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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

F.V. and DANI MARTIN,

Plaintiffs,

vs.

DAVID JEPPESEN, in his official capacity as
Director of the Idaho Department of Health
and Welfare and ELKE SHAW-TULLOCH,
in her official capacity as Administrator of the
Division of Public Health the Idaho
Department of Health and Welfare, and
JAMES AYDELOTTE, in his official capacity
as State Registrar and Chief of the Bureau of
Vital Records and Health Statistics,

Defendants.

Case No. 1:17-cv-000170-CWD

**DEFENDANTS' OPPOSITION TO
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND EXPENSES
[DKT.83]**

Defendants, by and through their counsel of record, respond to Plaintiffs' Motion for Attorneys' Fees and Expenses (Dkt. 83) filed on September 29, 2021. The Court should reject Plaintiffs' request for close to a half million dollars in attorneys' fees under 42 U.S.C. § 1988 because it is excessive and unreasonable. For the reasons noted below, a reasonable fee award in

this matter would be no more than \$148,000. Thus, Plaintiffs' fee request should be reduced accordingly. This response is supported by the Declaration of Steven L. Olsen ("Olsen Dec.") filed contemporaneously herewith.

I. INTRODUCTION

Plaintiffs seek an award of \$456,478 in attorneys' fees and expenses under § 1988 as the prevailing party in these post-judgment proceedings. Plaintiffs initiated these post-judgment proceedings in April 2020 in an effort to enforce the terms of an injunctive order this Court entered in March 2018. Their fee request for close to a half million dollars is shocking for a number of reasons, primarily because the amount of fees they currently seek is six times the amount of fees they recovered in the underlying action where they obtained the initial injunction. Applying the guidelines set forth in *Hensley v. Eckerhart*, 461 U.S. 424 (1983) and its progeny governing the award of fees under § 1988, this Court should significantly reduce Plaintiffs' fee request to ensure that they do not receive a windfall and are only awarded what is reasonable in light of the circumstances of this case.¹

As a threshold matter, an award of close to half a million in legal fees for post-judgment work that occurred over a less than five-month period of time is excessive on its face. But even considering the specifics of this case, such a large fee request is not justified. In the underlying litigation, Plaintiffs obtained a ruling from this Court that the prior policy under which the Idaho Department of Health and Welfare (IDHW) processed applications to change information on one's birth certificate was unconstitutional where it violated the constitutional rights of transgender people, such as Plaintiffs, protected under the U.S. Constitution's Equal Protection Clause. In so

¹ For purposes of Plaintiffs' pending fee petition, Defendants do not dispute that Plaintiffs are the prevailing party here, as that term is defined under applicable law. But the extent to which they prevailed is limited as explained below.

ruling, the Court addressed several constitutional issues of first impression, including determining what level of constitutional scrutiny should apply to IDHW's policy moving forward and what type of injunctive relief was appropriate to prevent any further harm to Plaintiffs. After determining the applicable level of constitutional scrutiny, the Court entered an injunction prohibiting enforcement of IDHW's then-current policy. (3/5/18 Mem. Dec. & Order, Dkt. 39).

Two years after issuance of the Court's March 2018 injunction, the Idaho Legislature passed House Bill 509, which set out a new application process for obtaining changes to one's birth certificate. However, before HB 509 even became law, Plaintiffs immediately filed a motion to clarify, requesting, in expedited fashion, a prompt order declaring that HB 509 violates the March 2018 injunction. The Court refused to provide such a declaration, ruling that it was premature to reach such conclusion where it was unclear at that time what steps, if any, the IDHW would take to enforce HB 509 if and when it did become law. (6/1/20 Mem. Dec. & Order, Dkt. 58).

After the IDHW made it clear that it intended to enforce HB 509 as written once enacted, and that, in doing so, it would only honor requests to change one's birth certificate if the request was accompanied by a court order that contained certain express findings regarding any change, Plaintiffs again returned to this Court to file a second expedited motion to clarify. In their second motion, Plaintiffs sought a declaration that the IDHW's stated enforcement plan for HB 509 violates the injunction. Unlike their first attempt, Plaintiffs succeeded on their second motion. The Court granted the second motion and held that the IDHW's stated enforcement plan for HB 509 must be abandoned where it constituted a direct violation of the injunction. (8/7/20 Memo. Dec. & Order, Dkt. 75).

Admittedly, Plaintiffs are the prevailing party here, as that term is contemplated under § 1988, where they ultimately received the relief they sought concerning HB 509. But being the ultimate victor does not mean that Plaintiffs are automatically entitled to recover all of the fees and expenses requested in their fee petition. The law only permits an award of reasonable fees and expenses, and this Court has the discretion to decide what is reasonable based on the circumstances of this case. As explained below, Plaintiffs' fee request for their post-judgment work is excessive and must be reduced. The reduced award should reflect a reasonable hourly rate for Plaintiffs' counsels' post-judgment work based on Boise's prevailing market rates and should not include any of counsels' out-of-state hourly rates. The reduced award should also not include any hours counsel spent on work that was unnecessary or redundant, including Plaintiffs' first motion for clarification, which was prematurely filed and did not contribute to their ultimate victory in this matter.

II. LEGAL STANDARD

Under 42 U.S.C. § 1988, “the court, in its discretion, may allow the prevailing party . . . a reasonable attorney’s fee as part of the costs.” *Id.* § 1988(b). Courts use the lodestar method to determine a reasonable fee. *Hensley v. Eckerhart*, 461 U.S. 424, 433 (1983). Under the lodestar method, “a reasonable fee is the number of hours reasonably expended on the litigation multiplied by a reasonable hourly rate.” *Id.* “A ‘strong presumption’ exists that the lodestar figure represents a ‘reasonable’ fee, and upward adjustments of the lodestar are proper only in ‘rare’ and ‘exceptional’ cases” *Jordan v. Multnomah County*, 815 F.2d 1258, 1262 (9th Cir. 1987) (quoting *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 565 (1986) and *Blum v. Stenson*, 465 U.S. 886, 898-901 (1984)).

“In setting a reasonable attorney’s fee, the district court should make specific findings as to the rate and hours it has determined to be reasonable.” *Gracie v. Gracie*, 217 F.3d 1060, 1070 (9th Cir. 2000). The fee applicant bears the burden of establishing that the hours it claims are reasonable; and it must submit adequate documentation of those hours and provide documentation that, where appropriate, “enable[s] a reviewing court to identify distinct claims.” *Hensley*, 461 U.S. at 437.

Courts should exclude from their lodestar calculations “hours that are excessive, redundant, or otherwise unnecessary.” *Id.* at 434. *See also Idaho Conserv. League v. Magar*, 2015 WL 5469603, *3 (D. Idaho Sept. 17, 2015) (recognizing that “[t]he reasonableness inquiry is controlled by the overriding consideration of whether the attorney’s hours were ‘*necessary*’ under the circumstances”) (emphasis added). Fee-reviewing courts “need not, and indeed should not, become green-eyeshade accountants;” rather, they “may take into account their overall sense of a suit, and may use estimates in calculating and allocating an attorney’s time.” *Fox v. Vice*, 563 U.S. 826, 838 (2011).

With respect to hourly rates, “[a] district court should calculate [the] reasonable hourly rate ‘according to the prevailing market rates in the relevant community,’ which typically is the community ‘in which the district court sits.’” *Schwarz v. Sec’y of Health & Human Servs.*, 73 F.3d 895, 906 (9th Cir. 1995) (internal quotes and citations omitted). “[T]he burden is on the fee applicant to produce satisfactory evidence—in addition to the attorney’s own affidavits—that the requested rates are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience and reputation.” *Blum*, 465 U.S. at 895 n.11 (1984).

A district court has discretion to make a downward adjustment to the lodestar amount for the ultimate “results obtained” in the case. Indeed, the ultimate results obtained is a “crucial

[factor],” when assessing a reasonable attorney’s fee, “where a plaintiff is deemed ‘prevailing’ even though [the plaintiff] succeeded on only some of [its] claims for relief,” *Hensley*, 461 U.S. at 434, or prevailed only during certain stages of litigation, but not others. *See Cabrales v. County of Los Angeles*, 935 F.2d 1050 (9th Cir. 1991) (acknowledging that prevailing civil rights plaintiff may not recover attorney’s fees for unsuccessful stage of litigation that did not contribute to plaintiff’s ultimate victory).

When considering whether to make a downward adjustment based on ultimate results obtained in a case, the district court should apply a two-part analysis:

First, [it should] ask[] whether the claims upon which the plaintiff failed to prevail were related to the plaintiff’s successful claims. If unrelated, the final fee award may not include time expended on the unsuccessful claims. If the unsuccessful and successful claims are related, then the court must apply the second part of the analysis, in which the court evaluates the ‘significance of the overall relief obtained by the plaintiff in relation to the hours reasonably expended on the litigation.’ If the plaintiff obtained ‘excellent results,’ full compensation may be appropriate, *but if only ‘partial or limited success’ was obtained, full compensation may be excessive.*

Schwarz, 73 F.3d at 901-02 (quotation omitted) (emphasis added). In a case that does not involve multiple claims, but has varying stages of litigation, some in which the plaintiff did not prevail, the proper analysis in determining whether to award fees for the unsuccessful stage of litigation is whether the unsuccessful stage can be said to have contributed to the plaintiff’s ultimate victory. If it did not, fees incurred for the unsuccessful stage should be deducted from the fee award. *See Cabrales*, 935 F.2d at 1052.

When making a downward adjustment to the lodestar amount in those cases when the prevailing plaintiff has achieved only limited success, the preferred approach is to identify the specific hours spent on the unsuccessful claims, or unsuccessful stages of litigation, and eliminate those hours from the lodestar calculation. When this cannot be done for whatever reason, the district court may exercise its discretion and apply whatever mathematical calculation it believes

is appropriate under the circumstances to reduce the lodestar amount to account for the limited success achieved. *Hensley*, 461 U.S. at 436-37; *Schwarz*, 73 F.3d at 904.

Once the presumptively reasonable lodestar amount has been determined, the district court should then consider whether it is necessary to adjust this figure further based on the factors enumerated in *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67 (9th Cir. 1975), that are not already subsumed in the initial lodestar calculation. *Morales v. City of San Rafael*, 96 F.3d 359, 363–64 (9th Cir. 1996).² All in all, when considering an award of reasonable attorney’s fees, the court should keep in mind that the purpose of § 1988 is “not to provide ‘a form of economic relief to improve the financial lot of attorneys.’” *Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010) (quoting *Delaware Valley*, 478 U.S. at 565). Fee awards should “not produce windfalls to attorneys.” *Id.* (quoting *Blum*, 465 U.S. at 897).

III. ARGUMENT

A. The Number of Hours Plaintiffs’ Counsel Spent On Post-Judgment Enforcement Efforts Is Excessive and Unreasonable Under The Circumstances

1. Plaintiffs’ claim for post-judgment fees is excessive where it is more than six times the fees they recovered for securing the initial injunction

The Ninth Circuit Court of Appeals in *Webb v. Ada County, Idaho*, 195 F.3d 524, 526 (9th Cir. 1999), affirmed this Court’s reduction of hours expended and the hourly rate sought by the prevailing civil rights plaintiff in that case when calculating the lodestar amount for an award of

² The twelve *Kerr* factors include: 1) the time and labor required; 2) the novelty and difficulty of the questions involved; 3) the skill requisite to perform the legal service properly; 4) the preclusion of other employment by the attorney due to acceptance of the case; 5) the customary fee; 6) whether the fee is fixed or contingent; 7) time limitations imposed by the client or the circumstances; 8) the amount involved and the results obtained; 9) the experience, reputation, and ability of the attorneys; 10) the undesirability of the case; 11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Kerr*, 526 F.2d at 70. “Among the subsumed factors presumably taken into account in . . . the lodestar calculation are: (1) the novelty and complexity of the issues, (2) the special skill and experience of counsel, (3) the quality of representation . . . (4) the results obtained, and (5) the contingent nature of the fee agreement.” *Morales*, 96 F.3d at 364 n. 9 (internal quotations and citations omitted).

attorney fees for plaintiff's post-judgment work primarily because the issues raised in the post-judgment proceedings were not as "complex or risky" as the issues raised in the initial, underlying action. The same is true in the present case. Thus, a result similar to that reached in *Webb* should be reached here.

Here, the primary issue raised in the post-judgment proceedings was the proper scope of the Court's March 2018 injunction. In determining the scope of the injunction, there was no need for the parties to brief, or for the Court to decide or clarify, any ambiguous terms in the injunction. Instead, the Court was required to address a number of other issues, including primarily the threshold questions of ripeness and standing. (6/1/20 Memo. Decision at 6-8). Ripeness and standing are bedrock legal principles, and their general application constitutes well-established law. Ultimately, Plaintiffs' post-judgment enforcement efforts (despite their argument to the contrary) were not legally complex. Indeed, their post-judgment enforcement efforts were no more complicated, and were arguably much less complicated, than the weighty constitutional issues the parties had to grapple with in the initial proceedings leading up to issuance of the injunction.

In the initial proceedings, Plaintiffs were awarded, pursuant to a stipulation of the parties, approximately \$75,000 in attorney fees for litigating what level of constitutional scrutiny should apply to the IDHW's policy governing efforts made by transgender people to change the sex identification on their Idaho birth certificates. This issue was very complex and involved constitutional issues of first impression. The Court and the parties were also required to address what associated injunctive relief was appropriate. Plaintiffs presumably would not have agreed to accept an award of fees in the initial proceedings that did not fairly and reasonably compensate their counsel for the complex legal work their counsel performed to secure the Court's decision addressing the important constitutional issues involved and the injunctive relief Plaintiffs sought.

Thus, presumably, a fee award of \$75,000 in the initial proceedings was a reasonable fee award given the complexity of those proceedings.

For Plaintiffs to now request over six times the amount of reasonable attorneys' fees they obtained in the initial proceedings as legal fees they claim they are entitled to recover in the instant proceedings is flat-out unreasonable. This is especially so where, as explained above, the instant proceedings were far less complex and more stream-lined than the initial proceedings.³ Consistent with the analysis and result reached in *Webb*, any fee award granted to Plaintiffs in the instant matter should be reduced to reflect the less complex and short-lived nature of these post-judgment proceedings. *See Newman v. City of Payette*, 2016 WL 1611430, *3-4 (D. Id. 4/21/16) (reducing prevailing plaintiff's fee request to reflect fact that the facts and legal issues in that case were less complex than those presented in other similar civil rights cases relied upon by plaintiff in plaintiff's fee petition).

2. Because their first motion to clarify was unnecessary and did not contribute to the ultimate victory they obtained in these proceedings, Plaintiffs are not entitled to recover fees for prosecution of this motion

This Court has the discretion to reduce Plaintiffs' fee award based on the limited success that Plaintiffs obtained in these proceedings. *See Hensley*, 461 U.S. at 436-37. It can reduce Plaintiffs' fee award in one of two ways. It can either exclude the hours Plaintiffs spent on their unsuccessful claim, or unsuccessful stage of litigation, from its lodestar calculation, or it can apply whatever mathematical calculation it believes is warranted under the circumstances to reduce the lodestar amount to account for Plaintiffs' limited success. *Id.*; *Schwarz*, 73 F.3d at 904. The former

³ The duration of the initial proceedings in this matter was twice as long as the post-judgment proceedings. *See* Plfs' Complaint (Dkt. 1) filed April 2017 and Court's resultant injunctive order entered almost a year later in March 2018 (Dkt. 39). Compare this to the less than five-month period spent by counsel litigating the scope of the March 2018 injunction in the instant post-judgment proceedings. *See* Plfs' first motion to clarify filed April 2020 (Dkt. 46) and the Court's resulting (final) decision (Dkt. 75) clarifying the scope of the injunction entered in August 2020.

method should be used if the Court concludes that Plaintiffs' unsuccessful claims are unrelated to their successful claims and if the time Plaintiffs' counsel expended on the unsuccessful claims is easy to identify or isolate. If such is not the case—in other words, if the Court concludes that Plaintiffs' unsuccessful claims are related to their successful claims, or if Plaintiffs' billing records filed in support of their fee petition fail to distinguish between work spent on successful and unsuccessful claims—this Court may use the second method. *Webb v. Sloan*, 330 F.3d 1158, 1169 (9th Cir. 2003).

Long-standing Ninth Circuit precedent exists to support reducing Plaintiffs' fee award in either of these two ways. *See, e.g., Toussaint v. McCarthy*, 826 F.2d 901 (9th Cir. 1987) (in case where prison inmates brought class action challenging certain prison conditions and segregation procedures, but only a portion of district court's injunctive relief granted was upheld on appeal, Ninth Circuit held prisoners only achieved limited success on appeal, thus entitling them to only 37.5% of total lodestar amount of fees); *Schwarz*, 73 F.3d at 903-04 (affirming lower court's reduction of lodestar amount to account for deduction of time spent on plaintiff's unsuccessful claims, noting that plaintiff's unsuccessful claims were different from her one successful claim, where the claims arose from different facts and sought distinctly different relief); *Webb v. Ada County, Idaho*, 195 F.3d 524, 526-27 (9th Cir. 1999) (affirming lower court's partial award of fees to civil rights plaintiff in post-judgment proceedings, where plaintiff only partially prevailed on post-judgment issues raised, effecting a 19 to 64% reduction in legal hours requested in plaintiff's fee petition). This Court's prior fee awards are in accord. *See, e.g., United States ex rel. Madsen v. St. Luke's Health System, Ltd.*, 2020 WL 873911, *4 (D. Id. 2/21/20) (reducing lodestar amount for prevailing plaintiff's fee award by 17% to account for time plaintiff's counsel spent litigating plaintiff's unsuccessful claims); *Newman v. City of Payette*, 2016 WL 1611430, *4 (D. Id. 4/21/16)

(reducing prevailing plaintiff's fee award by 20% to account for fact that some of plaintiffs' claims were dismissed for lack of standing).

In the present matter, the relief sought in Plaintiffs' first motion to clarify—a motion they did not prevail on (their unsuccessful motion)—is different from the relief sought in their second motion to clarify, where they did prevail (their successful motion). In Plaintiffs' first motion, they effectively sought a ruling that the proposed HB 509 violated the Court's March 2018 injunction. *See* Dec. of P. Renn in Supp. of Plfs' Mot. For Fees (Dkt. #83-2) ("Renn Dec."), ¶ 21 (describing relief sought in Plaintiffs' first motion). Plaintiffs also sought a declaration that, if Defendants intended to enforce HB 509, they must first file a motion to dissolve the injunction. *Id.* The Court refused to issue either of these two rulings, ultimately concluding that the issues raised by Plaintiffs regarding HB 509 were not ripe for review. (6/1/20 Memo. Dec. at 8).⁴ Surely it would be unreasonable to require Defendants to pay for a motion that the Court denied as prematurely filed.

Unlike their first motion to clarify, in Plaintiffs' second motion, they sought a ruling that the IDHW's plans for enforcing or implementing proposed HB 509 once it became law violated the injunction. The Court agreed with Plaintiffs and granted their second motion in full. In doing so, the Court expressly concluded that the issue raised in Plaintiffs' second motion, unlike those raised in their first motion, was ripe for review. (8/7/20 Memo. Dec. at 6).

Because Plaintiffs' two motions focused on a different set of facts or course of conduct (*i.e.*, HB 509 itself vs. the IDHW's specific enforcement plan for HB 509) and each sought distinctly different relief, the two motions should be deemed unrelated for purposes of this Court's lodestar calculation. Further, because the primary issue framed in Plaintiffs' first motion to clarify was an issue the Court concluded was not ripe for review at the time that motion was filed, it can

⁴ Defendants raised the ripeness argument in their opposition to Plaintiffs' first motion to clarify, (Defs' Opp. Br. (Dkt. 70) at 10-11), and prevailed on that argument.

hardly be said that Plaintiffs' first motion was a "necessary" step to Plaintiffs achieving the success they eventually obtained with their second motion. Because Plaintiffs' first unsuccessful motion was not a necessary step to achieving the success they obtained with their second motion, pursuant to the foregoing authority, this Court should exclude from its lodestar calculation any hours spent by Plaintiffs' counsel prosecuting Plaintiffs' first motion to clarify. *Compare Cabrales*, 935 F.2d at 1052-53 (concluding that prevailing plaintiff was entitled to recover fees for unsuccessfully opposing defendant's first petition for writ of certiorari only because that stage of litigation was "a necessary step" to helping plaintiff obtain the ultimate victory it achieved in that case).

A review of the billing statements submitted by Plaintiffs in support of their fee petition reveals that their counsel spent 218.2 attorney hours and 12.4 paralegal hours (for a total of 230.6 hours) prosecuting Plaintiffs' first motion to clarify. *See Exhibits A-1 and A-2* to Olsen Dec.⁵ These hours equate to \$119,011.50 in requested fees.⁶ For the foregoing reasons, when engaging in its lodestar calculation, the Court should deduct from its reasonable hour calculation all of the hours spent by Plaintiffs' counsel (and paralegal) in prosecuting Plaintiffs' unsuccessful first motion to clarify. *See Exhibit D* to Olsen Dec. for Defendants' overall re-calculation in this regard.

3. Plaintiffs' post-judgment efforts did not require hiring more attorneys than those utilized to secure the injunction

In their moving papers, Plaintiffs acknowledge that several lawyers from the Covington & Burling law firm—a law firm not involved in the underlying litigation—were retained to assist with Plaintiffs' post-judgment enforcement efforts. *See Renn Dec.*, ¶ 67. Although six (6) lawyers

⁵ Exhibit A-1 to the Olsen Declaration is a copy of the billing entries Plaintiffs submitted in support of their fee petition with those entries relating to Plaintiffs' first motion to clarify highlighted in red. Exhibit A-2 is a tally of the hours spent by each attorney and related fees concerning Plaintiffs' counsel' work on the first motion to clarify.

⁶ This figure was arrived at by taking the hours billed by each of Plaintiffs' counsel and their paralegal and multiplying those hours by each counsel's respective hourly rate as identified in Plaintiffs' fee petition.

from the Covington law firm assisted with Plaintiffs' enforcement efforts, Plaintiffs only seek to recover fees, utilizing corresponding Boise rates, for the hours spent by three of these six lawyers: Isaac Belfer, Michael Lanosa and Colleen Smith. *Id.* at ¶¶ 67-68.

Plaintiffs' retention of the Covington lawyers to assist with preparing their two motions to clarify and with Plaintiffs' other related post-judgment efforts unnecessarily increased the attorney fees in this case.⁷ Hiring additional attorneys with LGBT litigation experience to assist with Plaintiffs' post-judgment efforts was unnecessary given that the instant proceedings were not about LGBT constitutional rights, as was the case in the initial proceedings. Rather, the instant proceedings involved only enforcement of what was otherwise an unambiguously-worded injunction. Further, the retention of additional attorneys in this matter contradicts Plaintiffs' argument that they needed to use those out-of-state attorneys who represented them in the initial proceedings to assist in the post-judgment proceedings because of the familiarity those attorneys had with the underlying constitutional issues. If that were, in fact, the case, it makes little sense why the new Covington attorneys were needed to assist in the post-judgment proceedings, when those attorneys had no special familiarity with any of the underlying facts or issues. Because hiring the Covington attorneys was unnecessary and redundant, all of Plaintiffs' requested fees for the Covington attorneys should be deducted from the Court's lodestar calculation.⁸

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⁷ By focusing only on certain specific time entries offered in support of Plaintiffs' fee petition, Defendants are not conceding to the reasonableness of any of Plaintiffs' requested fees that are not specifically mentioned in this brief. Rather, Defendants have simply chosen to focus on the more egregious excesses contained in Plaintiffs' fee petition.

⁸ According to the table on pages 19 and 20 of Plaintiffs' fee petition, the total fees associated with the time expended by the three Covington attorneys is \$51,645. This amount should be deducted from any fee award made.

4. The hours spent preparing Plaintiffs' fee petition are excessive

A review of Plaintiffs' billing statements reveals that Plaintiffs' counsel spent a total of 189.8 attorney hours and 7.5 paralegal hours—a whopping total of \$86,815.50 in requested legal fees—preparing Plaintiffs' fee petition. *See Exhibit B-1 and B-2* to Olsen Dec.⁹ These hours and associated fees are excessive and unwarranted and should be reduced.

The Ninth Circuit has routinely held that, if a prevailing party's fee request related to work on the merits of the case is reduced to account for the prevailing party's limited success on the merits, a corresponding reduction should also be made to the prevailing party's fees-on-fees request (*i.e.*, those incurred in preparing the fee petition). *See Schwarz*, 73 F.3d at 909 (“A district court does not abuse its discretion by applying the same percentage of merits fees ultimately recovered to determine the proper amount of the fees-on-fees award”). When this happens, no further explanation for the fees-on-fees reduction is needed, as long as the district court explains its reduction for the merits fee award. *Id.*

That principle should be applied here. This Court should reduce Plaintiffs' fees-on-fees request by the same percentage reduction it applies to Plaintiffs' merit-based fee request. *See Webb*, 195 F.3d at 526 n.2 (encouraging lower court to apply *Schwarz*'s merit fees versus fees-on-fees methodology on remand).

There are other, independent reasons for substantially reducing Plaintiffs' enormous fees-on-fees request. This Court in *Latta v. Otter*, 2014 WL 7245631 (D. Idaho Dec. 19, 2014), recognized that preparing a fee petition and related documents is not “complex legal work;” indeed, as this Court noted, such work “barely qualifies as legal work.” *Id.* at *9. In *Latta*, which

⁹ Exhibit B-1 to the Olsen Declaration is a copy of the billing entries Plaintiffs submitted in support of their fee petition with those entries relating to Plaintiffs' fee petition highlighted in red. Exhibit B-2 is a tally of the hours spent by each attorney and related requested fees concerning Plaintiffs' counsel' work on the fee petition.

was a case involving weighty constitutional issues of first impression concerning the issue of same sex marriage, this Court held that 77.7 hours spent preparing the plaintiffs' fee petition was excessive. *Id.* The Court, therefore, reduced plaintiffs' fees-on-fees award to reflect 40 hours for work on the fee petition, which the Court deemed was reasonable given the nature of that case and related fee petition. *Id.* at *10.

Here, as previously noted, Plaintiffs' counsel spent over 197 legal hours preparing Plaintiffs' fee petition and supporting documents. Plaintiffs also intend to add to their fee request the hours they will spend preparing a reply brief in support of their fee petition. For the same reasons noted in *Latta*, this Court should conclude that over 197 legal hours spent to date prosecuting a fee petition in a case such as this one—involving just two post-judgment proceedings over a five-month period that did not involve the litigation of any complex legal issues—is excessive. As in *Latta*, Plaintiffs' fees-on-fees request should be reduced to no more than 40 total hours, and these hours should be billed at the corresponding Boise rates for each of Plaintiffs' counsel as explained below.¹⁰ Under this method, Plaintiffs' total fees-on-fees award should be reduced to a reasonable amount of no more than \$11,800. *See Exhibit C* to Olsen Dec. (setting forth Defendants' adjusted fees-on-fees calculation).

B. The Hourly Rates Of Out-Of-State Counsel Are Not Warranted, Where Counsel Contributed No Special Expertise To The Post-Judgment Proceedings

1. The relevant legal expertise is expertise in post-judgment enforcement of an injunctive order, which out-of-state counsel does not appear to have

Plaintiffs concede that the relevant legal community for determining the prevailing market hourly rate for counsel's time usually is where the district court sits (which here is Boise, Idaho).

¹⁰ Plaintiffs cannot reasonably argue that their out-of-state counsel brought any special expertise to preparing their fee petition. Thus, time spent by out-of-state counsel preparing Plaintiffs' fee petition should be billed using forum rates, not out-of-state rates.

However, they argue that a recognized exception to this rule applies, which is that rates outside the forum may be utilized in calculating the lodestar amount when special circumstances exist, such as when out-of-state counsel's expertise is reasonably necessary to litigate the unique claims or issue in the case, or, in other words, when a case requires specialized legal expertise that is not available in the forum state. Plaintiffs argue that the post-judgment motions in this case involved special circumstances justifying the need to retain out-of-state counsel who have unique and extensive experience litigating the constitutional rights of transgender people. Consequently, they argue that out-of-state counsel's home rates should be applied to the time expended in this matter by out-of-state counsel, specifically, those attorneys employed by Lambda Legal in Los Angeles and Chicago, including Peter Renn, Kara Ingelhart and Nora Huppert.

The fatal flaw in Plaintiffs' argument here is that the legal expertise relevant to the post-judgment proceedings is not expertise in litigating the constitutional rights of transgender people. Rather, the relevant legal expertise is expertise in post-judgment enforcement of an injunctive order and application of that order to potential new law. There is no evidence in the record, however, suggesting that any of the three Lambda Legal attorneys who billed time in this matter have any unique experience litigating post-judgment enforcement of an injunctive order and, in particular, litigating how such an injunction might apply to a new statute. As previously noted, unlike the underlying proceedings where the constitutional rights of transgender people were front and center, the primary issues in the instant proceedings involved application of an unambiguous injunction to new law. These issues are not unique to litigating the constitutional rights of transgender people, which is the special legal expertise out-of-state counsel claims to have here.

Where no evidence exists that the legal expertise relevant to the post-judgment enforcement proceedings was unavailable in the relevant forum (Boise, Idaho), no basis exists to

deviate from the general rule, which requires this Court to utilize forum rates (Boise rates) when calculating the lodestar amount for Plaintiffs' fee award. Simply put, Plaintiffs have not met their burden of establishing that the use of out-of-state hourly rates would be reasonable or justified in this case.¹¹

2. The post-judgment circumstances here were so unique that no lawyer could be said to have special expertise dealing with these circumstances

Alternatively, assuming some specialized legal expertise was, in fact, reasonably required to litigate the issues raised in the instant proceedings, there is no evidence before this Court that any of the out-of-state Lambda Legal attorneys have that specialized legal expertise. Plaintiffs themselves argued in their moving papers that these post-judgment proceedings involved "extraordinary" circumstances where there simply was "no defined path" for how this post-judgment litigation should unfold. (Memo. in Supp. of Plfs' Mot. for Fees at 1, 3). Essentially, they argue that there is no precedent for litigating the type of unique circumstances present in this case. Assuming *arguendo* that that is true, by the very nature of this argument, no attorney can be said to have the special expertise needed to handle this case's unique circumstances.

Absent any evidence that out-of-state counsel had any specialized legal expertise that was relevant to these proceedings, the Court should reject Plaintiffs' argument that utilizing out-of-state counsel's higher hourly rates is reasonable when calculating the lodestar amount for Plaintiffs' fee award.

¹¹ Defendants acknowledge that there was likely some benefit to hiring the Lambda Legal attorneys who handled the initial proceedings to pursue Plaintiffs' post-judgment enforcement efforts because of their familiarity with the issues raised in the underlying matter. But out-of-state counsels' familiarity with the issues from the initial proceedings was not necessary to adequately represent Plaintiffs in the post-judgment enforcement proceedings, where the subject injunctive order contained plain and clear language and did not require any specialized knowledge, or background understanding by counsel to help the Court decipher, for example, any ambiguity in the order. In short, where out-of-state counsel brought no specialized expertise to these proceedings, their time expended in this matter should be billed at forum rates.

3. Because Lambda Legal’s counsel offered no unique expertise, their time should be billed at Boise’s prevailing market rates

For the reasons stated above, the Court, when calculating the lodestar amount, should apply Boise’s prevailing market rates to all of Plaintiffs’ counsels’ time reasonably expended in this matter, including time expended by Plaintiffs’ out-of-state Lambda Legal counsel. In terms of what rates are reasonable and accurately represent Boise’s prevailing market rates, Defendants will agree, for purposes of Plaintiffs’ pending fee petition only, that the Boise hourly rates identified in the Declaration of Idaho counsel, Thomas Lloyd, (Dkt. 83-5), represent reasonable rates to be applied by the Court in its lodestar calculation. Even though a close review of the Boise hourly rates identified in Mr. Lloyd’s declaration suggest that those rates actually fall more in the very high end of what Defendants believe constitute the true prevailing market rates in Boise, in the interest of compromise and to avoid wasting the Court’s precious time and resources, Defendants will accept these rates as the relevant rates to be applied when calculating Plaintiffs’ ultimate fee award.

For Defendants’ overall calculation and summary of what constitutes a reasonable amount of time expended in this matter by Plaintiffs’ counsel multiplied by the corresponding Boise rates for each of Plaintiffs’ lawyers, and what Defendants believe represents a reasonable award of attorney’s fees in this matter, see **Exhibit D** to the Olsen Declaration. As noted in Defendants’ **Exhibit D**, a reasonable award of attorney’s fees in this matter should not exceed \$148,000.

IV. CONCLUSION

For the foregoing reasons, Defendants respectfully request that the Court reduce Plaintiffs’ fee request accordingly, as set forth above.

DATED this 19th day of November, 2021.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By: /s/ Steven L. Olsen
STEVEN L. OLSEN
Deputy Attorney General

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of November, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following Persons:

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By: /s/ Steven L. Olsen
STEVEN L. OLSEN

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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

F.V. and DANI MARTIN,

Plaintiffs,

vs.

DAVID JEPPESEN, in his official capacity as
Director of the Idaho Department of Health
and Welfare and ELKE SHAW-TULLOCH,
in her official capacity as Administrator of the
Division of Public Health the Idaho
Department of Health and Welfare, and
JAMES AYDELOTTE, in his official capacity
as State Registrar and Chief of the Bureau of
Vital Records and Health Statistics,

Defendants.

Case No. 1:17-cv-000170-CWD

**DECLARATION OF
STEVEN L. OLSEN**

I, Steven L. Olsen, declare as follows:

1. I am a Deputy Attorney General for the State of Idaho and counsel for the State Defendants in this proceeding.

2. Attached hereto as Exhibit A-1 in PDF format is a copy of the billing entries Plaintiffs submitted in support of their fee petition which I have reviewed. Based on the

description of the billing entries, I have highlighted in red the time spent by Plaintiffs' attorneys and paralegals on Plaintiffs' first motion to clarify [Dkt. 46].

3. Using the billing entries in Exhibit A-1, I tallied in the attached Exhibit A-2, the hours spent by each attorney/paralegal and the related fees concerning Plaintiffs' counsels' work on the first motion to clarify [Dkt. 46].

4. Attached hereto as Exhibit B-1 in PDF format is a copy of the billing entries Plaintiffs submitted in support of their fee petition which I have reviewed. Based on the description of the billing entries, I have highlighted in red the time spent by Plaintiffs' attorneys and paralegals on Plaintiffs' motion for attorney fees and expenses [Dkt. 83].

5. Using the billing entries in Exhibit B-1, I tallied in the attached Exhibit B-2 the hours spent by each attorney/paralegal and related fees concerning Plaintiffs' counsels' work on their request for legal fees.

6. Attached hereto as Exhibit C is a summary of Plaintiffs' counsels' adjusted hour and rates for Plaintiffs' fee petition (fees-on-fees).

7. Attached hereto as Exhibit D is a summary of Plaintiffs' counsels' adjusted hours and rates for all post-judgment work.

I, Steven L. Olsen, hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED this 19th day of November, 2021.

By: /s/ Steven L. Olsen
Steven L. Olsen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of November, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following Persons:

Monica G. Cockerille
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*Attorneys for Plaintiffs F.V. and
Dani Martin*

Michael J. Lanosa
mlanosa@cov.com

By: /s/ Steven L. Olsen
STEVEN L. OLSEN

F.V. v. Jeppesen
Time Sheet for Attorney Peter Renn

EXHIBIT A-1

Date	Description	Time Spent	Time Billed
3/20/2020	Analyze case filings in federal lawsuit filed by NAATP raising allegations regarding HB 509 and potential implications for further litigation in F.V	0.9	0
3/20/2020	Email with M.R. of NAATP regarding case filings in light of potential implications for further litigation in F.V.	0.2	0
3/20/2020	Draft agenda for issues to discuss with M.R. regarding NAATP litigation in light of potential implications for further litigation in F.V.	0.3	0
3/23/2020	Draft list of tasks to prepare for litigation relating to HB 509 and agenda for litigation team conference.	0.5	0.5
3/23/2020	Telephone conference with litigation team to discuss initial tasks to prepare for litigation relating to HB 509.	1.4	1.4
3/23/2020	Telephone conference with M.R. regarding NAATP litigation in light of potential implications for further litigation in F.V.	0.3	0
3/30/2020	Draft agenda for issues to discuss during conference with litigation team.	0.5	0.5
3/30/2020	Review and analyze preclusion research findings from Ms. Huppert as potential basis for challenging HB 509.	0.5	0.5
3/30/2020	Telephone conference with litigation team to discuss initial tasks to prepare for litigation relating to HB 509.	1	1
3/31/2020	Telephone conference with Lambda Legal attorney T. Borelli to consult regarding litigation strategy.	0.7	0.7
3/31/2020	Analyze and research potential procedural options for confirming HB 509 violates existing injunction.	1.3	1.3
3/31/2020	Telephone conference with Ms. Huppert to discuss dissolution research.	0.3	0.3
3/31/2020	Review and analyze new statutory language.	1.4	1.4
4/1/2020	Telephone conference with Ms. Ingelhart re: statutory interpretation of HB 509 and dissolution motion.	0.4	0.4
4/1/2020	Telephone conference with Ms. Farnsworth re legislative history research.	0.3	0.3
4/1/2020	Telephone conference with Ms. Huppert re: research on existing injunction and 509.	0.7	0.7
4/1/2020	Analyze research from Ms. Huppert re: Rule 60.	0.5	0.5
4/2/2020	Telephone conference with M.R. re: NAATP litigation in light of potential implications for further litigation in F.V.	0.1	0
4/2/2020	Telephone conference with Mr. Zanzig re: legal challenge to HB 509.	0.9	0.9
4/2/2020	Email Ms. Ingelhart, Ms. Huppert, and Ms. Cockerille re: communication with Mr. Zanzig.	0.8	0.8
4/2/2020	Analyze and research legal issues for challenge to 509, including FV decision, potential motion for clarification, contempt, and Rule 60.	3.9	3.9
4/3/2020	Emails with Ms. Ingelhart and Ms. Huppert re: potential co-counsel.	0.5	0
4/3/2020	Analyze initial litigation tasks to accomplish and potential division of labor.	1.3	1.3
4/3/2020	Draft outline of potential motion seeking relief.	1.8	1.8
4/6/2020	Draft outline of potential motion seeking relief.	1.1	1.1
4/6/2020	Emails with Ms. Taylor, Mr. Castillo, Ms. Ingelhart, Ms. Huppert, and Ms. Cockerille re: potential co-counsel.	0.4	0
4/6/2020	Draft agenda for litigation team call with initial litigation tasks to accomplish.	1.3	1.3
4/6/2020	Draft outline of motion for clarification.	1.2	1.2

4/6/2020	Telephone conference with Ms. Ingelhart, Ms. Huppert, and Ms. Cockerille re: initial litigation tasks.	1.5	1.5
4/6/2020	Telephone conference with individual potentially harmed by HB 509, J-W.	1	1
4/6/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert re: communication with J-W.	1	1
4/7/2020	Prepare for call with potential Covington co-counsel Mr. Isasi, Ms. Veta, and Mr. Liu.	1.3	0
4/7/2020	Telephone conference with potential Covington co-counsel.	0.7	0
4/7/2020	Telephone conference with Ms. Ingelhart re: potential Covington co-counsel.	0.3	0
4/7/2020	Research for motion for clarification	1.4	1.4
4/7/2020	Analyze and revise co-counsel agreement for Covington.	0.8	0
4/7/2020	Email Mr. Castillo regarding co-counsel agreement with Covington.	0.3	0
4/8/2020	Email with Ms. Farnsworth regarding research regarding lawmaker statements.	0.3	0.3
4/8/2020	Draft motion for clarification.	3.7	3.7
4/8/2020	Research for motion for clarification.	0.6	0.6
4/8/2020	Telephone conference with Mr. Castillo regarding co-counseling with Covington.	0.3	0
4/8/2020	Draft email to Covington team regarding co-counseling.	0.5	0
4/8/2020	Telephone conference with Ms. Ingelhart regarding co-counseling with Covington.	0.3	0
4/9/2020	Draft motion for clarification.	6.7	6.7
4/10/2020	Draft co-counsel agreement; email Covington re: same.	1.2	0
4/10/2020	Draft agenda for litigation team call with initial litigation tasks.	0.7	0.7
4/10/2020	Telephone conference with Ms. Huppert regarding research for motion for clarification.	0.5	0.5
4/10/2020	Research and draft motion for clarification.	3	3
4/10/2020	Telephone conference with full litigation team regarding initial litigation tasks.	1.1	1.1
4/11/2020	Research and draft motion for clarification.	5.1	5.1
4/12/2020	Draft motion for clarification.	5.1	5.1
4/13/2020	Draft motion for clarification.	12.4	12.4
4/14/2020	Email Ms. Ingelhart regarding review of motion.	0.1	0.1
4/14/2020	Email Ms. Martin regarding further litigation.	0.1	0.1
4/14/2020	Email Ms. Farnsworth regarding lawmaker statements and review of brief.	0.2	0.2
4/14/2020	Email Ms. Huppert regarding further research tasks relevant to clarification motion.	0.2	0.2
4/14/2020	Email Ms. Cockerille regarding options to shorten time.	0.4	0.4
4/14/2020	Review additional recorded legislative proceedings.	2.1	2.1
4/14/2020	Telephone conference with Ms. Cockerille regarding potentially shortening time.	0.2	0.2

4/14/2020	Draft motion for clarification and motion to shorten time.	2.3	2.3
4/14/2020	Draft proposed order to shorten time and review rules for same.	0.4	0.4
4/15/2020	Email Ms. Smith regarding revisions to motion for clarification; review suggested revisions.	0.6	0.6
4/15/2020	Email with Ms. Cockerille regarding revisions to motion for clarification and to shorten time.	0.2	0.2
4/15/2020	Revise motion for clarification	1.8	1.8
4/15/2020	Revise motion for clarification and to shorten time; email litigation team re: same.	4.6	4.6
4/15/2020	Telephone conference with individual potentially harmed by HB 509, L.B., regarding potential participation in litigation	1.3	1.3
4/15/2020	Draft email to Mr. Zanzig re: forthcoming motions, to transmit on filing day.	0.4	0.4
4/17/2020	Draft agenda for weekly litigation call.	0.5	0.5
4/17/2020	Attend weekly litigation call to discuss litigation tasks and division of labor, including further research in support of clarification motion.	0.9	0.9
4/17/2020	Review order shortening time and setting hearing; review general order cited in order.	0.2	0.2
4/17/2020	Review complaint in related litigation challenging HB 500 with potential implications for litigation in F.V.	0.5	0
4/23/2020	Email Ms. Ingelhart re: legislative justifications for HB 509.	0.3	0.3
4/24/2020	Email with Ms. Farnsworth regarding sharing of documents with Covington.	0.1	0.1
4/24/2020	Research on standing/mootness for clarification reply.	2.9	2.9
4/24/2020	Research FRCP 60(b)(5) case law.	2.6	2.6
4/27/2020	Prepare agenda for weekly team call to discuss litigation tasks.	0.5	0.5
4/27/2020	Telephone conference with litigation team to discuss litigation tasks and division of labor, including further research in support of clarification motion and development of facts relevant to HB 509.	1	1
4/27/2020	Review HB 509 legislative justification rebuttal outline from Ms. Ingelhart and comment on same.	1.7	1.7
4/27/2020	Review legislative history for justification rebuttal outline.	0.3	0.3
4/27/2020	Telephone conference with Ms. Ingelhart re: identification of individuals potentially harmed by HB 509.	0.2	0.2
4/27/2020	Telephone conference with Ms. Huppert re: injunction dissolution research.	0.3	0.3
4/27/2020	Email Ms. Huppert re: health research justification for HB 509.	0.4	0.4
4/27/2020	Telephone conference with Ms. Borelli re: co-counsel agreement.	0.4	0
4/28/2020	Email Ms. Taylor re: co-counsel agreement.	0.8	0
4/28/2020	Telephone conference with Ms. Taylor re: co-counsel agreement.	0.4	0
4/28/2020	Email Ms. Ingelhart re: co-counsel agreement.	0.3	0
4/28/2020	Review informal transcripts of legislative proceedings, and annotate same.	0.8	0.8
4/29/2020	Draft email to Ms. Taylor re: co-counsel agreement.	0.6	0
4/29/2020	Review informal transcripts of legislative proceedings, and annotate same.	0.8	0.8

4/29/2020	Telephone conference with Ms. Taylor and Ms. Veta re: co-counsel agreement.	0.3	0
4/29/2020	Telephone conference with Ms. Taylor re: co-counsel agreement.	0.1	0
4/29/2020	Email Ms. Ingelhart and Ms. Huppert re: co-counsel agreement.	0.3	0
4/29/2020	Draft email to Ms. McGowan re: co-counseling with Covington.	0.7	0
4/30/2020	Review informal transcripts of legislative proceedings, and annotate same.	3.7	3.7
5/1/2020	Review informal transcripts of legislative proceedings, and annotate same.	3.2	3.2
5/1/2020	Telephone conferences with Ms. Taylor re: co-counsel agreement.	0.3	0
5/1/2020	Telephone conference with Ms. Veta re: co-counsel agreement.	0.1	0
5/1/2020	Analyze potential arrangement with co-counsel and email with Ms. Taylor and Ms. McGowan regarding same.	2.2	0
5/1/2020	Review and analyze opposition to motion for clarification.	1.5	1.5
5/2/2020	Review and analyze opposition to motion for clarification; draft analysis for reply.	5	5
5/2/2020	Research for reply to motion for clarification.	0.5	0.5
5/3/2020	Research for reply to motion for clarification.	2.9	2.9
5/4/2020	Draft reply to motion for clarification.	8.3	8.3
5/5/2020	Draft reply to motion for clarification.	9.8	9.8
5/5/2020	Email Mr. Belfer re: research findings on standing and related issues.	0.3	0.3
5/6/2020	Draft reply to motion for clarification.	11.6	11.6
5/7/2020	Email Ms. Ingelhart regarding legislative testimony re: HB 509.	0.4	0.4
5/7/2020	Review revised co-counsel agreement.	0.2	0
5/7/2020	Email with Ms. Taylor re: co-counsel agreement.	0.3	0
5/7/2020	Email Ms. Veta re: co-counsel agreement.	0.2	0
5/7/2020	Revise draft of reply to motion for clarification.	0.4	0.4
5/7/2020	Email Ms. Cockerille re: co-counsel agreement.	0.3	0
5/7/2020	Analyze facts regarding individual potentially harmed by HB 509 and email Ms. Ingelhart and Ms. Huppert re: same.	1.1	1.1
5/7/2020	Email Covington team re: potential strategy, including PI/TRO considerations.	0.7	0.7
5/8/2020	Revise draft reply to motion for clarification.	5.5	5.5
5/8/2020	Email Mr. Liu re: revisions to draft of reply to motion for clarification.	0.5	0.5
5/10/2020	Email Ms. Huppert re: supplemental research relevant to reply brief.	0.2	0.2
5/10/2020	Research case law regarding consent decrees for reply brief.	1.1	1.1
5/10/2020	Review and revise reply to motion for clarification.	0.9	0.9
5/11/2020	Review reply brief prior to filing.	0.3	0.3

5/11/2020	Review new social science research relevant to corrected identity documents; email litigation team re: same.	0.3	0.3
5/11/2020	Draft agenda for weekly litigation call.	0.4	0.4
5/11/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and division of labor, including upcoming moot on motion, and further development of facts relevant to HB 509.	1.1	1.1
5/11/2020	Revise public records request relevant to HB 509.	1.5	1.5
5/11/2020	Analyze potential timing of filings in new case, if required, and impact of pending motion for clarification; draft email to Ms. Cockerille re: same.	1.7	1.7
5/11/2020	Telephone conference with Ms. Borelli potential timing of filings in new case, if required.	0.4	0.4
5/11/2020	Telephone conference with Ms. Cockerille re: potential timing of filings in new case, if required.	0.5	0.5
5/11/2020	Email litigation team re: potential preliminary injunction before HB 509 effective date.	0.6	0.6
5/11/2020	Email Ms. Ingelhart re: organizations potentially harmed by HB 509	0.3	0.3
5/11/2020	Telephone conference with individual potentially harmed by HB 509, K.C.	0.7	0.7
5/11/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert re: individual potentially harmed by HB 509, K.C.	0.4	0.4
5/11/2020	Review and revise public records request relevant to HB 509; email Ms. Farnsworth and Ms. Huppert re: same.	1.5	1.5
5/12/2020	Email Ms. Cockerille re: email from Ms. Thompson regarding hearing on motion.	0.6	0.6
5/12/2020	Prepare for hearing on motion for clarification.	3.3	3.3
5/13/2020	Email F.V. regarding additional fact gathering.	0.5	0.5
5/13/2020	Email Ms. Ingelhart and Ms. Huppert re: communications with F.V.	0.3	0.3
5/13/2020	Prepare for oral argument on motion for clarification.	5.9	5.9
5/13/2020	Prepare for and attend telephone conference with F.V. to gather additional facts.	0.9	0.9
5/13/2020	Analyze additional facts gathered from F.V.	0.4	0.4
5/15/2020	Review edits to public records request and email Ms. Huppert re: same.	0.3	0.3
5/15/2020	Prepare for oral argument on motion for clarification.	3.7	3.7
5/15/2020	Participate in moot on motion for clarification.	1.5	1.5
5/17/2020	Prepare for oral argument on motion for clarification.	6.2	6.2
5/18/2020	Prepare for oral argument on motion for clarification.	6.1	6.1
5/18/2020	Review summary from Ms. Ingelhart of conversations with potential expert witness Ms. W.	0.4	0.4
5/18/2020	Telephone conference with litigation team to discuss weekly tasks and division of labor, including potential justification briefing, and further development of facts relevant to HB 509.	1	1
5/19/2020	Prepare for and attend hearing on motion for clarification.	3.3	3.3
5/19/2020	Debrief regarding hearing on motion for clarification with litigation team.	0.4	0.4
5/26/2020	Email Ms. Ingelhart re: organization potentially harmed by HB 509.	0.4	0.4

5/26/2020	Email Ms. Ingelhart and Ms. Huppert re: oral argument on motion for clarification.	0.3	0.3
5/26/2020	Draft agenda for weekly litigation call.	0.4	0.4
5/26/2020	Attend weekly litigation call to discuss litigation tasks and division of labor, including further research to support clarification motion, and development of facts relevant to HB 509.	1.1	1.1
5/26/2020	Draft update to clients regarding hearing on motion for clarification.	0.3	0.3
5/26/2020	Email litigation team regarding fact development and potential experts relevant to HB 509.	0.2	0.2
5/29/2020	Telephone conference with Mr. Olsen re: public records request relevant to HB 509.	0.4	0.4
5/29/2020	Telephone conference with Ms. Huppert and Ms. Ingelhart re: conversation with Mr. Olsen.	0.6	0.6
6/1/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and status, including potential need for further motion seeking relief relating to HB 509.	1	1
6/1/2020	Analyze decision on motion to clarify.	0.5	0.5
6/1/2020	Email with litigation team regarding analysis of order on motion to clarify.	0.7	0.7
6/1/2020	Email plaintiffs re: decision on motion to clarify.	0.3	0.3
6/1/2020	Email Ms. Huppert re: attorneys' fees from motion to clarify.	0.3	0.3
6/2/2020	Email Ms. Huppert re: attorneys' fees from motion to clarify.	0.2	0.2
6/8/2020	Review and comment on outline regarding justifications for HB 509.	1.2	1.2
6/8/2020	Draft agenda for litigation team call.	0.3	0.3
6/8/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and status, including next steps following order on clarification motion.	0.6	0.6
6/8/2020	Telephone conference with Ms. Ingelhart re: potential experts relevant to HB 509.	0.4	0.4
6/9/2020	Review and revise stipulation and order regarding fees and email Ms. Huppert re: same.	0.7	0.7
6/10/2020	Email Ms. Huppert re: communications with opposing counsel regarding stipulation and order on fees.	0.3	0.3
6/10/2020	Draft email to Mr. Olsen re: defendants' future actions in light of clarification order; analyze order for same; email litigation team re: proposed communication.	1.3	1.3
6/10/2020	Review and analyze research re: post-judgment discovery and email Ms. Smith re: same.	0.5	0.5
6/12/2020	Revise stipulation and order regarding fees; email with Mr. Olsen re: same; finalize documents for filing.	0.3	0.3
6/15/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and status, including potential next steps after effective date of HB 509.	0.4	0.4
6/15/2020	Draft agenda for telephone conference with litigation team for weekly call to discuss litigation tasks and status.	0.2	0.2
6/16/2020	Telephone conference with Mr. Olsen re: Defendants' next steps.	0.4	0.4
6/16/2020	Email litigation team regarding telephone conference with Mr. Olsen and potential next steps.	0.8	0.8
6/16/2020	Analyze potential next steps regarding Defendants' enforcement plan and draft proposed correspondence to Mr. Olsen for feedback from litigation team.	1.9	1.9
6/16/2020	Email Ms. Huppert re: next steps for beneficiary of injunction who would be harmed by HB 509 enforcement.	0.2	0.2

6/17/2020	Revise proposed correspondence to Mr. Olsen and email litigation team re: same.	0.8	0.8
6/17/2020	Telephone conference with Mr. Liu re: next steps with respect to Mr. Olsen.	0.4	0.4
6/17/2020	Email litigation team regarding potential status conference to address defendants' enforcement of HB 509.	0.2	0.2
6/17/2020	Draft proposed communication to chambers requesting status conference for review by litigation team; email litigation team re: same.	1	1
6/17/2020	Draft proposed status report to address defendants' enforcement of HB 509.	0.5	0.5
6/18/2020	Draft proposed status report to address defendants' enforcement of HB 509.	3.7	3.7
6/18/2020	Telephone conference with Ms. Cockerille regarding notice to Defendants regarding request for status conference.	0.2	0.2
6/18/2020	Email litigation team regarding notice to Defendants regarding request for status conference and revisions to email to chambers.	0.3	0.3
6/18/2020	Review letter from Mr. Olsen re: enforcement plans.	0.2	0.2
6/18/2020	Revise draft email to chambers requesting status conference.	0.7	0.7
6/18/2020	Email Mr. Olsen regarding request for status conference.	0.3	0.3
6/18/2020	Email Ms. Huppert re: public records request and confidentiality restrictions requested for same.	0.3	0.3
6/18/2020	Email Ms. Ingelhart regarding potential expert witness relevant to HB 509.	0.2	0.2
6/19/2020	Draft motion seeking further clarification relief.	3.5	3.5
6/20/2020	Draft motion seeking further clarification relief and research for same.	12.1	12.1
6/20/2020	Telephone conference with Ms. Huppert regarding public records request documents and motion for further clarification.	0.7	0.7
6/21/2020	Draft motion seeking further clarification relief and research for same.	14	14
6/22/2020	Revise motion seeking further clarification relief.	3.9	3.9
6/22/2020	Draft agenda for litigation team call to discuss tasks and division of labor.	0.1	0.1
6/22/2020	Telephone conference with litigation team to discuss motion for clarification and documents produced in response to public records request.	0.4	0.4
6/22/2020	Revise motion seeking further clarification relief; draft cover motion and attorney declaration.	1.7	1.7
6/22/2020	Revise motion seeking further clarification relief	1.5	1.5
6/22/2020	Review and finalize brief for filing.	1.4	1.4
6/24/2020	Telephone conference with Ms. Ingelhart regarding oral argument on motion for clarification.	0.2	0.2
6/24/2020	Telephone conference with Ms. Huppert regarding oral argument on motion for clarification	0.2	0.2
6/24/2020	Email with F.V. regarding status and timeline of litigation.	0.5	0.5
6/24/2020	Email with litigation team regarding court email regarding briefing schedule.	0.1	0.1
6/25/2020	Email Mr. Liu regarding ripeness argument for motion for clarification.	0.3	0.3
6/25/2020	Emails with Ms. Ingelhart, Ms. Huppert, and others re: communications with individuals potentially harmed by HB 509.	0.5	0.5
6/26/2020	Telephone conference with Dr. H., Ms. Ingelhart, and Ms. Huppert re: potential expert testimony relevant to HB 509.	1	1
6/26/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert to debrief re: potential expert testimony of Dr. H. relevant to HB 509.	0.4	0.4

6/29/2020	Draft agenda for weekly litigation call to discuss updates and tasks.	0.2	0.2
6/29/2020	Telephone conference with litigation team to discuss updates and tasks, including remainder of briefing on motion for clarification.	0.6	0.6
6/29/2020	Email litigation team regarding email from Mr. Olsen re: planned enforcement.	0.3	0.3
7/2/2020	Telephone conference with Ms. Huppert re: drafting of reply brief.	0.7	0.7
7/2/2020	Review and analyze defendants' opposition; email litigation team and Ms. Huppert re: same.	1.3	1.3
7/3/2020	Review and analyze defendants' opposition; draft arguments for potential use in reply; email Ms. Huppert re: same.	4.1	4.1
7/3/2020	Analyze and review draft of potential argument for reply and email Ms. Huppert re: same.	0.6	0.6
7/4/2020	Research firm prediction rule and authority of federal court to interpret state law for reply brief.	2.9	2.9
7/5/2020	Review and revise draft of reply brief; email Ms. Huppert re: same.	4.5	4.5
7/6/2020	Review and revise draft of reply brief; email Ms. Huppert re: same.	1.3	1.3
7/6/2020	Telephone conference with Ms. Huppert re: revisions to reply brief.	0.5	0.5
7/6/2020	Draft agenda for weekly litigation call to discuss litigation updates and tasks.	0.3	0.3
7/6/2020	Telephone conference with litigation team to discuss litigation updates and tasks, including next steps after decision on pending motion for clarification.	0.6	0.6
7/7/2020	Review and revise draft of reply brief; email Ms. Huppert re: same.	1.1	1.1
7/7/2020	Telephone conference with Ms. Huppert re: revisions to reply brief.	0.2	0.2
7/8/2020	Telephone conference with Ms. Huppert re: oral argument on motion for clarification.	0.3	0.3
7/8/2020	Emails with Ms. Huppert and Ms. Cockerille re: oral argument on motion for clarification.	0.3	0.3
7/10/2020	Telephone conference with Ms. Huppert re: preparation for oral argument on motion for clarification.	0.5	0.5
7/13/2020	Draft agenda for weekly litigation call to discuss litigation updates and tasks.	0.2	0.2
7/13/2020	Telephone conference for weekly litigation call to discuss litigation updates and tasks, including preparation for moot.	0.2	0.2
7/20/2020	Review oral argument preparation materials from Ms. Huppert	1.8	1.8
7/20/2020	Prepare for moot with Ms. Huppert on motion for clarification regarding defendants' enforcement.	0.5	0.5
7/20/2020	Participate in moot with Ms. Huppert on motion for clarification regarding defendants' enforcement.	1.3	1.3
7/20/2020	Telephone conference with Ms. Huppert regarding preparation for hearing on motion for clarification regarding defendants' enforcement.	0.8	0.8
7/20/2020	Email Ms. Cockerille regarding hearing on motion for clarification regarding defendants' enforcement.	0.2	0.2
7/20/2020	Email with Covington team regarding hearing on motion for clarification regarding defendants' enforcement.	0.1	0.1
7/20/2020	Email with Ms. Huppert regarding hearing on motion for clarification regarding defendants' enforcement.	0.2	0.2
7/21/2020	Telephone conferences with Ms. Huppert re: hearing on motion for clarification.	0.3	0.3
7/21/2020	Email with litigation team re: changes to timing of hearing on motion for clarification.	0.2	0.2
7/21/2020	Email Ms. Huppert re: hearing on motion for clarification.	0.7	0.7
7/22/2020	Email Ms. Huppert re: hearing on motion for clarification.	0.3	0.3

7/22/2020	Review briefs in preparation for hearing on motion for clarification.	0.5	0.5
7/22/2020	Prepare for and attend hearing on motion for clarification.	1.5	1.5
7/22/2020	Telephone conference with Ms. Huppert re: hearing on motion for clarification.	0.2	0.2
7/22/2020	Telephone conference with Ms. Cockerille, Ms. Smith, and Mr. Lanosa re: hearing on motion for clarification.	0.3	0.3
7/22/2020	Email plaintiffs regarding hearing on motion for clarification.	0.3	0.3
7/27/2020	Review and revise first set of requests for production of documents.	0.9	0.9
7/27/2020	Email litigation team regarding weekly litigation tasks, including status of discovery requests.	0.3	0.3
7/27/2020	Review and respond to email from Ms. Ingelhart re: revisions to discovery requests.	0.2	0.2
7/28/2020	Telephone conference with Ms. Ingelhart re: discovery requests.	0.3	0.3
7/28/2020	Draft email to Mr. Lanosa regarding discovery requests.	0.5	0.5
7/31/2020	Telephone conference with Mr. Lanosa regarding revisions to discovery requests.	0.4	0.4
8/7/2020	Telephone conference with Ms. Huppert regarding responses to public records requests.	0.1	0.1
8/7/2020	Telephone conference with Ms. Huppert regarding order on motion for clarification.	0.2	0.2
8/7/2020	Review order on motion for clarification regarding defendants' enforcement plan.	0.6	0.6
8/7/2020	Emails with plaintiffs regarding order on motion for clarification.	0.6	0.6
8/9/2020	Research appealability of order granting clarification.	0.5	0.5
8/10/2020	Draft agenda for team call to discuss weekly litigation tasks.	0.2	0.2
8/10/2020	Telephone conference with litigation team to discuss weekly litigation tasks and status, including decision on motion for clarification.	0.9	0.9
8/10/2020	Draft and revise letter to Mr. Olsen re: compliance with injunction.	0.7	0.7
8/11/2020	Email Ms. Huppert, Ms. Ingelhart, and Ms. Farnsworth regarding defendants' compliance with injunction; review updated IDHW forms and compare with prior versions.	0.5	0.5
8/11/2020	Email with Ms. Cockerille and Covington team re: defendants' compliance with injunction.	0.3	0.3
8/11/2020	Email Mr. Olsen re: defendants' compliance with injunction.	0.1	0.1
8/12/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert re: potential expert testimony relevant to HB 509.	1	1
8/13/2020	Review edits to discovery requests from Ms. Ingelhart; email Ms. Ingelhart re: same.	0.5	0.5
8/13/2020	Telephone conference with Mr. Liu and Mr. Lanosa regarding discovery requests.	0.5	0.5
8/13/2020	Research regarding availability of discovery to oppose Rule 60(b)(5) motion and email Mr. Liu and Mr. Lanosa regarding same.	0.7	0.7
8/17/2020	Email litigation team regarding weekly team call to discuss timing of affirmative discovery.	0.1	0.1
8/17/2020	Analyze strategic considerations regarding timing of affirmative discovery.	0.4	0.4
8/17/2020	Telephone conference with litigation team to discuss timing of affirmative discovery.	0.9	0.9
8/17/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert regarding revisions to discovery requests.	0.3	0.3

8/17/2020	Email Mr. Olsen regarding telephone conference to discuss case status.	0.2	0.2
8/19/2020	Prepare for call with Mr. Olsen to discuss case status and next steps.	0.4	0.4
8/19/2020	Telephone conference with Mr. Olsen to discuss case status and next steps, including potential motion practice.	0.4	0.4
8/19/2020	Telephone conference with Ms. Huppert regarding telephone conference with Mr. Olsen to discuss case status and next steps, including potential motion practice.	0.3	0.3
8/19/2020	Email litigation team with summary and analysis of telephone conference with Mr. Olsen to discuss case status and next steps, including potential motion practice.	0.4	0.4
8/24/2020	Email Mr. Liu and litigation team regarding next steps regarding discovery and potential further confirmatory email with Mr. Olsen.	0.5	0.5
8/24/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks, including status of potential discovery.	0.3	0.3
8/24/2020	Email litigation team re: potential confirmatory email with Mr. Olsen following team call.	0.1	0.1
8/24/2020	Email Ms. Ingelhart regarding potential timing of defendant's forthcoming motion and status of potential expert.	0.2	0.2
11/30/2020	Draft email to Mr. Olsen regarding further stipulation on timing of fees motion.	0.4	0.4
11/30/2020	Draft email to litigation team regarding further stipulation on timing of fees motion.	0.3	0.3
11/30/2020	Respond to emails from Mr. Liu regarding options for further stipulation on timing of fees motion.	0.5	0.5
11/30/2020	Email Ms. Huppert regarding preparation for stipulation and order on timing of fees motion.	0.2	0.2
12/2/2020	Review and revise stipulation and order on timing of fees motion and email Ms. Huppert re: same.	0.7	0.7
12/14/2020	Review draft of expert testimony related materials potentially needed in litigation from Ms. Ingelhart.	0.5	0.5
12/14/2020	Email Ms. Ingelhart regarding draft of expert testimony related materials potentially needed in litigation and next steps.	0.4	0.4
12/14/2020	Telephone conference with litigation team re: expert testimony related materials potentially needed in litigation and next steps.	0.6	0.6
12/14/2020	Email litigation team re: follow-up Pavan research after team call.	0.1	0.1
2/8/2021	Compare current IDHW birth certificate gender marker change forms to prior iterations of same, and email litigation team regarding step to seek corrective action for further violations of the injunction.	1.5	1.5
2/9/2021	Emails with Ms. Cockerille, Ms. Ingelhart, and Covington team regarding corrective action for further violations of the injunction.	0.8	0.8
2/9/2021	Review and review draft letter to Mr. Olsen regarding corrective action for further violations of the injunction.	0.9	0.9
3/29/2021	Email plaintiffs update regarding case status and potential dissolution motion.	0.5	0.5
4/22/2021	Email Ms. Huppert and Ms. Ingelhart re: defendant's plans with respect to potential dissolution motion and outstanding issues related to fees.	0.3	0.3
4/23/2021	Email Ms. Smith re: defendant's plans with respect to potential dissolution motion and outstanding issues related to fees.	0.3	0.3
5/18/2021	Telephone conference with Ms. Huppert regarding strategy and task list for seeking attorneys' fees and costs.	0.8	0.8
5/27/2021	Telephone conference with Ms. Huppert regarding motion for attorneys' fees and costs.	0.3	0.3
6/2/2021	Analyze attorneys' fees issues raised by Ms. Huppert and email Ms. Huppert in response to same.	0.9	0.9
6/9/2021	Telephone conference with litigation team to discuss strategy re: attorneys' fees.	0.6	0.6
6/9/2021	Telephone conference with Ms. Smith re: client engagement letters for Hawley.	0.2	0

6/11/2021	Telephone conference with Ms. Huppert re: tasks and division of labor on fees motion.	1	1
6/11/2021	Email Los Angeles civil rights practitioner regarding potential declaration to validate local market rates.	0.3	0.3
6/11/2021	Conference with Los Angeles civil rights practitioner regarding potential declaration to validate local market rates.	0.3	0.3
6/12/2021	Research potential attorneys to validate Los Angeles rates.	0.5	0.5
6/12/2021	Email Ms. Huppert status of potential candidates to validate Los Angeles rates.	0.3	0.3
6/12/2021	Email Ms. Pizer regarding outreach to potential candidate to validate Los Angeles rates.	0.5	0.5
6/12/2021	Email Ms. Ingelhart regarding potential attorneys to validate Chicago rates.	0.4	0.4
6/14/2021	Email with Ms. Pizer regarding outreach to potential candidate to validate Los Angeles rates.	0.6	0.6
6/14/2021	Email with Ms. Huppert regarding time entries from Covington attorneys.	0.2	0.2
6/15/2021	Telephone conference with F.V. regarding case status update.	0.4	0.4
6/15/2021	Telephone conference with Ms. Huppert regarding revisions to stipulation and order on fees and costs.	0.4	0.4
6/15/2021	Revise stipulation and order on fees and costs and email Ms. Smith re: same.	0.4	0.4
6/16/2021	Telephone conference with Ms. Huppert regarding attorneys' fees and research assignments.	0.7	0.7
6/17/2021	Email with Ms. Cockerille regarding local attorney to validate forum rates in support of fees motion.	0.5	0.5
6/21/2021	Email with Ms. Cockerille regarding local attorney to validate forum rates in support of fees motion.	0.3	0.3
6/21/2021	Review exemplars of prior declarations from Mr. Stormer validating local rates.	0.5	0.5
6/22/2021	Email with Ms. Smith regarding stipulation and order on fees extension.	0.3	0.3
6/22/2021	Draft Stormer declaration based on information and materials provided by Mr. Stormer.	1.5	1.5
6/23/2021	Draft Stormer declaration based on information and materials provided by Mr. Stormer.	2.5	2.5
7/9/2021	Telephone conference with Ms. Huppert to discuss strategy and tasks re: seeking attorneys' fees.	0.3	0.3
7/9/2021	Telephone conference with litigation team to discuss strategy and tasks re: seeking attorneys' fees.	0.5	0.5
7/9/2021	Select relevant case law, declarations, and related materials to send to Ms. Smith to determine appropriate local rates for fees and email Ms. Smith re: same.	0.9	0.9
7/23/2021	Telephone conference with Ms. Huppert to discuss status of components for fees motion and potential negotiation with opposing counsel re: fees.	0.3	0.3
8/3/2021	Email Ms. Ingelhart regarding case law on hourly rates in Chicago.	0.3	0.3
8/3/2021	Review and revise draft letter regarding attorneys' fees to defendants.	1.8	1.8
8/4/2021	Telephone conference with Ms. Huppert to discuss revisions to draft letter regarding attorneys' fees to defendants.	1.2	0.6
8/4/2021	Review and revise further version of draft letter regarding attorneys' fees to defendants.	2.5	2.5
8/9/2021	Review and revise further version of draft letter regarding attorneys' fees to defendants, and email Ms. Huppert re: same.	0.6	0.6
8/30/2021	Email with Ms. Huppert regarding task list and internal schedule for fees motion.	0.3	0.3
8/30/2021	Telephone conference with litigation team to discuss state's counter-offer on fees and preparation of fees motion and supporting components.	1	1
8/30/2021	Finalize draft of declaration for Mr. Stormer to validate Los Angeles rates.	0.9	0.9

8/30/2021	Email Mr. Stormer regarding declaration to validate Los Angeles rates.	0.4	0.4
8/31/2021	Email with Ms. Huppert, Ms. Ingelhart, Ms. Smith, and Ms. Cockerille regarding declarations to validate rates in Boise and Chicago.	0.2	0.2
8/31/2021	Email with Mr. Lanosa regarding supporting factual information needed for fees motion.	0.2	0.2
9/1/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	3.6	3.6
9/1/2021	Review exemplars of relevant attorney declarations in support of fees motion for preparation of Renn declaration in support of fees motion.	0.7	0.7
9/2/2021	Email with Ms. Smith and Ms. Cockerille regarding declaration to validate Boise rates.	0.2	0.2
9/2/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	2.5	2.5
9/3/2021	Telephone conference with Ms. Huppert regarding rebuttal regarding points raised by Mr. Olsen's correspondence regarding attorneys' fees and responses to same.	0.6	0.6
9/3/2021	Draft summary of rebuttal regarding points raised by Mr. Olsen's correspondence regarding attorneys' fees and email same to Ms. Huppert.	0.8	0.8
9/3/2021	Telephone conference with Ms. Huppert regarding conversation with Mr. Olsen regarding attorneys' fees and next steps on motion.	0.2	0.2
9/3/2021	Email with Covington team regarding streamlining timekeepers for whom fees are sought based on correspondence from Mr. Olsen.	0.2	0.2
9/7/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	6.2	6.2
9/9/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	1.5	0
9/10/2021	Conduct legal research for attorneys' fees motion.	1.9	0
9/10/2021	Telephone conference with Ms. Ingelhart regarding declaration of Mr. Wysong.	0.7	0
9/10/2021	Telephone conference with Ms. Huppert regarding attorneys' fees motion and supporting declarations.	2	0
9/11/2021	Review and revise draft of Lloyd declaration regarding Boise hourly rates.	1.8	0.9
9/13/2021	Review and comment on draft outline of fees motion.	2.2	1.1
9/14/2021	Review and revise draft of Wysong declaration regarding Chicago rates; conduct research for same.	6.5	3
9/15/2021	Telephone conference with Ms. Ingelhart regarding Wysong declaration regarding Chicago rates.	0.5	0
9/16/2021	Draft Renn declaration in support of fees motion.	6	6
9/17/2021	Review draft of motion for attorneys' fees	0.8	0.8
9/17/2021	Email with Ms. Smith regarding revisions to declaration of Mr. Lloyd.	0.2	0.2
9/17/2021	Email with Ms. Ingelhart regarding revisions to declaration of Mr. Wysong.	0.1	0.1
9/17/2021	Telephone conference with Ms. Huppert regarding draft of motion for attorneys' fees.	0.6	0.6
9/17/2021	Revise draft of motion for attorneys' fees.	1.4	1.4
9/18/2021	Revise draft of motion for attorneys' fees.	1.3	1.3
9/19/2021	Revise draft of motion for attorneys' fees.	2.1	2.1
9/20/2021	Revise draft of motion for attorneys' fees and analyze case law cited in draft.	8.6	6
9/21/2021	Revise draft of motion for attorneys' fees.	9.1	6

9/22/2021	Revise draft of motion for attorneys' fees.	7.7	6
9/22/2021	Draft Renn declaration in support of fees motion.	0.9	0
9/22/2021	Email with Ms. Ingelhart regarding Chicago rates and Wysong declaration.	0.3	0.3
9/22/2021	Email plaintiffs re: case status update.	0.2	0.2
9/23/2021	Draft Renn declaration in support of fees motion.	2.5	2.5
9/24/2021	Review and approve all time entries for submission with fees motion, including to exercise billing judgment over same.	1.8	1.8
9/26/2021	Review and approve time entries for submission with fees motion, including to exercise billing judgment over same.	2.5	0

Total: 396.6

2020 Hours 312

2021 Hours 84.6

Hours for Plaintiff's First Motion To Clarify: 145.1

Fees for Plaintiff's First Motion To Clarify \$94,315.00

Total Time Minus Time on First Motion To Clarify 251.5

2020 Hours 166.9

2021 Hours 84.6

F.V. v. Jeppesen Time Sheet for Attorney Nora Huppert			
Date	Description	Time Spent	Time Billed
3/20/2020	Telephone conference with Mr. Renn, Ms. Ingelhart, and Ms. Cockerille to discuss litigation tasks.	1	1
3/23/2020	Telephone conference with Mr. Renn, Ms. Ingelhart, and Ms. Cockerille to discuss tasks to prepare for litigation.	1.4	1.4
3/30/2020	Telephone conference with Mr. Renn, Ms. Ingelhart, and Ms. Cockerille to discuss tasks to prepare for litigation.	1	1
3/31/2020	telephone call with Mr. Renn to discuss dissolution research	0.3	0.3
3/31/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	2.8	2.8
4/1/2020	Telephone call with Mr. Renn to discuss research on 509	0.7	0.7
4/1/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	2.7	2.7
4/3/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	2.4	2.4
4/5/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	5	5
4/6/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	1.2	1.2
4/6/2020	Litigation team telephone meeting with Ms. Ingelhart, Mr. Renn, and Ms. Cockerille	1	1
4/6/2020	Telephone meeting with individual potentially harmed by HB 509, J-W	1	1

4/8/2020	Research into whether the re-enactment of an unconstitutional state law can ever justify dissolution under Rule 60(b)(5)	4.3	4.3
4/10/2020	Telephone call with Mr. Renn to discuss clarification research	0.5	0.5
4/10/2020	Weekly litigation team conference to discuss motion for clarification and division of labor	1	1
4/15/2020	Telephone call with individual potentially harmed by HB 509, Ms. B	1.3	1.3
4/17/2020	Litigation team conference to discuss division of labor regarding clarification research	0.9	0.9
4/23/2020	Conduct research into specific legal standard under Rule 60(b)(5)	1	1
4/27/2020	Telephone call with Mr. Renn to discuss dissolution research, potential opposition	0.4	0.4
4/29/2020	Conduct research into specific legal standard under Rule 60(b)(5)	3.6	3.6
5/4/2020	Research related to reply on motion for clarification, ripeness issues specifically	4.3	4.3
5/5/2020	Research related to reply on motion for clarification, ripeness issues specifically	6.4	6.4
5/5/2020	Outreach to people impacted by HB 509.	0.7	0.7
5/7/2020	Interview with impacted person D.B.	0.9	0.9
5/7/2020	reviewing PR's draft reply clarification	0.5	0.5
5/9/2020	Research for reply on clarification motion to rebut defendant's cited case law.	6.3	6.3
5/10/2020	Research related to reply on motion for clarification	6.1	6.1
5/11/2020	Telephone call with Mr. Renn and Ms. Ingelhart to discuss call with potential plaintiff KC	0.4	0.4
5/11/2020	Conference with litigation team to discuss motion for clarification, including moot for upcoming hearing.	0.9	0.9
5/11/2020	Call with impacted person K.C.	0.9	0.9
5/12/2020	Drafting public records requests	3	3
5/14/2020	research into inherent retention of jurisdiction to interpret injunction	4.8	4.8
5/15/2020	Drafting public records requests	3.9	3.9
5/15/2020	Moot for Peter Renn on oral argument on motion for clarification	1.2	1.2
5/19/2020	May 19th hearing on motion for clarification and team debrief	3	3
5/20/2020	Finalizing and transmitting public records requests	1.3	1.3
5/26/2020	Conference with litigation team to discuss clarification motion and fact issues related to challenging HB 509	1.1	1.1
5/29/2020	Telephone call with Mr. Renn and Ms. Ingelhart following up on call with Mr. Olsen re: public records requests	0.6	0.6
5/29/2020	Telephone call with Steve Olsen re: records request	0.6	0.6
6/1/2020	Litigation team conference to discuss tasks and division of labor, potential further avenues to prevent enforcement of HB 509.	0.9	0.9
6/1/2020	Review and analyze Order on Motion for Clarification	0.9	0.9
6/8/2020	Litigation team conference to discuss status and analyze decision on motion for clarification	0.8	0.8
6/9/2020	Prepare email to Steve Olsen regarding stipulation and proposed order to extend time to file a fees motion	0.4	0.4

6/9/2020	Prepare stipulation and proposed order to extend time on fees motion	1.4	1.4
6/17/2020	Telephone update with impacted individual K.C.	0.6	0.6
6/19/2020	Received and conducted preliminary review of public records in response to public records request re: HB509	1.5	1.5
6/20/2020	Telephone call with Mr. Renn re: public records request and potential second motion for clarification	0.7	0.7
6/22/2020	Further research related to reply on motion for clarification	0.4	0.4
6/22/2020	Litigation team conference to discuss public records and motion for clarification	0.4	0.4
6/24/2020	Conference with Mr. Renn and Ms. Ingelhart with J.H., re: potential expert testimony on justifications in opposition to potential motion for dissolution	1	1
6/24/2020	Call with impacted person P.R.	0.8	0.8
6/25/2020	Conducting comprehensive review of public records in response to public records request re: HB509	1.5	1.5
7/1/2020	Drafting reply to opposition to second motion for clarification	3	3
7/2/2020	Telephone conference with Mr. Renn to discuss strategy regarding reply to opposition to second motion for clarification	0.8	0.8
7/2/2020	Drafting reply to opposition to second motion for clarification	1.9	1.9
7/3/2020	Drafting reply to opposition to second motion for clarification	12.5	12.5
7/4/2020	Drafting reply to opposition to second motion for clarification	12.8	12.8
7/5/2020	Drafting reply to opposition to second motion for clarification	11.7	11.7
7/6/2020	Litigation team conference to discuss status and discuss upcoming decision on second motion for clarification, possible strategic responses.	0.9	0.9
7/7/2020	Drafting reply to opposition to second motion for clarification	7.1	7.1
7/8/2020	Email correspondence arranging a time for hearing on second motion for clarification	1.1	0.1
7/10/2020	Call with Mr. Renn re: prep oral argument on 2nd motion for clarification	0.5	0.5
7/10/2020	Conducting comprehensive review of public records in response to public records request re: HB509	2.9	2.9
7/13/2020	Litigation team conference to discuss tasks and division of labor including moot in advance of upcoming hearing on second motion for clarification	0.4	0.4
7/15/2020	Conducting comprehensive review of public records in response to public records request re: HB509	2.9	2.9
7/17/2020	Preparing for hearing on second motion for clarification	12.9	12.9
7/18/2020	Preparing for hearing on second motion for clarification	11	11
7/19/2020	Preparing for hearing on second motion for clarification	9.1	9.1
7/20/2020	Preparing for hearing on second motion for clarification	8.1	8.1
7/20/2020	Mooting hearing on second motion for clarification	1.4	1.4
7/22/2020	Hearing on second motion for clarification and team debrief	2.2	2.2
8/7/2020	Call with Mr. Renn re: public records requests	0.1	0.1
8/7/2020	Call with Mr. Renn re: order on 2nd motion for clarification	0.2	0.2
8/10/2020	Litigation team conference to discuss decision on second motion for clarification, tasks and division of labor in response	0.9	0.9

8/12/2020	Telephone meeting with Ms. Ingelhart and Mr. Renn regarding potential expert testimony	1	1
8/17/2020	Telephone call with Mr. Renn and Ms. Ingelhart regarding discovery requests	0.3	0.3
8/19/2020	Telephone call with Mr. Renn regarding phone call with Mr. Olsen	0.3	0.3
8/24/2020	Litigation team conference to discuss potential discovery issues	0.3	0.3
5/18/2021	Telephone call with Mr. Renn regarding attorneys fee stipulation and deadline, potential motion for fees and costs	0.8	0.8
6/9/2021	Telephone call with litigation team re: recovering attorneys' fees	0.6	0.6
6/11/2021	Phone conference with Mr. Renn to discuss drafting and research of declarations in support of motion for attorneys' fees	1	1
6/18/2021	Analyze intern research regarding legal issues in motion for attorneys' fees	0.4	0.4
6/21/2021	Collating time entries for fees motion	2.9	1.5
6/22/2021	Research for fees motion	4.6	4.6
7/9/2021	Phone call with Mr. Renn to discuss motion for attorneys' fees tasks	0.3	0.3
7/9/2021	Litigation team conference to discuss upcoming tasks related to motion for attorneys' fees and division of labor	0.5	0.5
7/14/2021	Research related to motion for attorney's fees, out-of-forum rates	3.4	3.4
7/19/2021	Research related to motion for attorney's fees, out-of-forum rates	6	6
7/22/2021	Organizing time entries for fees motion	1.8	0.9
7/23/2021	Phone call with Mr. Renn to discuss fees motion research and potential negotiation	0.3	0.3
7/26/2021	Research and drafting attorneys' fees motion	2.7	2.7
7/27/2021	Collating time entries for fees motion	3.3	1.7
7/28/2021	Drafting letter to opposing counsel re: negotiating attorneys' fees	2.8	2.8
7/29/2021	Drafting letter to opposing counsel re: negotiating attorneys' fees	2.9	2.9
8/4/2021	Revising letter to opposing counsel re: negotiating attorney's fees	3.6	3.6
8/4/2021	Telephone call with Mr. Renn regarding revisions to letter Defendants regarding attorneys' fees	1.2	0.6
8/8/2021	Finalizing draft of letter to Defendants regarding attorneys' fees	0.3	0.3
8/9/2021	Transmitting letter to Defendants' regarding attorneys' fees and potential negotiation as to fees	0.2	0.2
8/25/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.1	0.1
8/30/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.1	0.1
8/30/2021	Telephone conference with litigation team regarding upcoming division of labor re: motion for attorneys' fees	1	1
8/30/2021	Litigation team conference to discuss state's response to proposed settlement of fees and further preparation of attorneys' fees motion	1	1
8/31/2021	Email with Mr. Renn and Ms. Ingelhart regarding Stormer Declaration	0.1	0.1
9/1/2021	Email with Mr. Renn regarding collection of time entries for attorneys' fee motion	0.1	0.1
9/2/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.1	0.1

9/3/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.2	0.2
9/3/2021	Telephone meeting with Mr. Renn regarding upcoming telephone call with Mr. Olsen regarding attorneys' fees letter	0.6	0.6
9/3/2021	Telephone meeting with Mr. Renn regarding second telephone conversation with Mr. Olsen regarding attorneys' fees and next steps on motion.	0.2	0.2
9/8/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.1	0.1
9/9/2021	Collating and organizing time	1.2	0.6
9/9/2021	Email team regarding time for attorneys' fees motion	0.1	0.1
9/10/2021	Telephone meeting with Mr. Renn regarding briefing for upcoming attorneys' fees motion	2	0
9/12/2021	Drafting memorandum of law in support of attorneys' fees motion	11.5	9
9/13/2021	Drafting memorandum of law in support of attorneys' fees motion	15	9
9/14/2021	Drafting memorandum of law in support of attorneys' fees motion	13.8	9
9/15/2021	Drafting memorandum of law in support of attorneys' fees motion	14	9
9/17/2021	Telephone call with Mr. Renn to discuss filing tasks re: Motion for Attorney's Fees	0.6	0.6
9/22/2021	Revising memorandum of law in support of attorneys' fees motion	1.2	1.2
9/22/2021	Organizing and preparing litigation team's time for submission with attorneys' fees motion	3.2	1.6
9/24/2021	Further review, organizing, and preparing of litigation team time in preparation for filing	1.2	0.6
9/26/2021	Review draft of Renn declaration in support offers motion	1.3	0.6
9/27/2021	Further review, organizing, and preparing of litigation team time in preparation for filing	1.6	0.8

Total:	277.8
2020 Hours	197
2021 Hours	80.8
Hours for Plaintiff's First Motion To Clarify:	33.9
Fees for Plaintiff's First Motion To Clarify	\$11,017.50
Total Time Minus Time on First Motion To Clarify	243.9
2020 Hours	163.1
2021 Hours	80.8

F.V. v. Jeppesen Time Sheet for Attorney Kara Ingelhart			
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Date	Description	Time Spent	Time Billed
3/19/2020	Communication with individuals and organizations impacted by HB509.	1	1
3/20/2020	Telephone conference with Nora Huppert and Peter Renn re tasks to prepare for potential litigation.	1	1
3/23/2020	Telephone conference with F.V. litigation team to discuss initial litigation tasks.	1.4	1.4
3/24/2020	Communication with individuals and organizations impacted by HB509.	1	1
3/25/2020	Scheduling meeting with individual impacted by HB 509 EJ; Telephone conference with EJ.	2	2
3/26/2020	Email update to F.V. litigation team; Email communication with AC re other potential expert witnesses; follow-up communication with impacted individual EJ.	0.5	0.5
3/27/2020	Email update to F.V. litigation team regarding communication with persons impacted by HB 509 and I potential experts.	0.3	0.3
3/30/2020	Telephone conference with F.V. litigation team re: litigation tasks.	1	1
3/30/2020	Telephone call with potential expert AC.	0.5	0.5
3/30/2020	Research persons and organizations impacted by HB509.	1.5	1.5
3/31/2020	Follow-up with co-counsel MC, potential expert AC, HB509-impacted individual OJW; research persons and orgs impacted by HB509.	3.2	3.2
4/1/2020	Telephone conference w Peter Renn re: statutory interpretation of HB509 and dissolution motion	0.4	0.4
4/1/2020	Email correspondence with organization in potential contact with impacted persons; Review Lambda help desk inquiries regarding HB 509.	2.5	2.5
4/2/2020	Email correspondence with and research regarding correspondence with organization in potential contact with impacted persons	2	2
4/3/2020	Email correspondence with persons and organizations impacted by HB509.	0.6	0.6
4/6/2020	Telephone conference with Mr. Renn, Ms. Huppert, and Ms. Cockerille re: HB509 litigation tasks.	1.5	1.5
4/6/2020	Telephone conference with individual impacted by HB509 OJW.	1	1
4/6/2020	Telephone conference with Mr. Renn and Ms. Huppert re: communication with OJW.	0.3	0.3
4/6/2020	Draft interview questions for HB509-impacted individuals and organizations.	1	1
4/6/2020	Review Lambda Legal help desk intakes regarding HB509.	1	1
4/7/2020	Telephone conference with Mr. Renn re: potential Covington co-counsel	0.3	0
4/7/2020	Telephone conference with potential Covington co-counsel.	0.7	0
4/8/2020	Telephone conference with potential Covington co-counsel.	0.3	0
4/9/2020	Telephone conference with potential experts AC and NAPHSIS.	1	1
4/9/2020	Email update to F.V. litigation team re communication with potential experts.	0.2	0.2
4/9/2020	Review HB509 legislative justifications	0.5	0.5
4/10/2020	Responsive email to co-counsel Covington	0.2	0
4/10/2020	Email correspondence follow-up with Help Desk attorney re HB509 inquiries	0.3	0.3
4/10/2020	HB509 legislative justifications research	0.8	0.8

4/10/2020	Assemble documents for co-counsel Covington	0.2	0
4/10/2020	Telephone conference with litigation team regarding HB509 litigation tasks.	0.5	0
4/13/2020	Telephone conference with HB509-impacted person LB.	1	1
4/14/2020	Follow-up emails to retainer communications with clients; scheduling follow-up communication with LB over emails	0.3	0.3
4/14/2020	Review draft motion for clarification.	0.7	0.7
4/14/2020	Telephone conference with client F.V. re retainer.	0.3	0
4/15/2020	Research re potential expert witness.	0.7	0.7
4/15/2020	Telephone conference with LB and Peter Renn	1.3	1.3
4/15/2020	Research re potential expert witness.	0.7	0.7
4/17/2020	Email correspondence with Covington co-counsel sharing related Tennessee matter public filings and short summary.	0.1	0
4/17/2020	Weekly litigation call to discuss litigation tasks, status, and division of labor.	0.9	0.9
4/23/2020	Email correspondence with Mr. Renn re HB 509 justifications	0.2	0.2
4/24/2020	Draft case proof chart.	2.5	2.5
4/27/2020	Attend weekly litigation team meeting regarding litigation tasks and status	1	1
4/27/2020	Research re HB 509 legislative justification and potential expert witness	1.5	1.5
4/27/2020	Telephone conference with Peter Renn re HB509-impacted individuals.	0.2	0.2
4/29/2020	Telephone conference with HB509-impacted person OJW.	0.8	0.8
4/29/2020	Telephone conference with HB509-impacted person LB.	0.8	0.8
4/30/2020	Telephone conference with HB509-impacted person LB.	1	1
5/1/2020	Telephone conference with HB509-impacted person OJW.	0.5	0.5
5/4/2020	Telephone conference with HB509-impacted person OJW.	0.5	0.5
5/5/2020	Email correspondence with HB-509 impacted individuals.	0.5	0.5
5/6/2020	Email correspondence with HB-509 impacted individuals.	0.2	0.2
5/7/2020	Telephone conference with HB509-impacted person DB.	1	1
5/7/2020	Telephone conference with HB509-impacted person DS.	1	1
5/7/2020	Email with Mr. Renn re HB509-impacted individuals' facts	0.2	0.2
5/8/2020	Review reply brief in support of motion for clarification.	1	1
5/8/2020	Email correspondence with Nora Huppert and Peter Renn re HB509-impacted individuals.	0.5	0.5
5/11/2020	Attend weekly litigation team meeting regarding litigation tasks and status	1.1	1.1
5/11/2020	Telephone conference with Peter Renn and Nora Huppert re HB509-impacted individual	0.4	0.4
5/11/2020	Schedule follow-up meeting with potential expert NAPHSIS follow-up and related potential expert research	0.7	0.7

5/11/2020	Telephone conference with Nora Huppert and HB509-impacted person K.	1	1
5/12/2020	Review Lambda Legal help desk intakes regarding HB509.	0.2	0.2
5/12/2020	Telephone conference with HB509-impacted individual EJ.	0.8	0.8
5/12/2020	Potential expert NAPHSIS summary draft for litigation team	0.5	0.5
5/15/2020	Participate in moot on motion for clarification	1.5	1.5
5/15/2020	Prepare to participate in moot on motion for clarification.	1.2	1.2
5/18/2020	Telephone conference with litigation team to discuss weekly tasks	1	1
5/18/2020	Follow-up email correspondence with potential expert NAPHSIS.	0.2	0.2
5/19/2020	Attend hearing on motion for clarification.	2	2
5/20/2020	Email communication with HB509-impacted individuals and organizations.	0.5	0.5
5/21/2020	Email correspondence to HB509-impacted person LB.	0.2	0.2
5/21/2020	Email correspondence to HB509-impacted person LG.	0.1	0.1
5/22/2020	Telephone conference with LG from HB509-impacted organization ID PFLAG.	1.5	1.5
5/26/2020	Telephone conference with potential expert JS.	1	1
5/26/2020	Attend weekly litigation team meeting regarding litigation tasks and status	1.1	1.1
5/26/2020	Telephone conference with potential expert SW.	1	1
5/26/2020	Research re potential expert witness.	1.4	1.4
5/29/2020	Research re potential expert witness.	0.9	0.9
5/29/2020	Telephone conference with Steve Olsen re records request.	0.4	0.4
5/29/2020	Telephone conference with Peter Renn and Nora Huppert re conference with SO re records request.	0.6	0.6
6/1/2020	Research re potential expert witness.	1.7	1.7
6/1/2020	Weekly litigation call to discuss tasks, status, and division of labor.	1	1
6/1/2020	Telephone conference with potential expert CMW	0.5	0.5
6/1/2020	Review order on Motion for Clarification	0.5	0.5
6/2/2020	Telephone conference with HB509-impacted person LB.	0.3	0.3
6/2/2020	Telephone conference with HB509-impacted organization OUPD.	0.5	0.5
6/4/2020	Email correspondence with HB-509 impacted organization Moscow PFLAG	0.2	0.2
6/8/2020	Weekly litigation call to discuss tasks, status, and division of labor.	1	1
6/8/2020	Telephone conference with Peter Renn re potential expert and research.		0
6/10/2020	Email correspondence with potential expert JH.	0.2	0.2
6/12/2020	Research re potential expert witness.	1	1

6/15/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	0.4	0.4
6/15/2020	Email correspondence with potential expert JH.	0.1	0.1
6/16/2020	Email correspondence with potential expert GS.	0.3	0.3
6/18/2020	Review Lambda Legal help desk intakes regarding HB509.	0.2	0.2
6/19/2020	Email correspondence with Peter Renn and Nora Huppert re public records request.	0.2	0.2
6/22/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	1	1
6/22/2020	Review motion regarding Defendants' enforcement of HB509 plan.	0.7	0.7
6/23/2020	Telephone conference with Peter Renn re potential expert and research.	0.5	0.5
6/24/2020	Telephone conference with Peter Renn re oral argument and motion for clarification.	0.2	0.2
6/25/2020	Preparation for meeting with potential expert JH.	0.5	0.5
6/26/2020	Telephone conference with potential expert JH.	1	1
6/26/2020	Telephone conference with Peter Renn re potential expert JH.	0.4	0.4
6/26/2020	Draft of brief in opposition to expected motion to dissolve F.V. permanent injunction.	1.5	1
6/29/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	0.5	0.5
6/29/2020	Email correspondence with Peter Renn re potential expert JH.	0.2	0.2
6/29/2020	Email correspondence with potential expert SL.	0.3	0.3
7/6/2020	Review reply in support of motion regarding Defendants' enforcement of HB509 plan.	0.5	0.5
7/6/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	1	1
7/6/2020	Telephone conference with potential expert SL.	0.5	0.5
7/7/2020	Email correspondence with potential expert BD.	0.5	0.5
7/8/2020	Research re potential expert witness.	0.5	0.5
7/13/2020	Telephone conference with potential expert BD.	0.2	0.2
7/16/2020	Telephone conference with potential expert BD.	0.5	0.5
7/22/2020	Attend hearing on motion for clarification.	1.5	1.5
7/22/2020	Review litigation team email correspondence re hearing on motion for clarification.	0.5	0.5
7/27/2020	Review drafted RFPs and share edits in email correspondence with Peter Renn and Nora Huppert	0.8	0.8
7/28/2020	Telephone conference with Peter Renn re RFPs.	0.3	0.3
8/10/2020	Weekly litigation team meeting.	1	1
8/10/2020	Email correspondence with potential expert BD.	0.2	0.2
8/12/2020	Telephone conference with Peter Renn and Nora Huppert re potential expert.	1	1
8/12/2020	Research re potential expert witness.	0.5	0.5

8/13/2020	Edit RFPs and email correspondence to Nora Huppert and Peter Renn re same.	0.3	0.3
8/13/2020	Research regarding existing ID code/regulations re amendments to BCs.	0.3	0.3
8/13/2020	Draft definitions for RFPs.	0.5	0.5
8/17/2020	Weekly litigation team meeting.	0.9	0.9
8/17/2020	Telephone conference with Nora Huppert and Peter Renn re RFPs.	0.3	0.3
10/13/2020	Draft issues for potential expert report and supporting documents.	0.2	0
10/16/2020	Draft issues for potential expert report and supporting documents.	3	1.5
12/14/2020	Draft issues for potential expert report and supporting documents and email correspondence with Nora Huppert and Peter Renn re same.	4	2
2/9/2021	Review draft letter to Steve Olsen re violations of injunction.	0.2	0.2
3/3/2021	Email correspondence to NCTE update website regarding decision to advise public.	0.2	0
6/9/2021	Attend portion of litigation team meeting re fees.	0.3	0.3
6/14/2021	Email outreach to Chicago civil rights litigator colleagues re hourly rates.	1	1
7/9/2021	Litigation team call re fee motion	0.5	0.5
7/15/2021	Review Chicago rate fee research.	1	1
8/2/2021	Review Chicago rate fee research.	1	1
8/3/2021	Research re Chicago civil rights attorney hourly rates.	0.5	0.5
8/30/2021	Litigation team call re fee counter and motion	1	1
8/31/2021	Email correspondence with Chicago rate validator Charlie Wysong.	0.2	0.2
8/31/2021	Email correspondence with Peter Renn and Nora Huppert re Chicago rate validator.	0.2	0.2
9/2/2021	Telephone conference with Chicago attorney Charlie Wysong re declaration.	0.2	0.2
9/2/2021	Draft Wysong declaration.	0.5	0.5
9/3/2021	Draft Wysong declaration.	0.5	0.5
9/7/2021	Review email summary re Nora Huppert and Steve Olsen telephone conference regarding fees and respond re same.	0.2	0.2
9/8/2021	Draft Wysong declaration.	1.5	1.5
9/9/2021	Draft Wysong declaration.	1.5	1.5
9/10/2021	Telephone conference with Peter Renn re Wysong declaration.	0.7	0
9/10/2021	Telephone conference with Charlie Wysong re: declaration	0.1	0.1
9/10/2021	Draft Wysong declaration.	1	1
9/15/2021	Telephone conference with Peter Renn re Wysong declaration.	0.5	0.5
9/15/2021	Draft Wysong declaration.	0.7	0.7
9/16/2021	Email correspondence with Peter Renn and Nora Huppert re resumes/supporting documents for fee petition.	0.1	0.1

9/20/2021	Incorporate Nora Huppert and Peter Renn edits to Wysong declaration.	0.5	0.5
9/21/2021	Telephone conference with Charlie Wysong re declaration.	0.3	0.3
9/21/2021	Telephone conference with Peter Renn re Wysong declaration.	0.2	0
9/22/2021	Telephone conference with Charlie Wysong re declaration.	0.2	0.2
9/22/2021	Incorporate Charlie Wysong edits to declaration.	1	1
9/23/2021	Incorporate Peter Renn edits to Wysong declaration.	0.4	0.4
9/25/2021	Review draft motion for attorneys fees.	0.5	0

Total: 109.6

2020 Hours 94.5

2021 Hours 15.1

Hours for Plaintiff's First Motion To Clarify: 6.9

Fees for Plaintiff's First Motion To Clarify \$2,208.00

Total Time Minus Time on First Motion To Clarify 102.7

2020 Hours 87.6

2021 Hours 15.1

F.V. v. Jeppesen Time Sheet for Attorney Monica Cockerille			
Date	Description	Time Spent	Time Billed
3/23/2020	Call with Lambda team to discuss proposed legislation to overturn F.V. injunction and potential litigation	1	1
3/30/2020	Call with Lambda team to discuss proposed legislation to overturn F.V. injunction and potential litigation	1	1
4/6/2020	Review various emails in preparation for call to discuss passage of HB 509; telephone conference with Lambda team on next steps for drafting legal action	2.5	2.5
4/7/2020	Review of research on new complaint as a vehicle to challenge legislation to overturn F.V. injunction	1	1
4/8/2020	Email on public records request for HB 509	0.1	0.1
4/9/2020	Research on new complaint as vehicle to challenge legislation to overturn F.V. injunction	1.2	1.2
4/10/2020	Work on draft of potential new complaint to challenge HB 509	1.3	1.3
4/14/2020	Telephone conference with Peter Renn on motion to shorten time for clarification and other issues	0.2	0.2
4/15/2020	Review and revise motion to shorten time; review motion for clarification; review memorandum on clarification; email revisions to Peter Renn re: same	0.9	0.9
4/16/2020	Prepare final documents for filing; file same; further email on meet and confer on motion to shorten time	1	1
4/17/2020	Telephone conference with team to discuss status of motion for clarification and division of labor on other potential avenues re: HB 509	0.9	0.9

5/8/2020	Review reply to response on motion for clarification	1	1
5/11/2020	Telephone conference with Peter Renn regarding potential timing of filings in new action if required.	0.5	0.5
5/11/2020	Telephone conference to attend part of call with team regarding status of litigation tasks	0.1	0.1
5/15/2020	Telephone conference on mootng argument on motion for clarification	1.4	1.4
5/18/2020	Weekly telephone conference with team on litigation task status on challenging HB 509	1	1
5/19/2020	Court hearing on motion for clarification	2.1	2.1
6/1/2020	Telephone conference with team on status of litigation tasks in challenge to HB 509	1	1
6/15/2020	Weekly telephone call to discuss status of litigation tasks in challenge to HB 509	0.6	0.6
6/17/2020	Review letter to Steve Olsen regarding plan to enforce HB 509 and email on next steps; email replying to same	0.3	0.3
6/18/2020	Telephone conference with Peter Renn regarding notice to Defendants of request for status conference	0.2	0.2
6/22/2020	Review and revise briefing on second motion for clarification; telephone conference with team on status	1	1
6/29/2020	telephone conference with team to discuss status of second motion for clarification	0.6	0.6
7/20/2020	Telephone conference with team in preparation for hearing on second motion for clarification	1.3	1.3
7/22/2020	Court hearing on second motion for clarification	1.3	1.3
7/22/2020	Telephone conference with Peter Renn, Mr. Lanosa, and Ms. Smith re: hearing on motion	0.3	0.3
8/3/2020	Email on First Set of Requests for Production	0.1	0.1
8/7/2020	Email on Court's decision on second motion for clarification	0.1	0.1
8/10/2020	Telephone conference with team on Decision on Motion for Clarification and Discovery Requests in preparation to oppose Rule 60(b)(5) Motion	0.3	0.3
8/17/2020	Email on Discovery to oppose Rule 60(b)(5) Motion	0.1	0.1
9/9/2020	Email on F.V. deadline to appeal court's August 7th decision on clarification	0.2	0.2
12/14/2020	Review of Expert Report Discussed on 12/14 Call concerning opposition to Rule 60(b)(5) Motion	0.2	0.2
12/17/2020	Review of Birth Certificate Litigation Victory in Ohio	0.1	0.1
2/10/2021	Emails on the Violation of the Injunction by Idaho	0.1	0.1
2/14/2021	Emails on Demand Letter to Steven Olsen	0.1	0.1
2/24/2021	Emails on Response from Steve Olsen re: Demand Letter	0.2	0.2
3/3/2021	Emails on Withdrawal of Appearance in F.V. Matter re: Isaac Belfer	0.1	0.1
3/11/2021	Filing of Belfer Withdrawal	0.1	0.1
4/2/2021	Emails with Mr. Renn and others on defendants' non-compliance with injunction through February 2021	0.1	0.1
6/1/2021	Emails on Conflict Waiver re: Colleen Smith	0.1	0.1
6/9/2021	Telephone conference with team on attorneys' fees motion	0.5	0.5

6/14/2021	Various emails with team relating to fees motion, declarations as to Boise rates and other rates; reply to same; further email on time, email and contact for declaration for Boise rates	0.2	0.2
6/17/2021	Email with Nora Huppert re: declaration for Boise rates; Review and compile time entries and send to Nora	0.2	0.2
6/18/2021	Review and revise resume; send same to Nora Huppert for fees motion; telephone conference with Tom Lloyd re: declaration on Boise rates; email to Nora Huppert and Peter Renn re: same	0.4	0.4
7/23/2021	Review various emails regarding time entries and regarding July 9 call relating to time and declarations in support of fees	0.1	0.1
8/8/2021	Review various email with Steve Olsen and email from Peter and team relating to good faith effort to resolve fees motion with state; reply with comments on letter to Steve	0.2	0.2
8/30/2021	Telephone conference with litigation team to discuss government offer on fees and fees motion.	1	1
8/30/2021	email with Tom Lloyd on declaration in support of motion	0.1	0.1
9/2/2021	Review response from government to fees offer; further email with Colleen Smith re: Tom Lloyd declaration; further communication with Tom Lloyd; further email with Nora Huppert and team	0.2	0.2
9/9/2021	Email with Peter Renn and litigation team on response to government and thoughts on mediation; reply to same	0.1	0.1
9/16/2021	Email with Colleen Smith re: Tom Lloyd declaration; review and revise declaration and send comments to Colleen	0.3	0.3
9/23/2021	Review and revise memorandum in support of attorneys' fees motion	0.4	0.4
9/26/2021	Review Renn declaration in support of motion for fees; respond with comments and edits	0.3	0.3

Total: 29.7

2020 Hours 24.9

2021 Hours 4.8

Hours for Plaintiff's First Motion To Clarify: 7.5

Fees for Plaintiff's First Motion To Clarify \$3,075.00

Total Time Minus Time on First Motion To Clarify 22.2

2020 Hours 17.4

2021 Hours 4.8

F.V. v. Jeppesen Time Sheet for Attorney Colleen Smith			
Date	Description	Time Spent	Time Billed
4/7/2020	Email communications with Covington team regarding initial steps in HB 509 challenge.	0.1	0.1
4/8/2020	Draft engagement letters for potential new clients in Idaho HB 509 litigation.	2.4	0
4/9/2020	Draft and circulate email to team regarding draft engagement letter for potential new clients.	0.2	0
4/9/2020	Review email communications regarding scope of co-counsel agreement.	0.1	0
4/10/2020	Participate in Covington-Lambda Legal team meeting regarding overall litigation strategy.	1.1	1.1

4/10/2020	Email communications regarding Covington team litigation strategy meeting on HB 509 challenge.	0.1	0.1
4/10/2020	Review meeting agenda and prepare for Covington-Lambda Legal litigation strategy meeting.	0.2	0.2
4/10/2020	Review and analyze Idaho case law on requests for preliminary injunctions.	1	0
4/13/2020	Review and analyze Lambda Legal's notes on HB 509.	0.3	0.3
4/13/2020	Review and analyze Idaho Attorney General's letter regarding constitutionality of HB 509.	0.5	0.5
4/13/2020	Review and analyze Judgment and permanent injunction the Court entered in F.V. v. Barron.	0.3	0
4/13/2020	Draft and circulate summary to Henry Liu regarding background materials re: re: F.V. v. Barron and HB 509	0.5	0
4/14/2020	Meet with Henry Liu to discuss motion for clarification and next steps to assist with Idaho HB 509 challenge.	0.2	0.2
4/14/2020	Review motion for clarification, memorandum in support, and motion for abbreviated briefing schedule and draft comments regarding the same.	1.8	1.8
4/15/2020	Review and edit Henry Liu's comments on motion for clarification and circulate comments to Lambda Legal.	0.4	0.4
4/16/2020	Review and analyze interview notes from Lambda.	0.5	0
4/17/2020	Review audio and video files from House and Senate hearings on HB 509, draft list of relevant clips from each file, and submit request for creation of transcripts for relevant clips.	0.8	0.8
4/17/2020	Participate in team strategy meeting with Lambda Legal.	0.9	0.9
4/17/2020	Draft and circulate notes from meeting with Lambda Legal to Covington team.	0.5	0
4/17/2020	Review and analyze March 2, 2020 Senate State Affairs Committee meeting on alternative to HB 509.	0.4	0.4
4/17/2020	Review and analyze February 13, 2020 House State Affairs meeting minutes on HB 509.	0.3	0.3
4/17/2020	Review and analyze February 21, 2020 House State Affairs Meeting on HB 509.	2.2	2.2
4/18/2020	Review and analyze House floor debate and vote on HB 509.	0.9	0.9
4/18/2020	Review and analyze Senate State Affairs Committee meeting on HB 509.	1.6	1.6
4/22/2020	Participate in call with Mike Lanosa and Isaac Belfer regarding background of Idaho HB 509 challenge.	0.5	0.4
4/27/2020	Review and analyze complaint filed in Hecox v. Little.	0.5	0
4/28/2020	Review and analyze case law and draft outline of the same regarding likelihood of success on the merits of equal protection claim challenging HB 509.	4.3	2.1
4/29/2020	Review and analyze transcripts of Senate and House hearings on HB 509 and create outline of governmental reasons given for passing HB 509.	5.4	5.4
4/30/2020	Review and analyze strength of governmental reasons given for passing HB 509.	2.6	2.6
4/30/2020	Review and analyze case law regarding transgender bathroom bans and add analysis to merits briefing outline.	2.4	2.4
4/30/2020	Review and analyze case law cited in HB 509 and add analysis to merits briefing outline.	0.3	0
5/1/2020	Revise merits briefing outline.	1.7	1.7
5/1/2020	Review and analyze case law regarding burden of proof issues relevant to HB 509 challenge.	2.9	2.9
5/1/2020	Review and analyze legal standards for preliminary injunction and dissolution of permanent injunction and add to merits briefing outline.	1.5	0

5/2/2020	Review and analyze Defendants' opposition to motion for clarification and draft summary regarding the same.	0.4	0.4
5/4/2020	Participate in Covington team meeting regarding merits briefing outline and case strategy.	0.7	0.7
5/4/2020	Meet with Mike Lanosa to discuss division of research on merits briefing issues.	0.2	0.2
5/5/2020	Review and analyze academic literature for statistical information on transgender populations.	3.8	3.8
5/5/2020	Review and analyze case law regarding Idaho law re: impact on pending applications when law takes effect.	0.6	0.6
5/5/2020	Revise merits briefing outline.	1.5	1.5
5/7/2020	Meet with Henry Liu to discuss edits to reply in support of motion for clarification.	0.1	0.1
5/7/2020	Review, analyze, and edit reply in support of motion for clarification.	1.7	1.7
5/7/2020	Add additional edits to reply in support of motion for clarification based on discussion with Henry Liu.	1.1	1.1
5/8/2020	Review and analyze transgender birth certificate cases pending in other jurisdiction and other cases that have cited the decisions issued in those cases.	2.7	1.2
5/8/2020	Review and analyze case law regarding government interest in enforcing private contracts or policies.	1.1	1.1
5/8/2020	Review and analyze Idaho statutes requiring individuals to present a birth certificate.	0.5	0.5
5/8/2020	Review and analyze case law regarding level of scrutiny to be used in evaluating government interest.	1.7	0
5/12/2020	Review and analyze case law on First Amendment compelled speech claim.	2.6	0
5/12/2020	Research and analyze requirements for associational and third-party standing.	1.6	1.6
5/12/2020	Research and analyze case law regarding irreparable harm when plaintiff has third-party or associational standing.	2.2	2.2
5/13/2020	Draft questions for moot oral argument on motion for clarification.	1	1
5/13/2020	Review and analyze final draft of reply in support of motion for clarification.	0.5	0.5
5/13/2020	Review and analyze supplementary research regarding preliminary injunction.	0.3	0.3
5/13/2020	Review and analyze case law on First Amendment compelled speech claim.	1.6	0
5/13/2020	Review, analyze, and edit draft public record requests addressed to House and Senate State Affairs Committees, Governor Little, Representative Young, and the Legislative Services Office.	2.5	2.5
5/14/2020	Review and analyze District of Idaho case law regarding irreparable harm and infringement of constitutional rights issue and draft summary regarding the same.	1.5	1.5
5/14/2020	Review and analyze case law on First Amendment compelled speech claim.	1.4	0
5/14/2020	Research and analyze federal and state laws and regulations requiring the presentation of a birth certificate to obtain a license or service.	2.4	2.4
5/14/2020	Draft and circulate email to Lambda Legal regarding edits to public records requests.	0.2	0.2
5/15/2020	Participate in moot of motion for clarification.	1.5	1.5
5/18/2020	Review and revise analysis of First Amendment claim in merits briefing outline.	1.6	0
5/19/2020	Participate in debrief of oral argument on motion for clarification.	0.4	0.4
5/19/2020	Review and analyze case law on transgender issues and their intersection with First Amendment law.	2.3	0
5/20/2020	Review and analyze case law in support of due process claim and begin drafting outline of the same.	3.6	0

5/22/2020	Review and analyze case law on due process claim and update merits briefing outline on the same.	3.5	0
6/1/2020	Review and analyze William Isasi's comments on merits briefing outline.	0.4	0.4
6/9/2020	Review case law and draft memorandum regarding availability of post-judgment discovery.	4.8	4.8
6/10/2020	Draft and circulate email to team regarding memorandum about post-judgment discovery and plan to monitor Idaho Department of Health and Welfare's enforcement of HB 509.	0.2	0.2
6/17/2020	Review and analyze email communications and draft letter to opposing counsel regarding enforcement of HB 509.	0.5	0.5
6/22/2020	Review and edit second motion for clarification.	1.6	1.6
6/24/2020	Review and analyze court order regarding briefing schedule on motion for clarification.	0.1	0.1
6/30/2020	Review and analyze email communication from Steve Olson regarding Defendant's next course of action and proposed response.	0.1	0.1
7/6/2020	Review and analyze changes to application to request gender change on birth certificate.	0.3	0.3
7/6/2020	Review analyze opposition to and draft reply in support of motion for clarification.	1	1
7/6/2020	Meet with Isaac Belfer to discuss affirmative discovery requests.	0.1	0.1
7/13/2020	Draft first set of requests for production.	2.1	2.1
7/20/2020	Prepare for practice moot in preparation for oral argument on motion for clarification.	0.5	0.5
7/20/2020	Participate in practice moot in preparation for oral argument on motion for clarification.	1.2	1.2
7/22/2020	Telephone conference with Mr. Renn, Mr. Lanosa, and Ms. Cockerille re: hearing on motion for clarification.	0.3	0
1/6/2021	Review and analyze outline of expected arguments in support of and in opposition to forthcoming motion and draft expert report.	1	1
1/8/2021	Participate in meeting to discuss strategy and other evidence needed to defend against defendants' anticipated motion.	0.6	0.6
1/8/2021	Review and analyze draft report and outline of arguments and evidence expected to be presented in defendants' forthcoming motion.	1.1	1.1
2/9/2021	Draft letter to Steve Olsen regarding injunction violation.	1.7	1.7
2/9/2021	Prepare exhibits to accompany letter regarding injunction violation.	0.3	0.3
2/10/2021	Review and analyze response email from Steve Olsen. Draft reply and circulate to team for review.	0.4	0.4
2/10/2021	Draft and send email to Steve Olsen regarding injunction violation attaching demand letter.	0.3	0.3
2/11/2021	Revise and send email to Steve Olsen regarding injunction violation.	0.1	0.1
2/12/2021	Meet with Steve Olsen to discuss Defendants' investigation into injunction violation.	0.2	0.2
2/22/2021	Draft and circulate email analyzing letter received from Steve Olsen regarding injunction violation.	0.5	0.5
3/1/2021	Draft, circulate and revise email to Steve Olsen regarding outstanding requests in connection with injunction violation.	0.4	0.4
5/28/2021	Review and analyze co-counsel agreement.	0.3	0
6/1/2021	Review and analyze co-counsel agreement; review and revise client engagement letter; circulate both to B. Miller for review.	1.3	0
6/2/2021	Meet with Brad Miller to discuss co-counsel agreement and client engagement letter.	0.2	0
6/3/2021	Revise client engagement letter; draft and send email to co-counsel regarding co-counsel agreement and client engagement letter.	0.4	0

6/9/2021	Revise client engagement letter.	0.1	0
6/9/2021	Participate in meeting with team to discuss motion for attorneys' fees.	0.6	0.6
6/9/2021	Meet with P. Renn to discuss client engagement letter.	0.2	0
6/14/2021	Email communications regarding stipulation to extend deadline for fees motion.	0.3	0.3
6/15/2021	Review and analyze draft stipulation to extend time to file fees motion and proposed order granting the same; email correspondence regarding stipulation; draft notice of change of address.	1.1	1.1
6/17/2021	Email communications regarding stipulation to extend deadline to file fees motion.	0.2	0.2
6/18/2021	Revise and send client engagement letters.	0.6	0
6/21/2021	Draft and send email communications regarding stipulation to extend time for fees motion.	0.2	0.2
6/22/2021	Finalize for filing change of address and stipulation to extend time for filing a fees motion; email and phone communications regarding the same.	1.1	0.5
7/9/2021	Participate in team call regarding fees petition.	0.5	0.5
7/19/2021	Draft and circulate emails regarding recent court orders granting fee petitions.	0.2	0.2
7/23/2021	Review and analyze case law on hourly rates awarded by the District of Idaho on fee petitions.	0.8	0.8
7/26/2021	Review and analyze case law regarding billing rates in Boise for civil rights litigators.	3.2	3.2
7/27/2021	Review and analyze case law regarding Boise billing rates for civil rights litigators; draft declaration regarding the same.	4.8	4.8
7/28/2021	Draft email to Lambda Legal team regarding research on billing rates; draft proposed Boise rates for all attorneys; revise draft declaration regarding legal research on Boise billing rates.	2.3	2.3
8/30/2021	Participate in team meeting regarding anticipated motion for attorneys' fees.	1.1	1.1
8/30/2021	Review and analyze Thomas Lloyd's biography; draft and send email communications to M. Cockerille and T. Lloyd regarding draft declaration.	0.5	0.5
9/1/2021	Review and analyze sample declaration in support of motion for attorneys' fees in anticipation of drafting declaration in support of motion for attorneys' fees.	0.3	0.3
9/1/2021	Draft summary of relevant case law for declaration in support of motion for attorneys' fees.	2.6	2.6
9/2/2021	Meet with Tom Lloyd to discuss Boise rates in advance of drafting declaration in support of motion for fees.	0.5	0.5
9/3/2021	Review and analyze letter from Steve Olsen regarding fees settlement proposal; email communications with team regarding analysis of the same.	0.6	0.6
9/7/2021	Draft qualifications section of Lloyd declaration in support of motion for attorneys' fees; revise summary of case law in Lloyd declaration.	1.8	1.8
9/9/2021	Review attorney biographies and begin drafting biography summaries for Lloyd declaration in support of motion for attorneys' fees.	1.4	1.4
9/15/2021	Continue drafting attorney biographies for Lloyd declaration in support of motion for attorneys' fees; review and revise Lloyd declaration.	2.3	2.3
9/22/2021	Review edits to Lloyd declaration from team members and revise Lloyd declaration; review and assemble all attorney resumes; email communications with T. Lloyd regarding draft declaration.	1.5	1.5
9/23/2021	Review and revise memorandum in support of motion for attorneys fees.	1	0.5

Total: 103.6

Hours for Plaintiff's First Motion To Clarify:

10

Fees for Plaintiff's First Motion To Clarify

\$2,400.00

F.V. v. Jeppesen Time Sheet for Attorney Michael Lanosa			
Date	Description	Time Spent	Time Billed
4/22/2020	Prepare for, attend teleconference with I. Belfer, C. Smith re: Idaho birth certificate case.	0.9	0.4
4/29/2020	Legal research re: intermediate scrutiny standard; communicate with K. King re: same.	2	0
5/1/2020	Legal research re: preliminary injunction factors; draft, revise draft outline of preliminary injunction motion; communicate re: same.	10.9	5
5/5/2020	Perform additional legal research to support preliminary injunction motion; memorandum to H. Liu re same.	4	2
5/6/2020	Additional legal research re: irreparable harm.	3.7	3.7
5/7/2020	Revise, communicate re motion for clarification reply brief; perform factual research to support potential PI motion.	7.3	3.5
5/8/2020	Review correspondence from Lambda team; communicate re: strategy re: PI motion; perform further legal research to support merits arguments.	2.5	2.5
5/11/2020	Review correspondence from Lambda re: case strategy; review scientific article re the effect on transgender people of having correct identity documents; review as-filed motion for clarification reply brief; prepare for and attend weekly strategy meeting with Lambda; perform further factual research to support merits arguments.	4.4	2.2
5/12/2020	Perform additional research re: irreparable harm element of preliminary injunction test; draft memorandum re: same.	6.1	3
5/13/2020	Additional legal research re: irreparable harm; communicate re: same.	2	2
6/1/2020	Communicate re: merits outline; analyze, communicate re: Judge Dale's order on plaintiffs motion for clarification in F.V. v. Barron.	2.4	2.4
6/2/2020	Perform legal research to support additional arguments in merits outline regarding opposition to motion to dissolve.	1.8	1.8
6/5/2020	Perform legal research re: HB 509 discrimination issue.	4.6	2
6/6/2020	Research cases involving successful equal protection challenges under the rational basis review standard.	5.8	3
6/20/2020	Review correspondence re: request for status conference.	0.2	0.2
6/30/2020	Review correspondence from P. Renn re: communications with opposing counsel.	0.1	0
7/16/2020	Review, revise draft RFPs.	2.9	2.9
7/20/2020	Prepare for, participate in team meeting to moot oral argument on Plaintiffs' second motion for clarification.	2.1	2.1
7/22/2020	Telephone conference with Mr. Renn, Ms. Smith, and Ms. Cockerille re: hearing on motion for clarification.	0.3	0
7/27/2020	Communicate with team re: email from P. Renn and proposed discovery requests to defendants.	0.2	0.2
7/28/2020	Review Lambda's revision to the draft requests for production; communicate with team regarding same; further revise draft requests for production.	1.1	1.1
7/29/2020	Review the District of Idaho's local rules regarding discovery; draft interrogatories to defendants; communicate with Covington team re: same.	2.7	2
7/31/2020	Confer with P. Renn re: RFPs; communicate with Covington team re: same.	0.4	0.4

8/10/2020	Review draft letter to opposing counsel from P. Renn; review recent media coverage of the court's order granting Plaintiffs' second motion for clarification; revise draft interrogatories and requests for production; communicate with Covington colleagues re: same.	1.6	0
8/11/2020	Review correspondence from opposing counsel; review, communicate re: draft discovery requests; review IDHW's revised sex marker change application packet and compare same to pre-HB 509 version.	1.1	1.1
8/16/2020	Legal research re: post-judgment discovery.	6.9	6.9
8/17/2020	Draft memorandum to team regarding post-judgment discovery research; communicate with P. Renn and K. Ingelhart re: Lambda's revisions to draft RFPs; incorporate revisions into current version of draft RFPs.	0.9	0.9
1/4/2021	Review, analyze memoranda from Lambda team re: potential topics for discovery and other strategies in opposing Defendants' anticipated motion to dissolve.	1.3	1.3
1/6/2021	Communicate re: documents from K. Ingelhart; plan and prepare for the taking of discovery in connection with defendants' anticipated motion.	0.8	0.8
1/8/2021	Prepare for and attend call with K. Ingelhart re: research to support opposition to defendants' anticipated motion; compile list of research topics related to the merits of plaintiffs' claims and tentative assignments for Covington team and circulate same to I. Belfer and C. Smith; begin researching assigned merits topics.	4.4	4.4

Total: 57.8

Hours for Plaintiff's First Motion To Clarify: 10.6

Fees for Plaintiff's First Motion To Clarify \$2,650.00

F.V. v. Jeppesen Time Sheet for Attorney Isaac Belfer			
Date	Description	Time Spent	Time Billed
4/22/2020	Participate in call to discuss Idaho matter with Michael Lanosa and Colleen Smith.	0.4	0.4
4/27/2020	Prepare for, participate in call with co-counsel re: litigation tasks.	2.5	1
4/28/2020	Perform legal research re: standing.	2.2	2.2
4/29/2020	Perform legal research re: standing and pleading issues.	1.8	1.8
4/30/2020	Perform legal research re: standing, pleading issues.	4.4	3.4
5/1/2020	Analyze pleading issues in preparation for call.	0.8	0
5/1/2020	Draft memo re: standing/pleading issues.	5.2	4.2
5/1/2020	Perform legal research re: standing, pleading issues.	1.6	1.6
5/2/2020	Revise memo re: standing/pleading issues.	1.7	1.7
5/4/2020	Analyze motion for clarification briefing.	1	1
5/4/2020	Draft research note to co-counsel re: standing and other strategic issues.	1.5	1.5
5/5/2020	Analyze standing issues.	1.7	1.7

5/5/2020	Revise memo re: standing, strategic issues.	1.9	1.9
5/7/2020	Revise reply in support of motion for clarification.	1.2	1.2
5/8/2020	Analyze strategic issues re new complaint.	1.8	0.8
5/15/2020	Participate in moot on motion for clarification	1.4	1.4
6/1/2020	Analyze decision on motion for clarification and emails re: same.	0.6	0.6
6/20/2020	Perform legal research re: ripeness.	4.5	4.5
6/22/2020	Revise motion for clarification.	3	3
7/6/2020	Review motion for clarification briefing.	0.5	0.5
7/6/2020	Discuss motion for clarification, case strategy with litigation team.	0.6	0.6
7/15/2020	Revise RFPs.	1.2	1.2
8/7/2020	Review decision on motion for clarification.	0.4	0.4
8/12/2020	Exchange emails re: state's compliance with injunction.	0.1	0.1
12/14/2020	Discuss response to government's anticipated motion to dissolve injunction.	0.7	0.7
1/8/2021	Participate in call re: potential expert report.	0.7	0.7
1/12/2021	Perform legal research re: potential depositions.	1	1
1/15/2021	Analyze issues re: export report related to opposing motion to dissolve.	1.6	1.6
1/21/2021	Analyze issues re: export report related to opposing motion to dissolve.	1.1	1.1
2/9/2021	Revise letter re: violation of injunction.	0.6	0.6

Total: 42.4

Hours for Plaintiff's First Motion To Clarify: 4.2

Fees for Plaintiff's First Motion To Clarify \$1,176.00

F.V. v. Jeppesen Time Sheet for Attorney Jamie Farnsworth			
Date	Description	Time Spent	Time Billed
3/19/2020	Research legislative activity regarding HB 509; send emails with Mr. Renn re: same.	2.8	0
3/20/2020	Research legislative activity regarding HB 509; send emails with Mr. Renn re: same.	2.3	0
3/23/2020	Research legislative activity regarding HB 509	2.9	0
3/24/2020	Research legislative activity regarding HB 509; emails with Mr. Renn re: same.	1.9	0
3/26/2021	Research legislative activity regarding HB 509	1.7	0

3/30/2020	Research legislative activity regarding HB 509.	1.7	0
3/30/2020	Telephone conference with litigation team to discuss litigation tasks.	1	0.5
3/31/2020	Research legislative history regarding HB 509, e.g., gather lawmaker statements; email with Ms. Ingelhart and others re: legislative history	0.9	0
4/1/2020	Research legislative history regarding HB509	1.2	0
4/1/2020	Telephone conference with Mr. Renn re: legislative history research	0.3	0.3
4/2/2020	Research legislative history regarding HB 509, including emails with Mr. Renn and others re: same.	1.8	0
4/3/2020	Emails with Mr. Renn and others re: legislative history research, including access to unposted hearing audio or transcripts	1.5	0
4/5/2020	Review audio/video from HB 509 hearings and gather lawmaker statements	3.1	0
4/8/2020	Email with Mr. Renn and Ms. Cockerille re: legislative history research; work on compiling and organizing all HB 509 related documents	0.9	0
4/9/2020	Email litigation team re: access to organized HB 509 related documents.	0.2	0
4/10/2020	Research legislative history regarding HB 509; emails with Mr. Renn, Ms. Ingelhart, and others re: same.	0.5	0
4/10/2020	Call with litigation team to discuss litigation tasks.	1.1	0.5
4/13/2020	Research legislative history regarding HB 509, including emails with Mr. Renn and others re: same; research formal public records requests	5.2	5.2
4/14/2020	Cite-check, review, and proofread Motion for Clarification; review lawmaker statements re HB 509	4.9	4.9
4/15/2020	Finish cite-checking Motion for Clarification and proofread same	3.8	3.8
4/24/2020	Compile relevant FV documents to share, and email co-counsel; Email with Mr. Renn re: same and public records requests	1	0
4/27/2020	Send emails with Mr. Renn re: lawmaker statements; Work on public records request	1.5	1.5
4/27/2020	Call with litigation team to discuss litigation tasks.	1	0.5
4/30/2020	Contact Legislative Services Office about public records request; send email and draft of public records request to litigation team; Emails with Mr. Renn re: same.	2.4	2.4
5/7/2020	Work on Reply to Motion for Clarification, including cite-check; Send emails with Mr. Renn re: same	3.7	3.7
5/11/2020	Emails with Mr. Renn re: public records request	0.2	0.2
5/11/2020	Call with litigation team to discuss litigation tasks.	1.1	0.5
5/12/2020	Finalize drafts of public records requests; Emails with Mr. Renn and Ms. Huppert re: same.	3.1	3.1
5/18/2020	Call with litigation team to discuss litigation tasks.	1	0.5
5/20/2020	Email with team re public records requests	0.1	0.1
5/26/2020	Call with litigation team to discuss litigation tasks.	1	0
6/8/2020	Call with litigation team to discuss litigation tasks.	0.6	0
6/15/2020	Call with litigation team to discuss litigation tasks	0.4	0
6/19/2020	Email with Ms. Huppert re: Idaho legislative history; Email with Mr. Renn re: Motion re: Status Conference	0.5	0
6/22/2020	Email with Ms. Huppert re: receipt of large files from Idaho re: public records; Work on cite-checking Motion for Clarification	4.1	4.1

6/22/2020	Call with litigation team to discuss litigation tasks.	0.4	0
6/29/2020	Call with litigation team to discuss litigation tasks.	0.6	0
7/6/2020	Call with litigation team to discuss litigation tasks.	0.6	0
7/6/2020	Work on cite checking reply with Ms. Huppert; analyze changes to new application packet on Idaho website	3.2	3.2
7/7/2020	Finish reviewing and proofing reply; Email with Ms. Huppert re: same	2.1	2.1
7/22/2020	Listen and take notes at hearing; meet with litigation team to discuss; clean up notes and circulate to team.	2	0
8/10/2020	Call with litigation team to discuss litigation tasks.	0.9	0
8/11/2020	Compare new Idaho application packet with previous and circulate redline to litigation team	0.8	0.8
9/17/2021	Cite check and proofread Wysong declaration	1.7	0.9
9/23/2021	Review and proofread Renn declaration	1.2	0.6
9/24/2021	Cite check fees motion	2.6	2.6
9/27/2021	Cite check fees motion	3.4	3.4

Total: 45.4

2020 Hours 37.9

2021 Hours 7.5

Hours for Plaintiff's First Motion To Clarify: 12.4

Fees for Plaintiff's First Motion To Clarify \$2,170.00

Total Time Minus Time on First Motion To Clarify 33

2020 Hours 25.5

2021 Hours 7.5

EXHIBIT A-2***F.V. vs. Jeppesen, et al., Case No. 1:17-cv-000170-CWD*****Summary of Plaintiffs' counsels' hours and rates for Plaintiffs' first motion to clarify**

Attorney	Hours	Rate - 2020	Total Fee
Peter Renn	145.1	\$650	\$94,315.00
Nora Huppert	33.9	\$325	\$11,017.50
Kara Ingelhart	6.9	\$320	\$2,208.00
Monica Cockerville	7.5	\$410	\$3,075.00
Colleen Smith	10	\$240	\$2,400.00
Michael Lanosa	10.6	\$250	\$2,650.00
Isaac Belfer	4.2	\$280	\$1,176.00
Jamie Farnsworth, Paralegal	12.4	\$175	\$2,170.00
Total:	230.6		\$119,011.50

F.V. v. Jeppesen Time Sheet for Attorney Peter Renn		EXHIBIT B-1	
Date	Description	Time Spent	Time Billed
3/20/2020	Analyze case filings in federal lawsuit filed by NAATP raising allegations regarding HB 509 and potential implications for further litigation in F.V	0.9	0
3/20/2020	Email with M.R. of NAATP regarding case filings in light of potential implications for further litigation in F.V.	0.2	0
3/20/2020	Draft agenda for issues to discuss with M.R. regarding NAATP litigation in light of potential implications for further litigation in F.V.	0.3	0
3/23/2020	Draft list of tasks to prepare for litigation relating to HB 509 and agenda for litigation team conference.	0.5	0.5
3/23/2020	Telephone conference with litigation team to discuss initial tasks to prepare for litigation relating to HB 509.	1.4	1.4
3/23/2020	Telephone conference with M.R. regarding NAATP litigation in light of potential implications for further litigation in F.V.	0.3	0
3/30/2020	Draft agenda for issues to discuss during conference with litigation team.	0.5	0.5
3/30/2020	Review and analyze preclusion research findings from Ms. Huppert as potential basis for challenging HB 509.	0.5	0.5
3/30/2020	Telephone conference with litigation team to discuss initial tasks to prepare for litigation relating to HB 509.	1	1
3/31/2020	Telephone conference with Lambda Legal attorney T. Borelli to consult regarding litigation strategy.	0.7	0.7
3/31/2020	Analyze and research potential procedural options for confirming HB 509 violates existing injunction.	1.3	1.3
3/31/2020	Telephone conference with Ms. Huppert to discuss dissolution research.	0.3	0.3
3/31/2020	Review and analyze new statutory language.	1.4	1.4
4/1/2020	Telephone conference with Ms. Ingelhart re: statutory interpretation of HB 509 and dissolution motion.	0.4	0.4
4/1/2020	Telephone conference with Ms. Farnsworth re legislative history research.	0.3	0.3
4/1/2020	Telephone conference with Ms. Huppert re: research on existing injunction and 509.	0.7	0.7
4/1/2020	Analyze research from Ms. Huppert re: Rule 60.	0.5	0.5
4/2/2020	Telephone conference with M.R. re: NAATP litigation in light of potential implications for further litigation in F.V.	0.1	0
4/2/2020	Telephone conference with Mr. Zanzig re: legal challenge to HB 509.	0.9	0.9
4/2/2020	Email Ms. Ingelhart, Ms. Huppert, and Ms. Cockerille re: communication with Mr. Zanzig.	0.8	0.8
4/2/2020	Analyze and research legal issues for challenge to 509, including FV decision, potential motion for clarification, contempt, and Rule 60.	3.9	3.9
4/3/2020	Emails with Ms. Ingelhart and Ms. Huppert re: potential co-counsel.	0.5	0
4/3/2020	Analyze initial litigation tasks to accomplish and potential division of labor.	1.3	1.3
4/3/2020	Draft outline of potential motion seeking relief.	1.8	1.8
4/6/2020	Draft outline of potential motion seeking relief.	1.1	1.1
4/6/2020	Emails with Ms. Taylor, Mr. Castillo, Ms. Ingelhart, Ms. Huppert, and Ms. Cockerille re: potential co-counsel.	0.4	0
4/6/2020	Draft agenda for litigation team call with initial litigation tasks to accomplish.	1.3	1.3
4/6/2020	Draft outline of motion for clarification.	1.2	1.2

4/6/2020	Telephone conference with Ms. Ingelhart, Ms. Huppert, and Ms. Cockerille re: initial litigation tasks.	1.5	1.5
4/6/2020	Telephone conference with individual potentially harmed by HB 509, J-W.	1	1
4/6/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert re: communication with J-W.	1	1
4/7/2020	Prepare for call with potential Covington co-counsel Mr. Isasi, Ms. Veta, and Mr. Liu.	1.3	0
4/7/2020	Telephone conference with potential Covington co-counsel.	0.7	0
4/7/2020	Telephone conference with Ms. Ingelhart re: potential Covington co-counsel.	0.3	0
4/7/2020	Research for motion for clarification	1.4	1.4
4/7/2020	Analyze and revise co-counsel agreement for Covington.	0.8	0
4/7/2020	Email Mr. Castillo regarding co-counsel agreement with Covington.	0.3	0
4/8/2020	Email with Ms. Farnsworth regarding research regarding lawmaker statements.	0.3	0.3
4/8/2020	Draft motion for clarification.	3.7	3.7
4/8/2020	Research for motion for clarification.	0.6	0.6
4/8/2020	Telephone conference with Mr. Castillo regarding co-counseling with Covington.	0.3	0
4/8/2020	Draft email to Covington team regarding co-counseling.	0.5	0
4/8/2020	Telephone conference with Ms. Ingelhart regarding co-counseling with Covington.	0.3	0
4/9/2020	Draft motion for clarification.	6.7	6.7
4/10/2020	Draft co-counsel agreement; email Covington re: same.	1.2	0
4/10/2020	Draft agenda for litigation team call with initial litigation tasks.	0.7	0.7
4/10/2020	Telephone conference with Ms. Huppert regarding research for motion for clarification.	0.5	0.5
4/10/2020	Research and draft motion for clarification.	3	3
4/10/2020	Telephone conference with full litigation team regarding initial litigation tasks.	1.1	1.1
4/11/2020	Research and draft motion for clarification.	5.1	5.1
4/12/2020	Draft motion for clarification.	5.1	5.1
4/13/2020	Draft motion for clarification.	12.4	12.4
4/14/2020	Email Ms. Ingelhart regarding review of motion.	0.1	0.1
4/14/2020	Email Ms. Martin regarding further litigation.	0.1	0.1
4/14/2020	Email Ms. Farnsworth regarding lawmaker statements and review of brief.	0.2	0.2
4/14/2020	Email Ms. Huppert regarding further research tasks relevant to clarification motion.	0.2	0.2
4/14/2020	Email Ms. Cockerille regarding options to shorten time.	0.4	0.4
4/14/2020	Review additional recorded legislative proceedings.	2.1	2.1
4/14/2020	Telephone conference with Ms. Cockerille regarding potentially shortening time.	0.2	0.2

4/14/2020	Draft motion for clarification and motion to shorten time.	2.3	2.3
4/14/2020	Draft proposed order to shorten time and review rules for same.	0.4	0.4
4/15/2020	Email Ms. Smith regarding revisions to motion for clarification; review suggested revisions.	0.6	0.6
4/15/2020	Email with Ms. Cockerille regarding revisions to motion for clarification and to shorten time.	0.2	0.2
4/15/2020	Revise motion for clarification	1.8	1.8
4/15/2020	Revise motion for clarification and to shorten time; email litigation team re: same.	4.6	4.6
4/15/2020	Telephone conference with individual potentially harmed by HB 509, L.B., regarding potential participation in litigation	1.3	1.3
4/15/2020	Draft email to Mr. Zanzig re: forthcoming motions, to transmit on filing day.	0.4	0.4
4/17/2020	Draft agenda for weekly litigation call.	0.5	0.5
4/17/2020	Attend weekly litigation call to discuss litigation tasks and division of labor, including further research in support of clarification motion.	0.9	0.9
4/17/2020	Review order shortening time and setting hearing; review general order cited in order.	0.2	0.2
4/17/2020	Review complaint in related litigation challenging HB 500 with potential implications for litigation in F.V.	0.5	0
4/23/2020	Email Ms. Ingelhart re: legislative justifications for HB 509.	0.3	0.3
4/24/2020	Email with Ms. Farnsworth regarding sharing of documents with Covington.	0.1	0.1
4/24/2020	Research on standing/mootness for clarification reply.	2.9	2.9
4/24/2020	Research FRCP 60(b)(5) case law.	2.6	2.6
4/27/2020	Prepare agenda for weekly team call to discuss litigation tasks.	0.5	0.5
4/27/2020	Telephone conference with litigation team to discuss litigation tasks and division of labor, including further research in support of clarification motion and development of facts relevant to HB 509.	1	1
4/27/2020	Review HB 509 legislative justification rebuttal outline from Ms. Ingelhart and comment on same.	1.7	1.7
4/27/2020	Review legislative history for justification rebuttal outline.	0.3	0.3
4/27/2020	Telephone conference with Ms. Ingelhart re: identification of individuals potentially harmed by HB 509.	0.2	0.2
4/27/2020	Telephone conference with Ms. Huppert re: injunction dissolution research.	0.3	0.3
4/27/2020	Email Ms. Huppert re: health research justification for HB 509.	0.4	0.4
4/27/2020	Telephone conference with Ms. Borelli re: co-counsel agreement.	0.4	0
4/28/2020	Email Ms. Taylor re: co-counsel agreement.	0.8	0
4/28/2020	Telephone conference with Ms. Taylor re: co-counsel agreement.	0.4	0
4/28/2020	Email Ms. Ingelhart re: co-counsel agreement.	0.3	0
4/28/2020	Review informal transcripts of legislative proceedings, and annotate same.	0.8	0.8
4/29/2020	Draft email to Ms. Taylor re: co-counsel agreement.	0.6	0
4/29/2020	Review informal transcripts of legislative proceedings, and annotate same.	0.8	0.8

4/29/2020	Telephone conference with Ms. Taylor and Ms. Veta re: co-counsel agreement.	0.3	0
4/29/2020	Telephone conference with Ms. Taylor re: co-counsel agreement.	0.1	0
4/29/2020	Email Ms. Ingelhart and Ms. Huppert re: co-counsel agreement.	0.3	0
4/29/2020	Draft email to Ms. McGowan re: co-counseling with Covington.	0.7	0
4/30/2020	Review informal transcripts of legislative proceedings, and annotate same.	3.7	3.7
5/1/2020	Review informal transcripts of legislative proceedings, and annotate same.	3.2	3.2
5/1/2020	Telephone conferences with Ms. Taylor re: co-counsel agreement.	0.3	0
5/1/2020	Telephone conference with Ms. Veta re: co-counsel agreement.	0.1	0
5/1/2020	Analyze potential arrangement with co-counsel and email with Ms. Taylor and Ms. McGowan regarding same.	2.2	0
5/1/2020	Review and analyze opposition to motion for clarification.	1.5	1.5
5/2/2020	Review and analyze opposition to motion for clarification; draft analysis for reply.	5	5
5/2/2020	Research for reply to motion for clarification.	0.5	0.5
5/3/2020	Research for reply to motion for clarification.	2.9	2.9
5/4/2020	Draft reply to motion for clarification.	8.3	8.3
5/5/2020	Draft reply to motion for clarification.	9.8	9.8
5/5/2020	Email Mr. Belfer re: research findings on standing and related issues.	0.3	0.3
5/6/2020	Draft reply to motion for clarification.	11.6	11.6
5/7/2020	Email Ms. Ingelhart regarding legislative testimony re: HB 509.	0.4	0.4
5/7/2020	Review revised co-counsel agreement.	0.2	0
5/7/2020	Email with Ms. Taylor re: co-counsel agreement.	0.3	0
5/7/2020	Email Ms. Veta re: co-counsel agreement.	0.2	0
5/7/2020	Revise draft of reply to motion for clarification.	0.4	0.4
5/7/2020	Email Ms. Cockerille re: co-counsel agreement.	0.3	0
5/7/2020	Analyze facts regarding individual potentially harmed by HB 509 and email Ms. Ingelhart and Ms. Huppert re: same.	1.1	1.1
5/7/2020	Email Covington team re: potential strategy, including PI/TRO considerations.	0.7	0.7
5/8/2020	Revise draft reply to motion for clarification.	5.5	5.5
5/8/2020	Email Mr. Liu re: revisions to draft of reply to motion for clarification.	0.5	0.5
5/10/2020	Email Ms. Huppert re: supplemental research relevant to reply brief.	0.2	0.2
5/10/2020	Research case law regarding consent decrees for reply brief.	1.1	1.1
5/10/2020	Review and revise reply to motion for clarification.	0.9	0.9
5/11/2020	Review reply brief prior to filing.	0.3	0.3

5/11/2020	Review new social science research relevant to corrected identity documents; email litigation team re: same.	0.3	0.3
5/11/2020	Draft agenda for weekly litigation call.	0.4	0.4
5/11/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and division of labor, including upcoming moot on motion, and further development of facts relevant to HB 509.	1.1	1.1
5/11/2020	Revise public records request relevant to HB 509.	1.5	1.5
5/11/2020	Analyze potential timing of filings in new case, if required, and impact of pending motion for clarification; draft email to Ms. Cockerille re: same.	1.7	1.7
5/11/2020	Telephone conference with Ms. Borelli potential timing of filings in new case, if required.	0.4	0.4
5/11/2020	Telephone conference with Ms. Cockerille re: potential timing of filings in new case, if required.	0.5	0.5
5/11/2020	Email litigation team re: potential preliminary injunction before HB 509 effective date.	0.6	0.6
5/11/2020	Email Ms. Ingelhart re: organizations potentially harmed by HB 509	0.3	0.3
5/11/2020	Telephone conference with individual potentially harmed by HB 509, K.C.	0.7	0.7
5/11/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert re: individual potentially harmed by HB 509, K.C.	0.4	0.4
5/11/2020	Review and revise public records request relevant to HB 509; email Ms. Farnsworth and Ms. Huppert re: same.	1.5	1.5
5/12/2020	Email Ms. Cockerille re: email from Ms. Thompson regarding hearing on motion.	0.6	0.6
5/12/2020	Prepare for hearing on motion for clarification.	3.3	3.3
5/13/2020	Email F.V. regarding additional fact gathering.	0.5	0.5
5/13/2020	Email Ms. Ingelhart and Ms. Huppert re: communications with F.V.	0.3	0.3
5/13/2020	Prepare for oral argument on motion for clarification.	5.9	5.9
5/13/2020	Prepare for and attend telephone conference with F.V. to gather additional facts.	0.9	0.9
5/13/2020	Analyze additional facts gathered from F.V.	0.4	0.4
5/15/2020	Review edits to public records request and email Ms. Huppert re: same.	0.3	0.3
5/15/2020	Prepare for oral argument on motion for clarification.	3.7	3.7
5/15/2020	Participate in moot on motion for clarification.	1.5	1.5
5/17/2020	Prepare for oral argument on motion for clarification.	6.2	6.2
5/18/2020	Prepare for oral argument on motion for clarification.	6.1	6.1
5/18/2020	Review summary from Ms. Ingelhart of conversations with potential expert witness Ms. W.	0.4	0.4
5/18/2020	Telephone conference with litigation team to discuss weekly tasks and division of labor, including potential justification briefing, and further development of facts relevant to HB 509.	1	1
5/19/2020	Prepare for and attend hearing on motion for clarification.	3.3	3.3
5/19/2020	Debrief regarding hearing on motion for clarification with litigation team.	0.4	0.4
5/26/2020	Email Ms. Ingelhart re: organization potentially harmed by HB 509.	0.4	0.4
5/26/2020	Email Ms. Ingelhart and Ms. Huppert re: oral argument on motion for clarification.	0.3	0.3

5/26/2020	Draft agenda for weekly litigation call.	0.4	0.4
5/26/2020	Attend weekly litigation call to discuss litigation tasks and division of labor, including further research to support clarification motion, and development of facts relevant to HB 509.	1.1	1.1
5/26/2020	Draft update to clients regarding hearing on motion for clarification.	0.3	0.3
5/26/2020	Email litigation team regarding fact development and potential experts relevant to HB 509.	0.2	0.2
5/29/2020	Telephone conference with Mr. Olsen re: public records request relevant to HB 509.	0.4	0.4
5/29/2020	Telephone conference with Ms. Huppert and Ms. Ingelhart re: conversation with Mr. Olsen.	0.6	0.6
6/1/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and status, including potential need for further motion seeking relief relating to HB 509.	1	1
6/1/2020	Analyze decision on motion to clarify.	0.5	0.5
6/1/2020	Email with litigation team regarding analysis of order on motion to clarify.	0.7	0.7
6/1/2020	Email plaintiffs re: decision on motion to clarify.	0.3	0.3
6/1/2020	Email Ms. Huppert re: attorneys' fees from motion to clarify.	0.3	0.3
6/2/2020	Email Ms. Huppert re: attorneys' fees from motion to clarify.	0.2	0.2
6/8/2020	Review and comment on outline regarding justifications for HB 509.	1.2	1.2
6/8/2020	Draft agenda for litigation team call.	0.3	0.3
6/8/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and status, including next steps following order on clarification motion.	0.6	0.6
6/8/2020	Telephone conference with Ms. Ingelhart re: potential experts relevant to HB 509.	0.4	0.4
6/9/2020	Review and revise stipulation and order regarding fees and email Ms. Huppert re: same.	0.7	0.7
6/10/2020	Email Ms. Huppert re: communications with opposing counsel regarding stipulation and order on fees.	0.3	0.3
6/10/2020	Draft email to Mr. Olsen re: defendants' future actions in light of clarification order; analyze order for same; email litigation team re: proposed communication.	1.3	1.3
6/10/2020	Review and analyze research re: post-judgment discovery and email Ms. Smith re: same.	0.5	0.5
6/12/2020	Revise stipulation and order regarding fees; email with Mr. Olsen re: same; finalize documents for filing.	0.3	0.3
6/15/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks and status, including potential next steps after effective date of HB 509.	0.4	0.4
6/15/2020	Draft agenda for telephone conference with litigation team for weekly call to discuss litigation tasks and status.	0.2	0.2
6/16/2020	Telephone conference with Mr. Olsen re: Defendants' next steps.	0.4	0.4
6/16/2020	Email litigation team regarding telephone conference with Mr. Olsen and potential next steps.	0.8	0.8
6/16/2020	Analyze potential next steps regarding Defendants' enforcement plan and draft proposed correspondence to Mr. Olsen for feedback from litigation team.	1.9	1.9
6/16/2020	Email Ms. Huppert re: next steps for beneficiary of injunction who would be harmed by HB 509 enforcement.	0.2	0.2
6/17/2020	Revise proposed correspondence to Mr. Olsen and email litigation team re: same.	0.8	0.8

6/17/2020	Telephone conference with Mr. Liu re: next steps with respect to Mr. Olsen.	0.4	0.4
6/17/2020	Email litigation team regarding potential status conference to address defendants' enforcement of HB 509.	0.2	0.2
6/17/2020	Draft proposed communication to chambers requesting status conference for review by litigation team; email litigation team re: same.	1	1
6/17/2020	Draft proposed status report to address defendants' enforcement of HB 509.	0.5	0.5
6/18/2020	Draft proposed status report to address defendants' enforcement of HB 509.	3.7	3.7
6/18/2020	Telephone conference with Ms. Cockerille regarding notice to Defendants regarding request for status conference.	0.2	0.2
6/18/2020	Email litigation team regarding notice to Defendants regarding request for status conference and revisions to email to chambers.	0.3	0.3
6/18/2020	Review letter from Mr. Olsen re: enforcement plans.	0.2	0.2
6/18/2020	Revise draft email to chambers requesting status conference.	0.7	0.7
6/18/2020	Email Mr. Olsen regarding request for status conference.	0.3	0.3
6/18/2020	Email Ms. Huppert re: public records request and confidentiality restrictions requested for same.	0.3	0.3
6/18/2020	Email Ms. Ingelhart regarding potential expert witness relevant to HB 509.	0.2	0.2
6/19/2020	Draft motion seeking further clarification relief.	3.5	3.5
6/20/2020	Draft motion seeking further clarification relief and research for same.	12.1	12.1
6/20/2020	Telephone conference with Ms. Huppert regarding public records request documents and motion for further clarification.	0.7	0.7
6/21/2020	Draft motion seeking further clarification relief and research for same.	14	14
6/22/2020	Revise motion seeking further clarification relief.	3.9	3.9
6/22/2020	Draft agenda for litigation team call to discuss tasks and division of labor.	0.1	0.1
6/22/2020	Telephone conference with litigation team to discuss motion for clarification and documents produced in response to public records request.	0.4	0.4
6/22/2020	Revise motion seeking further clarification relief; draft cover motion and attorney declaration.	1.7	1.7
6/22/2020	Revise motion seeking further clarification relief	1.5	1.5
6/22/2020	Review and finalize brief for filing.	1.4	1.4
6/24/2020	Telephone conference with Ms. Ingelhart regarding oral argument on motion for clarification.	0.2	0.2
6/24/2020	Telephone conference with Ms. Huppert regarding oral argument on motion for clarification	0.2	0.2
6/24/2020	Email with F.V. regarding status and timeline of litigation.	0.5	0.5
6/24/2020	Email with litigation team regarding court email regarding briefing schedule.	0.1	0.1
6/25/2020	Email Mr. Liu regarding ripeness argument for motion for clarification.	0.3	0.3
6/25/2020	Emails with Ms. Ingelhart, Ms. Huppert, and others re: communications with individuals potentially harmed by HB 509.	0.5	0.5
6/26/2020	Telephone conference with Dr. H., Ms. Ingelhart, and Ms. Huppert re: potential expert testimony relevant to HB 509.	1	1
6/26/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert to debrief re: potential expert testimony of Dr. H. relevant to HB 509.	0.4	0.4
6/29/2020	Draft agenda for weekly litigation call to discuss updates and tasks.	0.2	0.2

6/29/2020	Telephone conference with litigation team to discuss updates and tasks, including remainder of briefing on motion for clarification.	0.6	0.6
6/29/2020	Email litigation team regarding email from Mr. Olsen re: planned enforcement.	0.3	0.3
7/2/2020	Telephone conference with Ms. Huppert re: drafting of reply brief.	0.7	0.7
7/2/2020	Review and analyze defendants' opposition; email litigation team and Ms. Huppert re: same.	1.3	1.3
7/3/2020	Review and analyze defendants' opposition; draft arguments for potential use in reply; email Ms. Huppert re: same.	4.1	4.1
7/3/2020	Analyze and review draft of potential argument for reply and email Ms. Huppert re: same.	0.6	0.6
7/4/2020	Research firm prediction rule and authority of federal court to interpret state law for reply brief.	2.9	2.9
7/5/2020	Review and revise draft of reply brief; email Ms. Huppert re: same.	4.5	4.5
7/6/2020	Review and revise draft of reply brief; email Ms. Huppert re: same.	1.3	1.3
7/6/2020	Telephone conference with Ms. Huppert re: revisions to reply brief.	0.5	0.5
7/6/2020	Draft agenda for weekly litigation call to discuss litigation updates and tasks.	0.3	0.3
7/6/2020	Telephone conference with litigation team to discuss litigation updates and tasks, including next steps after decision on pending motion for clarification.	0.6	0.6
7/7/2020	Review and revise draft of reply brief; email Ms. Huppert re: same.	1.1	1.1
7/7/2020	Telephone conference with Ms. Huppert re: revisions to reply brief.	0.2	0.2
7/8/2020	Telephone conference with Ms. Huppert re: oral argument on motion for clarification.	0.3	0.3
7/8/2020	Emails with Ms. Huppert and Ms. Cockerille re: oral argument on motion for clarification.	0.3	0.3
7/10/2020	Telephone conference with Ms. Huppert re: preparation for oral argument on motion for clarification.	0.5	0.5
7/13/2020	Draft agenda for weekly litigation call to discuss litigation updates and tasks.	0.2	0.2
7/13/2020	Telephone conference for weekly litigation call to discuss litigation updates and tasks, including preparation for moot.	0.2	0.2
7/20/2020	Review oral argument preparation materials from Ms. Huppert	1.8	1.8
7/20/2020	Prepare for moot with Ms. Huppert on motion for clarification regarding defendants' enforcement.	0.5	0.5
7/20/2020	Participate in moot with Ms. Huppert on motion for clarification regarding defendants' enforcement.	1.3	1.3
7/20/2020	Telephone conference with Ms. Huppert regarding preparation for hearing on motion for clarification regarding defendants' enforcement.	0.8	0.8
7/20/2020	Email Ms. Cockerille regarding hearing on motion for clarification regarding defendants' enforcement.	0.2	0.2
7/20/2020	Email with Covington team regarding hearing on motion for clarification regarding defendants' enforcement.	0.1	0.1
7/20/2020	Email with Ms. Huppert regarding hearing on motion for clarification regarding defendants' enforcement.	0.2	0.2
7/21/2020	Telephone conferences with Ms. Huppert re: hearing on motion for clarification.	0.3	0.3
7/21/2020	Email with litigation team re: changes to timing of hearing on motion for clarification.	0.2	0.2
7/21/2020	Email Ms. Huppert re: hearing on motion for clarification.	0.7	0.7
7/22/2020	Email Ms. Huppert re: hearing on motion for clarification.	0.3	0.3
7/22/2020	Review briefs in preparation for hearing on motion for clarification.	0.5	0.5

7/22/2020	Prepare for and attend hearing on motion for clarification.	1.5	1.5
7/22/2020	Telephone conference with Ms. Huppert re: hearing on motion for clarification.	0.2	0.2
7/22/2020	Telephone conference with Ms. Cockerille, Ms. Smith, and Mr. Lanosa re: hearing on motion for clarification.	0.3	0.3
7/22/2020	Email plaintiffs regarding hearing on motion for clarification.	0.3	0.3
7/27/2020	Review and revise first set of requests for production of documents.	0.9	0.9
7/27/2020	Email litigation team regarding weekly litigation tasks, including status of discovery requests.	0.3	0.3
7/27/2020	Review and respond to email from Ms. Ingelhart re: revisions to discovery requests.	0.2	0.2
7/28/2020	Telephone conference with Ms. Ingelhart re: discovery requests.	0.3	0.3
7/28/2020	Draft email to Mr. Lanosa regarding discovery requests.	0.5	0.5
7/31/2020	Telephone conference with Mr. Lanosa regarding revisions to discovery requests.	0.4	0.4
8/7/2020	Telephone conference with Ms. Huppert regarding responses to public records requests.	0.1	0.1
8/7/2020	Telephone conference with Ms. Huppert regarding order on motion for clarification.	0.2	0.2
8/7/2020	Review order on motion for clarification regarding defendants' enforcement plan.	0.6	0.6
8/7/2020	Emails with plaintiffs regarding order on motion for clarification.	0.6	0.6
8/9/2020	Research appealability of order granting clarification.	0.5	0.5
8/10/2020	Draft agenda for team call to discuss weekly litigation tasks.	0.2	0.2
8/10/2020	Telephone conference with litigation team to discuss weekly litigation tasks and status, including decision on motion for clarification.	0.9	0.9
8/10/2020	Draft and revise letter to Mr. Olsen re: compliance with injunction.	0.7	0.7
8/11/2020	Email Ms. Huppert, Ms. Ingelhart, and Ms. Farnsworth regarding defendants' compliance with injunction; review updated IDHW forms and compare with prior versions.	0.5	0.5
8/11/2020	Email with Ms. Cockerille and Covington team re: defendants' compliance with injunction.	0.3	0.3
8/11/2020	Email Mr. Olsen re: defendants' compliance with injunction.	0.1	0.1
8/12/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert re: potential expert testimony relevant to HB 509.	1	1
8/13/2020	Review edits to discovery requests from Ms. Ingelhart; email Ms. Ingelhart re: same.	0.5	0.5
8/13/2020	Telephone conference with Mr. Liu and Mr. Lanosa regarding discovery requests.	0.5	0.5
8/13/2020	Research regarding availability of discovery to oppose Rule 60(b)(5) motion and email Mr. Liu and Mr. Lanosa regarding same.	0.7	0.7
8/17/2020	Email litigation team regarding weekly team call to discuss timing of affirmative discovery.	0.1	0.1
8/17/2020	Analyze strategic considerations regarding timing of affirmative discovery.	0.4	0.4
8/17/2020	Telephone conference with litigation team to discuss timing of affirmative discovery.	0.9	0.9
8/17/2020	Telephone conference with Ms. Ingelhart and Ms. Huppert regarding revisions to discovery requests.	0.3	0.3
8/17/2020	Email Mr. Olsen regarding telephone conference to discuss case status.	0.2	0.2

8/19/2020	Prepare for call with Mr. Olsen to discuss case status and next steps.	0.4	0.4
8/19/2020	Telephone conference with Mr. Olsen to discuss case status and next steps, including potential motion practice.	0.4	0.4
8/19/2020	Telephone conference with Ms. Huppert regarding telephone conference with Mr. Olsen to discuss case status and next steps, including potential motion practice.	0.3	0.3
8/19/2020	Email litigation team with summary and analysis of telephone conference with Mr. Olsen to discuss case status and next steps, including potential motion practice.	0.4	0.4
8/24/2020	Email Mr. Liu and litigation team regarding next steps regarding discovery and potential further confirmatory email with Mr. Olsen.	0.5	0.5
8/24/2020	Telephone conference with litigation team for weekly call to discuss litigation tasks, including status of potential discovery.	0.3	0.3
8/24/2020	Email litigation team re: potential confirmatory email with Mr. Olsen following team call.	0.1	0.1
8/24/2020	Email Ms. Ingelhart regarding potential timing of defendant's forthcoming motion and status of potential expert.	0.2	0.2
11/30/2020	Draft email to Mr. Olsen regarding further stipulation on timing of fees motion.	0.4	0.4
11/30/2020	Draft email to litigation team regarding further stipulation on timing of fees motion.	0.3	0.3
11/30/2020	Respond to emails from Mr. Liu regarding options for further stipulation on timing of fees motion.	0.5	0.5
11/30/2020	Email Ms. Huppert regarding preparation for stipulation and order on timing of fees motion.	0.2	0.2
12/2/2020	Review and revise stipulation and order on timing of fees motion and email Ms. Huppert re: same.	0.7	0.7
12/14/2020	Review draft of expert testimony related materials potentially needed in litigation from Ms. Ingelhart.	0.5	0.5
12/14/2020	Email Ms. Ingelhart regarding draft of expert testimony related materials potentially needed in litigation and next steps.	0.4	0.4
12/14/2020	Telephone conference with litigation team re: expert testimony related materials potentially needed in litigation and next steps.	0.6	0.6
12/14/2020	Email litigation team re: follow-up Pavan research after team call.	0.1	0.1
2/8/2021	Compare current IDHW birth certificate gender marker change forms to prior iterations of same, and email litigation team regarding step to seek corrective action for further violations of the injunction.	1.5	1.5
2/9/2021	Emails with Ms. Cockerille, Ms. Ingelhart, and Covington team regarding corrective action for further violations of the injunction.	0.8	0.8
2/9/2021	Review and review draft letter to Mr. Olsen regarding corrective action for further violations of the injunction.	0.9	0.9
3/29/2021	Email plaintiffs update regarding case status and potential dissolution motion.	0.5	0.5
4/22/2021	Email Ms. Huppert and Ms. Ingelhart re: defendant's plans with respect to potential dissolution motion and outstanding issues related to fees.	0.3	0.3
4/23/2021	Email Ms. Smith re: defendant's plans with respect to potential dissolution motion and outstanding issues related to fees.	0.3	0.3
5/18/2021	Telephone conference with Ms. Huppert regarding strategy and task list for seeking attorneys' fees and costs.	0.8	0.8
5/27/2021	Telephone conference with Ms. Huppert regarding motion for attorneys' fees and costs.	0.3	0.3
6/2/2021	Analyze attorneys' fees issues raised by Ms. Huppert and email Ms. Huppert in response to same.	0.9	0.9
6/9/2021	Telephone conference with litigation team to discuss strategy re: attorneys' fees.	0.6	0.6
6/9/2021	Telephone conference with Ms. Smith re: client engagement letters for Hawley.	0.2	0
6/11/2021	Telephone conference with Ms. Huppert re: tasks and division of labor on fees motion.	1	1

6/11/2021	Email Los Angeles civil rights practitioner regarding potential declaration to validate local market rates.	0.3	0.3
6/11/2021	Conference with Los Angeles civil rights practitioner regarding potential declaration to validate local market rates.	0.3	0.3
6/12/2021	Research potential attorneys to validate Los Angeles rates.	0.5	0.5
6/12/2021	Email Ms. Huppert status of potential candidates to validate Los Angeles rates.	0.3	0.3
6/12/2021	Email Ms. Pizer regarding outreach to potential candidate to validate Los Angeles rates.	0.5	0.5
6/12/2021	Email Ms. Ingelhart regarding potential attorneys to validate Chicago rates.	0.4	0.4
6/14/2021	Email with Ms. Pizer regarding outreach to potential candidate to validate Los Angeles rates.	0.6	0.6
6/14/2021	Email with Ms. Huppert regarding time entries from Covington attorneys.	0.2	0.2
6/15/2021	Telephone conference with F.V. regarding case status update.	0.4	0.4
6/15/2021	Telephone conference with Ms. Huppert regarding revisions to stipulation and order on fees and costs.	0.4	0.4
6/15/2021	Revise stipulation and order on fees and costs and email Ms. Smith re: same.	0.4	0.4
6/16/2021	Telephone conference with Ms. Huppert regarding attorneys' fees and research assignments.	0.7	0.7
6/17/2021	Email with Ms. Cockerille regarding local attorney to validate forum rates in support of fees motion.	0.5	0.5
6/21/2021	Email with Ms. Cockerille regarding local attorney to validate forum rates in support of fees motion.	0.3	0.3
6/21/2021	Review exemplars of prior declarations from Mr. Stormer validating local rates.	0.5	0.5
6/22/2021	Email with Ms. Smith regarding stipulation and order on fees extension.	0.3	0.3
6/22/2021	Draft Stormer declaration based on information and materials provided by Mr. Stormer.	1.5	1.5
6/23/2021	Draft Stormer declaration based on information and materials provided by Mr. Stormer.	2.5	2.5
7/9/2021	Telephone conference with Ms. Huppert to discuss strategy and tasks re: seeking attorneys' fees.	0.3	0.3
7/9/2021	Telephone conference with litigation team to discuss strategy and tasks re: seeking attorneys' fees.	0.5	0.5
7/9/2021	Select relevant case law, declarations, and related materials to send to Ms. Smith to determine appropriate local rates for fees and email Ms. Smith re: same.	0.9	0.9
7/23/2021	Telephone conference with Ms. Huppert to discuss status of components for fees motion and potential negotiation with opposing counsel re: fees.	0.3	0.3
8/3/2021	Email Ms. Ingelhart regarding case law on hourly rates in Chicago.	0.3	0.3
8/3/2021	Review and revise draft letter regarding attorneys' fees to defendants.	1.8	1.8
8/4/2021	Telephone conference with Ms. Huppert to discuss revisions to draft letter regarding attorneys' fees to defendants.	1.2	0.6
8/4/2021	Review and revise further version of draft letter regarding attorneys' fees to defendants.	2.5	2.5
8/9/2021	Review and revise further version of draft letter regarding attorneys' fees to defendants, and email Ms. Huppert re: same.	0.6	0.6
8/30/2021	Email with Ms. Huppert regarding task list and internal schedule for fees motion.	0.3	0.3
8/30/2021	Telephone conference with litigation team to discuss state's counter-offer on fees and preparation of fees motion and supporting components.	1	1
8/30/2021	Finalize draft of declaration for Mr. Stormer to validate Los Angeles rates.	0.9	0.9

8/30/2021	Email Mr. Stormer regarding declaration to validate Los Angeles rates.	0.4	0.4
8/31/2021	Email with Ms. Huppert, Ms. Ingelhart, Ms. Smith, and Ms. Cockerille regarding declarations to validate rates in Boise and Chicago.	0.2	0.2
8/31/2021	Email with Mr. Lanosa regarding supporting factual information needed for fees motion.	0.2	0.2
9/1/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	3.6	3.6
9/1/2021	Review exemplars of relevant attorney declarations in support of fees motion for preparation of Renn declaration in support of fees motion.	0.7	0.7
9/2/2021	Email with Ms. Smith and Ms. Cockerille regarding declaration to validate Boise rates.	0.2	0.2
9/2/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	2.5	2.5
9/3/2021	Telephone conference with Ms. Huppert regarding rebuttal regarding points raised by Mr. Olsen's correspondence regarding attorneys' fees and responses to same.	0.6	0.6
9/3/2021	Draft summary of rebuttal regarding points raised by Mr. Olsen's correspondence regarding attorneys' fees and email same to Ms. Huppert.	0.8	0.8
9/3/2021	Telephone conference with Ms. Huppert regarding conversation with Mr. Olsen regarding attorneys' fees and next steps on motion.	0.2	0.2
9/3/2021	Email with Covington team regarding streamlining timekeepers for whom fees are sought based on correspondence from Mr. Olsen.	0.2	0.2
9/7/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	6.2	6.2
9/9/2021	Draft Renn declaration in support of fees motion, and review prior filings in support of same.	1.5	0
9/10/2021	Conduct legal research for attorneys' fees motion.	1.9	0
9/10/2021	Telephone conference with Ms. Ingelhart regarding declaration of Mr. Wysong.	0.7	0
9/10/2021	Telephone conference with Ms. Huppert regarding attorneys' fees motion and supporting declarations.	2	0
9/11/2021	Review and revise draft of Lloyd declaration regarding Boise hourly rates.	1.8	0.9
9/13/2021	Review and comment on draft outline of fees motion.	2.2	1.1
9/14/2021	Review and revise draft of Wysong declaration regarding Chicago rates; conduct research for same.	6.5	3
9/15/2021	Telephone conference with Ms. Ingelhart regarding Wysong declaration regarding Chicago rates.	0.5	0
9/16/2021	Draft Renn declaration in support of fees motion.	6	6
9/17/2021	Review draft of motion for attorneys' fees	0.8	0.8
9/17/2021	Email with Ms. Smith regarding revisions to declaration of Mr. Lloyd.	0.2	0.2
9/17/2021	Email with Ms. Ingelhart regarding revisions to declaration of Mr. Wysong.	0.1	0.1
9/17/2021	Telephone conference with Ms. Huppert regarding draft of motion for attorneys' fees.	0.6	0.6
9/17/2021	Revise draft of motion for attorneys' fees.	1.4	1.4
9/18/2021	Revise draft of motion for attorneys' fees.	1.3	1.3
9/19/2021	Revise draft of motion for attorneys' fees.	2.1	2.1
9/20/2021	Revise draft of motion for attorneys' fees and analyze case law cited in draft.	8.6	6
9/21/2021	Revise draft of motion for attorneys' fees.	9.1	6

9/22/2021	Revise draft of motion for attorneys' fees.	7.7	6
9/22/2021	Draft Renn declaration in support of fees motion.	0.9	0
9/22/2021	Email with Ms. Ingelhart regarding Chicago rates and Wysong declaration.	0.3	0.3
9/22/2021	Email plaintiffs re: case status update.	0.2	0.2
9/23/2021	Draft Renn declaration in support of fees motion.	2.5	2.5
9/24/2021	Review and approve all time entries for submission with fees motion, including to exercise billing judgment over same.	1.8	1.8
9/26/2021	Review and approve time entries for submission with fees motion, including to exercise billing judgment over same.	2.5	0
		Total:	396.6
		Total Time Billed Preparing Motion For Fees	77
		Total Amount Billed Preparing Motion For Fees	\$51,975.00
	F.V. v. Jeppesen Time Sheet for Attorney Nora Huppert		
Date	Description	Time Spent	Time Billed
3/20/2020	Telephone conference with Mr. Renn, Ms. Ingelhart, and Ms. Cockerille to discuss litigation tasks.	1	1
3/23/2020	Telephone conference with Mr. Renn, Ms. Ingelhart, and Ms. Cockerille to discuss tasks to prepare for litigation.	1.4	1.4
3/30/2020	Telephone conference with Mr. Renn, Ms. Ingelhart, and Ms. Cockerille to discuss tasks to prepare for litigation.	1	1
3/31/2020	telephone call with Mr. Renn to discuss dissolution research	0.3	0.3
3/31/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	2.8	2.8
4/1/2020	Telephone call with Mr. Renn to discuss research on 509	0.7	0.7
4/1/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	2.7	2.7
4/3/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	2.4	2.4
4/5/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	5	5
4/6/2020	Conduct research into possible avenues that might allow for enforcement of H.B. 509, including Rule 60(b) motion for dissolution	1.2	1.2
4/6/2020	Litigation team telephone meeting with Ms. Ingelhart, Mr. Renn, and Ms. Cockerille	1	1
4/6/2020	Telephone meeting with individual potentially harmed by HB 509, J-W	1	1
4/8/2020	Research into whether the re-enactment of an unconstitutional state law can ever justify dissolution under Rule 60(b)(5)	4.3	4.3
4/10/2020	Telephone call with Mr. Renn to discuss clarification research	0.5	0.5
4/10/2020	Weekly litigation team conference to discuss motion for clarification and division of labor	1	1
4/15/2020	Telephone call with individual potentially harmed by HB 509, Ms. B	1.3	1.3

4/17/2020	Litigation team conference to discuss division of labor regarding clarification research	0.9	0.9
4/23/2020	Conduct research into specific legal standard under Rule 60(b)(5)	1	1
4/27/2020	Telephone call with Mr. Renn to discuss dissolution research, potential opposition	0.4	0.4
4/29/2020	Conduct research into specific legal standard under Rule 60(b)(5)	3.6	3.6
5/4/2020	Research related to reply on motion for clarification, ripeness issues specifically	4.3	4.3
5/5/2020	Research related to reply on motion for clarification, ripeness issues specifically	6.4	6.4
5/5/2020	Outreach to people impacted by HB 509.	0.7	0.7
5/7/2020	Interview with impacted person D.B.	0.9	0.9
5/7/2020	reviewing PR's draft reply clarification	0.5	0.5
5/9/2020	Research for reply on clarification motion to rebut defendant's cited case law.	6.3	6.3
5/10/2020	Research related to reply on motion for clarification	6.1	6.1
5/11/2020	Telephone call with Mr. Renn and Ms. Ingelhart to discuss call with potential plaintiff KC	0.4	0.4
5/11/2020	Conference with litigation team to discuss motion for clarification, including moot for upcoming hearing.	0.9	0.9
5/11/2020	Call with impacted person K.C.	0.9	0.9
5/12/2020	Drafting public records requests	3	3
5/14/2020	research into inherent retention of jurisdiction to interpret injunction	4.8	4.8
5/15/2020	Drafting public records requests	3.9	3.9
5/15/2020	Moot for Peter Renn on oral argument on motion for clarification	1.2	1.2
5/19/2020	May 19th hearing on motion for clarification and team debrief	3	3
5/20/2020	Finalizing and transmitting public records requests	1.3	1.3
5/26/2020	Conference with litigation team to discuss clarification motion and fact issues related to challenging HB 509	1.1	1.1
5/29/2020	Telephone call with Mr. Renn and Ms. Ingelhart following up on call with Mr. Olsen re: public records requests	0.6	0.6
5/29/2020	Telephone call with Steve Olsen re: records request	0.6	0.6
6/1/2020	Litigation team conference to discuss tasks and division of labor, potential further avenues to prevent enforcement of HB 509.	0.9	0.9
6/1/2020	Review and analyze Order on Motion for Clarification	0.9	0.9
6/8/2020	Litigation team conference to discuss status and analyze decision on motion for clarification	0.8	0.8
6/9/2020	Prepare email to Steve Olsen regarding stipulation and proposed order to extend time to file a fees motion	0.4	0.4
6/9/2020	Prepare stipulation and proposed order to extend time on fees motion	1.4	1.4
6/17/2020	Telephone update with impacted individual K.C.	0.6	0.6
6/19/2020	Received and conducted preliminary review of public records in response to public records request re: HB509	1.5	1.5
6/20/2020	Telephone call with Mr. Renn re: public records request and potential second motion for clarification	0.7	0.7

6/22/2020	Further research related to reply on motion for clarification	0.4	0.4
6/22/2020	Litigation team conference to discuss public records and motion for clarification	0.4	0.4
6/24/2020	Conference with Mr. Renn and Ms. Ingelhart with J.H., re: potential expert testimony on justifications in opposition to potential motion for dissolution	1	1
6/24/2020	Call with impacted person P.R.	0.8	0.8
6/25/2020	Conducting comprehensive review of public records in response to public records request re: HB509	1.5	1.5
7/1/2020	Drafting reply to opposition to second motion for clarification	3	3
7/2/2020	Telephone conference with Mr. Renn to discuss strategy regarding reply to opposition to second motion for clarification	0.8	0.8
7/2/2020	Drafting reply to opposition to second motion for clarification	1.9	1.9
7/3/2020	Drafting reply to opposition to second motion for clarification	12.5	12.5
7/4/2020	Drafting reply to opposition to second motion for clarification	12.8	12.8
7/5/2020	Drafting reply to opposition to second motion for clarification	11.7	11.7
7/6/2020	Litigation team conference to discuss status and discuss upcoming decision on second motion for clarification, possible strategic responses.	0.9	0.9
7/7/2020	Drafting reply to opposition to second motion for clarification	7.1	7.1
7/8/2020	Email correspondence arranging a time for hearing on second motion for clarification	1.1	0.1
7/10/2020	Call with Mr. Renn re: prep oral argument on 2nd motion for clarification	0.5	0.5
7/10/2020	Conducting comprehensive review of public records in response to public records request re: HB509	2.9	2.9
7/13/2020	Litigation team conference to discuss tasks and division of labor including moot in advance of upcoming hearing on second motion for clarification	0.4	0.4
7/15/2020	Conducting comprehensive review of public records in response to public records request re: HB509	2.9	2.9
7/17/2020	Preparing for hearing on second motion for clarification	12.9	12.9
7/18/2020	Preparing for hearing on second motion for clarification	11	11
7/19/2020	Preparing for hearing on second motion for clarification	9.1	9.1
7/20/2020	Preparing for hearing on second motion for clarification	8.1	8.1
7/20/2020	Mooting hearing on second motion for clarification	1.4	1.4
7/22/2020	Hearing on second motion for clarification and team debrief	2.2	2.2
8/7/2020	Call with Mr. Renn re: public records requests	0.1	0.1
8/7/2020	Call with Mr. Renn re: order on 2nd motion for clarification	0.2	0.2
8/10/2020	Litigation team conference to discuss decision on second motion for clarification, tasks and division of labor in response	0.9	0.9
8/12/2020	Telephone meeting with Ms. Ingelhart and Mr. Renn regarding potential expert testimony	1	1
8/17/2020	Telephone call with Mr. Renn and Ms. Ingelhart regarding discovery requests	0.3	0.3
8/19/2020	Telephone call with Mr. Renn regarding phone call with Mr. Olsen	0.3	0.3
8/24/2020	Litigation team conference to discuss potential discovery issues	0.3	0.3

5/18/2021	Telephone call with Mr. Renn regarding attorneys fee stipulation and deadline, potential motion for fees and costs	0.8	0.8
6/9/2021	Telephone call with litigation team re: recovering attorneys' fees	0.6	0.6
6/11/2021	Phone conference with Mr. Renn to discuss drafting and research of declarations in support of motion for attorneys' fees	1	1
6/18/2021	Analyze intern research regarding legal issues in motion for attorneys' fees	0.4	0.4
6/21/2021	Collating time entries for fees motion	2.9	1.5
6/22/2021	Research for fees motion	4.6	4.6
7/9/2021	Phone call with Mr. Renn to discuss motion for attorneys' fees tasks	0.3	0.3
7/9/2021	Litigation team conference to discuss upcoming tasks related to motion for attorneys' fees and division of labor	0.5	0.5
7/14/2021	Research related to motion for attorney's fees, out-of-forum rates	3.4	3.4
7/19/2021	Research related to motion for attorney's fees, out-of-forum rates	6	6
7/22/2021	Organizing time entries for fees motion	1.8	0.9
7/23/2021	Phone call with Mr. Renn to discuss fees motion research and potential negotiation	0.3	0.3
7/26/2021	Research and drafting attorneys' fees motion	2.7	2.7
7/27/2021	Collating time entries for fees motion	3.3	1.7
7/28/2021	Drafting letter to opposing counsel re: negotiating attorneys' fees	2.8	2.8
7/29/2021	Drafting letter to opposing counsel re: negotiating attorneys' fees	2.9	2.9
8/4/2021	Revising letter to opposing counsel re: negotiating attorney's fees	3.6	3.6
8/4/2021	Telephone call with Mr. Renn regarding revisions to letter Defendants regarding attorneys' fees	1.2	0.6
8/8/2021	Finalizing draft of letter to Defendants regarding attorneys' fees	0.3	0.3
8/9/2021	Transmitting letter to Defendants' regarding attorneys' fees and potential negotiation as to fees	0.2	0.2
8/25/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.1	0.1
8/30/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.1	0.1
8/30/2021	Telephone conference with litigation team regarding upcoming division of labor re: motion for attorneys' fees	1	1
8/30/2021	Litigation team conference to discuss state's response to proposed settlement of fees and further preparation of attorneys' fees motion	1	1
8/31/2021	Email with Mr. Renn and Ms. Ingelhart regarding Stormer Declaration	0.1	0.1
9/1/2021	Email with Mr. Renn regarding collection of time entries for attorneys' fee motion	0.1	0.1
9/2/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.1	0.1
9/3/2021	Telephone call with Mr. Olsen regarding attorneys' fees letter	0.2	0.2
9/3/2021	Telephone meeting with Mr. Renn regarding upcoming telephone call with Mr. Olsen regarding attorneys' fees letter	0.6	0.6
9/3/2021	Telephone meeting with Mr. Renn regarding second telephone conversation with Mr. Olsen regarding attorneys' fees and next steps on motion.	0.2	0.2

3/26/2020	Email update to F.V. litigation team; Email communication with AC re other potential expert witnesses; follow-up communication with impacted individual EJ.	0.5	0.5
3/27/2020	Email update to F.V. litigation team regarding communication with persons impacted by HB 509 and I potential experts.	0.3	0.3
3/30/2020	Telephone conference with F.V. litigation team re: litigation tasks.	1	1
3/30/2020	Telephone call with potential expert AC.	0.5	0.5
3/30/2020	Research persons and organizations impacted by HB509.	1.5	1.5
3/31/2020	Follow-up with co-counsel MC, potential expert AC, HB509-impacted individual OJW; research persons and orgs impacted by HB509.	3.2	3.2
4/1/2020	Telephone conference w Peter Renn re: statutory interpretation of HB509 and dissolution motion	0.4	0.4
4/1/2020	Email correspondence with organization in potential contact with impacted persons; Review Lambda help desk inquiries regarding HB 509.	2.5	2.5
4/2/2020	Email correspondence with and research regarding correspondence with organization in potential contact with impacted persons	2	2
4/3/2020	Email correspondence with persons and organizations impacted by HB509.	0.6	0.6
4/6/2020	Telephone conference with Mr. Renn, Ms. Huppert, and Ms. Cockerille re: HB509 litigation tasks.	1.5	1.5
4/6/2020	Telephone conference with individual impacted by HB509 OJW.	1	1
4/6/2020	Telephone conference with Mr. Renn and Ms. Huppert re: communication with OJW.	0.3	0.3
4/6/2020	Draft interview questions for HB509-impacted individuals and organizations.	1	1
4/6/2020	Review Lambda Legal help desk intakes regarding HB509.	1	1
4/7/2020	Telephone conference with Mr. Renn re: potential Covington co-counsel	0.3	0
4/7/2020	Telephone conference with potential Covington co-counsel.	0.7	0
4/8/2020	Telephone conference with potential Covington co-counsel.	0.3	0
4/9/2020	Telephone conference with potential experts AC and NAPHSIS.	1	1
4/9/2020	Email update to F.V. litigation team re communication with potential experts.	0.2	0.2
4/9/2020	Review HB509 legislative justifications	0.5	0.5
4/10/2020	Responsive email to co-counsel Covington	0.2	0
4/10/2020	Email correspondence follow-up with Help Desk attorney re HB509 inquiries	0.3	0.3
4/10/2020	HB509 legislative justifications research	0.8	0.8
4/10/2020	Assemble documents for co-counsel Covington	0.2	0
4/10/2020	Telephone conference with litigation team regarding HB509 litigation tasks.	0.5	0
4/13/2020	Telephone conference with HB509-impacted person LB.	1	1
4/14/2020	Follow-up emails to retainer communications with clients; scheduling follow-up communication with LB over emails	0.3	0.3
4/14/2020	Review draft motion for clarification.	0.7	0.7
4/14/2020	Telephone conference with client F.V. re retainer.	0.3	0

4/15/2020	Research re potential expert witness.	0.7	0.7
4/15/2020	Telephone conference with LB and Peter Renn	1.3	1.3
4/15/2020	Research re potential expert witness.	0.7	0.7
4/17/2020	Email correspondence with Covington co-counsel sharing related Tennessee matter public filings and short summary.	0.1	0
4/17/2020	Weekly litigation call to discuss litigation tasks, status, and division of labor.	0.9	0.9
4/23/2020	Email correspondence with Mr. Renn re HB 509 justifications	0.2	0.2
4/24/2020	Draft case proof chart.	2.5	2.5
4/27/2020	Attend weekly litigation team meeting regarding litigation tasks and status	1	1
4/27/2020	Research re HB 509 legislative justification and potential expert witness	1.5	1.5
4/27/2020	Telephone conference with Peter Renn re HB509-impacted individuals.	0.2	0.2
4/29/2020	Telephone conference with HB509-impacted person OJW.	0.8	0.8
4/29/2020	Telephone conference with HB509-impacted person LB.	0.8	0.8
4/30/2020	Telephone conference with HB509-impacted person LB.	1	1
5/1/2020	Telephone conference with HB509-impacted person OJW.	0.5	0.5
5/4/2020	Telephone conference with HB509-impacted person OJW.	0.5	0.5
5/5/2020	Email correspondence with HB-509 impacted individuals.	0.5	0.5
5/6/2020	Email correspondence with HB-509 impacted individuals.	0.2	0.2
5/7/2020	Telephone conference with HB509-impacted person DB.	1	1
5/7/2020	Telephone conference with HB509-impacted person DS.	1	1
5/7/2020	Email with Mr. Renn re HB509-impacted individuals' facts	0.2	0.2
5/8/2020	Review reply brief in support of motion for clarification.	1	1
5/8/2020	Email correspondence with Nora Huppert and Peter Renn re HB509-impacted individuals.	0.5	0.5
5/11/2020	Attend weekly litigation team meeting regarding litigation tasks and status	1.1	1.1
5/11/2020	Telephone conference with Peter Renn and Nora Huppert re HB509-impacted individual	0.4	0.4
5/11/2020	Schedule follow-up meeting with potential expert NAPHSIS follow-up and related potential expert research	0.7	0.7
5/11/2020	Telephone conference with Nora Huppert and HB509-impacted person K.	1	1
5/12/2020	Review Lambda Legal help desk intakes regarding HB509.	0.2	0.2
5/12/2020	Telephone conference with HB509-impacted individual EJ.	0.8	0.8
5/12/2020	Potential expert NAPHSIS summary draft for litigation team	0.5	0.5
5/15/2020	Participate in moot on motion for clarification	1.5	1.5
5/15/2020	Prepare to participate in moot on motion for clarification.	1.2	1.2

5/18/2020	Telephone conference with litigation team to discuss weekly tasks	1	1
5/18/2020	Follow-up email correspondence with potential expert NAPHSIS.	0.2	0.2
5/19/2020	Attend hearing on motion for clarification.	2	2
5/20/2020	Email communication with HB509-impacted individuals and organizations.	0.5	0.5
5/21/2020	Email correspondence to HB509-impacted person LB.	0.2	0.2
5/21/2020	Email correspondence to HB509-impacted person LG.	0.1	0.1
5/22/2020	Telephone conference with LG from HB509-impacted organization ID PFLAG.	1.5	1.5
5/26/2020	Telephone conference with potential expert JS.	1	1
5/26/2020	Attend weekly litigation team meeting regarding litigation tasks and status	1.1	1.1
5/26/2020	Telephone conference with potential expert SW.	1	1
5/26/2020	Research re potential expert witness.	1.4	1.4
5/29/2020	Research re potential expert witness.	0.9	0.9
5/29/2020	Telephone conference with Steve Olsen re records request.	0.4	0.4
5/29/2020	Telephone conference with Peter Renn and Nora Huppert re conference with SO re records request.	0.6	0.6
6/1/2020	Research re potential expert witness.	1.7	1.7
6/1/2020	Weekly litigation call to discuss tasks, status, and division of labor.	1	1
6/1/2020	Telephone conference with potential expert CMW	0.5	0.5
6/1/2020	Review order on Motion for Clarification	0.5	0.5
6/2/2020	Telephone conference with HB509-impacted person LB.	0.3	0.3
6/2/2020	Telephone conference with HB509-impacted organization OUPD.	0.5	0.5
6/4/2020	Email correspondence with HB-509 impacted organization Moscow PFLAG	0.2	0.2
6/8/2020	Weekly litigation call to discuss tasks, status, and division of labor.	1	1
6/8/2020	Telephone conference with Peter Renn re potential expert and research.		0
6/10/2020	Email correspondence with potential expert JH.	0.2	0.2
6/12/2020	Research re potential expert witness.	1	1
6/15/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	0.4	0.4
6/15/2020	Email correspondence with potential expert JH.	0.1	0.1
6/16/2020	Email correspondence with potential expert GS.	0.3	0.3
6/18/2020	Review Lambda Legal help desk intakes regarding HB509.	0.2	0.2
6/19/2020	Email correspondence with Peter Renn and Nora Huppert re public records request.	0.2	0.2
6/22/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	1	1

6/22/2020	Review motion regarding Defendants' enforcement of HB509 plan.	0.7	0.7
6/23/2020	Telephone conference with Peter Renn re potential expert and research.	0.5	0.5
6/24/2020	Telephone conference with Peter Renn re oral argument and motion for clarification.	0.2	0.2
6/25/2020	Preparation for meeting with potential expert JH.	0.5	0.5
6/26/2020	Telephone conference with potential expert JH.	1	1
6/26/2020	Telephone conference with Peter Renn re potential expert JH.	0.4	0.4
6/26/2020	Draft of brief in opposition to expected motion to dissolve F.V. permanent injunction.	1.5	1
6/29/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	0.5	0.5
6/29/2020	Email correspondence with Peter Renn re potential expert JH.	0.2	0.2
6/29/2020	Email correspondence with potential expert SL.	0.3	0.3
7/6/2020	Review reply in support of motion regarding Defendants' enforcement of HB509 plan.	0.5	0.5
7/6/2020	Weekly litigation team meeting to discuss tasks, status, and division of labor.	1	1
7/6/2020	Telephone conference with potential expert SL.	0.5	0.5
7/7/2020	Email correspondence with potential expert BD.	0.5	0.5
7/8/2020	Research re potential expert witness.	0.5	0.5
7/13/2020	Telephone conference with potential expert BD.	0.2	0.2
7/16/2020	Telephone conference with potential expert BD.	0.5	0.5
7/22/2020	Attend hearing on motion for clarification.	1.5	1.5
7/22/2020	Review litigation team email correspondence re hearing on motion for clarification.	0.5	0.5
7/27/2020	Review drafted RFPs and share edits in email correspondence with Peter Renn and Nora Huppert	0.8	0.8
7/28/2020	Telephone conference with Peter Renn re RFPs.	0.3	0.3
8/10/2020	Weekly litigation team meeting.	1	1
8/10/2020	Email correspondence with potential expert BD.	0.2	0.2
8/12/2020	Telephone conference with Peter Renn and Nora Huppert re potential expert.	1	1
8/12/2020	Research re potential expert witness.	0.5	0.5
8/13/2020	Edit RFPs and email correspondence to Nora Huppert and Peter Renn re same.	0.3	0.3
8/13/2020	Research regarding existing ID code/regulations re amendments to BCs.	0.3	0.3
8/13/2020	Draft definitions for RFPs.	0.5	0.5
8/17/2020	Weekly litigation team meeting.	0.9	0.9
8/17/2020	Telephone conference with Nora Huppert and Peter Renn re RFPs.	0.3	0.3
10/13/2020	Draft issues for potential expert report and supporting documents.	0.2	0

10/16/2020	Draft issues for potential expert report and supporting documents.	3	1.5
12/14/2020	Draft issues for potential expert report and supporting documents and email correspondence with Nora Huppert and Peter Renn re same.	4	2
2/9/2021	Review draft letter to Steve Olsen re violations of injunction.	0.2	0.2
3/3/2021	Email correspondence to NCTE update website regarding decision to advise public.	0.2	0
6/9/2021	Attend portion of litigation team meeting re fees.	0.3	0.3
6/14/2021	Email outreach to Chicago civil rights litigator colleagues re hourly rates.	1	1
7/9/2021	Litigation team call re fee motion	0.5	0.5
7/15/2021	Review Chicago rate fee research.	1	1
8/2/2021	Review Chicago rate fee research.	1	1
8/3/2021	Research re Chicago civil rights attorney hourly rates.	0.5	0.5
8/30/2021	Litigation team call re fee counter and motion	1	1
8/31/2021	Email correspondence with Chicago rate validator Charlie Wysong.	0.2	0.2
8/31/2021	Email correspondence with Peter Renn and Nora Huppert re Chicago rate validator.	0.2	0.2
9/2/2021	Telephone conference with Chicago attorney Charlie Wysong re declaration.	0.2	0.2
9/2/2021	Draft Wysong declaration.	0.5	0.5
9/3/2021	Draft Wysong declaration.	0.5	0.5
9/7/2021	Review email summary re Nora Huppert and Steve Olsen telephone conference regarding fees and respond re same.	0.2	0.2
9/8/2021	Draft Wysong declaration.	1.5	1.5
9/9/2021	Draft Wysong declaration.	1.5	1.5
9/10/2021	Telephone conference with Peter Renn re Wysong declaration.	0.7	0
9/10/2021	Telephone conference with Charlie Wysong re: declaration	0.1	0.1
9/10/2021	Draft Wysong declaration.	1	1
9/15/2021	Telephone conference with Peter Renn re Wysong declaration.	0.5	0.5
9/15/2021	Draft Wysong declaration.	0.7	0.7
9/16/2021	Email correspondence with Peter Renn and Nora Huppert re resumes/supporting documents for fee petition.	0.1	0.1
9/20/2021	Incorporate Nora Huppert and Peter Renn edits to Wysong declaration.	0.5	0.5
9/21/2021	Telephone conference with Charlie Wysong re declaration.	0.3	0.3
9/21/2021	Telephone conference with Peter Renn re Wysong declaration.	0.2	0
9/22/2021	Telephone conference with Charlie Wysong re declaration.	0.2	0.2
9/22/2021	Incorporate Charlie Wysong edits to declaration.	1	1
9/23/2021	Incorporate Peter Renn edits to Wysong declaration.	0.4	0.4

9/25/2021	Review draft motion for attorneys fees.	0.5	0
		Total:	109.6
		Total Time Billed Preparing Motion For Fees	14.9
		Total Amount Billed Preparing Motion For Fees	\$4,917.00
	F.V. v. Jeppesen Time Sheet for Attorney Monica Cockerille		
Date	Description	Time Spent	Time Billed
3/23/2020	Call with Lambda team to discuss proposed legislation to overturn F.V. injunction and potential litigation	1	1
3/30/2020	Call with Lambda team to discuss proposed legislation to overturn F.V. injunction and potential litigation	1	1
4/6/2020	Review various emails in preparation for call to discuss passage of HB 509; telephone conference with Lambda team on next steps for drafting legal action	2.5	2.5
4/7/2020	Review of research on new complaint as a vehicle to challenge legislation to overturn F.V. injunction	1	1
4/8/2020	Email on public records request for HB 509	0.1	0.1
4/9/2020	Research on new complaint as vehicle to challenge legislation to overturn F.V. injunction	1.2	1.2
4/10/2020	Work on draft of potential new complaint to challenge HB 509	1.3	1.3
4/14/2020	Telephone conference with Peter Renn on motion to shorten time for clarification and other issues	0.2	0.2
4/15/2020	Review and revise motion to shorten time; review motion for clarification; review memorandum on clarification; email revisions to Peter Renn re: same	0.9	0.9
4/16/2020	Prepare final documents for filing; file same; further email on meet and confer on motion to shorten time	1	1
4/17/2020	Telephone conference with team to discuss status of motion for clarification and division of labor on other potential avenues re: HB 509	0.9	0.9
5/8/2020	Review reply to response on motion for clarification	1	1
5/11/2020	Telephone conference with Peter Renn regarding potential timing of filings in new action if required.	0.5	0.5
5/11/2020	Telephone conference to attend part of call with team regarding status of litigation tasks	0.1	0.1
5/15/2020	Telephone conference on mooted argument on motion for clarification	1.4	1.4
5/18/2020	Weekly telephone conference with team on litigation task status on challenging HB 509	1	1
5/19/2020	Court hearing on motion for clarification	2.1	2.1
6/1/2020	Telephone conference with team on status of litigation tasks in challenge to HB 509	1	1
6/15/2020	Weekly telephone call to discuss status of litigation tasks in challenge to HB 509	0.6	0.6
6/17/2020	Review letter to Steve Olsen regarding plan to enforce HB 509 and email on next steps; email replying to same	0.3	0.3
6/18/2020	Telephone conference with Peter Renn regarding notice to Defendants of request for status conference	0.2	0.2
6/22/2020	Review and revise briefing on second motion for clarification; telephone conference with team on status	1	1

6/29/2020	telephone conference with team to discuss status of second motion for clarification	0.6	0.6
7/20/2020	Telephone conference with team in preparation for hearing on second motion for clarification	1.3	1.3
7/22/2020	Court hearing on second motion for clarification	1.3	1.3
7/22/2020	Telephone conference with Peter Renn, Mr. Lanosa, and Ms. Smith re: hearing on motion	0.3	0.3
8/3/2020	Email on First Set of Requests for Production	0.1	0.1
8/7/2020	Email on Court's decision on second motion for clarification	0.1	0.1
8/10/2020	Telephone conference with team on Decision on Motion for Clarification and Discovery Requests in preparation to oppose Rule 60(b)(5) Motion	0.3	0.3
8/17/2020	Email on Discovery to oppose Rule 60(b)(5) Motion	0.1	0.1
9/9/2020	Email on F.V. deadline to appeal court's August 7th decision on clarification	0.2	0.2
12/14/2020	Review of Expert Report Discussed on 12/14 Call concerning opposition to Rule 60(b)(5) Motion	0.2	0.2
12/17/2020	Review of Birth Certificate Litigation Victory in Ohio	0.1	0.1
2/10/2021	Emails on the Violation of the Injunction by Idaho	0.1	0.1
2/14/2021	Emails on Demand Letter to Steven Olsen	0.1	0.1
2/24/2021	Emails on Response from Steve Olsen re: Demand Letter	0.2	0.2
3/3/2021	Emails on Withdrawal of Appearance in F.V. Matter re: Isaac Belfer	0.1	0.1
3/11/2021	Filing of Belfer Withdrawal	0.1	0.1
4/2/2021	Emails with Mr. Renn and others on defendants' non-compliance with injunction through February 2021	0.1	0.1
6/1/2021	Emails on Conflict Waiver re: Colleen Smith	0.1	0.1
6/9/2021	Telephone conference with team on attorneys' fees motion	0.5	0.5
6/14/2021	Various emails with team relating to fees motion, declarations as to Boise rates and other rates; reply to same; further email on time, email and contact for declaration for Boise rates	0.2	0.2
6/17/2021	Email with Nora Huppert re: declaration for Boise rates; Review and compile time entries and send to Nora	0.2	0.2
6/18/2021	Review and revise resume; send same to Nora Huppert for fees motion; telephone conference with Tom Lloyd re: declaration on Boise rates; email to Nora Huppert and Peter Renn re: same	0.4	0.4
7/23/2021	Review various emails regarding time entries and regarding July 9 call relating to time and declarations in support of fees	0.1	0.1
8/8/2021	Review various email with Steve Olsen and email from Peter and team relating to good faith effort to resolve fees motion with state; reply with comments on letter to Steve	0.2	0.2
8/30/2021	Telephone conference with litigation team to discuss government offer on fees and fees motion.	1	1
8/30/2021	email with Tom Lloyd on declaration in support of motion	0.1	0.1
9/2/2021	Review response from government to fees offer; further email with Colleen Smith re: Tom Lloyd declaration; further communication with Tom Lloyd; further email with Nora Huppert and team	0.2	0.2
9/9/2021	Email with Peter Renn and litigation team on response to government and thoughts on mediation; reply to same	0.1	0.1
9/16/2021	Email with Colleen Smith re: Tom Lloyd declaration; review and revise declaration and send comments to Colleen	0.3	0.3

9/23/2021	Review and revise memorandum in support of attorneys' fees motion	0.4	0.4
9/26/2021	Review Renn declaration in support of motion for fees; respond with comments and edits	0.3	0.3
		Total:	29.7
		Total Time Billed Preparing Motion For Fees	3.8
		Total Amount Billed Preparing Motion For Fees	\$1,558.00
	F.V. v. Jeppesen Time Sheet for Attorney Colleen Smith		
Date	Description	Time Spent	Time Billed
4/7/2020	Email communications with Covington team regarding initial steps in HB 509 challenge.	0.1	0.1
4/8/2020	Draft engagement letters for potential new clients in Idaho HB 509 litigation.	2.4	0
4/9/2020	Draft and circulate email to team regarding draft engagement letter for potential new clients.	0.2	0
4/9/2020	Review email communications regarding scope of co-counsel agreement.	0.1	0
4/10/2020	Participate in Covington-Lambda Legal team meeting regarding overall litigation strategy.	1.1	1.1
4/10/2020	Email communications regarding Covington team litigation strategy meeting on HB 509 challenge.	0.1	0.1
4/10/2020	Review meeting agenda and prepare for Covington-Lambda Legal litigation strategy meeting.	0.2	0.2
4/10/2020	Review and analyze Idaho case law on requests for preliminary injunctions.	1	0
4/13/2020	Review and analyze Lambda Legal's notes on HB 509.	0.3	0.3
4/13/2020	Review and analyze Idaho Attorney General's letter regarding constitutionality of HB 509.	0.5	0.5
4/13/2020	Review and analyze Judgment and permanent injunction the Court entered in F.V. v. Barron.	0.3	0
4/13/2020	Draft and circulate summary to Henry Liu regarding background materials re: re: F.V. v. Barron and HB 509	0.5	0
4/14/2020	Meet with Henry Liu to discuss motion for clarification and next steps to assist with Idaho HB 509 challenge.	0.2	0.2
4/14/2020	Review motion for clarification, memorandum in support, and motion for abbreviated briefing schedule and draft comments regarding the same.	1.8	1.8
4/15/2020	Review and edit Henry Liu's comments on motion for clarification and circulate comments to Lambda Legal.	0.4	0.4
4/16/2020	Review and analyze interview notes from Lambda.	0.5	0
4/17/2020	Review audio and video files from House and Senate hearings on HB 509, draft list of relevant clips from each file, and submit request for creation of transcripts for relevant clips.	0.8	0.8
4/17/2020	Participate in team strategy meeting with Lambda Legal.	0.9	0.9
4/17/2020	Draft and circulate notes from meeting with Lambda Legal to Covington team.	0.5	0
4/17/2020	Review and analyze March 2, 2020 Senate State Affairs Committee meeting on alternative to HB 509.	0.4	0.4

4/17/2020	Review and analyze February 13, 2020 House State Affairs meeting minutes on HB 509.	0.3	0.3
4/17/2020	Review and analyze February 21, 2020 House State Affairs Meeting on HB 509.	2.2	2.2
4/18/2020	Review and analyze House floor debate and vote on HB 509.	0.9	0.9
4/18/2020	Review and analyze Senate State Affairs Committee meeting on HB 509.	1.6	1.6
4/22/2020	Participate in call with Mike Lanosa and Isaac Belfer regarding background of Idaho HB 509 challenge.	0.5	0.4
4/27/2020	Review and analyze complaint filed in Hecox v. Little.	0.5	0
4/28/2020	Review and analyze case law and draft outline of the same regarding likelihood of success on the merits of equal protection claim challenging HB 509.	4.3	2.1
4/29/2020	Review and analyze transcripts of Senate and House hearings on HB 509 and create outline of governmental reasons given for passing HB 509.	5.4	5.4
4/30/2020	Review and analyze strength of governmental reasons given for passing HB 509.	2.6	2.6
4/30/2020	Review and analyze case law regarding transgender bathroom bans and add analysis to merits briefing outline.	2.4	2.4
4/30/2020	Review and analyze case law cited in HB 509 and add analysis to merits briefing outline.	0.3	0
5/1/2020	Revise merits briefing outline.	1.7	1.7
5/1/2020	Review and analyze case law regarding burden of proof issues relevant to HB 509 challenge.	2.9	2.9
5/1/2020	Review and analyze legal standards for preliminary injunction and dissolution of permanent injunction and add to merits briefing outline.	1.5	0
5/2/2020	Review and analyze Defendants' opposition to motion for clarification and draft summary regarding the same.	0.4	0.4
5/4/2020	Participate in Covington team meeting regarding merits briefing outline and case strategy.	0.7	0.7
5/4/2020	Meet with Mike Lanosa to discuss division of research on merits briefing issues.	0.2	0.2
5/5/2020	Review and analyze academic literature for statistical information on transgender populations.	3.8	3.8
5/5/2020	Review and analyze case law regarding Idaho law re: impact on pending applications when law takes effect.	0.6	0.6
5/5/2020	Revise merits briefing outline.	1.5	1.5
5/7/2020	Meet with Henry Liu to discuss edits to reply in support of motion for clarification.	0.1	0.1
5/7/2020	Review, analyze, and edit reply in support of motion for clarification.	1.7	1.7
5/7/2020	Add additional edits to reply in support of motion for clarification based on discussion with Henry Liu.	1.1	1.1
5/8/2020	Review and analyze transgender birth certificate cases pending in other jurisdiction and other cases that have cited the decisions issued in those cases.	2.7	1.2
5/8/2020	Review and analyze case law regarding government interest in enforcing private contracts or policies.	1.1	1.1
5/8/2020	Review and analyze Idaho statutes requiring individuals to present a birth certificate.	0.5	0.5
5/8/2020	Review and analyze case law regarding level of scrutiny to be used in evaluating government interest.	1.7	0
5/12/2020	Review and analyze case law on First Amendment compelled speech claim.	2.6	0
5/12/2020	Research and analyze requirements for associational and third-party standing.	1.6	1.6
5/12/2020	Research and analyze case law regarding irreparable harm when plaintiff has third-party or associational standing.	2.2	2.2
5/13/2020	Draft questions for moot oral argument on motion for clarification.	1	1

5/13/2020	Review and analyze final draft of reply in support of motion for clarification.	0.5	0.5
5/13/2020	Review and analyze supplementary research regarding preliminary injunction.	0.3	0.3
5/13/2020	Review and analyze case law on First Amendment compelled speech claim.	1.6	0
5/13/2020	Review, analyze, and edit draft public record requests addressed to House and Senate State Affairs Committees, Governor Little, Representative Young, and the Legislative Services Office.	2.5	2.5
5/14/2020	Review and analyze District of Idaho case law regarding irreparable harm and infringement of constitutional rights issue and draft summary regarding the same.	1.5	1.5
5/14/2020	Review and analyze case law on First Amendment compelled speech claim.	1.4	0
5/14/2020	Research and analyze federal and state laws and regulations requiring the presentation of a birth certificate to obtain a license or service.	2.4	2.4
5/14/2020	Draft and circulate email to Lambda Legal regarding edits to public records requests.	0.2	0.2
5/15/2020	Participate in moot of motion for clarification.	1.5	1.5
5/18/2020	Review and revise analysis of First Amendment claim in merits briefing outline.	1.6	0
5/19/2020	Participate in debrief of oral argument on motion for clarification.	0.4	0.4
5/19/2020	Review and analyze case law on transgender issues and their intersection with First Amendment law.	2.3	0
5/20/2020	Review and analyze case law in support of due process claim and begin drafting outline of the same.	3.6	0
5/22/2020	Review and analyze case law on due process claim and update merits briefing outline on the same.	3.5	0
6/1/2020	Review and analyze William Isasi's comments on merits briefing outline.	0.4	0.4
6/9/2020	Review case law and draft memorandum regarding availability of post-judgment discovery.	4.8	4.8
6/10/2020	Draft and circulate email to team regarding memorandum about post-judgment discovery and plan to monitor Idaho Department of Health and Welfare's enforcement of HB 509.	0.2	0.2
6/17/2020	Review and analyze email communications and draft letter to opposing counsel regarding enforcement of HB 509.	0.5	0.5
6/22/2020	Review and edit second motion for clarification.	1.6	1.6
6/24/2020	Review and analyze court order regarding briefing schedule on motion for clarification.	0.1	0.1
6/30/2020	Review and analyze email communication from Steve Olson regarding Defendant's next course of action and proposed response.	0.1	0.1
7/6/2020	Review and analyze changes to application to request gender change on birth certificate.	0.3	0.3
7/6/2020	Review analyze opposition to and draft reply in support of motion for clarification.	1	1
7/6/2020	Meet with Isaac Belfer to discuss affirmative discovery requests.	0.1	0.1
7/13/2020	Draft first set of requests for production.	2.1	2.1
7/20/2020	Prepare for practice moot in preparation for oral argument on motion for clarification.	0.5	0.5
7/20/2020	Participate in practice moot in preparation for oral argument on motion for clarification.	1.2	1.2
7/22/2020	Telephone conference with Mr. Renn, Mr. Lanosa, and Ms. Cockerille re: hearing on motion for clarification.	0.3	0
1/6/2021	Review and analyze outline of expected arguments in support of and in opposition to forthcoming motion and draft expert report.	1	1

1/8/2021	Participate in meeting to discuss strategy and other evidence needed to defend against defendants' anticipated motion.	0.6	0.6
1/8/2021	Review and analyze draft report and outline of arguments and evidence expected to be presented in defendants' forthcoming motion.	1.1	1.1
2/9/2021	Draft letter to Steve Olsen regarding injunction violation.	1.7	1.7
2/9/2021	Prepare exhibits to accompany letter regarding injunction violation.	0.3	0.3
2/10/2021	Review and analyze response email from Steve Olsen. Draft reply and circulate to team for review.	0.4	0.4
2/10/2021	Draft and send email to Steve Olsen regarding injunction violation attaching demand letter.	0.3	0.3
2/11/2021	Revise and send email to Steve Olsen regarding injunction violation.	0.1	0.1
2/12/2021	Meet with Steve Olsen to discuss Defendants' investigation into injunction violation.	0.2	0.2
2/22/2021	Draft and circulate email analyzing letter received from Steve Olsen regarding injunction violation.	0.5	0.5
3/1/2021	Draft, circulate and revise email to Steve Olsen regarding outstanding requests in connection with injunction violation.	0.4	0.4
5/28/2021	Review and analyze co-counsel agreement.	0.3	0
6/1/2021	Review and analyze co-counsel agreement; review and revise client engagement letter; circulate both to B. Miller for review.	1.3	0
6/2/2021	Meet with Brad Miller to discuss co-counsel agreement and client engagement letter.	0.2	0
6/3/2021	Revise client engagement letter; draft and send email to co-counsel regarding co-counsel agreement and client engagement letter.	0.4	0
6/9/2021	Revise client engagement letter.	0.1	0
6/9/2021	Participate in meeting with team to discuss motion for attorneys' fees.	0.6	0.6
6/9/2021	Meet with P. Renn to discuss client engagement letter.	0.2	0
6/14/2021	Email communications regarding stipulation to extend deadline for fees motion.	0.3	0.3
6/15/2021	Review and analyze draft stipulation to extend time to file fees motion and proposed order granting the same; email correspondence regarding stipulation; draft notice of change of address.	1.1	1.1
6/17/2021	Email communications regarding stipulation to extend deadline to file fees motion.	0.2	0.2
6/18/2021	Revise and send client engagement letters.	0.6	0
6/21/2021	Draft and send email communications regarding stipulation to extend time for fees motion.	0.2	0.2
6/22/2021	Finalize for filing change of address and stipulation to extend time for filing a fees motion; email and phone communications regarding the same.	1.1	0.5
7/9/2021	Participate in team call regarding fees petition.	0.5	0.5
7/19/2021	Draft and circulate emails regarding recent court orders granting fee petitions.	0.2	0.2
7/23/2021	Review and analyze case law on hourly rates awarded by the District of Idaho on fee petitions.	0.8	0.8
7/26/2021	Review and analyze case law regarding billing rates in Boise for civil rights litigators.	3.2	3.2
7/27/2021	Review and analyze case law regarding Boise billing rates for civil rights litigators; draft declaration regarding the same.	4.8	4.8
7/28/2021	Draft email to Lambda Legal team regarding research on billing rates; draft proposed Boise rates for all attorneys; revise draft declaration regarding legal research on Boise billing rates.	2.3	2.3
8/30/2021	Participate in team meeting regarding anticipated motion for attorneys' fees.	1.1	1.1

8/30/2021	Review and analyze Thomas Lloyd's biography; draft and send email communications to M. Cockerille and T. Lloyd regarding draft declaration.	0.5	0.5
9/1/2021	Review and analyze sample declaration in support of motion for attorneys' fees in anticipation of drafting declaration in support of motion for attorneys' fees.	0.3	0.3
9/1/2021	Draft summary of relevant case law for declaration in support of motion for attorneys' fees.	2.6	2.6
9/2/2021	Meet with Tom Lloyd to discuss Boise rates in advance of drafting declaration in support of motion for fees.	0.5	0.5
9/3/2021	Review and analyze letter from Steve Olsen regarding fees settlement proposal; email communications with team regarding analysis of the same.	0.6	0.6
9/7/2021	Draft qualifications section of Lloyd declaration in support of motion for attorneys' fees; revise summary of case law in Lloyd declaration.	1.8	1.8
9/9/2021	Review attorney biographies and begin drafting biography summaries for Lloyd declaration in support of motion for attorneys' fees.	1.4	1.4
9/15/2021	Continue drafting attorney biographies for Lloyd declaration in support of motion for attorneys' fees; review and revise Lloyd declaration.	2.3	2.3
9/22/2021	Review edits to Lloyd declaration from team members and revise Lloyd declaration; review and assemble all attorney resumes; email communications with T. Lloyd regarding draft declaration.	1.5	1.5
9/23/2021	Review and revise memorandum in support of motion for attorneys fees.	1	0.5
		Total:	103.6
		Total Time Billed Preparing Motion For Fees	24.9
		Total Amount Billed Preparing Motion For Fees	\$6,225.00
	F.V. v. Jeppesen Time Sheet for Attorney Michael Lanosa		
Date	Description	Time Spent	Time Billed
4/22/2020	Prepare for, attend teleconference with I. Belfer, C. Smith re: Idaho birth certificate case.	0.9	0.4
4/29/2020	Legal research re: intermediate scrutiny standard; communicate with K. King re: same.	2	0
5/1/2020	Legal research re: preliminary injunction factors; draft, revise draft outline of preliminary injunction motion; communicate re: same.	10.9	5
5/5/2020	Perform additional legal research to support preliminary injunction motion; memorandum to H. Liu re same.	4	2
5/6/2020	Additional legal research re: irreparable harm.	3.7	3.7
5/7/2020	Revise, communicate re motion for clarification reply brief; perform factual research to support potential PI motion.	7.3	3.5
5/8/2020	Review correspondence from Lambda team; communicate re: strategy re: PI motion; perform further legal research to support merits arguments.	2.5	2.5
5/11/2020	Review correspondence from Lambda re: case strategy; review scientific article re the effect on transgender people of having correct identity documents; review as-filed motion for clarification reply brief; prepare for and attend weekly strategy meeting with Lambda; perform further factual research to support merits arguments.	4.4	2.2
5/12/2020	Perform additional research re: irreparable harm element of preliminary injunction test; draft memorandum re: same.	6.1	3
5/13/2020	Additional legal research re: irreparable harm; communicate re: same.	2	2

6/1/2020	Communicate re: merits outline; analyze, communicate re: Judge Dale's order on plaintiffs motion for clarification in F.V. v. Barron.	2.4	2.4
6/2/2020	Perform legal research to support additional arguments in merits outline regarding opposition to motion to dissolve.	1.8	1.8
6/5/2020	Perform legal research re: HB 509 discrimination issue.	4.6	2
6/6/2020	Research cases involving successful equal protection challenges under the rational basis review standard.	5.8	3
6/20/2020	Review correspondence re: request for status conference.	0.2	0.2
6/30/2020	Review correspondence from P. Renn re: communications with opposing counsel.	0.1	0
7/16/2020	Review, revise draft RFPs.	2.9	2.9
7/20/2020	Prepare for, participate in team meeting to moot oral argument on Plaintiffs' second motion for clarification.	2.1	2.1
7/22/2020	Telephone conference with Mr. Renn, Ms. Smith, and Ms. Cockerille re: hearing on motion for clarification.	0.3	0
7/27/2020	Communicate with team re: email from P. Renn and proposed discovery requests to defendants.	0.2	0.2
7/28/2020	Review Lambda's revision to the draft requests for production; communicate with team regarding same; further revise draft requests for production.	1.1	1.1
7/29/2020	Review the District of Idaho's local rules regarding discovery; draft interrogatories to defendants; communicate with Covington team re: same.	2.7	2
7/31/2020	Confer with P. Renn re: RFPs; communicate with Covington team re: same.	0.4	0.4
8/10/2020	Review draft letter to opposing counsel from P. Renn; review recent media coverage of the court's order granting Plaintiffs' second motion for clarification; revise draft interrogatories and requests for production; communicate with Covington colleagues re: same.	1.6	0
8/11/2020	Review correspondence from opposing counsel; review, communicate re: draft discovery requests; review IDHW's revised sex marker change application packet and compare same to pre-HB 509 version.	1.1	1.1
8/16/2020	Legal research re: post-judgment discovery.	6.9	6.9
8/17/2020	Draft memorandum to team regarding post-judgment discovery research; communicate with P. Renn and K. Ingelhart re: Lambda's revisions to draft RFPs; incorporate revisions into current version of draft RFPs.	0.9	0.9
1/4/2021	Review, analyze memoranda from Lambda team re: potential topics for discovery and other strategies in opposing Defendants' anticipated motion to dissolve.	1.3	1.3
1/6/2021	Communicate re: documents from K. Ingelhart; plan and prepare for the taking of discovery in connection with defendants' anticipated motion.	0.8	0.8
1/8/2021	Prepare for and attend call with K. Ingelhart re: research to support opposition to defendants' anticipated motion; compile list of research topics related to the merits of plaintiffs' claims and tentative assignments for Covington team and circulate same to I. Belfer and C. Smith; begin researching assigned merits topics.	4.4	4.4
		Total:	57.8
	F.V. v. Jeppesen Time Sheet for Attorney Isaac Belfer		
Date	Description	Time Spent	Time Billed
4/22/2020	Participate in call to discuss Idaho matter with Michael Lanosa and Colleen Smith.	0.4	0.4

4/27/2020	Prepare for, participate in call with co-counsel re: litigation tasks.	2.5	1
4/28/2020	Perform legal research re: standing.	2.2	2.2
4/29/2020	Perform legal research re: standing and pleading issues.	1.8	1.8
4/30/2020	Perform legal research re: standing, pleading issues.	4.4	3.4
5/1/2020	Analyze pleading issues in preparation for call.	0.8	0
5/1/2020	Draft memo re: standing/pleading issues.	5.2	4.2
5/1/2020	Perform legal research re: standing, pleading issues.	1.6	1.6
5/2/2020	Revise memo re: standing/pleading issues.	1.7	1.7
5/4/2020	Analyze motion for clarification briefing.	1	1
5/4/2020	Draft research note to co-counsel re: standing and other strategic issues.	1.5	1.5
5/5/2020	Analyze standing issues.	1.7	1.7
5/5/2020	Revise memo re: standing, strategic issues.	1.9	1.9
5/7/2020	Revise reply in support of motion for clarification.	1.2	1.2
5/8/2020	Analyze strategic issues re new complaint.	1.8	0.8
5/15/2020	Participate in moot on motion for clarification	1.4	1.4
6/1/2020	Analyze decision on motion for clarification and emails re: same.	0.6	0.6
6/20/2020	Perform legal research re: ripeness.	4.5	4.5
6/22/2020	Revise motion for clarification.	3	3
7/6/2020	Review motion for clarification briefing.	0.5	0.5
7/6/2020	Discuss motion for clarification, case strategy with litigation team.	0.6	0.6
7/15/2020	Revise RFPs.	1.2	1.2
8/7/2020	Review decision on motion for clarification.	0.4	0.4
8/12/2020	Exchange emails re: state's compliance with injunction.	0.1	0.1
12/14/2020	Discuss response to government's anticipated motion to dissolve injunction.	0.7	0.7
1/8/2021	Participate in call re: potential expert report.	0.7	0.7
1/12/2021	Perform legal research re: potential depositions.	1	1
1/15/2021	Analyze issues re: export report related to opposing motion to dissolve.	1.6	1.6
1/21/2021	Analyze issues re: export report related to opposing motion to dissolve.	1.1	1.1
2/9/2021	Revise letter re: violation of injunction.	0.6	0.6
		Total:	42.4

F.V. v. Jeppesen Time Sheet for Attorney Jamie Farnsworth			
Date	Description	Time Spent	Time Billed
3/19/2020	Research legislative activity regarding HB 509; send emails with Mr. Renn re: same.	2.8	0
3/20/2020	Research legislative activity regarding HB 509; send emails with Mr. Renn re: same.	2.3	0
3/23/2020	Research legislative activity regarding HB 509	2.9	0
3/24/2020	Research legislative activity regarding HB 509; emails with Mr. Renn re: same.	1.9	0
3/26/2021	Research legislative activity regarding HB 509	1.7	0
3/30/2020	Research legislative activity regarding HB 509.	1.7	0
3/30/2020	Telephone conference with litigation team to discuss litigation tasks.	1	0.5
3/31/2020	Research legislative history regarding HB 509, e.g., gather lawmaker statements; email with Ms. Ingelhart and others re: legislative history	0.9	0
4/1/2020	Research legislative history regarding HB509	1.2	0
4/1/2020	Telephone conference with Mr. Renn re: legislative history research	0.3	0.3
4/2/2020	Research legislative history regarding HB 509, including emails with Mr. Renn and others re: same.	1.8	0
4/3/2020	Emails with Mr. Renn and others re: legislative history research, including access to unposted hearing audio or transcripts	1.5	0
4/5/2020	Review audio/video from HB 509 hearings and gather lawmaker statements	3.1	0
4/8/2020	Email with Mr. Renn and Ms. Cockerille re: legislative history research; work on compiling and organizing all HB 509 related documents	0.9	0
4/9/2020	Email litigation team re: access to organized HB 509 related documents.	0.2	0
4/10/2020	Research legislative history regarding HB 509; emails with Mr. Renn, Ms. Ingelhart, and others re: same.	0.5	0
4/10/2020	Call with litigation team to discuss litigation tasks.	1.1	0.5
4/13/2020	Research legislative history regarding HB 509, including emails with Mr. Renn and others re: same; research formal public records requests	5.2	5.2
4/14/2020	Cite-check, review, and proofread Motion for Clarification; review lawmaker statements re HB 509	4.9	4.9
4/15/2020	Finish cite-checking Motion for Clarification and proofread same	3.8	3.8
4/24/2020	Compile relevant FV documents to share, and email co-counsel; Email with Mr. Renn re: same and public records requests	1	0
4/27/2020	Send emails with Mr. Renn re: lawmaker statements; Work on public records request	1.5	1.5
4/27/2020	Call with litigation team to discuss litigation tasks.	1	0.5
4/30/2020	Contact Legislative Services Office about public records request; send email and draft of public records request to litigation team; Emails with Mr. Renn re: same.	2.4	2.4
5/7/2020	Work on Reply to Motion for Clarification, including cite-check; Send emails with Mr. Renn re: same	3.7	3.7
5/11/2020	Emails with Mr. Renn re: public records request	0.2	0.2

5/11/2020	Call with litigation team to discuss litigation tasks.	1.1	0.5
5/12/2020	Finalize drafts of public records requests; Emails with Mr. Renn and Ms. Huppert re: same.	3.1	3.1
5/18/2020	Call with litigation team to discuss litigation tasks.	1	0.5
5/20/2020	Email with team re public records requests	0.1	0.1
5/26/2020	Call with litigation team to discuss litigation tasks.	1	0
6/8/2020	Call with litigation team to discuss litigation tasks.	0.6	0
6/15/2020	Call with litigation team to discuss litigation tasks	0.4	0
6/19/2020	Email with Ms. Huppert re: Idaho legislative history; Email with Mr. Renn re: Motion re: Status Conference	0.5	0
6/22/2020	Email with Ms. Huppert re: receipt of large files from Idaho re: public records; Work on cite-checking Motion for Clarification	4.1	4.1
6/22/2020	Call with litigation team to discuss litigation tasks.	0.4	0
6/29/2020	Call with litigation team to discuss litigation tasks.	0.6	0
7/6/2020	Call with litigation team to discuss litigation tasks.	0.6	0
7/6/2020	Work on cite checking reply with Ms. Huppert; analyze changes to new application packet on Idaho website	3.2	3.2
7/7/2020	Finish reviewing and proofing reply; Email with Ms. Huppert re: same	2.1	2.1
7/22/2020	Listen and take notes at hearing; meet with litigation team to discuss; clean up notes and circulate to team.	2	0
8/10/2020	Call with litigation team to discuss litigation tasks.	0.9	0
8/11/2020	Compare new Idaho application packet with previous and circulate redline to litigation team	0.8	0.8
9/17/2021	Cite check and proofread Wysong declaration	1.7	0.9
9/23/2021	Review and proofread Renn declaration	1.2	0.6
9/24/2021	Cite check fees motion	2.6	2.6
9/27/2021	Cite check fees motion	3.4	3.4
		Total:	45.4
		Total Time Billed Preparing Motion For Fees	7.5
		Total Amount Billed Preparing Motion For Fees	\$1,312.50

EXHIBIT B-2***F.V. vs. Jeppesen, et al., Case No. 1:17-cv-000170-CWD*****Summary of Plaintiffs' counsels' hours and rates for Plaintiffs' fee petition (requested fees-on-fees)**

Attorney		Hours	Rate - 2021	Total Fee
Peter Renn		77	\$675	\$51,975.00
Nora Huppert	(thru 8/31/21)	26.8	\$350	\$9,380.00
	(after 9/1/21)	42.4	\$270	\$11,448.00
Kara Ingelhart		14.9	\$330	\$4,917.00
Monica Cockerville		3.8	\$410	\$1,558.00
Colleen Smith		24.9	\$250	\$6,225.00
Jamie Farnsworth, Paralegal		7.5	\$175	\$1,312.50
Total:		197.3		\$86,815.50

¹ Messrs. Lanosa and Belfer did not bill time on Plaintiffs' fee petition.

EXHIBIT C***F.V. vs. Jeppesen, et al., Case No. 1:17-cv-000170-CWD*****Summary of Plaintiffs' counsels' ADJUSTED hours and rates for Plaintiffs' fee petition (fees-on-fees)**

Attorney	Hours	Rate – 2021 Boise	Total Fee
Peter Renn	17.9 ¹	\$370	\$6,615.60
Nora Huppert	16	\$220	\$3,528.80
Kara Ingelhart	3.4	\$280	\$963.20
Monica Cockerville	0.9	\$410	\$360.80
Jamie Farnsworth, Paralegal	1.8	\$175	\$308.00
Total:	40²		\$11,776.40

¹The number of hours allocated for the attorneys and paralegal is determined by adding the total amount of time spent by these individuals on the attorney fee petition and then dividing each individual's time spent by the total to determine a percentage for each individual. That percentage is then applied to the 40 hours defendants contend should be paid for plaintiffs' preparation of the attorney fee petition. By way of example, Mr. Renn spent 77 hours of the total 172.4 hours these plaintiffs' counsel spent preparing the fee petition. The 77 hours Mr. Renn spent in this regard is 44.7% of the total 172.4 hours. If the total reasonable hours spent is 40 hours, 44.7% of 40 hours is 17.9 hours. Thus, Mr. Renn's adjusted hours, as indicated in the table above, is 17.9 hours.

² Defendants have argued that the legal services of Covington lawyer, Colleen Smith, and the other two Covington lawyers, Messrs. Lanosa and Belfer, were unnecessary and redundant in the post-judgment proceedings. Therefore, in Defendants' calculation of what constitutes a reasonable fees-on-fees award for Plaintiffs, Ms. Smith's time spent on the fee petition has been removed.

EXHIBIT D***F.V. vs. Jeppesen, et al., Case No. 1:17-cv-000170-CWD*****Summary of Plaintiffs' counsels' ADJUSTED hours and rates for all post-judgment work**

Attorney		Requested Hours	Adjusted Hours	Adjusted Rate	Adjusted Fees
Peter Renn	2020 ¹	312	166.9	\$360	\$60,084.00 ²
	2021 ³	84.6	25.5	\$370	\$9,435.00
Nora Huppert	2020	197	163.1	\$210	\$34,251.00
	2021	80.8	27.6	\$220	\$6,072.00
Kara Ingelhart	2020	94.5	87.6	\$270	\$23,652.00
	2021	15.1	3.6	\$280	\$1,008.00
Monica Cockerville	2020	24.9	17.4	\$410	\$7,134.00
	2021	4.8	1.9	\$410	\$779.00
Jamie Farnsworth, Paralegal	2020	37.9	25.5	\$175	\$4,462.50
	2021	7.5	1.8	\$175	\$315.00
Total		859.1	520.9		\$147,192.502

¹ An attorney's adjusted 2020 hours reflect the attorney's individual time spent on all post-judgment work in 2020, less the time this attorney spent on Plaintiffs' first motion to clarify, which was filed in 2020. For the time each attorney spent on Plaintiffs' first motion to clarify, see Ex. A-2 to Olsen Dec.

² To calculate the adjusted fees, an attorney's adjusted hours are multiplied by the attorney's adjusted rate (*i.e.*, the corresponding Boise rates set forth in Plaintiffs' Lloyd Declaration).

³ An attorney's adjusted 2021 hours reflect the attorney's individual time spent on all post-judgment work in 2021, but also reflects an adjustment to the time this attorney spent on Plaintiffs' fee petition, which was filed in 2021. To illustrate, with respect to attorney Peter Renn, he logged 84.6 hours as his total 2021 hours. Of those 84.6 hours in 2021, he logged 77 hours for preparing Plaintiffs' fee petition alone. See Ex. B-2 to Olsen Dec. Because the amount of hours Mr. Renn spent on the fee petition is excessive, his hours working on the fee petition should be reduced to 17.9 hours, for the reasons noted in Defendants' opposition brief. To arrive at Mr. Renn's adjusted 2021 hours, Defendants used the following calculation: $84.6 - 77 = 7.6 + 17.9 = 25.5$. Thus, Mr. Renn's adjusted 2021 hours is 25.5.