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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 PETER C. RENN IN SUPPORT OF PLAINTIFF'S
MOTION FOR ATTORNEY'S FEES AND EXPENSES**

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

I, Peter C. Renn, 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.

3. I graduated *magna cum laude* from Harvard Law School in 2006, where I was an executive editor of the Harvard Civil Rights-Civil Liberties Law Review. After law school, I clerked for the Honorable Lawrence Karlton in the United States District Court for the Eastern District of California. I have worked full-time on civil rights cases for the LGBT community at Lambda Legal since 2010. I work in Lambda Legal’s Western Regional Office, which is based in Los Angeles, California. I am a recipient of the National LGBT Bar Association’s Best LGBT Lawyers Under 40 Award. Attached as Exhibit A is a true and correct copy of my resume.

4. I am admitted to the State Bar of California; the Central, Eastern, and Northern Districts of California; the Fourth, Fifth, Ninth, D.C., and Federal Circuits; and the United States Supreme Court.

5. Before joining Lambda Legal, I practiced at the law firm of Munger, Tolles & Olson in Los Angeles, California, where one of my practice areas was employment. At the time I left the law firm in 2010, my billing rate was more than \$400 per hour.

6. During my time at Lambda Legal, I have acquired specialized experience

and knowledge litigating cases involving discrimination against transgender people, including the denial of access to gender-confirming care. I heavily relied upon that experience and knowledge for my representation of Ms. Fletcher, because the key issue in this case was whether the denial of such care constitutes unlawful sex discrimination under Title VII of the Civil Rights Act of 1964. Representative examples of the cases that I have litigated include the following: *Karnoski v. Trump*, 926 F.3d 1180 (9th Cir. 2019) (counsel in challenge to ban on open military service by transgender people); *Rosati v. Igbinoso*, 791 F.3d 1037 (9th Cir. 2015) (counsel on appeal for transgender prisoner denied access to gender-confirming surgical care); *F.V. v. Barron*, 286 F. Supp. 3d 1131 (D. Idaho 2018) (counsel in challenge to denial of birth certificates reflecting gender identity); *Roberts v. Clark Cnty. Sch. Dist.*, 215 F. Supp. 3d 1001 (D. Nev. 2016) (*amicus* counsel in denial of restroom access for transgender employee under Title VII); *Carcaño v. McCrory*, 203 F. Supp. 3d 615 (M.D.N.C. 2016) (counsel in challenge to North Carolina laws discriminating against transgender people in access to public facilities). I have also worked with several experts regarding the health care needs of transgender people in these cases, and that subject matter knowledge was critical to the effective representation of Ms. Fletcher.

7. I have also successfully litigated on behalf of LGBT people in Alaska in the past. I co-counseled with Eric Croft to represent the surviving same-sex partner of an employee who was killed at work, and we obtained a ruling from the Alaska Supreme Court that the denial of spousal survivor's benefits to same-sex couples, who were

barred from marriage at the time, violated equal protection guarantees under the state constitution. *Harris v. Millennium Hotel*, 330 P.3d 330 (Alaska 2014).

8. I am seeking fees for 169.4 hours of work on this case at a rate of \$325 per hour. 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.

9. I supervised another Lambda Legal attorney who contributed to research for and drafting of the summary judgment briefing concerning the relevance of legislative history as applied to this case. Plaintiff has not sought fees for that attorney's time.

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

11. 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/ Peter C. Renn

Peter C. Renn

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

EDUCATION

Harvard Law School, June 2006

Honors: *magna cum laude*, top 10%
Activities: *Civil Rights-Civil Liberties Law Review*, Executive Editor
Lambda, Co-President
Asian Pacific American Law Students Association, Member

University of Texas at Austin, B.A. in Psychology & Plan II, May 2003

Honors: *summa cum laude*
Distinguished Dedman Scholar, Four-Year Merit Scholarship

EXPERIENCE

Lambda Legal Defense and Education Fund, Inc.

Jun. 2010 – Present Counsel Los Angeles, CA

Responsible for impact test-case litigation advancing the civil rights of lesbian, gay, bisexual, and transgender (LGBT) people and everyone living with HIV. Extensive litigation experience in courts throughout the western region of U.S., including briefing and argument to state and federal appeals courts. Oversee all aspects of litigation, including drafting of briefs, fact investigation, discovery, depositions, expert reports, trial preparation, and appeals. Identify potential new matters and devise case strategy from inception through appeal. Communicate with media regarding cases, which have been profiled in the *New York Times*, *Los Angeles Times*, and *Washington Post*. Speak at community events, conferences, and fundraising events. Recipient of the National LGBT Bar Association's Best LGBT Lawyers Under 40 Award.

Selected examples:

- *Ely v. Saul*, 2020 WL 2744138 (D. Ariz. Jul. 24, 2020): Counsel in challenge to denial of social security survivor's benefits to same-sex couples barred from marriage for requisite duration by unconstitutional state marriage laws. Obtained class certification and nationwide injunction.
- *Gender and Sexuality Alliance v. Spearman*, 2020 WL 1227345 (D.S.C. Mar. 11, 2020): Counsel in challenge to anti-gay school curriculum law. Obtained consent decree enjoining enforcement.
- *Karnoski v. Trump*, 926 F.3d 1180 (9th Cir. 2019): Counsel in pending challenge to federal policy excluding transgender people from military service. Obtained appellate ruling holding that discrimination against transgender people requires heightened constitutional scrutiny.
- *Cervelli v. Aloha Bed & Breakfast*, 415 P.3d 919 (Haw. Ct. App. 2018), *cert. denied*, 139 S. Ct. 1319 (2019): Counsel for same-sex couple denied access to business based on owner's religious beliefs. Obtained ruling that free exercise of religion does not justify discrimination.
- *L.C. v. M.G.*, 430 P.3d 400 (Haw. 2018), *cert. denied*, 140 S. Ct. 234 (2019): Counsel on appeal in case holding that marital presumption of parentage applies equally to same-sex spouses.
- *F.V. v. Barron*, 286 F. Supp. 3d 1131 (D. Idaho 2018): Counsel in case holding that denial of birth certificates to transgender people matching their gender identity is unconstitutional.

EXHIBIT B

Fletcher v. State of Alaska
Time Sheet for Counsel Peter Renn

Date	Time	Billing Judgment	Description	Hourly Rate	Total
5/26/2017	2.5		Telephone conference with Ms. Fletcher to gather facts.	\$325	\$812.50
4/9/2018	.7		Telephone conferences with Ms. Borelli regarding telephone conference with Ms. Fletcher and tasks to prepare for EEOC proceedings.	\$325	\$227.50
4/9/2018	.6		Telephone conference with Ms. Fletcher and Ms. Borelli re: potential representation before EEOC.	\$325	\$195.00
4/11/2018	0.8		Telephone conference with Ms. Borelli regarding mental health records and potential expert discovery issues.	\$325	\$260.00
4/18/2018	0.5		Telephone conference with Ms. Borelli, Mr. Nevins, and Mr. Levasseur (other Lambda Legal attorneys) to consult re: potential representation of Ms. Fletcher.	\$325	\$162.50
4/20/2018	0.3		Email Ms. Fletcher re: proposed counter-offer to State.	\$325	\$97.50
4/20/2018	0.2		Telephone conference with Ms. Borelli regarding EEOC developments.	\$325	\$65.00
4/20/2018	0.7		Analyze facts and documents collected to date from Ms. Fletcher.	\$325	\$227.50
4/23/2018	0.2	No charge	Telephone conference with Ms. Borelli re: potential state law claims.	\$325	\$0.00
4/23/2018	2.3		Analyze facts and documents collected to date from Ms. Fletcher and draft email to consult with Ms. Taylor re: same.	\$325	\$747.50
4/23/2018	0.5	No charge	Telephone conference with Ms. Borelli re: potential Affordable Care Act claim.	\$325	\$0.00
4/25/2018	1.3		Telephone conference with Mr. Croft and Ms. Borelli re: legal theories for potential claims and potential venues.	\$325	\$422.50
4/30/2018	0.2		Research patient's right to access psychotherapy notes.	\$325	\$65.00
5/3/2018	0.3		Email Ms. Borelli re: retainer and co-counsel agreements, right to sue notice, and preliminary litigation tasks.	\$325	\$97.50
5/3/2018	0.5		Telephone conference with Ms. Borelli and Ms. Brown to discuss procedural posture and research re: medical records.	\$325	\$162.50
5/4/2018	0.2	No charge	Telephone conference with Ms. Borelli regarding potential Affordable Care Act claim.	\$325	\$0.00
5/14/2018	0.3		Telephone conference with Ms. Borelli and Ms. Fletcher re: EEOC right to sue notice and other procedural issues.	\$325	\$97.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
5/14/2018	0.5		Analyze EEOC charges and email Ms. Fletcher re: right to sue notice.	\$325	\$162.50
5/16/2018	3.2		Review exemplar complaints challenging exclusions on transition-related care; draft plaintiff's complaint.	\$325	\$1,040.00
5/17/2018	2.1		Draft plaintiff's complaint.	\$325	\$682.50
5/18/2018	1.2		Draft plaintiff's complaint.	\$325	\$390.00
5/18/2018	0.1		Telephone conference with Ms. Borelli re: requesting EEOC charge file.	\$325	\$32.50
5/21/2018	3.1		Draft plaintiff's complaint.	\$325	\$1,007.50
5/22/2018	6.5		Draft plaintiff's complaint.	\$325	\$2,112.50
5/25/2018	0.4		Telephone conferences with Ms. Borelli re: complaint revisions and medical records.	\$325	\$130.00
5/25/2018	0.3		Email Mr. Upton re: complaint revisions.	\$325	\$97.50
5/25/2018	0.9		Telephone conference with Ms. Fletcher to gather additional facts for complaint and collect additional documents.	\$325	\$292.50
5/25/2018	0.3		Review and revise plaintiff's complaint.	\$325	\$97.50
5/25/2018	0.3		Email Mr. Croft and Ms. Fletcher re: draft complaint.	\$325	\$97.50
5/31/2018	0.5		Research regarding employer liability under Title VII for complaint.	\$325	\$162.50
6/1/2018	0.5		Email Mr. Croft re: plaintiff's complaint and revise same.	\$325	\$162.50
6/12/2018	0.5	No charge	Telephone conference with Ms. Borelli, Ms. Brown, and a potential plaintiff/witness ("Doe") regarding Doe's potential participation in case.	\$325	\$0.00
6/12/2018	0.1		Email Mr. Croft re: Doe's potential participation in case.	\$325	\$32.50
6/26/2018	0.3		Telephone conference with Mr. Milks regarding service and case status.	\$325	\$97.50
6/27/2018	0.5		Review federal and state rules regarding service of process and draft proof of same.	\$325	\$162.50
6/27/2018	0.2		Email Ms. Borelli regarding proof of service of process.	\$325	\$65.00
8/14/2018	0.4		Email Ms. Fletcher regarding defendant's answer and next steps in case.	\$325	\$130.00
8/30/2018	1.0		Prepare draft responses for 26(f) report and prepare for telephone conference with Ms. Borelli and Ms. Taylor re: same.	\$325	\$325.00
8/30/2018	1.4		Telephone conference with Ms. Borelli and Ms. Taylor re: 26(f) conference with opposing counsel.	\$325	\$455.00
8/31/2018	0.7		Telephone conference with Mr. Milks, Mr. Dilg, Ms. Borelli, and Ms. Brown to conduct 26(f) conference.	\$325	\$227.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
8/31/2018	0.2		Telephone conference with Ms. Borelli and Ms. Brown to debrief re: 26(f) conference.	\$325	\$65.00
8/31/2018	0.9		Revise draft 26(f) report in light of conference; email Mr. Croft re: same.	\$325	\$292.50
9/28/2018	1.2		Telephone conference with Ms. Borelli and Ms. Brown re: affirmative discovery and motion for summary judgment strategy issues.	\$325	\$390.00
10/4/2018	1.1		Telephone conference with Dr. Ettner and Ms. Borelli and Ms. Brown re: expert engagement.	\$325	\$357.50
10/16/2018	3.5		Review and revise plaintiff's discovery requests.	\$325	\$1,137.50
10/17/2018	0.1		Email Mr. Croft re: plaintiff's discovery requests.	\$325	\$32.50
10/17/2018	0.5		Review, finalize, and serve plaintiff's discovery requests.	\$325	\$162.50
10/26/2018	0.2		Telephone conference with Mr. Milks re: settlement offer.	\$325	\$65.00
10/26/2018	0.8		Email Mr. Croft and Ms. Fletcher re: settlement offer.	\$325	\$260.00
10/27/2018	0.9		Telephone conference with Ms. Fletcher, Ms. Borelli, and Mr. Croft.	\$325	\$292.50
10/27/2018	5.3		Research for settlement offer letter; analyze legal and factual issues regarding settlement offer letter; and draft settlement offer letter.	\$325	\$1,722.50
10/28/2018	2.6		Revise and finalize settlement offer letter.	\$325	\$845.00
10/29/2018	0.3		Prepare for settlement discussion with State.	\$325	\$97.50
10/29/2018	0.5		Telephone conference with Mr. Milks and Mr. Dilg re: settlement.	\$325	\$162.50
10/29/2018	0.2		Telephone conference with Ms. Borelli and Mr. Croft re: settlement.	\$325	\$65.00
10/29/2018	0.4		Email Ms. Fletcher re: settlement discussion.	\$325	\$130.00
11/19/2018	0.3		Telephone conference with Mr. Dilg regarding settlement offer.	\$325	\$97.50
11/19/2018	0.2		Email Ms. Fletcher and litigation team regarding settlement status.	\$325	\$65.00
11/21/2018	0.5		Telephone conference with Ms. Borelli and Dr. Ettner re: examination of Ms. Fletcher.	\$325	\$162.50
12/3/2018	1.0		Telephone conference with Dr. Ettner and Ms. Borelli and Ms. Brown regarding expert report.	\$325	\$325.00
12/3/2018	0.2		Telephone conference with Ms. Borelli re: Dr. Ettner's expert opinions.	\$325	\$65.00
12/4/2018	0.5		Telephone conference with Ms. Borelli re: Dr. Ettner's expert opinions.	\$325	\$162.50
12/13/2018	1.0		Telephone conference with Dr. Ettner and Ms. Borelli re: expert opinions.	\$325	\$325.00
1/18/2019	1.2		Telephone conference with Ms. Borelli regarding written discovery, experts, and motion for summary judgment preparation and planning.	\$325	\$390.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
1/31/2019	1.1		Telephone conference with Ms. Borelli and Ms. Brown re: division of discovery and summary judgment tasks.	\$325	\$357.50
2/4/2019	0.5		Review discovery deficiency letter and email Ms. Borelli re: same.	\$325	\$162.50
2/4/2019	0.3		Review Dr. Ettner report/declaration.	\$325	\$97.50
2/5/2019	0.9		Review and revise Dr. Schechter report/declaration.	\$325	\$292.50
2/6/2019	1.1		Draft outline for motion for summary judgment and analyze similar motions or same.	\$325	\$357.50
2/6/2019	1.0		Telephone conference with Ms. Borelli and Ms. Taylor re: revisions to Ettner and Schechter reports.	\$325	\$325.00
2/8/2019	0.7		Telephone conference with Dr. Schechter regarding revisions to expert report.	\$325	\$227.50
2/11/2019	0.6		Review and revise Dr. Schechter's expert report.	\$325	\$195.00
2/11/2019	0.3		Review and revise Dr. Ettner's expert report.	\$325	\$97.50
2/14/2019	0.7		Prepare for meet and confer with state regarding deficiency letter.	\$325	\$227.50
2/14/2019	0.3		Telephone conference with Ms. Borelli and Ms. Brown to prepare for meet and confer with state regarding deficiency letter.	\$325	\$97.50
2/14/2019	1.5		Telephone conference with Mr. Dilg, Ms. Borelli and Ms. Brown to meet and confer with state regarding deficiency letter.	\$325	\$487.50
2/14/2019	0.2		Telephone conference with Mr. Croft re: meet and confer with state regarding deficiency letter.	\$325	\$65.00
2/14/2019	0.2		Telephone conference with Ms. Borelli and Ms. Brown re: meet and confer with state regarding deficiency letter.	\$325	\$65.00
3/6/2019	0.5		Research for motion for summary judgment (review of briefing in cases challenging denial of transition-related care).	\$325	\$162.50
3/14/2019	0.4		Review final witness list and email Ms. Borelli re: same.	\$325	\$130.00
3/15/2019	1.1		Review briefing from analogous cases and draft outline for motion for summary judgment.	\$325	\$357.50
3/29/2019	0.7		Review and respond to email from Ms. Borelli regarding responses to defendants' discovery requests.	\$325	\$227.50
4/9/2019	0.8		Teleconference with Ms. Borelli & Ms. Brown to prepare for 4/11/19 meet and confer with Mr. Dilg, and to discuss status of written discovery.	\$325	\$260.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
4/11/2019	0.9		Telephone conference with Mr. Dilg, Ms. Borelli, Ms. Brown, and Mr. Croft re: discovery issues and case schedule; telephone conference with Ms. Borelli, Ms. Brown, and Mr. Croft re: same.	\$325	\$292.50
4/19/2019	0.5		Telephone conference with Ms. Borelli regarding discovery schedule	\$325	\$162.50
5/3/2019	2.0		Review plaintiff's draft discovery responses.	\$325	\$650.00
5/24/2019	0.5		Telephone conference with Mr. Dilg and Ms. Borelli to discuss scheduling and motion for summary judgment; telephone conference with Ms. Borelli to debrief re: same.	\$325	\$162.50
5/31/2019	0.1		Telephone conference with Ms. Borelli to discuss potential revision to motion regarding motion for summary judgment schedule.	\$325	\$32.50
5/31/2019	0.1		Analyze and email with litigation team re: potential revision to motion regarding motion for summary judgment schedule.	\$325	\$32.50
6/3/2019	1.3		Review and revise Dr. Ettner and Dr. Schechter's expert declarations for use in support of motion for summary judgment.	\$325	\$422.50
6/25/2019	0.4		Telephone conference with Ms. Borelli regarding related case law development on Title VII and potential effect on motion for summary judgment.	\$325	\$130.00
6/25/2019	3.0		Review and revise draft of motion for summary judgment.	\$325	\$975.00
6/26/2019	0.5		Telephone conferences with Ms. Borelli regarding legal arguments in motion for summary judgment.	\$325	\$162.50
6/26/2019	0.3		Review and revise declaration of Ms. Fletcher in support of motion for summary judgment.	\$325	\$97.50
7/1/2019	1.7		Review and revise final draft of motion for summary judgment.	\$325	\$552.50
7/1/2019	0.2		Telephone conference with Ms. Borelli re: revisions to motion for summary judgment.	\$325	\$65.00
9/2/2019	1.5		Review and analyze defendant's cross-motion for summary judgment.	\$325	\$487.50
9/6/2019	0.7		Analyze arguments to oppose defendant's cross-motion for summary judgment re: legislative history and email Ms. Huppert re: same.	\$325	\$227.50
10/7/2019	0.2		Office conference with Ms. Huppert regarding reply in support of summary judgment and opposition to cross-motion.	\$325	\$65.00
10/7/2019	0.2		Discuss with Ms. Borelli strategy surrounding response to court order requiring parties' position on argument in light of Harris Funeral Homes.	\$325	\$65.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
10/15/2019	1.8		Revise and draft response to court order regarding potential stay of motions for summary judgment; research for same.	\$325	\$585.00
10/16/2019	2.0		Revise and draft response to court order regarding potential stay of motions for summary judgment.	\$325	\$650.00
2/11/2020	1.0		Review and comment on draft remarks for hearing on motion for summary judgment and email Ms. Borelli re: same.	\$325	\$325.00
2/14/2020	1.7		Attend moot oral argument to prepare for summary judgment hearing.	\$325	\$552.50
2/18/2020	9.6		Travel from Los Angeles home to Anchorage hotel (LAX-SEA, SEA-ANC) for hearing on cross-motions for summary judgment.	\$325	\$3,120.00
2/19/2020	0.8		Attend hearing on cross-motions for summary judgment.	\$325	\$260.00
2/19/2020	10.5		Travel from Anchorage hotel to Los Angeles home (ANC-SEA, SEA-LAX) for hearing on cross-motions for summary judgment.	\$325	\$3,412.50
4/1/2020	1.2		Telephone conference with Ms. Fletcher, Ms. Borelli, and Mr. Croft re: potential settlement demand.	\$325	\$390.00
4/1/2020	0.3		Telephone conference with Ms. Borelli and Mr. Charles (Lambda Legal attorney) re: potential settlement demand	\$325	\$97.50
4/3/2020	0.4		Telephone conference with Ms. Borelli and Mr. Dilg re next steps and potential appeal.	\$325	\$130.00
4/3/2020	0.4		Telephone conference with Ms. Borelli and Mr. Charles (Lambda Legal attorney) re: conference call with Mr. Dilg.	\$325	\$130.00
4/6/2020	0.7		Revise settlement letter; email with Ms. Borelli re: same	\$325	\$227.50
4/6/2020	0.4		Telephone conference with Ms. Borelli re: settlement letter.	\$325	\$130.00
4/7/2020	0.2		Telephone conference with Ms. Borelli re: settlement letter.	\$325	\$65.00
4/8/2020	0.5		Telephone conference with Ms. Borelli and Ms. Fletcher to discuss settlement letter.	\$325	\$162.50
4/8/2020	0.1		Telephone conference with Ms. Borelli to discuss settlement letter.	\$325	\$32.50
4/8/2020	0.7		Revise settlement letter.	\$325	\$227.50
4/17/2020	0.2		Review state's response to settlement letter.	\$325	\$65.00
4/17/2020	0.3		Confer with Ms. Borelli and Mr. Croft re: state's response to settlement letter.	\$325	\$97.50
4/20/2020	0.2		Email Ms. Borelli re: draft response to state counter-offer.	\$325	\$65.00

Date	Time	Billing Judgment	Description	Hourly Rate	Total
4/20/2020	2.9		Review and revise draft response to state counteroffer; research re: waiver of Title VII rights.	\$325	\$942.50
4/20/2020	0.6		Telephone conference with Ms. Borelli re: draft response to state counteroffer.	\$325	\$195.00
4/21/2020	0.5		Revise settlement letter based on comments from Ms. Fletcher; email Ms. Borelli re: same.	\$325	\$162.50
5/1/2020	0.4		Review and analyze settlement letter from Mr. Dilg.	\$325	\$130.00
5/2/2020	0.4		Telephone conference with Ms. Borelli re: settlement letter from Mr. Dilg.	\$325	\$130.00
5/3/2020	0.4		Telephone conference with Ms. Borelli and Ms. Fletcher re: settlement negotiations.	\$325	\$130.00
5/3/2020	0.2		Telephone conference with Ms. Borelli re: settlement negotiations.	\$325	\$65.00
5/4/2020	0.3		Analyze recommendations and questions posed by Mr. Croft re: settlement negotiations.	\$325	\$97.50
5/4/2020	1.1		Draft settlement letter.	\$325	\$357.50
5/19/2020	0.4		Telephone conference with Ms. Borelli regarding proposed judgment and interest calculations.	\$325	\$130.00
5/19/2020	5.3		Review and revise joint motion for entry of judgment and proposed judgment; conduct research pre- and post-judgment interest and requirements for judgments.	\$325	\$1,722.50
5/29/2020	0.4		Telephone conference with Ms. Borelli re: revised judgment.	\$325	\$130.00
6/5/2020	0.5		Analyze email from Mr. Dilg regarding revised judgment and confer with Ms. Borelli re: same.	\$325	\$162.50
7/16/2020	0.3		Email with Ms. Fletcher, Ms. Borelli, and Mr. Croft re: absence of appeal.	\$325	\$97.50
7/31/2020	0.2		Telephone conference with Ms. Borelli re: declarations from practitioners regarding rates.	\$325	\$65.00
7/31/2020	0.2		Email Mr. Croft re: declarations from practitioners regarding rates.	\$325	\$65.00
8/14/2020	1.3		Research case law, applicable rules, and appropriate exemplars for attorneys' fees motion.	\$325	\$422.50
8/17/2020	0.2		Email Ms. Borelli regarding supporting declarations for attorneys' fees motion.	\$325	\$65.00
8/17/2020	0.5		Telephone conference with Ms. Borelli regarding supporting declarations for attorneys' fees motion and division of labor for same.	\$325	\$162.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
8/17/2020	1.5		Draft motion for attorneys' fees and conduct research for same.	\$325	\$487.50
8/18/2020	3.3		Draft motion for attorneys' fees and conduct research for same.	\$325	\$1,072.50
8/19/2020	3.3		Draft motion for attorneys' fees and conduct research for same.	\$325	\$1,072.50
8/20/2020	1.0		Draft motion for attorneys' fees.	\$325	\$325.00
8/20/2020	0.5		Review time entries for submission with fees motion.	\$325	\$162.50
8/21/2020	2.9		Draft motion for attorneys' fees.	\$325	\$942.50
8/23/2020	1.5		Draft motion for attorneys' fees.	\$325	\$487.50
8/23/2020	1.4		Review and revise draft declaration for Ms. Orlansky and email Ms. Borelli re: same.	\$325	\$455.00
8/24/2020	.7		Telephone conference with Ms. Borelli to coordinate re: declaration of Ms. Orlansky, time entries for motion, and preparing bill of costs and expenses.	\$325	\$227.50
8/24/2020	2.0		Draft declaration for Ms. Borelli in support of fees motion based on information provided by Ms. Borelli.	\$325	\$650.00
8/24/2020	.8	No charge	Review time entries for submission with fees motion.	\$325	\$0.00
8/24/2020	.9	No charge	Review and proofread time entries of Mr. Croft for submission with fees motion and email Ms. Borelli re: same.	\$325	\$0.00
8/24/2020	.3	No charge	Email Ms. Borelli regarding further revisions to Orlansky declaration.	\$325	\$0.00
8/25/2020	1.2		Review, revise, and comment on Dudukgian declaration; research regarding bases for fee enhancement for same; email Ms. Borelli re: same.	\$325	\$390.00
8/25/2020	.2		Email Mr. Croft regarding his declaration and time entries in support of fees motion.	\$325	\$65.00
8/25/2020	4.7		Draft motion for attorneys' fees.	\$325	\$1,527.50
8/25/2020	.1		Review bill of costs from Ms. Borelli.	\$325	\$32.50
8/25/2020	.3		Email Ms. Borelli regarding nontaxable expenses recoverable in motion.	\$325	\$97.50
8/25/2020	1.8		Draft Croft declaration in support of motion for attorney's fees based on information provided by Mr. Croft.	\$325	\$585.00
8/26/2020	.2		Review and comment on revised draft of Orlansky declaration and email Ms. Borelli re: same.	\$325	\$65.00
8/26/2020	.3		Review time entries to exercise billing judgment.	\$325	\$97.50
8/26/2020	3.7		Draft motion for attorney's fees.	\$325	\$1,202.50

Date	Time	Billing Judgment	Description	Hourly Rate	Total
8/26/2020	2.0		Draft declaration for Ms. Borelli in support of fees motion based on information provided by Ms. Borelli.	\$325	\$650.00
8/26/2020	.3	No charge	Review itemized nontaxable expenses and email Ms. Borelli re: same.	\$325	\$0.00
8/27/2020	1.2		Draft declaration of Peter Renn in support of motion for attorney's fees.	\$325	\$390.00
8/27/2020	.2		Draft proposed order for motion for attorney's fees.	\$325	\$65.00
8/27/2020	.3	No charge	Review, revise, and finalize motion for attorney's fees.	\$325	\$0.00
8/28/2020	2.1	No charge	Review, revise, and finalize motion for attorney's fees and supporting materials.	\$325	\$0.00
TOTAL	169.4			TOTAL	\$55,055.00