document production.	\$375.00	\$1,050.00
4/9/2019	0.8		Teleconference with Mr. Renn & Ms. Brown to prepare for 4/11/19 meet and confer with Mr. Dilg, and to discuss status of written discovery.	\$375.00	\$300.00
4/10/2019	0.7		Draft/prepare joint motion to vacate remaining deadlines in case schedule, and propose cross-MSJ briefing schedule (.6); implement Mr. Renn edits to same (.1).	\$375.00	\$262.50
4/10/2019	0.5		Perform relevance review of additional documents transmitted by Ms. Fletcher on 4/7/2019.	\$375.00	\$187.50
4/11/2019	0.3		Teleconference with Mr. Dilg re: status of discovery and respective document productions.	\$375.00	\$112.50
4/11/2019	0.6		Teleconference with Mr. Renn, Ms. Brown, and Mr. Croft to discuss effect of state's ongoing document production on case schedule, and strategy surrounding remaining discovery and case schedule.	\$375.00	\$225.00
4/14/2019	2.6		Edit/revise draft RFA responses prepared by Ms. Brown.	\$375.00	\$975.00
4/15/2019	0.8		Edit/revise draft rog responses prepared by Ms. Brown for rogs 8-12.	\$375.00	\$300.00
4/16/2019	0.1		Email Mr. Dilg re: status of draft stipulation to extend discovery.	\$375.00	\$37.50
4/16/2019	0.2		Edit/revise draft stipulation to extend discovery prepared by Mr. Dilg.	\$375.00	\$75.00
4/19/2019	0.5		Teleconference with Mr. Renn re: discovery schedule and related work.	\$375.00	\$187.50
4/22/2019	0.1		Email Mr. Dilg re: request for extension for pltf's discovery responses.	\$375.00	\$37.50
4/22/2019	0.1		Email client re: extended deadline for plaintiff discovery responses.	\$375.00	\$37.50
4/25/2019	0.7		Edit/revise draft rog responses prepared by Ms. Brown for rogs 2, 4, 5, 6, 7, and 13.	\$375.00	\$262.50
4/26/2019	1.4		Proofread draft discovery responses for circulation to Mr. Renn & Ms. Brown.	\$375.00	\$525.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
4/27/2019	2.7		Review additional documents from Ms. Fletcher to determine relevance and privilege (2.4); email Ms. Fletcher with additional instructions for collecting documents pursuant to Def's discovery requests (.3).	\$375.00	\$1,012.50
4/28/2019	3.4		Review additional documents from Ms. Fletcher to determine relevance and privilege.	\$375.00	\$1,275.00
5/7/2019	0.5		Edit/revise written objections and responses to Def's first discovery requests to implement Mr. Renn's edits (.3); email Mr. Renn & Ms. Brown re: further revisions based on additional information from client (.2).	\$375.00	\$187.50
5/8/2019	1.1		Review document production for needed redactions and confidential designations pursuant to protective order.	\$375.00	\$412.50
5/9/2019	2.3		Continue reviewing document production for needed redactions and confidential designations pursuant to protective order.	\$375.00	\$862.50
5/9/2019	0.3		Email Ms. Fletcher re: her comments and edits on draft discovery responses and objections.	\$375.00	\$112.50
5/13/2019	0.2		Prepare cover letter for Pltf's Responses to Def's First Discovery Requests.	\$375.00	\$75.00
5/13/2019	0.8		Review document production for quality control issues, and work with paralegal to ensure resolution of quality control issues.	\$375.00	\$300.00
5/13/2019	0.1		Email Mr. Dilg re: consent to electronic service of Pltf.'s discovery responses.	\$375.00	\$37.50
5/19/2019	0.4		Draft proposed joint motion for 4-brief MSJ schedule and extension of case schedule.	\$375.00	\$150.00
5/20/2019	0.2		Implement Mr. Renn's edits to 4-brief MSJ schedule and extension of case schedule (1.); transmit the same to Mr. Croft (.1).	\$375.00	\$75.00
5/20/2019	1.1		Review new medical records obtained by client (.4); email Mr. Dilg re: setting additional call to discuss case schedule (.2); prepare supplemental discovery responses based on additional medical records (.3); draft letter to enclose supplemental production and transmit to Mr. Renn & Ms. Brown for review (.2).	\$375.00	\$412.50
5/20/2019	0.5		Begin drafting factual section for MSJ describing treatment of gender dysphoria.	\$375.00	\$187.50
5/21/2019	0.7		Continue drafting factual section for MSJ describing treatment of gender dysphoria.	\$375.00	\$262.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
5/21/2019	0.2		Transmit supplemental discovery responses draft to Mr. Croft (.1); transmit the same to Ms. Fletcher (.1).	\$375.00	\$75.00
5/22/2019	0.2		Email co-counsel (.1) and defense counsel (.1) re: scheduling meet and confer to discuss case schedule.	\$375.00	\$75.00
5/22/2019	0.2		Email Dr. Ettner (.1) and Dr. Schechter (.1) re: availability to prepare MSJ declarations.	\$375.00	\$75.00
5/23/2019	0.3		Finalize and serve supplemental discovery responses and doc production.	\$375.00	\$112.50
5/24/2019	0.4		Proofread Dr. Schechter report for purposes of MSJ motion (.3); transmit Dr. Schechter expert dec. for MSJ to co-counsel for review (.1).	\$375.00	\$150.00
5/24/2019	0.2		Prepare for meet and confer with defendant.	\$375.00	\$75.00
5/24/2019	0.8		Meet and confer with defendant re: status of case schedule, and proposed MSJ schedule (.4); discuss same with Mr. Renn (.1); email summary of call and next steps to Mr. Croft (.2); email update to client (.1).	\$375.00	\$300.00
5/26/2019	0.4		Proofread Dr. Ettner declaration for MSJ motion.	\$375.00	\$150.00
5/30/2019	0.4		Edit/revise joint motion seeking amendment to case schedule based on input from Mr. Dilg (.3); implement further revisions from Mr. Renn (.1).	\$375.00	\$150.00
5/30/2019	0.4		Review court's amended ECF filing procedures guide and finalize filing of joint motion and proposed order seeking amendment to case schedule (.3); send update re: same to client (.1).	\$375.00	\$150.00
5/31/2020	0.1		Teleconference with Mr. Renn re: edit to motion re: summary judgment schedule.	\$375.00	\$37.50
6/3/2019	0.1		Implement Mr. Renn's edits to Dr. Ettner and Dr. Schechter MSJ declarations; email co-counsel re: same.	\$375.00	\$37.50
6/4/2019	0.2		Transmit expert declarations to Dr. Ettner (.1) and Dr. Schechter (.1) for review and signature.	\$375.00	\$75.00
6/4/2019	0.1		Update client re: court's order setting MSJ schedule.	\$375.00	\$37.50
6/4/2019	3.7		Review sex discrimination briefing from other similar cases, including <i>Flack, Toomey, Roberts, and Boyden</i> for MSJ.	\$375.00	\$1,387.50
6/5/2019	4.3		Begin drafting section of MSJ re: why the exclusion discriminates based on sex (3.5); read/review <i>Schwenk</i> decision (0.8).	\$375.00	\$1,612.50
6/7/2019	0.2		Implement edits from Dr. Ettner to her MSJ declaration.	\$375.00	\$75.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
6/9/2019	0.1		Review email correspondence from Dr. Schechter about his MSJ declaration and transmit response.	\$375.00	\$37.50
6/12/2019	4.2		Draft undisputed facts section of MSJ re: Def's health plan and the exclusion (2); review Def's answer and discovery responses (2.2).	\$375.00	\$1,575.00
6/13/2019	1.8		Draft undisputed facts section of MSJ re: client's employment with the state (.9), and review supporting documents from client's document production (.9).	\$375.00	\$675.00
6/17/2019	0.1		Review Def.'s supplemental responses to Pltf.'s interrogatories and RFAs.	\$375.00	\$37.50
6/19/2019	3.6		Continue drafting section of MSJ re: sex discrimination theories.	\$375.00	\$1,350.00
6/20/2019	3.3		Continue drafting section of MSJ re: why the exclusion discriminates based on sex.	\$375.00	\$1,237.50
6/21/2019	1.4		Edit/revise draft MSJ and transmit to Mr. Renn and Ms. Brown for review.	\$375.00	\$525.00
6/22/2019	0.2		Finalize Dr. Ettner declaration ISO motion for summary judgment for signature.	\$375.00	\$75.00
6/22/2019	0.3		Finalize Dr. Schechter declaration ISO motion for summary judgment for signature.	\$375.00	\$112.50
6/23/2019	0.4		Insert record cites in MSJ to Dr. Ettner and Dr. Schechter declarations.	\$375.00	\$150.00
6/25/2019	0.6		Implement edits to MSJ from Mr. Renn.	\$375.00	\$225.00
6/25/2019	0.7		Draft/prepare Ms. Fletcher's declaration ISO MSJ.	\$375.00	\$262.50
6/25/2019	0.4		Telephone calls with Mr. Renn and Mr. Croft re: Title VII development and implications for MSJ, and finalizing MSJ.	\$375.00	\$150.00
6/26/2019	0.5		Implement edits to motion for summary judgment from Litigation Director, Ms. Flynn.	\$375.00	\$187.50
6/26/2019	0.5		Teleconference with Mr. Renn re: draft MSJ and related strategy.	\$375.00	\$187.50
6/27/2019	0.2		Review client's edits to her declaration ISO MSJ (.1); email co-counsel re: same (.1).	\$375.00	\$75.00
6/27/2019	0.1		Transmit client's declaration to her for signature.	\$375.00	\$37.50
6/27/2019	0.3		Insert record cites in MSJ to client's declaration.	\$375.00	\$112.50
6/27/2019	0.8		Insert record cites in MSJ to attorney declaration.	\$375.00	\$300.00
6/28/2019	0.1		Prepare cover letter for chambers copy of MSJ.	\$375.00	\$37.50
6/29/2019	0.9		Proofread MSJ.	\$375.00	\$337.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
7/1/2019	0.2		Teleconference with Mr. Renn re: finalizing MSJ.	\$375.00	\$75.00
7/30/2019	0.2		Review Mr. Dilg's request for briefing schedule adjustment and respond.	\$375.00	\$75.00
8/1/2019	0.1		Review Mr. Dilg's draft extension motion and respond.	\$375.00	\$37.50
8/17/2019	0.3		Begin reviewing Def's summary judgment filing, and draft email to Mr. Milks re: Def's disclosure of confidential information in its filing.	\$375.00	\$112.50
9/1/2019	2.4		Review and annotate Def's summary judgment filing; begin outlining responsive brief.	\$375.00	\$900.00
9/2/2019	1.2		Draft MSJ opposition & reply brief section re: why the exclusion is not neutral even though it affects trans men and women.	\$375.00	\$450.00
9/4/2019	3.5		Continue drafting section regarding why the exclusion is not neutral even though it affects trans men and women.	\$375.00	\$1,312.50
9/5/2019	3.4		Draft MSJ opposition & reply brief section re: why the exclusion is impermissible sex stereotyping.	\$375.00	\$1,275.00
9/6/2019	2.1		Continue drafting section regarding why the exclusion is impermissible sex stereotyping.	\$375.00	\$787.50
9/7/2019	5.3		Draft MSJ opposition & reply brief section re: Def's attempt to recast the exclusion as non-discriminatory and Ms. Fletcher's claim as seeking "preferential treatment."	\$375.00	\$1,987.50
9/8/2019	5.2		Draft MSJ opposition & reply brief introduction; and research and respond to Def's cases involving healthcare restrictions on infertility, and sex-differentiated grooming standards.	\$375.00	\$1,950.00
9/9/2019	2.8		Draft MSJ opposition & reply brief section re: various ways in which Def. mischaracterizes plaintiff's arguments.	\$375.00	\$1,050.00
9/10/2019	0.7		Edit/revise draft MSJ opposition & reply brief for length.	\$375.00	\$262.50
9/11/2019	1.4		Edit/revise draft MSJ opposition & reply brief for content and clarity (1.2); transmit draft to Lambda co-counsel (.1), and E. Croft (.1).	\$375.00	\$525.00
9/15/2019	0.5		Implement Mr. Renn's edits to MSJ opposition & reply brief.	\$375.00	\$187.50
9/15/2019	0.6		Implement edits from Litigation Director, Ms. Flynn, to MSJ opposition & reply brief.	\$375.00	\$225.00
9/16/2019	0.7		Proofread MSJ opposition & reply brief.	\$375.00	\$262.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
9/17/2019	0.6		Finalize MSJ opposition & reply brief for filing (.4), along with cover letter for chambers copy (.1); transmit copy of cover letter to opposing counsel (.1).	\$375.00	\$225.00
9/17/2019	0.1		Transmit copy of filed MSJ opposition & reply brief to client.	\$375.00	\$37.50
10/4/2019	0.1		Transmit copy of Def.'s filed MSJ brief to client.	\$375.00	\$37.50
10/7/2019	0.2		Read/review order from the court asking whether argument should proceed in light of <i>Harris Funeral Homes</i> at Supreme Court (.1); email client re: same (.1).	\$375.00	\$75.00
10/7/2019	0.2		Discuss with Mr. Renn strategy surrounding response to court order requiring parties' position on argument in light of <i>Harris Funeral Homes</i> .	\$375.00	\$75.00
10/8/2019	0.5		Draft part of response to court's order re: <i>Harris Funeral Homes</i> .	\$375.00	\$187.50
10/10/2019	0.1		Email co-counsel re: court order re: <i>Harris Funeral Homes</i> .	\$375.00	\$37.50
10/11/2019	0.1		Email opposing counsel re: court order re: <i>Harris Funeral Homes</i> .	\$375.00	\$37.50
10/16/2019	0.2		Analyze Mr. Renn's revisions to response to court's order re: <i>Harris Funeral Homes</i> .	\$375.00	\$75.00
12/13/2019	0.1		Send client status update.	\$375.00	\$37.50
12/23/2019	0.7		Read/review latest decision in <i>Toomey v. Arizona</i> (.3); draft prepare notice of supplemental authority (.3); email co-counsel re: same (.1).	\$375.00	\$262.50
12/23/2019	0.2		Review order re: scheduling oral argument, and notify client re: same.	\$375.00	\$75.00
12/24/2019	0.2		Proofread and file notice of supp. authority re: <i>Toomey v. Arizona</i> .	\$375.00	\$75.00
12/24/2019	0.1		Confer with Mr. Croft re: scheduling of oral argument.	\$375.00	\$37.50
12/24/2019	0.2		Confer with Mr. Milks re: potential oral argument dates per court order.	\$375.00	\$75.00
12/24/2019	0.4		Oral argument prep: review and annotate def's MSJ reply brief.	\$375.00	\$150.00
12/25/2019	0.8		Oral argument prep: continue to review and annotate def's MSJ brief.	\$375.00	\$300.00
12/26/2019	0.9		Oral argument prep: review and annotate pltf's MSJ brief.	\$375.00	\$337.50
12/28/2019	0.2	No charge	Begin drafting response to ct. order at ECF 50 re: setting dates for argument.	\$375.00	\$0.00
12/29/2019	3.6		Oral argument prep: review key appellate cases cited by plaintiff (e.g., <i>Schwenk</i> , <i>Oncala</i> , <i>Manhart</i> , <i>Gilbert</i> , <i>Ariz. Governing Comm.</i> , and others).	\$375.00	\$1,350.00
12/30/2019	0.5		Teleconference with Mr. Milks re: submission to court re: oral argument (.2); email client re: same (.2); edit/revise draft submission for court re: oral argument (.1).	\$375.00	\$187.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
1/2/2020	0.2		Read order from court re: scheduling argument, and email co-counsel re: same (.1); update client re: same (.1).	\$375.00	\$75.00
1/4/2020	0.1		Email Mr. Dilg re: proposed dates for oral argument.	\$375.00	\$37.50
1/6/2020	0.1		Edit/revise Mr. Dilg's draft response to the court re: dates for oral argument.	\$375.00	\$37.50
1/10/2020	2.4		Oral argument prep: review key cases cited by defendant (e.g., <i>Baker, Saks</i> , and others).	\$375.00	\$900.00
1/11/2020	4.1		Oral argument prep: draft Q & A to summarize pltf's responses to def's key MSJ arguments.	\$375.00	\$1,537.50
1/12/2020	1.9		Oral argument prep: review district court decisions cited in pltf's briefing.	\$375.00	\$712.50
1/13/2020	3.7		Oral argument prep: draft opening comments for hearing (1.7); review argument preparation notes (2).	\$375.00	\$1,387.50
2/14/2020	1.7		Moot oral argument to prepare for summary judgment hearing.	\$375.00	\$637.50
2/17/2020	12.7		Travel from Atlanta to Anchorage for MSJ hearing.	\$375.00	\$4,762.50
2/18/2020	5.9		Oral argument prep: Review notes of case summaries, factual record, and prepared comments for MSJ hearing.	\$375.00	\$2,212.50
2/19/2020	0.8		Participate in hearing on cross-MSJs.	\$375.00	\$300.00
2/19/2020	3.4		Travel from Anchorage to Seattle on return trip from MSJ hearing.	\$375.00	\$1,275.00
2/20/2020	0.1		Prepare transcript request form.	\$375.00	\$37.50
2/23/2020	9.1		Travel from Seattle to Atlanta on return trip from MSJ hearing.	\$375.00	\$3,412.50
3/6/2020	0.5		Read/review court's ruling on cross-MSJs (.3); call with client re: ruling and potential next steps (.2).	\$375.00	\$187.50
3/9/2020	0.2		Email co-counsel re: strategy surrounding conferring with defendant about revised case schedule (.1); email client re: same (.1).	\$375.00	\$75.00
3/15/2020	0.4		Research re: options for securing final judgment under current case posture.	\$375.00	\$150.00
3/20/2020	0.2		Email co-counsel, opposing counsel, and client about state's request for extension of time to propose amended case schedule.	\$375.00	\$75.00
3/21/2020	0.1		Email client re: state's request for extension to re-set case schedule.	\$375.00	\$37.50
3/21/2020	0.1		Review state's motion for extension to re-set case schedule.	\$375.00	\$37.50
4/1/2020	1.5		Telephone conference with Ms. Fletcher, Mr. Renn, and Mr. Croft re: terms of settlement demand (1.2); discuss strategy re: same with Mr. Renn and Mr. Charles (Lambda Legal attorney) (.3).	\$375.00	\$562.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
4/2/2020	0.2		Prepare for 4/3 teleconference with Attorney General's office.	\$375.00	\$75.00
4/3/2020	0.8		Teleconference with Mr. Dilg and Mr. Renn re: re-setting case schedule, and possible resolution of remaining claims in the case (.4); debrief same with Mr. Renn and Mr. Charles (Lambda Legal attorney) (.4).	\$375.00	\$300.00
4/3/2020	0.2		Send analysis of conference with Mr. Dilg to legal team and client.	\$375.00	\$75.00
4/4/2020	0.2		Send additional analysis re: possible resolution of remaining claims in response to client's questions.	\$375.00	\$75.00
4/6/2020	0.4		Teleconference with Mr. Renn to discuss strategy for settlement letter to Defendant.	\$375.00	\$150.00
4/7/2020	0.2		Teleconference with Mr. Renn re: settlement letter.	\$375.00	\$75.00
4/8/2020	0.6		Teleconference with Mr. Renn and Ms. Fletcher re: settlement letter (.5); call with Mr. Renn re: same (.1).	\$375.00	\$225.00
4/9/2020	0.1		Finalize settlement demand and transmit to Mr. Dilg.	\$375.00	\$37.50
4/10/2020	0.4		Edit/revise Mr. Dilg's draft status report for filing on 4/13, and transmit to Mr. Renn and Mr. Croft for review.	\$375.00	\$150.00
4/10/2020	0.1		Update client re: today's correspondence from Mr. Dilg.	\$375.00	\$37.50
4/13/2020	0.2		Email correspondence with Mr. Renn re: strategy surrounding Mr. Dilg's draft status report and ongoing settlement discussions.	\$375.00	\$75.00
4/15/2020	0.1		Review and respond to Mr. Dilg's request for additional time to consider settlement offer.	\$375.00	\$37.50
4/17/2020	0.3		Review State's response to plaintiff's settlement demand (.2); transmit the same to client (.1).	\$375.00	\$112.50
4/17/2020	0.3		Teleconference with Mr. Renn and Mr. Croft re: state's response to plaintiff's settlement demand.	\$375.00	\$112.50
4/18/2020	1.1		Legal research re: contentions made in Def's settlement letter (.4); draft response to State's April 17, 2020 settlement letter (.7).	\$375.00	\$412.50
4/19/2020	0.3		Edit/revise draft response to Mr. Dilg's settlement letter.	\$375.00	\$112.50
4/20/2020	0.1		Email Mr. Renn analysis re: draft response to Mr. Dilg's settlement letter.	\$375.00	\$37.50
4/20/2020	0.6		Teleconference with Mr. Renn re: strategy surrounding arguments in response to Mr. Dilg's settlement letter, and related research.	\$375.00	\$225.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
4/20/2020	0.3		Review and implement Mr. Renn's edits to response to Mr. Dilg's settlement letter (.2); transmit the same to client and co-counsel (.1).	\$375.00	\$112.50
4/21/2020	0.2		Respond to client comments re: draft settlement letter response, and revise letter.	\$375.00	\$75.00
4/21/2020	0.1		Review Mr. Renn's further edits to settlement response.	\$375.00	\$37.50
4/21/2020	0.1		Finalize settlement response and transmit to Mr. Dilg.	\$375.00	\$37.50
4/22/2020	0.2		Review court order re: new deadline for case schedule, and confer with Mr. Renn re: same.	\$375.00	\$75.00
4/27/2020	0.1		Prepare email to Mr. Dilg inquiring about overdue response to settlement letter.	\$375.00	\$37.50
4/28/2020	0.1		Respond to email from Mr. Dilg re: settlement discussions, and transmit to client.	\$375.00	\$37.50
5/1/2020	0.2		Review Mr. Dilg's letter re: settlement dated 5/1/2020 (.1); transmit same to client (.1).	\$375.00	\$75.00
5/2/2020	0.4		Teleconference with Mr. Renn re: strategy surrounding response to State's settlement counter-offer.	\$375.00	\$150.00
5/2/2020	0.1		Confer with Mr. Croft re: strategy surrounding response to State's settlement counter-offer.	\$375.00	\$37.50
5/2/2020	0.2		Draft response to Mr. Dilg's 5/1/2020 settlement letter.	\$375.00	\$75.00
5/3/2020	0.6		Teleconference with Ms. Fletcher re: response to Mr. Dilg's 5/1/2020 settlement letter (.4); call with Mr. Renn re: next steps (.2).	\$375.00	\$225.00
5/5/2020	0.3		Edit/revise Mr. Renn's draft response to Mr. Dilg's 5/1/2020 settlement letter (.2); transmit same to client and co-counsel (.1).	\$375.00	\$112.50
5/5/2020	0.3		Correspond with client and legal team re: approval to send letter (.2); finalize letter to Mr. Dilg and transmit (.1).	\$375.00	\$112.50
5/9/2020	0.6		Call with client re: State's latest settlement offer (.3); confer with Mr. Renn re: strategy for responsive approach to Mr. Dilg (.2); memorialize strategic decisions in email to Mr. Renn (.1).	\$375.00	\$225.00
5/11/2020	0.1		Correspond with Mr. Dilg re: additional call to discuss settlement.	\$375.00	\$37.50
5/11/2020	0.1		Call with Mr. Dilg re: settlement terms; update client re: same.	\$375.00	\$37.50
5/12/2020	0.1		Call with Mr. Dilg re: state's settlement offer, and update client re: same.	\$375.00	\$37.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
5/12/2020	0.1		Confer with client re: State's latest settlement offer.	\$375.00	\$37.50
5/13/2020	0.2		Draft email to Mr. Dilg re: acceptance of settlement offer (.1); transmit same to Mr. Renn with analysis (.1).	\$375.00	\$75.00
5/15/2020	0.8		Draft/prepare motion for entry of judgment, and judgment.	\$375.00	\$300.00
5/16/2020	0.3		Edit/revise motion for entry of judgment, and judgment, and transmit to Mr. Renn for review.	\$375.00	\$112.50
5/19/2020	0.4		Teleconference with Mr. Renn re: form of judgment and interest calculations.	\$375.00	\$150.00
5/20/2020	0.4		Implement Mr. Renn's edits to motion and judgment, and annotate additional proposed revisions.	\$375.00	\$150.00
5/20/2020	0.2		Proofread motion and judgment, and transmit to Mr. Croft for review.	\$375.00	\$75.00
5/20/2020	0.1		Analyze Mr. Croft's edits to draft motion and email Mr. Renn re: same.	\$375.00	\$37.50
5/20/2020	0.2		Respond to Mr. Croft (.1); finalize documents and transmit to Mr. Dilg (.2).	\$375.00	\$75.00
5/28/2020	0.1		Email Mr. Dilg about status of defendant's review of proposed judgment.	\$375.00	\$37.50
5/29/2020	0.6		Review Mr. Dilg's edits to proposed judgment, and prepare counter-proposal.	\$375.00	\$225.00
5/29/2020	0.4		Teleconference with Mr. Renn re: Mr. Dilg's edits to proposed judgment.	\$375.00	\$150.00
5/29/2020	0.6		Implement Mr. Croft and Mr. Renn's edits to proposed judgment.	\$375.00	\$225.00
6/4/2020	0.6		Review defendant's edits to stipulated judgment (.2); send analysis to Mr. Renn (.2); email Mr. Croft re: same (.1); transmit response to Mr. Dilg (.1).	\$375.00	\$225.00
6/5/2020	0.2		Call with Mr. Renn re: Mr. Dilg's response to plaintiff's edits to stipulated judgment.	\$375.00	\$75.00
6/5/2020	0.6		Draft/prepare written response to Mr. Dilg re: finalizing stipulated judgment (.3), and finalize stipulated judgment and motion for filing (.3).	\$375.00	\$225.00
7/15/2020	0.1		Update client re: expiration of Defendant's deadline to notice an appeal.	\$375.00	\$37.50
7/31/2020	0.2		Teleconference with Mr. Renn re: testimony to support local hourly rates in fees motion.	\$375.00	\$75.00
8/17/2020	0.5		Teleconference with Mr. Renn re: strategy surrounding fees and costs motion, and division of work.	\$375.00	\$187.50
8/17/2020	0.1		Email Mr. Croft re: declaration supporting fee application from Ms. Orlansky.	\$375.00	\$37.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
8/17/2020	0.4		Draft/prepare declaration for Ms. Orlansky supporting plaintiff's fee request.	\$375.00	\$150.00
8/18/2020	0.1		Email Ms. Orlansky re: declaration supporting fee application.	\$375.00	\$37.50
8/22/2020	0.8		Continue drafting declaration for Ms. Orlansky supporting plaintiff's fee request.	\$375.00	\$300.00
8/23/2020	0.5		Review time sheet entries above for privilege and billing judgment, for plaintiff's fee request.	\$375.00	\$187.50
8/23/2020	0.7		Draft/prepare declaration for Mr. Dudukgian supporting plaintiff's fee request.	\$375.00	\$262.50
TOTAL	243.7			TOTAL	\$91,387.50

EXHIBIT C

Plaintiff's Costs

Post date for invoice or credit card charge	Vendor name/type	Description	Actual Cost
5/31/2018	Federal Express	Postage fee	\$41.78
6/20/2018	Federal Express	Postage fee	\$65.28
6/30/2018	American Express	Court Fees – pro hac vice for Borelli	\$150.00
6/30/2018	American Express	Court Fees – pro hac vice for Renn	\$150.00
6/30/2018	American Express	State Bar of GA Certificate of Good Standing for Ms. Borelli, for pro hac vice application	\$15.00
8/14/2018	AMS Couriers	Courier fee to pick up summons from court	\$33.45
9/26/2018	Federal Express	Postage fee	\$19.14
10/30/2018	Federal Express	Postage fee	\$49.36
11/7/2018	Civil Claims Service	Process server for medical records subpoena served on Aetna	\$78.75
11/20/2018	Federal Express	Postage fee	\$23.48
11/20/2018	Federal Express	Postage fee	\$40.52
11/21/2018	American Express	Alaska Airlines – flight for plaintiff to Chicago for meeting with expert, Dr. Ettner	\$751.87
12/19/2018	Dr. Randi Ettner	Expert fee for review of medical records, consultation, client interview, interpretation of tests	\$3,388.75
12/31/2018	Lodging	Hotel for plaintiff to meet with Dr. Ettner	\$262.98
12/31/2018	Meal	Meal for plaintiff during travel to meet with Dr. Ettner	\$17.15
12/31/2018	Meal	Meal for plaintiff during travel to meet with Dr. Ettner	\$11.94
12/31/2018	Meal	Meal for plaintiff during travel to meet with Dr. Ettner	\$13.94

Post date for invoice or credit card charge	Vendor name/type	Description	Actual Cost
12/31/2018	Meal	Meal for plaintiff during travel to meet with Dr. Ettner	\$5.50
12/31/2018	Meal	Meal for plaintiff during travel to meet with Dr. Ettner	\$8.42
12/31/2018	Uber	Transportation for plaintiff to meet with Dr. Ettner	\$64.72
1/30/2019	State of New York	Certificate of Good Standing for Ms. Brown	\$10.00
2/1/2019	Dr. Loren S. Schechter	Expert fee for reviewing declarations	\$1,125
2/5/2019	Federal Express	Postage fee	\$18.62
2/11/2019	Dr. Randi Ettner	Expert fee for consultation and review of documents	\$2,718.75
2/13/2019	Federal Express	Postage fee	\$24.21
5/31/2019	Federal Express	Postage fee	\$37.58
6/3/2019	Federal Express	Postage fee	\$39.95
6/30/2019	Dr. Randi Ettner	Expert fee for review of summary judgment declaration	\$187.50
7/31/2019	Federal Express	Postage fee	\$25.35
9/30/2019	Federal Express	Postage fee	\$33.76
1/15/2020	American Express	American Airlines – Ms. Borelli’s flight to Anchorage for oral argument	\$367.29
2/19/2020	Meal	Meal for Mr. Renn during travel to oral argument	\$8.79
2/19/2020	Lodging	Hotel for Mr. Renn to attend argument on summary judgment hearing	\$163.52
2/19/2020	Uber	Transportation for Mr. Renn in connection with travel for summary judgment hearing	\$31.02
2/19/2020	Meal	Meal for Mr. Renn during travel for oral argument	\$9.00

Post date for invoice or credit card charge	Vendor name/type	Description	Actual Cost
2/19/2020	Uber	Transportation for Mr. Renn in connection with travel for summary judgment hearing	\$18.04
2/19/2020	Uber	Transportation for Mr. Renn in connection with travel for summary judgment hearing	\$19.25
2/19/2020	Travel	Delta Airlines – Mr. Renn’s air travel for summary judgment hearing	\$442.90
2/19/2020	Lyft	Transportation for Mr. Renn in connection with travel for summary judgment hearing	\$21.70
2/19/2020	American Express	Meal for Mr. Renn during travel for oral argument	\$9.00
2/19/2020	American Express	Meal for Mr. Renn during travel for oral argument	\$13.00
TOTAL			\$10,516.26